



**South Dublin** 2022-2028  
**County Development Plan**

**SOUTH DUBLIN COUNTY COUNCIL DRAFT  
DEVELOPMENT PLAN 2022-2028**

**CHIEF EXECUTIVE'S REPORT ON DRAFT PLAN PUBLIC  
CONSULTATION**

**7<sup>th</sup> December 2021  
Land Use Planning and Transportation Department  
South Dublin County Council**

This Chief Executive's report is provided to the Members in response to the submissions and consultations received during the Draft Plan consultation of the South Dublin County Development Plan 2022-2028 as required under section 11(4)(a) of the Planning and Development Act 2000 (as amended).



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Daniel McLoughlin  
Chief Executive South Dublin County Council

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## GLOSSARY OF TERMS:

<b>AA:</b>	Appropriate Assessment
<b>ABT:</b>	Account Based Ticketing
<b>ABTA:</b>	Area Based Transport Assessment
<b>ACA:</b>	Architectural Conservation Area
<b>AFA:</b>	Area for Further Assessment (Flooding)
<b>AHB:</b>	Approved Housing Body
<b>BCMS:</b>	Building Control Management System
<b>BER:</b>	Building Energy Rating
<b>BEV:</b>	Battery Electric Vehicle
<b>BHDG:</b>	Building Height and Density Guide (for South Dublin County)
<b>BID:</b>	Business Improvement District
<b>BREEAM:</b>	Building Research Establishment Environmental Assessment Methodology
<b>BRT:</b>	Bus Rapid Transit
<b>CARO:</b>	Climate Action Regional Office
<b>CCAP:</b>	Climate Change Action Plan
<b>CCT:</b>	Correlated Colour Temperature
<b>CDP:</b>	County Development Plan
<b>CEUD:</b>	Centre for Excellence in Universal Design
<b>CFRAM:</b>	Catchment Flood Risk Assessment and Management
<b>CMP:</b>	Construction Management Plan
<b>CNG:</b>	Compressed Natural Gas
<b>CoCo:</b>	County Council
<b>CNG:</b>	Compressed Natural Gas
<b>C0:</b>	Carbon Dioxide
<b>CPO:</b>	Compulsory Purchase Order
<b>CSO:</b>	Central Statistics Office
<b>DAA:</b>	Dublin Airport Authority
<b>DAP:</b>	Drainage Area Plan
<b>DART:</b>	Dublin Area Rapid Transit
<b>DoEHLG:</b>	Department of the Environment, Heritage and Local Government
<b>DoECLG:</b>	Department of Environment, Community and Local Government
<b>DoCHG:</b>	Department of Culture, Heritage and the Gaeltacht
<b>DC:</b>	District Centre
<b>DCC:</b>	Dublin City Council
<b>DCS:</b>	Development Contribution Scheme
<b>DCU:</b>	Dublin City University
<b>DES:</b>	Department of Education and Skills
<b>DH:</b>	District Heating
<b>DHPLG:</b>	Department of Housing, Planning and Local Government
<b>DLR:</b>	Dun Laoghaire Rathdown County Council
<b>DMA:</b>	Dublin Metropolitan Area
<b>DMASP:</b>	Dublin Metropolitan Area Strategic Plan
<b>DMP:</b>	Dublin Mountain Partnership
<b>DMURS:</b>	Design Manual for Urban Roads and Streets
<b>DTTaS:</b>	Department of Transport, Tourism and Sport
<b>DZ:</b>	De-Carbonising Zone
<b>ECCE:</b>	Early Childhood Care & Education
<b>ECFRAM:</b>	Eastern Catchment Flood Risk Assessment and Management Plan
<b>EcIA:</b>	Ecological Impact Assessment
<b>EASA:</b>	European Aviation Safety Agency
<b>EIA:</b>	Environmental Impact Assessment
<b>EIAR:</b>	Environmental Impact Assessment Report
<b>EMRA:</b>	Eastern and Midlands Regional Assembly



<b>EMRSES:</b>	Eastern and Midlands Regional Spatial & Economic Strategy
<b>EPA:</b>	Environmental Protection Agency
<b>ESB:</b>	Electricity Supply Board
<b>ESPON:</b>	European Spatial Planning Observation Network
<b>ESRI:</b>	Economic and Social Research Institute
<b>EU:</b>	European Union
<b>EV:</b>	Electric Vehicle
<b>FCC:</b>	Fingal County Council
<b>FRMP:</b>	Floodrisk Management Plan
<b>GAA:</b>	Gaelic Athletic Association
<b>GDA:</b>	Greater Dublin Area
<b>GDSS:</b>	Groundwater Decision Support System
<b>GHG:</b>	Greenhouse Gas
<b>GI:</b>	Green Infrastructure
<b>GNI:</b>	Gas Networks Ireland
<b>GP:</b>	General Practitioner
<b>GSI:</b>	Geological Survey Ireland
<b>GW:</b>	Gigawatt
<b>HEFS:</b>	High End Future Scenario
<b>HGV:</b>	Heavy Goods Vehicle
<b>HIF:</b>	Healthy Ireland Framework
<b>HNDA:</b>	Housing Need and Demand Assessment
<b>HSE:</b>	Health Service Executive
<b>IAA:</b>	Irish Aviation Authority
<b>ICAO:</b>	International Civil Aviation Organisation
<b>ICT:</b>	Information and Communications Technology
<b>IDA:</b>	Industrial Development Authority
<b>IW:</b>	Irish Water
<b>IWEA:</b>	Irish Wind Energy Association
<b>IWCIP:</b>	Irish Water Capital Investment Plan
<b>HSE:</b>	Health Service Executive
<b>LAP:</b>	Local Area Plan
<b>LCA:</b>	Landscape Character Assessment
<b>LDA:</b>	Land Development Agency
<b>LED:</b>	Light-Emitting Diode
<b>LEED:</b>	Leadership in Energy Efficiency and Design
<b>LCDC:</b>	Local Community Development Committees
<b>LECP:</b>	Local Economic and Community Plan
<b>LEO:</b>	Local Enterprise Office
<b>LGMA:</b>	Local Government Management Agency
<b>LIHAF:</b>	Local Infrastructure Housing Activation Fund
<b>MoU:</b>	Memorandum of Understanding
<b>MASP:</b>	Metropolitan Area Strategic Plan
<b>MTC:</b>	Major Town Centre
<b>MUD:</b>	Multi-Unit Developments
<b>NA:</b>	Neighbourhood Area
<b>NC:</b>	Neighbourhood Centre
<b>NDP:</b>	National Development Plan
<b>NPF:</b>	National Planning Framework
<b>NPO:</b>	National Policy Objective
<b>NHA:</b>	Natural Heritage Area
<b>NPWS:</b>	National Parks and Wildlife Services
<b>NPAP:</b>	National Physical Activity Plan
<b>NSOs:</b>	National Strategic Objectives
<b>NTA:</b>	National Transport Authority
<b>nZEB:</b>	Near Zero Carbon Building
<b>OMC:</b>	Operating Management Company
<b>OPR:</b>	Office of the Planning Regulator
<b>OPW:</b>	Office of Public Works
<b>OSI:</b>	Ordnance Survey Ireland

<b>PFRA:</b>	Preliminary Flood Risk Assessment
<b>PCC:</b>	Primary Care Centre
<b>EV:</b>	Electric Vehicle
<b>PHEV:</b>	Plug in Hybrid Electric Vehicle
<b>PPN:</b>	Public Participation Network
<b>PV:</b>	Photovoltaics
<b>QBC:</b>	Quality Bus Corridor
<b>QGasSP:</b>	Quantitative Greenhouse Gas Impact Assessment Method for Spatial Planning Policy
<b>RBMP:</b>	River Basin Management Plan
<b>RESS:</b>	Renewable Electricity Support Scheme
<b>RSES:</b>	Regional Spatial & Economic Strategy
<b>RPOs:</b>	Regional Planning Objectives
<b>RTB:</b>	Residential Tenancies Board
<b>SAC:</b>	Special Area of Conservation
<b>SAAO:</b>	Special Area Amenity Order
<b>SIA:</b>	Social/Community Infrastructural Audit
<b>SD:</b>	South Dublin
<b>SDCC:</b>	South Dublin County Council
<b>SDCYPSC:</b>	South Dublin Children Young People Services Committee
<b>SDGs:</b>	Sustainable Development Goals
<b>SDZ:</b>	Strategic Development Zone
<b>SFRA:</b>	Strategic Floodrisk Assessment
<b>SEA:</b>	Strategic Environmental Assessment
<b>SEAI:</b>	Sustainable Energy Authority of Ireland
<b>LARES:</b>	Local Authority Renewable Energy Strategies
<b>SHD:</b>	Strategic Housing Development
<b>SLO:</b>	Strategic Local Objective
<b>SPPRs:</b>	Specific Planning Policy Requirements
<b>STEM:</b>	Science, Technology, Engineering and Mathematics
<b>SUDS:</b>	Sustainable Drainage Systems
<b>The Act:</b>	The Planning and Development Act, 2000 as amended
<b>TII:</b>	Transport Infrastructure Ireland
<b>TUD:</b>	Technological University Dublin
<b>UCD:</b>	University College Dublin
<b>UD:</b>	Universal Design
<b>UN:</b>	United Nations
<b>USSPV:</b>	Utility Scale Solar Photovoltaic
<b>URDF:</b>	Urban Regeneration Development Fund
<b>WFD:</b>	Water framework Directive
<b>WSSP:</b>	Water Services Strategic Plan

## 1.0 Part 1 Introduction

Pursuant to Section 12 of the Planning and Development Act 2000 (as amended), notice of the preparation of the South Dublin County Council Draft Development Plan 2022-2028 was given on Wednesday 7<sup>th</sup> July 2021. Submissions or observations with regard to the Draft Plan and Environmental Reports (Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment) were invited for a period of just over 10 weeks from Wednesday 7<sup>th</sup> July 2021 up to 15<sup>th</sup> September 2021 inclusive, in writing or online on the Council's submission portal. The notices included details of the display of the Draft Plan together with the dates and times of public information sessions and the availability of Council staff for further consultation. In accordance with the requirements of Section 12(4)(b) of the Planning and Development Act 2000 (as amended), this Chief Executive's Report summarises and details the outcome of the public consultation programme on the Draft County Development Plan and provides recommendations as follows:

- Lists the persons or bodies who made submissions or observations on the Draft Plan;
- Summarises the issues raised under the submissions or observations received during the consultation period from all persons and bodies. This includes the issues raised and recommendations made by the Office of the Planning Regulator, the National Transport Authority and the Eastern and Midland Regional Assembly;
- Gives the response of the Chief Executive to the issues raised and recommendations made, taking account of:
  - ☒ any directions of the members of the authority regarding the preparation of the Draft Development Plan,
  - ☒ the proper planning and sustainable development of the area,
  - ☒ the statutory obligations of the local authority and any relevant policies or objectives of the Government or of any Minister of the Government,
  - ☒ and any observations made by the Minister for Arts, Heritage, Gaeltacht and the Islands relating to any addition to or deletion from the Record of Protected Structures.

This Chief Executive's Report on the Draft Plan consultation is hereby submitted to the members of the Planning Authority for their consideration. The elected members have up to 12 weeks to consider this Chief Executive's Report (plus 9 extra days to account for the Christmas period). Members will be briefed on the 9<sup>th</sup> December to provide an overview of the CE Report and in January 2022. Special Meetings of South Dublin County Council will take place in February/March 2022 to decide whether to adopt or amend the Draft Plan.

### 1.0.1 Strategic Environmental Assessment (SEA)

A Draft Environmental Report accompanies the Draft County Development Plan 2022-2028. The Draft Environmental Report contains a detailed analysis of the Draft County Development Plan 2022-2028 and how the implementation of the Plan would impact on its receiving environment. The Chief Executive's recommendations as set out in this report (including recommendations on the Environmental Authorities submissions detailed in Appendix A) have been assessed to determine whether they would have any significant impact on the environment. Taking into account the mitigation measures which have already been integrated into the Draft Plan, it was considered that the amendments proposed on foot of recommendations in this Chief Executive's Report would not have any significant adverse effect on the environment. Any proposed material amendments will subsequently also be screened for the need to undertake SEA. The findings of this screening exercise together with, if required, a full SEA will accompany any proposed material amendments that go on public display following consideration of the Draft Plan and this Chief Executive's Report.

## **1.0.2 Appropriate Assessment (AA)**

In accordance with requirements under EU Habitats Directive (92/43/EEC) and Section 177 of the Planning and Development Act 2000(as amended), amendments proposed on foot of this Chief Executive's Report have been screened to assess whether they would have a significant effect on one or more Natura 2000 sites. It was considered that the amendments proposed on foot of the recommendations, alone and in combination with other plans and projects including the Draft Plan, would not have any significant effect on any Natura 2000 sites.

## 1.1 Overview of Consultation

Having undertaken Pre-Draft Public Consultation between July and September 2020, consultation on the South Dublin County Council Draft Development Plan 2022-2028 marked Stage 2 in the review of the County Development Plan. The key actions in the review process including those undertaken under Stages 1 and 2 (shown in faded grey text) are summarised in Figure 1 below.

<b>STAGE 1: PRE-DRAFT (Complete)</b>
NOTICE OF REVIEW STAKEHOLDER & PUBLIC CONSULTATION CHIEF EXECUTIVE'S REPORT ON CONSULTATION SUBMITTED TO MEMBERS
MEMBERS CONSIDER REPORT & GIVE DIRECTIONS REGARDING PREPARATION OF THE DRAFT PLAN
CHIEF EXECUTIVE PREPARES DRAFT PLAN AND SUBMITS TO MEMBERS FOR CONSIDERATION
MEMBERS CONSIDER DRAFT PLAN AND CAN ACCEPT OR AMEND STAGE 2: DRAFT (Current Stage)
<b>STAGE 2: DRAFT (Current Stage)</b>
NOTICE OF DRAFT PLAN CONSULTATION ON DRAFT PLAN CHIEF EXECUTIVE'S REPORT ON SUBMISSIONS/OBSERVATIONS SUBMITTED TO MEMBERS
MEMBERS CONSIDER REPORT & DRAFT PLAN AND CAN AMEND – <b>WE ARE HERE</b>
<b>STAGE 3: MATERIAL ALTERATIONS (Next Stage, if changes are material)</b>
NOTICE OF PROPOSED MATERIAL ALTERATIONS CONSULTATION ON PROPOSED MATERIAL AMENDMENTS CHIEF EXECUTIVE'S REPORT ON SUBMISSIONS/OBSERVATIONS SUBMITTED TO MEMBERS
MEMBERS CONSIDER REPORT & PROPOSED AMENDMENTS AND CAN ACCEPT OR MODIFY
<b>PLAN ADOPTED</b>

Fig. 1 – Summary of Review Process

### 1.1.1 Consultation on Draft Development Plan

The South Dublin County Draft Development Plan 2022-2028 and the public consultation programme were officially launched on Wednesday 7th July 2021. Consultation on the South Dublin County Council Draft Development Plan 2022-2028 was undertaken for a period of just over 10 weeks from 7th July 2021 to 15th September 2021 inclusive. The public consultation followed a well-planned and laid out strategy resulting in 302 submissions.

#### Printed Media

The printed media was used to great advantage in disseminating information on the public consultation. Advertisements were placed in both the local and national press. The Echo Newspaper ran eight weekly articles covering each of the Chapters contained within the Draft Plan.

#### Social Media

A social media campaign on the South Dublin County Council Draft Development Plan 2022-2028 and public consultation programme was undertaken from Wednesday 7th July 2021 on Twitter, Facebook and Instagram and continued weekly over the entire 10-week public consultation period.

#### Bus Stop Shelter Advertisements

The South Dublin County Draft Development Plan 2022-2028 and the public consultation programme were advertised at Dublin Bus Stops across the County during August 2021.

## **Public Displays**

Public displays were placed at County Hall Tallaght, Civic Offices Clondalkin and at all County libraries for the duration of the public consultation programme. Displays included the Draft Development Plan Written Statement, Maps, Environmental Reports and all other accompanying documents including leaflets on how to make a submission.

## **Open Sessions**

Open sessions with planners were organised on each Tuesday afternoon during the consultation period and held at County Hall, Tallaght. These were organised by appointment only and were generally well attended.

## **Briefing Sessions**

In addition to the public consultation, briefing sessions were provided to the Members and to the Land Use, Transportation and Planning SPC on the draft stage of the Plan.

## 1.2 Consultation Outcome

A total of 302 submissions and observations were received during the prescribed public consultation period.

A list of all the persons/bodies that made submissions or observations on the Draft Plan during the prescribed consultation period is provided in Table 1 below together with individual reference numbers that can be clicked as a link to scanned or uploaded copies of each submission.

Full summaries of the issues raised in the submissions are provided in Parts 2 and 3 of this report.

A total of 820 broad issue areas were identified from the submissions and observations received during the prescribed public consultation period. Full summaries of all of the issues raised in the submissions and observations are set out in Part 3 below together with the responses and recommendations of the Chief Executive. The submissions from the Office of the Planning Regulator, the Eastern and Midland Regional Assembly and National Transport Authority are also summarised independently in Part 2 to this report.

Issues have therefore been summarised under the relevant chapter, subsection or document heading in Part 3 of this report. Table 1 below sets out the number and percentage of broad issues that were raised according to the relevant chapter heading or document.

**Table 1 – Submission Issue Breakdown**

<b>Total Number of Issues identified:</b>	<b>820</b>	
Office of the Planning Regulator	26	3.17
Eastern and Midland Regional Assembly (EMRA)	8	0.98
National Transport Authority (NTA)	13	1.59
Chapter 1 Introduction, Strategic Vision and Climate Action	9	1.1
Chapter 2: Core Strategy and Settlement Strategy	107	13.05
Chapter 3: Natural Heritage, Cultural and Built Heritage	119	14.51
Chapter 4: Green Infrastructure	44	5.37
Chapter 5: Quality Design and Healthy Placemaking	64	7.8
Chapter 6: Housing	48	5.85
Chapter 7: Sustainable Movement	154	18.78
Chapter 8: Community Infrastructure and Open Space	72	8.78
Chapter 9: Economic Development and Employment	67	8.17
Chapter 10: Energy	16	1.95
Chapter 11: Infrastructure and Environmental Services	26	3.17
Chapter 12: Our Neighbourhoods*	5	0.61
Chapter 13: Implementation and Monitoring	25	3.05
14. Appendices*	4	0.49
15. Environmental Reports	11	1.34
16. Miscellaneous*	2	0.24
<b>Total:</b>	<b>820</b>	

The majority of the 820 broad issues that were identified from the submissions related directly to a chapter and subsection of the Draft Development Plan Written Statement or to the documents and maps that accompany the Written Statement including Environmental Reports, the Development Plan Maps and the zoning objectives of sites.

In terms of issues that were relevant to the Draft County Development Plan Review, issues relating to Chapter 7 Sustainable Movement were raised most frequently (19%), followed by Chapter 3 Natural Heritage, Cultural and Built Heritage (c.15%) and Chapter 2 Core Strategy and Settlement Strategy (13%), the latter of which includes land use zoning proposals.

## **1.3 Next Steps**

### **1.3.1 January Briefings**

The Elected Members have up to 12 weeks (plus 9 extra days to account for the Christmas period) to consider this Chief Executive's Report and the South Dublin County Council Draft Development Plan 2022 – 2028.

A first briefing will be held on Thursday 9<sup>th</sup> December to go through the structure of the CE Report, the next steps and the key issues arising. Further to that more detailed briefings will be held in January with the Elected Members before the submission of motions for the meetings to be held in later February and early March 2022.

### **1.3.2 Consideration of Chief Executive's Report & Draft Plan**

Special Meetings of South Dublin County Council will take place in February/March 2022. The date will be scheduled in consultation with elected members with the last meeting to be held on 9<sup>th</sup> March to meet statutory deadlines.

Pursuant to Section 12(11) of the Planning and Development Act 2000 (as amended), in making the Development Plan, South Dublin County Council is restricted to considering the proper planning and sustainable development of the area to which the development plan relates, the statutory obligations of the local authority and any relevant policies or objectives of the Government or any Minister of the Government.

Pursuant to Section 12(4) of the Planning and Development Act 2000 (as amended) where, following the consideration of the Draft Development Plan and this Chief Executive's Report, the members may, by resolution, accept or amend the draft plan and make the development plan accordingly at the Special Meetings. At this stage, the Development Plan will take effect 6 weeks from the day that it is made unless amendments that are considered to be material are made (see below).

### **1.3.3 Proposed Amendments – Stage 3**

In the case where a proposed amendment or amendments would, if made, be a material alteration of the Draft Plan, it is a requirement under Section 12(7) of the Planning and Development Act 2000 (as amended) for the planning authority to publish notice of the proposed amendment(s) within 3 weeks after the passing of the resolution and to make the amendment(s) available for inspection and submission/observation for a period of not less than 4 weeks. A further Chief Executive's Report on the outcome of the consultation period must be prepared within 8 weeks of the published notice of the proposed amendment(s).

It is then a requirement for the members of the authority, by resolution, to make the County Development Plan with or without the proposed amendment/s not later than 6 weeks after the submission of a Chief Executive's Report on the Material Alterations. Once the Development Plan is made, it comes into effect 6 weeks later.

In the case where it is determined that a strategic environmental assessment and/or an appropriate assessment is or are required to be carried out in respect of one or more proposed material alteration(s), it is a requirement (within 2 weeks of the determination) for the Chief Executive to specify the period required for assessment following the passing of the resolution. In such instance it is a requirement of the planning authority to publish notice of the proposed material alteration and the determination to carry out the assessment or assessment(s).



## 1.4 List of Persons/Bodies that Made Submissions

Table 2 provides a list of persons/bodies that made submissions to the Draft Plan.

**Table 2: List of Persons/Bodies that Made Submissions**

Submission	Author	Type
<a href="#">SD-C195-1</a>	Alison Sheppard	Individual
<a href="#">SD-C195-2</a>	Colm Garvey	Individual
<a href="#">SD-C195-3</a>	Elizabeth Davidson	Individual
<a href="#">SD-C195-4</a>	Rhenda Sheedy	Individual
<a href="#">SD-C195-5</a>	Department of Defence	Organisation
<a href="#">SD-C195-6</a>	Nichola Priestley	Individual
<a href="#">SD-C195-7</a>	Sinead O'Driscoll	Individual
<a href="#">SD-C195-8</a>	Lisa A Lowry	Individual
<a href="#">SD-C195-9</a>	Tracy Walsh	Individual
<a href="#">SD-C195-10</a>	Social Enterprise Republic of Ireland	Organisation
<a href="#">SD-C195-11</a>	Proinsias Mac Fhlannchadha	Individual
<a href="#">SD-C195-12</a>	NIALL BYRNE	Individual
<a href="#">SD-C195-13</a>	Environmental Protection Agency (EPA)	Organisation
<a href="#">SD-C195-14</a>	Department of Transport	Organisation
<a href="#">SD-C195-15</a>	WORK Residents Association	Organisation
<a href="#">SD-C195-16</a>	Enda Ward	Individual
<a href="#">SD-C195-17</a>	Donal Pat Cleary	Individual
<a href="#">SD-C195-18</a>	Ross Killen	Individual
<a href="#">SD-C195-19</a>	Knocklyon Network	Organisation
<a href="#">SD-C195-20</a>	Catherine Murphy	Individual
<a href="#">SD-C195-21</a>	Barry Kelly	Individual
<a href="#">SD-C195-22</a>	St Philomena's Parish, Palmerstown	Organisation
<a href="#">SD-C195-23</a>	Gary Tyrrell	Individual
<a href="#">SD-C195-24</a>	Liam Doran	Individual
<a href="#">SD-C195-25</a>	Sarah Holland	Individual
<a href="#">SD-C195-26</a>	Louise Stynes O Connor	Individual
<a href="#">SD-C195-27</a>	Partas	Organisation
<a href="#">SD-C195-28</a>	Partas	Organisation
<a href="#">SD-C195-29</a>	St Philomena's Parish, Palmerstown	Organisation
<a href="#">SD-C195-30</a>	Laura O'Reilly	Individual
<a href="#">SD-C195-31</a>	William Lavelle	Individual
<a href="#">SD-C195-32</a>	Department of Defence	Organisation
<a href="#">SD-C195-33</a>	Office of Public Works	Organisation
<a href="#">SD-C195-34</a>	Lisa Maher	Individual
<a href="#">SD-C195-35</a>	Department of Communications, Climate Action and Environment	Organisation
<a href="#">SD-C195-36</a>	Niall Mahon	Individual
<a href="#">SD-C195-37</a>	Michael Corrigan	Individual
<a href="#">SD-C195-38</a>	Thomas Leigh	Individual
<a href="#">SD-C195-39</a>	Fionán Ó Cuireáin	Individual
<a href="#">SD-C195-40</a>	Colin Morrison	Individual
<a href="#">SD-C195-41</a>	Dara Larkin	Individual

<a href="#">SD-C195-42</a>	James Lawless	Individual
<a href="#">SD-C195-43</a>	Elizabeth Davidson	Individual
<a href="#">SD-C195-44</a>	Roadstone Ltd.	Organisation
<a href="#">SD-C195-45</a>	EMRA	Organisation
<a href="#">SD-C195-46</a>	Edel Sherlock	Individual
<a href="#">SD-C195-47</a>	Douglas Hyde	Individual
<a href="#">SD-C195-48</a>	Finlay Colley	Individual
<a href="#">SD-C195-49</a>	Kieran Mahon	Staff member
<a href="#">SD-C195-50</a>	Kieran Mahon	Staff member
<a href="#">SD-C195-51</a>	Finnstown Fairways Residents Association	Organisation
<a href="#">SD-C195-52</a>	Edward Fox	Individual
<a href="#">SD-C195-53</a>	Hellfire Massy Residents Association	Organisation
<a href="#">SD-C195-54</a>	Transport Infrastructure Ireland	Organisation
<a href="#">SD-C195-55</a>	St. Patrick's Mental Health Services	Organisation
<a href="#">SD-C195-56</a>	Rohan Holdings Ltd.	Organisation
<a href="#">SD-C195-57</a>	David Build More Housing	Individual
<a href="#">SD-C195-58</a>	Declan Brassil & Co. Ltd.	Organisation
<a href="#">SD-C195-59</a>	Litter Mugs	Organisation
<a href="#">SD-C195-60</a>	Quanta Capital	Organisation
<a href="#">SD-C195-61</a>	Fonthill Residents Association	Organisation
<a href="#">SD-C195-62</a>	Michael Bennett	Individual
<a href="#">SD-C195-63</a>	Kildare County Council	Organisation
<a href="#">SD-C195-64</a>	Saggart Village Residents' Association	Organisation
<a href="#">SD-C195-65</a>	Daragh Cagney	Individual
<a href="#">SD-C195-66</a>	linda Quinn	Individual
<a href="#">SD-C195-67</a>	Hermitage Park	Organisation
<a href="#">SD-C195-68</a>	Peter Meighan	Individual
<a href="#">SD-C195-69</a>	Siobhan Nolan	Individual
<a href="#">SD-C195-70</a>	Sean Ward	Individual
<a href="#">SD-C195-71</a>	Kamila KOZLOWSKA	Individual
<a href="#">SD-C195-72</a>	Gordon Place	Individual
<a href="#">SD-C195-73</a>	Prismline Ltd	Organisation
<a href="#">SD-C195-74</a>	BMA Planning	Organisation
<a href="#">SD-C195-75</a>	Declan Brassil	Individual
<a href="#">SD-C195-76</a>	Donal & Miriam Griffin	Individual
<a href="#">SD-C195-77</a>	NIALL BYRNE	Individual
<a href="#">SD-C195-78</a>	Recorder Residents Associarion	Organisation
<a href="#">SD-C195-79</a>	Moffash Ltd	Organisation
<a href="#">SD-C195-80</a>	Moffash Ltd	Organisation
<a href="#">SD-C195-81</a>	Peter Anderson	Individual
<a href="#">SD-C195-82</a>	Metro South West Group	Organisation
<a href="#">SD-C195-83</a>	Reid Associates	Organisation
<a href="#">SD-C195-84</a>	Edmondstown Golf Club	Organisation
<a href="#">SD-C195-85</a>	Joe Magee	Individual
<a href="#">SD-C195-86</a>	Alanna Homes Limited	Organisation
<a href="#">SD-C195-87</a>	Gareth Stanley	Individual

<a href="#">SD-C195-88</a>	Emma Louise Doyle	Individual
<a href="#">SD-C195-89</a>	Stephen Heaney	Individual
<a href="#">SD-C195-90</a>	Temple Manor Wilkins Residents Association	Organisation
<a href="#">SD-C195-91</a>	Tallaght RFC	Organisation
<a href="#">SD-C195-92</a>	Lidl Ireland GmbH	Organisation
<a href="#">SD-C195-93</a>	Swim Ireland	Organisation
<a href="#">SD-C195-94</a>	Georgina McDermott	Individual
<a href="#">SD-C195-95</a>	BMA Planning	Organisation
<a href="#">SD-C195-96</a>	Frances Mallon	Individual
<a href="#">SD-C195-97</a>	Mountpark	Organisation
<a href="#">SD-C195-98</a>	James Anderson	Individual
<a href="#">SD-C195-99</a>	Irish Water	Organisation
<a href="#">SD-C195-100</a>	Niamh Geoghegan	Individual
<a href="#">SD-C195-101</a>	Vincent Tsoi	Individual
<a href="#">SD-C195-102</a>	Orla Daly	Individual
<a href="#">SD-C195-103</a>	Daniel Rattigan	Individual
<a href="#">SD-C195-104</a>	Megan O' Malley	Individual
<a href="#">SD-C195-105</a>	Adele Geoghegan	Individual
<a href="#">SD-C195-106</a>	Ewelina Pawlik	Individual
<a href="#">SD-C195-107</a>	Ewelina Pawlik	Individual
<a href="#">SD-C195-108</a>	E.M Hurley	Individual
<a href="#">SD-C195-109</a>	South Dublin Conservation Society	Organisation
<a href="#">SD-C195-110</a>	Lisa Sinnott	Individual
<a href="#">SD-C195-111</a>	Jeanette Moonan	Individual
<a href="#">SD-C195-112</a>	John Spain Associates	Organisation
<a href="#">SD-C195-113</a>	CAIRN Plc	Individual
<a href="#">SD-C195-114</a>	John Spain Associates	Organisation
<a href="#">SD-C195-115</a>	John Spain Associates	Organisation
<a href="#">SD-C195-116</a>	Fionn O' Neill	Individual
<a href="#">SD-C195-117</a>	Wind Mobility	Organisation
<a href="#">SD-C195-118</a>	Josephine Smyth	Individual
<a href="#">SD-C195-119</a>	People Before Profit	Organisation
<a href="#">SD-C195-120</a>	Arts Council	Organisation
<a href="#">SD-C195-121</a>	tony bamford planning	Organisation
<a href="#">SD-C195-122</a>	The King's Hospital School	Organisation
<a href="#">SD-C195-123</a>	Local Link Kildare - South Dublin	Organisation
<a href="#">SD-C195-124</a>	ERF Lucan Investment DAC	Organisation
<a href="#">SD-C195-125</a>	Enda P Conway	Individual
<a href="#">SD-C195-126</a>	BMA Planning	Organisation
<a href="#">SD-C195-127</a>	David Hughes	Individual
<a href="#">SD-C195-128</a>	Contorus Ltd	Individual
<a href="#">SD-C195-129</a>	Irish Concrete Federation	Organisation
<a href="#">SD-C195-130</a>	BOC Gases	Organisation
<a href="#">SD-C195-131</a>	NVD Limited	Organisation
<a href="#">SD-C195-132</a>	Armstrong Fenton Associates	Organisation
<a href="#">SD-C195-133</a>	CAIRN Plc	Individual
<a href="#">SD-C195-134</a>	Simon Clear & Associates	Organisation

<a href="#">SD-C195-135</a>	Armstrong Fenton Associates	Organisation
<a href="#">SD-C195-136</a>	An Post	Organisation
<a href="#">SD-C195-137</a>	Declan Hanley	Individual
<a href="#">SD-C195-138</a>	John Spain Associates	Individual
<a href="#">SD-C195-139</a>	Peter Doody	Individual
<a href="#">SD-C195-140</a>	Landmarque Property Group	Organisation
<a href="#">SD-C195-141</a>	Jones Investments Limited	Organisation
<a href="#">SD-C195-142</a>	Commons Lane Residents	Organisation
<a href="#">SD-C195-143</a>	Associated Rewinds Limited	Organisation
<a href="#">SD-C195-144</a>	CAIRN Plc	Individual
<a href="#">SD-C195-145</a>	Moyville residents Association	Organisation
<a href="#">SD-C195-146</a>	WORK Residents Association	Organisation
<a href="#">SD-C195-147</a>	Declan Dunne	Individual
<a href="#">SD-C195-148</a>	Rebecca O Connor	Individual
<a href="#">SD-C195-149</a>	Joseph Scully	Individual
<a href="#">SD-C195-150</a>	Jones Investments Limited	Organisation
<a href="#">SD-C195-151</a>	Armstrong Fenton Ltd	Organisation
<a href="#">SD-C195-152</a>	Dublin City sports and social club	Organisation
<a href="#">SD-C195-153</a>	Hibernia REIT	Organisation
<a href="#">SD-C195-154</a>	Tallaght Community Council	Organisation
<a href="#">SD-C195-155</a>	Brendan Stynes	Individual
<a href="#">SD-C195-156</a>	Avison Young (on behalf of Tesco Ireland Limited)	Organisation
<a href="#">SD-C195-157</a>	Cape Wrath Hotel Unlimited Company	Individual
<a href="#">SD-C195-158</a>	Simon Clear & Associates	Organisation
<a href="#">SD-C195-159</a>	Colm McGrath	Individual
<a href="#">SD-C195-160</a>	Charles Greene	Individual
<a href="#">SD-C195-161</a>	Hines Real Estate Ireland Limited	Organisation
<a href="#">SD-C195-162</a>	Tom Phillips + Associates	Organisation
<a href="#">SD-C195-163</a>	Gas Networks Ireland	Organisation
<a href="#">SD-C195-164</a>	Denise Delappe	Individual
<a href="#">SD-C195-165</a>	Kerron Ó Luain	Individual
<a href="#">SD-C195-166</a>	Galco Steel Ltd	Organisation
<a href="#">SD-C195-167</a>	Wanderers GAA Club	Organisation
<a href="#">SD-C195-168</a>	Cape Wrath Hotel Unlimited	Organisation
<a href="#">SD-C195-169</a>	Greenogue Management	Organisation
<a href="#">SD-C195-170</a>	Dublin Cycling Campaign	Organisation
<a href="#">SD-C195-171</a>	Gary Gill	Individual
<a href="#">SD-C195-172</a>	Kelland Homes	Organisation
<a href="#">SD-C195-173</a>	Greenogue	Organisation
<a href="#">SD-C195-174</a>	Gary Gill	Individual
<a href="#">SD-C195-175</a>	St. Finian's GAA Club and Mr Con McCarthy	Individual
<a href="#">SD-C195-176</a>	Manahan Planners	Organisation
<a href="#">SD-C195-177</a>	JMC Vans Trans Limited	Organisation
<a href="#">SD-C195-178</a>	Pat Grimes	Individual
<a href="#">SD-C195-179</a>	Circle K Ireland Energy Group Limited	Organisation

<a href="#">SD-C195-180</a>	Paul O'Connell	Individual
<a href="#">SD-C195-181</a>	Electricity Supply Board	Organisation
<a href="#">SD-C195-182</a>	Circle K Ireland Energy Group Limited	Organisation
<a href="#">SD-C195-183</a>	Manahan Planners	Organisation
<a href="#">SD-C195-184</a>	Circle K Ireland Energy Group Limited	Organisation
<a href="#">SD-C195-185</a>	Theresa O' Neill	Individual
<a href="#">SD-C195-186</a>	Circle K Ireland Energy Group Limited	Organisation
<a href="#">SD-C195-187</a>	SDCSP	Organisation
<a href="#">SD-C195-188</a>	Circle K Ireland Energy Group Limited	Organisation
<a href="#">SD-C195-189</a>	Circle K Ireland Energy Group Limited	Organisation
<a href="#">SD-C195-190</a>	Joan Brennan	Individual
<a href="#">SD-C195-191</a>	Debbie Garrett	Individual
<a href="#">SD-C195-192</a>	Killeen Motor Group .	Individual
<a href="#">SD-C195-193</a>	Sherri Brennan	Individual
<a href="#">SD-C195-194</a>	John and Frank Gargan	Individual
<a href="#">SD-C195-195</a>	Eamonn Prenter	Individual
<a href="#">SD-C195-196</a>	Ne Graver	Individual
<a href="#">SD-C195-197</a>	John and Barry Gargan	Individual
<a href="#">SD-C195-198</a>	Dr JF Leader	Individual
<a href="#">SD-C195-199</a>	Sally Graver	Individual
<a href="#">SD-C195-200</a>	Darragh Owens	Individual
<a href="#">SD-C195-201</a>	John Spain Associates	Individual
<a href="#">SD-C195-202</a>	Patrick Quinn	Individual
<a href="#">SD-C195-203</a>	John Spain Associates	Individual
<a href="#">SD-C195-204</a>	Jim Brogan Planning and Development Consultant	Organisation
<a href="#">SD-C195-205</a>	Land Development Agency	Organisation
<a href="#">SD-C195-206</a>	Kevin Rodgers	Individual
<a href="#">SD-C195-207</a>	Quintain Developments Ireland Limited	Organisation
<a href="#">SD-C195-208</a>	Iarnród Éireann / Irish Rail	Organisation
<a href="#">SD-C195-209</a>	Avison Young	Organisation
<a href="#">SD-C195-210</a>	Dublin Commuter Coalition	Organisation
<a href="#">SD-C195-211</a>	Fáilte Ireland National Tourism Development Authority	Organisation
<a href="#">SD-C195-212</a>	Jim Brogan Planning and Development Consultant	Organisation
<a href="#">SD-C195-213</a>	An Taisce	Organisation
<a href="#">SD-C195-214</a>	Brock McClure Planning and Development Consultants	Organisation
<a href="#">SD-C195-215</a>	Simon Clear & Associates	Organisation
<a href="#">SD-C195-216</a>	O'Flynn Group	Organisation
<a href="#">SD-C195-217</a>	James McInerney	Individual
<a href="#">SD-C195-218</a>	Simon Clear & Associates	Organisation
<a href="#">SD-C195-219</a>	BirdWatch Ireland	Organisation
<a href="#">SD-C195-220</a>	Niall Healy	Individual
<a href="#">SD-C195-221</a>	Butterfield District Residents' Association	Organisation

<a href="#">SD-C195-222</a>	Tallaght Community Council	Organisation
<a href="#">SD-C195-223</a>	Brittas Community Association	Organisation
<a href="#">SD-C195-224</a>	Hooke & MacDonald	Organisation
<a href="#">SD-C195-225</a>	An Claiomh Glas	Organisation
<a href="#">SD-C195-226</a>	Clonburris Infrastructure	Organisation
<a href="#">SD-C195-227</a>	Office of the Planning Regulator	Organisation
<a href="#">SD-C195-228</a>	Pamela Kearns	Staff member
<a href="#">SD-C195-229</a>	Glenveagh Properties	Organisation
<a href="#">SD-C195-230</a>	Tallaght Community Council	Organisation
<a href="#">SD-C195-231</a>	Linda Curran	Individual
<a href="#">SD-C195-232</a>	Peter McVerry Trust	Organisation
<a href="#">SD-C195-233</a>	Cheeverstown House	Organisation
<a href="#">SD-C195-234</a>	Development Applications Unit	Organisation
<a href="#">SD-C195-235</a>	McCann Fitzgerald	Organisation
<a href="#">SD-C195-236</a>	Circle K Ireland Energy Group Limited	Organisation
<a href="#">SD-C195-237</a>	Caitriona McClean	Individual
<a href="#">SD-C195-238</a>	South Dublin Chamber	Organisation
<a href="#">SD-C195-239</a>	Ciaran Costelloe	Individual
<a href="#">SD-C195-240</a>	Pamela Kearns	Staff member
<a href="#">SD-C195-241</a>	Pamela Kearns	Staff member
<a href="#">SD-C195-242</a>	Pamela Kearns	Staff member
<a href="#">SD-C195-243</a>	Pamela Kearns	Staff member
<a href="#">SD-C195-244</a>	Castlethorn Construction	Organisation
<a href="#">SD-C195-245</a>	National Transport Authority	Organisation
<a href="#">SD-C195-246</a>	Josephine Smyth	Individual
<a href="#">SD-C195-247</a>	Armstrong Fenton Ltd	Organisation
<a href="#">SD-C195-248</a>	Four Districts Woodland Habitat Group	Organisation
<a href="#">SD-C195-249</a>	Bairbre Brennan	Individual
<a href="#">SD-C195-250</a>	O'Flynn Group	Organisation
<a href="#">SD-C195-251</a>	Cllr Trevor Gilligan PC	Staff member
<a href="#">SD-C195-252</a>	Cllr Trevor Gilligan PC	Staff member
<a href="#">SD-C195-253</a>	Wind Energy Ireland	Organisation
<a href="#">SD-C195-254</a>	Deputy Emer Higgins	Individual
<a href="#">SD-C195-255</a>	Ne Graver	Individual
<a href="#">SD-C195-256</a>	Department of Education & Skills	Organisation
<a href="#">SD-C195-257</a>	Diarmuid Phelan	Individual
<a href="#">SD-C195-258</a>	Brian Nolan	Individual
<a href="#">SD-C195-259</a>	LOKRA	Organisation
<a href="#">SD-C195-260</a>	Irish Traveller Movement	Organisation
<a href="#">SD-C195-261</a>	Jeannette & Brian Beehan	Individual
<a href="#">SD-C195-262</a>	Declan Claffey	Individual
<a href="#">SD-C195-263</a>	Smashing Times International Centre for the Arts and Equality	Organisation
<a href="#">SD-C195-264</a>	Ne Graver	Individual
<a href="#">SD-C195-265</a>	Deirdre tierney	Individual
<a href="#">SD-C195-266</a>	Christine Noonan	Individual
<a href="#">SD-C195-267</a>	Declan Claffey	Individual

<a href="#">SD-C195-268</a>	Brian Nolan	Individual
<a href="#">SD-C195-269</a>	John O'Leary	Individual
<a href="#">SD-C195-270</a>	alistair mullan	Individual
<a href="#">SD-C195-271</a>	MCG Planning	Organisation
<a href="#">SD-C195-272</a>	NIALL BYRNE	Individual
<a href="#">SD-C195-273</a>	Ashleigh D'Arcy	Individual
<a href="#">SD-C195-274</a>	Neal Costelloe	Individual
<a href="#">SD-C195-275</a>	Eoin Ó Broin	Staff member
<a href="#">SD-C195-276</a>	Karen Garry	Individual
<a href="#">SD-C195-277</a>	John Coleman	Individual
<a href="#">SD-C195-278</a>	Seán Healy	Individual
<a href="#">SD-C195-279</a>	Ballyboden Tidy Towns Group	Organisation
<a href="#">SD-C195-280</a>	Susan Healy	Individual
<a href="#">SD-C195-281</a>	Dublin Friends of the Earth	Organisation
<a href="#">SD-C195-282</a>	David Kennedy	Individual
<a href="#">SD-C195-283</a>	Finnstown Abbey Residents Association	Organisation
<a href="#">SD-C195-284</a>	Clare Hamilton	Individual
<a href="#">SD-C195-285</a>	Eugene McElhinney	Individual
<a href="#">SD-C195-286</a>	Belgard Area Residents Association	Organisation
<a href="#">SD-C195-287</a>	Matt MacCullagh	Individual
<a href="#">SD-C195-288</a>	Seamus Brady	Individual
<a href="#">SD-C195-289</a>	M. F Dineen	Individual
<a href="#">SD-C195-290</a>	M. F Dineen	Individual
<a href="#">SD-C195-291</a>	Eamonn Heffernan	Individual
<a href="#">SD-C195-292</a>	John Bird	Individual
<a href="#">SD-C195-293</a>	Jacinta Doyle	Individual
<a href="#">SD-C195-294</a>	Brother Nicholas Smith	Individual
<a href="#">SD-C195-295</a>	Councillor Lynn McCrave	Individual
<a href="#">SD-C195-296</a>	Councillor Lynn McCrave	Individual
<a href="#">SD-C195-297</a>	Councillor Lynn McCrave	Individual
<a href="#">SD-C195-298</a>	Councillor Lynn McCrave	Individual
<a href="#">SD-C195-299</a>	James McInerney	Individual
<a href="#">SD-C195-300</a>	James McInerney	Individual
<a href="#">SD-C195-301</a>	Peter Keenahan	Individual
<a href="#">SD-C195-302</a>	Department of Public Health Health Service Executive	Individual



## Part 2 Submissions from the OPR, EMRA and NTA

Section 12(4)(b) of the Planning and Development Act 2000 (as amended) requires the Chief Executive's Report to summarise the submissions or observations made by all persons and bodies. It is also specified that this shall include issues raised by the Office of the Planning Regulator, the relevant regional authority and the NTA.

In view of these specific requirements and their strategic nature, the submissions and observations of the Office of the Planning Regulator, the Eastern and Midland Regional Assembly and the National Transport Authority are identified separately below and summarised under the relevant sections and headings that pertain to the Draft County Development Plan.

Each summarised item is followed by the responses and recommendations of the Chief Executive.

### 2.1. Observations, Submission and Recommendations from the Office of the Planning Regulator (OPR) - Submission SD-C195-227

#### Introduction

- The Office strongly commends the emphasis on addressing the needs of climate change throughout the draft Plan, in particular the positive approaches for green infrastructure and more sustainable travel patterns. The planning authority is also commended for the evidence-based approach supporting the policies and objectives in the draft Plan which include, inter alia, a land capacity analysis, infrastructural assessment and asset-based analysis.
- The Office has evaluated and assessed the draft Plan under the provisions of sections 31AM(1) and (2) of the *Planning and Development Act 2000*, as amended (*the Act*) and the contents of the submission set out the following format:

Recommendations issued by the Office relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28. As such, the planning authority is required to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

Observations take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are required to ensure alignment with policy and legislative provisions. The planning authority is requested by the Office to action an observation.

A submission also can include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. The planning authority is requested by the Office to give full consideration to the advice contained in a submission.

#### Overview

The Office welcomes the policies and objectives in the draft Plan promoting the RSES principles of '*healthy placemaking*' and the '*10-minute settlement concept*'.

The Office strongly commends the planning authority for the profile given to climate action in the draft Plan and the transparency provided regarding policies and objectives that have the potential to reduce Greenhouse Gas (GHG) emissions.



In this regard, the inclusion of analysis on modes of travel at neighbourhood level and targets promoting more sustainable mode share for walking, cycling and public transport are extremely positive aspects of the draft Plan. The Office considers that the overall approach to climate action and sustainable transport in the draft Plan represents best practice.

Notwithstanding the overall quality of the draft Plan, the Office has identified a small number of areas which require further consideration in order to more fully align the development framework for the county within the current national and regional policy context.

- The population and housing targets in the draft Plan should clearly identify the growth targets for the 6-year plan period consistent with the *Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities (2020)*.
- A more sustainable level of growth for Newcastle and Rathcoole consistent with National Policy Objective (NPO 9) should also be provided for to ensure that appropriate services and facilities are available to serve new communities in these settlements.
- In respect of the capacity of zoned land in the draft Plan that could accommodate residential development, the Office welcomes the policies and objectives for monitoring of housing growth and active land management, however further clarity is required in relation to the potential housing yield figures in Core Strategy Table 9 and potential redistribution of housing and population figures (Policy CS3 and related objectives).

The submission sets out 9 recommendations and 13 observations which are detailed below:

#### **CE Response:**

##### **Introduction and Overview:**

The introductory points raised by the OPR are noted and welcomed. The format and content of the submission are noted in particular the requirements in regard to Recommendations and Observations. In line with the format of the submission the response has been set out to correspond to each of the specific items raised.

##### **CE Recommendation:**

No Change to the Draft Plan

##### **Core Strategy and Settlement Strategy:**

- The Office considers that the total County population projections to 2028 in Tables 4 and 10 of the Core Strategy are generally consistent with the population prescribed for the County in the RSES and the NPF, as adjusted according to the transitional arrangements allowed for in the NPF Implementation Roadmap for headroom.
- The planning authority is commended for preparing housing supply target (HST) figures and apportioning these across the various neighbourhood areas / settlements in the county settlement hierarchy. The Office notes that the HST figure (17,817 households) in Table 7 appears to be based on a 7.75 year period rather than the anticipated development plan period. The Office considers that the HST figure for the six-year plan period is in the region of 15,000 housing units.

- As such, the planning authority is required to review its HST figures making the necessary adjustments to the figures in the core strategy tables for the plan period consistent with the section 28 *Housing Supply Target Methodology for Development Planning Guidelines for Planning Authorities (2020)* including Appendix 1.

### OPR Recommendation 1

#### **Recommendation 1 – Housing Supply Targets**

Having regard to the section 28 *Housing Supply Target Methodology for Development Planning Guidelines for Planning Authorities (2020)* including Appendix 1, and *Circular Letter Housing 14/2021*, the planning authority is required to revise Core Strategy Table 7 to provide Housing Supply Target (HST) figures calculated in accordance with the methodology for the 6-year plan period, amend Core Strategy Tables 9 and 10 accordingly, and review the allocations for settlements over the plan period in line with the overall HST for the county.

The planning authority may also consider it necessary to review the draft Housing Strategy and Housing Needs Demand Assessment in light of the finalisation of the Housing Supply Target in accordance with the methodology as per the above.

### **Core Strategy and Settlement Strategy Recommendation 1:**

#### **CE Response:**

The issues raised in regard to section 28 *Housing Supply Target Methodology for Development Planning Guidelines for Planning Authorities (2020)* including Appendix 1, and *Circular Letter Housing 14/2021* and the Core Strategy are noted. It was the intention of the Planning Authority to update the Core Strategy figures in line with the most up to date census construction data prior to the finalisation of the plan. In using such 'known' information it was considered that each stage of the plan making process would provide for factually correct figures and result in a more accurate account of existing construction activity within the County.

While the above should be noted the requirements of the Regulator are acknowledged and the following measures have been taken to remedy the figures within Chapter 2 to align with the 6-year plan period 2022 – 2028. Full details of this are set out in Appendix 1 attached to this report but are summarised as follows:

#### **1. Table 7 - South Dublin Housing Demand Figures 2022 – 2028**

Table 7 has been adjusted such that Row B details housing supply figures for the period 2017 to Q3 2022 (Plan adoption August 2022) which has added 640 units (known construction figures for Q1-Q3 2021) and an estimated delivery of 1600 units between Q3 2021 and Q3 2022 resulting in the housing supply figure increasing from 5914 to 8,154. The knock-on effect of this is Row D 'Housing Demand' reducing from 17,817 units over a period of 7.75 years to 15,576 units over the plan period 6 years.

#### **2. Core Strategy Table 9 – Capacity of undeveloped lands within South Dublin**

Arising from the adjustments to Table 7 above and the input of 640 units (known construction figures for Q1-Q3 2021) and the estimated delivery of 1,600 units between Q3 2021 and Q3 2022, Table 9 has been adjusted and redistributed to take account of known construction activity between Q1 and Q3 2021 and estimated delivery (1,600 units) within each neighbourhood. This has resulted in an overall reduction in Greenfield lands of 36.82ha and a reduction of Brownfield lands of 2.7ha.

### 3. Core Strategy Table 10

Arising from the adjustments to Tables 7 and 9 above. The Core Strategy Table 10 has been adjusted to reflect the known construction activity of 640 between Q1 and Q3 2021 (inclusive) and the estimated delivery of 1,600 units between Q3 2021 and Q3 2022. This has resulted in the following adjustments, see Figure 1 below for simplified breakdown.

**Figure 1 - Simplified breakdown of Table 10 of the Draft Plan**

Settlement	Neighbourhood Area	Current Allocation Units Q4 2020	Reduction in Units	Revised Allocation
<b>Dublin City and Suburbs</b>				
	Lucan	3322	649	2673
	Clondalkin	5385	196	5189
	Naas Road	1010	0	1010
	Tallaght	2000	135	1865
	Templeogue Firhouse etc	1953	276	1677
	Citywest/Fortunestown	2833	720	2113
	Sub Total	16,503	1,976	14527
<b>Self Sustaining Town</b>	Saggart	96	0	165
<b>Self Sustaining Growth Town</b>	Newcastle	638	240	398
<b>Self Sustaining Growth Town</b>	Rathcoole	580	24	487
	Sub Total	1,314	264	1,050
	<b>Total Required</b>	<b>17817</b>	<b>2,240</b>	<b>15,576</b>

Table 10 Core Strategy aligns with the housing demand figure for the 6-year plan period providing for a figure of 15,576 in line with the HST methodology set out in Table 7.

### 4. The following adjustments and amendments to Appendix 2 Part 1 of the Draft Plan

- A. Adjustment to Table 2 to reflect the 6 year life of the plan.
- B. Adjustments to the first 3 paragraphs on Page 7 (text edit required highlighted in bold) to reflect the most up to date construction figures and land capacity on foot of this response.

C. Part 1D: Deliverability

Paragraphs 5 and 6: Amendments will be made to reflect the most up to date construction figures and land capacity on foot of this response.

5. The following adjustments and amendments to the Appendix 2 Part 2 \*(Core Strategy Methodology

A. Table 8 : Methodology for the application of Housing [Worked Example 4]

From:

**Table 8:** Methodology for the application of Housing [Worked Example 4]

South Dublin County Council		Annual Average	Total Households
A	ESRI NPF: 50:50 City Scenario projected new household demand 2017 to Q3 2026	1,950	19,009
B	ESRI NPF Scenario 2026 Q4 - 2028 Q3 remaining Dev Plan period.	1,384	2,768
C	Total provision 2017 up to Q3 2028.	1,815	21,777
D	Homeless households, and unmet demand as at most recent Census.	0	2,050
E	Actual new housing supply 2017 to end of 2020, prior to Plan commencement.	1,479	5,914
F	<b>Housing Demand</b> = Total (C+B+C)/7.75yrs 2021 – 2028 Q3 (Projected ESRI NPF demand - new completions) + Unmet demand	2,311	17,913
G	<b>Potential adjustment 1</b> to end 2026 portion of plan period to facilitate convergence to NPF strategy (where justified)		
H	ESRI NPF scenario projected scenario projected new household demand 2017 to Q3 2026	1,930	18,816
I	Mid-point between A and H - ESRI NPF and baseline scenarios, to Q3 2026	1,940	18,912
J	Adjusted new household demand calculation 2017 – Q3 2028 (I +B + D)	2,020	23,730
K	<b>Adjusted Housing Demand</b> = Total (J minus E)/7.75yrs 2021 – 2028 Q3 (Projected ESRI NPF demand - new completions) + Unmet demand	2,299	17,817

To:

South Dublin County Council		Annual Average	Total Households
A	ESRI NPF: 50:50 City Scenario projected new household demand 2017 to Q3 2026	1,950	19,009
B	ESRI NPF Scenario 2026 Q4 - 2028 Q3 remaining Dev Plan period.	1,384	2,768
C	Total provision 2017 up to Q3 2028.	1,815	21,777
D	Homeless households, and unmet demand as at most recent Census.	0	2,050
E	Actual new housing supply 2017 to <b>Q3 2022</b> , <del>end of 2020</del> , prior to Plan commencement.	<del>1,479</del> <b>1,359</b>	<del>5,914</del> <b>8,154</b>
F	<b>Housing Demand</b> = Total (C-E+D)/6yrs 2021 – 2028 Q3 (Projected ESRI NPF demand – new completions) + Unmet demand	<del>2,311</del> 2,612	<del>17,913</del> 15,673
G	<b>Potential adjustment</b> 1 to end 2026 portion of plan period to facilitate convergence to NPF strategy (where justified)		
H	ESRI NPF scenario projected scenario projected new household demand 2017 to Q3 2026	1,930	18,816
I	Mid-point between A and H - ESRI NPF and baseline scenarios, to Q3 2026	1,940	18,912
J	Adjusted new household demand calculation 2017 – Q3 2028 (I +B + D)	2,020	23,730
K	<b>Adjusted Housing Demand</b> = Total (J minus E)/ <del>7.75</del> <b>6</b> yrs 2021 – 2028 Q3 (Projected ESRI NPF demand - new completions) + Unmet demand	<del>2,299</del> <b>2,596</b>	<del>17,817</del> <b>15,576</b>

B. Adjust text after table 8 on page 6

The 2022 – 2028 Development Plan is anticipated to come into force Quarter 3 of 2022 for a period of 6 years. On this basis, the household need is projected up to Q3 2028, or ~~7.75~~ 6 years

### C. Newcastle Asset Based Analysis

General Adjustment and update to figures set out in Sections 1. Scale; 4. Placemaking; and 9. Analysis, to align with revised Housing Supply Target and knock-on effects arising from Recommendations 3 and 4 and Observation 3 below.

### D. Rathcoole Asset Based Analysis

General Adjustment and update to figures set out in Sections 1. Scale; 4. Placemaking; and 9. Analysis, to align with revised Housing Supply Target and knock-on effects arising from Recommendations 3 and 4 and Observation 3 below.

### Core Strategy and Settlement Strategy Recommendation 2:

The Office welcomes the extent of information provided in the Core Strategy tables which includes potential housing yield from undeveloped greenfield and brownfield sites. However, the planning authority's attention is drawn to the requirement in sections 10(2A)(c) and (d) of the Act for core strategies to include information on the area of land both (a) already zoned, and (b) proposed to be zoned for residential use or a mix of residential and other uses.

### Recommendation 2

#### Recommendation 2 - Core Strategy Table

In accordance with section 10 (2A) of the *Planning and Development Act 2000* (as amended), and having regard to the *Guidance Note on Core Strategies* (2010), the planning authority is required to supplement the core strategy table(s) in Chapter 2 of the draft Plan with the following:

- (i) in respect of the area in the development plan already zoned for residential use or a mixture of residential and other uses, provide details of the size of the area in hectares, and the proposed number of housing units to be included in the area broken down at neighbourhood area / settlement level;
- (ii) confirm the density assumptions used to calculate the land area requirements for each neighbourhood area / settlement over the plan period; and
- (iii) amend the figures for total land (HA) and total housing (units) to coincide with plan period rather than 2021 – 2028.

[*Development Plans, Guidelines for Planning Authorities, Consultation Draft (August 2021)* (Appendix A) provides a useful reference and illustrative example of a core strategy table.]

### CE Response:

The issues raised by the OPR are noted in regard to the extent of information provided in the Core Strategy tables which includes potential housing yield from undeveloped greenfield and brownfield sites. In this regard the requirements of Sections 10 2A are noted which requires that Core Strategies contain information on the area of land

already zoned in the Development Plan for residential use or a mix of residential and other uses and the amount of land proposed to be zoned for such purposes.

The Core Strategy guidance note on this issue states the Core Strategy Table should summarise:

- (1) the amount of land being zoned for development of housing or a mixture of housing or a mixture of housing and other uses if such mixed-use zones permit housing,
- (2) how the amount of land specified at (1) compares to the previous zoning of such lands in the preceding development plan, and
- (3) the area or level of any shortfall or excess of lands or housing capacity.

In regard to the above the planning authority had regard to such guidelines and within Chapter 2 Core Strategy and Settlement Strategy sets out the following:

- Section 2.6.1 Land Capacity Study – detailing the extent and capacity of lands currently zoned which is based on the current 2016 Development Plan.
- Details of Strategic Long Term Development Areas (SDA's) namely Adamstown SDZ, Clonburris SDZ, Naas Road Regen Lands and Tallaght Town Centre LAP Regen Lands and the percentage of these lands which has been allocated for development over the plan period
- Land Capacity and Zoning Requirements for the County where it is stated on page 48 "Based on the housing capacity of existing undeveloped zoned land in South Dublin County, there is no requirement to zone additional land to serve the needs of population and housing targets set by the Ministerial Guidelines and the NPF Roadmap described under Sections: 2.3 (Statutory Context), 2.4 (Strategic Context - National, Regional and Ministerial Planning Policy), and 2.5 (Population and Housing Data) of this Chapter".
- The inclusion of a Land Capacity 'Table 9' which provides a breakdown of brownfield/greenfield lands suitable for residential or mixed-use development broken down by settlement/ and neighbourhood area. This includes a map of the Land Capacity Sites divided into Strategic Lands and Housing Capacity Sites.
- A Planning Analysis and Deliverability analysis which has informed the Core Strategy Table 10 which sets out that *'all existing zoned lands within the County were either Tier 1 or Tier 2 and were capable of contributing towards the achievement of the considered NSOs'*, there is a need to provide a *'balance between the deliverability of units and avoiding an overly rigid identification of specific capacity lands forms a key part of the Core Strategy. The approach taken considers the need to promote compact growth in a balanced way within each neighbourhood area according to its role and function within the settlement hierarchy', 'To achieve this objective a prioritised level of growth of undeveloped land (excluding units/land under construction) for each Neighbourhood Area based on past construction and deliverability was applied'*.

*'While the County has an excess of zoned land required to deliver the supply targets this is considered necessary to facilitate a choice in sites that come forward recognising that not all sites may be available within the plan period. The analysis carried out identified that such lands are serviced (Tier 1) and/or serviceable (Tier*

*2) and achieve a medium to high planning score. As a result, they have the potential to contribute towards sustainable development, ensuring that any obstacles to delivery in one area or site can be overcome by provision within another site or area. This will ensure sufficient lands are available to meet the supply targets identified'.*

- A core Strategy Table, Table 10 Page 54 details Settlement Type/Neighbourhood Area 2016 population/units and % share, Estimated Units built 2016 to Date/% share, The total land required over the plan period alongside Total units and % share, Total 2028 population and the population growth from 2016 to 2028.

Having regard to the above it is considered that the Core Strategy has addressed the points raised in the Core Strategy guidance and the Planning and Development Act 2000 (as amended) section 10 (2A) detailing the amount of land being zoned for housing or mixed used development, specifying that no lands over and above the zoned lands identified within the 2016 Development Plan have been provided and stating that there is an existing excess of lands within the County which is considered necessary to facilitate a choice in sites that come forward recognising that not all sites may be available within the plan period.

However, should any land be zoned for development following the consideration of the Draft Plan by the Members, it will be detailed as set out by the Office in its recommendation, showing how the lands zoned for the development of housing compare to the current 2016-2022 Development Plan.

#### **Density Assumptions:**

In regard to the issue on Density Assumptions – Section 2.2 details that the Council has assessed all appropriately zoned lands with the potential for residential development and has applied a residential density for each site in line with Ministerial Guidelines.

Section 2.6.1 of the Core Strategy sets out details in regard to the Land Capacity Analysis and refers the reader to Appendix 2A Part 1 Developing the Core Strategy. Density Frameworks were developed in accordance with national and regional planning objectives and in the context of Section 28 Ministerial Guidelines promoting higher densities, taking account of proximity to existing and proposed public transport services as set out in the 'Sustainable Residential Development in Urban Areas' (2009), 'Sustainable Urban Housing: Design Standards for New Apartments' Guidelines and 'Urban Development and Building Heights Guidelines for Planning Authorities' (2018).

The Density Frameworks criteria was tested against the recently published Circular 14/2021 which provides additional clarity in relation to Residential Densities in Towns and Villages, as set out in Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) and was deemed compliant.

Table 10 Column 6 details the land area identified for each neighbourhood area. The average density provided within Dublin City and Suburbs is 40-50 units per ha while the settlements outside this provide for c. 35units/ha.

#### **Table 10 Adjustment:**

In line with the requirements of Recommendation 1 Table 10 has been adjusted to reflect the 6 year life of the plan over the period 2022-2028

#### **CE Recommendation:**



In line with the provisions of Recommendation 1 Table 10 has been adjusted to reflect the 6-year life of the plan over the period 2022-2028. Refer to Recommendation 1 response above and Appendix 1 to the CE Report for further details.

### **Settlement Hierarchy**

The Office is satisfied that the settlement hierarchy is generally appropriate and consistent with national and regional policy including section 4.2 – Settlement Strategy, section 4.3 – Defining a Settlement Typology and chapter 5 – Metropolitan Area Strategic Plan of the RSES.

#### **CE Response:**

Noted.

#### **CE Recommendation:**

No Change to Draft Plan

### **Core Strategy and zoning for residential use**

The Office is generally satisfied with the distribution of population and housing growth across the settlement hierarchy which seeks to direct the majority of future housing growth to the Dublin City and Suburbs area of which a significant proportion is anticipated to occur on the designated Strategic Development Areas and Strategic Development Zones.

Notwithstanding the above, the Office has concerns regarding the housing allocations for Newcastle and Rathcoole and the potential for a significant breach of the 30% growth limitation provided for in NPO 9.

The Office considers that there is a need to review and amend the figures in Core Strategy Table 9 to take account of a revised HST figure for the plan period (Recommendation 1), the quantum of housing land that will be available for development over the plan period, and the effect of Recommendations 3 and 4 in respect of Newcastle, Rathcoole and Saggart. In respect of any surplus capacity identified from a review of the figures in Table 9, the planning authority is advised to have regard to the guidance and considerations for ‘Additional Provision’ of residential lands in section 4.4.3 of the draft *Development Plans Guidelines for Planning Authorities* (August 2021).

### **Observation 1**

#### **Observation 1 – Housing capacity from undeveloped zoned land**

**The planning authority is requested to review and amend the quantum of housing land that will be available for development over the plan period, and taking account of Recommendations 3 and 4 in respect of Newcastle, Rathcoole and Saggart, in order to demonstrate consistency with the revised Housing Supply Target for the plan period as required under the section 28 *Housing Supply Targets Methodology for Development Planning Guidelines for Planning Authorities* (December, 2020).**

**The planning authority is advised to have regard to the guidance and considerations for ‘Additional Provision’ of residential lands in section 4.4.3 of the draft *Development Plans Guidelines for Planning Authorities* (August 2021) regarding any additional capacity identified.**

**CE Response:**

In line with the provisions of Recommendation 1, a review of the quantum of housing land available over the lifetime of the plan has been carried out. This review demonstrates consistency with the Housing Supply Target for the plan period as required under the section 28 *Housing Supply Targets Methodology for Development Planning Guidelines for Planning Authorities* (December, 2020) as opposed to the Draft plan which applied a timeline from the date of the Draft publication and the most up to date construction figures applicable to the County. The extent of such measures is set out in summary format in the CE Response and CE Recommendation to Recommendation 1.

In addition and having regard to the provisions of Recommendations 3 and Observation 3 relating to Newcastle and Rathcoole, a sequential approach to development in line with the provisions of NPO9 has been applied which has resulted in the phasing of development in tandem with the delivery of key infrastructure and services, the designation of lands as Strategic Residential Reserve and the redesignation of lands from Res-N to Rural in both settlements.

**CE Recommendation:**

In line with the provisions of Recommendation 1 Tables 9 Land Capacity and Table 10 Core Strategy have been adjusted to reflect the 6-year life of the plan over the period 2022-2028. Refer to Recommendation 1 response above and Appendix 1 to the CE Report for further Details

**Redistribution of housing and population figures**

- The Office notes that the Core Strategy attempts to strike a balance between having an excess of zoned lands (Core Strategy Table 9) and being able to deliver new development to meet the needs of citizens acknowledging that the zoned lands are primarily within the Dublin City and Suburbs boundary.

In this regard, the Office welcomes the inclusion of policies and objectives for the monitoring of population and housing growth and active land management in particular CS3 Objective 3 which provides flexibility for the re-distribution of housing and population figures within the settlement and Neighbourhood Areas.

In the interests of transparency, the planning authority should, however, provide greater clarity in respect of how they would redistribute the housing and population figures within the settlement and neighbourhood areas and outline the implications for same in circumstances where there is the potential to exceed the settlement / neighbourhood area allocation set out under Core Strategy Table 10.

**Observation 2**

**Observation 2 – Redistribution of housing and population figures (CS3 Objective 3)**

**The intent of policy objective CS3 Objective 3 to provide flexibility in achieving the housing supply targets, with the potential for redistribution in the event of over-provision in any settlement or neighbourhood, is to be welcomed as a proactive approach to implementation of the draft Plan. The planning authority is requested, however, to clarify how it would redistribute the housing and population figures within the settlement and neighbourhood areas and outline the implications for same in circumstances where there is the potential to**

**exceed the settlement / neighbourhood area allocation set out under Core Strategy and having regard to the requirements of section 10 (2A) of the *Planning and Development Act 2000* (as amended).**

**This may include an indication of the parameters within which such re-distribution would operate, such as the degree to which the settlement or neighbourhood area allocation set out under core strategy could be exceeded by for the different areas across the county.**

**CE Response:**

As set out in section 2.6.7 Monitoring of Growth/Active Land Management the Core Strategy aims to strike a balance between having a physical excess of zoned lands and being able to deliver new development to meet the needs of citizens.

The deliverability analysis, set out in section 2.6.4, has sought to address this by recognising that in an urban environment, there will be market constraints to delivery at any given time. In this regard, a degree of flexibility has been built into the distribution of the housing and population targets, in line with national and regional policy, to ensure an adequate supply to meet demand. This flexibility requires close monitoring of housing delivery, taking account of the function of each settlement.

For monitoring at a settlement scale, the policy of this plan is to monitor each settlement, with Dublin City and Suburbs settlement as one area, with options to transfer a portion of the allocated units from one neighbourhood area to another, subject to considering a number of key criteria during the lifetime of the Development Plan. This enables for flexibility in terms of locating new housing and allows time to lapse for planning permissions which have not delivered. Equally, the Council will actively pursue active land management measures provided for under legislation, to ensure that land hoarding is discouraged, and that development potential is released through available mechanisms and initiatives including through central or other funding. Such measures are discussed under the subheadings of Vacant Sites, Compulsory Purchase Orders and Funding Mechanisms.

It is the planning authority's view that the development of a strong framework for monitoring of population and housing alongside active land management is crucial to the successful redistribution of housing and population figures within the settlement and neighbourhood areas. Such provision is supported in the Draft Plan under Policy CS3 – Monitoring Population and Housing which seeks to *Promote and facilitate housing and population growth in accordance with the overarching Core Strategy to meet the needs of current and future citizens of South Dublin County*. This provision is underpinned by a number of objectives CS3 Objectives 1-6.

Such provisions are underpinned by the following objectives:

CS3 Objective 2 to which seeks *'To implement a robust monitoring process for all housing delivery including the performance of large-scale housing developments (Schemes for 100 units+) for each neighbourhood area and settlement within the County to allow for ongoing assessment of delivery targets whilst ensuring overdevelopment*

*does not occur in any particular area and to ensure that the delivery of necessary infrastructure is possible to ensure the sustainability of communities’.*

*CS3 Objective 3 which seeks ‘To provide for flexibility in achieving the housing supply targets and meeting housing demand, the Council will consider the re-distribution of housing and population figures within the settlement and Neighbourhood Areas. In this regard, where a site greater than 0.25ha has the potential to exceed the allocation for a particular Neighbourhood Area as set out under Core Strategy Table 10, the applicant must demonstrate to the Planning Authority that the necessary social and physical infrastructure is in place or can be provided as part of the application to accommodate the proposed development.*

*The Council will monitor the delivery of housing units to ensure general compliance with the Core Strategy and housing supply targets for the County and to inform the redistribution potential outlined above*

*CS4 Objective 4 which seeks ‘To maintain and further expand the database of greenfield, brownfield and infill sites as part of the active land management process’.*

*CS3 Objective 5 which seeks to expand the existing database informing the core strategy by including a live database of land zoned for residential development that has not yet been developed including, where available, information on why this land has not been developed so as to inform future zoning and de-zoning decisions; and*

*CS3 Objective 6 which seeks ‘To ensure the phased development of new housing areas in tandem with the delivery of physical and social infrastructure provision as identified within Local Area Plans or as informed by assessments carried out by the Planning Authority’.*

It is considered that such measures will facilitate the level of flexibility required in order to achieve the housing demand target over the lifetime of the plan. This is provided for in a measured and controlled manner whereby in instances where the development of lands within a particular neighbourhood located within the Dublin City and Suburbs settlement is not forthcoming to the degree targeted in the plan, a redistribution of a level of growth can be facilitated/overcome through provision within another neighbourhood. This can only be done where it can be demonstrated that the necessary social and physical infrastructure is in place or can be provided as part of the application to accommodate the proposed development. Such reallocation cannot result in an overall exceedance of the overall county Housing Demand Target as revised under recommendation 1 of this submission.

While the above should be noted and having regard to the provisions of NPO9 it is considered that CS3 Objective 3 could be strengthened further by including reference to ensuring the totality of planning population/housing growth is aligned with the overall growth target for the County and that such development is aligned with investment in infrastructure and the provision of employment together with supporting amenities and services. This would result in CS3 Objective 3 being strengthened to read as follows:

*CS3 Objective 3 ‘To provide for flexibility in achieving the housing supply targets and meeting housing demand, the Council will consider the re-distribution of housing and population figures within the settlement and Neighbourhood Areas. In this regard, where a site greater than 0.25ha has the potential to exceed the allocation for a particular Neighbourhood Area as set out under Core Strategy Table 10, the applicant must demonstrate to the Planning*

Authority that the **proposal is aligned with the overall growth target for the County, any necessary investment in infrastructure and the provision of employment together with supporting amenities and services.** ~~necessary social and physical infrastructure is in place or can be provided as part of the application to accommodate the proposed development.~~

The Council will monitor the delivery of housing units to ensure general compliance with the Core Strategy and housing supply targets for the County and to inform the redistribution potential outlined above.

#### **CE Recommendation:**

Amend CS3 Objective 3 to read as follows:

**From:** *To provide for flexibility in achieving the housing supply targets and meeting housing demand, the Council will consider the re-distribution of housing and population figures within the settlement and Neighbourhood Areas. In this regard, where a site greater than 0.25ha has the potential to exceed the allocation for a particular Neighbourhood Area as set out under Core Strategy Table 10, the applicant must demonstrate to the Planning Authority that the necessary social and physical infrastructure is in place or can be provided as part of the application to accommodate the proposed development*

*The Council will monitor the delivery of housing units to ensure general compliance with the Core Strategy and housing supply targets for the County and to inform the redistribution potential outlined above*

To:

CS3 Objective 3 *'To provide for flexibility in achieving the housing supply targets and meeting housing demand, the Council will consider the re-distribution of housing and population figures within the settlement and Neighbourhood Areas. In this regard, where a site greater than 0.25ha has the potential to exceed the allocation for a particular Neighbourhood Area as set out under Core Strategy Table 10, the applicant must demonstrate to the Planning Authority that the **proposal is aligned with the overall growth target for the County, any necessary investment in infrastructure and the provision of employment together with supporting amenities and services.***

*The Council will monitor the delivery of housing units to ensure general compliance with the Core Strategy and housing supply targets for the County and to inform the redistribution potential outlined above.*

#### **Newcastle and Rathcoole**

The Office notes from the Asset Based Analysis (Appendix 2) that Newcastle and Rathcoole could have population figures of 7,127 and 7,975 respectively in the longer term if all the remaining capacity were to be developed.

Having regard to NPO 9, the infrastructure requirements identified in the Asset Based Assessment to support further development, the recent rapid growth of Newcastle and Rathcoole and the extent of remaining undeveloped and zoned land that could accommodate residential development, there is a need to review the extent of land available for housing development over the plan period and provide for phasing to align growth with infrastructure and services.

### Recommendation 3

#### **Recommendation 3 – Residential land zoning (Newcastle and Rathcoole)**

**Having regard to National Policy Objective 9, the recent population growth in Newcastle and Rathcoole, the infrastructure requirements identified in the Asset Based Assessment to support further development, their allocated housing units for the plan period and the extent of remaining undeveloped and zoned land that could accommodate residential development in these settlements, the planning authority is required to review the extent of land zoned RES-N and change any surplus land without benefit of planning permission, and which provides for population growth exceeding 30% above the 2016 census figure, to strategic residential reserve. This is required to ensure that the growth of these settlements over the plan period has regard to their limited public transport provision and current deficits in social services in particular for education.**

**This review should also take account of any plan-making justification test undertaken for Flood Zone A and B lands (Recommendation 8).**

The Office further considers that policy CS9 (Newcastle) and CS9 Objectives 1 – 3, and policy CS10 (Rathcoole) and CS10 Objectives 1 – 3, should be further strengthened to support incremental growth to align with infrastructure and services.

### Observation 3

#### **Observation 3: Policy and objectives for Newcastle and Rathcoole**

**Having regard to the need for Newcastle and Rathcoole to develop at an incremental pace, based on the delivery of social, physical and transport infrastructure and services as stated in the Core Strategy (pages 72 and 73), the planning authority is requested to strengthen the policy and objectives to reflect the need to support incremental growth to align with infrastructure and services.**

### **CE Response:**

The issues raised with regard to the settlements of Newcastle and Rathcoole are noted. To address the concerns raised this response has been divided into two parts 1) Rathcoole Self Sustaining Growth Town and 2) Newcastle Self Sustaining Growth Town.

The response for each settlement has involved a review of the extent of land zoned RES-N, recognition of the provisions of NPO9 of the National Planning Framework, Infrastructural Requirements within each area, alignment with overall housing supply targets (as per Recommendation 1 above) and the development of a coordinated strategy that ensures alignment with investment infrastructure and the provision of employment together with supporting amenities and services.

It is noted that the provisions of NPO9, whereby settlements not identified in Policy 2a or 2b of the NPF (Newcastle and Rathcoole fit this criteria) may be identified for significant rates of population growth – outlined as 30% or above 2016 population levels – provided that it is subject to agreement with the regional assembly, balanced with strategies for other urban and rural areas to be in line with the overall growth target and subject to a co-ordinated strategy ensuring alignment with investment with infrastructure and the provision of employment, together with supporting amenities and services. Prior to the publication of the Draft Plan, and to the allocation of growth targets for Rathcoole and Newcastle, the planning authority engaged with the planning team from the regional assembly and an assets-based assessment was prepared for each town. In this regard the submission from the regional assembly to the Draft plan is worth noting where in referring to the future development of the two settlements of Newcastle and Rathcoole the assembly have recommended that a phased approach be taken in the development of these lands in line with the recommendations of the NPF and RSES.

### Rathcoole:

In line with the provisions of NPO 9 and the need to ensure alignment with investment in infrastructure and the provision of employment, together with supporting amenities and services it is proposed to apply a phased approach to development in Rathcoole.

Such phasing proposals aim to recognise the importance of lands to the Southeast of the village centre and the preparation of a Masterplan to provide for social and affordable housing along with a new school and a library. Following further examination, it was found that the habitat on the originally proposed lands was an Annex 1 habitat and in order to facilitate the delivery of social and affordable housing, a school and further pitches in the area, the lands were examined having regard to CS10 SLO1 in the Draft Plan. The proposed relocation of the land zoning has facilitated the ability to maintain important habitat while ensuring that necessary infrastructure for Rathcoole is delivered and is accessible from the village core. Furthermore, the currently zoned residential lands to the west at Tootenhill comprise of a live planning application. Such lands shall be required to deliver local road upgrades and connections in this area, provide for an appropriately landscaped riparian corridor to the eastern boundary and to ensure that any such development proposal accommodates the required road reservation for a Western Orbital Route.

Having regard to the above the following sets out the proposals for the settlement of Rathcoole that addresses the issues raised by the OPR. This response is supplemented by Appendix 1 to this CE Report and is presented in summary format below:

- Arising from recommendation 1 of the OPR submission Table 9: Capacity of undeveloped lands within South Dublin and Table 10: Core Strategy Table 2022-2028 have been amended. Refer to Appendix 1 for further details.
- The overall land capacity in Table 9 for Rathcoole in hectares (ha) has been reduced by c. 0.6ha from 27.54ha to 26.94ha. Include an asterisk to ‘Note: the 26.94ha includes 2ha of Strategic Residential Reserve lands’.
- Rathcoole is provided with a reduced housing target in Table 10 from 580 units to 487 units over the 6-year lifetime of the plan i.e.2022-2028
- The zoning map for the area now comprises of Phase 1 lands which will be indicated by a specific local objective on the lands (SLO).

- Further 2ha of lands have been identified as Strategic Residential Reserve and will be displayed as an objective ‘*To protect and safeguard strategic residential reserve lands for potential future residential growth beyond the lifetime of the plan*’ on map 7 identified by hatched markings overlaid onto the underlying zoning objective.
- Lands measuring c. 0.6ha to the southwest of the town to be rezoned from Res-N to RU (rural)
- Phase 1 Lands A: Phase 1 (adjacent to Rathcoole Park) residential lands to be delivered in tandem with the delivery of a new access road, new primary school, a library hub on the RES-N zoned lands and three sports pitches and sports pavilion on the adjoining Open Space zoned lands.
- Phase 1 Lands B: Phase 1 lands subject to the necessary road upgrades to the west of the site being delivered in tandem with development. Development shall also provide for an appropriately landscaped riparian corridor along the eastern boundary of the subject lands and associated landscaping throughout the site. The development of these lands shall also be subject to a specific local objective in regard to the reservation of land to facilitate the western orbital route.

#### **CE Recommendation:**

#### **Amend the following sections of the Core Strategy.**

- Table 9: Capacity of undeveloped lands within South Dublin and Table 10: Core Strategy Table 2022-2028. Refer to Appendix 1 for further details.
- The removal of CS10 SLO 1 and the inclusion of a new Objective under CS10 – CS10 Objective 4 and three new specific local objectives (SLOs) which will also be included on the Development Plan maps 7 and 8:

**CS10 Objective 4:** To facilitate the delivery of new residential development in coordinated manner, ensuring alignment with investment infrastructure and supporting amenities and services. Such measures shall be delivered through appropriate phasing in line with CS10 SLO1 and SLO2.

**CS10 SLO1** to be inserted on the lands adjacent to Rathcoole Park: *To ensure that the provision of a primary school, library hub, 2 full sized GAA pitches and 1 junior pitch and associated pavilion, access road and open space is provided in tandem with new residential development.*

**CS10 SLO2** to be inserted on lands to the west of Rathcoole: *To ensure the delivery of the necessary upgrades to the existing road to the west of the site being delivered in tandem with development. Development shall also provide for an appropriately landscaped riparian corridor along the eastern boundary of the subject lands and associated landscaping throughout the site.*

In addition to the above the subject lands shall be subject to a specific Transport SLO re. the Western Orbital Road, to be placed in Chapter 7, Sustainable Movement and on the relevant development plan maps as follows:

*SM5 SLO 2: To ensure that development of Phase 1 lands at Tootenhill (Rathcoole) accommodates the required road reservation for a Western Orbital Route.*

Amend Map 7 to overlay a new map-based objective ‘*To protect and safeguard strategic residential reserve lands for potential future residential growth beyond the lifetime of the plan*’ on the underlying Res- N zoning on lands to the west of Rathcoole



## Newcastle:

### CE Response:

In line with the provisions of NPO 9 and the need to ensure alignment with investment in infrastructure and the provision of employment, together with supporting amenities and services it is proposed to apply a phased approach to development in Newcastle.

The identification of lands for such phasing has been informed by applying a sequential approach to development from the village core to the north and south, recognition of ongoing construction activity and the delivery of key infrastructure identified in the Newcastle Local Area Plan. Such phasing proposals facilitate the delivery of; lands to the north at Burgage North providing for a new local park and two connections to the village core, lands to the northwest facilitating the delivery of an extension to St. Finian's Community Centre while development of lands to the South at Burgage South/Taobh Chnoic will facilitate the delivery of a new connections to the village core, a new urban park/square, the completion of the east west link street (already partly constructed at Ballynakelly), parklands to the south at Taobh Chnoic, Sean Feirm park and part of Tower House Park to the west.

Having regard to the above the following sets out the proposals for the settlement of Newcastle that addresses the issues raised by the OPR. This response is supplemented by Appendix 1 to this CE Report and is presented in summary format below:

- Arising from recommendation 1 of the OPR submission Table 9: Capacity of undeveloped lands within South Dublin and Table 10: Core Strategy Table 2022-2028 have been amended. Refer to Appendix 1 for further details.
- The overall land capacity in hectare (ha) has been reduced from 25.33ha to 19.9ha
- Newcastle is provided with a reduced housing target in Table 10 from 638 units to 398 units over the 6-year lifetime of the plan i.e.2022-2028
- The zoning map for the area now comprises of Phase 1 lands and Phase 2 lands both of which will be indicated by an SLO, lands identified as Strategic Residential Reserve which will be displayed on the development plan map as an objective and the redesignation of lands to the west along the Kiltel road from Res-N to RU
- Phase 1 Lands: Phase 1 residential lands to be delivered in tandem with the delivery of key infrastructure specific to the subject lands.

Burgage North Block 1: Development to be carried out in tandem with the delivery of 2 new street connections to main street and the provision of a new local park c. 0.3ha.

Burgage North Block 2: Development to be carried out in tandem with the delivery of lands to facilitate an extension to St. Finian's Community Centre.

Burgage South/Taobh Chnoic Block 3: A sequentially phased programme to be submitted alongside any planning application on the subject lands which provides for the delivery of the following in tandem with development or as described 1) No more than 200 units to be permitted before the commencement of the remaining lands of c. 1.4ha to provide for the full Taobh Chnoic Park to the south 2) Urban Park/Square c. 1ha in size (Burgage South Park), 3) East-West Link Street, 4) Sean Feirm Park c. 0.2ha in size, 5) a portion of

Tower House Park c. 0.1ha. All applications shall demonstrate to the satisfaction of the Planning Authority how they are supporting the delivery of North South Street connections to the Main Street.

With regards delivery of a new primary school at Taobh Chnoic, the timing of this will be subject to educational needs in consultation with the Department of Education. Prior to completion of 200 units confirmation to be provided from the Department of Education on the transfer of lands to provide for the school, subject to their confirmation of need.

- Phase 2 Lands: To only facilitate the delivery of Phase 2 residential lands once identified infrastructure comprising of the Urban Park/Square c. 1ha in size, the additional 1.4ha for Taobh Chnoic Park and the East/West Link Street required within Phase 1 have been delivered to the satisfaction of the Planning Authority.

#### **CE Recommendation:**

#### **Amend the following sections of the Core Strategy.**

- Table 9: Capacity of undeveloped lands within South Dublin and Table 10: Core Strategy Table 2022-2028. Refer to Appendix 1 for further details.
- The Inclusion of a new Objective under CS9 – CS9 Objective 4
- **CS9 Objective 4:** To facilitate the delivery of new residential development in a coordinated manner, ensuring alignment with investment infrastructure and supporting amenities and services. Such measures shall be delivered through appropriate phasing in line with CS9 SLO1, SLO2, SLO3 and SLO4.
- **CS9 SLO1:** To facilitate the delivery of Phase 1 residential lands at Burgage North in tandem with the delivery of 2 new street connections to main street and the provision of a new local park c. 0.3ha.
- **CS9 SLO2:** To facilitate the delivery of Phase 1 residential lands at Burgage North to the north of St. Finian's Community Centre which reserve suitable lands to facilitate the extension of the existing community centre.
- **CS9 SLO3:** A sequentially phased programme to be submitted alongside any planning application on the subject lands which provides for the delivery of the following in tandem with development or as described 1) No more than 200 units to be permitted before the commencement of the remaining lands of c. 1.4ha to provide for the full Taobh Chnoic Park to the south 2) Urban Park/Square c. 1ha in size (Burgage South Park), 3) East-West Link Street, 4) Sean Feirm Park c. 0.2ha in size, 5) a portion of Tower House Park c. 0.1ha. All applications shall demonstrate to the satisfaction of the Planning Authority how they are supporting the delivery of North South Street connections to the Main Street.

With regards delivery of a new primary school at Taobh Chnoic, the timing of this will be subject to educational needs in consultation with the Department of Education. Prior to completion of 200 units confirmation to be provided from the Department of Education on the transfer of lands to provide for the school, subject to their confirmation of need.

- **CS9 SLO4:** To only facilitate the delivery of Phase 2 residential lands once identified infrastructure comprising of the Urban Park/Square c. 1ha in size, the additional 1.4ha for Taobh Chnoic Park and the East/West Link Street required within Phase 1 have been delivered to the satisfaction of the Planning Authority
- Amend Map 7 to overlay a new map-based objective '*To protect and safeguard strategic residential reserve lands for potential future residential growth beyond the lifetime of the plan*' on the underlying RES-N zoning on lands to the south of Newcastle.

- Rezone 1.3ha of lands to RU from RES-N to the west of Newcastle at the junction of Athgoe Road and Hazelhatch Road.

## Saggart

The submission highlights that Table 9 identifies c. 7.1 ha of undeveloped land (including mixed use and brownfield) in the settlement of Saggart with potential for 251 units or 700 additional people.

Having regard to the recent rapid population increase in the settlement of +260.9% between 2006 and 2016 and the extent of land zoned and capacity for same, it is considered that lands not required to meet the settlement housing targets for the plan period should be considered for rezoning to strategic residential reserve.

### Recommendation 4

#### **Recommendation 4 – Residential land zoning (Saggart)**

**Having regard to the recent rapid population increase in Saggart, its allocated housing units for the plan period and the extent of remaining undeveloped and zoned land that could accommodate residential development, the planning authority is required to review the extent of land zoned RES-N and change any surplus land without benefit of planning permission, and which is not required to meet its housing target for the plan period, to strategic residential reserve.**

### **CE Response:**

The issues raised by the OPR are noted in regard to Saggart. Saggart has experienced significant population growth since 2006 to 2016 of 260.9% over this 10-year period. A land capacity analysis was carried out for the settlement of Saggart and identified that there was extant planning permission for c. 44 units on lands to the north of the village, with further residential lands located to the north along Mill Road and a level of infill capacity within the village centre. Table 9 of the Draft Plan set out that the overall land for settlement was c. 7ha however the allocation of housing unit growth only facilitated the development of a further 96 units which took into account the extant planning permission for 44 units and a level of infill development. Since the publication of the Draft Plan lands to the north along Mill Road have been progressed to stage 2 of the SHD process with a level of development and activity on these lands likely over the plan period. Having regard to this issue and the revisions made to lands in Rathcoole it is proposed to increase the housing target for Saggart from 96 units to 165 units.

In line with the provisions of NPO9 the development of these lands shall be subject to a new SLO which shall guide the development of these lands in a manner which fully integrates with the adjoining lands to the south, provides a green lung/park space centrally located on the subject lands, a play space, creche, the integration of strong cycling and pedestrian permeability proposals to be agreed to the satisfaction of the Planning Authority, Noise Mitigation measures along the northern boundary .

Having regard to the above the following sets out the proposals for the settlement of Saggart in order to address the issues raised. This response is supplemented by Appendix 1 to this CE Report and is presented in summary format below:

- Arising from recommendation 1 of the OPR submission Tables 9 and 10 have been amended. Refer to Appendix 1 for further details.
- Saggart is provided with upward revision to the housing target in table 10 from 96 units to 165 units over the 6-year lifetime of the plan i.e.,2022-2028

#### **CE Recommendation:**

##### **Amend the following sections of the Core Strategy.**

- Table 9: Capacity of undeveloped lands within South Dublin and Table 10: Core Strategy Table 2022-2028. Refer to Appendix 1 for further details.
- The Inclusion of a new Specific Local Objective under CS8
- **CS8 SLO1:** To facilitate the delivery of Phase 1 residential lands at Mill Road Saggart which fully integrates with the adjoining lands to the south and in tandem with the delivery of a park space centrally located on the subject lands, a play space, creche, the integration of strong cycling and pedestrian permeability proposals agreed to the satisfaction of the Planning Authority and the provision of appropriate noise mitigation measures along the northern boundary.

#### **Approach to Zoning**

The planning authority is commended for preparing an infrastructural assessment report as part of Appendix 2 (Part 1) – Developing the Core Strategy.

The Office welcomes the comprehensive nature of the four-step approach which includes land capacity analysis, infrastructure assessment, planning assessment and assessment of delivery. This approach provides a robust evidence-base to inform the Core Strategy in the draft Plan and is generally consistent with NPO 72a, 72b and 72c and the methodology set out in Appendix 3 of the NPF.

#### **CE Response:**

The issue raised is noted and welcomed.

#### **CE Recommendation:**

No Change to Plan

#### **Compact Growth and Regeneration**

The Office welcomes the overall approach in the Core Strategy which seeks to maximise the potential for compact growth consistent with national and regional policies.

The office acknowledges that almost half of the projected growth has been allocated to strategic development areas identified within the MASP with 94% of the housing unit growth targeted for within the Dublin City and Suburbs boundary.

In respect of density, the Office welcomes the inclusion of CS6 Objective 4 which promotes higher densities of 50+ units per hectare subject to meeting qualitative standards at appropriate locations.

#### **CE Response:**

The issue raised is noted and welcomed.

**CE Recommendation:**

No Change to Plan

**Cooldrinagh Lands**

The Office notes that the planning authority has included a specific local objective to provide for a cluster of low-density houses on Cooldrinagh Lane east of the Weston Airport (CSO 11 SLO 1). This land is located in the open break between Lucan and Leixlip and is currently zoned objective RU – *‘To protect and improve rural amenity and to provide for the development of agriculture’*, and is proposed for rezoning to objective RES – *‘To protect and / or improve residential amenity’*.

The office sets out that no clear justification for the proposed rezoning and objective is evident, and the Office is of the view that development at this location is not consistent with the principles of compact growth or sequential approach to development and would erode the existing break between Lucan and Leixlip in an area that is under considerable development pressure.

**Recommendation 5**

**Recommendation 5 - Land rezoning Cooldrinagh Lane and Specific Local Objective CS11 SLO1**

**Having regard to the National Policy Objective 3b supporting compact growth and Regional Policy Objectives RPOs 5.2, 5.3 and 5.4 for the Dublin Metropolitan Area, the conclusion from the land capacity analysis that there is no requirement to zone additional land for housing, and the location of the land on Cooldrinagh Lane in the open break between Lucan and Leixlip, the planning authority is required to retain the current zoning objective RU – ‘To protect and improve rural amenity and to provide for the development of agriculture’ and omit Specific Local Objective (SLO) CS11 SLO1 from the Draft Plan. The proposed rezoning is also inconsistent with policy CS11 which seeks to restrict the spread of dwellings in the Rural RU zone.**

**CE Response:**

The issues raised by the OPR are noted having regard to National Policy Objective 3b supporting compact growth and Regional Policy Objectives RPOs 5.2, 5.3 and 5.4 for the Dublin Metropolitan Area. Having regard to such provisions and the conclusion from the land capacity analysis which identified that there is no requirement to zone additional land for housing, alongside the fact that the inclusion of the SLO would result in and promote urban sprawl of the Dublin City and Suburbs boundary and be contrary to the rural housing guidelines which seek to prevent urban generated housing in rural areas it is considered that the SLO should be removed.

**CE Recommendation:**

Rezone the lands from RES to RU and remove Specific Local Objective CS11 SLO1 relating to lands at Cooldrinagh Lane

### Strategic regeneration areas

The draft Plan identifies two strategic regeneration areas at Tallaght and the Naas Road consistent with the strategic development areas and corridors in the MASP set out table 5.1 of the RSES.

The Core Strategy sets out more specific policy (CS2) and objectives (CS2 Objectives 1 and 2) for the Naas Road / Ballymount lands.

While the inclusion of policy CS2 and related objectives is welcome, it is considered that there could be a stronger commitment to the preparation of a development framework and LAP or similar which refers to same as a strategic priority and includes a time commitment for their preparation.

#### Observation 4

##### Observation 4 – Naas Road / Ballymount

**Given the strategic importance attributed to the regeneration of the Naas Road area in the Metropolitan Area Strategic Plan in the Regional Spatial and Economic Strategy, the planning authority is requested to refine policy CS2 and objective CS2 Objective 1 to make a stronger commitment, including timelines, to the preparation of a development framework and LAP or similar, and to co-ordinate with Dublin City Council in this process.**

#### CE Response:

CS2 Objective 1 seeks ‘*To prepare a Local Area Plan or other appropriate mechanism for the zoned Regeneration (REGEN) lands at Naas Road/Ballymount to include the Local Centre zoning (LC) at Walkinstown. The LAP or equivalent will provide a framework for the sequential and phased development of the lands, integrating sustainable transport, land use and blue and green infrastructure. The spatial planning of the area will be informed by the Naas Road Framework until such time as a Statutory Plan is in place.*

Such provisions have been set out in response to National Policy, with this project ‘City Edge’ seeing Dublin City and South Dublin County Council working together to plan for a sustainable and resilient future for the Naas Road/Ballymount area, the people who live and work there, but also setting out how this area could play an important role in supporting a sustainable future for Dublin.

The preparation of the plan is supported under Policy CS2 of the Draft Plan. CS2 Objective 2 is of particular note with the plan seeking ‘to facilitate a co-ordinated approach and vision to any future sustainable development of the Naas Road Framework area in consultation with Dublin City Council, and all relevant stakeholders including the local community, and ensure that the needs of the existing and new community will be met, and the provision of necessary community and physical infrastructure is delivered in tandem with any new development’.

The City Edge project is progressing and has gone through a first phase of non-statutory public consultation. The Framework Plan will inform a statutory plan which will commence in 2022 and will be subject to further consultation. The framework plan will be developed in a manner which provides for a co-ordinated approach and vision to any future sustainable development of the area with a focus on key nodes as catalysts for the further development of the overall regeneration lands.

While the existing Policy and objective is considered to be sufficient it is considered that the commencement date of the LAP or statutory plan can be inserted into CS2 Objective 1 and the title of policy CS2 should be amended to read City Edge (Naas Road/Ballymount Lands) and references within objectives to the Naas Road/Ballymount Lands should also include reference to City Edge.

### **CE Recommendation:**

Amend Policy and Objectives relating to the Naas Road/Ballymount Regeneration Lands to read as follows:

#### **Policy CS2: City Edge (Naas Road/Ballymount) Regeneration Lands**

Deliver a development framework for the regeneration of the Naas Road lands in conjunction with Dublin City Council which underpins the strategic aims of the National Planning Framework and Regional Spatial and Economic Strategy.

**CS2 Objective 1:** To prepare a Local Area Plan or other appropriate mechanism for the zoned Regeneration (REGEN) lands at **City Edge (Naas Road/Ballymount)** to include the Local Centre zoning (LC) at Walkinstown. The LAP or equivalent will **commence in 2022 and** provide a framework for the sequential and phased development of the lands, integrating sustainable transport, land use and blue and green infrastructure. The spatial planning of the area will be informed by the City Edge (Naas Road) Framework until such time as a Statutory Plan is in place.

CS2 Objective 2: To facilitate a co-ordinated approach and vision to any future sustainable development of the **City Edge (Naas Road Framework)** area in consultation with Dublin City Council, and all relevant stakeholders including the local community, and ensure that the needs of the existing and new community will be met, and the provision of necessary community and physical infrastructure is delivered in tandem with any new development.

### **Standards and Guidelines**

- The Office welcomes the ‘Plan Approach’ for the delivery of sustainable neighbourhoods which is based on ensuring that all development on zoned land is designed and developed around eight key principles. It is noted that applications for new development will be required to be accompanied by a statement detailing how the ‘Plan Approach’ has been taken into consideration and incorporated into the design of the development.
- The Office also commends the planning authority for the preparation of the Building Height and Density Guide which is contained in Appendix 10 of the draft Plan. It is of note that the document contains a contextual analysis toolkit and a height strategy and urban design response for a range of indicative development scenarios. This is complemented by the policies, objectives and guidance provided at section 5.2.7 of the draft Plan.
- While the intent of the guide to provide a detailed set of performance-based criteria for the assessment of developments of greater density and height is welcome, the Office considers that there is scope to set out more specific and tailored practical guidance and policy direction for various locations across the county. The office

make reference to the Building Height Strategy prepared as part of the Draft Limerick Development Plan may provide some guidance to assist responding to this observation (Observation 5).

### Observation 5

#### **Observation 5 – Building Height and Density Guide**

**The planning authority is requested to consider revisions to the Building Height and Density Guide to include more specific and tailored practical guidance and policy direction for various locations across the county which could be provided at neighbourhood level for each of the seven neighbourhoods in Chapter 12 of the draft Plan.**

#### **CE Response:**

The welcoming of the Building Height and Design Guide is noted as is the issue raised.

Observation 5 requests the consideration of revisions to the South Dublin County's Building Height and Density Guide (BHDG) (Appendix 10) to include more specific and tailored practical guidance and policy direction for various locations across the county which could be provided at neighbourhood level for each of the seven neighbourhoods in Chapter 12 of the Draft Plan. It is also noted that reference is made to the Draft Limerick Building Height Strategy (Limerick City BHS) prepared as part of the Draft Limerick Development Plan as a source of guidance to assist in responding to this Observation.

With specific reference to the Draft Limerick Building Height Strategy it is noted that this strategy forms part of the first consolidated plan for Limerick City and County and will replace the existing Limerick City Development Plan 2010-2016 (as extended) and Limerick County Development Plan 2010-2016 (as extended). However, on review of the Draft Limerick BHS (Volume 6, Accompanying Strategies), it is noted that this strategy is entitled 'Building Height Strategy for Limerick City' and the scope is limited to the city centre area of Limerick and the immediately contiguous urban area i.e., a single urban centre. In contrast, the scope of the South Dublin County's BHDG is much wider covering multiple potential development scenarios in both an urban and suburban context, large and small scale, including District Centre (Large Opportunity Site), Village Centre, Town Centre, Suburban Infill (Medium), Suburban Infill (Small), Local Centre, District Centre (Dublin City and Suburbs).

The seven (7) neighbourhoods identified in Chapter 12 of the SDCC Draft Plan are not co-terminous with the scale of the six (6) 'Distinct Areas' as identified by the Limerick City BHS which includes Inner City Core, Rest of Inner-City Area, Surrounding Suburban Area, Southern Environs, Thomond Park Gateway, Castletroy/University Gateway. Specific local height guidance is provided by the Limerick City BHS in response to identified characteristics of the local setting. In contrast, the SDCC Draft Plan identifies seven geographical Neighbourhood Areas where key services and facilities were found to be common to particular towns/villages and urban centres within the County. The seven neighbourhoods identified in the SDCC Draft Plan are in the main comprised of a variety of conditions without a single, distinct character or setting. Therefore, local guidance responding to the Town Centre in the Tallaght neighbourhood would be of limited use for a site in Kilnamanagh; similarly, tailoring local guidance to a Rathcoole setting would be of limited use for sites in Citywest or Newcastle; etc.



Notwithstanding this, it is noted that common to both the Limerick and SDCC approaches is the importance of identifying appropriate assessment criteria for the consideration of heights; the key difference being the locational specificity of some of these parameters in the Limerick example.

Providing more specific area guidance would essentially identify elements of the local setting to which heights must respond: this is in effect what the toolkit Section 4.3.2. directs the applicant to provide. In developing the BHDG, it was considered a more consistent approach given the scale of the administrative area and the variety of component areas of differing local characteristics within the individual neighbourhoods to treat all applications on a site-by-site basis and have applicants undertake the contextual analysis of setting. It is considered that this is the most appropriate format for South Dublin.

#### CE Recommendation:

No Change to Plan

### Chapter 13 Implementation and Monitoring:

The office sets out that while the standards are generally consistent with the performance-based standards as per NPO13, there are some prescriptive standards which could militate against the principle of promoting appropriate density and compact growth including:

- A separation distance of 22 metres should generally be provided between directly opposing above ground floor windows to maintain privacy.
- A minimum clearance distance of circa 22 metres, in general, is required, between opposing windows in the case of apartments up to three storeys in height.
- Backland development - development that is in close proximity to adjoining residential properties should be limited to a single storey.

#### Observation 6

##### Observation 6 – Development Management Standards

**The planning authority is requested to remove the requirement for 22 metres between opposing floor windows and limitation on building height for backland development and instead focus on assessing individual development proposals on performance-based criteria dependent on location and individual site characteristics in accordance with the provisions of NPO 13.**

#### CE Response:

The content of Observation 6 in regard to development management standards and the request to remove the requirement for 22 metres between opposing floor windows and limitation on building height for backland development and instead focus on assessing individual development proposals on performance-based criteria dependent on location and individual site characteristics in accordance with the provisions of NPO 13 is noted.

NPO 13 as set out in the National Planning Framework (NPF) states: *In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.*

In this regard section 13.5.4 Residential Standards is noted where under the subheading ‘Separation Distances and Block Layout’ the following references are made:

Section 10 of the Urban Design Manual (2009) addresses privacy and amenity. A separation distance of 22 metres should generally be provided between directly opposing above ground floor windows to maintain privacy. Reduced distances will be considered in respect of higher density schemes or compact infill sites where innovative design solutions are used to maintain a high standard of privacy.

- A minimum clearance distance of circa 22 metres, in general, is required, between opposing windows in the case of apartments up to three storeys in height. In taller blocks, a greater separation distance may be prescribed having regard to the layout, size, and design.
- In certain instances, depending on orientation and location in built-up areas, reduced separation distances may be acceptable.
- In all instances where the minimum separation distances are not met, the applicant shall submit a daylight availability analysis for the proposed development.

It is noted that Urban Design Manual (2009) in addressing privacy and amenity sets out that rather than establishing a minimum window-to-window standard, the aim should be to assess the impact on privacy of each layout and home design based on:

- The site’s location and residents’ expected levels of privacy
- The size of the windows – both those overlooking and overlooked
- Changes in level between overlooking windows
- Ability to screen/partially obscure views through design

While this is noted it is not considered that the criteria set out is strictly at variance with NPO13 as the wording indicates that a minimum clearance distance of circa 22 metres, **in general**, [emphasis added] is required, between opposing windows in the case of apartments up to three storeys in height. Furthermore, the subsequent provisions facilitate reduced distances. While it is not considered that these provisions are overly onerous and merely set a benchmark from which a proposal can be developed from, it is considered that the wording of this section in the interests of clarity could be amended to read as follows:

Section 10 of the Urban Design Manual (2009) addresses privacy and amenity and sets out that rather than establishing a minimum window-to-window standard, the aim should be to assess the impact on privacy of each layout and home design based on:

- The site’s location and residents’ expected levels of privacy

- The size of the windows – both those overlooking and overlooked
- Changes in level between overlooking windows
- Ability to screen/partially obscure views through design

In this regard and as benchmark for development, a minimum clearance distance of circa 22 metres, **in general**, is required between opposing windows, including in the case of apartments up to three storeys in height. In taller blocks, a greater separation distance may be prescribed having regard to the layout, size, and design.

Reduced distances will be considered in respect of higher density schemes or compact infill sites where innovative design solutions are used to maintain a high standard of privacy in line with the provisions of the Urban Design Manual as detailed above.

In all instances where the benchmark separation distance is not being met, the applicant shall submit a daylight availability analysis for the proposed development and detail appropriate design measures to reduce undue overlooking.

In regard to the issue of backland development the Draft Plan sets out the following:

### **Backland Development**

The design of development on backland sites should meet the criteria for infill development in addition to the following criteria:

- Be guided by a site analysis process in regard to the scale, siting and layout of development.
- Avoid piecemeal development that adversely impacts on the character of the area and the established pattern of development in the area.
- Development that is in close proximity to adjoining residential properties should be limited to a single storey, to reduce overshadowing and overlooking.
- Access for pedestrians and vehicles should be clearly legible and, where appropriate, promote mid-block connectivity.

In this regard it is acknowledged that there may be instances where a backland development proposal through specific site characteristics and an innovative design may accommodate a development greater than 1 storey. In this regard it is considered that the criteria set out should be amended as follows.

### **Amend bullet point 3 as follows:**

Demonstrate that there is no undue overlooking that overshadowing is assessed having regard to ‘*Site Layout Planning for Daylight and Sunlight*’ (2nd edition): *A Guidelines to Good Practice (BRE 2011)* and *BS 8206-2: 2008 – ‘Lighting for Buildings – Part 2: Code of Practice for Daylighting’* and/or any updated guidance

### **CE Recommendation**

In Section 13.5.4 under the heading Separation Distances and Block Layout amend the text to read as follows:

From:

Section 10 of the Urban Design Manual (2009) addresses privacy and amenity. A separation distance of 22 metres should generally be provided between directly opposing above ground floor windows to maintain privacy. Reduced distances will be considered in respect of higher density schemes or compact infill sites where innovative design solutions are used to maintain a high standard of privacy. A minimum clearance distance of circa 22 metres, in general, is required, between opposing windows in the case of apartments up to three storeys in height. In taller blocks, a greater separation distance may be prescribed having regard to the layout, size, and design.

- In certain instances, depending on orientation and location in built-up areas, reduced separation distances may be acceptable.
- In all instances where the minimum separation distances are not met, the applicant shall submit a daylight availability analysis for the proposed development.

To:

Section 10 of the Urban Design Manual (2009) addresses privacy and amenity and sets out that rather than establishing a minimum window-to-window standard, the aim should be to assess the impact on privacy of each layout and home design based on:

- The site's location and residents' expected levels of privacy
- The size of the windows – both those overlooking and overlooked
- Changes in level between overlooking windows
- Ability to screen/partially obscure views through design

In this regard and as benchmark for development, a minimum clearance distance of circa 22 metres, **in general**, is required between opposing windows, including in the case of apartments up to three storeys in height. In taller blocks, a greater separation distance may be prescribed having regard to the layout, size, and design.

Reduced distances will be considered in respect of higher density schemes or compact infill sites where innovative design solutions are used to maintain a high standard of privacy in line with the provisions of the Urban Design Manual as detailed above.

In all instances where the benchmark separation distance is not being met, the applicant shall submit a daylight availability analysis for the proposed development and detail appropriate design measures to reduce undue overlooking.

Under section 13.5.8 Residential Consolidation Sub heading Backland Development

Amend bullet point 3 as follows:

### **Backland Development**

The design of development on backland sites should meet the criteria for infill development in addition to the following criteria:

- Be guided by a site analysis process in regard to the scale, siting and layout of development.
- Avoid piecemeal development that adversely impacts on the character of the area and the established pattern of development in the area.

- Demonstrate that there is no undue overlooking, and that overshadowing is assessed having regard to ‘*Site Layout Planning for Daylight and Sunlight*’ (2nd edition): *A Guidelines to Good Practice* (BRE 2011) and *BS 8206-2: 2008 – ‘Lighting for Buildings – Part 2: Code of Practice for Daylighting’* and/or any updated guidance
- Access for pedestrians and vehicles should be clearly legible and, where appropriate, promote mid-block connectivity.

## Housing Policies

### Part V Housing

The office highlights *Housing Circular 28/2021* and the commencement with effect from 3 September 2021 of Part 6 of the *Affordable Housing Act 2021*, which amends Part V of the *Planning and Development Act 2000*.

The principal change to Part V effected by these amendments is to increase the Part V contribution for new housing developments from up to 10% for social housing to a mandatory 20% requirement, at least half of which must be applied to social housing provision and up to half of which may be applied to affordable and cost rental housing.

The exempted development size in section 97 has been reduced from less than 10 units to less than 5 units (essentially reversing the 2015 amendment). The immediate impact of commencing these provisions will relate to applications for certificates of exemption as developments of between 5 and 9 units will no longer be eligible for a certificate of exemption from 3 September 2021 on.

Given the above the office require the planning authority to amend objective H1 Objective 2 and review the housing policies and objectives in the draft Plan to ensure they are consistent with Part 6 of the *Affordable Housing Act 2021* and amendments to Part V of the *Planning and Development Act 2000*.

### Recommendation 6

#### **Recommendation 6 – Social and Affordable Housing**

**Having regard to Part 6 of the *Affordable Housing Act 2021* and consequential amendments to Part V of the *Planning and Development Act 2000* and *Housing Circular 28/2021*, the planning authority is required to amend H1 Objective 2 in respect of the percentage requirement and number of units to be reserved for social and affordable housing, and to review the policies and objectives in the *Draft South Dublin County Development Plan 2022 – 2028* to be consistent with the changes brought in under the aforementioned legislation.**

#### CE Response:

The Recommendation 6 is noted and considered appropriate.

#### CE Recommendation:

Amend H1 Objective 2 from:

To require that 25% of lands zoned for residential use, or for a mixture of residential and other uses for development of 9 or more units or development of units on land greater than 0.1 hectares (or relevant figures as may be revised by legislation) be reserved for social and affordable housing in accordance with the Urban Regeneration and Housing Act 2015 and the Planning and Development Act 2000 (as amended).

To: H1 Objective 2:

To require that ~~25%~~ **20%** of lands zoned for residential use, or for a mixture of residential and other uses for development of ~~9~~ **5** or more units or development of units on land greater than 0.1 hectares (or relevant figures as may be revised by legislation) be reserved for social and affordable housing in accordance with the ~~Urban Regeneration and Housing Act 2015~~ **Affordable Housing Act 2021** and the Planning and Development Act 2000 (as amended).

## Housing Mix

The office makes specific reference to Housing Mix and Specific Planning Policy Requirement (SPPR) 1 of the *Sustainable Urban Housing: Design Standards for New Apartments (2020)* which states:

*'Housing developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s).'* (Emphasis added)

The Office acknowledge that the housing strategy and interim HNDA examine this issue on an evidence basis, however it is considered that further refinement of H1 Objective 13 is required.

## Recommendation 7

### Recommendation 7 – Minimum requirements for 3-bedroom units

Having regard to the Specific Planning Policy Requirement (SPPR) 1 in the section 28 of the *Sustainable Urban Housing: Design Standards for New Apartments (2020)* the planning authority is required to amend, remove or provide further justification for objective H1 Objective 13 in respect of:

- (i) the basis for 30% as the relevant requirement, and
- (ii) the application of the requirement across the entire county (as opposed to identifying particular areas or neighbourhoods).

CE Response:

Amend H1 Objective 13 as follows:

From:

Proposals for residential development shall provide a minimum of 30% 3-bedroom units unless it can be demonstrated that:

- there are unique site constraints that would prevent such provision or
- that the proposed housing mix meets the specific demand required in an area, having regard to the prevailing housing type within a 10-minute walk of the site and to the socio-economic, population and housing data set out in the Housing Strategy and Interim HNDA.

To:

***Proposals for residential development shall provide a minimum of 30% 3-bedroom units, a lesser provision may be acceptable where it can be demonstrated that:***

- *there are unique site constraints that would prevent such provision or*
- *that the proposed housing mix meets the specific demand required in an area, having regard to the prevailing housing type within a 10-minute walk of the site and to the socio-economic, population and housing data set out in the Housing Strategy and Interim HNDA.” (emphasis added)*
- ***the scheme is a social and/or affordable housing scheme***

### Local Authority lands

The Office note objective H1 Objective 19 regarding local authority lands zoned for Res/Res N or future zoned Res/ResN. The Office acknowledges the intent of the objective that such land is used for the delivery of social, affordable cost rental and affordable purchase homes. However, it is considered that the blanket nature of the objective may limit the flexibility of the planning authority to provide for diverse neighbourhoods consistent with both NPO 4 and H2 Objective 6 of the draft Plan.

### Observation 7

#### Observation 7 – Housing objective H1 Objective 19

**Having regard to National Policy Objective 4 which supports the creation of ‘*diverse and integrated communities*’ and objective H2 Objective 6 of the draft Plan which seeks to ‘... *avoid additional concentration of social housing above that already in existence*’, the planning authority is advised to review objective H1 Objective 19 to provide sufficient safeguards and flexibility in relation to local authority lands zoned Res/Res N.**

### CE Response

Observation 7 advises that the planning authority to review objective H1 Objective 19 to provide sufficient safeguards and flexibility in relation to local authority lands zoned Res/Res N, having regard to National Policy Objective 4 which supports the creation of ‘*diverse and integrated communities*’ and objective H2 Objective 6 of the draft Plan which seeks to ‘... *avoid additional concentration of social housing above that already in existence*’.

H1 Objective 19 of the Draft Plan states:

H1 Objective 19:

*To ensure that where Local Authority public lands zoned Res/Res N or future zoned Res/Res N local authority lands are used to develop housing, that it is used exclusively for the delivery of social, affordable cost rental and affordable purchase homes.*

It should be noted that H1 Objective 19 is included in the Draft Plan on foot of Motions agreed during the Council meetings in June 2021 by the elected members. While the observations of the OPR are noted it is the view of the Council that the wording as set out, proposed through the pre-draft motion process and voted for by the members should remain as currently worded.

## **CE Recommendation**

No Change to Draft Plan

### **Residential development of land zoned for open space**

The Office note objective H3 Objective 4 supports community led housing for older people and social and affordable housing on land zoned for open space (OS).

The Office considers, however, that H3 Objective 4 which supports community / social / affordable housing on lands zoned for open space could prejudice the delivery of the primary purpose of the zoning objective OS which is *‘To preserve and provide for open space and recreational amenities’*.

#### **Observation 8**

##### **Observation 8 – Housing objective H3 Objective 4**

**Having regard to sections 10(2)(j) and (3) of the *Planning and Development Act 2000*, (as amended) the Office considers that the land use zoning objective as provided for within the draft Plan *‘To preserve and provide for open space and recreational amenities’*, has the potential to be undermined and diluted by the inclusion of objective H3 Objective 4 which supports community / social / affordable housing on lands zoned for open space.**

**The planning authority is requested to provide justification for the inclusion of objective H3 Objective 4 which supports community / social / affordable housing on lands zoned for open space, or to amend or remove the objective in order to protect the primary purpose of the zoning objective.**

#### **CE Response**

Observation 8 request that the planning authority provide a justification for the inclusion of objective H3 Objective 4 which supports community / social / affordable housing on lands zoned for open space, or to amend or remove the objective in order to protect the primary purpose of the zoning objective.

H3 Objective 4 in the Draft Plan states:



*To support community led housing developments for older people and social and Council affordable housing in established areas on lands designated with Zoning Objective “OS” (To preserve and provide for open space and recreational amenities), only where the quality and quantum of remaining public open spaces is deemed to be adequate and the amenities of the area are preserved.*

It is noted that in South Dublin there has been a legacy of older Council estates in particular, where large areas of public open space were provided. However, in some instances these open spaces are not functioning as they should and would not meet standards of multi-functionality and security, including passive surveillance, that would be best practice today. In light of this, and in the interests of compact growth and better layout and design, there are times when open space is more efficiently used for housing.

H3 Objective 4 stipulates that **“only where the quality and quantum of remaining public open spaces is deemed to be adequate, and the amenities of the area are preserved”** [EMPHASIS ADDED] will housing developments for older people and social and Council affordable housing in established areas on lands designated with Zoning Objective “OS” be supported.

In addition to the above it should be noted that the Draft Plan supports a hierarchy of multi-functional, accessible parks and public open spaces across the County in line with Table 8.1, based on existing populations and planned growth in accordance with the overall standard of 2.4ha per 1,000 population. COS5 Objective 1 refers to such provisions.

In addition, as per Section 8.7.1 of the Draft Plan and the ‘Principles Guiding Public Open Space Provision’, the Parks and Open Space Strategy 2021 – which is currently in development – will provide the basis for the upgrade, provision, management and maintenance of publicly managed parks and open spaces, complementing the Draft Plan policies and objectives relating to Parks and Public Open Space (Section 8.7) and the Green Infrastructure Strategy (Chapter 4).

Having regard to the above it is not considered necessary to amend the objective as set out in the Draft Plan. However, it is considered that the zoning matrix should include a footnote after ‘Housing for Older People’ and ‘Residential’ where these are open for consideration to state:

‘Only where this accords with H3 Objective 4’

### **CE Recommendation**

Amend Open Space zoning matrix to include a footnote after ‘Housing for Older People’ and ‘Residential’ where these are open for consideration to state:

‘Only where this accords with H3 Objective 4’

### **Traveller Accommodation**

The Office notes Policy H4 regarding the implementation of the *South Dublin County Council Traveller Accommodation Programme 2019 – 2024* and the supporting objectives e.g. H1 Objective 10 which are set out in Chapter 6 of the draft Plan. In this regard, the planning authority is commended for including indicative sites for Traveller accommodation on the land use zoning maps.

### **CE Response:**

The comments of the OPR are noted and welcomed

### **CE Recommendation:**

No Change to Plan

## **Rural Housing**

In respect of rural housing, the Office notes that the entire rural area of South Dublin is under strong urban influence and it is the policy of the council to restrict the spread of urban generated dwellings into rural and high amenity areas. The Office has reviewed the rural housing policies and objectives in the draft Plan and concludes that no recommendations or observations are required at this time.

### **CE Response:**

The comments of the OPR are noted and welcomed

### **CE Recommendation:**

No Change to Plan

## **Economic Development and Employment**

### **Employment Zoned Land**

The Office welcomes the evidence-based approach that has informed the employment strategy in the draft Plan and considered the existing land zoned for employment and the requirement for additional employment lands based on population and employment growth assumptions.

The Office consider that policy CS5 and objectives (CS5 Objective 1 – 4) for employment land and objectives EDE1 (Objectives 2, 4 and 5) reflect the RSES guiding principles for the Dublin Metropolitan Area and employment land and are consistent with RPO 4.3 in particular.

### **Policies for Economic Development**

The Office commends the planning authority for the comprehensive nature of the policy direction for economic development in particular the focus on climate action (EDE2 Objectives 1 – 4) and clarity provided for different employment types such as people intensive enterprise and employment (EDE4 Objective 4), hi-tech manufacturing, R&D (EDE5 Objective 1) and requirements for space extensive enterprises (EDE7 Objective 2).

### **Retail**

The Office considers that the policies and objectives for retail development in Chapter 9 are generally consistent with the RPGs and the Regional Retail Hierarchy contained in the RSES.

### **Rural Economy**

The Office notes that the Draft Plan acknowledges the importance of the existing extractive resources and minerals in the county in section 9.10, however it does not identify or map the location of major deposits as advised by the section

28 *Quarries and Ancillary Activities Guidelines for Planning Authorities* (DEHLG, 2004) and the guidelines are not referenced in the plan.

### Observation 9

#### Observation 9 – Extractive Industry

**Having regard to National Policy Objective 23 and the section 28 *Quarries and Ancillary Activities Guidelines for Planning Authorities* (2004), the planning authority is requested to include a map to show the location of quarries and minerals across the functional area of your authority.**

#### **CE Response:**

The Council recognises under National Policy Objective 23 and the section 28 *Quarries and Ancillary Activities Guidelines for Planning Authorities* (2004), the planning authority should include a map to show the location of quarries and minerals across the functional area of the County.

Noting also the recommendation on this issue from the OPR, it is considered appropriate to include a map highlighting these assets within the Draft Plan. It is also considered that corresponding text should be inserted into section 9.10 *Quarries and Mineral Extraction* to indicate that the Development Plan maps include the locations of registered quarries under the Planning and Development Acts.

#### **CE Recommendation:**

1. Amend the draft plan maps to show the location of registered quarries within the County
2. Insert text into section 9.10 *Quarries and Mineral Extraction* as follows:

The location of registered quarries under the Planning and Development Acts is indicated on the Development Plan maps. The mapping of a quarry location does not indicate its current planning status.

### **Sustainable Transport and Accessibility**

The Office welcomes the ambition of the planning authority to promote more sustainable travel in the county over the plan period and the policies and objectives supporting same.

Overall, the Office considers that the draft Plan has the potential for positive impacts in terms of energy reduction and greenhouse gas (GHG) emissions reductions as required by section 10(2)(n) of *the Act*, for new development.

The only matter which the Office considers it necessary to raise relates to the inclusion, at Table 7.5 (Six Year Road Programme), of the *Western Dublin Orbital Route*, which is a major road proposal connecting the N81 and N4 (at Leixlip).

Having regard to the ongoing review of the *Transport Strategy for the Greater Dublin Area*, the scale of the proposed road project and the policies and objectives supporting a significant reduction in car use over the plan period, it is considered that the inclusion of the Western Dublin Orbital Route in Table 7.5, and its role in terms of future public

transport provision, need to be carefully considered within the context of the forthcoming update of the Transport Strategy for the Greater Dublin Area.

#### Observation 10

##### **Observation 10 – Western Dublin Orbital Route**

**Having regard to section 10(2)(n) of the *Planning and Development Act 2000*, (as amended), the policies and objectives in the draft Plan promoting more sustainable travel and a significant reduction in the mode share for private car use over the plan period, and the ongoing review of the *Transport Strategy for the Greater Dublin Area*, the planning authority is requested to clarify the function of any western orbital route, provide adequate protection from inappropriate forms of development which may compromise these functions, and make provision for sustainable transport along its length. Any future proposal must also be justified on the basis of, and consistent with, the forthcoming updated *Transport Strategy for the Greater Dublin Area*.**

#### **CE Response:**

The issues raised by the OPR are noted. It should also be noted that the National Transport Authority under submission 245 welcome the role of the Transport Strategy in determining any future requirement there may be for the Western Orbital Route the function of which would be to provide resilience to the M50 in particular between the N7 and N4 which would include provision for sustainable transport modes along its length. It is further stated that any such route would require protection from inappropriate forms of development which may compromise this function and that an extension of this route from the N7 to the N81 would have to be demonstrated against the Transport Strategy's objectives.

The NTA submission recommends that the wording for the Western Dublin Orbital Route in table 7.5 be amended to include reference to its primary function in the provision of resilience to the operation of the M50, and that justification for any further extension from the N7 to the N81 would be required against the Transport Strategy's objectives.

In this regard section 7.7.2 'New Streets and Road Proposals sets out details in regard to the strategic road network. Within this section Table 7.5 outlines a Six Year Road Programme, which is subject to available funding. The Western Orbital Route is identified as having the following function:

*New road from N81 to the Link between the N81, N7 and the N4 with a route Leixlip Interchange by-pass function around Rathcoole and Saggart. The need for this route, further connections and possible alternative routes will be determined through the review of the NTA's GDA Strategy and in consultation with TII and relevant local authorities. In any such route a primary objective of South Dublin County Council shall be to protect the scenic Liffey Valley parklands, and amenities at Lucan Demesne and St Catherine's Park and Lucan Village and no proposals to continue a road over these lands will be considered.*

The points raised by the NTA in their submission are noted in regard to the function of this route between the N7 and N4 being to provide resilience to the M50 and the requirements for this route to be protected from inappropriate development which may compromise this function.

It is further noted that the extension of this route from the N7 to the N81 would need to be demonstrated against the Transport Strategies objectives.

In this regard it is considered reasonable to amend the wording in Table 7.5 in order to make reference to the proposed route and its function between the N7 and N4 and furthermore to include wording in regard to the required justification for any extension to this route from the N7 and N81 in line with the Transport Strategy Objectives.

#### **CE Recommendation:**

Amend Table 7.5 and the Description and function of the Western Orbital Route as follows:

From:

Description: *New Road from N81 to the Leixlip Interchange*

Function: *New Road from N81 to the Link between the N81, N7 and the N4 with a route Leixlip Interchange by-pass function around Rathcoole and Saggart. The need for this route, further connections and possible alternative routes will be determined through the review of the NTA's GDA Strategy and in consultation with TII and relevant local authorities. In any such route a primary objective of South Dublin County Council shall be to protect the scenic Liffey Valley parklands, and amenities at Lucan Demesne and St Catherine's Park and Lucan Village and no proposals to continue a road over these lands will be considered.*

To:

Description-*New Road from the N7 to the N4 with a potential extension to the N81*

Function:

*New Road to link between the N7 and the N4 Leixlip Interchange with a route by-pass function around Rathcoole and Saggart and the potential for a further extension of this route from the N7 to the N81. The function of this route would be to provide resilience to the M50 in particular between the N7 and N4 and further connections and possible alternative routes will be determined through the review of the NTA's GDA Strategy and in consultation with TII and relevant local authorities.*

*In any such route a primary objective of South Dublin County Council shall be to protect environmentally sensitive areas including the scenic Liffey Valley parklands, and amenities at Lucan Demesne and St Catherine's Park and Lucan Village and no proposals to continue a road over these lands will be considered.*

## **Climate Action and Renewable Energy**

- The Office welcomes the 'layered' format of the draft Plan which integrates climate actions as an overarching theme and aims to facilitate a holistic approach to ensuring climate action is at the forefront of all future development within the County.

In particular, the inclusion of a symbol for 'climate positive' objectives and a climate action audit at the end of each chapter which provides an overview of the potential sources of Greenhouse Gas (GHG) emissions alongside measures implemented to address such potential climate impacts are extremely positive aspects of the draft Plan and the planning authority is commended for this approach.

- The planning authority is also strongly commended for including information on the county-wide emissions inventory for South Dublin (Table 10.1).
- The office further notes that the manner of addressing climate change in statutory development plans is the subject of ongoing policy development. Accordingly, it would be considered prudent to include an objective in the draft Plan to the effect that an assessment will be undertaken in relation to the implications of the introduction of such future policy mechanisms, with a view to varying the draft Plan as made to ensure consistency with relevant climate assessment and development plan guidelines.

#### Observation 11

##### **Observation 11 – Climate Action**

**Given the importance attributed to climate action by Government, as evidenced by, inter alia, the recent *Climate Action and Low Carbon Development Bill* (March, 2021) and the *Climate Action Plan 2019*, the planning authority is advised that the draft Plan should also include an objective to consider a variation of the development plan within a reasonable period of time, or to include such other mechanism, as may be appropriate, to ensure the development plan will be consistent with the approach to climate action recommended in the revised *Development Plan Guidelines* as adopted or any other relevant guidelines.**

#### **CE Response:**

Section 8.1.3 of the Draft Development Plan Guidelines is noted where the role of the Development Plan in Climate Action is detailed. In this regard it is noted that statutory requirements of the development plan in relation to climate action are set out as a mandatory objective in the Planning Act:

Section 10(2)(n) of the Act requires that a development plan shall include objectives for:

the promotion of sustainable settlement and transportation strategies in urban and rural areas including the promotion of measures to —

- (i) reduce energy demand in response to the likelihood of increases in energy and other costs due to long-term decline in non-renewable resources,
- (ii) reduce anthropogenic greenhouse gas emissions and address the necessity of adaptation to climate change, taking account of the local authority climate action plan (within the meaning of section 14B of the Climate Action and Low Carbon Development Act 2015), where such a plan has been made for the area in question; in particular, having regard to location, layout and design of new development;

Furthermore the Draft Guidelines state the development plan provides an opportunity to focus on particular land-use aspects of climate action (and the local authority’s own climate action plan) and how the planning system can be utilised to effect positive change and action. Several components can be identified specifically:

- Compact Growth and Sustainable Mobility
- Importance of Sustainable Transport Measures
- Energy Related Objectives
- The role of Nature-based Solutions
- Flooding and Water Management in Mitigating and Adapting to Climate Change

The provisions of the plan are considered to strongly correlate with the above key components. In this regard the following should be noted:

The Development Plan has been assessed against its impact on the receiving environment through the SEA and AA processes. The plan has also been subject to a strategic flood risk assessment taking account of the most up to date flood risk information available.

The 'layered' format of the Plan aims to facilitate a holistic approach to ensuring Climate Action is at the forefront of all future development within the County, with policies and objectives in each chapter crafted in a manner which contributes significantly towards addressing climate change and reducing the County's carbon emissions in a meaningful and tangible way. These overarching climate action principles align closely with the key action areas of the South Dublin Climate Action Plan 2019-2024; namely Energy and Buildings, Transport, Flood Resilience and Resource Management.

The policies and objectives set out in the Core Strategy and Settlement Strategy, Chapter 2 of this plan, have been framed in a manner to ensure consistency with the provisions of the NPF and RSES as required by Section 10 (2) of the Planning and Development Acts. This provides for a compact approach to growth with the aim of facilitating the delivery of climate resilient and sustainable communities throughout the County.

It is the aim of the plan to achieve an efficient use of land with a focus on key urban centres, and to achieve development densities that can support vibrant, compact, walkable places that prioritise pedestrian and cyclist movement.

The Core Strategy aims to maximise the potential of the County to deliver a compact settlement form in line with National and Regional population targets, where a strong focus has been placed on regeneration and the redevelopment of brownfield over green field lands. Almost half of the County's growth has been allocated to strategic development areas identified within the Metropolitan Area Strategic Plan with an overall total of 94% of the unit growth being located within Dublin City and Suburbs. Such measures facilitate the delivery of a compact and connected settlement form where existing public transport infrastructure can be availed of thus reducing the need for car-based travel, contributing towards a reduction in carbon emissions and contributing positively towards addressing Climate Change within the County.

The focus of the Development Plan on brownfield over greenfield development, supports an ecosystems approach, protects natural areas while also seeking to enhance existing green networks both within the natural and urban environment through the promotion and enhancement of existing pathways and green connections within the County.

The potential for the delivery of energy efficient projects throughout the County is also facilitated through a more compact settlement form reducing costs and carbon emissions and guaranteeing energy resilience for the future of the County.

Creating a safe and climate resilient environment is essential in encouraging active modes of transport. Such environments can be created through a high-quality design and layout of buildings, appropriate mix of uses, densities, height and the sensitive integration of the natural and built environment. Creating a strong sense of place and enabling connections across the County can be enhanced through a robust and resilient Green Infrastructure network employing nature-based solutions and contributing directly to climate action measures through carbon sequestration, water quality improvements and other measures.

At the Neighbourhood level the plan aims to locate people in close proximity to their place of work, services, amenity and leisure facilities thereby reducing the need for car-based travel and cumulatively resulting in significant and measurable reductions in GHG emissions.

Furthermore, and to ensure such provisions have been implemented successfully throughout this plan, specific Climate 'Positive Objectives' have been highlighted with the climate symbol and Climate Action Audit is included at the end of each Chapter providing an overview of the potential sources of greenhouse gas emissions alongside measures implemented to address such potential climate impacts.

It is considered that the above measures address the requirements of Section 10(2)(n) of the Act and the key components identified specifically;

- Compact Growth and Sustainable Mobility
- Importance of Sustainable Transport Measures
- Energy Related Objectives
- The role of Nature-based Solutions
- Flooding and Water Management in Mitigating and Adapting to Climate Change

Furthermore, the provisions of CA1 Objective 3 which seeks '*To implement the South Dublin County Council Climate Change Action Plan 2019 - 2024 (SDCC CCAP) or superseding plans and to facilitate a just transition to a climate resilient low carbon County. (consistent with SO8 of the NPF, RPO 7.32, 7.33 of the RSES)*' provide sufficient scope for a coherent approach to Climate action in accordance with any revised or updated legislation.

Should significant changes to policy or legislation arise they will be reviewed against the Development Plan in the normal way and a variation initiated should it be required. However, this will be kept under review in the same way as any other policy changes which may require a variation and it is considered that an objective in this instance would be out of place when it is not referred to in other areas where there may be change.

#### **CE Recommendation:**

No change to Plan

### **Flood Risk Management**

The Office notes that a Strategic Flood Risk Assessment (SFRA) has been carried out for the development plan and the inclusion of policy objectives recommended by the SFRA have been included within the draft Plan. However the flood risk zones have not been overlaid on the land use zoning map in order to clearly outline what lands are impacted by flood risk and to assess if the sequential approach has been applied.

Furthermore the office notes that a county wide justification test has been applied which is inconsistent with the requirements of the section 28 *The Planning System and Flood Risk Management, Guidelines for Planning Authorities*



(2009) and in this regard, a plan making justification test should be applied to a number of land zonings within the draft Plan in order to fully determine that the sequential approach to flood risk management based on avoidance, reduction and mitigation of flood risk.

### **Recommendation 8**

#### **Recommendation 8 - Flood Risk Management**

**Having regard to the detailed requirements of *The Planning System and Flood Risk Management, Guidelines for Planning Authorities (2009)*, the planning authority is required to update the settlement plan maps to ensure the following:**

- (i) the land use zoning maps are overlaid with the flood maps prepared in the Strategic Flood Risk Assessment in order to clearly outline the sites at risk of flooding;**
- (ii) a Plan-making justification test is carried out and can be satisfied for the specific land use zonings within Flood Risk A and B that include developments classified as highly vulnerable development; and**
- (iii) policy objectives are included for any sites zoned for development following the application of a justification test which requires that the sequential approach be applied to ensure no encroachment onto or loss of the flood plain or that only water compatible development would be permitted for the lands identified as being at risk of flooding.**

#### **CE Response:**

The issues raised are noted. In this regard the Draft Plan has been updated to ensure full compliance with the requirements of *The Planning System and Flood Risk Management, Guidelines for Planning Authorities (2009)*. A plan-making Justification Test has been carried out in accordance with the Guidelines and is included in Appendix 4 of this report. A new development plan map will be created with the flood maps overlaid onto the zoning.

#### **CE Recommendation:**

Include a plan making Justification Test as part of the SFRA as shown in Appendix 4

Provide a new development plan map with the zoning maps overlaid with the flood maps.

## **1. Environment, Heritage and Amenities**

### **Rights of Way**

The Office acknowledges the inclusion of EDE23 Objective 2 which states '*To identify, in a logical and sequenced way, existing public rights of way in relevant areas of the County and to investigate the creation of new public rights of way by taking the following steps within two years of adoption of the Plan...*'

The office make reference to Section 10(2)(o) of the Act however which requires public rights of way to be located on both a map and on a list appended to the development plan. The planning authority's attention is drawn to examples of good practice identified in that Case Study Paper.

## Recommendation 9

### **Recommendation 9 – Public Rights of Way**

**Having regard to the requirements of Section 10(2)(o) of the *Planning and Development Act 2000*, (as amended), the planning authority is required to include written policy together with maps identifying public rights of way.**

### **CE Response**

The acknowledgement by the OPR of EDE23 Objective 2 is welcomed as it sets out the local authority's intent through a stepped approach to the identification of public rights of way. It is pointed out that the identification of **public** rights of way, as required by the Act, is a difficult and resource intensive exercise in the absence of land law or property registry to facilitate. This is recognised in the OPRs case study paper. It is noted that it is not clear in the case study paper that the good practice examples relate to public rights of way. In this regard, the Draft Plan includes separate policy on permissive access routes, recognising that they can be an appropriate mechanism to provide the access sought by the Act under public rights of way.

Notwithstanding, having further reviewed information held within the Council, a public right of way has been identified in Lucan giving access to the Liffey and associated walkway by the weir. This will be mapped on the Green Infrastructure maps of the County Development Plan. Given, that at this time it is the only public right of way identified it is proposed to list it in the Development Plan under section 9.9.1 Public Rights of Way. Once further public rights of way are identified as set out under the objective, a Variation of the Plan, as appropriate can provide for a list to be appended.

### **CE Recommendation**

Include a public right of way on the Green Infrastructure maps of the County Development Plan. The public right of way to be shown in Lucan, from the Main Road running down the slip (Watery Lane) between the old St. Andrew's primary school house to the west and a commercial building to the east leading to the River Liffey walkway as far as the western side of the Liffey bridge to exit at street level on the southern side of the bridge.

To list the public right of way as described above in section 9.9.1 under a new heading to read 'List of mapped Public Rights of Way' as follows:

#### List of Public Rights of Way

Public rights of way listed below are identified on the Green Infrastructure maps.

Lucan Weir - from the Main Road in the Village running down the slip (Watery Lane) between the old St. Andrew's primary school house to the west and a commercial building to the east leading to the River Liffey walkway, as far as the western side of the Liffey bridge to exit at street level on the southern side of the bridge.

### **Architectural Conservation Area**

Chapter 3 and Appendix 3 of the draft Plan addresses the mandatory objectives in relation to protected structures and architectural conservation areas (ACA) for the county and archaeological heritage.

It is noted that Goose Park, Old Bawn Road and TJ Burns Cottages, Old Bawn Road have been included on the list of ACA's and that an assessment is required to provide a description of the architectural character of both. The Office advises that the inclusion of these areas should be exclusively based on the criteria set out in the *Architectural Heritage Protection: Guidelines for Planning Authorities* (DAHG, 2011) and a clear justification to support designating these as ACAs provided.

#### Observation 12

##### **Observation 12- Additions to list of Architectural Conservation Areas**

**Having regard to the built form, architectural design and location of the buildings contained in the Goose Park and TJ Burns proposed Architectural Conservation Areas (ACAs), the planning authority is advised to review the inclusion of these areas on the list of ACAs unless a clear justification can be provided based on the *Architectural Heritage Protection: Guidelines for Planning Authorities* (DAHG, 2011).**

#### **CE Response:**

On foot of the inclusion of the two areas referred to on the list of ACA's for the County an assessment has been carried out by John Cronin and Associates Archaeology, Conservation, Heritage and Planning Consultants.

The results of the assessment is set out below;

#### **Terrace of cottages at Nos. 1-6 Old Bawn Road, known as Saint Maelruan's Terrace**

Having conducted background research and detailed survey work, we would recommend that South Dublin County Council (SDCC) consider the formal designation of a tightly-defined architectural conservation area (ACA) for this housing, for the following reasons:

The terrace forms a distinctive and largely intact group with significant architectural interest having design typical of a celebrated architect.

As one of the first multiple-unit residential developments in the locality, this terrace also represents a significant example of early urban planning in south Dublin. Although their originally long rear gardens have been truncated and amalgamated by later commercial enterprises, the retention of the road-fronting gardens as well as the lack of high-rise or particularly high-density development in the immediate vicinity has meant that they retain much of their original character after almost a century of residential use. The six houses retain a discreet and distinctive appearance despite being surrounded by later twentieth-century houses. By virtue of their rarity as historic structures in the immediate area, they provide an insight into the local built environment and social history.

The repeating features of the site which typify its uniform character, including the enclosed front gardens, shape of window-openings, wall materials, brick chimney stacks and roof materials, could be identified within an ACA document as specific items which, if conserved collectively, lend a great deal to the overall historic character of the area.

Designation of Saint Maelruan's Terrace as an ACA would help to make sure that any future development or alterations to publicly visible elements of the houses could only take place after the rigorous assessment of proposals

for their appropriateness and to ensure they do not cause significant negative impact on the historic character or visual amenity of the area.

### **TJ Byrne Cottages on Old Bawn Road**

The assessment conducted on the **TJ Byrne Cottages** on Old Bawn Road identifies that they retain little of their original site context or architectural form which has been diminished by infill development of all the rear plots and original garden areas between the houses as well as intensification or dereliction of the original houses. Over or under-development of these individual sites as well as transformation of the surrounding context has undermined their special interest value with remaining elements of architectural significance being much better demonstrated on other similar sites in the vicinity where houses like this form a more distinctive, unified group.

Having conducted background research and detailed survey work, we would recommend that South Dublin County Council (SDCC) *do not* include these buildings within a defined ACA as it is hard to justify same in the context of (a) national architectural heritage guidance and (b) the basis of the much-altered and poor condition of the subject buildings.

Section 3.5.3 of the Draft Plan includes both of these items in the list of Architectural Heritage Areas. On foot of the findings of the report set out below the TJ Byrnes Cottages, Old Bawn Road should now be removed from this list. In addition St Maelruan's Cottage's, Old Bawn Road referred to as 'Goose Park' old Bawn Road should remain on the list with clarification provided that Goose Park/ St Maelruan's Cottages refer to No's 1-6 Old Bawn Road. The reference to these items requiring further investigation be amended to remove No. 14 which refers to TJ Burns (sic) Cottages and add description to No. 13 'Goose Park' as set out in the recommendation.

### **CE Recommendation**

It is recommended that the Draft Plan be amended to retain Goose Park Old Bawn Road on the list of ACA's in section 3.5.3 of the Draft Plan but to amend description to St Maelruan's Terrace (Goose Park), Old Bawn Road and to amend descriptive text to No. 13 (description of ACA) page 120 of Draft Plan on following pages to read as follows

#### **'13. St Maelruan's Terrace (Goose Park), Old Bawn Road, Tallaght**

As one of the first multiple-unit residential developments in the locality, this terrace also represents a significant example of early urban planning in south Dublin. Although their originally long rear gardens have been truncated and amalgamated by later commercial enterprises, the retention of the road-fronting gardens as well as the lack of high-rise or particularly high-density development in the immediate vicinity has meant that they retain much of their original character after almost a century of residential use. The six houses retain a discreet and distinctive appearance despite being surrounded by later twentieth-century houses. By virtue of their rarity as historic structures in the immediate area, they provide an insight into the local built environment and social history.

The repeating features of the site which typify its uniform character, including the enclosed front gardens, shape of window-openings, wall materials, brick chimney stacks and roof materials collectively lend a great deal to the overall historic character of the area. ,

Remove reference to TJ Burne's Cottages from list of ACA's and remove No. 14 (noting further assessment required) from page 120 of the Draft Plan

### 8.3 Environmental Assessments

The Office notes that the environmental report (SEA) concludes that no significant residual adverse impacts are identified in the SEA taking into account the detailed mitigation which has been integrated into the draft Plan. The SEA is considered to be comprehensive and generally consistent with the requirements of the section 28 guidelines.

*The Natura Impact Report (NIR)* concludes that, having incorporated mitigation measures, the draft plan will not adversely affect (either directly or indirectly) the integrity of any European site, either alone or in combination with other plans or projects. The Office notes that the AA process is ongoing and will inform and be concluded at adoption of the Plan.

#### CE Response:

The comments of the OPR are noted.

#### CE Recommendation

No Change to Plan

## 2. General and Procedural Matters

### 9.1 Minor discrepancies

The planning authority is advised that there appears to be discrepancies between the road projects / proposals listed in tables 7.5 and 7.6 in chapter 7 and annotations shown on the land use zoning maps. For example, the upgrade of the Ballyboden Road/Stocking Lane (R115) is identified as a six-year road project in table 7.5 but is shown as a road proposal long-term on the land use zoning maps. This is also the case for the Western Dublin Orbital Route.

#### Observation 13

##### **Observation 13 – Road Projects and Proposals**

**The planning authority is requested to review the six-year road proposals in table 7.5 and medium-long term road objectives in table 7.6 of chapter 7 for consistency with the annotations and legend for same on the land use zoning maps and to resolve any discrepancies.**

#### CE Response:

The issue raised is noted. The annotations and legend on the land use zoning maps will be amended to match the six-year road proposals in table 7.5 and medium-long term road objectives in table 7.6 of chapter 7.

#### CE Recommendation

Amend the annotations and legend on the land use zoning maps to match the six-year road proposals in table 7.5 and medium-long term road objectives in table 7.6 of chapter 7.

## **2.2 Observations, Submission and Recommendations from the Eastern and Midlands Regional Assembly - Submission SD-C195-45**

### **General Introduction**

The submission begins by setting out the role of the Assembly under Section 27 (b) of the Planning and Development Act (as amended) which is to provide an opinion as to whether the draft development plan and its core strategy are consistent with the regional spatial and economic strategy. The submissions, observations and report shall include recommendations as to what amendments, in the opinion of the regional assembly, are required in order to ensure that the draft development plan and its core strategy are so consistent.

The submission also draws attention to the section 12(4) whereby the Chief Executive's Report prepared by the Planning Authority shall summarise the issues and recommendations raised by the Eastern and Midland Regional Assembly and outline the recommendations of the Chief Executive in relation to the manner in which those issues and recommendations should be addressed in the development plan.

The Assembly welcomes the overall the overall approach and effort of South Dublin County Council to coordinate and incorporate policies and objectives, so that they are consistent with the RSES and NPF.

The Assembly considers that the overall Draft South Dublin County Development Plan (CDP), including its core strategy, are consistent with the RSES subject to the observations and recommendations of this submission, which broadly follows the chapter headings of the Draft CDP, which are considered to provide a robust framework for the development of an overall strategy for the proper planning and sustainable development of the County.

### **CE Response:**

The submission from the Eastern and Midland Regional Assembly (EMRA) on the Draft South Dublin County Development plan 2022 - 2028 is noted and welcomed.

### **CE Recommendation:**

No Change to Plan

### **1. Introduction, Strategic Vision and Climate Action**

The Assembly note the statutory framework and planning hierarchy which informs the Draft CDP with reference to relevant policy parameters in Project Ireland 2040 - the National Planning Framework (NPF), the Regional Spatial and Economic Strategy (RSES), the Dublin Metropolitan Area Strategic Plan (MASP), the UN Sustainable Development Goals, and relevant government policies and Ministerial Guidelines. This approach is welcomed in support of the required alignment between local, regional and national planning policy, as required by Section 10 (2) of the Act.

The Assembly also welcome that Climate Action is identified as a significant challenge with climate policies and 'Climate Positive Objectives' integrated in a holistic way throughout the CDP and aligned to the South Dublin Climate

Action Plan 2019-2024. The Assembly also acknowledge that the Draft Plan has been assessed against its impact on the receiving environment through the environmental reports produced.

**CE Response:**

The comments of EMRA are noted and welcomed.

**CE Recommendation:**

No Change to Plan

**2. Core strategy and Settlement Strategy**

The Assembly welcomes the inclusion in Appendix 1 of a Statement of Compliance demonstrating how South Dublin County Council has implemented the relevant policies and objectives of Section 28 Guidelines of the Minister in the Draft CDP and setting out a full list of National and Regional Planning Policy Objectives of the NPF and RSES.

The Assembly notes the publication by the Department of Housing, Local Government and Heritage (DHLGH) of Section 28 Guidelines 'Housing Supply Target (HST) Methodology for Development Planning' in December 2020, and more recently in August 2021, the Draft Guidelines for Development Plans and accompanying Circular 04/2021 which states that "it is intended that planning authorities would have regard to the Draft Guidelines, noting that many development plan review processes are currently underway and are at different stages of completion."

The Assembly also acknowledges and commends the considerable work undertaken by South Dublin to inform the preparation of an evidence-based Core and Settlement Strategy, which includes the preparation of a Land Capacity Analysis, Infrastructural Assessment, Planning Assessment and Settlement Asset Based Analyses, as set out in the Appendices of the Draft CDP.

The Assembly consider the core strategy generally provides a robust framework in demonstrating consistency to national and regional population targets and in identifying future growth opportunities in co-ordination with transport and infrastructure delivery to achieve compact sustainable development, in line with the RSES, subject to the certain observations and recommendations;

**CE Response:**

The comments of EMRA are noted and welcomed.

**CE Recommendation:**

No Change to Plan

**Population Projections:**

The Assembly note the Core Strategy Table 10 of the Draft Plan, projects a total population of 325,285 or an additional 46,518 persons by 2028, which is consistent with the NPF Roadmap and RSES Appendix B (high). It is considered that the application of RSES 'High' population growth scenario is appropriate in the context of achieving compact sustainable growth in existing built-up urban areas, and to support the implementation of the Dublin Metropolitan Area Strategic Plan (MASP) and it is recommended that a statement of justification for same should be included in the core strategy.

**CE Response:**

Chapter 2, Section 2.5 Population and Housing Data of the Core Strategy sets out the information used to inform the preparation of the Core Strategy for the Development Plan period 2022 – 2028. Section 2.5.2 Population - Projections is of particular note in regard to the issue raised above and details how the RSES, guided by the National Planning Framework Implementation Roadmap (the Roadmap), has set low and high population projections for the region up to 2026 and 2031.

This section continues by setting out that 'The Roadmap provides scope to South Dublin County to bring forward the 2031 population figures by up to 25% by 2026. Translating the high RSES projection figures, including the frontloading up to 2026, population projections for the Development Plan period to 2028 is shown under Table 4 (see below extract). The remaining 2026 to 2028 figure was calculated on the basis of a pro rata average year (2 year) of the remaining balance between 2026 and 2031.

**Table 4: 2022 - 2028 Population Projections - Adjusted**

	2016	2026		2028	
		Low	High	Low	High
<b>South Dublin County Council</b>	278,767	315,308	322,808	317,385	325,285
<b>Change (No.) from 2016</b>	-	+36,541	+44,041	+38,618	+46,518
<b>Change (%) from 2016</b>	-	+13.1%	+15.8%	+13.8%	+16.7%
<b>Average Annual Pop growth (2016 - 2028)</b>	-	+3,654	+4,404	+3,218	+3,877

It should also be noted that further details in regard to the application of the 'High' population growth scenario are set out in Appendix 2 Part Core Strategy Methodology.

While the above should be noted it is considered reasonable to include a short statement after Table 4 in the Core Strategy setting out the following:

**Justification Statement:**

*The population projections for the County over the plan period 2022 – 2028 have been applied in accordance with the RSES which has been guided by National Planning Framework Implementation Roadmap. The Roadmap acknowledges the transition of implementing Development Plans and provides scope to bring forward population figures of +25% up to 2026. This simply allows the 2031 targets to be front loaded, it does not provide for the exceedance of the 2031 high figure. The Roadmap outlines South Dublin as a County where this adjustment can be applied. The 2022 – 2028 Development Plan has applied this population adjustment in light of strong construction activity, completed residential units since 2016 and the continued demand for housing within the County.*

**CE Recommendation:**

To include a short justification statement, in Chapter 2 Core Strategy – Section 2.5.2 – Population Projections after Table 4 on page 39, setting out the following:

**Justification Statement:**

The population projections for the County over the plan period 2022 – 2028 have been applied in accordance with the RSES which has been guided by National Planning Framework Implementation Roadmap. The Roadmap acknowledges the transition of implementing Development Plans and provides scope to bring forward population figures of +25% up to 2026. This simply allows the 2031 targets to be front loaded, it does not provide for the



exceedance of the 2031 high figure. The Roadmap outlines South Dublin as a County where this adjustment can be applied. The 2022 – 2028 Development Plan has applied this population adjustment in light of strong construction activity, completed residential units since 2016 and the continued demand for housing within the County.

### **Housing Demand and Supply Targets:**

The Assembly note that the housing supply target for the plan period has been determined in line with Section 28 Guidelines 'Housing Supply Target (HST) Methodology for Development Planning'. It is considered that the 'Housing Strategy and Interim HNDA' provide a robust evidence-based framework to inform the housing policies in the Draft CDP including requirements for specialist provision and social and affordable housing, subject to the publication of any future revised 'Housing Strategy' Guidelines under Section 28 that may require further housing need and demand assessment to be taken into account.

#### **CE Response:**

The comments set out by the Assembly are noted and welcomed. In regard to the Housing Supply Target (HST) Methodology for Development Planning it should be noted however that adjustments to the housing supply target are proposed on foot of recommendation 1 of the Office of the Planning Regulator submission no. 227. In this regard it is recommended that the HST be adjusted over the 6-year life of the plan 2022-2028 as opposed to the current 7.75-year period set out in Table 7 of the Draft Plan.

The details of these changes are set out in the recommendation to the OPR submission under recommendation 1 and Appendix 1 to this report.

#### **CE Recommendation:**

No change arising on foot of this submission however it should be noted however that adjustments to the housing supply target are proposed on foot of recommendation 1 of the Office of the Planning Regulator. The details of these changes are set out in the recommendation to the OPR submission under recommendation 1 and Appendix 1 to this report.

### **Land Capacity and Zoning:**

The Assembly welcomes the inclusion in Appendix 2 Parts 1 (B) and (C) of the Draft CDP of a detailed 'Infrastructure Assessment' and 'Planning Assessment' which respectively set out a detailed appraisal of enabling infrastructure requirements, and of key assets and development potential in the County and neighbourhood areas.

The Assembly welcome the stated focus in the Draft CDP on the delivery of Strategic Development Areas (SDAs) set out in the Dublin MASP.

#### **CE Response:**

The comments of the Assembly are noted and welcomed.

#### **CE Recommendation:**

No Change to plan

### **Tiered Approach to Land Use Zoning:**

The Assembly notes the classification of lands as either Tier 1 (serviced) or Tier 2 (Serviceable) in line with the provisions of NPO72a and appendix 2 of the NPF which is based upon the findings of the infrastructural assessment carried out as part of the Draft Plan.

It is acknowledged that the estimated potential housing yield of existing zoned lands is above what is required to exactly match the housing supply target (HST) for the plan period, and that this is justified in the Draft CDP on the basis of ensuring an adequate supply of zoned lands and to provide for a degree of flexibility in which lands come forward within the lifetime of the Plan.

The Assembly consider that the core strategy will provide for sufficient zoned lands to meet the projected population and housing targets for the County and ensure a scarcity of suitable lands for residential development does not occur during the development plan period, subject to the application of prioritisation measures where a surplus of zoned land is identified with regard to the NPF Implementation Roadmap and a tiered approach to land zoning.

Furthermore the Assembly acknowledge that the Draft Plan has already undertaken an infrastructural and planning assessment to inform order of priority of planned development lands, and it is recommended that the core strategy should clearly set out the proposed phasing of development lands and demonstrate a clear sequential approach in line with RPO 5.5 of the RSES, with a primary focus on the consolidation of Dublin and suburbs and on the delivery of Strategic Development Areas (SDAs) set out in Table 5.1 in the MASP.

#### **CE Response:**

The comments of the Assembly are noted in regard to the Core Strategy and the application of phasing and a sequential approach to development lands in line with RPO 5.5 of the RSES.

*RPO 5.5: Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.*

The provisions set out in Section 5.7 Housing Delivery of the RSES are noted which supports a sequential approach to development with a primary focus on the consolidation of sites within or contiguous to the existing built up and zoned area of Dublin City and suburbs, supported by selected metropolitan settlements that have the capacity to achieve higher residential densities in tandem with the provision of public transport, infrastructure and services.

In this regard and with specific reference to the MASP identified sites it should be noted that significant areas of these lands have been excluded from the land capacity over the Development Plan period except where it is considered a percentage of development can occur within that timeframe. Of the total capacity for the SDA lands, approximately 150 ha providing for more than 7,500 units has been identified as being deliverable over the Development Plan period and is included in the land capacity figures in Table 9.

In addition, and as set out in section 2.6 Core Strategy the following should be noted. The Plan has included an infrastructural assessment, applied a tiered approach to zoning, carried out a planning analysis and deliverability

assessment which has informed a prioritised level of growth of undeveloped land (excluding units/land under construction) for each Neighbourhood Area based on past construction and deliverability was applied with a focus on the SDAs identified under the MASP; amounting to 9,439 units representing a total of 71% of units being within the SDZs and Regeneration Lands (57% at 7,616) and within Fortunestown (14% at 1,823).

In addition, a further allocation of 3,075 (23%) has been provided for within the Dublin City and Suburbs settlement of undeveloped land, excluding land under construction. This facilitates the delivery of a total of 12,514 units, or 94% of the County's growth which exceeds the requirements of NPO 3b and RPO 3.2. The remaining balance has been allocated to the three settlements: Saggart, Newcastle and Rathcoole totalling 746 units (6%), providing for an overall total allocation of 13,260 units. In addition to the units under construction this provided for the supply target of 17,817 units from the Draft Plan Publication date to 2028.

In regard to the Housing Supply Target and Recommendation 1 of the Office of the Planning Regulator submission it should be noted however that figure of 17,817 units has been revised to 15,576 units in line with the 6 year plan period.

Furthermore it should be noted that in accordance with Recommendation 3, Observation 3 and Recommendation 4 of the Office of the Planning Regulator submission relating specifically to the settlements of Newcastle, Saggart, Rathcoole that a sequential approach to development in line with the provisions of NPO9 has been applied which has resulted in the phasing of development in tandem with the delivery of key infrastructure and services, the designation of lands as Strategic Residential Reserve and the redesignation of lands from Res-N to Rural in both Newcastle and Saggart. Details of this approach are set out the response to the Office of the Planning Regulator submission and appendix 1 to this CE Report.

Having regard to the above it is considered that the plan alongside the recommendations arising from the Office of the Planning Regulator submission has clearly set out the proposed phasing of development lands and demonstrate a clear sequential approach to development in line with RPO 5.5 of the RSES

#### **CE Recommendation:**

No Change arising from the issues raised in this submission however on foot of Recommendation 3, Observation 3 and Recommendation 4 of the Office of the Planning Regulator submission a sequential approach to development in line with the provisions of NPO9 has been applied which has resulted in the phasing of development in tandem with the delivery of key infrastructure and services, the designation of lands as Strategic Residential Reserve and the redesignation of lands from Res-N to Rural in both Newcastle and Saggart. Details of this approach are set out the response to the Office of the Planning Regulator submission and appendix 1 to this CE Report.

#### **Settlement Hierarchy:**

The Assembly commends the Council for undertaking an evidence-based analysis of settlements in the County in accordance with the RSES Asset Based Methodology, to inform the designation of settlements in the County Settlement Hierarchy.

It is noted that 'Self Sustaining Towns' are listed above 'Self Sustaining Growth Towns' in core strategy Tables 9, 10 and 12 and it is recommended that the order of presentation of these settlement tiers be switched around to reflect their relative position in the Settlement Hierarchy, as set out in Table 13 of the Draft CDP and to ensure consistency with the RSES Settlement Hierarchy.

The Assembly also welcomes the focus given to the development of key urban centres within Dublin city and suburbs. Table 9 sets out the further breakdown of undeveloped zoned lands within Dublin city and suburbs by greenfield and brownfield sites. Although a majority of greenfield lands are identified, the Assembly acknowledge that a significant proportion of these greenfield lands are designated for planned development in the Strategic Development Zones (SDZs) of Adamstown and Clonburris and also due to their location within Dublin city and suburbs are considered to be consistent with compact growth targets set out in RPO 3.2 of the RSES and NPO 2a of the NPF.

**CE Response:**

The issue raised by the Assembly is noted. It is considered appropriate that the order of presentation of the Self-Sustaining Town (Saggart) and the Self-Sustaining Growth Towns (Rathcoole and Newcastle) be switched around to reflect their relative position in the Settlement Hierarchy, as set out in Table 13 of the Draft CDP and to ensure consistency with the RSES Settlement Hierarchy.

**CE Recommendation:**

Amend Table 9 Land Capacity and Table 10 Core Strategy such that the order of presentation of the Self-Sustaining Town (Saggart) and the Self-Sustaining Growth Towns (Rathcoole and Newcastle) is switched around to reflect their relative position in the Settlement Hierarchy, as set out in Table 13 *RSES Settlement Hierarchy relating to South Dublin County Council* of the Draft CDP and to ensure consistency with the RSES Settlement Hierarchy.

**Self-Sustaining Growth Towns:**

The Assembly notes that units built, under construction and extant permissions account for a significant proportion of the allocated population growth in the settlements of Newcastle and Rathcoole and that these need to be taken into account in the core strategy. Nevertheless, it is further recommended that a clear rationale be set out for the designation of these settlements as growth towns having regard to past and current trends of rapid commuter- focused population growth, low jobs to resident workers ratio indicating a weak employment base and the need for 'catch up' investment in these towns, that would suggest a more appropriate designation as 'Self-Sustaining Towns'.

It is acknowledged however that there is potential to increase local employment options having regard to the proximity of extensive zoned employment lands to the west of Dublin and in particular that Newcastle has potential to become more self-sustaining through the continued provision of commensurate social and physical infrastructure in tandem with phased residential development in the Newcastle Local Area Plan (LAP), and the planned extension of high frequency rail services to Cellbridge-Hazelhatch as part of DART + South West Programme .

It is noted that there is significant remaining zoned undeveloped lands in the two towns without planning permission the majority of which comprise greenfield lands as evidenced by Table 9 and it is further recommended that a phased approach be taken in the development of these lands in line with the recommendations of the NPF and RSES, as outlined in Section 2.3 above.

**CE Response:**

In regard to the justification for the designation of the settlements of Newcastle and Rathcoole as Self-Sustaining Growth Towns the settlement description for this settlement typology is noted which sets out that '*Self-Sustaining Growth Towns with a moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining*'.

Both of these settlements have been allocated a level of population growth in line with their designation and recognising the extent of lands either with permission or with potential for development. In addition, both settlements provide for a moderate level of jobs either within the settlement itself or in close proximity. In the case of Newcastle, Greenogue industrial estate is situated c.500m to the east while Grange Castle Business Park is situated to the north east. In the case of Rathcoole Local shops and retail services along the main street, including car showrooms, pubs, local financial services. From the main street, Greenogue Business Park is located 2km north while Baldonnell employment lands are located 2.5km north-east. Citywest Business Park is also proximate to both.

In terms of transport connections Newcastle is situated c. 6km to Saggart Luas Stop and c3.5km from Hazehatch while proposed bus connects routes will improve public transport provision within the settlement. It is noted that Dart+ will significantly increase the service on the Hazelhatch/Celbridge train line. In the case of transport connections for Rathcoole, the settlement is situated c. 2.5km to Saggart Luas Stop and 7.5km from Hazehatch while proposed bus connects routes will improve public transport provision within the settlement.

In addition to the above and in terms of sustainable transport proposals under SDCC cycle infrastructure programme 'Cycle South Dublin' seek to provide connections between Newcastle and Rathcoole with further proposals for improvements to Saggart Village and Saggart Luas stop.

In regard to the extent of zoned undeveloped lands within the settlement of Newcastle and Saggart the issues raised by the Assembly are noted and correspond with Recommendation 3 and Observation 3 of the Office of the Planning Regulator submission. In this regard it is proposed that a sequential approach to development in line with the provisions of NPO9 be applied which has resulted in the phasing of development in tandem with the delivery of key infrastructure and services, the designation of lands as Strategic Residential Reserve and the redesignation of lands from Res-N to Rural in both Newcastle and Saggart. Details of this approach are set out the response to the Office of the Planning Regulator submission and appendix 1 to this CE Report.

This process will also result in Appendix 2 (Part 2) Core Strategy Methodology – Section 5 Settlement Based Analysis being amended to align with such recommendations.

#### **CE Recommendation:**

No Change arising from the issues raised in this submission however on foot of Recommendation 3, Observation 3 and Recommendation 4 of the Office of the Planning Regulator submission a sequential approach to development in line with the provisions of NPO9 has been applied which has resulted in the phasing of development in tandem with the delivery of key infrastructure and services, the designation of lands as Strategic Residential Reserve and the redesignation of lands from Res-N to Rural in both Newcastle and Rathcoole. Details of this approach are set out the response to the Office of the Planning Regulator submission and appendix 1 to this CE Report.

#### **Self-Sustaining Towns:**

The Assembly notes that the County Hierarchy identifies Saggart as a 'Self-Sustaining Town', defined in the RSES as towns with a high level of population growth and a weak employment base that are reliant on other areas for employment/services and require targeted 'catch up' investment to become more self-sustaining.

It is considered that the proposed designation is appropriate having regard to past trends of rapid population increase and will promote 'catch up' investment in local employment, services and sustainable transport options to enable Saggart become more self-sustaining.

#### **CE Response:**

The comments of the Assembly are noted in regard to the village of Saggart and its designation as a 'self-sustaining town'.

In regard to the settlement of Saggart and arising from Recommendation 4 of the Office of the Planning Regulator submission which required the planning authority to review the extent of land zoned RES-N and change any surplus land without benefit of planning permission, and which is not required to meet its housing target for the plan period, to strategic residential reserve. However, since the publication of the Draft Plan lands to the north along Mill Road have been progressed to stage 2 of the SHD process with a level of development and activity on these lands likely over the plan period. Having regard to this issue and the revisions made to lands in Rathcoole it is proposed to increase the housing target for Saggart from 96 units to 165 units.

In line with the provisions of NPO9 the development of these lands will be subject to a new SLO which will guide the development of these lands in a manner which fully integrates with the adjoining lands to the south, provide a green lung/park space centrally located on the subject lands, a play space, creche, the integration of strong cycling and pedestrian permeability proposals to be agreed to the satisfaction of the Planning Authority and noise mitigation measures along the northern boundary .

Having regard to the above the following sets out the proposals for the settlement of Saggart

- Arising from recommendation 1 of the OPR submission Tables 9 and 10 have been amended. Refer to Appendix 1 for further details.
- Saggart is provided with upward revision to the housing target in table 10 from 96 units to 165 units over the 6-year lifetime of the plan i.e.,2022-2028

#### **CE Recommendation:**

No Change arising from the issues raised in this submission however on foot of Recommendation 4 of the Office of the Planning Regulator submission the following has been recommended.

- Saggart is provided with upward revision to the housing target in table 10 from 96 units to 165 units over the 6-year lifetime of the plan i.e.,2022-2028
- The Inclusion of a new Specific Local Objective under CS8

**CS8 SLO1:** To facilitate the delivery of Phase 1 residential lands at Mill Road Saggart which fully integrates with the adjoining lands to the south and in tandem with the delivery of a park space centrally located on the subject lands, a play space, creche, the integration of strong cycling and pedestrian permeability proposals agreed to the satisfaction of the Planning Authority and the provision of appropriate noise mitigation measures along the northern boundary

Refer to Recommendation 4 Response to the OPR submission and Appendix 1 of this report for further details.

*Rural Areas:*

The Assembly note the provisions of the plan in regard to the rural settlement strategy.

**CE Response:**

The comments of the Assembly are noted.

**CE Recommendation:**

No Change to plan.

**Monitoring/Active Land Management:**

The Assembly welcomes the commitment given in the core strategy to monitor growth at a settlement scale and to pursue active land management measures provided for under legislation including the Vacant Sites levy, Derelict Sites Act and Compulsory Purchase Orders.

**CE Response:**

The comments of the Assembly are noted.

**CE Recommendation:**

No Change to plan.

**Employment Lands:**

The Assembly welcomes the evidence-based approach as part of the core strategy which sets out a baseline analysis for the existing available 624 hectares (ha) of employment lands which are stated to have the potential to generate c31,800 jobs.

The Assembly further acknowledge the here are a further 425 ha of existing Regeneration (REGEN) zoned brownfield land forming part of the Tallaght Town Centre LAP and Naas Road area. The development of REGEN lands will support RPO 5.5 of the RSES that promotes a sequential approach with a focus on the re-intensification of employment lands within the M50 and at selected strategic development areas in the metropolitan area in tandem with the provision of high-quality public transport.

The Assembly consider that the core strategy will provide for sufficient serviced lands for employment to support projected employment growth within the plan period. The Regional Assembly considers the location of strategic employment lands in the Draft CDP is consistent with the Settlement Hierarchy in the RSES and MASP and could be further strengthened by reference to the delivery of strategic employment development lands in Tables 5.1 and 5.2 of the MASP, including Naas Road/Ballymount, Tallaght Town Centre/Cookstown and Grange Castle Business Park in South Dublin.

**CE Response:**

The comments of the Assembly are noted and welcomed.

**CE Recommendation:**

No Change to plan.

**Climate Action:**

The Assembly recognises that the Climate Audit set out at in the core strategy contains policies to reduce climate impact by promoting sustainable settlement patterns whereby the location of people and jobs is promoted in proximity to high capacity of public transport and aligned to the Greater Dublin Area (GDA) Transport Strategy in order to reduce the need for unnecessary private car journeys – and associated emissions.

The Assembly welcomes the inclusion of dedicated Climate Audits in each Chapter of the Draft CDP as part of a holistic and integrated approach in demonstrating how different policy areas contribute to Climate Change Adaptation or Mitigation, and further observations in this regard are set out in the relevant sections of this submission.

The Assembly draw the Council's attention to accelerated climate action measures set out in the Climate Action and Low Carbon Development (Amendment) Bill, published in October 2020, which commits Ireland to interim reductions in GHG emissions including an average 7% per annum reduction from 2021 to 2030 towards net-zero emissions by 2050. The Regional Assembly are currently leading the QGasSP ESPON EU research project to develop a robust methodology for quantifying the GHG impacts of spatial planning policies, which may provide further guidance in this regard.

**CE Response:**

The comments of the Assembly in regard to Climate Action provisions in the plan are noted and welcomed.

**CE Recommendation:**

No Change to plan.

**3. Heritage and Green Infrastructure**

The Assembly welcome the inclusion in the Draft CDP of policies and objectives to protect and enhance the County's unique Natural Cultural and Built Heritage (Chapter 3) and Green Infrastructure (Chapter 4), which is supported by the implementation of the County Heritage Plan and the Biodiversity Action Plan and the identification of key designated sites and sensitive areas on development plan maps.

The Assembly welcomes the inclusion of a dedicated Chapter 4 on Green Infrastructure (GI) and Appendix 4 Green Infrastructure Local Objectives and Case Studies, and the recognition given to GI as a key strategic asset for the County, which can deliver multiple environmental, social and economic benefits. Also welcomed is the integration of an Ecosystem Services Approach and GI policies across the strategic themes of Biodiversity, Sustainable Water Management, Climate Resilience, Recreation and Amenity and Landscape and Heritage, which is considered to provide a robust framework for the development of the County GI Strategy as presented in Figure 4.4 of the Draft CDP.



The Assembly commends the commitment of South Dublin to GI and supports the Council in facilitating the integration of ecosystem services into local policy and plan making, in line with the policy objectives of the RSES and MASP.

**CE Response:**

The comments of the Assembly are noted and welcomed in regard to the provisions of the plan in regard to Chapter 3 - Natural, Cultural and Built Heritage and Chapter 4 Green Infrastructure.

**CE Recommendation:**

No Change to plan.

#### **4. Housing, Placemaking and Neighbourhoods**

The Assembly welcome the inclusion in the Draft CDP of policies and objectives to promote Quality Design and Healthy Placemaking (Chapter 5) and the delivery of Housing (Chapter 6) to meet a range of diverse needs in the County, in tandem with the provision of Community Infrastructure and Open Space (Chapter 8) and to create sustainable communities as set out in Neighbourhoods (Chapter 12).

**Housing:**

The Assembly acknowledges the work that has gone into the preparation of the 'Housing Strategy and Interim HNDA', which provides an evidence-based analysis of housing demand, supply and affordability in the County to inform the housing policies in the Draft CDP including the provision of specialist and social and affordable housing in accordance with Part V of the Act, and to provide for an appropriate housing mix as per SPPR 1 of 'Sustainable Urban Housing: Design Standards for Apartments' (2018).

While the Assembly notes the strategic intent of the Council to promote an appropriate tenure mix and ensure the best use of public lands in HI Objective 19 which states that where residentially zoned Local Authority lands "are used to develop housing, that it is used exclusively for the delivery of social, affordable cost retail and affordable purchase homes" it is nevertheless suggested that housing policies should seek to ensure a greater degree of flexibility in development that comes forward within the lifetime of the plan and to ensure consistency with NPO 37 of the NPF and SPPR 1 of Section 28 Apartment Guidelines, which require the appropriate housing mix be informed by an evidence based HNDA as set out above.

The Assembly further notes the inclusion of a Rural Housing Strategy to manage housing the rural area. In this regard the Assembly welcome the inclusion of Policy H17 to manage rural generated housing in alignment with Circular SP 5/08 'Rural Housing Policies and Local Need Criteria in Development Plans' and the stated objective of the Council to commence a review of the Rural Housing Policy following the adoption of the Draft CDP.

**CE Response:**

The issue raised by the assembly are noted in regard to Tenure Mix and the provisions of H1 Objective 19. This issue has also been raised by the Office of the Planning Regulator under Observation 7.

**H1 Objective 19:**

*To ensure that where Local Authority public lands zoned Res/Res N or future zoned Res/Res N local authority lands are used to develop housing, that it is used exclusively for the delivery of social, affordable cost rental and affordable purchase homes.*

It should be noted that H1 Objective 19 is included in the Draft Plan on foot of Motions agreed during the Council meetings in June 2021 by the elected members. While the observations of the OPR are noted it is the view of the Council that the wording as set out, proposed through the pre-draft motion process and voted for by the members should remain as currently worded.

Furthermore the point made that housing policies should seek to ensure a greater degree of flexibility in development that comes forward within the lifetime of the plan and to ensure consistency with NPO 37 of the NPF and SPPR 1 of Section 28 Apartment Guidelines, which require the appropriate housing mix be informed by an evidence based HNDA as set out above, is acknowledged. This issue has also been raised by the Office of the Planning Regulator under Recommendation 7 which specifically relates to Policy H1 Objective 13. In response to the OPRs Recommendation a minor adjustment to the H1 Objective 13 is proposed which will read as follows:

### **H1 Objective 13**

*Proposals for residential development shall provide a minimum of 30% 3-bedroom units, **a lesser provision may be acceptable where it can be demonstrated that:***

- there are unique site constraints that would prevent such provision or*
- that the proposed housing mix meets the specific demand required in an area, having regard to the prevailing housing type within a 10-minute walk of the site and to the socio-economic, population and housing data set out in the Housing Strategy and Interim HNDA.” (emphasis added)*
- **the scheme is a social and/or affordable housing scheme***

### **CE Recommendation:**

Amend H1 Objective 13 to read as follows:

*Proposals for residential development shall provide a minimum of 30% 3-bedroom units, **a lesser provision may be acceptable where it can be demonstrated that:***

- there are unique site constraints that would prevent such provision or*
- that the proposed housing mix meets the specific demand required in an area, having regard to the prevailing housing type within a 10-minute walk of the site and to the socio-economic, population and housing data set out in the Housing Strategy and Interim HNDA.” (emphasis added)*
- **the scheme is a social and/or affordable housing scheme***

### **Healthy Placemaking:**

The Assembly welcomes the inclusion of policies to promote residential consolidation in urban areas and a dedicated Chapter 5 that promotes quality design and healthy placemaking.

The Council are also to be commended for their commitment to promoting good urban design in the public realm as evidenced by the preparation of the County Height and Density Guide in Appendix 10.

The Assembly welcome the inclusion of Chapter 8 Community Infrastructure and Open Space informed by a Social Infrastructure Audit and the green networks set out in the plan connecting key open spaces and parks. Such measures will form a key component in contributing towards healthy placemaking.

The Assembly also welcome the policy objectives which support the integration of sustainable urban drainage systems (SUDS) and natural solutions to enhance biodiversity along with the provision of sports and recreation facilities in the County including implementation of the Council's Play Space Programme.

#### **CE Response:**

The comments of the Assembly are noted and welcomed in regard to the provisions of the plan in Chapter 5 Quality Design and Healthy Placemaking and the inclusion of Chapter 8 Community Infrastructure and Open Space informed by a Social Infrastructure Audit and the green networks set out in the plan connecting key open spaces and parks and the integration of sustainable urban drainage systems (SUDS) and natural solutions to enhance biodiversity along with the provision of sports and recreation facilities in the County including implementation of the Council's Play Space Programme.

#### **CE Recommendation:**

No Change to plan.

## **5. Sustainable Movement**

The Regional Assembly welcome the stated commitment in this Chapter, to integrated transport and land use, promoting sustainable mobility including walking and cycling and public transport, and placing the connected neighbourhood at the core of the approach to placemaking in the Draft CDP.

The Council is to be commended for its early engagement with the National Transport Authority and in undertaking Sustainable Movement Studies for each of the seven Neighbourhood Areas and incorporating mode shift targets into the planning and design of future development in the County with specific targets for car-based trips (50%), walking (15%) cycling (10%), rail (5) and bus (20%) trips.

The Assembly also welcome the progress made by the Council in developing Cycle South Dublin Routes and Projects, set out in Table 7.1 of the Draft CDP, promoting active travel to schools and a proactive approach that recognises the role of road and street design and connected neighbourhoods as a core element of placemaking.

The Assembly also supports the continued roll out of walking and cycling and public realm improvements in response to the COVID-19 pandemic, which should incorporate principles of universal design and monitoring to inform permanent solutions where clear benefits are identified and support implementation of the Greater Dublin Area (GDA) Cycle Network.

The targeted mode shift to sustainable transport will be facilitated by the delivery of key public transport infrastructure projects. The Council's attention is brought to Section 5.6 Key Transport Infrastructure in the Metropolitan Area and Section 8.4 Transport Investment Priorities of the RSES including Table 8.4 Road Projects in the RSES. In this regard, it is noted the proposed Western Dublin Orbital Route in Table 7.5 of the Draft CDP and its

delineation on Land Use Zoning Maps may be premature pending the outcomes of the current Review of the NTA Transport Strategy and it is recommended that the Draft CDP be accordingly reviewed and amended to ensure consistency with the RSES and with the NTA Transport Strategy for the GDA 2016-2035, or any update thereof.

#### **CE Response:**

The comments of the Assembly are noted and welcomed in regard to the provisions of the plan in Chapter 7 Sustainable Movement.

The points raised in regard to the proposed Western Dublin Orbital Route in Table 7.5 of the Draft CDP and its delineation on Land Use Zoning Maps are duly noted. Commentary on this route was also received from the OPR submission 227 and the National Transport Authority submission 245.

In this regard It should noted that the National Transport Authority under submission 245 welcome the role of the Transport Strategy in determining any future requirement there may be for the Western Orbital Route the function of which would be to provide resilience to the M50 in particular between the N7 and N4 which would include provision for sustainable transport modes along its length. It is further stated that any such route would require protection from inappropriate forms of development which may compromise this function and that an extension of this route from the N7 to the N81 would have to be demonstrated against the Transport Strategy's objectives.

The submission from the NTA recommends that the wording for the Western Dublin Orbital Route in table 7.5 be amended to include reference to its primary function in the provision of resilience to the operation of the M50, and that justification for any further extension from the N7 to the N81 would be required against the Transport Strategy's objectives.

In this regard section 7.7.2 'New Streets and Road Proposals sets out details in regard to the strategic road network. Within this section Table 7.5 outlines a Six Year Road Programme, which is subject to available funding. The Western Orbital Route is identified as having the following function:

*New road from N81 to the Link between the N81, N7 and the N4 with a route Leixlip Interchange by-pass function around Rathcoole and Saggart. The need for this route, further connections and possible alternative routes will be determined through the review of the NTA's GDA Strategy and in consultation with TII and relevant local authorities. In any such route a primary objective of South Dublin County Council shall be to protect the scenic Liffey Valley parklands, and amenities at Lucan Demesne and St Catherine's Park and Lucan Village and no proposals to continue a road over these lands will be considered.*

The points raised by the NTA in their submission are noted in regard to the function of this route between the N7 and N4 being to provide resilience to the M50 and the requirements for this route to be protected from inappropriate development which may compromise this function.

It is further noted that the extension of this route from the N7 to the N81 would need to be demonstrated against the Transport Strategies objectives.

In this regard it is considered reasonable to amend the wording in Table 7.5 in order to make reference to the proposed route and its function between the N7 and N4 and furthermore to include wording in regard to the required justification for any extension to this route from the N7 and N81 in line with the Transport Strategy Objectives.

#### **CE Recommendation:**

No change to the Draft Plan arising from the points raised by the Assembly however in line with the provisions set out in the NTA submission it is proposed to carry out the following;

Amend Table 7.5 and the Description and function of the Western Orbital Route as follows:

From:

Description: *New Road from N81 to the Leixlip Interchange*

Function: *New Road from N81 to the Link between the N81, N7 and the N4 with a route Leixlip Interchange by-pass function around Rathcoole and Saggart. The need for this route, further connections and possible alternative routes will be determined through the review of the NTA's GDA Strategy and in consultation with TII and relevant local authorities. In any such route a primary objective of South Dublin County Council shall be to protect the scenic Liffey Valley parklands, and amenities at Lucan Demesne and St Catherine's Park and Lucan Village and no proposals to continue a road over these lands will be considered.*

To:

Description-New Road *from the N7 to the N4 with a potential extension to the N81*

Function:

*New Road to link between the N7 and the N4 Leixlip Interchange with a route by-pass function around Rathcoole and Saggart and the potential for a further extension of this route from the N7 to the N81. The function of this route would be to provide resilience to the M50 in particular between the N7 and N4 and further connections and possible alternative routes will be determined through the review of the NTA's GDA Strategy and in consultation with TII and relevant local authorities.*

*In any such route a primary objective of South Dublin County Council shall be to protect environmentally sensitive areas including the scenic Liffey Valley parklands, and amenities at Lucan Demesne and St Catherine's Park and Lucan Village and no proposals to continue a road over these lands will be considered.*

## **6. Economic Development and Employment**

The Assembly welcomes the inclusion of a Chapter on Economic Development and Employment which sets out the economic context and profile and Economic Strategy for the County under the themes of; Green and Innovative Economy; Urban Growth, Regeneration and Placemaking; Building on Clusters; and a Learning Economy.

The proactive approach to planning for the future development of space extensive uses is welcomed and could be further strengthened by reference to the relevant RPO 5.5 and Guiding Principles for the Location of Strategic Employment and Investment and Integrated Transport and Landuse in Sections 6.3 and 8.3 of the RSES.

The Assembly particularly welcome the inclusion of Policy EDE7 to ensure the appropriate location of space extensive uses such as data centres and to require such enterprises demonstrate capacity for onsite renewables, energy efficiency and other climate positive measures that will support sustainable economic development in the County.

The Draft CDP also recognises the economic and tourism potential of leisure, cultural and natural assets in the County supported by the implementation of the County Tourism Strategy and alignment with Failte Ireland's key tourism brands.

### **Retail:**

The Assembly consider the County Retail Hierarchy as set out in Table 9.1 to be consistent with the Settlement Hierarchy and the Retail Hierarchy set out in Table 6.1 of the RSES.

The need for the Retail Planning Guidelines for Planning Authorities (2012) to be updated is acknowledged by the Assembly with the Draft Plan including a stated intention to review the County Retail Strategy following the publication of any superseding guidance of an updated regional strategy.

The Assembly notes that the capacity for retail development appears to be sufficient to align with planning population growth however in the interest of clarity it is considered that the Draft CDP should include a general statement to confirm no significant additional retail floor space is proposed to be rezoned within the plan period.

This section of the submission concludes by setting out that the Eastern and Midland Regional Assembly carried out analysis to identify which urban centres are most exposed to economic disruption due to the COVID-19 pandemic, as well as an economic analysis of co-working spaces to inform targeted supports and investment, and these publications can be found on at [www.emra.ie](http://www.emra.ie).

#### **CE Response:**

The comments of the Assembly are noted and welcomed in regard to the provisions of the plan in Chapter 9 Economic Development and Employment.

#### **CE Recommendation:**

No Change to plan.

## **7. Energy and Environmental Infrastructure**

The Assembly welcome the proactive approach to energy planning in South Dublin set out in Chapter 10: Energy and the range of policy supports set out in Chapter 11: Infrastructure and Environmental Services in relation to the protection of environmental quality, flood risk management, provision of adequate water supply and wastewater treatment, sustainable management of surface water and minimising waste in accordance with the principles of the circular economy.

The Assembly also welcome the ongoing implementation of the South Dublin Climate Change Action Plan.

The Assembly note the contents of Chapter 10 Energy and Appendix 9 which address the requirements of the DHPCLG Interim Guidelines on Statutory Plans, Renewable Energy and Climate Change (2017).

The submission further notes the Landscape Character Assessment (LCA) updated in 2021 accompanies the Draft CDP and that a policy objective is included to review the current Wind Energy Strategy for the County during the lifetime of the plan having regard to any updated Wind Energy Guidelines, which is welcomed.

This section of the submission concludes by making reference to Chapter 11 and the list of contents within this chapter.

#### **CE Response:**

The comments of the Assembly are noted and welcomed in regard to the provisions of the plan set out in Chapter 10 Energy and Appendix 9, Chapter 11: Infrastructure and Environmental Services, the implementation of the South Dublin Climate Change Action Plan, the Landscape Character Assessment (LCA) and the inclusion of an objective to

review the current Wind Energy Strategy for the County during the lifetime of the plan having regard to any updated Wind Energy Guidelines

**CE Recommendation:**

No Change to plan.

**Flood Risk Management:**

The Assembly note that an appraisal of the potential impacts of climate change was carried out as part of the Strategic Flood Risk Assessment (SFRA) with regard to the OPW climate change parameters in the Flood Risk Management Climate Change Sectoral Adaptation Plan (2019). The Assembly direct the attention of the Council to RPO 7.43 of the RSES and the need to ensure the resilience of critical infrastructure that is capable of withstanding, adapting and recovering from extreme weather events.

The submission notes that the SFRA South Dublin has been carried out in accordance with the OPW Flood Risk Assessment Guidelines for Planning Authorities (2009) and provides an assessment of flood risk within the County accompanied by a series of Flood Maps to identify areas at potential risk of flooding and to highlight development areas that require more site-specific assessment in accordance with the Guidelines.

The Assembly consider the SFRA recommendations in regard to stormwater management and SUDS and for riparian corridors and buffer zones along watercourses that have been incorporated in the County Green Infrastructure Strategy and development plan maps as an extremely positive addition to the Draft CDP. The Assembly direct the attention of the Council to the publication by Inland Fisheries Ireland of 'Planning for Watercourses in the Urban Environment' guideline document.

In regard to Air Quality the Assembly highlight the 'Dublin Regional Air Quality Management Plan and the 'Dublin Agglomeration Environmental Noise Action Plan' which has established a number of air quality monitoring stations which provide up to date information on air quality within the County.

**CE Response:**

The comments of the Assembly are noted and welcomed in regard the Strategic Floor Risk Assessment carried out as part of the Development Plan process. In this regard it should be noted that the OPR under Recommendation 8 and the requirement to update the SFRA for the County to ensure full compliance with the requirements of *The Planning System and Flood Risk Management, Guidelines for Planning Authorities* (2009).

**CE Recommendation:**

No Change to plan foot of the points raised by the Assembly however please refer to the OPR CE Response and CE Recommendation set out under Recommendation 8 of the OPR Submission 227.

**8. Implementation and Environmental Reports**

The Assembly welcomes the inclusion of a dedicated Chapter 13: Implementation and Monitoring, which sets out development standards, land use zoning objectives and criteria that arise out of the policies and objectives of the Draft

CDP, which will ensure that future development occurs in an orderly manner and are considered to provide a comprehensive framework for the assessment of planning applications in the County.

The Assembly commend the Council for the inclusion of monitoring mechanisms to ensure effective delivery of the CDP and for greater transparency on the progress made in its implementation.

The Assembly also direct the attention of the Council to the development of an emerging Regional Development Monitor by the Regional Assembly, which is aligned to National and Regional Strategic Outcomes in the NPF and RSES, and which may provide additional guidance in monitoring the delivery of local authority development plans.

The Assembly also welcomes the preparation of the Draft CDP in tandem with the required environmental processes, namely Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA).

The Assembly also note the subsequently published Errata to the Draft Plan and the environmental assessments which accompany that report.

**CE Response:**

The comments of the Assembly are noted and welcomed in regard to Chapter 13 Implementation and Monitoring and the Environmental Reports.

The Assembly's development of a Regional Development Monitor, which is aligned to National and Regional Strategic Outcomes in the NPF and RSES, and which may provide additional guidance in monitoring the delivery of local authority development plans is also noted and welcomed.

**CE Recommendation:**

No Change to plan.

**Conclusion:**

The submission concludes by setting out that the Assembly consider that the Draft South Dublin County Development Plan 2022-2028, and in particular the core strategy, can achieve consistency with the Regional Spatial and Economic Strategy (RSES) 2019-2031 by addressing the recommendations and observations set out above.

The Assembly further welcome the publication of the Draft Plan which marks the beginning of the alignment of planning policy at County and levels with Regional and National Policy.

**CE Response:**

The concluding remarks are noted and welcomed.

**CE Recommendation:**

No Change to plan



### 2.3 Observations, Submission and Recommendations from the National Transport Authority

Core Strategy - Residential Land		
Submission No.	Submission Summary	CE response and Recommendation
<a href="#">SD-C195-245 National Transport Authority</a>	<p>The submission supports the approach being taken in the core strategy as it relates to the accommodation of all of the County's growth within the built-up area or within previously zoned lands, which are contiguous with the existing built-up area.</p> <p>The submission also recommends that the approach taken to the Core Strategy is maintained in the next stages of the Development Plan process and that no additional land is zoned for residential development.</p>	<p><b>CE Response:</b></p> <p>The NTAs submission is welcomed and comments in relation to their support of the core strategy are noted.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Plan.</p>

Development of Centres		
Submission No.	Submission Summary	CE response and recommendation
<a href="#">SD-C195-245 National Transport Authority</a>	<p>The submission recommends that Policies EDE9, EDE10 and EDE11 are strengthened by reference to an objective to the development / redevelopment of these centres over time, in a manner which is based on a progressive increase in the use of public transport, walking and cycling, with a corresponding reduction in car use.</p>	<p><b>CE Response:</b></p> <p>The submission seeks the inclusion of additional wording to objectives EDE9 – Retail in Tallaght Town Centre, EDE10 Liffey Valley – Major Retail Centre and EDE11 Retail Clondalkin – Town Centre and development within these areas with an emphasis on the progressive increase in the use of public transport, walking and cycling and corresponding reduction in car use.</p> <p>While the premise of the proposal is noted it is considered that the vision for Chapter 7 Sustainable Movement “<i>To Increase the number of people walking, cycling and using public transport and reduce the need for car journeys.....which is underpinned by a number of policy</i></p>

		<p>provisions and objectives in particular SM1 <i>“Promote ease of movement within, and access to South Dublin County, by integrating sustainable land-use planning with a high-quality sustainable transport and movement network for people and goods”</i>, SM2 <i>“Re-balance movement priorities towards sustainable modes of travel by prioritising the development of walking and cycling facilities and encouraging a shift to active travel for people of all ages and abilities, in line with the County targets namely”</i> and SM3 <i>“Promote a significant shift from car-based travel to public transport in line with County targets and facilitate the sustainable development of the County by supporting and guiding national agencies in delivering major improvements to the public transport network”</i> already address this issue and will ensure that such centres develop in a manner which is based on a progressive increase in the use of public transport, walking and cycling, with a corresponding reduction in car use.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Plan.</p>
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<b>Economic Development and Employment</b>		
<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation</b>
<a href="#">SD-C195-245 National Transport Authority</a>	<p>The submission supports the overall thrust of Policy CS5 but requests clarity and direction on the locations where such high-intensity employment generating uses would be appropriate.</p> <p>The submission recommends that Policy CS5 is amended or augmented to provide a clear statement that development in which high-intensity uses such as office is the primary use will not be permitted in greenfield locations, not benefitting from high capacity public transport services.</p>	<p><b>CE Response:</b></p> <p>Policy CS5 Objective 1 aims to focus high intensity employment generating uses around high-capacity public transport nodes.</p> <p>Chapter 9 section 9.2.2 Urban Growth, Regeneration and Placemaking sets out <i>“South Dublin County’s growth is set out in the core strategy and settlement strategy in Chapter 2.</i></p> <p><i>Such Population growth must be supported by growth in jobs if we are to develop in a compact manner and reduce the need to commute. In</i></p>

	<p>The submission is of the view that such developments could be considered more appropriate on brownfield sites within the Tallaght and Clondalkin Town Centre areas; the Naas Road regeneration lands; Liffey Valley and Clonburris; or existing built-up areas served by high capacity public transport.</p>	<p><i>achieving this at a spatial level, the location of employment will be important.</i></p> <p><i>Priority will be given to people intensive enterprise where there is good public transport, services and appropriate infrastructure". This section goes on further to state "South Dublin County's regeneration areas, at the Naas Road/Ballymount and Cookstown in Tallaght, are well located to provide for this intensification, and will promote this type of use" and also refers to the ongoing preparation of a masterplan for the Naas Road lands which will further inform land use for the area.</i></p> <p>Policy EDE4 Objective 4 is also relevant in this instance.</p> <p><i>To direct people intensive enterprise and employment uses such as major office developments (&gt;1,000sq.m gross floor area) into appropriately zoned lands subject to their location within approximately 500 metres of a high frequency urban bus service and/or within 1000 metres walking distance of high capacity transport stops (Train/Luas), and to demonstrate the required walking distance or provision of a permeability project, in accordance with the Permeability Best Practice Guide (2013), to achieve same</i></p> <p>Given the above provisions set out in Chapter 9 it is considered that the locations highlighted in the submission are already identified and broadly covered in the criteria set out in the Draft plan.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Plan.</p>
<p><a href="#">SD-C195-245 National Transport Authority</a></p>	<p>The submission welcomes the overall thrust of Policy EDE4. It suggested there may be scope, however, for strengthening some of the objectives to provide greater direction.</p>	<p><b>CE Response:</b></p> <p>The proposal put forward for strengthening the objectives under Policy EDE4 is noted. However, the provisions set out are considered sufficient to ensure that people intensive enterprise and employment</p>

	<p>The submission recommends that Policy EDE4 - Objective 4 is strengthened by stating that such developments will not be permitted in locations other than those set out in the draft plan text;</p> <p>and that Policy EDE4 Objective 14 is amended by replacing the wording “Traffic Movement Study” with “Local Transport Plan”;</p>	<p>uses are directed to locations which are accessible by sustainable transport modes.</p> <p>EDE4 Objective 4 states:</p> <p><i>‘To direct people intensive enterprise and employment uses such as major office developments (&gt;1,000sq.m gross floor area) into appropriately zoned lands subject to their location within approximately 500 metres of a high frequency urban bus service and/or within 1000 metres walking distance of high capacity transport stops (Train/Luas), and to demonstrate the required walking distance or provision of a permeability project, in accordance with the Permeability Best Practice Guide (2013), to achieve same.’</i></p> <p>In addition, it is considered that the vision for Chapter 7 and provisions of Policies SM1, SM2 and SM3 as detailed above further enhance and strengthen the provision of EDE4 through the integration of land use planning with high quality public transport, promoting sustainable modes of travel with an emphasis on walking and cycling and a shift away from car-based travel.</p> <p>The amendment of EDE4 Objective 14 to replace a traffic movement study for Clondalkin LAP with a Local Transport Plan is considered reasonable.</p> <p><b>CE Recommendation:</b></p> <p>Amend EDE4 Objective 14 to read:</p> <p><b>EDE4 Objective 14:</b></p> <p>To prepare a LAP for Clondalkin, the extent of the boundary to be defined,</p> <p>which will be guided by the <i>Local Area Plans Guidelines for Planning Authorities, 2013</i> (Department of the Environment, Community and</p>
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		<p>Local Government) or any superseding guidelines and which will incorporate:</p> <p>A vision for the development of Clondalkin.  Wider urban design principles.  Framework plans for larger infill sites.  A Conservation Plan.  A local Green Infrastructure strategy derived from the County GI Strategy.  <del>Traffic movement study.</del> Local Transport Plan.</p>
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Housing - Permeability		
Submission No.	Submission Summary	CE response and recommendation
<a href="#">SD-C195-245 National Transport Authority</a>	<p>The NTA considers that Policy H7 Objective 3, Residential Design and Layout, does not provide sufficient commitment to the requirement to provide for pedestrian and cycle permeability. The submission points out that permeability schemes which open up formerly disused lands, providing passive supervision through increased activity, and enhanced security through lighting, have the potential to reduce anti-social behaviour.</p> <p>It is recommended that the references to anti-social behaviour and vehicle permeability schemes are removed from H7 Objective 3. This would provide a commitment in the Plan to the provision of walking and cycling links in new and existing residential areas throughout the County and ensure that sustainable modes are given sufficient priority in this section, in accordance with the NTA's Permeability: A Best Practice Guide.</p>	<p><b>CE Response:</b></p> <p>H7 Objective 3 supports the principle of permeability schemes that provide improved connections between housing estates and their surrounds for walking and cycling whilst taking account of anti-social behaviour, and only progressing vehicle permeability schemes where necessary.</p> <p>The wording of objective H7 Objective 3 has been crafted to support the principle of permeability schemes throughout the County in a manner which takes account of existing or potential occurrences for antisocial behaviour to occur while also stating that vehicle permeability schemes will only be progressed where necessary.</p> <p>It is not considered that the reference to anti-social behaviour in anyway dilutes or results in a weakened commitment from the Council to the provision of permeability schemes but merely ensures that consideration is given to any potential for anti-social behaviour at an early stage and where such circumstances are found to exist or have the potential to exist, design measures can be developed and</p>

		<p>incorporated in order to mitigate against the potential for such anti-social behaviour.</p> <p>It is considered that the inclusion of ‘only progressing vehicle permeability schemes where necessary’ could dilute the purpose of the objective for cycle and pedestrian permeability and should be omitted. Furthermore, the point made by the NTA that it is not clear in what scenario these measures would be necessary is noted.</p> <p>The provision of such schemes will be carried out in accordance with the NTA’s Permeability: A Best Practice Guide.</p> <p><b>CE Recommendation:</b></p> <p>Amend H7 Objective 3 to read:</p> <p><i>‘To support the principle of permeability schemes that provide improved connections between housing estates and their surrounds for walking and cycling whilst taking account of anti-social behaviour.’ <del>and only progressing vehicle permeability schemes where necessary.</del></i></p>
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<b>Local Transport Plans</b>		
<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation</b>
<a href="#">SD-C195-245 National Transport Authority</a>	<p>The submission acknowledges the economic importance of Grange Castle and Citywest on a local and regional scale. However, it is stated that it is not clear how their continued growth – and the growth of other major employment sites in the County – are to be provided for and managed from a sustainable transport perspective.</p> <p>It is submitted that EDE5 SLO1 and SLO2 also place an excessive emphasis on landscaping and the campus style, as such parkland design forms tend to militate against the provision</p>	<p><b>CE Response:</b></p> <p>The particular policy and objective being referenced in the submission are:</p> <p><i>EDE5 SLO1: To ensure that the campus style environment in Citywest is maintained to promote an attractive landscaped setting for the existing and future business within the business park.</i></p>

	<p>of sustainable transport modes due to their low-density, extensive layouts. As such, the scope of Policy EDE5 would benefit from being broadened to include transport considerations.</p> <p>The submission recommends that Policy EDE5 and supporting objectives are amended to include a statement that the phased expansion of City West and Grange Castle shall be subject to a Local Transport Plan agreed with the NTA and TII and that the form of development provided for would facilitate investment in and promote the use of sustainable transport.</p>	<p>EDE5 SLO2: <i>To provide for an attractive campus style setting to encourage the investment of hi-tech, hi-tech manufacturing, and research and development enterprise at Grange Castle Business Park.</i></p> <p>These SLOs are set out under <b>Policy EDE5: Building on Clusters Support clustering, by creating, maintaining, or upgrading economic strongholds in a favourable business ecosystem.</b></p> <p>It is considered that the clustering of businesses is a positive one not only for the business environment but also to achieve a carrying capacity to provide for public transport. It is noted that Citywest is a largely established business campus which is set out in a campus style environment, and which has been very successful. It is located adjacent to the LUAS red line and improving bus services and there is limited potential for further growth and intensification in this area. The Planning Authority has, at times, had planning applications which seek to fence off certain areas contrary to the open style layout which sets the character of the business park. In that regard, EDE5 SLO1 is considered important in order to retain the attractiveness of this campus to employers and employees.</p> <p>With regard to Grange Castle, this is a growing business park with a large area to the west to undergo master planning in 2022. It is considered reasonable to include for a local transport plan for this area.</p> <p><b>CE Recommendation:</b></p> <p>Amend EDE5 SLO2 to read as follows:</p> <p><i>To provide for an attractive campus style setting to encourage the investment of hi-tech, hi-tech manufacturing, and research and development enterprise at Grange Castle Business Park <b>the expansion of which will be subject to a masterplan incorporating a local transport plan in consultation with the NTA and TII.</b></i></p>
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Mode Share Targets		
Submission No.	Submission Summary	CE response and recommendation
<a href="#">SD-C195-245 National Transport Authority</a>	<p>The submission states that the Draft Plan clearly sets out the ambition of the local authority in placing sustainable transport to the fore and demonstrates a commitment to an evidence-based approach to this area.</p> <p>The submission recommends that the comprehensive and ambitious approach taken to sustainable mobility is taken forward into the next stage of the Plan, in order that provision is made for the key transport priorities for the County, and in order that transport planning and land use planning in South Dublin are fully integrated.</p>	<p><b>CE Response:</b></p> <p>The comments of the Authority are noted and welcomed. In line with the provisions of Policy SM1 the Plan is committed to promoting ease of movement within, and access to South Dublin County, by integrating sustainable land-use planning with a high-quality sustainable transport and movement network for people and goods.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Plan.</p>
<a href="#">SD-C195-245 National Transport Authority</a>	<p>The submission welcomes the evidence based approach taken in reaching viable mode share targets. It is noted that POWSCAR Census data is used in this regard and that the baseline data is for work and school trips only, whereas the targets appear to relate to all trips.</p> <p>The submission is of the view that the proposed mode share targets reflect an achievable ambition for this development plan period.</p> <p>The submission recommends that a statement is added to the Draft Development Plan which clarifies that the figures in Table 7.0 relate to short-term targets, i.e. within the development plan period, and that as transport investment provides for further improvement in bus, rail and cycling schemes are developed, the mode share outcomes for cycling and public transport will also rise.</p>	<p><b>CE Response:</b></p> <p>The Planning Authority worked with the NTA in the analysis of mode share in the County using POWSCAR Census data. At County level a target for all trips was derived to provide for clear mode share targets at County level. More detail was provided at neighbourhood level which will inform measures to achieve the County target. The NTA's comments are noted.</p> <p>The request for the inclusion of the wording – ‘short term targets’ within table 7 is also noted and considered to be a reasonable request.</p> <p><b>CE Recommendation:</b></p> <p>Amend the heading of Table 7.0 to include a footnote as follows:</p> <p>From: Table 7.0 Existing and Target Mode Share (percentage)</p> <p>To: Existing and Target<sup>1</sup> Mode Share (percentage)</p> <p><sup>1</sup> Note this relates to targets within the lifetime of the Development Plan. As transport investment provides for further improvements in bus, rail and cycling</p>



		schemes, the mode share outcomes for cycling and public transport will also rise.
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Parking Standards		
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Submission No.	Submission Summary	CE response and recommendation
<a href="#">SD-C195-245 National Transport Authority</a>	<p>The submission welcomes the commitment given in section 13.8.3, that 15-20% of all spaces in residential and non-residential developments will be provided with EV charging points and that the remainder shall be future-proofed for same.</p> <p>The submission recommends that the approach taken to ensuring sufficient provision is made for the increasing ownership and use of electric vehicles for car-based trips is taken forward to the next stage of the Development Plan, consistent with Government targets.</p>	<p><b>CE Response:</b></p> <p>The issues raised in regard to the requirements for EV Charging points within new developments are noted and welcomed.</p> <p>In this regard Statutory Instruments No. 393/2021_European Union (Energy Performance of Buildings) Regulations 2021 is also noted. On foot of this it is considered appropriate to amend the first bullet point of section 13.8.3 to remove the reference to 15-20% and replace this with a minimum 20%.</p> <p><b>CE Recommendation:</b></p> <p>Amend the first bullet point of section 13.8.3 as follows:</p> <p><b>From:</b></p> <p>EV charging shall be provided in all residential, mixed use and commercial development and shall comprise 15% - 20% of the total parking spaces provided, with higher provision within this range required in urban areas.</p> <p><b>To:</b></p> <p>EV charging shall be provided in all new residential, mixed use and commercial development and shall comprise a minimum of 20% of the total parking spaces provided (or as may be further required by</p>

		legislation), with higher provision within this range required in urban areas, with the remainder of spaces to be future proofed.
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<b>Quality Design and Healthy Placemaking</b>		
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<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation</b>
SD-C195-245 National Transport Authority	<p>The submission states Policy QDP6, which refers to a number of attributes which contribute to the development of a successful and attractive public realm but notes that the direct link between transport and movement, and the public realm, is not referenced.</p> <p>The submission recommends that an additional objective is placed under Policy QDP6 which states that the local authority will ensure, in cooperation with the NTA and any other relevant agencies, that projects which affect the public realm will ensure that the needs of pedestrian, cyclists and public transport users are considered fully, and that transport schemes compliment any public realm objectives that apply.</p>	<p><b>CE Response:</b></p> <p>Policy QDP6 sets out to promote a multi-disciplinary and coordinated approach to the delivery and management of the public realm within South Dublin County. The issue raised by the Authority is noted however Policy QDP6 sits within a wider spectrum of policy provisions which make up 'The Plan Approach' which aims to deliver sustainable and successful neighbourhoods ensuring that all development is designed and developed around eight principles so that every opportunity is harnessed to drive and support the vision for South Dublin County to create attractive, connected and functional places to live, work, visit, socialise and invest in.</p> <p>Connected neighbourhoods form a key element of the eight principles with the Plan outlining that delivering successful and sustainable neighbourhoods means providing for people to have access insofar as possible to the daily services they need by means of walking and cycling. This is promoted in the RSES through the 10-minute settlement concept whereby community facilities and services are accessible within a 10-minute walk or cycle from home or accessible via public transport services connecting people to larger scaled settlements where such services are available.</p> <p>It is considered that the provisions set out collectively in Chapter 5 when taken as a collective under the 8 principles which make up 'The Plan Approach' will ensure that all projects which effect the public realm will ensure that the needs of pedestrian, cyclists and public transport users</p>

		<p>are considered fully, and that transport schemes complement any public realm objectives that apply.</p> <p><b>CE Recommendation:</b></p> <p>Insert a new objective within Policy QDP6 Public Realm to read:</p> <p><i>'To ensure, in cooperation with the NTA and relevant agencies, that projects which affect the public realm will consider fully the needs of pedestrian, cyclists and public transport users, and that transport schemes complement any public realm objectives.'</i></p>
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<b>Short Term Road Programme</b>		
<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation</b>
<p><a href="#">SD-C195-245 National Transport Authority</a></p>	<p>The submission notes the intention to initiate the provision of a grade separated junction at Kennelsfort Road and the R148 in 2022. The submission sets out that the justification for such a large scheme, in terms of sustainability, has not been demonstrated and there is no requirement to address cycle network connectivity and consistency with BusConnects set out in the objective.</p> <p>It also notes that a scheme of this nature would be inconsistent with the Transport Strategy which states that there will be no significant increase in road capacity for private vehicles on radial roads inside the M50 motorway.</p> <p>The submission recommends that this scheme is removed from the Draft Plan as it is a significant investment in increased radial road capacity inside the M50 and does not take into account the requirements of other transport modes and transport projects at this location.</p>	<p><b>CE Response:</b></p> <p>Policy SM3 Objective 17 sets out to work with the NTA and other state agencies to facilitate the delivery of the Kennelsfort Road-R148 grade separated junction or an equivalent solution to maximise the efficacy of the BusConnects Project.</p> <p>Table 7.5 Six Year Road Programme includes the support for the provision of a grade separated junction at Kennelsfort Road and the R148, to be initiated during the first two years of the 2022-2028 Development Plan.</p> <p>While the provisions of Objective 17 aim to work with the NTA on developing such a project the points raised by the Authority are noted.</p> <p>In light of these comments, it is considered that reference to Kennelsfort Road in Table 7.5 under the Six Year Road Programme should be moved and inserted into the Medium to Long Term Road Objectives.</p>

		<p><b>CE Recommendation:</b></p> <p>Amend Table 7.5 to remove reference to 'Kennelsfort Road and the R148' and associated text and insert the same into Table 7.6 Medium to Long Term Road Objectives.</p>
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<b>Sustainable Mobility</b>		
<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation</b>
<p><a href="#">SD-C195-245 National Transport Authority</a></p>	<p>The submission highlights that the issue raised in regard to anti-social behaviour is reiterated in relation to SM2 Objective 4, as the reference to “other unintended consequences” is similarly unclear. The submission also stresses the importance of incorporating the principle of “filtered permeability” whereby links are provided for pedestrians and cyclists but not for motorised traffic.</p> <p>The submission recommends that the reference to anti-social behaviour and other unintended consequences is removed from SM Objective 4. Furthermore, the NTA recommends that a commitment to the provision for filtered permeability is included in the plan.</p>	<p><b>CE Response:</b></p> <p>SM2 Objective 4 seeks <i>“To ensure that connectivity for pedestrians and cyclists is maximised and walking and cycling distances are reduced in existing built-up areas, by removing barriers to movement and providing active travel facilities in order to increase access to local shops, schools, public transport services and other amenities, while also taking account of existing patterns of anti-social behaviour and other unintended consequences of removal of such barriers”</i>.</p> <p>The wording of objective SM2 Objective 4 has been crafted to support the principle of permeability throughout the County in a manner which takes account of existing or potential occurrences for antisocial behaviour <i>and other</i> unintended consequences of removal of such barriers.</p> <p>It is not considered that this in anyway dilutes or results in a weakened commitment from the Council to the provision of connected neighbourhoods or permeability schemes but merely ensures that consideration is given to any potential for anti-social behaviour at an early stage and where such circumstances are found to exist or have the potential to exist, design measures can be developed and incorporated in order to mitigate against the potential for such anti-social behaviour. It is considered that this is</p>

		<p>a practical and pro-active approach to take in achieving permeability and delivering on the commitments in the plan for connected neighbourhoods as South Dublin strives towards the achievement of the 10-minute settlement concept whereby community facilities and services are accessible within a 10-minute walk or cycle from home or accessible via public transport services connecting people to larger scaled settlements where such services are available.</p> <p>It is considered that reference to filtered permeability is implicit in the objective but can be made explicit through a minor amendment and that the words ‘and other unintended consequences of’ be removed.</p> <p><b>CE Recommendation:</b></p> <p>Amend SM2 Objective 4 to read:</p> <p><i>“To ensure that connectivity for pedestrians and cyclists is maximised and walking and cycling distances are reduced in existing built-up areas, by removing barriers to movement and providing active travel facilities in order to increase access to local shops, schools, public transport services and other amenities <b>through filtered permeability</b>, while also taking account of existing patterns of anti-social behaviour <del>and other unintended consequences of</del> <b>in the</b> removal of such barriers”.</i></p>
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<b>Western Orbital Route</b>		
<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation</b>
<a href="#">SD-C195-245 National Transport Authority</a>	The submission welcomes the reference to the role of the Transport Strategy in determining any future requirement there may be for the Western Orbital Route the function of which would be to provide resilience to the M50 in particular between	<p><b>CE Response:</b></p> <p>Section 7.7.2 ‘New Streets and Road Proposals sets out details in regard to the strategic road network. Within this section Table 7.5</p>

	<p>the N7 and N4 which would include provision for sustainable transport modes along its length. It is further stated that any such route would require protection from inappropriate forms of development which may compromise this function and that an extension of this route from the N7 to the N81 would have to be demonstrated against the Transports Strategy's objectives.</p> <p>The submission recommends that the wording for the Western Dublin Orbital Route in table 7.5 be amended to include reference to its primary function in the provision of resilience to the operation of the M50, and that justification for any further extension from the N7 to the N81 would be required against the Transport Strategy's objectives.</p>	<p>outlines a Six Year Road Programme, which is subject to available funding. The Western Orbital Route is identified as having the following function:</p> <p><i>New road from N81 to the Link between the N81, N7 and the N4 with a route Leixlip Interchange by-pass function around Rathcoole and Saggart. The need for this route, further connections and possible alternative routes will be determined through the review of the NTA's GDA Strategy and in consultation with TII and relevant local authorities. In any such route a primary objective of South Dublin County Council shall be to protect the scenic Liffey Valley parklands, and amenities at Lucan Demesne and St Catherine's Park and Lucan Village and no proposals to continue a road over these lands will be considered.</i></p> <p>The points raised by the Authority are noted in regard to the function of this route between the N7 and N4 being to provide resilience to the M50 and the requirements for this route to be protected from inappropriate development which may compromise this function.</p> <p>It is further noted that the extension of this route from the N7 to the N81 would need to be demonstrated against the Transport Strategies objectives.</p> <p>In this regard it is considered reasonable to amend the wording in Table 7.5 in order to make reference to the proposed route and its function between the N7 and N4 and furthermore to include wording in regard to the required justification for any extension to this route from the N7 and N81 in line with the Transport Strategy Objectives.</p> <p><b>CE Recommendation:</b></p> <p>Amend Table 7.5 and the Description and function of the Western Orbital Route as follows:</p> <p>From:</p>
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		<p>Description: New Road from N81 to the Leixlip Interchange</p> <p>Function: New Road from N81 to the Link between the N81, N7 and the N4 with a route Leixlip Interchange by-pass function around Rathcoole and Saggart. The need for this route, further connections and possible alternative routes will be determined through the review of the NTA's GDA Strategy and in consultation with TII and relevant local authorities. In any such route a primary objective of South Dublin County Council shall be to protect the scenic Liffey Valley parklands, and amenities at Lucan Demesne and St Catherine's Park and Lucan Village and no proposals to continue a road over these lands will be considered.</p> <p>To:</p> <p>Description - New road from the N7 to the N4 with a potential extension to the N81.</p> <p>Function:</p> <p>New Road to link between the N7 and the N4 Leixlip Interchange with a route by-pass function around Rathcoole and Saggart and the potential for a further extension of this route from the N7 to the N81. <b>The function of this route would be to provide resilience to the M50</b>, in particular between the N7 and N4 and further connections and possible alternative routes will be determined through the review of the NTA's GDA Strategy and in consultation with TII and relevant local authorities.</p> <p>In any such route a primary objective of South Dublin County Council shall be to protect <b>environmentally sensitive areas</b> including the scenic Liffey Valley parklands, and amenities at Lucan Demesne and St Catherine's Park and Lucan Village and no proposals to continue a road over these lands will be considered.</p>
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## **Part 3 Chief Executives Response and Recommendation to Issues Raised**

## **Chapter 1:**

# **Introduction, Strategic Vision and Climate Action**

## Chapter 1 Introduction, Strategic Vision and Climate Action

Statutory Context		
Submission No.	Submission Summary	CE response and recommendation
SD-C195-133 CAIRN Plc	<p>The submission notes that there are a considerable number of 'objectives' in the Plan and that there is an inferred obligation in the Act that the planning authority will put into effect the objectives. The submission refers to a high court judgement – Glencar Explorations v Mayo County Council [1992] 2 I.R. 237 – which held that objectives must be positive. While it is acknowledged in the submission that the concept of an 'objective' is a broad one, it is submitted that specifying text as an 'objective' means that there is no flexibility in the application of objective, as planning authority may not materially contravene an objective of the plan, without engaging in material contravention procedures. This is considered to present very significant risks of judicial review of decisions which do not go through the material contravention procedure and that this consideration also applies to the Council's own developments. In this regard, it is submitted that many of the objectives in the Plan would be more appropriately identified as development management standards or guidelines.</p>	<p><b>CE Response:</b></p> <p>The content of the submission is noted. In accordance with the provisions of section 10 of the Planning and Development Act 2000 (as amended) a development Plan shall set out an overall strategy for the proper planning and sustainable development of the area of the development plan and shall consist of a written statement and plan or plans indicating the development objectives for the area in question.</p> <p>The Act continues by setting out the areas in which the plan shall include objectives for. The Draft South Dublin County Development Plan has been carried out in accordance with the provisions of the Act in this regard.</p> <p><b>CE Recommendation:</b></p> <p>No change to plan</p>

Preparation of the South Dublin County Development Plan		
Submission No.	Submission Summary	CE response and recommendation

<p>SD-C195-109 South Dublin Conservation Society</p>	<p>The submission highlights that the Draft Plan is extremely large in size and is double the size of the existing plan. Due to the public submission period coinciding with peak summer holidays a longer consultation period should have been considered.</p>	<p><b>CE Response:</b></p> <p>The content of the submission is noted. The consultation period was carried out in accordance with Section 12 of the Planning and Development Act, 2000 (as amended). Observations or submissions regarding the Draft Development Plan and/or Environmental Report and/or Appropriate Assessment were invited from members of the public and other interested parties during the period Wednesday 7th July and Wednesday 15th September 2021 inclusive in accordance with such legislative requirements.</p> <p><b>CE Recommendation:</b></p> <p>No change to plan</p>
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<p><b>Vision Context</b></p>		
<p><b>Submission No.</b></p>	<p><b>Submission Summary</b></p>	<p><b>CE response and recommendation</b></p>
<p>SD-C195-109 South Dublin Conservation Society</p>	<p>The submission welcomes the increased focus on the retention, conservation and promotion of biodiversity, natural and built heritage and climate change mitigation throughout the Plan. It supports many of the policies and objectives in support of this, including the Green Infrastructure Strategy.</p> <p>A submission has expressed concern over the design choice of the cover of the Draft Plan and that it is not reflective of the true importance of a land use framework document but more suitable for a tourism strategy document.</p> <p>A submission has highlighted that the Strategic Vision Statement is very limited as a vision statement and does not reflect the ethos of the overall land use framework</p>	<p>The content of the submission is noted and responded to under a number of headings as follows:</p> <p><u>Plan Cover and Design:</u></p> <p>In regard to the design choice of the Plan cover the concerns raised are noted however the branding/ logo and tagline for the plan has been developed over three stages Shape Explore Experience. Stage 1 the shaping stage involved inviting submissions from the general public and stakeholders to inform the development stage of the plan, Stage 2 the Explore stage (and current stage) where the public and stakeholders were requested to explore the Draft Plan and make submissions while Stage 3 is the Experience Stage when the plan is adopted, and we begin to 'Experience' the implementation of the plan's objectives over the period 2022-2028. The cover at this stage is considered to be suitable for the 'Explore' stage of the plan using the image of the Round Tower in Clondalkin</p>

	<p>document and makes reference to strategic wording of Westmeath County Councils Development Plan 2021-2027.</p> <p>The submission further highlights that the two-year review of the Development Plan should identify any negative impacts and take appropriate remedial action.</p> <p>The submission considers that the recommendation and key issues of the EPA Report 'State of the Environment Report Ireland's Environment -An Integrated Assessment 2020' should be considered in the Development Plan.</p>	<p>and the symbolic view from the tower windows looking across over the County to create a sense of exploration.</p> <p><u>Strategic Vision:</u></p> <p>The Strategic Vision has been developed in line with International, National and Regional policy provisions. The vision also reflects the South Dublin County Council Corporate Plan mission to 'make our county a vibrant and inclusive place for the people who live, visit, work and do business here, now and in the future' Section 1.7 supplements the strategic vision outlining the layered approach of the plan to development with a focus on facilitating future growth in a manner which protects and enhances the County's natural, cultural and built heritage, maximises opportunities for the development of the Green Infrastructure network, promotes the highest quality in urban design with the overall aim of delivering healthy places in which to live, work, visit, socialise, and invest in. . It is considered that the vision, augmented with the Plan's layered approach, is pitched at the correct level for a land use framework document.</p> <p><u>Two Year Review:</u></p> <p>The two-year review/Progress Report sets out to review and provide an update on the status of securing key policies and objectives of the Plan. This carried out under Section 15(2) of the Planning and Development Act. Where objectives are not being achieved or have the potential to impact negatively on the receiving environment remedial action can be taken through a variation to the Plan. However, it should be noted that the policies and objectives set out in the plan have been crafted in a manner to impact positively on the receiving environment and people of the South Dublin in order to delivery the Strategic vision for the County.</p> <p><u>EPA Report 2020:</u></p> <p>The EPA produces state of the environment reports on a four-yearly cycle. These reports provide timely information and knowledge to</p>
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		<p>the public, policymakers and key economic sectors in support of action to protect and manage the environment. Ireland's Environment – An Integrated Assessment 2020 is the most recent state of the environment report published by the EPA.</p> <p>The overall assessment from this report is noted where it is identified that, while there is a need for urgent approaches to address climate change and biodiversity decline there are other environmental priorities for the country including tackling air and water pollution, investing in water services, improving recycling rates and improving air quality. It is considered that the provisions of the plan reflect and aim to positively contribute towards addressing such issues within the County.</p>
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### Strategic Vision

Submission No.	Submission Summary	CE response and recommendation
SD-C195-205 Land Development Agency	The submission notes the favourable alignment of the Council's strategic vision and supportive set of policies and objectives with the Land Development Agency's (LDA) remit to deliver significant housing growth, enable an affordable housing sector in Ireland and realise compact growth, which promotes a modal shift towards healthy, active, and sustainable mobility.	<p><b>CE Response:</b></p> <p>The content of the submission is noted and welcomed.</p> <p><b>CE Recommendation:</b></p> <p>No change to plan</p>

### Climate Action

Submission No.	Submission Summary	CE response and recommendation
SD-C195-281 Dublin Friends of the Earth	The submission is concerned with the reduction of carbon emissions in line with the Paris Agreement and the recent Climate Act, in the context of development in SDCC. The	<p><b>CE Response:</b></p> <p>The content of the submission is noted. The Plan through its role in setting out the strategic spatial framework for the future development of the County, supports wider local and central</p>

	<p>following is suggested to be included in the County Development Plan:</p> <ul style="list-style-type: none"> <li>&gt; Rapid phasing out of fossil fuels;</li> <li>&gt; Data Centre's should be powered by onsite renewable technology, with heat recovery systems enabled where technology is made available;</li> <li>&gt; Improved communications policy between Dublin CARO office, Codema and the Environment/Climate Change section of SDCC with the public;</li> <li>&gt; Development of sustainable energy communities and climate action plans for businesses, schools and healthcare settings.</li> </ul>	<p>government actions in addressing maximum co-ordination between the County Development Plan, the South Dublin Climate Change Action Plan and other climate related policies and programmes.</p> <p>Such provisions are set out at a high level in Section 1.9 of the Draft Plan. To ensure these provisions have been implemented successfully throughout the plan specific climate positive objectives have been highlighted throughout each chapter. Each Chapter also includes a Climate Action Audit which provides an overview of the potential sources of greenhouse gas emissions alongside measures implemented to address such potential climate impacts.</p> <p>Specific policy provisions for space extensive enterprise, of which data centres are one, is contained within Chapter 9.</p> <p>The preparation of the Draft Plan involved consultation with Codema and CARO as well as internal consultation with the Council's climate change team. This is reflected in policies and objectives in the Draft Plan which has been out on public consultation. It is considered that any further communications policy is not a matter for the Draft Plan.</p> <p><b>CE Recommendation:</b></p> <p>No change to plan</p>
<p><a href="#">SD-C195-213 An Taisce</a></p>	<p>The An Taisce submission recommends that all climate mitigation provisions in the new CDP be assessed against Ireland's fairshare emissions reduction commitments in line with the Paris Agreement and the need to limit warming to 1.5C over pre-industrial levels. Similarly, the new Plan should ensure that development decisions are also assessed against these commitments. Both the policies and the zoning in the new CDP should take account of up-to-date climate projections. This is of particular importance with regard to increased fluvial and pluvial flood risk in the County. It notes</p>	<p><b>CE Response:</b></p> <p>The content of the submission is noted. The Plan through its role in setting out the strategic spatial framework for the future development of the County, supports wider local and central government actions in addressing maximum co-ordination between the County Development Plan, the South Dublin Climate Change Action Plan and other climate related policies and programmes.</p> <p>Such provisions are set out at a high level in Section 1.9 of the Draft Plan and to ensure these provisions have been implemented successfully throughout the plan specific climate positive objectives</p>

	<p>also that new development proposals should also be required to demonstrate consideration of this.</p> <p>In addition the submission supports the objectives of the Plan which supports the just transition to a climate aware society imperative that workers and other stakeholders impacted by these changes are provided with the appropriate resources, compensation and training. A Just Transition model is needed to plan and deliver a package of complementary interventions to deliver this objective. The submission notes that the commitments in the Plan are relatively vague and would benefit significantly from greater detail on what the Council considers to be the principles of a Just Transition and how development decisions in the county will be made in accordance with same.</p>	<p>have been highlighted throughout each chapter. Each Chapter also includes a Climate Action Audit which provides an overview of the potential sources of greenhouse gas emissions alongside measures implemented to address such potential climate impacts.</p> <p>The Development Plan has also been assessed against its impact on the receiving environment through the SEA and AA processes and has been subject to a strategic flood risk assessment taking account of the most up to date flood risk information available and taking a precautionary approach to climate change.</p> <p>The submission raises a further point in regard to the provision of a just transition model and question what the Council consider to be the principles of a just transition and how decisions in the County will be made in accordance with same. In this regard it should be noted that the plan is a land use plan which sits within the national and regional context with the South Dublin Climate Action plan 2019 -2024 setting out how the Council will improve energy efficiency and reduce greenhouse gas emissions in its own buildings and operations, while making South Dublin a more climate resilient region with engaged and informed citizens. The County Development Plan has applied a layered approach which aims to facilitate a holistic approach to Climate Action under the themes of Compact Growth, Efficient Use of Land, Environmental Protection, Green Connections, Quality Design and Healthy Placemaking, Active Travel, Connected Neighbourhoods and Energy Efficiencies.</p> <p>While the Draft Plan incorporates climate action as an overarching theme and seeks to facilitate a just transition through appropriate land use and ensuring sufficient land is zoned in the right place to facilitate projected population and job growth, details of a Just Transition model are outside the remit of a County Development Plan.</p> <p><b>CE Recommendation:</b></p>
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		No change to plan
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Climate Action and the Role of the Development Plan		
Submission No.	Submission Summary	CE response and recommendation
SD-C195-119 People Before Profit	While the emphasis on reduction of greenhouse gas emissions and a carbon neutral society by 2050 is welcomed in the submission, it is considered that the Draft Plan does not go far enough.	<p>The content of the submission is noted. The Plan through its role in setting out the strategic spatial framework for the future development of the County, supports wider local and central government actions in addressing maximum co-ordination between the County Development Plan, the South Dublin Climate Change Action Plan and other climate related policies and programmes.</p> <p>Such provisions are set out at a high level in Section 1.9 of the Draft Plan. To ensure these provisions have been implemented successfully throughout the plan specific climate positive objectives have been highlighted throughout each chapter. Each Chapter also includes a Climate Action Audit which provides an overview of the potential sources of greenhouse gas emissions alongside measures implemented to address such potential climate impacts.</p> <p>Chapter 10 Energy sets out how the actions of the South Dublin Climate Action plan 2019 -2024 will continue to improve energy efficiency and reduce greenhouse gas emissions in its own buildings and operations, while making South Dublin a more climate resilient region with engaged and informed citizens.</p> <p>The County Development Plan has applied a layered approach which aims to facilitate a holistic approach to Climate Action under the themes of Compact Growth, Efficient Use of Land, Environmental Protection, Green Connections, Quality Design and</p>

		<p>Healthy Placemaking, Active Travel, Connected Neighbourhoods and Energy Efficiencies.</p> <p>It is considered that the Development Plan is consistent with the current Climate Action Plan for South Dublin and to climate change policy at a national and regional level and under the provisions of CA1 Objective 3 will continue to implement subsequent measures identified in any superseding climate action plans.</p> <p><i>CA1 Objective 3 'To implement the South Dublin County Council Climate Change Action Plan 2019 - 2024 (SDCC CCAP) or superseding plans and to facilitate a just transition to a climate resilient low carbon County. (consistent with SO8 of the NPF, RPO 7.32, 7.33 of the RSES)' will.</i></p>
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Chapter 1 Miscellaneous		
Submission No.	Submission Summary	CE response and recommendation
SD-C195-213 An Taisce	An An Taisce notes its key objectives in making the submission to the CDP. These include ensuring that the climate and biodiversity loss emergencies are addressed, ensuring EU, national, regional and local policy and guidelines are implemented. Reducing GHG emissions in line with national targets, promoting compact development served by public transport, supporting a rapid shift toward walking and cycling, protecting habitats and biodiversity including Natura sites, protecting water bodies and water quality, prevention of inappropriate development, conserve the quality of the Irish landscape including archaeological monument, built heritage and protected structures, promoting efficient investment in public transport and promoting local self reliance, public health and quality of life.	<p>The content of the submission is noted. The 'layered' format of the Plan aims to facilitate a holistic approach to ensuring Climate Action is at the forefront of all future development within the County, with policies and objectives in each chapter crafted in a manner which contributes significantly towards addressing climate change and reducing the County's carbon emissions in a meaningful and tangible way. These overarching climate action principles align closely with the key action areas of the South Dublin Climate Action Plan 2019-2024, namely Energy and Buildings, Transport, Flood Resilience and Resource Management.</p> <p>This is reflected in policy and objectives contained throughout the plan, including compact growth set out in Chapter 2, protection of the built and natural environment in Chapter 3, a Green Infrastructure Strategy for the County in Chapter 4, healthy placemaking in Chapter 5, sustainable transport with modal targets in Chapter 7, multi-functional open space policy in Chapter 8</p>

		<p>incorporating surface water management, significant policy on renewable energy in Chapter 10 and flood risk and surface water management in Chapter 11.</p> <p>It is considered that climate action has been comprehensively addressed throughout the Draft Plan including audits at the end of each chapter to indicate how policy has addressed sources of GHG emission.</p> <p><b>Recommendation</b></p> <p>No change to the Draft Plan</p>
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# **Chapter 2:**

## **Core Strategy and Settlement Strategy**

## Chapter 2: Core Strategy and Settlement Strategy

Statutory and Strategic Context		
Submission No.	Submission Summary	CE response and recommendation
SD-C195-54 Transport Infrastructure Ireland	<p>TII underlines that the strategic national road network is critical to supporting and enhancing regional economic growth and providing regional accessibility and enhanced accessibility to international gateways.</p> <p>It is requested by the submission that new text be provided to reflect National Development Plan investment objectives in accordance with the provisions of policies of the NPF, NDP and Section 28 Ministerial Guidelines; ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012). It is noted that currently the Core Strategy does not acknowledge the referenced Section 28 Guidelines.</p>	<p><b>CE Response:</b></p> <p>The issue raised is noted. The Draft Plan recognises that the National Planning Framework (NPF) is centered around ten National Strategic Outcomes (NSOs) which are supported by ten Strategic Investment Priorities under the National Development Plan. This is illustrated in Figure 1, page 31 of the Draft Pan.</p> <p>The submission indicates that the Core Strategy does not acknowledge the referenced Section 28 Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ (DoECLG, 2012). However, the Draft Plan specifically highlights under Section 2.4 ‘Strategic Context’ the parameters within which the Planning Authority framed the Core Strategy which are defined within National and Regional planning policy frameworks and comprised of the following:</p> <ul style="list-style-type: none"> <li>• Project Ireland 2040: National Planning Framework;</li> <li>• The Eastern and Midlands Regional Spatial and Economic Strategy 2019-2031, including the Dublin Metropolitan Area Strategic Plan, and</li> <li>• Section 28 Ministerial Guidelines including Specific Planning Policy Requirements outlined under Section 28(1) of The Act.</li> </ul> <p>Furthermore, Appendix 1 of the Draft Plan details a full Statement of Compliance with Section 28 Guidelines whereby the compliance with ‘Spatial Planning and National Roads: Guidelines for Local Authorities (2013)’ is also demonstrated. Reference to these guidelines is also set out in the Sustainable Movement chapter.</p>

		<p>It is considered that the Draft Plan is in line with national and regional policy provisions and demonstrates the same.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
SD-C195-234 Development Applications Unit	<p>The submission from the DHLGH acknowledges that compact development is at core of the Draft Plan and indicates that from nature conservation point of view this is very important to limit the displacement of flora and fauna.</p> <p>The submission welcomes that sufficient land is already appropriately zoned to cater for future growth and that this reinforces the significance of the Core strategy for the conservation of biodiversity, as it will restrict any encroachment on the rural parts of the county which are biologically rich in species.</p>	<p><b>CE Response:</b></p> <p>The recognition within the submission that the focus on compact development set out in the core strategy is significant for the conservation of biodiversity, as it will limit the displacement of fauna and fauna is welcomed and acknowledged.</p> <p><b>CE Recommendation</b></p> <p>No change to Draft Plan</p>

Settlement Strategy		
Submission No.	Submission Summary	CE response and recommendation
SD-C195-11 Proinsias Mac Fhlannchadha  SD-C195-11 Proinsias Mac Fhlannchadha	<p>The submission is disappointed that the draft plan does not propose to rezone or zone new lands over and above those currently set out under the current 2016 County Development Plan and subsequently not delivered over the course of the previous plan and does not intend to de-zone residential lands in under-serviced areas such as Stocking Lane, Knocklyon where there is an evident lack of infrastructure in schools/ roads and transport to deal with with any increase in population.</p> <p>The submission notes that the Office of the Planning Regulator in their submission stated that a significant</p>	<p><b>CE Response:</b></p> <p>The issues raised are noted. It is recognised that South Dublin County has a physical excess of zoned lands to meet the population and housing targets set out under national and regional policy. These lands are located, for the most part, within existing built-up areas in Dublin City and Suburbs and will, therefore, support compact growth and in support of the compact growth agenda, the Development Plan has placed a significant emphasis on deliverability, monitoring, growth, and active land management.</p> <p>Furthermore, while it notes that some lands may be zoned in previous development plans and not developed, the Planning</p>

	<p>proportion of the county's future population growth will need to be directed to:</p> <ol style="list-style-type: none"> <li>1. Naas Road / Ballymount Strategic Development Area, which has potential for residential development and more intensive employment / mixed use;</li> <li>2. South western corridor (western suburbs) – SDZ lands and Kilcarbery; and</li> <li>3. South western corridor (LUAS red line) – Tallaght Town Centre / Cookstown and Fortunestown / Saggart / CitywestSouthwestern corridor (LUAS red line) – Tallaght Town Centre / Cookstown and Fortunestown / Saggart / Citywest.</li> </ol> <p>In this regard, it is submitted that SDCC should look to include the lands around Clondalkin Industrial estate as part of (1) in order to make use of the existing infrastructure (rail) to promote sustainable movement within SDCC in line with SM1 Objective 4 and SM1 Objective 5.</p> <p>The submission calls for SDCC to revise their standpoint on not rezoning/ zoning additional lands/ de-zoning unsuitable lands as part of this Development Plan.</p>	<p>Department have carried out an extensive analysis of the same and found that the majority of lands to which this applies relate to Adamstown and Clonburris SDZs which are strategic long-term lands identified in the RSES and to other, lands including Fortunestown and Kilcarbery, and for which development is now progressing. Furthermore, it should be noted that other submissions made to this Draft Plan have noted they can deliver housing in such locations and have highlighted the potential exceed targets. Other smaller parcels of land which have been zoned for long periods of time and not developed are generally in existing urban areas and it would not be appropriate to rezone them.</p> <p>Therefore, having regard to the context set out above it is considered that development will occur in a sustainable manner over the lifetime of the Plan. Furthermore, it is noted that in the submission made by the Office of the Planning Regulator (OPR), the Office notes how the core strategy has attempted to strike a balance between having an excess of zoned land and being able to deliver new development and they welcome the inclusion of policies and objectives for the monitoring and delivery of the same.</p> <p>With regard to the inclusion of lands around Clondalkin Industrial Estate, while it is recognised that this is located along the rail line, it is considered inappropriate to rezone the lands as requested given the existing quantum of Regen lands and the surplus capacity of zoned residential land in the County.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
<p><a href="#">SD-C195-64 Saggart Village Residents' Association</a></p>	<p>The submissions raise concerns regarding the reference in Chapter 2 to Saggart/Citywest which states “The new district at Fortunestown near the emerging town of Saggart/Citywest is identified for residential growth”. It is considered that</p>	<p><b>CE Response:</b></p> <p>Saggart is defined within Table 13: RSES Settlement Hierarchy relating to South Dublin County Council of the Draft Plan as a ‘Self-Sustaining Town’. This is defined by the Eastern Midlands</p>

<p>SD-C195-251 Cllr Trevor Gilligan PC</p>	<p>Saggart should be actively supported to remain a “village”, to be protected as a village and not to be referenced in the plan as a town of Saggart/Citywest.</p>	<p>Regional Spatial and Economic Strategy (RSES) as “Self-Sustaining Towns with high levels of population growth and a weak employment base which are reliant on other areas for employment and/or services and which require targeted ‘catch up’ investment to become more self-sustaining.”</p> <p>Saggarts position in the settlement hierarchy reflects its significant growth in the last twenty years and its integral connection to the growing Citywest/ Fortunestown area to the east. Moreover, the RSES specifically highlights Saggart/Citywest on pages 104 and 105 as “emerging towns”. Therefore, it is considered that the designation of the ‘Self Sustaining Town’ is appropriate and consistent with the RSES settlement hierarchy. While Saggart and Citywest can be viewed as being separate entities, both areas have experienced significant growth requiring supporting physical and social infrastructure. Therefore, it is evident that Saggart is decoupled from areas such a Citywest and Fortunestown.</p> <p>It should also be noted that revisions have been made to the housing target of Saggart on foot of the level of development and activity likely on lands to North along Mill Road over the plan period. As a result, Saggart is provided with upward revision to the housing target in Table 10: Core Strategy from 96 units to 165 units over the 6-year lifetime of the plan i.e.,2022-2028. The response to the OPR dealing with this change is set out separately at the beginning of this report for further details.</p> <p>Furthermore, particular reference is made to Policy CS8: Saggart and associated objectives which seek specifically to support the sustainable long-term growth of Saggart by focusing growth within and contiguous to the village core. In addition, it is noted that the village core of Saggart is zoned ‘Village Center’. In this regard, the Draft Plan provides for a number of provisions for the protection and development of village centers. Of particular note is QDP3 Objective 3; EDE8 Objective 5; and Policy EDE13: Retail - Village</p>
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		<p>Centres. It therefore considered that the village core of Saggart is satisfactorily protected under the provisions of the Draft Plan.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan - See recommended changes outlined in the response to the OPR submission at the beginning of this report (SD-195-227) and Appendix 1 with regard to Saggart.</p>
<p>SD-C195-64 Saggart Village Residents' Association</p> <p>SD-C195-251 Cllr Trevor Gilligan PC</p>	<p>The submissions welcome CS8 Objective 2 and request support from SDCC to have put to use a vacant site in a prime location along the main street.</p>	<p><b>CE Response:</b></p> <p>The support for the inclusion of CS8 Objective 2 in the Draft Plan is noted and welcomed. The Draft Plan recognizes that active land management is key to realising the vision and objectives of the Core Strategy, in particular Policy CS4: Active Land Management.</p> <p>South Dublin County Council is committed to identifying and prioritising the development of vacant and underutilised sites in the County for housing and regeneration purposes. In line with Housing for All, and having regard to any forthcoming legislation which may expand the relevant land tax, the Planning Authority is committed to undertaking a review of vacant sites in the County.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<p>SD-C195-58 Declan Brassil &amp; Co. Ltd.</p>	<p>The submission relates to a significant landholding comprising of c.62 hectares located in the vicinity of Hazelhatch rail station.</p> <p>The submission proposes the following amendments to Chapter 2 (Core Strategy and Settlement Strategy):</p> <p>Proposed Amendment No 1: Include the following text under section 2.6.1 heading 'Strategic Long Term Development Areas (SDAs)': "<i>The strategic potential and opportunity presented by lands in the vicinity of Haze/hatch rail station</i></p>	<p><b>CE Response:</b></p> <p>The subject lands are zoned RU Rural, in the Draft Plan and lie in the vicinity of Hazelhatch rail station in County Kildare. The Core Strategy and Settlement Strategy in Chapter 2 sets out population and housing figures which must be consistent with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) as required under the Planning and Development Act 2000 (As Amended) and also confirms that the County has enough land for a further 10,470 units (79%) above the net household need and therefore there is no need to re-zone</p>

	<p><i>over future plan periods is also acknowledged. These lands have the potential to accommodate sustainable rail-based employment and residential development over future plan periods, integrating high-capacity transportation and land use that supports, complements and integrates the plan led growth of Grange Castle and Ce/bridge. The Council will proactively engage with the Regional Authority to ensure that the opportunity and potential of these lands is appropriately provided for in the Regional Settlement and Economic Strategy, and the Metropolitan Area Strategic Plan."</i></p> <p>Proposed Amendment No. 2 proposes the inclusion of a Core Strategy Objective to support Proposed Amendment No. 1. New CS1 Objective 4: "<i>To proactively engage with the Regional Authority to ensure that the opportunity and potential presented by lands in the vicinity of Haze/hatch rail station to facilitate the plan-led and integrated growth of Grange Castle and Ce/bridge is appropriately provided for in the Regional Settlement and Economic Strategy, and the Metropolitan Area Strategic Plan.</i>"</p> <p>The submission sets out a number of reasons justifying their request:</p> <ul style="list-style-type: none"> <li>• Strategic location and context of Hazelhatch rail station with respect to the subject lands;</li> <li>• Proposals are in accordance with national, regional, local policies and objectives and Section 28 Guidance;</li> <li>• Proposals area clearly established in submission of the Department of Environment, Community and Local Government submission on the Celbridge LAP, dated 3 February 2017;</li> <li>• Proposal is consistent with the principles of active land management and proper planning and sustainable development, as set out in the Core Strategy of the Draft Plan and particularly CS3 Objective 4; and</li> </ul>	<p>additional lands or zone new additional lands over and above those currently set out under the current 2016 County Development Plan. Having regard to above figures set out in the Core Strategy and the current excess of zoned land, without the need for further zoning, it is considered that there is sufficient flexibility to meet the household requirements for 2031 and potentially up to 2040. The revised target figures in response to the OPR recommendations, set out separately under the response to the OPR, do not impact on the excess land capacity available to meet the revised targets. Therefore, to re-zone or zone new additional lands over and above those currently set out in the Draft Plan would be contrary to National and Regional planning policy.</p> <p>In this context, the designation of the subject lands as a Strategic Long Term Development Area would undermine the delivery of households within strategic residential growth sites identified within the Regional Metropolitan Area Strategic Plan at: Adamstown, Clonburris, Tallaght, Naas Road and Fortunestown which would be contrary to National and Regional Planning Policy. Therefore, to zone new additional development lands or designate further long term strategic lands over and above those currently set out in the Draft Plan would be contrary to National and Regional planning policy.</p> <p>The Land Capacity Audit, which informs the Core Strategy, comprised a comprehensive review and analysis to calculate the potential yield of undeveloped land (RES, RES-N, TC, REGEN, VC, DC, LC and SDZ) zoned in the 2016 - 2022 County Development Plan. Within this total capacity, approximately 150 ha of Long-Term Strategic lands providing for more than 7,500 units have been identified as being deliverable over the Development Plan period and are included in the land capacity figures. Those same long term strategic lands will provide for further capacity in future Development plans.</p>
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	<ul style="list-style-type: none"> <li>• Subject lands fall within an easy 10-minute walking distance of Hazelhatch rail station whereby an appropriate mix and density of uses can be dictated based on the proximity and easy access to Hazelhatch train station; and</li> <li>• Will support and complement the plan led growth of Grange Castle and Celbridge in an integrated manner.</li> </ul> <p>As such, it is requested that the Council is requested to proactively engage with the Regional Authority to ensure that the opportunity and potential of these lands is appropriately provided for in the Regional Settlement and Economic Strategy, and the Metropolitan Area Strategic Plan.</p> <p>The degree of flexibility provided for in the Core Strategy is welcomed. However, it is considered that this flexibility requires continued and close monitoring of housing delivery and that the designation of Hazelhatch lands as a Strategic Long Term Development Area would further enhance flexibility.</p>	<p>In addition, a thorough Infrastructure Assessment and Social Infrastructure Audit was carried out that built on the initial Land Capacity Analysis. This assessment gathered pertinent data on identified lands in relation to their infrastructural constraints and requirements in order to differentiate between zoned land that is available for development and zoned land that requires significant further investment in services and infrastructure in order for development to be realised. This identifies the assets in each settlement and opportunities to ensure further growth is provided for in tandem with social and physical infrastructure.</p> <p>As noted above, South Dublin County has a excess of zoned lands to meet the population and housing targets set out under national and regional policy. These lands are located, for the most part, within existing built-up areas in Dublin City and Suburbs and will, therefore, support compact growth. In supporting the compact growth agenda, the Development Plan has placed a significant emphasis on deliverability, monitoring, growth, and active land management. In this regard, the Draft Plan acknowledges the need for the delivery of a compact growth agenda and includes a range of measures which promote development.</p> <p>It is also noted that the subject lands are located in close proximity to Celbridge which has seen and will continue to see considerable growth adjacent to the western extremity of South Dublin's lands, on the border with Kildare. The extent of this population and physical growth will take time for new and existing communities to grow and embed. Providing for further extensive growth would not be appropriate and would have to be considered in the future in light of options for compact growth. Given the border location with Kildare County Council (KCC) and in recognising the increasing coalescence of settlement and economic development between KCC and South Dublin County Council (SDCC), GI1 Objective 6 of the Draft Plan seeks to collaborate with KCC to identify a common approach to a</p>
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		<p>greenbelt/green space between the growing settlements within the lifetime of the Development Plan.</p> <p>Furthermore, as part of the County Development Plan and SEA process 2022-2028, an initial Strategic Flood Risk Assessment (SFRA) to inform the Draft Plan was carried out for the County. The SFRA outlines how development can be adequately managed. The area in which the subject lands are located is identified as 'Undeveloped Lands at risk of flooding'. Additionally, the Eastern CFRAM study mapping identifies the area as having a potential risk. The foregoing provides an evidence base on flood risk in the County. The studies identify part of the subject lands as being in flood risk zone A, with 'a high probability of flooding' and flood risk zone B, with 'a moderate probability of flooding'.</p> <p>The Guidelines for Planning Authorities on Flood Risk Management were published by the OPW and DECLG in 2009. The Flood Risk Management Guidelines advises in relation to Flood Zone A that 'most types of development would be considered inappropriate in this zone' and that 'development in this zone should be avoided and/or considered only in exceptional circumstances'. These 'exceptional circumstances' require all parts of a Development Plan justification test to be met 'on a solid evidence basis'. Similarly, in Flood Zone B it advises that highly vulnerable development, such as dwelling houses 'would generally be considered inappropriate in this zone, unless the requirements of the Justification Test can be met'. However, in accordance with the sequential approach, it is recommended by the SFRA to avoid lands in the vicinity of Hazelhatch. Given the identification of Flood Risk Zone A and B on the subject lands in question and the findings of the SFRA, it is considered to allocate these lands as a Strategic Long Term Development Area would be inappropriate.</p> <p>Having regard to the context set out above, it is therefore considered that a strong evidence-based approach has been put forward in the Draft Plan as well as providing for an appropriate</p>
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		<p>balance between monitoring and promoting the deliverability of the development of lands zoned within the County within the lifetime of the Plan. To designate the subject lands through the Draft Plan as a Strategic Long Term Development Area or by other mechanism would undermine the provisions of the Draft Plan with regard to compact growth and development of the county and be at variance with National and Regional policies and objectives.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan</p>
<p>SD-C195-113 CAIRN Plc</p> <p>SD-C195-133 CAIRN Plc</p>	<p>To order to ensure that the delivery of dwellings and associated social and retail provision can occur in tandem, the submission seeks that a review of the Planning Scheme for Clonburris is facilitated and that a new objective be included in the adopted County Plan as follows:</p> <p>CS7 Objective 5 To undertake a review of the Clonburris Planning Scheme 2019 within the lifetime of the County Plan so as to ensure the Planning Scheme can adapt to the timely delivery of dwellings and associated social and retail provision.</p>	<p><b>CE Response:</b></p> <p>The issue raised in the submission is noted.</p> <p>Lands at Clonburris have an approved SDZ Planning Scheme (May 2019). In this regard the Draft Plan aims to actively promote the delivery of sufficient social and physical infrastructure, in tandem with future development of the SDZ. It is noted that the Council, working the other landowners within the SDZ, is progressing a URDF funding application and as of March 2021 has secured approval for the first stage (SAR). This funding would be used to provide infrastructure to facilitate early development during the lifetime of the Development Plan. The funding is to deliver the huge quantum of infrastructure required to unlock the delivery of over 8,700 homes in Clonburris over the next 10 years</p> <p>In addition, there are a number of policies and objectives contained in the Draft Plan that are considered satisfactory for the monitoring and development of Clonburris and as such would negate the need for a specific policy to review the planning scheme. Of particular note are the following:</p> <p>CS7 Objective 4: <i>To promote and facilitate development at the Strategic Development Zones at Adamstown and Clonburris, in accordance with their planning scheme and associated phasing</i></p>

		<p><i>requirements, whilst adapting to and facilitating emerging transport service level pattern needs.</i></p> <p>Policy QDP15: Strategic Development Zones (SDZS): <i>'Continue to implement the approved Planning Schemes for Adamstown and Clonburris SDZs'.</i></p> <p>QDP15 Objective 1: <i>'To support the delivery of the identified infrastructure to facilitate sustainable development in South Dublin's Strategic Development Zones.'</i></p> <p>EDE12 Objective 3: <i>'To support and facilitate the development of new District Centres of an appropriate urban scale at Adamstown and Clonburris in accordance with approved Planning Schemes which should provide a sustainable retail mix including department stores and shopping centres that facilitates walking, cycling and use of public transport and reduces car journeys outside the SDZ for many retail needs.'</i></p> <p>Furthermore, the Draft Plan places great emphasis on the monitoring and delivery of housing units in tandem with physical and social infrastructure. In this respect, where it is found that delivery rates are exceeding the allocation for a particular neighbourhood area the plan provides flexibility under policy CS3 Objective 3 whereby the Council will consider the re-distribution of housing population figures within the neighbourhood areas where the applicant must demonstrate to the Planning Authority that the proposal is aligned with the overall growth target for the County, with any necessary investment in infrastructure and with the provision of employment together with supporting amenities and services.</p> <p>It noted that recommendations have been made that specifically relate to CS Objective 3 and as a result the objective has been strengthened further by including a reference to ensuring the totality of planning population/housing growth is aligned with the overall growth target for the County and that such development is</p>
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		<p>aligned with investment in infrastructure and the provision of employment together with supporting amenities and services. See recommended changes outlined in the response to the OPR submission at the beginning of this report (SD-195-227) with regard to CS3 Objective 3.</p> <p>The Council will monitor the delivery of housing units to ensure general compliance with the Core Strategy and housing supply targets for the County and to inform the redistribution potential outlined above. The process for amendments to Strategic Development Zones (SDZs) is one which lies outside the Development Plan process. The policy and objectives in the Draft Plan will not in any way prevent consideration of an amendment should that be considered necessary by the Planning Authority. The proposed objective is neither appropriate nor necessary.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<p><a href="#">SD-C195-237 Caitriona McClean</a></p>	<p>The submission notes that there is no attempt to match the demand demographic in terms of household size with the SHD permissions granted and ask SDCC to look at the waiting lists for housing, and the projections, and to indicate whether there is likely to be a mismatch.</p> <p>The submission asks SDCC to provide feedback to ABP regarding permissions granted under SHD and the actual needs of the county.</p>	<p><b>CE Response:</b></p> <p>The issues raised in the submission are noted. The Planning Authority engages with the Board on SHDs at prescribed stages of the process. The issues raised in the submission have been brought to the attention of the Board. However, decisions by the Board must adhere to the provisions of SPPR1 set out in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities which state that Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s).</p> <p>The Draft Development Plan includes a Housing Strategy and Interim HNDA contained within Appendix 11 of the Development</p>

		<p>Plan which carries out an evidence-based assessment for the County up to 2028.</p> <p>The conclusion of the Housing Strategy and Interim HNDA outlines that by 2031 one, two and three person households will make up 65% of the household composition indicating that the majority of households will need one and two bed units. The remaining 35% of households will comprise 4 persons+ of which will have a need for three and greater bed units. This is outlined in Section 6.8.3 of the Housing Strategy and Interim HNDA. It is further noted that in 2016, South Dublin had the highest amount of 3/4 bedroom dwellings (5-6 rooms at 47.8%) compared to the Dublin (36.9%), Region (38.7%) and State (39.9%) averages and the lowest studio-1-bed / 2 bed (1-2 rooms and 3-4 rooms) in the Dublin, Region and States averages. It is noted that the 3–4-bedroom mix figures apply to the entire County of South Dublin. While it is recognised that the figure is high by comparison to the Region, new development and planning permissions granted are likely to increase the smaller unit sizes with heavy concentrations of unit types within the regeneration lands and along the Luas lines.</p> <p>Therefore, the Draft Plan recognises the importance to provide a mix of housing type and this is underpinned by Policy H1 and the associated objectives. Of particular note is H1 Objective 13 H1 Objective 13 ensures to provide for 3 Bed units as per the evidence basis carried out and only a smaller unit size will be acceptable where the criteria set out in the policy can met. It should be noted that on foot of recommendations made by the Office of Planning Regulator (OPR) minor amendments have been made to H1 Objective 13. Notwithstanding this, it is noted that intent of the Objective which seeks to provide a minimum of 30% 3-bedroom units unless specific criteria can be demonstrated, has not changed. See recommended amendments outlined in the response to the OPR submission at the beginning of this report (SD-195-227).</p>
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		<p>It should be further noted that in the preparation of the Housing Strategy and Interim HNDA, the planning department liaised with the Housing Department of South Dublin County Council in order to prepare these evidence-based documents.</p> <p>In addition, H1 Objective 12 of the Draft Plan seeks to examine the need to vary the Development Plan, following the publication of the guidance on HNDA methodology issued by the Department of Housing, Local Government and Heritage in April 2021. Therefore, a further review of household composition will be examined and updated if deemed necessary.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan - See recommended amendments outlined in the response to the OPR submission at the beginning of this report (SD-195-227) with regard to H1 Objective 13.</p>
<p><a href="#">SD-C195-213 An Taisce</a></p>	<p>The An Taisce submission notes that to achieve compact and sustainable settlement, combat rising transport emissions, and improve the quality of life for citizens, it is imperative that the new CDP addresses future population growth and continues to encourage a shift towards walkable, cyclable, transit orientated and consolidated urban forms. A crucial aspect of this will be the maintenance of and improvement in investment in public transport, walking and cycling to offer communities viable alternatives to private cars.</p> <p>It recommends that the CDP should be guided by existing and planned social and physical infrastructure including realistic proposals for addressing capacity constraints.</p> <p>An Taisce welcomes the many commitments throughout the Draft to promote compact development.</p> <p>The submission recommends that the Council use the seven location test standards for new housing set out in the now replaced National Spatial Strategy 2002 and which is based</p>	<p><b>CE Response:</b></p> <p>The issues raised in the submission are noted.</p> <p>In line with this national and regional policy provisions the strategic vision of the Draft Plan is informed by the core strategy and population targets set for the County. To achieve the overall plan vision a 'layered approach' has been applied to development with a focus on facilitating future growth in a manner which protects and enhances the County's natural cultural and built heritage, maximises opportunities for the development of the Green Infrastructure network, promotes the highest quality in urban design with the overall aim of delivering healthy places in which to live, work, visit, socialise, and invest in.</p> <p>Central to the achievement of this layered approach is the integration of Climate Action as a key overarching theme for all aspects of the Plan. This is further supported by the setting of targets for transport modes to influence, through policy and objectives, a change in behaviour to more active forms of travel.</p>

	<p>around a 7 point evaluation test; including asset, transport, carrying capacity, economic development, character, community and integration tests.</p>	<p>The policies and objectives in the Draft Plan support the strategic vision and South Dublin's leading role in sustainable development.</p> <p>With regard to Social and Physical Infrastructure, a rigorous Infrastructure Assessment and Social Infrastructure Audit was carried out that built on the initial Land Capacity Analysis. This assessment gathered pertinent data on identified lands in relation to their infrastructural constraints and requirements in order to differentiate between zoned land that is available for development and zoned land that requires significant further investment in services for infrastructure for development to be realised. This identifies the assets in each settlement and opportunities to ensure further growth is provided for in tandem with social and physical infrastructure. In particular, CS3 Objective 6 seeks to ensure the phased development of new housing areas in tandem with the delivery of physical and social infrastructure provision as identified within Local Area Plans or as informed by assessments carried out by the Planning Authority. It therefore considered that the Draft Plan provides for significant policies and objectives with great emphasis on delivering growth in tandem with the physical and social infrastructure.</p> <p>The submission refers to the location test standards for new housing similar to that of the evaluation test set out in the National Spatial Strategy. It should be noted that Draft Plan has been prepared in accordance with the requirements set out under the Project Ireland 2040 National Planning Framework (NPF) and National Development Plan, the Eastern Midlands Regional Spatial and Economic Strategy (RSES) and the Dublin Metropolitan Area Strategic Plan (MASP). With respect to the issues raised in the submission, it noted that such an evaluation test does not exist in the NPF or the RSES. However, it is noted that the RSES sets out in Table 3.1 Asset/Potential Based Criteria approach to growth settlement. In this regard, an analysis of the lower tier settlements was carried out to determine their scale,</p>
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		<p>function and role within the overall County having regard to the RSES settlement hierarchy descriptions. Asset-based assessments were carried out for Newcastle and Rathcoole and these are set out under Appendix 2B of the Draft Plan. Settlements within Dublin City and Suburbs are not subject to an asset test as they are located in the MASP, however, as outlined above they were subject to a land capacity analysis which included an infrastructural assessment and a social infrastructure assessment.</p> <p>It is therefore considered that the Draft Plan contains provisions which encourage compact growth in tandem with required infrastructure and have directed housing growth in settlements which accord with regional and national policy.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<p><a href="#">SD-C195-205 Land Development Agency</a></p>	<p>Regarding the development of the Adamstown SDZ, the submission notes the following reference in the Draft Development Plan: "the Council has (...) successfully 'bided' for funding for parks, roads and other infrastructure under the LIHAF and URDF mechanisms". In this regard, the Land Development Agency (LDA) seeks further clarity on the funding available through the URDF and Local Infrastructure Housing Activation Fund (LIHAF).</p>	<p><b>CE Response:</b></p> <p>South Dublin County Council was successful in achieving €9.7 million in URDF (central government) funding for the Adamstown SDZ which will provide for public infrastructure and amenities that will facilitate the development of the Adamstown Town Centre and the continued roll-out of homes around the Town Centre. On foot of this funding, more than 580 new homes will be constructed, which will support the provision of much needed social, affordable and private housing in the west Dublin area. This project will deliver the following supplementary, strategic town centre infrastructure:</p> <ul style="list-style-type: none"> <li>• Central Boulevard Park,</li> <li>• Construction of a civic/library, and</li> <li>• Construction of a district/town centre plaza/square.</li> </ul>

		<p>The delivery of high-quality public spaces and facilities will support the creation of the town centre adjacent to Adamstown Train Station to serve the existing and new communities.</p> <p>South Dublin County Council are currently working through the next stages of the URDF funding process however the details of this are not a County Development Plan specific issue.</p> <p>The details of funding sought at this time are not a matter for the County Development Plan.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<p>SD-C195-133 CAIRN Plc</p> <p>SD-C195-113 CAIRN Plc</p>	<p>The submission is seeking that the preparation of the new Development Plan takes into account the additional provision allowed in the DDPGs and identifies additional core strategy population targets for the Clonburris SDZ to meet the commitments in respect of the delivery of the significant public investment in infrastructure via the Urban Regeneration and Development Fund (URDF) as well as the Dart + programme, which will add significant capacity to the railway line and stations which will serve the Clonburris SDZ.</p> <p>The submission welcomes the support of the commentary in the Draft Development Plan in respect of the development of lands within the Clonburris SDZ which “represent a major expansion of the footprint of Clondalkin along the Dublin-Cork rail corridor” and that the Council will continue to actively promote the delivery of sufficient public transport and road capacity, in tandem with future development of the SDZ. The submission acknowledges the significant funding which has been achieved through the URDF to provide infrastructure to facilitate early development at Clonburris. The submission supports CS7 Objective 4.</p>	<p><b>CE Response:</b></p> <p>The issues raised in the submission are noted.</p> <p>Lands at Clonburris have an approved SDZ Planning Scheme (May 2019). The development of Clonburris will be provided for, in a sustainable, phased manner, so as to cater for all the necessary social and physical infrastructure. The Draft Plan specifically provides for this phasing under CS7 Objective 4: <i>‘To promote and facilitate development at the Strategic Development Zones at Adamstown and Clonburris, in accordance with their planning scheme and associated phasing requirements, whilst adapting to and facilitating emerging transport service level pattern needs.’</i></p> <p>The Core Strategy has allocated growth based on an estimated year on year unit delivery rate within each Neighbourhood Area which ensures compliance with National and Regional population projections. Consideration was also given to ensuring that the delivery of housing to meet the needs of current and future population in line with national targets during the course of the plan period can be sustainably achieved. In this regard the balance between the deliverability of units and avoiding an overly</p>

		<p>rigid identification of individual capacity lands forms a key part of the Core Strategy.</p> <p>The approach taken considers the need to promote compact growth in a balanced way within each neighbourhood area according to its role and function within the settlement hierarchy. The plan prioritises a level of growth of undeveloped land with a focus on strategic development areas, such as Clonburris, identified under the MASP which amount in total to 71% of the county's unit allocation.</p> <p>Where it is found that delivery rates are exceeding the allocation for a particular neighbourhood area the plan provides flexibility under policy CS3 Objective 3. This allows for the Council to consider the re-distribution of housing population figures within the neighbourhood areas where the applicant must demonstrate to the Planning Authority that the proposal is aligned with the overall growth target for the County, with any necessary investment in infrastructure and with the provision of employment together with supporting amenities and services. It noted that recommendations have been made that specifically relate to CS Objective 3 and as a result the objective has been strengthened further by including a reference to ensuring the totality of planning population/housing growth is aligned with the overall growth target for the County and that such development is aligned with investment in infrastructure and the provision of employment together with supporting amenities and services. See recommended changes outlined in the response to the OPR submission at the beginning of this report (SD-195-227) with regard to CS3 Objective 3.</p> <p>The Council will monitor the delivery of housing units to ensure general compliance with the Core Strategy and housing supply targets for the County and to inform the redistribution potential outlined above. The Core Strategy figures for each neighbourhood area serve as a benchmark for monitoring to ensure compliance with National and Regional figures. In this</p>
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		<p>context it is not considered appropriate to provide for 'Additional Provision'.</p> <p>The support of the commentary in relation to infrastructure in Clonburris and CS7 Objective 4 is also noted and welcomed.</p> <p><b>CE Recommendation:</b></p> <p>No Change to Draft Plan.</p>
SD-C195-119 People Before Profit	<p>The submission welcomes approaches taken in the County Development Plan, including a focus on compact growth and an end to urban sprawl. The focus on Adamstown &amp; Clonburris SDZs as well as the regeneration of the Naas Rd area, now known as City Edge is welcomed. This means limited development will continue to take place in areas such as Citywest/Saggart, Newcastle and Rathcoole but no further land has been re-zoned which is welcomed. These areas now require public services and community infrastructure to cater for the population there.</p>	<p><b>CE Response:</b></p> <p>The welcoming of policy with regard to the focus on compact growth and the focus on SDZ's and regeneration areas in the Draft Plan is noted.</p> <p>The Chief Executive further reinforces that there is no need to re-zone lands or zone new additional lands over and above those currently set out under the current 2016 County Development Plan and to do so would be contrary to National and Regional planning policy. The requirement for public services and community infrastructure to cater for the relevant populations is acknowledged. The Draft Plan contains policy and a number of objectives which support and require physical and social infrastructure to be delivered in tandem with development.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>

Core Strategy		
Submission No.	Submission Summary	CE response and recommendation
SD-C195-63 Kildare County Council	<p>This submission supports the inclusion of the South West Strategic Corridor in the Draft CDP having relevance for both Kildare and South Dublin.</p>	<p><b>CE Response:</b></p>

		<p>The support for the inclusion of the South West Strategic Corridor in the Draft Plan is noted and welcomed.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<p><a href="#">SD-C195-130 BOC Gases</a></p>	<p>The submission notes that BOC Gases headquarters is in Bluebell off the Naas Road and have operated from this site for over 60 years. It is highlighted that the Bluebell site is an Upper Tier Establishment, as defined by the Control of Major Accident Hazards (COMAH) Regulations 2015. The designation is due to the possibility of major accidents from the production and distribution of dangerous substances at the site.</p> <p>The submission notes that there is investment locked into the highly specialised and high-cost plant that has been installed and developed at this site over many years. The submission argues that the plant is complex and not simple machinery or a 'footloose' distribution facility that can be easily moved elsewhere.</p> <p>The submission considers that as an overarching policy for the proposed regeneration of Naas Road / Ballymount area, it is important that Policy CS2 creates the hierarchy of key considerations for subsequent objectives and accordingly, the submission requests the following additional text is added to Policy CS2:</p> <p>'Deliver a development framework for the regeneration of the Naas Road lands in conjunction with Dublin City Council which underpins the strategic aims of the National Planning Framework and Regional Spatial and Economic Strategy.</p> <p><b>This development framework will balance the operational requirements of existing Naas Road occupiers with the</b></p>	<p><b>CE Response:</b></p> <p>The City Edge (Naas Road/ Ballymount) lands form a significant landbank within South Dublin County adjoining Dublin City Council area. The development of the City Edge lands, as noted under the RSES, requires a medium to long-term infrastructure sequence with potential for residential development and more intensive employment/mixed uses, both on a large scale. The development of this area requires significant investment to enable the full development potential and will be subject to a Strategic Framework Plan which will inform the further preparation of a LAP or equivalent statutory plan in collaboration with Dublin City Council.</p> <p>The Council is aware that there are many different landowners in the area and liaison with these landowners will continue as part of the planning process for the area. Policy CS2 seeks to deliver a development framework for the regeneration of the City Edge lands in conjunction with Dublin City Council underpinning the strategic aims of the National Planning Framework and Regional Spatial and Economic Strategy. The objectives related to Policy CS2, that is CS2 Objective 1 and CS2 Objective 2 provide greater detail. In particular CS2 Objective 2 states:</p> <p><i>To facilitate a co-ordinated approach and vision to any future sustainable development of the Naas Road Framework area in consultation with Dublin City Council, and all relevant stakeholders including the local community, and ensure that the needs of the existing and new community will be met, and the provision of</i></p>

	<p><b>desire for a greater density of development and mix of uses.'</b></p>	<p><i>necessary community and physical infrastructure is delivered in tandem with any new development.</i></p> <p>Having regard to the existing objectives which indicate consultation with stakeholders and refer to consultation processes which have already started under the City Edge Project in Q3 2021 and which will continue as the project progresses, it is considered that the requested amendment to the existing high level Policy CS2 is not required.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<p><a href="#">SD-C195-130 BOC Gases</a></p>	<p>This submission looks for the following amendment to Policy CS2 Objective 1:</p> <p>'To prepare a Local Area Plan or other appropriate mechanism for the zoned Regeneration (REGEN) lands at Naas Road/Ballymount to include the Local Centre zoning (LC) at Walkinstown. The LAP or equivalent will provide a framework for the sequential and phased development of the lands, <b>acknowledging that some lands may not be developed due to the retention of existing operations. The LAP or equivalent</b> will integrate sustainable transport, land use and blue and green infrastructure. The spatial planning of the area will be informed by the Naas Road Framework until such time as a Statutory Plan is in place.'</p>	<p><b>CE Response:</b></p> <p>The City Edge (Naas Road/ Ballymount) lands form a significant landbank within South Dublin County adjoining the Dublin City Council area. The development of the City Edge lands, as noted under the RSES, requires a medium to long-term infrastructure sequence with potential for residential development and more intensive employment/mixed uses, both on a large scale. The development of this area requires significant investment to enable the full development potential and will be subject to a Strategic Framework Plan which will inform the further preparation of a LAP or equivalent statutory plan in collaboration with Dublin City Council.</p> <p>Policy CS2 seeks to deliver a development framework for the regeneration of the City Edge lands in conjunction with Dublin City Council which underpins the strategic aims of the National Planning Framework and Regional Spatial and Economic Strategy with Objectives CS2 Objective 1 and 2 underpinning this policy at a strategic level. Such provisions provide for a level of flexibility for a more detailed design process to be carried out in regard to these lands. This process has commenced under the City Edge Project</p>



		<p>with the preparation of a Strategic Framework due to be completed in early 2022.</p> <p>The objectives in the Draft Plan facilitate the provision of enterprise and/or residential development in a manner which facilitates consultation as part of the delivery of the Naas Road Framework and of a forthcoming LAP or equivalent statutory plan for the area, now branded the City Edge Project.</p> <p>Given the high-level nature of policy and objectives under CS2 and the ongoing progression of the City Edge Project which will have to deal with various issues including amalgamation of lands, land ownership and retention of existing operations, it is not considered that the inclusion of the proposed additional wording is necessary.</p> <p>It is noted that a revision is incorporated into CS2 Objective 2 under the submission SD-C195-130.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<p><a href="#">SD-C195-130 BOC Gases</a></p>	<p>This submission looks for the following amendment to Policy CS2 Objective 2:</p> <p>'To facilitate a co-ordinated approach and vision to any future sustainable development of the Naas Road Framework area in consultation with Dublin City Council, and all relevant stakeholders including the local community <b>and existing businesses</b>, and ensure that the needs of the existing and new community will be met, and the provision of necessary community and physical infrastructure is delivered in tandem with any new development'.</p>	<p><b>CE Response:</b></p> <p>The City Edge (Naas Road/ Ballymount) lands form a significant landbank within South Dublin County adjoining the Dublin City Council area. The development of the City Edge lands, as noted under the RSES, requires a medium to long-term infrastructure sequence with potential for residential development and more intensive employment/mixed uses, both on a large scale. The development of this area requires significant investment to enable the full development potential and will be subject to a Strategic Framework Plan which will inform the further preparation of a LAP or equivalent statutory plan in collaboration with Dublin City Council.</p>

		<p>Policy CS2 seeks to deliver a development framework for the regeneration of the City Edge lands in conjunction with Dublin City Council which underpins the strategic aims of the National Planning Framework and Regional Spatial and Economic Strategy with Objectives CS2 Objective 1 and 2 underpinning this policy at a strategic level. Such provisions provide for a level of flexibility for a more detailed design process to be carried out in regard to these lands. This process has commenced with the preparation of a strategic framework for the City Edge lands, to be completed in early 2022 and which will be followed by a more detailed statutory plan.</p> <p>The objectives in the Draft Plan facilitate the provision of enterprise and/or residential development in a manner which facilitates consultation as part of the delivery of the Naas Road Framework and of a forthcoming LAP or equivalent statutory plan for the area, now branded the City Edge Project.</p> <p>However, the inclusion of the words ‘and existing businesses’ is considered reasonable. It is also considered appropriate to replace the term ‘in consultation’ with ‘in collaboration’ in order to correctly reflect the working relationship between SDCC and DCC in relation to the City Edge Project.</p> <p><b>CE Recommendation;</b></p> <p>To amend CS2 Objective 2 from:</p> <p>To facilitate a co-ordinated approach and vision to any future sustainable development of the Naas Road Framework area in consultation with Dublin City Council, and all relevant stakeholders including the local community and ensure that the needs of the existing and new community will be met, and the provision of necessary community and physical infrastructure is delivered in tandem with any new development</p> <p><b>To Read:</b></p>
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		To facilitate a co-ordinated approach and vision to any future sustainable development of the <del>Naas Road Framework</del> <b>City Edge</b> area in <b>collaboration with Dublin City Council</b> , and all relevant stakeholders including the local community <b>and existing businesses, having regard to their operational needs</b> , and ensure that the needs of the existing and new community will be met, and the provision of necessary community and physical infrastructure is delivered in tandem with any new development'
<a href="#">SD-C195-109 South Dublin Conservation Society</a>	A submission calls for no further rezoning of lands surrounding Corkagh Regional Park for new residential development as there is sufficient lands available in Adamstown/Clonburris SDZ.	<p><b>CE Response:</b></p> <p>The issue raised are noted. The Draft Plan does not propose any additional residential rezoning in the lands surrounding Corkagh Regional Park. To re-zone or zone new additional residential lands over and above those currently set out in the Draft Plan would be contrary to National and Regional planning policy.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<a href="#">SD-C195-229 Glenveagh Properties</a>	The submission refers to Table 10 of the Draft CDP which allocates a number of housing units which can be completed within each of the Neighbourhood Areas. In order to justify the overprovision of zoned lands, the Draft CDP indicates that monitoring at the settlement level, 'with options to transfer a portion of the allocated units from one neighbourhood to another, subject to considering key criteria during the lifetime of the Development Plan". In this regard, it is submitted that details of the 'key criteria' are not clearly outlined in the Draft CDP and the submission highlights a need for greater clarity on how this transfer of units would be assessed, monitored and communicated. It is considered that there needs to be confidence that there is capacity for growth in individual settlement areas to ensure that proposals for new development schemes can progress..	<p><b>CE Response:</b></p> <p>The Draft Plan sets out housing targets for each neighbourhood area. Recognising that some sites may come forward before others and having regard to the role of the market in delivering housing, options to transfer a portion of the allocated units from one neighbourhood area to another are provided for. This is dealt with specifically under CS3 Objective 3.</p> <p>It is noted that in line with recommendations of submission SD-195-227 Office of the Planning Regulator (OPR), an examination has been carried out of various aspects of the Draft Plan. In particular, recommendations have been made that specifically relate to CS Objective 3 and as a result the objective has been strengthened further by including a reference to ensuring the totality of planning population/housing growth is aligned with the overall growth target for the County and that such development is</p>

		<p>aligned with investment in infrastructure and the provision of employment together with supporting amenities and services.</p> <p>It is recommended that that CS3 Objective 3 will now read '<i>To provide for flexibility in achieving the housing supply targets and meeting housing demand, the Council will consider the re-distribution of housing and population figures within the settlement and Neighbourhood Areas. In this regard, where a site greater than 0.25ha has the potential to exceed the allocation for a particular Neighbourhood Area as set out under Core Strategy Table 10, the applicant must demonstrate to the Planning Authority that the <b>proposal is aligned with the overall growth target for the County, any necessary investment in infrastructure and the provision of employment together with supporting amenities and services.</b> <del>necessary social and physical infrastructure is in place or can be provided as part of the application to accommodate the proposed development.</del></i>'</p> <p>See recommended changes outlined in the response to the OPR submission at the beginning of this report (SD-195-227).</p> <p>Notwithstanding the above, it noted that intent of the Objective has not changed. In this regard the Council will monitor the delivery of housing units to ensure compliance with the Core Strategy and housing supply targets for the County and to inform the redistribution potential as required. A site must be greater than 0.25ha, with potential to exceed targets for the settlement for the objective to apply. In order for a transfer to be considered feasible the applicant must demonstrate to the Planning Authority that the proposal is aligned with the overall growth target for the County, with any necessary investment in infrastructure and with the provision of employment together with supporting amenities and services.</p> <p>It is considered that CS3 Objective 3 and the recommendation to strengthen the same adequately addresses the issue raised.</p>
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		<p><b>CE Recommendation:</b></p> <p>No change to Draft Plan - See recommended changes outlined in the response to the OPR submission at the beginning of this report (SD-195-227) with regard to CS3 Objective 3.</p>
<p><a href="#">SD-C195-229 Glenveagh Properties</a></p>	<p>It is submitted that Tallaght's allocation of new housing units in the County Development Plan should be increased to have regard to the LAP which was only published last year and provides a clear framework for new development in the Town Centre.</p> <p>In this regard, the submission noted that while a total of 2,000 units has been allocated to Tallaght in the Draft CDP, this is below the number of units envisioned in the 2020 Tallaght Town Centre LAP which projected 3,000 to 5,000 units being delivered from 2020-2026. Even when consideration has been given to the estimated number of units completed to 2021, there is a significant reduction in the total number of units which can be delivered during the lifetime of the County Plan.</p>	<p><b>CE Response:</b></p> <p>The issues raised in the submission are noted.</p> <p>The Tallaght Local Area Plan was adopted in June 2020. The LAP promotes the sustainable development of the LAP lands by facilitating more intensive land-uses in REGEN zoned land to accommodate higher density residential and employment uses. It is noted that while the LAP has a statutory 6-year timeframe, its full build out, which includes significant regeneration and intensification of brownfield lands and changing character areas, is envisaged over a longer period of up to 20 years.</p> <p>The Core Strategy has allocated growth based on an estimated year on year unit delivery rate within each Neighbourhood Area which ensures compliance with National and Regional population projections. Consideration was also given to ensuring that the delivery of housing to meet the needs of current and future population in line with national targets during the course of the plan period can be sustainably achieved. In this regard the balance between the deliverability of units and avoiding an overly rigid identification of specific individual capacity lands forms a key part of the Core Strategy. The approach taken considers the need to promote compact growth in a balanced way within each neighbourhood area according to its role and function within the settlement hierarchy.</p> <p>Chapter 2 Table 10 provides for a unit allocation of 2,000 units over the plan period (11% of the County's overall growth) to the neighbourhood area of Tallaght. Over the plan period this equates to a year-on-year unit delivery allocation of c. 334 units which is considered reasonable for this area. While new construction</p>

		<p>techniques may potentially result in an increased supply/delivery of housing completions it is considered that the allocation for this neighbourhood area is appropriate.</p> <p>Notwithstanding the above, the Draft Plan recognises that some sites may come forward before others and having regard to the role of the market in delivering housing, options to transfer a portion of the allocated units from one neighbourhood area to another are provided for. This is dealt with specifically under CS3 Objective 3.</p> <p>It is noted that in line with recommendations of submission SD-195-227 Office of the Planning Regulator (OPR), an examination has been carried out of various aspects of the Draft Plan. In particular, recommendations have been made that specifically relate to CS Objective 3 and as a result the objective has been strengthened further by including a reference to ensuring the totality of planning population/housing growth is aligned with the overall growth target for the County and that such development is aligned with investment in infrastructure and the provision of employment together with supporting amenities and services.</p> <p>It is recommended that that CS3 Objective 3 will now read: <i>'To provide for flexibility in achieving the housing supply targets and meeting housing demand, the Council will consider the re-distribution of housing and population figures within the settlement and Neighbourhood Areas. In this regard, where a site greater than 0.25ha has the potential to exceed the allocation for a particular Neighbourhood Area as set out under Core Strategy Table 10, the applicant must demonstrate to the Planning Authority that the <b>proposal is aligned with the overall growth target for the County, any necessary investment in infrastructure and the provision of employment together with supporting amenities and services.</b> <del>necessary social and physical infrastructure is in place or can be provided as part of the application to accommodate the proposed development.'</del></i></p>
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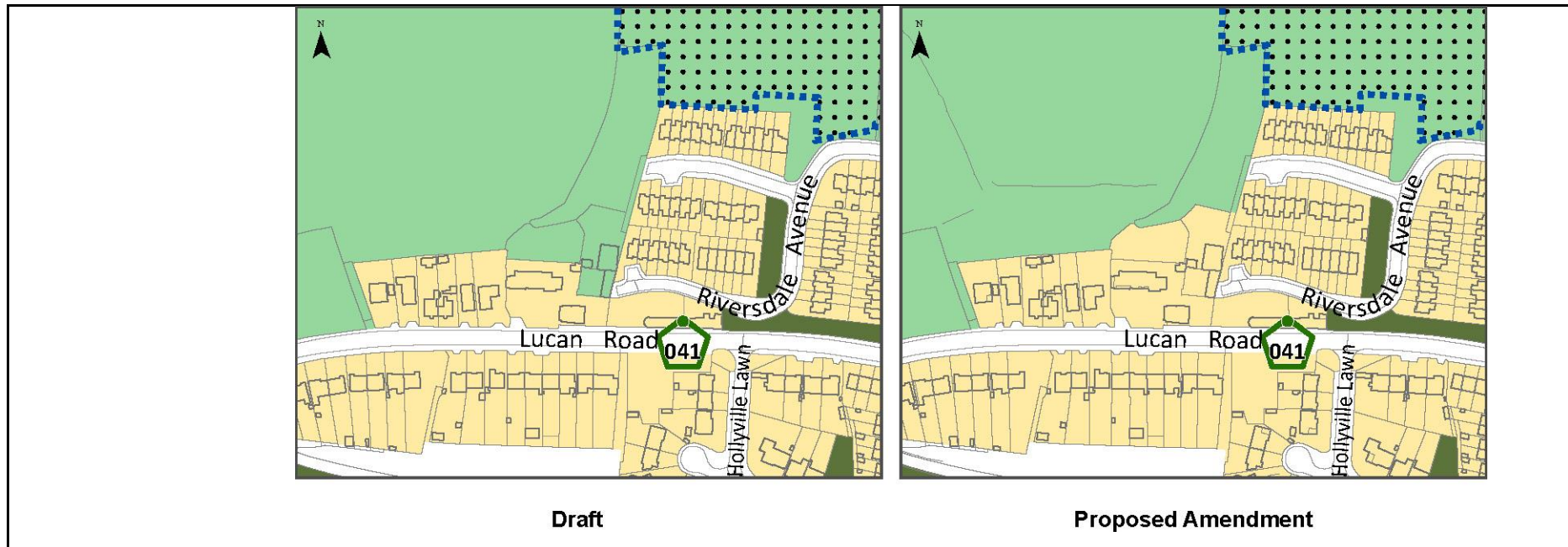
		<p>See recommended changes outlined in the response to the OPR submission at the beginning of this report (SD-195-227).</p> <p>Notwithstanding the above, it noted that intent of the Objective has not changed. In this regard the Council will monitor the delivery of housing units to ensure compliance with the Core Strategy and housing supply targets for the County and to inform the redistribution potential as required. A site must be greater than 0.25ha, with potential to exceed targets for the settlement for the objective to apply. In order for a transfer to be considered feasible the applicant must demonstrate to the Planning Authority that the proposal is aligned with the overall growth target for the County, with any necessary investment in infrastructure and with the provision of employment together with supporting amenities and services.</p> <p>It is considered that CS3 Objective 3 and the recommendation to strengthen the same adequately addresses the issue raised. Furthermore, the Draft Plan provides for the following provisions which support and encourage the growth of Tallaght. Of particular notes are the following: QDP13 Objective 1, EDE4 Objective 11, and H1 Objective 16.</p> <p>In this context it is considered that the provisions of the Tallaght Town Centre Local Area Plan and the policies and objectives of the Draft Plan are aligned and appropriately support the growth of Tallaght LAP lands in a sustainable manner.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan - See recommended changes outlined in the response to the OPR submission at the beginning of this report (SD-195-227) with regard to CS3 Objective 3.</p>
SD-C195-229 Glenveagh Properties	The submission notes that the number of units allocated to Citywest is 2,833 new units which is 16% of the new units for the County.	<p><b>CE Response:</b></p> <p>The issues of the submission are noted. The relatively new district area, in Fortunestown/Citywest has been developing over the last</p>

	<p>It is further noted that the Draft CDP makes reference to the delivery of growth at Citywest is in accordance with the Fortunestown Local Area Plan however, this LAP will no longer be in effect after May 2022.</p> <p>The submission requests that the Draft CDP be updated to reflect that the Fortunestown LAP will no longer be in effect once the new County Plan is adopted and provide further elaboration regarding the Development Plan superseding the current LAP's (such as Fortunestown Local Area Plan 2012) and the potential impacts this may have on issues such as zoning and density.</p>	<p>number of years at a significant pace and is subject to a Local Area Plan (LAP). 'Fortunestown Local Area Plan 2012-2022'.</p> <p>In recognition that the LAP will expire in 2022 the Draft Plan includes two SLOs directly relating to the Fortunestown area, in addition to CS3 Objective 6 which states:</p> <p><i>To ensure the phased development of new housing areas in tandem with the delivery of physical and social infrastructure provision as identified within Local Area Plans or as informed by assessments carried out by the Planning Authority.</i></p> <p>The two SLOs relating to Fortunestown which provide clarity on the requirements for further infrastructure within the LAP lands are as follows,</p> <p>COS2 SLO1 states:</p> <p><i>That Citywest / Fortunestown areas are provided (from within their own community) public, purpose built and suitable amenities including:</i></p> <ul style="list-style-type: none"> <li>• <i>Library;</i></li> <li>• <i>Community centre and a community café;</i></li> <li>• <i>Accessible playgrounds/playspaces, teenspaces and youth amenities (such as a skate park);</i></li> <li>• <i>Designed green spaces including a managed public park with adequate,</i></li> <li>• <i>accessible public seating and that can host festivals and community events;</i></li> <li>• <i>Greater biodiversity in the area and more tree coverage;</i></li> <li>• <i>Adequate numbers of pitches and clubhouses/pavilions for sports;</i></li> <li>• <i>Adequate public childcare and afterschool facilities; and</i></li> <li>• <i>School sites.</i></li> </ul> <p>QDP14 SLO1 states:</p>
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		<p><i>To ensure the sustainable long-term growth of Citywest that promotes and facilitates the development of the Citywest/Fortunestown area in accordance with the Fortunestown Local Area Plan ensuring that phasing is not contravened and that appropriate levels of services, social and sports infrastructure, facilities and economic activity is met to meet the needs of the current and future population growth.</i></p> <p>To provide further clarity it is considered that QDP14 SLO1 is amended to insert the dates of the Fortunestown LAP and commitment to the sustainable long-term development of the area through phasing set out in the Plan alongside the COS2 SLO1.</p> <p><b>CE Recommendation:</b></p> <p>Amend QDP14 SLO1 to read as follows:</p> <p>To ensure the sustainable long-term growth of Citywest that <b>continues to</b> promote and facilitate the development of the Citywest/Fortunestown area in accordance with the <b>phasing set out in the Fortunestown Local Area Plan 2012-2022 (as extended) or any superseding LAP</b>, and that appropriate levels of services, social and sports infrastructure, facilities and economic activity is met to meet the needs of the current and future population growth.</p>
<p><a href="#">SD-C195-301 Peter Keenahan</a></p>	<p>The submission relates to lands located at Riversdale House, Old Lucan Road, Palmerstown. The submission indicates that the front portion of the lands subject to this submission is zoned residential while the back portion is zoned open space. It is submitted that the junction between the two different zoning objectives follows the irregular line of secondary divisions and ancillary buildings on the site.</p> <p>The submission outlines zoning in the immediately surrounding area.</p>	<p><b>CE Response:</b></p> <p>The submission requests the zoning be changed from open space to residential.</p> <p>It would appear that the lands in question serve as a private recreational area to the rear of Riversdale House and do not serve or form part of the adjoining residential development or agricultural fields. The subject lands comprise of a natural and heavily vegetated boundary that marks a distinct separation between the agricultural land and the space to the rear of the Riversdale House. The further agricultural area that extends from this space</p>

	<p>The submission notes the special amenity value of the Liffey Valley and how areas of open space are crucial to protecting the same. However, the submission notes that it is unclear how the open space zoning is intruding into the subject lands, and it is considered that such a zoning is arbitrary and illogical and will pose a serious obstacle to the orderly development of this landholding.</p> <p>The submission therefore requests the zoning be changed from open space to residential.</p>	<p>to the north, functions as a buffer for the River Liffey which is under a Special Amenity Area Order.</p> <p>Land use zoning objectives do not necessarily follow property boundaries. However, having regard to the permitted uses immediately adjacent, the rationalisation of a small area of land currently serving private open space and access to the subject land, it is considered that the subject lands zoned Objective 'OS' is re-zoned Objective 'RES', thereby providing one single land use class pertaining to the overall site.</p> <p><b>CE Recommendation:</b></p> <p><b>Amend Map 2</b> to change from:</p> <p>Objective OS – Open Space – <i>'To preserve and provide for open space and recreational amenities'</i></p> <p>to</p> <p>Objective RES - Existing Residential – <i>'To protect and/or improve residential amenity'</i>.</p>
<p><b>CE Recommendation:</b></p>		



SD-C195-215 Simon Clear & Associates

The lands subject of this submission comprise 3.23 Hectares (8 acres) located at Newlands between Newlands Cross and The Red Cow Roundabout approximately 4km southwest of Dublin City Centre. The submission notes that a pre-draft submission was submitted in respect of these lands (Ref. SD-C147-154).

The submission requests that the rear of the subject lands, which fronts Knockmeenagh Lane, be rezoned to Objective RES.

The submission considers that the RES zoning on this section of the site will provide an appropriate edge to Knockmeenagh Lane and a land use which is consistent with the existing surrounding developments. The submission

**CE Response:**

The submission requests that the rear of the site, which fronts Knockmeenagh Lane, be rezoned from Objective EE to Objective RES.

The Core Strategy and Settlement Strategy in Chapter 2 sets out population and housing figures. Having regard to these figures and the current excess of zoned land, without the need for further zoning, it is considered that there is sufficient flexibility to meet the household requirements for 2031 and potentially up to 2040. The revised target figures in response to the OPR recommendations, set out separately under the response to the OPR, do not impact on the excess land capacity available to meet the revised targets. Therefore, to re-zone or zone new additional lands over and

	<p>highlights that the remainder of the subject lands would maintain the current EE zoning.</p> <p>Furthermore, it is noted that there is no policy context for major road corridor conditions in the draft Building Height and Density Guide prepared in conjunction with the draft SDCDP.</p> <p>The submission outlines the previous and present planning context and policy of the site and considers there is an absence of specific proactive policy for this location and highlights that the edge condition on the N7 approach to Dublin City centre has disimproved over the past decade and a policy change is required to redress the situation. The submission suggests that this may be best provided by a SLO. It is considered that the commercial edge can be maintained with edge-scaled buildings appropriate to a major corridor and public transport node context, accessed from the N7 slip road. A SLO can ensure no rat run possibility from the N7 to Clondalkin across the site via Knockmeenagh Road, or vice versa from Clondalkin to the N7.</p> <p>It is requested that the policy for development of the EE lands outside the defined City Edge Project area and along the N7 be strengthened to allow for the creation of an appropriate edge to a major corridor into Dublin City.</p>	<p>above those currently set out in the Draft Plan would be contrary to National and Regional planning policy.</p> <p>The Draft Plan sets out a potential for 31,824 jobs assuming an average of 51 jobs per hectare. In addition to this, there are 425ha of Regeneration (REGEN) zoned brownfield land forming part of the Tallaght Town Centre LAP and the Naas Road area, both areas are located in close proximity to the subject lands. While these lands currently provide a relatively low density of employees to land area, there is scope for re-intensification to accommodate higher density employment through a mix of uses. There remains a need within the County for lands to facilitate general employment type uses to facilitate a range of continued economic development and employment growth in the County over the Plan period. It is considered inappropriate to rezone the lands as requested given the on-going need for general employment lands and the surplus capacity of zoned residential land in the County.</p> <p>It is noted that the Draft Plan includes significant policy on design in Chapter 5 and in Chapter 13. The Draft Plan also includes the South Dublin County Building Height and Density Guide (Appendix 10) which provides at a County wide level the policy basis and toolkit to employ the delivery of increased building height and density, including detailed assessment criteria in relation to the development of Primary and Secondary Landmarks and Local Markers.</p> <p>For the reasons set out above, the rezoning of the subject lands to RES and the inclusion of the proposed new SLO in the Draft Plan is not considered appropriate.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<p><a href="#">SD-C195-282 David Kennedy</a></p>	<p>The submission relates to lands (21 acres in size) located at Kiltipper Road, Dublin 24.</p>	<p><b>CE Response:</b></p>

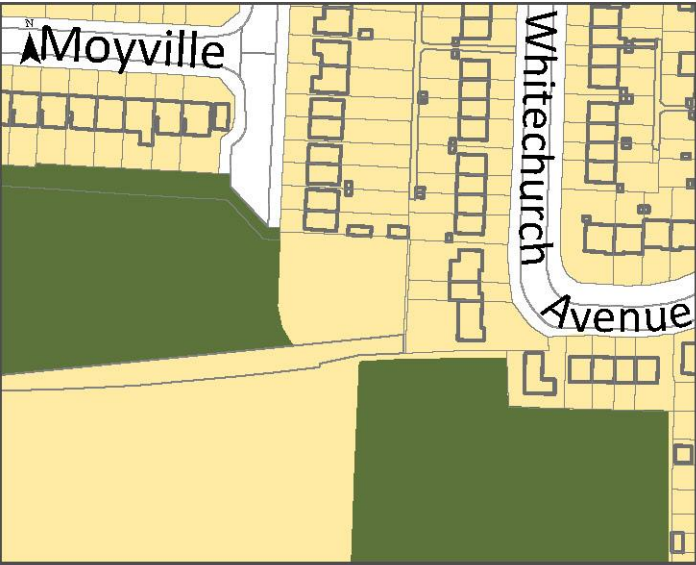
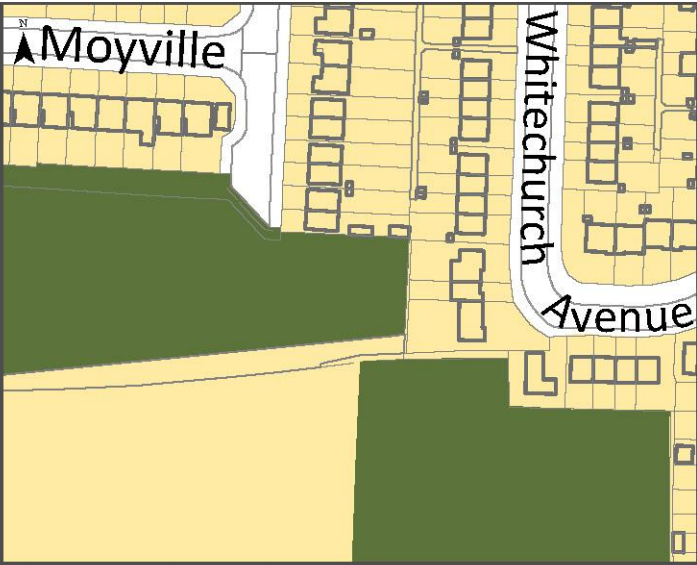
	<p>The submission requests for approximately 8.5 acres of land currently zoned as high amenity to be rezoned to RES or alternatively the inclusion of an SLO on the subject lands. The submission highlights that this parcel of land has immediate access to all services and direct road access from the Kiltipper Road. It is considered that the rezoning as residential could enable a mix of public and private housing to be developed whereby part could be earmarked for use by elderly.</p> <p>The submission highlights what it considers to be the additional community benefit that would arise from rezoning the land residential or allowing for an SLO to include public access to Dodder, Greenway facility, South Tallaght Link Road to alleviate traffic, access to services and enhanced sporting facilities.</p> <p>The submission refers to another submission made by a significant landowner of the extended adjoining lands. In addition to the request for rezoning and/or and SLO, it is submitted that the lands would facilitate the South Tallaght Link Road from Old Court Road to Kiltipper Road which should be provided for in Development Plan 2022 to 2026 (sic) in accordance with the NTA Strategy.</p> <p>The submission is accompanied by two appendices. The additional background material is in relation to the potential enhancements to the Dodder Greenway and provision of the South Tallaght link Roads and are contained in Appendices 1 and 2 of this submission.</p>	<p>The issues raised are noted.</p> <p>The submission requests the rezoning of 8.5 acres of the subject lands to RES and/or SLO to provide for residential units and/or units for the older persons. The Core Strategy and Settlement Strategy in Chapter 2 sets out population and housing figures which must be consistent with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) as required under the Planning and Development Act 2000 (As Amended). South Dublin County is anticipated to grow by 46,518 persons with the housing target for the County, as set by Ministerial Guidelines and the NPF Road Map, being 17,817 homes up to 2028. Chapter 2 also confirms that the County has enough land for a further 10,470 units (79%) above the net household need and therefore there is no need to re-zone additional lands or zone new additional lands over and above those currently set out under the current 2016 County Development Plan. Having regard to above figures set out in the Core Strategy and the current excess of zoned land, without the need for further zoning, it is considered that there is sufficient flexibility to meet the household requirements for 2031 and potentially up to 2040. The revised target figures in response to the OPR recommendations, set out separately under the response to the OPR, do not impact on the excess land capacity available to meet the revised targets.</p> <p>An SLO for residential development is suggested as an alternative to the RES zoning which would include for certain criteria including distance from the Dodder, an element of housing for the elderly and a value increment to the local authority for suggested uses. However, having regard to above figures set out the in-Core Strategy and the current excess of zoned land, without the need for further zoning, it is considered that there is sufficient flexibility to meet the household requirements for 2031 and potentially up to 2040. Therefore, to re-zone or zone new additional lands over and above those currently set out in the Draft Plan would be contrary</p>
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		<p>to National and Regional planning policy. Additionally, it should be noted that the underlying HA zoning would not facilitate the SLO being proposed.</p> <p>The subject lands are a visually and environmentally sensitive site that is zoned 'HA' (High Amenity - Liffey Valley, Dodder Valley and Dublin Mountains). Furthermore, the Dodder Valley is a proposed Natural Heritage Area (pNHA) and Policy NCBH4 and associated objectives of the Draft Plan relates to the protection of same. NCBH8 Objective 1 specifically refers to the restriction of <i>'development within areas designated with Zoning Objective 'HA – DV' (To protect and enhance the outstanding character and amenity of the Dodder Valley) and ensure that new development; - does not significantly negatively impact on cultural heritage assets, on sensitive habitats, species, and ecosystem services, - is related to the area's amenity potential, - is designed and sited to minimise environmental and visual impacts, - and enhances the County's green infrastructure network'</i>. Furthermore, NCBH8 Objective 5 specifically seeks to <i>'protect the upper Dodder Valley from Old Bawn Bridge to Fort Bridge as an ecological network free from intrusive lighting, facilitating the protection of light-sensitive species availing of the river corridor, and providing an appropriate urban/rural transition experience for all.'</i> Therefore, it is considered that the provision housing in the HA-DV zoning would be at variance with overarching policies and objectives relating to the protection of the Dodder Valley.</p> <p>The issue raised in regard to consistency with the National Transport Authority (NTA) Transport Strategy for the Greater Dublin Area (2016-2035) is noted. The Draft Plan provides for specific provisions to liaise with the NTA on transport projects and ensures consistency with the NTA strategy specifically under SM1 Objective 2: <i>'To ensure consistency with the NTA's Transport Strategy for the Greater Dublin Area (2016-2035) and any superseding document, as required by RPO 8.4 of the RSES.'</i> And SM1 Objective 7: <i>'To engage with relevant agencies including the</i></p>
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		<p>National Transport Authority (NTA) and Transport Infrastructure Ireland (TII) in relation to strategic and local transportation issues including delivery of transport projects and to encourage consultation with local communities'. Furthermore, it is noted that South Dublin County Council (SDCC) have made a submission to the NTA's draft Transport Strategy regarding the need for a transport study for the the Ballycullen/ Oldcourt area. Therefore, given the ongoing consultation process and pending the results of such a study it is premature to identify alignments of new roads in this area in the Draft Plan at this time.</p> <p>With respect to to the Dodder Greenway, any further off-road extension will go through an independent process to the Development Plan. It is noted that a collaborative project has been undertaken with Dun Laoghaire Rathdown County Council, Dublin City Council and the National Transport Authority for over 17km of the Dodder Greenway providing an integrated pedestrian and cycle route from the quays in Dublin City Centre to Glenasmole in the foothills of the Dublin Mountains. This underwent public consultation and a rigorous environmental and design approach in collaboration with the other authorities.</p> <p>It is noted that the Draft Plan employs a forward-looking approach to identify and promote new opportunities to improve the amenity and function of the County's GI network.</p> <p>The submission outlines that the subject lands in the wider land ownership context. It noted that while some of the landowners in this regard have made a separate submission, they are not signatories to this particular submission.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan</p>
SD-C195-272 NIALL BYRNE	The submission highlights that a portion of open space/green space lands comprising of 2.8 hectares in the southeast	<b>CE Response:</b>

	<p>section of Moyville Housing Development is zoned residential despite being part of a green space.</p> <p>The submission requests that this section of land be rezoned from RES 'Existing Residential' to the OS 'Open Space'.</p>	<p>The submission requests that the green space of Moyville housing development is rezoned from RES to OS.</p> <p>The subject lands are located and form part of an existing greenspace for the Moyville housing development and are located immediately adjacent to Edmundstown Golf Club Lands and bounded by a natural stone wall and is heavily vegetated with mature trees.</p> <p>The subject lands are zoned objective RES in their entirety within the Draft Plan and it is noted that they were also zoned RES in the 2016-2022 South Dublin Development Plan. Notwithstanding this, it would appear that the subject lands have an established open space setting ancillary to Moyville housing development. They are laid out as open space with maintained landscaping and is noted that the western extent of these lands are zoned OS.</p> <p>Furthermore, it is noted that the subject lands appear to be small in nature and to be in a single ownership which comprises of the other green spaces in the Moyville housing development and therefore it is considered that the subject lands form part for the public open space provision.</p> <p>In this context, it is considered appropriate to rezone the subject lands in their entirety given their established open space setting, extension of existing OS lands and the role they play in the provision of open space for the Moyville Housing Development.</p> <p><b>CE Recommendation:</b></p> <p><b>Amend Map 10</b> to change from:</p> <p>Objective RES - Existing Residential – <i>'To protect and/or improve residential amenity'</i>.</p> <p>to</p>
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		Objective OS – Open Space – ‘To preserve and provide for open space and recreational amenities’
<b>Recommendation</b>		
 <p style="text-align: center;"><b>Draft</b></p>		 <p style="text-align: center;"><b>Proposed Amendment</b></p>
SD-C195-272 NIALL BYRNE	The submission highlights that a section of Edmonstown Golf Club south of Moyville is zoned residential despite being an active part of the overall golf club and requests that it be changed to Open Space OS to match the rest of the golf club lands.	<p><b>CE Response:</b></p> <p>The submission requests the lands south Moyville housing development located at Edmondstown Golf Club are rezoned from RES to OS.</p> <p>It is noted that lands are of a significant sized landholding and actively comprise of the Edmondstown Golf course. The subject lands are zoned for residential development under the Draft Plan, the current Development Plan 2016-2022, and previous Development Plan 2010-2016.</p>

		<p>The subject lands are located within the Dublin City and Suburbs where residential consolidation is promoted. In this regard, it is an overarching objective of the Draft Plan to seek the sequential and phased development of lands, such as the subject lands. These lands are located within existing built-up area in Dublin City and Suburbs and will, therefore, support compact growth. In this regard, the Draft Plan has placed a significant emphasis on deliverability, monitoring and active land management. Therefore, it is considered appropriate that the lands remain zoned residential.</p> <p>In addition, it is considered that the proposed RES zoning objective will not impinge upon the continued operation or development of the uses on the subject lands. In this regard, it is noted that Section 13.1.1' Land-Use Zoning Tables', (vi) Non-Conforming Uses of the Draft Plan allows for instances throughout the County where land uses do not conform with the zoning objective of a site. Having regard to the function and existence of the golf course and the provisions of Section 13.1.1 (vi) in the Draft Plan, it is noted that continued use would be open for consideration and that the RES zoning does not prevent the existing golf course from remaining. The zoning objective serves to increase the range of land uses that could be realised on the subject site including residential development.</p> <p><b>CE Recommendation:</b></p> <p>No Change to Draft Plan</p>
SD-C195-276 Karen Garry	<p>The submission notes an apparent extension into Landale park under the “compact growth” strategy which allows moving the boundaries by up to a further 1,000 metres into the mature residential area of Ambervale, Landale and Springfield for more building of apartments/ compact housing.</p> <p>The submission states that the area has lost a lot of green parks with the recent part 8 developments now underway and</p>	<p><b>CE Response:</b></p> <p>The issues raised in the submission are noted. The submission relates to the lands of Landale Park. The Tallaght Town Centre LAP 2020 lands are located within the overall Tallaght Neighbourhood. Furthermore, the REGEN lands within Tallaght LAP are identified as a Strategic Development Area within the Draft Plan. A Neighbourhood Approach has been applied to the</p>

	<p>that the new buildings within Cookstown raise concerns of traffic and available amenities and facilities.</p>	<p>County Development Plan with the plan area sub-divided in to the seven Neighbourhood areas, of which Tallaght is one.</p> <p>It is noted that the subject lands appear to be just inside the boundary of the Tallaght Town Centre LAP adjacent to Cookstown. Within the LAP the lands are zoned Objective OS – Open Space ‘<i>To preserve and provide for open space and recreational amenities</i>’. Furthermore, a proposed strategic amenity route and new/improved cycle routes has been identified on the subject lands within the LAP. The LAP sets out to provide a connected neighborhood in terms of land use, and in particular places a great emphasis on access and movement and green infrastructure. The routes identified in the Tallaght LAP provide for connections from Cookstown through Lansdale Park to Jobstown Park. Objective OS5 of the LAP also seeks ‘<i>to connect parks and areas of open space with ecological and recreational corridors to aid the movement of biodiversity and people and to strengthen the overall Green Infrastructure network</i>’. Such amenity routes and green connections are further reinforced in the Draft Plan through the policies and objectives derived from the Green Infrastructure Strategy for county. It is therefore noted that protection and enhancement of green spaces is at the forefront of both the LAP and Draft Plan.</p> <p>Furthermore, the boundary of the LAP lands was determined when the first LAP was drawn up in 2004 and was determined by a number of factors including the census of population data areas available and relevant at the time. Based on this data, the areas are subject change on a regular basis hence the inclusion of the subjects in the current LAP boundary. At this time there is no planning reason to exclude this area from the LAP lands, it serves as an excellent connection between the LAP lands and the adjoining communities and as noted above has been designated with pedestrian and cycling routes to provide connects between the LAP lands and wider area. In addition, it serves as an excellent amenity for the local community.</p>
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		<p>South Dublin County has a physical excess of zoned lands to meet the population and housing targets set out under national and regional policy. Therefore there is no need to re-zone additional lands or zone new additional lands over and above those currently set out under the current 2016 County Development Plan.</p> <p>With regard to traffic concerns and available amenities, both the Tallaght LAP and the Draft Plan provide for significant policies and objectives that places great emphasis on delivering growth in tandem with the physical and social infrastructure which includes for public open space. In this regard, it is noted that a Social Infrastructure Audit (SIA) was carried out to inform the LAP. The SIA examined the availability and capacity of existing social infrastructure facilities in Tallaght, determined future requirements and made recommendations based on anticipated population growth</p> <p>With respect to the context set out above, it is considered that both the Tallaght Town Centre LAP and the Draft Plan allows for the planned and sustainable development of Tallaght Town Centre and Neighbourhood.</p> <p><b>CE Recommendation:</b></p> <p>No Change to Draft Plan</p>
SD-C195-52 Edward Fox	The submission supports Table 10 of the Draft Plan, which identifies a future population growth of 1,953 (11% of the county's growth) within the defined area of Templeogue, Walkinstown, Rathfarnham and Firhouse within which the subject site (21hectares of zoned lands at Kilmashogue, Dublin 16) is the largest land capacity site.	<p><b>CE Response:</b></p> <p>The welcoming of support for the future population growth allocation within the defined area of Templeogue, Walkinstown, Rathfarnham and Firhouse is noted.</p> <p>In line with the recommendations of the Office of the Planning Regulator it should be noted that the Housing Demand figure has been revised to align with the 6-year timeframe of the Development Plan so that the revised figures now provide for targets and housing demand from August 2022 to Q3 2028.</p>

		<p>Therefore, construction activity and estimated delivery up to the Plan coming into effect of 1,240 units is now provided for in the figures. This has reduced the housing demand figures for the plan period in Table 7 from 17,817 to 15,576 units. Please refer to Appendix 1 for further details.</p> <p>It should be further noted that in line with the reduction in the housing demand figure to reflect the six-year period of the Plan, the overall land availability within the County has been projected to reduce up to August 2022. The resulting analysis and view of housing capacity of existing undeveloped zoned land in South Dublin County remains as set out in the Draft Plan and there is no requirement to zone additional land to serve the needs of population and housing targets set by the Ministerial Guidelines and the NPF Roadmap.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<p><a href="#">SD-C195-128 Contorus Ltd</a></p>	<p>The submission seeks to rezone approximately 1.6 hectares of lands located in-between the Old Bawn Road, Bohernabreena Road and the Kiltipper Road.</p> <p>The submission seeks to rezone Objective HA - “To protect and enhance the outstanding natural character and amenity of the Liffey Valley, Dodder Valley and Dublin Mountains areas” to Objective RES-N - “To provide for new residential communities in accordance with approved area plans” and is proposing a land transfer for amenity lands on both sides of the Rivier Dodder to create a high quality linear riverside park at this location that would form part of the overall Dodder Valley park.</p> <p>The submission sets out a planning justification for the proposal submitted to include the following:</p> <ul style="list-style-type: none"> <li>• Access to principal transport corridors and local centre;</li> </ul>	<p><b>CE Response:</b></p> <p>The submission requests the rezoning of 1.6 hectares of the subject lands to RES-N to provide for high density residential units. The Core Strategy and Settlement Strategy in Chapter 2 sets out population and housing figures which must be consistent with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) as required under the Planning and Development Act 2000 (As Amended). South Dublin County is anticipated to grow by 46,518 persons with the housing target for the County, as set by Ministerial Guidelines and the NPF Road Map, being 17,817 homes up to 2028. Chapter 2 also confirms that the County has enough land for a further 10,470 units (79%) above the net household need and therefore there is no need to re-zone additional lands or zone new additional lands over and above those currently set out under the current 2016 County Development Plan.</p>

	<ul style="list-style-type: none"> <li>• Strategically located to achieve a consolidated self-sustaining community in the area;</li> <li>• Delivery of an appropriate quantum of residential development,</li> <li>• Allow for increase of the urban density within residential areas;</li> <li>• Fully serviced in terms of road, water, wastewater and utility infrastructure and therefore should be considered a Tier 1 under the NPF;</li> <li>• Consistent with the NPF/RSES target of compact and smart growth;</li> <li>• Supports and would provide for a stronger Local Centre offering new housing in combination with the existing Old Mill Bar/Restaurant and retail units and Old Mill Centre;</li> <li>• Consistent with CS1 objective 1.</li> </ul> <p>The submission also puts forward a proposal for a potential land transfer / riverside park. It is submitted that the landowner would be open to transfer approximately 2.7 hectares of lands at and around the Old Mill Bar/Restaurant to South Dublin County Council should the lands subject of this submission be re-zoned RES-N.</p>	<p>Having regard to above figures set out in the Core Strategy and the current excess of zoned land, without the need for further zoning, it is considered that there is sufficient flexibility to meet the household requirements for 2031 and potentially up to 2040. The revised target figures in response to the OPR recommendations, set out separately under the response to the OPR, do not impact on the excess land capacity available to meet the revised targets. Therefore, to re-zone or zone new additional lands over and above those currently set out in the Draft Plan would be contrary to National and Regional planning policy.</p> <p>In regard to the density put forward it should be noted that the Draft Plan includes significant policy on building height and density. A higher density at this location would be at variance with the policies and objectives set out in the Draft in particular Policy CS11: Rural Areas and CS11 SLO 1 which seek to restrict the spread of dwellings in the Dodder Valley 'HA-DV' zone and restrict development to low density, 1 or 2 storey residential.</p> <p>The subject lands are a visually and environmentally sensitive site that is zoned 'HA' (High Amenity - Liffey Valley, Dodder Valley and Dublin Mountains). Furthermore, the Dodder Valley is a proposed Natural Heritage Area (pNHA) and Policy NCBH4 and associated objectives of the Draft Plan relate to the protection of same.</p> <p>NCBH8 Objective 1 specifically refers to the restriction of <i>'development within areas designated with Zoning Objective 'HA – DV' (To protect and enhance the outstanding character and amenity of the Dodder Valley) and ensure that new development; - does not significantly negatively impact on cultural heritage assets, on sensitive habitats, species, and ecosystem services, - is related to the area's amenity potential, - is designed and sited to minimise environmental and visual impacts, - and enhances the County's green infrastructure network'</i>.</p> <p>Furthermore, NCBH8 Objective 5 specifically seeks to <i>'protect the upper Dodder Valley from Old Bawn Bridge to Fort Bridge as an</i></p>
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		<p><i>ecological network free from intrusive lighting, facilitating the protection of light-sensitive species availing of the river corridor, and providing an appropriate urban/rural transition experience for all.</i> Therefore, it is considered that the provision of housing in the HA-DV zoning would be at variance with overarching policies and objectives relating to the protection of the Dodder Valley.</p> <p>With respect to the proposal for a potential land transfer for a riverside/linear park along the River Dodder, it is indicated that this is predicated on a rezoning to RES-N. As outlined above, a rezoning is not justified for the reasons outlined. Furthermore, in relation to open space, it is noted the Parks and Open Space Strategy 2021 provides the basis for the upgrade, provision, management and maintenance of publicly managed parks and open spaces, complementing the Green Infrastructure Strategy. It is also noted that Draft Plan has a range of policies and objectives related to the provision of Parks and Public Open Space.</p> <p>Any further off-road extension to the Dodder Valley Greenway will go through an independent process of assessment to the Development Plan. In this regard it should be noted that a collaborative project has been undertaken with Dun Laoghaire Rathdown County Council, Dublin City Council and the National Transport Authority for over 17km of the Dodder Greenway providing an integrated pedestrian and cycle route from the quays in Dublin City Centre to Glenasmole in the foothills of the Dublin Mountains. This underwent public consultation and a rigorous environmental and design approach in collaboration with the other authorities.</p> <p>Having regard to the context set out above and the over capacity of existing zoned lands, it is not appropriate or justified to rezone the subjects to RES-N.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan</p>
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SD-C195-133 CAIRN Plc	Concerns are raised in the submissions that the allocation of 5,385 units to Clondalkin, Clonburris and Grangecastle in the Plan Period as set out in the Core Strategy Table 10 might be misinterpreted in the context of Clonburris SDZ. The submission indicates that Cairn project that circa 4,000 units could be delivered by 2026 and that by 2028 could amount to some 7,000 units.	<b>CE Response:</b>
SD-C195-113 CAIRN Plc		The issues raised in the submission are noted.
SD-C195-226 Clonburris Infrastructure	The submissions highlights commitments made in respect to the delivery of infrastructure and units in accordance with URDF. The submissions request confirmation that there will be no barriers to further development occurring once the first c.4,000-4,385 no. units have been built at Clonburris, subject to the Planning Scheme and phasing requirements and that this should be made explicit in the Development Plan. It is submitted that Table 10 be amended to include a note as follows: The delivery of units in the Clonburris SDZ will be prioritised and that the Core Strategy allocation for Clonburris may be brought forward, if required.	The Core Strategy has allocated growth based on an estimated year on year unit delivery rate within each Neighbourhood Area which ensures compliance with National and Regional population projections.
	While the submissions support the overall recognition of the key role Clonburris will play in the delivery of the housing targets for the County, it is submitted that of equal importance is that the adopted County Plan does not artificially constrain the sustainable development of the SDZ of Clonburris, which is to receive significant public funding through the URDF.	Consideration was also given to ensuring that the delivery of housing to meet the needs of current and future population in line with national targets during the course of the plan period can be sustainably achieved. In this regard the balance between the deliverability of units and avoiding an overly rigid identification of individual capacity lands forms a key part of the Core Strategy. The approach taken considers the need to promote compact growth in a balanced way within each neighbourhood area according to its role and function within the settlement hierarchy. The plan prioritises a level of growth of undeveloped land with a focus on strategic development areas, such as Clonburris, identified under the MASP which amounts in total to 71% of the county's unit allocation.
	It is submitted that the following wording be inserted into the Chapter 2, 2.6 Core Strategy, Section 2.6.7: Monitoring of Growth/ Active Land Management: "... However, anticipating the market and delivery of specific sites is not an exact science. In this regard, a degree of flexibility has been built into the distribution of the housing and population targets, in line with national and regional policy, to ensure an adequate supply to meet demand. This flexibility requires close monitoring of housing delivery, taking account of the function of each settlement. In the event that development occurs on	Chapter 2 Table 10 provides for a unit allocation of 5,385 units over the plan period (30% of the County's overall growth) to the neighbourhood area of Clondalkin, Clonburris, Grangecastle. It is worth noting that past housing completions for similar type development lands at the height of the economic boom in the early to mid-2000's provided for the delivery of c. 3,400 units per year within the entire County. While new construction techniques may potentially result in an increased supply/delivery of housing completions it is considered that the allocation for this neighbourhood area is appropriate.
		While the above should be noted, where it is found that delivery rates are exceeding the allocation for a particular neighbourhood area the plan provides flexibility under policy CS3 Objective 3.



	<p>appropriately zoned sites more quickly than anticipated in the Core Strategy, this will generally be welcomed, subject to compliance with all normal planning policy requirements.”</p> <p>It is also submitted that the planning application granted by SDCC under Reg. Ref. SDZ20A/0021 to Clonburris Infrastructure Ltd (CIL) is a significant first step in enabling the commencement of development at Clonburris.</p>	<p>This provides for the Council to consider the re-distribution of housing population figures within the neighbourhood areas where the applicant must demonstrate to the Planning Authority that the proposal is aligned with the overall growth target for the County, with any necessary investment in infrastructure and with the provision of employment together with supporting amenities and services. It noted that recommendations have been made that specifically relate to CS Objective 3 and as a result the objective has been strengthened further by including a reference to ensuring the totality of planning population/housing growth is aligned with the overall growth target for the County and that such development is aligned with investment in infrastructure and the provision of employment together with supporting amenities and services. See recommended changes outlined in the response to the OPR submission at the beginning of this report (SD-195-227) with regard to CS3 Objective 3.</p> <p>Should a situation arise whereby housing delivery in Clonburris was set to exceed the overall housing allocation for this Neighborhood, those planning applications would need to ensure compliance with the phasing requirements set out in the SDZ to demonstrate that all necessary social and community infrastructure was being provided in tandem with new homes.</p> <p>The Council will monitor the delivery of housing units to ensure general compliance with the Core Strategy and housing supply targets for the County and to inform the redistribution potential outlined above. The Core Strategy figures for each neighbourhood area serve as a benchmark for monitoring to ensure compliance with National and Regional figures.</p> <p>In this context it is not considered necessary to include specific wording relating to the Clondalkin, Clonburris, Grangecastle neighbourhood area. The provisions currently set out in the plan provide sufficient flexibility to facilitate a level of growth which may exceed the allocated units for a particular neighbourhood as</p>
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		<p>identified in the Core Strategy, while still ensuring compliance with National and Regional figures.</p> <p><b>CE Recommendation:</b></p> <p>No Change to Draft Plan.</p>
<p><a href="#">SD-C195-205 Land Development Agency</a></p>	<p>The submission outlines the role of the LDA to enable and unlock land to provide more affordable housing nationwide with a key focus on delivering compact urban and sustainable growth by optimising relevant public lands.</p> <p>The LDA refers in their submission to state-owned sites in the west Dublin area in Inchicore, Dublin 8 (CIE, ESB &amp; OPW), capable of delivering significant housing considers that this area relates well to the wider area and catalyse the rejuvenation of this area using state lands linked to a wider urban regeneration framework approach.</p> <p>The LDA highlights their support Policy CS1, CS4, CS7 and vision for the regeneration of the Naas Road/Ballymount area and City Edge Project.</p> <p>The LDA request a number of amendments to existing objectives in Chapter 2 as well as new additional objectives in order to ensure the delivery of state-owned lands (facilitated by the LDA) with regard to strategic development areas, urban regeneration lands and active land management to include the following:</p> <p><u>New CS1 Objective 4 to read as follows:</u></p> <ul style="list-style-type: none"> <li>• <b>New CS1 Objective 4 : “It is an objective of the Council to support and work with the Land Development Agency (LDA) in the planning, co-ordination and development of strategic land banks particularly relevant lands in state ownership, in order to achieve compact growth, sustainable development and urban regeneration.”</b></li> </ul>	<p>The support and issues raised by the Land Development Agency (LDA) is noted.</p> <p>The submission seeks the addition of one new objective and a series of amendments to CS1 Objective 2; CS1 Objective 3; Policy CS2; CS2 Objective 1; CS2 Objective 2; Policy CS4; CS4 Objective 2; CS4 Objective; and CS7 Objective 3.</p> <p>The Council recognises the LDA’s role and it is important that this is acknowledged within the Development Plan in order to highlight the importance in driving the delivery of sustainable and affordable housing and in supporting the Council in progressing the optimal redevelopment of strategic development areas and other areas in delivering compact and sustainable growth.</p> <p>Given the number of amendments, it is considered more appropriate to include for the provision of an objective in the Draft Pan that reinforces the Councils commitment to engaging, supporting, and working with the LDA.</p> <p>It is therefore proposed that a new objective be included as follows to read:</p> <p><b>New CS 1 Objective 4:</b> <i>To engage with the Land Development Agency (LDA) in the planning and co-ordination of strategic land banks to achieve compact growth, sustainable development and urban regeneration.</i></p> <p><b>Recommendation</b></p> <p><b>Insert a new objective under Policy CS1 to read:</b></p>

	<p><u>Amendment of CS1 Objective 2 and CS1 Objective 3 to read as follows:</u></p> <p>Amended CS1 Objective 2: “To support continued collaboration between infrastructure providers, state agencies <b>such as the LDA</b>, and local authorities to inform cross sectoral investment plans and capital spending plans to accelerate the development of strategic development areas and secure the best use of public lands in the Dublin Metropolitan Area – consistent with RPO 5.1.”</p> <p>Amended CS1 Objective 3: “To seek funding <b>in cooperation with state agencies such as the LDA</b> from appropriate sources, including central government funding mechanisms, to secure the delivery of National Strategic Outcomes for the strategic development areas under the National Planning Framework.”</p> <p><u>Amendment of Policy CS2, CS2 Objective 1 and CS2 Objective 2 to read as follows:</u></p> <p>Amended Policy CS2: “Deliver a development framework for the regeneration of the Naas Road lands in conjunction with Dublin City Council, <b>and state agencies such as the LDA</b>, which underpins the strategic aims of the National Planning Framework and Regional Spatial and Economic Strategy.”</p> <p>Amended CS2 Objective 1: “To prepare a Local Area Plan or other appropriate mechanism for the zoned Regeneration (REGEN) lands at Naas Road/Ballymount to include the Local Centre zoning (LC) at Walkinstown. The LAP or equivalent will provide a framework for the sequential and phased development of the lands, <b>including state-owned sites</b>, integrating sustainable transport, land use and blue and green infrastructure. The spatial planning of the area will be informed by the Naas Road Framework until such time as a Statutory Plan is in place.”</p>	<p><b>CS 1 Objective 4:</b> <i>To engage with the Land Development Agency (LDA) in the planning and co-ordination of strategic land banks to achieve compact growth, sustainable development and urban regeneration.</i></p>
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	<p>Amended CS2 Objective 2: “To facilitate a co-ordinated approach and vision to any future sustainable development of the Naas Road Framework area in consultation with Dublin City Council, <b>state agencies such as the LDA</b> and all relevant stakeholders including the local community, and ensure that the needs of the existing and new community will be met, and the provision of necessary community and physical infrastructure is delivered in tandem with any new development.”</p> <p><u>Amendments to Policy CS4, CS4 Objective 2 and CS4 Objective 4 to read as follows:</u></p> <p>Amended Policy CS4: “Facilitate the re-use and regeneration of vacant sites, <b>state-owned sites</b>, and landbanks through various measures to promote compact urban growth in line with the Core Strategy.”</p> <p>Amended CS4 Objective 2: “To promote the delivery of residential development through active land management measures and a co-ordinated planned approach <b>in cooperation with state agencies such as the LDA</b> to developing appropriately zoned lands at key locations, including regeneration areas, vacant sites, <b>state-owned sites</b>, and under-utilised areas.”</p> <p>Amended CS4 Objective 4: “To secure funding <b>in cooperation with state agencies such as the LDA</b> from appropriate sources, including central government funding mechanisms, to secure the delivery of National Strategic Outcomes under the National Planning Framework”</p> <p><u>Amendment of CS7 Objective 3 to reads follows:</u></p> <p>Amended CS7 Objective 3: “To promote and support the development of undeveloped infill <b>sites</b>, and brownfield <del>zoned</del> lands, <b>and state-owned sites</b>, and to promote pre-application consultation in accordance with Section 247 of the</p>	
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	<p>Planning and Development Act, 2000 (as amended) (consistent with RPO 4.3).”</p>	
<p>SD-C195-154 Tallaght Community Council</p> <p>SD-C195-222 Tallaght Community Council</p>	<p>The submissions highlight a number of issues pertaining to Chapter 2 Core Strategy. Issues raised have been broken down into the following headings:</p> <ul style="list-style-type: none"> <li>• <b>Population and Growth</b></li> <li>• <b>Core Strategy</b></li> <li>• <b>Infill development</b></li> <li>• <b>SHDs</b></li> <li>• <b>Residential Intensification</b></li> <li>• <b>Monitoring Population and Housing Growth</b></li> <li>• <b>Strategic Long Term Development Areas (SDAs)</b></li> <li>• <b>Policy CS5: Lands for Employment</b></li> <li>• <b>Table 13: RSES Settlement Hierarchy relating to South Dublin County Council</b></li> <li>• <b>Settlement Strategy - Strategic Planning Principles</b></li> <li>• <b>Key Urban Centres within Dublin City and Suburbs - Tallaght</b></li> <li>• <b>Infrastructure Assessment</b></li> <li>• <b>Fire Storage/Safety</b></li> </ul> <p><b><u>Population and Growth</u></b></p> <p>The submission highlights the following issues with regard to population and growth:</p> <ol style="list-style-type: none"> <li>1. The submission suggests there are inaccurate population growth figures in relation to Tallaght. It is pointed out that the TTCLAP contains population targets significantly higher than the NPF and therefore suggests that this inaccurate and requests this to be corrected.</li> <li>2. The submission requests the inclusion of an SLO that limits the percentage of growth in Tallaght. It is considered that while the Draft Plan indicates that 94% of the proposed housing and thus population is anticipated to occur within and contiguous to the Dublin City and</li> </ol>	<p><b>CE Response:</b></p> <p>The issues raised in the submission are noted and are addressed under the following headings:</p> <ul style="list-style-type: none"> <li>• <b>Population and Growth</b></li> <li>• <b>Core Strategy</b></li> <li>• <b>Infill development</b></li> <li>• <b>SHDs</b></li> <li>• <b>Residential Intensification</b></li> <li>• <b>Monitoring Population and Housing Growth</b></li> <li>• <b>Strategic Long Term Development Areas (SDAs)</b></li> <li>• <b>Policy CS5: Lands for Employment</b></li> <li>• <b>Table 13: RSES Settlement Hierarchy relating to South Dublin County Council</b></li> <li>• <b>Settlement Strategy - Strategic Planning Principles</b></li> <li>• <b>Key Urban Centres within Dublin City and Suburbs - Tallaght</b></li> <li>• <b>Infrastructure Assessment</b></li> <li>• <b>Fire Storage/Safety</b></li> </ul> <p><b><u>Population and Growth</u></b></p> <ol style="list-style-type: none"> <li>1. The Draft Plan’s Core Strategy and Settlement Strategy in Chapter 2 sets out population and housing figures which must be consistent with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) as required under the Planning and Development Act 2000 (as amended). The Tallaght Town Centre Local Area Plan (TTCLAP), as per Section 1.0, has a statutory 6 year timeframe, however its full build out, which includes significant regeneration and intensification of brownfield lands and changing character areas, is envisaged over a longer period of up to 20 years. In Section 2.7.1 Dublin City and</li> </ol>

	<p>Suburbs settlement boundary and within this, 71% of the growth will take place in the MASP identified growth areas such as Tallaght, Clonburris, Naas Road, Adamstown, and Citywest, it submitted that this statement with respect to Tallaght is too general and a specific percentage for Tallaght is needed. It is also requested that the population figures Tallaght (County town) to be added in a separate line on table 2 and 6.</p> <p>3. The submission supplied a detailed Appendix specifying the population and growth figures for Tallaght. The submission argues that the predictions for Tallaght are over dense, do not qualify as compact growth and that there is a negative impact on the environment arising from such influx of density and request a variation of the LAP in order to address the same.</p>	<p>Suburbs of the Draft Plan, with regard to designated 'Regeneration Areas', it states: <i>The Cookstown and Broomhill Industrial estates in Tallaght are designated with the regeneration Zoning Objective 'REGEN' (to facilitate enterprise and/or residential led regeneration subject to a development framework or plan for the area incorporating phasing and infrastructure delivery). The delivery of these areas may require a longer lead in time as described in the Core Strategy above.</i> It also states under Section 2.7.1 that significant areas of lands designated as Strategic Development Areas have been excluded from the land capacity over the Development Plan period except where it is considered a percentage of development can occur within that timeframe. Of the total capacity for the SDA lands, approximately 150 ha providing for more than 7,500 units has been identified as being deliverable over the Development Plan period and is included in the land capacity figures in Table 9. This figure for SDA lands is informed by an understanding of the pipeline and potential for housing delivery on Council owned lands, historical trends of housing delivery on SDA lands within South Dublin and by delivery of similarly designated sites within the region. It is considered that the figure set out for the Tallaght Neighborhood Area which includes lands within the Tallaght Town Centre Local Area Plan is appropriate.</p> <p>2. Table 10: Core Strategy Table 2022 – 2028 allocates Tallaght with a total housing and unit growth of 2000 units which is 11% of the County's overall growth. This growth is considered reasonable and the inclusion of an SLO to limit the percentage is considered to be inappropriate and at variance with National and Regional Legislation.</p> <p>The Tallaght neighbourhood forms part of the Dublin City and Suburbs Settlement as set out in in Tables 2 and 6, therefore, it is not considered appropriate to include Tallaght separately within Tables 2 and 6.</p> <p>3. The Tallaght Town Centre Local Area Plan was adopted in June 2020 and promotes the sustainable development of the</p>
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	<p><b><u>Core Strategy</u></b></p> <p>The submission requests the inclusion a new SLO for Mooreenaruggan /Garranstown/Whitehall &amp; Newlands townlands. It is submitted that these lands need be retained as agricultural lands and it is envisaged that they could be developed as horticultural centre for the local community, provision of polytunnels and greenhouse etc.</p> <p><b><u>Infill Development</u></b></p> <p>The submission queries the reason as why the objective '<i>To support a well-designed infill development</i>' is missing for Tallaght Village and it is included within the objectives for the Self-Sustaining Growth Towns.</p>	<p>LAP lands by facilitating a more intensive land-uses in REGEN zoned land to accommodate higher density residential and employment uses. It is noted that while the LAP has a statutory 6-year timeframe, its full build out, which includes significant regeneration and intensification of brownfield lands and changing character areas, is envisaged over a longer period of up to 20 years. As such, a variation of the LAP is considered inappropriate given the strategic long-term outlook of the Plan.</p> <p><b><u>Core Strategy</u></b></p> <p>It is noted that the subject lands are currently zoned Rural (RU) – '<i>To protect and improve rural amenity and to provide for the development of agriculture</i>'. The zoning of the subject lands as objective Rural RU restricts the development of the area from inappropriate land uses and accurately reflects the existing greenfield nature of the lands. Furthermore, such uses permitted in principle already exist under this zoning objective similar to what is requested and include Agriculture, Allotments, Cemetery ...Rural Industry-Food and Community Centre use if Open for Consideration. It is therefore considered that the 'RU' land use zoning is generally adequate to protect this landscape character and provide for appropriate uses permitted under this zoning without the need of an SLO.</p> <p><b><u>Infill development</u></b></p> <p>With regard to the design and development of Neighbourhoods, such as Tallaght, it is policy of the Draft Plan to promote the creation of successful and sustainable neighbourhoods through the application of key design principles to ensure the delivery of attractive, connected, and well-functioning places to live, work, visit, socialise and invest in throughout the County. South Dublin County has grown around the villages such as Tallaght and it is recognised that it has a unique character and offers a diverse range of professional and retail services. Policy QDP3: Neighbourhood Context and its associated objectives support and</p>
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		<p>facilitate proposals which contribute in a positive manner to the character and setting of an area. It noted that Tallaght village is an Architectural Conservation Area (ACA) and QDP3 Objective 2 is of particular note which seeks to protect and conserve the special character of the historic core of the villages and ensure that a full understanding of the archaeological, architectural, urban design and landscape heritage of each village informs the design approach to new development, infrastructure and renewal, recognising the particular character and context in Architectural Conservation Areas (ACAs).</p> <p>The Draft Plan provides for specific policies, of which the stated objective in the submission is included, to promote and encourage the growth of Newcastle, Rathcoole and Saggart as they are settlements separate to the Dublin City and Suburbs boundary.</p> <p>Tallaght is located within the Dublin City and Suburbs and CS6 Objective 2 seeks to promote compact growth by supporting high quality infill development in existing urban built-up areas by achieving a target of at least 50% of all new homes to be located within or contiguous to the built-up area of Dublin City and Suburbs.</p> <p>Notwithstanding this, there is an overarching objective H13 Objective 2 under which infill development in Tallaght will be governed that states <i>“To maintain and consolidate the County’s existing housing stock through the consideration of applications for housing subdivision, backland development and infill development on large sites in established areas, subject to appropriate safeguards and standards identified in Chapter 13 Implementation and Monitoring.</i></p> <p>“Moreover, within the Tallaght TC LAP, Objective IS 1 of the LAP places a strong emphasis on encouraging infill opportunities adjacent to compatible existing uses and ensuring better use of under-utilised lands.</p>
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	<p><b><u>SHDs</u></b></p> <p>The submission indicates that a significant number of SHD units have been granted permission in South Dublin and considers that these units are located mostly in Tallaght and Citywest. It is submitted that 30% of SHDs are in Tallaght REGEN lands and it is submitted that only 11% of all SHDs in the County have begun. It is submitted that this does not align with the growth plans for the county.</p> <p><b><u>Residential Intensification</u></b></p> <p>The submission recognises how at a neighbourhood level there is an aim to link population in close proximity to employment, recreation, and essential amenities in order to reduce car dependency. In this regard, the submission queries the provision of employment or small green open space in existing neighbourhoods or REGEN lands to balance high rates of residential intensification.</p>	<p>Therefore, the Draft Plan sets out adequate provisions for well-designed infill development in which Tallaght will be subject to.</p> <p><b><u>SHDs</u></b></p> <p>It is recognised by the Council that larger developments (SHDs) comprise a significant element of permitted units throughout the County and delivery has been limited to certain neighbourhood areas to date. It is an objective of the Draft Plan to carry out monitoring and in recognition of this, a flexible approach to provide for delivery has been incorporated into the Draft Plan through Objective CS3 Objective 3. See recommended changes outlined in the response to the OPR submission at the beginning of this report (SD-195-227) with regard to CS3 Objective 3 as noted above. This will ensure an adequate supply of suitable lands come forward to complement the Council's supply pipeline and achieve the housing supply targets.</p> <p><b><u>Residential Intensification</u></b></p> <p>The Tallaght LAP promotes the sustainable development of the LAP lands by facilitating a more intensive land-uses in REGEN zoned land to accommodate higher density residential and employment uses. The LAP sets out to provide a connected neighbourhood in terms of land use, building frontage, access and movement, green infrastructure and building height.</p> <p>Given the extent and quantum of the lands zoned specifically for employment and to facilitate continued economic development and employment growth in the County over the Plan period, there is an enhanced need maintain employment lands for such purpose. It should also be noted that both the Tallaght LAP and the Draft Plan provide for significant policies and objectives that place a significant emphasis on delivering growth in tandem with the physical and social infrastructure which includes for public open space The Draft Plan provides for the appropriate standards</p>
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	<p><b><u>Monitoring Population and Housing Growth</u></b></p> <ol style="list-style-type: none"> <li>1. The submission requests clarity in respect of CS3 Objective 3 on the re-distribution of housing population figures and accompanying controls allowable within settlements.</li> <li>2. The submission seeks the location of the infill housing sites as referenced in CS3 Objective 4.</li> </ol>	<p>for open space provision and this will form the policy under which development management decisions will be made.</p> <p><b><u>Monitoring Population and Housing Growth</u></b></p> <ol style="list-style-type: none"> <li>1. With respect to CS3 Objective 3, the Draft Plan sets out housing targets for each neighbourhood area. In line with recommendations of submission SD-195-227 Office of the Planning Regulator (OPR), an examination has been carried out of various aspects of the Draft Plan. In particular, recommendations have been made that specifically related to CS Objective 3 and as a result the objective has been strengthened further by including reference to ensuring the totality of planning population/housing growth is aligned with the overall growth target for the County and that such development is aligned with investment in infrastructure and the provision of employment together with supporting amenities and services. See recommended changes outlined in the response to the OPR submission at the beginning of this report (SD-195-227). In recognising that some sites may come forward before others and having regard to the role of the market in delivering housing, options to transfer a portion of the allocated units from one neighbourhood area to another are provided for under CS3 Objective 3. In this regard the Council will monitor the delivery of housing units to ensure compliance with the Core Strategy and housing supply targets for the County and to inform the redistribution potential as required. A site must be greater than 0.25ha, with potential to exceed targets for the settlement to come within the scope of the objective. In order for a transfer to be considered feasible it must be demonstrated that proposal is aligned with the overall growth target for the County, any necessary investment in infrastructure and the provision of employment together with supporting amenities and services.</li> </ol>
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	<p><b><u>Strategic Long Term Development Areas (SDAs)</u></b></p> <ol style="list-style-type: none"> <li>1. The submission notes the number of units identified in the Plan for Tallaght Regen Land and compares them to Adamstown total number of units and highlights they are significantly bigger. The submission questions if Cookstown /Airton is planned to be twice as dense as Adamstown as identified in Table 8 of Draft Plan.</li> <li>2. The submission requests clarity on infill construction within the areas identified in Table 8.</li> </ol>	<ol style="list-style-type: none"> <li>2. With regard to CS3 Objective 4, the Land Capacity Audit which informs the Core Strategy, comprised a comprehensive review and analysis to calculate the potential yield of undeveloped land (RES, RES-N, TC, REGEN, VC, DC, LC and SDZ) zoned in the 2016 - 2022 County Development Plan. The Land Capacity also comprised of smaller infill sites of approximately 0.5 hectares. This Audit was built upon with a detailed Infrastructural Audit. A Neighbourhood Approach has been applied to the Draft Plan with the plan area subdivided in to the seven Neighbourhood areas and the findings of these assessments outlined above are detailed in Appendix 2 Part 1. The databases will be built upon through the lifetime of the plan through live data.</li> </ol> <p><b><u>Strategic Long Term Development Areas (SDAs)</u></b></p> <p>Table 8 details the Total Land Capacity within Strategic Development Areas. Of this, Tallaght Local Area Plan (Regen Lands) Overall Unit Capacity allows for 8400-11,144 which aligns with the Tallaght LAP. The Tallaght LAP provides for, in the longer term, over a period of up to 20 years, an envisaged full regeneration of the LAP lands which could deliver between 8,410 to 11,090 new homes, to achieve a population of up to 34,000 people within the LAP lands. It is noted that significant areas of the lands identified in Table 8 have been excluded from the land capacity over the Development Plan period except where it is considered a percentage of development can occur within that timeframe. Of the total capacity for the SDA lands, approximately 150 ha providing for more than 7,500 units has been identified as being deliverable over the Development Plan period and is included in the land capacity figures in Table 9. This figure for SDA lands is informed by an understanding of the pipeline and potential for housing delivery on Council owned lands, historical trends of housing delivery on SDA lands within South Dublin and</p>
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	<p><b><u>Policy CS5: Lands for Employment</u></b></p> <p>The submission puts forward the following with regard to CS5 Objective 1 and requests the wording is changed from ‘<i>To focus high intensity employment generating uses around high-capacity public transport nodes.</i>’</p> <p>To  <b>To focus high intensity employment generating uses around existing</b> high-capacity public transport nodes</p> <p>Or request that the objective specifies ‘along the Luas red line’.</p>	<p>through the delivery of similarly designated sites within the region. Therefore, the total amount for Tallaght is the long-term vision.</p> <p>With regard to Infill construction and as referred to above under ‘Infill’, the Draft Plan envisages that the development of the wider settlement area for Dublin City and Suburbs, in which the areas identified in Table 8 are located, will largely be provided for through infill and brownfield growth. There are a number of policies and objectives within the Draft Plan that promote and support the development of undeveloped infill which include the following: CS3 Objective 4; CS6 Objective 2; CS6 Objective 3; and CS7 Objective 3.</p> <p><b><u>Policy CS5: Lands for Employment</u></b></p> <p>The need to focus people intensive employment around existing and planned high capacity transport nodes is recognised in the plan, in particular the Luas Lines. The existing Luas lines to Tallaght and Saggart provide excellent access to a high quality public transport link for people living in and working in South Dublin. The Council will work with the NTA to assess the need and opportunity to increase the capacity on these existing lines to provide an increased service in line with a growing population and need. Furthermore SM3 Objective 20 seeks to ‘<i>support additional capacity on the Luas Red Line, to service the intensification of development in Tallaght and Fortunestown and the future development of the Naas Road lands.</i>’ And EDE4 Objective 4 aims to direct people intensive enterprise and employment uses into appropriately zoned lands within approximately 500 metres of a high frequency urban bus service and/or within 1000 metres walking distance of high-capacity transport stops such as the train and Luas. It is therefore considered that there is already focus within the plan to direct employment generating uses around the Luas Red Line where appropriate.</p>
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	<p><b><u>Table 13: RSES Settlement Hierarchy relating to South Dublin County Council</u></b></p> <p>The submission questions Table 13 and seeks clarification if this lists the order of timed development i.e. Tallaght first.</p> <p><b><u>Settlement Strategy - Strategic Planning Principles</u></b></p> <p>The submission questions CS6 Objective 3 and queries if the 50% of all planned infill new homes, as stated in the objective, are to be located in Tallaght.</p> <p><b><u>Key Urban Centres within Dublin City and Suburbs - Tallaght</u></b></p>	<p><b><u>Table 13: RSES Settlement Hierarchy relating to South Dublin County Council</u></b></p> <p>Table 13 'RSES Settlement Hierarchy relating to South Dublin County Council' of the Draft Plan details all the South Dublin Settlements which align with National and Regional Planning Policy. The settlement typologies in column two, are listed in accordance with the principles of sustainable development, and NPO 3b of the NPF; future growth within the County will be prioritised in the Dublin City and Suburbs area first to encourage population growth close to existing and planned employment, services, key transport infrastructure and local amenities. The list of settlements detailed for South Dublin are not listed in order of timed development. The development of the neighbourhoods will be closely monitored through the policies and objectives set out in the Draft Plan.</p> <p><b><u>Settlement Strategy - Strategic Planning Principles</u></b></p> <p>CS6 Objective 2 states that 'to promote compact growth and to support high quality infill development in existing urban built-up areas by achieving a target of at least 50% of all new homes to be located within or contiguous to the built-up area of Dublin City and Suburbs'. As noted above, Tallaght is included in the Dublin City and Suburbs Settlement. The settlements which meet this classification but are separate to the Dublin City and Suburbs boundary are: Newcastle, Rathcoole, Saggart. Therefore, the 50% target is attributed to the entire settlement of Dublin City and Suburbs. Chapter 2 Table 13 'RSES Settlement Hierarchy relating to South Dublin County Council' of the Draft Plan details all Settlements within South Dublin included in the Dublin City and Suburbs Settlement.</p> <p><b><u>Key Urban Centres within Dublin City and Suburbs - Tallaght</u></b></p> <p>It is noted that the Draft Plan already provides for a such a statement under the Chapter 12, Tallaght Neighbourhood on pg.</p>
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	<p>The submission requests the addition of the following text under Tallaght (pg68): <b>“Outside the centre, the area is characterised by generally low-density suburban neighbourhoods based around local neighbourhood centres.”</b></p> <p><b><u>Infrastructure Assessment</u></b></p> <p>The submission is opposed to and objects to the extension of the TTC area by Appendix 2 Part 1 and wants this provision removed (map provided detailing footprint of TCC 3km wide).</p> <p>In addition, the submissions requests that the number of points for MASP area be reduced and suggests 30 for brownfield and 10 for greenfield.</p>	<p>476. The Draft Plan states, ‘<i>Outside of Tallaght Town Centre, the area is characterised by low density suburban neighbourhoods that are based around a network of local retail centres.</i>’ Therefore, it is considered unnecessary to duplicate this statement.</p> <p><b><u>Infrastructure Assessment</u></b></p> <p>The submission is noted. Figure 2 Land Capacity Analysis Map in Appendix 2 Part 1 shows lands zoned REGEN in the Tallaght area and is based on the 2016-2022 County Development Plan zoning maps. This is considered to be an accurate depiction of the extent of the REGEN zoned lands in this area.</p> <p>It is requested that the number of points awarded for MASP areas be reduced. The potential development sites or capacity lands – identified through the Land Capacity Analysis and categorised under the Infrastructural Assessment – were also subject to a Planning Assessment. The Planning Assessment was based on the shared goals identified in the NPF and RSES as National Strategic Outcomes and Regional Strategic Outcomes, namely the achievement and delivery of Compact Growth; and Accessibility, Sustainable Mobility, Climate Action and a transition to a low carbon climate resilient society as follows:</p> <ul style="list-style-type: none"> <li>• A total of 100 marks were awarded to sites located within Tallaght Town Centre LAP OR Specified Area in the RSES i.e. Adamstown SDZ, Clonburriss SDZ, Naas Road Regen Lands, Grangecastle Employment, Kilcarbery.</li> <li>• Potential development sites located within 500m - 1000m of TTC LAP Boundary were awarded 80 marks if brownfield and 60 marks if greenfield.</li> <li>• Potential development sites located with the wider MASP Area in the case of Tallaght were awarded 60 marks if brownfield and 40 marks if greenfield.</li> </ul>
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	<p><b><u>Fire Storage/Safety</u></b></p> <p>The submission queries that adequate fire storage capacity exists within the developments in Tallaght and that reported pressure drops in the area do not impinge on this requirement being met completely and asks if firefight infrastructure exist to combat fires in existing high rise such as Tallaght Town Centre and in future proposed SHD, some of which reach ten stories.</p>	<p>The marking system applied is considered appropriate for assessing potential development sites under the overarching strategic planning policy objectives and national and regional level.</p> <p><b><u>Fire Storage/Safety</u></b></p> <p>The submission is noted. This issues as raised do not fall under the remit of the Development Plan.</p> <p>Application for large scale development are referred to the relevant agencies such as Irish Water through the Development Management Process when applying for such developments. Furthermore, it is noted that the Planning Authority worked in collaboration with Irish Water in developing an Infrastructure Assessment for the Draft Plan which looks at Water Supply. Fire Safety certificates and water pressure are outside the remit of a county wide landuse policy document such as the Development Plan.</p> <p>Having regard to the context set out above and with the Tallaght Local Area Plan provisions in place alongside the provisions set out in the Draft Plan it is considered that there are sufficient policy provisions set out at a Local and County level and they are aligned and appropriately support the sequential growth of Tallaght in a sustainable manner.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan - See recommended changes outlined in the response to the OPR submission at the beginning of this report (SD-195-227) with regard to CS3 Objective 3.</p>
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**Population and Housing Data**

Submission No.	Submission Summary	CE response and recommendation
<p data-bbox="192 248 448 347">SD-C195-64 Saggart Village Residents' Association</p> <p data-bbox="192 427 492 491">SD-C195-251 Cllr Trevor Gilligan PC</p>	<p data-bbox="528 248 1245 384">The submissions raise concerns that the population growth figure for Saggart is underestimated and that the population growth to 3499 projected for 2028 has already been reached.</p> <p data-bbox="528 408 1245 536">The submissions support the recognition in the Draft Plan that the capacity of zoned lands is sufficient but query whether the zoned lands already approved have been underestimated in terms of their population also.</p>	<p data-bbox="1245 248 1433 280"><b>CE Response:</b></p> <p data-bbox="1245 304 1792 336">The issues raised in the submission are noted.</p> <p data-bbox="1245 360 2038 727">The submission indicates a projected population of 3,499 for 2028 in Saggart. It is noted from the outset that this is incorrect and would, upon further investigation, be a typographical error in this section that should be amended. Under 'Saggart – Self-Sustaining Town' the text of the Draft Plan currently reads '<i>The Saggart settlement had a population in 2016 of 3,133 which is targeted to grow by 366 persons (11%) to 3,499 persons by 2028.</i>' (pg70). This text should read the following: '<i>The Saggart settlement had a population in 2016 of 3,133 which is targeted to grow by 398 persons (13%) to 3,531 persons by 2028.</i>' This text is correct and consistent with Table 10: Core Strategy.</p> <p data-bbox="1245 751 2038 1015">It should also be noted that revisions have been made to the housing target of Saggart on foot of the level of development and activity likely on lands to North along Mill Road over the plan period. As a result, Saggart is provided with upward revision to the housing target in Table 10: Core Strategy from 96 units to 165 units over the 6-year lifetime of the plan i.e.,2022-2028. The response to the OPR dealing with this change is set out separately at the beginning of this report for further details.</p> <p data-bbox="1245 1038 1523 1070"><b>CE Recommendation:</b></p> <p data-bbox="1245 1094 2038 1158">Change the typographical error in Chapter 2 Core Strategy, 'Saggart – Self-Sustaining Town' (pg 70) that reads:</p> <p data-bbox="1245 1182 2038 1246">'The Saggart settlement had a population in 2016 of 3,133 which is targeted to grow by 366 persons (11%) to 3,499 persons by 2028.'</p> <p data-bbox="1245 1270 1344 1302">To Read:</p>



		<p>The Saggart settlement had a population in 2016 of 3,133 which is targeted to grow by <b>398 persons (13%) to 3,531 persons</b> by 2028'.</p> <p>And see recommended changes outlined in the response to the OPR submission at the beginning of this report (SD-195-227) and Appendix 1 with regard to Saggart.</p>
<p><a href="#">SD-C195-224 Hooke &amp; MacDonald</a></p>	<p>The submission raises concerns that the Draft Plan for South Dublin County has been drawn up based on flawed projections on demographics and real housing demand and that an insufficient amount of land is planned for rezoning based on this misinformation.</p> <p>The submission highlights a number of issues which it considers to be flawed which include the following:</p> <ul style="list-style-type: none"> <li>• That over half of the 477 hectares of zoned land (excluding SDZs) are likely to remain underdeveloped;</li> <li>• The assumption that all existing zoned lands will be developed for housing;</li> <li>• Need to provide for pent-up demand for housing which is increasing at an alarming rate;</li> <li>• Need for smaller household sizes to reflect the fact that two thirds of the population are now 1, 2 or 3 person households; and</li> <li>• That headroom provision in the draft plan falls short of the required volume.</li> </ul> <p>The submission refers to the rate of construction for apartments in South Dublin and highlights that only 14% of housing stock in South Dublin are apartments. It is submitted that the Draft Plan does not address this with the proposed quantum of zoned lands and that the failure of the draft plan to rectify this, despite the clear need to provide for smaller house sizes, by zoning sufficient lands, is very regrettable.</p>	<p><b>CE Response:</b></p> <p>The issues raised in the submission are noted and dealt with under the following headings:</p> <ul style="list-style-type: none"> <li>• Core Strategy and Land Capacity</li> <li>• Methodology for calculating the housing target</li> <li>• Household Size</li> <li>• Headroom</li> </ul> <p><b>Core Strategy and Land Capacity</b></p> <p>The Core Strategy and Settlement Strategy in Chapter 2 set out population and housing figures and confirms that the County has enough land for a further 10,470 units (79%) above the net household need. Therefore, there is no need to re-zone additional lands or zone new additional lands over and above those currently set out under the current 2016 County Development Plan.</p> <p>Having regard to above figures set out in the Core Strategy and the current excess of zoned land, without the need for further zoning, it is considered that there is sufficient flexibility to meet the household requirements for 2031 and potentially up to 2040. The revised target figures in response to the OPR recommendations, set out separately under the response to the OPR, do not impact on the excess land capacity available to meet the revised targets.</p> <p>Therefore, to re-zone or zone new additional lands over and above those currently set out in the Draft Plan would be contrary to National and Regional planning policy.</p>

	<p>The submission is supported by a detailed report entitled 'Report on Demographics Housing Supply, National Planning Framework and South Dublin Council Development Plan Projections' prepared by Dr Brian Hughes (September 2021).</p>	<p>The Land Capacity Audit, which informs the Core Strategy, comprised a very comprehensive review and analysis to calculate the potential yield of undeveloped land (RES, RES-N, TC, REGEN, VC, DC, LC and SDZ) zoned in the 2016 - 2022 County Development Plan. Zoned land with extant permission not commenced (estimated 6,517 units) has been recognised and factored into the Core Strategy figure. In considering such extant permissions a deliverability analysis has also been carried out and has informed the development of the Core Strategy. In addition, a rigorous Infrastructure Assessment and Social Infrastructure Audit was carried out that built on the initial Land Capacity Analysis. This assessment gathered pertinent data on identified lands in relation to their infrastructural constraints and requirements in order to differentiate between zoned land that is available for development and zoned land that requires significant further investment in services for infrastructure for development to be realised. This identifies the assets in each settlement and opportunities to ensure further growth is provided for in tandem with social and physical infrastructure.</p> <p>The reference to lands remaining zoned in a number of development plans but being undeveloped is noted, The Planning Authority has examined this in detail and is satisfied that the majority of lands to which this applies relate to Adamstown and Clonburris SDZs which are strategic long term lands identified in the RSES and to other LAP areas, including Fortunestown, and for which development is now progressing. Furthermore, it should be noted that other submissions made to this Draft Plan have noted they can deliver housing in such locations and have highlighted the potential to exceed targets. Therefore, it is considered that such development will occur in a sustainable manner over the lifetime of the Plan. Furthermore, it is noted that in the submission made by the Office of the Planning Regulator (OPR), notes how the core strategy has attempted to strike a balance between having an excess of zoned land and being able to deliver new development</p>
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		<p>County which factors in demand from both existing population and future population. The NPF indicates that the average national household size in 2016 of 2.75 persons per household is expected to decline to 2.5 persons by 2040 resulting in an average household size decline of 0.01 persons per year over the 24-year period up to 2040.</p> <p>Thus, the application of a household size across all households in the County of 2.74 is an estimated correlation between increasing housing supply and decreasing household size and it is considered appropriate given South Dublin's higher average household size than the average in the Region. It is assumed that in the medium to long term, the average number of persons in private households will once again decline due to wider demographic trends. As a result, it is expected that the average number of persons in private households in South Dublin will progress towards the 2.75 level seen in the Dublin City Council area by 2028 and as provided for in the NPF and correlates with the Supply Guidelines.</p> <p><b>Headroom</b></p> <p>The RSES, guided by the NPF Roadmap (the Roadmap), has set population projections for the region up to 2026 and 2031 within their Appendix B. In terms of 'Headroom', the Roadmap indicates that an additional 50% growth is already accounted for in the National population targets up to 2026. Thus, the application of 50% growth beyond the Plan period is already accounted for in the targets which the Draft Plan is aligned with.</p> <p>Having regard to the above, it is considered that an evidence-based approach, based on national targets and guidelines, has been provided for in the Draft Plan. This is generally supported by the OPR and EMRA in their submissions to the Draft Plan, subject to a review of the excess of lands zoned in the western towns. The Draft Plan also allows for flexibility within the core strategy under the specific parameters set out in the Plan. It is therefore considered that the Draft Plan provides the appropriate balance</p>
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		<p>between monitoring and promoting the deliverability of the development of lands zoned within the County within the lifetime of the Plan.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan</p>
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Residential Zoning Submission		
Submission No.	Submission Summary	CE response and recommendation
<a href="#">SD-C195-21 Barry Kelly</a>	<p>The submission requests lands in their ownership at Tay Lane, Newcastle Rd, Rathcoole, Co Dublin to be rezoned from RU to Residential. It is noted that the land is just in excess of 1/3 of an acre, is triangular in shape and it is submitted that it is featureless.</p> <p>The submission details the origin of the land and how one acre was left over following the realignment of Tay Lane in the 1930s and since that time two houses have been developed leaving the remainder of land which is subject of this submission.</p> <p>It is submitted that the land is featureless, bound by two roads, a stream and considered to be an infill site. In addition, it is noted that the land is surrounded by existing dwellings and that Tay Lane itself is now a cul-de-sac.</p> <p>It is noted that the land is located between Rathcoole village and Greenogue industrial Estate and that there are footpaths from the Naas Road all the way down to Greenogue industrial estate and the full length of Tay Lane. It is contended that the use of the land for agricultural purposes is not feasible given the adjacent dwellings and constraints</p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted.</p> <p>Having regard to the nature and location of the subject lands and upon further investigation of the same, it is noted that to rezone this land to allow for potential residential development would constitute undesirable ribbon development and would set an undesirable precedent for further development in this area.</p> <p>Furthermore, it is noted that the subject lands are bound by the Rathcreedan stream to the west. The OPW Eastern CFRAM study mapping identifies the area as having potentially elevated flood risk. The study identifies part of the site in question as being in Flood Zone A, with 'a medium probability of flooding'. The Guidelines for Planning Authorities on Flood Risk Management were published by the OPW and DECLG in 2009. The Flood Risk Management Guidelines advises in relation to Flood Zone A that highly vulnerable developments, such as dwelling houses 'would generally be considered inappropriate in this zone, unless the requirements of the Justification Test can be met'. The justification test carried out as part of the SFRA identified for the Greenogue general area notes that in accordance with the sequential approach, it is recommended to avoid the provision of highly vulnerable uses in Flood Zone A or B. Given the extent and</p>

	<p>from existing roads. However, it is submitted that there is potential for a safe driveway for residential purposes.</p> <p>The submission emphasises their extensive ties to the area both personal and work and it is contended that there should be no objections to rezoning of the land from agriculture to residential. The submission notes that they applied for permission 20 years ago and it was refused due the RU zoning. It is highlighted that Rathcoole has since had considerable residential development and they now wish to reside on Tay Lane in a more rural environment.</p>	<p>location of Flood Zone A on the lands in question, it is considered that the rezoning to residential zoning would be inappropriate.</p> <p>In addition, the subject lands are zoned RU 'Rural and Agricultural' where it is an objective as per Chapter 13 Implementation and Monitoring Table 13.1 'To protect and improve rural amenity and to provide for the development of agriculture'. Furthermore, urban generated housing within the rural area which would be facilitated through this rezoning, would result in and promote urban sprawl of the Dublin City and Suburbs boundary and be contrary to the rural housing guidelines which seek to prevent urban generated housing in rural areas.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
SD-C195-48 Finlay Colley	<p>The subject site measures stated approximately 6.7ha and is located in Kilmatead, Dublin 22. It comprises several residential properties, a plant nursery, and grazing land and several protected structures. It is noted that Kilcarbery is located to the north whereby 1,034 residential units were approved. Kingswood Business Park and Baldonnel Aerodrome lie to the west.</p> <p>The submission requests part of the site is rezoned to Objective RES-N 'New Residential' to assist with the delivery of new homes. The submission notes that the site is an established residential location that provides a mixture of detached houses, townhouses, and unused structures that could provide attractive living accommodation and contents that there is a good opportunity to expand this existing residential location with a small development of new homes.</p> <p>The submission highlights that while residential is 'Open for Consideration' under the current and draft plan OS zoning, preplanning meetings have advised that the site's zoning</p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted.</p> <p>The Core Strategy and Settlement Strategy in Chapter 2 sets out population and housing figures which must be consistent with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) as required under the Planning and Development Act 2000 (As Amended). South Dublin County is anticipated to grow by 46,518 persons with the housing target for the County, as set by Ministerial Guidelines and the NPF Road Map, being 17,817 homes up to 2028. Chapter 2 also confirms that the County has enough land for a further 10,470 units (79%) above the net household need and therefore there is no need to re-zone additional lands or zone new additional lands over and above those currently set out under the current 2016 County Development Plan. Having regard to above figures set out in the Core Strategy and the current excess of zoned land, without the need for further zoning, it is considered that there is sufficient flexibility to meet the household requirements for 2031 and potentially up to 2040. The revised target figures in response to the</p>

	<p>would need to be amended to permit an expanded residential development.</p> <p>The submission acknowledges that the Site does not meet the defined of Tier 1 'Serviced Zoned Land' but could become serviceable within the next plan period (i.e. by 2028).</p> <p>The submission presents an illustrative masterplan for the site.</p>	<p>OPR recommendations, set out separately under the response to the OPR, do not impact on the excess land capacity available to meet the revised targets. Therefore, to re-zone or zone new additional lands over and above those currently set out in the Draft Plan would be contrary to National and Regional planning policy.</p> <p>The submission also fails to acknowledge the value of the existing protected structures on the subject lands and the fact that the Draft Plan recognises and supports the reuse, repair, adaptation and upgrading of old buildings is a key component of promoting sustainable development and achieving compact growth with Section 3.6.1 and Policy NCBH24 and associated objectives.</p> <p>Furthermore, it is the aim of the Draft Plan to achieve an efficient use of land with a focus on key urban centres, and to achieve development densities that can support vibrant, compact, walkable places that prioritise pedestrian movement.</p> <p>The implementation of such measures requires a compact development form which would not be achieved by the rezoning of the subject lands and which would be contrary to a number of Draft Plan policies and objectives.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<p><a href="#">SD-C195-47 Douglas Hyde</a></p>	<p>The submission relates to a site comprising of 0.75-hectares of land adjacent to the junction of New Nangor Road and Woodford Walk, Clondalkin.</p> <p>The submission requests the site be rezoned from Open Space Zoning Objective to residential, with objective RES "to protect and/or improve residential amenity".</p> <p>It is proposed that an 0.75 ha infill site be zoned residential and that the more extensive remainder of the land should retain its Open Space zoning. The infill site is part of the</p>	<p><b>CE Response:</b></p> <p>The issues raised in the submission are noted.</p> <p>As part of the County Development Plan and SEA process 2022-2028, an Strategic Flood Risk Assessment (SFRA) to inform the Draft Plan was carried out for the County. The SFRA outlines how development can be adequately managed. The area in which the site is located is identified as Developed Lands with a High Vulnerability Zoning. Additionally, the Eastern CFRAM study mapping identifies the area as having a potential risk. The</p>

	<p>larger (1.85-ha) site in the same ownership at this location and it is proposed that the remaining 1.10-ha of the site should retain its current Open Space zoning. It is highlighted that retention of the open space zoning on all of the southern part of the land will (i) facilitate implementation of the strategic GI corridor 5, namely, the Camac River Corridor, (ii) facilitate provision of part of the cycle route proposed in the NTA Greater Dublin Cycle Network Plan, and (iii) provide an extensive land area adjoining the Camac.</p> <p>The submission puts forward a number of reasons justifying their request:</p> <ul style="list-style-type: none"> <li>• Well served by public transport and meets the criteria for sustainable urban living;</li> <li>• Housing development on the site is deliverable in the short term, all services are immediately available and development of same will quickly to alleviate the housing crisis;</li> <li>• Zoning would be consistent with planning policy on residential consolidation and intensification, sustainable mobility, appropriate climate action and the transfer to a low carbon and climate-resilient society;</li> <li>• Residential zoning for an infill site is essential in achieving compact and sustainable urban growth;</li> <li>• Zoning is consistent with the “10-minute neighbourhood” or “connected neighbourhood” concept;</li> <li>• Retention of the current zoning Objective OS would inhibit the proper planning and sustainable development of a site in danger of becoming a “site left over after planning” (or SLOAP) area;</li> <li>• In accordance with key elements of the “Draft Development Plans Guidelines for Planning Authorities”, with regard to the sequential approach; and</li> </ul>	<p>foregoing provides an evidence base on flood risk in the County. The studies identify a part of the site in question as being in flood risk zone A, with ‘a high probability of flooding’ with the remainder of the site as being in flood risk zone B, with ‘a moderate probability of flooding’.</p> <p>The Guidelines for Planning Authorities on Flood Risk Management were published by the OPW and DECLG in 2009. The Flood Risk Management Guidelines advises in relation to Flood Zone A that ‘most types of development would be considered inappropriate in this zone’ and that ‘development in this zone should be avoided and/or considered only in exceptional circumstances’. These ‘exceptional circumstances’ require all parts of a Development Plan justification test to be met ‘on a solid evidence basis’. Similarly, in Flood Zone B it advises that highly vulnerable development, such as dwelling houses ‘<i>would generally be considered inappropriate in this zone, unless the requirements of the Justification Test can be met</i>’. The justification test carried out as part of the SFRA identified New Nangor Road as Developed Lands with a High Vulnerability Zoning and a sequential approach to land use zoning and justification test is recommended. In accordance with the sequential approach, it is recommended that any development in Flood Zone A should consist of water compatible development only and avoid the provision of highly vulnerable uses in Flood Zone A or B.</p> <p>It is considered that on the basis of the information currently available to the Planning Authority, this cannot be met in respect of the subject lands as the Planning Authority is not satisfied that ‘it can be demonstrated on a solid evidence base that the zoning of RES on the subject site or designation for development will satisfy the justification test. This would be in accordance with recommendations of ‘The Planning System and Flood Risk Management Guidelines for Planning Authorities’ (2009). Given the extent and location of Flood Risk Zone A and B on the lands in</p>
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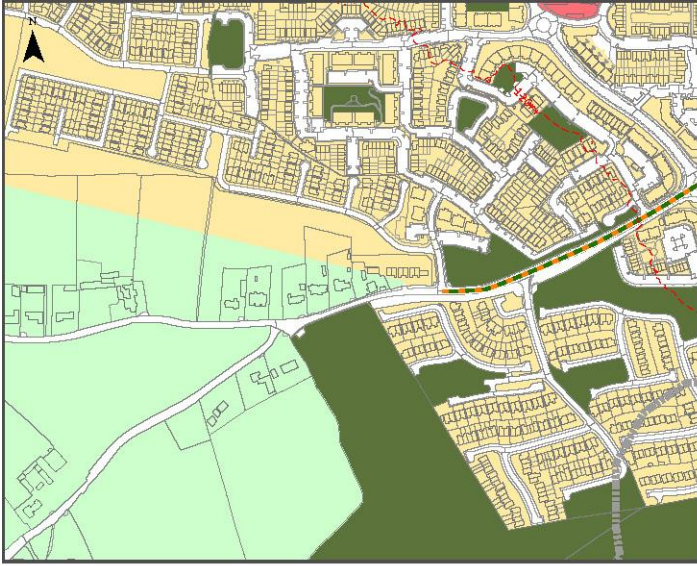
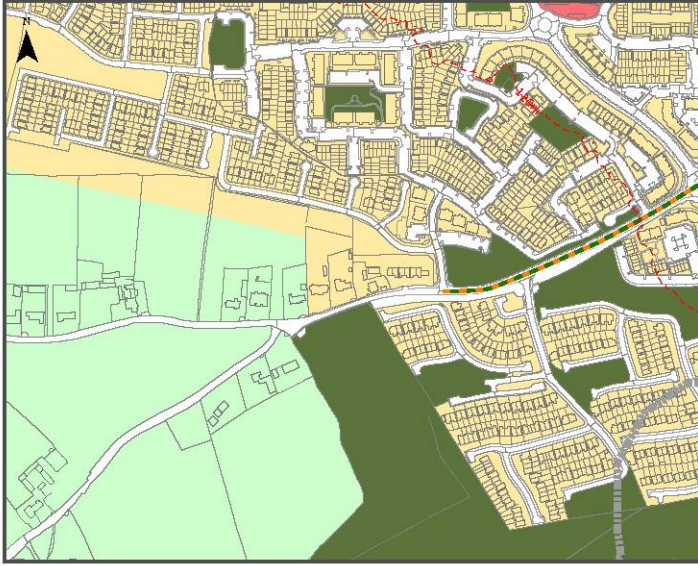


	<ul style="list-style-type: none"> <li>Confirmation of the availability vehicular access by way of an existing unsurfaced metalled road which is located just east of the Mayfield housing development.</li> </ul> <p>It is submitted that relevant criteria are satisfied in the application of an SFRA justification test to the proposal, as provided for in the Flood Risk Management Guideline and circumstances are identical to those pertaining to the adjoining Part 8 housing under construction. The submission highlights that the detailed Camac Flood Alleviation Study has been underway for some time with AECOM Ireland. It is highlighted that publicly available results seen, indicate that the extent of the area for flood relief purposes in the environs of New Nangor Road/Woodford Walk/Watery Lane will not be as extensive as that shown on the indicative maps in the SFRA study appended to the Draft Development Plan.</p> <p>The submission also notes that the site adjoins and is a small extension of the Mayfield Park site on which a new Part 8 housing is under construction at present. It is noted that the Part 8 is currently being constructed on Open Space zoned land and is located in a flood zone similar to that of the site subject of this submission.</p> <p>The submission also points out that the version of the base map on the Consultation Portal on which the Draft Development Plan is overlaid is out-of-date for this location. The Consultation Portal base map does not show the houses which were built 3/4 years ago and does not show the new housing under construction at Mayfield Park.</p>	<p>question, it is considered that the rezoning to residential zoning where the lands remain undeveloped would be inappropriate.</p> <p>The submission refers to the River Camac Flood Alleviation Scheme. It is noted that this joint scheme between Dublin City Council and South Dublin County Council in partnership with The Office of Public Works (OPW) is currently at Stage 1 of the Project. Stage 1 currently is looking at establishing the flood risk within the catchment and developing a full understanding of the environment within the catchment involving several surveys and the hydraulic computer models to identify the flooding. Only when this is complete, it will then allow the identification of possible flood alleviation options. Therefore, to rezone the subject site would be inappropriate and premature pending the final outcome of possible flood alleviation options at this location. Notwithstanding the above, the Draft Plan is committed to the protection of flood risk under Policy IE4 and associated objectives. Furthermore, it is an objective of the Draft Plan, IE4 Objective 4, to support and facilitate the delivery of flood alleviation schemes in South Dublin County to include the Camac Flood Alleviation Scheme amongst others.</p> <p>With regard to the Part 8 housing development adjacent to the subject site. It should be noted that it is located within flood risk zone C, with 'a low probability of flooding'. The Flood Risk Management Guidelines advises in relation to Flood Zone C that '<i>Development in this zone is appropriate from a flood risk perspective</i>'. Therefore, the flood zones of the subject site and this housing development are not and cannot be deemed the same.</p> <p>Furthermore, it is noted that the site is located fully within a Riparian Corridor. These zones act as the interface between rivers and adjoining lands and are key to managing flood risk within catchments of all sizes. Maintaining and enhancing Riparian Corridors creates "room for the river" and the benefits that entails including reducing risk to persons and property from flooding. Policy G13: Sustainable Water Management sets out a range of objectives which seek to protect the integrity of the Riparian</p>
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		<p>Corridor and how they can be maintained and enhanced having regard to flood risk management, biodiversity, ecosystem service provision, water quality and hydromorphology.</p> <p>With regard to the provision of housing on the subject site, it is noted that the Core Strategy and Settlement Strategy in Chapter 2 sets out population and housing figures which must be consistent with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) and also confirms that the County has enough land for a further 10,470 units (79%) above the net household need and therefore there is no need to re-zone additional lands or zone new additional lands over and above those currently set out under the current 2016 County Development Plan. Having regard to above figures set out in the Core Strategy and the current excess of zoned land, without the need for further zoning, it is considered that there is sufficient flexibility to meet the household requirements for 2031 and potentially up to 2040. The revised target figures in response to the OPR recommendations, set out separately under the response to the OPR, do not impact on the excess land capacity available to meet the revised targets. Therefore, to re-zone or zone new additional lands over and above those currently set out in the Draft Plan would be contrary to National and Regional planning policy.</p> <p>The submission refers to issues with the base map on the consultation portal. In this regard it should be noted that the base map on the Consultation Portal is provided to give a general sense of location only and it is an external service over which South Dublin County Council have no control. For the most up to date, please refer to the base mapping available the printed maps sheets or softcopy accompanying the Draft Plan.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
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<p>SD-C195-118 Josephine Smyth</p> <p>SD-C195-160 Charles Greene</p> <p>SD-C195-159 Colm McGrath</p> <p>SD-C195-202 Patrick Quinn</p>	<p>The submissions relate to four separate areas of land near Boherboy to include the following:</p> <ul style="list-style-type: none"> <li>• Lands between the Boherboy Road and Blessington Road in Saggart;</li> <li>• Lands near Slade, Saggart;</li> <li>• Lands at Boherboy Road, Saggart; and</li> <li>• Lands at Slade, Saggart.</li> </ul> <p>All four submissions request that the lands should be rezoned from: 'Objective RU - To protect and improve rural amenity and to provide for the development of agriculture', to 'Objective RES - To protect and/or improve residential amenity'.</p> <p>The submissions highlight the following points:</p> <ul style="list-style-type: none"> <li>• Subject lands are highly suitable for residential use and notes there are residential properties in close proximity within this area of the Boherboy Road;</li> <li>• Subject lands have excellent road frontage (for vehicular access) and are fully serviceable;</li> <li>• change of zoning will help provide for the South County Dublin housing needs into the future</li> <li>• Consider it crucial that all strategically located lands, particularly pockets of 'farmland' whose current use/non-use is incompatible with its zoning, be designated as development land and zoned appropriately.</li> </ul> <p>With regard to the submission with lands at the Boherboy Road, the submission considers that a neighbourhood development could include a variety of housing types, a retirement village, public park/playground and neighbourhood shop/services.</p>	<p><b>CE Response:</b></p> <p>The four submissions have been dealt with together as they identify landholdings adjacent to or in close proximity to the Boherboy Road and are located within objective RU 'To protect and improve rural amenity and to provide for the development of agriculture'. All three submissions seek their land to be rezoned to RES.</p> <p>The Core Strategy and Settlement Strategy in Chapter 2 sets out population and housing figures which must be consistent with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) as required under the Planning and Development Act 2000 (As Amended). South Dublin County is anticipated to grow by 46,518 persons with the housing target for the County, as set by Ministerial Guidelines and the NPF Road Map, being 17,817 homes up to 2028. Chapter 2 also confirms that the County has enough land for a further 10,470 units (79%) above the net household need and therefore there is no need to re-zone additional lands or zone new additional lands over and above those currently set out under the current 2016 County Development Plan. Having regard to above figures set out in the Core Strategy and the current excess of zoned land, without the need for further zoning, it is considered that there is sufficient flexibility to meet the household requirements for 2031 and potentially up to 2040. The revised target figures in response to the OPR recommendations, set out separately under the response to the OPR, do not impact on the excess land capacity available to meet the revised targets. Therefore, to re-zone or zone new additional lands over and above those currently set out in the Draft Plan would be contrary to National and Regional planning policy.</p> <p>All four subject lands are zoned RU 'Rural and Agricultural' where it is an objective as per Chapter 13 Implementation and Monitoring Table 13.1 'To protect and improve rural amenity and to provide for the development of agriculture'. Furthermore, urban generated housing within the rural area which would be facilitated through this</p>
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		<p>rezoning, would result in and promote urban sprawl of the Dublin City and Suburbs boundary and be contrary to the rural housing guidelines which seek to prevent urban generated housing in rural areas.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
<p>SD-C195-232 Peter McVerry Trust</p>	<p>The submission requests the rezoning of the subject lands from RU - Rural back to RES-N - New residential.</p> <p>The submission notes that under the previous development plan the subject lands were zoned 60% new community residential and 40% rural amenity.</p> <p>The submission highlights that they wish to develop the lands subject of this submission for the delivery of social housing units in the near future and that this rezoning greatly reduces the potential to develop on half of the subject lands.</p> <p>It is highlighted that this has significant effect on the development of the lands, as the final user would not meet the rural housing needs criteria.</p> <p>It noted that planning permission to develop these lands into 10 no units of single occupancy social housing is currently being developed and there has been ongoing conversations between South Dublin Housing and Planning departments and such a scheme has been supported to planning permission submission stage. The submission considers the zoning proposed will greatly reduce this potential.</p>	<p><b>CE Response:</b></p> <p>The submission requests the zoning be changed back from RU to RES-N.</p> <p>The lands in question comprise existing residential properties with private open space to the rear. The existing properties form part of a row of dwellings located on the Kiltipper Road but unlike the houses to the west their rear gardens fall within the RES-N zoning to the north within the Current Development 2016-2022. The subject lands comprise of a natural and heavily vegetated boundary to the rear extending into the RES zoning as per the Draft Plan, separated from and south of Elder Park.</p> <p>Land use zoning objectives do not necessarily follow property boundaries. However, having regard to the existing residential use on site and the fact that they are partially within the RES zoning, it is considered reasonable that the subject lands zoned Objective 'RU' be re-zoned to Objective 'RES', thereby providing one single land use class pertaining to the overall site. It is also considered that the two properties immediately to the east, which also contain RES zonings, should be included in the RES rezoning. It is considered that the zoning objective RES '<i>To protect and/or improve</i>' is more appropriate than RES-N and reflective of the nature of the subject lands. Furthermore, this zoning objective allows for residential development whilst protecting the character of the adjoining lands and immediate area.</p>

		<p><b>CE Recommendation:</b></p> <p>Amend <b>Map 9</b> to the subject site in its entirety and two properties to the immediate East from Objective RU – Rural and Agriculture– ‘<i>To protect and improve rural amenity and to provide for the development of agriculture</i>’</p> <p><b>to</b></p> <p>Objective RES - Existing Residential – ‘<i>To protect and/or improve residential amenity</i>’ for the entirety of the subject lands.</p>
<p><b>CE Recommendation:</b></p>		
 <p style="text-align: center;"><b>Draft</b></p>		 <p style="text-align: center;"><b>Proposed Amendment</b></p>
<p>SD-C195-162 Tom Phillips + Associates</p>	<p>The lands subject of this submission (c. 2.4 ha) are located at Westpark, Garters Lane, Citywest, Co. Dublin and</p>	<p><b>CE Response:</b></p> <p>The Core Strategy and Settlement Strategy in Chapter 2 set out population and housing figures which must be consistent with the</p>

	<p>comprise 6 no. apartment buildings with 84 No. residential units known as Westpark Apartments.</p> <p>The submission seeks to rezone the subject lands at Westpark Apartments to RES: To protect and/or improve residential amenity in order to recognise the existing residential use of these lands.</p> <p>The submission highlights permission was granted to refurbish these units to residential accommodation, and they now provide for 84 No. social and affordable residential units which are operated by Cluid Housing.</p> <p>The submission indicates that the pocket of land is zoned in the current South Dublin Development Plan as 'Objective OS' (Open Space) and considers that this zoning objective is not appropriate given the existing residential land use of the site and policies and objectives relating to Open Space zoning do not apply.</p> <p>The submission contends that this landbank now provides for residential accommodation and requires that the lands be rezoned to reflect this so they can be managed appropriately in accordance with Development Plan policies and objectives.</p>	<p>National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) as required under the Planning and Development Act 2000 (as amended) and confirms that the County has enough land for a further 10,470 units (79%) above the net household need and therefore there is no need to re-zone additional lands or zone new additional lands over and above those currently set out under the current 2016 County Development Plan. Having regard to above figures set out in the Core Strategy and the current excess of zoned land, without the need for further zoning, it is considered that there is sufficient flexibility to meet the household requirements for 2031 and potentially up to 2040. The revised target figures in response to the OPR recommendations, set out separately under the response to the OPR, do not impact on the excess land capacity available to meet the revised targets. Therefore, to re-zone or zone new additional lands over and above those currently set out in the Draft Plan would be contrary to National and Regional planning policy.</p> <p>Residential development is listed as Open for Consideration under the OS zoning objective in the Draft Plan and therefore provides scope for the existing use to be managed appropriately whilst. Notwithstanding, and having regard to the submission from the OPR, the current residential use is a non-conforming use. Policy in the Draft Plan for non-conforming uses is set out in section 13.1.1 (vi) and provides for existing development which has a valid permission to be considered for development proposals where such proposals would not be detrimental to the amenities of the surrounding area and would accord with the principles of proper planning and sustainable development.</p> <p>Having regard to the context set out above, where there is sufficient zoned lands in the County to provide for the housing targets, and to the provisions under the non-conforming use policy, it is considered that the rezoning of the subject lands to RES is neither appropriate nor necessary and would be contrary to national and regional policy.</p>
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		<p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<p>SD-C195-151 Armstrong Fenton Ltd</p>	<p>The land subject of this submission is approximately 0.029 hectares and is located to the immediate east of No. 36 Ash Park Court and extends along the rear of No's 20, 22 and 24 Ash Park Court.</p> <p>The submission seeks to rezone lands adjacent to No. 36 Ash Park Court to objective "RES". The submission notes that the lands are currently zoned Objective OS: "To preserve and provide for Open Space and Recreational Amenities" in the current Plan and in the Draft Plan.</p> <p>The submission highlights the following reasons as to why the lands should be zoned RES:</p> <ul style="list-style-type: none"> <li>• Subject lands are in private ownership, not taken in charge and are essentially left-over ground from the overall development of Ash Park Court;</li> <li>• Subject lands were not originally proposed as being part of the public open space provision for Ash Park, nor does it encroach onto the open spaces for this overall development;</li> <li>• Subject lands are infill can be realistically developed for a limited quantum c.1-2 units of housing that is an efficient and sustainable use of existing services and facilities that are in the locality; and</li> <li>• Zoning of the subject lands will eradicate any anti-social behaviour occurring on the land, given its locational context and lack of passive supervision.</li> </ul>	<p><b>CE Response:</b></p> <p>The submission requests the zoning be changed from open space to residential.</p> <p>It would appear that the lands in question serve as vacant and idle space adjoining residential development of Ash Park Court. The subject lands are heavily vegetated and walled which marks a distinct separation between the Ask Park Court Development and the vacant lands. The subject land comprises of a narrow tract of incidental or 'left-over' strip of land after the residential development was designed.</p> <p>Land use zoning objectives do not necessarily follow property boundaries. However, having regard to the permitted uses immediately adjacent and nature of the land, the rationalisation of a small area of land currently in private ownership and lying vacant, the potential for anti-social behaviour it is considered that the subject lands zoned Objective 'OS' should be re-zoned Objective 'RES', thereby providing a land use class similar to that of the adjacent land uses which would rationalize the use of this area measuring 0.029ha.</p> <p><b>CE Recommendation:</b></p> <p><b>Amend Map 01</b> to change from:</p> <p>Objective OS – Open Space – <i>'To preserve and provide for open space and recreational amenities'</i></p> <p>to</p> <p>Objective RES - Existing Residential – <i>'To protect and/or improve residential amenity'</i>.</p>



**CE Recommendation:**



**Draft**



**Proposed Amendment**

[SD-C195-152 Dublin City sports and social club](#)

The submission requests land at Coldcut Road near Liffey Valley, Clondalkin (note that the address is Ballyfermot) to be rezoned from amenity to residential. Dublin City Sports and Social Club are in ownership of the subject land. The submission notes that the subject land is 6 ½ acres in total and backs onto Harelawn Estate.

The submission indicates that the rezoning request is being sought so they can dispose of the land to a developer (or the council) in order to generate funds that are vital to the survival of the Club. The submission highlights the lands were once used as GAA pitches and the demand is not there for such use. It is further noted that the land is overgrown and unkempt and the Club is unable to maintain it. The submission notes that the Club is currently closed due to

**CE Response:**

The Core Strategy and Settlement Strategy in Chapter 2 sets out population and housing figures which must be consistent with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) as required under the Planning and Development Act 2000 (As Amended). South Dublin County is anticipated to grow by 46,518 persons with the housing target for the County, as set by Ministerial Guidelines and the NPF Road Map, being 17,817 homes up to 2028. Chapter 2 also confirms that the County has enough land for a further 10,470 units (79%) above the net household need and therefore there is no need to re-zone additional lands or zone new additional lands over and above those currently set out under the current 2016 County Development Plan. Having regard to above figures set out in the



	<p>financial constraints and works required. It is highlighted that the club is a non-profit organisation and has catered to many members of the community since 1960s.</p>	<p>Core Strategy and the current excess of zoned land, without the need for further zoning, it is considered that there is sufficient flexibility to meet the household requirements for 2031 and potentially up to 2040. The revised target figures in response to the OPR recommendations, set out separately under the response to the OPR, do not impact on the excess land capacity available to meet the revised targets. Therefore, to re-zone or zone new additional lands over and above those currently set out in the Draft Plan would be contrary to National and Regional planning policy.</p> <p>Furthermore, it noted the NTA Greater Dublin Area Transport Strategy 2022-2041 has undertaken an analysis which indicates that a number of corridors in the GDA will, in the longer term, generate travel demand above that which can be catered for by higher capacity bus systems and are likely to require upgrading to light rail in the period after 2042. The NTA will undertake detailed appraisal, planning and design work for a number of Luas lines, with a view to their delivery in the period after 2042 to include for light rail line from the city centre towards Lucan. Specifically, the Strategy notes under Section 12.3.5 ‘Lucan’ that based on work carried out previously, and further subsequent analyses, the NTA is satisfied that sufficient demand for a light rail line from the city centre towards Lucan exists and that a project should be pursued to meet this demand. The alignment and the locations to be served between Lucan and the City Centre have yet to be determined and will be subject to further assessment and analysis. This is reinforced in the strategy under Measure LRT3 – Luas Lucan which states <i>“It is intended to develop a light rail line from Lucan to the City Centre, supplementing and complementing the planned bus system, to serve the overall public transport needs in this area.”</i></p> <p>The NTA is of the view that it is prudent to identify these corridors in this Transport Strategy in order to set out a longer-term framework for transport investment in the GDA and to ensure that planning and design work can commence during the strategy</p>
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		<p>period. Therefore, until such time that a line is determined it considered premature to rezone the subject lands.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
<p><a href="#">SD-C195-139 Peter Doody</a></p>	<p>The land subject to this submission has an area of 0.165 ha and is located at the junction of Firhouse Road and Cremorne (between Ballyboden St. Endas GAA ground and Pine Grove housing development). The submission notes that the subject lands currently comprise of two zoning objectives RES and OS.</p> <p>The submission requests that the subject lands are rezoned Objective RES – “to protect and / or improve residential amenity” in their entirety.</p> <p>The submission highlights that the land was originally identified in the 1970’s as an area to facilitate wide radius sweeps for the proposed new North – South roadway crossing Firhouse Road and the route finally chosen for the main road is now approximately 150m to the East. It is noted that a more modest housing estate road entrance (to Cremorne) was built and accordingly, a large area of the subject lands remains under-utilised in terms of development.</p> <p>It is submitted that the adjacent housing developments appear uncoordinated and disjointed due this land being left over and not developed.</p> <p>The submission notes that the Roads Department of South Dublin County Council propose to re-locate the entrance to the Pine Grove Housing from the busy main Firhouse Road to the safer / quieter Cremorne estate road and it is</p>	<p><b>CE Response:</b></p> <p>The submission requests that stated 0.165ha of the subject lands are rezoned Objective RES – “to protect and / or improve residential amenity” in their entirety.</p> <p>The subject lands are located immediately adjacent to the Firhouse Road (R114) which is a Regional Road and are spilt on either side of the main access road to the established Cremore Housing Development.</p> <p>It is noted that a very small portion of the subject lands is zoned objective RES and the remainder of the lands are zoned OS. The subject lands have an established setting and are laid out as open space with pedestrian paths and linkages, maintained landscaping and established mature trees. The subject lands also act as a natural and important buffer between a busy Regional Road and established housing development and further provide mitigation measures such as setback landscaping a noise barrier. The proposed road amendments are noted but are not considered to have any material change to the setting of the subject lands which would make a zoning change to RES more appropriate.</p> <p>In this context, it is considered inappropriate to rezone the subject lands as requested given their established open space setting and role they play in alleviating impacts from a busy Regional Road. Furthermore, it would set an undesirable precedent, would be out of character of the area, and would otherwise be inconsistent with the proper planning and sustainable development of the area.</p> <p><b>CE Recommendation:</b></p>

	submitted that this would facilitate a natural continuation of the building line of the Pine Grove development.	No change to Draft Plan.
<a href="#">SD-C195-132 Armstrong Fenton Associates</a> <a href="#">SD-C195-81 Peter Anderson</a> <a href="#">SD-C195-277 John Coleman</a> <a href="#">SD-C195-283 Finnstown Abbey Residents Association</a> <a href="#">SD-C195-51 Finnstown Fairways Residents Association</a> <a href="#">SD-C195-273 Ashleigh D'Arcy</a> <a href="#">SD-C195-98 James Anderson</a> <a href="#">SD-C195-225 An Claiomh Glas</a>	<p>The submission seeks the rezoning of approximately 10 hectares of land at Finnstown in Lucan from Objective OS: "To preserve and provide for Open Space and Recreational Amenities" to Objective RES-N "To provide for new residential communities in accordance with approved area plans".</p> <p>The subject lands are bound by Finnstown House Hotel, residential development, and Adamstown SDZ with access onto the R120 Newcastle/Lock Road.</p> <p>The submission details a number of reasons justifying their request for a RES-N rezoning to include the following:</p> <ul style="list-style-type: none"> <li>• Subject lands are in private ownership, agricultural use, not accessible to public or used as recreational open space and do not accord with the OS zoning;</li> <li>• Surrounded by developed lands or lands due to be developed and will remain vacant and unused if not rezoned;</li> <li>• Best placed to cater for new housing in this area;</li> <li>• Considers capacity sites North of the M7 such as Clonburris and Kilcarbery with extant SHD permission cannot realistically be included as lands available for residential development in the new Development Plan and its Core Strategy;</li> <li>• Notes lands in vicinity of subject lands with extant permissions and residential zonings should be omitted and be discounted - sites comprise of a total of 9.5ha and should be transferred to the subject lands which can deliver the required residential housing;</li> <li>• Rezoning would be in accordance with National and Regional policy including Rebuilding Ireland - Action Plan for Housing and Homelessness, 2016;</li> </ul>	<p><b>CE Response:</b></p> <p>The issues aised in all the submissions are noted.</p> <p>The subject lands, 10 ha, are zoned OS Open Space, in the Draft Plan and lie to the east of Adamstown SDZ. is the submission proposes that the subject lands would be zoned Res-N. The Core Strategy and Settlement Strategy in Chapter 2 sets out population and housing figures which must be consistent with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) and also confirms that the County has enough land for a further 10,470 units (79%) above the net household need and therefore there is no need to re-zone additional lands or zone new additional lands over and above those currently set out under the current 2016 County Development Plan.</p> <p>Having regard to above figures set out in the Core Strategy and the current excess of zoned land, without the need for further zoning, it is considered that there is sufficient flexibility to meet the household requirements for 2031 and potentially up to 2040. The revised target figures in response to the OPR recommendations, set out separately under the response to the OPR, do not impact on the excess land capacity available to meet the revised targets. Therefore, to re-zone or zone new additional lands over and above those currently set out in the Draft Plan would be contrary to National and Regional planning policy.</p> <p>In this context, and as noted above, it is recognised that South Dublin County has a physical excess of zoned lands to meet the population and housing targets set out under national and regional policy. These lands are also located, for the most part, within existing built-up areas in Dublin City and Suburbs and will, therefore, support compact growth. While it is noted that the</p>

	<ul style="list-style-type: none"> <li>• Subject lands are accessible in terms of road access, public transport options and routes and retail amenities and are ideally located for the provision of medium to high density housing;</li> <li>• Rezoning will also consolidate development on the western side of the R120 within the existing development boundary of the county; and</li> <li>• Option to deliver a portion of the lands for community / recreational use.</li> </ul> <p>It also noted that there are a number of submissions that express concerns regarding the road infrastructure at Newcastle and around Finnstown Castle Hotel, Lucan. The submissions consider such infrastructure to be currently under immense pressure without adding more housing to these areas. In addition, they consider that the lands surrounding Finnstown Castle Hotel should be retained as park and recreation and request it is retained as green and open space zoning and notes that Lucan has adequate amounts of lands already zoned for housing in Clonburris and Adamstown and it is also important to maintain local green areas for the future population growth. The submissions highlight that in an area of high-density residential development, the quiet ambience around the castle provides a quality community resource.</p>	<p>subject lands are located within Dublin City and Suburbs, they are considered to be surplus to requirement during the lifetime of the Draft Plan. Lucan is undergoing significant growth in the adjacent designated lands at Adamstown SDZ planning scheme and further zoning in this area is not required at this time.</p> <p>It is also noted that there are two protected structures on the adjacent lands comprising of RPS No. 112: Finnstown House, Lucan and RPS No. 108: St. Helen's Finnstown, Lucan.</p> <p>It is considered that to rezone the subject lands is not required and that the consolidation of Lucan through the completion of Adamstown SDZ and other infill capacity sites is more than sufficient to meet the housing supply targets and the target allocations for this neighbourhood. Having regard to the excess capacity of exiting zoned lands to meet the required targets the propose rezoning would be at variance with National and Regional policies and objectives.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<p>SD-C195-157 Cape Wrath Hotel Unlimited Company</p> <p>SD-C195-168 Cape Wrath Hotel Unlimited</p>	<p>The submission relates to a significant landholding located across the Fortunestown and Citywest area in and around the Citywest Hotel and Business Campus. The subject lands comprise of 89ha in total.</p> <p>The submission notes that the vast majority of the lands are zoned as 'Open Space' and requests they are rezoned to RES-N: New Residential.</p>	<p><b>CE Response:</b></p> <p>The lands subject to the submissions relate to c.20ha of OS zoning to the south of the Citywest Hotel and Conference Centre, a further 2ha to the northeast and a stated 21ha of the former executive golf club lands extending to the Boherboy Road.</p> <p>The issues raised in the submission are noted and dealt with under the following headings:</p> <ul style="list-style-type: none"> <li>• Core Strategy, Land Capacity and Deliverability</li> </ul>

	<p>Submission provides reasons and justifications as to why the lands should be rezoned to include the following:</p> <ul style="list-style-type: none"> <li>• Strategic location for accessibility and amenities;</li> <li>• Fortunestown and Citywest areas are identified within the Dublin MASP and the RSES as being particularly suitable for new residential communities;</li> <li>• Zoning of additional lands for residential uses within this area would also fully align with the Draft Plan which clearly acknowledges the importance of Fortunestown;</li> <li>• The western portion of the Cape Wrath lands would retain a green linkage along the Naas Road thereby providing a connection between Rathcoole Park and the open space area at the north of the subject lands aligning with the GI Strategy and Primary and Secondary GI Corridors; and</li> <li>• Development of new residential communities here would open these lands up to provide for green linkages between Saggart and Citywest.</li> </ul> <p>The submission outlines a number of issues related to housing and residential zoned land as detailed in the Draft Plan land to include the following:</p> <ul style="list-style-type: none"> <li>• Quantum of available lands zoned for new residential communities is relatively small and does not reflect the importance or settlement status of Citywest and Fortunestown's;</li> <li>• Deliverability of strategic long term development areas is not evidenced in the Draft Plan through figures;</li> <li>• Significant proportion of the undeveloped residential landbanks in the County (excluding SDZ lands in Clonburris and Adamstown) has not been brought forward for development;</li> </ul>	<ul style="list-style-type: none"> <li>• Additional Provision</li> <li>• Strategic Long Term Development Areas</li> <li>• Fortunestown/Citywest</li> <li>• Open Space/Green Infrastructure</li> </ul> <p><b>Core Strategy, Land Capacity and Deliverability</b></p> <p>The Core Strategy and Settlement Strategy in Chapter 2 sets out population and housing figures which must be consistent with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) as required under the Planning and Development Act 2000 (As Amended). This confirms that the County has enough land for a further 10,470 units (79%) above the net household need and therefore there is no need to re-zone additional lands or zone new additional lands over and above those currently set out under the current 2016 County Development Plan. Having regard to above figures set out in the Core Strategy and the current excess of zoned land, without the need for further zoning, it is considered that there is sufficient flexibility to meet the household requirements for 2031 and potentially up to 2040. The revised target figures in response to the OPR recommendations, set out separately under the response to the OPR, do not impact on the excess land capacity available to meet the revised targets. Therefore, to re-zone or zone new additional lands over and above those currently set out in the Draft Plan would be contrary to National and Regional planning policy.</p> <p>The methodology for calculating the housing target in the Core Strategy takes account of pent-up demand and historical and ongoing under supply in the delivery of housing. The calculation of the housing target calculates a housing requirement to provide for the overall population of South Dublin in accordance with national and regional population allocations. This housing target factors in demand from both existing population and future population.</p> <p>The Land Capacity Audit, which informs the Core Strategy, comprised a very comprehensive review and analysis to calculate</p>
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	<ul style="list-style-type: none"> <li>• The 23,370 units is wholly inadequate to meet an anticipated housing demand figure of 17,817 for the County over the Plan's lifetime;</li> <li>• Lack of focus on the subject lands and the omission of Fortunestown and Citywest from Table 8 of the Draft Plan demonstrates an inconsistency between strategic planning policy at national and regional level;</li> <li>• Current quantum and location of residential lands proposed by SDCC is insufficient to meet the projected population increase and housing targets;</li> <li>• Very few residential zoned remaining sites within Fortunestown which are undeveloped; and</li> <li>• No evidence or transparency that the undeveloped residential landbanks in the County will actually be developed.</li> </ul> <p>The submission also notes that a rectangular parcel of the subject lands on the corner of Garter Lane / Fortunestown Lane immediately adjacent to the Saggart LUAS stop comprises of a Strategic Housing Development consisting of 224 No. apartments was permitted in December 2020 with respect to this parcel of land (ABP Ref. 308088) with 50% for senior living.</p> <p>The submission refers to the Draft Development Plan Guidelines for Planning Authorities planning. The guidance states "In cases where land is zoned and has remained undeveloped and unserviced through one or more development plan cycles, with no prospect of being serviced within the six-year life of the development plan that is under preparation, alternative approaches must be considered:- (i) alternative zoning objectives or (ii) discontinuing the objective". The submission considers the Draft Plan has deviated from this guidance.</p>	<p>the potential yield of undeveloped land (RES, RES-N, TC, REGEN, VC, DC, LC and SDZ) zoned in the 2016 - 2022 County Development Plan. Zoned land with extant permission not commenced (estimated 6,517 units) has been recognised and factored into the Core Strategy figure. In considering such extant permissions a deliverability analysis has also been carried out and has informed the development of the Core Strategy. In addition, a rigorous Infrastructure Assessment and Social Infrastructure Audit was carried out that built on the initial Land Capacity Analysis. This assessment gathered pertinent data on identified lands in relation to their infrastructural constraints and requirements in order to differentiate between zoned land that is available for development and zoned land that requires significant further investment in services for infrastructure for development to be realised. This identifies the assets in each settlement and opportunities to ensure further growth is provided for in tandem with social and physical infrastructure.</p> <p>It should be recognised that South Dublin County has a physical excess of zoned lands to meet the population and housing targets set out under national and regional policy. These lands are located, for the most part, within existing built-up areas in Dublin City and Suburbs and will, therefore, support compact growth. In support of the compact growth agenda, the Development Plan has placed a significant emphasis on deliverability, monitoring, growth, and active land management.</p> <p>In this regard, the Draft Plan acknowledges the need for the delivery of a compact growth agenda and includes a range of measures which promote development including: Policy CS3: Monitoring Population and Housing Growth and associated objectives (<i>See recommended changes outlined in the response to the OPR submission at the beginning of this report (SD-195-227) with regard to CS3 Objective 3</i>).; Policy CS4: Active Land Management and associated objectives; Policy CS6: Settlement Strategy - Strategic Planning Principles and associated objectives;</p>
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	<p>The submission also points out the 'additional provision' of the draft guidance and notes that the provision of additional residentially zoned lands at Fortunestown and Citywest would fully accord with the above referenced criteria.</p>	<p>and Policy CS7: Consolidation Areas within the Dublin City and Suburbs Settlement and associated objectives.</p> <p>Furthermore, it is noted that in the submission made by the Office of the Planning Regulator (OPR), how the core strategy has attempted to strike a balance between having an excess of zoned land and being able to deliver new development and they welcome the inclusion of policies and objectives for the monitoring and delivery of the same.</p> <p>Having regard to the above context, it is considered that a transparent evidence-based approach has been put forward in the Draft Plan which allows for a degree of flexibility within the core strategy under the specific parameters. It is therefore considered that the Draft Plan provides the appropriate balance between monitoring and promoting the deliverability and development of lands zoned within the County within the lifetime of the Plan. Furthermore, it is noted that the 4-step approach to determine the land capacity fully aligns with Section 28 guidance.</p> <p><b>Additional Provision</b></p> <p>As outlined above, the Council will monitor the delivery of housing units to ensure general compliance with the Core Strategy and housing supply targets for the County and to inform any redistribution potential to facilitate delivery. The Core Strategy figures for each neighbourhood area serve as a benchmark for monitoring to ensure compliance with National and Regional figures. Noting that the Draft Plan has a surplus of zoned land to meet the housing targets set out in the Housing Supply Targets issued by the Department of Housing, Local Government and Heritage in January 2021, there is no basis for the Plan providing for 'Additional Provision'.</p> <p>The reference to lands remaining zoned in a number of development plans but being undeveloped is noted, The Planning Authority has examined this in detail and is satisfied that the</p>
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		<p>majority of lands to which this applies relate to Adamstown and Clonburris SDZs which are strategic long term lands identified in the RSES and to other LAP areas, including Fortunestown, and for which development is now progressing.</p> <p><b>Strategic Long Term Development Areas</b></p> <p>The submission notes that the Long-Term Strategic Lands are not evidenced in the figures. The Draft Plan indicates that significant areas of lands identified for Strategic Development Areas have been excluded from the land capacity over the Development Plan period except where it is considered a percentage of development can occur within that timeframe. Of the total land capacity, it should be noted that Draft Plan indicates that approximately 150 ha of Long-Term Strategic lands providing for more than 7,500 units have been identified as being deliverable over the Development Plan period and are included in the land capacity figures in Table 9. It should also be noted that these zoned lands will provide further capacity in succeeding development plans.</p> <p>It is noted that Table 8 relates to Strategic Long Term Development Areas and while Fortunestown/Citywest is identified as a strategic development area within the south western corridor in the RSES, it is not a long term development area under that heading in the Draft Plan. It is however, included in Table 9, land capacity.</p> <p><b>Fortunestown/Citywest</b></p> <p>In line with the RSES, the Citywest area is recognised in the Draft Plan as a new district, with core strategy allocation for residential growth. The relevant area is subject to a Local Area Plan (LAP). 'Fortunestown Local Area Plan 2012-2022'.</p> <p>In this regard, QDP14 SLO1 requires that the phasing in Fortunestown LAP is adhered to and that the appropriate levels of services, social and sports infrastructure, facilities and economic activity is met to meet the needs of the current and future</p>
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		<p>population growth. The zoned lands at Fortunestown have been subject to considerable growth since 2016. Full infrastructure provision has not been achieved to date and it is an objective of the Plan to ensure that it is delivered. In addition, the extent of growth has exceeded the LAP figures as a result of various guidelines which have been brought in since the LAP was adopted. It is noted that there is ongoing development on the lands with permission granted for most of the remaining sites, some with units under construction. However, this does not suggest that further lands should be zoned in this area as a result. Instead, this new urban area should be given time to grow its new communities as the necessary infrastructure continues to be provided. As outlined above, there are sufficient zoned lands within Dublin City and Suburbs and in the existing towns without the need to consider further zoning.</p> <p><b>Open Space/Green Infrastructure</b></p> <p>As noted in the submission, the subject lands are located in a 'Strategic Corridor 5: Camac River Corridor' (Primary GI Corridor 5) and the 'Citywest-Saggart Link' (Secondary GI Corridor - L7) which provide for movement of flora and fauna between GI Cores. It is an overarching objective of this corridor to avoid further fragmentation of the Green Infrastructure network at the urban fringe and strengthen existing ecological links between built-up areas along this corridor. The submission comments on this are noted but the fundamental issue is the proposal to rezone the site.</p> <p>Having regard to the context set out above, it is considered that the rezoning of the subject lands to RES-N would undermine the sustainable development of the County and of this area and would be contrary to national and regional policy...</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
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<p>SD-C195-218 Simon Clear &amp; Associates</p>	<p>The submission relates to two parcels of land located at Woodtown, Co Dublin and is a joint submission on behalf of two landowners. The submission requests that the subject lands be zoned to RES-N and form an extension of the Ballycullen LAP.</p> <p>The submission sets out a number of reasons as to why the subjects lands should be rezoned for residential to include the following:</p> <ul style="list-style-type: none"> <li>• The overall sustainable development of the Woodtown area in the vicinity of the Ballycullen neighbourhood;</li> <li>• Consolidation of the Oldcourt/Ballycullen neighbourhood into the northern and eastern Woodtown area supported by enhanced access, public transport and community infrastructure already provided in the area;</li> <li>• Woodtown Manor demesne lands, with their extensive road frontages onto the R115 and R113 present beneficial strategic development opportunities relating to integration with the adjacent suburbs and facilitating access to tourism and recreation in the foothills of the Dublin Mountains; and</li> <li>• Facilitates better road improvement solutions necessary to support the Dublin Mountains Visitor Centre (DMVC) project.</li> </ul> <p>The Submission notes that EDE21 SLO 1 is now included in the Draft Plan and welcomes the SLO and notes that this submission is not intended to supplant or replace the SLO.</p> <p>The submission acknowledges two land parcels owned by South Dublin County Council adjacent to the subject lands and submits that there are road infrastructure issues. The submission suggests that these issues can be eliminated by</p>	<p><b>CE Response:</b></p> <p>The submission requests the rezoning of two parcels of land to RES-N located at Woodtown, Co Dublin. The subject lands are located adjacent to the Ballycullen LAP Boundary and are currently zoned RU – “<i>To protect and improve rural amenity and to provide for the development of agriculture</i>”.</p> <p>The Core Strategy and Settlement Strategy in Chapter 2 sets out population and housing figures which must be consistent with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) as required under the Planning and Development Act 2000 (As Amended). South Dublin County is anticipated to grow by 46,518 persons with the housing target for the County, as set by Ministerial Guidelines and the NPF Road Map, being 17,817 homes up to 2028. Chapter 2 also confirms that the County has enough land for a further 10,470 units (79%) above the net household need and therefore there is no need to re-zone additional lands or zone new additional lands over and above those currently set out under the current 2016 County Development Plan.</p> <p>Having regard to above figures set out in the Core Strategy and the current excess of zoned land, without the need for further zoning, it is considered that there is sufficient flexibility to meet the household requirements for 2031 and potentially up to 2040. The revised target figures in response to the OPR recommendations, set out separately under the response to the OPR, do not impact on the excess land capacity available to meet the revised targets. Therefore, to re-zone or zone new additional lands over and above those currently set out in the Draft Plan would be contrary to National and Regional planning policy.</p> <p>The subject lands are currently zoned rural, located at the southern edge of the Dublin City and Suburbs settlement boundary. The</p>

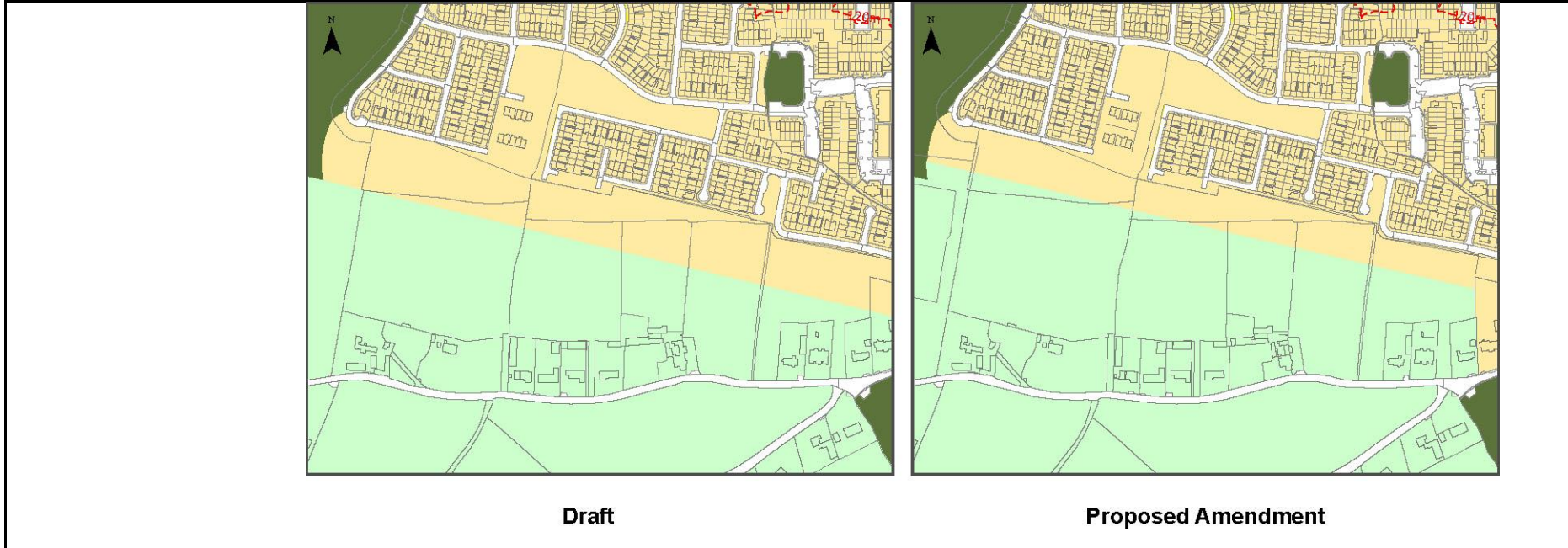
	<p>engagement with the relevant owners to give effect to the road improvement objectives in the Development Plan.</p>	<p>core principle of the NPF is compact urban growth through the consolidation of the exiting-built footprint of settlements. The Draft Plan prioritises the development of existing zoned lands particularly within MASP growth areas and to re-zone additional lands, especially at the periphery of the County which would continue the sprawl of the urban area towards the mountains is not considered appropriate.</p> <p>Development which further sprawls the settlement boundary is contrary to the analysis carried out in Chapter 2 having regard to the projected population growth for the Dublin City and Suburbs settlement and parameters under of NSO 1, and NPO 3b. As such, there is no requirement to re-zone additional land for residential purposes to meet the needs of the targeted population increase and thus household need up to 2028.</p> <p>In this context, the rezoning of the subject lands undermines the delivery of households within strategic residential growth sites identified within the Regional Metropolitan Area Strategic Plan at: Adamstown, Clonburris, Tallaght, Naas Road and Fortunestown which would be contrary to National and Regional Planning Policy</p> <p>The 'Ballyboden Road/Stocking Lane (R115); Upgrade of existing road; To enhance pedestrian and cycling facilities and exploit the tourist potential of the route' is included in Table 7.5 'Six Year Road Programme' of the Draft Plan. Any enhancements to this road/lane will be carried out under the relevant procedures and are not dependent on a particular zoning.</p> <p>Furthermore, the provision of housing at this rural location would lead to a potential erosion of elevated rural amenity and would detract from the character and landscape of the receiving environment bearing in mind the lands proximity to the HA-DM zone. In addition, it is considered that the rezoning of the lands would undermine and impact on EDE21 SLO 1 which seeks to facilitate tourism activity at Woodlands Manor House and lands at</p>
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		<p>Stocking Lane, Rathfarnham in line with Dublin Mountains High Amenity Land Use Zoning.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
<p>SD-C195-176 Manahan Planners</p> <p>SD-C195-147 Declan Dunne</p> <p>SD-C195-67 Hermitage Park</p> <p>SD-C195-69 Siobhan Nolan</p>	<p>The submission seeks the rezoning from retail warehouse to Objective 'RES' "<i>to protect and/or improve residential amenity</i>" at lands adjacent the Foxhunter Pub, Lucan Road, Ballydowd, Lucan, Co Dublin.</p> <p>The submission details a number of reasons justifying the request for rezoning the subject lands to include the following:</p> <ul style="list-style-type: none"> <li>• Located in an established suburban area of Lucan and highlights the mix of uses that bound the subject lands;</li> <li>• Strategic location in terms of public transport and cycle network;</li> <li>• Retail warehouse would be difficult to facilitate due to access issues from the N4 and site access issues;</li> <li>• Insufficient in size to accommodate a retail warehouse building and its attendant parking;</li> <li>• Reversion to the previous residential use would be the optimum outcome.</li> <li>• Previous planning history demonstrates residential use is acceptable;</li> <li>• Aligns with national and regional policy in terms of compact growth and delivery of housing;</li> <li>• Currently residential development would be a material contravention to the zoning objective;</li> <li>• Well located with regard to proximity to existing community and social infrastructure and the subject lands considered to be located within an "Intermediate Urban Location";</li> </ul>	<p><b>CE Response:</b></p> <p>The Foxhunters pub site is zoned 'RW' in the Draft Plan. The submission recommends that a RES zoning be adopted for the site. The zoning objective for RES is "<i>to protect and/or improve residential amenity</i>".</p> <p>It is noted that permission was granted for a residential development under SD05A/0409. However, it was never acted upon.</p> <p>It is recognised that the site has access issues located, as it is, at a slip road and junction on the N4. However, this difficulty will need to be overcome for the site to be feasible irrespective of the zoning on the site.</p> <p>The Core Strategy and Settlement Strategy in Chapter 2 sets out population and housing figures which must be consistent with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) as required under the Planning and Development Act 2000 (As Amended). South Dublin County is anticipated to grow by 46,518 persons with the housing target for the County, as set by Ministerial Guidelines and the NPF Road Map, being 17,817 homes up to 2028. Chapter 2 also confirms that the County has enough land for a further 10,470 units (79%) above the net household need and therefore there is no need to re-zone additional lands or zone new additional lands over and above those currently set out under the current 2016 County Development Plan.</p>

	<ul style="list-style-type: none"> <li>• Intermediate urban location where smaller higher density residential developments are suitable due the strategic location for public transport, social and retail amenities; and</li> <li>• Residential development proposed would have a negligible impact upon the established local traffic conditions.</li> </ul> <p>The submission also discusses the policy context and points out that current SDCC 2016 Development Plan has allocated a zoning Objective RW, “to provide for Retail Warehouse use” where residential use is a “Not Permitted” land use. It is further noted that the previous Development Plan 2010-2016 permitted residential use on the site and indeed permission was previously granted for residential development. The submission highlights that planning permission was granted under Reg. Ref. SD05A/0409 for a small residential development under the 2010-2016 development plan whereby the subject lands were zoned ‘Objective A’ “to protect and/or improve Residential Amenity”.</p> <p>In addition, three submissions (SD-C195-147 Declan Dunne’ SD-C195-67 Hermitage Park and SD-C195-69 Siobhan Nolan) note the refusal of a planning application for residential planning in 2020 on this site and welcome and agree with the decision to maintain the zoning of this land as retail warehousing in the Draft South Dublin County Development Plan 2022 - 2028.</p>	<p>Having regard to above figures set out in the Core Strategy and the current excess of zoned land, without the need for further zoning, it is considered that there is sufficient flexibility to meet the household requirements for 2031 and potentially up to 2040. The revised target figures in response to the OPR recommendations, set out separately under the response to the OPR, do not impact on the excess land capacity available to meet the revised targets. Therefore, to re-zone or zone new additional lands over and above those currently set out in the Draft Plan would be contrary to National and Regional planning policy.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p><a href="#">SD-C195-172 Kelland Homes</a></p>	<p>The submission seeks rezoning of lands located south of Elder Health, Tallaght and notes that the northern elements of the subject lands are zoned Objective RES ‘To protect and/ or improve residential amenity’ while the southern section of the subject lands are zoned Objective RU ‘To protect and improve rural amenity and to provide for the development of agriculture’.</p>	<p><b>CE Response:</b></p> <p>The issues raised in the submission are noted.</p> <p>The Core Strategy and Settlement Strategy in Chapter 2 sets out population and housing figures which must be consistent with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) as required under the Planning and</p>

	<p>The submission requests the rezoning of the southern section of the subject lands to RES.</p> <p>The submission highlights that the northern edge of the subject lands' interfaces with the existing Elder Heath homes and a high voltage overhead cable also runs within the Site in an east-west direction along the northern edge.</p> <p>The submission details high level assessments and proposals demonstrating why the subject lands should be rezoned and the benefits:</p> <ul style="list-style-type: none"> <li>• Integration with the recently constructed Elder Heath development;</li> <li>• Retention of existing landscape infrastructure to both retain and enhance localized ecology / bio-diversity;</li> <li>• Facilitation of key strategic connectivity between surrounding community and leisure amenities;</li> <li>• Ability to complement the planned Killinarden masterplan and formation of Elder Park through provision of a strategic green link leading to Kiltipper Park;</li> <li>• Permeability and connectivity, linking into the existing movement networks;</li> <li>• Provide a well-surveilled and easy to navigate movement structure;</li> <li>• Ability to meet the Teir 1 status as it is connected to existing development services via Kelland Homes' Elder Heath development;</li> <li>• Capability to deliver a successful scheme, one that is considered to be highly responsive to both its setting and planning objectives;</li> <li>• Maximize the opportunities for neighbourhood enhancement, improved connectivity, and healthier lifestyles;</li> </ul>	<p>Development Act 2000 (as amended). South Dublin County is anticipated to grow by 46,518 persons with the housing target for the County, as set by Ministerial Guidelines and the NPF Road Map, being 17,817 homes up to 2028. Chapter 2 also confirms that the County has enough land for a further 10,470 units (79%) above the net household need and therefore there is no need to re-zone additional lands or zone new additional lands over and above those currently set out under the current 2016 County Development Plan. Having regard to above figures set out in the Core Strategy and the current excess of zoned land, without the need for further zoning, it is considered that there is sufficient flexibility to meet the household requirements for 2031 and potentially up to 2040. The revised target figures in response to the OPR recommendations, set out separately under the response to the OPR, do not impact on the excess land capacity available to meet the revised targets. Therefore, to re-zone or zone new additional lands over and above those currently set out in the Draft Plan would be contrary to National and Regional planning policy.</p> <p>It is also noted that the subject site is located adjacent to the Killinarden Masterplan Lands which are currently being prepared to enable the full development of zoned land potential of this area. In this regard it is deemed inappropriate and premature to rezone the subject lands.</p> <p>In addition, it is noted that the southern part of the subject lands are currently zoned Rural (RU) – 'To protect and improve rural amenity and to provide for the development of agriculture'. The zoning of the subject lands as objective RU maintains the established visual and environmental buffer between the wider Tallaght Area and the rural hinterland and the policies and objectives of this zoning protect such lands from urban generated development.</p> <p>The submission refers to the high voltage overhead cable, the Carrickmines-Dunstown 220kV transmission line, that runs within the existing zoned RES lands in an east-west direction along the</p>
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	<ul style="list-style-type: none"> <li>• Potential to integrate with surrounding green networks to form stronger links to surround amenities;</li> <li>• Proximity to the surrounding network relation to light rail, bus, car and cycle lanes; and</li> </ul> <p>Masterplan for the subject lands that's allots for 52% residential, 40% green infrastructure, and 8% grey infrastructure.</p>	<p>northern edge of the subject site. Given the high voltage nature of this line there is a requirement of a 60m clearance and safety corridor free from any buildings. It is noted that the existing RES zoning exceeds or 'jumps' the safety corridor into the adjacent subject lands to the south. Therefore, it is considered appropriate that the zoning map be amended to accurately reflect 60m clearance and safety corridor and where the RES zone extends south beyond the 60m clearance, it should be rezoned to RU to align with the remaining lands to the south.</p> <p><b>CE Recommendation:</b></p> <p>Amend <b>Map 9</b> to amend the existing zoning of Objective RES - Existing Residential to accurately align with 60m clearance and safety zone of the existing Carrickmines-Dunstown 220kV transmission line.</p> <p><b>And</b></p> <p>Amend <b>Map 9</b> to rezone where the lands extended south beyond the 60m clearance, Objective RU - <i>'To protect and improve rural amenity and to provide for the development of agriculture'</i> to align with the remaining lands to the south.</p>
<p><b>CE Recommendation:</b></p>		



SD-C195-150 Jones Investments Limited

The submission seeks the rezoning of c. 8.1 ha subject lands located east of Ballycullen Road, Dublin 16 from 'natural amenity'- Objective HA to Objective RES-N and Objective OS, respectively.

The submission considers that this is a positive scenario for both the landowners and the local area/Council as it provides additional land for much needed residential housing and also provides playing pitches for the local area.

The submission puts forward a number of reasons justifying such a rezoning request to include the following:

- Rezoning of the subject lands continues the logical expansion of housing adjacent to Abbots Grove and along Ballycullen Road;

**CE Response:**

The issues raised in the submission are noted.

The submission requests the rezoning of c 8.1 hectares of the subject lands to RES-N and OS to provide for residential units and playing pitches. The Core Strategy and Settlement Strategy in Chapter 2 sets out population and housing figures which must be consistent with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) as required under the Planning and Development Act 2000 (As Amended). South Dublin County is anticipated to grow by 46,518 persons by 2028 with the housing target for the County, as set by Ministerial Guidelines and the NPF Road Map, being 17,817 homes up to 2028. Chapter 2 also confirms that the County has enough land for a further 10,470 units (79%) above the net household need and therefore there is no need to re-zone additional lands or zone new



	<ul style="list-style-type: none"> <li>• Lower density housing on the subject lands is in line with the contours of the site and the Draft Plan;</li> <li>• Subject lands (Parcel A) can provide c. 200 No. units at 40 No. units per hectare (lower density housing).</li> <li>• Provision of much needed housing and an increased quantum of land must be zoned in order to meet the high quantum of homes (33,000) per year that are required as identified in the Housing for All initiative;</li> <li>• Suitable for the sustainable provision of housing due to its proximity to public transport;</li> <li>• Development on the subject lands will 'complete' Ballycullen Road to provide a smoother transition from the urban to the rural;</li> <li>• Parcel B could accommodate 3 No. All Weather/Artificial Grass Pitches (AGP) with specific reference to COS4 Objective 1;</li> <li>• Playing pitches at the southern end of the subject lands will help blend the boundary between the urban and the rural environment along with the retention of hedgerows and trees above the 120 m contour line:</li> <li>• Some 79% of the site resides above the 120 m contour;</li> <li>• Accords with NCBH4 Objective 3 that states that intact hedgerows/trees will be maintained above the 120 m contour line; and</li> </ul> <p>Facilitate public access to two protected structures and to a proposed 'Sites and Monuments Record Zone' to include 19th Century Cross (RPS Ref. No. 360) and St Columbcille's Well (RPS Ref. No. 362) and a Well is a proposed 'Sites and Monuments Record Zone' (Map Ref. R149348) (Recorded Monument and Places Ref. DU022-028).</p>	<p>additional lands over and above those currently set out under the current 2016 County Development Plan.</p> <p>Having regard to above figures set out in the Core Strategy and the current excess of zoned land, without the need for further zoning, it is considered that there is sufficient flexibility to meet the household requirements for 2031 and potentially up to 2040. The revised target figures in response to the OPR recommendations, set out separately under the response to the OPR, do not impact on the excess land capacity available to meet the revised targets. Therefore, to re-zone or zone new additional lands over and above those currently set out in the Draft Plan would be contrary to National and Regional planning policy.</p> <p>Furthermore, the subject lands are currently zoned rural, located at the southern edge of the Dublin City and Suburbs settlement boundary. The core principle of the NPF is compact urban growth through the consolidation of the exiting-built footprint of settlements. The Draft Plan priorities the development of existing zoned lands particularly within MASP growth areas. To re-zone additional lands, especially at the periphery of the County which would continue the sprawl of the urban area towards the mountains is not appropriate.</p> <p>Development which further sprawls the settlement boundary is contrary to the analysis carried out in Chapter 2 having regard to the projected population growth for the Dublin City and Suburbs settlement and parameters under of NSO 1, and NPO 3b. As such, there is no requirement to re-zone additional land for residential purposes to meet the needs of the targeted population increase and thus household need up to 2028.</p> <p>In this context, the rezoning of the subject lands undermines the delivery of households within strategic residential growth sites identified within the Regional Metropolitan Area Strategic Plan at:</p>
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		<p>Adamstown, Clonburris, Tallaght, Naas Road and Fortunestown which would be contrary to National and Regional Planning Policy.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan</p>
<p>SD-C195-289 M. F Dineen</p> <p>SD-C195-290 M. F Dineen</p>	<p>The submission relates to lands located at Slade Lane, Saggart, Co. Dublin where it is proposed to rezone the subject lands from RU to RES-N. It is stated that this zoning would regularise the planning status of the site of 3.9 hectares in size.</p> <p>The submission notes that the sit in question is subject of an enforcement warning letter (ENF: S8487) alleging unauthorised development. The submission highlights that the site is a legacy site that has not had the benefit of zoning or planning and has been used as a plant yard for over 20 years and it is contended that it protected under the 7 year rule. The submission points out that they are working with the council to try to regularise the planning status of the site.</p> <p>The submission goes on to state that recent elevation of housing to the front of the current governments policy agenda has culminated in a comprehensive housing plan to 2030 entitled 'Housing for All. It is submitted that SDCC will need to upscale and update their provision of residential zoned lands to match new housing targets outlined in the plan.</p> <p>The site is bounded on all sides by lands uses that are not agricultural and the site itself is surrounded by ribbon housing development.</p>	<p><b>CE Response:</b></p> <p>The submission relates to lands located at Slade Lane, Saggart, Co. Dublin where it is proposed to rezone the subject lands of 3.9 hectares from RU to RES-N.</p> <p>With regard to regularising the site and current enforcement file on the subject lands, it is noted that it would be premature and inappropriate to comment on such proceedings and they are not a matter for the development plan.</p> <p>The subject lands are zoned RU 'Rural and Agricultural' where it is an objective as per Chapter 13 Implementation and Monitoring Table 13.1 'To protect and improve rural amenity and to provide for the development of agriculture'. It is noted that urban generated housing within the rural area which would be facilitated through this rezoning, would result in and promote urban sprawl of the Dublin City and Suburbs boundary and be contrary to the rural housing guidelines which seek to prevent urban generated housing in rural areas. The core principle of the NPF is compact urban growth through the consolidation of the exiting-built footprint of settlements.</p> <p>The subject lands are located 200m from Saggart Village. In this regard, it should also be noted that revisions have been made to the housing target of Saggart on foot of the level of development and activity likely on lands to North along Mill Road over the plan period. As a result, Saggart is provided with upward revision to the housing target in Table 10: Core Strategy from 96 units to 165 units over the 6-year lifetime of the plan i.e.,2022-2028. The</p>

		<p>response to the OPR dealing with this change is set out separately at the beginning of this report for further details.</p> <p>Therefore, the Draft Plan prioritises the development of existing zoned lands and to re-zone the subject lands, especially at the periphery of the County which would continue the sprawl of the urban area, is not considered appropriate.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan - See recommended changes outlined in the response to the OPR submission at the beginning of this report (SD-195-227) and Appendix 1 with regard to Saggart.</p>
<p>SD-C195-153 Hibernia REIT</p>	<p>The Submission relates to lands at Newlands Farm, Dublin. The submission details its case to rezone the 53 Ha of Objective 'RU' lands at Newlands Farm to Objective 'RES-N' – 'To provide for new residential communities in accordance with approved area plans' and to rezone the 5.7 Ha of Objective 'EE' lands at Newlands Farm to Objective 'REGEN' – 'To facilitate enterprise and/or residential-led regeneration subject to a development framework or plan for the area incorporating phasing and infrastructure delivery,'</p> <p>The submission set out the proposal for the rezoning of the subject lands under the following headings:</p> <p><b>Land and Housing Capacity Report:</b> This Submission submits that the Council has continuously failed to deliver housing over the 18-year period from 2004-2022. It is questioned why such lands continue to be zoned when it is eminently clear that they are highly unlikely to deliver much needed housing over the Plan period.</p> <p>It is noted that the report also raises concerns about the extent of headroom allowed for and the implications of insufficient headroom in exacerbating the imbalance between demand for and supply of housing and considers the risks of</p>	<p><b>CE Response:</b></p> <p>The issues raised are noted and are responded to as follows:</p> <p><b>Core Strategy, Land Capacity and Deliverability</b></p> <p>The Core Strategy and Settlement Strategy in Chapter 2 sets out population and housing figures which must be consistent with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) as required under the Planning and Development Act 2000 (as amended). This confirms that the County has enough land for a further 10,470 units (79%) above the net household need and therefore there is no need to re-zone additional lands or zone new additional lands over and above those currently set out under the current 2016 County Development Plan. Based on general assumptions using the prevailing Ministerial Guidelines, the re-zoning of the subject lands has an estimated potential for c.2-3,000 household units at 35-50 units gross per hectare. This has the potential to increase the excess of zoned lands within the County to accommodate 13,470 units or 102% above the net household need set at a National and Regional plan level. Having regard to above figures set out in the Core Strategy and the current excess of zoned land, without the need for further zoning, it is considered that there is sufficient</p>

	<p>using a household size that is not reflective of the changing population demographics and demonstrates that if a more realistic household size figure of 2.4 is assumed, the amount of zoned land that is needed would be twice the amount that is provided for in the Draft Plan. The submission considers that the core strategy adopts an average household size that is too high and does not reflect current and projected household formation figures.</p> <p><b>Sequential Approach to Zoning:</b> The submission highlights that it is eminently clear the subject lands are being leapfrogged and that the subject lands are much more suitable for residential development than the other 3 No. sites included in the assessment (that are zoned for such development).</p> <p><b>Strategic Location of the Subject Lands:</b> The submission considers that the subject lands at Newlands Farm are strategically positioned to avail of the benefits of high-capacity public transport infrastructure and existing services and facilities and play a major role in increasing permeability and connectivity in the local area. However, the submission highlights that the subject lands largely comprise fragmented farming fields that are inaccessible to the public.</p> <p><b>Retention of the Existing Use:</b> The submission questions why the retention of fragmented zoned agricultural lands is considered appropriate at a location that virtually straddles two Luas stops. The submission suggests that retaining farming use at the subject lands can only contravene all national policy discourse to focus urban growth on Transport Orientated Development (TOD).</p> <p><b>Heritage and Biodiversity:</b> The submission further points out that the subject lands contain two Protected Structures that are in disrepair that are envisioned to be key features of any redevelopment of the lands ensuring their accessibility to</p>	<p>flexibility to meet the household requirements for 2031 and potentially up to 2040. The revised target figures in response to the OPR recommendations, set out separately under the response to the OPR, do not impact on the excess land capacity available to meet the revised targets. Therefore, to re-zone or zone new additional lands over and above those currently set out in the Draft Plan would be contrary to National and Regional planning policy.</p> <p>The methodology for calculating the housing target in the Core Strategy takes account of pent-up demand and historical and ongoing under supply in the delivery of housing. The calculation of the housing target provides for the overall population of South Dublin in accordance with national and regional population allocations, factoring in demand from both existing population and future population.</p> <p>The Land Capacity Audit, which informs the Core Strategy, comprised a very comprehensive review and analysis to calculate the potential yield of undeveloped land (RES, RES-N, TC, REGEN, VC, DC, LC and SDZ) zoned in the 2016 - 2022 County Development Plan. Zoned land with extant permission not commenced (estimated 6,517 units) has been recognised and factored into the Core Strategy figure. In considering such extant permissions a deliverability analysis has also been carried out and has informed the development of the Core Strategy. In addition, a rigorous Infrastructure Assessment and Social Infrastructure Audit was carried out that built on the initial Land Capacity Analysis. This assessment gathered pertinent data on identified lands in relation to their infrastructural constraints and requirements in order to differentiate between zoned land that is available for development and zoned land that requires significant further investment in services for infrastructure for development to be realised. This identifies the assets in each settlement and opportunities to ensure further growth is provided for in tandem with social and physical infrastructure.</p>
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	<p>the public and longevity into the future. The submission emphasises that the subject lands are not a greenbelt but in fact it is contended that they largely provide agricultural lands that are farmed and are inaccessible to the public. The submission points out that JBA Consulting Ecologists surveyed the site on two occasions and confirmed that 'No sightings of protected species were recorded'.</p> <p><b>Infrastructure Assessment:</b> A Water Infrastructure Assessment Report, Preliminary Traffic Assessment, and an Utility Assessment Report has been prepared by OCSC Consulting Engineers and accompanies this submission to indicate that the subject lands are serviced.</p> <p><b>Master Plan Vision and Community Benefits:</b> The submission details a Masterplan vision for the lands which includes extensive open spaces to provide a community connected by green links including a substantive east/west aligned green corridor which is intended to provide a physical buffer and a major amenity to existing communities in Kingswood.</p>	<p>It should be recognised that South Dublin County has a physical excess of zoned lands to meet the population and housing targets set out under national and regional policy. These lands are located, for the most part, within existing built-up areas in Dublin City and Suburbs and will, therefore, support compact growth. In support of the compact growth agenda, the Development Plan has placed a significant emphasis on deliverability, monitoring, growth, and active land management.</p> <p>In this regard, the Draft Plan acknowledges the need for the delivery of a compact growth agenda and includes a range of measures which promote development including: Policy CS3: Monitoring Population and Housing Growth and associated objectives (<i>See recommended changes outlined in the response to the OPR submission at the beginning of this report (SD-195-227) with regard to CS3 Objective 3</i>).; Policy CS4: Active Land Management and associated objectives; Policy CS6: Settlement Strategy - Strategic Planning Principles and associated objectives; and Policy CS7: Consolidation Areas within the Dublin City and Suburbs Settlement and associated objectives.</p> <p>Furthermore, it is noted that in the submission made by the Office of the Planning Regulator (OPR), it is recognised that the core strategy has attempted to strike a balance between having an excess of zoned land and being able to deliver new development and they welcome the inclusion of policies and objectives for the monitoring and delivery of the same.</p> <p>Having regard to the above context, it is considered that a transparent evidence-based approach has been put forward in the Draft Plan which allows for a degree of flexibility within the core strategy under the specific parameters. It is therefore considered that the Draft Plan provides the appropriate balance between monitoring and promoting the deliverability and development of lands zoned within the County within the lifetime of the Plan.</p>
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		<p><b>Household Size</b></p> <p>The 'Housing Supply Target Methodology for Development Planning', December 2020 calculations (Supply Guidelines) published by the Department of Housing and Local Government and Heritage (DHLGH) provides for a household size of 2.74 by 2028. The calculation of the housing target in the Draft Plan calculates a housing requirement to provide for the overall population of the County which factors in demand from both existing population and future population. The NPF indicates that the average household size in 2016 of 2.75 persons per household is expected to decline to 2.5 persons by 2040 resulting in an average household size decline of 0.01. persons per year over the 24-year period up to 2040.</p> <p>Thus, the application of a household size across all households in the County of 2.74 is an assumed correlation between increasing housing supply and decreasing household size and is considered appropriate and in accordance with the HST methodology. It is assumed that in the medium to long term, the average number of persons in private households will once again decline due to wider demographic trends. As a result, it is expected that the average number of persons in private households in South Dublin will progress towards the 2.75 level seen in the Dublin City Council area by 2028 and as provided for in the NPF.</p> <p><b>Headroom</b></p> <p>The RSES, guided by the NPF Roadmap (the Roadmap), has set population projections for the region up to 2026 and 2031 as outlined within Appendix B. In terms of 'Headroom', the Roadmap indicates that an additional 50% growth is already accounted for in the National population targets up to 2026. Thus, the application of 50% growth beyond the Plan period is already accounted for in the targets which the Draft Plan is aligned with.</p> <p><b>Rezoning of Employment Land to REGEN</b></p>
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		<p>The submission seeks to rezone the current EE zoning on lands to the northeast of the site. Based on an assessment of employment on existing zoned land, there is potential for 31,824 jobs assuming an average of 51 jobs per hectare. In addition to this, there are 425ha of Regeneration (REGEN) zoned brownfield land forming part of the Tallaght Town Centre LAP and the Naas Road area, lands which are located in close proximity to the subject lands. While the zoned Regen lands currently provide a relatively low density of employees to land area, the zoning and associated planned development will provide for re-intensification to accommodate higher density employment through a mix of uses.</p> <p>It is important that there is a balance mix of employment opportunity within the County and that the needs of different businesses are met. In this regard, there is sufficient land zoned for Regen in the County at this time and the current zoning of EE on the subject lands should remain.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan</p>
<p><a href="#">SD-C195-183 Manahan Planners</a></p>	<p>The submission requests that the current EE zoning of the site be changed to RES-N zoning to provide for new residential development on the site. The subject site, Green Isle Business Park, is located to the south of the Green Isle Hotel and adjacent the N7 Naas Road.</p> <p>The submission refers to the Draft Development with specific regard to Clondalkin and housing required. National policy documents such as the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES) are referenced especially in relation to compact growth and intensification of brownfield sites.</p> <p>The submission considers that the employment use generated from this subject site to be considerably small having regard to the low-density design of the business park</p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted and the issues addressed under the following headings:</p> <p><b>Core Strategy and Settlement Strategy</b></p> <p>The Core Strategy and Settlement Strategy in Chapter 2 sets out population and housing figures which must be consistent with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) as required under the Planning and Development Act 2000 (As Amended). South Dublin County is anticipated to grow by 46,518 persons with the housing target for the County, as set by Ministerial Guidelines and the NPF Road Map, being 17,817 homes up to 2028. Chapter 2 also confirms that the County has enough land for a further 10,470 units (79%) above</p>

	<p>and the low intensity employment uses currently contained on site, i.e. car sales, tanning salon.</p> <p>The submission makes reference to another zoning submission i.e (SD-C195-26) whereby it is seeking the same request in relation to changing the EE zoning to residential zoning as three different families and generations reside here and they want to keep these lands in their family for years to come.</p> <p>It is also noted that in conjunction with the other submission on the adjacent site, the residential zoning of these lands will greatly improve the residential amenity of the immediate surrounding area.</p> <p>The submission highlights that the rezoning of these lands to RES-N residential, would allow the development of new residential dwellings on a highly accessible and serviced brownfield site and would form a natural extension to the adjacent residential neighbourhood and support existing services.</p>	<p>the net household need and therefore there is no need to re-zone additional lands or zone new additional lands over and above those currently set out under the current 2016 County Development Plan. Having regard to above figures set out in the Core Strategy and the current excess of zoned land, without the need for further zoning, it is considered that there is sufficient flexibility to meet the household requirements for 2031 and potentially up to 2040. The revised target figures in response to the OPR recommendations, set out separately under the response to the OPR, do not impact on the excess land capacity available to meet the revised targets. Therefore, to re-zone or zone new additional lands over and above those currently set out in the Draft Plan would be contrary to National and Regional planning policy.</p> <p><b>Need for Employment Land</b></p> <p>It is anticipated that South Dublin County will need to cater for an additional 36,678 jobs up to 2040. Having regard to this requirement, the extent and quantum of the lands zoned specifically for employment and to facilitate continued economic development and employment growth in the County over the Plan period, there is an enhanced need to retain and protect the subject lands for employment purposes.</p> <p>It is therefore considered given the location of the subject land to significant REGEN areas and need to protect existing employment zoning, the lands should remain zoned for general employment.</p> <p><b>Suitability of the Subject Lands</b></p> <p>The subject lands, immediately adjacent to the Naas Road (N7) and the existing Green Isle Hotel premises would not appear to be preferable as a residential area. Having regard to the context and character of the subject lands it is considered that the lands would be appropriate to remain as Employment zoning.</p> <p><b>CE Recommendation:</b></p>
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		No change to Draft Plan.
SD-C195-26 Louise Stynes O Connor	Four submissions all request that the current EE zoning of the lands adjoining the Green Isle Hotel backing onto the N7 and fronting onto Boot Road be changed to RES - To protect and/or improve residential amenity and RES-N zoning to provide for new residential development on the site. The submissions relate to residential homes currently on the subject lands at Bedless Hill.	<p><b>CE Response:</b></p> <p>The issues raised in the submissions are noted. The Core Strategy and Settlement Strategy in Chapter 2 sets out population and housing figures which must be consistent with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) as required under the Planning and Development Act 2000 (As Amended). South Dublin County is anticipated to grow by 46,518 persons with the housing target for the County, as set by Ministerial Guidelines and the NPF Road Map, being 17,817 homes up to 2028. Chapter 2 also confirms that the County has enough land for a further 10,470 units (79%) above the net household need and therefore there is no need to re-zone lands or zone new additional lands over and above those currently set out under the current 2016 County Development Plan.</p> <p>Moreover, the current excess of zoned land, without the need for further zoning, is considered to provide sufficient flexibility to meet the household requirements for 2031 and potentially up to 2040.</p> <p>With respect to the existing residential uses on site, it noted that Section 13.1.1' Land-Use Zoning Tables', (vi) Non-Conforming Uses of the Draft Plan states '<i>there are instances throughout the County where land uses do not conform with the zoning objective of a site. These include instances where such uses: 1. were in existence on 1st October 1964 (i.e. prior to planning legislation), or 2. have valid permission, or 3. have no permission and may or may not be the subject of enforcement proceedings. Development proposals that relate to uses referred to under categories 1 and 2 above, particularly those that would intensify non-conforming uses, will be permitted only where the proposed development would not be detrimental to the amenities of the surrounding area and would accord with the principles of proper planning and sustainable development. This includes the integration of land use and transport planning.</i>'</p>
SD-C195-66 linda Quinn	The submissions highlight the following key points:	
SD-C195-155 Brendan Stynes	<ul style="list-style-type: none"> <li>• Personal and ancestral ties to the subject sites and the Clondalkin area;</li> <li>• Historical significance of the land;</li> <li>• That they wish to keep this land as their residential family land for years to come;</li> <li>• The subject lands have been purely residential and there have never been any use of same for Enterprise and Employment purposes; and</li> <li>• Highlight the Sheet Map 04 the lands are zoned EE despite being residential and indicate that the lands in question sits between the Green Isle Business Park (part of which is also residential with numerous tenants) and the Green Isle Hotel.</li> </ul>	
SD-C195-148 Rebecca O Connor	It is noted that the area between the Green Isle Hotel and the Green Isle Business Park contains three separate family residents, which are in the current residents' families for generations. However, it is submitted that the area containing their family homes are all highlighted incorrectly as being a part of the 'Green Isle Business Park', which is incorrect. The submissions request this apparent error or oversight to be rectified and rezoned residential to allow for future generations of their families to reside there and have the options to extend, redevelop the properties or build new	

	homes as necessary without the restrictions that would be imposed by a commercial zoning Objective such as EE.	<p>Having regard to the function and existence of residential properties at these locations and the provisions of Section 13.1.1 (vi) in the Draft Plan, it is noted that potential residential use associated with the existing dwellings would be permitted/open for consideration and that the EE zoning does not prevent the existing houses from remaining.</p> <p>It is recognised that new residential units would not be permitted within the EE zoning. However, the potential for more cohesive EE zoning uses in this area would be lost should smaller areas of RES or RES-N be provided for on an ad-hoc basis.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
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<b>Residential Zoning Submission - Rathcoole Woodlands</b>		
<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation</b>
<p>SD-C195-68 Peter Meighan</p> <p>SD-C195-71 Kamila KOZLOWSKA</p> <p>SD-C195-72 Gordon Place</p> <p>SD-C195-85 Joe Magee</p> <p>SD-C195-94 Georgina McDermott</p> <p>SD-C195-96 Frances Mallon</p> <p>SD-C195-101 Vincent Tsoi</p>	<p>Amend CS10 Rathcoole SLO 1 as outlined below:</p> <p>To investigate the potential for alternative land uses for the lands currently zoned RES-N (To provide for new residential communities in accordance with approved area plans) and OS (To preserve and provide for open space and recreational amenities) as identified by the SLO on the CDP land use zoning map, having regard to protecting existing annex habitats of Alluvial Woodland, Lowland Hay Meadow, Petrifying Springs and biodiversity rich non-annex habitats of orchid rich and species rich grasslands, and heritage hedgerows, Biodiversity and the Rathcoole Woodlands ,GI7 Objective 3 and 4, the need for social and affordable housing, community infrastructure and access. Following this assessment, and where alternative land use arrangements are identified in line with the proper planning and sustainable</p>	<p><b>CE Response:</b></p> <p><b>Zoning and Land Use</b></p> <p>The content of multiple submissions relating to Rathcoole Woodlands area and its environs are noted. Where issues relate directly to comments on TPOs or green infrastructure they have been dealt with in the sections relating to the chapters on Natural Cultural and Built Heritage (TPOs) and Green Infrastructure respectively. The body of the submissions in this section relate to the protection of the woodlands and to CS10 SLO1 of the Draft Plan which committed to investigating alternative uses for the relevant lands.</p> <p>The provisions of CS10 SLO 1 of the Draft Plan as stated below are noted.</p>

SD-C195-165 Kerron Ó Luain	development of the area, to bring forward proposals for re-zoning including the establishment of a new land use zoning High Amenity-Camac Valley/Rathcoole Woodlands, 'HA – RW' if deemed appropriate within the lifetime of this plan'	<p>CS10 SLO 1:</p> <p><i>“To investigate the potential for alternative land uses for the lands currently zoned RES-N (To provide for new residential communities in accordance with approved area plans) and OS (To preserve and provide for open space and recreational amenities) as identified by the SLO on the CDP land use zoning map, having regard to protecting existing habitats, Biodiversity and the Rathcoole Woodlands, the need for social and affordable housing, community infrastructure and access. Following this assessment, and where alternative land use arrangements are identified in line with the proper planning and sustainable development of the area, to bring forward proposals for re-zoning”.</i></p> <p>The following Draft Plan objective relating to Rathcoole is also noted;</p> <p><b>CS10 Objective 1</b> states as follows:</p> <p><i>“To facilitate the commencement and completion of development on zoned residential lands within and contiguous to the settlement boundary of Rathcoole which recognises natural heritage assets and facilitates connections to the village core and other areas to provide for active travel opportunities”.</i></p> <p>On foot of this SLO the Council commissioned a team to support the preparation of the ‘Rathcoole Lands: Land Use Concept and Zoning Proposals’ to inform future development in the area. This is included in Appendix 2A of this CE Report. The land use concept and zoning proposal is informed by ecological assessments which are now complete and included in Appendix 2B.</p> <p>The concept and zoning proposals document seeks to address the SLO and the issues raised in submissions relating to the future development of the lands and the potential impact on the biodiversity and amenity of the area including the identified Annex 1 sites.</p>
SD-C195-191 Debbie Garrett		
SD-C195-190 Joan Brennan	In addition to the amended SLO stated above submissions request the following:	
SD-C195-199 Sally Graver	-Preserve and protect the whole area with an appropriate management plan put in place in the 2022-2028 South Dublin County Development Plan.	
SD-C195-220 Niall Healy		
SD-C195-252 Cllr Trevor Gilligan PC	- Preserve the entire area of CS10 SLO1 and designate it a High Amenity Area with overarching policies for protection and preservation.	
SD-C195-278 Seán Healy		
SD-C195-270 alistair mullan	-Should it prove that none or only a small area can be developed in CS10 SLO 1 that a new zoning objective is established; Zoning Objective High Amenity-Camac Valley/Rathcoole Woodlands and environs, 'HA –CV/RW' for the undeveloped area.	
SD-C195-248 Four Districts Woodland Habitat Group		
SD-C195-255 Ne Graver	-Put in place measures to protect and preserve Rathcoole Woodland/ Camac Valley and environs for present and future generations as part of the new zoning objective:	
SD-C195-196 Ne Graver	designate the area as a nature reserve, obtain a Special Amenity Area Order for the area and if appropriate nominate it as a candidate Special Area of Conservation or Natural Heritage Area by bringing it to the attention of NPWS.	
SD-C195-102 Orla Daly		
SD-C195-280 Susan Healy		
SD-C195-269 John O'Leary	-Include the setting of a Natural, Cultural and Built Heritage (NCBH) policy for Rathcoole Woodlands and its environs: to protect and enhance the outstanding natural character and amenity of Rathcoole Woodlands and its environs, including its landscape, visual, recreational, ecological, educational and historical heritage value, as a key element of the County's Green Infrastructure network.	
SD-C195-285 Eugene McElhinney		
SD-C195-266 Christine Noonan		

<p>SD-C195-109 South Dublin Conservation Society</p>	<p>- Extend the public owned lands containing Rathcoole Woodlands, either by direct purchase or land swap to incorporate the Woodland in adjacent land, the historical 170 year old double hedged passage to the west, and transitional zone from Woodland to managed park land to the east.</p> <p>- Incorporate all of Rathcoole Woodlands as is, with minimal management into Rathcoole Park.</p> <p>- Recognise Rathcoole Woodlands as being the first Native Woodland resulting from re-wilded agriculture land. One of a kind.</p> <p>- There is a need for a public/private approach (pathway) which could deliver these houses without compromising the woodlands.</p> <p>In addition the following is noted:</p> <p>Welcomes CS10 SLO1 to explore alternative land uses for the lands zoned RES-N and OS at Rathcoole, but urges the Council to reconsider its plans to remove these trees and allow house construction and to rezone these lands to OS or High Amenity.</p> <p>- Similar policies are already included for the protection of the Liffey Valley Special Amenity Area Order area. NCBH 7 Objectives 6 and 7.</p> <p><b>Quality of Rathcoole Woodlands</b></p> <p>Multiple submissions express deep concern about the threat to Rathcoole Woodlands presented by proposals to provide residential development on the site. The following qualities of the site are noted.</p> <p>- The site includes annex and non-annex habitats, of woodland, scrub and grassland, hedgerows, streams and</p>	<p>In the current SDCC development plan (2016-2022) the lands included in the study area are zoned RES-N (New Residential) – ‘to provide for new residential communities in accordance with approved area plans’ and OS (Open Space) – ‘to preserve and provide for open space and recreational facilities’ with a small area along the boundary to the southwest zoned RU – ‘to protect and improve rural amenity and to provide for the development of agriculture’. This is shown in Figure 1 below.</p> <p><b>Proposed Zoning Amendments</b></p> <p>The work undertaken on foot of the SLO in the Draft Plan has resulted in a new zoning and land use approach. The proposal now provides for:</p> <ul style="list-style-type: none"> <li>• An increase in RU zoning – ‘To protect and improve rural amenity and to provide for the development of agriculture’ from circa 1.77ha to 10.26, that will largely replace the current RES-N zoning.</li> <li>• A decrease in RES-N ‘To provide for new residential communities in accordance with approved area plans’ from circa 11.14ha to 8.57ha and the general relocation of this zoned land from its current location</li> <li>• A decrease in Open Space ‘To preserve and provide for open space and recreational amenities’ from 15.21ha to 9.25ha</li> </ul> <p>At this stage, it is only the zoning, related SLO’s and mapping objectives that are subject to the County Development Plan process.</p> <p>However, to arrive at the proposed land use zoning consideration was given to matters raised in the SLO, including, protection of the woodlands, biodiversity and habitats, the need for social and affordable housing, community infrastructure and access. Resulting from those considerations, an indicative land use concept was prepared to understand how the relevant protections and uses could be accommodated within the study area.</p>
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	<p>springs, each valuable in their own right and unique within South Dublin and perhaps the Country.</p> <p>The area contains the following habitat's which are required to protected under the Habitats Directive.</p> <ul style="list-style-type: none"> <li>• Extensive 91EO Annex 1 Priority Alluvial Woodland (Rathcoole Woodland)</li> <li>• Springs with an Affinity to Annex 1 Priority 7220 Petrifying Springs</li> <li>• Extensive 6510 Annex 1 Lowland Hay Meadow. 1 ha is annex lowland hay meadow.</li> </ul> <p>Detailed information is provided on the importance of these habitats quoting that priority habitats are of community importance and that it is a very important find and unusually is a nascent (indicating future possibilities) Alluvial Woodland. Notably these sites are recognised as being at risk. It is noted that the petrifying springs are listed as an Annex 1 Priority Habitat. Submissions note also that the monitoring guidance for Petrifying Springs in Ireland notes that it is essential to preserve its surroundings and the whole hydrological system concerned. It is also noted that designated hay meadows are at risk due to ongoing area losses and changes in agricultural practices amongst other threats.</p> <p>Damage to the Annex sites could have consequences under the Environment Liabilities Directive for unknowingly or willfully destroying the environment and notes that this means;</p> <p>Damage to the Annex sites could have consequences under the Environment Liabilities Directive for unknowingly or willfully destroying the environment and notes that this means;</p>	<p>An indicative land use arrangement and layout is shown in Appendix 2A, however, the detail of any scheme would be subject to a future planning application. The indicative layout shows that the following could be achieved:</p> <ul style="list-style-type: none"> <li>• a loss of 0.4ha of <b>existing</b> alluvial woodland but an <b>increase</b> of 1.8ha new alluvial woodland resulting in a net gain of 1.4ha,</li> <li>• a net loss of 1.4ha of immature woodland but with an overall zero loss of woodland when factoring in the net gain of alluvial woodland;</li> <li>• an increase in hay meadow area by 0.1ha</li> <li>• retention of orchid rich grasslands</li> <li>• 1.6ha school site;</li> <li>• GAA sports pitches 5ha (2 full size pitches and 1 junior pitch)</li> <li>• 180-200 residential units</li> <li>• Vehicular and pedestrian/cycle connections</li> </ul> <p>As outlined above, the proposed zoning changes would facilitate a further 1.8ha of new alluvial woodland within existing 'gap' areas in the woodlands. While there would likely be some loss of immature woodland, it could be retained, in part, along the southern boundary of the lands with areas of new planting to the southeast of the alluvial woodlands. The Annex 1 hay meadow to the northeast of the lands could be increased in its extent to reinforce the riparian corridor. This approach is in line with the Draft Plan <b>Policy NCBH5: Protection of Habitats and Species Outside of Designated Areas</b> which states:</p> <p><i>"Protect and promote the conservation of biodiversity outside of designated areas and ensure that species and habitats that are protected under the Wildlife Acts 1976 to 2018, the Birds Directive 1979 and the Habitats Directive 1992, the Flora (Protection) Order 2015, and wildlife corridors are adequately protected"</i>.</p>
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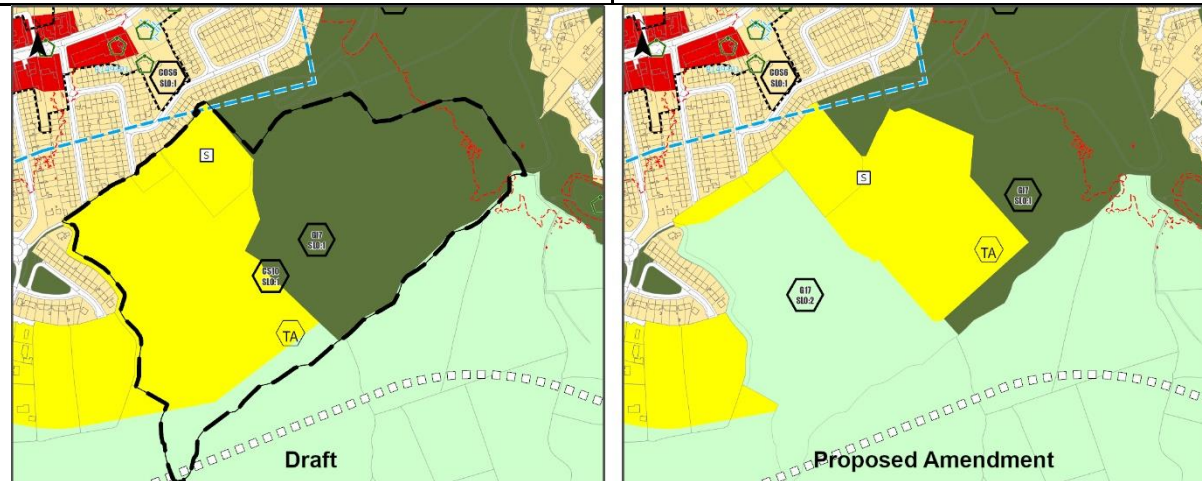
	<p>-Water damage that has significant adverse effects on water status under the Water Framework Directive.</p> <p>- Land damage that creates a significant risk to human health as a result of the direct or indirect introduction, in, on or under land, of substances, preparations, organisms or micro-organisms.</p> <p>Damage to protected species and natural habitats.</p> <p>The Council's own studies acknowledges the presence of these annex habitats but does not mention them in the Draft Plan and notes the following:</p> <p>(a) Woodland is the majority of the site, and the majority of Woodland is 91EO Annex 1 Priority Alluvial Woodland, Rathcoole Woodland.</p> <p>(b) Grassland /Woodland mosaic, or transitional woodland is the second largest component which being contiguous with the 91EO Annex 1 Priority Alluvial Woodland will in time become annex habitat,</p> <p>(c) Grassland is a small portion of the site of which 1 ha is annex lowland hay meadow.</p> <p>The following points are also made:</p> <p>-The area is a wonderful example of a naturally re-wilded woodland, the trees absorb pollutants from the nearby motorway and their roots protect the area from flooding, this is more important now due to climate change and protects homes and businesses. It improves air quality and therefore the health of nearby residents.</p>	<p>In response to the new land use concept, the RES-N zoning has been relocated and reduced by c.2.3 hectares to encompass what would have been previously zoned OS – Open Space. The newly located RES-N lands could provide for approximately 180-200 residential units and a school site (1.6ha) with the remainder of the total 8.6ha of RES-N lands being for access and open spaces.</p> <p>The revised 9.3 hectares of open space zoning could provide for 2 full size and 1 junior size GAA pitch and an associated pavilion with links to the school and the wider Rathcoole Park area. It also contains the orchid rich grasslands along the southern boundary of the site.</p> <p>The majority of the alluvial woodlands have been rezoned as objective RU, it is considered that this zoning accurately reflects the existing rural nature of the lands and places a significant restriction on the possible land-uses addressing many of the concerns raised in submissions.</p> <p>However, to provide for further clarity on the requirement to protect the Annex 1 woodlands, it is considered that a SLO should be placed on the RU lands in this location to read:</p> <p><i>To ensure the protection and augmentation of the identified alluvial woodlands within the zoning RU, and in recognising their value as green infrastructure and the potential linkages to Lugg Woods and Slade Valley and other amenity areas, provide for sensitive passive amenity uses which have regard to their Annex 1 status</i></p> <p>The proposed rezoning and SLO addresses suggestions for the creation of a new zoning objective 'High Amenity-Camac Valley/Rathcoole Woodlands' – to acknowledge the presence of these annex habitats. It is considered that to create a specific high amenity zoning is neither necessary nor appropriate given the small area of lands concerned and the strategic nature of land use zonings. As indicated above, the re-zoning to 'RU' land use zoning with the SLO ensures protection of the woodlands. Some submissions have sought SAO</p>
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	<p>-It provides habitats for wildlife especially our insect population which are in steep decline and upon which ourselves and other species are dependent on.</p> <p>-It gives children the opportunity to access to the wildness of nature where there is a limited supply nationally.</p> <p>-There is sufficient poorer quality land on which to build.</p> <p>-Development on the woodlands would be serious detriment to the village.</p> <p>-Traffic congestion is already outrageous let alone the environmental impact of replacing greenery with concrete.</p>	<p>and/or pNHA etc designations on the lands. pNHAs are proposed by the National Parks and Wildlife Service (NPWS) and it is noted that the RU zoning would not hinder this in any way should such a designation be proposed. Any order for an SAAO designation must be confirmed by An Bord Pleanala as part of a process under Part XIII of the Planning and Development Acts. Again, the RU zoning would not hinder such a designation. It is considered that the proposed rezonings, and the RU zoning with a related specific local objective (SLO) will ensure the protection and augmentation of the woodlands.</p> <p>On foot of the proposed rezonings and SLO, carried out in response to CS10 SLO1 in the Draft Plan, CS10 SLO 1 will no longer be relevant and should be removed.</p> <p><b>CE Recommendation:</b></p> <p>Amend zoning of Rathcoole lands referred to in CS10 SLO 1 in the Draft Plan and as shown in maps set out in Appendix 2A to the CE Report as follows:</p> <ul style="list-style-type: none"> <li>• Zone 8.49 hectares to RU from of RES-N to the west of the lands.</li> <li>• Include the following SLO to read: <b><i>To ensure the protection and augmentation of the identified alluvial woodlands within the zoning RU, and in recognising their value as green infrastructure and the potential linkages to Lugg Woods and Slade Valley and other amenity areas, provide for sensitive passive amenity uses which have regard to their Annex 1 status.</i></b></li> <li>• Zone 5.92 hectares to RES-N from OS zoning to the east of the lands and Include an SLO on phasing to read: <b><i>Ensure the provision of a primary school, library hub, 2 full sized GAA pitches and 1 junior pitch and associated pavilion, access</i></b></li> </ul>
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*road and open space is provided in tandem with new residential development.*

- Relocate the school objective within the revised RES-N lands.
- Relocate the TA objective within the revised RES-N lands.
- Remove CS10 SLO 1 from the Plan.



**Figure 1:** Current Draft Plan Zoning and Proposed Zoning Map, based on land use concept 'Rathcoole Lands: Land Use Concept and Zoning Proposals' prepared by Metropolitan Workshops



Residential Zoning Submission - Newcastle		
Submission No.	Submission Summary	CE response and recommendation
SD-C195-62 Michael Bennett	<p>This submission relates to three parcels of land located at Commons Little, Aylmer Road, Newcastle, County Dublin.</p> <p>The submission requests the rezoning of the three land parcels are zoned from RU to RES-N.</p> <p>The submission outlines a number of reasons as to why the three parcels of land should be rezoned to include the following:</p> <ul style="list-style-type: none"> <li>• Unused farmland that is strategically located to an adjacent housing development;</li> <li>• Subject land is already serviced with wastewater pipework, multiple access/egress points and is located to nearby existing and proposed transport links;</li> <li>• Benefit of enhanced future access with the proposed new distributor road;</li> <li>• Subject lands are freehold and unencumbered apart from the Wayleave in favour of SDCC;</li> <li>• Comprise of a well-defined mature tree/hedgerow boundary between the neighbouring farmland;</li> <li>• CFRAM process has determined that the Baldonnel AFA is considered as low level of flood risk and it is emphasised that the subject lands have never suffered flooding; and</li> </ul> <p>Refers to the Land Development Agency (LDA) submission from the Strategic Issues Public Consultation and how the Council shall ensure that the maximum amount of suitable land is zoned for development to help deliver the projected housing needs.</p>	<p><b>CE Response:</b></p> <p>The submission requests the rezoning of three parcels of land to RES-N located at Commons Little, Aylmer Road, Newcastle. The subject lands are currently zoned RU – “<i>To protect and improve rural amenity and to provide for the development of agriculture</i>”.</p> <p>As a result of the submission (SD-195-227) from the Office of the Planning Regulator (OPR) and the Planning Authority’s response to the same in relation to Newcastle, this response and recommendation will be dealt with in two parts as follows:</p> <p><b>Part A:</b></p> <p>The Core Strategy and Settlement Strategy in Chapter 2 sets out population and housing figures which must be consistent with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) as required under the Planning and Development Act 2000 (As Amended). South Dublin County is anticipated to grow by 46,518 persons with the housing target for the County, as set by Ministerial Guidelines and the NPF Road Map, being 17,817 homes up to 2028. Chapter 2 also confirms that the County has enough land for a further 10,470 units (79%) above the net household need and therefore there is no need to re-zone additional lands or zone new additional lands over and above those currently set out under the current 2016 County Development Plan. Having regard to above figures set out in the Core Strategy and the current excess of zoned land, without the need for further zoning, it is considered that there is sufficient flexibility to meet the household requirements for 2031 and potentially up to 2040. The revised target figures in response to the OPR recommendations, set out separately under the response</p>

		<p>to the OPR, do not impact on the excess land capacity available to meet the revised targets.</p> <p><b>Part B:</b></p> <p>In line with recommendations of submission SD-195-227 Office of the Planning Regulator (OPR), an examination has been carried out of the residential capacity and requirements of the Newcastle Area on foot of a revised housing target over the Plan period. This has resulted in a reduced housing target of 17,817 to 15,576 for the County. Arising from this reduced housing target a sequential approach has been applied to the zoning and phasing of lands in Newcastle to ensure the delivery of necessary infrastructure in accordance with NPO 9 of the National Planning Framework (NPF).</p> <p>This has resulted in the following changes to the land use zoning map for Newcastle:</p> <ul style="list-style-type: none"> <li>• Phase 1 Lands: Phase 1 residential lands to be delivered in tandem with the delivery of key infrastructure specific to the subject lands: <ul style="list-style-type: none"> <li>– <u>Burgage North Block 1:</u> Development to be carried out in tandem with the delivery of 2 new street connections to main street and the provision of a new local park c. 0.3ha.</li> <li>– <u>Burgage North Block 2:</u> Development to be carried out in tandem with the delivery of lands to facilitate an extension to St. Finian’s Community Centre.</li> <li>– <u>Burgage South/Taobh Chnoic Block 3:</u> A sequentially phased programme to be submitted alongside any planning application on the subject lands which provides for the delivery of the following in tandem with development or as described 1) No more than 200 units to be permitted before the commencement of the remaining lands of c. 1.4ha to provide for the full Taobh Chnoic Park to the south 2) Urban Park/Square c. 1ha in</li> </ul> </li> </ul>
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		<p>size (Burgage South Park), 3) East-West Link Street, 4) Sean Feirm Park c. 0.2ha in size, 5) a portion of Tower House Park c. 0.1ha. All applications shall demonstrate to the satisfaction of the Planning Authority how they are supporting the delivery of North South Street connections to the Main Street.</p> <ul style="list-style-type: none"> <li>- With regards delivery of a new primary school at Taobh Chnoic, the timing of this will be subject to educational needs in consultation with the Department of Education. Prior to completion of 200 units confirmation to be provided from the Department of Education on the transfer of lands to provide for the school, subject to their confirmation of need.</li> </ul> <ul style="list-style-type: none"> <li>• Phase 2 Lands: To only facilitate the delivery of Phase 2 residential lands once identified infrastructure comprising of the Urban Park/Square c. 1ha in size, the additional 1.4ha for Taobh Chnoic Park and the East/West Link Street required within Phase 1 have been delivered to the satisfaction of the Planning Authority.</li> <li>• The zoning map for the area now comprises of Phase 1 lands and Phase 2 lands both of which will be indicated by an SLO, lands identified as Strategic Residential Reserve which will be displayed on the development plan map as an objective to read: <i>'To protect and safeguard strategic residential reserve lands for potential future residential growth beyond the lifetime of the plan'</i>.</li> <li>• The redesignation of lands to the west along the Kilteel road from Res-N to RU.</li> </ul> <p>See response to OPR submission at the beginning of this report for further details.</p> <p><b>CE Recommendation:</b></p>
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		<p><b>Part A:</b> No change to Draft Plan.</p> <p><b>Part B:</b> See recommended changes outlined in the response to the OPR submission at the beginning of this report (SD-195-227) and Appendix 1.</p>
<p>SD-C195-134 Simon Clear &amp; Associates</p>	<p>The submission notes that the subject lands are located at Newcastle, off Peamount Road and are primarily zoned RU - <i>To protect and improve rural amenity and to provide for the development of agriculture</i>. It is also pointed out that parts of the lands are zoned Objective RES, Objective VC and Objective RES-N.</p> <p>The submission requests that the portion of the subject lands which are zoned RU be rezoned to RES-N.</p> <p>The submission outlines a number of reasons as to why the subject lands should be rezoned to include the following:</p> <ul style="list-style-type: none"> <li>• Located within 250m of the growth town centre and are within 3km of new employment opportunities;</li> <li>• Provide a greater degree of mixed-use or compatible zoning will be more sustainable;</li> <li>• Can achieve Tier 1 categorisation, with access to all amenities and employment locations by foot or bicycle and no need for long commutes;</li> <li>• Subject lands are not located within any controlled Air Space; and</li> <li>• Can contribute to sustainable residential development in an established urban centre adjacent to major employment centres.</li> </ul> <p>The submission considers that the draft plan does not allow for Rathcoole and Newcastle to expand significantly, and it is considered that a mono-zoning pattern will emerge as well as a new commuting pattern due to the location of industry in regen locations at Tallaght and the M50.</p>	<p><b>CE Response:</b></p> <p>The submission requests the rezoning land to RES-N located at Peamount Road, Newcastle. The subject lands are currently zoned RU – <i>“To protect and improve rural amenity and to provide for the development of agriculture”</i> however it is noted that parts of the subject lands are zoned Objective RES, Objective VC and Objective RES-N.</p> <p>As a result of the submission (SD-195-227) from the Office of the Planning Regulator (OPR) and the Planning Authority’s response to the same in relation to Newcastle, this response and recommendation will be dealt with in two parts as follows:</p> <p><b>Part A:</b></p> <p>The Core Strategy and Settlement Strategy in Chapter 2 sets out population and housing figures which must be consistent with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) as required under the Planning and Development Act 2000 (As Amended). South Dublin County is anticipated to grow by 46,518 persons with the housing target for the County, as set by Ministerial Guidelines and the NPF Road Map, being 17,817 homes up to 2028. Chapter 2 also confirms that the County has enough land for a further 10,470 units (79%) above the net household need and therefore there is no need to re-zone additional lands or zone new additional lands over and above those currently set out under the current 2016 County Development Plan. Having regard to above figures set out in the Core Strategy and the current excess of zoned land, without the need for further zoning, it is considered that there is sufficient flexibility to meet the household requirements for 2031 and</p>

	<p>The submission requests that the strategy for growth and population allocation for Newcastle be reconsidered.</p>	<p>potentially up to 2040. The revised target figures in response to the OPR recommendations, set out separately under the response to the OPR, do not impact on the excess land capacity available to meet the revised targets.</p> <p><b>Part B:</b></p> <p>In line with recommendations of submission SD-195-227 Office of the Planning Regulator (OPR), an examination has been carried out of the residential capacity and requirements of the Newcastle Area on foot of a revised housing target over the Plan period. This has resulted in a reduced housing target of 17,817 to 15,576 for the County. Arising from this reduced housing target a sequential approach has been applied to the zoning and phasing of lands in Newcastle to ensure the delivery of necessary infrastructure in accordance with NPO 9 of the National Planning Framework (NPF).</p> <p>This has resulted in the following changes to the land use zoning map for Newcastle:</p> <ul style="list-style-type: none"> <li>• Phase 1 Lands: Phase 1 residential lands to be delivered in tandem with the delivery of key infrastructure specific to the subject lands: <ul style="list-style-type: none"> <li>– <u>Burgage North Block 1:</u> Development to be carried out in tandem with the delivery of 2 new street connections to main street and the provision of a new local park c. 0.3ha.</li> <li>– <u>Burgage North Block 2:</u> Development to be carried out in tandem with the delivery of lands to facilitate an extension to St. Finian's Community Centre.</li> <li>– <u>Burgage South/Taobh Chnoic Block 3:</u> A sequentially phased programme to be submitted alongside any planning application on the subject lands which provides for the delivery of the following in tandem with development or as described 1) No more than 200 units to be permitted before the commencement of the</li> </ul> </li> </ul>
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		<p>remaining lands of c. 1.4ha to provide for the full Taobh Chnoic Park to the south 2) Urban Park/Square c. 1ha in size (Burgage South Park), 3) East-West Link Street, 4) Sean Feirm Park c. 0.2ha in size, 5) a portion of Tower House Park c. 0.1ha. All applications shall demonstrate to the satisfaction of the Planning Authority how they are supporting the delivery of North South Street connections to the Main Street.</p> <ul style="list-style-type: none"> <li>- With regards delivery of a new primary school at Taobh Chnoic, the timing of this will be subject to educational needs in consultation with the Department of Education. Prior to completion of 200 units confirmation to be provided from the Department of Education on the transfer of lands to provide for the school, subject to their confirmation of need.</li> </ul> <ul style="list-style-type: none"> <li>• Phase 2 Lands: To only facilitate the delivery of Phase 2 residential lands once identified infrastructure comprising of the Urban Park/Square c. 1ha in size, the additional 1.4ha for Taobh Chnoic Park and the East/West Link Street required within Phase 1 have been delivered to the satisfaction of the Planning Authority.</li> <li>• The zoning map for the area now comprises of Phase 1 lands and Phase 2 lands both of which will be indicated by an SLO, lands identified as Strategic Residential Reserve which will be displayed on the development plan map as an objective to read: <i>'To protect and safeguard strategic residential reserve lands for potential future residential growth beyond the lifetime of the plan'</i>.</li> <li>• The redesignation of lands to the west along the Kilteel road from Res-N to RU.</li> </ul>
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		<p>See response to OPR submission at the beginning of this report for further details.</p> <p><b>CE Recommendation:</b></p> <p><b>Part A:</b> No change to Draft Plan.</p> <p><b>Part B:</b> See recommended changes outlined in the response to the OPR submission at the beginning of this report (SD-195-227) and Appendix 1.</p>
<p><a href="#">SD-C195-86 Alanna Homes Limited</a></p>	<p>This submission seeks the rezoning of 17.4 acres (7.04 ha) of lands located at Cornerpark, Newcastle, Co. Dublin.</p> <p>The submission requests rezoning the subject lands from “RU – To protect and improve rural amenity and to provide for the development of agriculture” to objective “RES – To protect and/or improve residential amenity”.</p> <p>It is submitted that the subject lands form part of a larger landholding, part of which is zoned ‘RES’ and currently under development (reg. ref. SD19A/0040 refers).</p> <p>The submission outlines a number of points as to why the subjects should be rezoned to include the following:</p> <ul style="list-style-type: none"> <li>• Subject lands adjoin existing built-up area;</li> <li>• Development on subject lands complies with the sequential approach;</li> <li>• Residential zoning is consistent with the ‘10-minute settlement concept’;</li> <li>• Subject lands adjoining the core of Newcastle village and residential development is essential in achieving viable, compact and sustainable urban growth;</li> <li>• Subject lands could accommodate a large public open space area aiding carbon sequestration/green infrastructure which is considered to be significantly</li> </ul>	<p><b>CE Response:</b></p> <p>The submission requests the rezoning of 17.4 acres (7.04) land to RES located at Cornerpark, Newcastle. The subject lands are currently zoned RU – “<i>To protect and improve rural amenity and to provide for the development of agriculture</i>”.</p> <p>As a result of the submission (SD-195-227) from the Office of the Planning Regulator (OPR) and the Planning Authority’s response to the same in relation to Newcastle, this response and recommendation will be dealt with in two parts as follows:</p> <p><b>Part A:</b></p> <p>The Core Strategy and Settlement Strategy in Chapter 2 sets out population and housing figures which must be consistent with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) as required under the Planning and Development Act 2000 (As Amended). South Dublin County is anticipated to grow by 46,518 persons with the housing target for the County, as set by Ministerial Guidelines and the NPF Road Map, being 17,817 homes up to 2028. Chapter 2 also confirms that the County has enough land for a further 10,470 units (79%) above the net household need and therefore there is no need to re-zone additional lands or zone new additional lands over and above those currently set out under the current 2016 County Development Plan. Having regard to above figures set out in the</p>

	<p>lacking in Newcastle and providing a much-needed community facility; and</p> <p>Subject lands are accessible, serviced by public transport, fully infrastructurally serviced and not prone to flooding.</p>	<p>Core Strategy and the current excess of zoned land, without the need for further zoning, it is considered that there is sufficient flexibility to meet the household requirements for 2031 and potentially up to 2040. The revised target figures in response to the OPR recommendations, set out separately under the response to the OPR, do not impact on the excess land capacity available to meet the revised targets.</p> <p><b>Part B:</b></p> <p>In line with recommendations of submission SD-195-227 Office of the Planning Regulator (OPR), an examination has been carried out of the residential capacity and requirements of the Newcastle Area on foot of a revised housing target over the Plan period. This has resulted in a reduced housing target of 17,817 to 15,576 for the County. Arising from this reduced housing target a sequential approach has been applied to the zoning and phasing of lands in Newcastle to ensure the delivery of necessary infrastructure in accordance with NPO 9 of the National Planning Framework (NPF).</p> <p>This has resulted in the following changes to the land use zoning map for Newcastle:</p> <ul style="list-style-type: none"> <li>• Phase 1 Lands: Phase 1 residential lands to be delivered in tandem with the delivery of key infrastructure specific to the subject lands: <ul style="list-style-type: none"> <li>– <u>Burgage North Block 1</u>: Development to be carried out in tandem with the delivery of 2 new street connections to main street and the provision of a new local park c. 0.3ha.</li> <li>– <u>Burgage North Block 2</u>: Development to be carried out in tandem with the delivery of lands to facilitate an extension to St. Finian's Community Centre.</li> <li>– <u>Burgage South/Taobh Chnoic Block 3</u>: A sequentially phased programme to be submitted alongside any planning application on the subject lands which provides</li> </ul> </li> </ul>
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		<p>for the delivery of the following in tandem with development or as described 1) No more than 200 units to be permitted before the commencement of the remaining lands of c. 1.4ha to provide for the full Taobh Chnoic Park to the south 2) Urban Park/Square c. 1ha in size (Burgage South Park), 3) East-West Link Street, 4) Sean Feirm Park c. 0.2ha in size, 5) a portion of Tower House Park c. 0.1ha. All applications shall demonstrate to the satisfaction of the Planning Authority how they are supporting the delivery of North South Street connections to the Main Street.</p> <ul style="list-style-type: none"> <li>- With regards delivery of a new primary school at Taobh Chnoic, the timing of this will be subject to educational needs in consultation with the Department of Education. Prior to completion of 200 units confirmation to be provided from the Department of Education on the transfer of lands to provide for the school, subject to their confirmation of need.</li> </ul> <ul style="list-style-type: none"> <li>• Phase 2 Lands: To only facilitate the delivery of Phase 2 residential lands once identified infrastructure comprising of the Urban Park/Square c. 1ha in size, the additional 1.4ha for Taobh Chnoic Park and the East/West Link Street required within Phase 1 have been delivered to the satisfaction of the Planning Authority.</li> <li>• The zoning map for the area now comprises of Phase 1 lands and Phase 2 lands both of which will be indicated by an SLO, lands identified as Strategic Residential Reserve which will be displayed on the development plan map as an objective to read: <i>'To protect and safeguard strategic residential reserve lands for potential future residential growth beyond the lifetime of the plan'</i>.</li> <li>• The redesignation of lands to the west along the Kilteel road from Res-N to RU.</li> </ul>
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		<p>See response to OPR submission at the beginning of this report for further details.</p> <p><b>CE Recommendation:</b></p> <p><b>Part A:</b> No change to Draft Plan.</p> <p><b>Part B:</b> See recommended changes outlined in the response to the OPR submission at the beginning of this report (SD-195-227) and Appendix 1.</p>
<p>SD-C195-175 St. Finian's GAA Club and Mr Con McCarthy</p>	<p>The lands subject to this submission are located to the eastern side of Newcastle and to the west and south of the Newcastle Cemetery and are accessed from the main Lucan to Rathcoole R120 Road. The subject lands are located outside the Newcastle Local Area Plan (LAP) 2012 boundary.</p> <p>The submission outlines two requests which are contingent on each other:</p> <p><b>Item 1:</b> Requests the rezoning of the subject lands from Objective 'RU' - To protect and improve rural amenity and to provide for the development of agriculture to Objective 'RES-N' - To provide for new residential communities in accordance with approved area plans.</p> <p><b>Item 2:</b> Site Specific Local Objective (SLO) to provide leisure and recreational facilities for use by the community.</p> <p><u>Item 1: Rezoning Request</u></p> <p>The submission highlights a number of key reasons why the rezoning of the subject lands is appropriate at this location to include the following:</p> <ul style="list-style-type: none"> <li>• Adjacent multi-uses and subject lands have accessibility through the existing road networks i.e., R120.and provision of public transport in the locale;</li> </ul>	<p><b>CE Response:</b></p> <p>The submission requests the rezoning of 17.4 acres (7.04) land to RES-N located to the eastern side of Newcastle and to the west and south of the Newcastle Cemetery and are accessed from the main Lucan to Rathcoole R120 Road. The subject lands are currently zoned RU – “<i>To protect and improve rural amenity and to provide for the development of agriculture</i>”.</p> <p>As a result of the submission (SD-195-227) from the Office of the Planning Regulator (OPR) and the Planning Authority's response to the same in relation to Newcastle, this response and recommendation will be dealt with in two parts as follows:</p> <p><b>Part A:</b></p> <p>The Core Strategy and Settlement Strategy in Chapter 2 sets out population and housing figures which must be consistent with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) as required under the Planning and Development Act 2000 (As Amended). South Dublin County is anticipated to grow by 46,518 persons with the housing target for the County, as set by Ministerial Guidelines and the NPF Road Map, being 17,817 homes up to 2028. Chapter 2 also confirms that the County has enough land for a further 10,470 units (79%) above the net household need and therefore there is no need to</p>

	<ul style="list-style-type: none"> <li>• Form a natural connection to the Newcastle Cemetery which is currently removed from the Newcastle LAP and provide greater connectivity to this community amenity;</li> <li>• Allow the community of Newcastle to extend to the cemetery to the east of the town – filling in the ‘gap’ in frontage that currently exists;</li> <li>• Subject lands have the potential to provide a full size all weather playing pitch, two basketball courts, dressing rooms, a walking/jogging/cycling track, car parking area and open space;</li> <li>• Delivery of housing is a challenge for South Dublin, and it is argued that the forecasted demand and the actual supply of housing in the County are significantly misaligned;</li> <li>• Lands identified in the Newcastle LAP to be developed for residential have not materialised through the lifetime of the current Development Plan;</li> <li>• Opportunity for the Growth of Newcastle as a Small Town has not been fully harnessed, and the majority of the units envisaged have not been delivered despite the clear housing shortages;</li> <li>• Land banking in Newcastle has prevented the delivery of residential units on substantial tracts of land zoned for development;</li> <li>• Provides the opportunity to contribute to alleviating the ongoing housing crisis;</li> <li>• Workers in the adjacent major employment nodes at Greenogue and Aerodrome Business Parks need accommodation within walking distance of their jobs and that accommodation is not available due to lack of supply; and</li> <li>• Development would represent the natural sequential development of Newcastle in line with National and Regional Planning Policy.</li> </ul>	<p>re-zone additional lands or zone new additional lands over and above those currently set out under the current 2016 County Development Plan. Having regard to above figures set out in the Core Strategy and the current excess of zoned land, without the need for further zoning, it is considered that there is sufficient flexibility to meet the household requirements for 2031 and potentially up to 2040. The revised target figures in response to the OPR recommendations, set out separately under the response to the OPR, do not impact on the excess land capacity available to meet the revised targets.</p> <p>The subject lands are currently zoned rural, located outside the Dublin City and Suburbs settlement boundary. The core principle of the NPF is compact urban growth through the consolidation of the exiting-built footprint of settlements. The Draft Plan prioritises the development of existing zoned lands particularly within MASP growth areas and to re-zone additional lands, especially at the periphery of the County which would continue the sprawl of the urban area is not considered appropriate. Development which further sprawls the settlement boundary is contrary to the analysis carried out in Chapter 2 having regard to the projected population growth for the Dublin City and Suburbs settlement and parameters under of NSO 1, and NPO 3b. As such, there is no requirement to re-zone additional land for residential purposes to meet the needs of the targeted population increase and thus household need up to 2028.</p> <p>In this context, the rezoning of the subject lands undermines the delivery of households within strategic residential growth sites identified within the Regional Metropolitan Area Strategic Plan at: Adamstown, Clonburris, Tallaght, Naas Road and Fortunestown which would be contrary to National and Regional Planning Policy</p> <p><b>Part B:</b></p> <p>In line with recommendations of submission SD-195-227 Office of the Planning Regulator (OPR), an examination has been carried</p>
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	<p><u>Item 2: Site Specific Local Objective (SLO)</u></p> <p>The submission considers that there is a significant undersupply of leisure and recreational facilities to serve the growing population of Newcastle. Therefore, and dependent on Item 1: Rezoning, the landowner intends to provide approximately 3.2 - 4 Ha of suitable land, in addition to a financial contribution to the delivery of community facilities in the form of GAA facilities and pitches as part of any future residential development on the subject lands.</p> <p>In this regard, the landowner is happy to accept a Strategic Local Objective (SLO) on the subject lands to require the community facilities to be delivered in tandem with the residential development.</p> <p>The submission contends that the provision of community infrastructure in the form of Playing Pitches and associated infrastructure is in line with Community Infrastructure (c) Policy 1 Community Centres. A letter from St. Finian's GAA club to its members accompanies this submission discussing the proposal of rezoning and a SLO.</p>	<p>out of the residential capacity and requirements of the Newcastle Area on foot of a revised housing target over the Plan period. This has resulted in a reduced housing target of 17,817 to 15,576 for the County. Arising from this reduced housing target a sequential approach has been applied to the zoning and phasing of lands in Newcastle to ensure the delivery of necessary infrastructure in accordance with NPO 9 of the National Planning Framework (NPF).</p> <p>This has resulted in the following changes to the land use zoning map for Newcastle:</p> <ul style="list-style-type: none"> <li>• Phase 1 Lands: Phase 1 residential lands to be delivered in tandem with the delivery of key infrastructure specific to the subject lands: <ul style="list-style-type: none"> <li>– <u>Burgage North Block 1:</u> Development to be carried out in tandem with the delivery of 2 new street connections to main street and the provision of a new local park c. 0.3ha.</li> <li>– <u>Burgage North Block 2:</u> Development to be carried out in tandem with the delivery of lands to facilitate an extension to St. Finian's Community Centre.</li> <li>– <u>Burgage South/Taobh Chnoic Block 3:</u> A sequentially phased programme to be submitted alongside any planning application on the subject lands which provides for the delivery of the following in tandem with development or as described 1) No more than 200 units to be permitted before the commencement of the remaining lands of c. 1.4ha to provide for the full Taobh Chnoic Park to the south 2) Urban Park/Square c. 1ha in size (Burgage South Park), 3) East-West Link Street, 4) Sean Feirm Park c. 0.2ha in size, 5) a portion of Tower House Park c. 0.1ha. All applications shall demonstrate to the satisfaction of the Planning Authority how they are supporting the delivery of North South Street connections to the Main Street.</li> </ul> </li> </ul>
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		<ul style="list-style-type: none"> <li>- With regards delivery of a new primary school at Taobh Chnoic, the timing of this will be subject to educational needs in consultation with the Department of Education. Prior to completion of 200 units confirmation to be provided from the Department of Education on the transfer of lands to provide for the school, subject to their confirmation of need.</li> </ul> <ul style="list-style-type: none"> <li>• Phase 2 Lands: To only facilitate the delivery of Phase 2 residential lands once identified infrastructure comprising of the Urban Park/Square c. 1ha in size, the additional 1.4ha for Taobh Chnoic Park and the East/West Link Street required within Phase 1 have been delivered to the satisfaction of the Planning Authority.</li> <li>• The zoning map for the area now comprises of Phase 1 lands and Phase 2 lands both of which will be indicated by an SLO, lands identified as Strategic Residential Reserve which will be displayed on the development plan map as an objective to read: <i>'To protect and safeguard strategic residential reserve lands for potential future residential growth beyond the lifetime of the plan'</i>.</li> <li>• The redesignation of lands to the west along the Killeel road from Res-N to RU.</li> </ul> <p>See response to OPR submission at the beginning of this report for further details.</p> <p><b>CE Recommendation:</b></p> <p><b>Part A:</b> No change to Draft Plan.</p> <p><b>Part B:</b> See recommended changes outlined in the response to the OPR submission at the beginning of this report (SD-195-227) and Appendix 1.</p>
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<p>SD-C195-144 CAIRN Plc</p>	<p>The submission focuses on the area of Newcastle where Cairn PLC have a large landholding and have commenced development in February 2020 comprising of 388 new homes with c. 150 already occupied.</p> <p>The submission further states that pre-planning discussions have also commenced on the remaining Carin land to the west of Newcastle accessed primarily from the Athgoe Road. It is intended that an application will be submitted before the making of the new plan and its is envisaged that the subject lands will be developed and completed by early 2025.</p> <p>Cairn PLC set out the following points in regard to the settlement of Newcastle:</p> <ul style="list-style-type: none"> <li>• Supportive of the identification of Newcastle as a Self-Sustaining Growth Town and objectives which will underpin the sustainable development of the area in accordance with this designation and function:</li> <li>• Notes the commentary in the Draft Plan in relation to improvements to public transport including Bus Connects and the electrification of the Kildare Line which will bring high frequency Dart service as far as Hazelhatch station which will benefit Newcastle:</li> <li>• Highlights the inclusion of the 6-year road proposal through the Cairn PLC lands however it is highlighted that the northern east west route is under the control of the Department of Education: and</li> <li>• Notes the detail of QDP14 and requests that a new LAP for Newcastle is prepared.</li> </ul> <p>The submission also notes the inclusion of an SLO which relates to the Department of Education lands and while they are supportive of COS5 SLO1, it is submitted that it is important that this requirement is not decanted to other development areas under Cairns control.</p>	<p><b>CE Response:</b></p> <p>As a result of the submission (SD-195-227) from the Office of the Planning Regulator (OPR) and the Planning Authority's response to the same in relation to Newcastle, this response and recommendation will be dealt with in two parts as follows:</p> <p><b>Part A:</b></p> <p>The support and issues raised in the submission are noted.</p> <p>Section 5.4.1 of the Draft Plan discusses Local Area Plans and states that LAPs will be prepared for areas where new development requires a coordinated approach and in particular for areas that are likely to experience large scale development or that are in need of regeneration. Policy QDP14: Local Area Plans (LAP) specifically seeks to prepare Local Area Plans as appropriate, prioritising areas that are likely to experience large scale residential or commercial development or regeneration.</p> <p>In this regard it noted that there is an existing LAP in place for Newcastle. Newcastle Local Area Plan 2012-2018 and this was extended to 2022.</p> <p>It should be noted that Local Area Plans must be consistent with the policies and objectives of the County Development Plan and ministerial guidelines and/or policy changes will help inform the decision to review existing Local Area Plans. The need to undertake a LAP for Newcastle will be reviewed following the adoption of the new Development Plan. Furthermore, Newcastle has been identified as a Self-Sustaining Town in the Draft Plan and subject to growth. In this regard, Newcastle has policy provisions within the Draft Plan under Policy CS9: Newcastle.</p> <p>With regard to the COS5 SLO1, it noted that this SLO states <i>“To identify and set aside land, ensuring the delivery of the quantum of OS within the general area of the Burgage South Neighbourhood Park as identified in the Newcastle Local Area Plan (2012), and to pursue all means of achieving this including proactive engagement</i></p>
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		<p><i>with stakeholders and through the consideration of planning applications affecting this area.”</i></p> <p>The comments made in relation to the ownership of lands where this is to be located are noted. The SLO indicates a need to work with stakeholders to achieve its delivery.</p> <p>It is noted that Cairn have started the SHD process and at time of writing are within stage 2 of the SHD. It is understood that an east-west route is being proposed within the SHD.</p> <p>The observation of the improved public transport planned to serve Newcastle and the wider area is noted.</p> <p><b>Part B:</b></p> <p>it is noted that in line with recommendations of submission SD-195-227 Office of the Planning Regulator (OPR), an examination has been carried out of the residential capacity and requirements of the Newcastle Area on foot of a revised housing target over the Plan period. This has resulted in a reduced housing target of 17,817 to 15,576 for the County. Arising from this reduced housing target a sequential approach has been applied to the zoning and phasing of lands in Newcastle to ensure the delivery of necessary infrastructure in accordance with NPO 9 of the National Planning Framework (NPF).</p> <p>This has resulted in the following changes to the land use zoning map for Newcastle:</p> <ul style="list-style-type: none"> <li>• Phase 1 Lands: Phase 1 residential lands to be delivered in tandem with the delivery of key infrastructure specific to the subject lands: <ul style="list-style-type: none"> <li>– <u>Burgage North Block 1</u>: Development to be carried out in tandem with the delivery of 2 new street connections to main street and the provision of a new local park c. 0.3ha.</li> </ul> </li> </ul>
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		<ul style="list-style-type: none"> <li>- <u>Burgage North Block 2:</u> Development to be carried out in tandem with the delivery of lands to facilitate an extension to St. Finian's Community Centre.</li> <li>- <u>Burgage South/Taobh Chnoic Block 3:</u> A sequentially phased programme to be submitted alongside any planning application on the subject lands which provides for the delivery of the following in tandem with development or as described 1) No more than 200 units to be permitted before the commencement of the remaining lands of c. 1.4ha to provide for the full Taobh Chnoic Park to the south 2) Urban Park/Square c. 1ha in size (Burgage South Park), 3) East-West Link Street, 4) Sean Feirm Park c. 0.2ha in size, 5) a portion of Tower House Park c. 0.1ha. All applications shall demonstrate to the satisfaction of the Planning Authority how they are supporting the delivery of North South Street connections to the Main Street.</li> <li>- With regards delivery of a new primary school at Taobh Chnoic, the timing of this will be subject to educational needs in consultation with the Department of Education. Prior to completion of 200 units confirmation to be provided from the Department of Education on the transfer of lands to provide for the school, subject to their confirmation of need.</li> </ul> <ul style="list-style-type: none"> <li>• Phase 2 Lands: To only facilitate the delivery of Phase 2 residential lands once identified infrastructure comprising of the Urban Park/Square c. 1ha in size, the additional 1.4ha for Taobh Chnoic Park and the East/West Link Street required within Phase 1 have been delivered to the satisfaction of the Planning Authority.</li> <li>• The zoning map for the area now comprises of Phase 1 lands and Phase 2 lands both of which will be indicated by an SLO, lands identified as Strategic Residential Reserve which will be displayed on the development plan map as an objective to</li> </ul>
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		<p>read: <i>'To protect and safeguard strategic residential reserve lands for potential future residential growth beyond the lifetime of the plan'</i>.</p> <ul style="list-style-type: none"> <li>• The redesignation of lands to the west along the Kilteel road from Res-N to RU.</li> </ul> <p>See response to OPR submission at the beginning of this report for further details.</p> <p><b>CE Recommendation:</b></p> <p><b>Part A:</b> No change to Draft Plan.</p> <p><b>Part B:</b> See recommended changes outlined in the response to the OPR submission at the beginning of this report (SD-195-227) and Appendix 1.</p>
SD-C195-133 CAIRN Plc	<p>The submission indicates that Cairn support the identification of Newcastle in the Core Strategy as a “Self-Sustaining Growth Town” in the Settlement Hierarchy, which is based on the analysis contained in the Development Plan and the ability of Newcastle to absorb further growth over the period 2022-2028 in tandem with social and physical infrastructure.</p> <p>Furthermore, the submission welcomes the provision in the Draft Plan which encourages sustainable forms of development in settlements such as Newcastle (in accordance with NPO7 and NPO9) by focusing development of main streets and lands close to the town core, which is aligned with NPO 3c, and which result in the creation of vibrant areas while also supporting the surrounding rural hinterland. The submission also welcomes Policy CS9: and CS9 Objective 1, CS9 Objective 2 and CS9 Objective 3 for Newcastle which will underpin the sustainable development in accordance with its role and function as a Self-Sustaining Growth Town.</p>	<p><b>CE Response:</b></p> <p>As a result of the submission (SD-195-227) from the Office of the Planning Regulator (OPR) and the Planning Authority’s response to the same in relation to Newcastle, this response and recommendation will be dealt with in two parts as follows:</p> <p><b>Part A:</b></p> <p>The support with regard to provisions set out in the Draft Plan for Newcastle is noted and welcomed. In line with National and Regional policy, the rate of growth planned within this settlement is expected to facilitate opportunities for the delivery of required social and physical infrastructure to meet demand in line with the settlement characteristics. The overarching principle for the town is to improve the social and physical services to provide for the growing population.</p> <p><b>Part B:</b></p>

	<p>It is also submitted that the commentary in the Draft Plan in relation to the improvements to public transport including Bus Connects, and the electrification of the Kildare line which will bring a high-frequency Dart service as far as Hazelhatch station will also benefit Newcastle.</p>	<p>In line with recommendations of submission SD-195-227 Office of the Planning Regulator (OPR), an examination has been carried out of the residential capacity and requirements of the Newcastle Area on foot of a revised housing target over the Plan period. This has resulted in a reduced housing target of 17,817 to 15,576 for the County. Arising from this reduced housing target a sequential approach has been applied to the zoning and phasing of lands in Newcastle to ensure the delivery of necessary infrastructure in accordance with NPO 9 of the National Planning Framework (NPF).</p> <p>This has resulted in the following changes to the land use zoning map for Newcastle:</p> <ul style="list-style-type: none"> <li>• Phase 1 Lands: Phase 1 residential lands to be delivered in tandem with the delivery of key infrastructure specific to the subject lands: <ul style="list-style-type: none"> <li>– <u>Burgage North Block 1</u>: Development to be carried out in tandem with the delivery of 2 new street connections to main street and the provision of a new local park c. 0.3ha.</li> <li>– <u>Burgage North Block 2</u>: Development to be carried out in tandem with the delivery of lands to facilitate an extension to St. Finian’s Community Centre.</li> <li>– <u>Burgage South/Taobh Chnoic Block 3</u>: A sequentially phased programme to be submitted alongside any planning application on the subject lands which provides for the delivery of the following in tandem with development or as described 1) No more than 200 units to be permitted before the commencement of the remaining lands of c. 1.4ha to provide for the full Taobh Chnoic Park to the south 2) Urban Park/Square c. 1ha in size (Burgage South Park), 3) East-West Link Street, 4) Sean Feirm Park c. 0.2ha in size, 5) a portion of Tower House Park c. 0.1ha. All applications shall demonstrate to the satisfaction of the Planning Authority how they are</li> </ul> </li> </ul>
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		<p>supporting the delivery of North South Street connections to the Main Street.</p> <ul style="list-style-type: none"> <li>- With regards delivery of a new primary school at Taobh Chnoic, the timing of this will be subject to educational needs in consultation with the Department of Education. Prior to completion of 200 units confirmation to be provided from the Department of Education on the transfer of lands to provide for the school, subject to their confirmation of need.</li> </ul> <ul style="list-style-type: none"> <li>• Phase 2 Lands: To only facilitate the delivery of Phase 2 residential lands once identified infrastructure comprising of the Urban Park/Square c. 1ha in size, the additional 1.4ha for Taobh Chnoic Park and the East/West Link Street required within Phase 1 have been delivered to the satisfaction of the Planning Authority.</li> <li>• The zoning map for the area now comprises of Phase 1 lands and Phase 2 lands both of which will be indicated by an SLO, lands identified as Strategic Residential Reserve which will be displayed on the development plan map as an objective to read: <i>'To protect and safeguard strategic residential reserve lands for potential future residential growth beyond the lifetime of the plan'</i>.</li> <li>• The redesignation of lands to the west along the Kilteel road from Res-N to RU.</li> </ul> <p><b>CE Recommendation:</b></p> <p><b>Part A:</b> No change to Draft Plan.</p> <p><b>Part B:</b> See recommended changes outlined in the response to submission (SD-195-227) from the Office of the Planning Regulator (OPR) and Appendix 1.</p>
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Residential Zoning Submission - Rathcoole		
Submission No.	Submission Summary	CE response and recommendation
SD-C195-87 Gareth Stanley	<p>The submission relates to a subject site of 10.3 ha east of Stoney Hill Road, Rathcoole.</p> <p>The submission outlines two requests which are contingent on each other:</p> <p>Item 1: Requests the rezoning of the subject site from Objective 'RU' - To protect and improve rural amenity and to provide for the development of agriculture to Objective 'RES-N' - To provide for new residential communities in accordance with approved area plans. It is requested that the subject site be rezoned in replace of the South Dublin County Council owned lands located at Rathcoole Woodlands.</p> <p>Item 2: Site Specific Local Objective (SLO) for a new pipeline from zoned lands east of Stoney Hill Road to Mill Road, Saggart to service the zoned lands for development.</p> <p><u>Item 1: Requests for Rezoning</u></p> <p>The submission highlights zoned RES-N lands to the east of Stoney Hill Road (7.7 hectares) are in their ownership and requests that the subject site adjacent to this and further south be zoned RES-N from RU. It is considered that these lands should be re-zoned RES-N in place of the RES-N zoned SDCC owned lands and would be suitable for housing, social and affordable housing, community infrastructure, etc. in line with Special Local Objective CS10 SL01.</p> <p>The submission highlights that the current zoned lands in their ownership (7.7ha site) already zoned RES-N was subject to an approved Strategic Housing Development</p>	<p><b>CE Response:</b></p> <p>As a result of the submission (SD-195-227) from the Office of the Planning Regulator (OPR) and the Planning Authority's response to the same in relation to Rathcoole, this response and recommendation will be dealt with in two parts as follows:</p> <p><b>Part A:</b></p> <p>The Core Strategy and Settlement Strategy in Chapter 2 sets out population and housing figures which must be consistent with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) as required under the Planning and Development Act 2000 (As Amended). South Dublin County is anticipated to grow by 46,518 persons with the housing target for the County, as set by Ministerial Guidelines and the NPF Road Map, being 17,817 homes up to 2028. Chapter 2 also confirms that the County has enough land for a further 10,470 units (79%) above the net household need and therefore there is no need to re-zone additional lands or zone new additional lands over and above those currently set out under the current 2016 County Development Plan. Having regard to above figures set out in the Core Strategy and the current excess of zoned land, without the need for further zoning, it is considered that there is sufficient flexibility to meet the household requirements for 2031 and potentially up to 2040. The revised target figures in response to the OPR recommendations, set out separately under the response to the OPR, do not impact on the excess land capacity available to meet the revised targets.</p> <p>With respect to the lands in ownership of South Dublin County Council, it is noted that on foot of the inclusion of CS10 SLO1 in the Draft Plan the Council has commissioned a study for these lands the outcome of which is the Framework Concept and Zoning Proposals document which is contained in Appendix 2A of this CE</p>

	<p>(SHD) application (Ref. ABP-307698-20) and as such the principle of residential use on this site is clearly established. However, it is highlighted that these specific lands and the Council owned lands make up the majority of its residential land availability and which will be relied upon to achieve the housing targets for Rathcoole. The submission details the issues associated with these two sites in releasing development to include:</p> <ul style="list-style-type: none"> <li>• Ecological issues affecting the South Dublin County Council land - presence of habitats of significant ecological value (to national and European level).</li> <li>• Issues with the Wastewater Upgrade Works at Tay Lane Foul Pumping Station.</li> </ul> <p>With regard to these issues, the submission considers that subject site (10.3 ha) in their ownership to the south of site for the approved SHD scheme (Ref. ABP-307698- 20) are inherently more suitable for residential development.</p> <p>The submission details a number of reasons justifying the rezoning of the subject site to include:</p> <ul style="list-style-type: none"> <li>• Serviceable in terms of wastewater by way of a proposed foul water sewer pipeline link to Mill Road, Saggart;</li> <li>• Contribute to the delivery of a significant greenway between Rathcoole and Saggart, via Rathcoole Park;</li> <li>• Meet demand for housing in Rathcoole and contribute to social and affordable housing;</li> <li>• Catalyst for the delivery of the Western Dublin Orbital Route;</li> <li>• Considered a Teir 2 site depending on capacity upgrades and connection; and</li> <li>• North-western corner of the subject lands is served by footpaths, public lighting, and an existing watermain.</li> </ul>	<p>Report. The zoning proposals have provided for the rezoning of the majority of the woodland area from RES-N to RU and the rationale and recommendation for this is contained within the response to issues raised in the OPR submission, treated separately in the beginning of this Part of the CE Report and in the Core Strategy Chapter 2 section of this report .The Framework Concept and Zoning Proposals document forms an appendix to the CE Report and addresses the issues raised in the submissions relating to the future development of this area and potential impact on the biodiversity and amenity of the area.</p> <p>With respect to collaboration with Irish Water, Infrastructure at Tay Lane, and Item 2: Request for an SLO to provide such infrastructure it is noted the Draft Plan provides for adequate provisions in this regard. In particular the following provisions are of note:</p> <p>IE2 Objective 1: <i>To work in conjunction with Irish Water to protect existing water and drainage infrastructure and to promote the ongoing upgrade and expansion of water supply and wastewater services to meet the future needs of the County and the Region.</i></p> <p>IE2 Objective 8: <i>To ensure on-going liaison and consultation with Irish Water to ensure that the water services infrastructure for the planned growth of the County, in line with the County's Core Strategy, is integrated into the relevant plans and capital programmes and to ensure that the design and layout of water services is fully considered to deliver sustainable growth.</i></p> <p>Furthermore, and in line with recommendations of submission SD-195-227 Office of the Planning Regulator (OPR), an examination has been carried out of the residential capacity and requirements of the Rathcoole Area on foot of a revised housing target over the Plan period. In particular, recommendations have been made in response to the OPR submission (SD-195-227) that specifically</p>
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	<p>The submission points out that the draft plan does not include any objective for pro-active engagement with Irish Water to advance the critical upgrade of the Tay Lane pumping station and should be a priority objective within the Plan.</p> <p><u>Item 2: Site Specific Local Objective (SLO)</u></p> <p>It is submitted that to develop the subject site and adjacent lands in the short term, would be to connect to the existing foul water sewer at Mill Road, Saggart and this connection will unlock the lands to the east of Stoney Hill Road, Rathcoole for major residential development.</p> <p>A potential/indicative connection route of the proposed new foul water sewer pipeline between Stoney Hill Road, Rathcoole and Mill Road, Saggart is suggested and considers that this indicative route satisfies and would contribute to draft Specific Local Objective GI7 SLO 1. The submission notes that this route is a wayleave and therefore has the potential to act as a high-quality greenway link between Stoney Hill Road in Rathcoole and Saggart, via Rathcoole Park.</p> <p>The submission contends that the Plan should include a Specific Local Objective (SLO) for its delivery. The submission suggests this SLO should read as follows:  <i>“Facilitate the provision of a new pipeline from zoned lands east of Stoney Hill Road to Mill Road, Saggart to service the zoned lands for development”</i></p>	<p>relate phasing of development in tandem with required infrastructure.</p> <p><b>Part B:</b></p> <p>In line with recommendations of submission SD-195-227 Office of the Planning Regulator (OPR), an examination has been carried out of the residential capacity and requirements of the Rathcoole Area on foot of a revised housing target over the Plan period. This has resulted in a reduced housing target of 17,817 to 15,576 for the County. Arising from this reduced housing target a sequential approach has been applied to the zoning and phasing of lands in Rathcoole to ensure the delivery of necessary infrastructure in accordance with NPO 9 of the National Planning Framework (NPF).</p> <p>This has resulted in the following changes to the land use zoning map for Rathcoole:</p> <ul style="list-style-type: none"> <li>– Phase 1 Lands A: Phase 1 (adjacent to Rathcoole Park) residential lands to be delivered in tandem with the delivery of a new access road, new primary school, a library hub on the RES-N zoned lands and three sports pitches and sports pavilion on the adjoining Open Space zoned lands.</li> <li>– Phase 1 Lands B: Phase 1 lands subject to the necessary road upgrades to the west of the site being delivered in tandem with development. Development shall also provide for an appropriately landscaped riparian corridor along the eastern boundary of the subject lands and associated landscaping throughout the site. The development of these lands shall also be subject to a specific local objective in regard to the reservation of land to facilitate the western orbital route.</li> <li>– The zoning map for the area now comprises of Phase 1 lands which will be indicated by a specific local objective on the lands (SLO). SM5 SLO 2 to read: <i>To ensure that development</i></li> </ul>
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		<p><i>of Phase 1 lands at Tootenhill (Rathcoole) accommodates the required road reservation for a Western Orbital Route.</i></p> <ul style="list-style-type: none"> <li>– Further lands have been identified as Strategic Residential Reserve and will be displayed as an objective ‘<i>To protect and safeguard strategic residential reserve lands for potential future residential growth beyond the lifetime of the plan</i>’ on map 7 identified by hatched markings overlaid onto the underlying zoning objective.</li> <li>– Lands measuring c. 0.6ha to the southwest of the town to be rezoned from Res-N to RU (rural).</li> </ul> <p><b>CE Recommendation:</b></p> <p><b>Part A:</b> No change to Draft Plan.</p> <p><b>Part B:</b> See recommended changes outlined in the response to the OPR submission at the beginning of this report (SD-195-227) and Appendix 1.</p>
<p>SD-C195-262 Declan Claffey</p> <p>SD-C195-267 Declan Claffey</p>	<p>The submission relates to subject lands of 4.8 ha located at Stoney Hill Road, Rathcoole and requests that part (3 ha) of the subject lands be zoned Objective RES-N.</p> <p>The submission outlines a number of reasons justifying the request to rezone the subject lands to include the following:</p> <ul style="list-style-type: none"> <li>• Existing agricultural use is no longer viable and will create a pocket of agricultural land surrounded by incompatible uses and no tangible benefit for the people of Rathcoole;</li> <li>• Strategically located in terms of Dublin City, access to the N7 and close proximity of Rathcoole Village;</li> <li>• Within walking distance to all facilities and amenities in Rathcoole;</li> </ul>	<p><b>CE Response:</b></p> <p>The submission relates to subject lands of 4.8 ha located at Stoney Hill Road, Rathcoole and requests that part (3 ha) of the subject lands be zoned Objective RES-N.</p> <p>As a result of the submission (SD-195-227) from the Office of the Planning Regulator (OPR) and the Planning Authority’s response to the same in relation to Rathcoole, this response and recommendation will be dealt with in two parts as follows:</p> <p><b>Part A:</b></p> <p>The Core Strategy and Settlement Strategy in Chapter 2 sets out population and housing figures which must be consistent with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) as required under the Planning and</p>

	<ul style="list-style-type: none"> <li>• Bound by existing residential developments, playing pitches and amenity zoned land;</li> <li>• All services including foul sewerage, water and utilities are available in close proximity;</li> <li>• Access to the subject land is readily available from the existing housing scheme or by agreement with the landowners on the east and west sides;</li> <li>• Subject lands are not encumbered by environmental considerations;</li> <li>• Considered to be a sequentially appropriate site for an extension to the built-up area; and</li> <li>• Rezoning would be in accordance with National and Regional Planning policies would deliver much needed, high quality and sustainable housing.</li> </ul> <p>The submission notes that subject land is identified and referred to in the proposed Rathcoole / Saggart Distributor Road and the proposed road is identified in the Draft Plan. The Rathcoole / Saggart Distributor plans make the following reference to the subject land “Possible Future Access to Zoned Land”. It is submitted that it is clear from this statement that that South Dublin County Council has identified the subject land for future housing which in the long term will benefit from enhanced future access with the proposed new distributor road.</p> <p>The submission notes that the location of the proposed Rathcoole / Saggart Distributor Road as shown in the draft plan appears to run through their home and requests that the original plans published for the Rathcoole / Saggart Distributor Road remain unchanged and for the zoning of the subject lands be amended to RES-N to allow for housing development to occur north of the distributor road at the subject lands.</p>	<p>Development Act 2000 (As Amended). South Dublin County is anticipated to grow by 46,518 persons with the housing target for the County, as set by Ministerial Guidelines and the NPF Road Map, being 17,817 homes up to 2028. Chapter 2 also confirms that the County has enough land for a further 10,470 units (79%) above the net household need and therefore there is no need to re-zone additional lands or zone new additional lands over and above those currently set out under the current 2016 County Development Plan. Having regard to above figures set out in the Core Strategy and the current excess of zoned land, without the need for further zoning, it is considered that there is sufficient flexibility to meet the household requirements for 2031 and potentially up to 2040. The revised target figures in response to the OPR recommendations, set out separately under the response to the OPR, do not impact on the excess land capacity available to meet the revised targets.</p> <p>With regard to the Rathcoole/Saggart Distributor Road, it is considered premature to determine if the subject lands will be identified for development in the future. Table 7.5 identifies the Western Dublin Orbital Route within the 6 year programme but indicates that the need for this route will be determined through the review of the NTAs GDA Strategy and in consultation with TII and relevant local authorities. The NTAs submission to the Draft Plan relates and is dealt with separately at the beginning of this report. Having regard to the awaited outcome of the need for an orbital route, SM6 SLO 1 of the Draft Plan specifically seeks to ‘investigate the need to carry out a traffic and transport study for Rathcoole, Saggart and Newcastle and the surrounding areas following the publication of the GDA Strategy review to 2042 which will clarify the context within which the road network in the area will function and to include a review of HGV movement’. To base any new zoning on road proposals is misplaced.</p> <p><b>Part B:</b></p> <p>In line with recommendations of submission SD-195-227 Office of the Planning Regulator (OPR), an examination has been carried</p>
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		<p>out of the residential capacity and requirements of the Rathcoole Area on foot of a revised housing target over the Plan period. This has resulted in a reduced housing target of 17,817 to 15,576 for the County. Arising from this reduced housing target a sequential approach has been applied to the zoning and phasing of lands in Rathcoole to ensure the delivery of necessary infrastructure in accordance with NPO 9 of the National Planning Framework (NPF).</p> <p>This has resulted in the following changes to the land use zoning map for Rathcoole:</p> <ul style="list-style-type: none"> <li>– Phase 1 Lands A: Phase 1 (adjacent to Rathcoole Park) residential lands to be delivered in tandem with the delivery of a new access road, new primary school, a library hub on the RES-N zoned lands and three sports pitches and sports pavilion on the adjoining Open Space zoned lands.</li> <li>– Phase 1 Lands B: Phase 1 lands subject to the necessary road upgrades to the west of the site being delivered in tandem with development. Development shall also provide for an appropriately landscaped riparian corridor along the eastern boundary of the subject lands and associated landscaping throughout the site. The development of these lands shall also be subject to a specific local objective in regard to the reservation of land to facilitate the western orbital route.</li> <li>– The zoning map for the area now comprises of Phase 1 lands which will be indicated by a specific local objective on the lands (SLO). SM5 SLO 2 to read: <i>To ensure that development of Phase 1 lands at Tootenhill (Rathcoole) accommodates the required road reservation for a Western Orbital Route.</i></li> <li>– Further lands have been identified as Strategic Residential Reserve and will be displayed as an objective ‘<i>To protect and safeguard strategic residential reserve lands for potential future residential growth beyond the lifetime of the plan</i>’ on</li> </ul>
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		<p>map 7 identified by hatched markings overlaid onto the underlying zoning objective.</p> <ul style="list-style-type: none"> <li>– Lands measuring c. 0.6ha to the southwest of the town to be rezoned from Res-N to RU (rural).</li> </ul> <p><b>CE Recommendation:</b></p> <p><b>Part A:</b> No change to Draft Plan.</p> <p><b>Part B:</b> See recommended changes outlined in the response to the OPR submission at the beginning of this report (SD-195-227) and Appendix 1.</p>
<p>SD-C195-247 Armstrong Fenton Ltd</p>	<p>The submission relates to the lands of c. 20 acres in total located at Green Lane, Rathcoole.</p> <p>The submission outlines 3 requests which are all contingent on each other:</p> <p>Item 1: Requests the rezoning of the subject site from Objective 'RU' - To protect and improve rural amenity and to provide for the development of agriculture to Objective 'RES-N' - To provide for new residential communities in accordance with approved area plans.</p> <p>Item 2: Construction of a new road as a replacement to Whitehouse Lane from the N7 junction to a proposed roundabout at Johnstown Road. The above will facilitate the future construction of the proposed Western Dublin Orbital Route (WDOR)</p> <p>Item 3: Rezoning of a portion of land for Western Dublin Orbital Route.</p> <p><u>Item 1: Rezoning of Land</u></p>	<p><b>CE Response:</b></p> <p>The submission relates to the lands of c. 20 acres in total located at Green Lane, Rathcoole and requests that the subject lands be zoned Objective RES-N, offer the construction of a new road and the rezoning of a small portion of land to RU to facilitate the Western Dublin Orbital Route (WDOR).</p> <p>As a result of the submission (SD-195-227) from the Office of the Planning Regulator (OPR) and the Planning Authority's response to the same in relation to Rathcoole, this response and recommendation will be dealt with in two parts as follows:</p> <p><b>Part A:</b></p> <p><u>Item 1: Rezoning of Land</u></p> <p>The Core Strategy and Settlement Strategy in Chapter 2 set out population and housing figures which must be consistent with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) as required under the Planning and Development Act 2000 (As Amended). South Dublin County is anticipated to grow by 46,518 persons with the housing target for</p>

	<p>The submission requests the rezoning of the subject site to compensate for the constraints prevailing to lands currently zoned "RES-N" at Tootenhill, Rathcoole in tandem with the loss of capacity arising from the rezoning of "RES-N" zoned lands to "RU" zoned lands.</p> <p>The submission points out the subject lands are traversed by a proposed road objective, the Western Dublin Orbital Route (WDOR).</p> <p>The submission details the grounds for the rezoning request which include the following:</p> <ul style="list-style-type: none"> <li>• Constraints in the carrying out of residential capacity on lands at Tootenhill, Rathcoole;</li> <li>• Loss of "RES-N" zoned lands to "RU" zoned lands at Tootenhill, Rathcoole thus reducing the residential capacity;</li> <li>• Slow uptake in developing zoned lands in the area through one or more development plan cycle;</li> <li>• Extend the natural boundary with the adjoining existing residential development to the north;</li> <li>• Subject site within walking distance of the all the services available in Rathcoole, such as shops, schools, amenities etc;</li> <li>• Potential for additional population growth in line with more recent information from Central Statistics Office (CSO) should be considered;</li> <li>• Considered that CS10 SLO 1 may hinder the making of planning applications for housing, thus possibly making the current zoning irrelevant;</li> <li>• Result in Green Lane being widened along the length of road frontage as far as the propose WDOR to the benefit of all road users and alleviate traffic; and</li> <li>• Request for rezoning in tandem with de-zoning and adjustments to existing residentially zoned land with</li> </ul>	<p>the County, as set by Ministerial Guidelines and the NPF Road Map, being 17,817 homes up to 2028. Chapter 2 also confirms that the County has enough land for a further 10,470 units (79%) above the net household need and therefore there is no need to re-zone additional lands or zone new additional lands over and above those currently set out under the current 2016 County Development Plan. Having regard to above figures set out in the Core Strategy and the current excess of zoned land, without the need for further zoning, it is considered that there is sufficient flexibility to meet the household requirements for 2031 and potentially up to 2040. The revised target figures in response to the OPR recommendations, set out separately under the response to the OPR, do not impact on the excess land capacity available to meet the revised targets. Therefore, to re-zone or zone new additional lands over and above those currently set out in the Draft Plan would be contrary to National and Regional planning policy.</p> <p>With regard to the reference for a needs assessment, it should be noted that the Draft Plan includes a Housing Strategy and Interim HNSA contained within Appendix 11 of the Development Plan which carries out an evidence-based assessment for the County up to 2028. H1 Objective 12 of the Draft Plan seeks to examine the need to vary the Development Plan, following the publication of the guidance on HNSA methodology issued by the Department of Housing, Local Government and Heritage in April 2021. Therefore, a further review of household composition will be examined and updated if deemed necessary. Furthermore, its noted that Eastern and Midland Regional Assembly (EMRA) have substantiated the Housing Strategy and Interim HNSA and have stated in their submission "the 'Housing Strategy and Interim HNSA' provide a robust evidence-based framework to inform the housing policies in the Draft CDP including requirements for specialist provision and social and affordable housing, subject to the publication of any future revised 'Housing Strategy' Guidelines under Section 28 that may require further housing need and demand assessment to be taken into account". Therefore, it is considered that the Interim</p>
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	<p>essential road works to facilitate access in and out of Rathcoole.</p> <p>The submission highlights concern that if the figures set out in the NPF and RSES, are used to project population growth and resulting housing need for the period 2022-2028, there is a serious risk the projections will fall far short of the actual population figures and ultimately lead to a shortage of appropriately zoned land to cater for the demand. It is considered essential that potential housing need for South Dublin is correctly estimated using the most up to date and accurate information available to ensure a robust, and rigorous housing need assessment.</p> <p>The submission draws the Council's attention to paragraph 4.4.2 Land/Site Proposed to be Zoned of the Development Plans Guidelines for Planning Authorities Draft for Consultation (DofHLG&amp;H) August 2021, which requires planning authorities to consider the rate of take-up and built-out of zoned land over the preceding period of 6-10 years, when considering proposals for re-zoning. The submission refers to Sections 4.43 of the draft Guidelines and points out that there has been little housing activity in Rathcoole. The submission notes that 51% of sites within South Dublin with planning permission for residential development were not commenced over the period between 2016 and 2020. And it considered that should this trend continue projected housing targets will not be achieved.</p> <p><i>Item 2: Construction of a New Road.</i></p> <p>The submission seeks the construction of a new road as a replacement to Whitehouse Lane from the N7 junction to a proposed roundabout at Johnstown Road. The above will facilitate the future construction of the proposed Western Dublin Orbital Route (WDOR). The submission notes that overall, it is proposed to build the proposed new road, to</p>	<p>HDNA carries out an evidence-based assessment for the County and there is adequate provision in plan to update if required.</p> <p>With regard to building out of sites and consideration of zoning proposals, it is noted that the Land Capacity Audit, which informs the Core Strategy, comprised a comprehensive review and analysis to calculate the potential yield of undeveloped land (RES, RES-N, TC, REGEN, VC, DC, LC and SDZ) zoned in the 2016 - 2022 County Development Plan. In addition, and as noted above, it is recognised that South Dublin County has a physical excess of zoned lands to meet the population and housing targets set out under national and regional policy. These lands are located, for the most part, within existing built-up areas in Dublin City and Suburbs and will, therefore, support compact growth. In supporting the compact growth agenda, the Development Plan has placed a significant emphasis on deliverability, monitoring, growth, and active land management. In this regard, the Draft Plan acknowledges the need for the delivery of a compact growth agenda and includes a range of measures which promote development.</p> <p>The Planning Authority has examined the challenges with regard to the build out of sites as referred to in the submission in detail and is satisfied that the majority of lands to which this applies relate to Adamstown and Clonburris SDZs which are strategic long-term lands identified in the RSES and to other LAP areas, including Fortunestown, and for which development is now progressing. Furthermore, it should be noted the Office of Planning Regulator (OPR) has made specific recommendations with regard to Rathcoole which is discussed below in Part B. Therefore, it considered that development will occur in a sustainable manner over the lifetime of the Plan.</p> <p><i>Item 2: Construction of a New Road</i></p> <p>With regard to the construction of a new road as a replacement to Whitehouse Lane from the N7 junction to a proposed roundabout at</p>
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	<p>have an appropriate zoning on the rural side of the WDOR and lands for the reservation of the (WDOR) to be rezoning from Residential to Agriculture subject to rezoning of their lands at Green Lane, Rathcoole.</p> <p>The submission notes that in order to the achieve the rezoning of subject lands and a new road, the landowners are willing to construct part of the proposed WDOR at Tootenhill, Rathcoole as a local road.</p> <p>The submission highlights that TM4 SLO of the 2016-2022 Development Plan requires "RES-N" lands at Tootenhill to accommodate the required reservation for the proposed WDOR and emphasises that this SLO is not in the Draft Plan. The submission notes how the proposed WDOR is now a 6-year road proposal from a longterm and does not require developers to construct the proposed WDOR.</p> <p>It is submitted that such a road will facilitate other road users and not just local traffic and will be in receipt of national funding, which is not available at this time. Therefore, it is notes that the landowners are willing to cover the cost of the above section of the road subject to a waiver of financial contributions, conditioned in future grants of planning permission.</p> <p><u>Item 3: Rezoning of Land for Western Dublin Orbital Route</u></p> <p>The submission seeks the rezoning of lands at Rathcoole from RES-N to RU. The submission notes that landowners are willing to have two Plots "X" and "W" indicated on Fig. 10 (a map included with the submission) to be rezoned from "RES-N" to "RU" zoned lands. It is indicated that these subject lands are on the rural side of the proposed Western Dublin Orbital Route WDOR and lands for the reservation of the (WDOR), which would appear to be the most appropriate land use zoning. It is contended that the configuration and</p>	<p>Johnstown Road to facilitate the future construction of the proposed Western Dublin Orbital Route (WDOR), it considered premature at this time to allow for provision of the same.</p> <p>Table 7.5 identifies the Western Dublin Orbital Route within the 6 year programme but indicates that the need for this route will be determined through the review of the NTAs GDA Strategy and in consultation with TII and relevant local authorities. The NTAs submission to the Draft Plan relates and is dealt with separately at the beginning of this report. Having regard to the awaited outcome of the need for an orbital route, SM6 SLO 1 of the Draft Plan specifically seeks to '<i>investigate the need to carry out a traffic and transport study for Rathcoole, Saggart and Newcastle and the surrounding areas following the publication of the GDA Strategy review to 2042 which will clarify the context within which the road network in the area will function and to include a review of HGV movement</i>'. To base any new zoning on road proposals is misplaced.</p> <p>In line with recommendations of submission SD-195-227 Office of the Planning Regulator (OPR), an examination has been carried out of the residential capacity and requirements of the Rathcoole Area on foot of a revised housing target over the Plan period.</p> <p><u>Item 3: Rezoning of Land for Western Dublin Orbital Route</u></p> <p>In line with recommendations of submission SD-195-227 Office of the Planning Regulator (OPR), an examination has been carried out of the residential capacity and requirements of the Rathcoole Area on foot of a revised housing target over the Plan period. In particular, recommendations have been made that specifically related to land marked "X" and "Y" as outlined the submission.</p> <p>These are summarized below and set out in the response and recommendations to the OPR separately at the beginning of this report.</p>
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	<p>area of the small plots do not lend themselves suitable for the layout of residential units thus their zoning potential cannot as such be fully achieved and accordingly, their capacity should be removed from the Development Plan as it distorts the true position. The submission highlights that this rezoning proposal is subject to landowners achieving the sought for rezoning for lands at Green Lane, Rathcoole.</p>	<p><b>Part B:</b></p> <p>In line with recommendations of submission SD-195-227 Office of the Planning Regulator (OPR), an examination has been carried out of the residential capacity and requirements of the Rathcoole Area on foot of a revised housing target over the Plan period. This has resulted in a reduced housing target of 17,817 to 15,576 for the County. Arising from this reduced housing target a sequential approach has been applied to the zoning and phasing of lands in Rathcoole to ensure the delivery of necessary infrastructure in accordance with NPO 9 of the National Planning Framework (NPF).</p> <p>This has resulted in the following changes to the land use zoning map for Rathcoole:</p> <ul style="list-style-type: none"> <li>- Phase 1 Lands A: Phase 1 (adjacent to Rathcoole Park) residential lands to be delivered in tandem with the delivery of a new access road, new primary school, a library hub on the RES-N zoned lands and three sports pitches and sports pavilion on the adjoining Open Space zoned lands.</li> <li>- Phase 1 Lands B: Phase 1 lands subject to the necessary road upgrades to the west of the site being delivered in tandem with development. Development shall also provide for an appropriately landscaped riparian corridor along the eastern boundary of the subject lands and associated landscaping throughout the site. The development of these lands shall also be subject to a specific local objective in regard to the reservation of land to facilitate the western orbital route.</li> <li>- The zoning map for the area now comprises of Phase 1 lands which will be indicated by a specific local objective on the lands (SLO). SM5 SLO 2 to read: <i>To ensure that development of Phase 1 lands at Tootenhill (Rathcoole) accommodates the required road reservation for a Western Orbital Route.</i></li> </ul>
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		<ul style="list-style-type: none"> <li>- Further lands have been identified as Strategic Residential Reserve and will be displayed as an objective '<i>To protect and safeguard strategic residential reserve lands for potential future residential growth beyond the lifetime of the plan</i>' on map 7 identified by hatched markings overlaid onto the underlying zoning objective.</li> <li>- Lands measuring c. 0.6ha to the southwest of the town to be rezoned from Res-N to RU (rural).</li> </ul> <p><b>CE Recommendation:</b></p> <p><b>Part A:</b> Item 1: No change to Draft Plan, Item 2: As per Part B and item 3: As per Part B.</p> <p><b>Part B:</b> See recommended changes outlined in the response to the OPR submission at the beginning of this report (SD-195-227) and Appendix 1.</p>
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<b>Residential Zoning Submission - Adamstown Area</b>		
<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation</b>
<p><a href="#">SD-C195-201 John Spain Associates</a></p> <p><a href="#">SD-C195-203 John Spain Associates</a></p>	<p>The submission relates to subject lands at Aderrig comprising of 45 Ha, to the west of Adamstown SDZ (Strategic Development Zone).</p> <p>The submission requests that the subject lands be identified for strategic long-term development as per the definition provided by "Draft Development Plan Guidelines, 2021". It is noted that the subject lands are currently zoned 'Objective 'RU – '<i>To protect and improve rural amenity and to provide for the development of agriculture</i>'.</p> <p>The submission sets out a number of points justifying their request for a strategic long-term designation:</p>	<p><b>CE Response:</b></p> <p>The lands subject to the submissions relate to c 45ha and are zoned RU Rural, in the Draft Plan and lie to the west of Adamstown SDZ. The response is addressed under the following headings:</p> <ul style="list-style-type: none"> <li>• Core Strategy</li> <li>• Land Capacity</li> <li>• Additional Provision</li> <li>• Housing Need Demand Assessment (HDNA)</li> <li>• Border Location of Subject Lands</li> </ul>

	<ul style="list-style-type: none"> <li>• Contribute to the future housing to be delivered in the County in accordance with the RSES and the MASP and deliver significant residential development over a timescale greater than a single six-year development plan period;</li> <li>• Form a natural and logical extension of the Adamstown SDZ area;</li> <li>• Could contribute towards the Green infrastructure of South Dublin - submission is accompanied by a landscape Rationale prepared by Ronan Mac Diarmada and Associates;</li> <li>• Considers the lands to be serviceable - submission is accompanied by an infrastructural Services and Capacity Report;</li> <li>• Subject lands are strategically located along the Kildare rail line and DART+ and close to Grange Castle Business Park; and</li> <li>• Request for a Long-Term Strategic and Sustainable Development Site designation of the Aderrig lands is a similar approach proposed by DLRCC in their Draft Plan 2022- 2028 in respect to lands at Old Connaught.</li> </ul> <p>The submission highlights that the Land Capacity Study of existing undeveloped zoned land and the estimated potential for 23,730 units on 477 hectares. It is submitted that this approach will further exacerbate housing shortage issues and should be reviewed and it is considered that the Planning Authority fails to take into account their own findings in relation to challenges other facing housing delivery. The submission also argues the validity of the Infrastructure Assessment and notes that CS3 Objective 5 and questions the reliability of the infrastructural assessment and land capacity studies given that the information set out under CS3 Objective 5 is clearly not known.</p>	<p><b>Core Strategy</b></p> <p>The Core Strategy and Settlement Strategy in Chapter 2 sets out population and housing figures which and confirms that the County has enough land for a further 10,470 units (79%) above the net household need and therefore there is no need to re-zone additional lands or zone new additional lands over and above those currently set out under the current 2016 County Development Plan.</p> <p>Having regard to above figures set out in the Core Strategy and the current excess of zoned land, without the need for further zoning, it is considered that there is sufficient flexibility to meet the household requirements for 2031 and potentially up to 2040. The revised target figures in response to the OPR recommendations, set out separately under the response to the OPR, do not impact on the excess land capacity available to meet the revised targets.</p> <p>Therefore, to re-zone or zone new additional lands over and above those currently set out in the Draft Plan would be contrary to National and Regional planning policy</p> <p>In this context, the designation of the subject lands would undermine the delivery of households within strategic residential growth sites identified within the Regional Metropolitan Area Strategic Plan at: Adamstown, Clonburris, Tallaght, Naas Road and Fortunestown which would be contrary to National and Regional Planning Policy. Therefore, to re-zone or zone new additional lands over and above those currently set out in the Draft Plan would be contrary to National and Regional planning policy</p> <p><b>Land Capacity</b></p> <p>The Land Capacity Audit, which informs the Core Strategy, comprised a comprehensive review and analysis to calculate the potential yield of undeveloped land (RES, RES-N, TC, REGEN, VC, DC, LC and SDZ) zoned in the 2016 - 2022 County Development Plan. Within this total capacity, approximately 150 ha of Long-Term Strategic lands providing for more than 7,500 units</p>
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	<p>The submission refers to the "Draft Development Plan Guidelines, 2021" and the 'Additional Provision' and submits that the subject lands can be considered as further additional provision over and above the 20-25% threshold of the lands included under "Additional Provision" and that the subject lands fulfil the identified criteria and should be designated for long term strategic and sustainable development.</p> <p>The submission refers Housing Need Demand Assessment (HNDA) guidance published in April 2021. However, it is submitted that Appendix 11, South Dublin Housing Strategy and Interim HNDA 2022 - 2028, be reviewed as it does not have regard to the Housing Needs and Demand Assessment (HNDA) Guidelines which were published on the 14th April 2021 and the housing targets within the report and succeeding Core Strategy and Settlement Strategy relate to ESRI 50:50 Scenario published by the Department in December 2020 which have been superseded by the new guidance.</p> <p>The submission considers that the capacity stated as being available within the Adamstown SDZ as set out in Table 8 of the Draft Development Plan appears to be overstated. Table 8 states that there is 80 hectares available however the 2020 Amendment to Adamstown SDZ stated that the undeveloped area at that time comprised only 60 hectares.</p>	<p>have been identified as being deliverable over the Development Plan period and are included in the land capacity figures. In addition, and as noted above, it is recognised that South Dublin County has a physical excess of zoned lands to meet the population and housing targets set out under national and regional policy. These lands are located, for the most part, within existing built-up areas in Dublin City and Suburbs and will, therefore, support compact growth.</p> <p>In supporting the compact growth agenda, the Development Plan has placed a significant emphasis on deliverability, monitoring, growth, and active land management. In this regard, the Draft Plan acknowledges the need for the delivery of a compact growth agenda and includes a range of measures which promote development.</p> <p>In addition, with regard to delivery of housing, the Planning Authority has examined the challenges referred to in the submission in detail and is satisfied that the majority of lands to which this applies relate to Adamstown and Clonburris SDZs which are strategic long-term lands identified in the RSES and to other LAP areas, including Fortunestown, and for which development is now progressing. Furthermore, it should be noted that other submissions made to this Draft Plan have noted they can deliver housing in such locations and potential exceed targets. Therefore, it considered that such development will occur in a sustainable manner over the lifetime of the Plan.</p> <p>The submission refers to the validity of the Infrastructure Assessment and Objective CS3 5. It is noted that a thorough Infrastructure Assessment and Social Infrastructure Audit was carried out that built on the initial Land Capacity Analysis. This assessment gathered pertinent data on all identified lands in relation to their infrastructural constraints and requirements in order to differentiate between zoned land that is available for development and zoned land that requires significant further investment in services and infrastructure in order for development</p>
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		<p>to be realised. This identifies the zoned lands and assets in each settlement and opportunities to ensure further growth is provided for in tandem with social and physical infrastructure. Objective CS3 5 aims to build on this assessment.</p> <p><b>Additional Provision</b></p> <p>As outlined above, the Council will monitor the delivery of housing units to ensure general compliance with the Core Strategy and housing supply targets for the County and to inform any redistribution potential to facilitate delivery. The Core Strategy figures for each neighbourhood area serve as a benchmark for monitoring to ensure compliance with National and Regional figures. Noting that the Draft Plan has a surplus of zoned land to meet the housing targets set out in the Housing Supply Targets issued by the Department of Housing, Local Government and Heritage in January 2021, there is no basis for the Plan providing for 'Additional Provision'.</p> <p><b>Housing Need Demand Assessment (HDNA)</b></p> <p>The Draft Plan includes a Housing Strategy and Interim HNDA contained within Appendix 11 of the Development Plan which carries out an evidence-based assessment for the County up to 2028. H1 Objective 12 of the Draft Plan seeks to examine the need to vary the Development Plan, following the publication of the guidance on HNDA methodology issued by the Department of Housing, Local Government and Heritage in April 2021. Therefore, a further review of household composition will be examined and updated if deemed necessary.</p> <p>Furthermore, its noted that Eastern and Midland Regional Assembly (EMRA) have substantiated the Housing Strategy and Interim HNDA and have stated in their submission "<i>the 'Housing Strategy and Interim HNDA' provide a robust evidence-based framework to inform the housing policies in the Draft CDP including requirements for specialist provision and social and affordable</i></p>
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		<p><i>housing, subject to the publication of any future revised 'Housing Strategy' Guidelines under Section 28 that may require further housing need and demand assessment to be taken into account'. Therefore, it is considered that the Interim HDNA carries out an evidence-based assessment for the County and there are adequate provision in plan to update if required.</i></p> <p><b>Adamstown Capacity Figures</b></p> <p>An analysis of all undeveloped land was carried out prior to the issuing of the Draft Plan in July in 2021 and at that time it was found that 80 ha of land was undeveloped.</p> <p><b>Border Location of Subject Lands</b></p> <p>The subject lands are adjacent to Adamstown SDZ which has seen and will continue to see considerable growth at the western extremity of South Dublin's lands, on the border with Kildare. The extent of this population and physical growth will take time for new and existing communities to bed in and further extensive growth would not be appropriate and would have to be considered in the light of future options for compact growth. In recognizing the increasing coalescence of settlement and economic development between KCC and SDCC there is an objective in the draft Plan, GI1 Obj 6 to collaborate with KCC to identify a common approach between the growing settlements in each county.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<p>SD-C195-207 Quintain Developments Ireland Limited</p>	<p>The submission relates to subject lands comprising of 24.2 Ha adjoining and immediately to the west of the Aderrig Development Area of the Adamstown Strategic Development Zone (SDZ).</p> <p>It is submitted that the subject lands should be zoned for residential use from RU and if this is not feasible within this</p>	<p><b>CE Response:</b></p> <p>The subject lands, 24.2 ha, are zoned RU Rural, in the Draft Plan and lie to the west of Adamstown SDZ. The Core Strategy and Settlement Strategy in Chapter 2 sets out population and housing figures which must be consistent with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy</p>

	<p>2022-2028 Draft Plan, it is submitted that the subject lands should be considered part of a strategic extension to the Adamstown SDZ in the next Development Plan.</p> <p>The submission sets out a number of reasons justifying their request to include the following:</p> <ul style="list-style-type: none"> <li>• Fully serviced with all necessary road connections, services, and utility connections available and are under the management of the landowner;</li> <li>• Considered 'Tier 1 Serviced Zoned Land';</li> <li>• Strategically located for public transport - located approximately 450m (5 minutes' walk) from Adamstown Station;</li> <li>• Subject lands are within a 0 to 5-minute walk to a Local Centre and within a 0 to 10-minute walk of the District Centre;</li> <li>• Represent a logical and sustainable expansion of the SDZ and consider it timely for an expansion of the SDZ to ensure an ongoing supply of housing at Adamstown into the future; and</li> <li>• Align with NPF and RSES with respect to compact growth, directly adjacent to a public transport hub and the amenities and employment opportunities.</li> </ul> <p>The submission also highlights that only the following significant social infrastructure which the landowners are responsible for remains to be delivered in Adamstown and provides a status on each to include: Health Centre; Civic Centre/Library; Central Boulevard Park; Enterprise Centre; Primary School # 4; and Tandy's Lane Village Centre.</p> <p>The submission is accompanied by an Engineering Assessment Report; Adamstown Brochure and a Report on Unit Mix Requirement.</p>	<p>(RSES) as required under the Planning and Development Act 2000 (As Amended) and also confirms that the County has enough land for a further 10,470 units (79%) above the net household need and therefore there is no need to re-zone additional lands or zone new additional lands over and above those currently set out under the current 2016 County Development Plan. Having regard to above figures set out in the Core Strategy and the current excess of zoned land, without the need for further zoning, it is considered that there is sufficient flexibility to meet the household requirements for 2031 and potentially up to 2040. The revised target figures in response to the OPR recommendations, set out separately under the response to the OPR, do not impact on the excess land capacity available to meet the revised targets. Therefore, to re-zone or zone new additional lands over and above those currently set out in the Draft Plan would be contrary to National and Regional planning policy.</p> <p>In this context, the rezoning of the subject lands would undermine the delivery of households within strategic residential growth sites identified within the Regional Metropolitan Area Strategic Plan at: Adamstown, Clonburris, Tallaght, Naas Road and Fortunestown which would be contrary to National and Regional Planning Policy. Therefore, to re-zone or zone new additional lands over and above those currently set out in the Draft Plan would be contrary to National and Regional planning policy.</p> <p>Furthermore, the Land Capacity Audit, which informs the Core Strategy, comprised a comprehensive review and analysis to calculate the potential yield of undeveloped land (RES, RES-N, TC, REGEN, VC, DC, LC and SDZ) zoned in the 2016 - 2022 County Development Plan. Within this total capacity, approximately 150 ha of Long-Term Strategic lands providing for more than 7,500 units have been identified as being deliverable over the Development Plan period and are included in the land capacity figures.</p> <p>In addition, and as noted above, it is recognised that South Dublin County has a physical excess of zoned lands to meet the</p>
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		<p>population and housing targets set out under national and regional policy. These lands are located, for the most part, within existing built-up areas in Dublin City and Suburbs and will, therefore, support compact growth.</p> <p>In supporting the compact growth agenda, the Development Plan has placed a significant emphasis on deliverability, monitoring, growth, and active land management. In this regard, the Draft Plan acknowledges the need for the delivery of a compact growth agenda and includes a range of measures which promote development.</p> <p>It is also noted that the subject lands are adjacent to Adamstown SDZ which has seen and will continue to see considerable growth at the western extremity of South Dublin's lands, on the border with Kildare. The extent of this population and physical growth will take time for new and existing communities to become established and providing for further extensive growth would not be appropriate and would have to be considered in the future in light of options for compact growth. Furthermore, given the border location with Kildare County Council (KCC) and recognising the increasing coalescence of settlement and economic development between KCC and South Dublin County Council (SDCC), G11 Objective 6 of the Draft Plan seeks to collaborate with KCC to identify a common approach to a greenbelt/green spaces between the growing settlements within the lifetime of the Development Plan.</p> <p>It is therefore considered that to rezone the subject lands or extend the SDZ would undermine the provisions of the Draft Plan for compact growth having regard to the excess capacity of exiting zoned lands to meet the required targets and be at variance with National and Regional policies and objectives.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan</p>
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<p>SD-C195-244 Castlethorn Construction</p>	<p>The submission relates to lands located at Ballymakailly, Gollierstown and Colscuddan, adjoining to the south and southwest of Adamstown, Lucan (Adamstown South).</p> <p>The subject lands at Adamstown South comprise of 175 Ha are currently zoned 'RU' Rural &amp; Agriculture Zoning Objective and it is requested that the subject lands be designated a Strategic Development Zone (SDZ).</p> <p>However, the submission notes the long lead-in time from designation / re-zoning to plan preparation for a SDZ and the submission requests that the subject lands be recognised as a Strategic Land Reserve under the forthcoming Development Plan 2022-2028 with a commitment to pursue its designation as a Strategic Development Zone (SDZ).</p> <p>The submission requests a parallel commitment should these lands for whatever reason not be designated as an SDZ that they alternatively be advanced by way of a proposed Variation to be rezoned as Residential to be developed in accordance with an approved Local Area Plan and to seek to prepare that LAP during the life of the forthcoming County Development Plan.</p> <p>The submission sets out a number of reasons justifying the requests for the subject lands to include the following:</p> <ul style="list-style-type: none"> <li>• Strategically located in terms of public transport options;</li> <li>• Positioned between the major 'new town' settlement of Adamstown and adjacent to a new District Centre and associated physical and social infrastructure and the premier employment centre of Grange Castle Business Park;</li> <li>• Aligns with NPF and RSES with regard to compact growth and proximity to transport nodes;</li> </ul>	<p><b>CE Response:</b></p> <p>The subject lands, 175 ha, are zoned RU Rural, in the Draft Plan and lie to the west of Adamstown SDZ. The Core Strategy and Settlement Strategy in Chapter 2 sets out population and housing figures which must be consistent with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) as required under the Planning and Development Act 2000 (As Amended) and also confirms that the County has enough land for a further 10,470 units (79%) above the net household need and therefore there is no need to re-zone additional lands or zone new additional lands over and above those currently set out under the current 2016 County Development Plan. Having regard to above figures set out in the Core Strategy and the current excess of zoned land, without the need for further zoning, it is considered that there is sufficient flexibility to meet the household requirements for 2031 and potentially up to 2040. The revised target figures in response to the OPR recommendations, set out separately under the response to the OPR, do not impact on the excess land capacity available to meet the revised targets. Therefore, to re-zone or zone new additional lands over and above those currently set out in the Draft Plan would be contrary to National and Regional planning policy.</p> <p>In this context, the designation of the subject lands as a strategic land reserve would undermine the delivery of households within strategic residential growth sites identified within the Regional Metropolitan Area Strategic Plan at: Adamstown, Clonburris, Tallaght, Naas Road and Fortunestown which would be contrary to National and Regional Planning Policy. Therefore, to re-zone or zone new additional lands over and above those currently set out in the Draft Plan would be contrary to National and Regional planning policy.</p> <p>Furthermore, the Land Capacity Audit, which informs the Core Strategy, comprised a comprehensive review and analysis to calculate the potential yield of undeveloped land (RES, RES-N, TC,</p>
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	<ul style="list-style-type: none"> <li>• Considerably increases the catchment and fully capitalises on the physical and social infrastructure at Adamstown;</li> <li>• Considers it necessary for a Local Authority to zone more serviced land in the Draft plan in order to provide choice in sites locally and resilience in housing supply coming forward;</li> <li>• Considers the development plan should look beyond the statutory 6-year cycle and seek to identify key residential landbanks; and</li> <li>• Development on the subject lands could be laid out across a network of interconnected green corridors and landscape linkages to prioritise pedestrian and cycle movements and ensure exceptional permeability with Adamstown to the north and Grange Castle to the south.</li> </ul> <p>The submission notes Appendix 3 of the NPF and argues this should be conducted from first principles and not simply form an assessment of existing zoned lands to demonstrate compliance.</p> <p>The submission notes the role of the Council's Land Management and monitoring functions during the life of the Development Plan.</p>	<p>REGEN, VC, DC, LC and SDZ) zoned in the 2016 - 2022 County Development Plan. Within this total capacity, approximately 150 ha of Long-Term Strategic lands providing for more than 7,500 units have been identified as being deliverable over the Development Plan period and are included in the land capacity figures.</p> <p>In addition, a thorough Infrastructure Assessment and Social Infrastructure Audit was carried out that built on the initial Land Capacity Analysis. This assessment gathered pertinent data on identified lands in relation to their infrastructural constraints and requirements in order to differentiate between zoned land that is available for development and zoned land that requires significant further investment in services for infrastructure for development to be realised. This identifies the assets in each settlement and opportunities to ensure further growth is provided for in tandem with social and physical infrastructure.</p> <p>As noted above, it is recognised that South Dublin County has a physical excess of zoned lands to meet the population and housing targets set out under national and regional policy. These lands are located, for the most part, within existing built-up areas in Dublin City and Suburbs and will, therefore, support compact growth.</p> <p>In supporting the compact growth agenda, the Development Plan has placed a significant emphasis on deliverability, monitoring, growth, and active land management. In this regard, the Draft Plan acknowledges the need for the delivery of a compact growth agenda and includes a range of measures which promote development.</p> <p>It is also noted that the subject lands are adjacent to Adamstown SDZ which has seen and will continue to see considerable growth at the western extremity of South Dublin's lands, on the border with Kildare. The extent of this population and physical growth will take time for new and existing communities to set up and providing for further extensive growth would not be appropriate and would have to be considered in the future in light of options for compact growth.</p>
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<b>Regeneration Zoning Submission</b>		
<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation</b>
<a href="#">SD-C195-73 Prismline Ltd</a>	<p>The submission seeks for the lands at the Naas Road (surrounded by SIAC Land at Monastery Road to the north, the N7 to the south and St. Brigids Cottages to the west) to be rezoned objective REGEN – “To facilitate enterprise and/or residential-led regeneration subject to a development framework or plan for the area incorporating phasing and infrastructure delivery”.</p>	<p><b>CE Response:</b></p> <p>The Draft Plan sets out a potential for 31,824 jobs assuming an average of 51 jobs per hectare. In addition to this, there are 425ha of Regeneration (REGEN) zoned brownfield land forming part of the Tallaght Town Centre LAP and the City Edge area, both areas are located in close proximity to the subject lands. While the proposal for a rezoning is noted, there remains a need within the County for lands to facilitate general employment type uses in</p>



	<p>The subject lands (c.3 hectares) are currently zoned Enterprise and Employment (EE) with a small element of Residential (RES).</p> <p>The submission highlights a number of points as to why the lands should be zoned REGEN to include the following:</p> <ol style="list-style-type: none"> <li>1. Lands represent notably large (c.3Ha), underutilised, brownfield lands.</li> <li>2. Increased flexibility which a zoning of this nature would have and the benefit of being able to provide a mixed-use development.</li> <li>3. Existing vacant and unkempt structures on the site seriously detract from the visual amenity of the area.</li> <li>4. Lands represent underutilised, brownfield lands that are in close proximity to high quality public transport hub.</li> <li>5. Lands are fully serviceable and 'ready to go'.</li> <li>6. There are no known constraints associated with the development of the lands.</li> <li>7. Subject lands is highly unlikely to have any impact in respect of Appropriate Assessment.</li> <li>8. REGEN zoning would be compatible with adjoining residential development and light industrial uses.</li> </ol> <p>The submission also highlights that the Draft Plan seeks to encourage reuse of underutilised vacant land and buildings referencing the Draft Plan with respect to compact growth and a strong focus on regeneration and the redevelopment of brownfield over green field lands and specifies zoning objectives CS4 Objective 2 and H1 Objective 9.</p> <p>The submission acknowledges Variation No.3 to the current development plan and the rezoning of brownfields lands to</p>	<p>order to facilitate a range of continued economic development and employment growth in the County over the Plan period. It is considered inappropriate to rezone the lands as requested given the on-going need for general employment lands and the surplus capacity of zoned residential land in the County.</p> <p>Furthermore, the subject site is located within an established industrial setting and the existing EE zoned site forms part of the Economic Strategy of the Draft Plan. It is also noted that the REGEN land use zoning is strategic in nature, and the application of the REGEN zoning in a piecemeal fashion is not recommended as it would undermine the Core Strategy of the Draft Plan and intention of the REGEN zoning. In addition, the County Development Plan seeks to guide enterprise and employment development to appropriate locations by identifying economic clusters. The zoning of the subject lands for EE to support enterprise and employment is therefore considered appropriate in this instance.</p> <p><b>CE Recommendation:</b> No change to Draft Plan</p>
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	<p>Rgen inside the M50. In this regard it is submitted that the lands are only marginally outside the M50 and it is contended that the subject lands are equally advantageous, with access to the Red Cow LUAS stop nearby and access to Clondalkin village.</p>	
<p>SD-C195-188 Circle K Ireland Energy Group Limited</p>	<p>Submission deals with Petrol Station located on the southern side of the Naas Road East, Dublin, located close to the suburbs of Ballymount, Drimnagh and Clondalkin. There is an established commercial business operating a petrol/service station on site.</p> <p>This submission endorses the proposed zoning and requests maintaining the proposed 'Regen' zoning in light of strong and sustained planning merits.</p>	<p><b>CE Response:</b></p> <p>The lands lie within the strategic regeneration area of the Naas Road and the CityEdge Project. The lands within the CityEdge Project, comprising almost 700ha in total, are subject to an on-going framework plan which will be followed by a statutory plan. The lands are zoned for regeneration in the 2016 Development Plan, the zoning of which is retained in the current Draft Plan. The support and endorsement to retain the existing REGEN zoning is noted.</p> <p><b>CE Recommendation:</b> No change to Draft Plan.</p>
<p>SD-C195-143 Associated Rewinds Limited</p>	<p>The submission relates to lands located on corner of Whitestown Road/Whitestown Way, Tallaght and request the subject lands be rezoned from EE 'Employment and Enterprise' to REGEN 'Regeneration'.</p> <p>The submission states the urgency of the housing crisis and the commitments of the Government's Housing For All Plan and highlights the need to identify and appropriately zone strategically located lands adjacent to existing services and transport infrastructure and land that has lain undeveloped for decades.</p> <p>The submission argues that the subject lands are a fit for this category and it is acknowledged that this has been recognised in the Tallaght Town Centre Local Area Plan.</p> <p>The submission mentions that to remove any potential obstacles in bringing these lands to the market for</p>	<p><b>CE Response:</b></p> <p>The Draft Plan sets out a potential for 31,824 jobs assuming an average of 51 jobs per hectare. In addition to this, there are 425ha of Regeneration (REGEN) zoned brownfield land forming part of the Tallaght Town Centre LAP and the Naas Road area. The subject lands are located in Tallaght Town Centre LAP and both are located in close proximity to the Naas Road lands.</p> <p>While the proposal for a rezoning is noted, there remains a need within the County for lands to facilitate general employment type uses in order to facilitate a range of continued economic development and employment growth in the County over the Plan period. It is considered inappropriate to rezone the lands as requested given the on-going need for general employment lands and the surplus capacity of zoned residential land in the County.</p>

	<p>development a zoning change to REGEN, mirroring adjacent property zoning, would be more appropriate.</p> <p>The submission provides 2 maps to illustrate the subject site and its context within the Tallaght LAP.</p>	<p>Furthermore, the subject site is located within an established industrial setting, and it is considered that the existing EE zoned site forms part of the Economic Strategy of the Draft Plan. As such, having regard to the context and characteristics of the subject lands, it is considered that the lands would be incompatible with the primary objective of REGEN zoning 'to facilitate enterprise and/or residential-led regeneration'. It is also noted that the REGEN land use zoning is strategic in nature, and the application of the REGEN zoning in a piecemeal fashion is not recommended as it would undermine the Core Strategy of the Draft Plan and intention of the REGEN zoning.</p> <p>The County Development Plan seeks to guide enterprise and employment development to appropriate locations by identifying economic clusters. The current zoning of the subject lands as EE to support enterprise and employment is therefore considered appropriate in this instance.</p> <p><b>CE Recommendation:</b> No change to Draft Plan</p>
SD-C195-60 Quanta Capital	<p>The submission relates to eight sites (sites no. 1 to 7 are zoned with land use objective REGEN, and site no. 8 is zoned with land use objective EE). It is submitted that site No. 8 should be rezoned REGEN as the current EE zoning objective possesses a limitation on the development options for site No. 8.</p> <p>All sites are located within the Ballymount Industrial Estate, which extends to the south of Long Mile Road and west of the Walkinstown Avenue, along the Dublin City Council's administrative boundary and which form part of the lands identified for regeneration and development along the Naas Road within South Dublin's administrative area.</p> <p>The submission highlights a number of reasons as to why the site should be zoned REGEN:</p>	<p><b>CE Response:</b></p> <p>The support for The Active Land Management Approach in particular for Policy CS1, CS2, CS7 QDP8 and Objective 2 as set out in the Draft Plan is noted and welcomed.</p> <p>The Draft Plan sets out a potential for 31,824 jobs assuming an average of 51 jobs per hectare. In addition to this, there are 425ha of Regeneration (REGEN) zoned brownfield land forming part of the Tallaght Town Centre LAP and the Naas Road Lands within which the subject site is located . While the proposal for a rezoning is noted, there remains a need within the County for lands to facilitate general employment type uses in order to facilitate a range of continued economic development and employment growth in the County over the Plan period. It is considered inappropriate to rezone the lands as requested given the on-going need for general</p>

	<ul style="list-style-type: none"> <li>• To ensure consistency in the development strategy for the Naas Road lands;</li> <li>• Potential for redevelopment and re-intensification of the brownfield lands identified as part of the strategic masterplan being prepared for City Edge (the Naas Road/Ballymount area);</li> <li>• The site has locational advantages in terms of its strategic location and access to public transport;</li> <li>• All social, community and recreational amenities are within walking distance;</li> <li>• Supports National, Regional and local planning policy; and</li> <li>• Supports the need for a greater supply of apartment and apartment living design.</li> </ul> <p>The submission also outlines their support for Policy CS1, CS2, CS7 QDP8 and Objective 2 as set out in the draft Plan.</p> <p>The submission requests the Council to support and prioritise the preparation and implementation of the masterplan for the lands along the Naas Road area during the lifetime of the new Development Plan.</p>	<p>employment lands, the existing quantum of Regen lands and the surplus capacity of zoned residential land in the County.</p> <p>Variation no. 3 to the 2016 Development Plan changed the zoning objective of 178 hectares of lands in the Ballymount / Naas Road area from zoning objective EE (Enterprise and Employment) to zoning objective REGEN (Regeneration). This rezoning extended the existing Regen zoning to the south around Walkinstown. The zoning provided for plan-led development and purposefully retained an extent of EE zoning in the area, recognising the continuing need for this employment zoning and the preferred location adjacent to the M50. The Naas Road/ Ballymount lands form a significant landbank within South Dublin adjoining Dublin City Council. The development of this area requires significant investment and site assembly to enable the full development potential and will be subject to a Strategic Framework Plan which will inform the further preparation of a LAP or equivalent statutory plan in collaboration with Dublin City Council. The proposed rezoning is not required and would represent an ad-hoc zoning within the wider EE objective.</p> <p>In relation to the preparation of the Naas Road Framework Plan, this is progressing as the CityEdge Project and has gone through a first phase of public consultation. The Framework Plan will inform a statutory plan which will commence in 2022.that the preparation of both plans is set out in Policy CS2 of the Draft Plan.</p> <p><b>CE Recommendation:</b> No change to Draft Plan</p>
SD-C195-250 O'Flynn Group	<p>The submission relates to a c. 7.33 hectare (approx. 18 acres) brownfield site on Naas Road and cites the recent permissions for development at this former Nissan site which would act as catalyst for the regeneration of the Naas Road area.</p> <p>The submission requests the following to be undertaken:</p>	<p><b>CE Response:</b></p> <p>The issues raised in the submission are noted. The subject lands in question are located outside the administrative area for South Dublin and are located within administrative area of Dublin City Council. The lands do however form part of lands within the City Edge project.</p>

	<ul style="list-style-type: none"> <li>• Actively pursue the proposed policies and objectives set out in the Draft Plan regarding the regeneration and redevelopment of the extensive brownfield/infill lands at the Naas Road, Ballymount and Park West area.</li> <li>• Engage with all relevant stakeholders, including the landowner, as part of the plan making process currently being prepared by SDCC in collaboration with DCC for the regeneration of these lands.</li> <li>• Recognise the planning permissions that exist for the redevelopment of lands at the Naas Road and ensure that in this interim period, i.e., while the Development Framework and subsequent plans are being prepared, that supporting the activation of these permissions is prioritised.</li> </ul> <p>The submission mentions the Masterplan provided for the subject site and the collaborative effort between the landowner and DCC for such, and it is submitted that the plan making team for the Development Framework and subsequent Local Area Plan or similar mechanism as identified in Objective CS2 of the Draft South Dublin Plan should engage with the landowner to consider the optimum land use strategy for Phase 3, having regard to the current work being undertaken by the local authorities.</p> <p>The submission details the approved Development - Southwest Gate (Reg. Ref. 3228/20) granted in 2021 and submits that having regards to the scale of the development together with its location advantage at a critical node on Naas Road, implementation of this permission would act as a catalyst for regeneration of lands within the wider area. It requests that the plans proposed under Objective CS2 of the Draft South Dublin Plan do not affect the delivery of this permission. It submits that phased and sequential development can have unintended consequences in the context of permitted developments, and that this must be</p>	<p>In response to National Policy, the City Edge project sees Dublin City and South Dublin County Council working together to plan for a sustainable and resilient future for this area, the people who live and work there, but also setting out how this area could play an important role in supporting a sustainable future for Dublin.</p> <p>The preparation of the plan is supported under Policy CS2 of the Draft Plan. CS2 Objective 2 is of particular note with the plan seeking ‘to facilitate a co-ordinated approach and vision to any future sustainable development of the Naas Road Framework area in consultation with Dublin City Council, and all relevant stakeholders including the local community, and ensure that the needs of the existing and new community will be met, and the provision of necessary community and physical infrastructure is delivered in tandem with any new development’. It is noted that there is a CE Recommendation to amend this objective so that it also provides for the needs of operations of existing business.</p> <p>The city edge project is progressing and has gone through a first phase of non-statutory public consultation. The Framework Plan will inform a statutory plan which will commence in 2022 and will be subject to further consultation.</p> <p>In regard to the issue of existing permissions. The framework plan will be developed in a manner which provides for a co-ordinated approach and vision to any future sustainable development of the area with a focus on key nodes as catalysts for the further development of the overall regeneration lands.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
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	given full consideration so as not to undermine the timely implementation of Southwest Gate and other local permissions that provide for regeneration opportunities.	
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### Employment and Enterprise Zoning Submission

Submission No.	Submission Summary	CE response and recommendation
<a href="#">SD-C195-75 Declan Brassil</a>	<p>Submission relates to lands at Busty Hill, Naas Road, Co. Dublin, immediately north of N7 Junction 5, for the rezoning of approx. 17 ha from RU to EE. It is indicated that this would facilitate the timely release of zoned REGEN lands on the Naas Road/Ballymount area in the same ownership.</p> <p>Submission highlights the benefits of the highly accessible exiting road infrastructure, with access to the N7/M7, with the provision of EE uses reinforcing existing logistic and warehouse uses established on lands in the immediate area.</p> <p>Submission goes on to state that the the proposed zoning would maximise the opportunity of the motorway interchange for employment generating uses, while supporting policies within the National Planning Framework, Regional Spatial and Economic Strategy and the Draft Plan. The proposed zoning can facilitate the future consolidation of the City footprint at sustainable densities through the regeneration of underutilised and brownfield sites and can support and enable the relocation of the landowners activities to a more appropriate employment location.</p> <p>The removal of a Traveller Accommodation (TA) objective from lands adjacent Athgoe Junction (J5) of the N7 is also requested.</p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted.</p> <p>The Draft Plan under EDE1 Objective 3 looks to ensure that there is sufficient supply of zoned and serviced lands at suitable locations to accommodate a range of enterprise and employment development types and to promote growth by strengthening the integration between employment, housing and transportation.</p> <p>Under Section 2.6.8 Employment Lands, the Draft Plan carried out an analysis of available lands which have potential to generate jobs. The purpose of this analysis was to ascertain whether sufficient employment lands are zoned to provide for the projected additional workforce for the Plan period up to 2028. Based on the analysis, there is a total capacity, excluding REGEN lands, to develop 624 hectares to facilitate further employment. This would more than meet the projected employment growth of 18,336 jobs over the Plan period set out in section 2.6.8 of the Core Strategy in the Draft Plan.</p> <p>The location of future employment needs in SDCC is not reliant solely on the Objective 'EE' zoned employment lands but rather spread across a range of zoning categories including REGEN, SDZ, MRC, RW and LC/VC/DC/ TC, where commercial development is either 'Permitted in Principle' or 'Open for Consideration'.</p>

	<p>Submission believes that the area is not an appropriate location for residential development and is contrary to a number of objectives in the Draft Plan.</p> <p>Submission goes on to states that traveller accommodation at this site would be inconsistent with NPO 28 of the NPF and RPO 9.2 of the RSES.</p> <p>A File note from Clifton Emerson on Water, Foul Drainage and Traffic Impact was attached with this submission, which was considered.</p>	<p>The submissions received from the OPR and EMRA welcomed the evidence-based approach that has informed the strategy in the Draft Plan and considered the existing land zoned for employment to be consistent with the RSES Guiding Principles for the Dublin Metropolitan Area and employment land and consistent with RPO 4.3.</p> <p>Objective CS5 Objective 4 sets out the commitment to monitor and further develop the database of employment lands within the County. As set out above, the employment evidence base prepared to support the draft County Development Plan demonstrates that there is sufficient land available to support the future identified employment needs. However, the Council does recognise that trends in the wider economy can quickly impact on employment lands, and as such the Council considers it will be important to monitor this situation and will undertake a further evidence-based analysis of employment lands in the County within two years of the Plan coming into effect. Should a need be identified for further employment zoning within the lifetime of the Plan a Variation to the Plan will be initiated informed by:</p> <ul style="list-style-type: none"> <li>• Analysis of the type of employment need</li> <li>• Analysis of the appropriate location/s to serve such need</li> <li>• Relevant National and Regional policy and proper planning and sustainable development.</li> </ul> <p>Taking the above into consideration it is considered that the zoning should remain as is in the Draft Plan but that a new objective should be inserted into the Plan reflecting the need to continue to monitor the capacity of employment lands and to make amendments to zoning through an appropriately informed process aligning with national and regional planning policy.</p> <p>Issues raised in this submission relating to Traveller Accommodation are responded to in the section of the CE Report on Chapter 6, Housing.</p>
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<p>SD-C195-17 Donal Pat Cleary</p>	<p>The submission seeks to rezone 77 .26 hectares from RU – Rural to EE - Enterprise and Employment, at Colmanstown, Keating's Park, Bustyhll and Athgoe adjacent to northbound N7 and south of Newcastle. Furthermore, it is put forward that the zoning be site specific and state “To promote the development of a sustainable agri-food hub at Colmanstown Lane, Keating's Park, Athgoe, Bustyhill Area”. The submission indicates that the vision for Colmanstown Lane, Athgoe, Keating's Park, Bustyhill site is to create local employment and a new Sustainable Agri-Food Hub for the region in line with Government and South Dublin County Council policies and objectives. It is suggested that permissible uses may include agri-food value added activities, agri-food storage, and processing. The benefits of clustering such business are outlined.</p> <p>The submission further notes that there is an existing residential cluster on the lands with Colmanstown Lane being the only access/exit to their properties with no other alternative access routes.</p>	<p><b>CE Response:</b></p> <p>The issues raised in the submission are noted.</p> <p>The Draft Plan under EDE1 Objective 3 looks to ensure that there is sufficient supply of zoned and serviced lands at suitable locations to accommodate a range of enterprise and employment development types and to promote growth by strengthening the integration between employment, housing and transportation.</p> <p>Under Section 2.6.8 Employment Lands, the Draft Plan carried out an analysis of available lands which have potential to generate jobs. The purpose of this analysis was to ascertain whether sufficient employment lands are zoned to provide for the projected additional workforce for the Plan period up to 2028. Based on the analysis, there is a total capacity, excluding REGEN lands, to develop 624 hectares to facilitate further employment. This would more than meet the projected employment growth of 18,336 jobs over the Plan period set out in section 2.6.8 of the Core Strategy in the Draft Plan.</p> <p>It is noted that the location of future employment in SDCC will not be located solely within the Objective ‘EE’ zoned employment</p>



	<p>It is proposed that the rezoning form part of a plan to provide an alternative access/exit onto N7 at the Athgoe interchange set out in Appendix 1 to the submission and a rationale is provided for this including safety for existing landowners and that the timeframe for long term proposals for the upgrade of the N7 and Trans T Network is unknown.</p> <p>The submission notes the role of Rural Settlements and Rural Nodes. It is proposed that settlements will sustain as local centres for rural catchments with growth appropriate to cater for local demand while Rural Nodes will accommodate limited development at a sustainable scale for local demands by way of small-scale individual developments.</p>	<p>lands but rather spread across a range of zoning categories including REGEN, SDZ, MRC, RW and LC/VC/DC/ TC, where commercial development is either 'Permitted in Principle' or 'Open for Consideration'.</p> <p>It is highlighted that the submissions received from the OPR and EMRA welcomed the evidence-based approach that has informed the strategy in the Draft Plan and considered the existing land zoned for employment to be consistent with the RSES Guiding Principles for the Dublin Metropolitan Area and employment land and consistent with RPO 4.3.</p> <p>It is acknowledged that the submission is specifically looking for an agri-hub however, the proposed underlying zoning would be EE which has a much broader land use potential than agri-hub.</p> <p>It is also acknowledged that agri-hubs have started to emerge in recent years, allowing farmers in the agri-food sector to realise the digitisation of agriculture by fostering an agricultural innovation ecosystem dedicated to excellence, sustainability and success, now evolving to smart agri-hubs.</p> <p>Policy EDE18 Rural Economy of the Draft Plan supports sustainable rural enterprises within South Dublin, whilst protecting the rural character of the countryside and minimizing environmental impacts. Furthermore, section 13.7.4 of the Draft Plan indicates that new rural enterprise will be encouraged on RU zoned lands subject to a number of criteria, including the capacity of the local road network and the scale and nature of the proposed development.</p> <p>The Newcastle Lowlands where the proposed area of land is located is part of the Newcastle Lowlands as identified in the <i>Landscape Character Assessment</i>. The Newcastle Lowlands function as an important agricultural resource but are vulnerable to urbanising pressures.</p>
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		<p>monitor this situation and update the current evidence-based analysis of employment lands in the County within two years of the Plan coming into effect. Should a need be identified for further employment zoning within the lifetime of the Plan a Variation to the Plan will be initiated informed by:</p> <ul style="list-style-type: none"> <li>• Analysis of the type of employment need</li> <li>• Analysis of the appropriate location/s to serve such need</li> <li>• Relevant National and Regional policy and proper planning and sustainable development.</li> </ul> <p>Taking the above into consideration it is considered that the proposed zoning with proposed associated identification of specific uses is not appropriate at this time.</p> <p><b>CE Recommendation:</b></p> <p>To insert a <b>new objective into Policy CS5</b> to read:</p> <p><b>To ensure, that as part of the two-year statutory review of the Development Plan, an evidence-based analysis of employment lands will be undertaken and should there be evidence for the need for further employment zoning within the lifetime of the Plan, a Variation to the Plan will be immediately initiated informed by:</b></p> <ul style="list-style-type: none"> <li>• <b>Analysis of the type of employment need</b></li> <li>• <b>Analysis of the appropriate location/s to serve such need</b></li> <li>• <b>Relevant National and Regional policy and proper planning and sustainable development.</b></li> </ul>
<p><a href="#">SD-C195-56 Rohan Holdings Ltd.</a></p>	<p>This submission relates to land zoned EE located at South West Business Park, located on the eastern edge of Citywest Business Campus. It states that the existing EE zoning is appropriate land use zoning designation for the site, as it will unlock further potential for the wider Citywest area. They also</p>	<p><b>CE Response:</b></p> <p>The request to retain the EE zoning on the site is noted.</p> <p>The Citywest Business Campus provides employment opportunities, with EDE1 Objective 5 looking to promote the high-tech, manufacturing and research and development in Citywest.</p>

	<p>state that it will consolidate the built area of South West Business Park.</p> <p>The submission also states that the landowners have shown commitment to development on site, following the lodgment of 2 planning applications (SD21A/0150 and SD21A/0199), continuing sustainable and appropriate growth in the area.</p>	<p>The South West Business Campus referenced in the submission remains zoned EE in the Draft Plan.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
<p><a href="#">SD-C195-74 BMA Planning</a></p>	<p>The submission is made in respect of lands located at Newcastle Road, Lucan. Co. Dublin and seeks a change of zoning from RU to EE and/or a SLO to facilitate existing and proposed uses. The subject lands (c. 2.55ha) are situated west of and accessed from the R120 Newcastle Road via an existing driveway shared with the adjoining Kilsaran premises. The lands subject to this submission are divided across two parcels with the northern parcel being warehouse/showroom buildings and hardstanding areas occupied by Lucretia Tiles (c.2.03ha) located north of the access driveway and the southern parcel (c.0.52ha) located south of the access road between Kilsaran and the R120. The southern section comprises an undeveloped greenfield site stated to be a valuable employer and thriving business of 25 years standing.</p> <p>The submission notes that the subject lands form part of an established employment zone on the Newcastle Road. However, it is contended that the current Draft Development Plan policy and zoning objectives do not recognise the significance and status of these established employment uses as it is zoned objective RU.</p> <p>The submission refers to Policy EDE1 and EDE1 Objective 3 within the Draft Plan and submits that the Draft Plan should ensure that the Sentry Investments lands at Newcastle Road are recognised as an established area of employment.</p>	<p><b>CE Response:</b></p> <p>The issues raised in the submission are noted.</p> <p>The Draft Plan under EDE1 Objective 3 looks to ensure that there is sufficient supply of zoned and serviced lands at suitable locations to accommodate a range of enterprise and employment development types and to promote growth by strengthening the integration between employment, housing and transportation.</p> <p>Under Section 2.6.8 Employment Lands, the Draft Plan carried out an analysis of available lands which have potential to generate jobs. The purpose of this analysis was to ascertain whether sufficient employment lands are zoned to provide for the projected additional workforce for the Plan period up to 2028. Based on the analysis, there is a total capacity, excluding REGEN lands, to develop 624 hectares to facilitate further employment. This would more than meet the projected employment growth of 18,336 jobs over the Plan period set out in section 2.6.8 of the Core Strategy in the Draft Plan.</p> <p>It is noted that the location of future employment in SDCC will not be located solely within the Objective 'EE' zoned employment lands but rather spread across a range of zoning categories including REGEN, SDZ, MRC, RW and LC/VC/DC/ TC, where commercial development is either 'Permitted in Principle' or 'Open for Consideration'.</p> <p>It is further highlighted that the submissions received from the OPR and EMRA welcomed the evidence-based approach that has</p>

	<p>The submission proposes that this can be achieved through the insertion of a Specific Local Objective and/ or the zoning of the lands for “Enterprise and Employment (EE)” or similar uses such as:</p> <p>1. Insert the following Specific Local Objective (SLO) into the upcoming Development Plan at Section 9.0.4 : “EDE1 SLO1 To facilitate the consolidation and expansion of the Lucretia Tiles premises and adjoining lands at Newcastle Road, Lucan for light industrial, employment and warehousing uses.”</p> <p>And/or</p> <p>2. Provide a suitable zoning objective for the existing Lucretia Tiles premises and adjoining lands at the Newcastle Road, Lucan, “EE – Enterprise and Employment” or similar, within the forthcoming Development Plan 2022 – 2028.</p> <p>The submission outlines a rationale as to why the proposal should be adopted including that the lands are serviced and accessible to rail and road with long standing light industrial use in proximity to zoned development land.</p>	<p>informed the strategy in the Draft Plan and considered the existing land zoned for employment to be consistent with the RSES Guiding Principles for the Dublin Metropolitan Area and employment land and consistent with RPO 4.3.</p> <p>It is acknowledged that the northern parcel of lands subject to the submission have been in use as Lucretia Tiles since 1996 and that the lands are zoned RU. It is noted that various planning applications have been granted over the years for amendments and modifications to the buildings, part of Lucretia Tiles. Section 13.1.1, (vi) Non-Conforming Uses of the Draft Plan states there are instances throughout the County where land uses do not conform with the zoning objective of a site. Developments which were in existence on 1<sup>st</sup> October 1964 or have a valid permission, particularly those that would intensify non-conforming uses, will be permitted only where the proposed development would not be detrimental to the amenities of the surrounding area and would accord with the principles of proper planning and sustainable development. This includes the integration of land use and transport planning.</p> <p>It is considered that any intensification to the uses on site would continue to be considered on their merits having regard to Section 13.1.1 (vi) in the Draft Plan.</p> <p>The rationale being put forward for EE zoning on the two sites is understood. However, it is considered premature having regard to the rapidly changing surrounding urban context. In this regard, development at Clonburriss SDZ will stretch from the R120 at its western edge. This will create a new urban context to the road immediately opposite the proposed EE zoning.</p> <p>In addition, the site is also located adjacent to the 12<sup>th</sup> Lock, forming part of the Grand Canal Greenway to Hazelhatch. The Draft Plan contains EDE4 SLO1:</p> <p><i>To investigate the full potential for the 12th Lock lands as centrally located within growing employment and residential areas, with</i></p>
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<p>SD-C195-238 South Dublin Chamber</p> <p>SD-C195-254 Deputy Emer Higgins</p>	<p>It is believed that there is not sufficient lands zoned EE to cater for the existing businesses seeking to expand or for inward investment of new businesses in the medium let alone long term. It is stated that traditional industrial estates do not have enough capacity to deal with regeneration displacement which may occur during the plan.</p> <p>The issue at this time is how do existing businesses expand in the areas they are currently located and how do these businesses optimise our county's location with the shift in business patterns and business land use caused by Covid, Brexit and internet shopping.</p> <p>Rezoning of additional land for EE is strongly advocated for during the CDP process 2022-2028, stating no land will be suggested to fulfil this purpose, just to take the increased demand into account when setting out the land use requirements.</p> <p>It is stated that with a new plan being finalised for the regeneration of industrial areas around the N7 at the border of the county, there is opportunity to ensure that the jobs currently located in these industrial areas are protected and remain within the county. To achieve this it is indicated that additional areas for Enterprise and Employment need to be zoned.</p>	<p><b>CE Response:</b></p> <p>The Draft Plan under EDE1 Objective 3 looks to ensure that there is sufficient supply of zoned and serviced lands at suitable locations to accommodate a range of enterprise and employment development types and to promote growth by strengthening the integration between employment, housing and transportation.</p> <p>Under Section 2.6.8 Employment Lands, the Draft Plan carried out an analysis of available lands which have potential to generate jobs. The purpose of this analysis was to ascertain whether sufficient employment lands are zoned to provide for the projected additional workforce for the Plan period up to 2028. Based on the analysis, there is a total capacity, excluding REGEN lands, to develop 624 hectares to facilitate further employment. This would more than meet the projected employment growth of 18,336 jobs over the Plan period set out in section 2.6.8 of the Core Strategy in the Draft Plan.</p> <p>It is noted that the location of future employment in SDCC is not located solely within the main Objective 'EE' zoned employment lands but rather spread across a range of zoning categories including REGEN, SDZ, MRC, RW and LC/VC/DC/ TC, where commercial development is either 'Permitted in Principle' or 'Open for Consideration'.</p> <p>It is further highlighted that the submissions received from the OPR and EMRA welcomed the evidence-based approach that has informed the strategy in the Draft Plan and considered the existing land zoned for employment to be consistent with the RSES</p>

		<p>Guiding Principles for the Dublin Metropolitan Area and employment land and consistent with RPO 4.3.</p> <p>Objective CS5 Objective 4 sets out the commitment to monitor and further develop the database of employment lands within the County. As set out above, the employment evidence base prepared to support the draft County Development Plan demonstrates that there is sufficient land available to support the future identified employment needs. However, the Council does recognise that trends in the wider economy can quickly impact on employment lands. As such the Council considers it will be important to monitor this situation and will undertake a further evidence-based analysis of employment lands in the County within two years of the Plan coming into effect. Should a need be identified for further employment zoning within the lifetime of the Plan a Variation to the Plan will be initiated informed by:</p> <ul style="list-style-type: none"> <li>• Analysis of the type of employment need</li> <li>• Analysis of the appropriate location/s to serve such need</li> <li>• Relevant National and Regional policy and proper planning and sustainable development.</li> </ul> <p>Taking the above into consideration it is considered that a new objective should be inserted into the Plan reflecting the need to continue to monitor the capacity of employment lands and to make amendments to zoning through an appropriately informed process aligning with national and regional planning policy.</p> <p><b>CE Recommendation:</b></p> <p>To insert a new objective into Policy CS5 to read:</p> <p>To ensure, that as part of the two year statutory review of the Development Plan, an evidence-based analysis of employment lands will be undertaken and should there be evidence for the need for further employment zoning within the lifetime of the Plan, a Variation to the Plan will be immediately initiated informed by:</p>
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<p>SD-C195-16 Enda Ward</p>	<p>The lands subject to the submission are located lands at Moneenalion Commons Upper Td, Baldonnell.</p> <p>The submission notes that the land is zoned objective RU; to protect and improve rural amenity and provide for the development of agriculture. The submission requests the Council to consider the following points:</p> <ul style="list-style-type: none"> <li>• There are lands zoned EE (employment and enterprise) immediately to the south west and north east of the subject lands.</li> <li>• The lands to the north west comprise Baldonnell airport.</li> <li>• The lands referred to above are fully operational and operating at a high capacity.</li> <li>• There is existing commercial development less than 400m to the north of the subject lands.</li> <li>• The subject lands are fully serviced and have good road infrastructure.</li> </ul> <p>The submission requests the council to rezone the subject lands EE – Employment and Enterprise as it is considered that it is more compatible with existing and proposed development in the immediate vicinity of the subject lands and therefore would be consistent with the proper planning and development of the area.</p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted.</p> <p>The Draft Plan under EDE1 Objective 3 looks to ensure that there is sufficient supply of zoned and serviced lands at suitable locations to accommodate a range of enterprise and employment development types and to promote growth by strengthening the integration between employment, housing and transportation.</p> <p>Under Section 2.6.8 Employment Lands, the Draft Plan carried out an analysis of available lands which have potential to generate jobs. The purpose of this analysis was to ascertain whether sufficient employment lands are zoned to provide for the projected additional workforce for the Plan period up to 2028. Based on the analysis, there is a total capacity, excluding REGEN lands, to develop 624 hectares to facilitate further employment. This would more than meet the projected employment growth of 18,336 jobs over the Plan period set out in section 2.6.8 of the Core Strategy in the Draft Plan.</p> <p>It should be noted that the location of future employment in SDCC is not located solely within the main Objective 'EE' zoned employment lands but rather spread across a range of zoning categories including REGEN, SDZ, MRC, RW and LC/VC/DC/TC, where commercial development is either 'Permitted in Principle' or 'Open for Consideration'.</p> <p>It is further highlighted that the submissions received from the OPR and EMRA welcomed the evidence-based approach that has informed the strategy in the Draft Plan and considered the existing land zoned for employment to be consistent with the RSES</p>

		<p>Guiding Principles for the Dublin Metropolitan Area and employment land and consistent with RPO 4.3.</p> <p>The site in question is also located within the Casement/Baldonnell Security Zone as highlighted on Map 13 General Aviation within the Plan. As stated within the Draft Plan, development affecting the Department of Defence Security Zone surrounding Casement Aerodrome, or any development that might affect the safety, efficiency or regularity of operations at Casement Aerodrome, will be referred to the Department of Defence.</p> <p>Building restrictions occur within the security zone, with no buildings permitted within 10 metres of the edge of the sterile zone (use of this area for car parking may be acceptable). Site layout to be designed with roads and yard areas located near the aerodrome boundary to provide clear lines of sight for monitoring and surveillance.</p> <p>Following a review under the SFRA, the proposed zoning is incompatible with the apparent level of flood risk within the subject lands. The proposed zoning cannot satisfy a justification test (as per the OPW Guidelines for Flood Risk Assessment) as no need for additional EE zoning has been identified as part of the proposed CDP.</p> <p>The proposal to provide for further EE zoning in this area where there is already significant zoned lands within an area identified within the SFRA as having flooding issues, is not appropriate.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
<p>SD-C195-193 Sherri Brennan</p>	<p>This submission is from an operator of a waste company in Greenogue indicating that their growth will require them to acquire another site. It is stated that there is no suitably zoned land available in the Greenogue area or anywhere in the county that could accommodate a use such as theirs. It is</p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted.</p> <p>The Draft Plan under EDE1 Objective 3 looks to ensure that there is sufficient supply of zoned and serviced lands at suitable</p>

	<p>suggested that while there is space within zoned lands at Grange Castle, Citywest and other areas they are not suitable or designed to deal with waste management or industrial uses. It is requested that consideration is given to zoning land for industrial uses in Greenogue and throughout the County.</p>	<p>locations to accommodate a range of enterprise and employment development types and to promote growth by strengthening the integration between employment, housing and transportation.</p> <p>Under Section 2.6.8 Employment Lands, the Draft Plan carried out an analysis of available lands which have potential to generate jobs. The purpose of this analysis was to ascertain whether sufficient employment lands are zoned to provide for the projected additional workforce for the Plan period up to 2028. Based on the analysis, there is a total capacity, excluding REGEN lands, to develop 624 hectares to facilitate further employment. This would more than meet the projected employment growth of 18,336 jobs over the Plan period set out in section 2.6.8 of the Core Strategy in the Draft Plan.</p> <p>It is noted that the location of future employment in SDCC will not be located solely within the Objective 'EE' zoned employment lands but rather spread across a range of zoning categories including REGEN, SDZ, MRC, RW and LC/VC/DC/ TC, where commercial development is either 'Permitted in Principle' or 'Open for Consideration'.</p> <p>It is further highlighted that the submissions received from the OPR and EMRA welcomed the evidence-based approach that has informed the strategy in the Draft Plan and considered the existing land zoned for employment to be consistent with the RSES Guiding Principles for the Dublin Metropolitan Area and employment land and consistent with RPO 4.3.</p> <p>As set out above, the employment evidence base prepared to support the draft County Development Plan demonstrates that there is sufficient land available to support the future identified employment needs. However, the Council does recognise that trends in the wider economy can quickly impact on employment lands, and as such the Council considers it will be important to monitor this situation. As such, the Council will undertake a further evidence-based analysis of employment lands in the County within</p>
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		<p>two years of the Plan coming into effect. Should a need be identified for further employment zoning within the lifetime of the Plan a Variation to the Plan will be initiated informed by:</p> <ul style="list-style-type: none"> <li>• Analysis of the type of employment need</li> <li>• Analysis of the appropriate location/s to serve such need</li> <li>• Relevant National and Regional policy and proper planning and sustainable development.</li> </ul> <p>Having regard to the above it is recommended that a new objective is inserted into the Draft Plan</p> <p><b>CE Recommendation:</b></p> <p>To insert a new objective into Policy CS5 to read:</p> <p>To ensure, that as part of the two year statutory review of the Development Plan, an evidence-based analysis of employment lands will be undertaken and should there be evidence for the need for further employment zoning within the lifetime of the Plan, a Variation to the Plan will be immediately initiated informed by:</p> <ul style="list-style-type: none"> <li>• Analysis of the type of employment need</li> <li>• Analysis of the appropriate location/s to serve such need</li> <li>• Relevant National and Regional policy and proper planning and sustainable development.</li> </ul>
<p><a href="#">SD-C195-97 Mountpark</a></p>	<p>The submission indicates that Mountpark have recently completed and are in the process of constructing significant warehouse and logistics developments in Baldonnell Business Park. It is requested that consideration is given to the extent of lands zoned for employment, logistics and industrial uses, to avoid leakage to other local authority areas. It is suggested that the success of Baldonnell Business Park indicates the demand for such development.</p>	<p><b>CE Response:</b></p> <p>The Draft Plan under EDE1 Objective 3 looks to ensure that there is sufficient supply of zoned and serviced lands at suitable locations to accommodate a range of enterprise and employment development types and to promote growth by strengthening the integration between employment, housing and transportation.</p> <p>Under Section 2.6.8 Employment Lands, the Draft Plan carried out an analysis of available lands which have potential to generate</p>

	<p>It is outlined that this is supported by the 2021 CBRE Ireland Logistic Confidence Index stating, 'Vacancy rates for industrial and logistics property in Ireland reached an all time low below 2% during 2020'.</p> <p>The submission states that the provision of additional employment lands at appropriate locations proximate the strategic road network would facilitate developers such as Mountpark to strengthen the South Dublin economy, with benefits to the wider community.</p>	<p>jobs. The purpose of this analysis was to ascertain whether sufficient employment lands are zoned to provide for the projected additional workforce for the Plan period up to 2028. Based on the analysis, there is a total capacity, excluding REGEN lands, to develop 624 hectares to facilitate further employment. This would more than meet the projected employment growth of 18,336 jobs over the Plan period set out in section 2.6.8 of the Core Strategy in the Draft Plan.</p> <p>It is noted that the location of future employment in SDCC is not located solely within the main Objective 'EE' zoned employment lands but rather spread across a range of zoning categories including REGEN, SDZ, MRC, RW and LC/VC/DC/ TC, where commercial development is either 'Permitted in Principle' or 'Open for Consideration'.</p> <p>It is further highlighted that the submissions received from the OPR and EMRA welcomed the evidence-based approach that has informed the strategy in the Draft Plan and considered the existing land zoned for employment to be consistent with the RSES Guiding Principles for the Dublin Metropolitan Area and employment land and consistent with RPO 4.3.</p> <p>Objective CS5 Objective 4 sets out the commitment to monitor and further develop the database of employment lands within the County. As set out above, the employment evidence base prepared to support the draft County Development Plan demonstrates that there is sufficient land available to support the future identified employment needs. However, the Council does recognise that trends in the wider economy can quickly impact on employment lands. As such the Council considers it will be important to monitor this situation and will undertake a further evidence-based analysis of employment lands in the County within two years of the Plan coming into effect. Should a need be identified for further employment zoning within the lifetime of the Plan a Variation to the Plan will be initiated informed by:</p>
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		<ul style="list-style-type: none"> <li>• Analysis of the type of employment need</li> <li>• Analysis of the appropriate location/s to serve such need</li> <li>• Relevant National and Regional policy and proper planning and sustainable development.</li> </ul> <p>Taking the above into consideration it is considered that a new objective should be inserted into the Plan reflecting the need to continue to monitor the capacity of employment lands and to make amendments to zoning through an appropriately informed process aligning with national and regional planning policy.</p> <p><b>CE Recommendation:</b></p> <p>To insert a new objective into Policy CS5 to read:</p> <p>To ensure, that as part of the two year statutory review of the Development Plan, an evidence-based analysis of employment lands will be undertaken and should there be evidence for the need for further employment zoning within the lifetime of the Plan, a Variation to the Plan will be immediately initiated informed by:</p> <ul style="list-style-type: none"> <li>• Analysis of the type of employment need</li> <li>• Analysis of the appropriate location/s to serve such need</li> <li>• Relevant National and Regional policy and proper planning and sustainable development.</li> </ul>
<p>SD-C195-126 BMA Planning</p>	<p>This zoning submission relates to Blackchurch Business Park, which includes light industrial/warehousing units and associated ancillary office buildings with hard standing and surface car parking. The adjoining site to the north of the site currently accommodates 13,000 sqm of commercial floorspace. (Mapped attached with submission).</p> <p>The subject lands are currently zoned 'RU' which does not reflect the established use of the site at present. The overall Blackchurch Business Park lands should have an EE zoning which would support orderly development in the Plan by</p>	<p><b>CE Response:</b></p> <p>The Draft Plan under EDE1 Objective 3 looks to ensure that there is sufficient supply of zoned and serviced lands at suitable locations to accommodate a range of enterprise and employment development types and to promote growth by strengthening the integration between employment, housing and transportation.</p> <p>Under Section 2.6.8 Employment Lands, the Draft Plan carried out an analysis of available lands which have potential to generate jobs. The purpose of this analysis was to ascertain whether sufficient employment lands are zoned to provide for the projected</p>

	<p>providing greater certainty regarding any future development proposal.</p> <p>If the land is not rezoned from RU to EE, the submitter believes the following SLO should be included in the CDP:</p> <p>'To facilitate consolidation and expansion of Blackchurch Business Park, Rathcoole for light industrial, employment and warehousing uses'.</p>	<p>additional workforce for the Plan period up to 2028. Based on the analysis, there is a total capacity, excluding REGEN lands, to develop 624 hectares to facilitate further employment. This would more than meet the projected employment growth of 18,336 jobs over the Plan period set out in section 2.6.8 of the Core Strategy in the Draft Plan.</p> <p>It is noted that the location of future employment in SDCC will not be located solely within the Objective 'EE' zoned employment lands but rather spread across a range of zoning categories including REGEN, SDZ, MRC, RW and LC/VC/DC/ TC, where commercial development is either 'Permitted in Principle' or 'Open for Consideration'.</p> <p>It is further highlighted that the submissions received from the OPR and EMRA welcomed the evidence-based approach that has informed the strategy in the Draft Plan and considered the existing land zoned for employment to be consistent with the RSES Guiding Principles for the Dublin Metropolitan Area and employment land and consistent with RPO 4.3.</p> <p>The subject lands at Blackchurch Business Park are located in a rural area, zoned RU, to the west of the County along the N7. As such they are non-conforming uses.</p> <p>Section 13.1.1, (vi) Non-Conforming Uses states there are instances throughout the County where land uses do not conform with the zoning objective of a site. Development which was in existence on 1<sup>st</sup> October 1964 or have a valid permission, particularly those that would intensify non-conforming uses, will be permitted only where the proposed development would not be detrimental to the amenities of the surrounding area and would accord with the principles of proper planning and sustainable development. This includes the integration of land use and transport planning.</p>
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		<p>amendments to zoning through an appropriately informed process aligning with national and regional planning policy.</p> <p><b>CE Recommendation:</b></p> <p>To insert a new objective into Policy CS5 to read:</p> <p>To ensure, that as part of the two year statutory review of the Development Plan, an evidence-based analysis of employment lands will be undertaken and should there be evidence for the need for further employment zoning within the lifetime of the Plan, a Variation to the Plan will be immediately initiated informed by:</p> <ul style="list-style-type: none"> <li>• Analysis of the type of employment need</li> <li>• Analysis of the appropriate location/s to serve such need</li> </ul> <p>Relevant National and Regional policy and proper planning and sustainable development.</p>
<p>SD-C195-130 BOC Gases</p>	<p>This submission highlights that as an Upper Tier Establishment, as defined by the Control of Major Accident Hazards (COMAH) Regulations 2015, they will continue to operate from the Bluebell site, where it is not appropriate to retail the 'REGEN' zoning for their site and lands within the SEVESO consultation zone.</p> <p>This submission goes on to state that their longstanding operation at Bluebell is now classified a 'Not Permitted' use, preventing any changes in their operation without any consideration to the financial impact on the business. Due to the significant costs of acquiring and developing a SEVESO site, it is not financially feasible to relocate. The plant is complex and not simple machinery or a 'footloose' distribution facility that can be moved elsewhere. Should they be required to relocate, most of the existing production infrastructure would be decommissioned.</p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted. It is also noted that the submission indicates that this is part of BOC's ongoing engagement on the future of the Naas Road / Ballymount (City Edge) area and that they have previously met with the team appointed by South Dublin County Council (SDCC) and Dublin City Council (DCC) to prepare the Naas Road Masterplan and with professional officers from SDCC to discuss their concerns about the impact of the proposed changes on the operation of existing businesses.</p> <p>The Draft Plan has not proposed any changes to the REGEN zoning of the site and Naas Road area which was zoned as part of a Variation to the 2016 Development Plan. It is recognised that there are existing businesses within the Naas Road Framework Plan area that do not wish to relocate. The particular issues associated with a SEVESO site such as this are acknowledged.</p>

	<p>The operation of the site was also described as 'non-conforming with the REGEN land use zoning objective' in a CEO for a recent planning application at the Bluebell site, highlighting uncertainty for a business that has operated in the area for 60 years, curtailing any potential expansion proposals that may be considered.</p> <p>Sites along the boundary of Bluebell site will encourage prospective developers to progress mixed use proposals including residential. It is requested that the Bluebell site and nearby lands revert to their longstanding zoning for 'EE'</p> <p>This submission highlights the already successful location for industrial and logistic locations stating that by retaining the Naas road as principally an industrial, enterprise and employment location would provide a more efficient use of existing infrastructure without displacing a highly successful economic engine for South Dublin.</p> <p>As Variation No. 3 (CDP 2016-2022, May 2019), this pre-dated Covid-19, there is now an opportunity to consider if this zoning remains appropriate, due to Covid-19 affecting retail, working and living patterns and demand for office and retail floor space reduced in the medium/long-term as more people work from home.</p> <p>Map attached with this submission.</p>	<p>Policy EDE26 within the Draft Plan and related EDE26 Objective 1 sets out the following:</p> <p><i>To have regard to the policy and approach of the Health and Safety Authority to the Control of Major Accident Hazards (COMAH) Risk-based Land-use Planning, HSA (2010) or any superseding documents where appropriate, in assessing planning applications and in preparing land use plans.</i></p> <p>The zoning objective for REGEN lands states:  <i>To facilitate enterprise and/or residential-led regeneration subject to a development framework or plan for the area incorporating phasing and infrastructure delivery.</i></p> <p>It is noted that Industry-Special is not permitted under the Regen zoning. Section 13.1.1, (vi) Non-Conforming Uses states there are instances throughout the County where land uses do not conform with the zoning objective of a site. Development which was in existence on 1<sup>st</sup> October 1964 or have a valid permission, particularly those that would intensify non-conforming uses, will be permitted only where the proposed development would not be detrimental to the amenities of the surrounding area and would accord with the principles of proper planning and sustainable development. This includes the integration of land use and transport planning.</p> <p>It is considered that any intensification to the uses on site would be considered on their merits having regard to Section 13.1.1 (vi) in the Draft Plan.</p> <p>A framework plan for the Naas Road area is being prepared under the CityEdge project and public consultation was undertaken in Q3/Q4 2021 to inform the framework. As indicated within the submission, consultation has also been undertaken with various landowners including BOC Gases.</p>
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SD-C195-131 NVD Limited	<p>This submission requests that the existing facility located under Runway 28 APP/TOC surfaces at Casement is rezoned EE as identified on the attached map (Land 1). It is stated that the lands have been utilised for many years as car and truck storage, located in a secure area with 2.4 metre fencing, controlled access and security monitoring.</p> <p>The need to consider appropriate types of uses from an aviation safety perspective is appreciated. Generally, the type of uses envisaged in these areas would be warehouse and storage type uses, which would not be particularly sensitive to noise and vibration impacts from the operation of airfields, or be of a type of development likely to give rise to aviation safety concerns,</p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted.</p> <p>The Draft Plan under EDE1 Objective 3 looks to ensure that there is sufficient supply of zoned and serviced lands at suitable locations to accommodate a range of enterprise and employment development types and to promote growth by strengthening the integration between employment, housing and transportation.</p> <p>Under Section 2.6.8 Employment Lands, the Draft Plan carried out an analysis of available lands which have potential to generate jobs. The purpose of this analysis was to ascertain whether sufficient employment lands are zoned to provide for the projected additional workforce for the Plan period up to 2028. Based on the analysis, there is a total capacity, excluding REGEN lands, to</p>

	<p>Development of these lands would be subject to controls of Policy IE8 for safeguarding the operations of the Aerodrome and the public, allowing for limited, no person intensive development with an Aviation Assessment to be submitted as part of any planning application to confirm the proposed use would not impact on the operation of the Irish Air Corp.</p> <p>Attached report from Airport Planning and Development LTD (APD) was considered as part of this submission.</p>	<p>develop 624 hectares to facilitate further employment. This would more than meet the projected employment growth of 18,336 jobs over the Plan period set out in section 2.6.8 of the Core Strategy in the Draft Plan.</p> <p>It is noted that the location of future employment in SDCC is not located solely within the main Objective 'EE' zoned employment lands but rather spread across a range of zoning categories including REGEN, SDZ, MRC, RW and LC/VC/DC/ TC, where commercial development is either 'Permitted in Principle' or 'Open for Consideration'.</p> <p>It is further highlighted that the submissions received from the OPR and EMRA welcomed the evidence-based approach that has informed the strategy in the Draft Plan and considered the existing land zoned for employment to be consistent with the RSES Guiding Principles for the Dublin Metropolitan Area and employment land and consistent with RPO 4.3.</p> <p>The subject lands are within the catchment of the Camac River. The catchment is currently subject to an active flood alleviation scheme and to rezone the subject site would be inappropriate and premature pending the final outcome of possible flood alleviation options at this location. The subject lands are indicated as liable to flood from the Camac in the 1 in 100 year fluvial flood event and is therefore within Flood zone A. The proposed zoning is incompatible with the level of flood risk as per OPW Guidelines. The proposed zoning can not satisfy a justification test as no need for additional EE zoning has been identified and other lands are available with lessor apparent flood risk.</p> <p>Objective CS5 Objective 4 looks to monitor and further develop the database of employment lands within the County. As set out above, the employment evidence base prepared to support the draft County Development Plan demonstrates that there is sufficient land available to support the future identified employment needs. However, the Council does recognise that trends in the</p>
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		<p>wider economy can quickly impact on employment lands, and as such the Council considers it will be important to monitor this situation and will undertake a further evidence-based analysis of employment lands in the County within two years of the Plan coming into effect. Should a need be identified for further employment zoning within the lifetime of the Plan a Variation to the Plan will be initiated informed by:</p> <ul style="list-style-type: none"> <li>• Analysis of the type of employment need</li> <li>• Analysis of the appropriate location/s to serve such need</li> <li>• Relevant National and Regional policy and proper planning and sustainable development.</li> </ul> <p>Section 13.1.1, (vi) Non-Conforming Uses states there are instances throughout the County where land uses do not conform with the zoning objective of a site. Development which were in existence on 1<sup>st</sup> October 1964 or have a valid permission, particularly those that would intensify non-conforming uses, will be permitted only where the proposed development would not be detrimental to the amenities of the surrounding area and would accord with the principles of proper planning and sustainable development. This includes the integration of land use and transport planning.</p> <p>It is considered that any intensification to the uses on site would be considered on their merits having regard to Section 13.1.1 (vi) in the Draft Plan.</p> <p>Taking the above into consideration, having regard to the proposed zoning objective, and the zoning and policies/objectives from the Draft Plan, it is considered that this proposed zoning is not appropriate at this time.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
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<p>SD-C195-131 NVD Limited</p>	<p>This submission requests that the existing facility located further from the runway threshold are rezoned EE as identified on the attached map (Land 2). These lands are not in the inner public safety zone (located in the outer public safety zone) and will be secured and will provide additional safety and security to the area under the APP/TOC surfaces.</p> <p>The need to consider appropriate types of uses from an aviation safety perspective is appreciated. Generally, the type of uses envisaged in these areas would be warehouse and storage type uses, which would not be particularly sensitive to noise and vibration impacts from the operation of airfields, or be of a type of development likely to give rise to aviation safety concerns,</p> <p>Development of these lands would be subject to controls of Policy IE8 for safeguarding the operations of the Aerodrome and the public, allowing for limited, no person intensive development with an Aviation Assessment to be submitted as part of any planning application to confirm the proposed use would not impact on the operation of the Irish Air Corp.</p> <p>Attached report from Airport Planning and Development LTD (APD) was considered as part of this submission.</p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted.</p> <p>The Draft Plan under EDE1 Objective 3 looks to ensure that there is sufficient supply of zoned and serviced lands at suitable locations to accommodate a range of enterprise and employment development types and to promote growth by strengthening the integration between employment, housing and transportation.</p> <p>Under Section 2.6.8 Employment Lands, the Draft Plan carried out an analysis of available lands which have potential to generate jobs. The purpose of this analysis was to ascertain whether sufficient employment lands are zoned to provide for the projected additional workforce for the Plan period up to 2028. Based on the analysis, there is a total capacity, excluding REGEN lands, to develop 624 hectares to facilitate further employment. This would more than meet the projected employment growth of 18,336 jobs over the Plan period set out in section 2.6.8 of the Core Strategy in the Draft Plan.</p> <p>It is noted that the location of future employment in SDCC will not be located solely within the Objective 'EE' zoned employment lands but rather spread across a range of zoning categories including REGEN, SDZ, MRC, RW and LC/VC/DC/ TC, where commercial development is either 'Permitted in Principle' or 'Open for Consideration'.</p> <p>It is further highlighted that the submissions received from the OPR and EMRA welcomed the evidence-based approach that has informed the strategy in the Draft Plan and considered the existing land zoned for employment to be consistent with the RSES Guiding Principles for the Dublin Metropolitan Area and employment land and consistent with RPO 4.3.</p> <p>The subject lands are within the catchment of the Camac River. The catchment is currently subject to an active flood alleviation scheme and to rezone the subject site would be inappropriate and</p>
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		<p>premature pending the final outcome of possible flood alleviation options at this location. The subject lands are indicated as liable to flood from the Camac in the 1 in 100 year fluvial flood event and is therefore within Flood zone A. The proposed zoning is incompatible with the level of flood risk as per OPW Guidelines. The proposed zoning cannot satisfy a justification test as no need for additional RES zoning has been identified and other lands are available with lessor apparent flood risk.</p> <p>Objective CS5 Objective 4 looks to monitor and further develop the database of employment lands within the County As set out above, the employment evidence base prepared to support the draft County Development Plan demonstrates that there is sufficient land available to support the future identified employment needs. However, the Council does recognise that trends in the wider economy can quickly impact on employment lands, and as such the Council considers it will be important to monitor this situation and will undertake a further evidence-based analysis of employment lands in the County within two years of the Plan coming into effect. Should a need be identified for further employment zoning within the lifetime of the Plan a Variation to the Plan will be initiated informed by:</p> <ul style="list-style-type: none"> <li>• Analysis of the type of employment need</li> <li>• Analysis of the appropriate location/s to serve such need</li> <li>• Relevant National and Regional policy and proper planning and sustainable development</li> </ul> <p>Section 13.1.1, (vi) Non-Conforming Uses states there are instances throughout the County where land uses do not conform with the zoning objective of a site. Development which were in existence on 1<sup>st</sup> October 1964 or have a valid permission, particularly those that would intensify non-conforming uses, will be permitted only where the proposed development would not be detrimental to the amenities of the surrounding area and would accord with the principles of proper planning and sustainable</p>
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		<p>development. This includes the integration of land use and transport planning.</p> <p>It is considered that any intensification to the uses on site would be considered on their merits having regard to Section 13.1.1 (vi) in the Draft Plan.</p> <p>Taking the above into consideration, having regard to the proposed zoning objective, and the zoning and policies/objectives from the Draft Plan, it is considered that this proposed zoning is not appropriate.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p>SD-C195-180 Paul O'Connell</p>	<p>This submission relates to lands located north of the M7 motorway, accessed off a slip road connecting the R120 to the north bound carriageway of the M7. This rezoning submission asks for the lands (map attached with submission), to be zoned EE, considering the following:</p> <ul style="list-style-type: none"> <li>- The property (Hillview), has accommodated the back-up office / support facilities for both companies since just after the date of purchase, over 20 years ago.</li> <li>- Commercial rates are paid on the property since 2004;</li> <li>- The RU zoning currently on the property is out of date, due to the commercial nature of the long-established use.</li> <li>- Illogical that the site continues to be treated in isolation under the Draft CDP as RU, with many neighbouring properties remain as EE.</li> </ul>	<p><b>CE Response:</b></p> <p>The request to rezone is noted.</p> <p>The subject site is located opposite the Avoca premises on the N7, to the east of Commercials Club and although appearing to be a residential premises from the front view along the N7/R120 slip road eastbound, is stated to be in commercial use. As pointed out in the submission, EE zoning extends to the neighbouring property to the east as part of Baldonnell/Moneenalion industrial area.</p> <p>The Draft Plan under EDE1 Objective 3 looks to ensure that there is sufficient supply of zoned and serviced lands at suitable locations to accommodate a range of enterprise and employment development types and to promote growth by strengthening the integration between employment, housing and transportation.</p> <p>Under Section 2.6.8 Employment Lands, the Draft Plan carried out an analysis of available lands which have potential to generate jobs. The purpose of this analysis was to ascertain whether sufficient employment lands are zoned to provide for the projected additional workforce for the Plan period up to 2028. Based on the analysis, there is a total capacity, excluding REGEN lands, to</p>



		<p>develop 624 hectares to facilitate further employment. This would more than meet the projected employment growth of 18,336 jobs over the Plan period set out in section 2.6.8 of the Core Strategy in the Draft Plan.</p> <p>It is noted that the location of future employment in SDCC will not be located solely within the Objective 'EE' zoned employment lands but rather spread across a range of zoning categories including REGEN, SDZ, MRC, RW and LC/VC/DC/ TC, where commercial development is either 'Permitted in Principle' or 'Open for Consideration'.</p> <p>It is further highlighted that the submissions received from the OPR and EMRA welcomed the evidence-based approach that has informed the strategy in the Draft Plan and considered the existing land zoned for employment to be consistent with the RSES Guiding Principles for the Dublin Metropolitan Area and employment land and consistent with RPO 4.3.</p> <p>It is noted that the lands are located fronting onto a merging lane with the N7 and do not currently appear to have separate access albeit this would be subject to more detailed planning should the issue arise.</p> <p>The subject lands are within the catchment of the Camac River. The catchment is currently subject to an active flood alleviation scheme and to rezone the subject site would be inappropriate and premature pending the final outcome of possible flood alleviation options at this location. The subject lands are indicated as liable to flood from the Camac in the 1 in 100 year fluvial flood event and is therefore within Flood zone A. The proposed zoning is incompatible with the level of flood risk as per OPW Guidelines. The proposed zoning can not satisfy a justification test as no need for additional RES zoning has been identified and other lands are available with lessor apparent flood risk.</p>
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		<p>Objective CS5 Objective 4 looks to monitor and further develop the database of employment lands within the County. As set out above, the employment evidence base prepared to support the draft County Development Plan demonstrates that there is sufficient land available to support the future identified employment needs. However, the Council does recognise that trends in the wider economy can quickly impact on employment lands, and as such the Council considers it will be important to monitor this situation and will undertake a further evidence-based analysis of employment lands in the County within two years of the Plan coming into effect. Should a need be identified for further employment zoning within the lifetime of the Plan a Variation to the Plan will be initiated informed by:</p> <ul style="list-style-type: none"> <li>• Analysis of the type of employment need</li> <li>• Analysis of the appropriate location/s to serve such need</li> <li>• Relevant National and Regional policy and proper planning and sustainable development.</li> </ul> <p>Taking the above into consideration it is considered that this proposed zoning is not appropriate at this time.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p>SD-C195-222 Tallaght Community Council</p>	<p>Submission indicates that a detailed zoning and mix of specified land uses instead of the broad "mixed use" or "regeneration" is required. Industrial and employment generating land uses need to be clearly outlined to prompt wider enterprise land uses into Central Tallaght areas.</p>	<p><b>CE Response:</b></p> <p>The Draft Plan sets out zoning objectives for all of the lands within the County with specified land use types identified as permitted in principle, open for consideration or not permitted. The most common types of land use are therefore covered within the zoning objective tables. It would not be feasible to include all possible land uses that could be provided for in every area of the County in detail and it is considered that the zoning objectives are clearly understood by prospective enterprise users and have worked well.</p>

		<p>The lands in Tallaght have the zonings Town Centre, Regeneration and Village Centre. These zonings provide for mixed use at a scale appropriate to their context having regard to the uses set out in the zoning tables.</p> <p>It is considered that the strategic nature of the relevant zoning objectives in the Development Plan is appropriate and provides for the types of uses which can be accommodated, for clarity to prospective applicants and for development management implementation.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p>SD-C195-177 JMC Vans Trans Limited</p>	<p>Submission relates to lands located at Kingswood Business Park, Baldonnell, Dublin 22 (west of Casement Aerodrome and to the south of Grange Castle Business Park). The purpose of this submission is for the rezoning of a small portion of lands, adjacent to the EE zoning at Kingswood, which is currently zoned 'OS' (highlighted on map).</p> <p>The submission states that the lands zoned 'OS' are strategically positioned to provide for an urgently needed requirement for additional HGV parking on site to deal with increasing business demands since the Covid-19 pandemic. It is stated that the rezoning of these lands will form a natural extension to the existing site where the existing lands are scrubland directly adjacent an industrial facility.</p> <p>submission makes the point that without rezoning of this small portion of lands to facilitate the required expansion of their business and their associated truck parking requirements, the owners of the land will be placed in a very difficult position with the operation of their business as it is not viable for them to secure another site regarding appropriate zoning, avoiding sites in close proximity to</p>	<p><b>CE Response:</b></p> <p>The request for rezoning is noted.</p> <p>The submission requests that a triangular area of 0.485ha to the northwest of the site, within the wider boundary of the site, currently zoned OS is rezoned to EE. It is noted that the area of the site currently zoned EE was shaped by the Approach/ Take Off Climb Surfaces of Casement Aerodrome cutting the remaining triangle of the original field off.</p> <p>Having regard to the restrictions associated with the above, the area proposed for rezoning falls within a location in which developments of up to 15m in height above ground are unlikely to have significance in relation to Aviation.</p> <p>While it is suggested that the proposed use would be as a turning circle and HGV parking, the proposed EE zoning would not restrict the site to such use. However, proposed uses would be subject to a planning application at which time a full assessment of the impact on the safety and operation of the aerodrome and of people on the ground, will be carried out in consultation with the relevant airport bodies.</p>

	<p>residential areas, easily accessible lands and the significant investment that has been provided at the subject site to date.</p> <p>Submission highlights evidence from recent research of the industrial and logistics market, where there is a trend for continuing demand for industrial floorplates of appropriate scales must continue due to Covid-19 and Brexit. They go on to state that by rezoning lands from OS to EE in the Draft CDP is in the interest of proper planning and sustainable development and will allow for the extension of an important and highly functioning existing logistical business.</p>	<p>However, the site has been assessed under the strategic flood risk for the County Development Plan and it has been found that a portion of the lands are identified as liable to flood from adjacent watercourse. The proposed zoning is incompatible with the level of flood risk as per OPW Guidelines. Zoning of lands liable to flood should be avoided as per the sequential approach to flood risk management (OPW Guidelines).</p> <p>Having regard to the assessment on flood risk and the sequential approach to development and associated justification test for new zoning, it is considered that it is not appropriate to rezone the lands at this time.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan</p>
<p>SD-C195-76 Donal &amp; Miriam Griffin</p>	<p>Submission relates to lands at Griffin Allotments, located on the road between Newcastle to Grange Castle at Castlebaggot, Newcastle, Co Dublin on the Southeast of the Aylmer Road, for the purposes of rezoning the lands from RU to EE. The site in question consists of 6.8 Ha.</p> <p>The submission states that policies within the National Planning Framework (NPF), Regional Spatial and Economic Strategy (RSES), Development Plan Guidelines for Planning Authorities Draft 2021 and the Draft South Dublin County Development Plan 2022-2028, supports the rezoning of the site.</p> <p>Submission states that the self-sustaining growth town of Newcastle is not affected by the proposed rezoning, stating that the rezoning consolidates lands adjoining the Grange Castle core, utilises an existing employment area, consistent with the proper planning and sustainable development of the area and complies with the strategy approach of phasing and</p>	<p><b>CE Response:</b></p> <p>The content of the submission is noted.</p> <p>It is noted that part of the lands are also subject to a separate submission to rezone to EE.</p> <p>The Draft Plan under EDE1 Objective 3 looks to ensure that there is sufficient supply of zoned and serviced lands at suitable locations to accommodate a range of enterprise and employment development types and to promote growth by strengthening the integration between employment, housing and transportation.</p> <p>Under Section 2.6.8 Employment Lands, the Draft Plan carried out an analysis of available lands which have potential to generate jobs. The purpose of this analysis was to ascertain whether sufficient employment lands are zoned to provide for the projected additional workforce for the Plan period up to 2028. Based on the analysis, there is a total capacity, excluding REGEN lands, to develop 624 hectares to facilitate further employment. This would more than meet the projected employment growth of 18,336 jobs</p>

	<p>sequential approach of zoning lands near the existing commercial core.</p> <p>Submission also believes the rezoning consolidates clustering initiatives that create, maintain, or upgrade an economic stronghold by strengthening linkages or facilitating collective action to improve the cluster specific business environment, while supporting Policy EDE1, EDE4 Objective 1 and EDE4 Objective 3. Adjacent Grange Castle lands will support significant infrastructural investment in the development of the area.</p>	<p>over the Plan period set out in section 2.6.8 of the Core Strategy in the Draft Plan.</p> <p>The location of future employment needs in SDCC is not reliant solely on the Objective 'EE' zoned employment lands but rather spread across a range of zoning categories including REGEN, SDZ, MRC, RW and LC/VC/DC/ TC, where commercial development is either 'Permitted in Principle' or 'Open for Consideration'.</p> <p>It is further highlighted that the submissions received from the OPR and EMRA welcomed the evidence-based approach that has informed the strategy in the Draft Plan and considered the existing land zoned for employment to be consistent with the RSES Guiding Principles for the Dublin Metropolitan Area and employment land and consistent with RPO 4.3.</p> <p>Objective CS5 Objective 4 sets out the commitment to monitor and further develop the database of employment lands within the County. As set out above, the employment evidence base prepared to support the draft County Development Plan demonstrates that there is sufficient land available to support the future identified employment needs. However, the Council does recognise that trends in the wider economy can quickly impact on employment lands, and as such the Council considers it will be important to monitor this situation and will undertake a further evidence-based analysis of employment lands in the County within two years of the Plan coming into effect. Should a need be identified for further employment zoning within the lifetime of the Plan a Variation to the Plan will be initiated informed by:</p> <ul style="list-style-type: none"> <li>• Analysis of the type of employment need</li> <li>• Analysis of the appropriate location/s to serve such need</li> <li>• Relevant National and Regional policy and proper planning and sustainable development.</li> </ul>
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		<p>Taking the above into consideration it is considered that the zoning should remain as is in the Draft Plan but that a new objective should be inserted into the Plan reflecting the need to continue to monitor the capacity of employment lands and to make amendments to zoning through an appropriately informed process aligning with national and regional planning policy.</p> <p><b>CE Recommendation:</b></p> <p>To insert a <b>new objective into Policy CS5</b> to read:</p> <p><b>To ensure, that as part of the two year statutory review of the Development Plan, an evidence-based analysis of employment lands will be undertaken and should there be evidence for the need for further employment zoning within the lifetime of the Plan, a Variation to the Plan will be immediately initiated informed by:</b></p> <ul style="list-style-type: none"> <li>• <b>Analysis of the type of employment need</b></li> <li>• <b>Analysis of the appropriate location/s to serve such need</b></li> <li>• <b>Relevant National and Regional policy and proper planning and sustainable development.</b></li> </ul>
<p><a href="#">SD-C195-79 Moffash Ltd</a></p>	<p>This submission relates to approximately 6.5 ha. located to the immediate south of Profile Park, Grange Castle, Clondalkin, Dublin 22, and sets out the need to extend Profile Park to the south so that it does not form an isolated land use zoning and can integrate with other EE zoned lands to the north and west, as well as enabling a strategic pedestrian/cycle link with the Baldonnell Road.</p> <p>The employment zoning and future development of the site in Profile Park will contribute to the creation of a stronger, connected, sustainable and vibrant employment area that is already serviced with existing infrastructure and well served by public transport.</p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted.</p> <p>The Draft Plan under EDE1 Objective 3 looks to ensure that there is sufficient supply of zoned and serviced lands at suitable locations to accommodate a range of enterprise and employment development types and to promote growth by strengthening the integration between employment, housing and transportation.</p> <p>Under Section 2.6.8 Employment Lands, the Draft Plan carried out an analysis of available lands which have potential to generate jobs. The purpose of this analysis was to ascertain whether sufficient employment lands are zoned to provide for the projected</p>

	<p>The following points are made in relation to the site looking for rezoning:</p> <ul style="list-style-type: none"> <li>- Availability of zoned land not in the ownership and control of the County Council:</li> </ul> <p>Submission states that EE zoned land in Grange Castle is primarily within control of the County Council which has the potential to influence the market in terms of Irish and International inward investment, also having the potential to manage development in a manner that is not attractive to certain developers. It is put forward that Profile Park offers an excellent location to businesses and has resulted in Google acquiring a large section of the Park.</p> <p>A further point is made in relation to lack of availability of EE zoned land elsewhere in the County, which is serviced by infrastructure and served by public transport. Reference is made to a CBRE Report.</p> <ul style="list-style-type: none"> <li>- Inappropriate Approach to the Zoning of lands within the Draft County Development Plan:</li> </ul> <p>Submission states that contrary to the principles of National and Regional planning policy, the Draft CDP does not identify appropriate zonings for these strategic lands in close proximity and surrounded by other EE zoned lands. They claim that the 6.4ha site would not impact on the ability to develop 554ha. of land zoned for EE under the Draft Plan but provide a logical extension, containing infrastructure to facilitate employment and aligning with Policy CS5 of the Draft CDP.</p> <ul style="list-style-type: none"> <li>- Rationale for considering lands for EE Zoning</li> </ul> <p>Submission recommends that their clients lands should be rezoned EE to be developed in accordance with a set of key objectives that would include:</p>	<p>additional workforce for the Plan period up to 2028. Based on the analysis, there is a total capacity, excluding REGEN lands, to develop 624 hectares to facilitate further employment. This would more than meet the projected employment growth of 18,336 jobs over the Plan period set out in section 2.6.8 of the Core Strategy in the Draft Plan.</p> <p>The location of future employment needs in SDCC is not reliant solely on the Objective 'EE' zoned employment lands but rather spread across a range of zoning categories including REGEN, SDZ, MRC, RW and LC/VC/DC/ TC, where commercial development is either 'Permitted in Principle' or 'Open for Consideration'.</p> <p>It is further highlighted that the submissions received from the OPR and EMRA welcomed the evidence-based approach that has informed the strategy in the Draft Plan and considered the existing land zoned for employment to be consistent with the RSES Guiding Principles for the Dublin Metropolitan Area and employment land and consistent with RPO 4.3.</p> <p>The site in question, while immediately adjacent to the southern boundary of Profile Park, is also located next to a number of Sites and Monuments Record Zone of Notification, a record of protected structures and two sites and monuments record. Section 13.2.5 Archaeological Heritage states there is a presumption in favour of in-situ preservation of archaeological sites and monuments and avoidance of developmental impacts on archaeological heritage.</p> <p>Objective CS5 Objective 4 sets out the commitment to monitor and further develop the database of employment lands within the County As set out above, the employment evidence base prepared to support the draft County Development Plan demonstrates that there is sufficient land available to support the future identified employment needs. However, the Council does recognise that trends in the wider economy can quickly impact on employment lands, and as such the Council considers it will be important to</p>
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	<p>1. Development to occur in a manner that respects the national monuments and protected structure on site; and</p> <p>2. A pedestrian and cycling link to be created from Profile Park to the Baldonnell Road.</p> <p>- Strategic planning policy that supports the review of the zonings under the Draft CDP</p>	<p>monitor this situation and will undertake a further evidence-based analysis of employment lands in the County within two years of the Plan coming into effect. Should a need be identified for further employment zoning within the lifetime of the Plan a Variation to the Plan will be initiated informed by:</p> <ul style="list-style-type: none"> <li>• Analysis of the type of employment need</li> <li>• Analysis of the appropriate location/s to serve such need</li> <li>• Relevant National and Regional policy and proper planning and sustainable development.</li> </ul> <p>Taking the above into consideration it is considered that the zoning should remain as is in the Draft Plan but that a new objective should be inserted into the Plan reflecting the need to continue to monitor the capacity of employment lands and to make amendments to zoning through an appropriately informed process aligning with national and regional planning policy.</p> <p><b>CE Recommendation:</b></p> <p>To insert a new objective into <b>Policy CS5</b> to read:</p> <p><b>To ensure, that as part of the two year statutory review of the Development Plan, an evidence-based analysis of employment lands will be undertaken and should there be evidence for the need for further employment zoning within the lifetime of the Plan, a Variation to the Plan will be immediately initiated informed by:</b></p> <ul style="list-style-type: none"> <li>• <b>Analysis of the type of employment need</b></li> <li>• <b>Analysis of the appropriate location/s to serve such need</b></li> <li>• <b>Relevant National and Regional policy and proper planning and sustainable development.</b></li> </ul>
SD-C195-80 Moffash Ltd	Submission relates to approximately 1.3 ha. and 20.6 ha. sites, located to the immediate south and south-west of Baldonnell road, for the purpose of rezoning the RU lands to	<p><b>CE Response:</b></p> <p>The contents of the submission are noted.</p>



	<p>EE so that it does not form an isolated land use zoning and can integrate with other EE zoned lands to the north and west. There is a legal option to purchase the larger 21.6 ha. site.</p> <p>The following points are made in relation to the site looking for rezoning:</p> <p><b>- Location of our clients lands:</b></p> <p>Submission states, with regards to the 1.3 ha. site, that given surrounding zoning and land use to the north and west, and ownership, there is no planning basis for these lands to protect and improve rural amenity and to provide for agriculture. There are a number of archaeological features on both lands which are referenced in the submission.</p> <p><b>- Availability of zoned land not in the ownership and control of the County Council:</b></p> <p>Submission states that EE zoned land in Grange Castle is primarily within control of the County Council which has the potential to influence the market in terms of Irish and International inward investment, also having the potential to manage development in a manner that is not attractive to certain developers. Point made that both sites can provide a land use link between the Amazon zoned lands and the EE zoned lands to its north.</p> <p>A further point is made in relation to lack of availability of EE zoned land elsewhere in the County, which is serviced by infrastructure and served by public transport.</p> <p>CBRE report is attached discussing observations on Supply and Demand of Industrial &amp; Logistics Accommodating in South Dublin County Council Area, which was read in collaboration with this submission.</p>	<p>The Draft Plan under EDE1 Objective 3 looks to ensure that there is sufficient supply of zoned and serviced lands at suitable locations to accommodate a range of enterprise and employment development types and to promote growth by strengthening the integration between employment, housing and transportation.</p> <p>Under Section 2.6.8 Employment Lands, the Draft Plan carried out an analysis of available lands which have potential to generate jobs. The purpose of this analysis was to ascertain whether sufficient employment lands are zoned to provide for the projected additional workforce for the Plan period up to 2028. Based on the analysis, there is a total capacity, excluding REGEN lands, to develop 624 hectares to facilitate further employment. This would more than meet the projected employment growth of 18,336 jobs over the Plan period set out in section 2.6.8 of the Core Strategy in the Draft Plan.</p> <p>The location of future employment needs in SDCC is not reliant solely on the Objective 'EE' zoned employment lands but rather spread across a range of zoning categories including REGEN, SDZ, MRC, RW and LC/VC/DC/ TC, where commercial development is either 'Permitted in Principle' or 'Open for Consideration'.</p> <p>The submissions received from the OPR and EMRA welcomed the evidence-based approach that has informed the strategy in the Draft Plan and considered the existing land zoned for employment to be consistent with the RSES Guiding Principles for the Dublin Metropolitan Area and employment land and consistent with RPO 4.3.</p> <p>It is noted that the smaller parcel of land 1.3ha is owned by Moffash and is bordered by EE zoned land to the north and west while the larger parcel, further to the south and west, has options to buy and is also in part, subject to a separate submission for rezoning to EE. The neighbouring site beside both plots of land referenced in this submission is also located next to a number of</p>
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	<p><b>- Inappropriate Approach to the Zoning of lands within the Draft County Development Plan:</b></p> <p>Submission states that contrary to the principles of National and Regional planning policy, the Draft CDP does not identify appropriate zonings for these strategic lands in close proximity and surrounded by other EE zoned lands. The larger site would provide a natural fill between the Amazon zoned lands to the west and the Profile Park lands to the east.</p> <p>The submission states the Core Strategy highlights Grange Castle, including the lands and options lands, is an employment area within the Dublin MASP, with both sites available for development subject to necessary infrastructure to be able to facilitate employment uses immediately.</p> <p>They claim that both sites would not impact on the ability to develop 554ha. of land zoned for EE under the Draft Plan but provide a logical extension.</p> <p><b>- Rationale for considering lands for EE Zoning?</b></p> <p>Submission recommends that their clients lands should be rezoned EE, as it does not reflect correctly the geographical location and where larger tracts of land are zoned EE and in the ownership of the County Council on land significantly further west.</p> <p><b>- Strategic planning policy that supports the review of the zonings under the Draft CDP</b></p> <p>Submission believes their land is located within the Dublin MASP area and offers an opportunity to widen the nature and form of EE zoned lands in the county. The proposed rezoning of both sites and its change from RU to EE fully conforms with this strategic objective of the RSES.</p>	<p>Sites and Monuments Record Zone of Notification, a record of protected structures and two sites and monuments record. Section 13.2.5 Archaeological Heritage states there is a presumption in favour of in-situ preservation of archaeological sites and monuments and avoidance of developmental impacts on archaeological heritage.</p> <p>Objective CS5 Objective 4 sets out the commitment to monitor and further develop the database of employment lands within the County. As set out above, the employment evidence base prepared to support the draft County Development Plan demonstrates that there is sufficient land available to support the future identified employment needs. However, the Council does recognise that trends in the wider economy can quickly impact on employment lands, and as such the Council considers it will be important to monitor this situation and will undertake a further evidence-based analysis of employment lands in the County within two years of the Plan coming into effect. Should a need be identified for further employment zoning within the lifetime of the Plan a Variation to the Plan will be initiated informed by:</p> <ul style="list-style-type: none"> <li>• Analysis of the type of employment need</li> <li>• Analysis of the appropriate location/s to serve such need</li> <li>• Relevant National and Regional policy and proper planning and sustainable development.</li> </ul> <p>Taking the above into consideration it is considered that the zoning should remain as is in the Draft Plan but that a new objective should be inserted into the Plan reflecting the need to continue to monitor the capacity of employment lands and to make amendments to zoning through an appropriately informed process aligning with national and regional planning policy.</p> <p><b>CE Recommendation:</b></p> <p>To insert a <b>new objective into Policy CS5</b> to read:</p>
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	<p>Submission goes on to state that in accordance with National Policy Objective 11, Regional Policy Objective 5.3 and having regard to the strong planning rationale and directing development towards areas that are sequentially located to existing development, from a land use planning perspective it is appropriate to rezone these lands from RU to EE.</p>	<p><b>To ensure, that as part of the two year statutory review of the Development Plan, an evidence-based analysis of employment lands will be undertaken and should there be evidence for the need for further employment zoning within the lifetime of the Plan, a Variation to the Plan will be immediately initiated informed by:</b></p> <ul style="list-style-type: none"> <li>• <b>Analysis of the type of employment need</b></li> <li>• <b>Analysis of the appropriate location/s to serve such need</b></li> <li>• <b>Relevant National and Regional policy and proper planning and sustainable development.</b></li> </ul>
<p><a href="#">SD-C195-197 John and Barry Gargan</a></p>	<p>Submission relates to approx 216 acres located south of Newcastle town and north of Rathcoole in South Dublin County which are mainly in agricultural use. The purpose of this submission is to rezone the RU lands to EE as the subject lands are stated to represent the optimal location for a natural extension of South Dublin's EE land bank.</p> <p>The strategic location of the site, accessed from Tay Lane, between the settlements of Rathcoole and Newcastle is highlighted, and is said to represent an appropriate location to provide long-term employment opportunities for the local population.</p> <p>It is submitted that the lands are better utilised as 'EE' due to the growing population of Newcastle and Rathcoole, to reinforce and expand on the success of surrounding business parks in providing high quality employment opportunities for the area. It is also put forward that the lands would be suitable for an existing green recycling business to the east to facilitate redevelopment of that land. The expansion of 'EE' lands identified in this submission is said to represent a natural expansion of zoned lands to facilitate future demand.</p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted.</p> <p>The proposed lands for rezoning represent a large land parcel which it is stated are currently in agricultural use. It is noted that this is one of a number of submissions in this area north of the N7 and opposite Rathcoole for rezoning.</p> <p>The Draft Plan under EDE1 Objective 3 looks to ensure that there is sufficient supply of zoned and serviced lands at suitable locations to accommodate a range of enterprise and employment development types and to promote growth by strengthening the integration between employment, housing and transportation.</p> <p>Under Section 2.6.8 Employment Lands, the Draft Plan carried out an analysis of available lands which have potential to generate jobs. The purpose of this analysis was to ascertain whether sufficient employment lands are zoned to provide for the projected additional workforce for the Plan period up to 2028. Based on the analysis, there is a total capacity, excluding REGEN lands, to develop 624 hectares to facilitate further employment. This would more than meet the projected employment growth of 18,336 jobs</p>

		<p>over the Plan period set out in section 2.6.8 of the Core Strategy in the Draft Plan.</p> <p>The location of future employment needs in SDCC is not reliant solely on the Objective 'EE' zoned employment lands but rather spread across a range of zoning categories including REGEN, SDZ, MRC, RW and LC/VC/DC/ TC, where commercial development is either 'Permitted in Principle' or 'Open for Consideration'.</p> <p>The submissions received from the OPR and EMRA welcomed the evidence-based approach that has informed the strategy in the Draft Plan and considered the existing land zoned for employment to be consistent with the RSES Guiding Principles for the Dublin Metropolitan Area and employment land and consistent with RPO 4.3.</p> <p>The proposed rezoning would represent a significant westward expansion of currently zoned land and an associated infringement into rural zoned land in use as agriculture. The need for an expansion westward has not been demonstrated and at this time is considered to represent ad hoc zoning and unacceptable urban sprawl.</p> <p>Objective CS5 Objective 4 sets out the commitment to monitor and further develop the database of employment lands within the County. As set out above, the employment evidence base prepared to support the draft County Development Plan demonstrates that there is sufficient land available to support the future identified employment needs. However, the Council does recognise that trends in the wider economy can quickly impact on employment lands, and as such the Council considers it will be important to monitor this situation and will undertake a further evidence-based analysis of employment lands in the County within two years of the Plan coming into effect. Should a need be</p>
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		<p>identified for further employment zoning within the lifetime of the Plan a Variation to the Plan will be initiated informed by:</p> <p>Analysis of the type of employment need</p> <p>Analysis of the appropriate location/s to serve such need</p> <p>Relevant National and Regional policy and proper planning and sustainable development.</p> <p>Taking the above into consideration it is considered that the zoning should remain as is in the Draft Plan but that a new objective should be inserted into the Plan reflecting the need to continue to monitor the capacity of employment lands and to make amendments to zoning through an appropriately informed process aligning with national and regional planning policy.</p> <p><b>CE Recommendation:</b></p> <p>To insert a <b>new objective into Policy CS5</b> to read:</p> <p><b>To ensure, that as part of the two-year statutory review of the Development Plan, an evidence-based analysis of employment lands will be undertaken and should there be evidence for the need for further employment zoning within the lifetime of the Plan, a Variation to the Plan will be immediately initiated informed by:</b></p> <ul style="list-style-type: none"> <li>• <b>Analysis of the type of employment need</b></li> <li>• <b>Analysis of the appropriate location/s to serve such need</b></li> <li>• <b>Relevant National and Regional policy and proper planning and sustainable development.</b></li> </ul>
<p><a href="#">SD-C195-121 tony bamford planning</a></p>	<p>Submission relates to lands at Tara Co-op on the R148 (Leixlip Road), at Junction 5 of the M4, Co. Dublin. The submission has split the site in two and looks for the following amendments to the plan:</p>	<p><b>CE Response:</b></p> <p>The issues raised in the submission are noted.</p>

	<p><b>- Proposed Zoning - Subject Lands 1A:</b></p> <p>Submission requests that lands 1A should be zoned 'RU', as these lands are part of the wider triangle of land to the west of Cooldrinagh Lane which have already absorbed substantive development.</p> <p>Within the attached Landscape Assessment which was attached with the submission, it should be considered that the wider lands to the west of Cooldrinagh Lane and south of Leixlip Road should also be rezoned 'RU' as this area forms part of the Urban LCA.</p> <p><b>- Proposed Zoning - Subject Lands 1B:</b></p> <p>Submission requests that lands 1B should be zoned 'EE', taking account of the development already on the majority of the lands, with access to the land to the immediate east, only available through the Tara Co-op lands.</p> <p>The submission goes on to state that if this zoning is implemented on these lands, it would recognise the fact the site is already developed and in active use, while also recognising the fact the lands are no longer in the Liffey Valley LCA and are now classed urban.</p> <p><b>- Special Local Objective (SLO):</b></p> <p>Submission looks for the reintroduction of an SLO to the entirety of Lands 1B as follows:</p> <p><i>'To facilitate the redevelopment and regeneration of the site of the former Tara Co-op and adjoining lands to its east with a replacement development of a scale, design and layout appropriate to its prominent location <b>close to the Liffey Valley 'HA-LV' and in proximity to the M4 and the Lucan/Leixlip urban areas. Any such development shall be subject to an environmental management plan in relation to remediation of any contaminated land and should not compromise the</b></i></p>	<p>The subject lands extend to stated 7.54 hectares and lie to the north of the N/M4 between Cooldrinagh Lane and the Leixlip/Celbridge junction of the N4. They consist of agricultural land to the east and west and the brownfield premises of the old Tara Co-Op in the centre fronting on to the old Leixlip-Lucan Road. The proposal is to rezone sites identified as 1A and 1B. Site 1B contains the Co-Op brownfield lands and a portion of agricultural lands to the east and rezoning from HA-LV to EE is sought. Site 1A is to the west between the Co-Op and Cooldrinagh Lane and rezoning from HA-LV to RU is sought. An amendment to the SLO on the current 2016 Plan, which was not brought forward to the Draft Plan, is sought on site 1B if it is not rezoned.</p> <p>The Draft Plan under EDE1 Objective 3 looks to ensure that there is sufficient supply of zoned and serviced lands at suitable locations to accommodate a range of enterprise and employment development types and to promote growth by strengthening the integration between employment, housing and transportation.</p> <p>Under Section 2.6.8 Employment Lands, the Draft Plan carried out an analysis of available lands which have potential to generate jobs. The purpose of this analysis was to ascertain whether sufficient employment lands are zoned to provide for the projected additional workforce for the Plan period up to 2028. Based on the analysis, there is a total capacity, excluding REGEN lands, to develop 624 hectares to facilitate further employment. This would more than meet the projected employment growth of 18,336 jobs over the Plan period set out in section 2.6.8 of the Core Strategy in the Draft Plan.</p> <p>The location of future employment needs in SDCC is not reliant solely on the Objective 'EE' zoned employment lands but rather spread across a range of zoning categories including REGEN, SDZ, MRC, RW and LC/VC/DC/ TC, where commercial development is either 'Permitted in Principle' or 'Open for Consideration'.</p>
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	<p><i>important geomorphic and archaeological heritage of the site, and adjacent sites. Additionally, it should not compromise the vistas or landscape amenity or biodiversity of the Liffey Valley.'</i></p> <p>This SLO may only be required where SDCC does not consider it appropriate to rezone the subject lands.</p> <p>Attached with this submission are a review of Engineering Services and a Landscape and Visual Analysis which have been considered as part of this submission.</p>	<p>The submissions received from the OPR and EMRA welcomed the evidence-based approach that has informed the strategy in the Draft Plan and considered the existing land zoned for employment to be consistent with the RSES Guiding Principles for the Dublin Metropolitan Area and employment land and consistent with RPO 4.3.</p> <p>Objective CS5 Objective 4 sets out the commitment to monitor and further develop the database of employment lands within the County. As set out above, the employment evidence base prepared to support the draft County Development Plan demonstrates that there is sufficient land available to support the future identified employment needs. However, the Council does recognise that trends in the wider economy can quickly impact on employment lands, and as such the Council considers it will be important to monitor this situation and will undertake a further evidence-based analysis of employment lands in the County within two years of the Plan coming into effect. Should a need be identified for further employment zoning within the lifetime of the Plan a Variation to the Plan will be initiated informed by:</p> <ul style="list-style-type: none"> <li>• Analysis of the type of employment need</li> <li>• Analysis of the appropriate location/s to serve such need</li> <li>• Relevant National and Regional policy and proper planning and sustainable development.</li> </ul> <p>It is recognised that there are existing uses on a portion of the larger site proposed for rezoning. However, having regard to the fact that there is currently sufficient zoned land to serve the County, to the largely greenfield nature of the lands and to its location along a heavily used junction on the N4 National Road, it is not considered appropriate to rezone the lands at this time. The indication that the lands are not included in the Liffey Valley Landscape Character Area and are identified in the landscape character area described as 'Urban' is correct. However, to rezone the lands from HA-LV to either EE (in part) or RU, with RU seen by the submitter as a type of interim zoning, or to apply a new SLO, is</p>
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		<p>not appropriate until a wider study based on identified need, as per the recommendation below, is undertaken.</p> <p><b>CE Recommendation:</b></p> <p>To insert a <b>new objective into Policy CS5</b> to read:</p> <p><b>To ensure, that as part of the two year statutory review of the Development Plan, an evidence-based analysis of employment lands will be undertaken and should there be evidence for the need for further employment zoning within the lifetime of the Plan, a Variation to the Plan will be immediately initiated informed by:</b></p> <ul style="list-style-type: none"> <li>• <b>Analysis of the type of employment need</b></li> <li>• <b>Analysis of the appropriate location/s to serve such need</b></li> <li>• <b>Relevant National and Regional policy and proper planning and sustainable development.</b></li> </ul>
<p><b>SD-C195-169 Greenogue Management</b></p>	<p>Submission relates to lands located north and east of the Greenogue and Aerodrome Business Park, Rathcoole, Co. Dublin, for rezoning of lands from RU to EE on approx. 52 ha. to allow for the much needed expansion of the Greenogue and Aerodrome Business Parks for the development of high quality industrial and logistics warehousing.</p> <p>The submission has noted the Department of Defence Inner Zone and the Department of Defence Security Zone are proposed to be removed as part of the Draft Plan. Notwithstanding that, this Submission sets out that the rezoning of the land to accommodate future industrial development is acceptable having regard to aviation safety.</p> <p>Submission research indicates growing demand for modern industrial and logistics facilities in the south west Dublin area, with the need to consider the 3 key typologies of Industrial users (traditional, Foreign Direct Investment (FDI/Data Centre</p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted.</p> <p>The Draft Plan under EDE1 Objective 3 looks to ensure that there is sufficient supply of zoned and serviced lands at suitable locations to accommodate a range of enterprise and employment development types and to promote growth by strengthening the integration between employment, housing and transportation.</p> <p>Under Section 2.6.8 Employment Lands, the Draft Plan carried out an analysis of available lands which have potential to generate jobs. The purpose of this analysis was to ascertain whether sufficient employment lands are zoned to provide for the projected additional workforce for the Plan period up to 2028. Based on the analysis, there is a total capacity, excluding REGEN lands, to develop 624 hectares to facilitate further employment. This would more than meet the projected employment growth of 18,336 jobs</p>



	<p>and Campus Style Office), as the future growth of traditional users is currently not being catered for in the zoning.</p> <p>The submission research paper prepared by JLL sets out that there is insufficient lands zoned EE for the 'traditional user', which will lead to the movement of these businesses outside the county to obtain appropriate lands for industrial development. This is highlighted by the expected displacement of businesses on REGEN lands to the Greenogue and Aerodrome Business Parks within the Draft CDP, therefore it should be considered that sufficient land is not available to allow this to happen at present.</p> <p>Submission affirms that rezoning of the lands presents a logical solution, reinforcing a vibrant and expanding Business Park, playing a key role in providing the urgently needed additional lands for the 'traditional user'.</p> <p>Submission also included the following documents which were considered for the CE response and recommendation:</p> <ul style="list-style-type: none"> <li>- Landscape Masterplan (Prepared by JBA Consulting)</li> <li>- Aerodrome Safety Assessment (Prepared by Airport Planning and Development Ltd)</li> <li>- Wind shear and Turbulence Analysis (Prepared by B-Fluid Limited)</li> <li>- Masterplanning and Strategic Review of Flood Risk (Prepared by JBA Consultants)</li> <li>- Review of Enterprise and Employment Zoned Lands in South County Council (SDCC) area (Prepared by JLL)</li> </ul> <p>Each of the above assessments conclude that there is no technical reason that the subject lands cannot be developed for industrial use as reported in the submission.</p>	<p>over the Plan period set out in section 2.6.8 of the Core Strategy in the Draft Plan.</p> <p>The location of future employment needs in SDCC is not reliant solely on the Objective 'EE' zoned employment lands but rather spread across a range of zoning categories including REGEN, SDZ, MRC, RW and LC/VC/DC/ TC, where commercial development is either 'Permitted in Principle' or 'Open for Consideration'.</p> <p>The submissions received from the OPR and EMRA welcomed the evidence-based approach that has informed the strategy in the Draft Plan and considered the existing land zoned for employment to be consistent with the RSES Guiding Principles for the Dublin Metropolitan Area and employment land and consistent with RPO 4.3.</p> <p>The submission indicates that the Department of Defence Security Zone has been removed from the aviation maps. However, this is not the case, as they are identified on Map 13 General Aviation of the Draft Plan. Policy related to the security zone is set out in Chapter 13 of the Draft Plan under section 13.9.5.</p> <p>The submission research indicates a growing demand for modern industrial and logistics facilities in south west Dublin and highlights displacement from traditional EE centres based in Tallaght and the Naas road as one of the reasons for this</p> <p>Any displacement from the regeneration areas are not envisaged to occur in the short-medium term as existing businesses are under no obligation to relocate. The Framework Plan for the Naas Road lands (CityEdge) has undergone public consultation and further consultation will be undertaken as part of a statutory plan for the area to be commenced in 2022. Potential for intensification and consolidation of existing uses will be examined as part of the planning process but any such intensification will take time.</p>
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		<p>Objective CS5 Objective 4 sets out the commitment to monitor and further develop the database of employment lands within the County. As set out above, the employment evidence base prepared to support the draft County Development Plan demonstrates that there is sufficient land available to support the future identified employment needs. However, the Council does recognise that trends in the wider economy can quickly impact on employment lands, and as such the Council considers it will be important to monitor this situation and will undertake a further evidence-based analysis of employment lands in the County within two years of the Plan coming into effect. Should a need be identified for further employment zoning within the lifetime of the Plan a Variation to the Plan will be initiated informed by:</p> <ul style="list-style-type: none"> <li>• Analysis of the type of employment need</li> <li>• Analysis of the appropriate location/s to serve such need</li> <li>• Relevant National and Regional policy and proper planning and sustainable development.</li> </ul> <p>It is noted that the submission has included a review of flood risk and that this review concludes that ‘the flood risk to the area has already been significantly reduced by the adjacent SD19A/0370 development and can be further reduced by the stated measures to reroute and store extreme flood flows around the edge of the site. The proposals reduce flood risk and provide protection to the 0.1%AEP standard for cross catchment flows from the Camac and therefore protect a significant amount of existing development within Greenogue Business Park whilst not increasing flow to the downstream Baldonnel/Griffeen system’.</p> <p>As part of the Plan process, proposals for rezoning were assessed as part of the SFRA and SEA of the Plan. The assessment for the subject lands indicated that they were within Flood Zone A (1% AEP fluvial floodplain as identified in the CFRAM study) of the Camac River, as defined in the OPW’s guidance “The Planning System and Flood Risk Management Guidelines for Planning</p>
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		<p>Authorities 2009". Based on the preceding planning assessment, the zoning of these lands to EE does not satisfy the Justification Test as described in Section 4.23 of the OPW Guidelines. It is also noted that the Camac River is currently the subject of a live Flood Alleviation Study by South Dublin County Council, Dublin City Council and the OPW and solutions to the existing catchment-wide flooding problems are yet to be identified.</p> <p>Taking account of the commitment to review the need for further employment zoned lands within the lifetime of the Development Plan, and to the justification test for plan making set out in the Planning System and Flood Risk Guidelines 2009, it is considered that the lands should not be rezoned.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p><a href="#">SD-C195-257 Diarmuid Phelan</a></p>	<p>Submission relates to lands located at Kiltalown, Saggart, just off the N81 near the junction with Mount Seskin road, of approx. 75 ha. Rezoning for this site is split into three areas as follows:</p> <ul style="list-style-type: none"> <li>- Northern area of the former golf club (c. 26 ha.);</li> <li>- The middle section of lands to the south of the former golf course (c. 12 ha.); and</li> <li>- The uplands further to the south (c. 30 ha.).</li> </ul> <p>To note, the site has a proposed Natural Heritage Area: the Lugmore Glen PNHA001212. Also the Draft Development Plan 2022-2028 has a proposal for a new section of road, running south-westwards across the site, from the N81 to join Mount Seskin Road.</p> <p>Submission looks for the removal of the 'OS' zoning on the land, due to the zoning no longer reflecting the use of the site. It is also noted that the 'OS' zoning was applied to part of</p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted.</p> <p>The submission requests three changes to zoning across the lands which are dealt with in turn.</p> <p><b>Lands to the north:</b></p> <p>Located south of the N81 and between Mt Seskin Road and Kiltalown Lane, lands are requested to be rezoned from RU and OS to EE with an SLO to facilitate warehousing and ancillary auction uses. The lands are currently in agricultural use with Farmyard 1 identified within the northeastern area.</p> <p>The submission sets out the urban edge location of these lands, opposite lands proposed for development at Killinarden and adjacent to other urban type uses. The difficult experience in farming this land is explained, including levels of criminality and anti-social behaviour experienced.</p>

	<p>the lands which have never formed part of the golf course, which included two farm complexes.</p> <p>Submission looks to replace the OS and HA-DM zoning with RU, due to non corresponding uses not corresponding with the activity on the ground. Submitted that a more appropriate boundary between RU and HA-DM is located further uphill (proposals for alteration to zoning shown on map attached with submission).</p> <p>Submission also looks for a more appropriate use of the lands located to the north of the site which would permit lower intensity commercial uses in the form of land use zoning EE. This would be an appropriate use on the urban edge of the site and provide needed facilities and a buffer between the remaining farm and current problematic intrusion from the urban fringe (Trespassing and crime on site).</p>	<p>The Draft Plan under EDE1 Objective 3 looks to ensure that there is sufficient supply of zoned and serviced lands at suitable locations to accommodate a range of enterprise and employment development types and to promote growth by strengthening the integration between employment, housing and transportation.</p> <p>Under Section 2.6.8 Employment Lands, the Draft Plan carried out an analysis of available lands which have potential to generate jobs. The purpose of this analysis was to ascertain whether sufficient employment lands are zoned to provide for the projected additional workforce for the Plan period up to 2028. Based on the analysis, there is a total capacity, excluding REGEN lands, to develop 624 hectares to facilitate further employment. This would more than meet the projected employment growth of 18,336 jobs over the Plan period set out in section 2.6.8 of the Core Strategy in the Draft Plan.</p> <p>The location of future employment needs in SDCC is not reliant solely on the Objective 'EE' zoned employment lands but rather spread across a range of zoning categories including REGEN, SDZ, MRC, RW and LC/VC/DC/ TC, where commercial development is either 'Permitted in Principle' or 'Open for Consideration'.</p> <p>It is further highlighted that the submissions received from the OPR and EMRA welcomed the evidence-based approach that has informed the strategy in the Draft Plan and considered the existing land zoned for employment to be consistent with the RSES Guiding Principles for the Dublin Metropolitan Area and employment land and consistent with RPO 4.3.</p> <p>As set out above, the employment evidence base prepared to support the draft County Development Plan demonstrates that there is sufficient land available to support the future identified employment needs. However, the Council does recognise that trends in the wider economy can quickly impact on employment lands, and as such the Council considers it will be important to</p>
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		<p>monitor this situation and will undertake a further evidence-based analysis of employment lands in the County within two years of the Plan coming into effect. Should a need be identified for further employment zoning within the lifetime of the Plan a Variation to the Plan will be initiated informed by:</p> <ul style="list-style-type: none"> <li>• Analysis of the type of employment need</li> <li>• Analysis of the appropriate location/s to serve such need</li> <li>• Relevant National and Regional policy and proper planning and sustainable development.</li> </ul> <p>A new objective to be inserted into the Plan has been recommended to this effect.</p> <p>Therefore, while the difficulties being encountered in farming the land are acknowledged it is not appropriate, at this time, to rezone the lands to EE.</p> <p>It is also noted in the submission that a road proposal runs through the land. The Draft Plan shows a spur from the N81 to Mount Seskin Road. This was left on the Draft Plan in error and recommendation for its removal is contained in the CE Recommendations for Chapter 7. Table 7.6 of the Sustainable Movement Chapter 7 indicates local improvements to the national road, junction improvements and road safety measures are medium to long-term objectives for the Blessington Road/N81. This was a change to the 2016 Development Plan where a more ambitious road realignment was to continue from the spur westwards to link with an outer orbital route. No funding for this road is forthcoming and it has been removed from the Draft Plan, with the section identified left on the map in error.</p> <p><b>Lands zoned 'OS':</b></p> <p>The subject lands are in part zoned OS 'to preserve and provide for open space and recreational amenities'. The lands comprised the former golf course known as Hazel Grove Golf Club and it is indicated in the submission that the OS zoning encompasses more</p>
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		<p>than the former golf course. The golf club use has long ceased, and the land is now in agricultural use. Having consulted with the Public Realm section of the Council, the lands are not required for Open Space and the rezoning to RU is considered more appropriate.</p> <p>It is noted that there is a proposed Natural Heritage Areas (pNHA) to the west of the site along the Tallaght Stream, Lugmore Glen pNHA 001212. The recommendation for a change of zoning should include a SLO 'To promote opportunities to improve the habitat relating to the Lugmore Glen pNHA and to ensure that any proposals for development have full regard to the sensitivities of the area along the Tallaght Stream'</p> <p><b>HA-DM Zoning:</b></p> <p>The submission seeks an area of land to the south of the landholding to be rezoned from HA-DM to RU, indicating that the zoning boundary does not reflect what is on the ground. It is also set out in the submission that this is a restrictive zoning with only agriculture, car parks (but not above the 350m contour) and open space provided for as permitted in principle. This is the case.</p> <p>The HA-DM zoning is an extensive one which provides a cohesive protection for the sensitive upland area of the County with the objective 'To protect and enhance the outstanding natural character of the Dublin Mountains Area'. Having regard to the fact that agriculture is permitted in the zoning, to the lands rising up to 350m in height as part of the northern slopes of the Knockannea/Mt Seskin hill and being in agricultural use, it is considered that a rezoning to RU is not appropriate.</p> <p>Having regard to the different elements of rezoning being requested and outlined above, it is recommended that the lands currently zoned as OS should be rezoned to RU with an SLO and that the remaining lands should retain their zoning objectives contained in the Draft Plan.</p>
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		<p><b>CE Recommendation:</b></p> <p>Rezone lands zoned OS to RU with an associated SLO to read:</p> <p>To promote opportunities to improve the habitat relating to the Lugmore Glen pNHA and to ensure that any proposals for development have full regard to the sensitivities of the area within the pNHA and along the Tallaght Stream.</p>
<p>SD-C195-289 M. F Dineen</p> <p>SD-C195-290 M. F Dineen</p>	<p>Submission relates to lands located at Slade Lane, Saggart, Co. Dublin for the purpose of rezoning to EE, in order to regularise the planning status of the site by undertaking the necessary sequence of actions required to do so. The need for the submitted is due to:</p> <ul style="list-style-type: none"> <li>- Need to retain suitable plant yard site, near but not within an urban setting in order to sustain its existing business activities (not feasible in an urban area);</li> <li>- Site is currently zoned RU, yet the site has little value for agricultural use or as part of a policy of protection for greenbelt;</li> <li>- Proposal would not constitute the introduction of industrial or enterprise land use to a rural area because the character is already heavily industrialised;</li> <li>- Proposed zoning is consistent with Draft CDP EDE1 Objective 3; and</li> <li>- Proposed site is a legacy site which has been in planning limbo for some time, where it can be more pragmatically zoned and developed in a sustainable manner which is consistent with development policy.</li> </ul>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted.</p> <p>The Draft Plan under EDE1 Objective 3 looks to ensure that there is sufficient supply of zoned and serviced lands at suitable locations to accommodate a range of enterprise and employment development types and to promote growth by strengthening the integration between employment, housing and transportation.</p> <p>Under Section 2.6.8 Employment Lands, the Draft Plan carried out an analysis of available lands which have potential to generate jobs. The purpose of this analysis was to ascertain whether sufficient employment lands are zoned to provide for the projected additional workforce for the Plan period up to 2028. Based on the analysis, there is a total capacity, excluding REGEN lands, to develop 624 hectares to facilitate further employment. This would more than meet the projected employment growth of 18,336 jobs over the Plan period set out in section 2.6.8 of the Core Strategy in the Draft Plan.</p> <p>The location of future employment needs in SDCC is not reliant solely on the Objective 'EE' zoned employment lands but rather spread across a range of zoning categories including REGEN, SDZ, MRC, RW and LC/VC/DC/ TC, where commercial development is either 'Permitted in Principle' or 'Open for Consideration'.</p>

		<p>The submissions received from the OPR and EMRA welcomed the evidence-based approach that has informed the strategy in the Draft Plan and considered the existing land zoned for employment to be consistent with the RSES Guiding Principles for the Dublin Metropolitan Area and employment land and consistent with RPO 4.3.</p> <p>Notwithstanding the above, CS5 Objective 4 of the Draft Plan looks to monitor employment lands within the County. As set out above, the employment evidence base prepared to support the draft County Development Plan demonstrates that there is sufficient land available to support the future identified employment needs. However, the Council does recognise that trends in the wider economy can quickly impact on employment lands, and as such the Council considers it will be important to monitor this situation and will undertake a further evidence-based analysis of employment lands in the County within two years of the Plan coming into effect. Should a need be identified for further employment zoning within the lifetime of the Plan a Variation to the Plan will be initiated informed by:</p> <ul style="list-style-type: none"> <li>• Analysis of the type of employment need</li> <li>• Analysis of the appropriate location/s to serve such need</li> <li>• Relevant National and Regional policy and proper planning and sustainable development.</li> </ul> <p>A new objective has been recommended for insertion into the Plan in this effect.</p> <p>The planning status of the site and use by Grehan Plant Hire is noted. However, to rezone the site at this time would be ad hoc and piecemeal zoning that would not accord with proper planning and sustainable development.</p> <p>Taking the above into consideration, having regard to the proposed objective to review employment zoning during the development plan period, and the zoning and policies/objectives</p>
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		<p>from the Draft Plan, it is considered that this proposed zoning is not appropriate at this time.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<p>SD-C195-31 William Lavelle</p> <p>SD-C195-225 An Claiomh Glas</p>	<p>The submission outlines disappointment that the Draft Plan proposes rezoning lands in Lucan Village north of the Liffey to EE instead of REGEN as this would not permit uses including Community Centre, Residential, Shop-Neighbourhood or Work-Live Unit, all of which would represent appropriate and highly-valuable additions to this area and to Lucan Village generally. It is considered that REGEN zoning objective should be retained.</p> <p>It is noted that another submission is also supportive of the rezoning of the Hills Industrial Site from Regeneration to Employment use.</p>	<p><b>CE Response:</b></p> <p>The lands in question were rezoned in the Draft Plan to EE (general employment) from their change to Regen in the 2016 Development Plan. At the time they were rezoned REGEN in the 2016 Plan the County did not have the extent of Regen zoning which it does today.</p> <p>The zoning for Lucan village to the south of the river is zoned Village Centre. This is a mixed-use zoning which provides for all of the uses referred to in the submission. The lands referred to on the north bank of the river have been employment lands historically, being the location of the old Hills Mills woollen factory. They are currently in light industrial and employment use. This use is considered to be important in facilitating general employment locally which it would be hard to accommodate within the village itself and which would furthermore mitigate against the need for local employees to travel further for such work.</p> <p>It should be further noted that there are 425ha of Regeneration (REGEN) zoned brownfield land which form part of the Tallaght Town Centre LAP and the Naas Road area and it is considered that these lands are better utilised as general employment, reflecting their existing use. The lands should therefore remain zoned employment.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>

Centre Type Rezoning Submission		
Submission No.	Submission Summary	CE response and recommendation
SD-C195-236 Circle K Ireland Energy Group Limited	<p>This submission relates to the Circle K filling station located at Parkway West, The Hill, Lucan Road Old, Palmerstown, Dublin 20 where a rezoning proposal from RES and OS to LC is put forward. It is considered that the the current zoning poses a fundamental risk to the operation of the service station and damages future development prospects.</p> <p>This submission raises the point that the Open Space land on site is not accessible and is located beside a busy road.</p> <p>Furthermore, the site was recommended to be granted permission for a recent development from the ABP inspector (overturned and refused by the board).</p> <p>The submission also states that the current zoning effects the sites current valuation and future development prospects, stating the RES and OS zoning objectives are anti-competitive and contravene the Retail Planning Guidelines.</p>	<p><b>CE Response:</b></p> <p>The issues raised in the submission are noted.</p> <p>The Retail Strategy for the Greater Dublin Area 2008 identifies Neighbourhood/Local Centres and Villages under Section 6.20 which aim to “<i>support the community and help solidify the role of the village/small town as an important local centre such as medical clinics, social services, pharmacies, cafes and post offices.....</i>” (Emphasis Added).</p> <p>It is noted that a Local Centre by definition is a centre that usually contains one supermarket ranging in size from 1,000-2,500 sq.m. with a limited range of supporting shops and retail services and possibly other services such as post offices, community centres or health clinics grouped together to create a focus for the local population. These centres meet the local day-to day needs of surrounding residents.</p> <p>Furthermore, Policy EDE8: Retail of the Draft Plan seeks to “protect the vitality and viability of existing centres in accordance with the retail framework provided by the Retail Planning Guidelines for Planning Authorities (2012, or any superseding guidelines) and EMRA RSES Retail Hierarchy.”</p> <p>Additionally, it is noted that Local Centres provide a focal point for the community providing retail, service and community role for the residents of South Dublin County. The subject site is located in close proximity to both a Village Centre at Palmerstown and Local Centre at Manor Road zoned areas. Therefore, given the nature of the location and existing village and local centre context, the request to rezone the subject lands from RES and OS to LC would undermine the designated Level 4 Centres within the County where the focus of the Draft Plan is</p>

		<p>to support and facilitate the consolidation of the quantum and quality of the retail offering in these centres.</p> <p>The submission refers to the fundamental risk in the operation of the site and developing the subject site. It is noted the petrol station is a long and established used on this site and with respect to the existing permitted uses, it is noted that Section 13.1.1' Land-Use Zoning Tables', (vi) Non-Conforming Uses of the Draft Plan states <i>'there are instances throughout the County where land uses do not conform with the zoning objective of a site. These include instances where such uses: 1. were in existence on 1st October 1964 (i.e. prior to planning legislation), or 2. have valid permission, or 3. have no permission and may or may not be the subject of enforcement proceedings. Development proposals that relate to uses referred to under categories 1 and 2 above, particularly those that would intensify non-conforming uses, will be permitted only where the proposed development would not be detrimental to the amenities of the surrounding area and would accord with the principles of proper planning and sustainable development. This includes the integration of land use and transport planning.'</i> Having regard to the function and existence of a service station at this location the provisions of Section 13.1.1 (vi) in the Draft Plan on non-conforming use is noted. and as such the current zoning does not prevent the existing service station from remaining.</p> <p>It is noted that reference is made to a recent planning application under ABP reference 309286-21 where the Board overturned the recommendation of the inspector on the grounds that there was insufficient justification for the proposed retail space for the subject site to significantly exceed the net floorspace of 100sqm recommended for Motor Fuel Stations in section 11.3.6 of the 2016 County Development Plan. It is also noted that while the inspector recommended a grant, the proposed development would have provided for a total 133sq m of retail and a café/restaurant. A rezoning to LC would provide</p>
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		<p>for much broader uses which, as outlined above, would undermine the existing local centre and village centre designations in the immediate locality. It is also noted that local centres are to serve the immediate needs of the surrounding community and not to draw in outside trade. The location of the service station and main access is from the N4 drawing a broader commuting population.</p> <p>Given the context of the site within a residential area already served by a local centre and village centre the proposed zoning is not considered appropriate.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p>SD-C195-92 Lidl Ireland GmbH</p>	<p>The submission raises issues with regard to the strategic context of retailing and emphasises the importance of retailing and the need for appropriate policies and objectives regarding same in future County Development Plans.</p> <p>The submission highlights the Scholarstown / Woodstown / Ballyboden area as being of their concern in terms of lack of provision of appropriate policies / objectives.</p> <p>This submission notes the following issues in relation to the promotion of retail competition and access to retail outlets in reasonable proximity to residential areas of Scholarstown/Woodstown and Ballyboden and requests the Draft Plan to:</p> <ol style="list-style-type: none"> <li>1. Recognise the importance of competition in the retail sector and the third National Policy Objective of the Retail Planning Guidelines (2012);</li> <li>2. Formally recognise the risk of a shift towards food shopping in particular online/remote methods, in terms of loss of footfall;</li> </ol>	<p><b>CE Response:</b></p> <p>The issue raised in the submission are noted. The issues and requests set out in this submission will be dealt with in numerical order to match that of the submission summary.</p> <p>1. The submission refers to the third national policy objective of the Retail Planning Guidelines (2012) ‘Competitiveness in the Retail Sector’ which seeks to ensure that the planning system continues to play its part in ensuring an effective range of choice for the consumer, thereby promoting a competitive marketplace. It is noted that The Retail Planning Guidelines for Planning Authorities, DECLG (2012) and the retail hierarchy set out in the RSES, form the basis for retail planning in South Dublin County. The Draft Plan recognises and states that that the planning system must continue to play a key role in supporting competitiveness in the retail sector for the benefit of the consumer and that it also promotes and supports the vitality and viability of city and town centres. This is supported by the overarching Policy EDE8 which seeks to <i>‘ensure adequate retail provision at suitable locations in the County, having regard to the sequential approach, and protect the vitality and viability of</i></p>

	<ol style="list-style-type: none"> <li>3. Recognise the importance of a sufficiently dispersed food shopping network;</li> <li>4. Recognise the lack of retail provision in Scholarstown, Woodstown and Ballyboden area and include a specific objective to reverse this;</li> <li>5. Designate an additional Local Centre in this area;</li> <li>6. Encourage Shop-Neighbourhood provision in the existing residential zone by providing for the use to be Permitted in Principle; and</li> </ol> <p>Remove reference to 'small' in the definition of the Shop-Neighbourhood.</p>	<p><i>existing centres in accordance with the retail framework provided by the Retail Planning Guidelines for Planning Authorities (2012, or any superseding guidelines) and EMRA RSES Retail Hierarchy.'</i></p> <p>2. Section 9.4.3 discusses the challenges facing traditional retailing. The Draft Plan acknowledges that trends in retailing are continuing to evolve as online shopping increases its share of trade and notes that forecasts are suggesting that online shopping could rise to 25% of sales by 2030. It is understood that that this poses significant challenges to business models of shopping centers and may lead to vacancy in towns/village centres The Draft Plan recognises that there is a need to provide on-going innovation as the role of these centres evolves. The Draft Plan will continue to support retail development at the different levels of the retail hierarchy, recognising the role of retail in creating a vibrant mix of uses in support of our communities while cognisant of the on-going changing retail trends. This is supported through Policy EDE8 and associated objectives as well as the policies and objectives on retailing in Chapter 9.</p> <p>3. It is noted that the mixed-use zoning and associated use classes as set out in the Draft Plan and Appendix which applies to centres generally facilitates a range of uses. With regard to larger food shops such as supermarkets, EDE8 Objective 7 seeks the application of a sequential approach to retail development thus ensuring the right location and catchments for such developments.</p> <p>4. The areas referred to in the submission are located within the Neighbourhood of 'Templeogue/Walkinstown/Rathfarnham' as detailed in the Draft Plan. It should be noted that within this neighborhood there are 27 no. Town/Village/District/Local Centres. It is noted that the LAP for Ballycullen/Oldcourt included for Local Centre facilities and permission has been granted for a c.1500sq m convenience store within the local</p>
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		<p>centre. It is not considered that there is an under provision of lands zoned which can accommodate retail in the area.</p> <p>Furthermore, QDP14 SLO 2 seeks to prepare a new Local Area Plan for Ballyboden. Therefore, it is considered inappropriate to include for a specific objective to increase the retail offering and any new retail developments will be assessed under the policies and objectives of the Draft Plan and a new LAP for Ballyboden once prepared and adopted.</p> <p>5. The Retail Strategy for the Greater Dublin Area 2008 identifies Neighbourhood/Local Centres and Villages under Section 6.20 which aim to “<i>support the community and help solidify the role of the village/small town as an important local centre such as medical clinics, social services, pharmacies, cafes and post offices.....</i>” (Emphasis Added). These centres meet the local day-to day needs of surrounding residents. Local Centres provide a focal point for the community providing retail, service and community role for the residents of South Dublin County. Having regard to the number of existing Village and Local Centres which provide such services, to designate more within this neighbourhood would undermine the existing centers.</p> <p>6 &amp; 7. It should be noted that ‘Shop-Neighbourhood’, as defined under Appendix 6 ‘Definition of Use-Classes’ of the Draft Plan, relates to “<i>smaller shops giving a localised service in a range of retail trades or businesses such as butcher, grocer, newsagent, hairdresser, dry cleaning or launderette, and designed to cater for normal neighbourhood requirements. It also includes a small supermarket on a scale directly related to the role and function of the settlement and its catchment and not exceeding 2,500 sq.m. net retail floorspace</i>”. A ‘Shop-Neighbourhood’ use would be appropriately accommodated adjacent to existing or new residential development and within Urban Centres of the County, and as such, this is reflected in the land use zoning objectives and tables as open for consideration in ‘RES’ zones. In this context, it is noted that ‘Shop-Neighbourhood’ use is</p>
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		<p>open for consideration. Given that this zoning covers existing residential areas it is not appropriate for it to be permitted in principle as proposals relating to same must be assessed on their own merits and compliance with policies and objectives set out in the Draft Plan. It is also not considered appropriate to remove the word 'small' as it appears in the definition as this would undermine the protection of urban centers and would be at variance with the Use Class Definitions and Retail Hierarchy for county thus skewing the development of appropriately scaled and located retailing offerings.</p> <p><b>CE Recommendation:</b> No change to Draft Plan.</p>
<p>SD-C195-179 Circle K Ireland Energy Group Limited</p> <p>SD-C195-182 Circle K Ireland Energy Group Limited</p> <p>SD-C195-184 Circle K Ireland Energy Group Limited</p> <p>SD-C195-189 Circle K Ireland Energy Group Limited</p>	<p>The submissions relate to a number of service stations (Circle K) located in various areas within the County which include sites at:</p> <ol style="list-style-type: none"> <li>1. City Avenue within the Citywest Business Campus, Citywest;</li> <li>2. Nangor Road, adjacent to Grange Castle Business Park, Clondalkin;</li> <li>3. Naas Road in Clondalkin; and</li> <li>4. Southern side of Fonthill Road South, at Newlands Cross, Dublin.</li> </ol> <p>All of the submissions request their sites to be rezoned from Employment and Enterprise (EE) to Local Centre'(LC).</p> <p>The submissions highlight a number of varying reasons as to why the current zoning off EE is not appropriate including the following:</p> <ul style="list-style-type: none"> <li>• It's undermining effect on the operation and development of the existing permitted service stations;</li> <li>• Petrol Station, Shop-Local and Service Garage are all permitted in principle on EE zoned lands;</li> </ul>	<p><b>CE Response:</b> The issues raised in the submissions are noted.</p> <p>The Retail Strategy for the Greater Dublin Area 2008 identifies Neighbourhood/Local Centres and Villages under Section 6.20 which aim to “<i>support the community and help solidify the role of the village/small town as an important local centre such as medical clinics, social services, pharmacies, cafes and post offices.....</i>” (Emphasis Added). It is noted that a Local Centre by definition is a centre that usually contains one supermarket ranging in size from 1,000-2,500 sq.m. with a limited range of supporting shops and retail services and possibly other services such as post offices, community centres or health clinics grouped together to create a focus for the local population. These centres meet the local day-to day needs of surrounding residents. Furthermore, Policy EDE8: Retail of the Draft Plan seeks to “<i>protect the vitality and viability of existing centres in accordance with the retail framework provided by the Retail Planning Guidelines for Planning Authorities (2012, or any superseding guidelines) and EMRA RSES Retail Hierarchy.</i>”</p>

	<ul style="list-style-type: none"> <li>• EE zoning does not reflect the nature of the established and permitted use at the subject sites, nor does it take into account for residential nature of surrounding lands;</li> <li>• A number of the service stations directly adjoin existing residential areas and in one case a Maldron Hotel along the Fonthill Road;</li> <li>• The sites current commercial use and existing zoning objective fails to reflect the current and permitted use and has undermined the sites current operations;</li> <li>• EE zoning is anti-competitive and contravenes national policy (Retail Planning Guidelines and Draft County Development Plan Guidelines); and</li> <li>• With respect to Citywest and Grangecastle Business Park sites, it is considered that the EE zoning puts a misplaced emphasis on the site's location adjacent a business campus; and With respect to the Site at Fonthill Road, it is noted that on the opposite side there is land zoned 'LC', with a number of businesses operating in this area, with the Filling Station acting as an additional service complementing this centre.</li> </ul>	<p>Local Centres provide a focal point for the community providing retail, service and community role for the residents of South Dublin County and while it is noted that the subject sites are located within urban areas, they are already in close proximity to existing Village and Local Centres which provide such services. EDE14 Objective 1 supports these local centres:</p> <p>To support the development and enhancement of local centres as sustainable, multifaceted, retail led mixed use centres, enhancing local access to daily retail needs, which do not adversely impact on or draw trade from higher order retail centres.</p> <p>Moreover, each of the sites are located within established employment zoned areas.</p> <p>The request to rezone all of these subject lands from EE to LC would therefore undermine the designation of Level 4 Centres within the County where the focus of the Draft Plan is to support and facilitate the consolidation of the quantum and quality of the retail offering in these areas.</p> <p>Notwithstanding the above, and with respect to the existing permitted uses on site, it is noted that Section 13.1.1' Land-Use Zoning Tables', (vi) Non-Conforming Uses of the Draft Plan states <i>'there are instances throughout the County where land uses do not conform with the zoning objective of a site. These include instances where such uses: 1. were in existence on 1st October 1964 (i.e. prior to planning legislation), or 2. have valid permission, or 3. have no permission and may or may not be the subject of enforcement proceedings. Development proposals that relate to uses referred to under categories 1 and 2 above, particularly those that would intensify non-conforming uses, will be permitted only where the proposed development would not be detrimental to the amenities of the surrounding area and would accord with the principles of proper planning</i></p>
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		<p><i>and sustainable development. This includes the integration of land use and transport planning.'</i></p> <p>Having regard to the function and existence of a service station at these locations, to the existing local centres and their function, to the current EE zoning of the sites, and the provisions of Section 13.1.1 (vi) in the Draft Plan, it is not considered appropriate to rezone the service stations from EE to LC.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p>SD-C195-186 Circle K Ireland Energy Group Limited</p>	<p>This submission relates to a petrol station located on the southern side of Blessington Road, Tallaght, Dublin and currently comprises a single storey service building with a forecourt area with canopy. The site operates as a service station, which was granted planning permission for redevelopment under SD02A/0224.</p> <p>It is contended that the current zoning of the site will restrict the operation and development of the permitted and established petrol/service station use.</p> <p>This submission argues that 'Local Centre' (LC) should be applied to this site. The subject site is located on the edge of an urban area, operating as a local centre use supporting vitality and viability for the area. The submission goes on to state that the site will continue to operate as a petrol station, but the future focus will be expanding the range of services including additional retail floorspace, expanded food court/restaurant and other active ground floor uses.</p> <p>The submission states that they cannot accept a zoning proposal that fundamentally undermines the ongoing operation of the service station and damages both its current valuation and future development prospects. It also states that at present the current</p>	<p><b>CE Response:</b></p> <p>The issues raised in the submission are noted.</p> <p>The Retail Strategy for the Greater Dublin Area 2008 identifies Neighbourhood/Local Centres and Villages under Section 6.20 which aim to “<i>support the community and help solidify the role of the village/small town as an important local centre such as medical clinics, social services, pharmacies, cafes and post offices.....</i>” (Emphasis Added). It is noted that a Local Centre by definition is a centre that usually contains one supermarket ranging in size from 1,000-2,500 sq.m. with a limited range of supporting shops and retail services and possibly other services such as post offices, community centres or health clinics grouped together to create a focus for the local population. These centres meet the local day-to day needs of surrounding residents. Furthermore, Policy EDE8: Retail of the Draft Plan seeks to “protect the vitality and viability of existing centres in accordance with the retail framework provided by the Retail Planning Guidelines for Planning Authorities (2012, or any superseding guidelines) and EMRA RSES Retail Hierarchy.”</p>

	<p>zoning goes against what is stated within the Retail Planning Guidelines and the Draft County Development Plan Guidelines.</p> <p>The submission also refers to section 13.7.3 within the draft CDP stating 'that motor fuel filling stations will not generally be encouraged within the core retail area of urban centres or in rural areas', which undermines the continued operation and future development of the petrol station.</p> <p>To conclude, the submitter actively opposes the proposed RU zoning and believes the petrol/service station should be zoned LC in light of the above arguments, failing this it should be given a zoning that reflects its developed, brownfield nature.</p>	<p>Additionally, it is noted that Local Centres provide a focal point for the community providing retail, service and community role for the residents of South Dublin County.</p> <p>Given the nature of the location, on the southern side of the N81, where urban development is concentrated on the northern side of the N81, the request to rezone the subject lands from RU to LC would undermine the existing RU zoning and the existing designated Level 4 Centres such as Saggart Village Core, Sundale Shopping Centre and Brookfield Centres and the designated level 3 centre at Citywest all located within the existing urban areas. It is a focus of the Draft Plan to support and facilitate the consolidation of the quantum and quality of the retail offering in urban centres.</p> <p>The submission refers to the Section 13.7.3 of the Draft Plan and under this section the submission considers that continued operation and future development of the petrol station will be hampered. It is acknowledged that the petrol station is a long and established use on this site and with respect to the existing permitted uses, it is noted that Section 13.1.1' Land-Use Zoning Tables', (vi) Non-Conforming Uses of the Draft Plan states <i>'there are instances throughout the County where land uses do not conform with the zoning objective of a site. These include instances where such uses: 1. were in existence on 1st October 1964 (i.e. prior to planning legislation), or 2. have valid permission, or 3. have no permission and may or may not be the subject of enforcement proceedings. Development proposals that relate to uses referred to under categories 1 and 2 above, particularly those that would intensify non-conforming uses, will be permitted only where the proposed development would not be detrimental to the amenities of the surrounding area and would accord with the principles of proper planning and sustainable development. This includes the integration of land use and transport planning.'</i> Having regard to the function and existence of a service station at this location and the</p>
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		<p>provisions of Section 13.1.1 (vi) in the Draft Plan, it is noted that potential use associated with the existing petrol station would be permitted/open for consideration and that the RU zoning does not prevent the existing service station from remaining.</p> <p>Furthermore, the subject lands are currently zoned Rural (RU) – ‘<i>To protect and improve rural amenity and to provide for the development of agriculture</i>’. The zoning of the subject land and surrounding lands as objective RU maintains the established visual and environmental buffer between the N81 and wider Tallaght area and restricts the development of the area for inappropriate land uses. While the established permitted use and continuation of that is acceptable, to allow for the site to be zoned LC would provide for a much broader range of uses on this southern side of the N81 which would undermine the policies and objective pertaining to the RU and to LC and would be contrary to the proper planning and sustainable development of the area.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p>SD-C195-194 John and Frank Gargan</p>	<p>The submission seeks to rezone lands comprising of a total of 2.524Ha from RU to ‘VC’ Village Centre, located along the Peamount road and adjacent to an established residential development in the north of the settlement of Newcastle.</p> <p>The submission details why the rezoning would be appropriate on the subject lands for the following reasons:</p> <ul style="list-style-type: none"> <li>• Subject lands adjoin the current zoning boundary in the Newcastle LAP and are served by an existing footpath along the eastern boundary;</li> <li>• Rezoning would accommodate comparison shopping facilities to support the growing population of Newcastle;</li> </ul>	<p><b>CE Response:</b></p> <p>The issues raised in the submission are noted.</p> <p>The Retail Strategy for the Greater Dublin Area 2008 identifies Neighbourhood/Local Centres and Villages under Section 6.20 which aim to “<i>support the community and help solidify the role of the village/small town as an important local centre such as medical clinics, social services, pharmacies, cafes and post offices.....</i>” (Emphasis Added). It is noted that Neighbourhood Centres, Local Centres- Small Towns and Villages by definition is a centre that usually contains one supermarket ranging in size from 1,000-2,500 sq.m. with a limited range of supporting shops and retail services and possibly other services such as post</p>

	<ul style="list-style-type: none"> <li>• Opportunity in alternative location to the town centre in order to provide necessary car-based service provision while protecting the Village core of Newcastle;</li> <li>• Need for one supermarket within the level 4 settlement, as defined by retail hierarchy, has been met in the LAP:</li> <li>• Zoning of the subject lands would act as a natural extension to the LAP lands;</li> <li>• Village Centres would accommodate a shop-neighbourhood use and would support the compact growth policies of the plan;</li> <li>• Address the concerning lack of retail services in the Newcastle area to support the growing population;</li> <li>• Capable of a providing a medium to large scale convenience retail development which would be not deliverable within the village core due to historic features; and</li> <li>• Subject lands would also be capable of providing adequate car parking for such a retail development.</li> </ul>	<p>offices, community centres or health clinics grouped together to create a focus for the local population.</p> <p>These centres meet the local day-to day needs of surrounding residents. Furthermore, Policy EDE8: Retail of the Draft Plan seeks to “protect the vitality and viability of existing centres in accordance with the retail framework provided by the Retail Planning Guidelines for Planning Authorities (2012, or any superseding guidelines) and EMRA RSES Retail Hierarchy.”</p> <p>Table 9.2 of the Draft Plan identifies Newcastle Village Core as a ‘Village Centre’ in accordance with the Retail Hierarchy. Additionally, it is noted that a Village Centre provides a focal point for the community providing retail, service and community role for the residents of South Dublin County. Therefore, given the out-of-town location, existing and permitted facilities and potential within Newcastle Village Core, the request to rezone the subject lands from RU to VC would undermine Newcastle Village Core, where the focus of the Draft Plan is to support and facilitate the consolidation of the quantum and quality of the retail offering.</p> <p>Furthermore, the subject lands are located outside the Village Core and Expansion Area identified in the Newcastle Local Area Plan 2012-2018 (As extended to 2022). Section 5.5.1 of the LAP states “<i>The role of Main Street as the centre of village activity will be supported by a Village Expansion area</i>”. Section 2.7.3 states that there is “<i>scope for local commercial uses within Village Expansion Area</i>”. And Section 5.5.2.1 Objective LUD2 states: “<i>the preferred location for retail and service development along Main Street is around retail nodes situated close to existing businesses. Such development shall be commensurate to the local needs of Newcastle Village and shall comprise a medium sized supermarket (up to 1,500 sqm net) and small scale flexible use commercial and retail units</i>”.</p>
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		<p>Given the location of the subject and the policies of the Draft Plan, in particular EDE8 Objective 7 which seeks the application of a sequential approach to retail development and the provisions of the LAP, it is considered that the subject lands sequentially, are not preferable in terms of retail development.</p> <p>In addition, given the identified need in the Newcastle LAP (as set out in LUD2) that has not yet been fulfilled, it is considered that any proposals on the subject lands would require a full retail impact assessment as set out in the Draft Plan. Therefore, to rezone the subjects lands at this location for the provision of retail would be at variance with the policies and objectives set out in the Retail Guidelines, Draft Plan and Newcastle LAP.</p> <p>It is also noted that the VC zoning allows for mixed use development including residential. There is no requirement for additional residential capacity in Newcastle and any such zoning would be contrary to the core strategy of the Draft Plan.</p> <p>It is therefore considered that the subject lands should remain zoned Rural (RU) – ‘To protect and improve rural amenity and to provide for the development of agriculture’.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p>SD-C195-204 Jim Brogan Planning and Development Consultant</p>	<p>The submission is made on behalf of Blue Clusters Company Limited and seeks the rezoning of lands at the Spawell Sports and Leisure Centre on Wellington Lane, Templeogue.</p> <p>The requests the rezoning of the subject lands from Objective OS - “<i>To preserve and provide for open space and recreational amenities to zoning objective</i>” LC -“<i>To protect, improve and provide for the future development of Local Centres</i>”.</p> <p>The subject lands comprise of c. 3.94ha with the remainder of the landholding proposed to remain with the ‘OS’ zoning</p>	<p><b>CE Response:</b></p> <p>The issues raised in the submission are noted.</p> <p>It is noted that the proposal for a rezoning from Open Space to Local Centre relates to 3.94ha of the wider stated 13.8ha Open Space zoning at this location. The 3.94ha are currently in different types of commercial/sports use and car parking.</p> <p>The Retail Strategy for the Greater Dublin Area 2008 identifies Neighbourhood/Local Centres and Villages under Section 6.20 which aim to “<i>support the community and help solidify the role of</i></p>

	<p>objective. The submission states that the overall site area equates to 13.8ha.</p> <p>The submission sets out a number of reasons as to why the rezoning is considered appropriate to include the following:</p> <ul style="list-style-type: none"> <li>• Mixed use nature of the site to include golf, 5 aside pitches, a garden centre, public house and restaurant, retail uses, a grind school and fitness centre, gymnasium and dancefloor. The site also includes a pitch and putt course with the car park providing for 309 car parking spaces;</li> <li>• Zoning objective if maintained results in a number of non-conforming commercial uses on the subject lands including larges areas of hardstanding/car parking spaces;</li> <li>• Existing commercial uses and the OS zoning represents an anomaly and fails to recognise the potential of the area to contribute positively to much needed social and commercial infrastructure in the area;</li> <li>• Considers that the redevelopment of this area is critical to Dublin GAAs goal for the Spawell centre to provide for a state-of-the-art active recreational facility;</li> <li>• Noted that a Certificate of Exemption was received from South Dublin County Council for the laying out of a pitch and erection of balls nets at either end of the existing pitch and putt course in 2019;</li> <li>• In line with the provisions of the plan in regard to Quality Design and Healthy Placemaking and would act as key centre for the Templeogue/Walkinstown/Rathfarnham and Firehouse Neighbourhood Area. It is stated that there is very limited land within this neighbourhood area which would be capable of facilitating such a development; and</li> <li>• 'LC' zoning objective would have the potential to accommodate a nursing home/elderly care type facility which would be capable of catering for the future needs of the</li> </ul>	<p><i>the village/small town as an important local centre such as medical clinics, social services, pharmacies, cafes and post offices....."</i> (Emphasis Added). It is noted that a Local Centre by definition is a centre that usually contains one supermarket ranging in size from 1,000-2,500 sq.m. with a limited range of supporting shops and retail services and possibly other services such as post offices, community centres or health clinics grouped together to create a focus for the local population. These centres meet the local day-to day needs of surrounding residents. Furthermore, Policy EDE8: Retail of the Draft Plan seeks to "protect the vitality and viability of existing centres in accordance with the retail framework provided by the Retail Planning Guidelines for Planning Authorities (2012, or any superseding guidelines) and EMRA RSES Retail Hierarchy."</p> <p>Additionally, it is noted that Local Centres provide a focal point for the community providing retail, service and community role for the residents of South Dublin County.</p> <p>The subject lands currently provide a range of established community uses and services and while such uses do not fully align with the definition of a Level 4 Local Centre their existence must be recognised. It is noted that the Spawell is strategically located in terms of public transport corridors. In particular, the Spawell is a designated stop for Bus Connects which serves and connects the immediate and wider areas. In addition, the Spawell is located amongst a number of large well established housing developments.</p> <p>The submission refers to the previous planning history on the site as well as previous Specific Local Objectives which would have facilitated commercial and leisure facilities</p> <p>At 3.94 hectares in size potential impact on nearby Orwell Park Local Centre needs to be considered. However, given that many of the current uses on this part of the site are uses which accord with the local centre zoning, it is considered that a reduced LC</p>
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	<p>ageing population within this neighbourhood area, located close to existing residential areas and amenities.</p> <p>The submission further sets out detail in regard to the planning history of the subject lands which included permission for a new leisure centre and associated retail and commercial facilities granted in 2005 and 2010. The site during this time was provided with a Local Zoning Objective LZ 012 which made specific reference to facilitating the redevelopment of the subject lands for commercial, leisure and recreational purposes. The submission also states that this permission was extended in 2014 under planning reg. ref. SD01A/0006EP.</p> <p>The submission provides a background to the purchase and long-term development of the subject lands forming part of the 'Unleashing the Blue Wave – Strategy for Dublin GAA 2011-2017. It is stated that the proposal will facilitate the physical infrastructure deficits in the form of a development cluster of playing pitches with floodlights and all-weather capacity and ancillary facilities including walking and jogging trails which would be made available for shared usage to local clubs, schools and the local community. The submission sets out that the availability of lands for such facilities is limited with the subject lands offering an ideal opportunity for the development of such sporting facilities for the southern half of the County with good transport links and accessibility.</p>	<p>zoning could be accompanied with an SLO to limit the types of uses, particularly retail, which could be developed to ensure that the existing local centres are not being undermined.</p> <p>Having regard to the extent of the existing built area and so as not to encroach onto the existing green areas, it is considered appropriate to reduce the area of land sought for rezoning from 3.94ha to 3.27ha.</p> <p>It is also considered that residential should not be provided for to ensure that the rezoning serves wider community services in any future development.</p> <p>To support the redevelopment of 3.27ha to the southeast corner on lands zoned LC at the Spawell Sports and Leisure Centre, Wellington Lane, Templeogue to provide for sports club/facility and for uses indicated as permitted in principle under the LC zoning other than residential and petrol station and limiting retail provision in the form of shop-local or shop-neighbourhood to no more than 3 units which will not include a large supermarket.</p> <p><b>CE Recommendation:</b></p> <p><b>Amend Map 06</b> to rezone 3.27ha within the southeast corner of lands at the Spawell Sports and Leisure Centre on Wellington Lane, Templeogue from:</p> <p>Objective OS – Open Space – <i>'To preserve and provide for open space and recreational amenities'</i></p> <p>To</p> <p>Objective LC – Local Centre – <i>'To protect, improve and provide for the future development of Local Centres'</i></p> <p>With an accompanying SLO on the lands placed in Chapter 9 section 9.5.6 Local Centres to read as follows:</p> <p><b>Insert New EDE14 SLO 1:</b></p>
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		<p><i>To support the redevelopment of 3.27ha on lands zoned LC to the southeast corner of the Spawell Sports and Leisure Centre, Wellington Lane, Templeogue to provide for sports club/facility and for uses indicated as permitted in principle under the LC zoning other than residential and petrol station and limiting retail provision in the form of shop-local or shop-neighbourhood to no more than 3 units which will not include a large supermarket.</i></p>
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**CE Recommendation:**



**Draft**



**Proposed Amendment**

[SD-C195-161 Hines Real Estate Ireland Limited](#)

The submission relates to Liffey Valley Shopping Centre and the adjoining lands. The submission indicates that currently Liffey Valley is zoned 'MRC - Major Retail Centre' (the only one in the County) and this submission seeks to have Liffey Valley Centre aligned with other Centres in the County and requests it

**CE Response:**

The submission seeks for the zoning of Liffey Valley Shopping Centre to be changed from 'MRC - Major Retail Centre' to 'TC-Town Centre', a Level 2 Town Centre.



	<p>to be zoned a Town Centre, and within this, as a Level 2 Town Centre.</p> <p>The submission highlights a number of reasons as to why the rezoning is considered appropriate:</p> <ul style="list-style-type: none"> <li>• The ambition for the Liffey Valley area is to deliver an urban hub within South Dublin County Council, that serves as a local and town centre, that is well connected by public transport (BusConnects hub) to the city;</li> <li>• Reinforces the expansion programme through the consolidation of the Centre as a mixed-use urban hub incorporating a variety of employment, including commercial office, and residential development.;</li> <li>• How Liffey Valley Zonings from 2004-2016 were zoned 'TC Town Centre';</li> <li>• How all major shopping areas in the County have the wider designation of 'TC Town Centre' zoning and Liffey Valley should be aligned with this;</li> <li>• Key to the success of retail centres is the mixed-use nature of the centres; and</li> <li>• Benefitting from significant public transport investment through the development of a BusConnects hub as part of the Core Bus Corridor Route 7 Liffey Valley to City Centre.</li> </ul> <p>The submission notes that in the Development Plans Guidelines, a standardised zoning is recommended for Planning Authorities to adopt in their Development Plans indicates that TC -Town Core zoning is the appropriate zoning proposed for Town Centres with both 'TC' and 'DC' zonings seeking a mix of uses in delivery of a quality urban environment, including integration of housing and employment uses to deliver compact growth.</p> <p>The submission is also accompanied by a number of supporting documents to include: 1. Commentary by KPMG FA on the Draft Core Strategy and HNDA 2022-2028 and consistency with NPF, EMRA RSES and the HNDA process. 2. Liffey Valley Movement</p>	<p>The core principle of the National Planning Framework is compact urban growth which will be delivered through the consolidation of the exiting-built footprint of settlements. The Draft Plan prioritises the development of existing zoned lands particularly within MASP Strategic Development Areas namely Adamstown, Clonburris, Tallaght, Naas Road and Fortunestown. It is noted that Liffey Valley has not been identified as a Strategic Development Area within the Metropolitan Area Strategic Plan.</p> <p>The Core Strategy and Settlement Strategy in Chapter 2 sets out population and housing figures which must be consistent with National and Regional policy and confirms that the County has enough land for a further 10,470 units (79%) above the net household need and therefore there is no need to re-zone additional lands or zone new additional lands over and above those currently set out under the current 2016 County Development Plan. Having regard to above figures set out in the Core Strategy and the current excess of zoned land, without the need for further zoning, it is considered that there is sufficient flexibility to meet the household requirements for 2031 and potentially up to 2040. The revised target figures in response to the OPR recommendations, set out separately under the response to the OPR, do not impact on the excess land capacity available to meet the revised targets. Therefore, to re-zone or zone new additional lands over and above those currently set out in the Draft Plan would be contrary to National and Regional planning policy.</p> <p>In this context, the rezoning of Liffey Valley to 'TC' which allows for residential would undermine the planned delivery of households within strategic residential growth sites identified within the Regional Metropolitan Area Strategic Plan at: Adamstown, Clonburris, Tallaght, Naas Road and Fortunestown which would be contrary to National and Regional Planning Policy. Therefore, to re-zone or zone new additional lands over</p>
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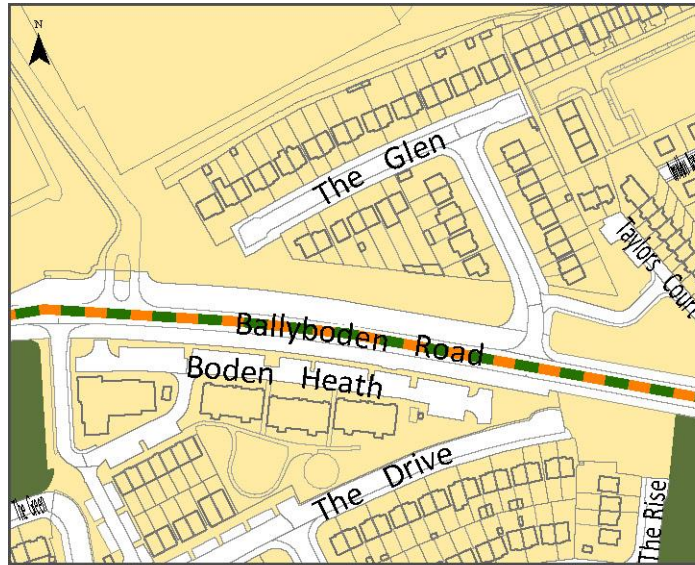
	<p>and Access - Systra Report. 3. Liffey Valley- PRAGMA Retail Report. 4. Liffey Valley Services - General Utilities Report. 5. Examples of existing statutory signage already referring to Liffey Valley as a 'Town Centre'.</p>	<p>and above those currently set out in the Draft Plan would be contrary to National and Regional planning policy.</p> <p>The Retail Strategy for the Greater Dublin Area 2008 was prepared by the Dublin and the Mid-East Regional Authorities and carried over into the Regional Spatial and Economic Strategy until such time as it may be reviewed. The retail hierarchy as expressed in the GDA strategy identifies Liffey Valley as a Level 2 Retail Centre.</p> <p>The significance of retailing as an employment sector and its role in placemaking is recognised in the National Planning Framework and the Regional Spatial and Economic Strategy (RSES). The Retail Planning Guidelines for Planning Authorities,DECLG (2012) and the retail hierarchy set out in the RSES, form the basis for retail planning in South Dublin County.</p> <p>With respect to the need for further employment, it is noted that the Draft Plan includes a land capacity analysis under Section 2.6.8 of Chapter 2 setting out the availability of zoned land for employment purposes. Based on the assessment carried out there is potential for 31,824 jobs on existing zoned undeveloped land. The need during the lifetime of the Plan amounts to 18,336 jobs and thus there is sufficient zoned land to meet the projected need without considering further land.</p> <p>It is noted that Liffey Valley alongside the Square in Tallaght form the only Level 2 retail centres within the County serving a significant catchment and providing significant employment opportunities. Policy EDE8: Retail of the Draft Plan seeks to “protect the vitality and viability of existing centres in accordance with the retail framework provided by the Retail Planning Guidelines for Planning Authorities (2012, or any superseding guidelines) and EMRA RSES Retail Hierarchy. Liffey Valley Shopping Centre is designated as a Major Retail Centre (MRC),</p>
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		<p>and this reflects the Level 2 Retail designation under the regional retail hierarchy set out in the RSES.</p> <p>EDE8 Objective 8 of the Draft Plan seeks “To direct new major retail floorspace in the County to designated centres at the appropriate level within the retail hierarchy, and to further direct major retail development in designated centres into the Core Retail Areas”. This objective is further supported by Policy EDE10, specifically through EDE10 Objective 2: To support and facilitate consolidation of the quantum and quality of the retail offering at the Liffey Valley Major Retail Centre.</p> <p>The request to rezone Liffey Valley Town Centre would undermine the designation of this area as it is only one of two Level 2 Centres within the County where the focus of the Draft Plan is to support and facilitate the consolidation of the quantum and quality of the retail offering in this area. Furthermore, Major Retail Centre zoning is specifically in place to differentiate from the uses in mixed use zoning areas such as Town Centre zoning.</p> <p>In this context, it is considered inappropriate to rezone the subject lands.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
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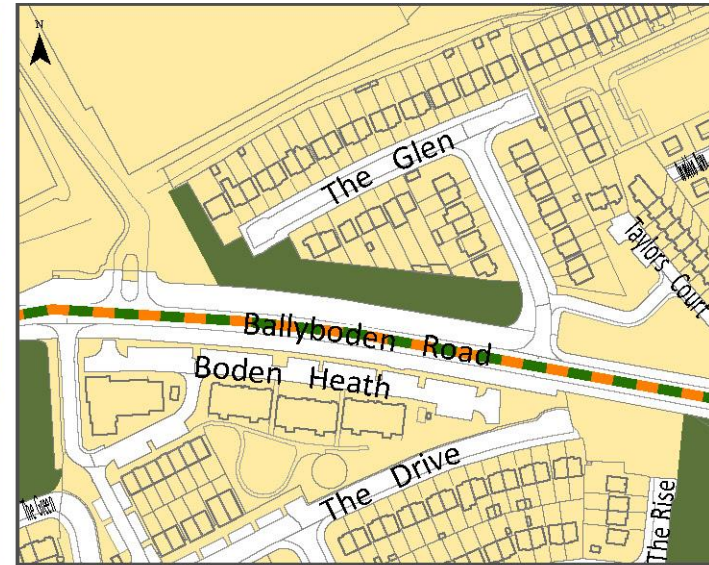
Open Space Zoning Submission		
Submission No.	Submission Summary	CE response and recommendation
<a href="#">SD-C195-25 Sarah Holland</a>	<p>The submission, on behalf of the residents of The Glen, Boden Park, requests to have their recreational green space rezoned as OS in keeping with the larger Boden Park estate.</p>	<p><b>CE Response:</b></p> <p>The submission requests that the green space of The Glen, Boden Park residential development is rezoned from RES to OS.</p>

	<p>It is noted that the Glen, Boden Park is a cul-de-sac separated from the larger Boden Park estate by the main road, Ballyboden Way whereby the two estates were once joined prior to the construction of this main road.</p> <p>The submission sets out a number of reasons as to why the subject lands should be zoned OS to include:</p> <ul style="list-style-type: none"> <li>• The green space is enclosed to the rear of houses numbered 11 to 23;</li> <li>• Provides a safe space for the children of the Glen to play, as well as a recreational area for dog walkers and gardeners and a pollinator corridor;</li> <li>• It is a safe and passively overlooked space;</li> <li>• Multiples uses for residents including informal outdoor gatherings, fresh air, gardening activities and exercise;</li> <li>• During covid the green space was vital for the community;</li> <li>• The nearest council park is Tymon an not easily accessible with no direct pubic transport route; and</li> <li>• Rezoning would be in accordance with strategic objective <i>“a strategically planned network of natural and semi-natural areas with other environmental features designed and managed to deliver a wide range of ecosystem services such as water purification, air quality, space for recreation and climate mitigation and adaptation”</i>.</li> </ul> <p>The submission is accompanied by a petition of signatures in support of the same and photos of the area.</p>	<p>The subject lands are located immediately adjacent to the Ballyboden Way with the larger Boden Park housing development on the other side of Ballyboden Way Road.</p> <p>The subject lands are zoned objective RES in their entirety within the Draft Plan and it is noted that they were also zoned RES in the 2016-2022 South Dublin Development Plan. Notwithstanding this, it would appear that the subject lands have an established open space setting ancillary to The Glen. They are laid out as open space with a landscaped pedestrian paths and cycle lane adjacent to Ballyboden Way and maintained landscaping. The subject lands also act as a natural and important buffer between a busy road and established housing development and further provide mitigation measures such as setback landscaping a noise barrier.</p> <p>Furthermore, it is noted that the subject lands do appear represent an area comprising of a narrow tract of incidental or ‘left-over’ land following the construction of the road. Moreover, the main public open space provision is provided for within the larger Boden Park housing development across the road and therefore the subject lands provide for the public open space provision for the residents of The Glen.</p> <p>In this context, it is considered appropriate to rezone the subject lands in their entirety given their established open space setting and role they play in the provision of open space for The Glen.</p> <p><b>CE Recommendation:</b></p> <p><b>Amend Map 10</b> to change from:</p> <p>Objective RES - Existing Residential – <i>‘To protect and/or improve residential amenity’</i>.</p> <p>to</p> <p>Objective OS – Open Space – <i>‘To preserve and provide for open space and recreational amenities’</i></p>
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**CE Recommendation:**



**Draft**



**Proposed Amendment**

SD-C195-300 James  
McInerney

The submission requests the provision of a Green Belt at locations:

1. Both sides of the R120 (Newcastle to Rathcoole Road) between the existing building form covered by the Newcastle Local Area Plan and the lands to the east subject to Use Zoning Objective "EE"; and
2. Between the N7 and the Greenogue and Aerodrome Business Parks and between the Greenogue and Aerodrome Business Parks and Newcastle Village, itself defined by the boundary of the Newcastle LAP.

The submission notes that the subject lands are currently subject to Use Zoning Objective "RU" - To protect and improve rural amenity and to provide for the development of

**CE Response:**

The submission requests the provision of a green belts at various locations between the settlements of Rathcoole and Newcastle. It is requested that the land between the settlements is zoned green belt.

The subject lands are currently zoned Rural (RU) – 'To protect and improve rural amenity and to provide for the development of agriculture'. The zoning of the subject lands as objective Rural RU maintains the established visual and environmental buffer between the Rathcoole and Newcastle and restricts the development of the area for inappropriate land uses. The zoning accurately reflects the existing greenfield nature of the lands and it is acknowledged that

	<p>agriculture' and request that part of these rural lands be rezoned to Use Zoning Objective "GB" - To preserve a Green Belt between developing areas'.</p> <p>The submission highlights a number a reason in justification for this rezoning request to include the following:</p> <ul style="list-style-type: none"> <li>• Considers that the Draft Plan envisages that both Newcastle and Rathcoole will be subject to ongoing expansion up to at least 2028;</li> <li>• Newcastle and Rathcoole presently retain their own identity; Provision of the Green Belts will prevent both towns emerging into one;</li> <li>• Surrounding rural countryside is constantly under strong urban influence;</li> <li>• Provision of the Green Belts will maintain and preserve the views of Athgoe Hills, Lyons Hill and the Dublin Mountains;</li> <li>• Provision of the Green Belts will encourage development into zoned lands and brownfield underutilised lands with properly defined town boundaries; and</li> <li>• Protection of the settlement boundaries for Newcastle and Rathcoole.</li> </ul> <p>The submission also notes that Green Belts as a Use Zoning Objective were a feature in previous Development Plans and were omitted from the 2016-2022 Development Plan. Under the 2010-2016 DP, the lands north of the R120 (Newcastle to Rathcoole Road) situated between the build form in Newcastle Village and Greenogue Industrial Estate were subject to 'GB' Zoning Objective. The submission seeks the reinstatement of this zoning objective on both sides of the R120 in the new Development Plan.</p> <p>The submission highlights the core strategy figures and land capacity and points out that the rezoning of rural land to</p>	<p>the 'RU' land use zoning places a significant restriction on the possible land-uses.</p> <p>The submission queries as to why Green Belts are no longer included in the Development Plan as a specific zoning objective. It is considered that the 'RU' land use zoning is generally adequate to protect the landscape character and provide green areas between urban settlements placing a significant protection of land and restriction on the possible land-uses. Notwithstanding this, the Draft Plan recognises the particular issues of creeping urbanisation towards South Dublin's western boundary. In this regard the Draft Plan includes GI1 Objective 6:</p> <p>To collaborate with Kildare County Council to identify a common approach to a greenbelt/green spaces between the growing settlements within South Dublin and Kildare County Councils within the lifetime of the Development Plan and to advise the councillors of any such collaboration and proposed study or approach.</p> <p>It is understood that Kildare County Council will include a similar objective in their Draft Plan, subject to the input of the planning process. Furthermore, the Draft Plan provides for a Green Infrastructure Strategy for county which allows for the protection and enhancement of green spaces and corridors within the County.</p> <p>The subject lands are currently zoned rural, located outside Dublin City and Suburbs settlement boundary. The core principle of the NPF is compact urban growth through the consolidation of the exiting-built footprint of settlements. The Draft Plan prioritises the development of existing zoned lands particularly within MASP growth areas and to re-zone additional lands, especially at the periphery of the County would continue the sprawl of the urban area and it is not considered appropriate. Development which further sprawls the settlement boundary is contrary to the analysis carried out in Chapter 2 having regard to the projected population growth for the Dublin City and Suburbs settlement and parameters under of NSO 1, and NPO 3b. As such, there is no requirement to re-zone</p>
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	<p>residential land is contrary to the policies and objectives set out in the Draft Plan and indicates the adverse impacts that residential rezoning could have on 'Newcastle Burial Channel'.</p>	<p>additional land for residential purposes to meet the needs of the targeted population increase and thus household need up to 2028. It is considered that the existing RU zoning and the policies and objectives set out in the Draft Plan provide sufficient protection to the subject lands.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
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**General Zoning Submission**

<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation</b>
<p><a href="#">SD-C195-142 Commons Lane Residents</a></p>	<p>This submission relates to lands at Commons Lane, Moneenalion-Brownsbarn Townland, Baldonnell, Co. Dublin, with the purpose to retain the 'RU' land use zoning.</p> <p>The following three points are made in support of their submission for retention of RU zoning/compatible green influenced zoning:</p> <ul style="list-style-type: none"> <li>- The area is within the Casement Aerodrome Red Zone boundary and development is therefore curtailed due to safety considerations, in accordance with the standards set out in The ICAO.</li> <li>- Chapter 4 of the SDCC CDP aims to promote the development of an integrated GI network for South Dublin County working with and enhancing existing biodiversity and natural heritage, improving our resilience to climate change with several stated objectives support this, namely: GI6 Objective 9, thus, a conflicting rezoning of this area would contravene this vision.</li> <li>- Chapter 8 of the SDCC CDP addresses Community Infrastructure and Open Space, with section 8.1 focusing on</li> </ul>	<p><b>CE Response:</b></p> <p>The request to retain the RU zoning is noted. The subject lands are zoned RU 'Rural and Agricultural' in the Draft Plan where it is an objective as per Chapter 13 Implementation and Monitoring Table 13.1 'To protect and improve rural amenity and to provide for the development of agriculture'.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>

	<p>Community Infrastructure and Climate Action: The way in which the Council provides community infrastructure and open space can help us to tackle climate change by reducing our demand for energy and our carbon emissions. For example, parks and open spaces and greenways intertwined within the County's green infrastructure network offer great opportunities for carbon sequestration (capturing and storing carbon).</p> <p>COS5 Objective 11 is of specific note.</p> <p>If rezoning is to occur on site, a more appropriate zoning should be prioritised like RU to OS (Open Space), which would keep in line with the new climate action based vision of the CDP. As stated in the GI, one of the strategic corridors envisaged is Corridor 5: Camac River Corridor, which the residents of the area are proposing 50-80 acres, which would be a significant enhancement to this proposed corridor and would welcome an opportunity to discuss.</p>	
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<b>Climate Action</b>		
<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation</b>
<a href="#">SD-C195-302 Department of Public Health Service Executive</a>	<p>Submission suggests that communities within SDCC be better informed, engaged and supported in the protection and improvement of the environment, with SDCC taking a leadership role in influencing and promoting this behavior change. Sustainability and emission reduction should be considered in all development, policies and procedures.</p> <p>Submission also looks for more recreational space, co-designed green, biodiverse spaces and more planting of deciduous trees in SDCCs parks.</p>	<p><b>CE Response:</b></p> <p>The issues raised are noted. The National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) establish the importance of addressing climate action. In line with this national and regional policy provisions the strategic vision of the Draft Plan is informed by the core strategy and population targets set for the County. To achieve the overall plan vision a 'layered approach' has been applied to development with a focus on facilitating future growth in a manner which protects and enhances the County's natural cultural and built heritage, maximises opportunities for the development of the Green Infrastructure</p>



		<p>network, promotes the highest quality in urban design with the overall aim of delivering healthy places in which to live, work, visit, socialise, and invest in. Central to the achievement of this layered approach is the integration of Climate Action as a key overarching theme for all aspects of the Plan. This is further supported by the setting of targets for transport modes to influence, through policy and objectives, a change in behaviour to more active forms of travel. The policies and objectives in the Draft Plan support the strategic vision and South Dublin's leading role in sustainable development.</p> <p>With regard to Open Space, it is noted that the Draft Plan has adhered to national and international standards for public open space which are linked to distances from the home, size, quality etc. The Draft Plan allows for the provision or upgrading of small parks, local parks and neighbourhood parks outside a development site area, subject to the open space or facilities meeting the open space 'accessibility from homes' standards for each public open space type set out in Table 8.1 'Public Open Space Hierarchy'. In addition, Table 8.2 sets out standards to ensure a minimum provision of public open space on particular site, within the relevant zoning. It is also noted that Draft Plan has a range of policies and objectives related to the provision of Parks and public Open Space. In particular, Policy COS5: Parks and Public Open Space – Overarching, COS5 Objective 9 and COS5 Objective 14 are of notes.</p> <p>Furthermore, policies and objectives in the Draft Plan promote the development of an integrated GI network for South Dublin working with and enhancing existing biodiversity and natural heritage, improving our resilience to climate change and enabling the role of GI in delivering sustainable communities to provide environmental, economic and social benefits. In particular, Policy GI1 and the associated objectives seeks to protect, enhance, and further develop a multifunctional GI network which includes an</p>
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		<p>interconnected network of parks, open spaces, natural features, protected areas, trees, rivers and streams.</p> <p>It is therefore considered that the policies and objectives of the Draft Plan adequately address the issues raised.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
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## Maps

Submission No.	Submission Summary	CE response and recommendation
<a href="#">SD-C195-207 Quintain Developments Ireland Limited</a>	<p>The submission notes some minor errors in the zoning maps which would benefit from correction in the adopted Plan.</p> <p>1: It is noted that the 6-year road proposal through the centre of Adamstown Station Development Area (Map 4) shows a 6 year road proposal through the centre of the future Adamstown District Centre (see above). This site now benefits from planning permission and development will be soon underway (SDZ20A/0008, as amended). The submission highlights that further to the comprehensive pre planning discussions that took place, it was decided to omit this road proposal route from the development, and the existing planning permission is on this basis. The layout of this planning permission is shown on the zoning map, however, it is submitted that the road proposal marking should be removed, as it is not compatible with the approved planning permission.</p> <p>2: Some of the zoning maps appear not to not overlap, leaving gaps of land which are not covered by the zoning</p>	<p><b>CE Response:</b></p> <p>Item 1: Under section 169(9) of the Planning Acts, a planning scheme shall be deemed to form part of any development plan in force in the area of the scheme until the scheme is revoked, and any contrary provisions of the development plan shall be superseded. The Draft Development Plan has taken some of the details outlined in the Adamstown SDZ scheme to provide context within the county. It is considered that the Draft Plan maps clearly directs users towards the planning schemes in these areas. It is not appropriate for the Draft Plan to indicate anything within the SDZ other than that which is contained within the Scheme itself.</p> <p>Item 2: None of the zoning maps overlap. Each map abuts the next. There is a 1pt border which may be obscuring an insignificant width of data equivalent to 0.88m at 1:5000 (for context 5m is generally the smallest distance that can be accurately scaled off a printed drawing at this scale), for the final plan every effort will be made to eliminate this anomaly. It is also noted that the final Development Plan maps will be made available digitally as an interactive map which will be seamless.</p>

	map. This appears to occur between maps 1 and 4, and maps 2 and 4.	<b>CE Recommendation:</b> No change to Draft Plan
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## Appendix 2 - Infrastructure Assessment

Submission No.	Submission Summary	CE response and recommendation
SD-C195-99 Irish Water	<p>IW acknowledge the Infrastructural Assessment contained in Appendix 2A and provide a high level overview in relation same. In addition, in relation to the waste water/drainage overview provided in relation to the Tallaght Neighbourhood, IW suggest the following replacement wording, on foot of DAP surveys and an error discovered in the sewer record:</p> <p>“There will be network upgrade required to facilitate the longer term growth needs of the Cookstown area. The upgrade being potentially located in the Belgard Road/Airton Road and Bancroft Park areas. Irish Water can work with developers to form the best solution. This would be through the Connections and Developer Services section of Irish Water’s website. <a href="http://www.water.ie/connections/developer-services/">http://www.water.ie/connections/developer-services/</a>”</p>	<p><b>CE Response:</b></p> <p>The support of the Infrastructural Assessment contained in Appendix 2A of the Draft Plan is welcomed and noted.</p> <p>The submission highlights that on foot of Drainage Area Plan (DAP) surveys an error was discovered in the sewer record. As a result, it is suggested that a rewording of the Tier 2 assessment of the Tallaght Neighbourhood.</p> <p>Given that the assessment relates to Teir 2 lands which comprises of lands that are not currently sufficiently serviced to support new development but have the potential to become fully serviced within the life of the plan and the wording proposed, it is considered appropriate to change the wording as requested and it is contended that it does not impact on the Infrastructural Assessment of such lands.</p> <p><b>CE Recommendation:</b></p> <p>It is recommended to change the wording in the Tallaght Neighbourhood Teir Two Assessment Table of Appendix 2 (Part 1) ‘Developing the Core Strategy’ of the Draft Plan.</p> <p>Tallaght Neighbourhood Area – Wastewater/Drainage under Infrastructural Requirements heading on pg 27 replace wording <b>from:</b></p> <p>In Tallaght North, there are constraints around Airton Road / Cookstown where developer driven upgrades are required to</p>

		<p>support development. 450 mm sewer in Airton Road is surcharged. There is a 225 mm overflow discharging into the local waterbody. Downstream of the overflow the sewer discharges via a manhole into 600 mm sewer in Bancroft park. The 600 mm sewer in Airton Road is empty upstream of the manhole. All new developments should be connected into the 600 mm sewer.</p> <p><b>To</b></p> <p><b>There will be network upgrade required to facilitate the longer term growth needs of the Cookstown area. The upgrade being potentially located in the Belgard Road/Airton Road and Bancroft Park areas. Irish Water can work with developers to form the best solution. This would be through the Connections and Developer Services section of Irish Water's website. <a href="http://www.water.ie/connections/developer-services">http://www.water.ie/connections/developer-services</a></b></p>
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# **Chapter 3:**

## **Natural, Cultural and Built Heritage**

## Chapter 3: Natural Heritage, Cultural and Built Heritage

Natural Heritage- Dublin Mountains		
Submission No.	Submission Summary	CE response and recommendation:
SD-C195-211 Fáilte Ireland National Tourism Development Authority	<p>This submission looks to the CDP for a commitment to improve access to the Dublin Mountains with the following proposed new objective added to NCBH6:</p> <p>‘To improve access to the Dublin Mountains the Council will identify potential for improved public transport, walking and cycling routes, improved way finding, interpretation, orientation and visitor hubs, and will engage with relevant stakeholders to deliver on this infrastructure.’</p> <p>This submission recommends the inclusion of the following new objective located in NCBH6:</p> <p>‘To engage with relevant transport stakeholders to identify the potential for improved public transport, including the potential for electric buses and cycling infrastructure, to the Dublin Mountains.’</p>	<p><b>CE Response:</b></p> <p>The County Development Plan includes a range of objectives relating to access to the Dublin Mountains. The following are noted.</p> <p><b>Policy EDE19 Tourism Infrastructure</b> Support the development of a sustainable tourism industry that recognises their creational and tourism potential of the County, building on the actions in the South Dublin County Tourism Strategy, 2015 or any superseding strategy.</p> <p>EDE19 Objective 3 provides support for the Dublin Mountains Visitor Centre at The Hell Fire Club.</p> <p><b>EDE19 Objective 3</b> ‘To support the development of the Dublin Mountains Visitor Centre at Hell Fire and Massy’s Wood in accordance with permission granted by An Bord Pleanála in June 2020 or any amending permissions.’ (subject to a CE Recommendation: to amend the wording)</p> <p><b>Policy EDE20 Greenways, Trails and Loops</b> Support and facilitate the development of an integrated network of Greenways (combined off road cycle and walking routes) and Trails (walking routes) along suitable corridors, with local connections to villages and attractions and to take account of the environmental sensitivities along these corridors.</p> <p><b>Policy EDE21 Tourism and Leisure Activities</b> Support and facilitate the development of leisure activities in the County.</p>

		<p>It is further noted that all planning applications will be assessed on their merits taking all the provisions of the County Development Plan into account.</p> <p>Policies EDE23 and 24 address Public Rights of Way and Permissive Access Routes</p> <p><b>EDE24 Objective 2:</b></p> <p>'To promote and facilitate the continued development of the Dublin Mountains Way and the Wicklow Way in association with the Dublin Mountains Partnership, particularly Permissive Access Routes that provide access to regional and local networks of walking, running, hiking and mountain bike trails and other recreational facilities provided that such routes/trails and their use does not significantly impact on environmentally sensitive sites.'</p> <p><b>Public Transport</b></p> <p>The following provisions of the Sustainable Movement Chapter of the Draft Plan are also noted;</p> <p><b>SM3 Objective 15:</b> To support the enhancement of the Local Link Rural Transport Programme in order to provide the rural communities of the County with access to improved bus services.</p> <p><b>SM2 Objective 11:</b> To provide additional directional signs for major destinations, civic amenities and tourist attractions on major pedestrian and cycle routes, including references to distances, estimated times and/or number of steps to be taken.</p> <p><b>SM2 SLO 2:</b> To consider an off-road shared cycle and pedestrian path from Stocking Lane to the Hellfire Club to provide a safe alternative to cars, to access this amenity.</p> <p>The provision of public transport service is a detailed transport operational matter for bus providers i.e NTA and Local Link to consider. However, it is noted that Planning permission has been granted for the delivery of the Dublin Mountains Visitor Centre with</p>
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		<p>associated parking and transport arrangements resulting in this area being the formal visitor access point to the Dublin Mountains. In this context consideration is being given proposals for a shuttle bus from Tallaght LUAS stop and Public Transport Hub at Tallaght Town Centre, via a proposed Park &amp; Ride facility at Tallaght Stadium.</p> <p><b>CE Recommendation:</b> No change to Draft Plan</p>
<p>SD-C195-53 Hellfire Massy Residents Association</p> <p>SD-C195-109 South Dublin Conservation Society</p> <p>SD-C195-265 Deirdre tierney</p>	<p>Notes the wording of NCBH19 Objective 3 – ‘To address dereliction and to welcome, encourage and support the rehabilitation, renovation, appropriate use and sensitive re-use of Protected Structures’ and adds that this objective should restrict large scale tourism development in zoning HA/DM.</p> <p>Highlights that NCBH6 Objective 2 should prohibit new developments within the Zoning Objective HA-DM as opposed to restrict development in this designated area.</p> <p>The submission considers that NCBH6 Objective 5 should be altered to ‘prohibit new developments above the 350m contour and to consider a policy of re-wilding to restore the natural character of mountain heath.</p> <p>Amend Zoning Objective ‘HA -DM’: ‘To protect and enhance the outstanding natural character of the Dublin Mountains Area’</p>	<p><b>CE Response:</b></p> <p><b>NCBH19 Objective 3</b> relates specifically to protected structures and states as follows:</p> <p>‘To address dereliction and to welcome, encourage and support the rehabilitation, renovation, appropriate use and sensitive re-use of Protected Structures consistent with RPO 9.30 of the RSES.</p> <p>As NCBH19 Objective 3 refers specifically to Protected Structures it is considered inappropriate to add a particular restriction in relation to large scale tourism development in the HA-DM zoning, which may not necessarily relate to protected structures. A number of objectives relevant to the Dublin Mountains are stated below.</p> <p><b>Policy NCBH 6 and objectives 1-6 address the Dublin Mountain.</b></p> <p>‘Protect and enhance the visual, environmental, ecological, geological, archaeological, recreational and amenity value of the Dublin Mountains, as a key element of the County’s Green Infrastructure network.’</p> <p><b>NCBH6 Objective 2:</b> To restrict development within areas designated with Zoning Objective ‘HA –DM’ (To protect and enhance the outstanding natural character of the Dublin Mountains Area) and to ensure that new development:</p> <ul style="list-style-type: none"> <li>- does not significantly impact on sensitive habitats, species, or ecosystem services;</li> <li>- is related to the area’s amenity potential or to its use for agriculture, mountain or hill farming, and</li> </ul>



		<p>- is designed and sited to minimise environmental and visual impacts.</p> <p><b>NCBH6 Objective 5:</b> To ensure that any development above the 350-metre contour in the Dublin Mountains will seek to protect the open natural character of mountain heath, gorselands and mountain bogs.</p> <p>It is also noted that any application will be assessed against the policy and objectives of the County Development Plan and these include objectives not just in relation to Protected Structures. Objectives relating to the tourism and leisure also impact on the Dublin Mountains see policies EDE 19, 20 and 21 and related objectives.</p> <p><b>Policy EDE19 Tourism Infrastructure</b> Support the development of a sustainable tourism industry that recognises their creational and tourism potential of the County, building on the actions in the south Dublin County Tourism Strategy, 2015 or any superseding strategy.</p> <p><b>Policy EDE20 Greenways, Trails and Loops</b> Support and facilitate the development of an integrated network of Greenways (combined off road cycle and walking routes) and Trails (walking routes) along suitable corridors, with local connections to villages and attractions and to take account of the environmental sensitivities along these corridors.</p> <p><b>Policy EDE21 Tourism and Leisure Activities</b> Support and facilitate the development of leisure activities in the County.'</p> <p>The purpose of NCBH19 Objective 3 is to provide for the sensitive rehabilitation of Protected Structures in the landscape regardless of location, to as far as possible bring them back into public use and thereby protect and retain them for future generations. Policy NCBH 6 objectives 1-6 and other policies referred to above relating to greenways, trails, tourism and leisure activities provide detailed policy on the wide range of issues relevant to the Dublin Mountains.</p>
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		<p>It is further noted that all planning applications will be assessed on their merits taking all the provisions of the County Development Plan into account. It is considered that existing policy is sufficient to provide the necessary protection for the Dublin Mountains.</p> <p><b>Amend Zoning HA-DM</b></p> <p>The purpose of request to amend Zoning Objective 'HA -DM is unclear. The description of HA-DM zoning as set out in the submission reflects the Draft Plan. In the submission the reference to amending HA-DM zoning is set within the context of a reference to HCL9 Objective 2. This objective is not relevant to the Draft Plan as it was specific to Chapter 9 of the 2016-2022 County Development Plan and out of context in respect of this consultation. No further action required.</p> <p><b>CE Recommendation:</b> No change to Draft Plan</p>
<p>SD-C195-145 Moyville residents Association</p> <p>SD-C195-279 Ballyboden Tidy Towns Group</p>	<p>Supports the submission made by the Hellfire Massy Residents Association.</p> <p>A number of submissions want to see strong objectives in the plan to enhance and protect the special character of the Dublin Mountains and strong protections for the Hellfire Club, Massy's Estate and Orlagh Country House and Estate.</p>	<p><b>CE Response:</b></p> <p><b>Policy NCBH 6 and objectives 1-6</b> address the Dublin Mountains. In addition, there are a range of objectives in the Plan addressing Protected Structures as outlined below. It is important to note that any proposed development will be considered on its merits having regard to the policies and objectives of the whole Development Plan including those referred to above and stated below. It is considered that the concerns raised in the submissions are adequately addressed in the Draft Plan.</p> <p><b>Policy NCBH6</b> states:</p> <p>Protect and enhance the visual, environmental, ecological, geological, archaeological, recreational and amenity value of the Dublin Mountains, as a key element of the County's Green Infrastructure network.</p>

		<p><b>NCBH6 Objective 1:</b> To support the <i>Dublin Mountains Partnership Strategic Plan (2021-2025)</i> in conjunction with other stakeholders in order to develop co-ordinated and sustainable amenity initiatives for the wider Dublin Mountains, recognising and protecting the ecological, geological, archaeological, and cultural heritage of the Mountain landscape.</p> <p><b>NCBH6 Objective 2:</b> To restrict development within areas designated with Zoning Objective 'HA –DM' (To protect and enhance the outstanding natural character of the Dublin Mountains Area) and to ensure that new development:</p> <ul style="list-style-type: none"> <li>• does not significantly impact on sensitive habitats, species, or ecosystem services;</li> <li>• is related to the area's amenity potential or to its use for agriculture, mountain or hill farming, and</li> <li>• is designed and sited to minimise environmental and visual impacts.</li> </ul> <p><b>NCBH6 Objective 5:</b> To ensure that any development above the 350-metre contour in the Dublin Mountains will seek to protect the open natural character of mountain heath, gorselands and mountain bogs.</p> <p><b>Policy NCBH19 Protected Structures</b> states 'Conserve and protect buildings, structures and sites contained in the Record of Protected Structures and carefully consider any proposals for development that would affect the setting, special character or appearance of a Protected Structure including its historic curtilage, both directly and indirectly. Conserve and protect buildings, structures and sites contained in the Record of Protected Structures and carefully consider any proposals for development that would affect the setting, special character or appearance of a Protected Structure including its historic curtilage, both directly and indirectly.'</p> <p><b>NCBH19 Objective 2:</b></p>
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		<p>'To ensure that all development proposals that affect a Protected Structure and its setting including proposals to extend, alter or refurbish any Protected Structure are sympathetic to its special character and integrity and are appropriate in terms of architectural treatment, character, scale and form. All such proposals shall be consistent with the <i>Architectural Heritage Protection Guidelines for Planning Authorities</i>, DAHG (2011 or any superseding documents) including the principles of conservation.'</p> <p><b>NCBH19 Objective 4:</b> To support alternative uses for Protected Structures including former institutional sites in order to provide continued security of the heritage value of these buildings, attendant grounds and associated landscape features. To this end, the relaxation of site zoning restrictions may be considered in order to secure the preservation and conservation of the protected structure where the use proposed is compatible with the existing structure and where the proposed development is consistent with best practice conservation policies and the proper planning and sustainable development of the area.'</p> <p><b>CE Recommendation:</b> No change to Draft Plan</p>
<p>SD-C195-234 Development Applications Unit</p>	<p>Highlights that 2,000 ha around Glenasmole are included in the Wicklow National Park and it calls for the insertion of additional detail into section 3.3.4 'Areas of Significant Amenity Value' under heading of 'Dublin Mountains' to acknowledge that Wicklow Mountains National Park is located in South Dublin County.</p>	<p><b>CE Response:</b> The contents of the submission are noted and accepted.</p> <p><b>CE Recommendation:</b> It is recommended that the Draft Plan be amended as follows</p> <p>Section 3.3.4 Areas of Significant Amenity Value</p> <p>The County contains many key natural assets including: the Dublin Mountains, the Liffey River Valley, the Dodder River Valley, the Grand Canal, and a number of smaller river corridors including the Griffeen, Camac, and Owendoher Rivers.</p>

		<p>Amend to</p> <p>The County contains many key natural assets including: the Dublin <b>Mountains within the Wicklow Mountains National Park</b>, Liffey River Valley, the Dodder River Valley, the Grand Canal, and a number of smaller river corridors including the Griffeen, Camac, and Owendoher Rivers.</p> <p>Amend Heading 'Dublin Mountains' to Dublin Mountains and Wicklow Mountains National Park. In the first line of the paragraph following this heading replace amend the text to read <b>Dublin Mountains within the Wicklow Mountain National Park</b>.</p>
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NATURAL HERITAGE		
Submission No.	Submission Summary	CE response and recommendation:
<p><a href="#">SD-C195-171 Gary Gill</a></p> <p><a href="#">SD-C195-174 Gary Gill</a></p> <p><a href="#">SD-C195-219 BirdWatch Ireland</a></p>	<p>Submissions highlight that the Common Swifts has declined by 58% between 1998-2016 which is one of the largest declines in distribution of any Irish bird species. The use of modern building practices does not create nooks and crevices for swifts which has resulted in the loss of nest sites. Further declines are not inevitable and can be reversed if urgent action is taken at Planning Level within the timeframe of this Development Plan. South Dublin County is a huge urban area and effective action is required to save the declining populations of this urban bird.</p> <p>The introduction of built-in nest boxes such as those in public buildings in Co. Mayo have been extremely successful. It is critical that stable nesting sites are available to maintain the core populations.</p>	<p><b>CE Response:</b></p> <p>Under the County Heritage Plan, SDCC undertook a Swift survey in 2020 in conjunction with BirdWatch Ireland and local volunteers. Following one of the CE Recommendation:s in that Survey Report, a Swift Box Installation Project is planned for 2022 under the County Biodiversity Plan. Also, the South Dublin County Climate Change Action Plan contains the following objective in relation to Swift protection: E.22 In all building projects, new build or retrofit, Swift Bricks or other nesting sites for swifts will be provided where practicable. The presence of swift breeding sites will be identified to ensure that known breeding sites are not lost as a result of construction work.</p> <p>As part of the Council's Green Infrastructure Strategy, developers will be required to implement all necessary measures to create GI connections to the wider GI network (See 13.3.3 Green Infrastructure Interventions).</p> <p>One of the measures that developers will be encouraged to implement in order to enhance the GI and ecosystem services</p>

	<p>Submissions identifies where suitable swift nest products can be sourced and are an effective measure to attain biodiversity net gain.</p> <p>It is illegal under The Wildlife Act 1976 as amended to intentionally kill or cause harm to nesting bird species and best practice measures should be used when carrying out works on buildings where Swifts are nesting such as carrying out a swift survey in advance of works and limit working on buildings to outside the nesting season, no not block nest access with scaffolding or netting.</p> <p>One such submission highlights that particular attention is paid to the protection of swifts in Energy Retrofitting Schemes, as swifts prefer nesting in certain Local Authority Housing estate and it is envisaged that these will be externally insulated during the lifetime of the 2022-2028 Development Plan and therefore proper surveying and planning is required. BirdWatch Ireland have compiled a booklet outlining best practice in conserving Swift nest sites.</p> <p>The submissions further request that Local Authority's consider incorporating built-in swift bricks or externally swift nest boxes to their own public buildings over 5m high and that all new private buildings over 5m high will be required to incorporate such. it is highlighted that Kildare County Council has included such a policy in their County Development Plan requiring all new developments to identify, protect and enhance ecological features by making provision for local biodiversity.</p>	<p>provision of a site is: - The provision of bird boxes (as building façades for nesting sparrows or swift bricks), bat boxes, bee nesting boxes, hedgehog passes, and other wildlife interventions as required in landscape settings. It is considered that the provisions of the Draft Plan are sufficient in this regard.</p> <p><b>CE Recommendation:</b> No change to Draft Plan</p>
<p>SD-C195-63 Kildare County Council</p>	<p>This submission highlights the importance of the natural environment and areas of natural heritage or significant amenity value during the pandemic, with these areas often crossing borders through administrative areas. NCBH7 Objective 3 and additionally NCBH7 Objective 4 are</p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted and welcomed.</p> <p>NCBH7 Objective 3 states:</p>

	<p>supported and collaboration on each of these objectives with relevant stakeholders is welcomed.</p>	<p>To improve and extend the Liffey Valley Special Amenity Area Order along the Liffey Valley area in South Dublin from the border with Dublin City administrative area to Kildare County and promote its tourism potential subject to the protection of its biodiversity and ecological value.</p> <p>NCBH7 Objective 4 states:</p> <p>To facilitate and support the development of the Liffey Valley (Zoning Objective 'HA – LV') as an interconnected green space and park in collaboration with Dublin City Council, Fingal County Council, Kildare County Council, the OPW and other State agencies, existing landowners, community groups and sectoral and commercial interests in accordance with the Ministerial Order for the Liffey Valley SAAO by:</p> <ul style="list-style-type: none"> <li>àà Carrying out a study of the lands that comprise Liffey Valley inclusive of the Special Amenity Area Order (SAAO) and adjacent lands;</li> <li>àà Investigating and determining, as part of the study, viable and appropriate uses to support and facilitate the development of a Regional Park (Liffey Valley Park), with particular emphasis on enhancing the recreation, amenity value and accessibility of the area while protecting the valley's biodiversity and enhancing the green infrastructure network;</li> <li>àà Identifying and designating, as part of the study, possible future new pedestrian routes and footbridge locations in accordance with 'Towards a Liffey Valley Park' (2007) or any superseding plan, including potential permissive access routes.</li> </ul> <p>Universal accessibility for all should be balanced with ensuring that environmental and built heritage sensitivities are not negatively impacted upon.</p> <p><b>CE Recommendation:</b> No change to Draft Plan.</p>
<p>SD-C195-78 Recorder Residents Association</p>	<p><b>The Poddle:</b></p>	<p><b>CE Response:</b></p> <p>In respect of the uncovering of culverted waterways GI3 Objective 4 of the Draft Plan states as follows;</p>

	<p>Two concerns relating to culverting and the desire to 'open' the river are raised.</p> <p>One of three remaining 'open' stretches of the river lies within South Dublin. In line with the plans for the Flood Alleviation Scheme on the Poddle River we would aspire to maintaining the open nature of the River as an amenity for our area, which historically fed several mills in the immediate area.</p> <p>The Poddle should be protected from Culverting into the future. Reference: Schedule 1. Record of Monuments and Places. Dev. Plan 2016-2022.</p>	<p><i>'To uncover existing culverts where appropriate and in accordance with relevant river catchment proposals to restore the watercourse to acceptable ecological standards for biodiversity wherever possible improving habitat connection and strengthening the County's GI network.'</i></p> <p>Public Consultation on the Poddle flood alleviation scheme was carried out in the Spring of 2020. Significant further information was submitted to An Bord Pleanala in October 2020. The current target date for a decision from An Bord Pleanala is the 24/11/2021. As a decision on the proposed flood alleviation scheme is still awaited it is not considered appropriate to comment on its content. However, the following is noted:</p> <p>No current open section of the river will be affected under the proposed flood scheme and the open nature will be maintained and indeed, enhanced under the scheme.</p> <p>Protection from future culverting is provided by G13 Objective 4 above. A similar objective contained in the 2016-2022 CDP is referenced in the Flood Alleviation Scheme documentation.</p> <p><b>CE Recommendation:</b> No change to Draft Plan</p>
<p>SD-C195-230 Tallaght Community Council</p>	<p>A submission highlights the importance of access to wildlife areas for children and that such places are diminishing in urban areas. The 'Convention on the Rights of the Child' emphasis the importance of children's contact with nature.</p>	<p><b>CE Response:</b></p> <p>'In 2028 South Dublin will be a place that our communities are proud of, that our businesses can thrive in and that will help us to live greener and healthier lives.'</p> <p>Above is the stated vision for the County Development Plan 2022-2028. To achieve the overall plan vision a 'layered approach' has been applied to development with a focus on facilitating future growth in a manner which protect and enhances the County's natural, cultural and built heritage, maximises opportunities for the development of the Green Infrastructure network, promotes the</p>



		<p>highest quality in urban design with the overall aim of delivering healthy places in which to live, work, visit, socialise, and invest in. All of these elements are linked through the integration of Climate Action as a key overarching theme across all aspects of the Plan. At its base the County Development Plan is about the County and the people who live and work in it of all ages. At its core the Plan is about ensuring the best possible environment, opportunities and services for all. The compact growth approach is based around making best use of resources while improving the quality of our environment through place making, the protection and enhancement of our green infrastructure and providing protection and enabling the preservation of our natural and built resources. This is a huge challenge which must balance strong competing pressures on those precious resources. This approach is then translated to development on the ground through the Development Management Process. At this level the Council has policies in relation to provision of play spaces for children in new development and these are based on natural play based principles.</p> <p><b>CE Recommendation:</b> No change to Draft Plan</p>
<p><a href="#">SD-C195-213 An Taisce</a></p> <p><a href="#">SD-C195-225 An Claiómh Glas</a></p> <p><a href="#">SD-C195-57 David Build More Housing</a></p>	<p>A number of submission request that the new CDP should directly and thoroughly address the gravity of the biodiversity crisis in a manner commensurate to the way in which it addresses the climate crisis. While there is a robust suite of objectives in the Draft Plan aimed at ecological protection of both designated and non-designated areas, especially in Chapter 3, where An Taisce consider that the Draft Plan as a whole sufficiently considers the context or addresses the scale of the current biodiversity loss emergency. The submission recommends that this crisis be included alongside climate as one of the pillars of the overall CDP strategy.</p> <p>Another submission notes that the 2022-2028 County Development Plan is one of the most important plans for the County as we stand in the middle of a climate and</p>	<p><b>CE Response:</b></p> <p>A number of the submissions acknowledge that the Draft Plan includes a robust suite of biodiversity objectives NCBH2 Objectives 1-4 and GI-2 Objectives 1-4 (Chapter 4: GI Strategic Themes. These are listed below.</p> <p>The County Development Plan is a strategic landuse document and its role is to support and enable the delivery of strategic landuse objectives which reflect European and National policy. Mitigation of Climate Change is a core theme of all these policies spanning, biodiversity, green infrastructure, sustainable movement, placemaking and sustainable development through ensuring development takes place in a way that maximises our limited land resources. The Draft Plan reflects these policies at the County level, helping to enable and deliver the tangible results of the</p>

	<p>biodiversity crisis, a housing crisis and a potential global recession.</p> <p>In respect of the Habitat Directive requirement a submission notes that now that it is established in law that approval can only be granted for plans and projects when it has been established beyond all reasonable scientific doubt that the subject proposal will not adversely impact any Natura 2000 sites. These points of law regarding Appropriate Assessment must be upheld in the planning process in South Dublin. Policies NCBH 3 and associated objectives are welcomed.</p> <p>One submission comments that the CDP should support the implementation of the 14 points on the EU Biodiversity Strategy 2030 and where relevant aspects of the plan should be included as specific objectives.</p> <p>-Legally-binding EU nature restoration targets will be proposed in 2021, subject to an environmental impact assessment. By 2030, significant areas of degraded and carbon-rich ecosystems are restored; habitats and species show no deterioration in conservation trends and status; and at least 30% reach favourable conservation status or at least show a positive trend.</p> <p>- The decline in pollinators is reversed.</p> <p>-The risk and use of chemical pesticides is reduced by 50% and the use of more hazardous pesticides is reduced by 50%.</p> <p>- At least 10% of agricultural area is under high-diversity landscape features.</p>	<p>Climate Action approach on the ground in our county through the plans, projects and programmes across local authority services.</p> <p>In order to deliver this plan a 'layered approach' has been applied to the Plan preparation process with a focus on facilitating future growth in a manner which protect and enhances the County's natural cultural and built heritage, maximises opportunities for the development of the Green Infrastructure network, promotes the highest quality in urban design with the overall aim of delivering healthy places in which to live, work, visit, socialise, and invest in. All of these elements are linked through the integration of Climate Action as a key overarching theme across all aspects of the Plan. The resulting strategy based on the compact growth approach is designed to address the challenging issues around climate change, housing, sustainable development and protection of our natural environment which face us in the coming years.</p> <p>The 14 points of the EU Biodiversity Strategy which the Draft Plan supports through a range of objectives across all chapters of the Plan are EU targets and are inappropriate for direct inclusion in the Draft County Development Plan. However, section 3.3.2 of the Draft Plan acknowledges the EU Biodiversity Strategy and includes objectives in support.</p> <p>In respect of the provisions of Policy NCBH3 and related objectives the Council is aware of and takes seriously its responsibilities in this matter.</p> <p><i>'Conserve and protect Natura 2000 Sites and achieve and maintain favourable conservation status for habitats and species that are considered to be at risk through the protection of the Natura 2000 network from any plans or projects that are likely to have a significant effect on their coherence or integrity.'</i></p> <p>NCBH3 Objectives 2 and 3 specifically set out the need for plans and planning permissions to show that they do not have significant adverse effects on a European site.</p>
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	<ul style="list-style-type: none"> <li>- At least 25% of agricultural land is under organic farming management, and the uptake of agro-ecological practices is significantly increased.</li> <li>- Three billion new trees are planted in the EU, in full respect of ecological principles.</li> <li>- Significant progress has been made in the remediation of contaminated soil sites.</li> <li>- At least 25,000 km of free-flowing rivers are restored.</li> <li>- There is a 50% reduction in the number of Red List species threatened by invasive alien species.</li> <li>- The losses of nutrients from fertilisers are reduced by 50%, resulting in the reduction of the use of fertilisers by at least 20%.</li> <li>- Cities with at least 20,000 inhabitants have an ambitious Urban Greening Plan.</li> <li>- No chemical pesticides are used in sensitive areas such as EU urban green areas.</li> <li>- The negative impacts on sensitive species and habitats, including on the seabed through fishing and extraction activities, are substantially reduced to achieve good environmental status.</li> <li>- The by-catch of species is eliminated or reduced to a level that allows species recovery and conservation.</li> </ul>	<p><b>Policy G 12</b></p> <p>Strengthen the existing GI network and ensure all new developments contribute towards GI, in order to protect and enhance biodiversity across the County as part of South Dublin County Council's commitment to the National Biodiversity Action Plan 2021-2025 and the South Dublin County Council Biodiversity Action Plan, 2020-2026, the National Planning Framework (NPF) and the East Region Spatial and Economic Strategy (RSES).</p> <p><b>GI2 Objective 1:</b></p> <p>To reduce fragmentation and enhance South Dublin County's GI network by strengthening ecological links between urban areas, Natura 2000 sites, proposed Natural Heritage Areas, parks and open spaces and the wider regional network by connecting all new developments into the wider GI Network. No change to Draft Plan.</p> <p><b>GI2 Objective 2:</b></p> <p>To protect and enhance the biodiversity and ecological value of the existing GI network by protecting where feasible (and mitigating where removal is unavoidable) existing ecological features including tree stands, woodlands hedgerows and watercourses in all new developments as an essential part of the design and construction process.</p> <p><b>GI2 Objective 4:</b></p> <p>Integrate GI, and include areas to be managed for biodiversity, as an essential component of all new developments in accordance with the requirements set out in Chapter 13 Implementation and the policies and objectives of this Chapter.</p> <p>Having regard to the above and a number of other supporting objectives and policies in the Draft Plan, it is considered that the</p>
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		<p>Plan addresses the issues raised where it is within the remit of the Plan.</p> <p><b>CE Recommendation:</b> No change to Draft Plan.</p>
SD-C195-234 Development Applications Unit	<p>The submission from the Department of Housing, Local Government and Heritage welcomes and commends the approach taken to the conservation of biodiversity and natural habitat and especially its emphasis on the preservation of green infrastructure including Natura 2000 sites and proposed NHAs and other areas of biodiversity in the wider countryside and built-up areas of the county.</p>	<p><b>CE Response:</b></p> <p>Comments are noted and acknowledged.</p> <p><b>CE Recommendation:</b> No change to Draft Plan.</p>
SD-C195-225 An Cláomh Glas	<p>The 2022-2028 County Development Plan is one of the most important plans for the County as we stand in the middle of a climate and biodiversity crisis, a housing crisis and a potential global recession.</p> <p>The submission sets out that all Council decisions should take Climate and Biodiversity into account.</p>	<p><b>CE Response:</b></p> <p>The County Development Plan is a strategic landuse document and its role is to support and enable the delivery of strategic landuse objectives which reflect European and National policy. Mitigation of Climate Change is a core theme of all these policies spanning, biodiversity, green infrastructure, sustainable movement, placemaking and sustainable development through ensuring development takes place in a way that maximises our limited land resources. The Draft Plan reflects these policies at the County level, helping to enable and delivery the tangible results of the Climate Action approach on the ground in our county through the plans, projects and programmes across local authority services.</p> <p>In order to deliver this plan 'layered approach' has been applied to the Plan preparation process with a focus on facilitating future growth in a manner which protect and enhances the County's natural cultural and built heritage, maximises opportunities for the development of the Green Infrastructure network, promotes the highest quality in urban design with the overall aim of delivering healthy places in which to live, work, visit, socialise, and invest in. All of these elements are linked through the integration of Climate Action as a key overarching theme across all aspects of the Plan. The resulting strategy based on the compact growth approach is</p>

		<p>designed to address the challenging issues around climate change, housing, sustainable development and protection of our natural environment which face us in the coming years. Climate action is therefore a common theme across all areas of local authority activities including biodiversity, green infrastructure, sustainable movement, placemaking and sustainable development.</p> <p><b>CE Recommendation:</b> No change to Draft Plan.</p>
<p>SD-C195-109 South Dublin Conservation Society</p> <p>SD-C195-265 Deirdre tierney</p>	<p>Amend NCBH10 Objective 2 To ensure that the Council promptly and appropriately treats invasive species such as Japanese Knotweed, located on public lands, where notified by members or where it comes to the attention of the Council.</p> <p>NCBH10 Objective 2 should be amended, as it should not be solely reliant on the public to bring invasive species to the Councils attention and not to be only taking action where it's a threat to property.</p>	<p><b>CE Response:</b></p> <p><b>NCBH10 Objective 2</b> states as follows</p> <p><i>'To ensure that the Council promptly and appropriately treats invasive species such as Japanese Knotweed, where notified by members of the public that such species, located on public lands, pose a potential threat to property'</i>.</p> <p>It is noted that the Council is already implementing a programme of mapping and treating of Invasive Alien Species (including Japanese Knotweed) on public lands and roadways, and not just where it poses a threat to property. However, it is noted that the wording of the objective could be misinterpreted to read that it is only where notified by the public that action will be taken. It is considered that a slight amendment to the wording will better clarify the intent of the objective.</p> <p><b>CE Recommendation:</b> Amend NCBH10 Objective 2 from:</p> <p><i>To ensure that the Council promptly and appropriately treats invasive species such as Japanese Knotweed, where notified by members of the public that such species, located on public lands, pose a potential threat to property'</i></p> <p>To</p>

		<i>To ensure that the Council promptly and appropriately treats invasive species such as Japanese Knotweed, <b>including</b> where notified by members of the public that such species, located on public lands, pose a potential threat to property'</i>
SD-C195-225 An Cláomh Glas	Considers that the Liffey Valley Zoning should be protected and preserved.	<p><b>CE Response:</b></p> <p>The Draft Plan provides a wide range of policy and objectives relating to the amenity of the Liffey Valley.</p> <p><b>Policy NCBH7</b> and accompanying Objectives 1-9 address the Liffey Valley directly.</p> <p>'Protect and enhance the special amenity value of the Liffey Valley, including its landscape, visual, recreational, ecological, geological, and built heritage value, as a key element of the County's Green Infrastructure network and implement the provisions of the Liffey Valley Special Amenity Area Order (SAAO)'.</p> <p>In addition, provisions in relation to the Liffey Valley are a common theme in both the Natural, Cultural and Built Heritage and the Green Infrastructure chapters of the Draft Plan. The Liffey Valley is designated as a primary Green Infrastructure Corridor.</p> <p>Policy and Objectives contained in the Draft Plan in relation to the Liffey Valley are considered sufficient.</p> <p><b>CE Recommendation:</b> No Change to Draft Plan.</p>
SD-C195-279 Ballyboden Tidy Towns Group	<p>Sets out a number of risks and threats to the welfare and future of the rivers, habitat and their wildlife in the South Dublin County Council area.</p> <p>Seeks to work with SDCC again to review and complete the Biodiversity Study for both the Glin and Owendoher Rivers and identifies a number of proposed actions relating to this</p>	<p><b>CE Response:</b></p> <p>The Draft Plan contains strong policy on riparian corridors, mapping them for the first time. This policy responds to the Water Framework Directive and the need to ensure that water quality is</p>

	<p>study. The submission suggests that Specific Local Objectives be established to protect and improve sites for wetland habitat and such as Ballyboden Reservoir and Brittas Ponds together with other proposed key actions.</p>	<p>maintained where it is good or improved where it does not reach the relevant standards.</p> <p>Policy GI3 states:</p> <p>Protect and enhance the natural, historical, amenity and biodiversity value of the County's watercourses. Require the long-term management and protection of these watercourses as significant elements of the County's and Region's Green Infrastructure Network and liaise with relevant Prescribed Bodies where appropriate.</p> <p>Accommodate flood waters as far as possible during extreme flooding events and enhance biodiversity and amenity through the designation of riparian corridors and the application of appropriate restrictions to development within these corridors.</p> <p>In addition, there is an objective under the County Biodiversity Action Plan to undertake a County Wetland Survey. This survey will identify existing wetland assets and make CE Recommendation's for their protection and enhancement. This is a matter for the Biodiversity Action Plan.</p> <p><b>CE Recommendation:</b> No change to Draft Plan.</p>
<p>SD-C195-279 Ballyboden Tidy Towns Group</p>	<p>Rather than focus on a large scale visitor's centres in the Dublin Mountains SDCC should seek to develop a series of PODs that would assist a more sympathetic footprint in ecological terms and yet offer recreational utilities to tourists and local users.</p>	<p><b>CE Response:</b></p> <p>The Draft Plan does not preclude developments of the type described in the submission. In this regard the provisions of <b>EDE19 Objective 1</b> are noted.</p> <p><b>EDE19 Objective 1:</b> To support the development of tourism infrastructure, attractions, activities and facilities at appropriate locations subject to sensitive design and demonstrated environmental safeguards.</p> <p><b>CE Recommendation:</b></p>

		No change to Draft Plan.
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**Natural Heritage- Ecology (GI) Corridors**

Submission No.	Submission Summary	CE response and recommendation:
<p>SD-C195-31 William Lavelle</p>	<p>The current development plan applies an EE zoning to lands at Peamount/Gollierstown immediately south of the Grand Canal. However, as development on these lands is much more likely to proceed in the lifetime of the next plan, there is a need to reflect on how development will interface with the old quarry area along the Grand Canal at Gollierstown given the ecological and historical sensitivity of this area. In this regard, the Development Plan should provide for a linear park of at least 50 metre width, and preferably 100 metres width, to the south of the old quarry area.</p>	<p><b>CE Response:</b></p> <p>The preparation of a masterplan for the Grangecastle West lands is scheduled to commence in 2022.</p> <p>The Grand Canal is designated a Strategic Green Infrastructure corridor in the County (See Table 4.1 of the Draft Plan 'Strategic Green Infrastructure Corridors'). As part of the preparation of the Masterplan the interface between the Canal and Grangecastle West lands will take account of the policy and objectives of the Plan relating to Green Infrastructure. It is noted that Policy <b>NCBH9 Objective 6</b> in relation to the delivery of a greenway on the northern side of the canal between the 12<sup>th</sup> Lock and Hazelhatch:</p> <p><i>'To seek the extension of the Grand Canal Way Green Route from the 12th Lock to Hazelhatch in partnership with Waterways Ireland and Kildare County Council, as one of the priority projects of the Cycle South Dublin programme, ensuring the safeguarding and enhancement of the ecological sensitivities as identified along this section of the Canal.'</i></p> <p>The canal at this location is also a pNHA. Policy NCBH4 applies and NCBH4 Objectives 1 and 2 are particularly relevant:</p> <p><i>To ensure that any proposal for development within or adjacent to a proposed Natural Heritage Area (pNHA) is designed and sited to minimise its impact on the biodiversity, ecological, geological and landscape value of the pNHA particularly plant and animal species listed under the Wildlife Acts and the Habitats and Birds Directive including their habitats.</i></p>



		<p>NCBH4 Objective 2  <i>To restrict development within or adjacent to a proposed Natural Heritage Area to development that is directly related to the area's amenity potential subject to the protection and enhancement of natural heritage and visual amenities including biodiversity and landscapes. Such developments will be required to submit an Ecological Impact Assessment prepared by a suitably qualified professional.</i></p> <p>The policies and objectives above will inform the masterplan for Grange Castle as will the policy set out for Green Infrastructure. Noting the above the Masterplan will also have regard to policy in the County Development Plan relating to permeability, promotion of active travel and the need to protect environmental sensitivities.</p> <p><b>CE Recommendation:</b>  No change to Draft Plan.</p>
<p><a href="#">SD-C195-164 Denise Delappe</a></p>	<p>Calls for local improvements in the Dodder valley park area such as the overgrowth to be permanently cleared at the Old Bawn Bridge Waterfall to allow views by the community.</p> <p>Develop a pathway/sleeper trail on the northern bank from Bolbrook bridge to the Balrothery weir, clear back the river bank in the Dodder Park as some trees and overgrowth are covering the width of the river in some places.</p>	<p><b>CE Response:</b></p> <p>Provision of public access and active recreational amenity within public parks, that also contain sensitive landscapes and ecology has to be done in a sensitive way. Public Access and provision of recreational amenity is carefully planned in a way that concentrates activity where it has the least impact. The policies in the County Development plan supports this careful provision. Clearing of vegetation and providing access is sometimes counter productive to the protection of the environment. In some instances existing informal access can be retained but it may not be in the interests of the environment to encourage or facilitate increased access. The relevant operational sections of SDCC will consider such requests on a case by case basis.</p> <p>It is noted that the clearing of overgrowth is an operational matter for the relevant department of the Council.</p> <p><b>CE Recommendation:</b>  No change to Draft Plan.</p>

<p><a href="#">SD-C195-154 Tallaght Community Council</a></p> <p><a href="#">SD-C195-230 Tallaght Community Council</a></p>	<p>The submission requests that the Council maintain their lands to ensure safe passage along the north bank of the Whitestown Stream and Dodder towards Balrothery Weir as a Green Infrastructure link. The recent N81 landscape works disturbed and moved significant mounds of earth into this long established walkway which is contrary to the Part 8 plans.</p> <p>Requests the Council to explore all options to improve the pedestrian / cycling connector routes and linkages between Sean Walsh Park, Dodder Valley and Tymon parks along the Whitestown stream and open green space along the N81. To seek stronger over-ground routes as the current underpass system is not attractive to solo or older walkers.</p> <p>Concern expressed that the wildlife walk, the natural footpath along the west bank of the Dodder River might not be kept open for the enjoyment of those who would like to observe and photograph nature. This route is rich in woodland and ground cover vegetation and provide habitat for fox, stoat, grey squirrel, and many bird species. The Dodder itself is home to otters and water birds such as Kingfisher, heron, and grey wagtails. A portion of this walkway is obscured by landscaping and would require a little maintenance, but ultimately this walkway should remain a natural walkway for nature watchers and should not be accessed by dog walkers or cyclists.</p>	<p><b>CE Response:</b></p> <p>The stretches of waterway referred to are located along the Dodder Greenway. The Greenway has been designed to use existing paths where possible. Alternative routes were considered as part of the feasibility and preliminary design stages for the proposed Greenway. Due to a variety of constraints; the current proposed route is the most feasible one. These constraints included available space, flood risk, wildlife, habitats protected under the EU Habitats Directive among other considerations and meant that the Greenway was required to deviate from the riverside at some locations. In many cases there are paths next to the river which will still be accessible by the public should they wish to travel along the riverbank. (The consideration of alternative routes would be subject to a re-consideration of the possible impacts at that stage). In the interim the proposed route has been designed to ensure pedestrian and cycle safety and comfort and ease of use. Further enhancement of same will be carried out, where possible, at the detailed design stage to ensure universal accessibility and ease of pedestrian and cycle use. Existing paths along the river will continue to provide access along to the riverbank as outlined in the plans.</p> <p><b>CE Recommendation:</b> No change to Draft Plan.</p>
<p><a href="#">SD-C195-154 Tallaght Community Council</a></p>	<p>A submission requests engagement with all stakeholders along the Dodder to achieve shared objectives for this GI without adversely impacting on the natural ecosystem. To improve permeability and access to the Dodder for residents and visitors in a sensitive manner.</p>	<p><b>CE Response:</b></p> <p>Provision of public access and active recreational amenity within public parks, that also contain sensitive landscapes and ecology has to be done in a sensitive way. Public Access and provision of recreational amenity is carefully planned in a way that</p>

	<p>NCBH – Request new SLO – after Ob 5:</p> <p>“Work with adjacent to the public lands to ensure the enhancement of the community amenity and public parklands, creating a green corridor from Old Bawn to Kiltipper park wherever possible.”</p>	<p>concentrates activity where it has the least impact. The policies in the County Development plan supports this careful provision. In some instances existing informal access can be retained but it may not be in the interests of the environment to encourage or facilitate increased access. The relevant operational sections of SDCC will consider such requests on a case by case basis.</p> <p>In respect of the pathways along the Dodder. The Dodder Greenway has been designed to use existing paths where possible. Alternative routes were considered as part of the feasibility and preliminary design stages for the proposed Greenway; including alternative routes. Due to a variety of constraints at that location; the current proposed route is the most feasible one. These constraints included available space, flood risk, wildlife, habitats protected under the EU Habitats Directive among other considerations and meant that the Greenway was required to deviate from the riverside at some locations. In many cases there are paths next to the river which will still be accessible by the public should they wish to travel along the riverbank . (The consideration of alternative routes would be subject to a re-consideration of the possible impacts at that stage). In the interim the proposed route has been designed to ensure pedestrian and cycle safety and comfort and ease of use. Further enhancement of same will be carried out, where possible, at the detailed design stage to ensure universal accessibility and ease of pedestrian and cycle use. Existing paths along the river will continue to provide access along to the riverbank as outlined in the plans.</p> <p>Submission is requesting the insertion of a new SLO under <b>Policy NCBH8 Dodder Valley Park.</b></p> <p>The Dodder River is identified in the Draft Plan as a strategic corridor. One of the overarching objectives is to ‘provide a multi-functional GI corridor crossing and connecting the mountains, urban and rural areas and linking with other regional corridors’. Local corridors are also identified in the Draft Plan with associated objectives, including L10 – Tallaght – Dublin Mountains Link. The</p>
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		<p>existing green corridor from Oldbawn to Kiltipper, functions as a strong ecological corridor. The Council will engage with landowners as appropriate and where necessary to further the objectives of the GI Strategy.</p> <p><b>CE Recommendation:</b> No change to Draft Plan.</p>
<p>SD-C195-154 Tallaght Community Council</p>	<p>Request NEW SLO after Ob 6</p> <p>“To create a system of sensitive riverbank clearings to enable accessible views and sensory experiences onto the Dodder for all park users.”</p>	<p><b>CE Response:</b></p> <p>Submission is requesting the insertion of a new SLO under <b>Policy NCBH8 Dodder Valley Park</b></p> <p>‘Protect and enhance the visual, recreational, environmental, ecological, geological and amenity value of the Dodder Valley, as a key element of the County’s Green Infrastructure network.’</p> <p>The proposed new Objective to state as follows;</p> <p>“To create a system of sensitive riverbank clearings to enable accessible views and sensory experiences onto the Dodder for all park users.”</p> <p>Provision of public access and active recreational amenity within public parks, that also contain sensitive landscapes and ecology has to be done in a sensitive way. Public Access and provision of recreational amenity is carefully planned in a way that concentrates activity where it has the least impact. The policies in the County Development plan supports this careful provision. Clearing of vegetation and providing access is sometimes counter productive to the protection of the environment. In some instances existing informal access can be retained but it may not be in the interests of the environment to encourage or facilitate increased access. The relevant operational sections of SDCC will consider such requests on a case by case basis.</p> <p>It is noted that a new objective has been recommended by the Chief Executive within the chapter on GI, which follows, which</p>

		<p>takes account of the submission and other proposed objectives on views and sensory experience of rivers as follows:</p> <p>To support appropriate human engagement including the sensory experience of rivers and waterways, through access to viewing points and fishing spots, having regard to the primary need for environmental and biodiversity protection</p> <p><b>CE Recommendation:</b> No change to Draft Plan.</p>
<p><a href="#">SD-C195-213 An Taisce</a></p>	<p>An Taisce welcomes the consideration in the Draft Plan of creating an integrated green network in the Liffey Valley. The submission adds that the creation of a high quality walking and cycling Liffey Valley greenway be adopted by the Council as a major strategic objective for Implementation within a three-year period. An Taisce recommends linking Chapelizod, there use of the Farmleigh metal river bridge to provide a north bank connection from Palmerston, continuing through Waterstown Park, and proceeding under the M50 to Lucan village through the Kings Hospital, St Edmondsbury and other lands. It is also noted that this could also be part of a larger Liffey Valley route extending to Leixlip via St Catherine's Park and to Celbridge via Castletown.</p>	<p><b>CE Response:</b></p> <p>In respect of the creation of a Liffey Valley green network the following policies and objectives of the Draft Plan are noted</p> <p><b>Policy NCBH7</b> Protect and enhance the special amenity value of the Liffey Valley, including its landscape, visual, recreational, ecological, geological, and built heritage value, as a key element of the County's Green Infrastructure network and implement the provisions of the Liffey Valley Special Amenity Area Order (SAAO).</p> <p><b>NCBH7 Objective 4:</b> To facilitate and support the development of the Liffey Valley (Zoning Objective 'HA – LV') as an interconnected green space and park in collaboration with Dublin City Council, Fingal County Council, Kildare County Council, the OPW and other State agencies, existing landowners, community groups and sectoral and commercial interests in accordance with the Ministerial Order for the Liffey Valley SAAO by:</p> <ul style="list-style-type: none"> <li>• Carrying out a study of the lands that comprise Liffey Valley inclusive of the Special Amenity Area Order (SAAO) and adjacent lands;</li> <li>• Investigating and determining, as part of the study, viable and appropriate uses to support and facilitate the development of a Regional Park (Liffey Valley Park), with particular emphasis on enhancing the recreation, amenity value and accessibility of the area while protecting the</li> </ul>

		<p>valley's biodiversity and enhancing the green infrastructure network;</p> <ul style="list-style-type: none"> <li>Identifying and designating, as part of the study, possible future new pedestrian routes and footbridge locations in accordance with '<i>Towards a Liffey Valley Park</i>' (2007) or any superseding plan, including potential permissive access routes. Universal accessibility for all should be balanced with ensuring that environmental and built heritage sensitivities are not negatively impacted upon.</li> </ul> <p><b>NCBH19 SLO 1:</b> To pursue the development of an inter-county greenway through support for the refurbishment and re-use of the metal (silver) bridge in Palmerstown (the Lower Road, RPS ref. 006) which is in the ownership of Fingal County Council and to promote its usage into the sustainable movement infrastructure of the County through the Council actively seeking direct access to and enhanced enjoyment of this structure through the acquisition of lands in private ownership within South Dublin to facilitate public use and enable connections between Fingal and South Dublin and Dublin City.</p> <p>It is considered that these policy and objectives are sufficient to address the intentions of the submission.</p> <p><b>CE Recommendation:</b> No change to Draft Plan.</p>
<p>SD-C195-225 An Claiomh Glas</p>	<p>Urges caution in regard to NCBH 19 SLO1 and the development of an inter county greenway. While the sustainable movement objective is supportive caution must be taken to ensure the protection of biodiversity in this area.</p>	<p><b>CE Response:</b></p> <p><b>NCBH19 SLO 1</b> states as follows; To pursue the development of an inter-county greenway through support for the refurbishment and re-use of the metal (silver) bridge in Palmerstown (the Lower Road, RPS ref. 006) which is in the ownership of Fingal County Council and to promote its usage into the sustainable movement infrastructure of the County through the Council actively seeking direct access to and enhanced enjoyment of this structure through the acquisition of</p>

		<p>lands in private ownership within South Dublin to facilitate public use and enable connections between Fingal and South Dublin and Dublin City.</p> <p>The Council acknowledges the need to protect biodiversity in the development and construction of greenways. The Draft Plan includes a range of objectives providing for same.</p> <p><b>GI6 Objective 5:</b> To support the provision of new walkways and cycleways in suitable locations to improve the recreational amenity of GI corridors in a manner that does not compromise the ecological functions of the corridors.</p> <p><b>Policy EDE20 Greenways, Trails and Loops</b> Support and facilitate the development of an integrated network of Greenways (combined off road cycle and walking routes) and Trails (walking routes) along suitable corridors, with local connections to villages and attractions and to take account of the environmental sensitivities along these corridors.</p> <p><b>EDE20 Objective 1:</b> To support and facilitate the development of an integrated network of Greenways, Greenway Loops and Urban Greenways to encourage active travel across the County, subject to environmental considerations.</p> <p><b>SM2 Objective 14:</b> To ensure that all walking and cycling routes have regard to environmental conditions and sensitivities including biodiversity, protected species and designated sites and to incorporate appropriate avoidance and mitigation measures as part of any environmental assessments</p> <p><b>CE Recommendation:</b></p>
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		No Change to Draft Plan.
<a href="#">SD-C195-154 Tallaght Community Council</a>	<p>Request NEW SLO</p> <p>“To explore all opportunities to develop heritage trails and celebrate the milling heritage from Kiltipper to Balrothery. And to celebrate this heritage through public art in the linear park.”</p>	<p><b>CE Response:</b></p> <p>Submission is requesting the insertion of a new SLO under <b>Policy NCBH8 Dodder Valley Park</b></p> <p>The issue raised in this submission is addressed by EDE20 Objective 2</p> <p>‘To support the development of local tourist and heritage trails at suitable locations including across the Dublin Mountains, and between and within Brittas-Saggart-Rathcoole; Clondalkin; Lucan; Newcastle-Lyons; Rathfarnham; and Tallaght and seek to make such trails interactive through the use of sensitive signage and the further development of mobile application software ensuring in HA DM that all such trails are sensitively landscaped and designed to ensure positive impact on biodiversity and visual amenity.</p> <p><b>CE Recommendation:</b> No Change to Draft Plan.</p>
<a href="#">SD-C195-154 Tallaght Community Council</a>	<p><b>NEW SLO</b></p> <p>“Dodder Valley Linear park connects to Sean Walsh Park along the – to enhance this GI route along the Avonbeg road and increase the movement to include cycling’.</p>	<p><b>CE Response:</b></p> <p>Submission is requesting the insertion of a new SLO under <b>Policy NCBH8 Dodder Valley Park</b></p> <p>The Dodder greenway project is one of a number of projects being delivered under Cycle South Dublin. Elements of this project have been delivered with further section of the Dodder Greenway, relevant to this submission, is currently at design stage..</p> <p><b>CE Recommendation:</b> No Change to Draft Plan.</p>
<a href="#">SD-C195-154 Tallaght Community Council</a>	<b>NEW SLO</b>	<b>CE Response:</b>



	<p>“To scope a passive recreation tow path / sleeper trail on the North bank from Bolbrook bridge to Balrothery weir.” (GI New Corridor Working Group).</p>	<p>The submission is requesting the insertion of a new SLO under <b>Policy NCBH8 Dodder Valley Park</b></p> <p>Provision of public access and active recreational amenity within public parks, that also contain sensitive landscapes and ecology has to be done in a sensitive way. Public Access and provision of recreational amenity is carefully planned in a way that concentrates activity where it has the least impact. The policies in the County Development plan supports this careful provision. Clearing of vegetation and providing access is sometimes counter productive to the protection of the environment. In some instances existing informal access can be retained but it may not be in the interests of the environment to encourage or facilitate increased access. The relevant operational sections of SDCC will consider such requests on a case by case basis.</p> <p><b>CE Recommendation:</b> No change to Draft Plan.</p>
<p>SD-C195-154 Tallaght Community Council</p>	<p>Add SLO: To prepare a design for Watergate bridge and Bolbrook bridges over the Whitestown stream, as a historic waterway, in a prominent position along the N81, enhancements to install a traditional treatment will help improve the amenity value of the waterway and the gateways to the village ACA and the Dodder Greenway in Tallaght.</p>	<p><b>CE Response:</b></p> <p>Submission is requesting the insertion of a new SLO under <b>Policy NCBH8 Dodder Valley Park</b></p> <p>The issue raised is not a matter for the County Development Plan. It is more relevant to the Public Realm Department of the Council or TII given their remit in respect of the N81. The Development Plan has no role in the procurement of works such as those referred to. It is also noted that the Council is currently progressing a traffic management study of the N81 which will include consideration of provisions to facilitate ease of pedestrian and cycle movement.</p> <p><b>CE Recommendation:</b> No change to Draft Plan.</p>
<p>SD-C195-154 Tallaght Community Council</p>	<p>Request NEW SLO:</p>	<p><b>CE Response:</b></p>

	<p>“To scope the public realm of the underground pedestrian walkways (across Balrothery Cross / interchange to encourage more East – West, North - South movement by bike, pedestrians.”</p>	<p>Submission is requesting the insertion of a new SLO under <b>Policy NCBH8 Dodder Valley Park</b></p> <p>The Council is currently progressing a traffic management study of the N81 which will include consideration of provisions to facilitate ease of pedestrian and cycle movement. In addition, under the provisions of the County Pollinator Plan there are ongoing projects in the area to provide connections across the area to the Dodder Greenway. The advancement of any project to improve public realm at this location will be an operational matter for the County Pollinator Plan and the Public Realm Department of the Council.</p> <p><b>CE Recommendation:</b> No change to Draft Plan.</p>
<p>SD-C195-279 Ballyboden Tidy Towns Group</p>	<p>Refers to the Natural Linkages indicated in the SDCC Ballyboden Village Area Masterplan adopted in July 2006 and highlights the benefits from this inspirational piece and calls for such maps to be replicated throughout the County Plan together with other proposed actions. It is submitted that Glendoher Park would not exist ecologically on its own and that its natural linkages and green infrastructure are imperative.</p>	<p><b>CE Response:</b></p> <p>The natural linkages referred to in the submission and which highlights the importance of linking natural elements across the County were based on the same principle as the Green Infrastructure Strategy set out in Chapter 4 of the Draft Plan. The purpose of the GI Strategy is to strengthen existing GI Core Areas and Corridors within the County and to ensure that all new development incorporates and supports these GI elements, seeking ultimately to link the entire county through this network with each site potentially providing a stepping stone to create or strengthen a GI Connection.</p> <p>It is considered that the green infrastructure strategy and associated local corridors, cores and stepping stones sets out policy and objectives to support the principle of the submission. It is also noted that the Draft Plan contains an objective to prepare a LAP for Ballyboden which would look at green connections in more detail.</p> <p><b>CE Recommendation:</b> No change to Draft Plan.</p>

Natural Heritage- Natura-pNHA Designations		
Submission No.	Submission Summary	CE response and recommendation:
SD-C195-23 Gary Tyrrell	The submission looks for proper monitoring and protections for SAC's, SPA's and pNHA's.	<p><b>CE Response:</b></p> <p>In respect of monitoring and protection for SAC's, SPA's and pNHA's the provisions of Policy NCBH3 and related objectives are relevant and are considered sufficient.</p> <p><i>Conserve and protect Natura 2000 Sites and achieve and maintain favourable conservation status for habitats and species that are considered to be at risk through the protection of the Natura 2000 network from any plans or projects that are likely to have a significant effect on their coherence or integrity.</i></p> <p>However, the monitoring of the condition of sites is the remit of National Parks and Wildlife Service.</p> <p>The Draft Plan contains objectives to ensure that land use, insofar as it is within the remit of the County Development Plan, will not have an adverse impact on the integrity of any Natura site. This is reflecting requirements for their protection under legislation.</p> <p><b>NCBH3 Objective 1:</b> To prevent development and activities that would adversely affect the integrity of any Natura 2000 site located within or adjacent to the County and promote the favourable conservation status of the habitats and species integral to these sites.</p> <p><b>NCBH3 Objective 2:</b> To ensure that plans, including land use plans, will only be adopted, if they either individually or in combination with existing and/or proposed plans or projects, will not have a significant adverse effect on a European Site, or where such a plan is likely or might have such a significant effect (either alone or in combination), South Dublin County Council will, as required by law, carry out an</p>

		<p>appropriate assessment as per requirements of Article 6(3) of the Habitats Directive 92/43/EEC of the 21 May 1992 on the conservation of natural habitats and of wild fauna and flora, as transposed into Irish legislation. Only after having ascertained that the plan will not adversely affect the integrity of any European site, will South Dublin County Council adopt the plan, incorporating any necessary mitigation measures. A plan which could adversely affect the integrity of a European site may only be adopted in exceptional circumstances, as provided for in Article 6(4) of the Habitats Directive as transposed into Irish Legislation.</p> <p><b>NCBH3 Objective 3:</b> To ensure that planning permission will only be granted for a development proposal that, either individually or in combination with existing and/or proposed plans or projects, will not have a significant adverse effect on a European Site, or where such a development proposal is likely or might have such a significant adverse effect (either alone or in combination), the planning authority will, as required by law, carry out an appropriate assessment as per requirements of Article 6(3) of the Habitats Directive 92/43/EEC of the 21 May 1992 on the conservation of natural habitats and of wild fauna and flora, as transposed into Irish legislation. Only after having ascertained that the development proposal will not adversely affect the integrity of any European site, will the planning authority agree to the development and impose appropriate mitigation measures in the form of planning conditions. A development proposal which could adversely affect the integrity of a European site may only be permitted in exceptional circumstances, as provided for in Article 6(4) of the Habitats Directive as transposed into Irish legislation.</p> <p><b>CE Recommendation:</b> No change to Draft Plan.</p>
SD-C195-53 Hellfire Massy Residents Association	The submission expresses the desire to include Massey's Wood as a pNHA in Table 3.2 of the Plan.	<b>CE Response:</b>

		<p>The designation of pNHA's is a function of the National Parks and Wildlife Service and is not a local authority function, therefore the inclusion of Massey's Wood as a pNHA is outside the remit of the County Development Plan.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
SD-C195-234 Development Applications Unit	<p>The submission from the DHLGH has identified that Brittas Ponds which are part of the Slade of Saggart and Crooksling Glen proposed Natural Heritage Area (pNHA) are a Wildlife Sanctuary, Code WFS-18, where the shooting of game birds is not allowed due to their exclusion from the Open Season Order under the Wildlife Acts, 1976 to 2018. Their designation should be referred to in Section 3.3.3.</p>	<p><b>CE Response:</b></p> <p>It is considered that the Draft Plan should be amended as suggested.</p> <p><b>CE Recommendation:</b></p> <p>It is recommended that the Draft Plan should be amended as follows;</p> <p>Insert text to Section 3.3.3 under the heading Proposed Natural Heritage Areas at the end of the first paragraph as follows;</p> <p><b>Brittas Ponds which are part of the Slade of Saggart and Crooksling Glen proposed Natural Heritage Area (pNHA) are a Wildlife Sanctuary, Code WFS-18, where the shooting of game birds is not allowed due to their exclusion from the Open Season Order under the Wildlife Acts, 1976 to 2018.</b></p>
SD-C195-279 Ballyboden Tidy Towns Group	<p>The submission requests that the plan recognises the interconnection between the industrial heritage of the past (rivers and mill races) and the ecological and hydrological corridors that connect Natura 2000 sites in Dublin Bay and the Uplands and that with respect to any development that has such milling or such a watercourse, the distance of the site to the source of its must be identified and assessed in a similar way as if it was located within a Natura 2000 site.</p>	<p><b>CE Response:</b></p> <p>It should be noted that every planning application is required to be screened for impact on Natura Sites.</p> <p><b>Objective Policy NCBH 3 Objective 2 and 3</b></p> <p>All ecological and hydrological corridors within and between Natura 2000 sites and proposed development sites are assessed as part of the Appropriate Assessment process, to determine the potential for impact on the qualifying interests of identified protected</p>

		<p>sites. This requirement is reflected in Policy NCBH 3 (Objectives NCBH 1, NCBH 2, and NCBH 3).</p> <p>While the potential industrial heritage aspect of such corridors can be recognised and assessed under its own merit, it does not feature as an element for assessment under the Appropriate Assessment process under the Habitats Directive.</p> <p><b>CE Recommendation:</b></p> <p>No Change to Draft Plan.</p>
<p><a href="#">SD-C195-122 The King's Hospital School</a></p>	<p>The submission details that the northern boundary of The King's Hospital School is covered by two ecological / environmental designations: the Liffey Valley Special Area Amenity Order (SAAO) and the proposed Natural Heritage Area (pNHA).</p> <p>The submission also highlights that the SAAO extends significantly further into the campus than the pNHA. The SAAO includes land that is principally in hardstanding or playing pitches. The submission describes that the outline of the existing pitches can be seen within the SAAO boundary in the current Development Plan (2016-2022) Map Sheet 2 but is not clear on the Draft Plan maps.</p> <p>Is also submitted that little existing vegetation exist in comparison to land to the north of the playing pitches and states that the pNHA boundary is more recent delineation compared to the 1990 SAAO boundary. The submission argues that the pNHA boundary follows the northern outline of the existing playing pitches which is more reflective of the lands of ecological value at the campus.</p> <p>Therefore, the submission requests that the SAAO boundary is amended to align with the pNHA boundary as to provide</p>	<p><b>CE Response:</b></p> <p>It is noted that the objectives for both the pNHA and the SAAO overlap in their intent to protect ecological assets and features. However, the SAAO designation goes further recognizing the wider amenity value of the landscape. It also, aims to protect the overall visual landscape of the Liffey Valley, ensuring that development proposals do not impact on the wider visual and cultural assets of this area. It would not be considered appropriate to amend the SAAO boundary given its wider intent and furthermore, it would be subject to a separate process under Part XIII of the Planning and Development Acts.</p> <p>It is noted that the submission looks to show the delineation of the pitches within the SAAO area. This is considered appropriate and will bring in a more detailed base layer for the whole county.</p> <p><b>CE Recommendation:</b></p> <p>Amend the Draft Plan maps to provide for detail to outline playing pitches and other delineations as part of the most recent ordnance survey mapping.</p>

	important clarification on the lands that warrant protection, and those that are in active use for sporting activities.	
SD-C195-122 The King's Hospital School	<p>Refers to policy NCBH4 Objective 2 which states that the Council will:</p> <p>'restrict development within or adjacent to a proposed Natural Heritage Area to development that is directly related to the area's amenity potential subject to the protection and enhancement of natural heritage and visual amenities including biodiversity and landscapes. Such developments will be required to submit an Ecological Impact Assessment prepared by a suitably qualified professional.'</p> <p>While the submission supports its principle, the submission also requests, that Policy NCBH4 Objective 2 acknowledges the need to balance the operational requirements of longstanding and low impact existing uses. The King's Hospital School has operated from its campus prior to the SAAO and pNHA designations. The submission states that it is essential that these designations do not preclude the necessary improvements to educational and sporting facilities at the campus.</p>	<p><b>CE Response:</b></p> <p>It is recognised that the King's Hospital has operated in Palmerstown as a school since the 1970s and has a large campus on the southern side of the Liffey Valley, the northern element of which is within the SAAO, including Brooklawn House, a protected structure.</p> <p>The pNHA is a designation given by the National Parks and Wildlife Service. The Liffey Valley SAAO has been in place since the 1990s. Education is a use permitted in principle within the zoning HA-LV where the school is located. As such any proposed development will be considered on its merits subject to the need to protect the SAAO and the pNHA. It is considered that both designations are appropriate given the sensitive nature of the location.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
SD-C195-109 South Dublin Conservation Society	NCBH8 Objective 5 should be strengthened to add the Old Bawn Bridge to Fort Bridge stretch of the Dodder to the pNHA.	<p><b>CE Response:</b></p> <p>The designation of pNHA's is not a local authority function. therefore the inclusion of Old Bawn Bridge to Fort Bridge as a pNHA in Table 3.2 of the Plan would be outside the remit of the County Development Plan and have no effect.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
SD-C195-265 Deirdre tierney	The council only has 3 Natura 2000 sites and 5 proposed Natural Heritage Areas, with a need for the council to be more proactive in protecting identified annex habitats by	<p><b>CE Response:</b></p>

	<p>designation as the application process is relatively simple and the council can do so. This is in line with and supports the climate change objectives of NCBH2 Objective 3, GI1 Objective 3 and Policy NCBH 5</p>	<p>It is noted that Natura Sites are EU designations. The Council has no remit in this regard.</p> <p>pNHAs are proposed by the National Parks and Wildlife Service and are given policy protection through the County Development Plan.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
<p>SD-C195-279 Ballyboden Tidy Towns Group</p>	<p>Highlights the need to protect those areas known as Zones of Influence (ZOIs) that abut/affect Natura 2000 sites and NHAs.</p>	<p><b>CE Response:</b></p> <p>Policy on proposed Natural Heritage Areas are set out in Section 3.3.3 of the Draft Plan</p> <p><b>Policy NCBH4</b> states as follows;</p> <p><i>Protect the ecological, visual, recreational, environmental and amenity value of the County's proposed Natural Heritage Areas and associated habitats and species.</i></p> <p><b>NCBH4 Objective 1:</b></p> <p><i>To ensure that any proposal for development within or adjacent to a proposed Natural Heritage Area (pNHA) is designed and sited to minimise its impact on the biodiversity, ecological, geological and landscape value of the pNHA particularly plant and animal species listed under the Wildlife Acts and the Habitats and Birds Directive including their habitats.</i></p> <p><b>NCBH4 Objective 2:</b></p> <p><i>To restrict development within or adjacent to a proposed Natural Heritage Area to development that is directly related to the area's amenity potential subject to the protection and enhancement of natural heritage and visual amenities including biodiversity and landscapes. Such developments will be required to submit an Ecological Impact Assessment prepared by a suitably qualified professional.</i></p>



		<p>Policy and objectives are also contained within the Plan on Natura sites under Policy NCBH3: Natura 2000 Sites</p> <p><i>Conserve and protect Natura 2000 Sites and achieve and maintain favourable conservation status for habitats and species that are considered to be at risk through the protection of the Natura 2000 network from any plans or projects that are likely to have a significant effect on their coherence or integrity.</i></p> <p>It is considered that the Draft Plan adequately addresses the issue raised.</p> <p><b>CE Recommendation:</b></p> <p>No Change to Draft Plan.</p>
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Natural Heritage- Trees		
Submission No.	Submission Summary	CE response and recommendation:
<p>SD-C195-43 Elizabeth Davidson</p> <p>SD-C195-145 Moyville residents Association</p> <p>SD-C195-154 Tallaght Community Council</p> <p>SD-C195-53 Hellfire Massy Residents Association</p>	<p>A number of submissions have requested that Tree Preservation Orders are placed on specific trees in the County and considered for the inclusion in Table 3.3 of the Draft Plan as proposed TPOs, such as:</p> <ul style="list-style-type: none"> <li>- Massy's Wood,</li> <li>- The significant Oak Tree located in the green space known as 'Dolly's Field' within Moyville.</li> <li>- St Maelruains Tree, The Priory, Tallaght, Fir trees on TUD Tallaght campus, Fir trees on Molloy's car park, Oak Tree on Kiltalawn House gardens.</li> </ul> <p>Highlights that Massey's Wood should be included in the Tree Preservation Order on Table 3.3 and that it could be</p>	<p><b>CE Response:</b></p> <p>There are numerous objectives and policies in the draft Plan to protect rural character, heritage features and biodiversity. These are set out in the Natural, Cultural and Built Heritage Chapter 3 of the Plan and are supported by objectives throughout the Plan. These include the overarching policy NCBH 1:</p> <p><b>Policy NCBH11 Tree Preservation Orders and Other Tree Protections</b> states as follows;</p> <p><i>Review Tree Preservation Orders (TPO) within the County and maintain the conservation value of trees and groups of trees that are the subject of a Tree Preservation Order while also recognising the value of and protecting trees and hedgerows which are not subject to a TPO.</i></p>

<p><a href="#">SD-C195-265 Deirdre tierney</a></p>	<p>included as a proposed TPO in a similar fashion to the pNHA to facilitate its assessment and inclusion as a formal order.</p> <p>Request Rathcoole Woodlands and the Beech Trees on Fitzmaurice Road in Rathcoole are subjects of Tree Preservation Orders as a forerunner to applying for SAC designation or as nature reserve.</p> <p>The council need to actively show how and when the review of TPO's will be undertaken and the outcome for NCBH 11 Objective 2.</p>	<p>NCBH11 Objective 1 and 2 directly relate to Tree Preservation Orders and Protection of Trees.</p> <p><b>NCBH11 Objective 2:</b> states as follows:</p> <p><i>To regularly evaluate and identify trees of amenity value within the County with a view to making them the subject of Tree Preservation Orders or otherwise protecting them and further, to furnish information to the public in this regard.'</i></p> <p>Provision for the making of Tree Preservation Orders is set out under section 205 of the Planning and Development Acts. It is a separate procedure to the making of a Development Plan and TPOs cannot be made under the Development Plan process. It is also considered that to make a TPO requires an expert assessment of the trees being proposed, such an assessment has not been carried out and would be part of any review of TPOs.</p> <p>For convenience to applicants for planning permission and other stakeholders, a list of TPOs which have been included in the Heritage Chapter of the Plan.</p> <p>:</p> <p>The review of TPO's will be carried out in compliance with the Tree Management Strategy of the Council.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
<p><a href="#">SD-C195-109 South Dublin Conservation Society</a></p>	<p>Amend existing objective</p>	<p><b>CE Response:</b></p> <p><b>NCBH4 Objective 2</b> states as follows;</p>

	<p>NCBH4 Objective 2, pNHA and adjacent lands could be used for tree nursery or be converted to native woodlands or derelict buildings could be restored with minimal impacts.</p>	<p>'To restrict development within or adjacent to a proposed Natural Heritage Area to development that is directly related to the area's amenity potential subject to the protection and enhancement of natural heritage and visual amenities including biodiversity and landscapes. Such developments will be required to submit an Ecological Impact Assessment prepared by a suitably qualified professional'.</p> <p>The purpose of this objective is to ensure that development on lands adjacent or within any pNHA does not conflict with the designation to ensure protection of the pNHA.</p> <p>Any proposed development such as the one suggested would be assessed on its merits in accordance with the policy and objectives of the plan and in accordance with the pNHA designation.</p> <p>The proposed amendment is not considered appropriate.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<p>SD-C195-109 South Dublin Conservation Society</p>	<p>NCBH11 Objective 3 where retention is not possible, amend to include 'that equivalent carbon sequestration should be put in place, where one mature tree is felled that 15 immature trees are planted.</p>	<p><b>CE Response:</b></p> <p>The provisions of Section 13.3.2 of the Draft Plan are noted. This section requires that all planning applications demonstrate how they contribute to the protection or enhancement of Green Infrastructure in the County through the provision of green infrastructure elements as part of the application. The section also requires the submission of a Green Infrastructure Plan for the site in addition to the Landscape Plan and requires the submission of an overall site summary quantifying the extend of tree and hedgerow removal, retention and additional tree and hedgerow planting.</p>

		<p>GI5 Objective 3 also includes as part of the objective that the Council recognises the value of mature trees in terms of carbon sequestration and amenity over saplings.</p> <p>Specifications and details in relation to replacement of trees is a matter for the Public Realm Department of the Council.</p> <p>Notwithstanding this, it would be inappropriate to specify exact replacement requirements as each proposal is assessed on a case by case basis.</p> <p><b>CE Recommendation:</b></p> <p>No Change to Draft Plan.</p>
SD-C195-109 South Dublin Conservation Society	Add Objective to NCBH6: To encourage a switch from sheep farming to native woodlands in the Dublin Mountains as farming can be destructive to ecology.	<p><b>CE Response:</b></p> <p>The content of the submission is noted, however from a wider cultural, landscape management and economic point of view it important to facilitate farming in mountain areas. There are number of objectives supporting tree planting and an increase in tree cover in the Draft Plan.</p> <p>Notwithstaning, this is a detailed agricultural land management issue is outside the remit of the County Development Plan.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
SD-C195-265 Deirdre tierney	Seeks the protection by specific objectives and actions with measurable outcomes in the Draft Plan to ensure the preservation and enhancement of Burgage Hedgerows in Newcastle and Rathcoole.	<p><b>CE Response:</b></p> <p>This issue is addressed in <b>GI2 Objective 5</b> which states as follows;</p> <p>To protect and enhance the County's hedgerow network, in particular hedgerows that form townland, parish and barony boundaries recognising their historic and cultural importance in addition to their ecological importance and increase hedgerow coverage using locally native species including a commitment for no</p>

		<p>net loss of hedgerows on any development site and to take a proactive approach to protection and enforcement.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
SD-C195-23 Gary Tyrrell	Only native woodlands should be planted in the County.	<p><b>CE Response:</b></p> <p>A requirement that only native species of trees are planted in the County is overly restrictive. However, the Draft Plan contains comprehensive policy on trees, including retention, replacement and an increase in tree cover across the county and supports native tree planting. The first bullet point of GI5 Objective 3 states:</p> <p><i>To ensure compliance with the South Dublin Climate Change Action Plan and the provisions of the Council's Tree Management Strategy.</i></p> <p><i>àà Increase the County's tree canopy cover by promoting annual planting, maintenance preservation and enhancement of trees, woodlands and hedgerows within the County using locally native species and supporting their integration into new development.</i></p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
SD-C195-154 Tallaght Community Council	Highlights that hedgerows should be protected above 120 metre contour line on mountain and requests clarification on where this falls on Tallaght hill / Kiltipper The submission also welcomes NCBH6 Objective 7.	<p><b>CE Response:</b></p> <p>The Draft Plan includes a range of objectives relating to the protection of biodiversity across the County including trees and hedgerows. The provisions of the following objectives of the Plan are noted;</p> <p><b>NCBH4 Objective 3:</b></p> <p>To ensure that intact hedgerows/trees will be maintained above the 120m contour line within the County ensuring that the strong rural character will not be diluted and that important heritage features &amp; potential wildlife corridors are protected.</p>

		<p><b>GI2 Objective 5</b> 'To protect and enhance the County's hedgerow network, in particular hedgerows that form townland, parish and barony boundaries recognising their historic and cultural importance in addition to their ecological importance and increase hedgerow coverage using locally native species including a commitment for no net loss of hedgerows on any development site and to take a proactive approach to protection and enforcement.'</p> <p><b>GI1 Objective 1:</b></p> <p>To establish a coherent, integrated and evolving GI Network across South Dublin County with parks, open spaces, hedgerows, trees including public street trees and native mini woodlands (Miyawaki-Style), grasslands, protected areas and rivers and streams and other green and blue assets forming strategic links and to integrate and incorporate the objectives of the GI Strategy throughout all relevant land use plans and development in the County.</p> <p>It is considered that the provisions of the Plan in respect of hedgerow protection are adequate and that no new policies are required.</p> <p>With regard to the mapping query it is advised that this issue should be submitted to the Council through it's customer care system.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
<p>SD-C195-154 Tallaght Community Council</p>	<p>Request NEW SLO</p> <p>"To reinstate the views onto Mount Pelier from Old Bawn, through sensitive crowing and pruning of the self-seeded, unmanaged poplar trees now removing this view from all park users and local residents."</p>	<p><b>CE Response:</b></p> <p>Submission is requesting the insertion of a new SLO under <b>Policy NCBH8 Dodder Valley Park</b></p> <p>This is operational matter for the Public Realm department of the Council and is outside the remit of the County Development Plan.</p> <p><b>CE Recommendation:</b></p>

		No change to Draft Plan.
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Natural Heritage-Geological Sites		
Submission No.	Submission Summary	CE response and recommendation:
<a href="#">SD-C195-54 Transport Infrastructure Ireland</a>	The submission notes inclusion of Geological Sites in table 3.4 but would welcome the consideration that Lucan cutting Lucan and Pettycanon, Esker South Roadside are omitted as public access to those sites provide safety issues along national road network and potential future roadworks.	<p><b>CE Response:</b></p> <p>Listing a geological site in the CDP does not infer that public access is possible or is facilitated to these sites. Most are on private property or along busy public roadways. The roadway sites are only visually accessible as vehicles drive by. Nationally, major roadway construction (e.g. M8) has revealed many interesting geological features which add to the awareness of our geological heritage.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
<a href="#">SD-C195-35 Department of Communications, Climate Action and Environment</a>	<p>Submission commends the Draft Plan in the area of Geoheritage, including the detailed description and listing of the 10 County Geological Sites (CGSs), in Table 5.4: 'Geological Heritage Sites in South Dublin County', in Section 5.4.4 'Geology', of the SEA Report, while also commending the inclusion of specific Policy NCB12 and NCB12 Objective 1, for geoheritage in South Dublin County in Chapter 3, Section 3.3.7 'Geology' of the draft CDP.</p> <p>The submission goes on to states that the Geological Heritage Programme views the Local Authority as critical partners in protecting, through the planning system, those</p>	<p><b>CE Response:</b></p> <p>The Council acknowledges the comments of the Department on the approach taken in relation to geological sites and welcomes confirmation that this approach is appropriate.</p> <p>The comments of the Department in relation to the potential conflicts between protecting geological vs ecological assets on a site are acknowledged. It is recommended that the NCBH12 Objective 1 be amended to reflect the Department's suggestion for early consultation.</p> <p><b>CE Recommendation:</b></p>

	<p>CGS which fall within their county limits. The submission goes on to state that CGS have been adopted in the National Heritage Plan and will form a major strand of geological nature conservation to complement the various ecological and cultural conservation measures.</p> <p>It is noted however, that management issues for the majority of geological heritage sites may differ from ecological sites, and in some cases development may facilitate enhanced geological understanding of a site by exposing more rock sections-for example, in a quarry extension. Consultation at the earliest stages can identify any issues relevant to an individual site or proposed development.</p>	<p>Amend wording of objective <i>NCBH12 Objective 1:</i></p> <p>from</p> <p><i>'To protect identified County Geological Sites from inappropriate development, and to promote the importance and potential of such sites through the County's Heritage Plan.'</i></p> <p>To the following wording</p> <p><i>'To protect identified County Geological Sites from inappropriate development, <b>avoiding potential conflicts with other ecological and cultural assets by engaging in consultation</b>, and to promote the importance and potential of such sites through the County's Heritage Plan'.</i></p>
<p>SD-C195-35 Department of Communications, Climate Action and Environment</p>	<p>Submission does note the inclusion of Monastery Road Quarry, Monastery Road, Clondalkin, which was included without Geological Survey Irelands CE Recommendation:, as it is not considered a 'best example' until a further review of the County Geological Sites takes place on a national basis in the longterm.</p>	<p><b>CE Response:</b></p> <p>Comment in relation to Monastery Road inclusion is noted. The Draft Plan does note that the inclusion was not recommended by the Department. The County Development Plan is a reserved function of the members of the Council. The inclusion of this item was made by them with the knowledge that it was not recommended by the Department. This issue may be reviewed as part of a further review of the county geological sites on a national basis.</p> <p><b>CE Recommendation:</b></p> <p>No Change to Draft Plan.</p>

**Natural Heritage-Pollinators and Parks**



Submission No.	Submission Summary	CE response and recommendation:
<p>SD-C195-19 Knocklyon Network</p>	<p>Submission calls for more enhancement of our natural green areas as the use of parks, pleasant walks, our Mountains and forests have been most important for our physical and mental health, particularly with Covid.</p> <p>Submission proposes that the Council work with Coillte Nature to make the forests and mountains in our County more accessible for walking, including by increasing parking for cars and bicycles.</p>	<p><b>CE Response:</b></p> <p>Chapter 9 of the Draft Plan includes a number of objectives EDE 19, 20,21 to promote tourism and leisure activities. The Draft Plan also includes relevant sustainable movement objectives. It is not considered necessary to add further objectives.</p> <p>The County Development Plan includes a range of objectives relating to access to the Dublin Mountains. The following are noted.</p> <p><b>Policy EDE19 Tourism Infrastructure</b></p> <p>Support the development of a sustainable tourism industry that recognises their creational and tourism potential of the County, building on the actions in the south Dublin County Tourism Strategy, 2015 or any superseding strategy.</p> <p>EDE19 Objective 3 provides support for the Dublin Mountains Visitor Centre at The Hell Fire Club.</p> <p><b>EDE19 Objective 3</b></p> <p>‘To support the development of the Dublin Mountains Visitor Centre at Hell Fire and Massy’s Wood in accordance with permission granted by An Bord Pleanála in June 2020 or any amending permissions.’</p> <p><b>Policy EDE20 Greenways, Trails and Loops</b></p> <p>Support and facilitate the development of an integrated network of Greenways (combined off road cycle and walking routes) and Trails (walking routes) along suitable corridors, with local connections to villages and attractions and to take account of the environmental sensitivities along these corridors.</p>

		<p><b>Policy EDE21 Tourism and Leisure Activities</b></p> <p>Support and facilitate the development of leisure activities in the County.</p> <p>It is further noted that all planning applications will be assessed on their merits taking all the provisions of the County Development Plan into account.</p> <p>Policies EDE23 and 24 address Public Rights of Way and Permissive Access Routes</p> <p><b>ED24 Objective 2:</b></p> <p>‘To promote and facilitate the continued development of the Dublin Mountains Way and the Wicklow Way in association with the Dublin Mountains Partnership, particularly Permissive Access Routes that provide access to regional and local networks of walking, running, hiking and mountain bike trails and other recreational facilities provided that such routes/trails and their use does not significantly impact on environmentally sensitive sites.’</p> <p>The Council will liaise with Coillte as appropriate. However, there are a number of objectives in the Plan to enhance accessibility across the County and through the GI network.</p> <p><b>CE Recommendation:</b></p> <p>No Change to Draft Plan.</p>
<p>SD-C195-164 Denise Delappe</p>	<p>A submission congratulates the Council on how beautiful the newly planted wildflower beds in Dodder Valley Park and to ensure that the adjoining grass areas that run adjacent to the flowers beds and the houses at the park perimeter are mowed.</p>	<p><b>CE Response:</b></p> <p>Comments on works carried out in the Dodder Park are noted and appreciated. However, individual projects in relation to treatment of public areas are operational matters for Public Realm Department of the Council and are outside the remit of the County Development Plan</p> <p><b>CE Recommendation:</b></p>

	The submission further calls for the grass strip on the bank at the entrance into Aylesbury Estate to be excluded from wilding.	No change to Draft Plan.
SD-C195-154 Tallaght Community Council	Add SLO To sensitively remove the undergrowth and scrub currently covering the ruinous cottages behind the Carmelite convent and below Kilsaran Cement, and the farm pillars / gateways on Timmons Lane, all on public owned parklands. These items are important pieces of built heritage which tell the story of Tallaght from the 19th century.”	<p><b>CE Response:</b></p> <p>The maintenance of features within the Councils parks are operational matters for the Public Realm Department of the Council and are outside the remit of the County Development Plan which is a policy document.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
SD-C195-279 Ballyboden Tidy Towns Group	The submission highlights the loss of street trees from grass verges and that the rate of replantation has not kept up with the rate of tree removal which needs to be addressed as a priority.	<p><b>CE Response:</b></p> <p>The Council Tree Management Strategy supports the retention of existing trees and replacement with new species where retention is not possible. While the Draft Plan supports tree planting and retention this is an operational matter for the relevant department of the Council.</p> <p><b>CE Recommendation:</b></p> <p>No Change to Draft Plan.</p>
SD-C195-279 Ballyboden Tidy Towns Group	Dumps and quarries represent rewilding opportunities and should not be left out of the Biodiversity Plan.	<p><b>CE Response:</b></p> <p>SDCC delivers re-wilding projects on an ongoing basis through County Pollinator and Biodiversity Action Plan and will continue to do so. Policy in the Draft County Development Plan in relation to pollinators supports this as set out below.</p> <p><b>GI2 Objective 6:</b></p> <p>To continue to support and expand the County Pollinator Plan through the management and monitoring of the County’s pollinator</p>

		<p>protection sites as part of the Council's commitment to the provisions of the National Pollinator Plan 2021-2025.</p> <p><b>GI2 Objective 9:</b></p> <p>'To exploit the full potential of existing underutilised perimeter and border park spaces through the augmentation of wild grasses and other naturally occurring vegetation that enhance local area biodiversity and habitats in support of the National Pollinator Plan and to consider wildflower meadows where beneficial to biodiversity.'</p> <p>However, the detail of particular re-wilding and other pollinator projects are operational matters.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
SD-C195-279 Ballyboden Tidy Towns Group	<p>Calls for the adoption of parklets as a tool for biodiversity and sets out a number of key actions in this regard including using parklets for SDCC Public Consultation booths and displays or outdoor exhibition spaces.</p>	<p><b>CE Response:</b></p> <p>The parklets referred to in the submission have been utilised during Covid to increase public use of streets and to facilitate local business in meeting covid restrictions. Potential further uses can be kept under review. However, this is a detailed matter outside the remit of the County Development Plan.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
SD-C195-279 Ballyboden Tidy Towns Group	<p>Raises concerns in relation to the lack of imagination, design and biodiversity incorporated in respect of roundabouts in SDCC seeks a review of the landscaping of roundabouts and application of the All Ireland Pollinator Plan with the objective to use roundabouts to be a showcase for SDCC, its staff and a tool for placemaking together with other proposed actions.</p>	<p><b>CE Response:</b></p> <p>The Draft Plan is based around policy and objectives which support protection of and investment in biodiversity, nature based solutions and green infrastructure recognizing the role they play in addressing climate change issues. See Policy <b>GI2 Biodiversity</b> and related objectives.</p>

		<p>'Strengthen the existing GI network and ensure all new developments contribute towards GI, in order to protect and enhance biodiversity across the County as part of South Dublin County Council's commitment to the National Biodiversity Action Plan 2021- 2025 and the South Dublin County Council Biodiversity Action Plan, 2020-2026, the National Planning Framework (NPF) and the East Regional Spatial and Economic Strategy (RSES).'</p> <p>The Council approach to planting on roundabouts is an operational matter for the Public Realm and Transport Department of the Council.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
SD-C195-279 Ballyboden Tidy Towns Group	Highlights the importance of road verges in terms of biodiversity in small patches throughout the county and encourages the establishment of targets and measurement indicators for each electoral area as well as other related.	<p><b>CE Response:</b></p> <p>The Draft Plan contains objectives to support biodiversity along road verges and other areas within Chapter 4 Green Infrastructure.</p> <p>The Draft Plan contains a monitoring framework in chapter 13. This will be further developed in support of annual monitoring proposed in the Draft Development Plan Guidelines issued by the Department of Housing, Local Government and Heritage, and the statutory 2 year review of the plan.</p> <p><b>CE Recommendation:</b></p> <p>No Change to Draft Plan.</p>
SD-C195-279 Ballyboden Tidy Towns Group	<p>Commends the skills and professional commitment of the SDCCs staff but considers that they are understaffed and under-resourced to deliver a Biodiversity Agenda to meet the challenge that South Dublin County Council is facing.</p> <p>Refers to the 'London Green Spaces Report' and some of the financial and ecological returns from investing in</p>	<p><b>CE Response:</b></p> <p>Comments in relation to the commitment and skills of Council staff are acknowledged and welcomed. The various benefits from investing in biodiversity/parks and open spaces are acknowledged through the overall approach of the County Development Plan 2022-2028 and the provisions therein.</p>

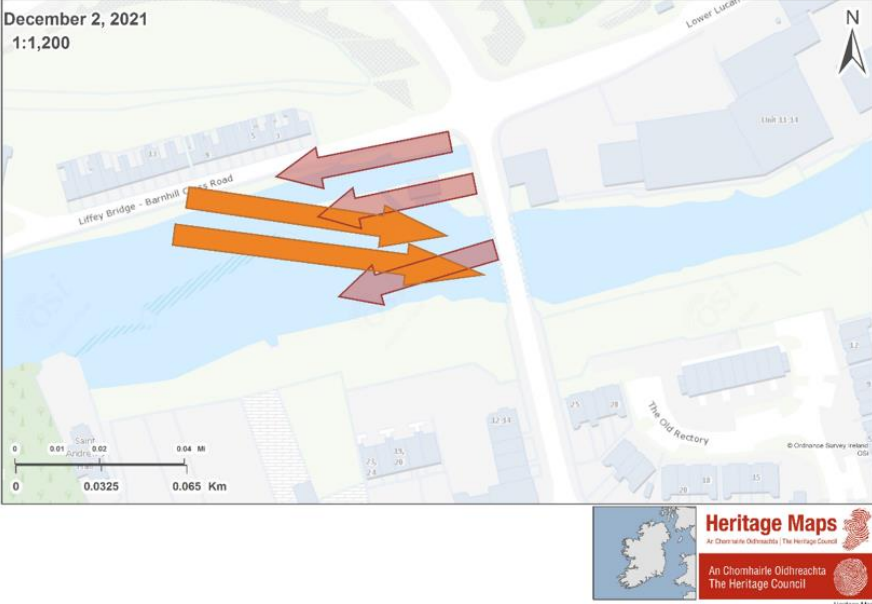
	<p>biodiversity and parks and open spaces. Refers to successes in biodiversity and amenity in Glandohr Park and to walking paths developed in Whitechurch Park and Dolly's Field in Moyville Estate and highlights the need for a Green Space Programme for Existing Estates just like the Natural Playspace Programme whereby in suitable locations a circular path (measured in Kilometres) can be installed on a green space, followed by tree and hedgerow planting followed by benches etc – in stages not overnight - in partnership with the local Parks Dept but in guardianship with local residents, developed in accordance with a Biodiversity &amp; Amenity Plan.</p>	<p>The Draft Plan is based around policy and objectives which support protection of and investment in biodiversity, nature based solutions and green infrastructure recognizing the role they play in addressing climate change issues. Policy <b>GI2 Biodiversity</b> and related objectives are relevant: .</p> <p><i>‘Strengthen the existing GI network and ensure all new developments contribute towards GI, in order to protect and enhance biodiversity across the County as part of South Dublin County Council’s commitment to the National Biodiversity Action Plan 2021- 2025 and the South Dublin County Council Biodiversity Action Plan, 2020-2026, the National Planning Framework (NPF)and the East Regional Spatial and Economic Strategy (RSES).</i></p> <p><i>See also Policy GI3 Sustainable Water Management, GI4 Sustainable Urban Drainage Systems and GI5 Climate Resilience and accompanying objectives.</i></p> <p><b>Policy GI3 Sustainable Water Management</b>  <i>Protect and enhance the natural, historical, amenity and biodiversity value of the County’s watercourses. Require the long-term management and protection of these watercourses as significant elements of the County’s and Region’s Green Infrastructure Network and liaise with relevant Prescribed Bodies where appropriate. Accommodate flood waters as far as possible during extreme flooding events and enhance biodiversity and amenity through the designation of riparian corridors and the application of appropriate restrictions to development within these corridors.</i></p> <p><b>Policy GI4 Sustainable Urban Drainage Systems</b>  <i>Require the provision of Sustainable Urban Drainage Systems (SUDS) in theCounty and maximise the amenity and biodiversity value of these systems.</i></p> <p><b>Policy GI5 Climate Resilience and accompanying objectives.</b></p>
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		<p><i>Strengthen the County's GI in both urban and rural areas to improve resilience against future shocks and disruptions arising from a changing climate.</i></p> <p>The detail of how these policy and objectives are addressed by the Council through the plan and programmes of each department (which determine which projects are advanced) is not a matter for the County Development Plan. There are budgetary matters which determine the extent to which individual projects or schemes can be delivered. However, the County Development Plan has delivered a strong policy framework for the advancement of appropriate projects across the local authority. Many of these overlap with the policy and objectives of the South Dublin Climate Change Action Plan 2019 on foot of which many biodiversity and open space projects have advanced and are yielding significant results. Small scale improvements are matters for the relevant operational sections of the Council.</p> <p><b>CE Recommendation:</b> No change to Draft Plan</p>
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<b>Natural Heritage-Views and Prospects</b>		
<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation:</b>
<p><a href="#">SD-C195-157 Cape Wrath Hotel Unlimited Company</a></p> <p><a href="#">SD-C195-168 Cape Wrath Hotel Unlimited</a></p>	<p>The submission highlights that Map 8 of the Draft Development Plan shows two sections of views which the Plan seeks to protect and preserve along the northern boundary of the subject lands at Fortunestown and Citywest and Naas Road.</p> <p>It is considered that these views appear to be a legacy from previous Development Plans. The submission indicates that this section of the Naas Road does not have any views or prospect of same. In this regard, it is</p>	<p><b>CE Response:</b></p> <p>The Draft Plan has mapped protected views across the County. Should planning applications which might potentially impact on existing views be lodged, they will be considered on their merits. Should the applicant be able to prove that the development does not impact on protected view the applicant should be in a position to easily establish same.</p> <p><b>CE Recommendation:</b></p>

	requested that the Draft Development Plan should also be amended to delete these non-existent protected views.	No change to Draft Plan.
SD-C195-225 An Cláomh Glas	The submission strongly objects to the inclusion of a new view and/or prospect of the River Liffey and Liffey Bridge in Lucan Village and indicates that the integrity of the Liffey Valley must be protected and the inclusion of new roads or access to the Valley must be resisted	<p><b>CE Response:</b></p> <p>NCBH15 SLO 3 states</p> <p><i>To consider the inclusion of a new view and/or prospect of the River Liffey and Liffey bridge in Lucan Village from adjoining roads through an assessment carried out by an independent professional.</i></p> <p>This SLO does not impact on the integrity of the Liffey Valley or new roads. The SLO refers to a view or prospect which would be identified on the development plan maps and for which associated policy applies to protect the view. The impact of development on protected Views and Prospects is considered in the assessment of planning applications. On foot of this SLO, the Council commissioned an independent consultant to assess the merit of including an objective on the development plan maps to protect views from Lucan Bridge and to the Bridge from the Barnhill Cross road. This assessment indicated that there was merit in protecting these views and Appendix X sets out the assessment. It is considered that a new objective should be inserted on the Development Plan maps to reflect the consultant's CE Recommendation:</p> <p><b>CE Recommendation:</b></p> <p>Insert new map based objectives on the Development Plan maps to protect views from Lucan Bridge looking west and from Barnhill Cross looking eastwards towards Lucan Bridge.</p>



		<p style="text-align: center;">Lucan Bridge</p> <p>December 2, 2021 1:1,200</p>  <p style="font-size: small;">© Ordnance Survey Ireland / OS</p> <p style="font-size: small;">Heritage Maps An Chomhairle Oidhreachta The Heritage Council</p> <p style="font-size: x-small;">This map is a user-generated static output from HeritageMaps.ie and is for general reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. Visit HeritageMaps.ie for our full Data Use Agreement.</p>
<p>SD-C195-31 William Lavelle</p> <p>SD-C195-225 An Claíomh Glas</p>	<p>The Development Plan should seek to protect and enhance the Lucan Weir/Bridge areas with a view to it being a marquee public space in the county and sets out specific objectives for inclusion in this regard.</p>	<p><b>CE Response:</b></p> <p>Lucan Weir and Bridge are already Protected Structures and therefore no further objectives are required in this regard. The proposed upgrades are noted, including the paving of the promenade and the re-routing of the Canal Loop Greenway. This area is being enhanced as part of the Lucan Village Design Project. The Canal Loop will be subject to a separate Part 8 public consultation process.</p> <p><b>CE Recommendation:</b></p>

		No Change to Draft Plan.
SD-C195-154 Tallaght Community Council	<p>Add Protected Views</p> <p>The Pigeon House chimneys – visible from Aylesbury park, Marlfield and Dodder Valley Old Bawn and Tymon South.</p> <p>- Waterway structures, Balrothery Weir and Old Bawn Waterfall.</p> <p>St Maelruains Tower, Tallaght village, National Basketball Arena (unique roof feature), Tymon. VIEWS</p> <p>In addition, the submission requests for the following SLOs to be included:</p> <p>To seek to develop the area around Tymon Esker / Balrothery Cross as a viewing location for views onto the full Dublin Mountain range – 2 rock to Tallaght hill.</p> <p>To see to develop an area in the TTC area as a viewing location onto the full Dublin Mountain range, to create a tourist amenity and value in the town centre area of the County Town.</p>	<p><b>CE Response:</b></p> <p>Pigeon House Chimneys: These structure are located at a significant distance from the areas from which views are suggested therefore identification of robust, reasonable and implementable protected views of these structures is not considered viable.</p> <p>Waterway Structures: Areas from which structures are to be viewed are not defined. However, views from any distance is limited as they are low lying areas with significant landscaping in proximity. It is not proposed to add protected views in relation to these structures at this time.</p> <p>Locations from which St Maelruan’s Tower, Tower, Basketball Arena, Tallaght Village have not been specified in the submission and are very general</p> <p>There are a multitude of areas across the County from which there are excellent views of the Dublin/ Wicklow Mountains. Given the number of potential views it is not considered necessary to provide for specific viewing locations.</p> <p>As part of the County Development Plan review, an update to the Landscape Character Assessment of South Dublin County (2015) was undertaken. This involved both additional fieldwork in addition to a review of existing views and prospects focused on the Dublin/Wicklow mountains and River Liffey in particular.</p> <p>Fieldwork was undertaken over three days in September/October 2020 and a criteria based assessment was undertaken on the existing scenic routes and prospects in addition to a number of views identified for consideration in the 2015 Baseline Report.</p>

		<p>Following this review it is considered that the Draft Plan has taken a considered approach to views and prospects and no further views are required at this time.</p> <p><b>CE Recommendation:</b></p> <p>No Change to Draft Plan.</p>
SD-C195-109 South Dublin Conservation Society	Asks if NCBH15 SLO 1, 2, 3, and 4, are these additional viewing structure really necessary as they might become a blot on the landscape.	<p><b>CE Response:</b></p> <p>NCBH15 SLO 1, 2, 3, and 4 refers to the provision of viewing areas at a number of location in the County. These provisions do not necessarily require the construction of a viewing structure. Where this is the case they will be required to be sensitively designed in accordance with the provisions of the Draft Plan.</p> <p><b>CE Recommendation:</b></p> <p>No Change to Draft Plan.</p>

Cultural Heritage		
Submission No.	Submission Summary	CE response and recommendation:
SD-C195-137 Declan Hanley	The submission wishes to see more signage in the Irish language as well as the inclusion of a Gaelic quarter and Irish street names.	<p><b>CE Response:</b></p> <p>Section 3.4.1 of the Draft Plan notes that the National Planning Framework (NPF) recognises ‘Enhanced Amenities and Heritage’ as a National Strategic Outcome and sees our natural, cultural and built heritage as a having a fundamental value that adds to the identity and sense of place of urban and rural areas. Promotion and safeguarding of the Irish language and culture is also one of the NPF objectives.</p> <p>The provisions of policy <b>NCBH 17</b> ‘ Promote, support and preserve the Irish Language in the County’ and objectives 1- 7 are also noted</p>

		<p><b>NCBH 17 Objective 1</b></p> <p>'To promote the use and visibility of the Irish Language'.</p> <p><b>NCBH17 Objective 2:</b></p> <p>To support the preparation and implementation of an Irish Language Plan for Líonra Gaeilge Chluain Dólcáin / Clondalkin Irish Language Network Area, consistent with RPO 9.28 of the RSES.</p> <p><b>NCBH17 Objective 4:</b></p> <p>To promote local heritage by supporting names for new residential developments that reflect the local and historical context of their siting and include the Irish Language.</p> <p><b>NCBH17 Objective 6:</b></p> <p>To promote the use of the Irish language in signage within the County.</p> <p>The use of the Irish language in Clondalkin has been increasing in recent years and the area has received national recognition through designation as an Irish Language Network Area, due to the achievement of a critical mass of community and State support for use of Irish. On foot of this designation Clondalkin is required to prepare an Irish Language Plan. See section 3.4.6 of Draft Plan.</p> <p>The designation of Líonra Gaelige status falls under the remit of the Department of Tourism, Culture, Arts, Gaeltacht, Sport &amp; Media and as such the proposed objective is not something which is a matter for the County Development Plan.</p> <p>It is considered that the provisions of the Draft Plan address the issues raised in this submission.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
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<p>SD-C195-109 South Dublin Conservation Society</p>	<p>The prospect of Montpelier Hill has been destroyed by high rise apartments on Hunter's Road, taller building should not be allowed on higher ground.</p>	<p><b>CE Response:</b></p> <p>This concerns noted in the submission are noted.</p> <p>The Draft Plan contains specific provisions in Chapter 6 Housing in relation to development on 'Steep or Varying Topography Sites' as follows:</p> <p><b>6.7.6 Steep or Varying Topography Sites</b></p> <p><i>The design and siting of new residential development should respond appropriately to the natural topography of its site and improve upon and enhance natural characteristics. This should be based on a thorough site analysis and context review. To minimise ecological and visual impacts, residential development on sites with a steep or varying topography should utilise the natural slope of the landscape and avoid intrusive engineering features.</i></p> <p><b>Policy H12: Steep or Varying Topography Sites</b></p> <p><i>Ensure that development on lands with a steep and/or varying topography is designed and sited to minimise impacts on the natural slope of the site.</i></p> <p><b>H12 Objective 1:</b></p> <p><i>To ensure that all developments including buildings, streets and spaces are designed and arranged to respond to and complement the site's natural contours and natural drainage features in accordance with the CE Recommendation:s of the Urban Design Manual – A Best Practice Guide (2009).</i></p> <p><b>H12 Objective 2:</b></p> <p><i>To avoid the use of intrusive engineered solutions, such as cut and filled platforms, embankments or retaining walls on sites with steep or varying topography.</i></p> <p>The Draft Plan also contains the new South Dublin County Building Height and Density Guide (Appendix 10), and accompanying</p>
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		<p>policies and provisions under Chapter 5 Quality Design and Healthy Placemaking, which sets out the key considerations in relevant varying site contexts across the County together with performance-based assessment criteria which will enable proper consideration of development proposals for increased building height linked to the achievement of a greater density of development. All medium to large scale and complex planning applications (30 + residential units, commercial development over 1,000 sq.m. or as otherwise required by the Planning Authority) are required to be accompanied by a 'Design Statement' that include, inter alia, a detailed analysis of the proposal and statement based on the guidance, principles and performance-based design criteria set out in the South Dublin County's Height and Density Guide.</p> <p>In addition, under 'The Plan Approach' Compliance Report and Design Statement requirements, as set out under Section 13 4.2 of the Draft Plan, all planning applications for development must also demonstrate how the proposal constitutes a positive urban design CE Response: to the local context and how it contributes to placemaking and the identity of an area.</p> <p>It should be noted that the Draft Plan and accompanying BHDG are aligned with Section 28 Ministerial Guidelines and Specific Planning Policy Requirements which prohibit blanket numerical limitations on building height.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Plan.</p>
SD-C195-39 Fíonán Ó Cuireáin	<p>Measaim gur bhfuil cur chun cinn na Gaeilge a chuir ar an mheár fhada muna ndéantar níos mó béim ar athbheochán na teangan ar fud na condae.</p> <p>Ba chóir níos mó ranganna agus ciorcail comhrá a fhorbairt sna bailte sa chondae faoi threoir oifigeach Gaeilge sa Chomhairle Chondae. Tá na mílte daoine</p>	<p><b>Freagra</b></p> <p>Tugann Rannóg 3.4.1 den Dréachtphlean a haghaidh ar chur chun cinn na Gaeilge sa Chontae. Luaitear na soláthairtí seo a leanas.</p> <p><b>Oidhreacht Nádúrtha, Chultúrtha agus Thógtha (ONCT) 17 An Ghaeilge agus an Oidhreacht Áitiuil</b> 'An Ghaeilge agus cuspóirí ábhartha a chur chun cinn, tacaíocht a thabhairt di agus í a</p>

	<p>sa chondae atá líofa le Gaeilge ach níl an deis acu an teanga dhúchais a labhairt ó lá go lá.</p> <p>Caithfidh infhéistíocht fiúntach a chuir isteach i bhforbairt na Gaeilge don todhcaí mar cosúil leis an comhshaol ní bheidh Gaeilge beo ag na glúnta ata le teacht.</p> <p>Seo seans nár chóir do Comhairle Condae Bhaile Átha Cliath a chailleadh!</p>	<p>chaomhnú'. Luaitear na cuspóirí ábhartha thíos.</p> <p><b>ONCT 17 Cuspóir 1</b></p> <p>'Úsáid agus feiceálacht na Gaeilge a chur chun cinn'</p> <p><b>ONCT 17 Cuspóir 2:</b></p> <p>Tacaíocht a thabhairt d'ullmhú agus do chur i bhfeidhm Plean Teanga do Líonra Gaeilge Chluain Dolcáin, faoi réir Chuspóir Pleanála Réigiúnaí 9.28 na Straitéise Spáis agus Eacnamaíochta Réigiúnaí. <b>ONCT 17 Cuspóir 3:</b></p> <p>'Leanúint le húsáid na Gaeilge in ainmniú forbraíocht chónaithe nua a chur chun cinn.'</p> <p><b>ONCT17 Cuspóir 4:</b></p> <p>'An oidhreacht áitiúil a chur chun cinn trí thacaíocht a thabhairt d'ainmneacha forbraíochtaí cónaithe nua a léiríonn comhthéacs áitiúil agus stairiúil a lonnaíochta agus an Ghaeilge a chur san áireamh.'</p> <p>Tá mionsonraí na dtionscadal agus na ngníomhaíochtaí a mbaineann an Chomhairle leas astu chun an Ghaeilge a chaomhnú sa Chontae taobh amuigh de shainchúram Phlean Forbartha an Chontae. Is ceist don Phríomhfheidhmeannach an soláthar foirne.</p> <p><b>Moladh</b></p> <p>Ná hathraítear an Dréachtphlean</p> <p><b>CE Response:</b></p> <p>Section 3.4.1 of the Draft Plan addresses the promotion of the Irish language in the County. The following provisions are noted.</p>
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	<p>Submission considers that the promotion of the Irish language has been put on the long finger and more emphasis on its revival is required such as the development of classes and conversation circles across the County under the direction of an Irish Language Officer in the Council. Investment in the development of Irish language for the future is required so it will live for generations to come.</p>	<p><b>NCBH 17 Irish Language and Local Heritage</b> 'Promote, support and preserve the Irish Language in the County' and relevant objectives. Relevant objectives are noted below.</p> <p><b>NCBH 17 Objective 1</b>          'To promote the use and visibility of the Irish Language'.</p> <p><b>NCBH17 Objective 2:</b>          To support the preparation and implementation of an Irish Language Plan for Lónra Gaeilge Chluain Dólcáin / Clondalkin Irish Language Network Area, consistent with RPO 9.28 of the RSES.</p> <p><b>NCBH17 Objective 3:</b>          'To continue to promote use of the Irish language in the naming of new residential developments.'</p> <p><b>NCBH17 Objective 4:</b>          'To promote local heritage by supporting names for new residential developments that reflect the local and historical context of their siting and include the Irish Language.'</p> <p>The detail of projects and activities which the Council utilises to promote and preserve the Irish language in the County is an operational matter subject to budgetary constraints for the relevant Department of the Council. Staffing issues are a matter for the Chief Executive.</p> <p><b>CE Recommendation:</b>          No change to Draft Plan.</p>
<p>SD-C195-222 Tallaght Community Council</p>	<p>New SLO stating, 'reach out to the heritage council and scope a historic Townsland recording, awareness and naming projects - funded, supported and delivered during next CDP'.</p>	<p><b>CE Response:</b>          The submission indicates that the new SLO is to be inserted under the heading 'Heritage'. It is not specified but is relevant to Policy <b>NCBH17 Irish Language and Local Heritage</b>.</p>



		<p>NCBH17 Objective 4 states:</p> <p>To promote local heritage by supporting names for new residential developments that reflect the local and historical context of their siting and include the Irish Language</p> <p>While such a project as suggested is supported and would inform naming under NCBH17 Objective 4, the matter of townland mapping is one for the County Heritage Plan.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
<a href="#">SD-C195-222 Tallaght Community Council</a>	<p>New SLO asking SDCC and government bodies about conserving place names impacted by newer roadways such as Goose Park, Old Bawn Cross, Balrothery Cross, Tallaght Road – can they be preserved, reinstated and signposted.</p>	<p><b>CE Response:</b></p> <p>The submission indicates that a new SLO is to be inserted under the heading 'Heritage'.</p> <p>Placenames for roads and other infrastructure are not a matter for the County Development Plan. The Council has an Infrastructure Naming committee which looks after such matters.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
<a href="#">SD-C195-154 Tallaght Community Council</a>	<p>Add SLO: To support the protection and signposting of the underground watercourse stone arch on the Old Blessington Rd, accessible from the public pathway, to elevate it as a heritage feature and to secure its heritage value in the village ACA.</p>	<p><b>CE Response:</b></p> <p>The proposed SLO is proposed under NCBH19: Protected Structures but is more relevant to Cultural Heritage.</p> <p>The protection of items of local heritage value is provided for by the inclusion of a number of objectives in the Draft Plan. See NCBH1 Objective 2, NCBH16 Objective 4 and Policy GI7 are noted as is EDE20 Objective 2. The detail of signate location is an operational</p>

		<p>matter for the relevant Department of the Council taking cognizance the requirements of the County Signage Strategy. See SM2 Objective 12 below.</p> <p><b>NCBH1 Objective 1:</b></p> <p>To protect, conserve and enhance natural, cultural and built heritage features, seeking opportunities to identify, retain, protect, and incorporate heritage assets into plans and development.</p> <p><b>NCBH1 Objective 2:</b></p> <p>To support the objectives and actions of the County Heritage Plan and the County Biodiversity Action Plan in the promotion and protection of natural, built and cultural heritage, and to take full cognizance of the County's Landscape Character Assessment and the County Geological Audit in the sustainable management of development.</p> <p><b>NCBH16 Objective 4:</b></p> <p>To support the preparation and implementation of any updated County Heritage Plan incorporating the promotion and protection of the County's Cultural Heritage.</p> <p><b>EDE20 Objective 2:</b></p> <p>To support the development of local tourist and heritage trails at suitable locations including across the Dublin Mountains, and between and within Brittas-Saggart-Rathcoole; Clondalkin; Lucan; Newcastle-Lyons; Rathfarnham; and Tallaght and seek to make such trails interactive through the use of sensitive signage and the further development of mobile application software ensuring in HA DM that all such trails are sensitively landscaped and designed to ensure positive impact on biodiversity and visual amenity.</p> <p><b>SM2 Objective 12:</b></p>
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		<p>To support the implementation of the Council's adopted County-wide signage strategy (2020) that accords with the National Traffic Signs Manual and the Failte Ireland 'Dublin Visitor Orientation Strategy' (2020) and takes into account the local heritage and history of an area, particularly in a village.</p> <p>It is considered that the Draft Plan contains sufficient policy to provide for the intent of the submission.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
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<b>Built Heritage</b>		
<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation:</b>
<a href="#">SD-C195-213 An Taisce</a>	<p>Considers that the CDP should ensure the effective promotion of the Architectural Heritage provisions of Planning and Development Act 2000 (as amended) and therefore the protection of South Dublin's built heritage, including Architectural Conservation Areas (ACAs) and Protected Structures.</p>	<p><b>CE Response:</b></p> <p>The Draft Plan contains multiple objectives supporting and protecting the architectural heritage of the County. In particular, NCBH 19 (Protected Structures), NCBH 20 (Architectural Conservation Areas) and NCBH 21( Vernacular/ Traditional and Older Buildings, Estates and Streetscapes). The Council is committed to compliance with the provisions of the Planning and Development Act 2000 (as amended) in respect of Architectural Heritage of the County.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<a href="#">SD-C195-154 Tallaght Community Council</a>	<p>NCBH19 Objective 4 - Queries what the impact will be of sites like The Priory going for sale.</p>	<p><b>CE Response:</b></p> <p>NCBH19 Objective 4 states:</p> <p>To support alternative uses for Protected Structures including former institutional sites in order to provide continued security of the</p>

		<p>heritage value of these buildings, attendant grounds and associated landscape features. To this end, the relaxation of site zoning restrictions may be considered in order to secure the preservation and conservation of the protected structure where the use proposed is compatible with the existing structure and where the proposed development is consistent with best practice conservation policies and the proper planning and sustainable development of the area.</p> <p>The intent of the objective is to secure the heritage value of buildings of historical interest and their attendant grounds. It allows for some flexibility around the use requirements set out in the relevant zoning matrix where the proposed use is compatible with existing uses on the site and where the development demonstrates best practice conservation policies and proper and sustainable development. The sale of individual private sites is not a matter for the County Development Plan and any planning application which may arise will be assessed on its merits and relevant policy.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<p>SD-C195-154 Tallaght Community Council</p>	<p>NCBH23 Objective 7 - add in "...utility boxes, parking meters and commercial finger signs."</p>	<p><b>CE Response:</b></p> <p>NCBH23 Objective 7 states as follows;</p> <p><i>To improve the streetscape of the historic villages with the removal of unnecessary poles on footpaths and overhead cables to emphasise the visual impact of shopfronts and building features.</i></p> <p>The works referred to in this objective to which additions are proposed are usually facilitated under the village enhancement/initiative programme. While there is no objection to the intent of the proposed amendment the reference to specific items may create issues where no alternative for the provision of these structures is possible, noting also that not all structures can be listed in an objective. Therefore, it is considered that an amended objective would be appropriate</p>

		<p><b>CE Recommendation:</b></p> <p>Amend NCBH23 Objective 7 to read as follows;</p> <p>'To improve the streetscape of the historic villages with the removal of unnecessary poles, <b>overhead cables and other structures on footpaths, where feasible</b> to emphasise the visual impact of shopfronts and building features.'</p>
SD-C195-154 Tallaght Community Council	NCBH24 Objective 3 - the submission queries how this objective can be proactive with regards to Ring fenced funds, national funding, etc.	<p><b>CE Response:</b></p> <p><b>NCBH24 Objective 3</b> states:  <i>To encourage and support the delivery of projects that repair and conserve historic structures in accordance with national grant schemes for architectural conservation.</i></p> <p>The Council can act in numerous ways to encourage and support the delivery of projects that repair and conserve historic structures. Where historic sites/buildings on the RPS are in private ownership the responsibility and duty of care remains with the owners/occupiers who can apply for funding under the National Architectural Conservation Grant schemes. The Council will provide advice and support where possible. Where structures are in the ownership of the Local Authority the Council, the Architectural Conservation Officer continues to advise and support by providing funding through Capital funds for Council owned protected structures where conservation and repair works have been identified, projects delivered by the Council Department with responsibility for the site in consultation with the Architectural Conservation Officer.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
SD-C195-154 Tallaght Community Council	NCBH25 Objective 6 - add in "... and private ownership."	<p><b>CE Response:</b></p> <p><b>NCBH25 Objective 6</b> states as follows</p>

		<p>'To consider the adoption of governance tools such as the Health Check Programme, Conservation Plans for special sites and the Living Town Initiatives in the promotion of heritage-led regeneration.</p> <p>The intent of the submission is not clear. No further action required.</p> <p><b>CE Recommendation:</b></p> <p>No change to draft Plan</p>
SD-C195-154 Tallaght Community Council	NCBH26 Objective 2 - add in "... and tributaries."	<p><b>CE Response:</b></p> <p><b>NCBH26 Objective 2:</b> states:</p> <p><i>'To protect, preserve and maintain industrial heritage features including weirs, millraces and mills along the River Dodder, River Camac and River Liffey.</i></p> <p>There is no objection to this addition.</p> <p><b>CE Recommendation:</b></p> <p>Amend NCBH 26 Objective 2 as follows</p> <p><b>NCBH26 Objective 2:</b></p> <p>To protect, preserve and maintain industrial heritage features including weirs, millraces and mills along the River Dodder, River Camac and River Liffey <b>and their tributaries.</b></p>
SD-C195-109 South Dublin Conservation Society	NCBH 19 Objective 8, add in "from where it leaves the Liffey at Fonthill..."	<p><b>CE Response:</b></p> <p>NCBH19 Objective 8 states;</p> <p><i>'To support the restoration of the Mill Race (RPS Ref. 007), recognising that it is in private ownership, from where it leaves the Liffey to where it enters the Mills area at Palmerstown having regard to the potential for biodiversity enhancements'</i></p>

		<p>The submission requests the word 'at Fonthill' to be added'</p> <p>There is no objection to this addition</p> <p><b>CE Recommendation:</b></p> <p>To support the restoration of the Mill Race (RPS Ref. 007), recognising that it is in private ownership, from where it leaves the Liffey <b>at Fonthill</b> to where it enters the Mills area at Palmerstown having regard to the potential for biodiversity enhancements'</p>
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**Built Heritage-Protected Structures-Structures of Special Interest**

<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation:</b>
<p><a href="#">SD-C195-279 Ballyboden Tidy Towns Group</a></p> <p><a href="#">SD-C195-145 Moyville residents Association</a></p>	<p>The submission requests that SDCC prepare a Long-Term Management Plan for Whitechurch Library - which is referred to as "Carnegie Library, Ballyboden" in the Council's Record of Protected Structures identified in the National Inventory of Architectural Heritage (N.I.A.H.) survey of the South Dublin County Area – to ensure it remains open for public use.</p> <p>A submission requests that the Draft Plan includes an objective to avoid adverse impact on the setting of the Whitechurch Library and that surrounding development respects the scale and character of the protected structure.</p>	<p><b>CE Response:</b></p> <p>Whitechurch Library is now under the auspice of the Community Department for use as a community facility. As such, a Management License has been entered into with the WEB Project for them to manage the facility and caretake the building. The Library houses the project's work with children, young people and adults with intellectual and physical disabilities, along with classes on Irish, Art, Social History, Yoga etc for members of the wider community. The building is also used by the South Dublin Mediation Bureau and Knocklyon Women's Group, and is open to other community groups to use if space is available.</p> <p>The WEB Project have recently secured planning permission for a Changing Place facility in the grounds of the building has been assessed from a conservation perspective. Changing Places are for use by people with physical disabilities and are open to the public in order to promote social inclusion within the community.</p> <p>All work has been carried out in consultation with the Council's Architectural Conservation Officer</p>

		<p>The plan for the building is to continue its usage as a community facility while being cognisant of the status as a protected structure. It is considered that the fact that the library is on the list of protected structures and development has resulted in development being carried out sensitively.</p> <p>Any proposed developments in the vicinity of the site must take into account its status as a protected structure. This is managed through the Development Management Process.</p> <p>The Draft Plan contains strong policy on Protected Structures and their conservation. Policy on design is set out in Chapter 5 where objectives are included to support sensitive design respectful of the surrounding character of the area. It is considered that the draft Plan provides for sufficient protections for the library and other protected structures.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<p><a href="#">SD-C195-19 Knocklyon Network</a></p>	<p>Welcome all efforts to maintain our Build Heritage. for areas like Carthy's Castle, Mount Venus Cemetery to receive attention.</p>	<p><b>CE Response:</b></p> <p>Carthy's Castle is a ruin and a protected structure which is located on private land therefore the duty of care lies with the owner of the structure. Mount Venus Cemetery is also a protected structure. Where structures are under the ownership of the Council their management is an operational matter outside the remit of the County Development Plan.</p> <p><b>CE Recommendation:.</b></p> <p>No change to Draft Plan</p>
<p><a href="#">SD-C195-61 Fonthill Residents Association</a></p>	<p>The submission requests that Protected Structure RPS Ref: 267 Rosebank, Ballyboden Rd, Rathfarnham is retained on the RPS in the new adopted Plan. If any request is sought to change this status, Fonthill Residents Association would like to be notified.</p>	<p><b>CE Response:</b></p> <p>The structure remains on the RPS in the Draft Plan</p> <p><b>CE Recommendation:</b></p>



		No change to Draft Plan
SD-C195-109 South Dublin Conservation Society	A submission has requested that the Council investigate the merit in acquiring the former gunpowder mill complex and associated buildings at Kilmatead/Corkagh to safeguard these building under public ownership.	<p><b>CE Response:</b></p> <p>The accompanying maps with the Draft Plan identifies the former gun-powder store as a protected structure RPS No. 205 (Appendix 3A). This gives the structure a high level of architectural protection by way of this designation. The site is located within Corkagh Park which is covered by a Masterplan. The masterplan acknowledges the heritage assets within the park and provides for long term projects within the heritage setting and spaces and contains aspirations for adaptation and reuse of old structures such as the Gun Powder Mills</p> <p>There is an existing policy and objective in the Draft Plan NCBH Policy 16 and NCBH 16 Objective 1 which seeks to promote and encourage sensitive and adaptive reuse of industrial heritage as follows:</p> <p>NCBH Policy 16 – “To promote the County’s Industrial Heritage”.</p> <p>NCBH 16 Objective 1 – “To promote and encourage the sensitive and adaptive reuse of industrial heritage structures where appropriate, ensuring that any change does not seriously impact on the intrinsic character of the structure and that all works are carried out in accordance with best practice conservation, consistent with RPO 9.27 of the RSES”.</p> <p>It is considered that the policy and objective outlined in the Draft Plan, and the fact that the Gun Powder Mills/store are already on the record of protected structures, alongside the masterplan for Corkagh Park, are sufficient to ensure its protection. The acquisition of land and/or property is outside the remit of the County Development Plan.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>

<p>SD-C195-154 Tallaght Community Council</p>	<p>Welcomes NCBH13 Objective 2 but wishes to see included “previously unknown historical sites”.</p>	<p><b>CE Response:</b></p> <p>The submission seeks to add the word historical to NCBH13 Objective 2:</p> <p><i>To ensure that development is designed to avoid impacting on archaeological heritage including previously unknown <b>historical</b> sites, features and objects’</i></p> <p>The objective relates to the archaeological heritage of the County under Policy NCBH16 Archaeological Heritage. It is considered that the word historical is not necessary in this context and may limit the scope of the objective as it relates to archaeology.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<p>SD-C195-109 South Dublin Conservation Society</p>	<p>Requests to know what is being done to safeguard heritage in Council ownership, are inspections and maintenance works carried out to keep buildings in good condition such as Friarstown House and Kilcarbery House, what evidence is available to the public on reports and inspections?</p> <p>Add New Objective to restore Friarstown House and bring it into public use.</p>	<p><b>CE Response:</b></p> <p>The query regarding the safeguarding of heritage in Council ownership is not a matter for the County Development Plan. Queries regarding maintenance work and inspections should be re-directed to the Architectural Conservation Section of the Council.</p> <p>Friarstown House is in the Council’s ownership and has been rented for a number of years. There are no plans at this time to bring it into public use.</p> <p><b>CE Recommendation:</b></p> <p>No Change to Draft Plan</p>
<p>SD-C195-208 Iarnród Éireann / Irish Rail SD-C195-109 South Dublin Conservation Society</p>	<p>The submission states that Iarnród Éireann have not received notice of any new structures to be added to the Register of Protected Structures and presume that there are no additions on railway property. Any proposals to add railway structures, including but not limited to bridges, to the</p>	<p><b>CE Response:</b></p> <p>Any additions or deletions to the RPS are required by legislation to be referred to relevant bodies including Iarnród Éireann if the</p>

	<p>Register of Protected Structures should be notified to the Senior Track and Structures Engineer, Iarnród Éireann, Pearse Station, Westland Row, Dublin 2 D02 RV00.</p> <p>In addition, the submission notes NCBH19 SLO 4: “To investigate the merit of including Callaghan’s Bridge in the Record of Protected Structures” and requests that SDCC ensure that the pursuance of the inclusion of Callaghan’s Bridge in the Record of Protected Structures does not hinder the implementation of the DART+ West Project, which the Council supports the delivery of under objectives SM1 Objective 3 and SM3 Objective 2.</p> <p>NCBH 19 SLO 4, add in “Callaghan’s Bridge (Fort Bridge), Ballinascorney Road, Bohernabreena....”.</p>	<p>changes impact on railway property. No new structures have been incorporated into the Draft Plan at this time.</p> <p>In relation to the addition of Callaghan’s Bridge to the RPS. This issue has been investigated and it is recommended that the structure be added to the RPS subject to statutory requirements being complied with.</p> <p>The process of recommending structures to be included in the new Development Plan will take place outside the Development Plan process and will be carried out in accordance with the procedures set out in legislation under section 55 of the Planning and Development Acts.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan</p>
<p>SD-C195-279 Ballyboden Tidy Towns Group</p>	<p>The property referred to as Palmyra on Whitechurch Road, within the attendant grounds of St Marys of the Blessed Virgin Abbey founded in 1139 requires protection due to its archaeological and historical significance, either through a listing or other protection method.</p>	<p><b>CE Response:</b></p> <p>The site of Palmyra House, Whitechurch is a separate site to that of the Whitechurch Church and Graveyard site which is adjacent. The existing house at Palmyra is being maintained and cared for by the private owners. In a recent planning application (SD21B/0372) for upgrades and a new extension to allow the property to be updated for modern living standards. The development was assessed as if the property were a protected structure with a conservation report and impact assessment being completed by a Conservation Architect as part of the proposed development. It is considered that the property is in no way under threat and therefore does not warrant inclusion or any other protection mechanisms.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>

<p>SD-C195-279 Ballyboden Tidy Towns Group</p>	<p>Requests an SLO for St Catherine's Gate, Taylors Lane to retain its public exhibition function and as a focal point for community &amp; heritage gatherings within Ballyboden Village.</p>	<p><b>CE Response:</b></p> <p>The Draft Plan includes an objective 'to prepare a new Local Area Plan for Ballyboden' QD 14 SLO 2 LAP.</p> <p>It is considered that this issue, as a matter of detail, would be more appropriately considered as part of the preparation of the Local Area Plan</p> <p><b>CE Recommendation:</b></p> <p>No Change to Draft Plan</p>
<p>SD-C195-279 Ballyboden Tidy Towns Group</p>	<p>The submission calls for Newbrook House and the accompanying Paper Mill buildings and millrace in situ to be secured for future public access as part of any development including coffee shop, community room/gallery and outdoor public realm, having regard to the ecological significance of the site and the potential community, biodiversity and amenity gain.</p>	<p><b>R CE Response:</b></p> <p>Newbrook House is subject to a planning application which provides for its own public consultation.</p> <p>Newbrook House is a protected structure. It is noted that there is currently a live planning application for a Nursing Home and independent living units which, if granted, would see the existing house being reused and being incorporated into the new proposed development under SD21A/0232. The proposal includes the millrace which is retained on site and incorporated as part of the green infrastructure and public realm/outdoor space for residents of the nursing home. The application also includes a hair salon, function suite and cinema which are proposed to be open to the public. The application is still under consideration. It is noted that the Ballyboden Tody Town Group have made a submission on the planning application.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<p>SD-C195-78 Recorder Residents Associarion</p>	<p>The following County Council Cottages Nos 168 – 186 Whitehall Road to added to the list of Protected Structures.</p>	<p><b>CE Response:</b></p> <p>It is considered that the County Council Cottages Nos 168 – 186 Whitehall Road be assessed to confirm if they meet the criteria for</p>

		<p>designation as an ACA as this is a more appropriate approach than individual designation of buildings.</p> <p><b>CE Recommendation:</b></p> <p>Insert a new objective as follows:</p> <p>To assess the County Council Cottages Nos 168 – 186 Whitehall Road with a view to protecting them through the mechanism of an Architectural Conservation Area.</p>
SD-C195-78 Recorder Residents Associarion	Submits that the Road Sign – Bothair An Racadair to be added to the pertinent record as it is the original road sign for Whitehall Road.	<p><b>CE Response:</b></p> <p>It is considered that the Road Sign – Bothair An Racadair be considered for addition to the RPS and that a new objective be added to Policy NCBH19</p> <p><b>CE Recommendation:</b></p> <p>To insert a new objective under Policy NCBH19 as follows:</p> <p>To investigate the merit of including on the Record of Protected Structures the road sign Bothair An Racadair, Whitehall Road.</p>
SD-C195-78 Recorder Residents Associarion	The interior of Kimmage Manor House and the lands surrounding it be included in the description of the Protected Structures listing.. Reference: Schedule 2. Protected Structures. - Listed Buildings: Map ref: 185 Dev. Plan 2016-2022. Holy Ghost Missionary College, Whitehall Road, Kimmage. Three Bay, Two Storey with Attic, Tudor Revival house.	<p><b>CE Response:</b></p> <p>The description of Kimmage Manor as set out in the RPS relates to the structures within the curtilage of the Holy Ghost and Kimmage Manor, no change to this description is recommended.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
SD-C195-78 Recorder Residents Associarion	Granite County Boundary Stone suggested to be added to listings of Boundary/Mile Stones. Located outside no 50 Whitehall Road. This marked the County Boundary up until the 1960's when the Boundary was moved to Kimmage Road West – Thus putting the whole of Whitehall Road into	<p><b>CE Response:</b></p> <p>It is considered that the inclusion of the Granite County Boundary Stone on the list of Boundary/Mile Stones. Located outside no 50 Whitehall Road should be investigated for addition to the RPS.</p>

	the jurisdiction of Dublin County Council, later to become South Dublin County Council.	<p><b>CE Recommendation:</b></p> <p>To insert a new objective under Policy NCBH19 as follows:</p> <p><i>To investigate the merit of including on the Record of Protected Structures the the Granite Boundary Stone outside No. 50 Whitehall Road</i></p> <p>Should this new proposed objective and the new proposed objective relating to the Road Sign – Bothair An Racadair, Whitehall Road the two structures proposed for assessment should be contained within the one objective under Policy NCBH19</p>
<p>SD-C195-78 Recorder Residents Associarion</p> <p>SD-C195-19 Knocklyon Network</p>	<p>Submission seeks much more effort with regard to the City Waterway. This structure at Balrothery Weir and the Arch in front of Templeogue House should be places of Special Interest.</p> <p>There should be a plan to move water again through the visible part of the Waterway and sluices reconnecting back into the Dodder.</p>	<p><b>CE Response:</b></p> <p>Balrothery Weir (also known as Firhouse Weir is already a protected structure and is listed on the RPS for South Dublin No. 246).</p> <p>Templeogue House and Tower is also listed on the RPS for the County (240)</p> <p>The waterfall does not come under the definition of a 'structure' and therefore is not on the RPS.</p> <p>There are no plans at this time to carry out works on the waterway and sluices.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
SD-C195-109 South Dublin Conservation Society	Ask South Dublin County Council to investigate the merit of including an additional curved embankment as part of the archaeological Complex, Manor, Gatehouse, Mound, Belvedere (Ruin) & Road Site (NM) at Ballymount, Clondalkin.	<p><b>CE Response:</b></p> <p>The existing Gate House (Ballymount Gate House) and Belvedere are listed on the RPS as protected structures. This Archaeological complex is a National Monument Site and The Embankment feature is within the Archaeological complex and protected</p>

		<p>structure site. Therefore, it is considered that this feature is already afforded protection under the current status and individual listing or inclusion in the existing description is not necessary.</p> <p><b>CE Recommendation:</b></p> <p>No change to Drat Plan</p>
SD-C195-109 South Dublin Conservation Society	The Embankment Public House, which is currently listed on the NIAH (11214011). This building should not be demolished and needs to be added to the RPS due to its cultural importance in relation to Irish traditional and balladeering music scene and live events hosted between 1963-1985 for several top Irish musicians. It further suggests that there is a possibility that features may still exist underground associated with the Dublin to Blessington Steam Tramway which had a tram stop at the Embankment.	<p><b>CE Response:</b></p> <p>Permission was granted on this site in May 2021 for demolition of the existing Public House building and of existing incomplete buildings on the east side of the site; construction of a three storey hotel and; 3 three storey Aparthotel buildings. It is not proposed to add the structure to the RPS.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
SD-C195-164 Denise Delappe	Add the Roof of the National Basketball Arena to the RPS	<p><b>CE Response:</b></p> <p>While the architectural value of the roof of the Basket Ball Arena is acknowledged, it is considered premature to place it on the RPS at this time.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan</p>
SD-C195-164 Denise Delappe	Add the Old Bawn Waterfall at Old Bawn Bridge and Balrothery Weir to RPS. Requests Old Bawn Bridge to be cleared of overgrowth so it can be fully visible.	<p><b>CE Response:</b></p> <p>Balrothery Weir is already a protected structure known as Firhouse Weir. The weirs are protected as part of the City water course and they are deemed as structures under the meaning and term 'structure'. Waterfalls are not deemed to be structures in terms of the RPS and relate more to green infrastructure /biodiversity interest therefore it would not be eligible for addition to the RPS.</p>

		<p>The clearance of vegetation is an operational matter and not one for the County Development Plan.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
SD-C195-164 Denise Delappe	Add the Tower at St Maelruains in Tallaght Village to RPS.	<p><b>CE Response:</b></p> <p>The Tower at St Maelruains is already protected as it is part of St. Maelruains Church and Graveyard.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
SD-C195-154 Tallaght Community Council	NCBH19 Objective 7 - NIAH, to update the record with regard to the historical bridge in Sean Walsh park, removed as part of construction of The Weir by SDCC.	<p><b>CE Response:</b></p> <p>NIAH designation is not a function of the Council. However the following report presented to the Tallaght ACM Monday 21<sup>st</sup> June 2021 is noted</p> <p>During the Part 8 process for the construction of 81 older persons homes at Whitestown Way, the existing bridge structure on site was confirmed as not being a protected structure, on the NIAH of South County Dublin (2002) nor ever identified or recommended for inclusion on the Record of Protected Structures (RPS) during previous or current County Development Plans. However, recognising the considerable local interest in the bridge structure, commitments were made to incorporate it into the development to address concerns that a feature of local interest and value would otherwise have been removed to facilitate the construction works and access routes for the new development.</p> <p>The Chief Executive's report on the Part 8 stated the following: "A short section of stone wall and arch is all that remains on site. There is no historical watercourse remaining nor evidence of its original route. The remaining structure is not recorded in the</p>



		<p>National Inventory of Architectural Heritage or in the National Monuments Service Sites and Monument Record. It is also not listed in the SDCC Record of Protected Structures. Notwithstanding this, the structure will be incorporated into site works in the proposed housing development.”</p> <p>While the Council were cognisant of the need to remove, conserve and reinstate the structure as part of the construction programme on this basis, Given the age of the structure it was agreed to dismantle and remove off site for safe keeping.</p> <p>Clúid Housing has confirmed that the bridge material is being properly and securely stored on the contractor’s private compound off site with notification/warning signage in place until such time as the bridge will be reinstated as a feature on the site prior to completion in line with representations from the Council on this matter.</p> <p>While it is intended to reinstate the bridge and adjacent wall materials in the landscaping design of the finished scheme and is proposed to be sensitive to the nature and character of the bridge, in light of the representations received, Clúid Housing will consult with the Council and local community representatives on the specific details of the proposed reinstatement (precise location, design, process and personnel involved) which is scheduled to take place early in 2023. No further action required</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<p>SD-C195-154 Tallaght Community Council</p>	<p>New SLO</p> <p>To support the enhancement of the public realm around the Dry Rampart from the High Street and the car park to the west, recognising that it is in private ownership by Belgard Retail centre. As a significant national monument, it should</p>	<p><b>CE Response:</b></p> <p>Location for insertion of this SLO is not clear (located under Views and Prospects in submission) which would relate more to cultural Heritage.</p>

	be elevated as a prominent feature and to ensure the security of the heritage value in Tallaght village.	<p>The site is in private ownership, ongoing protection for archaeological monuments is the remit of the National Monument Service.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
SD-C195-109 South Dublin Conservation Society	Requests amendment to NCBH9 Objective 5 to include that any development along Grand Canal be accompanied by an assessment by built heritage professional.	<p><b>CE Response:</b></p> <p>Submission requests addition to NCBH9 Objective 5 which requires any development along the Grand Canal to be accompanied by an assessment by a built Heritage Professional.</p> <p><b>NCBH9 Objective 5:</b></p> <p>To ensure that development along or adjacent to the Grand Canal protects, incorporates and enhances built and industrial heritage features, particularly historic canal and mill buildings, and also sets out to protect the setting of such built heritage features.</p> <p>It is considered that the objective provides sufficient protections, noting also that the Conservation Officer of the Council will review any proposed projects with built heritage features.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
SD-C195-265 Deirdre tierney	Seeks to have Glebe House preserved form further damage and restored in line with the policies of NCBH19 Objective 1.	<p><b>CE Response:</b></p> <p>It is assumed that the submission refers to the Glebe House, Rathcoole. The property is a protected structure and is in private ownership. The site is the subject of a long endangerment/enforcement case.. Permission was granted for development within the curtilage of the Protected Structure and for the structures use within the new development. No development has taken place to date and the Council is waiting on an update</p>

		<p>with regard to legal issues. The Council supports the protection of Glebe House..</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<a href="#">SD-C195-222 Tallaght Community Council</a>	New SLO stating, 'scope the options to bring this into public ownership ( or PPP) to develop it as a tourist / recreational amenity - as was done with Peig Sayers house - a rare opportunity to preserve and tell the rural Tallaght story'.	<p><b>CE Response:</b></p> <p>The submission indicates that the new SLO is to be inserted under the heading 'Heritage'</p> <p>It is not clear what structure is referred to in the submission.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<a href="#">SD-C195-213 An Taisce</a>	An Taisce also submits that the objectives under NCBH19 should be amended to include monitoring buildings at risk and using the provision of Section 59 of the Planning Act to serve notices of endangerment to negligent property owners.	<p><b>CE Response:</b></p> <p>Policy NCBH 19 states as follows</p> <p><i>'Conserve and protect buildings, structures and sites contained in the Record of Protected Structures and carefully consider any proposals for development that would affect the setting, special character or appearance of a Protected Structure including its historic curtilage, both directly and indirectly.'</i></p> <p>Serving of notices is provided for under the Planning and Development Act. The monitoring of buildings at risk is addressed by the Architectural Conservation Officer of the Council. There is no requirement to include objectives for same in Draft. Plan.</p> <p><b>CE Recommendation:</b></p> <p>No Change to Draft Plan</p>
<a href="#">SD-C195-19 Knocklyon Network</a>	Considers that the proposed Interpretive centre on Montpelier Hill is a waste of too much Taxpayers money and	<p><b>CE Response:</b></p>

<a href="#">SD-C195-279 Ballyboden Tidy Towns Group</a>	<p>that an opportunity was lost to purchase a much more suitable building and site at the Orlagh Demesne.</p>	<p>The County Development Plan is a strategic land use document. This issue is not relevant to this strategic function. Capital spending is a budgetary matter.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
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**Built Heritage -Architectural Conservation Areas:**

Submission No.	Submission Summary	CE response and recommendation:
<a href="#">SD-C195-225 An Claiomh Glas</a>	<p>The submission considers that Lucan village should be preserved and protected with the provisions of the ACA being upheld</p> <p>The ACA for Lucan should be extended to include traditional stone walls.</p> <p>Supports NCBH21 SLO1 regarding the protection of old stone walls of Clondalkin. Considers that this should be extended or an additional SLO included to protect old stone walls in Lucan.</p> <p>The Development Plan should include further objectives which protect and enhance Lucan Weir/Bridge including design, access and a link with Fingal County Council</p>	<p><b>CE Response:</b></p> <p>The provisions of any ACA are upheld by the Council through the development management and planning processes.</p> <p>Walls are considered as part of the character of any ACA and are already given consideration, their protection and retention is considered as part of any proposed development.</p> <p>Lucan Weir and Bridge are already Protected Structures and therefore no further objectives are required in this regard. It is noted that Lucan is being enhanced as part of the Lucan Village Design Project.</p> <p>Lucan is linked to Fingal via Lucan Bridge.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<a href="#">SD-C195-225 An Claiomh Glas</a>	<p>That an ACA should be considered for Rathcoole Village</p>	<p><b>CE Response:</b></p> <p>Rathcoole Village is already an Architectural Conservation Area. Rathcoole Village was assessed under the previous CDP</p>

		<p>review and an appraisal and assessment was carried out to ascertain if Rathcoole Village should be designated as an ACA. It was recommended at that time and it was agreed and therefore the village area was formally designated as an ACA in 2016 and is listed as such in the current CDP Plan and will remain as such in the new plan.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<b>Chapter 3 Miscellaneous-Natural/Cultural/Built</b>		
<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation:</b>
<a href="#">SD-C195-53 Hellfire Massy Residents Association</a>	<p>The submission highlights that NCBH6 Objective 1 should be omitted as the Dublin Mountains Partnership Strategic Plan 2021-2025 has not been published.</p>	<p><b>CE Response:</b></p> <p><b>NCBH6 Objective 1</b> states as follows;  To support the <i>Dublin Mountains Partnership Strategic Plan (2021-2025)</i> in conjunction with other stakeholders in order to develop co-ordinated and sustainable amenity initiatives for the wider Dublin Mountains, recognising and protecting the ecological, geological, archaeological, and cultural heritage of the Mountain landscape.</p> <p>It is considered that the objective should be amended to support the Dublin Mountains Partnership given that the Dublin Mountains Partnership Strategic Plan has not been published at time of writing.</p> <p><b>CE Recommendation:</b></p> <p><b>Amend NCBH6 Objective 1 as follows from:</b></p> <p>‘To support the <i>Dublin Mountains Partnership Strategic Plan (2021-2025)</i> inconjunction with other stakeholders in order to develop co-ordinated and sustainable amenity initiatives for the wider Dublin Mountains, recognising and protecting the ecological, geological, archaeological, and cultural heritage of the Mountain landscape.’</p> <p>To</p>

		<p>'To support the <b>Dublin Mountains Partnership in conjunction with other stakeholders in the delivery of co-ordinated and</b> sustainable amenity initiatives for the wider Dublin Mountains, recognising and protecting the ecological, geological, archaeological, and cultural heritage of the Mountain landscape.'</p>
<p><a href="#">SD-C195-109 South Dublin Conservation Society</a> <a href="#">SD-C195-154 Tallaght Community Council</a></p>	<p>A submission recommends the appointment of a SDCC Biodiversity Officer to tackle loss of biodiversity and assist in the implementation of the Council's Biodiversity Action Plan 2020-2026 and the Plan should include an objective for SDCC to commit to appointing a Biodiversity Officer.</p> <p>Proposed new SLO looking for the appointment of more heritage staff to enhance and development the potential of the county heritage and biodiversity potentials.</p> <p>The submission further recommends the appointment of a 'Tree/Arboricultural Officer' in assisting adherence to International, EU and national legislation and policy frameworks. The officer would collaborate between residents, community groups, developers and elected members in terms of tree/woodland management. An objective should be included in the Plan to appoint a Tree/Arboricultural Officer'.</p>	<p><b>CE Response:</b> Staffing is an executive function of the Chief Executive. It is not a matter for the County Development Plan.</p> <p><b>CE Recommendation:</b> No change to Draft Plan</p>
<p><a href="#">SD-C195-234 Development Applications Unit</a></p>	<p>The submission from the DHLGH highlights that section 3.3.2 Biodiversity reads "South Dublin County has a rich biodiversity of plants, animals, insect's birds, fish and micro-organisms and their habitats in which they live and interact, such as grasslands, woodlands, streams, hedgerows, treelines, public parks and private gardens", but notes that insects, birds and fish are all animals and therefore recommends that the first sentence is rewritten.</p>	<p><b>CE Response:</b> The content of the submission is noted and agreed.</p> <p><b>CE Recommendation:</b> Amend the first sentence of Section 3.3.2 Biodiversity of the Draft Plan to reword as follows;  South Dublin County has a rich biodiversity of flora and fauna including insects, birds, fish and micro-organisms and their habitats</p>

		in which they live and interact, such as grasslands, woodlands, streams, hedgerows, boglands, public parks and private gardens. All communities are part of nature and everything in nature is connected.
SD-C195-234 Development Applications Unit	<p>Amend text:</p> <p>The submission from the DHLGH highlights that Section 3.3.3 Designated Areas for Nature Protection and Conservation, in the subsection entitled 'Protection of Habitats and Species Outside of Designated Areas', the initial sentence of the first paragraph states "The County supports a range of plant, animal and bird species and their habitats, which are not formally protected under European or Irish legislation." However it should be noted that bird species are animal species, but more significantly all wild bird species occurring in Ireland are protected under the Wildlife Acts, 1976 to 2018; and it is recommended that this sentence should be rewritten to reflect the full legal protection afforded wild birds.</p>	<p><b>CE Response:</b> The content of submission is noted and accepted.</p> <p><b>CE Recommendation:</b> Amend the first paragraph of section 3.3.3 entitled 'Protection of Habitats and Species Outside of Designated Areas' as follows:</p> <p>From The County supports a range of plant, animal and bird species and their habitats which are not formally protected under European or Irish legislation.</p> <p>To The County supports a range <b>of flora and fauna</b> and their habitats which are not formally protected under European or Irish legislation. <b>It is notable however that all wild bird species occurring in Ireland are protected under the Wildlife Acts, 1976 to 2018</b></p>
SD-C195-279 Ballyboden Tidy Towns Group	The submission requests that Ballyboden is recognised as the poetic landscape of the poem 'Easter 1916' by W.B Yeats and that the roads of Taylor's Lane, Scholarstown Road, Whitechurch Road, Ballyboden Road, Stocking Lane tell a unique story of the 1916 Rising and a Heritage Trail should be created as an educational and heritage tool.	<p><b>CE Response:</b></p> <p>The Draft Plan includes EDE20 Objective 2:</p> <p>To support the development of local tourist and heritage trails at suitable locations including across the Dublin Mountains, and between and within Brittas-Saggart-Rathcoole; Clondalkin; Lucan; Newcastle-Lyons; Rathfarnham; and Tallaght and seek to make such trails interactive through the use of sensitive signage and the further development of mobile application software ensuring in HA DM that all such trails are sensitively landscaped and designed to ensure positive impact on biodiversity and visual amenity.</p>

		<p>.It is considered that Ballyboden could be explicitly supported as a place for a heritage trail</p> <p><b>CE Recommendation:</b></p> <p><b>Amend EDE20 Objective 2 to include Ballyboden as follows:</b></p> <p>To support the development of local tourist and heritage trails at suitable locations including across the Dublin Mountains, and between and within Brittas-Saggart-Rathcoole; Clondalkin; Lucan; Newcastle-Lyons; <b>Ballyboden</b>; Rathfarnham; and Tallaght and seek to make such trails interactive through the use of sensitive signage and the further development of mobile application software ensuring in HA DM that all such trails are sensitively landscaped and designed to ensure positive impact on biodiversity and visual amenity.</p>
<p><a href="#">SD-C195-109 South Dublin Conservation Society</a></p>	<p>NCBH 20 SLO 3, a correction is required “famous Dublin Architect TJ Byrne...”.</p>	<p><b>CE Response:</b></p> <p><b>NCBH20 SLO 3</b> states: To assess the houses 1 to 8 in Red Cow Cottages and 1 to 8 Woodfarm Cottages, Palmerstown (that were designed by the famous Dublin Architect Brown, who also designed those in Rathfarnham) with a view to protecting them via an Architectural Conservation Area.</p> <p>Following assessment it is recommended that No’s 1-8 Red Cow Cottages and 1-8 Woodfarm Cottages be designated as ACA’s</p> <p>Therefore, the amendment is not required as the SLO is no longer necessary.</p> <p>The Architectural Conservation report commissioned on foot of the SLO refers to the buildings being in the style of TJ Byrne, text to be amended to reflect this.</p> <p><b>CE Recommendation:</b></p>



		<p>Include No's 1-8 Red Cow Cottages and 1-8 Woodfarm Cottages <b>(in the style of famous Dublin Architect TJ Byrne)</b> as ACA's and add to the list of Architectural Conservation Areas in Section 3.5.3 of the Draft Plan.</p> <p>Remove</p> <p>NCBH20 SLO 3 from the Plan</p>
<p><a href="#">SD-C195-222 Tallaght Community Council</a></p>	<p>Proposed new SLO looking for signposting the Poddle River in Bancroft Park and Tymon Park. Signpost the bridge at the Priory and Bancroft Park.</p>	<p><b>CE Response:</b></p> <p>The submission indicates that the new SLO is to be inserted under the heading 'Heritage'</p> <p>The provisions of EDE20 Objective 2 are noted. It is considered that this objective meets the requirements of this submission. Notwithstanding this the detailed location of signage is an operational matter for the relevant Department of Council taking cognizance of the requirements of the County Signage Strategy.</p> <p><b>EDE20 Objective 2</b></p> <p>'To support the development of local tourist and heritage trails at suitable locations including across the Dublin Mountains, and between and within Brittas-Saggart-Rathcoole; Clondalkin; Lucan; Newcastle-Lyons; Rathfarnham; and Tallaght and seek to make such trails interactive through the use of sensitive signage and the further development of mobile application software ensuring in HA DM that all such trails are sensitively landscaped and designed to ensure positive impact on biodiversity and visual amenity.'</p> <p><b>SM2 Objective 12:</b></p> <p>To support the implementation of the Council's adopted County-wide signage strategy (2020) that accords with the <i>National Traffic Signs Manual</i> and the Failte Ireland '<i>Dublin Visitor Orientation Strategy</i>' (2020) and takes into account the local heritage and history of an area, particularly in a village</p>

		<p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
SD-C195-23 Gary Tyrrell	<p>Directs the council to LEAF Ireland website which is knowledgeable on the development of pocket parks;</p> <p>Coilte's Neighborhood scheme is highlighted as a website for Local Authorities where grants to plant can be applied for;</p>	<p><b>CE Response:</b></p> <p>The information provided in relation to the different websites are acknowledged and welcomed.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
SD-C195-279 Ballyboden Tidy Towns Group	<p>Highlights issues around SDCC's communications, particular in relation to 'biodiversity/green messaging' and sets out a number of proposed actions in relation promoting Environmental Awareness, Climate Action and Biodiversity functions in SDCC. The Ballyboden Tidy Towns &amp; Glendoher and District Residents Association indicate that they would like to work with SDCC to build on their messaging within the community.</p>	<p><b>CE Response:</b></p> <p>The role of the County Development Plan is to provide a countywide strategic policy framework for a wide range of issues including biodiversity. While the submission is welcomed, communications on these matters is a matter for the relevant department of the Council and should be raised directly with them. Direct contact with the Communications Unit of the Council through the Customer Care System is suggested.</p> <p><b>CE Response:</b></p> <p>No change to Draft Plan</p>
SD-C195-109 South Dublin Conservation Society	<p>NCBH16 Objective 3, the Industrial Heritage Survey is not readily available and should be published on the SDCC website. Other objectives under Industrial Heritage are welcomed.</p>	<p><b>CE Response:</b></p> <p>Inclusion of the Industrial Heritage Survey on the Council website will be reviewed.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>

# **Chapter 4:**

## **Green Infrastructure**

## Chapter 4: Green Infrastructure

Chapter 4-Introduction		
Submission No.	Submission Summary	CE response and recommendation
SD-C195-213 <a href="#">An Taisce</a>	<p>The An Taisce submission quotes directly from point 11 of the EU Biodiversity Strategy which states that “Cities with at least 20,000 inhabitants have an ambitious Urban Greening Plan.” The loss of urban green spaces across Europe is noted. The submission notes that the promotion of healthy ecosystems, green infrastructure and nature based solutions should be systematically integrated into urban planning, including in public spaces, infrastructure, and the design of buildings and their surroundings. To help achieve this in 2021 The EU Commission will set up an EU Urban Greening Platform, under a new ‘Green City Accord’ with cities and mayors. This will be done in close coordination with the European Covenant of Mayors.</p> <p>The submission recommends that South Dublin County Council, in cooperation with the other local authorities in the region, put in place the overarching strategic implementation objectives for the Dublin Metropolitan Area to secure the Urban Greening Plan objectives of the EU Biodiversity Strategy to 2030. Within South Dublin An Taisce recommends that implementation be advanced by identifying geographically defined areas such as Tallaght, Clondalkin and Lucan to advance the practical application of Urban Greening Plan objectives with local communities, schools, businesses, sporting clubs and other stakeholders.</p>	<p><b>CE Response:</b></p> <p>The European Platform for Urban Greening aims to increase the knowledge and skills required to address biodiversity, climate adaptation and well-being in the urban, green living environment, and to broaden the expertise among professionals in Europe.</p> <p>The Draft Plan supports the promotion of healthy ecosystems, green infrastructure and nature-based solutions as set out by National and Regional legislation. It also supports the aims of the European Platform for Urban Greening. South Dublin, as a signatory to the European Covenant of Mayors is committed to working at a local level and with other local authorities to secure relevant Urban Greening Plan objectives.</p> <p>The Draft Plan includes, in Chapter 4, a Green Infrastructure Strategy for the County. This sets out core green corridors and key linkages through local corridors and stepping stones. Appendix 4 contains associated objectives to enhance these corridors.</p> <p>In addition to broader greening policy throughout the Draft Plan, the Draft Plan contains a specific section on urban greening in the Green Infrastructure chapter. This includes for an objective to implement an urban greening factor as a tool that evaluates and quantifies the amount and quality of urban greening that a scheme provides to inform decisions about appropriate levels of greening in new developments. This is the first time that South Dublin’s Development Plan has included such an objective in recognition of the increasing need for greening and biodiversity protection.</p> <p>It is also noted that the Draft Plan contains comprehensive policy on the provision of open spaces and the need for these spaces to</p>

		<p>be multi-functional to serve the needs of amenity but also to ensure the protection and enhancement of biodiversity and to incorporate appropriate climate action measures.</p> <p>The Draft Plan provides strong policy support for the implementation of urban greening throughout the County.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
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<b>GI Strategic Theme-Biodiversity</b>		
<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation</b>
<a href="#">SD-C195-284 Clare Hamilton</a>	<p>The Council is requested to do more for Biodiversity and it is pointed out that damage to destroying existing habitats, hedgerows and streamside woodland cannot be undone easily. There are no options for the biodiversity to reconsider their locations but there are options for developers.</p>	<p><b>CE Response:</b></p> <p>The Draft Plan includes comprehensive policy on biodiversity acknowledging that a biodiversity emergency was declared by the Government and the Council.</p> <p>A 'layered approach' has been applied to the Draft Plan preparation process with a focus on facilitating future growth in a manner which protect and enhances the County's natural (including biodiversity), cultural and built heritage, maximises opportunities for the development of the Green Infrastructure network, promotes the highest quality in urban design with the overall aim of delivering healthy places in which to live, work, visit, socialise, and invest in. All of these elements are linked through the integration of Climate Action as a key overarching theme across all aspects of the Draft Plan. Biodiversity is embodied in the existing assets of the County and key policies to protect and enhance biodiversity are central to this overall approach.</p> <p>Relevant policies and objectives include:</p>

		<p><b>G11 Objective 8</b> <i>'To increase over the lifetime of this plan the percentage of land in the County, including residential, managed for biodiversity including supporting the delivery of the objectives of the County Pollinator Plan and to continue to investigate the potential for the use of low-mow methods during the lifetime of the Draft Plan.</i></p> <p><b>Policy G 12</b> - <i>Strengthen the existing GI network and ensure all new developments contribute towards GI, in order to protect and enhance biodiversity across the County as part of South Dublin County Council's commitment to the National Biodiversity Action Plan 2021- 2025 and the South Dublin County Council Biodiversity Action Plan, 2020-2026, the National Planning Framework (NPF)and the East Region Spatial and Economic Strategy (RSES).</i></p> <p><b>G12 Objective 1</b> - <i>To reduce fragmentation and enhance South Dublin County's GI network by strengthening ecological links between urban areas, Natura 2000 sites, proposed Natural Heritage Areas, parks and open spaces and the wider regional network by connecting all new developments into the wider GI Network.</i></p> <p><b>G12 Objective 2</b> - <i>To protect and enhance the biodiversity and ecological value of the existing GI network by protecting where feasible (and mitigating where removal is unavoidable) existing ecological features including tree stands, woodlands, hedgerows and watercourses in all new developments as an essential part of the design and construction process.</i></p> <p><b>G12 Objective 4</b> - <i>Integrate GI, and include areas to be managed for biodiversity, as an essential component of all new developments in accordance with the requirements set out in Chapter 13 Implementation and the policies and objectives of this Chapter.</i></p>
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		<p>It is considered that the approach taken in the the Draft Plan including the policies and objectives as set out above adequately addresses the issues raised in the submission.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
<p>SD-C195-284 Clare Hamilton</p> <p>SD-C195-281 Dublin Friends of the Earth</p>	<p>Submission requests the Council to provide more areas for woodland or meadow development. Only areas designated for sports use should be occupied by manicured tight grass. All other areas should be enabled to transition towards meadow for pollinators or woodland where suitable (through natural reforestation or the fantastic stepping stone forests.</p> <p>Submission is supportive and commends work done by SDCC in relation to wilding public spaces and parks, stating that native flora and fauna species should be protected and facilitated in green spaces throughout the county. An idea raised includes giving Biodiversity a section on the council webpage to make it more identifiable;</p> <p>Planting more native species of trees and plants, with the introduction of insect hotels and incorporation of water features to attract birds;</p>	<p><b>CE Response:</b></p> <p>The Draft Plan contains a number of objectives supporting pollinators and increasing biodiversity across the county. This includes supporting the Pollinator Action Plan as stated in:</p> <p><b>G11 Objective 8</b> <i>'To increase over the lifetime of this plan the percentage of land in the County, including residential, managed for biodiversity including supporting the delivery of the objectives of the County Pollinator Plan and to continue to investigate the potential for the use of low-mow methods during the lifetime of the Draft Plan.</i></p> <p>Particular projects for implementation are an operational matter but are supported in various objectives in the Draft Plan including increasing the tree cover in the County, protecting hedgerows and the protection of habitats and species outside of designated areas.</p> <p><b>G15 Objective 6</b> – <i>To provide more tree cover across the county, in particular to areas that are lacking trees.</i></p> <p>While the suggestion for the Council's website is acknowledged, it is not a matter for the County Development Plan.</p> <p><b>CE Recommendation:</b></p> <p>No Change to Draft Plan</p>
<p>SD-C195-154 Tallaght Community Council</p>	<p>The submission requests an amendment to G11 Objective 8 to add "... in consultation with local residents"</p>	<p><b>CE Response:</b></p> <p><b>G11 Objective 8</b> states 'To increase over the lifetime of this plan the percentage of land in the County, including residential, managed for</p>

		<p>biodiversity including supporting the delivery of the objectives of the County Pollinator Plan and to continue to investigate the potential for the use of low-mow methods during the lifetime of the Plan.</p> <p>This objective is supporting the delivery of the actions and objectives of the County Pollinator Plan 2021-2025. The Pollinator Plan represents the Council’s commitment to promoting habitats for pollinators in the county and addressing the rapid decline in our bee populations. The Council has been taking action to support pollinators on public land and has also been working with local community groups, residents’ associations and schools to help raise awareness of the All-Ireland Pollinator Plan. While specific operational items would not be appropriate for public consultation, a process already exists through which local communities can submit requests for changes to maintenance regimes or proposals for projects.</p> <p>Having regard to the context outlined above within which this matter is addressed through the implementation of the County Pollinator Plan, no change is recommended.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan</p>
<p>SD-C195-154 Tallaght Community Council</p>	<p>G12 Objective 9 - the submission asks why specify “underused perimeters” as it states that negative Impact in Dodder Valley park has created negative knock on effects for residents (anti social behaviour, rodents) living adjoining the perimeters. The submission then requests for the following wording to be included “in consultation with residents living directly on or adjacent to park perimeters”.</p>	<p><b>CE Response:</b></p> <p>G12 Objective 9 states:</p> <p>‘To exploit the full potential of existing underutilised perimeter and border park spaces through the augmentation of wild grasses and other naturally occurring vegetation that enhance local area biodiversity and habitats in support of the National Pollinator Plan and to consider wildflower meadows where beneficial to biodiversity.’</p> <p>The submission proposes to add “in consultation with residents living directly on or adjacent to park perimeters”.</p>



		<p>Projects related to the County Pollinator Plan and grass cutting regimes are an operational matter implemented by the Public Realm Department of the Council and not subject to formal public consultation. However, the impact of existing projects are assessed on an ongoing basis including impact on adjoining areas. Direct contact with the Public Realm Department through the Council Customer Care System is advised on this specific issue.</p> <p><b>CE Recommendation:</b></p> <p>No Change to Draft Plan</p>
<p>SD-C195-109 South Dublin Conservation Society</p>	<p>The inclusion of G12 Objective 10 is welcomed by the submitter, though the use of glyphosates should be banned on all green areas associated with roads too.</p>	<p><b>CE Response:</b></p> <p>In relation to use of glyphosates the existing provisions of <b>G12 Objective 10</b> state:</p> <p>‘To enhance biodiversity and the health of pollinator species by banning the use glyphosphate in or close to public parks, public playgrounds, community gardens/allotments and within residential estates, whether by directly employed Local Authority staff or private contractors.’</p> <p>The use of such chemicals is an operational matter and not a matter for the County Development Plan. However, the partial ban on the use of glyphosate adopted by the Council in May 2017 stops it's use in public parks, playgrounds and public gardens. This is being implemented across the County. Glyphosate continues to be used by the Council's road sweeping contractor in the provision of the weed control element of the services under that contract, this involves the control of weeds on hard surfaces such as footpaths, other paved areas and the roadside kerb. There continues to be some use by Public Realm staff of herbicides to control weed growth around sign poles in grass margins for example, however this has reduced considerably from previous years and is likely to reduce further as alternative methods to control such areas are implemented. Glyphosate based herbicides continue to be used by</p>

		<p>the Council as a critical part of its programme to control and eradicate invasive species.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
<p><a href="#">SD-C195-59 Litter Mugs</a></p>	<p>Submission states that SDCC controls vast tracts of lawn, that is bereft of biodiversity and actually generates CO2 in it's maintenance, looking for this to be converted to wild meadows of native species of grass, plants, and flowers, and converted to forest (Miyawaki Style Forests &amp; Stepping Stones Forests for Schools). SDCC should expand on relevant projects initiated by Tallaght Community Council in school (Stepping Stones Forests for Schools). The key message here is speed and scale</p>	<p><b>CE Response:</b></p> <p>SDCC delivers re-wilding projects on an ongoing basis through the County Pollinator and Biodiversity Action Plan and will continue to do so. Policy in the Draft Plan in relation to pollinators supports this as set out below.</p> <p><b>GI2 Objective 6:</b></p> <p>To continue to support and expand the County Pollinator Plan through the management and monitoring of the County's pollinator protection sites as part of the Council's commitment to the provisions of the National Pollinator Plan 2021-2025.</p> <p><b>GI2 Objective 9:</b></p> <p>'To exploit the full potential of existing underutilised perimeter and border park spaces through the augmentation of wild grasses and other naturally occurring vegetation that enhance local area biodiversity and habitats in support of the National Pollinator Plan and to consider wildflower meadows where beneficial to biodiversity.'</p> <p>These objectives support the delivery of the actions and objectives of the County Pollinator Plan 2021-2025 and an increase in the land area in the county managed for biodiversity. The Pollinator Plan represents the Councils commitment to promoting habitats for pollinators in the county and addressing the rapid decline in our bee populations. The Council has been taking action to support pollinators on public land and has also been working with local community groups, residents' associations and schools to help raise awareness of the All-Ireland Pollinator Plan.</p>

		<p>The Draft Plan also contains policy and objectives on tree cover. <b>GI5 Objective 3</b> includes as part of compliance with the South Dublin Climate Change Action Plan and the provisions of the Council's Tree Management Strategy the identification of suitable sites for new urban trees including Miyawaki style mini woodlands, were feasible</p> <p>It is considered that the issues raised are provided for in the policies and objectives of the Draft Plan.</p> <p><b>CE Recommendation:</b></p> <p>No Change to Draft Plan</p>
<p>SD-C195-145 Moyville residents Association</p> <p>SD-C195-279 Ballyboden Tidy Towns Group</p>	<p>The council are requested that the Draft Plan and Natura Impact Report should strengthen protections for the Owendoher River and recognise its importance for biodiversity in the area.</p> <p>The Council is requested to strengthened Conservation objectives, to protect and enhance the character of the Ballyboden area. The Draft Plan should include objectives that recognise the amenity of streams and the existing green space resources that enhance the natural heritage value of the area, particularly wildlife corridors and linkages between green space and the Owendoher River walkway. Existing natural linear corridors in Moyville should be retained and enhanced for the benefit of birds, bats, and overall biodiversity.</p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted. The Natura Impact Report has been carried out having regard to the Habitat's Directive and relevant national legislation. The role of the NIR is to assess the Draft Plan's policies and objectives against the relevant designated sites, known as Natura sites, and to be satisfied that the Plan will not have, either individually or in combination any significant adverse effect on a European site. It is not the role of the NIR to designate sites for protection as this is done at national and European level. Section 3.3.3 of the Draft Plan sets out policy and objectives on Natura Sites and other protected areas</p> <p>Policy in the Draft Plan is generally strategic in nature so that the policies and objectives are county-wide in their application. As such, objectives and policy relating to biodiversity and flooding are applicable to the Owendoher just as they are to other rivers and areas within the County. The Draft Plan has undergone a Strategic Flood Risk Assessment (SFRA) and the objectives within the Plan reflect the findings of this assessment. This includes the provision for riparian corridors and their protection.</p> <p>The approach taken in the preparation of the Green Infrastructure Strategy is a countywide one which incorporates all elements of GI in the County. The Strategy identifies the Strategic Corridors and</p>

		<p>Cores to which all GI in the County should ultimately connect. In this regard, local corridors are identified in the Draft Plan, Appendix 4, These local corridors provide additional interconnectivity for the county-wide GI network and contribute ecosystem services at the local scale. By linking communities, local parks and public and private open spaces into the wider GI network these corridors will enhance biodiversity, improve access and contribute to local benefits around placemaking, environmental quality, water management and climate change mitigation. Two local corridors are identified along the Owendoher River indicated as L15 and L16 with associated objectives for amenity, biodiversity and water quality. L16 local corridor identifies areas within Ballyboden through which the river flows or connects. In the consideration of proposals for development or future projects and programmes the purpose of the GI Strategy is to facilitate the connection of to the Strategic Corridors and Cores. Streams and rivers within the County such as the Owendoher are all part of the GI infrastructure</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
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<b>GI Strategic Theme-Sustainable Water Management</b>		
<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation</b>
<p><a href="#">SD-C195-154 Tallaght Community Council</a></p> <p><a href="#">SD-C195-234 Development Applications Unit</a></p>	<p>To explore all national and EU funding mechanisms to daylight the Poddle river in the TTCLAP areas to enrich the urban biodiversity value in an area with little existing GI.</p> <p>Submission from the DHLGH commends inclusion of GI3 Objective 4 as this daylighting of previously culverted streams will aid considerably in restoring overall stream water quality.</p>	<p><b>CE Response:</b></p> <p>DHLGH welcoming of GI3 Objective 4, to uncover existing culverts where appropriate, is noted.</p> <p>GI3 Objective 4 of the Draft Plan states as follows;</p> <p>‘To uncover existing culverts where appropriate and in accordance with relevant river catchment proposals to restore the watercourse to acceptable ecological standards for biodiversity wherever</p>

		<p>possible improving habitat connection and strengthening the County's GI network.'</p> <p>The Planning Authority is supportive of uplifting the Poddle. However, it is noted that the exact location of the source of the Poddle and its route underground through Cookstown/The Centre, needs to be established having regard to multiple landownerships in the area. This matter was considered in detail during the consultation on and making of the Tallaght Town Centre Local Area Plan. It was considered during that process that the proposal to uplift the Poddle would be most practically achieved through the development management process as sites come forward for development. Objectives to support this approach are contained in the detailed phasing and Neighbourhood detail of the Tallaght Local Area Plan and in GI3 Objective 4 of the Draft Plan.</p> <p>It is considered that the Draft Plan in GI3 Objective 4 is sufficiently supportive of uncovering existing culverts and restoring ecological standards and biodiversity.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<p>SD-C195-222 Tallaght Community Council</p>	<p>Submission seeks the inclusion of the following SLOs in the Draft Plan:</p> <ul style="list-style-type: none"> <li>- Inclusion of a new SLO to restore Tallaght wetland (SWP) and clarify a tourism enhancement plan for greater viewing facilities for park users, schools and nature tourists.</li> <li>- Inclusion of a new SLO to propose that the Tallaght wetlands and all the South West end of Sean Walsh Park (Phase 2) are retained for passive recreation only and parkland only.</li> </ul>	<p><b>CE Response:</b></p> <p>Following liaison with both the NPWS and the EPA, the Council has completed over a year of ecological surveying of the area including monitoring water table levels. Habitat Management Plans, based on the ecological surveys and site surveys are currently being finalised and will inform the further rehabilitation of this area. The proposed SLOs are premature in the absence of the finalised management plans for the area.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>

	<p>- Inclusion of a new SLO to produce and monitor a plan to restore and manage the Tallaght wetlands, collaborate with local experts.</p> <p>- Inclusion of a new SLO to produce and deliver a landscaping plan for phase 2, engaging with local residents.</p>	
<p><a href="#">SD-C195-109 South Dublin Conservation Society</a></p>	<p>G14: add in an objective that in existing private houses, front drives/gardens can only be completely paved in SuDs compliant surfaces. It could be made a bye-law that householders must notify the Council if intending to pave or re-pave their whole front garden and drive. Carry out a survey of existing housing to find out how many/what proportion have a non-porous surface covering their whole front garden/drive</p>	<p><b>CE Response:</b>  Policy GI 4 provides policy and supporting objectives around the provision of appropriate SuDS measures, recognising their importance for water quality and climate change. GI4 Objective 1 requires new development to be designed in accordance with the South Dublin SuDS guidance and evaluation document which is being progressed by the Council. The guidance and evaluation document is being prepared by experts in the field of surface water and flood management. This document will include guidance where appropriate for the use of permeable or porous surfaces among other techniques for sustainable water management. The policies set out in Section 4.2.3 of the Draft Plan supports the implementation of the SDCC SuDS guidance document and and relevant measures to manage surface water.. These measures will be implemented through the Development Management Process having regard also to Chapter 13 of the Draft Plan.</p> <p>The matter of surveys of properties is an operational one for the relevant department while bye-laws are not a matter for the Development Plan.</p> <p><b>CE Recommendation:</b>  No change to the Draft Plan</p>
<p><a href="#">SD-C195-269 John O'Leary</a></p>	<p>The council is requested to turn its attention to the Camac river/basin and the upper hinterland e.g. Lugg, Brittas Ponds, Slievethoul and to set-out and complete feasibility studies and programmes to maintain and enhance.</p>	<p>The Draft Plan includes a Green Infrastructure Strategy. The strategy identifies six strategic GI corridors. The Camac River Corridor is identified as Corridor 5 and has a number of overarching objectives set out within it. These are listed in section</p>

		<p>4.3.2 of the Draft Plan and include the enhancement of the GI network by addressing habitat quality issues along the Camac River and by identifying and including additional 'stepping stone' opportunities along it.</p> <p>River corridors are recognised as major short and long term Green Infrastructure assets of the County. Where viable project opportunities arise the Council works with other stakeholders to enable and further their delivery while protecting the amenity and GI value of the relevant river corridor. Project opportunities differ depending on the location and character of the specific river corridor. As part of this process the impacts of projects such as greenways (walking and cycling routes) and of relevant planning applications are assessed and inputs made where appropriate. Where projects or planning applications may affect the corridor or where there are opportunities to better connect these corridors and improve the GI connections these issues are addressed by the relevant departments of the Council. Where opportunities for the progression of projects similar to those carried out on the Dodder present themselves, they will be progressed.</p> <p>In relation to Brittas Ponds, the inclusion of QDP12 SLO1 provides for a planning study and study boundary for Brittas Village, to support it as a sustainable community and to assess the potential for tourism activities including Brittas Ponds.</p> <p>It is considered that the Draft Plan contains policy and objectives to deal with the matters raised insofar as they are within the remit of the County Development Plan.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan recommended.</p>
<p>SD-C195-251 Cllr Trevor Gilligan PC</p>	<p>The council are requested to create an SLO to allocate sufficient funding to complete a flood risk assessment for Saggart and to fund the CE Recommendation:s of this</p>	<p>Water services section of the Council are preparing to go to tender for a surface water strategy to be carried out for the Newcastle Saggart and Rathcoole areas.</p>

<p>SD-C195-64 Saggart Village Residents' Association</p>	<p>assessment towards restoring and protecting existing biodiversity, ecosystems and drain systems.</p>	<p>This study will help plan optimum surface water routes and infrastructure for current and future development and will address all aspects of surface water management in these areas.</p> <p>The Draft County Development Plan contains sufficient policies and objectives to support the study and appropriate SuDS measures including their multi-functional role in protecting water quality and enhancing biodiversity.</p> <p>The allocation of funding is not a matter for the County Development Plan.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
<p>SD-C195-23 Gary Tyrrell</p>	<p>The following issues of importance were raised in this submission about GI:</p> <ul style="list-style-type: none"> <li>&gt; Potential grants/incentives for building green roofs and green walls;</li> <li>&gt; consider incorporating ideas on park design from examples in Denmark, where some parks are also rain gardens with fantastic SUDs to help adapt to our new flood risks;</li> <li>&gt; Provide Amphitheatre's in SDCC which can form a part of the GI infrastructure in the County.</li> </ul>	<p><b>CE Response:</b></p> <p>Policy GI 4 Objectives 1 to 4 in the Draft Plan require the provision of SuDS in the County and the maximisation of the amenity and biodiversity value of these systems. <b>GI 4 Objective 6</b> requires the maintenance and enhancement of surface water drainage systems in the County and promotes and facilitates the development of SuDS in the County 'including integrated constructed wetlands, at a local, district and County level, to control surface water outfall and protect water quality.'</p> <p>The Public Realm Department of the Council has historically taken a leading role in the incorporation of flood risk management and related measures into ongoing park development in the County. SuDs measures are integral to South Dublin' park design approach. There are a number of integrated constructed wetlands in the County with more in the planning process. There are also many examples of swales, detention basins and permeable paving.</p> <p>Recreational and amenity features located in GI corridors and parks across the County are designed to be sympathetic to their surroundings. Inspiration is taken where appropriate from national and international experience. It is noted that Amphitheatre seating</p>



		<p>has been used recently in two new teenspaces in the County at Collinstown Park and Tandy's Park (Public Realm).</p> <p>The County Development Plan is a strategic county level document and the provision of grants/incentives for specific measures are not within its remit. The Draft Plan supports the provision of green walls/roofs and similar measures under the themes of sustainable water management and climate resilience set out in Section 4.2.2 and 4.2.3 of the Draft Plan while GI 5 Objective 7 requires the provision of green roofs and green walls as an integral part of SuDS measures.</p> <p>It is considered that the Draft Plan contains sufficient policy to provide for the sort of measures and experience from other countries as part of sustainable water management within the County and as evidenced from a number of projects completed and underway the County will continue to be forward thinking in its approach.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
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<b>GI Strategic Theme-Climate Resilience</b>		
<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation</b>
<a href="#">SD-C195-59 Litter Mugs</a>	<p>The council should be reacting to the climate change crisis by doing all in its power to mitigate this global problem.</p>	<p><b>CE Response:</b></p> <p>The concerns raised in relation to the climate crisis are noted and acknowledged.</p> <p>The County Development Plan is a strategic landuse document and its role is to support and enable the delivery of strategic landuse objectives which reflect European and National policy. Mitigation of Climate Change is a core theme of all these policies spanning, biodiversity, green infrastructure, sustainable movement,</p>

		<p>placemaking and sustainable development through ensuring development takes place in a way that maximises our limited land resources. The Draft Plan reflects these policies at the County level, helping to enable and delivery the tangible results of the Climate Action approach on the ground in our county through the plans, projects and programmes across local authority services.</p> <p>In order to deliver this a ‘layered approach’ has been applied to the Draft Plan preparation process with a focus on facilitating future growth in a manner which protects and enhances the County’s natural cultural and built heritage, maximises opportunities for the development of the Green Infrastructure network, promotes the highest quality in urban design with the overall aim of delivering healthy places in which to live, work, visit, socialise, and invest in. All of these elements are linked through the integration of Climate Action as a key overarching theme across all aspects of the Draft Plan. The resulting strategy based on the compact growth approach is designed to address the challenging issues around climate change, housing, sustainable development and protection of our natural environment which face us in the coming years.</p> <p>The Development Plan will set the land use planning policy for the County for the years 2022-2028 and is equally applicable to the private and public sectors, including all departments within the Council.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
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<b>GI Strategic Theme-Recreation and Amenity (Human Health and Wellbeing)</b>		
<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation</b>
SD-C195-154 Tallaght Community Council	The Council is requested to amend and add the following objectives to the Draft Plan:	<p><b>CE Response:</b></p> <p>The submission seeks to add wording to GI3 Objective 3. This objective relates to the need to protect riparian corridors having</p>

	<p>-G13 Objective 3 - to add "allowing for some sensitive viewing / access points along the riverbanks to support visibility and accessibility of the valued amenity – sight, sound and full sensory experience".</p> <p>-G16 Objective 5 - to add "formal and informal viewing, fishing spots".</p> <p>- Addition of G1 1 Objective 9: To support human engagement and access to rivers and waterways when considering planning applications adjacent to riparian corridors along the Dodder (Aarhus Agreement).</p> <p>Under Overarching Principles, the following is requested to be added: To consider and support human engagement and access to rivers and waterways while planning and planting riparian corridors along the Dodder (recognising the EU Aarhus Convention)</p>	<p>regard to their role in flood mitigation and the need to protect river banks. To add the wording in this objective would distract from the purpose of the objective as it relates to flooding and surface water.</p> <p>However, a new objective could be added to Policy G16 to address the various amendments requested for G13 Objective 3, G16 Objective 5 and G11 Objective 9 and the requested addition to overarching principles.</p> <p><b>CE Recommendation:</b></p> <p><b>Add new objective under Policy G16 to read:</b></p> <p>'To support appropriate human engagement including the sensory experience of rivers and waterways, through access to viewing points and fishing spots, having regard to the primary need for environmental and biodiversity protection'</p>
<p>SD-C195-154 Tallaght Community Council</p>	<p>G16 Objective 4 – with regards to Access to multi-functional green open space, the submission queries how will this apply to apartments and closed courtyard amenity spaces.</p>	<p><b>CE Response:</b></p> <p>Open space policy is set out under section 8.7 of the Draft Plan within Chapter 8 Community Infrastructure and Open Space. The plan sets out, in Table 8.1, a hierarchy of open space from regional parks down to civic spaces/squares. The catchment areas to be served by each park in the hierarchy is set out as is a description of the main features of each type of park. Quantitative open space requirements are also set out in the Draft Plan whereby 15% of an overall site area is to be set aside for open space in RES-N zoned land and 10% set aside in areas zoned RES. A Parks and Open Space Strategy has been prepared in parallel to the Draft Plan and has ensured that an overall standard of open space can be achieved of 2.4 hectares for every 1000 persons, in line with international best practice. It would not be feasible for every type of open space to be accommodated in every development given the size and function of the different types of open space. However,</p>

		<p>the Plan provides for different open space types to be accessible to all within their neighbourhood area or, for regional parks, within 5km of all homes. These requirements will be applied through the Development Management Process</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<p>SD-C195-154 Tallaght Community Council</p>	<p>Request for allotments in Tallaght town centre within high density areas where individual gardens are not available to residents.</p> <p>The submission also asks that on Page 150, text be amended as follows: The council manages allotments at Tymon Park, Friarstown in Tallaght, Corkagh park in Clondalkin....”</p>	<p><b>CE Response:</b></p> <p>The Draft Plan includes the provisions of <b>GI6 Objective 10</b> which states:</p> <p>‘To continue to protect and promote existing allotments and provide for new allotments where feasible in accordance with a review of the provision and management of allotments across the County.’</p> <p>In relation to Tallaght Town Centre, the following Key Objective of the Tallaght Town Centre Local Area Plan is also noted.</p> <p>The Town Park (Section 3.9 of the Tallaght Town Centre Local Area Plan,</p> <p><i>TP 9: ‘To investigate potential for the provision of an urban farm and inclusion garden allotments in the Sean Walsh Park or within reasonable distance thereof.’</i></p> <p>The provisions of the Draft Plan and the Tallaght Town Centre LAP are considered appropriate and sufficient.</p> <p>The proposal to amend text relating to allotments to list the Tallaght allotments (page 150 of Draft Plan) together and change ‘Friarstown in Bohernabreena’ to ‘Friarstown in Tallaght’ in the text is accepted.</p> <p><b>CE Recommendation:</b></p>

		<p>The Council manages allotments at Tymon Park in Tallaght, Corkagh Park in Clondalkin, Friarstown in Bohernabreena and Mill Lane in Palmerstown.</p> <p>Amend to</p> <p>The Council manages allotments at Tymon Park <b>and Friarstown in Tallaght</b>, Corkagh Park in Clondalkin, and Mill Lane in Palmerstown.</p>
<p>SD-C195-237 Caitriona McClean</p>	<p>The submission seeks the planned provision of allotments to be associated with apartment building to allow families far greater access to opportunities to connect with the environment and to enjoy outdoor living should they so choose but have no garden of their own.</p>	<p><b>CE Response:</b></p> <p>The Draft Plan includes the provisions of <b>GI6 Objective 10</b> which states:</p> <p>'To continue to protect and promote existing allotments and provide for new allotments where feasible in accordance with a review of the provision and management of allotments across the County.'</p> <p>The provision of allotments and their distribution across the County is managed by the Public Realm Department of the Council and their staff. The provision of allotments by the Council linked with individual apartment developments would not facilitate equal access to such facilities where they are provided by the Council.</p> <p>It is considered that the Council has a strategy for the provision of allotments which is supported by the Draft Plan. The location of allotments is an operational issue having regard to demand and availability of suitable locations.</p> <p><b>CE Recommendation:</b> No Change to Draft Plan</p>

Submission No.	Submission Summary	CE response and recommendation
SD-C195-68 Peter Meighan	Multiple Submissions request amendments to the Green Infrastructure Strategy as part of overall proposals in respect of Rathcoole Woodlands	On foot of the inclusion of CS10 SLO1 in the Draft Plan the Council has commissioned a study for these lands the outcome of which is the Framework Concept and Zoning Proposals document which is contained in Appendix 2A and 2B of this CE Report. The zoning proposals have provided for the rezoning of the majority of the woodland area from RES-N to RU and the rationale and CE Recommendation: for this is contained within the CE Response: to issues raised in the OPR submission, treated separately in the beginning of this Part of the CE Report and in the Core Strategy Chapter 2 section of this report.  The Framework Concept and Zoning Proposals document addresses the issues raised in the submissions relating to the future development of this area and potential impact on the biodiversity and amenity of the area. The CE Recommendation: that the woodlands are rezoned to RU – Rural is accompanied by a SLO to state:  <i>To ensure the protection and augmentation of the identified alluvial woodlands within the zoning RU, and in recognising their value as green infrastructure and the potential linkages to Lugg Woods and Slade Valley and other amenity areas, provide for sensitive passive amenity uses which have regard to their Annex 1 status</i>  With regard to the Green Infrastructure issues the following is noted.  In respect of the current green wildlife corridor between Saggart and Rathcoole and existing and proposed links to other stepping stones on the Camac River Corridor the provisions of <b>GI7 SLO 1 and GI7 Objective 4</b> are noted.  <b>GI7 SLO 1</b> The current green wildlife corridor between Saggart and Rathcoole be maintained and the need to preserve this wildlife corridor be incorporated into the design and development plans for Rathcoole park.
SD-C195-196 Ne Graver	-To designate Rathcoole Woodlands and its environs as a space for Nature and Biodiversity under the Green	
SD-C195-199 Sally Graver	Infrastructure and Parks and Open Space.	
SD-C195-71 Kamila	-Incorporate all of Rathcoole Woodlands and its environs as is (CS10 SLO1 area), into the Green Infrastructure Strategy as a pivotal GI Core with Rathcoole Park and Swiftbrook Mill	
KOZLOWSKA		
SD-C195-72 Gordon Place	Ponds along the Camac Valley GI Corridor linking to Slade	
SD-C195-85 Joe Magee	Valley and Crooksling Glen pNHA, Lugg Woods and the	
SD-C195-94 Georgina	Rural Fringe Corridor.	
SD-C195-94 Georgina	Amend Strategic Corridor 5: Camac River Corridor to	
SD-C195-96 Frances	include Rathcoole Woodlands as a core area on the corridor.	
SD-C195-96 Frances	Mallon	
SD-C195-101 Vincent Tsoi	Also under Objectives associated with Core Areas/Stepping	
SD-C195-102 Orla Daly	Stones within Strategic Corridor 5: Camac River:	
SD-C195-165 Kerron Ó	Remove Bullet 2:	
SD-C195-165 Kerron Ó	To support the development of a masterplan for the zoned	
SD-C195-190 Joan Brennan	lands at Rathcoole and implement the	
SD-C195-196 Ne Graver	CE Recommendation:s.	
SD-C195-191 Debbie	and add new bullet:	
SD-C195-191 Debbie	To retain and enhance Rathcoole Woodlands as a protected	
SD-C195-199 Sally Graver	high-amenity site, and to investigate	
SD-C195-220 Niall Healy	potential opportunities to link it to existing and proposed	
SD-C195-199 Sally Graver	recreational trails at Lugg Woods and	
SD-C195-220 Niall Healy	Slade Valley.	
	-Amend G17 SLO 1 which refers to Rathcoole Woodlands	
	linking it to the outcome from CS10 SLO 1	

SD-C195-248 Four Districts Woodland Habitat Group	The current green wildlife corridor between Saggart and Rathcoole be maintained and the need to preserve this wildlife corridor be incorporated into the design and development plans for Rathcoole park and is considered in the outcome from CS10 Rathcoole SLO 1 and Rathcoole Woodlands.	<p><b>GI7 Objective 4:</b> ‘To develop Rathcoole Woodlands as part of a wider nature/walking trail from Saggart to Lugg Woods subject to the protection of its biodiversity, wildlife and ecological value which is of primary importance’.</p>
SD-C195-252 Cllr Trevor Gilligan PC		<p>It is considered that these objectives, alongside the proposed rezoning and SLO for the lands, address the issues raised in the submissions. However, the inclusion of the wording of GI7 Objective 4 into the objectives for the core area and stepping stones within the Camac corridor would reflect the objectives already within the Draft Plan. The requirement to reference CS10 SLO1 as part of GI7 SLO1 is not considered appropriate as if the rezoning proposals are agreed then CS10 SLO1 will no longer be relevant and will be removed from the Draft Plan.</p>
SD-C195-270 alistair mullan	- To incorporate all of Rathcoole Woodlands as is, into the Green Infrastructure Strategy as part of a wider nature/walking trail from Saggart to Lugg Woods and a significant core area.	<p>The Strategic Corridor identified as Corridor 5: Camac River Corridor sets out overarching objectives for the corridor and identifies core areas and stepping stones with associated objectives. A submission has requested the amendment of the identified core areas to include Rathcoole woodlands. As it stands, Corkagh Park is identified as a Core Area with Rathcoole Park identified as one of a number of stepping stones alongside Lugg Forest, Slievethoul/Slade Valley and open spaces within Citywest and Kilcarbery. Given the size of the woodlands, it is considered that they are more properly identified as a stepping stone and should be included in that list. It should be noted that the inclusion of the woodlands as a stepping stone rather than as a core area does not in any way diminish their habitat or amenity value and that the objectives associated with both apply.</p>
SD-C195-278 Seán Healy		<p>The request to include Rathcoole woodlands and its environs (CS10 SLO1 area), into the Green Infrastructure Strategy as a pivotal GI Core with Rathcoole Park and Swiftbrook Mill Ponds along the Camac Valley GI Corridor linking to Slade Valley and Crooksling Glen pNHA, Lugg Woods and the Rural Fringe Corridor is noted. It is considered that the amendments to the zoning proposed under CS10 SLO1 will provide for the woodlands to be recognised as part of the wider GI network. The specific</p>
SD-C195-280 Susan Healy		
SD-C195-248 Four Districts Woodland Habitat Group		
SD-C195-255 Ne Graver		
SD-C195-269 John O'Leary		

		<p>identification of the woodland as a stepping stone alongside Lugg and Slade Valley and other areas is recognition of this. It is also noted that the Draft Plan in Appendix 4 contains a series of local corridors to link into the strategic corridors and core areas. This is demonstrated on the Green Infrastructure Map, Figure 4.4 in the main document of the Draft Plan and Figure A4.1 in Appendix 4. Local corridor L7 is shown extending from Rathcoole Park to link with other local corridors and with other strategic corridors within the County and beyond. It is considered that this local corridor should be extended to include Rathcoole woodlands and a corresponding new objective inserted.</p> <p>A further submission requests the replacement of the second bullet point in the list of objectives for the core area and stepping stones within the Camac Corridor as follows:</p> <p>Objective (bullet) 2  -To support the development of a masterplan for the zoned lands at Rathcoole and implement the CE Recommendation:s.</p> <p>to</p> <p>- To retain and enhance Rathcoole woodlands as a protected high-amenity site, and to investigate potential opportunities to link it to existing and proposed recreational trails at Lugg Woods and Slade Valley.</p> <p>This is considered to be appropriate subject to an amended wording as follows:</p> <p>- investigate potential opportunities to link woodlands at Rathcoole to existing and proposed recreational trails at Lugg Woods and Slade Valley</p> <p>It is considered that the CE Recommendation:s for the proposed zoning changes set out in the CE Response: to the OPR's submission will ensure the protection of the woodlands to the</p>
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		<p>greatest extent possible and that the further CE Recommendation:s contained in this CE Response: will address issues around the explicit recognition of the woodlands as part of the GI network.</p> <p><b>CE Recommendation:</b></p> <p>Amend objective (bullet) 2 on Strategic Corridor 5: Camac River Corridor, Objectives associated with the Core Areas/Stepping Stones as follows from:</p> <p>Objective (bullet) 2  -To support the development of a masterplan for the zoned lands at Rathcoole and implement the CE Recommendation:s.</p> <p>Amend to  Investigate the potential opportunities to link woodlands at Rathcoole to existing and proposed recreational trails at Lugg Woods and Slade Valley.</p> <p>Insert a new objective into Strategic Corridor 5: Camac River Corridor, Objectives associated with the Core Areas/Stepping Stones as follows:</p> <p><i>To include woodlands at Rathcoole as part of a wider nature/walking trail from Saggart to Lugg Woods subject to the protection of its biodiversity, wildlife and ecological value which is of primary importance</i></p> <p>And to insert 'Rathcoole Woodlands' into the description of the local corridor L7 so that it reads from:</p> <p>L7 – Citywest-Saggart Link  Rathcoole Park – Citywest Golf Club – Green space at Cooldown Commons –Coldwater Commons – Green space for development adjacent Fortunestown Luas Stop – Citywest Village Green – Citywest Ave green space – Roadstone Quarry</p>
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		<p>To</p> <p>L7 – Citywest-Saggart Link  Rathcoole Woodlands - Rathcoole Park – Citywest Golf Club –  Green space at Cooldown Commons –Coldwater Commons –  Green space for development adjacent Fortunestown Luas Stop –  Citywest Village Green – Citywest Ave green space – Roadstone  Quarry</p> <p>With a new objective 'To provide connections between Rathcoole  Woodlands and Rathcoole Park as part of a wider walking trail in  the area.</p>
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<b>GI Corridors</b>		
<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation</b>
<a href="#">SD-C195-284 Clare Hamilton</a>	Submission welcomes the provision of GI corridors along the Dodder, Camac and Liffey Rivers but submits that there are a multitude of smaller streams worthy of inclusion in the GI strategy and these areas should be ring fenced to Biodiversity and GI protection and enhancement.	The contents of the submission are noted. Reference is made to the need to include all streams not just those which are recognised as corridors within the GI Strategy. The approach taken in the preparation of the GI Strategy is a countywide one which incorporates all elements of GI in the County. The Strategy identifies the Strategic Corridors and Cores to which all GI in the County should ultimately connect. In the consideration of proposals for development or future projects and programmes the purpose of the GI Strategy is to facilitate the connection of any GI elements on any site proximate to stepping stones or to create a stepping stone within the site itself ultimately connecting to the Strategic Corridors and Cores. The GI Strategy also includes for local corridors linking to the primary corridors, these local corridors include many of the smaller rivers and streams within the County and are set out in Appendix 4 of the Draft Plan with accompanying objectives. Streams within the County are all part of our GI infrastructure, the purpose of the Strategy is to enable the better connection of all its elements.

		<p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<p>SD-C195-154 Tallaght Community Council</p>	<p>Queries the reason for Tallaght getting fewer stepping stones than other core areas and the reason for Sean Walsh Park not to be included as a Stepping Stone Park with Kiltipper Park given the green corridor linkage it provides from the TTC area to Glenasmole.</p> <p>Queries why Bancroft Park is not included as a stepping stone as it is a key connector to Tallaght village and TTC area, and requests its addition</p> <p>Include SLO To enhance the Dublin Mountain Way trailhead and first 2 km of the route from Tallaght.</p> <p>Under Overarching Objectives, the following is asked to be added: "... on either side of M50 corridor and linkages across the N81 to Dodder Valley".</p>	<p><b>CE Response:</b></p> <p>The Green Infrastructure Strategy has been prepared at a County level, the assessment is a cross county one. In respect of Sean Walsh Park and Bancroft Park Appendix 4 of the Draft Plan includes the following;</p> <p><b>L10 Tallaght Dublin Mountains Link</b></p> <p><b>Open space just east of Citywest Shopping Centre (Fortunestown LAP) – Grounds of Mount Seskin Community College – Killinarden Community School grounds – Killinarden Park – Whitestown Steam– Sean Walsh Memorial Park – Dodder Valley Park - Sean Walsh Memorial Park – Kiltipper Park - Boharnabreena</b></p> <p>The L10 Corridor represents a combination of green and blue infrastructure elements. It commences in Citywest and from Jobstown Road follows the route of the Whitestown Stream, which flows east to join the River Dodder at Dodder Valley Park and incorporates a variety of public, private and institutional open spaces including Sean Walsh Memorial Park. Though the corridor includes Killinarden Park and terminates at the Dodder Valley Park, the corridor largely comprises smaller areas and pocket parks interspersed amongst the residential areas at Citywest and Millbrook Lawns, which help provide a continuous network of open space. Tree planting along the banks of Whitestown Stream also allow the corridor to traverse Whitestown Industrial Estate. A second branch of the L10 corridor runs southward towards the foothills of the Dublin Mountains, linking Sean Walsh Memorial Park, Kiltipper Park and Boharnabreena.</p> <p><b>L9 – Tallaght-Templeogue</b></p>

		<p><b>Jobstown Park and Butler Magee Park – Open space at Springfield– Tallaght University Hospital – Public Lands at Belgard Square- Tallaght ZIP – TU Tallaght Campus – Bancroft Park – Tallaght Community School Grounds – Tymon Park</b></p> <p>The L9 Corridor also represents a combination of local green and blue infrastructure. Following the course of the River Poddle through to Tymon Park it helps bridge the gap between the M50 and Camac River Primary Corridors, connecting open spaces within the built-up area of Tallaght eastwards through to Tymon Park and across the M50 to Templeogue. To the west beyond Jobstown the corridor connects to the L9 Corridor via green spaces located along the R136.</p> <p>The final request for addition to the overarching objectives on the M50 Corridor seems to request addition to existing objective as follows;</p> <p>To enhance connectivity between existing parks and open spaces on either side of the M50 corridor and linkages across the N81 to Dodder Valley.</p> <p>It is considered that the above adequately addresses the issues raised in the submissions.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<p><a href="#">SD-C195-154 Tallaght Community Council</a></p> <p><a href="#">SD-C195-109 South Dublin Conservation Society</a></p>	<p>In Appendix 4, L8-Belgard Quarry-M50 Corridor: add in a SLO that the lands immediately north of Ballymount Park earmarked as a graveyard should be left in a wild state and an alternative site on other parts of Ballymount should be used instead to create a woodland cemetery.</p> <p>Appendix 4, Page 11, L8 – Belgard Quarry-M50 Corridor: Add in a Specific Local Objective that the lands immediately to the north of Ballymount Park, currently earmarked as a</p>	<p><b>CE Response:</b></p> <p>It is recognised that the lands with an objective to ‘Protect and/or Provide for a Burial Ground to the northeast of Newlands Cemetery have self-wilded over the years. The lands are in private ownership and provide for an extension to the existing cemetery. The current designation (To protect and/or provide for a burial ground) with the land zoned for Open Space uses is considered necessary and appropriate. Should a planning application be received for a</p>

	<p>graveyard, should be left as they are in a wild state, currently frequented by skylarks. A different site on other parts of Ballymount should be used instead (though not any species-rich calcareous grasslands) to extend the graveyard in the form of a woodland cemetery, only using native trees.</p>	<p>graveyard it would be considered on its merit while taking into account that the existing ecology and habitats on the land.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<p>SD-C195-234 Development Applications Unit</p>	<p>The submission from the DHLGH has highlighted that the Dublin Mountains is a core area within the Green Infrastructure of the County and Chapter 4 should mention that the Wicklow Mountain National Park is in this part of the County.</p> <p>The submission from the DHLGH acknowledges that linkages of hedgerows between features such as playing fields, golf course and open spaces will contribute significantly to supporting the County's biodiversity.</p>	<p><b>CE Response:</b></p> <p>The DHLGH have welcomed the GI Strategy in the Plan and the significant contribution that it can play in supporting the County's biodiversity.–</p> <p>The issues raised in the submission are noted. References to the official title of Wicklow Mountain National Park should be included within the Draft plan as outlined the Draft Plan be amended accordingly.</p> <p><b>CE Recommendation:</b></p> <p>Amend Chapter 4 text to include direct reference to Wicklow Mountain National Park where relevant.</p> <p>Amend text as follows 'Dublin Mountains' to' Dublin Mountains within the Wicklow Mountains National Park'</p> <p>Section 4.2.4 Paragraph 2</p> <p>4.3.1</p> <p>In description of corridors where text reads 'Dublin Mountains' amend to 'Dublin Mountains incorporating part of Wicklow Mountains National Park'</p> <p>Section 4.3.2 Table 4.1</p>

		Corridor 1: Dodder Valley Amend list of core areas from Dublin/Wicklow Mountains to Dublin Mountains within Wicklow Mountains National Park.
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Trees		
Submission No.	Submission Summary	CE response and recommendation
<p>SD-C195-284 Clare Hamilton</p> <p>SD-C195-154 Tallaght Community Council</p> <p>SD-C195-281 Dublin Friends of the Earth</p>	<p>States that trees along our waterways should be protected and notes that where development is proposed and tree surveys required existing trees are defined as damaged or of low value and therefore suitable for removal. If left these trees would enable regrowth and improve overtime their biodiversity value. If they are removed to facilitate development this re-growth is impossible. This submission requests the Council to provide more areas for woodland or meadow development.</p> <p>Believes guidance and hard standards for the specification of trees to ensure that they are of decent size and quality should be introduced, with standards and quotas (like what is done for bicycle or car parking within most planning grants) could also be set to achieve a minimum number or area (if providing mass planting of young forest/woodland) of trees/whips, therefore future canopy cover, for new developments.</p> <p>Submission states that SDCC should look at the implementation of a 'tree balance sheet' for new developments, which would ensure that existing mature trees and hedgerows of good condition are replaced with high quality specimens of appropriate size and similar species.</p>	<p><b>CE Response:</b></p> <p>The default position of SDCC is to retain trees where possible rather than removing trees with lower amenity value which could have high ecological value. The arborists report provides information on the condition and status of trees, they do not provide information on the habitat value of trees.</p> <p>In this context the provisions of Section 13.3.2 of the Draft Plan dealing with Ecological Protection is noted. This requires that relevant planning applications demonstrate how areas of biodiversity value are protected and how biodiversity is enhanced. Section 13.3.2 of the Draft Plan section also requires the submission of a Green Infrastructure Plan for development sites in addition to Landscape Plans and requires the submission of an overall site summary quantifying the extent of tree and hedgerow removal, retention and additional tree and hedgerow planting. This in effect is a 'tree balance sheet' but requires more information on existing site GI features.</p> <p>In addition, the Draft Plan contains specific objectives relating to the protection of trees includes:</p> <p><b>GI2 Objective 5 states as follows;</b> <i>To protect and enhance the County's hedgerow network, in particular hedgerows that form townland, parish and barony boundaries recognising their historic and cultural importance in</i></p>

	<p>GI5 Objective 3 – to add a minimum girth for all tree planting to safeguard survival and carbon sequestering productivity of mature trees over saplings</p> <p>GI5 Objective 6 - to add in ambitious tree cover increase targets that prioritise the areas with lowest cover first each year in the planting schedule.</p>	<p><i>addition to their ecological importance and increase hedgerow coverage using locally native species including a commitment for no net loss of hedgerows on any development site and to take a proactive approach to protection and enforcement.</i></p> <p><b>Tree Canopy</b>  The value of trees in delivering carbon sequestration is undisputed. Tree canopy cover in the County has been assessed based on data provided by UCD, see Figure 4.1, Chapter 4 of Draft Plan. The Draft Plan notes that it is highly desirable that the extent of this canopy should be extended during the lifetime of the Development Plan. Where considered appropriate objectives supporting additional planting are included in the relevant neighbourhood areas set out in Chapter 12 of the Draft Plan. <b>GI5 Objective 3: bullet 1</b> is also noted;  <i>To ensure compliance with the South Dublin Climate Change Action Plan and the provisions of the Council’s Tree Management Strategy.</i></p> <p><i>‘Increase the County’s tree canopy cover by promoting annual planting, maintenance preservation and enhancement of trees, woodlands and hedgerows within the County using locally native species and supporting their integration into new development.</i></p> <p>And GI5 Objective 6  <i>To provide more tree cover across the county, in particular to areas that are lacking trees.</i></p> <p>The detail of tree standards and specifications including girth are not matters for the County Development Plan which is a strategic landuse document. These are matters for the Public Realm Department through their relevant management plans and policy documents and will differ depending on situation being assessed.</p> <p><b>CE Recommendation:</b>  No change to Draft Plan.</p>
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<p>SD-C195-109 South Dublin Conservation Society</p>	<p>The Council are requested to make an amendment to G12 Objective 2, which includes “(and mitigating with like for like by volume/weight of native bushes and trees where removal is unavoidable)...”. This is to avoid an immediate, undesirable deficit in habitat and carbon storage.</p>	<p><b>CE Response:</b>  <b>G12 Objective 2 states:</b>  To protect and enhance the biodiversity and ecological value of the existing GI network by protecting where feasible (and mitigating where removal is unavoidable) existing ecological features including tree stands, woodlands, hedgerows and watercourses in all new developments as an essential part of the design and construction process.</p> <p>It is proposed to amend the objective by changing (and mitigating where removal is unavoidable) to <i>(and mitigating with like for like by volume/weight of native bushes and trees where removal is unavoidable)</i></p> <p>Mitigation measures, including G12 Objective 2 are contained within the Draft Plan, concentrating on retention as the first course of action and mitigation where loss is unavoidable. The measures proposed would be very difficult in practical and technical terms and from a horticultural perspective would be difficult to achieve. It is considered that the Draft Plan contains policy to support mitigation where necessary and which can be implemented in the most appropriate way on a site by site basis.</p> <p>In addition, <b>NCBH11 Objective 3:</b> states as follows;</p> <p>‘To protect and retain existing trees, hedgerows, and woodlands which are of amenity and/or biodiversity and/or carbon sequestration value and/or contribute to landscape character and ensure that proper provision is made for their protection and management taking into account <i>Living with Trees: SouthDublin County Council’s Tree Management Policy (2015-2020)</i> or any superseding document and to ensure that where retention is not possible that a high value biodiversity provision is secured as part of the phasing of any development to protect the amenity of the area.’</p> <p><b>CE Recommendation:</b></p>
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		No Change to Draft Plan
SD-C195-281 Dublin Friends of the Earth  SD-C195-59 Litter Mugs	<p>Would like to advocate for the adoption of the Miyawaki method of forestry, which grows mature native forests 10 times faster and 100 times more biodiverse than conventional plantations.</p> <p>Submission would like to see the plan providing for the planting of huge numbers of Miyawaki forests right across the County in a speedy fashion.</p>	<p><b>CE Response:</b> The Draft Plan includes a number of objectives supporting the Miyawaki method of planting.</p> <p>The Council is currently trialling Miyawaki woodland development in Sean Walsh Park and have been promoting use of this type of planting on development sites. The following objectives of the Draft Plan are noted.</p> <p><b>G11 Objective 1:</b> To establish a coherent, integrated and evolving GI Network across South Dublin County with parks, open spaces, hedgerows, trees including public street trees and native mini woodlands (Miyawaki-Style), grasslands, protected areas and rivers and streams and other green and blue assets forming strategic links and to integrate and incorporate the objectives of the GI Strategy throughout all relevant land use plans and development in the County.</p> <p><b>G11 Objective 7:</b> To develop linked corridors of small urban 'Miyawaki' native mini-woodlands, a minimum of 100sqm in size, to capture carbon and encourage biodiversity in suitable existing built-up areas, in low grade parkland, and other areas of zoned lands where deemed suitable and appropriate.</p> <p><b>G15 Objective 3:</b> To ensure compliance with the South Dublin Climate Change Action Plan and the provisions of the Council's Tree Management Strategy. - Increase the County's tree canopy cover by promoting annual planting, maintenance preservation and enhancement of trees, woodlands and hedgerows within the County using locally native species and supporting their integration into new development.</p>

		<ul style="list-style-type: none"> <li>- Identify suitable sites for new urban trees including Miyawaki style mini woodlands, where feasible.</li> <li>- Support the implementation of a co-ordinated regional approach to the maintenance of trees and support the work of the Regional Steering Group on Tree Management to which South Dublin County Council is a participant.</li> <li>-Promote the establishment of tree trails in public parks across the County.</li> <li>- Promote the planting of new woodlands and forestry within appropriate open space and park locations within the County.</li> <li>- To plant “pocket forests” in tracts of open grassland to act as an oasis for biodiversity.</li> <li>- The Council recognises the value of mature trees in terms of carbon sequestration and amenity over saplings</li> </ul> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<p>SD-C195-279 Ballyboden Tidy Towns Group</p> <p>SD-C195-109 South Dublin Conservation Society</p> <p>SD-C195-154 Tallaght Community Council</p>	<p>Notes that hedgerows appear to have no protection in the SDCC local authority area.</p> <p>Requests additional text to be added to G16 Objective 9: “To conserve existing road hedges, both on public land and private property, and ensure that they are not replaced with non-native species.”</p> <p>Submission refers specifically to the value of the following hedgerows and seeks their retention;</p> <p>Timmon laneway hedgerow, Kiltipper Road Ballymanna Lane, Horan’s Lane.</p>	<p><b>CE Response:</b></p> <p>The Draft Plan includes a range of objectives relating to the protection of biodiversity across the County including trees and hedgerows. Some of these provisions are set out below.</p> <p><b>G16 Objective 9:</b> states:</p> <p>‘To investigate the potential to plant hedgerows along roads to help mitigate noise and air pollution, and to increase visual amenity and enhance biodiversity’</p> <p>It is considered that the provisions of the Draft Plan adequately address the issues raised.</p> <p><b>G12 Objective 5</b> ‘To protect and enhance the County’s hedgerow network, in particular hedgerows that form townland, parish and barony boundaries recognising their historic and cultural importance in addition to their ecological importance and increase</p>

		<p>hedgerow coverage using locally native species including a commitment for no net loss of hedgerows on any development site and to take a proactive approach to protection and enforcement.'</p> <p><b>GI1 Objective 1:</b></p> <p>To establish a coherent, integrated and evolving GI Network across South Dublin County with parks, open spaces, hedgerows, trees including public street trees and native mini woodlands (Miyawaki-Style), grasslands, protected areas and rivers and streams and other green and blue assets forming strategic links and to integrate and incorporate the objectives of the GI Strategy throughout all relevant land use plans and development in the County.</p> <p><b>NCBH11 Objective 3:</b> states as follows;</p> <p>'To protect and retain existing trees, hedgerows, and woodlands which are of amenity and/or biodiversity and/or carbon sequestration value and/or contribute to landscape character and ensure that proper provision is made for their protection and management taking into account <i>Living with Trees: SouthDublin County Council's Tree Management Policy (2015-2020)</i> or any superseding document and to ensure that where retention is not possible that a high value biodiversity provision is secured as part of the phasing of any development to protect the amenity of the area.'</p> <p>It is considered that the provisions of the Draft Plan in respect of hedgerow protection are adequate and that additional text is not required to GI6 Objective 9.</p> <p>The County Development Plan is strategic landuse document the policies of which relate to the County as a whole. It is not appropriate to name individual hedgerows and the strong policy on hedgerow protection as indicated above is relevant.</p> <p><b>CE Recommendation:</b></p>
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		No change to Draft Plan
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Chapter 4-Miscellaneous		
Submission No.	Submission Summary	CE response and recommendation
SD-C195-133 CAIRN Plc	<p>With regard to provisions set out under 13.3.2, it is submitted that the requirement that all development proposals shall be accompanied by a 'Green Infrastructure Plan' should be omitted as the detail is overly prescriptive and that a Landscape Masterplan is a more appropriate method to ensure that a mix of tree species is included to augment the Green Infrastructure network.</p> <p>The submission recommends that the 'Greening Factor' ratio is overly complex and not necessary as a well-prepared high-quality Landscape Masterplan can provide a suitable mechanism to ensure that the GI network is enhanced in individual proposals.</p>	<p>The Draft Plan contains a robust Green Infrastructure Strategy within Chapter 4 and Appendix 4, identifying major and other core areas, primary and secondary corridors and stepping stones and associated objectives. This forms a key 'layer' of the Plan and it is considered that it is appropriate for all development to demonstrate how it conforms to the GI Strategy. In this regard, a green infrastructure plan will be required to demonstrate how GI considerations have informed the design concept of any planning application. They will show the site in its wider context and demonstrate how the proposed development meets with the objectives of the GI Strategy. A landscape plan can show how the GI Plan has been incorporated into the landscaping for the site but it does not typically inform the layout and design concept and would not demonstrate how the site sits in its context within the wider GI network or delivers the GI objectives. It is noted that smaller developments, extensions or single houses, may incorporate their GI Plan into a landscape plan.</p> <p>The submission also considers the 'greening factor' ratio to be overly complex. Section 4.2.3 of the Draft Plan on climate resilience includes <b>GI5 Objective 4</b> which states: To implement an urban greening factor for all new developments subject to an appropriate scoring mechanism being developed for the County based on best international standards and its appropriate application to the unique features of the County. Developers will be required to demonstrate how they have</p>

		<p>achieved urban greening targets based on the scoring mechanism developed through relevant interventions as part of the proposed development. (See Chapter 13 <i>Implementation and Monitoring</i>).</p> <p>Urban greening factors are recognised as an important tool to evaluate and quantify the amount and quality of urban greening that a scheme provides. It is implemented in many cities throughout the world and an objective to implement it in South Dublin is considered to be appropriate and proactive not only as an amenity benefit but also in the fight against climate change.</p> <p>Having regard to the above, it is considered that the requirements outlined in the Draft Plan are appropriate.</p> <p><b>CE Recommendation:</b></p> <p>No Change to Draft Plan</p>
<p>SD-C195-284 Clare Hamilton</p>	<p>Submission expresses concern that South Dublin County Council will not provide the resources to protect waterways as set out in the policy and objectives of the County Development Plan. The submission acknowledges the work that community groups play in cleaning and protecting existing waterways. It is noted in particular that littering along the waterways of the County is a huge issue and the Council to date has not provided the resources to address the issue depending on the activities of voluntary organisations.</p>	<p><b>CE Response:</b></p> <p>The concerns expressed in the submission are noted and the work of voluntary groups acknowledged. However, the Council has employed and continues to employ considerable resources in the management of litter and in working with community groups and environmental groups in assisting in these efforts. In 2021 the Council published a litter management plan which aims to address litter management across a range of environments.</p> <p>The Draft Plan provides supporting policy for waste management in Chapter 11 section 11.5 but the matter of implementation and issues with particular areas as identified in the submissions is an operational one which does not fall within the remit of the Development Plan.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
<p>SD-C195-59 Litter Mugs</p>	<p>Submission notes that the amount of domestic and industrial litter and waste that exists in the county is injurious to our natural environment. Images of waste collected by a small group of volunteers along a small stretch of the Whitestown stream, and over a relatively short period of time are included in the submission. The submission notes that the</p>	

	Whitestown Stream feeds directly into the Dodder, a vitally important natural asset in the County. It is also noted that this type of environmental damage is being replicated all over the SDCC area. Clearly the previous litter and waste management plans have not worked. A radical new approach to the problem is required as a matter of urgency.	
SD-C195-154 Tallaght Community Council	<p>Requests the Council as follows</p> <ul style="list-style-type: none"> <li>- To work with neighbouring farmers in Kiltipper Park to ensure adequate park boundaries to ensure the security of farm animals who graze nearby.</li> <li>- To work with farmers in Tallaght adjacent to Kiltipper Park and Glenasmole valley to ensure the security of their working farms.</li> </ul> <p>Butler McGee Park: Requests the development plan to increase tree planting, hedgerows and water features (wetlands) to improve the amenity and diversity value of this park to complement the existing sports facilities.</p>	<p><b>CE Response:</b></p> <p>The detail of park boundaries and interface of farms with the public realm are an operational matter for the individual departments of the Council and are outside of the remit of the County Development Plan. Specific queries should be raised through the customer care system of the Council. It is noted that where issues arise adjacent to Parks the Public Realm Department seeks to work with landowners.</p> <p>The request in relation to McGee Park is an operational matter for the Public Realm Department of the Council under its remit in relation to the management of parks. However, it is noted that a Parks and Open Space Strategy is being developed by the Council which will inform the management of parks and open spaces.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
SD-C195-249 Bairbre Brennan	<p>This submission recognises the need for housing development and requests that consideration be given to protecting existing green infrastructure from being designated for infill developments, in recognition of the important role it plays in combating climate change, as outlined in the plan.</p> <p>Smaller residential open spaces provide a local recreational space for existing residents in keeping with the stated aim of providing solutions within a 10 minutes walk or cycle, and, as noted in the report, are stepping stones to the overall</p>	<p><b>CE Response:</b></p> <p>The value of different types of open space is recognised in the Draft Plan and a hierarchy of public open space is identified in Table 8.1 indicating their function and typical features, including how they might relate to Green Infrastructure. However, there are instances where sites are suitable for infill, particularly those which are well served by public transport in existing urban areas. In these instances, it is important that housing can be provided to ensure that the compact approach to development, a key aim of the Draft Plan, can be achieved. However, the level of open space to</p>

	<p>green network. Particularly for older residents and young families, nearby smaller residential open spaces are a vital amenity.</p>	<p>accommodate such development would be assessed as part of any planning application having regard to policy set out section 8.7 and the associated Table 8.1. Under section 13.3.3 of the Draft Plan, all development, infill or otherwise, will be required to demonstrate how it can contribute to the protection or enhancement of the Green Infrastructure in the County through the provision of green infrastructure elements. Having regard to the above, it is considered that the Draft Plan contains appropriate policy and safeguards to ensure that the levels of open space meet the needs of the population.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
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# **Chapter 5:**

## **Quality Design and Healthy Placemaking**



## Chapter 5: Quality Design and Healthy Placemaking

Density and Building Heights		
Submission No.	Submission Summary	CE response and recommendation
SD-C195-133 CAIRN Plc	The submission supports the design led approach to Height which is set out in the South Dublin County's Building Height and Density Guide (BHDG) and is in favour of the commentary that the approach to building heights in South Dublin County Council 'will be driven by its context', which is in line with the Urban Development and Building Height Guidelines and specifically SPPR1 which prohibits numerical limitations on building height by planning authorities.	<p><b>CE Response</b></p> <p>The submission is noted and acknowledged.</p> <p><b>CE Recommendation</b></p> <p>No change to the Draft Plan.</p>
SD-C195-140 Landmarque Property Group	<p>The submission indicates they are owners of the ABB Site, Belgard Road, Tallaght, Dublin 24 and are currently preparing an application for residential development at the subject lands. The subject lands are located within the boundaries of the Tallaght Local Area Plan 2020.</p> <p>The submission highlights that the Draft Plan requires that all apartments shall comply with the Specific Planning Policy Requirements (SPRRs the standards set out under Appendix 1, and general contents of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities, DECLG (2020) (Apartment Guidelines). However, the submission raises concerns that the Draft Development Plan has set out additional requirements that may conflict with the Building Height Guidelines.</p> <p>The submission notes related QDP8 Objective 1 and QDP8 Objective 2 within Chapter 5 'Quality Design and Healthy Placemaking' and the four-step approach guide. It is contended that the Guide appears to provide additional requirements for assessment but no blanket restrictions as</p>	<p><b>CE Response</b></p> <p>The submission raises concerns regarding the requirements of South Dublin's Building Height and Design Guide (BHDG) contained within Appendix 10 of the Draft Plan and submits that they may conflict with the Section 28 Building Height Guidelines.</p> <p>The issue of additional assessment criteria brings in the Premier Dairies judgement (High Court Judicial Review [2020] IEHC 356) which established that the Building Height Guidelines require applicants not only to demonstrate that the criteria of SPPR 3 have been addressed, but also that an appropriate response to them has been incorporated into the design of the development proposal. The judgement in effect requires a reasoned justification of proposed increased height by means of demonstration that the proposal has been designed not only to mitigate any negative impact on the existing urban environment but in fact makes a positive contribution.</p> <p>BHDG Sections 2.2 through 2.4 specifically addresses the points raised by the submission in detail, and justifies the development of additional assessment criteria in response to the Premier Dairies Judgement: <i>'It follows that such a demonstration must begin with a contextual analysis of the urban fabric of the receiving environment of the development proposal at the scale appropriate to the increased height proposed,</i></p>

	<p>per the Building Height guidelines prepared by the Department. The submission submits that the 'South Dublin Building Heights and Density Guide' and accompanying objectives within Chapter 5 of the Draft Development Plan are not consistent with national policy. The submission considers that the 'Plan Approach' incorporates a range of criteria in addition to those set out at Section 3.2 of the Building Height Guidelines and therefore it is contended that it cannot be considered consistent with current Section 28 Guidelines published by the Department of Housing, Planning &amp; Local Government. Moreover, the submission highlights that Section 5.2.7 of Chapter 5 sets out a range of considerations including: the 4 step process, building height terminology, context driven approach to height, and landmark buildings which result in requirements that are highly subjective and add unnecessarily to the requirements for preparing an application for additional height.</p> <p>The submission contends that the building height policy is not fully consistent with national policy in a number of important respects (through the introduction of additional requirements beyond the Section 28 Guidelines) and in any event the performance-based criteria approach in the guidelines remains applicable</p> <p>The submission requests revision of Chapter 5 Section 5.2.7 and 'Appendix 10: South Dublin Building Heights and Density Guide' in order to provide a more simplified document and closely aligned with Section 28 Urban Development and Building Height Guidelines for Planning Authorities (2018) in particular the criteria, principles and specific assessments. Specifically, the submission requests that South Dublin Building Heights and Density Guide be revised with to align more closely with SPPR 3 by omitting additional assessment criteria for building height beyond that set out in the Urban Development and Building Height Guidelines.</p>	<p><i>before proceeding to describe how the proposal will make a positive contribution to the urban fabric at that scale'.</i></p> <p>The BHDG is consistent with the Building Height Guidelines and relevant SPPR's and has been specifically tailored to guide applicants through their demonstration that the requirements of SPPR 3 in particular have been met to the satisfaction of the Planning Authority having regard to the Premier Dairies judgement.</p> <p><b>CE Recommendation</b></p> <p>No change to the Draft Plan.</p>
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Introduction		
Submission No.	Submission Summary	CE response and recommendation
SD-C195-170 Dublin Cycling Campaign	The submission suggests changing “pedestrian movement” to “walking and cycling” in the sentence “It is the aim of this plan to achieve an efficient use of land with a focus on key urban centres, and to achieve development densities that can support vibrant, compact, walkable places that prioritise pedestrian movement.”	<p><b>CE Response</b></p> <p>The submission is noted and the proposed amendment as requested is considered reasonable.</p> <p><b>CE Recommendation</b></p> <p>Replace ‘pedestrian movement’ with ‘walking and cycling’ on page 22 and page 174 of the Draft Plan.</p>

Plans/Frameworks		
Submission No.	Submission Summary	CE response and recommendation
SD-C195-12 NIALL BYRNE  SD-C195-145 Moyville residents Association	The submissions propose that the Ballyboden Village Plan should be reintroduced for the area and that proposed road improvements should be combined as part of the plan.	<p><b>CE Response</b></p> <p>The submission is noted and acknowledged.</p> <p>The Draft Plan includes provisions under QDP14 SLO 2 To prepare a new Local Area Plan for Ballyboden. It is considered that QDP14 SLO 2 satisfactorily addresses this request.</p> <p><b>CE Recommendation</b></p> <p>No change to the Draft Plan.</p>
SD-C195-34 Lisa Maher	<p>The submission seeks a Village Plan for Whitechurch. It is submitted that a plan should include for the c.4Ha (10 acres) of land bounded by Whitechurch Green, Whitechurch Walk, Glenmore Court, Palmer Park, Pearse Brothers Park and Glenmore Park. It is noted that the land subject to this submission is currently used for a School, Church, ESB Sub-station and Shopping Centre plus any miscellaneous public land.</p> <p>It is submitted that a Village Plan should allow at a minimum for the re-development of everything currently in that location together with duplex housing. The submission</p>	<p><b>CE Response</b></p> <p>The submission is noted.. It is noted that the school, church, sub-station and shopping centre are in ownership outside the control of the planning authority.</p> <p>However, the Draft Plan sets out policy, objectives and guidance in respect to the healthy placemaking and the enhancement and improvement of public realm generally including:</p> <ul style="list-style-type: none"> <li>• Section 5.2.3 Healthy Placemaking</li> <li>• Section 5.2.5 Public Realm</li> </ul>

	<p>highlights that this area in general is underdeveloped and emphasises that the Shopping area, in particular, is run down and in need of maintenance. It noted in the submission that there have been numerous attempts to get work carried out with the relevant stakeholders and it is contended that if a Village Plan was detailed in the Development Plan it would allow for progress to be made to these lands involving all stakeholders.</p>	<ul style="list-style-type: none"> <li>Section 13.4.5 Healthy Placemaking and Public Realm: (At the Neighbourhood Level)</li> </ul> <p>In addition, the Draft Plan also contains a range of policies and objectives to support the development of successful and sustainable neighbourhoods throughout the County. Under Policy QDP2: Overarching - Successful and Sustainable Neighbourhoods, QDP2 Objective 1 and QDP2 Objective 2, all new development will be required to implement 'The plan approach'.</p> <p>This approach aims to ensure that all development is designed and developed around eight key principles with the aim of ensuring every opportunity is harnessed to drive and support the vision for South Dublin County to create attractive, connected and functional places to live, work, visit, socialise and invest in</p> <p>In addition, under QDP3 Objective 1 the Council is committed to ensuring that new development contributes in a positive manner to the character and setting of the immediate area in which a proposed development is located taking into consideration the provisions set out in Chapters 3 and 4 of this Plan and having regard to the requirements set out in Chapter 13 <i>Implementation and Monitoring</i> in relation to design statements.</p> <p>Under the 'The Plan Approach' Compliance Report and Design Statement requirements, as set out under Section 13.4.2 of the Draft Plan, all planning applications for development must demonstrate how the proposal constitutes a positive urban design response to the local context and how it contributes to placemaking and the identity of an area.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
<p><a href="#">SD-C195-64 Saggart Village Residents' Association</a></p>	<p>The submissions set out a vision for Saggart village and objectives that are considered important to securing that vision including a Local Area Plan, an area of green space, improved road infrastructure, the protection and promotion of its rich heritage, sufficient community spaces and leisure facilities reflective of the needs of the community.</p>	<p><b>CE Response</b></p> <p>The submission is noted. Saggart is recognised as being one of the nine historic villages in the County and separate to Fortunestown.</p>

<p>SD-C195-251 Cllr Trevor Gilligan PC</p>	<p>The submissions suggest that Saggart be linked with Rathcoole, Newcastle and Brittas and have a Local Area Plan created for these similar villages, separate to the Fortunestown Local Area Plan in order to ensure that Saggart is not overdeveloped.</p>	<p>The Draft Plan includes a specific policy and set of objectives pertaining to future growth and development in Saggart which is set out under Section 2.7.2 as a Self-Sustaining Town as follows:</p> <p><i>Policy CS8: Saggart</i></p> <p><i>Support the sustainable long-term growth of Saggart by focusing growth within and contiguous to the village core to create a critical mass of population and jobs based on local demand and the ability of local services to cater for sustainable growth levels.</i></p> <p><i>CS8 Objective 1:</i></p> <p><i>To facilitate the commencement and completion of development on zoned residential lands within and contiguous to the settlement boundary facilitating connections to the village core and other areas to provide for active travel and the provision of necessary open space and community amenities in close proximity.</i></p> <p><i>CS8 Objective 2:</i></p> <p><i>To support well-designed infill development along the main street and core village area of Saggart.</i></p> <p><i>CS8 Objective 3:</i></p> <p><i>To proactively support and promote the highest levels of services, social infrastructure, facilities, retail and economic activity to meet the needs of current and future growth in line with the scale and function of Saggart within the settlement hierarchy.</i></p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
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<p>SD-C195-112 John Spain Associates</p>	<p>Submission seeks an amendment to QDP 14 SLO 1 in that the wording "...that ensures that phasing is not contravened..." be deleted.</p>	<p><b>CE Response</b></p> <p>This submission is seeking an amendment to QDP14 SLO1 which states:</p> <p><i>QDP14 SLO 1:</i></p> <p><i>To ensure the sustainable long-term growth of Citywest that promotes and facilitates the development of the Citywest/Fortunestown area in accordance with the Fortunestown Local Area Plan ensuring that phasing is not contravened and that appropriate levels of services, social and sports infrastructure, facilities and economic activity is met to meet the needs of the current and future population growth.</i></p> <p>The amendment is to remove "ensuring that phasing is not contravened" from the SLO. In this regard, it is not considered appropriate to remove the reference to phasing in the SLO. The Council is committed under CS3 Objective 6 to ensuring the phased development of new housing areas in tandem with the delivery of physical and social infrastructure provision as identified within Local Area Plans or as informed by assessments carried out by the Planning Authority.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
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<p>SD-C195-112 John Spain Associates</p>	<p>Submission seeks the inclusion of the following SLO under QDP14 "To support the provision of a landmark building of up to 12 storeys in the environs of the Luas stop at Fortunestown". Submission refers to the southern part of the Cairn lands in Citywest (as indicated in Figure 1 in the submission) which partially fall within the district centre designation of the Fortunestown LAP. It is considered an appropriate location for a proposed landmark building. In this regard, it is respectfully submitted that the delivery of a taller building at this site would achieve the ambitions of the Fortunestown LAP by creating a key focal point clearly visible in the wider suburban landscape, close to the Luas stop and District Centre, providing legibility and framing this important central point within the wider Fortunestown area.</p>	<p><b>CE Response</b></p> <p>The submission seeks the inclusion of a new SLO "To support the provision of a landmark building of up to 12 storeys in the environs of the Luas stop at Fortunestown".</p> <p>The Draft Plan, including the South Dublin County Building Height and Density Guide (Appendix 10) provides at a County wide level the policy basis and toolkit to employ the delivery of increased building height and density at appropriate locations, including detailed assessment criteria in relation to the development of Primary and Secondary Landmarks and Local Markers.</p> <p>For this reason, the inclusion of the proposed new SLO in the Draft Plan is not considered appropriate.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
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<p>SD-C195-112 John Spain Associates</p>	<p>The Submission supports Policy CS1 and CS1 Objective 1.</p> <p>The submission also supports the recognition in the Draft Plan to Fortunestown as a new district identified for residential growth and welcomes the allocation of 2,833 units for the Citywest area as set out in the Core Strategy. In addition, submission notes that the Citywest area is identified as part of the Dublin City and Suburbs in the RSES Settlement Hierarchy.</p> <p>The submission notes the Draft Plan's reference to Fortunestown/Citywest area as a relatively new district developing at a significant pace and subject to a Local Area Plan and one of the most active areas in terms of the delivery of housing for the County during the period 2016-2022.</p> <p>The submission further notes that the Draft Plan acknowledges Fortunestown/Citywest's proximity to the Citywest Business park which "has facilitated the delivery of housing and jobs beside each other which is supported by the Red Luas Line" and that the Draft plan indicates that "The delivery of commensurate levels of social and physical infrastructure to match recent and continued growth will be promoted in this area."</p>	<p><b>CE Response</b></p> <p>It is noted that the submission supports Policy CS1 and CS1 Objective 1 and the recognition in the Draft Plan to Fortunestown as a new district identified for residential growth. It is also noted that the submission welcomes the allocation of 2,833 units for the Citywest area as set out in the Core Strategy and notes that the Citywest area is identified as part of the Dublin City and Suburbs in the RSES Settlement Hierarchy.</p> <p><b>CE Recommendation</b></p> <p>No change to Plan.</p>
<p>SD-C195-54 Transport Infrastructure Ireland</p>	<p>The submission welcomes and supports consultation during the preparation of any future Framework or Masterplan processes and draws SDCC's attention to the provisions of both the DoECLG Local Area Plan Guidelines and DoECLG Sustainable Residential Development in Urban Areas Guidelines.</p> <p>The primary issue, in this regard, relates to the absence of appropriate statutory plan-led evidence-based planning and the absence of future liaison with TII in relation to planning exercises promoted by the local authority that may have significant implications for the national road network in the area concerned.</p>	<p><b>CE Response</b></p> <p>The contents of the submission are noted.</p> <p>As per the Draft Plan, the purpose of preparing Framework plans and Masterplans is to act as a preliminary design guide for the future development of lands within the County. As per 5.4.3 Framework/Masterplans, these plans set out a framework for future development of the relevant area and are informed by background research and baseline analysis, identifying opportunities for future development and possible constraints. The background research and gathering of baseline data involves consultation with relevant stakeholders, such as TII, that have an interest in the future development of the lands.</p>



	<p>TII suggest the following amendment to objective QDP16 Objective 1: To prepare Framework Plans or Masterplans on identified lands to ensure a co-ordinated approach to delivery ensuring that they are structured in a logical, clear and comprehensible manner demonstrating and providing the background to the land use and design methodology and having due regard to the context of such lands. <b>The Framework Plans or Masterplans shall be subject to appropriate public and stakeholder consultation and will be incorporated into the Local Area Plan or County Development Plan by the variation process.</b></p> <p>In addition, TII suggest consultation during the preparation of the Framework Plans or Masterplans where there may be implications for the national road network in the area.</p>	<p>It should be noted that under SM1 Objective 7, the Draft Plan commits to engagement with relevant agencies including the National Transport Authority (NTA) and Transport Infrastructure Ireland (TII) in relation to strategic and local transportation issues including delivery of transport projects and to encourage consultation with local communities.</p> <p>It is also noted that a new objective is proposed under Section 5.4.3 Framework/Masterplans as follows:</p> <p><i>QDP16 Objective 4:</i></p> <p><i>To consider the need for a Local Transport Plan to be prepared as part of any Framework/Masterplan, commensurate to the scale of the Framework/Masterplan.</i></p> <p>Therefore, it is considered that the provisions of the Draft Plan including Section 5.4.3, QDP16 Objective 1 and SM1 Objective 7, as well as the proposed new objective, QDP16 Objective 4 comprehensively address the issues raised.</p> <p><b>CE Recommendation</b></p> <p>Proposed new objective under QDP16 Objective 4 as follows:</p> <p><i>QDP16 Objective 4:</i></p> <p><i>To consider the need for a Local Transport Plan to be prepared as part of any Framework/Masterplan, commensurate to the scale of the Framework/Masterplan. The Framework/Masterplan will be subject to screening for AA and SEA.</i></p>
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<p>SD-C195-222 Tallaght Community Council</p>	<p>The submission proposes an SLO be included in the plan that identifies the need to afford village status to Old Bawn and Jobstown due to their traditional residential hamlets/villages from the 19th century.</p>	<p><b>CE Response</b></p> <p>This submission is noted. Jobstown and Old Bawn, like much of what is now suburban Dublin, once formed rural farming communities. However, neither of them has a strong urban form which would identify them as having an established village layout through, for instance, street patterns or a mixed use building stock. Those areas that have a village zoning within the County all have a strong historic and defined urban form. Having regard to this, it is considered that the designations in the Draft Plan and the current plan of local centre more accurately reflect the modern urban form and retail offer of Jobstown and Old Bawn.</p> <p>The policies of the Draft Plan on urban design and quality apply to local centres just as they do to villages. For example, the 'Plan Approach' requirement of the Draft Plan requires developers to consider qualitative and quantitative aspects of any development in its wider context. Similarly the many objectives to ensure sustainable communities and healthy placemaking contained in Chapter 5 Quality Design and Healthy Placemaking apply to all areas within the County.</p> <p>Having regard to the above, it is considered that the proposal to afford village status to Old Bawn and Jobstown is not appropriate.</p> <p><b>CE Recommendation</b></p> <p>No change to the Draft Plan</p>
<p>SD-C195-205 Land Development Agency</p>	<p>The submission refers to the recently published Government's Housing for All strategy which sets out the Government's intention to bring forward planning guidelines to integrate regeneration and development into the planning process through the introduction of new Urban Development Zones. In this regard, it is submitted that that such an approach, subject to clarifying the details, could be explored to support progressing proposals for the rejuvenation of strategic areas of significance, such as the City Edge area.</p>	<p><b>CE Response</b></p> <p>The submission is noted and acknowledged.</p> <p>Having regard to the issue raised in respect the Naas Road lands and the new Urban Development Zones designation set out in the Government's Housing for All strategy or other subsequent policy documents, it is recommended that Policy QDP1 be amended to read as follows in order to cater for any future strategic land designation:</p> <p><i>Policy QDP13: Plans/Frameworks – General</i></p> <p><i>Continue to work closely with all infrastructure providers to ensure the timely delivery of social, community, economic and sustainable transportation infrastructure in tandem with new residential development and in accordance with the provisions of the County Development Plan</i></p>

		<p>or any Local Area Plan, SDZ Planning Scheme, <b>other strategic land designations</b> or framework/masterplan in place in the area.</p> <p><b>CE Recommendation</b></p> <p>Amend Policy QDP13 from:</p> <p><i>QDP13: Plans/Frameworks – General</i></p> <p><i>Continue to work closely with all infrastructure providers to ensure the timely delivery of social, community, economic and sustainable transportation infrastructure in tandem with new residential development and in accordance with the provisions of the County Development Plan or any Local Area Plan, SDZ Planning Scheme or framework/masterplan in place in the area.</i></p> <p>To:</p> <p><i>Policy QDP13: Plans/Frameworks – General</i></p> <p><i>Continue to work closely with all infrastructure providers to ensure the timely delivery of social, community, economic and sustainable transportation infrastructure in tandem with new residential development and in accordance with the provisions of the County Development Plan or any Local Area Plan, SDZ Planning Scheme, <b>other strategic land designations</b> or framework/masterplan in place in the area.</i></p>
<p>SD-C195-170 Dublin Cycling Campaign</p>	<p>The submission suggests under QDP14 Objective 3 - to prepare a LAP for Clondalkin and proposes adding “Cycling infrastructure plan for the village and routes to nearby villages and places of employment.”</p>	<p><b>CE Response</b></p> <p>The submission is noted.</p> <p>Under QDP14 Objective 3 [and EDE4 Objective 14], the Draft Plan sets out provisions pertaining a LAP for Clondalkin, which includes a Transport movement study. Any such Transport movement study carried out will ultimately inform the localised planning framework for the area, including provision for active travel. Therefore, the inclusion of a Cycling Infrastructure Plan is considered premature pending the findings and recommendations of a Transport movement study of the area. Therefore, no change is recommended to QDP14 Objective 3 [and EDE4 Objective 14].</p> <p><b>CE Recommendation</b></p> <p>No change to the Draft Plan.</p>

<p>SD-C195-170 Dublin Cycling Campaign</p>	<p>The submission relates to Policy QDP14: Local Area Plans (LAP) and suggests to extend this objective: “QDP14 SLO 2: To prepare a new Local Area Plan for Ballyboden” that includes a high-quality cycling network that will connect the new high density developments to local village centres and along commuting routes to Tallaght, Sandyford and Dublin City Centre.</p>	<p><b>CE Response</b></p> <p>The submission is noted and considered.</p> <p>Local Area Plans are carried out in accordance with Section 18 of the Planning and Development Act 2000 (as amended) and the Local Area Plans Guidelines for Planning Authorities (2013). These guidelines stipulate under Section 3.1 Key Phases the two key phases in the process of making a local area plan:</p> <ul style="list-style-type: none"> <li>• A non-statutory background data gathering process, where data and information (evidence) essential to preparing the local area plan is assembled including information on population, employment, economic development, physical and social infrastructure, heritage, flood risk assessment etc.; and</li> <li>• The statutory process – as set out in the legislation with its various elements of statutory notices, issues papers, draft, amended draft and final documents.</li> </ul> <p>The findings and recommendations from these key phases will ultimately inform the localised planning framework for the area. Therefore, the inclusion of a “high-quality cycling network that will connect the new high density developments to local village centres and along commuting routes to Tallaght, Sandyford and Dublin City Centre” under QDP14 SLO 2 as requested is considered premature at this time and should be explored during the Local Area Plan preparation process.</p> <p><b>CE Recommendation</b></p> <p>No change to the Draft Plan.</p>
<p>SD-C195-170 Dublin Cycling Campaign</p>	<p>The submission relates to Policy QDP15: Strategic Development Zones (SDZS) and suggests the following objectives:</p> <ul style="list-style-type: none"> <li>• To improve the cycling infrastructure within Adamstown including the addition of segregated cycle tracks.</li> </ul>	<p><b>CE Response</b></p> <p>The submission is noted and acknowledged.</p> <p>The Adamstown SDZ Planning Scheme forms the statutory planning framework for this area. The Planning Scheme in place contains a detailed and comprehensive movement strategy.</p> <p>As set out in the Planning Scheme “The Adamstown SDZ Planning Scheme forms part of any County Development Plan in force in the area of the Scheme until the Scheme is revoked, and any contrary provisions of the Development Plan shall be superseded by the Planning Scheme.”</p>

		<p>Therefore, the inclusion of provisions in the Draft Plan “to improve the cycling infrastructure within Adamstown including the addition of segregated cycle tracks” as requested would be unenforceable as it would be superseded by the Planning Scheme provisions.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
SD-C195-133 CAIRN Plc	The submission indicates that Cairn as the largest landowner in the Clonburris SDZ acknowledge and welcome the support from the Council in progressing the Common Infrastructure which will underpin the sustainable development of Clonburris over the next 10 years, in particular Policy QDP15 and QDP15 Objective 1.	<p><b>CE Response</b> The submission is noted and acknowledged.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
SD-C195-133 CAIRN Plc	The submission notes that Policy QDP14 seeks to prepare Local Area Plans and highlights that Newcastle has an existing LAP (extended to 2022). It is requested that a new Newcastle LAP is prepared.	<p><b>CE Response</b> The content of the submission is noted. There is an existing Local Area Plan for Newcastle which is due to expire in 2022.</p> <p>The Draft Plan includes a specific policy and set of objectives pertaining to future growth and development in Newcastle which is set out under Section</p> <p>2.7.2 Self-Sustaining Growth Towns / Self-Sustaining Town as follows:</p> <p>Policy CS9 is to support the sustainable long-term growth of Newcastle by focusing development growth within the current settlement boundary and based on the ability of local services to cater for sustainable growth levels.</p> <p>CS9 Objective 1 is to ensure that development proposals provide for infrastructure including community buildings, sports pitches and service provision in line with population growth as set out in the Newcastle LAP (2012 extended to December 2022) or any succeeding plan.</p> <p>CS9 Objective 2 is to support well designed infill and brownfield development on zoned lands along the main street, in particular where it provides for improved services, commercial, retail or mixed use provision to meet the needs of the growing population.</p>

		<p>CS9 Objective 3 is to proactively support and promote the highest appropriate levels of services, social infrastructure, facilities, retail, open space amenity and economic activity to meet the needs of current and future growth in line with the scale and function of Newcastle within the settlement hierarchy.</p> <p>Furthermore, there is a Specific Local Objective (SLO) under COS5 SLO 1 to identify and set aside land, ensuring the delivery of the quantum of OS within the general area of the Burgage South Neighbourhood Park as identified in the Newcastle Local Area Plan (2012), and to pursue all means of achieving this including proactive engagement with stakeholders and through the consideration of planning applications affecting this area.</p> <p>In addition, the Draft Plan also contains a range of policies and objectives to support the development of successful and sustainable neighbourhoods throughout the County that are connected to and provide for a range of local services and facilities,</p> <p>In respect to a new LAP for Newcastle, as per Policy QDP14 of the Draft Plan, priority will be given to the preparation of Local Area Plans for areas that are likely to experience large scale development or that are in need of regeneration and where new development requires a coordinated approach.</p> <p>The lands remain zoned RES-N which provides for the preparation of an approved plan should that be considered necessary following the expiry of the current LAP.</p> <p>Note also the sequential development provisions in relation to lands in Newcastle set out separately under the response to the OPR submission.</p> <p><b>CE Recommendation</b></p> <p>No change to the Draft Plan.</p>
<p><a href="#">SD-C195-279</a> <a href="#">Ballyboden Tidy Towns Group</a></p>	<p>The submission requests the reinstatement of the Ballyboden Village Plan as part of the County Development Plan or that an updated Village Plan be prepared and an objective for same included in the Draft Plan, acknowledging the need for community services</p>	<p><b>CE Response</b></p> <p>The submission is noted and considered.</p> <p>The Draft Plan includes provisions under QDP14 SLO 2 To prepare a new Local Area Plan for Ballyboden.</p>

	<p>such as post office, leisure, sport and recreation facilities, entertainment, youth centre and increased library services.</p>	<p>Local Area Plans are carried out in accordance with Section 18 of the Planning and Development Act 2000 (as amended) and the Local Area Plans Guidelines for Planning Authorities (2013). These guidelines stipulate under Section 3.1 Key Phases the two key phases in the process of making a local area plan:</p> <ul style="list-style-type: none"> <li>• A non-statutory background data gathering process, where data and information (evidence) essential to preparing the local area plan is assembled including information on population, employment, economic development, physical and social infrastructure, heritage, flood risk assessment etc.; and</li> <li>• The statutory process – as set out in the legislation with its various elements of statutory notices, issues papers, draft, amended draft and final documents.</li> </ul> <p>The findings and recommendations from these key phases will ultimately highlight issues around social and community infrastructure – such as such as post office, leisure, sport and recreation facilities, entertainment, youth centre and increased library services – and inform the localised planning framework for the area. Therefore, the inclusion of an objective in the Draft Plan, acknowledging the need for specific community services as requested is considered premature at this time and should be explored during the Local Area Plan preparation process.</p> <p><b>CE Recommendation</b></p> <p>No change to the Draft Plan.</p>
<p>SD-C195-279 Ballyboden Tidy Towns Group SD-C195-145 Moyville residents Association</p>	<p>The submissions request an SLO for Taylors Lane to protect and enhance Ballyboden Village to read as follows: “The height and the massing of development on Taylors Lane should respect the established pattern of development in the area, where two storey semi-detached dwellings predominate”.</p>	<p><b>[Response</b></p> <p>The submission is noted and acknowledged.</p> <p>The Draft Plan recognises that in order to secure compact and sustainable urban growth in South Dublin County, the spatial approach to the Development Plan must be to make the most efficient use of land and existing infrastructure by focusing development on urban infill and brownfield lands thereby reducing urban sprawl. This means focusing on reusing previously developed ‘brownfield’ land such as the subject lands, as well as undeveloped infill sites, particularly those served by good public transport.</p>

		<p>To support this overarching aim and guide development, the South Dublin County Building Height and Density Guide (Appendix 10) sets out the key considerations in relevant varying site contexts across the County together with performance-based assessment criteria which will enable proper consideration of development proposals for increased building height linked to the achievement of a greater density of development. All medium to large scale and complex planning applications (30 + residential units, commercial development over 1,000 sq.m. or as otherwise required by the Planning Authority) are required to be accompanied by a 'Design Statement' that include, inter alia, a detailed analysis of the proposal and statement based on the guidance, principles and performance-based design criteria set out in the South Dublin County's Height and Density Guide.</p> <p>Under 'The Plan Approach' Compliance Report and Design Statement requirements, as set out under Section 13 4.2 of the Draft Plan, all planning applications for development must also demonstrate how the proposal constitutes a positive urban design response to the local context and how it contributes to placemaking and the identity of an area.</p> <p>It should be noted that the Draft Plan and accompanying BHDG are aligned with Section 28 Ministerial Guidelines and Specific Planning Policy Requirements which prohibit blanket numerical limitations on building height.</p> <p>Therefore, it is considered that the range of policies, objectives, guidance and development management requirements set out in the Plan provide an appropriate policy framework and tool kit for assessing planning applications County wide, particularly those where increased heights may be proposed.</p> <p><b>CE Recommendation</b></p> <p>No change to the Draft Plan.</p>
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Policy Context		
Submission No.	Submission Summary	CE response and recommendation
SD-C195-222 Tallaght Community Council	<p>The submission makes for the following points:</p> <ul style="list-style-type: none"> <li>- Residential over retail (mixed use) has not yielded vibrancy in Tallaght Cross, Priorsgate or New Bancroft. High level of change of Use to residential use.</li> <li>- Request an SLO, to produce a community led Village Design Statement for Tallaght, and if councillors wish other villages, that is in line with the Lucan Village Design Statement of c 2006.</li> <li>- Request an SLO for a “Cookstown Village” enclave akin to that in Citywest Village - to allow the development of family homes (to buy) for key workers in the TTCLAP area.</li> </ul>	<p><b>CE Response</b></p> <p>The submission is noted and acknowledged.</p> <p>The adopted Tallaght Town Centre Local Area Plan 2020, prepared under Section 18 of the Planning and Development Act 2000 (as amended) contains localised planning frameworks for each of the eight identified neighbourhoods located within the Tallaght Town Centre LAP boundary including Cookstown (Section 3.3 of the LAP) and The Village (Section 3.4 of the LAP) which will guide future development in these areas. Therefore, it is considered that the proposed SLOs should not be included in the Draft Plan as this would conflict with the provisions of the adopted Local Area Plan.</p> <p>In addition, with respect to the issue raised in the submission regarding mixed-use schemes at urban centre locations, it should be noted that the Draft Plan also contains a range of policies and objectives to support the development of successful and sustainable neighbourhoods throughout the County that are connected to and provide for a range of local services and facilities.</p> <p>Under Policy QDP2: Overarching - Successful and Sustainable Neighbourhoods, QDP2 Objective 1 and QDP2 Objective 2, all new development will be required to implement ‘The plan approach’. This approach aims to ensure that all development is designed and developed around eight key principles with the aim of ensuring every opportunity is harnessed to drive and support the vision for South Dublin County to create attractive, connected and functional places to live, work, visit, socialise and invest in. Applications for new development must be accompanied by a statement detailing how ‘the plan approach’ has been taken into consideration and incorporated into the design of the development, including the materials and finishes proposed, and demonstrating how the eight overarching principles for the achievement of successful and sustainable neighbourhoods have been addressed which are:</p>

		<ul style="list-style-type: none"> <li>• The Context of an area (Character/Infrastructure – GI/Natural/Physical)</li> <li>• Healthy Placemaking</li> <li>• Connected Neighbourhoods</li> <li>• Public Realm</li> <li>• The Delivery of High-Quality and Inclusive development</li> <li>• Appropriate Density and Building Heights</li> <li>• Mix of dwelling types</li> <li>• Materials, Colours and Textures.</li> </ul> <p>The Draft Plan recognises that in order to secure compact and sustainable urban growth in South Dublin County, the spatial approach to the Development Plan must be to make the most efficient use of land and existing infrastructure by focusing development on urban infill and brownfield lands thereby reducing urban sprawl. This means focusing on reusing previously developed 'brownfield' land such as the subject lands, as well as undeveloped infill sites, particularly those served by good public transport.</p> <p>To support this overarching aim and guide development, the South Dublin County Building Height and Density Guide (Appendix 10) sets out the key considerations in scenarios for relevant varying site contexts across the County together with performance-based assessment criteria which will enable proper consideration of development proposals for increased building height linked to the achievement of a greater density of development. All medium to large scale and complex planning applications (30 + residential units, commercial development over 1,000 sq.m. or as otherwise required by the Planning Authority) are required to be accompanied by a 'Design Statement' that include, inter alia, a detailed analysis of the proposal and statement based on the guidance, principles and performance-based design criteria set out in the South Dublin County's Height and Density Guide.</p> <p>Under 'The Plan Approach' Compliance Report and Design Statement requirements, as set out under Section 13 4.2 of the Draft Plan, all planning applications for development must also demonstrate how the</p>
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		<p>proposal constitutes a positive urban design response to the local context and how it contributes to placemaking and the identity of an area.</p> <p>The recently adopted Tallaght Town Centre LAP (TTCLAP) considers in detail the neighbourhood areas outlined in the submission, namely Tallaght Village (The Village) and Cookstown. In respect to providing family homes, it is noted that TTCLAP contains the following policy under Section 5.2.1 Housing Mix:</p> <p><i>It is policy of the Council to ensure an appropriate housing mix is provided within the LAP lands, therefore a minimum of 30% of units within any new residential development (in the form of either apartments or houses, but excluding student accommodation schemes) shall have a minimum of 3 bedrooms (Objective RE 2).</i></p> <p>The Development Plan provides the higher level policy to ensure that projects are delivered in a sustainable and carefully considered manner.</p> <p><b>CE Recommendation</b></p> <p>No change to Draft Plan.</p>
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<b>Successful and Sustainable Neighbourhoods</b>		
<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation</b>
<a href="#">SD-C195-4 Rhenda Sheedy</a>	<p>The submission supports the Ballyboden Tidy Towns objections to the current SDCC development plans to SHD's and Whitechurch flood alleviation plans in their present forms and supports the view that such developments should be stopped until they are meaningfully reviewed with communities already living in the areas affected.</p>	<p><b>CE Response</b></p> <p>The submission is noted. The review of the County Development Plan is not the appropriate mechanism regarding past objections relating to Strategic Housing development.</p> <p>However, it should also be noted that the Strategic Housing Development (SHD) legislation is due to be replaced with the Large-Scale Residential Development (LRD) legislation which will restore decision making in respect of large-scale housing developments to local planning authorities with the possibility of subsequent appeal to An Bord Pleanála.</p> <p>With regard to the flood alleviation works along Whitechurch Stream between St. Enda's Park and its confluence to the Owendoher River at</p>

		<p>Ballyboden Road, permission was granted with conditions by An Bord Pleanala in December 2020 for this scheme.</p> <p>Subsequent to this grant of planning approval by the Board, an application for leave to apply for judicial review of the Board’s decision was made to the High Court in February 2021 by the Ballyboden Tidy Towns Group. The High Court granted the Ballyboden Tidy Towns Group leave to apply for judicial review. This judicial review of the Board’s decision to grant the planning approval is scheduled for hearing in November 2021.</p> <p>All future planning applications in this area will be assessed in regard to flooding in line national guidance having regard to the outcome of this judicial review and any relevant flood risk scheme.</p> <p><b>CE Recommendation</b></p> <p>No change to the Draft Plan.</p>
<p><a href="#">SD-C195-19 Knocklyon Network</a></p>	<p>Submission calls for areas in each community to be targeted for improved tree and shrub planting, in conjunction with local interests, using a mix trees, such as native conifers, fruit and deciduous trees.</p> <p>It is considered that wildflowers and greater biodiversity be introduced in larger green areas in our parks and road perimeters should be supported and the suitable planting of neglected areas that are too small for Public Realm attention be encouraged by local communities.</p> <p>It is considered that many of the Green areas throughout the County in estates or roadsides could benefit from planned intelligent planting of trees or shrubs.</p>	<p><b>CE Response</b></p> <p>The submission is noted.</p> <p>In Section 5.2.5 of the Draft Plan one of the key principles highlighted in respect to the Public Realm is that these spaces should be Well Designed as follows: “Public spaces should be attractive, with a distinct sense of place and high-quality public realm. Good-quality local greenery such as tree and shrub planting, small urban and pocket parks, playgrounds, and urban meadows, improve the look, feel and ambience of a space.”</p> <p>In addition, there are specific policies and provisions relating to Urban and Tree Planting set out in the Draft Plan under Section 4.2.3 Climate Resilience, Policy GI5, GI5 Objective 1, GI5 Objective 3, GI5 Objective 4 and GI5 Objective.</p> <p>Therefore, it is considered that the provisions of the Draft Plan comprehensively addresses this issue.</p> <p><b>CE Recommendation</b></p> <p>No change to the Draft Plan.</p>

SD-C195-19 Knocklyon Network	The submission calls for better maintenance and control of pathways from overhanging hedges, briars, branches, through measures such as FixMy Street.	<p><b>CE Response</b></p> <p>The submission is noted and acknowledged.</p> <p>Pathway maintenance and control is an operational rather than a County Development Plan matter.</p> <p><b>CE Recommendation</b></p> <p>No change to the Draft Plan.</p>
SD-C195-19 Knocklyon Network	Knocklyon Network would be critical of planning authorities in the way their area has developed, given that the planning stage is the first stage of the development of any community, particularly the lack of infrastructural planning provided in tandem with rapid development such as along the Knocklyon Firhouse corridor.	<p><b>CE Response</b></p> <p>The submission is noted. In regard to the issue of a lack of infrastructural planning provided in tandem with rapid development such as along the Knocklyon Firhouse corridor, under Policy QDP13 of the Draft Plan the Council commits to continuing to work closely with all infrastructure providers to ensure the timely delivery of social, community, economic and sustainable transportation infrastructure in tandem with new residential development and in accordance with the provisions of the County Development Plan or any Local Area Plan, SDZ Planning Scheme or framework/ masterplan in place in the area.</p> <p>In addition, as per Section 8.4.2 of the Draft Plan, the Council is committed to the delivery of social and community infrastructure and will continue to pursue a range of funding and delivery mechanisms. These include:</p> <ul style="list-style-type: none"> <li>• Funding through the Council’s financial resources, including development levy contributions.</li> <li>• Grant funding such as the Urban Regeneration Development Fund (URDF) and</li> <li>• Local Infrastructure Housing Activation Fund (LIHAF).</li> <li>• Supporting other public agencies such as the Health Services Executive (HSE) or</li> <li>• Department of Education and Skills (DES).</li> <li>• Working in partnership with other public and private sector stakeholders, where appropriate.</li> </ul> <p>This is further underpinned by Policy COS2: Social/Community Infrastructure to “Support the planned provision of a range of universally accessible and well-connected social, community, cultural and</p>

		<p>recreational facilities, close to the communities they serve, consistent with RPO 9.14 of the RSES” and COS2 Objectives 1-9 including COS2 Objective 2 “To continue to work closely with the Health Service Executive, Department of Education and Skills and the relevant public bodies and state agencies to meet the necessary provision of primary care centres, childcare facilities, schools, community centres and public open space according to the standards set out in section 8.4.1 of this Plan.”</p> <p>In addition the Development Contribution Scheme 2021-2025 identifies a broad range of county-wide community infrastructure and open space projects for funding including community centres, parks upgrades, disability accessibility works and sports facilities, etc.</p> <p>It considered that provisions set out in the Draft Plan including those referred to above clearly set out the Local Authorities policy provisions and aims for the delivery of infrastructure alongside new development.</p> <p><b>CE Recommendation</b></p> <p>No change to the Draft Plan.</p>
<p>SD-C195-19 Knocklyon Network</p>	<p>Submission calls for Draft Plan to support and encourage the sense of identity within the Knocklyon/Firhouse community. In this regard, the Knocklyon Network would like to see the area around the Knocklyon Shopping Centre, Church, School being enhanced and improved, to give it a more central role and one of pride for our community, together with an enhanced Community Centre and the provision of more signage and public art.</p>	<p><b>CE Response</b></p> <p>The submission is noted.</p> <p>It is noted that the Church, school and shopping centre are in ownership outside the control of the planning authority.</p> <p>However, the Draft Plan sets out policy, objectives and guidance in respect to the healthy placemaking and the enhancement and improvement of public realm generally including:</p> <ul style="list-style-type: none"> <li>• Section 5.2.3 Healthy Placemaking</li> <li>• Section 5.2.5 Public Realm</li> <li>• Section 13.4.5 Healthy Placemaking and Public Realm: (At the Neighbourhood Level)</li> </ul> <p>The draft Plan also supports the objectives and implementation of the South Dublin Arts Strategy and the South Dublin Cultural and Creativity Strategy and requires larger developments to incorporate a physical art feature to improve the built environment/public realm.</p>

		<p>There is significant policy in the Plan, section 8.5, relating to Community Centres including the identification of gaps in provision, extension of existing centres and provision of new centres where required.</p> <p><b>CE Recommendation</b></p> <p>No change to the Draft Plan.</p>
<p><a href="#">SD-C195-57 David Build More Housing</a></p>	<p>The submission calls for the prioritisation of housing and the environment in the Draft Plan, namely, the mass building of mixed use apartment blocks designed on the principles of the 15 minute city and as close as possible to an A energy rating to help achieve our 2050 carbon neutrality goal.</p>	<p><b>CE Response</b></p> <p>The submission is noted. The ‘layered’ format of the Plan aims to facilitate a holistic approach to ensuring Climate Action is at the forefront of all future development within the County, with policies and objectives in each chapter crafted in a manner which contributes significantly towards addressing climate change and reducing the County’s carbon emissions in a meaningful and tangible way. These overarching climate action principles align closely with the key action areas of the South Dublin Climate Action Plan 2019-2024; namely Energy and Buildings, Transport, Flood Resilience and Resource Management.</p> <p>The policies and objectives set out in the Core Strategy and Settlement Strategy, Chapter 2 of the Draft plan provides for a compact approach to growth with the aim of facilitating the delivery of climate resilient and sustainable communities throughout the County. It is the aim of the plan to achieve an efficient use of land with a focus on key urban centres, and to achieve development densities that can support vibrant, compact, walkable places that prioritise pedestrian and cyclist movement in line with the 10/15 minute settlement concept.</p> <p>The Building Regulations, which are separate to Planning legislation, set the standards for buildings and the required energy ratings. All new buildings owned and occupied after the 31<sup>st</sup> December 2020 are required to comply with the nZEB standard. The Draft Plan includes policy in Chapter 10 Energy to support this and other energy saving measures such as district heating systems. Section 10.0 of the Draft Plan refers to the ‘Climate Action Plan 2019 - To Tackle Climate Breakdown’ which represents the Government’s all of society approach, aimed at enabling Ireland to meet its EU targets to reduce carbon emissions by 30 per cent between 2021 and 2030, and lays the foundations for achieving net zero carbon emissions by 2050. Within that context South Dublin County Council through its strategic County</p>

		<p>Development Plan seeks to exceed those targets or meet them earlier, creating reliable, robust and efficient energy systems which enable growth across all sectors, and which supports the future development of the County. In line with the LGMAs Delivering on Climate Action 2030, the Council will continue to make every effort to increase energy efficiency and unlock renewable energy potential in the County.</p> <p>Therefore, it considered that provisions set out in the Draft Plan including those referred to above comprehensively address this issue.</p> <p><b>CE Recommendation</b></p> <p>No change to the Draft Plan.</p>
<p><a href="#">SD-C195-54 Transport Infrastructure Ireland</a></p>	<p>The submission notes that Objective QDP7 Objective 7 aims to ensure that all proposals for development contribute positively to providing a coherent enclosure of streets and public spaces standards as per DMURS and brings SDCC's attention to TII's Publication 'The Treatment of Transition Zones to Towns and Villages on National Roads' which describes the requirements that shall be implemented on National Roads on the approaches to towns and villages in terms of the provision of traffic calming measures and pedestrian crossings.</p>	<p><b>CE Response</b></p> <p>The content of the submission is noted in regard to the standards set out in DMURS and the TII publication 'The Treatment of Transition Zones to Towns and Villages on National Roads' which describes the requirements that TII wish to be implemented on National Roads on the approaches to towns and villages in terms of the provision of traffic calming measures and pedestrian crossings.</p> <p>In this regard the provisions of Chapter 7 should be noted where policy SM5 seeks to "Ensure that streets and roads within the County are designed to balance the needs of all road users and promote place making, sustainable movement and road safety providing a street environment that prioritises active travel and public transport" within which SM5 Objective 1 states 'To ensure that all streets and street networks are designed to passively calm traffic through the creation of a self-regulating street environment that promotes active travel modes and public transport' and SM5 Objective 2 seeks "To design new streets and roads within urban areas in accordance with the principles, approaches and standards contained within the Design Manual for Urban Roads and Streets.</p> <p>It is considered that the objectives and policy in the Draft Plan adequately address the issue raised.</p> <p><b>CE Recommendation</b></p> <p>No change to Draft Plan.</p>



<p>SD-C195-286 Belgard Area Residents Association</p>	<p>The submission advocates that, with respect to the neighbourhood concept that features prominently in the County Development Plan and [Tallaght] Local Area Plan, such objectives should be formalised in a separate plan with streets, open spaces, pockets parks, urban square, landscaping, pedestrian walkways and cycle lanes illustrated on a sitemap. In the absence of such a plan, the submission suggests that there is a risk of further instances of random development of high-rise apartment blocks unconnected to the neighbourhood, the wider area and each other.</p> <p>The submission requests that SDCC strengthen the policy and objectives of planned neighbourhoods in concept and application by adopting and publishing a specific plan to ensure that end.</p>	<p><b>CE Response</b></p> <p>The submission is noted.</p> <p>The Draft Plan contains a range of policies, objectives and guidance and specific requirements at implementation stage to support the delivery of sustainable and successful neighbourhoods throughout the County that are connected to and provide for a range of local services and facilities.</p> <p>Under Policy QDP2: Overarching - Successful and Sustainable Neighbourhoods, QDP2 Objective 1 and QDP2 Objective 2, all new development will be required to implement 'The plan approach'. This approach aims to ensure that all development is designed and developed around eight key principles with the aim of ensuring every opportunity is harnessed to drive and support the vision for South Dublin County to create attractive, connected and functional places to live, work, visit, socialise and invest in. Applications for new development must be accompanied by a statement detailing how 'the plan approach' has been taken into consideration and incorporated into the design of the development, including the materials and finishes proposed, and demonstrating how the eight overarching principles for the achievement of successful and sustainable neighbourhoods have been addressed which are:</p> <ul style="list-style-type: none"> <li>• The Context of an area (Character/Infrastructure – GI/Natural/Physical)</li> <li>• Healthy Placemaking</li> <li>• Connected Neighbourhoods</li> <li>• Public Realm</li> <li>• The Delivery of High-Quality and Inclusive development</li> <li>• Appropriate Density and Building Heights</li> <li>• Mix of dwelling types</li> <li>• Materials, Colours and Textures.</li> </ul> <p>In addition, under the 'The Plan Approach' Compliance Report and Design Statement requirements, as set out under Section 13 4.2 of the Draft Plan, all planning applications for development must also</p>
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		<p>demonstrate how the proposal constitutes a positive urban design response to the local context and how it contributes to placemaking and the identity of an area.</p> <p>Therefore, it considered that polices, objectives and development management requirements set out in the Draft Plan relating to the creation of successful and sustainable neighbourhoods are appropriate</p> <p><b>CE Recommendation</b></p> <p>No change to the Draft Plan.</p>
<p>SD-C195-237 Caitriona McClean</p>	<p>The submission calls for widespread additions of bench seating in public areas throughout the county, in keeping with encouraging a healthy lifestyle and to enhance a sense of place and destination in the many places throughout the villages.</p>	<p><b>CE Response</b></p> <p>The submission is noted. Under QDP7 Objective 12 the Council is committed to developing a network of pedestrian footpaths and public spaces, which includes access to public toilets, accessible outdoor seating and facilities for people with disabilities and/or mobility impairments and based on the principles of universal design.</p> <p>In addition, Section 8.7.5 of the Draft Plan pertaining to the provision of Quality of Public Open Space stipulates that “Age friendly and disability friendly measures should be incorporated into the overall design and layout of public open spaces, such as the provision of appropriate information, suitable path surfaces and seating at appropriate intervals or other types of rest stops. Facilities, equipment and information materials should be accessible for all regardless of age or ability.”</p> <p>Furthermore, under COS5 Objective 8 the Council is committed to ensuring that the design of parks and public open space areas is of high quality; to provide a pleasant setting, accommodate use by people of all ages and abilities, to support life-long activity and good health and well-being by the provision of a balanced mix of active and passive recreation and access to, or view of, nature, ensuring that the design considers a number of criteria including a variety of accessible, well located and designed seating.</p> <p>Therefore, it is considered that the provisions of the Draft Plan including those referred to above, comprehensively address the request as made in the submission.</p> <p><b>CE Recommendation</b></p>

		No change to the Draft Plan.
SD-C195-154 Tallaght Community Council	The submission queries the reason for two objectives for Palmerstown village only and the reason not to extend to all 9 traditional villages	<p><b>CE Response</b></p> <p>The submission is noted. The objectives relating directly to Palmerstown village, namely QDP3 Objective 4, QDP3 Objective 5 and QDP6 Objective 5, are included in the Draft Plan on foot of Motions agreed during the Council meetings in June 2021 by the elected members.</p> <p>The Draft Plan contains a range of policies, objectives, guidance and specific requirements at implementation stage to support and encourage appropriate design of new-build elements and interventions in historic buildings and environments including Policy NCBH25: Placemaking and the Historic Built Environment and NCBH Objectives 1-6;</p> <p>In addition, under QDP3 Objective 1 the Council is committed to ensuring that new development contributes in a positive manner to the character and setting of the immediate area in which a proposed development is located taking into consideration the provisions set out in Chapters 3 and 4 of this Plan and having regard to the requirements set out in Chapter 13 <i>Implementation and Monitoring</i> in relation to design statements.</p> <p>Furthermore, the Draft Plan sets out policy, objectives and guidance in respect to the healthy placemaking and the enhancement and improvement of public realm generally including:</p> <ul style="list-style-type: none"> <li>• Section 5.2.3 Healthy Placemaking</li> <li>• Section 5.2.5 Public Realm</li> <li>• Section 13.4.5 Healthy Placemaking and Public Realm: (At the Neighbourhood Level)</li> </ul> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
SD-C195-154 Tallaght Community Council	With regards to heights, the submission suggests including “in line with current and historic buildings...” under QDP3 Objective 8.	<p><b>CE Response</b></p> <p>The submission is noted and proposes to amend QDP3 Objective 8 to include “in line with current and historic buildings”.</p> <p>QDP3 Objective 8 reads:</p>

		<p><i>To only consider buildings of a reasonable/appropriate height in our heritage villages and that this is in line with current buildings and is sympathetic to the makeup of these heritage villages.</i></p> <p>The word 'current' was meant to include all existing buildings whether contemporary or historic. It is recognised that this could be interpreted differently and it is considered that the word 'current' should be replaced with 'existing' to make clear it relates to all buildings.</p> <p><b>CE Recommendation</b></p> <p>Amend QDP3 Objective 8 from:</p> <p><i>QDP3 Objective 8</i></p> <p><i>To only consider buildings of a reasonable/appropriate height in our heritage villages and that this is in line with current buildings and is sympathetic to the makeup of these heritage villages.</i></p> <p>To:</p> <p><i>QDP3 Objective 8</i></p> <p><i>To only consider buildings of a reasonable/appropriate height in our heritage villages and that this is in line with <del>current</del> existing buildings and is sympathetic to the makeup of these heritage villages.</i></p>
<p>SD-C195-154 Tallaght Community Council</p>	<p>The submission requests that under GDP4, the following SLO be included:</p> <p>To deliver a retrofit “quality greening” of the public realm including streets, walkways and plazas in Belgard Square, Tallaght Cross, Newgate apartment developments.</p>	<p><b>CE Response</b></p> <p>The submission is noted.</p> <p>The adopted Tallaght Town Centre Local Area Plan 2020, prepared under Section 18 of the Planning and Development Act 2000 (as amended) contains localised planning frameworks for each of the eight identified neighbourhoods located within the Tallaght Town Centre LAP boundary as set out in Chapter 3 which will guide any future development in these areas at a neighbourhood level. This chapter includes Key Objectives for each neighbourhood area as well as Open Space requirements.</p> <p>In addition, the LAP includes details provision and requirements in respect under 7.2 in relation Climate Adaptation – Green Infrastructure.</p> <p>With respect to “quality greening” at a County wide level, it is considered that the provisions set out in the Draft Plan in particular Section 4.2.3</p>

		<p>Climate Resilience in respect to Urban Greening and Tree Planting, Policy G15, G15 Objective 1, G15 Objective 3, G15 Objective 4 and G15 Objective 6 comprehensively address this issue.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
SD-C195-154 Tallaght Community Council	<p>The submission requires clarity on how the 10min walking perimeter is established and wishes to include that walking speed may vary.</p>	<p><b>CE Response</b></p> <p>The submission is noted. With regard to the 10-minute walking perimeters, the Central Statistics Office in respect to their National Travel Survey (2019) set a benchmark for journeys of “Being at least 100 metres in length (approximately a one minute walk)” [Source: <a href="https://www.cso.ie/en/releasesandpublications/ep/p-nts/nationaltravelsurvey2019/backgroundnotes/">https://www.cso.ie/en/releasesandpublications/ep/p-nts/nationaltravelsurvey2019/backgroundnotes/</a>] Therefore, the 10-minute walking bands or perimeters applied in the Draft Plan are set at 1000m (1Km).</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
SD-C195-154 Tallaght Community Council	<p>Under QDP6, it is asked that 2 new objectives be added as follows:</p> <p>To proactively tackle unauthorised signage in the 9 traditional villages and all ACA areas to reduce street clutter and negative visual impacts on historic buildings.</p> <p>To co-ordinate development of private and public space in Tallaght village to leverage the opportunities to improve footpaths, cycle lanes and public green open space in the village area.</p>	<p><b>CE Response</b></p> <p>The submission is noted. The proposed new objective under QDP6 “To proactively tackle unauthorised signage in the 9 traditional villages and all ACA areas to reduce street clutter and negative visual impacts on historic buildings” is noted. Unauthorised signage is a matter for the Enforcement section rather than a County Development Plan matter.</p> <p>The proposed new objective “To co-ordinate development of private and public space in Tallaght village to leverage the opportunities to improve footpaths, cycle lanes and public green open space in the village area” is noted. As indicated above, there is a statutory Local Area Plan in place for Tallaght Town Centre which includes localised planning frameworks for its eight neighbourhoods which includes ‘The Village’ (Section 3.4 of the LAP) as well as a range of policies, objectives and provisions in relation to Access and Movement (Section 2.2 of the LAP) including pedestrian and cycle movement and Public Realm and Open Space (Section 2.7 of the LAP) for the Tallaght Town Centre LAP boundary area generally.</p>

		<p>The Draft Plan also contains a range of policies, objectives guidance and standards in relation to the promotion of walking and cycling (active travel) and open space provision. Policy QDP promotes a multi-disciplinary and co-ordinated approach to the delivery and management of the public realm within the County.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
<p>SD-C195-154 Tallaght Community Council</p>	<p>The submission requests the wording be changed under QDP6 Objective 7 to “.... Similar height and of a high quality where they border... to leverage the opportunity to improve the quality of boundary treatments.”</p>	<p><b>CE Response</b></p> <p>The submission is noted. It is requested to amend QDP6 Objective 7 to read as follows:</p> <p>QDP6 Objective 7:</p> <p>To ensure, in so far as is practical, that all boundary walls in new residential developments are of a similar height <b>and of a high quality</b> where they are bordered on either side by a public footpath or an area that has been or is due to be taken-in-charge <b>to leverage the opportunity to improve the quality of boundary treatments.”</b></p> <p>This request is noted and considered appropriate.</p> <p><b>CE Recommendation</b></p> <p>Amend QDP6 Objective 7 from:</p> <p><i>QDP6 Objective 7:</i></p> <p><i>To ensure, in so far as is practical, that all boundary walls in new residential developments are of a similar height where they are bordered on either side by a public footpath or an area that has been or is due to be taken-in-charge.</i></p> <p>To:</p> <p><i>QDP6 Objective 7:</i></p> <p><i>To ensure, in so far as is practical, that all boundary walls in new residential developments are of a similar height <b>and of a high quality</b> where they are bordered on either side by a public footpath or an area that has been or is due to be taken-in-charge <b>in order to leverage the opportunity to improve the quality of boundary treatments.</b></i></p>

<p>SD-C195-154 Tallaght Community Council</p>	<p>In respect to High Quality Design, the submission seeks amendments to the wording to specify that in the event local context is not of high quality, it should not be allowed to set a low local standard for new developments and the need for leveraging opportunities to improve the local quality.</p>	<p><b>CE Response</b></p> <p>The submission is noted.</p> <p>It is requested that under High Quality Design (under Section 5.2.6 High Quality and Inclusive Development), that the wording be amended to specify that in the event local context is not of high quality, it should not be allowed to set a low local standard for new developments and the need for leveraging opportunities to improve the local quality. Subject to amendment, this request is noted and considered appropriate.</p> <p><b>CE Recommendation</b></p> <p>Amend Text under sub-heading High Quality Design from:</p> <p><i>All proposals for new development must demonstrate how the proposal constitutes a positive urban design response to the local context and how it contributes to healthy placemaking and the identity of an area.</i></p> <p>To:</p> <p><i>All proposals for new development must demonstrate how the proposal constitutes a positive urban design response to the local context, <b>leveraging improvements to the local standards where required</b>, and how it contributes to healthy placemaking and the identity of an area.</i></p>
<p>SD-C195-154 Tallaght Community Council</p>	<p>The submission seeks an emphasis on the need to ensure that street frontages and plazas be designed in the future to enhance public realm and allow for uses of public spaces.</p>	<p><b>CE Response</b></p> <p>The submission is noted. The Draft Plan sets out policy, objectives and guidance in relation to Street Frontages under Section 5.2.6 High Quality and Inclusive Development including QDP7 Objective 2:</p> <p>To actively promote well-designed streets and public spaces that provide for active frontages and ‘live’ edges that feel safe, secure and attractive for all to use. It is considered that this matter is comprehensively addressed in the Draft Plan.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
<p>SD-C195-154 Tallaght Community Council</p>	<p>The submission welcomes clarity of the following aspects:</p> <ul style="list-style-type: none"> <li>- Landmark building do not set prevailing heights;</li> </ul>	<p><b>CE Response</b></p>

	<p>- Types of landmarks, secondary and local; Saturation points, limits of landmarks where growth is forecasted</p>	<p>The submission is noted. With regard to landmark buildings, the Draft Plan, including the South Dublin County Building Height and Density Guide (Appendix 10), provides at a County wide level the policy basis and toolkit to employ the delivery of increased building height and density, including detailed assessment criteria in relation to the development of Primary and Secondary Landmarks and Local Markers.</p> <p>The South Dublin County Building Height and Density Guide (Appendix 10) sets out the key considerations in relevant varying site contexts across the County together with performance-based assessment criteria which will enable proper consideration of development proposals for increased building height linked to the achievement of a greater density of development. All medium to large scale and complex planning applications (30 + residential units, commercial development over 1,000 sq.m. or as otherwise required by the Planning Authority) are required to be accompanied by a 'Design Statement' that include, inter alia, a detailed analysis of the proposal and statement based on the guidance, principles and performance-based design criteria set out in the South Dublin County's Height and Density Guide.</p> <p>It should be noted that the Draft Plan and accompanying BHDG are aligned with Section 28 Ministerial Guidelines and Specific Planning Policy Requirements which prohibit blanket numerical limitations on building height.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
<p>SD-C195-154 Tallaght Community Council</p>	<p>The submission requests that, with regard to QDP10 Objective 1, the wording be amended to “.... To ensure that all new developments....”.</p>	<p><b>CE Response</b></p> <p>The submission is noted. It is requested that QDP10 Objective 1 be amended to read as follows:</p> <p><i>QDP10 Objective 1:</i></p> <p><i>To ensure that <b>all</b> new residential developments provide for a wide variety of housing types, sizes and tenures in line with the South Dublin County Housing Strategy 2022-2028.</i></p> <p>This request is noted and considered appropriate.</p> <p><b>CE Recommendation</b></p>



		<p>Amended QDP10 Objective 1 from:</p> <p><i>QDP10 Objective 1:</i></p> <p><i>To ensure that new residential developments provide for a wide variety of housing types, sizes and tenures in line with the South Dublin County Housing Strategy 2022-2028.</i></p> <p>To:</p> <p><i>QDP10 Objective 1:</i></p> <p><i>To ensure that <b>all</b> new residential developments provide for a wide variety of housing types, sizes and tenures in line with the South Dublin County Housing Strategy 2022-2028.</i></p>
5-154 Tallaght Community Council	The submission, with regard to 5.4.1 Local Area Plans, a discussion is requested given the level of forecasted growth in Cookstown and a similar Design Brief is suggested for Cookstown and Airton similar to Palmerstown.	<p><b>CE Response</b></p> <p>The submission is noted. The submission requests that under 5.4.1 Local Area Plans, a Design Brief be prepared for Cookstown and Airton similar to Palmerstown (QDP16 Objective 3). The areas of Cookstown and Airton are subject to an adopted, statutory Local Area Plan which provides the localised context and framework for future development in this area in conjunction with the provisions of the current Development Plan, to be superseded by the finalised Draft Plan. The LAP and the Development Plan contain sufficient objectives and policy at the local and strategic level to ensure that proposed development can be dealt with appropriately through the development management system.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
SD-C195-154 Tallaght Community Council	Under 5.3 Sustainable Rural Neighbourhoods, the submission requests that the settlement of Tallaght to be added.	<p><b>CE Response</b></p> <p>The submission is noted. It is requested that Tallaght be added under Section 5.3 Sustainable Rural Neighbourhoods. Tallaght has grown from a rural village to a strongly urban area lying within the CSO Dublin City and Suburbs settlement boundary and the MASP area under the RSES. Therefore, the designation of Tallaght as a rural settlement would be inconsistent with national and regional planning policy and with the urban nature of the settlement.</p> <p><b>CE Recommendation</b></p>

		No change to the Plan.
SD-C195-164 Denise Delappe	A submission calls for the construction of a stonewall with railings and tree planting on the Killinney Road, stretching around onto the Bohernabreena Road, along the perimeter of Allenton Estate to match that constructed on the opposite side of the road at Killinney Meadows.	<p><b>CE Response</b></p> <p>The submission is noted.</p> <p>The submission is seeking the construction of a stonewall with railings and tree planting on the Killinney Road, stretching around onto the Bohernabreena Road, along the perimeter of Allenton Estate to match that constructed on the opposite side of the road at Killinney Meadows.</p> <p>This is an operational matter and not one for the Development Plan which is a strategic landuse plan.</p> <p><b>CE Recommendation</b></p> <p>No change to the Draft Plan.</p>
SD-C195-210 Dublin Commuter Coalition	The submission highlights that housing design to be provided remains a classical developer led design and instead wishes to see SDCC increasing its ambition for the type of new sustainable housing development and follow precedents such as developments of the style of the Merwede in Utrecht - <a href="https://marckoehler.com/story/merwede-utrecht-district-of-the-future/">https://marckoehler.com/story/merwede-utrecht-district-of-the-future/</a>	<p><b>CE Response</b></p> <p>The submission and the reference to Merwede in Utrecht in the Netherlands is noted and welcomed. Merwede is a 24-hectare site that is to be developed into a green, car-free city district where 12,000 people will be able live, work and stay. The urban development plan for Merwede is divided into seventeen building blocks with a high diversity of housing types and functions per building block.</p> <p>The promotion of 10-minute settlement is a key theme throughout the Draft Plan most notably in Chapter 5 Quality Design and Healthy Placemaking and Chapter 6 Housing and Chapter 7 Sustainable Movement.</p> <p>Under Policy QDP5: Connected Neighbourhoods, the Council is committed to promoting short distance neighbourhoods and strive towards the achievement of 10-minute settlements over the lifetime of the Plan, promoting a more compact development form, sustainable movement, and ease of access to services, community facilities, jobs and amenities.</p> <p><b>CE Recommendation</b></p> <p>No change to the Draft Plan.</p>

<p>SD-C195-210 Dublin Commuter Coalition</p>	<p>The submission questions how we can move to the 15-minute-city model and wishes to see SDCC being a pioneer in this regard.</p>	<p><b>CE Response</b></p> <p>The submission is noted. The 10-minute settlement concept is supported by the RSES whereby all community facilities and services are accessible within a 10-minute walk or cycle from home or accessible via public transport services connecting people to larger scaled settlements where such services are available.</p> <p>The promotion of 10-minute settlement is a key theme through out the Draft Plan most notably in Chapter 5 Quality Design and Healthy Placemaking and Chapter 6 Housing and Chapter 7 Sustainable Movement.</p> <p>In addition, Chapter 12 The Neighbourhoods and maps provided therein indicate 10-minute walking bands and 10-minute cycle bands around all zoned Town/Village/District/Local Centres in the County.</p> <p>Under Policy QDP5: Connected Neighbourhoods, the Council is committed to promoting short distance neighbourhoods and strives towards the achievement of 10-minute settlements over the lifetime of the Plan, promoting a more compact development form, sustainable movement, and ease of access to services, community facilities, jobs and amenities.</p> <p>In Section 7.5 of the Draft Plan it states:</p> <p>“To make active travel a credible alternative choice to car-based transport, and to facilitate the 10-minute neighbourhood, certain critical factors need to be in place:</p> <ul style="list-style-type: none"> <li>• A permeable pedestrian and cycling network that allows for multiple direct connections between key destinations such as residential areas, shops, schools, employment centres and public transport links; and</li> <li>• An attractive and safe pedestrian and cycling environment where high quality facilities are provided supporting their use by all ages and abilities.</li> </ul> <p>To achieve these objectives, the Council is actively engaged in initiatives which will have a direct positive impact on walking and cycling:</p>
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		<ul style="list-style-type: none"> <li>• Cycle South Dublin – This is a programme of works to provide a safe cycle network within the County over the next decade;</li> <li>• Sustainable Movement Studies – These studies, carried out as part of the preparation of the Development Plan, involved close examination of movement within neighbourhoods with a view to identifying projects that will encourage active travel and the use of public transport;</li> <li>• Greenway projects including the extension of the Grand Canal Greenway and the continuing rollout of the Dodder Greenway. A target mode share of 15% for walking and 10% for cycling has been set by the Council increasing the mode share from 13% and 5% respectively.</li> </ul> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
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<p>SD-C195-210 Dublin Commuter Coalition</p>	<p>The submission suggests that the Plan provides for neighbourhoods that are more child-friendly, where they can safely play in streets, parks, etc.</p>	<p><b>CE Response</b></p> <p>The submission is noted.</p> <p>The Draft Plan contains a range of policies and objectives to promote well-designed streets and public spaces that feel safe, secure and attractive for all to use.</p> <p>In respect to designing streets for all users, under Section 7.8 Road and Street Design the Draft Plan states:</p> <p>“There is a growing appreciation that the design of streets has a major influence on quality of life. Streets should not just be corridors for traffic, but rather should be places in which people want to live and spend time. Streets must also facilitate more sustainable forms of travel such as walking, cycling and public transport so the need for car-borne trips is minimised. This also has other positive impacts such as reducing greenhouse gas emissions and promoting more active and healthy lifestyles.</p> <p>The design of roads and streets, safety and the management of speed are intrinsically linked. Research indicates that the speed at which people drive is primarily influenced by the design of the street or road, with regulatory features (such as speed limits) having a secondary role. A broad range of placemaking measures, such as high-quality built form, hard and soft landscaping and incorporating high levels of pedestrian and cyclist activity, as well as more conventional road design measures, need to be considered at design stage to reduce speed and make streets living places where social and economic activity can thrive.”</p> <p>Under Policy SM5: Street and Road Design, the Draft Plan commits to ensuring that streets and roads within the County are designed to balance the needs of all road users and promote place making, sustainable movement and road safety providing a street environment that prioritises active travel and public transport.</p> <p>Under SM5 Objective 1, the Draft Plan commits to ensuring that all streets and street networks are designed to passively calm traffic through the creation of a self-regulating street environment that promotes active travel modes and public transport.</p>
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		<p>In respect to open space provision at a County-wide level, under COS5 Objective 1, the Draft Plan support a hierarchy of multi-functional, accessible parks and public open spaces across the County in line with Table 8.1, based on existing populations and planned growth in accordance with the overall standard of 2.4ha per 1,000 population.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
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<p>SD-C195-213 An Taisce</p>	<p>The An Taisce submission notes that building frontages should provide appropriate enclosure to streets. They should have consistent heights relative to existing buildings and their plan form should prioritise the provision of a consistent building line, giving enclosure to the street or space. Taller buildings on the south side of east-west streets should be avoided. The Plan should promote streets and public spaces that are human-scaled and are memorable by virtue of the high standard of amenity. The height of buildings relative to the width of the space between are important issues affecting sun lighting the sense of being in a traditional street.</p> <p>For large developments (e.g. occupying more than 20m of street frontage) the height of buildings and how they positively relate to the scale of other buildings along the whole length and on both sides of the street must be demonstrated.</p> <p>The submission also recommends that existing buildings should always be kept in use and improved in thermal performance and accessibility rather than redeveloped (projected energy savings of a new building will never overcome the massive environmental footprint of demolition and redevelopment). This approach is also consistent with the UN Sustainable Development Goals.</p>	<p><b>CE Response</b></p> <p>The submission is noted.</p> <p>Provisions relating to Street Frontages are set out under Section 5.2.6 of the Draft Plan High Quality and Inclusive Development and includes the following:</p> <ul style="list-style-type: none"> <li>• Policy QDP7: High Quality Design – Street Frontage and QDP7 Objectives 2, 3 &amp; 4 set out thereunder.</li> <li>• Detailed guidance on Street Width and Building Height Ratios including Figure 3 illustrating Building Height to Street Width Ratio as per DMURS (2019), the mandatory design guide for all urban roads and streets within the 60km/h urban speed limit zone.</li> <li>• Policy QDP7: High Quality Design – Street Width and Height and QDP7 Objectives 5, 6 &amp; 7 set out thereunder.</li> </ul> <p>The Draft Plan also sets out provisions under 3.6.3 in relation to Embodied Energy and Life Cycle in Older and Traditional Buildings. It states:</p> <p>“The reuse or continued use of older buildings is a key component of sustainable development and energy conservation practice. The retention and careful rehabilitation of historic buildings including vernacular buildings and other structures whether in an urban or rural context, allows the materials and embedded energy of these structures to be retained and thereby contribute to a carbon footprint reduction. Demolition and replacement of such buildings where there are reuse options represents a waste of their embedded energy and such proposals will be discouraged and subject to rigorous scrutiny.</p> <p>This approach is supported in regional planning policy in the RSES RPO 7.40 which states ‘Local authorities shall include policies in statutory land use plans to promote high levels of energy conservation, energy efficiency and the use of renewable energy sources in existing buildings, including retro fitting of energy efficiency measures in the existing building stock and energy efficiency in traditional buildings.....’”</p> <p>In addition, under 13.2.8 in relation to Vernacular and Historic/Older Buildings, Estates and Streetscapes which is considered relevant to the recommendation that existing buildings should always be kept in use</p>
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		<p>and improved in thermal performance and accessibility rather than redeveloped. It states the following:</p> <ul style="list-style-type: none"> <li>• “Life Cycle Costing will be required for all planning applications relating to demolition of older buildings that are not Protected Structures in order to ascertain the true economic and embedded carbon value of the building.</li> <li>• Where demolition of older buildings and ground works is proposed in whole or in part, the application submitted should include an audit of the existing materials on site and a method statement regarding salvage, reuse or disposal.”</li> </ul> <p>Therefore, it is considered that the Draft Plan comprehensively addressed the issues as raised.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
SD-C195-99 Irish Water	<p>IW in their submission indicate that planned public realm and road projects have the potential to impact on Irish Water assets and projects and highlight the importance of early engagement with IW in relation to such projects which should be carried out in accordance with IW's Standard Details and Codes of Practice. In addition, Diversion Agreements will be required where an Irish Water asset is diverted or altered.</p>	<p><b>CE Response</b></p> <p>The submission is noted. South Dublin County Council in line with the provisions of IE2 Objective 1, are committed to working in conjunction with Irish Water to protect existing water and drainage infrastructure and to promote the ongoing upgrade and expansion of water supply and wastewater services to meet the future needs of the County and the Region. This includes the protection of existing water and drainage infrastructure in respect to public realm and road projects.</p> <p>Furthermore, as per Policy QDP6: Public Realm, the Draft Plan promotes a multi-disciplinary and co-ordinated approach to the delivery and management of the public realm within South Dublin County.</p> <p><b>CE Recommendation</b> No change to the Draft Plan.</p>
SD-C195-205 Land Development Agency	<p>The Land Development Agency in their submission welcome Policy QDP8 (High Quality Design – Building and Density Guide) which expresses the Council's commitment to adhere to the strategic national policy requirements set out in the Urban Development and Heights Guidelines (2018). It is submitted that the LDA</p>	<p><b>CE Response</b></p> <p>The points raised by the Land Development Agency are noted and welcomed.</p> <p><b>CE Recommendation</b></p>



	<p>have reviewed the criteria-based assessment for the assessment of applications for increased height and consider the context-based approach aligns with Special Planning Policy Requirement (SPPR) 3 criteria set out in Urban Development and Building Heights, Guidelines for Planning Authorities (2018) as it establishes a variety of factors (criteria) by which “the contextual appropriateness of the proposed height increases will be assessed” while avoiding numerical height limits.</p> <p>The LDA supports SDCC's emphasis on the need to achieve greater building heights, and increased density, where appropriate, particularly on lands zoned REGEN (i.e., Naas Road) and on well-serviced sites to facilitate the ongoing compact growth of the Dublin Metropolitan Area (DMA) and reduce urban sprawl, as set out in the Section 28 Ministerial Guidelines, specifically under SPPR1 and Section 3.1 of the Building Heights Guidelines (2018).</p> <p>There are key areas within SDCC's administrative area that lie within the DMA and/or the Dublin city and suburbs settlement boundary, particularly the Clonburris SDZ and the Naas Road/Ballymount areas, respectively. As well-located and highly accessible sites where existing public transport exists or is planned to be expanded, these sites offer a potential opportunity to support the NPF's key strategic objective of compact growth. Thus, it is considered that the contents of the Section 28 Ministerial Guidelines through the development management process are vital to unlocking underutilised sites and delivering development on urban regeneration land from a housing delivery perspective. Accordingly, the LDA in their submission endorse QDP8 Objective 2 of the Draft Development Plan.</p>	<p>No change to the Draft Plan.</p>
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<p>SD-C195-271 MCG Planning</p>	<p>The submission notes the proposed Policy QDP8 Objective 2 and submits that it is considered a sensible policy to support the development management of applications of increased height and density and that the granted development on lands outlined in the submission was subject to such a comprehensive analysis of compliance with national policy and was found to be a suitable location and size for the quantum, density and height of residential development and notes the considerations of Building Height and Density Guide (BHDG) toolkit.</p> <p>However, the submission questions the locational criteria outlined in the BHDG which is considered contrary to the national guidelines, and to Policy QDP8 of the Draft Plan. The submission states that in seeking to comply with SPPR 3 of the Building Heights Guidelines, the BHDG states that only those locations “within c. 1200m of existing Multiple Transport Nodes” within the County will be the focus for increased development densities and building heights going forward. These nodes are highlighted in the BHDG as “Tallaght, Adamstown, Clonburris, Naas Road, and to a lesser extent Fortunestown given LUAS is main transport network and existing bus service does not serve the western part of the settlement.”</p> <p>The submission highlights that Section 2.2 of the South Dublin’s Building Height Guidelines states that “outside of these areas will be generally considered less appropriate locations for significantly increased scales of development.” This distinction between “multiple transport node” locations and other locations in the county is deemed unreasonable, overly restrictive and is not in accordance with national policy.</p> <p>Section 3.2 of the Building Heights Guidelines refers to sites being “well served by public transport” also having</p>	<p><b>CE Response</b></p> <p>The submission is noted.</p> <p>The submission raises concerns regarding the locational criteria set out in the Draft Plan’s Building Height and Design Guide (BHDG) Appendix 10 to the Plan and submits that it may conflict with the Government’s Section 28 guidance and with Policy QDP8 of the Draft Plan.</p> <p>SDCC’s BHDG Sections 2.2 through 2.4 specifically address the points raised by the submission in detail. The issue of additional assessment criteria brings in the Premier Dairies judgement (High Court Judicial Review [2020] IEHC 356) which specifically links SPPR 3 (A) (1) with locational considerations and compliance with National Building Height Guidelines, Section 3.2 Development Management Criteria. The judgement expands on the locational criteria of the Apartment Design Guidelines, finding for instance that they relate to existing transport and do not include any planned future upgrade in public transport services in an area.</p> <p>In this regard, the South Dublin County BHDG states:</p> <p><i>SPPR 3 (A) (1) requires an applicant to demonstrate compliance with Section 3.2 Development Management Criteria – which indicates in terms of location that the site must be ‘well served by public transport with high capacity, frequent service and good links to other modes of public transport’. The subsequent High Court Judicial Review [2020] IEHC 356 took the opinion that this must be existing transport and does not include any planned future upgrade in public transport services in an area. As such, the locations identified by this Guide for increased development densities and building heights are focussed within c. 1200m of existing Multiple Transport Nodes within the County (including Tallaght, Adamstown, Clonburris, Naas Road, and to a lesser extent Fortunestown given LUAS is main transport network and existing bus service does not serve the western part of the settlement). Proposals outside of these areas will be generally considered less appropriate locations for significantly increased scales of development. For the purposes of relevance to the predominant forms of development expected in these locations, the Guide is focused on mid to higher density developments.</i></p>
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	<p>the potential for “good links to other modes of public transport”.</p> <p>In addition, the submission underlines that the requirement that only lands within 1,200m of multi-modal public transport nodes will be suitable for higher densities/heights is contrary to both the Urban Development and Building Heights Guidelines for Planning Authorities, 2018 and to the associated Guidelines, Sustainable Urban Housing: Design Standards for New Apartments, 2020.</p> <p>As noted in Chapter 1 of the Draft Plan, SDCC are required to have regard to and to apply these guidelines.</p> <p>The 2020 Apartment Guidelines provide further instruction in line with the “locational criteria” as stated in Policy QDP8 Objective 2. The locations are summarised as follows:</p> <ol style="list-style-type: none"> <li>1) Central and/or Accessible Urban Locations;</li> <li>2) Intermediate Urban Locations - Intermediate Urban locations are stated in the national guidance as being appropriate for higher density development and do not state that an Intermediate Urban site must be located proximate to two or more of these public transport modes;</li> <li>3) Peripheral and/or Less Accessible Urban Locations.</li> </ol> <p>In conclusion, the submission requests that the restrictive locational criteria for increased density and building height (I.e. locations within c. 1200m of existing Multiple Transport Nodes) outlined the BHDG be revised and that in line with Policy QDP8 of the Draft Plan, the locational criteria for increased density and building height, noted on pages 11, 13 and 29 of the BHDG, be revised to reflect the locational criteria for “Central and/or Accessible Urban locations” and “Intermediate Urban Locations” as outlined in the Sustainable Urban Housing: Design Standards for New Apartments, (2020).</p>	<p>As set out above, the BHDG states ‘including’ Tallaght, Adamstown, Clonburris, Naas Road, and to a lesser extent Fortunestown but does not exclude other locations in the County which are also within c. 1200m of existing Multiple Transport Nodes, nor does it exclude locations which later comply with this criterion due to investments in public transport infrastructure during the lifetime of the Plan.</p> <p>The Urban Development and Building Heights Guidelines for Planning Authorities (2018) state explicitly the following:</p> <p><i>Development Management Criteria 3.2</i></p> <p><i>In the event of making a planning application, the applicant shall demonstrate to the satisfaction of the Planning Authority/ An Bord Pleanála, that the proposed development satisfies the following criteria:</i></p> <p><i>At the scale of the relevant city/town</i></p> <ul style="list-style-type: none"> <li>• <b><i>The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.</i></b></li> </ul> <p>The Design Management Criteria is referred to in the Item (A) 1 of SPPR3 as follows:</p> <p><i>It is a specific planning policy requirement that where; (A) 1. an applicant for planning permission sets out how a development proposal complies with the criteria above [Design Management Criteria];</i></p> <p>Therefore, it is considered that the approach taken in the Draft Plan and accompanying BHDG is in line with Section 28 Ministerial Guidelines and Specific Planning Policy Requirements.</p> <p>The support for the existing RES zoning is noted along with the recognition of a road objective, cycle lanes and Bus Connection with respect to Ballyboden area.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
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	<p>The submission welcomes the retention of the Residential Zoning (Objective RES To protect and/or improve residential amenity) on the lands, on Map 11 of the Draft Plan and also acknowledges the designation of the NTA Greater Dublin Cycle Network Plan along the Ballyboden Way/Road directly adjoining the site, along with the Road Improvement Objective for Stocking Lane/Ballyboden Road and the proposal to roll out a comprehensive network of cycle lanes in the wider area.</p> <p>The submission also concurs that the delivery of BusConnects will result in significant improvements in bus services and that in tandem with the public transport and general accessibility improvements.</p>	
<p>SD-C195-170 Dublin Cycling Campaign</p>	<p>The submission suggests changing “pedestrianisation” to “segregated walking and cycle tracks connecting to villages, schools and shops, and car-free zones in QDP Objective 2: “QDP5 Objective 2: To promote measures to improve pedestrian and cycle safety and convenience, including new or enhanced permeability links within all areas and pedestrianisation within identified centres</p>	<p><b>CE Response</b></p> <p>The submission seeks the replacement of “pedestrianisation” with “segregated walking and cycle tracks connecting to villages, schools and shops, and car-free zones”. The Draft Plan contains policy and a number of objectives relating to safe cycling and walking routes and on the prioritisation of active travel modes which would support segregated cycle tracks where feasible. The Plan also contains policy on decarbonizing zones in Chapter 10, Energy. It is considered that there is sufficient policy contained in the draft plan to address the issues raised and that detailed design issues should be explored at project development stage. Therefore, no change to the plan is recommended.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
<p>SD-C195-170 Dublin Cycling Campaign</p>	<p>The submission suggests changing “sustainable transport” to “cycling and walking infrastructure” in QDP5 Objective 1 “QDP5 Objective 1: To improve the accessibility of all identified centres (see Chapter 9 table 9.2) from the surrounding catchment area through public transport provision, sustainable transport infrastructure, incorporating high quality local linkages between public</p>	<p><b>CE Response</b></p> <p>The submission is noted and acknowledged.</p> <p>The submission seeks the replacement of “sustainable transport” to “cycling and walking infrastructure” in QDP5 Objective 1. However, the reference to sustainable transport infrastructure is wider than walking and cycling. It is considered that the objective could be amended with slight rewording.</p>

	<p>transport stops, cycle parking and car park facilities and the various attractions within each identified centre”.</p>	<p><b>CE Recommendation</b></p> <p>Amend QDP5 Objective 1 from:</p> <p><i>QDP5 Objective 1:</i></p> <p><i>To improve the accessibility of all identified centres (see Chapter 9 table 9.2) from the surrounding catchment area through public transport provision, sustainable transport infrastructure, incorporating high quality local linkages between public transport stops, cycle parking and car park facilities and the various attractions within each identified centre (see Chapter 7 Sustainable Movement and Chapter 12 Our Neighbourhoods for further details).</i></p> <p>To:</p> <p><i>QDP5 Objective 1:</i></p> <p><i>To improve the accessibility of all identified centres (see Chapter 9 table 9.2) from the surrounding catchment area through public transport provision, sustainable transport infrastructure <b>including cycling and walking</b>, incorporating high quality local linkages between public transport stops, cycle parking and car park facilities and the various attractions within each identified centre (see Chapter 7 Sustainable Movement and Chapter 12 Our Neighbourhoods for further details).</i></p>
<p>SD-C195-170 Dublin Cycling Campaign</p>	<p>The submission submits that there are several specific mentions of Palmerstown Village that should be extended to all villages in the County and as such, elements like the removal of unnecessary footpath poles should be extended to footpaths and cycle tracks in all villages.</p> <p>“QDP6 Objective 5: To co-ordinate the development of the private and public space in Palmerstown Village by ensuring that any project works by third parties are used as an opportunity for SDCC to improve and enhance the streetscape and that SDCC liaise with utility providers so that all unnecessary footpath poles are removed and all electrical and other overhead cables, currently a blight on</p>	<p><b>CE Response</b></p> <p>This submission is noted.</p> <p>The objectives relating directly to Palmerstown village, namely QDP3 Objective 4, QDP3 Objective 5 and QDP6 Objective 5, are included in the Draft Plan on foot of Motions agreed during the Council meetings in June 2021.</p> <p>The points raised are noted and to a large extent are dealt with under the provisions set out under QDP6 Objectives 3 and 4 which seek ‘To promote and implement environmental and public realm improvements in existing town, village, district and local centres to a high standard and finish to ensure that the design addresses environmental quality, urban design, safety including the potential for anti-social behaviour, identity, and image’, and ‘To pursue all avenues of funding to secure resources</p>

	<p>the Village landscape, are put underground at the earliest opportunity. “</p>	<p>for the enhancement, renewal and regeneration of the public realm of the County’s urban areas’ encompass such measures.</p> <p>Nonetheless, a minor rewording to QDP6 Objective 5 would provide for the wider application of the intent of the objective, as is appropriate for a county-wide plan.</p> <p><b>CE Recommendation</b></p> <p>Amend QDP6 Objective 5 from:</p> <p><i>To co-ordinate the development of the private and public space in Palmerstown Village by ensuring that any project works by third parties are used as an opportunity for SDCC to improve and enhance the streetscape and that SDCC liaise with utility providers so that all unnecessary footpath poles are removed and all electrical and other overhead cables, currently a blight on the Village landscape, are put underground at the earliest opportunity.</i></p> <p>To:</p> <p><i>To co-ordinate the development of the private and public space in Palmerstown <b>and other villages</b> by ensuring that any project works by third parties are used as an opportunity for SDCC to improve and enhance the streetscape and that SDCC liaise with utility providers so that all unnecessary footpath poles are removed and all electrical and other overhead cables, currently a blight on the Village <b>landscapes</b>, are put underground at the earliest opportunity.</i></p>
<p>SD-C195-170 Dublin Cycling Campaign</p>	<p>The submission relates to Policy QDP7: High Quality Design – Adaptability and Inclusivity, and suggests adding the following objective: To ensure that cycling infrastructure is step-free, barrier-free and spacious and is therefore accessible to everyone: two-wheeled bicycle users, as well as tricycles, tandems, trailers, specially adapted bicycles for disabled cyclists and cargo bikes.</p>	<p><b>CE Response</b></p> <p>The submission is noted and proposes to add the following objective under Policy QDP7: To ensure that cycling infrastructure is step-free, barrier-free and spacious and is therefore accessible to everyone: two-wheeled bicycle users, as well as tricycles, tandems, trailers, specially adapted bicycles for disabled cyclists and cargo bikes.</p> <p>It is considered that this is a detailed design issue which should be explored at project development stage. The provisions set out in the plan in regard to adaptability and inclusivity are considered to provide sufficient scope to facilitate such measures where deemed feasible and</p>

		<p>appropriate at a design stage. Having regard to the above no change to the plan is recommended on foot of this request.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan</p>
<p>SD-C195-120 Arts Council</p>	<p>The Arts Councils refer to the Covid-19 pandemic and how it has influenced how public spaces are viewed and used by society. It is considered that such spaces, designed, configured and equipped to a high standard, are critical to public enjoyment and re-engagement with cultural events and live entertainment.</p> <p>The Arts Council submit that the provision of Arts and culture can contribute toward community and societal development in a number of ways including for example;</p> <ul style="list-style-type: none"> <li>• Place-making and psychological well-being: Arts and cultural assets including venues and the public realm (formal and informal public accessible spaces and buildings), can contribute toward place making by creating places where people want to go, interact, and to live near offering distinctive sense of place and personal satisfaction.</li> <li>• Creation of Stronger Communities: Arts and culture infrastructure can contribute toward social capital by facilitating the space and locations in which communities can mix, integrate and bond, and can enable informal social engagement.</li> <li>• Physical and Economic Value: High-quality and engaging spaces and arts and culture activities can assist in area renewal/regeneration and attract visitor to boost economic activity and prosperity.</li> </ul> <p>The submission refers to the 'Life Worth Living' (the Report of the Arts and Culture Recovery Taskforce<sup>1</sup>) November 2020, namely Recommendation 9 which</p>	<p><b>CE Response</b></p> <p>The submission is noted and acknowledged.</p> <p>Chapter 5 of the Draft Plan sets out detailed and extensive provisions in relation to the promotion of Quality Design and Healthy Placemaking in all new development.</p> <p>Policy QDP2: Overarching - Successful and Sustainable Neighbourhoods, QDP2 Objective 1 and QDP2 Objective 2, all new development will be required to implement 'The plan approach'. This approach aims to ensure that all development is designed and developed around eight key principles with the aim of ensuring every opportunity is harnessed to drive and support the vision for South Dublin County to create attractive, connected and functional places to live, work, visit, socialise and invest in. Applications for new development must be accompanied by a statement detailing how 'the plan approach' has been taken into consideration and incorporated into the design of the development, including the materials and finishes proposed, and demonstrating how the eight overarching principles for the achievement of successful and sustainable neighbourhoods have been addressed which are:</p> <ul style="list-style-type: none"> <li>• The Context of an area (Character/Infrastructure – GI/Natural/Physical)</li> <li>• Healthy Placemaking</li> <li>• Connected Neighbourhoods</li> <li>• Public Realm</li> <li>• The Delivery of High-Quality and Inclusive development</li> <li>• Appropriate Density and Building Heights</li> <li>• Mix of dwelling types</li> <li>• Materials, Colours and Textures.</li> </ul> <p>In addition, Section 8.13 of the Draft Plan sets out objectives for Arts and Cultural Facilities including objectives to support the Per Cent for Art</p>



	<p>promotes the development of a capital improvement programme to 'Re-imagining our Public Spaces'.</p> <p>Under recommendations from the report, Local Authorities are encouraged to prioritise place making projects and encourage/incentivise private sector with large spaces/buildings in creative activation or facilitation of spaces of local or regional scale for public enjoyments.</p> <p>The Arts Council in their submission refer to Section 10 (2) of the Planning and Development Act 2000 (as amended) which set the basis for spatial planning for the arts. The submission also refers the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands region which acknowledges that the arts and culture play a role on shaping peoples identity and seeks to promote the development and protection of the arts through a number of region policy objectives such as RPO 9.24 and RPO 9.25.</p>	<p>Scheme and to require certain sized developments to include a physical artistic feature. The section states:</p> <p><i>Public art enriches the character of the built environment and public realm in a creative and innovative way. It also contributes to the distinctiveness of an area and promotes a sense of identity that can help with the integration of diverse communities in both existing and new neighbourhoods. The Council will encourage and support proposals for the creation and installation of public art in suitable and accessible public places. Large developments will be required to provide a piece of public art or sculpture or architectural feature designed in consultation with the Council.</i></p> <p><b>CE Recommendation</b></p> <p>No change to the Draft Plan.</p>
SD-C195-133 CAIRN Plc	<p>In respect to the delivery of Sustainable Neighbourhoods and 'The Plan Approach', the submission requests that QDP2 Objective 1, QDP2 Objective 2 and QDP7 Objective 1 be amended to read as follows:</p> <p>QDP2 Objective 1 – To ensure that applications for new development are accompanied by a statement from a suitably qualified person detailing how 'The Plan Approach' has been taken into consideration and incorporated into the design of the development including the materials and finishes proposed and demonstrating how the overarching principles for the achievement of successful and sustainable neighbourhoods have been integrated as part of the design proposal <u>or includes a Design Statement how a development complies with the 12 Criteria set out in the Urban Design Manual – A Best</u></p>	<p><b>CE Response</b></p> <p>This submission is noted and requests that QDP2 Objective 1 be amended to allow for the submission of a 'Design Statement' <b>in lieu</b> of 'The Plan Approach' compliance report requirement.</p> <p>As per Section 5.2.1 of the Draft Plan, 'The Plan Approach' to the delivery of sustainable and successful neighbourhoods is to ensure that all development is designed and developed around the eight principles so that every opportunity is harnessed to drive and support the vision for South Dublin County to create attractive, connected and functional places to live, work, visit, socialise and invest in.</p> <p>The eight overarching considerations/principles are derived from and informed by policies and provisions throughout the Draft Plan in order to provide a holistic approach for development facilitated by each of the chapters.</p>



	<p><u>Practice Guide (2009) or as may subsequently be updated.</u></p> <p>QDP2 Objective 2 – To ensure that ‘The Plan Approach’ (or 12 Criteria set out in the <u>Urban Design Manual – A Best Practice Guide (2009) or as may subsequently be updated</u>) to development is taken into consideration by the applicant and demonstrated during any pre-application consultations (under section 247 of the Planning &amp; Development Act, 2000, as amended).</p> <p>QDP7 Objective 1 – To actively promote high quality design through <u>the 12 Criteria set out in the Urban Design Manual – A Best Practice Guide (2009) or the policies and objectives which form ‘The Plan Approach’ to creating sustainable and successful neighbourhoods and through the implementation of South Dublin County’s Building Height and Density Guide.</u></p> <p>With reference to Section 13.4.2 of the Draft Plan, it is submitted that that the submission of an additional ‘Compliance Report’ detailing how ‘the plan approach’ has been taken into consideration, is unnecessary and should be omitted as the ‘eight overarching principles’ of achieving successful and sustainable neighbourhoods is already catered for in a Design Statement.</p>	<p>The Design Statement is a separate requirement under Section 13.4.2 Design Considerations and Statements. As per Policy QDP7 Objective 1 of the Draft Plan, all medium-to-large scale and complex planning applications (30 + residential units, commercial development over 1,000 sq.m. or as otherwise required by the Planning Authority) shall require a Design Statement which is a detailed analysis of the proposal and statement based on the 12 design criteria set out in the ‘Urban Design Manual’ (2009) and reflected in the South Dublin County Council’s Building Height and Design Guide.</p> <p>The Draft Plan provisions set out under Section 13.4.2 allow for the ‘The Plan Approach’ report to be incorporated into the Design Statement in order to streamline the documentation requirements associated with an application of scale. However, ‘The Plan Approach’ requirements under Policy QDP7 and Section 13.4.2 would need to be satisfied in full along with the ‘Design Statement’ requirements.</p> <p>It is considered imperative that ‘The Plan Approach’ and the eight key principles informs a proposal at the earliest stage of the planning process such as at pre-planning consultation under Section 247 of the Planning and Development Act 2000 (as amended).</p> <p>With regard to the 12 Criteria set out in the Urban Design Manual – A Best Practice Guide (2009) and the South Dublin County’s own Building Height and Density Guide (Appendix 10), the eight principles which include ‘Appropriate Density and Building Heights’, ‘Mix of dwelling types’ and ‘Materials, Colours and Textures’ encourage and promotes discussion on these issues, have regard to the provisions in the Draft Plan relating to same, such as QDP7 Objective 1 ‘To actively promote high quality design through the policies and objectives which form ‘The Plan Approach’ to creating sustainable and successful neighbourhoods and through the implementation of South Dublin County’s Building Height and Density Guide.</p> <p>It should also be noted that in submission SD-C195-227 received from the Office of the Planning Regulator it states:</p> <p>“2.3 Standards and Guidelines</p> <p>The Office welcomes the ‘Plan Approach’ for the delivery of sustainable neighbourhoods which is based on ensuring that all development on</p>
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		<p>zoned land is designed and developed around eight key principles. It is noted that applications for new development will be required to be accompanied by a statement detailing how the 'Plan Approach' has been taken into consideration and incorporated into the design of the development.”</p> <p>Where large scale planning applications are accompanied by a Design Statement outlining how a development complies with the 12 Criteria set out in the Urban Design Manual – A Best Practice Guide (2009) or as may subsequently be updated a reference statement outlining how 'The Plan Approach' has been achieved through the Design Statement could be used.</p> <p>Having regard to the above it is not considered that the provisions of the plan are overly onerous in regard to demonstrating compliance with 'The Plan Approach' for the County.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
<p>SD-C195-119 People Before Profit</p>	<p>The submission highlights the need to continue to protect our local villages and the heritage that surrounds them. It is considered that the SHD process, which will now be phased out, has been detrimental to our villages and has in some places destroyed the heritage of the village in the interest of profits for developers.</p>	<p><b>CE Response</b></p> <p>This submission is noted.</p> <p>The Draft Plan contains a range of policies, objectives, guidance and specific requirements at implementation stage to support and encourage appropriate design of new-build elements and interventions in historic buildings and environments including Policy NCBH25: Placemaking and the Historic Built Environment and NCBH Objectives 1-6;</p> <p>In addition, under QDP3 Objective 1 the Council is committed to ensuring that new development contributes in a positive manner to the character and setting of the immediate area in which a proposed development is located taking into consideration the provisions set out in Chapters 3 and 4 of this Plan and having regard to the requirements set out in Chapter 13 <i>Implementation and Monitoring</i> in relation to design statements.</p> <p>This is also supported by Policy QDP3: Neighbourhood Context and QDP3 Objectives 1-9, Policy QDP2: Overarching - Successful and Sustainable Neighbourhoods, QDP2 Objective 1, QDP2 Objective 2, and</p>

		<p>Section 13.4.2, under which applications for new development must be accompanied by a statement detailing how ‘the plan approach’ has been taken into consideration and incorporated into the design of the development, including the materials and finishes proposed, and demonstrating how the eight overarching principles for the achievement of successful and sustainable neighbourhoods have been addressed.</p> <p>It should also be noted that the Strategic Housing Development (SHD) legislation is due to be replaced with the Large-Scale Residential Development (LRD) legislation which will restore decision making in respect of large-scale housing developments to local planning authorities with the possibility of subsequent appeal to An Bord Pleanála.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
SD-C195-12 NIAL BYRNE	It is considered that the Augustinians site should be developed with land uses and public space at an appropriate scale to front Taylors Lane to allow a village focal point or 'main street' to form at the existing cluster of services at Costcutter.	<p><b>CE Response</b></p> <p>This submission is noted. Permission was granted under SHD3ABP-307222-20 for demolition of existing former institutional buildings and associated outbuildings and construction of circa 496 residential units at 3.5 Ha site at Taylors Lane and Edmondstown Road, Taylors Lane, Ballyboden, Dublin 16.</p> <p>Discussions around existing permissions or individual planning applications which have gone through a separate planning process are not a matter for this report or for the Draft Plan generally.</p> <p>However, it should be noted that the Draft Plan contains a range of policies, objectives, guidance, standards and requirements which promote and support the delivery of successful and sustainable Neighbourhoods including ‘The Plan Approach’ as support by the Office of the Planning Regulator in their submission on the Draft Plan (SD-C195-227) and South Dublin County’s own Building Height and Density Guide which provides appropriate policy framework and tool kit for assessing planning applications County wide, particularly those demonstrating increased height and densities.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
SD-C195-12 NIAL BYRNE	It is considered that better integration should be encouraged between both sides of the Taylors Lane, with an enhanced public realm and improved pedestrian facilities to allow a 'main street' or village focal point to emerge at this cluster.	<p><b>CE Response</b></p> <p>This submission is noted. Permission was granted under SHD3ABP-307222-20 for demolition of existing former institutional buildings and associated outbuildings and construction of circa 496 residential units at 3.5 Ha site at Taylors Lane and Edmondstown Road, Taylors Lane, Ballyboden, Dublin 16.</p> <p>Discussions around existing permissions or individual planning applications which have gone through a separate planning process are not a matter for this report or for the Draft Plan generally.</p> <p>However, it should be noted that the Draft Plan contains a range of policies, objectives, guidance, standards and requirements which promote and support the delivery of successful and sustainable Neighbourhoods including ‘The Plan Approach’ as support by the Office of the Planning Regulator in their submission on the Draft Plan (SD-C195-227) and South Dublin County’s own Building Height and Density Guide which provides appropriate policy framework and tool kit for assessing planning applications County wide, particularly those demonstrating increased height and densities.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>

Sustainable Rural Neighbourhoods		
Submission No.	Submission Summary	CE response and recommendation
SD-C195-223 Brittas Community Association	The submission supports initiatives and objectives in the draft that relate to Brittas Village and surrounding areas noting that residents are in favour of continuing to protect the unique heritage and rural landscape of Brittas; Small scale cluster housing which would service the needs of the local community; Upgrade of water and sewage services for the local residents; Road safety and road infrastructure improvements.	<p><b>CE Response</b></p> <p>The submission is noted. The submission relates to QDP12 SLO1 of the Draft Plan which states:</p> <p><i>QDP12 SLO 1:</i></p> <p><i>To support Brittas as a sustainable community and rural village of outstanding natural beauty and to prepare a planning study and study boundary for Brittas Village, in consultation with local residents, landowners and local representatives, having regard to the implications of the proposed Natural Heritage Area designations, the future population and enhancement of the village and to development of a tourist and leisure facility to include accommodation, associated services and activities at Brittas Ponds and surrounding lands with a view to maintaining and protecting existing assets and the long-term viability of the local community. The planning and tourism study shall be commenced within 12 months of the adoption of this County Development Plan and shall include an analysis of population and housing data.</i></p> <p>As per QDP12 SLO1, the Council is committed to preparing a planning study for Brittas which will support Brittas as a sustainable community and rural village of outstanding natural beauty and examine the issues outlined as of interest to the local community.</p> <p><b>CE Recommendation</b></p> <p>No change to the Draft Plan.</p>
SD-C195-223 Brittas Community Association	The submission strongly rejects any indication given that the proposal for a commercial 'development of a tourist and leisure facility' at Brittas Ponds, as set out in Policy QDP12 SLO 1, is supported by the Brittas Community Association Committee and the Brittas community generally as this is not the case. It is submitted that the	<p><b>CE Response</b></p> <p>This submission and the particular concerns raised are noted. The Development Plan is a reserved function and issues which are the subject of debate are voted on by the Members during the special Development Plan meetings.</p>

	<p>Committee were not consulted with, or even informed of these commercial development proposals prior to this motion and they are concerned at the traction that is being gained by implying that it is supported by the local community.</p>	<p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
<p>SD-C195-195 Eamonn Prenter</p>	<p>The submission is made on behalf of the owners of the Finnstown House hotel and sets out their background and experiences in the tourism and leisure sector.</p> <p>The submission welcomes the South Dublin County Development Plan and supports the overall approach to tourism within the county. It is submitted that the emerging significant trends in tourism, including active or experience based tourism, can be facilitated at Brittas through the sensitive utilisation of the lakes as a water based amenity that will significantly add to the limited active water based tourism facilities and activities available on the River Liffey at Lucan and potential use of the reservoir at Kiltipper/Bohernabreena (subject to approval from Irish water). In addition, it is submitted that access to the dry lake would also be such a unique feature as to stimulate eco based tourism in the area to complement the activity and experienced based attractiveness of the wet lake.</p> <p>The submission includes an overview of Tourism Activity at national level including statistics on the leading activities enjoyed by domestic visitors and relevant strategies.</p> <p>The submission notes that in the Tourism Strategy for South Dublin County 2015-2020, South Dublin County is identified as possessing the natural and cultural assets to establish and sustain a substantial tourism sector. Brittas is referenced in the strategy in regard to the Slade Valley Corridor and Heritage Trail and Brittas village is seen as a key component of that proposal.</p> <p>The submission refers to the Slade Valley Corridor and Heritage Trail Feasibility Study 2014 which highlighted</p>	<p><b>CE Response</b></p> <p>This submission is noted.</p> <p>The submission suggests that QDP12 SLO 1 be amended to expand the scope of the study from a planning and tourism study to include the preparation of a planning, ecological and tourism study assessment. The submission also suggests that QP12 SLO 1 provide for identification of a sustainable development boundary for Brittas, as opposed to a study boundary.</p> <p>A planning study by its nature includes a background data gathering process, where data and information is assembled including information on population, employment, economic development, physical and social infrastructure, heritage, flood risk assessment etc.</p> <p>In addition, QDP12 SLO 1 sets out the key considerations for the planning and tourism study which are:</p> <ul style="list-style-type: none"> <li>• Implications of the proposed Natural Heritage Area designations</li> <li>• Future population and enhancement of the village</li> <li>• Development of a tourist and leisure facility to include accommodation, associated services and activities at Brittas Ponds and surrounding lands with a view to maintaining and protecting existing assets and the long-term viability of the local community</li> </ul> <p>It is considered appropriate that any other emerging issues during the study period, such as a requirement for an ecological study, be dealt with and explored at that stage.</p> <p>The submission also suggests that the following text be inserted into Section 5.3 to accompany QDP12 SLO1: <i>Brittas has recently experienced population decline but has the potential to benefit from potential linkages and complementarity to the Dublin Mountains Visitor Centre with a 'mountains to lake' experience for residents and visitors to</i></p>

	<p>the potential of the lakes in Brittas as an essential part and attractive feature and also a destination in its own right for those on the trail. The submission calls for the potential of the lakes in the context of the Slade Valley Trail be accentuated in the emerging Plan and the identification of the wider tourism attractions in the county.</p> <p>It is submitted that, with regard to the (SLO) CS6 SLO3 in the 2016-2022 CDP, work on the planning study and study boundary anticipated in adopted Specific Local Objective did not start within the 6 months following adoption of the current county plan. It is further submitted that same SLO has been presented in each of the last 4 no. adopted County Plans (2016, 2010, 2004 and 1999) without the requested study plan and boundary study ever being commenced never mind completed.</p> <p>Therefore, it is considered that a different approach should be applied in policy terms to assist development proceeding within what is a universally accepted sensitive environment. This is reflected in the suggested rewording of QDP12 SLO1 as follows:</p> <p>QDP12 SLO 1 – To support Brittas as a sustainable community and rural village of outstanding natural beauty and to prepare a planning, ecological and tourism study assessment and identification of a sustainable development boundary for Brittas Village, in consultation with local residents, landowners and local representatives, having regard to the implications of the proposed Natural Heritage Area designations, the future population and enhancement of the village and to development of a tourist and leisure facility to include accommodation, associated services and activities at Brittas Ponds and surrounding lands with a view to maintaining and protecting existing assets and the long-term viability of the local community. The planning, ecological and tourism assessment shall be commenced completed within 12 months of the adoption of this</p>	<p><i>the county. The provision of public access to the adjacent lakes has the potential to significantly enhance water leisure and tourism activities with the county having regard to sensitive design, siting and environmental safeguarding.</i></p> <p>Similarly, it is considered that the purpose of the study is to gather and analysis relevant data, having regard to the key considerations as provided for in QDP12 SLO 1 and summarised above. It is considered premature, therefore, to include the suggested additional text until the findings of the study are available.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
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	<p>County Development Plan and shall include an analysis of population and housing data.</p> <p>The submission suggests that the following text be inserted into section 5.3 accompanying QDP12 SLO1:</p> <p>'Brittas has recently experienced population decline but has the potential to benefit from potential linkages and complementarity to the Dublin Mountains Visitor Centre with a 'mountains to lake' experience for residents and visitors to the county. The provision of public access to the adjacent lakes has the potential to significantly enhance water leisure and tourism activities with the county having regard to sensitive design, siting and environmental safeguarding.'</p>	
<p>SD-C195-170 Dublin Cycling Campaign</p>	<p>The submission relates to Policy QDP12: Sustainable Rural Neighbourhoods, and suggests adding the following objectives:</p> <ul style="list-style-type: none"> <li>• To support the development of high quality greenways.</li> <li>• To support safe cycling routes for leisure cyclists</li> </ul>	<p><b>CE Response</b></p> <p>This submission is noted. In Section 9.9 Tourism and Leisure of the Draft Plan, the following policy and objectives are set out which relate to greenway and off road cycle route development.</p> <p>Policy EDE20: Greenways, Trails and Loops</p> <p>Support and facilitate the development of an integrated network of Greenways (combined off road cycle and walking routes) and Trails (walking routes) along suitable corridors, with local connections to villages and attractions and to take account of the environmental sensitivities along these corridors.</p> <p><i>EDE20 Objective 1:</i></p> <p><i>To support and facilitate the development of an integrated network of Greenways, Greenway Loops and Urban Greenways to encourage active travel across the County, subject to environmental considerations.</i></p> <p><i>EDE20 Objective 2:</i></p> <p>To support the development of local tourist and heritage trails at suitable locations including across the Dublin Mountains, and between and within Brittas-Saggart-Rathcoole; Clondalkin; Lucan; Newcastle-Lyons; Rathfarnham; and Tallaght and seek to make such trails interactive</p>

		<p>through the use of sensitive signage and the further development of mobile application software ensuring in HA DM that all such trails are sensitively landscaped and designed to ensure positive impact on biodiversity and visual amenity.</p> <p>It is considered that the above provisions in the Draft Plan adequately address the proposals put forward.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
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# Chapter 6: Housing

## Chapter 6: Housing

Housing Strategy and Interim Housing Needs Demand Assessment		
Submission No.	Submission Summary	CE response and recommendation
SD-C195-229 Glenveagh Properties	The submission raises the issue that the Draft CDP proposes an objective which requires a minimum of 30% of new units be 3-bedroom units, which conflicts with Specific Planning Policy Requirement 1 (SPPR 1) of the Sustainable Urban Housing: Design Standards for New Apartments 2018 which specifies no minimum requirement for apartments with three or more bedrooms. The submission requests that H1 Objective 13 be revised to consider an optimum housing mix rather than a rigid objective which does not reflect the flexibility outlined in the Guidelines.	<p><b>CE Response</b></p> <p>These submissions are noted and acknowledged.</p> <p>H1 Objective 13 sets out that proposals for residential development shall provide a minimum of 30% 3-bedroom units unless it can be demonstrated that:</p> <ul style="list-style-type: none"> <li>• there are unique site constraints that would prevent such provision <b>or</b></li> <li>• that the proposed housing mix meets the specific demand required in an area, having regard to the prevailing housing type within a 10-minute walk of the site and to the socio-economic, population and housing data set out in the Housing Strategy and Interim HNDA.</li> </ul> <p>The conclusion of the Housing Strategy and Interim HNDA in the Draft Plan outlines that by 2031 one, two and three person households will make up 65% of the household composition indicating that the majority of households will need one and two bed units. The remaining 35% of households will comprise 4 persons+ which will have a need for three and greater bed units. This is outlined in Section 6.8.3 of the Housing Strategy and Interim HNDA. This forecast forms the justification for the use of the figure and wording 'a minimum of 30%' used in the policy. The Draft Plan recognises the importance to provide a mix of housing type.</p> <p>In 2016, South Dublin had the highest amount of 3/4 bedroom dwellings (5-6 rooms at 47.8%) compared to the Dublin (36.9%), Region (38.7%) and State (39.9%) averages and the lowest studio-1-bed / 2 bed (1-2 rooms and 3-4 rooms) in the Dublin, Region and State averages. It is noted that the 3-4-bedroom mix figures applies to the entire County of South Dublin. While it is recognised that the figure is high by comparison to the Region, it has been observed that new development within the Regen lands at Tallaght and Naas Road and</p>
SD-C195-207 Quintain Developments Ireland Limited	<p>The submission notes that the Draft Development Plan includes H1 Objective 13 which requires residential development proposals to include a minimum of 30% 3-bedroom units. The submission points out that in context of the trend of decreasing household sizes and the nature of the existing housing stock in the county being predominantly three and four bedroom houses, this Objective is considered inappropriate. A report has been prepared by KPMG Future Analytics which accompanies the submission and provides evidence in support of removing such a unit mix requirement. The submission points out that the Design Standards for New Apartments (2020) include no such requirement for 3 bedroom units, but SPPR 1 requires that for standard apartment developments, 50% of units must be 2 bedroom units or larger. Also, it is pointed out that no more than 20-25% of apartments may be studios.</p> <p>It is submitted that Statutory Plans may specify a different dwelling mix further to an evidence-based HNDA and it is considered on that basis that the unit mix is proposed. The submission submits that on the basis of available demographic evidence, no such</p>	

<p>additional requirement for 3 bedroom units is justified. The submission refers the Planning Authority to the accompanying report prepared by KPMG Future Analytics with further details and supporting evidence on this issue. It is noted that the report provides a detailed analysis of demographic trends in the country and within South Dublin on household size and demonstrates that the proposed requirement for 30% of units to be 3-bedroom or larger would be inappropriate and counterproductive if applied to each individual application/ development.</p> <p>The submission contends that the HNDA bases its assumptions on household composition data between the years of 2006-2016. However, it is submitted that for the majority of those years, the housing market was entirely dysfunctional, with minimal completions and a population struggling with reduced income, unemployment, and sub-optimal housing conditions (increased group housing, negative equity, living at home with parents etc.) It is contended that using a more representative profile of household and population change in South Dublin (i.e. 1996-2016) provides a more realistic picture of change in the county. The submission argues that the HNDA's reliance on the 2006-2016 period belies this longer-term trend and by adjusting the trajectory of household size change from 2006-2016 to 1996-2016, it is considered possible to construct a more complete forecast for household sizes into the future, 85% of all housing stock in South Dublin remains detached/ semi-detached houses. The submission contends that South Dublin needs to rebalance the housing stock with future demands, and therefore a requirement for 30% of all units to be 3 bedroom or more is considered to be short sighted and unsupported by the evidence. Whilst maintaining a general county level target of 30% 3-bedroom homes across all housing stock may be appropriate (it is estimated above to be in excess of 49% in 2028), the submission requests that the Planning Authority removes this prescribed requirement per scheme as set out in the Development Plan. It is contended that this will ensure local flexibility to cater for unit mix need on a site-by-site basis. The requirement in this objective for 30% three-bedroom units per development also appears entirely inconsistent with the national</p>	<p>planning permissions granted have heavy concentrations of one and two bed unit types. Census 2016 indicated that the average number of children per family nationally was 1.38, unchanged from 2011. Therefore, while concentrations of one and two bed units may be appropriate statistically at a county-wide scale to offset the high concentrations of 3+ bed units, it could lead to concentrated communities where average size family formation is not provided for if left to the market. It is considered that this is not conducive to sustainable, intergenerational and diverse communities.</p> <p>Having regard to the above, the Draft Plan provides for flexibility in circumstances where a reduced level of three beds below the 30% may be appropriate. H1 Objective 13 specifically states</p> <p><i>Proposals for residential development shall provide a minimum of 30% 3-bedroom units unless it can be demonstrated that:</i></p> <ul style="list-style-type: none"> <li>→ <i>there are unique site constraints that would prevent such provision or</i></li> <li>→ <b><i>that the proposed housing mix meets the specific demand required in an area, having regard to the prevailing housing type within a 10-minute walk of the site and to the socio-economic, population and housing data set out in the Housing Strategy and Interim HNDA (emphasis added)</i></b></li> </ul> <p>Therefore, in areas where there are already high concentrations of 3+ bed units a developer will be able to demonstrate how a 30% is not required. The criteria for the area concerned is provided for in the 10-minute walk. This will ensure that the Draft Plan caters for mixed communities, in line with proper planning and sustainable development. In relation to the Section 28 Guidelines 'Sustainable Urban Housing; Design Standards for Apartments' 2020, the evidence set out in the Housing Strategy and Interim HNDA, combined with the ability in the proposed objective to examine local areas in more detail, is considered to meet the required evidence base for the provision of 3 bed units and house type mix under SPPR1. In addition, where schemes are social and affordable housing, the bedroom mix should accord with the requirements social and affordable housing waiting lists, which may seek a different mix.</p>
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	<p>policy background that is seeking the provision of one and two-bedroom units in order to meet the demands of a falling household size nationally. Therefore it is concluded that the proposed objective H1 Objective 13 to require a minimum of 30% of residential development to be 3 bedroom or more should be omitted/deleted in its entirety, in light of the submitted evidence with this submission.</p> <p>The submission is accompanied by the following report:</p> <ul style="list-style-type: none"> <li>• Engineering Assessment Report from Waterman-Moylan Consulting Engineers</li> <li>• Adamstown Brochure, prepared by Henry J Lyons Architects</li> <li>• Memo prepared by KPMG Future Analytics on Unit Mix Requirement</li> </ul>	<p>The guidelines note statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s). The Housing Strategy and Interim HNDA contained within Appendix 11 of the Development Plan carries out an evidence-based assessment for the County up to 2028. In addition, H1 Objective 12 states:</p> <p><i>To examine the need to vary the Development Plan, following the publication of the guidance on HNDA methodology issued by the Department of Housing, Local Government and Heritage in April 2021.</i></p> <p>It is therefore considered that an evidence-based approach has been put forward in the Draft Plan as well as allowing for flexibility under the specific parameters. A HNDA as set out in the Department's methodology will be carried out for the Plan following adoption. In the interim, it is considered that the interim HNDA provides a robust evidence base and that the provisions set out for 3+ bed, with local criteria to be applied as set out in the objective, are reasonable and in line with relevant section 28 guidelines.</p>
SD-C195-140 Landmarque Property Group	<p>The submission indicates they are owners of the ABB Site, Belgard Road, Tallaght, Dublin 24 and are currently preparing an application for residential development at the subject lands. The subject lands are located within the boundaries of the Tallaght Local Area Plan 2020.</p> <p>The submission refers to the Housing Needs Demands Assessment (HDNA) conclusion and how it is broad and does not account for the location, context, the mix of tenure and the overall quality of those schemes. The submission agrees that it is important to promote a mix within schemes, however it is considered that the unit mix should not be restricted on such a large scale and each proposal should be assessed on its merits.</p> <p>The submission notes that a falling household size is recognised with 2.5 persons per household as per National Planning Framework. This is anticipated to fall further into the future with current market demand for apartments firmly suggesting the need for additional 1 and 2 bedroom apartments as opposed to 3</p>	<p>Notwithstanding this, the <i>Design Standards for New Apartments' Guidelines (2020)</i> in relation to Specific Planning Policy Requirements (SPPRs) that "Accordingly, where SPPRs are stated in this document, they take precedence over any conflicting, policies and objectives of development plans, local area plans and strategic development zone planning schemes. Where such conflicts arise, such plans should be amended by the relevant planning authority to reflect the content of these guidelines and properly inform the public of the relevant SPPR requirements".</p> <p>In respect to Build-to-Rent (BTR) units, which are covered by SPPR 7 and SPPR 8 which states:</p> <p><i>For proposals that qualify as specific BTR development in accordance with SPPR 7: (i) No restrictions on dwelling mix and all other requirements of these Guidelines shall apply, unless specified otherwise;</i></p>

<p>bedroom units. The submission highlights that this is provided for in the Design Standards for New Apartments Guidelines 2020 and should be reflected in the draft Plan to ensure alignment with national policy and Section 28 guidelines.</p> <p>The submission contends the housing crisis is resulting in 'crowding' and considers that the Draft Plan as presented will exacerbate the shortfall in suitable housing and a continuation of the undesirable trend of increased household size forced upon people, arising from the significant shortfall in the provision of new housing, particularly 1 and 2 bedroom dwellings, which the National Planning Framework is seeking.</p> <p>The submission notes the Draft Plan objectives are based on the pattern of recently permitted units, not the existing profile of the County. As is evident from the HNDA the existing housing stock comprises mostly 3 + bedroom plus units at c.88.9%. This is at odds with household size profile (23.8% one and two person households-growing percentage). The submission refers to SPPR 8 of the Sustainable Urban Housing: Design Standards for New Apartments and argues that it is the intent of the guidelines to provide flexibility in relation to the specific nature of build-to-rent developments.</p> <p>The submission suggests that in order to better provide for the future anticipated population profile which is predicted to include 65% 1-3 No. person households by 2028, the amendment of H1 Objective 13 is requested in order to prevent undue restriction of proposed unit mix.</p> <p>The submission specifically requests to amend Objective 13 to exclude build-to-rent developments to align with the provisions of Specific Planning Policy Requirement 8 of the 'Design Standards for New Apartments' Guidelines 2020 in terms of Apartment Unit Mix as follows;</p> <p>'Proposals for residential development (excluding apartment developments and 'build-to-rent' developments) shall provide a</p>	<p>Therefore, having regard to this and to the provision of further clarity it is recommended that H1 Objective 13 be amended to read as follows:</p> <p><b>H1 Objective 13:</b></p> <p><i>Proposals for residential (excluding Build-to-Rent developments) shall provide a minimum of 30% 3-bedroom units, a lesser provision may be acceptable where it can be demonstrated that:</i></p> <ul style="list-style-type: none"> <li>→ <i>there are unique site constraints that would prevent such provision or</i></li> <li>→ <i>that the proposed housing mix meets the specific demand required in an area, having regard to the prevailing housing type within a 10-minute walk of the site and to the socio-economic, population and housing data set out in the Housing Strategy and Interim HNDA; or</i></li> <li>→ <b><i>the scheme is a social and/or affordable housing scheme</i></b></li> </ul> <p><b>CE Recommendation</b></p> <p>Amend H1 Objective 13 from:</p> <p><i>H1 Objective 13:</i></p> <p><i>Proposals for residential development shall provide a minimum of 30% 3-bedroom units unless it can be demonstrated that:</i></p> <ul style="list-style-type: none"> <li>→ <i>there are unique site constraints that would prevent such provision or</i></li> <li>→ <i>that the proposed housing mix meets the specific demand required in an area, having regard to the prevailing housing type within a 10-minute walk of the site and to the socio-economic, population and housing data set out in the Housing Strategy and Interim HNDA.</i> <p>To:</p> <p><b><i>Proposals for residential (excluding Build-to-Rent developments) shall provide a minimum of 30% 3-bedroom units, a lesser provision may be acceptable where it can be demonstrated that:</i></b></p> </li></ul>
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	<p>minimum of 30% 3-bedroom units unless it can be demonstrated that:</p> <ul style="list-style-type: none"> <li>- there are unique site constraints that would prevent such provision or</li> <li>- that the proposed housing mix meets the specific demand required in an area, having regard to the prevailing housing type within a 10-minute walk of the site and to the socio-economic, population and housing data set out in the Housing Strategy and Interim HNDA.'</li> </ul> <p>The submission concludes by objecting to the inclusion of the above requirements for unit mix which do not appear to be supported by the HNDA prepared by the Council, as these clearly conflict with the contents of the Design Standards for New Apartments. We request that the forthcoming Plan be revised to align with the Design Standards for New Apartments.</p>	<ul style="list-style-type: none"> <li>→ <i>there are unique site constraints that would prevent such provision or</i></li> <li>→ <i>that the proposed housing mix meets the specific demand required in an area, having regard to the prevailing housing type within a 10-minute walk of the site and to the socio-economic, population and housing data set out in the Housing Strategy and Interim HNDA; or</i></li> <li>→ <b><i>the scheme is a social and/or affordable housing scheme</i></b></li> </ul>
<p>SD-C195-133 CAIRN Plc</p>	<p>The submission seeks the removal of H1 Objective 13 of the Draft Plan as the Section 28 National Apartment Guidelines mix is recognised as the primary policy informing the delivery of new apartment schemes. Alternatively, the submission seeks to amend Objective 13 to exclude Apartments and build-to-rent developments to align with the provisions of Specific Planning Policy Requirement 8 of the 'Design Standards for New Apartments' Guidelines 2020 in terms of Apartment Unit Mix as follows;</p> <p>Proposals for residential development (<b><u>excluding apartment developments and 'build-to-rent' developments</u></b>) shall provide a minimum of 30% 3-bedroom units unless it can be demonstrated that:</p> <ul style="list-style-type: none"> <li>there are unique site constraints that would prevent such provision or</li> <li>that the proposed housing mix meets the specific demand required in an area, having regard to the prevailing housing type within a 10-minute walk of the site and to the socio-economic, population</li> </ul>	

	<p>and housing data set out in the Housing Strategy and Interim HNDA.</p> <p>In this regard, it is submitted that all statistical evidence available points to the housing crisis resulting in “crowding” within existing houses in urban areas. It is considered that the commentary in the Draft Plan as presented will exacerbate the shortfall in suitable housing and a continuation of the undesirable trend of increased household size forced upon people, arising from the significant shortfall in the provision of new housing, particularly 1 and 2 bedroom dwellings, which the National Planning Framework is seeking.</p>	
<p>SD-C195-114 John Spain Associates</p> <p>SD-C195-115 John Spain Associates</p>	<p>The submission indicates that household sizes are anticipated to fall further into the future with current market demand for apartments firmly suggesting the need for additional 1 and 2 bedroom apartments as opposed to 3 bedroom units.</p> <p>In addition, the submission highlights that it is provided for in the Design Standards for New Apartments Guidelines 2020 and requested that this be reflected in the draft Plan to ensure alignment with national policy and Section 28 guidelines and that proposed developments should be assessed on a case by case basis in the context of the surrounding area and in relation to the Design Standards for New Apartments.</p> <p>It is respectfully submitted, that the commentary in the Draft Development Plan as presented will exacerbate the shortfall in suitable housing and a continuation of the undesirable trend of increased household size forced upon people, arising from the significant shortfall in the provision of new housing, particularly 1- and 2-bedroom dwellings, which the National Planning Framework is seeking.</p>	<p><b>CE Response</b></p> <p>The issues raised in the submission are noted. The conclusion of the Housing Strategy and Interim HNDA outlines that by 2031 one, two and three person households will make up 65% of the household composition indicating that the majority of households will need one and two bed units. The remaining 35% of households will comprise 4 persons+ of which will have a need for three and greater bed units. This is outlined in Section 6.8.3 of the Housing Strategy and Interim HNDA. This forecast forms the justification for the use of the figure and wording ‘a minimum of 30%’ used in the policy. The draft Plan recognises the importance to provide a mix of housing type.</p> <p>In 2016, South Dublin had the highest amount of 3/4 bedroom dwellings (5-6 rooms at 47.8%) compared to the Dublin (36.9%), Region (38.7%) and State (39.9%) averages and the lowest studio-1-bed / 2 bed (1-2 rooms and 3-4 rooms) in the Dublin, Region and States averages. It is noted that the 3–4-bedroom mix figures apply to the entire County of South Dublin. While it is recognised that the figure is high by comparison to the Region, new development and planning permissions granted are likely to increase the smaller unit sizes with heavy concentrations of unit types within the regeneration lands and along the Luas lines.</p> <p>Notwithstanding the above, the Draft Plan provides for flexibility in circumstances where a reduced level of three beds may be appropriate. H1 Objective 13 specifically states “<i>Proposals for</i></p>

		<p><i>residential development shall provide a minimum of 30% 3-bedroom units unless it can be demonstrated that:</i></p> <ul style="list-style-type: none"> <li>• <i>there are unique site constraints that would prevent such provision or</i></li> <li>• <i>that the proposed housing mix meets the specific demand required in an area, having regard to the prevailing housing type within a 10-minute walk of the site and to the socio-economic, population and housing data set out in the Housing Strategy and Interim HNDA.”</i></li> </ul> <p>It is noted that this objective has been recommended for revision to exclude build to rent and to clarify that less than 30% can be acceptable within the criteria outlined.</p> <p>In relation to the Section 28 Guidelines ‘Sustainable Urban Housing; Design Standards for Apartments’ 2020, the evidence above is put forward to overcome restrictions on 3 bed units under SPPR1. The guidelines note statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s). The Housing Strategy and Interim HNDA contained within Appendix 11 of the Development Plan carries out an evidence-based assessment for the County up to 2028.</p> <p>It is therefore considered than an evidence-based approach has been put forward in the Draft and Plan as well as allowing for flexibility under the specific parameters.</p> <p><b>CE Recommendation</b></p> <p>No change to Draft Plan.</p>
<p><a href="#">SD-C195-222 Tallaght Community Council</a></p>	<p>The submission looks for an SLO to include neighbourhood level housing strategies be carried out and that the Draft Plan support and work jointly with relevant agencies, including the SDCYPS members, on the current and future needs of areas categorised as 'very disadvantaged' or 'disadvantaged, homeless families, children and young people.</p>	<p><b>CE Response</b></p> <p>The submission seeks an SLO that neighbourhood level housing strategies be carried out. Development Plans including Housing Strategy requirements are set out in legislation under Part II Chapter I of the Planning and Development Act 2000 (as amended). In addition, the Draft Development Plan Guidelines (2021) which will supersede</p>



	<p>The submission also looks for the retention of policy H1 Objective 6 from the current 2016 CDP which states:</p> <p><i>'To facilitate the development of emergency accommodation, including hostels for homeless individuals and families, in a balanced way located throughout the County and not concentrated in any particular area.'</i></p>	<p>the 2007 Guidelines, are prescribed under Section 28 of the Act (Ministerial Guidelines) and contain Specific Planning Policy Requirements (SPPRs) which must be adhered to. Therefore, the Draft Plan and associated Appendix 11 Housing Strategy and Interim Housing Needs Demand Assessment (HND) as prepared is in line with the legislative requirements and ministerial guidance. Similarly, any revision to the Housing Strategy to provide for the HNDA methodology will be carried out in accordance with the Guidelines.</p> <p>The submission also requests that the Draft Plan support and work jointly with relevant agencies, including the South Dublin Children and Young People's Services (SDCYPS) committee members, on the current and future needs of areas categorised as 'very disadvantaged' or 'disadvantaged, homeless families, children and young people. In this regard, the following provisions of the Draft Plan are considered to be particularly relevant:</p> <p><i>H1 Objective 4:</i></p> <p><i>To recognise the urgent need for the increased provision of social and affordable housing to ensure that all residents in South Dublin County have access to a home. Such provision shall be made through working with approved housing bodies and co-operatives to provide for social and genuinely affordable housing accommodation to meet housing needs. This shall be carried out through a range of delivery mechanisms including new builds, acquisitions, renovations and acquisitions of vacant homes, cost rental leasing, and housing supports including RAS and HAP or any other mechanism promoted under Government Housing Policy, with priority given to new builds and renovations whenever available.</i></p> <p><i>COS9 Objective 7:</i></p> <p><i>To promote the provision of youth services that support, and target disadvantaged young people and improve their employability, consistent with RPO 9.20 of the RSES, and the provision of informal education and training opportunities within the County, consistent with the LECP.</i></p>
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<p><a href="#">SD-C195-205 Land Development Agency</a></p>	<p>The submission from the Land Development Agency (LDA) welcome and supports the approach to housing provision set out in the Housing Strategy of the Draft Development Plan, in particular, the commitment of the Council to ensure the adequate quantum of zoned lands for delivering affordable housing set out under H1 Objective 1 of the Draft Development Plan, and including specific targets of residential lands to be reserved for social and affordable housing, set out under H1 Objective 2 of the Draft Development Plan.</p> <p>The LDA in their submission supports H1 Objective 14, which shows SDCC's commitment to supporting the provision of a mix of tenure for the delivery of successful and sustainable communities within the County over the lifetime of the new Plan. However, it is noted that some individual sites may have specific tenure</p>	<p><b>CE Response</b></p> <p>The submission is noted and the support for H1 Objective 1 is acknowledged.</p> <p>The Draft Plan under H1 Objective 14 sets out the Council's commitment to support the provision of a mix of tenure types across the County in creating suitable accommodation for all, promoting sustainable and mixed income communities and discouraging an over proliferation of a single tenure (whether private owner occupier, private rental, social rental or affordable purchase and rental) within any local area (within a 10-minute walking distance) or Local Electoral Area, in line with the Apartment Guidelines and the provision of the South Dublin Housing Strategy and Interim HNDA or any subsequent future Regional based HNDA. It is considered that this objective would not</p>

	<p>requirements and suggest greater clarity is given as to the specifics of this application.</p> <p>The LDA in their submission considers that there is significant potential for acknowledging the development potential of the public land within SDCC's administrative area, these lands where relevant are aligned with the core strategy should be prioritised for housing delivery in the context of the implementation of H1 Objective 1 and H1 Objective 2.</p>	<p>prejudice individual sites where particular tenures are more suitable coming forward as the context is set within a 10 minute walk or LEA.</p> <p>With regard to the development of public lands, the following provisions, as set out in Draft Plan, are considered to be particularly relevant:</p> <p><i>CS1 Objective 2:</i></p> <p><i>To support continued collaboration between infrastructure providers, state agencies and local authorities to inform cross sectoral investment plans and capital spending plans to accelerate the development of strategic development areas and secure the best use of public lands in the Dublin Metropolitan Area – consistent with RPO 5.1.</i></p> <p><i>H2 Objective 6:</i></p> <p><i>To ensure an adequate and appropriate provision of social housing across the County, particularly in relation to 1 bed and 4 bed units, through the building up of public landbanks, facilitation of the transfer of lands and other appropriate mechanisms with third parties (only where necessary) to ensure an appropriate number of and distribution of new social housing, and to avoid additional concentration of social housing above that already in existence.</i></p> <p>In addition, in Appendix 11 Housing Strategy and Interim HNDA it states:</p> <p><i>Unlike the previous Development Plan, the Council has a significant pipeline of projects on Council owned land to deliver homes over the plan period in combination with Council Stock turnover and Capital Assistance Scheme.</i></p> <p>In terms of the Draft Plan's priorities in relation to housing delivery, in accordance with the NPF and RSES planning policy, the focus is on compact growth, as set out under Section 2.7 Settlement Strategy:</p> <p>South Dublin County's Settlement Strategy is guided by the policy framework set out at National and Regional levels. It seeks the consolidation of the existing urban footprint, focusing population and jobs primarily within our urban centres, towns and villages consistent with NPO 3a, 3b and 3c of the NPF. The Development Plan recognises that there is a need to successfully respond to the ever-</p>
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		<p>changing demands, pressures and expectations for our urban fabric, prioritising the most efficient use of existing social and physical infrastructure. In doing so, promoting mixed-use compact growth will create a more resilient, healthy, and liveable environment which positively influences the quality of people's lives.</p> <p>In relation to the delivery of social and affordable housing within this overarching policy framework, the Draft Plan is committed under H1 Objective 4 to recognising the urgent need for the increased provision of social and affordable housing to ensure that all residents in South Dublin County have access to a home. Such provision shall be made through working with approved housing bodies and co-operatives to provide for social and genuinely affordable housing accommodation to meet housing needs. This shall be carried out through a range of delivery mechanisms including new builds, acquisitions, renovations and acquisitions of vacant homes, leasing, and housing supports including RAS and HAP or any other mechanism promoted under Government Housing Policy, with priority given to new builds and renovations whenever available.</p> <p><b>CE Recommendation</b></p> <p>No change to the Draft Plan</p>
<p>SD-C195-205 Land Development Agency</p>	<p>The Land Development Agency (LDA) in their submission acknowledge that whilst the Draft Development Plan, in respect of social housing provision within public lands, has introduced H2 Objective 6, it be amended to ensure that the LDA's role in site assembly and enabling the full development potential of public lands, to read as follows: To ensure an adequate and appropriate provision of social and affordable housing across the County, particularly in relation to 1 bed and 4 bed units, through the building up of public landbanks, facilitation of the transfer of lands and other appropriate mechanisms in cooperation with the LDA, and with third parties (only where necessary) to ensure an appropriate number of and distribution of new social housing, and to avoid additional concentration of social housing above that already in existence.</p>	<p><b>CE Response</b></p> <p>The submission is noted.</p> <p>H2 Objective 6 currently reads:</p> <p><i>To ensure an adequate and appropriate provision of social housing across the County, particularly in relation to 1 bed and 4 bed units, through the building up of public landbanks, facilitation of the transfer of lands and other appropriate mechanisms with third parties (only where necessary) to ensure an appropriate number of and distribution of new social housing, and to avoid additional concentration of social housing above that already in existence.</i></p> <p>It is considered that the provisions set out under H2 Objective 6, namely where it indicates that "facilitation of the transfer of lands and other appropriate mechanism with third parties (only where necessary)" appropriately provides for third parties such as the LDA.</p>

		<p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
<p>SD-C195-140 Landmarque Property Group</p>	<p>The submission indicates they are owners of the ABB Site, Belgard Road, Tallaght, Dublin 24 and are currently preparing an application for residential development at the subject lands. The subject lands are located within the boundaries of the Tallaght Local Area Plan 2020.</p> <p>The submission refers to HS1: Objective 4, H1 Objective 14 and HS1: Objective 16 and while the submission welcomes the intention of the Objectives it is contended that the aim to avoid the 'proliferation of a single tenure' is vague in its implications and relies on a subjective reading of the quantity of the particular tenure. The submission submits that the rationale for such a requirement is not clearly set out and is too vague. It is contended that by placing a significant emphasis on owner occupation, the Local Authority is not providing for those without the ability to access a mortgage or persons in smaller households, or indeed seeking smaller household (down sizing).</p> <p>The submission argues that the Housing Needs Demand Assessment (HNDA) should balance the existing stock of housing by providing a more complete range of choice. The submission notes that it is evident that national policy supports an increase in BTR developments and points out that this is explicitly supported by the apartment guidelines and is fully consistent with the NPF. The submission contends that to restrict the location of a development based on tenure would undermine national policy guidance and also result in a significant reduction in the provision of high-quality professionally managed apartments in Tallaght.</p> <p>The submission refers to Housing For All and in particular Pillar 4 for Housing and Homelessness, and notes that the rented sector is a key component of the Government's overall response to solving the housing crisis. Encouraging Build to Rent (BTR) is described as one of the 'key actions' within this Pillar.</p>	<p><b>CE Response</b></p> <p>This submission is noted and acknowledged. The submission requests the removal of H1 Objective 4 and H1 Objective 16 in order to prevent undue restriction of particular tenures, allowing decisions to be made on a case-by-case basis and in line with the Design Standards for New Apartments SPPR 7 and 8.</p> <p>HS1 Objective 4 of the Housing Strategy in the Draft Plan states:</p> <p><i>HS1 Objective 4:</i></p> <p>To support the provision of a mix of tenure types across the County in creating suitable accommodation for all and discourage undue segregation and over proliferation of a single tenure within any local area (within a 10-minute walking distance) in line with the provision of the Housing Strategy and Interim HNDA or any subsequent future Regional based HNDA.</p> <p>H1 Objective 14 of the Draft Plan states:</p> <p><i>H1 Objective 14</i></p> <p><i>Support the provision of a mix of tenure types across the County in creating suitable accommodation for all in promoting sustainable and mixed income communities and discourage an over proliferation of a single tenure (whether private owner occupier, private rental, social rental or affordable purchase and rental) within any local area (within a 10-minute walking distance) or Local Electoral Area, in line with the Apartment Guidelines and the provision of the Housing Strategy and Interim HNDA or any subsequent future Regional based HNDA.</i></p> <p>H1 Objective 16 of the Draft Plan states:</p> <p><i>H1 Objective 16:</i></p> <p><i>To ensure that a balanced mix of tenure is provided for in the areas zoned for Regeneration in the Tallaght LAP lands and the Naas Road Framework Plan area. Such a mix shall take account of the existing or permitted tenure within a ten-minute walking distance of any proposed</i></p>

	<p>The submission highlights that the provisions for Build to Rent developments were set out in the Guidelines for Planning Authorities issued under Section 28 of the Planning and Development Act, 2000 (as amended) ‘Sustainable Urban Housing: Design Standards for New Apartments’ December 2020), specifically noting that Special Planning Policy Requirement 7 and 8 set out the main guidance for BTR developments and provides a definition for the same. The submission indicates as set out in the Guidelines, where SPPRs are stated, they take precedence over any conflicting, policies and objectives of development plans, local area plans and strategic development zone planning schemes. Where such conflicts arise, such plans should be amended by the relevant planning authority to reflect the content of these guidelines and properly inform the public of the relevant SPPR requirements.</p> <p>The submission therefore considers that the draft contradicts itself as H1 Objective 14 of the Draft Plan as set out above aims to ‘To support the provision of a mix of tenure types across the County in creating suitable accommodation for all...’ and with respect to this objective the submission requests the removal of H1 Objective 4 and H1 Objective 16 in order to prevent undue restriction of particular tenures, allowing decisions to be made on a case-by-case basis and in line with the Design Standards for New Apartments SPPR 7 and 8.</p>	<p><i>development and applicants for planning permission shall demonstrate, to the satisfaction of the Planning Authority, that there is no saturation of a single tenure within the defined area.</i></p> <p>It is considered that the above objectives are consistent with recent national policy under the Housing for All Strategy 2021 and enacted legislation in the Affordable Housing Act 2021.</p> <p>It is noted that the Government, as per the Housing for All Strategy 2021, is committed to continuing the policy of having mixed tenure communities, including through the mechanism of Part V of the Planning and Development Act 2000 (as amended), to ensure that social and affordable housing are part of the mix of tenure across housing developments as follows:</p> <p><i>Executive Summary</i></p> <p><i>Ireland needs an average of 33,000 homes constructed per annum until 2030 to meet targets set out for additional households, as outlined in the National Planning Framework. These homes need to be affordable, built in the right place, to the right standard and in support of climate action. They need to satisfy demand for housing across four tenures – affordable, social, private rental and private ownership.</i></p> <p><i>5.2 Support Sustainable Communities</i></p> <p><i>In this context, the Government commits to continuing the policy of having mixed tenure communities, including through the mechanism of Part V of the Planning and Development Act 2000, to ensure that social and affordable housing are part of the mix across housing developments.</i></p> <p>It is noted that as per Figure 2 of the Housing for All Strategy 2021, the percentage breakdown across each tenure type is approximately 36% New private ownership homes; 20% New private rental homes; 13% New affordable homes; 31% New social housing homes.</p> <p>NPO 4 of the NPF states:</p>
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		<p><i>Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.</i></p> <p>Therefore, having regard to NPO 4 and the provisions of the Housing for All Strategy 2021, the avoidance through policy of an over proliferation of a single type on tenure in an area is appropriate and consistent with national policy.</p> <p>It is considered that HS1 Objective 4, H1 Objective 14 and H1 Objective 16 as set out in the Draft Plan are appropriate.</p> <p><b>CE Recommendation</b></p> <p>No change to Draft Plan.</p>
<p>SD-C195-113 CAIRN Plc</p> <p>SD-C195-133 CAIRN Plc</p>	<p>The submission respectfully requests that Appendix 11, South Dublin Housing Strategy and Interim HNDA 2022 –2028, be reviewed as it does not have regard to the Housing Needs and Demand Assessment (HNDA) Guidelines which were published on the 14th April 2021 and the housing targets within the report and succeeding Core Strategy and Settlement Strategy relate to ESRI 50:50 Scenario published by the Department in December 2020 which have been superseded by the new guidance.</p>	<p><b>CE Response</b></p> <p>The submission is noted. The Draft Plan includes a Housing Strategy and Interim HNDA contained within Appendix 11 of the Development Plan which carries out an evidence-based assessment for the County up to 2028. H1 Objective 12 of the Draft Plan seeks to examine the need to vary the Development Plan, following the publication of the guidance on HNDA methodology issued by the Department of Housing, Local Government and Heritage in April 2021. Therefore, a further review of household composition will be examined and updated if deemed necessary.</p> <p>Furthermore, its noted that Eastern and Midland Regional Assembly (EMRA) have substantiated the Housing Strategy and Interim HNDA and have stated in their submission “the ‘Housing Strategy and Interim HNDA’ provide a robust evidence-based framework to inform the housing policies in the Draft CDP including requirements for specialist provision and social and affordable housing, subject to the publication of any future revised ‘Housing Strategy’ Guidelines under Section 28 that may require further housing need and demand assessment to be taken into account”. Therefore, it is considered that the Interim HDNA carries out an evidence-based assessment for the County and there are adequate provision in plan to update if required.</p> <p><b>CE Recommendation</b></p>

		No change to the Plan.
SD-C195-114 John Spain Associates	The submission refers to Section 8.3.2 Housing Tenure of Appendix 11 Housing Strategy and Interim HNDA which states “However, a preponderance of single tenure permissions has been identified within the regeneration areas of the County, in particular in the Tallaght LAP lands but also in the Naas Road area where a Framework Plan is being prepared. It is considered appropriate, for these areas, to provide for policy which will ensure that a balanced approach is taken to residential development and tenure type to promote life-long homes to cater for all family cycles. This would facilitate more sustainable communities in these newly developing areas with the multiple benefits identified in literature (Sections 4 and 5) and outlined in section 6.8 above”. In this regard, it is submitted to be unreasonable to restrict the quantum of a single tenure of development such as BTR schemes in an area such as Tallaght town centre, which is adjacent to the red line Luas and numerous high-frequency bus corridors in addition to employment opportunities and services. By placing a significant emphasis on owner occupation, the Local Authority is not providing for those without the ability to access a mortgage or persons in smaller households, or indeed seeking smaller household (down-sizing). This type of development is synonymous with large centres like Tallaght in comparable locations internationally. The submission suggests that it is evident from national policy guidance that build-to-rent tenure types are supported through national policy and considers it unreasonable to unnecessarily restrict such proposals which will deliver much needed housing.	<b>CE Response</b>
SD-C195-115 John Spain Associates		<p>This submission is noted. The submission raises concerns regarding provisions set out in Appendix 11 Housing Strategy and Interim HNDA, namely that is unreasonable to restrict the quantum of a single tenure of development such as BTR schemes in an area such as Tallaght town centre, which is adjacent to the red line Luas and numerous high-frequency bus corridors in addition to employment opportunities and services, particularly as build-to-rent tenure types are supported through national policy.</p> <p>HS1 Objective 4 of the Housing Strategy in the Draft Plan states: <i>HS1 Objective 4:</i> <i>To support the provision of a mix of tenure types across the County in creating suitable accommodation for all and discourage undue segregation and over proliferation of a single tenure within any local area (within a 10-minute walking distance) in line with the provision of the Housing Strategy and Interim HNDA or any subsequent future Regional based HNDA.</i></p> <p>H1 Objective 14 of the Draft Plan states: <i>H1 Objective 14</i> <i>Support the provision of a mix of tenure types across the County in creating suitable accommodation for all in promoting sustainable and mixed income communities and discourage an over proliferation of a single tenure (whether private owner occupier, private rental, social rental or affordable purchase and rental) within any local area (within a 10-minute walking distance) or Local Electoral Area, in line with the Apartment Guidelines and the provision of the Housing Strategy and Interim HNDA or any subsequent future Regional based HNDA.</i></p> <p>H1 Objective 16 of the Draft Plan states: <i>H1 Objective 16:</i> <i>To ensure that a balanced mix of tenure is provided for in the areas zoned for Regeneration in the Tallaght LAP lands and the Naas Road Framework Plan area. Such a mix shall take account of the existing or</i></p>



		<p><i>permitted tenure within a ten-minute walking distance of any proposed development and applicants for planning permission shall demonstrate, to the satisfaction of the Planning Authority, that there is no saturation of a single tenure within the defined area.</i></p> <p>It is considered that the above objectives are consistent with recent national policy under the Housing for All Strategy 2021 and enacted legislation in the Affordable Housing Act 2021.</p> <p>It is noted that the Government, as per the Housing for All Strategy 2021, is committed to continuing the policy of having mixed tenure communities, including through the mechanism of Part V of the Planning and Development Act 2000 (as amended), to ensure that social and affordable housing are part of the mix of tenure across housing developments as follows:</p> <p><i>Executive Summary</i></p> <p><i>Ireland needs an average of 33,000 homes constructed per annum until 2030 to meet targets set out for additional households, as outlined in the National Planning Framework. These homes need to be affordable, built in the right place, to the right standard and in support of climate action. They need to satisfy demand for housing across four tenures – affordable, social, private rental and private ownership.</i></p> <p><i>5.2 Support Sustainable Communities</i></p> <p><i>In this context, the Government commits to continuing the policy of having mixed tenure communities, including through the mechanism of Part V of the Planning and Development Act 2000, to ensure that social and affordable housing are part of the mix across housing developments.</i></p> <p>It is noted that as per Figure 2 of the Housing for All Strategy 2021, the percentage breakdown across each tenure type is approximately 36% New private ownership homes; 20% New private rental homes; 13% New affordable homes; 31% New social housing homes.</p> <p>NPO 4 of the NPF states:</p>
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		<p><i>Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.</i></p> <p>Therefore, having regard to NPO 4 and the provisions of the Housing for All Strategy 2021, the avoidance through policy of an over proliferation of a single type on tenure in an area is appropriate and consistent with national policy.</p> <p>It is considered that HS1 Objective 4, H1 Objective 14 and H1 Objective 16 as set out in the Draft Plan are appropriate.</p> <p><b>CE Recommendation</b></p> <p>No change to Draft Plan.</p>
<p>SD-C195-140 Landmarque Property Group</p>	<p>The submission indicates they are owners of the ABB Site, Belgard Road, Tallaght, Dublin 24 and are currently preparing an application for residential development at the subject lands. The subject lands are located within the boundaries of the Tallaght Local Area Plan 2020.</p> <p>The submission highlights that following a review of the HNDA, it is considered apparent that SDCC has a significantly higher proportion of owner-occupied dwellings at 68% which is higher than the State and Dublin average, with and 3+ bedroom units higher than the national average. The submission considers that the HDNA set out in the Draft Plan, inappropriately concludes, based on the planning permission pipeline, that new development and planning permissions granted are likely to increase the number of smaller unit sizes to an extent that unit mix requirements for 3+ bed units should be implemented.</p> <p>The submission further contends that, when comparing the existing stock of housing of 92,393 No. in South Dublin and the required units of the lifetime of the plan (13,260) as set out in within Chapter 2 of the Draft Plan, the quantity of apartment units</p>	<p><b>CE Response</b></p> <p>The submission is noted. The Draft Plan includes a Housing Strategy and Interim HNDA contained within Appendix 11 of the Development Plan which carries out an evidence-based assessment for the County up to 2028. H1 Objective 12 of the Draft Plan seeks to examine the need to vary the Development Plan, following the publication of the guidance on HNDA methodology issued by the Department of Housing, Local Government and Heritage in April 2021. Therefore, a further review of household composition will be examined and updated if deemed necessary.</p> <p>Furthermore, its noted that Eastern and Midland Regional Assembly (EMRA) have substantiated the Housing Strategy and Interim HNDA and have stated in their submission “the ‘Housing Strategy and Interim HNDA’ provide a robust evidence-based framework to inform the housing policies in the Draft CDP including requirements for specialist provision and social and affordable housing, subject to the publication of any future revised ‘Housing Strategy’ Guidelines under Section 28 that may require further housing need and demand assessment to be taken into account”. Therefore, it is considered that the Interim HDNA carries out an evidence-based assessment for the County and there are adequate provision in plan to update if required.</p>

<p>delivered is insignificant in comparison to the future requirement over the lifetime of the plan. The submission argues that there is a demand and need for apartment dwellings due to the strong net in migration and resultant new household formation. The overall share of apartments still remains low in comparison. The submission highlights that the trend towards smaller household units and apartment living should be supported not countered by the Council. It appears that this is the main rationale used to support unit mix restrictions. It is submitted that given Tallaght's strategic location in terms of public transport, it is considered to restrict development on the basis of unit mix at a high level would restrict the private rental market (one of the pillars of Rebuilding Ireland) unnecessarily and undermine the viability of apartment schemes.</p> <p>The submission refers to Section 94 (3) of the Planning and Development Act 2000 (as amended) and need to ensure housing for different level of income and contends that by placing a significant emphasis on larger units, the Local Authority is not providing for those without the ability to access a mortgage or persons in smaller households. It is submitted that the HNDA should balance the existing stock of housing by providing a more complete range of choice. The submission considers that the HNDA appears to focus on maintaining the existing situation (which is higher than the state and Dublin average) and does not define what a more balanced / sustainable housing mix is. The submission suggests that this will also reduce the delivery of new housing overall in the county, with a particular impact on the rental sector.</p> <p>The submission considered that the HDNA conclusion is a broad summary and takes the numbers of apartments permitted and constructed at face value, it does not account for the location, context, the mix of tenure and the overall quality of those schemes. Nor does it account for the existing profile of dwellings and cohort of household sizes. It is submitted that sweeping restrictions based on this assertion are inappropriate. The submission agrees that it</p>	<p><b>CE Recommendation</b> No change to the Plan.</p>
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	<p>is important to promote a mix within schemes, however it is considered that the unit mix should not be restricted on such a large scale and each proposal should be assessed on its merits.</p> <p>The submission therefore requests that Appendix 11, South Dublin Housing Strategy and Interim HNDA 2022 – 2028, be reviewed as it does not have regard to the Housing Needs and Demand Assessment (HNDA) Guidelines which were published on the 14th April 2021 and the housing targets within the report and succeeding Core Strategy and Settlement Strategy relate to ESRI 50:50 Scenario published by the Department in December 2020 which have been superseded by the new guidance.</p>	
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Supply of Housing		
Submission No.	Submission Summary	CE response and recommendation
<p>SD-C195-11 Proinsias Mac Fhlannchadha</p>	<p>The submission notes that the Core Strategy in Chapter 2 identifies capacity for approximately 23,370 units that are serviced and/or serviceable within the lifetime of the Plan period. As per Appendix 11: South Dublin Housing Strategy and Interim HNDA 2022 - 2028, it further noted that the Council acknowledges that "On average across the past 5 years up to the end of 2020, 1,278 residential units a year were built". It is submitted that as only a fraction of the lands developed which were zoned residential have been delivered over the course of the last plan, one would have to question the viability/ suitability of the lands already zoned given if only 1,278 units are completed a year that correspondingly a greater volume of lands will have to be zoned/ rezoned to meet The Housing Need for the County of 17,817 new homes up to 2028.</p>	<p><b>CE Response</b></p> <p>The submission is noted. As set out in the Two Year Progress Report in relation to the 2016-2022 South Dublin County Development Plan, Rebuilding Ireland Action Plan for Housing (the Action Plan) published in 2016 set out the government policy on tackling the national housing supply shortage across tenures. The Action Plan provided a multi-stranded, action oriented approach to increase the supply of social housing, to double the output of overall housing to at least 25,000 per annum by 2020, to service all tenure types, and to tackle homelessness in a comprehensive manner. Under the umbrella of the Action Plan, numerous significant changes were made in terms of planning legislation, policy, ministerial guidance and funding streams which, at times, slowed rather than accelerated the supply of dwelling units as the industry waited for legislation to be enacted, ministerial guidance to be published or funding mechanism to be rolled out, etc. However, a significant upturn in construction activity on foot of the Action Plan measures began to emerge in 2018 and the beginning of 2019 only to halt again due to the Covid-19 pandemic. Therefore,</p>

	<p>It is hoped that the Council would revise their standpoint on not rezoning/ zoning additional lands/ dezoning unsuitable lands as part of this Development Plan</p>	<p>concerns raised that “only a fraction of the lands developed which were zoned residential have been delivered over the course of the last plan” should be viewed in light of the succession of changes and measures introduced during this period, as well as the impact of the Covid-19 pandemic.</p> <p>In order to provide a transparent and evidence-led approach to land zoning, the Draft Plan, including Appendix 2 (Part 1) Developing the Core Strategy and (Part 2) Core Strategy Methodology, sets out the steps taken in the development of the Core Strategy which included a detailed Land Capacity Audit.</p> <p>The Land Capacity Audit, which informs the Core Strategy, comprised a comprehensive review and analysis to calculate the potential yield of undeveloped land (RES, RES-N, TC, REGEN, VC, DC, LC and SDZ) zoned in the 2016 - 2022 County Development Plan. This audit identified that there is a total Land Capacity of 1,039ha with the potential for 44,472 units. However, by excluding Long Term Strategic Lands the land capacity reduces to 477ha with the potential to accommodate 23,731 units. Within this total capacity, approximately 150 ha of Long-Term Strategic lands which can be delivered over the life of the Plan providing for more than 7,500 units are included in the land capacity figures.</p> <p>With regard to zoned land with extant permission not commenced (estimated 6,517 units) this has been recognised and factored into the Core Strategy figure. In considering such extant permissions a deliverability analysis has also been carried out and has informed the development of the Core Strategy. In addition, it is recognised that South Dublin County has a physical excess of zoned lands to meet the population and housing targets set out under national and regional policy. These lands are located, for the most part, within existing built-up areas in Dublin City and Suburbs and will, therefore, support compact growth.</p> <p>Having regard to above figures set out in the Core Strategy and the current excess of zoned land, without the need for further zoning, it is considered that there is sufficient flexibility to meet the household requirements for 2031 and potentially up to 2040. The revised target figures in response to the OPR recommendations, set out separately under the response to the OPR, do not impact on the excess land</p>
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		<p>capacity available to meet the revised targets. Therefore, to re-zone or zone new additional lands over and above those currently set out in the Draft Plan would be contrary to National and Regional planning policy.</p> <p>In support of the compact growth agenda, the Development Plan has placed a significant emphasis on deliverability, monitoring, growth, and active land management. In this regard, the Draft Plan acknowledges that the delivery of a compact growth agenda and includes a range of measures which promote development including: Policy CS3: Monitoring Population and Housing Growth and associated objectives; Policy CS4: Active Land Management and associated objectives; Policy CS6: Settlement Strategy - Strategic Planning Principles and associated objectives; and Policy CS7: Consolidation Areas within the Dublin City and Suburbs Settlement and associated objectives. It is therefore considered that the Draft Plan provides an appropriate balance between monitoring and promoting the deliverability of the development of lands zoned within the County within the lifetime of the Plan.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
<p>SD-C195-133 CAIRN Plc</p>	<p>With reference to H2 Objective 6, the submission considers it more appropriate that social housing dwelling types are not prescribed and should be undertaken through the normal Part V discussions and agreements on individual sites to reflect local housing need at the appropriate time.</p>	<p><b>CE Response</b></p> <p>The submission is noted and acknowledged.</p> <p>H2 Objective 6 states: <i>To ensure an adequate and appropriate provision of social housing across the County, particularly in relation to 1 bed and 4 bed units, through the building up of public landbanks, facilitation of the transfer of lands and other appropriate mechanisms with third parties (only where necessary) to ensure an appropriate number of and distribution of new social housing, and to avoid additional concentration of social housing above that already in existence</i></p> <p>There is nothing in the objective to indicate that social housing dwelling types are prescribed or that 'normal' Part V discussion and agreements will not continue. The objective simply notes that 1 and 4 bedroom units are particularly needed but this will be agreed through</p>

		<p>the normal Part V processes undertaken with the Housing Department of the Council and the developer.</p> <p>In respect to Part V, it is noted that the Housing Circular 28/2021 and the commencement on the 3<sup>rd</sup> September 2021 of Part 6 of the Affordable Housing Act 2021, amends Part V of the Planning and Development Act 2000. This requires a change from up to 10% for social housing to a mandatory 20% requirement, at least half of which must be applied to social housing provision and up to half of which may be applied to affordable and cost rental housing.</p> <p><b>CE Recommendation</b></p> <p>No change to the Draft Plan</p>
<p>SD-C195-302 Department of Public Health Health Service Executive</p>	<p>Submission states that adequate housing and social infrastructure will be required to accommodate the projected level of population growth, with housing and social infrastructure provision being an important social determinant of health, well-being and social development.</p>	<p><b>CE Response</b></p> <p>The submission is noted.</p> <p>The Draft Plan sets out a range of policies, objectives and provisions to support the delivery of quality housing in tandem with the necessary social and community infrastructure, including the following:</p> <p><i>CS3 Objective 6:</i></p> <p><i>To ensure the phased development of new housing areas in tandem with the delivery of physical and social infrastructure provision as identified within Local Area Plans or as informed by assessments carried out by the Planning Authority.</i></p> <p><i>COS2 Objective 1:</i></p> <p><i>To support the provision of a wide range of community facilities and to ensure that such facilities are provided in new and existing communities in tandem with housing development, with special consideration for period of review to adapt to the needs of an increasingly multi-cultural and diverse community, in accordance with the phasing requirements of Local Area Plans and Planning Schemes.</i></p> <p><i>COS6 Objective 2:</i></p>

		<p><i>To promote healthcare facilities of an appropriate scale to be provided in new communities on a phased basis in tandem with the delivery of housing, in accordance with the phasing requirements of Local Area Plans and approved Planning Schemes and in locations that are accessible by public transport, walking and cycling.</i></p> <p>It is considered that the provisions of the Draft Plan comprehensively address this issue.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
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<b>Housing for All</b>		
<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation</b>
<p><a href="#">SD-C195-264 Ne Graver</a></p> <p><a href="#">SD-C195-264 Ne Graver</a></p>	<p>The submission seeks a policy to provide Independent living for the elderly in the Rathcoole, Saggart and Newcastle areas to satisfy the growing demand for downsizing from existing residences to more suitable accommodation for their needs with access to local amenities, which would have the added benefit of releasing housing stock used by single or small families to larger families and assisting with the homeless situation in the area.</p> <p>On issues relating to older persons and housing, the submission highlights the importance of the Housing Officer to act as liaison with Agencies such as the HSE, Department of Education. Age Friendly Ireland and voluntary organisations such as the Four Districts Day Care CLG and alignment with the SDCC Age Friendly County Strategy 2020-2024.</p>	<p><b>CE Response</b></p> <p>This submission is noted.</p> <p>The Draft Plan sets out the following policies and provisions in relation to the provision of housing for older persons at a County-wide level including Policy H3: Housing for All.</p> <p>Under Section 6.3.1 Housing for Older People, the Draft Plan states:</p> <p><i>The Development Plan will seek to address the housing needs of older people within their communities, with the aim of providing a range of attractive accommodation choices for people wishing to rightsize and in turn addressing the underutilisation of larger houses, particularly within more established areas.</i></p> <p>In Section 6.3.1 it further states:</p> <p><i>South Dublin’s Housing Department has set out policy in this context and is currently proactively promoting rightsizing where appropriate, also referred to as ‘Rightsizing at the Right Time’ as part of its ongoing efforts to ensure the best use of the Council’s social housing stock.</i></p> <p>The Draft Plan also contains detailed provisions under Section 13.5.7 in relation to Retirement Villages including that Retirement Villages or</p>



		<p>housing developments made up of independent housing units, with limited / no on site care facilities will be required to locate on residentially zoned land in settlements (or where no local area plan exists, within the defined boundary of the settlement).</p> <p>The Housing Department will continue to liaise with the relevant agencies as part of its remit.</p> <p>It is considered that the provisions set out in the Draft Plan comprehensively address the issues raised in the submission.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
<p><a href="#">SD-C195-233 Cheeverstown House</a></p>	<p>The submission is seeking to amend the Specific Local Objective H3 SLO1 relating to this Cheeverstown House to read as follows: To facilitate the provision of older persons and supported living suitable housing to meet local needs as part of a de-congregation plan for Cheeverstown House in consultation with the Planning Authority. Any redevelopment must positively address the highly sensitive environmental characteristics of the site in relation to Flood Risk, the Riparian Corridor and Green Infrastructure principles.</p> <p>With regard to the Cheeverstown House site, it is submitted that H3 SLO1 as set out in the Draft Plan and the restriction it imposes on accommodating solely older persons and supported living runs counter to the National Housing Strategy for People with a Disability and should be widened to include affordable or any other suitable housing to meet the needs of the local community. Furthermore, the restriction on replacement floorspace under H3 SLO1 is considered unreasonable and should be removed as it is unsustainable to restrict the quantum of development in a Development Plan context prior to a detailed site analysis being conducted as part of the Development Management process.</p> <p>It is acknowledged that there are certain opportunities and constraints on the Cheeverstown site which will have a bearing on the nature and extent of any redevelopment proposal here and that</p>	<p><b>CE Response</b></p> <p>This submission is noted and acknowledged.</p> <p>The submission relates to H3 SLO 1 which states:</p> <p><i>H3 SLO 1:</i></p> <p><i>To facilitate the provision of older persons and supported living which positively addresses the highly sensitive environmental characteristics of the site in relation to Flood Risk, the Riparian Corridor and Green Infrastructure principles. The scale of any replacement redevelopment must not exceed the existing gross floor space of the existing use on site, discounting the floorspace of the protected structure on site.</i></p> <p>The submission raises concerns regarding the restriction the SLO imposes on accommodating solely older persons and supported living which is considered to run counter to the National Housing Strategy for People with a Disability; and to the restriction on replacement floorspace which is considered unreasonable.</p> <p>It is noted that the subject site, Cheeverstown House, a protected structure, and attendant grounds, are zoned HA-DV (To protect and enhance the outstanding character and amenity of the Dodder Valley) in the Draft Development Plan.</p> <p>It is acknowledged that H3 SLO 1, by its nature, places a specific local objective on this site to facilitate the provision of older persons and</p>

<p>this will become evident during the normal planning application process. In addition, any redevelopment of this site would fully respect the conservation status of Cheeverstown House and these other Protected Structures, as appropriate.</p> <p>Furthermore, it is submitted that any redevelopment of this site would have regard to that surrounding context in accordance with the South Dublin County's Building Height and Density Guide. Also, it is submitted that a suite of sustainable drainage measures would be incorporated into a redevelopment of the site along with a hydrobrake o restrict runoff to the river to greenfield rates. The submission includes an Engineering Assessment Report</p> <p>It is submitted that Cheeverstown's de-congregation plan to provide housing for the existing residents in a way that is more suited to their needs. Is support in the Draft Plan under H3 Objective 1.</p> <p>It is submitted that a residential redevelopment of the Cheeverstown House site would be consistent with the NPF's objective to deliver more compact urban growth. The site is within the M50, in a well-established suburb, served by excellent transport links and other existing local services. Rezoning of this site would help counteract the general trend of population decline in established suburbs such as Templeogue.</p> <p>Any development on the site would be within the footprint of what is an already developed site. The site could, in practice be considered as 'Tier 1 lands', as it is already fully connected to all relevant services and is capable of delivering homes within the lifetime of the Development Plan.</p> <p>It is submitted that the NPF also includes objectives in support of Cheeverstown's strategic aims in shifting away from their historic, institutional model. Policies NSO 10 and NSO 28 explicitly support the de-congregation plans.</p> <p>It is submitted that a residential redevelopment of the Cheeverstown House site would be consistent with the RSES promotion of compact urban regeneration which has the potential to deliver appropriate residential density of high quality design and architecture. The subject site is within walking distance of shops</p>	<p>supported living accommodation together with restrictions in relation to the quantum of the development. However, this is considered appropriate given the High Amenity zoning and the complex environmental and conservation issues at this site, while also recognising the opportunity to utilise this unique setting to address the housing needs of older people and provide for supported living. It is considered that the term 'supported living' includes for people with disabilities, with the aim of providing a range of attractive accommodation choices for people wishing to right size and/or seeking assisted living or supported housing options.</p> <p>The overall Vision under the Draft Plan in respect to Housing is ensuring the delivery of high quality and well-designed homes in sustainable communities to meet a diversity of housing needs within the County. It is considered that the H3 SLO 1 is consistent with the overarching objectives of the Draft Plan.</p> <p>However, it is noted that there are constraints on the site. Cheeverstown House, a Three Storey House, Templeogue (RPS No. 242/Map 06) is a protected structure under the Draft Plan. In addition, part of the subject site is located within the Riparian Corridor and Flood Zone B on the Draft Development Plan's Green Infrastructure and Flood Risk Map. The land is also zoned High Amenity and the SLO seeks to balance the wider environmental requirements with the flexibility to provide for new types of accommodation on the site.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
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and services, is within the M50 and has nearby access to frequent public transport services providing connections across the metropolitan area. In addition, it is submitted that the provision of new residential accommodation on the Cheeverstown House site, which is readily accessible to existing, high frequency public transport, would be in line with Smarter Travel – A Sustainable Transport Future, A New Transport Policy for Ireland 2009-2020.

It is submitted that the HSE report 'Time to Move on from Congregated Settings' (June 2011) sets the context for Cheeverstown's plans for de-congregation and provides support for these rezoning proposals.

The submission notes that the current/ proposed HA zoning of the Cheeverstown House site does not allow for residential development, except for residential development in the context of existing premises. This zoning objective would not appear to facilitate Cheeverstown's de-congregation programme as it limits redevelopment on the site to a continuance of the existing institutional style accommodation.

The submission notes that the zoning map identifies a route in the NTA Greater Dublin Cycle Network Plan to the immediate south of the Cheeverstown House site, on the opposite river bank. Cycle lanes are already in place along Templeogue Road, but are not yet in place along the River Dodder, to the south of the site. This particular route is categorised as a primary/ green route. Primary routes provide links to Dublin City Centre from urban centres, whilst green routes provide tourist, recreational and leisure routes through amenity areas such as the Dodder Valley. The site's direct access to these existing and planned cycle routes contributes to the site's suitability for a residential development.

The submission notes that 93% of South Dublin's growth up to 2028 is targeted to occur within 'Level 1- Dublin City and Suburbs' including Templeogue where the Cheeverstown House site is located. It is submitted that residential development that intensifies residential use in locations such as this is in principle encouraged in the draft Core Strategy.

	<p>The submission refers to the Cheeverstown House site's location bordering the River Dodder, which is subject to flooding and indicates that no new buildings would be located on those parts of the site which are shown on the map as being at risk of flooding. In addition, it is submitted that any redevelopment will respect the Draft Development Plan policy for a 10 metre buffer zone/riparian corridor from the top of the bank of the River Dodder in accordance with GI3 Objective 3.</p>	
<p>SD-C195-209 Avison Young</p>	<p>This submission specifically refers to subject lands (at Crooksling) situated approximately 2km to the south of Saggart Village and 5km to the southwest of City West on the N81. The circa 20.62ha site is currently vacant and comprises a number of existing buildings and was last occupied as St Brigid's Nursing Home for elderly care. The site is accessed from the N81 Tallaght to Blessington Road which bounds the west of the site. The site sits adjacent to agricultural lands to the north, east and southern boundary. The subject site is within the High Amenity Dublin Mountains HA-DM Land Use Zoning Objective.</p> <p>It is submitted that the subject site location does not align with Policy H3: Housing for All and H3 Objective 1 in that it is a relatively remote location and has no adjacent supporting services and amenities.</p> <p>The submission refers to a Specific Local Objective stated in Chapter 6: Housing states:</p> <p>"H3 SLO 2: To support the development of St. Brigid's Nursing home at Crooksling as a centre that provides for the care of older persons". In this regard, it is submitted that the specific objective is related to the previous use as a community nursing home which is quite restrictive as the existing buildings on the site are inefficient, old and constrained in terms of their potential to accommodate those standards required to be complied with by the Health Information and Quality Authority (HIQA) as well as the HSE. The existing accommodation is sub-standard and obsolescent.</p> <p>The submission notes that while the SLO is clearly intended to relate to the St Brigid's Nursing Home, this facility closed in 2020 the use of the site as a nursing home is Not Permitted under the</p>	<p><b>CE Response</b></p> <p>This submission is noted.</p> <p>The submission relates to H3 SLO 2 which states:</p> <p>H3 SLO 2:</p> <p><i>To support the development of St. Brigid's Nursing home at Crooksling as a centre that provides for the care of older persons.</i></p> <p>The subject site, the former St Brigid's Nursing home at Crooksling, is a large site located off a local access road which connects to the N81, at the foothills of the Dublin Mountains. The site is zoned HA-DM (High Amenity – Dublin Mountains) with the objective to protect and enhance the outstanding natural character and amenity of the Dublin Mountains area. There is also an objective to Protect and Preserve Significant Views on both sides of the road serving the subject site and beyond to the east. Part of the subject site lies within a proposed Natural Heritage Area (pNHA). Also within the subject site boundary are two listed sites under R149299 in the Record of Monuments and Places as follows: Cross-inscribed stone Crooksling [DU024-012002]; Ritual site - holy well Crooksling [DU024-012001]. There is also a listed building within the site under the Record of Protected Structures as follows: Crooksling Holy Well 'Site Of', Inscribed Stone Cross [RPS 381].</p> <p>The Draft Development Plan's Green Infrastructure and Flood Risk Map identifies the 'Hills' location of the area and the pNHA status on part of the site.</p> <p>In addition, the following objective under EDE21 Objective 5 is considered to be relevant to the subject site:</p>

<p>Zoning Objective HA-DM including Hospital, Housing for Older People, Nursing Home, Residential Institution, Retirement Home and some Residential uses. The submission requests that a more flexible and comprehensive SLO wording be introduced to allow for an integrated elderly care offer at the subject site and which reflects the changes in the types and models of care required to provide for an increasing cohort of elderly people with increasingly complex and diverse care needs now and into future years.</p> <p>The submission notes that the southeast corner of the subject site is included within a Proposed Natural Heritage Area (pNHA) which affords a raised level of environmental sensitivity to this area of the subject site.</p> <p>The submission refers to structures and monuments within the subject site that are included in the record of protected structures and record of monuments and places in the Draft Plan.</p> <p>The submission refers to Table 7.6 and the medium to long-term objective at N81 Blessington Road which runs to the west of the subject site for “Upgrades to N81 from M50 to county boundary”.</p> <p>It is submitted that a consolidated retirement cluster – of sufficient scale to be feasible – that includes a mix of independent living, sheltered housing and a full-time care nursing home facility in a campus type setting might be sustainable at the subject site, but that the current SLO would need to be re-worded in order to set out a greater flexibility in order to accommodate a clustered and consolidated elderly residential village model.</p> <p>It is submitted that none of the existing buildings are fit-for-purpose and are at end of life and that it would be necessary to use a more efficient and flexible new-build design solution in order to align with Access for All and current HIQA and HSE design standards and such considerations would need to be built into the specific local objective H3 SLO 2 in order for a development opportunity to be framed.</p> <p>The submission refers to the subject site’s setting within a sensitive high amenity rural uplands context within the foothills of</p>	<p>EDE21 Objective 5:</p> <p><i>To seek to protect the visual and landscape amenity of the Slade Valley and the Slade of Saggart and Crooksling Glen pNHA, support appropriate tourism and amenity related development in the context of the Slade of Saggart and Crooksling Glen pNHA and support the promotion of same as an area of amenity and natural beauty.</i></p> <p>The submission highlights concern in respect to the SLO as worded which appears to relate to the former use of the subject site as St Brigid’s nursing home, which closed in 2020, and the restrictions the SLO imposes which is to support its development as a centre that provides for the care of older persons.</p> <p>In this regard, the submission indicates that the existing buildings are considered to be sub-standard and obsolescent, particular relative to HIQA and HSE requirements. The submission also highlights that particular land uses associated with the care of older persons, such as Hospital, Housing for Older People, Nursing Home, Residential Institution, Retirement Home are not Permitted in Principle under the HA-DM zoning objective.</p> <p>With regard to the HA-DM zoning objective at the subject site, it is noted that land uses which are Permitted in Principle include: Agriculture, Car park (Not permitted above 350m contour/For small-scale amenity or recreational purposes only) and Open Space.</p> <p>Land uses which are ‘Open for Consideration’ in HA-DM zoned areas include: Bed &amp; Breakfast, Cemetery, Childcare Facilities, Community Centre, Cultural Use, Doctor/Dentist, Education, Embassy, Garden Centre, Guest House,</p> <p>Health Centre, Home Based Economic Activities, Hotel/Hostel, Industry-Extractive, Place of Worship, Public House, Public Services, Recreational Facility (directly linked to the heritage and amenity value of the Dublin Mountains), Residential (subject to rural housing policy), Restaurant/Café, Rural Industry- Food, Sports Club/ Facility, Shop-Local, Veterinary Surgery.</p>
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	<p>the Dublin Mountains and strategic green infrastructure corridor – Strategic Corridor 6: Rural Fringe Corridor – between South County Dublin and Wicklow and Kildare counties and the emphasis placed by the overarching objectives on utilising a blend of existing roads, laneways and publicly accessible lands for walking and cycling.</p> <p>In this regard, it is submitted that there is potential to create a low-impact recreational facility including a hotel/hostel at a gateway to the uplands of the Dublin Mountains and the Wicklow Mountains to the south as well as providing a hub for outward bound activities on the subject site and in the local area. It is submitted that the existing single-storey purpose built nursing home buildings would not provide the flexibility / adaptability required to repurpose as either a hostel or a hotel. The submission requests that the restriction of having to provide the hotel/hostel accommodation within existing premises to be omitted or altered in order to facilitate the potential for replacement, rather than continued vacancy and ultimately dereliction of the existing premises.</p>	<p>Criteria applies to all of the open for consideration uses, whereby they have to be either in existing premises, or subject to the rural housing policy, or within villages to serve local need.</p> <p>Crooksling nursing home’s rural location is related to its original use as a tuberculosis sanatorium before it became a nursing home. The use as a nursing home was an established non-conforming use. Such uses are assessed under section 13.1.1 (vi) of the Draft Plan on non-conforming uses.</p> <p>It is understood that the site is no longer of interest to the HSE as the residents have been re-homed to other nursing homes. It is noted that the HA-DM zoning does provide as open for consideration a number of uses which may be relevant for any proposed re-use of the existing buildings.</p> <p>The submission acknowledges that the location does not meet with policy set out in the Draft Plan for housing for older persons. As set out above, the nursing home was a long established non-conforming use. Any proposed new uses would have to be assessed against the zoning objective and related policy.</p> <p>It is acknowledged that H3 SLO 2, by its nature, does place a specific local objective on this site to support the development of St. Brigid’s Nursing home at Crooksling as a centre that provides for the care of older persons.</p> <p>Notwithstanding this, the Draft Plan sets out a comprehensive planning policy framework to facilitate and guide the preparation of development proposals, including proposals in sensitive High Amenity areas such as this, which is considered sufficient to guide future development at this site.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
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<b>Traveller Accommodation</b>		
<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation</b>
SD-C195-260 Irish Traveller Movement	The submission highlights the crisis in accommodation nationally for Travellers. Despite statutory requirements and refers to recent reports including the report Ombudsman for Children's Office 'No End in Site' and European Social Rights Institute report 'Monitoring Adequate Housing in Ireland'.	<p><b>CE Response</b></p> <p>The reference in the submission to recent reports such as the report from the Ombudsman for Children's Office 'No End in Site' and European Social Rights Institute report 'Monitoring Adequate Housing in Ireland' are noted.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
SD-C195-260 Irish Traveller Movement	The submission welcomes the clearly outlined objectives on Traveller accommodation already included in the South Dublin County Council draft development plan and sets out a series of recommendations, which are supported by Tallaght Travellers Community Development Group and Clondalkin Travellers Development Group, who are both members of the Irish Traveller Movement. These recommendations are to ensure the accommodation needs, including culturally appropriate Traveller-specific accommodation, of Travellers in the South Dublin County local authority area are met during the lifespan of the Plan.	<p><b>CE Response</b></p> <p>It is noted that the submission welcomes the clearly outlined objectives on Traveller accommodation already included in the South Dublin County Council draft development plan and indicates that the recommendations set out in the submission are to ensure the accommodation needs, including culturally appropriate Traveller-specific accommodation, of Travellers in the South Dublin County local authority area are met during the lifespan of the Plan</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
SD-C195-260 Irish Traveller Movement	The submission requests that Traveller specific accommodation developments completed under the last development plan period to be outlined in the Development Plan.	<p><b>CE Response</b></p> <p>This submission is noted. In regard to progress reports on Traveller specific such accommodation, specific reports would fall outside the remit of a County Development Plan and would be more closely aligned with the progression of Traveller Accommodation Strategy specifically. It should be noted however that the Development Plan will undergo a two year review which is a statutory requirement under the Planning and Development Acts. The written statement or 'Progress Report' sets out the review and provides an update on the status of securing key policies and objectives of the Plan and highlighting key projects and areas where the Council is working with stakeholders to deliver results in accordance with the Plan provisions.</p> <p><b>CE Recommendation</b></p>

		No change to the Plan.
SD-C195-260 Irish Traveller Movement	The submission requests that projects committed to under the 2019-2024 Traveller Accommodation Programme be listed as objectives in the Development Plan with clear timelines as per the Housing (Traveller Accommodation) Act 1998 PART III (27) (10).	<p><b>CE Response</b></p> <p>This submission is noted. The County's Traveller Accommodation Programme (TAP) 2019-2024 sets out the Council's plans for the provision of accommodation for the Travelling community over a five-year period and identifies the location of Traveller Accommodation Sites. The County's TAP is therefore the pre-eminent document in relation to the location and delivery of such sites. The Draft Plan policies, objectives and provisions relating to the provision of Traveller Accommodation are informed by and aligned with the South Dublin County's Traveller Accommodation Programme (TAP) 2019-2024 (and any superseding programmes agreed by the Council).</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
SD-C195-260 Irish Traveller Movement	The submission requests that sites be identified and zoning of land for Traveller specific accommodation, including transient accommodation, be mapped and illustrated in the programme, in line with the Planning and Development Act, (2000) as amended, particularly s10(2)(i) which requires that a Development Plan include objectives for: 'The provision of accommodation for Travellers, and the use of particular areas for that purpose.'	<p><b>CE Response</b></p> <p>This submission is noted. The Traveller Accommodation Programme (TAP) has identified a list of indicative locations for Traveller Accommodation with sites to be selected depending on need. Any sites shown for traveller accommodation on the Draft Plan Maps are ones that are contained in the agreed TAP 2019 – 2024 which was adopted by the elected members. In line with Policy H4 the Draft Plan seeks to implement the Traveller Accommodation Programme and any superseding programmes agreed by Council.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
SD-C195-260 Irish Traveller Movement	The submission recommends that consideration be given for how sites will be identified for the next Traveller Accommodation Programme, including transient sites, given the lifespan of the development plan, such as a system of monitoring and reviewing at regular intervals the provisions outlined in the Development Plans as they relate to Traveller accommodation. In this regard, the submission suggests that the inclusion of an ethnic identifier	<p><b>CE Response</b></p> <p>This submission is noted. With regard to the next Traveller Accommodation Programme, a review of the Traveller Accommodation Programme 2019-2024 is scheduled to be carried out in early 2022. Following the review, any amendment to the proposed accommodation programme must be made within 7 months.</p> <p>The point raised in regard to the commitments set out in the Draft Plan are noted. In regard to identifying sites for the next Traveller</p>



	would improve the quality of data collection and monitoring of provision of accommodation for Travellers.	Programmes or the inclusion of an ethnic identifier improve the quality of data collection and monitoring of provision of accommodation for Travellers, this would fall outside the remit of a County Development Plan and would be more closely aligned with the progression of Traveller Accommodation Strategy and the Local Traveller Accommodation Consultative Committee and Housing Strategic Policy Committee specifically. <b>CE Recommendation</b> No change to the Plan.
SD-C195-260 Irish Traveller Movement	The submission highlights Section 94 (2) of the Planning and Development Act, 2000, as amended, which sets out that Development Plans should ensure that they counteract undue segregation. With this in mind, it is submitted that sites identified for Traveller specific accommodation should be well located, close to key amenities, and chosen in consultation with the community. Plans should include sufficient green areas and children's play areas.	<b>CE Response</b> This submission is noted. The County's Traveller Accommodation Programme (TAP) 2019-2024 sets out the Council's plans for the provision of accommodation for the Travelling community over a five-year period and identifies the location of Traveller Accommodation Sites. The TAP is supported by Policy H4 of the Draft Plan 2022-2028 and its associated objectives, which seeks to ensure that Traveller Accommodation is located in proximity to services, including public transport, and is integrated with communities to include access to schools, GPs, shops, playgrounds and sports clubs. <b>CE Recommendation</b> No change to the Plan.
SD-C195-260 Irish Traveller Movement	The submission recommends that all [Traveller specific accommodation] developments be carried out with consultation at every stage of the process, with prospective residents, local Traveller organisations and with the Local Traveller Accommodation Consultative Committee.	<b>CE Response</b> This submission is noted. There are statutory requirements and processes, including appropriate consultation and engagement with stakeholders, pertaining to the preparation of the County Development Plan and the Traveller Accommodation Programme. <b>CE Recommendation</b> No change to the Plan.
SD-C195-260 Irish Traveller Movement	The submission recommends that the Development Plan identify Travellers as a priority group in its plans to address homelessness and identify what tangible steps will be taken to reduce the overrepresentation of Travellers in homeless figures. This should also take into account the high level of hidden homelessness,	<b>CE Response</b> This submission is noted. As set out in Section 8.3 of the Draft Plan 'Social Inclusion and Community Development', the County Development Plan is primarily a spatial land-use plan. However, it has

	<p>where families are living in chronic overcrowding, or without basic facilities of their own, or security of tenure, with plans to alleviate this clearly outlined.</p>	<p>the potential through its policies and objectives to impact positively on the lives of citizens through facilitating the provision of social and community facilities which are vital to quality of life and wellbeing.</p> <p>The Draft Plan includes policies which tackle homelessness at a County wide level including the following:</p> <p><i>H1 Objective 3:</i></p> <p><i>To ensure that adequate and appropriate housing is available to meet the needs of people of all incomes and needs including traveller households, older persons, people with disabilities, and the homeless, through an appropriate mix of unit types and tenures provided in appropriate locations and in a manner appropriate to their specific needs.</i></p> <p><i>H1 Objective 17:</i></p> <p><i>To support the provision of homeless accommodation and/or support services which is inclusive and treats all persons with dignity and respect in a balanced way located throughout the County and not concentrated in any particular areas and to incorporate consultation with other homeless support services in supporting this service.</i></p> <p><i>H3 Objective 7:</i></p> <p><i>To ensure that those with specific housing needs, such as older persons, persons with disabilities, homeless persons, Travellers and people leaving Direct Provision, are accommodated in a manner appropriate to their specific needs and in a timely fashion.</i></p> <p>The Plan also recognises that mainstream approaches to planning, design and development may not always meet the needs of minority and marginalised groups and more focused consideration is sometimes required. Social inclusion is a priority that cuts across many of the Council's functions and Section 8.3.1 acknowledges the various local plans and strategies relevant to social inclusion that the Council have been involved in preparing such as:</p> <ul style="list-style-type: none"> <li>• Social Inclusion and Community Activation Programme (2018-2022)</li> <li>• South Dublin County Council Integration Strategy (2019-2023) – A More Inclusive County:</li> </ul>
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		<ul style="list-style-type: none"> <li>• South Dublin County Traveller Accommodation Programme (2019-2024):</li> </ul> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
SD-C195-260 Irish Traveller Movement	The submission highlights the need for an appropriate baseline studies on Traveller accommodation to be carried out as part of integrated Housing Need and Demand Assessments for Development Plans, if this has not already occurred.	<p><b>CE Response</b></p> <p>This submission is noted. The directive on preparing the HNDA is set out under the Department of Housing, Local Government and Heritage (DoHLGH) repository of Housing Need and Demand Assessment guidance and source material [available at: <a href="https://www.gov.ie/en/publication/eaa99-housing-need-and-demand-assessment-hnda/">https://www.gov.ie/en/publication/eaa99-housing-need-and-demand-assessment-hnda/</a>].</p> <p>National Policy Objective 37 of the National Planning Framework (NPF) provides for a Housing Need and Demand Assessment (HNDA) to be undertaken in each local authority area to support the preparation of housing strategies and all related housing policy outputs, for example: city and county development plans, local area plans. This is to ensure that the plan-making system is supported by a robust methodology to inform policies and funding initiatives around housing and associated land requirements.</p> <p>In accordance with Circular 14/2021, as guidance was not available in time for the integration into this Development Plan, this Housing Strategy is supported by an Interim HNDA. Notwithstanding this, as per Policy H1, the Council is committed to carrying out a review of the Housing Strategy as part of the mandatory Two-Year Development Plan review.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
SD-C195-260 Irish Traveller Movement	The submission recommends that South Dublin County Council consider, in this process, how future Development Plans could have their timelines aligned with the timelines of TAPs, for a more integrated approach, in line with the recommendations of the Expert Review on Traveller Accommodation.	<p><b>CE Response</b></p> <p>This submission is noted. The timelines associated with the preparation of the Development Plan and the preparation of the Traveller Accommodation Programme are set out in legislation and are outside the remit of the Development Plan or the Council.</p>

		<p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
SD-C195-260 Irish Traveller Movement	The submission recommends that the Development Plan reference the work being done on a national level to implement the recommendations of the Expert Review on Traveller Accommodation and commit to incorporating the work and decisions of the programme board into its future processes.	<p><b>CE Response</b></p> <p>This submission is noted. As per Section 1.2 of the Draft Plan, the purpose and scope of the Plan is to set out an overall strategy for the proper planning and sustainable development of the County. In making the Plan members are restricted to considering the proper planning and sustainable development of the area to which the Development Plan relates, the statutory obligations of any Local Authority in the area, and any relevant policies or objectives for the time being of the Government or any Minister of the Government. The Act also sets out mandatory objectives that must be included in a Development Plan. It is not possible, therefore, for the Draft Plan to reference and incorporate numerous individual reports and recommendations. Notwithstanding this, the policies, objectives and provisions of the Draft Plan are informed by and align with the overarching national and regional planning policy framework and Ministerial Guidance. For instance, section 6.4 of the Draft Plan sets out a number of objectives including H4 Objective 4 which states:</p> <p><i>To ensure that all Traveller Accommodation is provided to the highest standard following detailed consultation with local communities and Traveller advocacy groups.</i></p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
SD-C195-260 Irish Traveller Movement	The submission recommends that the Development Plan reference the Council's strategy to implement the recommendations of the recent Irish Human Rights & Equality Commission Equality Review on the provision of Traveller accommodation in the South Dublin area.	<p><b>CE Response</b></p> <p>This submission is noted. As per Section 1.2 of the Draft Plan, the purpose and scope of the Plan is to set out an overall strategy for the proper planning and sustainable development of the County. In making the Plan members are restricted to considering the proper planning and sustainable development of the area to which the Development Plan relates, the statutory obligations of any Local Authority in the area, and any relevant policies or objectives for the time being of the Government or any Minister of the Government. The Act also sets out mandatory objectives that must be included in</p>

		<p>a Development Plan. It is not possible, therefore, for the Draft Plan to reference and incorporate numerous individual reports and recommendations. Notwithstanding this, the policies, objectives and provisions of the Draft Plan are informed by and align with the overarching national and regional planning policy framework and Ministerial Guidance. These policies and objectives provide for Traveller Accommodation to be provided to the highest standard following detailed consultation with local communities and Traveller Advocacy groups. It is noted that a Human Rights and Equality Framework is currently being developed for the Council.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
SD-C195-260 Irish Traveller Movement	<p>The submission highlights issues around energy poverty in Traveller Specific Accommodation and requests that the Council plan to review existing Traveller specific accommodation with a view to bringing it up to the current regulatory standards in terms of energy efficiency of the dwellings and in terms of access to sustainable energy sources and ensuring that there is access to the competitive energy provision market for Travellers living in Traveller-specific accommodation and that Travellers in Traveller specific accommodation have access to accurate, individual energy bills in order to monitor and control their own energy costs.</p>	<p><b>CE Response</b></p> <p>This submission is noted.</p> <p>The Draft Plan sets out a number of policies, objectives, guidance and provisions to reduce the energy demand and improve the energy performance in existing and new development such as:</p> <p><i>E2 Objective 1:</i></p> <p><i>To seek to reduce the reliance on fossil fuels in the County by reducing the energy demand of existing and new development.</i></p> <p><i>Policy E3: Energy Performance In Existing and New Buildings</i></p> <p><i>Support high levels of energy conservation, energy efficiency and the use of renewable energy sources in new and existing buildings including the retro fitting of energy efficiency measures in the existing building stock in accordance with relevant building regulations, national policy and guidance and the targets of the National and South Dublin Climate Change Action Plans.</i></p> <p><i>E3 Objective 1:</i></p> <p><i>To reduce the need for energy, enhance energy efficiency and secure the use of renewable energy sources in refurbished and upgraded dwellings and other buildings through the design and location of new</i></p>

		<p><i>development, in accordance with relevant building regulations and national policy and guidance.</i></p> <p><i>E3 Objective 2:</i></p> <p><i>To prioritise the retrofitting of buildings over demolition and reconstruction where possible to reduce the large quantities of embodied carbon energy generated from building materials when building from the ground up.</i></p> <p><i>E3 Objective 3:</i></p> <p><i>To require all new development to be designed to take account of the impacts of climate change, and that energy efficiency, energy provision and renewable energy measures are incorporated in accordance with national building regulations and relevant policy and guidelines.</i></p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
SD-C195-260 Irish Traveller Movement	The submission requests that all planned Traveller specific accommodation seek to ensure that homes built have the highest level of building airtightness combined with effective ventilation systems and meet near zero energy building (NZEB) requirements under current regulatory requirements.	<p><b>CE Response</b></p> <p>This submission is noted. As per Section 13.10.1 of the Draft Plan, the nZEB (near zero energy) building standards will apply to all new buildings occupied after the 31st December 2020. For public sector bodies, the standard applies to all new buildings owned and occupied by the 31st December 2018. There are transitional arrangements in place in the Building Regulation which can allow for relaxing of requirements where work on the buildings commenced prior to these dates. nZEB will be implemented in Ireland through Part L of the Building Regulations.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
SD-C195-237 Caitriona McClean	The submission welcomes the commitments made in the Draft Plan in respect to Traveller Accommodation and would like to see greater transparency on this issue and regular progress reports provided together with on-going first hand consultation taking place	<p><b>CE Response</b></p> <p>The point raised in regard to the commitments set out in the Draft Plan are noted. In regard to progress reports on such accommodation, specific reports would fall outside the remit of a County Development Plan and would be more closely aligned with the progression of</p>

	<p>rather than through third parties to ensure than the needs of the travelling community are better understood.</p>	<p>Traveller Accommodation Strategy and the Local Traveller Accommodation Consultative Committee and Housing Strategic Policy Committee specifically. It should be noted however that the Development Plan will undergo a two year review which is a statutory requirement under the Planning and Development Acts. The written statement or 'Progress Report' sets out the review and provides an update on the status of securing key policies and objectives of the Plan and highlighting key projects and areas where the Council is working with stakeholders to deliver results in accordance with the Plan provisions.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
<p>SD-C195-144 CAIRN Plc</p>	<p>The submission notes the Traveller Accommodation objective in Newcastle contained in Map 7 and highlights the relative concentration of such sits in the southwest of the County.</p> <p>It is considered that this objective should be moved elsewhere within the County to the south or east where there is an absence of such accommodation or objectives.</p> <p>In the event that the TA accommodation site is not relocated it is considered that there is a more suitable location within the Newcastle area for such a site.</p>	<p><b>CE Response</b></p> <p>The submission is noted and acknowledged.</p> <p>The County's Traveller Accommodation Programme (TAP) 2019-2024 sets out the Council's plans for the provision of accommodation for the Travelling community over a five-year period and identifies the location of Traveller Accommodation Sites. The County's TAP is therefore the pre-eminent document in relation to the location and delivery of such sites. The TAP is supported by Policy H4 of the Draft Plan 2022-2028 and its associated objectives, which seeks to ensure that Traveller Accommodation is located in proximity to services, including public transport, and is integrated with communities to include access to schools, GPs, shops, playgrounds and sports clubs.</p> <p>It is noted the TAP has identified a list of indicative locations for Traveller Accommodation with sites to be selected depending on need. Of these indicative areas, Newcastle has been identified. Any sites shown for traveller accommodation on the Draft Plan Maps are ones that are contained in the agreed TAP 2019 – 2024 which was adopted by the elected members.</p> <p>It is noted that each local authority, following a consultation process, has to prepare, adopt and implement a 5 year rolling accommodation programmes to meet the existing and projected accommodation needs of travellers in their areas. The current TAP was adopted by the Council in 2019. A review of the Traveller Accommodation</p>

		<p>Programme 2019-2024 is scheduled to be carried out in early 2022. Following the review, any amendment to the proposed accommodation programme must be made within 7 months.</p> <p>It is noted that the Draft Plan includes policy objectives aimed at creating an inclusive County and supporting the provision of housing for all and the Council have a number of programmes and plans that provide more focused social housing policy and/or proposals which includes the TAP. Moreover, H1 Objective 10 and COS1 Objective 3 of the Draft Plan specifically seek to implement the policies, objectives and unit target set out under the South Dublin Traveller Accommodation Programme (TAP) 2019-2024 and review the programme as required and implement such programmes with a social inclusion and community development focus.</p> <p>It is therefore considered inappropriate at this time to move the Traveller Accommodation objective from its current location.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
<p><a href="#">SD-C195-75</a> <a href="#">Hennie Kallmeyer</a></p>	<p>Submission relates to lands at Busty Hill, Naas Road, Co. Dublin, immediately north of N11 Junction 5, for the rezoning of approx. 17 ha from RU to EE, in order to facilitate the timely release of zoned REGEN lands on the Naas Road/Ballymount area. The submission looks for the following two amendments to the Draft Plan to enable the relocation of core activities:</p> <p>- Amendment 1: The lands at Busty Hill are rezoned from Objective RU (To protect and improve rural amenity and to provide for the development of agriculture) to Objective EE (To provide for enterprise and employment related uses). (Map attached with submission highlighting lands)</p> <p>Submission highlights the benefits of the highly accessible exiting road infrastructure, with access to the N7/M7, with the provision of EE uses reinforcing existing logistic and warehouse uses established on lands in the immediate area.</p> <p>Submission goes on to state that the proposed zoning would maximise the opportunity of the motorway interchange for</p>	<p><b>CE Response</b></p> <p>The submission is noted and acknowledged. The County's Traveller Accommodation Programme (TAP) 2019-2024 sets out the Council's plans for the provision of accommodation for the Travelling community over a five-year period and identifies the location of Traveller Accommodation Sites. The County's TAP is therefore the pre-eminent document in relation to the location and delivery of such sites. The TAP is supported by Policy H4 of the Draft Plan 2022-2028 and its associated objectives, which seeks to ensure that Traveller Accommodation is located in proximity to services, including public transport, and is integrated with communities to include access to schools, GPs, shops, playgrounds and sports clubs.</p> <p>It is noted the TAP has identified a list of indicative locations for Traveller Accommodation with sites to be selected depending on need. Of these indicative areas, Newcastle has been identified. Any sites shown for traveller accommodation on the Draft Plan Maps are ones</p>



	<p>employment generating uses, while supporting policies within the National Planning Framework, Regional Spatial and Economic Strategy and the Draft Plan. The proposed zoning can facilitate the future consolidation of the City footprint at sustainable densities through the regeneration of underutilised and brownfield sites and can support and enable the relocation of the landowners activities to a more appropriate employment location.</p> <p>- Amendment 2: Removal of the TA objective from lands adjacent Athgoe Junction (J5) of the N7.</p> <p>Submission contends that the area is not an appropriate location for residential development, due to the site not being located near adequate educational and healthcare facilities, public transport or any retail, community, recreational and support facilities.</p> <p>Submission further states that traveller accommodation at this site would be inconsistent with NPO 28 of the NPF and RPO 9.2 of the RSES.</p> <p>A File note from Clifton Emerson on Water, Foul Drainage and Traffic Impact was attached with this submission, which was also noted and considered.</p>	<p>that are contained in the agreed TAP 2019 – 2024 which was adopted by the elected members.</p> <p>It is noted that each local authority, following a consultation process, has to prepare, adopt and implement a 5 year rolling accommodation programmes to meet the existing and projected accommodation needs of travellers in their areas. The current TAP was adopted by the Council in 2019. A review of the Traveller Accommodation Programme 2019-2024 is scheduled to be carried out in early 2022. Following the review, any amendment to the proposed accommodation programme must be made within 7 months.</p> <p>It is noted that the Draft Plan includes policy objectives aimed at creating an inclusive County and supporting the provision of housing for all and the Council have a number of programmes and plans that provide more focused social housing policy and/or proposals which includes the TAP. Moreover, H1 Objective 10 and COS1 Objective 3 of the Draft Plan specifically seek to implement the policies, objectives and unit target set out under the South Dublin Traveller Accommodation Programme (TAP) 2019-2024 and review the programme as required and implement such programmes with a social inclusion and community development focus.</p> <p>The comments in relation to consistency with policy are noted and it is considered that this can be reviewed as part of the review of the Traveller Accommodation Programme.</p> <p>It is therefore considered inappropriate at this time to move the Traveller Accommodation objective from its current location.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
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Other Housing Provision		
Submission No.	Submission Summary	CE response and recommendation
SD-C195-78 Recorder	The submission would like to see provision made in the development plan for a quota of smaller homes to be included in order for local people to down-size within the area that they have	<b>CE Response</b>

<p>Residents Associarion</p>	<p>lived their lives. Tantamount to Village Life is cited – to allow people to continue to live at home and dependency and companionship could be taken care of by ex-neighbours who would still live close by. This practice could benefit many areas of the city in looking after our elderly citizens.</p>	<p>The submission is noted. The Draft Plan sets out a number of the policies, objectives, development management standards and requirements and other provisions to support the delivery of a mix of dwelling types in the County as follows:</p> <p><i>Policy QDP10: Mix of Dwelling Types</i></p> <p><i>Ensure that a wide variety of housing types, sizes and tenures are provided in the County in accordance with the provisions of the South Dublin County Council Housing Strategy 2022-2028.</i></p> <p><i>H1 Objective 3:</i></p> <p><i>To ensure that adequate and appropriate housing is available to meet the needs of people of all incomes and needs including traveller households, older persons, people with disabilities, and the homeless, through an appropriate mix of unit types and tenures provided in appropriate locations and in a manner appropriate to their specific needs.</i></p> <p><i>Section 13.5.2 Mix of Dwelling Types</i></p> <p><i>The overall dwelling mix in residential schemes should provide for a balanced range of dwelling types and sizes to support a variety of household types. On smaller infill sites, the mix of dwellings should contribute to the overall dwelling mix in the locality.</i></p> <p>In addition, the Draft Plan contains specific provisions in relation ‘rightsizing’ which is an older person’s active, positive choice to move home as a way of improving their quality of life. The Plan states that the ability to rightsize depends on both the availability and accessibility of housing options that people feel would improve their quality of life. This often involves moving to smaller housing units. This is supported by policy and objectives including the following:</p> <p><i>Policy H3: Housing for All</i></p> <p><i>Support the provision of accommodation for older people and people with is abilities and/or mental health issues within established residential and mixed use areas offering a choice and mix of accommodation types within their communities and at locations that are proximate to services and amenities.</i></p>
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<p>SD-C195-254 Deputy Emer Higgins</p>	<p>The submission is concerned by the under-delivery of new homes in the Dublin Mid West area and the lengthy waiting lists for social homes, and therefore suggests that additional sites, in particular brown field sites near major transport hubs, should be zoned for residential development.</p>	<p><b>CE Response</b></p> <p>The submission is noted and acknowledged. As per Section 1.9 of the Draft Plan, the Core Strategy aims to maximise the potential of the County to deliver a compact settlement form in line with National and Regional population targets, where a strong focus has been placed on regeneration and the redevelopment of brownfield over green field lands. An overall total of 94% of the allocated unit growth is within Dublin City and suburbs with approximately half of allocated lands identified as brownfield. In addition, almost half of the County's growth has been allocated to strategic development areas identified within the Metropolitan Area Strategic Plan. This is supported by policies such as:</p> <p><i>Policy CS1: Strategic Development Areas</i></p> <p><i>Prioritise housing and employment growth within the identified residential and employment growth areas set out under the Metropolitan Area Strategic Plan.</i></p> <p><i>CS3 Objective 1:</i></p> <p><i>To ensure that sufficient zoned land is available to satisfy the housing and population requirements of the County, as set out under the</i></p>

		<p><i>Ministerial Guidelines for Housing Supply and the Regional Spatial and Economic Strategy, over the lifetime of the Plan and to ensure that brownfield sites are prioritised for development over greenfield sites in line with the Regional Strategy.</i></p> <p>The Draft Plan acknowledges, however, that brownfield lands can present challenges in terms of contaminated sites, landownership and site assembly, phasing and sequencing. In this regard and to ensure housing delivery, a degree of flexibility has been built into the distribution of the housing and population targets, in line with national and regional policy, to ensure an adequate supply to meet demand. The flexibility provided in the location of housing delivery will be closely monitored to ensure it complies with the core strategy of the Draft Plan, taking account of the function of each settlement.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
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<b>Quality of Residential Development</b>		
<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation</b>
<p><a href="#">SD-C195-281</a> <a href="#">Dublin Friends of the Earth</a></p>	<p>This part of the submission suggests opening up housing estates where cul de sacs and high walls are preventing access to nearby amenities, which will improve permeability to these areas and encourage more active travel throughout the community.</p>	<p><b>CE Response</b></p> <p>The issues raised in regard to opening up housing estate cul de sacs in order to improve permeability throughout the County is noted. The Plan supports increasing permeability and accessibility throughout with the following objectives of particular note:</p> <p><i>QDP5 Objective 2:</i></p> <p><i>To promote measures to improve pedestrian and cycle safety and convenience, including new or enhanced permeability links within all areas and pedestrianisation within identified centres.</i></p> <p><i>SM2 Objective 2:</i></p> <p><i>To create a comprehensive and legible County-wide network of safe cycling and walking routes that link communities to key destinations, amenities and leisure activities through implementation of the Cycle</i></p>

		<p><i>South Dublin project, the recommendations of the Sustainable Movement Studies and other permeability measures.</i></p> <p><i>SM2 Objective 4:</i></p> <p><i>To ensure that connectivity for pedestrians and cyclists is maximised and walking and cycling distances are reduced in existing built-up areas, by removing barriers to movement and providing active travel facilities in order to increase access to local shops, schools, public transport services and other amenities, while also taking account of existing patterns of anti-social behaviour and other unintended consequences of removal of such barriers.</i></p> <p>It is considered that the above provisions will facilitate increased permeability throughout the County and therefore no change is recommended.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
<p>SD-C195-114 John Spain Associates</p> <p>SD-C195-115 John Spain Associates</p>	<p>The submission refers to H10 Objective 3 “To consider the need for housing units to provide enough space to allow for individuals to work from home”. In this regard, the submission indicates that BTR schemes typically provide suitable amenities for residents in the form of co-working spaces in tandem with other services available to residents on site and noted that there is no requirement to provide such facilities in traditional build-to-sell schemes.</p>	<p><b>CE Response</b></p> <p>The submission is noted. The Draft Plan sets out provisions in Section 13.5.5 in relation to Build-to-Rent / Shared Living Accommodation and notes that all proposed BTR accommodation must comply with SPPR 7 and SPPR 8 as set out under the of the Apartment Guidelines.</p> <p>While there is no similar requirement as part of any SPPR, the Draft Plan has included the objective to reflect the changing needs of society and the increasing opportunity for people to work from home. To omit this objective would be considered a retrograde step.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan</p>
<p>SD-C195-237 Caitriona McClean</p>	<p>The submission asks SDCC to provide additional material regarding insights as a result of lockdown in the context of the pandemic, such as greater access to outside personal space per household and closer proximity to shared spaces for exercise and recreation, and to explain what impact that has had on planning considerations and to furnish your insights to ABP.</p>	<p><b>CE Response</b></p> <p>The submission is noted. In regard to preparing a report on insights as a result of the lockdown, this is considered to be a central government and not a Draft Plan matter. Notwithstanding this, it is noted that resources such as the Central Statistics Office ‘Covid-19 Information Hub [available at: <a href="https://www.cso.ie/en/releasesandpublications/ep/p-">https://www.cso.ie/en/releasesandpublications/ep/p-</a></p>

		<p>covid19/covid-19informationhub/] contains statistical information and survey reports on a range of issues relating to the pandemic, including Health, Social and Well-being.</p> <p>It should be noted however that the Draft Plan aims to strive towards the delivery of connected neighbourhoods and the 10-minute settlement concept through the promotion of a compact settlement form and sustainable movement. Such provisions aim to ensure that all facilities and services are accessible within a 10-minute walk or cycle from home or accessible via public transport services</p> <p>The Draft Plan contains policies and objectives for public open space which takes account of the need for accessible and multi-functional open space, Table 8.10 of the Draft Plan sets out a hierarchy of open space aligned to distances from the home to guide development and which will align with the Parks and Open Space Strategy, currently in preparation.</p> <p>Policy and objectives are also contained within the Economic Chapter of the Draft Plan in relation to home-working and hubs. Furthermore, objectives of the Draft Plan also support home working through encouraging developers to consider space for working from the home, live-work and work-live type units. .</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
<p>SD-C195-109 South Dublin Conservation Society</p>	<p>The submission welcomes that there is to be no new greenfield land zoned for housing and that brownfield sites is the focus. To ensure sustainable communities, apartments should not be the smallest permitted, and should have sufficient storage and access to decent outdoor spaces with planting.</p>	<p><b>CE Response</b></p> <p>This submission is noted and acknowledged. As per section 2.6 Core Strategy, based on the housing capacity of existing undeveloped zoned land in South Dublin County, there is no requirement to zone additional land to serve the needs of population and housing targets set by the Ministerial Guidelines and the NPF Roadmap.</p> <p><i>In addition, the Draft Plan includes ‘Apartment Size Safeguards’ under Section 13.5.4 Residential Standards as follows:</i></p> <p><i>In the interest of apartment sizes and promoting high quality schemes to ensure apartments are not built to a minimum standard, the following safeguards are a requirement of the Guidelines:</i></p>

		<ol style="list-style-type: none"> <li>1. <i>In private residential developments, 2-bedroom (3 persons) units cannot exceed 10% of all proposed apartment units,</i></li> <li>2. <i>The majority of apartments in any proposed scheme of 100 units or more shall exceed the minimum floor area standard for any combination of 1, 2 or 3 bed units, by a minimum of 10%. Any studio apartments must be included in the total but are not calculable as units that exceed the minimum by at least 10%.</i></li> <li>3. <i>The majority of apartments in any proposed scheme of 10-99 units or more shall exceed the minimum floor area standard for any combination of 1, 2 or 3 bed units, by a minimum of 10%. In such schemes, it is acceptable to redistribute the minimum 10% additional floorspace requirement throughout the scheme, i.e. to all proposed units, to allow for greater flexibility.</i></li> </ol> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
<p>SD-C195-109 South Dublin Conservation Society</p>	<p>A submission calls for policy H12 and Objectives to be removed from the final version of the Plan as there should be no further residential development impinging on the natural topography and scenic areas of the Dublin Mountains.</p>	<p><b>CE Response</b></p> <p>The content of the submission is noted. The Draft Plan's Policy H12 and H12 Objective 1 and H12 Objective 2 state:</p> <p><i>H12 Objective 1:</i></p> <p><i>To ensure that all developments including buildings, streets and spaces are designed and arranged to respond to and complement the site's natural contours and natural drainage features in accordance with the recommendations of the Urban Design Manual – A Best Practice Guide (2009).</i></p> <p><i>H12 Objective 2:</i></p> <p><i>To avoid the use of intrusive engineered solutions, such as cut and filled platforms, embankments or retaining walls on sites with steep or varying topography.</i></p>

		<p>These objectives should not be read in isolation but in combination with other relevant provisions of the Draft Plan, including detailed provisions relating to development in High Amenity areas such as the Dublin Mountains including Section 6.9.3 Rural Housing in HA – Dublin Mountains Zone and Policy H19: Rural Housing in HA – Dublin Mountains Zone.</p> <p>In addition, the policy and objectives apply to any steep site or one with varying topography which could be outside the Dublin Mountains.</p> <p>In this regard, it is considered that the Policy H12 and H12 Objective 1 and H12 Objective 2 are appropriate.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
<p>SD-C195-222 Tallaght Community Council</p> <p>SD-C195-154 Tallaght Community Council</p>	<p>The submission looks for an SLO for all areas where higher density residential living is deemed appropriate in the SDCC region, so new measures are adopted to enable periods of 'stay at home', 'work from home' and safe individual outdoor exercise is designed into all schemes of &gt;50 apartments.</p> <p>This submission also requests a further SLO looking for all Council built homes and those SDCC support through the Voluntary Housing Sector have adequate floor space and design to support effective home working space and infrastructure - ventilation, natural light, power connections etc.</p> <p>A further submission from Tallaght Community Council suggests that in line with new working from home requirements as per H10 Objective 3, the minimum apartment size should be adjusted to provide for larger spaces to accommodate remote working and highlights that this would make apartment living more appealing.</p>	<p><b>CE Response</b></p> <p>This submission is noted.</p> <p>The Draft Plan's H10 Objective 3 is particularly relevant to the issues as raised. It states:</p> <p><i>H10 Objective 3:</i></p> <p><i>To consider the need for housing units to provide enough space to allow for individuals to work from home.</i></p> <p>The Draft Plan also refers to the Government's Making Remote Work National Remote Work Strategy under EDE4 Objective 12 as follows:</p> <p><i>EDE4 Objective 12:</i></p> <p><i>To support the Government's Making Remote Work National Remote Work Strategy and the provision of appropriate IT infrastructure and facilities (including hubs at neighbourhood level) that enable a better life-work balance enabling people to live near their place of work.</i></p> <p>It is noted that the Remote Work Strategy is built on three fundamental pillars, bolstered by underpinning conditions. As per the Foreword in the strategy, while some people will work full-time from the office or from home, it is considered that most of us will be blended workers, working sometimes from the office and other times from home, a hub or on the go. The focus of the Remote Work Strategy therefore is on</p>



		<p>enabling legislation to support this blended model, accelerating the provision of high-speed broadband and mapping and investing in a network of remote working hubs across Ireland.</p> <p>This is supported in policies and objectives in the Economic Development and Employment Chapter 9 of the Draft Plan such as EDE12 Objective 14 as well as that listed above.</p> <p>In addition, the Draft Plan includes many policies and objectives as well as development management standards and requirements to ensure high quality design, functionality and amenity in all new residential development, with respect to both indoor and outdoor spaces. This includes the following provisions:</p> <ul style="list-style-type: none"> <li>• <i>QDP7 Objective 9</i></li> <li>• <i>Policy H10: Internal Residential Accommodation</i></li> <li>• <i>Section 6.7 Quality of Residential Development</i></li> <li>• <i>Section 6.7.2 Private and Communal/Semi-Private and Public Open Space</i></li> <li>• <i>H10 Objective 1</i></li> <li>• <i>H10 Objective 2</i></li> <li>• <i>Section 13.5.4 Residential Standards</i></li> </ul> <p>It is considered therefore that the issues raised in the submission are comprehensively addressed in the Draft Plan.</p> <p><b>CE Recommendation</b> No change to the Plan</p>
<p>SD-C195-205 Land Development Agency</p>	<p>The Land Development Agency (LDA) in their submission support the principles outlined within Policy H9 (Private and Semi-Private Open Space) regarding private open space provision, particularly the flexible approach outlined under Section 6.7.3.</p>	<p><b>CE Response</b> This submission is noted.</p> <p><b>CE Recommendation</b> No change to the Plan</p>
<p>SD-C195-205 Land Development Agency</p>	<p>In relation to H11 Objective 3 (privacy and security), which requests that all private open spaces be “enclosed within perimeter blocks behind the building line”, the Land Development Agency (LDA) in their submission requests that more clarity be provided in the Draft Plan in relation to the provision of private open space in</p>	<p><b>CE Response</b> This submission is seeking more clarity be provided in the Draft Plan in relation to the provision of private open space in the form of balconies, with particular regard to H11 Objective 3 as follows:</p>

<p>SD-C195-222 Tallaght Community Council</p>	<p>the form of balconies, which may be projected from the wall at the front of the building (ahead of the building line), where this is required in the interest of good urban design.</p> <p>A further submission makes the following points in relation to Apartments in the Draft CDP:</p> <ul style="list-style-type: none"> <li>- Request for an SLO, stating that Apartments balconies that project out from the building are vulnerable to weather (wind and rain) rendering them unsuitable to use for long periods.</li> <li>- Request for an SLO stating, Apartment balconies that are glazed do not afford the resident proper privacy to use as you would a traditional back garden. They often face into a street and allow passers-by to see into the balcony at all times.</li> <li>- Request for an SLO stating, Apartments that face onto public streets should be either set back into the building line or use a fully opaque material ( wood, stone, metal) to enclose the balcony significantly to provide robust privacy to residents so as to allow them maximise comfort levels and usage of their private amenity space.</li> </ul>	<p><i>H11 Objective 3:</i></p> <p><i>To ensure that private open spaces are enclosed within perimeter blocks behind the building line and that they are subdivided by suitably robust boundary treatments of a sufficient height and composition to provide adequate privacy and security.</i></p> <p>It should be noted that H11 Objective 3 is included in the Draft Plan on foot of Motions agreed during the Council meetings in June 2021 by the elected members.</p> <p>The Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020) issued under Section 28 Guidelines sets out provisions in respect to 'Private Amenity Space'; under 3.35 to 3.39 including the following:</p> <p><i>3.35 It is a policy requirement that private amenity space shall be provided in the form of gardens or patios/terraces for ground floor apartments and balconies at upper levels. Where provided at ground level, private amenity space shall incorporate boundary treatment appropriate to ensure privacy and security. Private amenity space should be located to optimise solar orientation and designed to minimise overshadowing and overlooking.</i></p> <p>With regard to Build-To-Rent (BTR) Units, the Apartment Standards Guidelines states:</p> <p><i>For proposals that qualify as specific BTR development in accordance with SPPR 7: (ii) Flexibility shall apply in relation to the provision of a proportion of the storage and private amenity space associated with individual units as set 29 out in Appendix 1 and in relation to the provision of all of the communal amenity space as set out in Appendix 1, on the basis of the provision of alternative, compensatory communal support facilities and amenities within the development. This shall be at the discretion of the planning authority. In all cases the obligation will be on the project proposer to demonstrate the overall quality of the facilities provided and that residents will enjoy an enhanced overall standard of amenity.</i></p> <p>The Urban Design Manual A best practice guide (Part1) (2009) states that:</p>
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		<p><i>well overlooked (natural surveillance), creating a place that does not invite criminal or anti-social behaviour (image) and local activities or uses (milieu).</i></p> <p>Having regard the above, it is recommended that H11 Objective 3 be amended as follows to allow for alternative, high quality design solutions which equally provide for adequate privacy and security in private amenity areas:</p> <p><i>H11 Objective 3:</i></p> <p><i>To ensure that private open spaces, <b>where it consists of gardens</b>, are enclosed within perimeter blocks behind the building line and that they are subdivided by suitably robust boundary treatments of a sufficient height and composition to provide adequate privacy and security. <b>In limited circumstances, some discretion may be provided for where the configuration of the space can provide for private and secure space, to a high quality, elsewhere on the site than behind the building line.</b></i></p> <p><b>CE Recommendation</b></p> <p>Amend H11 Objective 3</p> <p><b>from:</b></p> <p><i>H11 Objective 3:</i></p> <p><i>To ensure that private open spaces are enclosed within perimeter blocks behind the building line and that they are subdivided by suitably robust boundary treatments of a sufficient height and composition to provide adequate privacy and security.</i></p> <p><b>To:</b></p> <p><i>H11 Objective 3:</i></p> <p><i>To ensure that private open spaces, <b>where it consists of gardens</b>, are enclosed within perimeter blocks behind the building line and that they are subdivided by suitably robust boundary treatments of a sufficient height and composition to provide adequate privacy and security. <b>In limited circumstances, some discretion may be provided for where the configuration of the space can provide for</b></i></p>
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		<i>private and secure space, to a high quality, elsewhere on the site than behind the building line.</i>
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<b>Residential Consolidation in Urban Areas</b>		
<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation</b>
SD-C195-19 Knocklyon Network	One off infill development in estates should always fit aesthetically with the Architecture of the Estate and not be standout designs.	<p><b>CE Response</b></p> <p>The submission is noted. The Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (May 2009) set out the following under section 5.9 (d) Inner Suburban/Infill:</p> <p><i>The provision of additional dwellings within inner suburban areas of towns or cities, proximate to existing or due to be improved public transport corridors, has the revitalising areas by utilising the capacity of existing social and physical infrastructure. Such development can be provided either by infill or by sub-division:</i></p> <p><i>(i) Infill residential development</i></p> <p><i>Potential sites may range from small gap infill, unused or derelict land and backland areas, up to larger residual sites or sites assembled from a multiplicity of ownerships. In residential areas whose character is established by their density or architectural form, a balance has to be struck between the reasonable protection of the amenities and privacy of adjoining dwellings, the protection of established character and the need to provide residential infill. The local area plan should set out the planning authority’s views with regard to the range of densities acceptable within the area. The design approach should be based on a recognition of the need to protect the amenities of directly adjoining neighbours and the general character of the area and its amenities, i.e. views, architectural quality, civic design etc. Local authority intervention may be needed to facilitate this type of infill development, in particular with regard to the provision of access to backlands.</i></p> <p>It is considered that the Draft Plan provisions in relation to infill development, as set out are consistent with the Sustainable Residential Development Guidelines. Such provisions include:</p> <p>CS6 Objective 3:</p>

		<p>To promote compact growth and to support high quality infill development in existing urban built-up areas, outside Dublin City and Suburbs, by achieving a target of at least 30% of all new homes to be located within or contiguous to the CSO defined settlement boundaries (consistent with NPO 3b and RPO 3.2).</p> <p><i>CS7 Objective 3:</i></p> <p><i>To promote and support the development of undeveloped infill and brownfield zoned lands and to promote pre-application consultation in accordance with Section 247 of the Planning and Development Act, 2000 (as amended) (consistent with RPO 4.3).</i></p> <p><i>H13 Objective 2:</i></p> <p><i>To maintain and consolidate the County's existing housing stock through the consideration of applications for housing subdivision, backland development and infill development on large sites in established areas, subject to appropriate safeguards and standards identified in Chapter 13 Implementation and Monitoring.</i></p> <p>The Draft Plan also sets out significant development management requirements and standards to support and promote high quality infill development in Chapter 13 Implementation and Monitoring including specific provisions under Section 13.5.8 Residential Consolidation. These include the need for a site analysis that addresses the scale, siting and layout of new development taking account of the local context.</p> <p>It is therefore considered that the measures set out in the plan alongside national guidelines provide sufficient policy provision and guidance for infill development.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan</p>
<p>SD-C195-154 Tallaght Community Council</p>	<p><u>Population Targets</u></p> <p>The submission suggests there are inaccurate population growth figures quoted in the TTCLAP. The TTCLAP contains population targets significantly higher than the NPF and therefore requests a review to ensure sustainable planning is achieved for Tallaght. An</p>	<p><b>CE Response</b></p> <p>The Tallaght Community Council submission is noted. It covers a number of areas relating to the Tallaght Town Centre Local Area Plan. At a strategic level in the Draft Plan these are dealt with in Chapter 6</p>

	<p>overall review of development numbers on the TTCLAP is requested. In addition, The comparative density of Tallaght RGEN lands compared with Clonburris SDZ densities is deemed excessive so a request for review and reduction in number is put forward.</p> <p><u>Densities</u></p> <p>The submission calculates that the maximum density of Tallaght RGEN area is 103 dwelling per hectare and that of Clonburris is 44 dwellings per hectare, demanding for a justification on the matter. The submission highlights the emphasis on BTR within the Tallaght area and the over densification, detailing SHDs present in the area.</p> <p>In addition, it is submitted that site scoring procedures should be reviewed for Tallaght as it currently invites for over density, contrary to compact growth suggested by the NPF.</p> <p><u>Compact Growth</u></p> <p>It is argued that compact growth is not precisely defined in the NFP or the draft CDP and that therefore, it is requested that it be defined and that no exception be allowed.</p> <p><u>3 Bed Units &amp; Build-to-Rent Units</u></p> <p>The low percentage of 3beds and high numbers of BTR units with SHDs with high densities is pointed out. Material Contravention Statements are also questioned in this submission as well as the lack of understanding of cumulative impact when granting SHDs in Tallaght.</p> <p><u>SPPRs</u></p>	<p>and other aspects of the plan. For ease of reference the CE response and recommendation is broken down under a number of headings:</p> <ul style="list-style-type: none"> <li>• Population Targets</li> <li>• Densities</li> <li>• Compact Growth</li> <li>• 3 Bed Units &amp; Build-to-Rent Units</li> <li>• SPPRs</li> <li>• Site Scoping Procedures</li> <li>• NPO 6</li> </ul> <p><u>Population Targets</u></p> <p>The Draft Plan's Core Strategy and Settlement Strategy in Chapter 2 sets out population and housing figures which must be consistent with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) as required under the Planning and Development Act 2000 (as amended).</p> <p>The Tallaght Town Centre Local Area Plan (TTCLAP), as per Section 1.0, has a statutory 6 year timeframe, however its full build out, which includes significant regeneration and intensification of brownfield lands and changing character areas, is envisaged over a longer period of up to 20 years.</p> <p>In Section 2.7.1 Dublin City and Suburbs of the Draft Plan, with regard to designated 'Regeneration Areas', it states:</p> <p><i>The Cookstown and Broomhill Industrial estates in Tallaght are designated with the regeneration Zoning Objective 'REGEN' (to facilitate enterprise and/or residential led regeneration subject to a development framework or plan for the area incorporating phasing and infrastructure delivery). The delivery of these areas may require a longer lead in time as described in the Core Strategy above.</i></p> <p>It also states under Section 2.7.1 that significant areas of lands designated as Strategic Development Areas have been excluded from the land capacity over the Development Plan period except where it is considered a percentage of development can occur within that timeframe. Of the total capacity for the SDA lands, approximately 150 ha providing for more than 7,500 units has been identified as being</p>
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	<p>The submission queries the interpretation of SPPRs, as implemented in Tallaght, which contravene the NPF.</p> <p><u>NPO 6</u></p> <p>The submission requests a review on policy compliance as per Appendix 7 as there seems to be non conformity for example:</p> <p>National Policy Objective 6</p> <p>Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.</p>	<p>deliverable over the Development Plan period and is included in the land capacity figures in Table 9. This figure for SDA lands is informed by an understanding of the pipeline and potential for housing delivery on Council owned lands, historical trends of housing delivery on SDA lands within South Dublin and by delivery of similarly designated sites within the region.</p> <p>It is considered that the figure set out for the Tallaght Neighborhood Area which includes lands within the Tallaght Town Centre Local Area Plan is appropriate.</p> <p><u>Densities</u></p> <p>The Tallaght Town Centre Local Area Plan and Clonburris SDZ Planning Scheme and the density ranges and bands set out therein provide the localised planning framework and policy objectives for these areas and are prepared in line with national and regional objectives and Ministerial Guidance. The Development Plan provides the higher-level policy to ensure that projects are delivered in a sustainable and carefully considered manner, consistent with the national and regional policy framework and Ministerial Guidance.</p> <p>The density framework set out in the plan is therefore considered to be appropriate.</p> <p><u>Compact Growth</u></p> <p>Compact Growth is the NPF's number one strategic objective and sets a clear development outcome to grow our existing urban areas creating a priority to build on brownfield / infill development first, before considering greenfield lands.</p> <p>In Section 2.2 Overview of the NPF Strategy, the NPF sets out the following strategic measures to achieve Compact Growth in Ireland:</p> <ul style="list-style-type: none"> <li>• Targeting a greater proportion (40%) of future housing development to be within and close to the existing 'footprint' of built-up areas.</li> </ul>
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		<ul style="list-style-type: none"> <li>• Making better use of under-utilised land and buildings, including 'infill', 'brownfield' and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport.</li> <li>• Supporting both urban regeneration and rural rejuvenation through a €3 Billion Regeneration and Development Fund and the establishment of a National Regeneration and Development Agency.</li> </ul> <p><u>3 Bed Units and Build-to-Rent Units</u></p> <p>The Draft Plan sets out a number of the policies, objectives, development management standards and requirements and other provisions to support the delivery of a mix of dwelling types in the County including:</p> <p><i>Policy QDP10: Mix of Dwelling Types</i></p> <p><i>Ensure that a wide variety of housing types, sizes and tenures are provided in the County in accordance with the provisions of the South Dublin County Council Housing Strategy 2022-2028.</i></p> <p><i>Section 13.5.2 Mix of Dwelling Types</i></p> <p><i>The overall dwelling mix in residential schemes should provide for a balanced range of dwelling types and sizes to support a variety of household types. On smaller infill sites, the mix of dwellings should contribute to the overall dwelling mix in the locality.</i></p> <p>In addition, as per Section 13.5.2, the Housing Strategy and Interim HNDA contained within Appendix 11 of the Development Plan carries out an evidence-based assessment for the County up to 2028. In recognising the need to provide more family type housing within new apartments, the quantum of extant planning permissions with one and two bedroom units, and potential impact high concentrations of mono type housing has on areas, especially in regeneration areas, the Development Plan has set a benchmark for 3-bedroom units,</p> <p>The Draft Plan also sets out provisions and requirements to ensure an appropriate mix of tenure in an area including the following:</p>
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		<p><i>H1 Objective 14:</i></p> <p><i>Support the provision of a mix of tenure types across the County in creating suitable accommodation for all in promoting sustainable and mixed income communities and discourage an over proliferation of a single tenure (whether private owner occupier, private rental, social rental or affordable purchase and rental) within any local area (within a 10-minute walking distance) or Local Electoral Area, in line with the Apartment Guidelines and the provision of the Housing Strategy and Interim HNDA or any subsequent future Regional based HNDA.</i></p> <p><i>Section 13.5.3 Unit Tenure</i></p> <p><i>The Council will support the provision of a mix of tenure types across the County in creating suitable accommodation for all and will discourage undue segregation and over proliferation of a single tenure within any local area (10-minute walk of the proposed development) in line with the provisions of the Housing Strategy and Interim HNDA or any subsequent future Regional based HNDA. Further to the above requirement, Council Part 8 or Part 10 or such developments by Approved Housing Bodies for residential schemes may propose a different mix having regard to their specific function to deliver on the needs of the Council Housing Department and Housing List.</i></p> <p>The issue of a low percentage of 3 beds and high numbers of BTR units within SHDs with high densities is raised. Material Contravention Statements are also questioned in this submission as well as the lack of understanding of cumulative impact when granting SHDs in Tallaght. These are matters for An Bord Pleanála through the SHD process and are outside the remit of the Draft Plan. However, the objectives above are noted and will influence planning decisions.</p> <p><u>SPPRs</u></p> <p>Guidelines such as the Sustainable Urban Housing: Design Standards for New Apartments (2018) Urban Development and Building Height Guidelines (UD) (BHG) (2018) have been issued by the Minister for Housing, Local Government and Heritage under Section 28 of the Planning and Development Act 2000 (as amended). Planning authorities and An Bord Pleanála are required to have regard to the</p>
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		<p>guidelines and are also required to apply any specific planning policy requirements (SPPRs) of the guidelines, within the meaning of Section 28 (1C) of the Planning and Development Act 2000 (as amended) in carrying out their functions.</p> <p>Accordingly, where SPPRs are stated in Ministerial Guidance under Section 28, they take precedence over any conflicting policies and objectives of development plans, local area plans and strategic development zone planning schemes.</p> <p>It should be noted that the Draft Plan and accompanying BHDG are aligned with Section 28 Ministerial Guidelines and Specific Planning Policy Requirements.</p> <p><u>National Policy Objective 6</u></p> <p>It is noted that NPO 6 is included in the Draft Plan's Appendix 7 National and Regional Planning Policy Objectives. NPO 6 is also referred to in Section 9.0.1 of the Draft Plan as follows:</p> <p><i>Nationally, there is an objective to 'regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area'. This will become increasingly relevant as trends in retail and other sectors continue to change and urban areas look to reinvent themselves to different degrees. The place of funding under the Rural and Urban Regeneration and Development Fund in applying a tailored approach to development is set out in National Policy Objective 7 and South Dublin County has been to the fore in using this funding mechanism to best advantage in Clonburris and Adamstown SDZs and the Naas Road regeneration area.</i></p> <p>NPO 6 is also considered to be relevant to the REGEN lands zoned under the Draft Plan including the regeneration lands at Cookstown and Broomhill under the Tallaght Town Centre Local Area Plan (2020) and the Draft Plan should be amended to reflect this. The generation and rejuvenation of areas as 'environmental assets' is supported at a local level through policies and provisions set out in the TTCLAP,</p>
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		<p>including Section 7.2 Climate Adaptation – Green Infrastructure, and at a higher, more strategic level by Chapter 4 Green Infrastructure in the Draft Plan and associated Green Infrastructure and Flood Risk Maps.</p> <p><b>CE Recommendation</b></p> <p><b>Amend text under 9.0.1 Planning Policy Context from</b></p> <p><i>Nationally, there is an objective to ‘regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area’. This will become increasingly relevant as trends in retail and other sectors continue to change and urban areas look to reinvent themselves to different degrees. The place of funding under the Rural and Urban Regeneration and Development Fund in applying a tailored approach to development is set out in National Policy Objective 7 and South Dublin County has been to the fore in using this funding mechanism to best advantage in Clonburris and Adamstown SDZs and the Naas Road regeneration area.</i></p> <p>To:</p> <p><i>Nationally, <b>under NPO 6</b> there is an objective to ‘regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area’. This will become increasingly relevant as trends in retail and other sectors continue to change and urban areas look to reinvent themselves to different degrees. The place of funding under the Rural and Urban Regeneration and Development Fund in applying a tailored approach to development is set out in National Policy Objective 7 and South Dublin County has been to the fore in using this funding mechanism to best advantage in Clonburris and Adamstown SDZs and the <b>Tallaght and Naas Road regeneration area areas.</b></i></p>
<p>SD-C195-222 Tallaght</p>	<p>The submission looks for the inclusion of a new SLO looking to ensure a clear community reward for loss of green space for</p>	<p><b>CE Response</b></p>

<p>Community Council</p>	<p>housing, the identification of specific environmental projects and compensatory investment in the areas who have lost community green space to Part 8 Housing - Old Bawn, Springfield, Killinenny etc during the last CDP lifetime. These projects might be predefined to guarantee the environmental benefit e.g. wetlands creation, pollinator planting, tree trails, heritage projects.</p>	<p>The submission is noted. As per Section 8.7.1 of the Draft Plan and the 'Principles Guiding Public Open Space Provision', the Parks and Open Space Strategy 2021 – which is currently in development – will provide the basis for the upgrade, provision, management and maintenance of publicly managed parks and open spaces, complementing the Draft Plan policies and objectives relating to Parks and Public Open Space (Section 8.7) and the Green Infrastructure Strategy (Chapter 4).</p> <p>In addition, H3 Objective 4 of the Draft Plan is considered to be particularly pertinent in regard to development of open space areas which states:</p> <p>H3 Objective 4:</p> <p><i>To support community led housing developments for older people and social and Council affordable housing in established areas on lands designated with Zoning Objective "OS" (To preserve and provide for open space and recreational amenities), only where the quality and quantum of remaining public open spaces is deemed to be adequate and the amenities of the area are preserved.</i></p> <p>Such measures aim to ensure development will only take place where it can be demonstrated that the quality and quantum of remaining open space is adequate and the amenities of the area are preserved.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
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Rural Housing Strategy		
Submission No.	Submission Summary	CE response and recommendation
<p>SD-C195-217 James McInerney</p> <p>SD-C195-217 James McInerney</p>	<p>The submission notes that under the current Development Plan 0.7% of applications for one-off rural housing were granted permission and approximately 93% were refused permission. It is submitted that a high level of refusals stem from the use of the words 'exceptional circumstances' in Housing (H) Policy 22 Housing in RU Zone, which give rise to a certain degree of discretion to individual planners. It is noted that the current</p>	<p><b>CE Response</b></p> <p>This submission is noted. As per Section 6.9 of the Draft Plan, it is the policy of the Council to restrict the spread of urban generated dwellings into rural and high amenity areas in accordance with national and regional planning policy and guidance.</p>

<p>Development Plan does not include a definition for 'exceptional circumstances' but that the Draft Plan (Policy H18 Objective 1) does provide a definition in this regard. However, it is submitted that the 'exceptional circumstances' provisions are not cited in national and regional policies, or in other development plans relating to the eastern and midlands assembly area, and as such their retention in the Development Plan will continue to pose difficulties to genuine applicants for new or replacement one-off rural houses. It is submitted that national and regional policies point out that once a person satisfies the local need criteria, then the planning authority should accommodate the development. The submission also refers specifically to Section 3.2.3 of the Sustainable Rural Housing Guidelines (2005), Circular Letter SP 5/08 DEH&amp;LG, NPO 19 of the NPF and Objective 4.80 of the RSES and provisions set out thereunder in this regard.</p> <p>In addition, the submission refers to a number of planning applications relating to issues around 'local need' and 'exceptional circumstances' and submits both requirements go hand-in-hand but are treated separately under policies H17 and H18 of the Draft Plan. The submission refers to a recent High Court judgment which is considered relevant and suggests that numerous decisions to refuse planning permission for rural housing by SDCC based on exceptional circumstances without justifiable reasoning could have been successfully challenged in the High Court based on this judgement.</p> <p>The submission questions whether the retention of the wording 'exceptional circumstances' conforms with Article 43 and 56 of the (Freedom of Establishment and Freedom of Movement of Capital (European Community Treaty) and national and regional policies and objectives. The submission refers to Section 5.0 the Draft Development Plan Guidelines (2021) and suggests that the wording 'in exceptional circumstances' fails in respect to a number of factors set out therein by being vague; not clearly understood with different planners applying criteria different, and; not consistent with national policies and standards and ministerial guidelines.</p>	<p>Under Policy H17: Rural Housing Policy and Local Need Criteria the Council is committed to considering rural housing for persons who are “an intrinsic part of the rural community” or “working full-time or part-time in rural areas” as described under Section 3.2.3 (Rural generated housing) of the Sustainable Rural Housing Guidelines DEHLG (2005), Circular SP 5/08 Rural Housing Policies and PL 2/2017 Local Need Criteria in Development Plans: Conformity with Articles 43 and 56 (Freedom of Establishment and Free Movement of Capital) of the European community Treaty.</p> <p>Notwithstanding this, under H17 Objective 1, the Council is also to commence a review of the Rural Housing Policy and Local Need Criteria within six months of the adoption of the Plan and to include a public consultation as part of this process.</p> <p>This review process requires a review of Rural Housing Policy which includes H18: Rural Housing in the RU Zone and will be required to take into consideration the provisions of the Rural Development Policy 2021-2025 where the following key actions are identified:</p> <p><i>To enhance public services for rural communities, the Government will:</i></p> <p><i>Policy Measure 89</i></p> <p><i>Increase the residential occupancy of rural towns and villages while enabling the Irish countryside to continue to be a lived-in landscape by adopting a balanced approach to planning, in line with relevant national planning policy and guidelines, while avoiding unsustainable ribbon and over-spill development from urban areas.</i></p> <p><i>Policy Measure 90</i></p> <p><i>Update the Rural Housing Guidelines for planning authorities, to address rural housing in a broader rural development and settlement context.</i></p> <p>Critically, as recognised in the submission, the current Development Plan does not include a definition for 'exceptional circumstances' but the Draft Plan (Policy H18 Objective 1) does provide a definition in this regard. It should also be noted that a definition is also set out in H19 Objective 1 for HA zoning in the Dublin Mountains. As such, the Draft</p>
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	The submission recommends that these words be either deleted from Policy H18; or, if retained, should be accompanied by commentary so that an applicant can present their case accordingly. The submission welcomes Policy H17 Objective 1 and the intention to the review Rural Housing Policy and Local Need Criteria but submits that this will not include a review of the 'exceptional circumstances' wording under H18 thus causing the same difficulties for applicants.	Plan provides clear guidance in line with the Rural Housing Guidelines, on what 'exceptional circumstances' comprises.  <b>CE Recommendation</b> No change to the Plan.
<a href="#">SD-C195-178 Pat Grimes</a>	<p>The submission relates to a site located in the townland of Glassamucky, accessed off the Glassamucky Road and adjacent to the Glenasamole National School.</p> <p>The submission includes background information and documentation on the planning history of the lands, both planning applications and Development Plans and of studies carried out. It is requested that the Draft Plan provides for the reinstatement of the landowner's lands as an 'area for possible housing clusters' to allow for the construction of family dwellings by the landowner's children, pursuant to the necessary planning permission. It is submitted that having regard to the nature of the site and surroundings at present consisting of several houses in a ribbon arrangement along the Glassamucky road, the reinstatement of the former allocation is appropriate.</p>	<p><b>CE Response</b></p> <p>This submission is noted.</p> <p>Residential development within the rural hinterland is carefully managed through the Rural Housing Policy and Local Need Criteria in accordance with the Sustainable Rural Housing Guidelines (2005) and Circular SP 5/08. The policy approach promoted in the Draft Plan is considered to provide a reasonable balance between the delivery of appropriate and justifiable residential development in the rural parts of the County.</p> <p>The Draft Plan policies, objectives and provisions in relation to residential development in rural areas of the County are primarily set out under Section 6.9 Rural Housing Strategy and Section 13.5.9 Rural Housing.</p> <p>In this regard, the Council is committed under H17 Objective 1 to commence a review of the Rural Housing Policy and Local Need Criteria within six months of the adoption of the Plan and to include a public consultation as part of this process.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>

Climate Change Audit		
Submission No.	Submission Summary	CE response and recommendation
<a href="#">SD-C195-23 Gary Tyrrell</a>	The submission welcomes the new national housing policy up to 2030 and the inclusion of many climate considerations.	<b>CE Response</b>

	<p>The submission refers to the current SEAI retrofit grants and suggests changing the year of construction requirements as many are for houses constructed in 2005 or earlier.</p>	<p>This submission is noted. Grants available to improve the energy efficiency of existing dwellings such as those administered by the Sustainable Energy Authority of Ireland (SEAI), and the terms and conditions pertaining to these types of grants, is not considered to be a Draft Plan matter.</p> <p>It should be noted, however, that the Draft Plan contains a range of policies, objectives and guidance which promotes and supports thermal upgrading and energy efficiency in new and existing buildings such as Policy NCBH26, NCBH26 Objective 3, Policy QDP11, H2 Objective 1, H7 Objective 2, Policy E3 and E3 Objectives 1-4.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
<p>SD-C195-281 Dublin Friends of the Earth</p>	<p>This submission considers that the council should look at existing building stock in SDCC, to transform this into housing, which is more sustainable than building.</p>	<p><b>CE Response</b></p> <p>The submission is noted.</p> <p>The Draft Plan is committed under E3 Objective 2 to prioritising the retrofitting of buildings over demolition and reconstruction where possible to reduce the large quantities of embodied carbon energy generated from building materials when building from the ground up.</p> <p>In addition, the Draft Plan contains a range of policies, objectives and guidance which promotes and supports thermal upgrading and energy efficiency in new and existing buildings such as Policy NCBH26, NCBH26 Objective 3, Policy QDP11, H7 Objective 2, Policy E3 and E3 Objectives 1-4.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>



# **Chapter 7:**

## **Sustainable Movement**

## Chapter 7: Sustainable Movement

Introduction Sustainable Movement		
Submission No.	Submission Summary	CE response and recommendation
<a href="#">SD-C195-170 Dublin Cycling Campaign</a>	<p>The submission suggests adding “quieter neighbourhoods” to the Chapter 7 Vision to read:</p> <p>“Increase the number of people walking, cycling and using public transport and reduce the need for car journeys, resulting in a more active and healthy community, a more attractive public realm, safer streets, less congestion, reduced carbon emissions, better air quality, quieter neighbourhoods and a positive climate impact.”</p>	<p><b>CE Response:</b></p> <p>The requested addition in the Vision of Chapter 7 Sustainable Movement is deemed reasonable and the inclusion of ‘quieter neighbourhood’ is supported by the Council.</p> <p><b>CE Recommendation:</b></p> <p>To amend the Vision statement of Chapter 7 Sustainable Movement to read:</p> <p><i>‘Increase the number of people walking, cycling and using public transport and reduce the need for car journeys, resulting in a more active and healthy community, a more attractive public realm, safer streets, less congestion, reduced carbon emissions, better air quality, <b>quieter neighbourhoods</b> and a positive climate impact.’</i></p>

Sustainable Movement and Climate Action		
Submission No.	Submission Summary	CE response and recommendation
<a href="#">SD-C195-119 People Before Profit</a>	<p>The submission welcomes the focus on alternative transport methods to the private car and emphasises the need for improved infrastructure such as off-road cycle</p>	<p><b>CE Response:</b></p>

	lanes and better public transport facilities like bus shelters and public bins to achieve this.	<p>The overarching policy of the Sustainable Movement Chapter is to achieve a better balance and allocation of space between all transport modes within the County by promoting ease of movement for sustainable modes (including walking, cycling and public transport) and retaining capacity for other modes. The Council will continue to provide for all elements of the transportation network that are within its remit and will engage with external agencies including the National Transport Authority (NTA) and Transport Infrastructure Ireland (TII) to assist the delivery of sustainable transport projects that are provided at a regional or national level.</p> <p>In addition, Policy Objectives under SM1, SM2 and SM3 support the sentiment of this submission.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Plan.</p>
<a href="#">SD-C195-181 Electricity Supply Board</a>	<p>This submission states that to ensure that the South Dublin Draft CDP increases the usage of electric vehicles to the levels required, the standards should be set as in Statutory Instruments No. 393/2021_European Union (Energy Performance of Buildings) Regulations 2021. It is considered that these standards should be included under 13.8.3 of the Draft Plan.</p>	<p><b>CE Response:</b></p> <p>The submission is noted, and it is considered reasonable to amend the EV usage levels specified in the Draft Plan from 15 to 20% within the first bullet point under Section 13.8.3 Car Parking/Charging for Electric Vehicles (EVs), as per the Statutory Instruments No. 393/2021_European Union (Energy Performance of Buildings) Regulations 2021.</p> <p>In addition, the second bullet point of Section 13.8.3 Car Parking/Charging for Electric Vehicles (EVs) of the Draft Plan should be amended in order to remove the wording '<i>as required</i>'.</p> <p><b>CE Recommendation:</b></p>

		<p>To amend Section 13.8.3 Car Parking/Charging for Electric Vehicles (EVs) first bullet point to read:</p> <p>From:</p> <p><i>EV charging shall be provided in all residential, mixed use and commercial development and shall comprise 15% - 20% of the total parking spaces provided, with higher provision within this range required in urban areas.</i></p> <p>To:</p> <p><i>EV charging shall be provided in all residential, mixed use and commercial development and shall comprise <b>20%</b> of the total parking spaces provided, with higher provision within this range required in urban areas.</i></p> <p><b>And to amend the section bullet point in same section to read:</b></p> <p>From:</p> <p><i>The remainder of the parking spaces should be constructed to be capable of accommodating future charging points, as required.</i></p> <p>To:</p> <p><i>The remainder of the parking spaces should be constructed to be capable of accommodating future charging points, <del>as required.</del></i></p>
<p><a href="#">SD-C195-181 Electricity Supply Board</a></p>	<p>This submission highlights that green renewable hydrogen enables the further electrification of transport, allowing the full decarbonization of the transport sector, as well as improved air quality as the technology replaces diesel</p>	<p><b>CE Response:</b></p> <p>While the content of the submission is noted in regard to green renewable hydrogen, it is beyond the remit of the Development</p>

	<p>buses, HGV and potentially some diesel trains across Ireland.</p>	<p>Plan, which is a planned spatial strategy for the County, to incorporate notions of such.</p> <p>It should be noted however that the County Development plan, endeavors' to support Transport Authorities in the electrification of public transport links and decarbonization of the Transport sector in order to provide cleaner air and more sustainable options for the County.</p> <p>Supporting Objectives in relations to EV are present in the Draft Plan under SM7.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>
<p><a href="#">SD-C195-117 Wind Mobility</a></p>	<p>The submission highlights the benefits of introducing e-scooters as an alternative to motor vehicles. It also mentions that the Road Safety Authority commissioned a report on how e-scooters could be regulated and safely used on Irish roads. The findings suggest that powered transporters have great potential as an innovative transport solution and this is soon to be provided in the Road Traffic (Amendment) (Electric Scooter Trials) Bill.</p> <p>The submission states that new types of travel such as zero emission mobility give the opportunity to transform our towns and cities, making them greener and quieter. It is also put forward that e-scooters are energy efficient to manufacture and to operate.</p> <p>With specific regards to the Plan the following points are put forward for consideration:</p>	<p><b>CE Response:</b></p> <p>The comments on micro-mobility are noted and the inclusion of a new objective is deemed appropriate. Considering the legislation around the provision of e-s-scooters and other micro-mobility devices is being reviewed by the Government, the following wording is suggested to be included as a new objective in the Plan.</p> <p><i>'To support micro-mobility in line with legislative/statutory requirements.'</i></p> <p>Given the context of Micro-mobility it is considered that such an objective would be most appropriately located under Policy SM1: Overarching – Transport and Movement which seeks to 'Promote ease of movement within, and access to South Dublin County, by integrating sustainable land-use planning with a high-quality</p>

	<ul style="list-style-type: none"> <li>- Infrastructure to allow for more cyclists and e-scooter users.</li> <li>- Rethink busy urban areas where speed should be low to avoid accidents with pedestrians.</li> <li>- Providing parking for e-scooters which might include the removal of car parking in spaces.</li> <li>- Regulations to avoid placement of e-scooters on footpaths.</li> <li>- The development of physical and visual maps so users know where they can go and at what speed.</li> <li>- Encourage data share for monitoring.</li> </ul> <p>The submission also details case studies such as the one in Nottingham, Milan and Tel Aviv and show track records of working with cities in many continents on the provision of micro-mobility sharing.</p>	<p>sustainable transport and movement network for people and goods'</p> <p><b>CE Recommendation:</b></p> <p>To amend the Draft plan to include a new objective under SM1: Overarching – Transport and Movement to read:</p> <p><i>SM1 Objective (X) 'To support micro-mobility in line with legislative/statutory requirements'.</i></p>

<p><a href="#">SD-C195-210 Dublin Commuter Coalition</a></p> <p><a href="#">SD-C195-170 Dublin Cycling Campaign</a></p>	<p>Two submissions makes reference to ebikes and the lack of mention of such in the Draft Plan. It is mentioned that they provide benefits over longer journeys or more strenuous journeys while offering a zero-emission option. It is required that the Plan makes provision for such transport alternative.</p> <p>In addition, one submission notes that the Draft Plan makes no reference to the potential of cargo bikes as a mode of displacement of delivery vans / trade vehicles. Given their economic and energy efficiency nature it is required that cargo bikes form a part of future planning of South Dublin.</p>	<p><b>CE Response:</b></p> <p>The comments on micro-mobility set out in the submission are noted and, therefore, the inclusion of a new objective is deemed appropriate. Considering the legislation around the provision of e-scooters and other micro-mobility devices is being reviewed by the Government, the following wording is proposed to be included in the plan under sustainable movement policy 1</p> <p>SM1 Objective X: <i>‘To support micro-mobility in line with legislative/statutory requirements.’</i></p> <p>It is also noted that there is no deafferentation between cargo bikes and bikes and that as such policies supporting bicycle infrastructures apply to cargo bikes.</p> <p>In addition, it is suggested to amend Section 13.8.1 Bicycle Parking/Storage Standards:</p> <p>From:</p> <p><i>Short Stay: These are to be designed for ease of use by the general public. Such spaces should be located in highly visible areas that are easy to access.</i></p> <p>To:</p> <p><i>Short Stay: These are to be designed for ease of use by the general public. Such spaces should be located in highly visible areas that are easy to access <b>and allow for cargo bikes.</b></i></p> <p><b>CE Recommendation:</b></p>
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		<p>To amend the Draft plan to include a new objective under SM1 to read:</p> <p><b>SM1 Objective X:</b></p> <p><i>'To support micro-mobility in line with legislative/statutory requirements.'</i></p> <p>And, to amend Section 13.8.1 Bicycle Parking/Storage Standards:</p> <p>From:</p> <p><i>Short Stay: These are to be designed for ease of use by the general public. Such spaces should be located in highly visible areas that are easy to access.</i></p> <p>To:</p> <p><i>Short Stay: These are to be designed for ease of use by the general public. Such spaces should be located in highly visible areas that are easy to access <b>and allow for cargo bikes.</b></i></p>
<p><a href="#">SD-C195-163 Gas Networks Ireland (GNI)</a></p>	<p>This submission highlights the importance of Compressed Natural Gas (CNG) to address transport emissions with reduced carbon emissions. GNI would welcome the inclusion of CNG and CNG infrastructure in the Sustainable movement chapter and suggest the following text for consideration:</p> <p><u><i>Compressed Natural Gas (CNG)</i></u></p> <p>CNG is natural gas that has been compressed to fit into a vehicle's tank and is particularly suitable for use in commercial vehicles. The development of CNG</p>	<p><b>CE Response:</b></p> <p>All sustainable methods of reducing CO2 and NOX2 are welcomed. However, the Development Plan is a strategic spatial land use plan with a remit of supporting and facilitating the development of successful transport outcomes in the County. As highlighted in Chapter 7, the Plan includes numerous policies and objectives to reduce our emissions and the impact of transport on climate change. The requirement for a detailed understanding of a particular requirement such as Compressed Natural Gas is not considered necessary.</p>



	<p>Infrastructure will enable fuel switching from diesel to CNG for heavy goods vehicles (HGVs) and buses. CNG is an established technology that is used in many countries around the world. CNG contains virtually no particulate matter (PM) and has low emission levels of nitrogen oxides (NOx). CNG vehicles can be run on 100% biomethane. Biomethane is a renewable and carbon neutral fuel, produced via AD plants from existing waste streams and a variety of sustainable biomass sources, including grass, animal waste, crop residues and food waste. Infrastructure development for CNG is already underway in Ireland, with 14 fast fill CNG stations being installed across the Core TEN-T road network via a project called the Causeway Study that is supported by the European Commission through the CEF Transport Fund and the Commission for Regulation of Utilities (CRU). The Council will support the use of gas in transport by a presumption in favour of applications for CNG refuelling infrastructure, provided planning and environmental criteria are satisfied."</p>	<p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>
<p><a href="#">SD-C195-210 Dublin Commuter Coalition</a></p>	<p>The submission reiterates national Climate Action legal obligations, as approved by all parties, to reduce emissions by &gt;50% by 2030 (7% per annum), with a view to eliminating emissions by 2050. While the submission welcomes the planned levels of modal shifts to walking and cycling, it submits that they are iterative rather than transformational and will not be sufficient to achieve this legal and moral imperative. It is stated that it represents a very low level of ambition when compared to our European comparators and that SDCC underestimates the willingness of the silent majority of all ages and abilities to embrace sustainable transport given appropriately safe, consistent, prioritised infrastructure.</p>	<p><b>CE Response:</b></p> <p>The content of the submission is noted. The Draft Plan mode share targets have been informed by existing habits, and an understanding of the timescales required to deliver the type of connected active travel and public transport network facilitate a modal shift. These targets are based on current baseline analysis of the County and take into consideration the various settlements of South Dublin which comprise of various degrees of population density and urban/rural/Semi-Rural characteristics.</p> <p>The minimum targets are set at a County level and based on the 2016 Census data. They will be considered again as part of the 2-year review of the Plan to ensure continuous development of</p>

	<p>The submission details that multiple exemplars in Europe of cities that have already achieved significantly higher modal share of sustainable travel modes than SDCC is targeting by 2028 (eg 70-80% in Paris). The submission also comprises a methodology for cycling from DG Mobility and Transport. (Starter =5-10% modal share; Climber = 10-20%, Champion = 20%+)</p>	<p>projects in a phased manner and in line with updated Census data.</p> <p>The increase in target mode shares is based on numbers of total journeys. For example, an increase in cycling from 5% to 10% is a 100% increase in the number of journeys taken by bike out of all the journeys taken within the County throughout the 6-year Plan. Therefore, this represents a substantial shift in the number of users who would be moving towards this active travel mode option.</p> <p>The Draft Plan provides for a number of Objectives which aim to support this shift under SM1 Overarching Transport and Movement, SM2 Walking and Cycling and SM3 Public Transport.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>
<p><a href="#">SD-C195-213 An Taisce</a></p>	<p>The submission welcomes the Draft Plan's proposed modal share targets but would encourage the Council to be more ambitious and aim for the aforementioned Smarter Travel targets stating that commuting journeys made by car should drop from 65% to 45% by 2020 while commuter journeys by walking, cycling and public transport should increase to account for 55%.</p> <p>According to data presented in the Draft Plan, private car use accounts for 62% of the modal split in South Dublin. Public transport stands at 20%, walking at 13% and cycling at 5%. While that split is largely better than national averages, significant change is still needed.</p> <p>The submission requests strong implementation measures, namely robust targeted and timeline plans,</p>	<p><b>CE Response:</b></p> <p>The content of the submission is noted. The Draft Plan mode share targets have been informed by existing habits, and an understanding of the timescales required to deliver the type of connected active travel and public transport network required to facilitate a modal shift. These targets are based on current baseline analysis of the County and take into consideration the various settlements of South Dublin which comprise of various degrees of population density and urban/rural/Semi-Rural characteristics.</p> <p>The minimum targets are set at a County level and based on the 2016 Census data. They will be considered again as part of the 2-year review of the Plan to ensure continuous development of</p>

	<p>should be included throughout the CDP's transport objectives so that the new Development Plan can actually deliver on its sustainable transport objectives and modal shift targets.</p> <p>It also recommends that the Plan include targeted policies for the delivery of the Cycle South Dublin programme.</p> <p>The submission also recommends the inclusion of an explicit policy ensuring that sufficient public transport capacity as well as safe cycling and pedestrian infrastructure be provided prior to or in tandem with any new residential development.</p> <p>The submission also notes that buses are currently the only public transport option in the Ballyboden/Rathfarnham area at the foot of the Dublin Mountains, careful transport planning is needed so as not to exacerbate the already chronic congestion situation in the area.</p>	<p>projects in a phased manner and in line with updated Census data.</p> <p>The increase in target mode shares is based on numbers of total journeys. For example, an increase in cycling from 5% to 10% is a 100% increase in the number of journeys taken by bike out of all the journeys taken within the County throughout the 6-year Plan. Therefore, this represents a substantial shift in the number of users who would be moving towards this active travel mode option.</p> <p>The Draft Plan provides for a number of Objectives which aim to support this shift under SM1 Overarching Transport and Movement, SM2 Walking and Cycling and SM3 Public Transport.</p> <p>In particular, the following objectives should be noted:</p> <p><b>SM1 Objective 4:</b> <i>To ensure that future development is planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe and attractive street environment for pedestrians and cyclists, in accordance with RPO 5.3 of the RSES/MASP.</i></p> <p><b>SM3 Objective 7:</b> <i>To support and encourage the NTA in investigating high-capacity public transport solutions for Dublin south-west, including examining the feasibility of Metro and/or Luas, serving areas including Ballyboden, Ballycullen/Oldcourt, Firhouse, Kimmage, Knocklyon, Rathfarnham, South Tallaght, Templeogue and Terenure.</i></p> <p>Furthermore, Cycle South Dublin includes improvements to the existing network and new 'Now', 'Soon' and 'Later' schemes to be progressed over the next 2, 5 and 8 years, respectively as per Table 7.1 of the Draft Plan. A further separate phase of works to</p>
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		<p>facilitate cycling will be delivered by the NTA associated with the BusConnects project.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>
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Overarching Policies and Objectives		
Submission No.	Submission Summary	CE response and recommendation
<a href="#">SD-C195-54 Transport Infrastructure Ireland</a>	<p>The submission welcomes policy set out under section 5.4.1, referring to Local Area Plans to be prepared for areas. TII welcome that new Local Area Plans are proposed to be undertaken for Clondalkin, Kingswood – Naas Road and Ballyboden.</p> <p>While Policy objective QDP 14 objective 14 is also welcomed, TII suggest a commitment to undertake a Local Transport Plan in accordance with the TII/NTA Area Based Transport Assessment (ABTA) Guidelines.</p> <p>TII suggest the following amendments:</p> <p>QDP14 Objective 2</p> <p>To promote a layered approach to the preparation of Local Area Plans which designs in at an early stage the receiving baseline environment and builds on the opportunities this presents for placemaking, having particular regard to the enhancement of green infrastructure networks for</p>	<p><b>CE Response:</b></p> <p>The Council will be working closely with the NTA in modelling the transport needs of Clondalkin, Kingswood – Naas Road and Ballyboden as part of proposed LAP's.</p> <p>SDCC supports the key aims in the development of an Area Based Transport Assessments as part of the LAP process.</p> <p>Maximise the opportunities for the integration of land use and transport planning by including the ABTA process as integral to the preparation of the Plan;</p> <p>Assess the existing traffic, transport and movement conditions within the Plan area and in its wider context;</p> <p>Plan for the efficient movement of people, goods and services within, to and from the Plan area;</p> <p>Identify the extent to which estimated transport demand associated with the emerging local development objectives can be supported and managed on the basis of existing transport assets;</p>

	<p>biodiversity and amenity and a sustainable transport assessment.</p> <p>In addition, TII suggest consultation during the preparation of the Local Transport Plans and Local Area Plan processes.</p>	<p>Identify the transport interventions required within the Plan area and in the wider context, to effectively accommodate the anticipated increase in demand.</p> <p>Public Consultation will be an integral part of the development of Local Area Plans in accordance with the provisions of the Planning and Development Act 2000 (as amended).</p> <p>In addition, Objective SM6 Objective 8 of the Draft Plan sets out the following:</p> <p><b>SM6 Objective 8:</b> <i>To require all major traffic generating development to submit a Mobility Management Plan/Workforce Plan and/or Traffic and Transport Assessment.</i></p> <p>The Council will be having regard to TTI ABTA and the EU (7.9.1) when carrying out such assessments and deem acceptable to include a new objective which requires Transport Plans to be included in any LAP process, commensurate to the scale of the Plan.</p> <p><b>CE Recommendation:</b></p> <p>To include a new objective under Policy SM 1 Overarching – Transport and Movement:</p> <p><i>SM1 Objective (X) 'To require a Local Transport Plan to be prepared as part of any Local Area Plan, commensurate to the scale of the Local Area Plan.'</i></p> <p>The Local Transport Plan/Local Area Plan will be subject to screening for AA and SEA.</p>
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<p><a href="#">SD-C195-54 Transport Infrastructure Ireland</a></p>	<p>The submission welcomes the statement that a Sustainable Movement Report for the County will accompany the Plan as well as policies and objectives relating to Green Infrastructure under Chapter 4 and blue assets under Chapter 3. As such, the submission recommends early consultation in relation to any potential interactions and impacts for the national road network.</p> <p>The submission welcomes policy and objective SM6 Objective 4, which aims to maintain and protect the safety, capacity and efficiency of National roads and associated junctions in accordance with the Spatial Planning and National Roads: Guidelines for Planning Authorities, DECLG (2012).</p> <p>In relation to lands adjoining National Roads to which speed limits greater than 60 km/h apply, the DoECLG Guidelines state that the policy of the planning authority will be to avoid the creation of any additional access point from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60 km/h apply. The submission is concerned that there is no specific policy stipulating the above restriction in relation to national roads in the draft plan.</p> <p>TII suggest the inclusion of the following objective under policy SM6 Traffic and Transport Management:</p> <p>To avoid the creation of any additional access points from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60 km/h apply.</p>	<p><b>CE Response:</b></p> <p>The support from TII is noted and consultation with TII is part of the process with regards to any potential impact on National Roads.</p> <p>Under section 7.7.2 ‘New Street and Road Proposals’ The Draft Plan sets out that ‘Through traffic primarily occurs along the M50 Motorway, two National Roads (N4 and N7) and one National Secondary Road (N81). The management of these roads is the responsibility of TII. The Council will continue to work with TII to support major improvements to the national road network and to maintain and protect the safety, capacity and efficiency of national roads and associated junctions in accordance with the Spatial Planning and National Roads: Guidelines for Planning Authorities, DECLG (2012).’</p> <p>SM6 Objective 4 further sets out ‘To maintain and protect the safety, capacity and efficiency of National roads and associated junctions in accordance with the Spatial Planning and National Roads: Guidelines for Planning Authorities, DECLG (2012), the Trans-European Transport Networks (TEN-T) Regulations and with regard to other policy documents such as the TII M50 Demand Management Report 2014 and the N4 and N7 Corridor Study 2017’.</p> <p>It is considered that the Draft Plan sufficiently covers the importance of maintaining the integrity of the existing road network under Policy Objective SM4 Strategic Road Network.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>
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<p><a href="#">SD-C195-54 Transport Infrastructure Ireland</a></p>	<p>The submission welcomes policy set out under section 5.4.1, referring to Local Area Plans to be prepared for areas. TII welcome that new Local Area Plans proposed to be undertaken for Clondalkin, Kingswood – Naas Road and Ballyboden.</p> <p>Policy objective QDP 14 objective 14 is also welcomed. However, TII suggest a commitment to undertake a Local Transport Plan in accordance with the TII/NTA Area Based Transport Assessment (ABTA) Guidelines.</p> <p>TII suggest the following objectives:</p> <p>QDP14 Objective 2</p> <p>To promote a layered approach to the preparation of Local Area Plans which designs in at an early stage the receiving baseline environment and builds on the opportunities this presents for placemaking, having particular regard to the enhancement of green infrastructure networks for biodiversity and amenity and sustainable transport assessment.</p> <p>In addition, TII suggest consultation during the preparation of the Local Transport Plans and</p> <p>Local Area Plan processes.</p>	<p><b>CE Response:</b></p> <p>The Council will be working closely with the NTA in modelling the transport needs of Clondalkin, Kingswood – Naas Road and Ballyboden as part of proposed LAP's.</p> <p>SDCC supports the key aims in the development of an Area Based Transport Assessments as part of the LAP process.</p> <p>Maximise the opportunities for the integration of land use and transport planning by including the ABTA process as integral to the preparation of the Plan;</p> <p>Assess the existing traffic, transport and movement conditions within the Plan area and in its wider context;</p> <p>Plan for the efficient movement of people, goods and services within, to and from the Plan area;</p> <p>Identify the extent to which estimated transport demand associated with the emerging local development objectives can be supported and managed on the basis of existing transport assets;</p> <p>Identify the transport interventions required within the Plan area and in the wider context, to effectively accommodate the anticipated increase in demand.</p> <p>Public Consultation will be an integral part of the development of a LAP process for the above-mentioned locations and the level of detail would be appropriate to the scale of the LAP.</p> <p>In addition, the Draft Plan provides the following Policy Objective:</p> <p>SM6 Objective 8: To require all major traffic generating development to submit a Mobility Management Plan/Workforce Plan and/or Traffic and Transport Assessment.</p>
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		<p>The Council will be having regard to TTI ABTA and the EU (7.9.1) when carrying out such assessments deem acceptable to include a new objective which requires Transport Plans to be included in any LAP process, commensurate to the scale of the Plan.</p> <p><b>CE Recommendation:</b></p> <p>To include a new objective under Chapter 7 Policy SM6 Objective X to read:</p> <p><i>'To require a Local Transport Plan to be carried out as part of any LAP preparation process, commensurate to the scale of the LAP.'</i></p> <p>The Local Transport Plan/Local Area Plan will be subject to screening for AA and SEA.</p>
<a href="#">SD-C195-54 Transport Infrastructure Ireland</a>	The submission concurs with the provisions of the plan that Park and Ride facilities should be identified as part of a coherent strategy rather than identified and progressed on an individual basis and recommends early consultation in relation to any potential impacts for the national road network	<p><b>CE Response:</b></p> <p>The general observations of Transport Infrastructure Ireland in regard to park and ride facilities are noted.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>
<a href="#">SD-C195-54 Transport Infrastructure Ireland</a>	The submission contends that the local need criteria set out under Chapter 6 is not applicable to national roads as established under the Section 28 Ministerial Guidelines 'Spatial Planning and National Roads Guidelines for Planning Authorities' (DoECLG, 2012). While it is noted that the said objective refers to rural settlements, the	SM6 Objective 4 seeks 'To maintain and protect the safety, capacity and efficiency of National roads and associated junctions in accordance with the Spatial Planning and National Roads: Guidelines for Planning Authorities, DECLG (2012), the Trans-European Transport Networks (TEN-T) Regulations and with regard to other policy documents such as the TII M50 Demand



	<p>absence of any specific guidance relating to national roads, under rural housing policy is considered to be ambiguous.</p> <p>The submission suggests a cross reference is required in Section 5.3 Sustainable Rural Neighbourhoods of the Draft Plan with Objective SM6 Objective 4 and the avoidance of the creation of any new direct access points from development or the generation of increased traffic from existing direct access/egress points to the national road network, to which speed limits greater than 60 km/h apply.</p>	<p>Management Report 2014 and the N4 and N7 Corridor Study 2017'.</p> <p>Policy QDP12 Objective 5 relates to the eligibility to pertaining to local need criteria and any planning application will be assessed based on the ensemble of policy objective of the Plan. This will include having due regards to Policy SM6 Objective 4 which ensures the safeguarding of the capacity and efficiency of National roads.</p> <p>It is therefore not considered necessary to repeat or cross reference objectives through the plan.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>
<p><a href="#">SD-C195-54 Transport Infrastructure Ireland</a></p>	<p>The submission notes that Table 7.5 of the Draft Plan sets out a 6 Year Roads Programme which are in addition to the relevant major schemes included in the National Development Plan. The Authority acknowledges that it is beneficial to schedule projects, but that TII is not likely to be responsible for these projects. Additional improvements relating to national roads identified at a local level should be done in consultation with and subject to the agreement of TII.</p> <p>The submission also comments on the following objectives:</p> <p>SM2 SLO 1- TII advise that structures crossing national roads are subject to separate approvals/agreements and TII Technical Acceptance in advance of development.</p> <p>Consultation should be undertaken with TII Structures Section and TII may not be responsible for the funding of</p>	<p><b>CE Response:</b></p> <p>The observations with regards to Table 7.5 6 Year Road Programme are noted and the comments on the SLOs are also acknowledged.</p> <p>The Council will seek to engage with TII prior to progressing any proposals that could have an impact on the National Road Network.</p> <p>With regards to structures crossing National Roads, as per intended under Table 7.5, there are no specific locations for an underpass identified at present and it is also supported that the Council will liaise with Transport Infrastructure Ireland and ensures that TII would be consulted in the event that a proposed location for an underpass is identified.</p>

	<p>any such schemes or improvements which will have to cross one of the busiest stretches of the national road network.</p> <p>SM4 SLO 2 - TII advise that structures impact national roads are subject to separate approvals/agreements and TII Technical Acceptance in advance of development. Consultation should be undertaken with TII Structures Section and TII may not be responsible for the funding of any such schemes or improvements. Clarity on the potential location of underpass required.</p> <p>SM6 SLO 3 - SDCC is advised to ensure that the mitigation measures and costs identified and associated with providing or upgrading does not interfere with the operation and safety of the national roads network.</p>	<p>Finally, Section 7.7.1 of the Draft Plan states the following:</p> <p><i>'The Council will continue to work with the NTA and TII to protect the capacity of these important strategic roads.'</i></p> <p>It is also suggested that the falling under Section 7.7.2 be amended:</p> <p>From:</p> <p><i>The Council's proposals for the short and medium to long term development of the regional road network are outlined in Tables 7.5 and 7.6.</i></p> <p>To:</p> <p><i>The Council's proposals for the short and medium to long term development of the regional road network are outlined in Tables 7.5 and 7.6 <b>and are subject to consultation with TII.</b></i></p> <p><b>CE Recommendation:</b></p> <p>To amend Section 7.7.2 to include the following:</p> <p>From:</p> <p><i>The Council's proposals for the short and medium to long term development of the regional road network are outlined in Tables 7.5 and 7.6.</i></p> <p>To:</p>
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		<i>The Council's proposals for the short and medium to long term development of the regional road network are outlined in Tables 7.5 and 7.6 and are subject to consultation with TII.</i>
<a href="#">SD-C195-54 Transport Infrastructure Ireland</a>	<p>The submission welcomes the inclusion of Objective SM6 Objective 8. In addition, it is set out that the Design Manual for Roads and Bridges (DMRB) has been superseded and all relevant design standards for national roads are now included in TII Publications.</p> <p>It also states that an objective could be included in order to advise on requirements for Road Safety Audit.</p>	<p><b>CE Response:</b></p> <p>The support of Policy Objective SM6 Objective 8 and the updated TII Publications are noted.</p> <p>The Plan is strategic in nature and therefore, mention of RSA requirements is not deemed necessary as the Council is required to engage with all relevant Transport Authorities on any proposals relating to National Roads.</p> <p>In addition, separate to the CDP, the Council has a Road Safety Officer responsible for implementing a Road Safety Action Plan for the County.</p> <p><b>CE recommendation:</b></p> <p>No Change to the Draft Plan.</p>
<a href="#">SD-C195-54 Transport Infrastructure Ireland</a>	<p>TII's submission states that changes to light rail infrastructure and therefore disruption to the Luas network service should be avoided. In addition, any works adjacent or interfacing with Luas infrastructure must be carried out in accordance with TII's 'Code of engineering practice.</p> <p>The submission also highlights that lights/structures should not be erected if they have the potential to interfere with the views of the tram driver in the interest's safety in areas parallel to the light rail line. It submitted that TII's Light Rail Environment - Technical Guidelines for Development 'Code of engineering practice for works on, near, or</p>	<p><b>CE Response:</b></p> <p>Development proposals located in close proximity to the Luas are referred to Transport Infrastructure Ireland as a prescribed body through the Development Management process. Details regarding light rail and its objectives are considered and detailed within Section 7.6.2 of the Draft Development Plan and under Policy Objectives SM3: Public Transport – Rail, Transport Interchange and Park and Ride. Having regard to the content of the submission it is considered that a new objective should be supported within this section of the plan as follows:</p>

	<p>adjacent the Luas light rail system' are also referred to in the context of under Section 7.6.2 Rail under Existing Luas Lines, in Chapter 12 under the neighbourhoods settlements of Citywest / Saggart / Rathcoole / Newcastle, Tallaght and Naas Road and Section 13.4.7 Signage – Advertising, Corporate and Public Information.</p> <p>The submissions request the amendment of SM3 Objective 20 to include for “To support the existing service and investigate additional capacity on the Luas Red Line, to service the intensification of development in Tallaght and Fortunestown and the future development of the Naas Road lands.”</p>	<p>SM3 Objective X: <i>‘To ensure planning applications adjacent to the Luas, which have the potential to impact on light rail infrastructure are carried out in accordance with Transport Infrastructure Irelands ‘Code of Engineering Practice’ as may be amended.’</i></p> <p>It is considered such provision will ensure development proposals adhere to such guidance.</p> <p>With regards to Policy Objective SM3 Objective 20, it is considered that the requirements of the National Planning Framework and the Eastern and Midland Regional Assembly, to promote compact growth, is supported by Draft Development Plan in its current objective and therefore is deemed appropriate.</p> <p><b>SM3 Objective 20:</b> <i>‘To support existing services and investigate additional capacity on the Luas Red Line, to service the intensification of development in Tallaght and Fortunestown and the future development of the Naas Road lands.’</i></p> <p><b>CE Recommendation:</b></p> <p>To amend the Draft Development Plan to include a new objective under Policy SM3 to read:</p> <p><i>‘SM3 Objective X: ‘To ensure planning applications adjacent to the Luas, which have the potential to impact on light rail infrastructure are carried out in accordance with Transport Infrastructure Irelands ‘Code of Engineering Practice’ as may be amended.’</i></p>
<p><a href="#">SD-C195-14 Department of Transport</a></p>	<p>Following the ratification by Ireland in 2018 of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD). The UNCRPD puts obligations on State Parties to ensure access for persons with disabilities to the physical environment and transportation in both urban and rural areas. In addition, the DoT request that</p>	<p><b>CE Response:</b></p> <p>A whole journey approach for person with disabilities and the issue of accessibility has been considered throughout the Draft Plan. In particular Chapter 5 Quality Design and Healthy</p>

	<p>public transport is made fully accessible to people with disabilities and consider a 'whole journey approach' which refers to all elements that constitute a journey from the starting point to destination.</p>	<p>Placemaking sets the overarching context for subsequent chapters outlining 8 key design principles for development one of which is the provision of Inclusive and Accessible communities throughout the County.</p> <p>Of particular note are QDP7 Objective 8 which seeks 'To promote and support a Universal Design Approach to residential and nonresidential development – having regard in particular to the universal design principles and guidance in relation to Buildings for Everyone, Housing and Shared Space as promoted by the Centre for Excellence in Universal Design at the National Disability Authority – ensuring that all environments are inclusive and can be used to the fullest extent possible by all users regardless of age, ability or disability consistent with RPO 9.12 and 9.13 of the RSES.</p> <p>Chapter 8 Community Infrastructure and Open Space and QDP7 Objective 10 supplements such provisions where it is an objective <i>'To promote and support the principles of universal design, ensuring that all environments are inclusive and can be used to the fullest extent possible by users regardless of age, ability or disability consistent with RPO 9.12 and 9.13 of the RSES.</i></p> <p>In addition, Chapters 6 Housing, 7 Sustainable Movement and 8 Community Infrastructure and Open Space further expand on the issues of inclusive and accessible development as they relate to their specific topics.</p> <p>South Dublin County Council will continue to engage and partner with Transport Authorities such as TII and the NTA in order to provide for access to public transport to all users.</p> <p><b>CE Recommendation:</b></p>
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		No change to the Draft Plan.
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Travel Mode Share		
Submission No.	Submission Summary	CE response and recommendation
<a href="#">SD-C195-2 Colm Garvey</a>	The submission proposes to increase the SDCC Target Mode Share for "Bus" from 20% to over >23%.	<p><b>CE Response:</b></p> <p>The Travel Mode Shares supported by the Plan reflect National and Dublin County targets which have been specifically tailored to South Dublin County. Such mode share targets have been derived following consultation with the NTA and are provided as minimum mode share targets.</p> <p>To achieve such targets the Draft Plan sets out a number of policies and objectives which support the NTA in providing greater bus transport infrastructure and multi-modal options throughout the county. Such objectives include:</p> <p><b>SM3 Objective 2:</b> <i>To facilitate and secure the implementation of major public transport projects as identified within the NTA Transport Strategy for the Greater Dublin Area (2016-2035), or any superseding document, including BusConnects, the DART expansion programme along the Kildare route, the opening of the new rail station at Kishogue and the Luas to Lucan.</i></p> <p><b>SM3 Objective 4:</b> <i>To optimise accessibility to public transport, increase catchment and maximise permeability through the creation of new and upgrading of existing walking and cycling routes linking to public transport stops.</i></p> <p><b>SM3 Objective 5:</b> <i>To facilitate an interlinked network that maximises the efficiency of existing services, reduces overall</i></p>

		<p><i>journey times and facilitates easy exchanges between modes and routes.</i></p> <p><b>SM3 Objective 6:</b> <i>To establish future public transport routes that will support the County's medium to long term development, including orbital routes to provide connectivity between outer suburban areas.</i></p> <p><b>SM3 Objective 11:</b> <i>To facilitate the delivery of the BusConnects Core Bus Corridors and seek additional bus corridor and orbital routes to serve the County by securing and maintaining any required route reservations and to ensure the BusConnects Corridors do not adversely affect the village life and livelihoods of any of our County Villages.</i></p> <p><b>SM3 Objective 12:</b> <i>To work with the NTA to secure the expansion of the bus network to serve new development and regeneration areas within the South Dublin County area including Tallaght, Naas Road, Adamstown, Clonburris, Fortunestown, Ballycullen and Newcastle.</i></p> <p><b>SM3 Objective 13:</b> <i>To support new Bus Rapid Transit (BRT) lines as a means of providing new public transport links, where rail options are demonstrated by the NTA not to be achievable over the period of the County Development Plan 2022-2028, including for the planned Metro (Metrowest) and along the Outer Ring Road and Adamstown-Citywest corridors.</i></p> <p><b>SM3 Objective 14:</b> <i>To support a review of bus services in the Naas Road environs including investment in orbital services with a view to meeting future demand and enhancing development potential of the Naas Road regeneration area.</i></p> <p><b>SM3 Objective 15:</b> <i>To support the enhancement of the Local Link Rural Transport Programme in order to provide the rural communities of the County with access to improved bus services.</i></p>
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<p><a href="#">SD-C195-70 Sean Ward</a></p> <p><a href="#">SD-C195-242 Pamela Kearns</a></p>	<p>The submissions outline that that many people must use their cars based on various reasons such as age, disability, trade, shopping and inconvenient schedules of public transport alternatives. It is stated that therefore, private transport should not be presented as an unwelcome residual transport mode in the Plan.</p> <p>The submission also provides a table detailing the growth in the number of trips by mode forecasted to 2028 in comparison to 2016. As such, concerns relating the reallocation of limited road space which would involve diminished road space for private transport are raised. In addition, concerns over congestions, delays and harmful emission are being raised.</p>	<p><b>CE Response:</b></p> <p>The issues raised in the submission are noted in regard to car-based travel and the road network. The Draft Plan recognises that road space for all road users is important and while there is a need for a shift from the car, roads remain an important form of transport for specific purposes and needs. The Draft Plan supports such need under Section 7.7.2 New Street and Road Proposals which includes the councils Six Year Road Programme (Table 7.5) and a number of Medium to Long Term Road Objectives (Table 7.6). However, to achieve the identified mode share targets, which seeks to increase the number of people using sustainable modes of transport such as walking, cycling and public transport, there is a need to achieve a balanced approach between all modes of transport.</p> <p><b>CE Recommendation:</b></p>



		No Change to the Draft Development Plan.
<a href="#">SD-C195-210 Dublin Commuter Coalition</a>	<p>The submission suggests incorporating a “decide and provide” model, in line with international best practice: we decide the city we want based on trends and broader policy goals and determine the city that will fit that model. It is recommended the methodology in the recent OECD International Transport Forum report on “Travel Transitions – shifting mobility trends” be followed in this regard.</p> <p><a href="https://www.itfoecd.org/sites/default/files/docs/travel-transitions-shifting-mobility-trends.pdf">https://www.itfoecd.org/sites/default/files/docs/travel-transitions-shifting-mobility-trends.pdf</a></p>	<p><b>CE Response:</b></p> <p>The content of the OECD Report is noted. The Draft Plan details under Chapter 5 Section 5.2.4 Connected Neighbourhoods (Short Distance Neighbourhoods) the 10-minute settlement concept, which is supported by the RSES.</p> <p>At the Neighbourhood level the Draft Plan aims to locate people in close proximity to their place of work, services, amenity and leisure facilities thereby reducing the need for car-based travel and cumulatively resulting in significant and measurable reductions in GHG emissions.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>
<a href="#">SD-C195-210 Dublin Commuter Coalition</a>	<p>The submission states that The Development Plan makes little reference to enabling integrated transport modes: allowing folding bikes or provision of bike parking adjacent to public transport stops, improving the safety, design and aesthetic of the pedestrian routes to and from public transport is a key part to increasing any modal shift to public transport.</p>	<p><b>CE Response:</b></p> <p>The content of the submission is noted. In addition to the Policy Objectives highlighted in the Draft Plan under SM2: Walking and Cycling which seeks “<i>Re-balance movement priorities towards sustainable modes of travel by prioritising the development of walking and cycling facilities and encouraging a shift to active travel for people of all ages and abilities, in line with the County targets</i>” the Draft Development Plan provides numerous Policy Objectives under Chapter 5: Quality Design and Healthy Placemaking, which aim to address the issues raised in regard to street safety, design and aesthetics. Such provisions include:</p> <p><b>QDP4 Objective 1:</b> <i>To deliver successful and sustainable neighbourhoods that are attractive, connected, vibrant and well-functioning through high quality design and healthy placemaking</i></p>

		<p><i>in a manner which reduces the need to travel, facilitates a mix of uses and the efficient use of land and infrastructure in line with the provisions of NPO 4 and 26 of the NPF and RPO's 6.12, 9.10 and 9.11 of the RSES.</i></p> <p><b>QDP4 Objective 2:</b> <i>To promote a high standard of building and urban design, creating public spaces that are distinctive, safe, universally accessible and facilitate social and cultural diversity and interaction.</i></p> <p><b>QDP5 Objective 1:</b> <i>To improve the accessibility of all identified centres (see Chapter 9 table 9.2) from the surrounding catchment area through public transport provision, sustainable transport infrastructure, incorporating high quality local linkages between public transport stops, cycle parking and car park facilities and the various attractions within each identified centre (see Chapter 7 Sustainable Movement and Chapter 12 Our Neighbourhoods for further details).</i></p> <p><b>QDP5 Objective 2:</b> <i>To promote measures to improve pedestrian and cycle safety and convenience, including new or enhanced permeability links within all areas and pedestrianisation within identified centres.</i></p> <p><b>QDP6 Objective 3:</b> <i>To promote and implement environmental and public realm improvements in existing town, village, district and local centres to a high standard and finish to ensure that the design addresses environmental quality, urban design, safety including the potential for anti-social behaviour, identity, and image.</i></p> <p><b>QDP7 Objective 6:</b> <i>To ensure that development provides an integrated and balanced approach to movement, healthy placemaking and streetscape design in accordance with the requirements of the Design Manual for Urban Roads and Streets, DTTAS and DEHLG (2013).</i></p>
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		<p><b>QDP7 Objective 10:</b> <i>To promote and support the principles of universal design, ensuring that all environments are inclusive and can be used to the fullest extent possible by users regardless of age, ability or disability consistent with RPO 9.12 and 9.13 of the RSES.</i></p> <p><b>QDP7 Objective 12:</b> <i>To develop a network of pedestrian footpaths and public spaces, which includes access to public toilets, accessible outdoor seating and facilities for people with disabilities and/or mobility impairments and based on the principles of universal design.</i></p> <p><i>In addition to the above it should be noted that it is proposed to be amended objective COS objective 14 under submission 281 to include safe bicycle parking spaces at public open spaces and recreational facilities such that COS5 Objective 14 reads as follows:</i></p> <p><i>COS5 Objective 14: To ensure that public open space and associated recreational facilities are accessible by walking, cycling and public transport, as appropriate to their position within the open space hierarchy set out in Table 8.1 <b>and include safe bicycle parking spaces at appropriate locations.</b></i></p> <p><b>CE Recommendation:</b></p> <p>Amend COS 5 Objective 14 to read as follows:</p> <p>From:</p> <p><i>COS5 Objective 14: 'To ensure that public open space and associated recreational facilities are accessible by walking, cycling and public transport, as appropriate to their position within the open space hierarchy set out in Table 8.1.'</i></p>
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		<p>To:</p> <p>COS5 Objective 14: <i>'To ensure that public open space and associated recreational facilities are accessible by walking, cycling and public transport, as appropriate to their position within the open space hierarchy set out in Table 8.1 and include safe bicycle parking spaces at appropriate locations.'</i></p>
<p><a href="#">SD-C195-259</a></p> <p><a href="#">LOKRA</a></p>	<p>The submission highlights that the greater South Dublin area, Kimmage Road Lower is a gateway to the city, however, the area is experiencing the effects of excessive traffic congestion in terms of noise pollution at night, air pollution, safety of children and vulnerable residents.</p> <p>The submission welcomes the Vision of Chapter 7 but also believes that many of the objectives are under ambitious (eg. a reduction of only 12% in private car use and an increase of 3% in bus usage) and are not in line with the ambitions stated in Policy SM3: to promote a significant shift from car-based travel.</p> <p>The submission states that existing level of congestion and saturation are already unsustainable and that to simply maintain them at this level is under ambitious. It submits that more needs to be done to encourage people to move from their cars to public transport, where journeys are not possible by walking or bike.</p>	<p><b>CE Response:</b></p> <p>The content of the submission is noted. The Draft Plan mode share targets have been informed by existing habits, and an understanding of the timescales required to deliver the type of connected active travel and public transport network required to facilitate a modal shift. These targets are based on current baseline analysis of the County and take into consideration the various settlements of South Dublin which comprise of various degrees of population density and urban/rural/Semi-Rural characteristics.</p> <p>The minimum targets are set at a County level and based on the 2016 Census data. They will be considered again as part of the 2-year review of the Plan to ensure continuous development of projects in a phased manner and in line with updated Census data.</p> <p>The increase in target mode shares is based on numbers of total journeys. For example, an increase in cycling from 5% to 10% is a 100% increase in the number of journeys taken by bike out of all the journeys taken within the County throughout the 6-year Plan. Therefore, this represents a substantial shift in the number of users who would be moving towards this active travel mode option.</p>

		<p>The issue raised in regard to encouraging a shift from cars to public transport for trips not possible by active modes is noted. The plan has set out a mode increase for public transport from 17% to 20%. In this regard it should be noted that while bus connects service improvements currently being rolled out will play an important role in achieving these minimum targets, new bus connects core bus corridors will only be delivered in the later stages of the plan period which will play a significant role in encouraging a shift to public transport/bus usage.</p> <p>The Draft Plan provides for a number of Policy Objectives which aim to support this shift under SM1 Overarching Transport and Movement, SM2 Walking and Cycling and SM3 Public Transport.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>
<p><a href="#">SD-C195-259 LOKRA</a></p> <p><a href="#">SD-C195-170 Dublin Cycling Campaign</a></p>	<p>The submission states that while the private car is unlikely to disappear, there is certainly a place for significantly increased access to shared mobility options such as. bikes, scooters and other micro</p> <p>-mobility devices with an emphasis that these should not be restricted solely to city locations.</p> <p>A number of submissions state that micro mobility devices should be integrated in plans and networks as they are essential to facilitating and supporting a just transition to providing genuine choice for everyone. Such provisions should be included in the Plan with a Micro mobility whole-of-neighbourhood consideration including:</p>	<p><b>CE Response:</b></p> <p>The comments on micro-mobility are noted. Given more recent progression on legislation by central government in regard to the provision e-scooters and other micro-mobility devices it is considered reasonable for the plan to include a new objective which would support the provision of Micro-Mobility devices in line with legislative/statutory requirements.</p> <p>SM1 Objective X: <i>‘To support micro-mobility in line with legislative/statutory requirements.’</i></p> <p><b>CE Recommendation:</b></p>

	<ul style="list-style-type: none"> <li>- e-charging bicycle/scooter storage included in designs for public realm</li> <li>- e-mobility chairs at micro-mobility points across the neighbourhood for local mobility, allowing mobility impaired people to be more mobile;</li> <li>- small e-mobility carriers for small groups such as e.g. children for schools/clubs with equipment to and from designated pick up points;</li> <li>- e-carrier mobility carts for distribution of goods for businesses.</li> </ul> <p>This would reduce private vehicular traffic in introducing initiatives for all citizens and to supporting ambitions in meeting climate change and sustainability goals.</p>	<p>To amend the Draft plan to include a new objective under SM1: Overarching – Transport and Movement:</p> <p><i>'To support micro-mobility in line with legislative/statutory requirements.'</i></p>
<p><a href="#">SD-C195-170 Dublin Cycling Campaign</a></p>	<p>The submission welcomes the emphasis on green infrastructure, placemaking and sustainable transport and the inclusion of the '10-minute city' concept but states that the modal share targets for walking and cycling in the plan are not ambitious enough. The submission proposes that a modal share targets of 20% for walking and 15% for cycling are set, and that these are measured and published annually.</p> <p>The submission submits that apart from the modal share targets, the plan does not include measurable targets and therefore, suggests including the following target that Safe walking and cycling infrastructure to be provided for</p>	<p><b>CE Response:</b></p> <p>The content of the submission is noted. The Draft Plan mode share targets have been informed by existing habits, and an understanding of the timescales required to deliver the type of connected active travel and public transport network required to facilitate a modal shift. These targets are based on current baseline analysis of the County and take into consideration the various settlements of South Dublin which comprise of various degrees of population density and urban/rural/Semi-Rural characteristics.</p> <p>The minimum targets are set at a County level and based on the 2016 Census data. They will be considered again as part of the 2-year review of the Plan to ensure continuous development of</p>

	<p>the last 0.5km to every school in the county and that progress is measured on an annual basis.</p> <p>The submission relates to SM1 Objective 1 and mentions that the NCPF set a target for modal share of cycling in Ireland - 10% - which indicates that we need to get to 20% modal share for cycling in Dublin. The NTA Bike Life survey (<a href="https://www.nationaltransport.ie/bike-life-2019-dublin-metropolitan-area/">https://www.nationaltransport.ie/bike-life-2019-dublin-metropolitan-area/</a>) found that 21% of adults don't currently cycle but would like to cycle if safe cycling infrastructure was provided.</p> <p>The submission also suggests that a more ambitious modal share target for walking should be set.</p>	<p>projects in a phased manner and in line with updated Census data.</p> <p>The increase in target mode shares is based on numbers of total journeys. For example, an increase in cycling from 5% to 10% is a 100% increase in the number of journeys taken by bike out of all the journeys taken within the County throughout the 6-year Plan. Therefore, this represents a substantial shift in the number of users who would be moving towards this active travel mode option.</p> <p>The Draft Plan provides for a number of Policy Objectives which aim to support this shift under SM1 Overarching Transport and Movement, SM2 Walking and Cycling and SM3 Public Transport.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft development Plan.</p>
<p><a href="#">SD-C195-133 CAIRN Plc</a></p>	<p>The submission supports the commentary in Chapter 7 which recognises the '10-minute neighbourhood concept' and promotes the reduction in private car-based travel from 62% currently to 50% over the course of the Plan period.</p>	<p><b>CE Response:</b></p> <p>It is noted that the submission generally supports the travel mode shares as provided under of Chapter 7 and the associated Policy Objectives.</p> <p><b>CE Response</b></p> <p>No Change to the Draft Development Plan.</p>
<p><a href="#">SD-C195-302 Department of Public Health Health Service Executive</a></p>	<p>Submission states that a model shift away from the car to walking and cycling is required, as these are more sustainable modes of travel which promote physical health, reduce traffic congestion and benefit the environment. Improvements are required to all pedestrian</p>	<p><b>CE Response:</b></p> <p>The comments of the submission are noted and reflected in the Draft Plan under Chapter 7, with specific regard given to the following Policies and Objectives which will support the County's</p>

	<p>and cycle facilities, to enable people to cycle by providing a safe network of well-lit footpaths and segregated bike lanes. Public transport provision also requires investment.</p>	<p>transition towards more active travel options to car-based transport, and to facilitate the 10-minute neighbourhood: Policy SM1: Overarching – Transport and Movement, SM2: Walking and Cycling, Policy SM3: Public Transport – General, Policy SM3: Public Transport – Bus and Policy SM3: Public Transport – Rail, Transport Interchange and Park and Ride.</p> <p>Furthermore, the provisions set out in Chapter 5 Quality Design and Healthy Placemaking and ‘The Plan Approach’ which includes Connected Neighbourhoods Promotes public transport and other transport facilities that mitigate dependence on cars, promotes safe walking and cycling, while assisting with internal movements within neighbourhoods.</p> <p><b>CE Recommendation</b></p> <p>No Change to the Draft Development Plan.</p>
<p><a href="#">SD-C195-170 Dublin Cycling Campaign</a></p>	<p>The submission welcomes the emphasis on green infrastructure, placemaking and sustainable transport and the inclusion of the ‘10-minute city’ concept but states that the modal share targets for walking and cycling in the plan are not ambitious enough. The submission proposes that a modal share targets of 20% for walking and 15% for cycling are set, and that these are measured and published annually.</p> <p>The submission submits that apart from the modal share targets, the plan does not include measurable targets and therefore, suggests including the following target that Safe walking and cycling infrastructure to be provided for the last 0.5km to every school in the county and that progress is measured on an annual basis.</p>	<p><b>CE Response:</b></p> <p>The Travel Mode Shares supported by the Plan reflect National and Dublin County targets which have been specifically tailored to South Dublin County. Such mode share targets have been derived following consultation with the NTA and are provided as minimum mode share targets.</p> <p>The mode share targets have been informed by existing habits, and an understanding of the timescales required to deliver the type of connected active travel and public transport network required to facilitate a modal shift. These targets are based on current baseline analysis of the County and take into consideration the various settlements of South Dublin which comprise of various degrees of population density and urban/rural/Semi-Rural characteristics.</p>



	<p>The submission relates to SM1 Objective 1 and mentions that the NCPF set a target for modal share of cycling in Ireland - 10% - which indicates that we need to get to 20% modal share for cycling in Dublin. The NTA Bike Life survey (<a href="https://www.nationaltransport.ie/bike-life-2019-dublin-metropolitan-area/">https://www.nationaltransport.ie/bike-life-2019-dublin-metropolitan-area/</a>) found that 21% of adults don't currently cycle but would like to cycle if safe cycling infrastructure was provided.</p> <p>The submission also suggests that a more ambitious modal share target for walking should be set.</p>	<p>The minimum targets are set at a County level and based on the 2016 Census data. They will be considered again as part of the 2-year review of the Plan to ensure continuous development of projects in a phased manner and in line with updated Census data.</p> <p>The increase in target mode shares is based on numbers of total journeys. For example, an increase in cycling from 5% to 10% is a 100% increase in the number of journeys taken by bike out of all the journeys taken within the County throughout the 6-year Plan. Therefore, this represents a substantial shift in the number of users who would be moving towards this active travel mode option.</p> <p>In addition, the Draft Plan details under Chapter 5 Section 5.2.4 Connected Neighbourhoods (Short Distance Neighbourhoods) the 10-minute settlement concept, which is supported by the RSES.</p> <p>At the Neighbourhood level the Draft Plan aims to locate people in close proximity to their place of work, services, amenity and leisure facilities thereby reducing the need for car-based travel and cumulatively resulting in significant and measurable reductions in GHG emissions.</p> <p>This is echoed by a number key of Policy Objectives under SM1, SM2 and SM3 to support this shift away from the car.</p> <p><b>SM1 Objective 4:</b> <i>To ensure that future development is planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe and attractive street environment for pedestrians and cyclists, in accordance with RPO 5.3 of the RSES/MASP.</i></p> <p><b>SM2 Objective 2:</b> <i>To create a comprehensive and legible County-wide network of safe cycling and walking routes that link</i></p>
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		<p><i>communities to key destinations, amenities and leisure activities through implementation of the Cycle South Dublin project, the recommendations of the Sustainable Movement Studies and other permeability measures.</i></p> <p><b>SM3 Objective 4:</b> <i>To optimise accessibility to public transport, increase catchment and maximise permeability through the creation of new and upgrading of existing walking and cycling routes linking to public transport stops.</i></p> <p>Furthermore, the suggested inclusion of a target for safe walking and cycling infrastructure to be provided for the last 0.5km to every school in the county and that progress is measured on an annual basis is noted.</p> <p>The identification of such works would be a significant task and is something which would fall outside the scope of the County Development Plan. Improvement works, at or in close proximity to schools can be considered under annual Programmes such as general area maintenance Programmes or as part of the Cycle South Dublin network however, the importance of such measures is recognised and the Draft Plan indicates that pedestrian safety forms part of key consideration in the plan with SM2 Objective 5: seeking <i>“To ensure that all streets and street networks are designed in accordance with the principles, approaches and standards contained in the Design Manual for Urban Roads and Streets so that the movement of pedestrians and cyclists is prioritised within a safe and comfortable environment for a wide range of ages, abilities and journey types”</i>.</p> <p>In addition, and specially relating to school trips SM2 objective 7 seeks <i>‘To promote walking and cycling for school trips by implementing the following measures:</i></p> <p><i>Identifying school sites that are as close as possible to the communities they serve;</i></p>
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		<p><i>Ensuring that multiple access points are provided to school sites for pedestrians and cyclists;</i></p> <p><i>Ensuring that adequate and secure bicycle storage is provided within schools;</i></p> <p><i>Promoting initiatives such as the Green Schools and Schools Streets projects;</i></p> <p><i>Prioritising school routes for permeability projects and provision and enhancement of pedestrian and cycle ways; and</i></p> <p><i>Supporting the use of a range of physical measures to provide improved safety for pedestrians and cyclists at and close to schools.</i></p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>
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Walking and Cycling		
Submission No.	Submission Summary	CE response and recommendation
<p><a href="#">SD-C195-15 WORK Residents Association</a></p> <p><a href="#">SD-C195-240 Pamela Kearns</a></p>	<p>The submission considers that a safer access for cyclists is required to Tymon Park from the Osprey Road entrance, by providing an off-road cycle path along the Osprey Road to connect with the new Wellington Lane/Whitehall Road cycle path. A further submission expresses support for safer access for cyclists.</p>	<p><b>CE Response:</b></p> <p>The specific location identified is noted and has been referred to the Active Travel Team for consideration as part of any future programmes of works. Improvement works, such as the ones highlighted in this submission are too detailed for the County Development Plan but can be considered under annual programmes such as general area maintenance Programmes or as part of the Cycle South Dublin network.</p>

		<p>The provision of such works is supported by Policy and Objectives set out in Chapter 5 Quality Design and Healthy Placemaking and Chapter 7 Sustainable Transport namely;</p> <p><b>QDP5 Objective 2:</b> <i>To promote measures to improve pedestrian and cycle safety and convenience, including new or enhanced permeability links within all areas and pedestrianisation within identified centres.</i></p> <p><b>SM2 Objective 2:</b> <i>To create a comprehensive and legible County-wide network of safe cycling and walking routes that link communities to key destinations, amenities and leisure activities through implementation of the Cycle South Dublin project, the recommendations of the Sustainable Movement Studies and other permeability measures.</i></p> <p><b>SM2 Objective 4:</b> <i>To ensure that connectivity for pedestrians and cyclists is maximised and walking and cycling distances are reduced in existing built-up areas, by removing barriers to movement and providing active travel facilities in order to increase access to local shops, schools, public transport services and other amenities, while also taking account of existing patterns of anti-social behaviour and other unintended consequences of removal of such barriers.</i></p> <p><b>SM2 Objective 9:</b> <i>To work with the NTA to review the feasibility of implementing additional cycling facilities within the major urban and recreational areas of the County.</i></p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>
<p><a href="#">SD-C195-19 Knocklyon Network</a></p>	<p>The submission welcomes the move to facilitate more cycle ways, which should be separated from the motorised roadway where possible and also expresses</p>	<p><b>CE Response:</b></p>

<p><a href="#">SD-C195-145 Moyville residents Association</a></p>	<p>the need for improved and extended safe and convenient cycle access in the Ballyboden area.</p> <p>The submissions call for plans for E scooters to be included in the Draft Plan.</p> <p>A further emphasis is place on the need for pathways to be suitable for walkers with buggies, mobility chairs, zimmer frames, and walkers that are visually impaired etc, without being endangered. Whilst another submission expresses the need for improved and extended safe and convenient pedestrian access in Ballyboden area.</p>	<p>The Council supports the provision of a well-connected and safe cycle network that would encourage people of all abilities to cycle. This is reflected in the objective below</p> <p><b>SM2 Objective 2:</b> <i>To create a comprehensive and legible County-wide network of safe cycling and walking routes that link communities to key destinations, amenities and leisure activities through implementation of the Cycle South Dublin project, the recommendations of the Sustainable Movement Studies and other permeability measures.</i></p> <p>The specific location identified is noted and has been referred to the Active Travel Team for consideration as part of any future programmes of works. Improvement works, such as the ones highlighted in this submission are too detailed for the County Development Plan but can be considered under annual programmes such as general area maintenance Programmes or as part of the Cycle South Dublin network.</p> <p>The comments on micro-mobility are noted and, therefore, the inclusion of a new objective is deemed appropriate. Considering the legislation around the provision of e-s-scooters and other micro-mobility devices is being reviewed by the Government, the following is suggested:</p> <p><i>'To support micro-mobility in line with legislative/statutory requirements.'</i></p> <p>In addition, Chapter 5 Quality Design and Healthy Placemaking provides for a number of Policy Objectives under QDP4, QDP5, QDP6 and QDP7 which support design and accessible route for all users, such as:</p>
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		<p><b>QDP4 Objective 2:</b> <i>To promote a high standard of building and urban design, creating public spaces that are distinctive, safe, universally accessible and facilitate social and cultural diversity and interaction.</i></p> <p><b>QDP5 Objective 1:</b> <i>To improve the accessibility of all identified centres (see Chapter 9 table 9.2) from the surrounding catchment area through public transport provision, sustainable transport infrastructure, incorporating high quality local linkages between public transport stops, cycle parking and car park facilities and the various attractions within each identified centre (see Chapter 7 Sustainable Movement and Chapter 12 Our Neighbourhoods for further details).</i></p> <p><b>QDP7 Objective 6:</b> <i>To ensure that development provides an integrated and balanced approach to movement, healthy placemaking and streetscape design in accordance with the requirements of the Design Manual for Urban Roads and Streets, DTTAS and DEHLG (2013).</i></p> <p><b>QDP7 Objective 10:</b> <i>To promote and support the principles of universal design, ensuring that all environments are inclusive and can be used to the fullest extent possible by users regardless of age, ability or disability consistent with RPO 9.12 and 9.13 of the RSES.</i></p> <p><b>QDP7 Objective 12:</b> <i>To develop a network of pedestrian footpaths and public spaces, which includes access to public toilets, accessible outdoor seating and facilities for people with disabilities and/or mobility impairments and based on the principles of universal design.</i></p> <p><b>CE Recommendation:</b></p>
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		<p>In line with recommendation from submissions 195-19, 195-117, 195-145, 195-170, 195-210 and 195-259: to amend the Draft plan to include a new objective under SM1 Objective X: Overarching – Transport and Movement</p> <p><i>‘To support micro-mobility in line with legislative/statutory requirements.’</i></p>
<p><a href="#">SD-C195-57 David Build More Housing</a></p>	<p>The submission calls for the integration of as many cycle lanes (and other accessibility routes) as possible under the Draft Plan, prioritising walking, cycling and public transport ahead of car/van use.</p>	<p><b>CE Response:</b></p> <p>The Draft Development Plan places an emphasis on active travel modes as highlighted in Chapter 7, Section 7.4 Travel Mode Share, Section 7.5 Walking and Cycling and Section 7.6 Public Transport. As such the following Policy Objectives support provision and integration of active travel modes and public transport:</p> <p><b>SM1 Objective 1:</b> <i>To achieve and monitor a transition to more sustainable travel modes including walking, cycling and public transport over the lifetime of the County Development Plan, in line with the County mode share targets of 15% Walk; 10% Cycle; 20% Bus; 5% Rail; and 50% Private (Car/Van/HGV/Motorcycle).</i></p> <p><b>SM1 Objective 8:</b> <i>To prepare Integrated Transport Studies for urban areas within the County, as need arises, to provide a long-term plan for the movement of pedestrians, cyclists, public transport and private vehicles and to have regard to the European Commission’s Guidelines for Developing and Implementing a Sustainable Urban Mobility Plan (2nd Edition, 2019) in the preparation of such studies.</i></p> <p><b>SM2 Objective 2:</b> <i>To create a comprehensive and legible County-wide network of safe cycling and walking routes that link communities to key destinations, amenities and leisure activities through implementation of the Cycle South Dublin project, the</i></p>

		<p><i>recommendations of the Sustainable Movement Studies and other permeability measures.</i></p> <p><b>SM2 Objective 4:</b> <i>To ensure that connectivity for pedestrians and cyclists is maximised and walking and cycling distances are reduced in existing built-up areas, by removing barriers to movement and providing active travel facilities in order to</i></p> <p><i>increase access to local shops, schools, public transport services and other amenities, while also taking account of existing patterns of anti-social behaviour and other unintended consequences of removal of such barriers.</i></p> <p><b>SM2 Objective 5:</b> <i>To ensure that all streets and street networks are designed in accordance with the principles, approaches and standards contained in the Design Manual for Urban Roads and Streets so that the movement of pedestrians and cyclists is prioritised within a safe and comfortable environment for a wide range of ages, abilities and journey types.</i></p> <p><b>SM3 Objective 4:</b> <i>To optimise accessibility to public transport, increase catchment and maximise permeability through the creation of new and upgrading of existing walking and cycling routes linking to public transport stops.</i></p> <p><b>SM3 Objective 5:</b> <i>To facilitate an interlinked network that maximises the efficiency of existing services, reduces overall journey times and facilitates easy exchanges between modes and routes.</i></p> <p>In addition, the provisions set out in Chapter 5 Quality Design and Healthy Placemaking promote the delivery of connected neighbourhoods and the 10-minute settlement concept which will contribute towards the achievement of a modal shift towards away from car-based travel to more sustainable/active modes of transport</p>
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		<p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>
<p><a href="#">SD-C195-109 South Dublin Conservation Society</a></p>	<p>The submission calls for SM2 SLO2 to separate and clearly designated pedestrian and cycling paths at Stocking Lane to Hellfire Club as opposed to a shared road.</p>	<p><b>CE Response:</b></p> <p>The content of the submission is noted. The specific location identified is noted and has been referred to the Active Travel Team for consideration as part of any future programmes of works. Improvement works, such as the ones highlighted in this submission are too detailed for the County Development Plan but can be considered under annual programmes such as general area maintenance Programmes or as part of the Cycle South Dublin network.</p> <p>The delivery of this SLO will require a detailed design study in order to identify the optimum solution for pedestrian and cyclist movements in this area.</p> <p>In addition, SM2 objective 5 should be noted where it is an objective of the plan <i>“To ensure that all streets and street networks are designed in accordance with the principles, approaches and standards contained in the Design Manual for Urban Roads and Streets so that the movement of pedestrians and cyclists is prioritised within a safe and comfortable environment for a wide range of ages, abilities and journey types”</i>.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>

<p><a href="#">SD-C195-64 Saggart Village Residents' Association</a></p> <p><a href="#">SD-C195-251 Cllr Trevor Gilligan PC</a></p>	<p>It is requested that a new SLO be added to the plan to improve the safety of the road for pedestrians between Millbrook Nursing Home and Saggart Village.</p>	<p><b>CE Response:</b></p> <p>The request is noted; however, the matter of road infrastructure provision is deemed too specific for the Draft development Plan. The specific location identified is noted and has been referred to the Active Travel Team for consideration as part of any future programmes of works. Improvement works, such as the ones highlighted in this submission are too detailed for the County Development Plan but can be considered under annual programmes such as general area maintenance Programmes or as part of the Cycle South Dublin network.</p> <p>The Draft Plan, however, indicates that pedestrian safety forms part of key consideration in the plan with SM2 Objective 5: seeking <i>“To ensure that all streets and street networks are designed in accordance with the principles, approaches and standards contained in the Design Manual for Urban Roads and Streets so that the movement of pedestrians and cyclists is prioritised within a safe and comfortable environment for a wide range of ages, abilities and journey types”</i>.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>
<p><a href="#">SD-C195-64 Saggart Village Residents' Association</a></p> <p><a href="#">SD-C195-251 Cllr Trevor Gilligan PC</a></p>	<p>The submissions welcome the commitments in the Draft Plan to review cycling facilities and cycling linkages within and around Saggart as connecting the green areas from Citywest to Saggart and on to Rathcoole. Such infrastructure would be excellent for residents from the perspective of positive impacts on health as well as providing opportunities from the promotion of our rich heritage.</p>	<p><b>CE Response:</b></p> <p>The content of the submission is noted. The Draft Plan provides for the following Specific Local Objective in regard to traffic and transport in the Rathcoole, Newcastle and Saggart Areas:</p> <p><b>SM6 SLO 1:</b> <i>To investigate the need to carry out a traffic and transport study for Rathcoole, Saggart and Newcastle and the surrounding areas following the publication of the GDA Strategy</i></p>

		<p><i>review to 2042 which will clarify the context within which the road network in the area will function and to include a review of HGV movement.</i></p> <p>Such a study would include an examination of all modes of transport and cycle provision infrastructure for the specified areas.</p> <p>The Draft Plan provides under Section 7.5.2 for the detailed routes and projects of the Cycle South Dublin with the 'Now' scheme from Citywest to Garter Lane and Map 8 highlights the route for the NTA Greater Dublin Cycle Network Plan from Citywest to Saggart.</p> <p>Furthermore the Draft Plan details under Chapter 5 Section 5.2.4 Connected Neighbourhoods (Short Distance Neighbourhoods) the 10-minute settlement concept, which is supported by the RSES.</p> <p>At the Neighbourhood level the Draft Plan aims to locate people in close proximity to their place of work, services, amenity and leisure facilities thereby reducing the need for car-based travel and cumulatively resulting in significant and measurable reductions in GHG emissions.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>
<p><a href="#">SD-C195-23 Gary Tyrrell</a></p>	<p>This submission looks for an improved cycling network/infrastructure in SDCC, basing our approach on best practice from Denmark and the Netherlands.</p>	<p><b>CE Response:</b></p> <p>The Draft Plan is committed to supporting and delivering cycling network initiatives such as NTA Greater Dublin Cycle Network Plan and the Cycle South Dublin programme, as detailed in Chapter 7, Section 7.5.2. In addition, the Draft Plan comprises Policy objectives to ensure cycle networks are designed in a</p>

		<p>cohesive manner to create a usable and well-connected network of cycle lanes.</p> <p>Such provisions are set out under the following objectives:</p> <p><b>SM2 Objective 2:</b> <i>To create a comprehensive and legible County-wide network of safe cycling and walking routes that link communities to key destinations, amenities and leisure activities through implementation of the Cycle South Dublin project, the recommendations of the Sustainable Movement Studies and other permeability measures.</i></p> <p><b>SM2 Objective 8:</b> <i>To work with the NTA to acquire funding and secure full implementation of the Cycle South Dublin programme and the Sustainable Movement Studies recommendations.</i></p> <p><b>SM2 Objective 9:</b> <i>To work with the NTA to review the feasibility of implementing additional cycling facilities within the major urban and recreational areas of the County.</i></p> <p>It should be noted that such objectives were also informed by sustainable move studies which were carried out as background analysis to inform sustainable movement projects within the County. In regard to these studies, it is noted that there may be a need to clarify the context of this analysis and therefore it is considered appropriate to amend text/references to these studies in the interests of clarity.</p> <p>It is therefore considered that the following sections be amended to reflect this context:</p> <p>7.5 Walking and Cycling</p>
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		<p>From:</p> <p><i>Sustainable Movement Studies – These studies, carried out as part of the preparation of the Development Plan, involved close examination of movement within neighbourhoods with a view to identifying projects that will encourage active travel and the use of public transport;</i></p> <p>To:</p> <p><i>Sustainable Movement Studies – These <b>background</b> studies, carried out as part of the preparation of the Development Plan, involved close examination of movement within neighbourhoods with a view to identifying projects that will encourage active travel and the use of public transport;</i></p> <p>7.5.1 Sustainable Movement Studies</p> <p>From:</p> <p><i>The studies have identified a number of potential projects within the County which will be set out in a Sustainable Movement Report for the County which will accompany the Plan. Funding is available from the NTA for these types of project, and this will be investigated as a resource to facilitate the achievement of the recommended improvements.</i></p> <p>To:</p> <p><i>The studies have identified a number of potential projects within the County as <b>background</b> analysis to inform sustainable movement projects within the County. Significant funding is available from the NTA to carry out these improvements. Over time the implementation of these measures will result in more</i></p>
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		<p><i>people walking, cycling and using public transport and less people using the private car.</i></p> <p>Section 12.1</p> <p>From:</p> <p><i>The studies have identified a number of potential projects within the County which will be set out in a Sustainable Movement Report for the County which will accompany the plan. Significant funding is available from the NTA to carry out these improvements. Over time the implementation of these measures will result in more people walking, cycling and using public transport and less people using the private car.</i></p> <p>To:</p> <p><i>The studies have identified a number of potential projects within the County as <b>background</b> analysis to inform sustainable movement projects within the County. Significant funding is available from the NTA to carry out these improvements. Over time the implementation of these measures will result in more people walking, cycling and using public transport and less people using the private car.</i></p> <p>In Chapter 12 under Section 7. Sustainable Movement for each of the 7 Neighbourhoods:</p> <p>From:</p> <p><i>Sustainable Movement Studies were undertaken for each Neighbourhood Area, as described in section 11.1.</i></p>
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		<p>To:</p> <p><i>Sustainable Movement Studies as background information were undertaken for each Neighbourhood Area, as described in section 12.1.</i></p> <p><b>CE Recommendation:</b></p> <p>To amend the following sections in Chapter 7 and Chapter 12:</p> <p>7.5 Walking and Cycling</p> <p>From:</p> <p><i>Sustainable Movement Studies – These studies, carried out as part of the preparation of the Development Plan, involved close examination of movement within neighbourhoods with a view to identifying projects that will encourage active travel and the use of public transport;</i></p> <p>To:</p> <p><i>Sustainable Movement Studies – These <b>background</b> studies, carried out as part of the preparation of the Development Plan, involved close examination of movement within neighbourhoods with a view to identifying projects that will encourage active travel and the use of public transport;</i></p> <p>7.5.1 Sustainable Movement Studies</p> <p>From:</p>
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		<p><i>The studies have identified a number of potential projects within the County which will be set out in a Sustainable Movement Report for the County which will accompany the Plan. Funding is available from the NTA for these types of project, and this will be investigated as a resource to facilitate the achievement of the recommended improvements.</i></p> <p>To:</p> <p><i>The studies have identified a number of potential projects within the County as <b>background</b> analysis to inform sustainable movement projects within the County. Significant funding is available from the NTA to carry out these improvements. Over time the implementation of these measures will result in more people walking, cycling and using public transport and less people using the private car.</i></p> <p>Section 12.1</p> <p>From:</p> <p><i>The studies have identified a number of potential projects within the County which will be set out in a Sustainable Movement Report for the County which will accompany the plan. Significant funding is available from the NTA to carry out these improvements. Over time the implementation of these measures will result in more people walking, cycling and using public transport and less people using the private car.</i></p> <p>To:</p> <p><i>The studies have identified a number of potential projects within the County as <b>background</b> analysis to inform sustainable movement projects within the County. Significant funding is available from the NTA to carry out these improvements. Over</i></p>
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		<p><i>time the implementation of these measures will result in more people walking, cycling and using public transport and less people using the private car.</i></p> <p>In Chapter 12 under Section 7. Sustainable Movement for each of the 7 Neighbourhoods:</p> <p>From:</p> <p><i>Sustainable Movement Studies were undertaken for each Neighbourhood Area, as described in section 11.1.</i></p> <p>To:</p> <p><i>Sustainable Movement Studies <b>as background information</b> were undertaken for each Neighbourhood Area, as described in section 12.1.</i></p>
<p><a href="#">SD-C195-2 Colm Garvey</a></p>	<p>The submission proposes the addition of segregated cycle paths along R112 to separate BusConnects to cyclists. A Map is provided as part of the submission with details of the proposal located within this link.  <a href="https://futureofdublin.ie/templeogue3.html">https://futureofdublin.ie/templeogue3.html</a></p>	<p><b>CE Response:</b></p> <p>The NTA has undertaken public consultation on BusConnects and decisions on the design details of BusConnects lies with the NTA, having taken account of their consultation process. Cycle lanes associated with BusConnects and any other road design will be carried out and will be required to be carried out in accordance with the National Cycle Manual as set out under the following Objectives:</p> <p><b>SM2 Objective 6:</b> <i>To ensure that facilities for pedestrians and cyclists are designed in accordance with the principles, approaches and standards contained in the National Cycle</i></p>

		<p><i>Manual or any updated guidance and to promote off-road cycle infrastructure where feasible, subject to any design having regard to environmental sensitivities.</i></p> <p>Safety requirements will also be considered as per the following:</p> <p><b>SM2 Objective 5:</b> <i>To ensure that all streets and street networks are designed in accordance with the principles, approaches and standards contained in the Design Manual for Urban Roads and Streets so that the movement of pedestrians and cyclists is</i></p> <p><i>prioritised within a safe and comfortable environment for a wide range of ages, abilities and journey types.</i></p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>
<p><a href="#">SD-C195-281 Dublin Friends of the Earth</a></p>	<p>This submission looks for more cycle parking for bikes and cargo bikes both outdoors and indoors.</p>	<p>The Draft plan comprises Bicycle Parking Design/Provision standards which are set out under Section 13.8 Sustainable Movement.</p> <p>The Council note the changing needs and requirements with regards to bikes, cargo bikes and other micro-mobility modes. Therefore, all bicycle parking spaces should be designed in accordance with National Cycle Manual, NTA 2011 or as amended to incorporate new bike parking requirements.</p> <p>As part of the BusConnects network upgrades park and ride facilities have been and will be identified which will include provision for cycle parking facilities. Such facilities will be required varying parking needs.</p> <p>Given the changing nature of parking requirements It is considered reasonable to amend the text of this section in order to</p>

facilitate any subsequent changes/amendments to the NTA document such that this section would read as follows: *'All bicycle parking spaces shall be designed in accordance with the requirements of the National Cycle Manual, NTA (2011), or any superseding document.'*

The Draft Plan provides for bicycle parking standards in Chapter 13 under Table 13.24: Minimum Bicycle Parking/Storage Rates under

Within said table, a new category is to be included in order to clearly identify bicycle parking standards for court and pitches: 'Sports and Recreation' instead of court and pitches falling under the current category 'Enterprise and Employment'. The bicycle parking standard will remain as currently stated for 'Courts, Pitches' at '1 per 5 staff and 4 per pitch or court'.

From:

Enterprise and Employment	Offices	1 per 200 sqm GFA	1 per 200 sqm GFA
	Manufacturing		
	Warehousing	1 per 200 sqm	-
	Clubhouse Gymnasium	1 per 5 staff	1 per 50 sqm GFA
	Courts Pitches	1 per 5 staff	4 per pitch or court

			Golf or Pitch and Putt Courses	1 per 5 staff	-
		To:			
	Enterprise and Employment	Offices	Manufacturing	1 per 200 sqm GFA	1 per 200 sqm GFA
		Warehousing		1 per 200 sqm	-
		Clubhouse	Gymnasium	1 per 5 staff	1 per 50 sqm GFA
	Sport Facilities	Courts	Pitches	1 per 5 staff	4 per pitch or court
		Golf or Pitch and Putt Courses		1 per 5 staff	-
		<p>In addition, within Chapter 8, Policy Objective COS5 Objective 14 is to be revised to include the following mention:</p> <p>COS5 Objective 14: <i>'To ensure that public open space and associated recreational facilities are accessible by walking, cycling and public transport, as appropriate to their position within the</i></p>			

*open space hierarchy set out in Table 8.1 and include safe bicycle parking spaces at appropriate locations.'*

**CE Recommendation:**

To amend text in Section 13.8.1 Bicycle Parking/Storage Standards of Chapter 13 of the Draft Plan to read:

*'All bicycle parking spaces shall be designed in accordance with the requirements of the National Cycle Manual, NTA (2011), or any superseding document.'*

To amend Table 13.24, to include a new category for Court and Pitches: 'Sports and Recreation'. The bicycle parking standard will remain as currently stated for 'Courts, Pitches' at '1 per 5 staff and 4 per pitch or court'.

From:

Enterprise and Employment	Offices	1 per 200 sqm GFA	1 per 200 sqm GFA
	Manufacturing		
	Warehousing	1 per 200 sqm	-
	Clubhouse Gymnasium	1 per 5 staff	1 per 50 sqm GFA
	Courts Pitches	1 per 5 staff	4 per pitch or court

			Golf or Pitch and Putt Courses	1 per 5 staff	-
To:					
	Enterprise and Employment	Offices	Manufacturing	1 per 200 sqm GFA	1 per 200 sqm GFA
		Warehousing		1 per 200 sqm	-
		Clubhouse	Gymnasium	1 per 5 staff	1 per 50 sqm GFA
	Sport Facilities	Courts	Pitches	1 per 5 staff	4 per pitch or court
		Golf or Pitch and Putt Courses		1 per 5 staff	-
To amend Policy Objective COS5 Objective 14 to read as such:					

		COS5 Objective 14: <i>'To ensure that public open space and associated recreational facilities are accessible by walking, cycling and public transport, as appropriate to their position within the open space hierarchy set out in Table 8.1 and include safe bicycle parking spaces at appropriate locations.'</i>
<a href="#">SD-C195-281 Dublin Friends of the Earth</a>	This submission looks for an extension of the bike to work scheme to a 'bike for all' scheme which includes electric bikes and allows all citizens to participate in the grant.	<p><b>CE Response:</b></p> <p>The submission is noted, however, its requirements are beyond the remit of the County Development Plan, which is a planned spatial strategy for the County.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft development Plan.</p>
<a href="#">SD-C195-281 Dublin Friends of the Earth</a>	This submission highlights the need for better design and planning in and around parks for sustainable transport requirements. This can be done for example by ensuring safe and wide footpaths are provided for pedestrians and cyclists.	<p><b>CE Response:</b></p> <p>The request is noted; however, the matter of specific cycle infrastructure provision is deemed too specific for the Draft development Plan. Improvement works, such as the ones highlighted in this submission are too detailed for the County Development Plan but can be considered under annual Programmes such as general area maintenance Programmes or as part of the Cycle South Dublin network.</p> <p>However, the importance of this is recognised and the Draft Plan indicates that pedestrian safety forms part of key consideration in the plan with SM2 Objective 5: seeking <i>"To ensure that all streets and street networks are designed in accordance with the principles, approaches and standards contained in the Design Manual for Urban Roads and Streets so that the movement of pedestrians and cyclists is prioritised within a safe and</i></p>

		<p><i>comfortable environment for a wide range of ages, abilities and journey types”.</i></p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>
<p><a href="#">SD-C195-281 Dublin Friends of the Earth</a></p>	<p>This submission looks for the planting of trees/hedges along busy roads to act as carbon filters and to protect pedestrians and cyclists from air pollution.</p>	<p><b>CE Response:</b></p> <p>The Draft Plan under Chapter 7 highlights that there is significant scope for movement and transport corridors to form important links in the Council’s green infrastructure network as they provide opportunities for additional and replacement planting of native species and pollinators, which will in turn contribute to biodiversity and carbon sequestration. Therefore, Draft Plan already provides for such Objectives.</p> <p>In particular SM2 Objective 13 should be noted in this regard which seeks <i>‘To ensure that new walking and cycling routes are designed, insofar as possible, to function as links in the County’s green infrastructure network and</i></p> <p><i>that adequate replacement and additional planting of native species and pollinators is provided, and that SuDS approaches are used to deal with surface water run-off’.</i></p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft development Plan.</p>
<p><a href="#">SD-C195-105 Adele Geoghegan</a></p>	<p>The submission calls for the promotion of cycling and the provision of cycle infrastructure in Clondalkin to assist in providing alternative commuting options.</p>	<p><b>CE Response:</b></p> <p>The Draft Development Plan highlights under Chapter 7, Table 7.1 Cycle South Dublin Routes and Project. In addition, the NTA Greater Dublin Area Cycle Network Plan, as detailed in Map 5 of</p>



		<p>the Draft Plan, comprise the following cycle network proposal under Route SO5:</p> <p><i>'From Liffey Valley Shopping Centre southward Fonthill Road and Ninth Lock Road to Clondalkin Village and Tallaght (with a parallel variant SO5a along Neilstown Road and Fonthill Road west of Clondalkin Village). A northward link will extend across the River Liffey to Blanchardstown.'</i></p> <p>A number of Policy Objectives within Chapter 7 Sustainable Movement, under Policy SM2: Walking and Cycling support the provision of cycling infrastructures within the county to ensure a greater shift towards active travel modes.</p> <p>Furthermore, it should be noted within Chapter 5 under QDP14 objective 3 It is an objective of the plan to prepare a Local Area Plan for Clondalkin which will incorporate a transport movement study which will consider all transport movements within this area.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft development Plan.</p>
<p><a href="#">SD-C195-63 Kildare County Council</a></p>	<p>This submission supports NCBH9 Objective 6 in the context of Active travel and looks forward to collaborating with SDCC and Waterways Ireland to extend the Grand Canal Way Green Route from the 12th Lock to Hazelhatch.</p> <p>This submission also shows support for SM3 Objective 16 and SM3 Objective 23. It is further stated that section 7.7.2 and table 7.5 provide details of projects contained in South Dublin's six year road programme, noting proposals for the 'Western Dublin Orbital Route' and the 'Celbridge Link Road', both of which could impact on local</p>	<p><b>CE Response:</b></p> <p>The comments of the submission have been noted. South Dublin County Council commits to further engage with Kildare County Council and the required Transport Authorities on the development of the 6 Year Road Programme.</p> <p>The routes specified in the submission have been on the Development Plans of South Dublin County for a number of plan cycles and therefore, the Council will endeavour to engage with</p>

	<p>connectivity within the border area of South Dublin and Kildare and welcome further discussions on this matter.</p>	<p>KCC in advance of any works that could have a trans-boundary impact.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft development Plan.</p>
<p><a href="#">SD-C195-78 Recorder Residents Association</a></p>	<p>The submission sets out that the option to cycle to the local bus stop within the suburbs of Terenure is not possible as there is no place to park a bicycle safely when switching to bus.</p> <p>The pattern of the established housing estate refrains users from walking/cycling to bus stops. It adds that a large cohort of citizens cannot walk or cycle and are therefore using their cars.</p> <p>The submission underlines the lack of any dedicated School Bus provision.</p>	<p>The provision of park and Ride facilities within the County is supported in the Draft Plan under SM3 Objective 25.</p> <p>SM3 Objective 25: To facilitate the provision of Park and Ride facilities in appropriate locations at transport nodes and along strategic transport corridors in accordance with the NTA Strategy.</p> <p>It should be noted that the Council have secured funding from the NTA for bike parking facilities. Applications for the development of same will be open at the start of 2022. During this time any proposals to install and put in bike will be considered.</p> <p>Within Chapter 5 and under the principal theme of 'Connected Neighbourhoods' it is an objective of the plan (QDP Objective 2) to promote measures to improve pedestrian and cycle safety and convenience, including new or enhanced permeability links within all areas and pedestrianisation within identified centres.</p> <p>The specific reference to School Bus provision is noted, however the provision of school buses is beyond the remit of the Draft Plan, which is a planned spatial strategy for the County.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Development Plan.</p>

<p><a href="#">SD-C195-123 Local Link Kildare - South Dublin</a></p>	<p>The submission acknowledges the vision of the SM Chapter with regards to increasing walking and cycling and recognises the need for improved public transport provision around the Bohernabreena and Glenamsole region. Support is given to SM3 Objective 1 and 15.</p> <p>The submission also emphasises the need to prioritise the development of minimum Levels of Service for rural settlements throughout the county by supporting the development of a sustainable rural mobility plan, aligning with the NTA Connecting Ireland Plan and wishes to see SDCC act as a critical partner in developing sustainable rural mobility through its planning processes.</p> <p>The submission considers that the following measures are required:</p> <ol style="list-style-type: none"> <li>1. Provide a Framework of support and networking option to develop walking, cycling and public transport.</li> <li>2. Improve public transport options for rural settlements within the Bohernabreena and Glenamsole region.</li> <li>3. Development of a transport network within the settlement, throughout the County, the region and nationally.</li> <li>4. Ensure the provision of accessible transport for all ages, ability and location.</li> </ol>	<p><b>CE Response:</b></p> <p>The support for Chapter 7 and SM3 Objectives 1 and 15 is noted. With regards to the improvement of public transport options for rural settlements, the Draft Plan comprises the following Policy Objectives:</p> <p><b>SM3 Objective 4:</b> <i>To optimise accessibility to public transport, increase catchment and maximise permeability through the creation of new and upgrading of existing walking and cycling routes linking to public transport stops.</i></p> <p><b>SM3 Objective 15:</b> <i>To support the enhancement of the Local Link Rural Transport Programme in order to provide the rural communities of the County with access to improved bus services.</i></p> <p>With regards to developing a transport network within settlements, the County and the region, the following Policy Objectives are provided within the Draft Plan:</p> <p><b>SM3 Objective 2:</b> <i>To facilitate and secure the implementation of major public transport projects as identified within the NTA Transport Strategy for the Greater Dublin Area (2016-2035), or any superseding document, including BusConnects, the DART expansion programme along the Kildare route, the opening of the new rail station at Kishogue and the Luas to Lucan.</i></p> <p><b>SM3 Objective 4:</b> <i>To optimise accessibility to public transport, increase catchment and maximise permeability through the creation of new and upgrading of existing walking and cycling routes linking to public transport stops.</i></p>
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		<p><b>SM3 Objective 5:</b> <i>To facilitate an interlinked network that maximises the efficiency of existing services, reduces overall journey times and facilitates easy exchanges between modes and routes.</i></p> <p><b>SM3 Objective 6:</b> <i>To establish future public transport routes that will support the County's medium to long term development, including orbital routes to provide connectivity between outer suburban areas.</i></p> <p><b>SM3 Objective 11:</b> <i>To facilitate the delivery of the BusConnects Core Bus Corridors and seek additional bus corridor and orbital routes to serve the County by securing and maintaining any required route reservations and to ensure the BusConnects Corridors do not adversely affect the village life and livelihoods of any of our County Villages.</i></p> <p>The Draft Plan aims to provide for accessible environments for people of all ages, ability and location to walk and or cycle and connect to public transport infrastructures:</p> <p><b>SM2 Objective 5:</b> <i>To ensure that all streets and street networks are designed in accordance with the principles, approaches and standards contained in the Design Manual for Urban Roads and Streets so that the movement of pedestrians and cyclists is prioritised within a safe and comfortable environment for a wide range of ages, abilities and journey types.</i></p> <p>In addition, Chapter 5 provides for a number of Policy Objectives to ensure that public transport offerings are easily accessible to all under QDP7.</p> <p>It is considered that the Draft Plan provides sufficient policies and objectives to address the issues raised in the submission.</p>
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<p><a href="#">SD-C195-137 Declan Hanley</a></p>	<p>The submission encourages the provision of more cycle lanes and pedestrian walkways to contribute to exercise.</p>	<p><b>CE Response:</b></p> <p>The Development Plan contains policies and objectives which promote measures that have the potential to reduce the climate impact of transport by encouraging a shift from private motorised transport to walking, cycling and public transport. A key component in this shift is the enhancement of existing and provision of new cycle and pedestrian infrastructure. Such provisions are set out under Policy SM2 Objectives 1-15 which aim to re-balance movement priorities towards sustainable modes of travel by prioritising the development of walking and cycling facilities and encouraging a shift to active travel for people of all ages and abilities, in line with the County targets</p> <p>Of particular note in regard to cycle infrastructure, Cycle South Dublin is a Council programme of works that aims to provide a well-connected, well-designed, and safe walking and cycling network that offers people of all ages and abilities an attractive and credible alternative to using the car. It proposes a set of projects that would deliver nearly 260km of new and improved cycle lanes over the next ten years.</p> <p>In addition, Policy EDE20 Objective 1 seeks 'To support and facilitate the development of an integrated network of Greenways, Greenway Loops and Urban Greenways to encourage active travel across the County, subject to environmental considerations. Such provisions will facilitate the development of cycle networks, pedestrian connectivity, tourism opportunities, health benefits and climate mitigations during the lifetime of the Plan.</p>

		<p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>														
<p><a href="#">SD-C195-212 Jim Brogan Planning and Development Consultant</a></p>	<p>Submission looks for specific provisions to be included in the Draft CDP requiring that bicycle parking provision to be provided in secure, accessible locations close proximity to the playing pitches which benefit from passive surveillance.</p>	<p><b>CE Response:</b></p> <p>The issue raised in the submission is noted. All bicycle parking spaces should be designed in accordance with National Cycle Manual, NTA 2011 or as amended to incorporate new bike parking requirements.</p> <p>The Draft Plan provides for bicycle parking standards in Chapter 13 under Table 13.24: Minimum Bicycle Parking/Storage Rates under</p> <p>Within said table, a new category is to be included in order to clearly identify bicycle parking standards for court and pitches: <i>'Sports and Recreation'</i> instead of court and pitches falling under the current category <i>'Enterprise and Employment'</i>. The bicycle parking standard will remain as currently stated for <i>'Courts, Pitches'</i> at <i>'1 per 5 staff and 4 per pitch or court'</i>.</p> <p>From:</p> <table border="1" data-bbox="1245 1034 1951 1319"> <tr> <td data-bbox="1245 1034 1424 1214" rowspan="2">Enterprise and Employment</td> <td data-bbox="1424 1034 1601 1214">Offices</td> <td data-bbox="1601 1034 1776 1214">1 per 200 sqm GFA</td> <td data-bbox="1776 1034 1951 1214">1 per 200 sqm GFA</td> </tr> <tr> <td data-bbox="1424 1214 1601 1319">Manufacturing</td> <td data-bbox="1601 1214 1776 1319"></td> <td data-bbox="1776 1214 1951 1319"></td> </tr> <tr> <td data-bbox="1245 1214 1424 1319"></td> <td data-bbox="1424 1214 1601 1319">Warehousing</td> <td data-bbox="1601 1214 1776 1319">1 per 200 sqm</td> <td data-bbox="1776 1214 1951 1319">-</td> </tr> </table>				Enterprise and Employment	Offices	1 per 200 sqm GFA	1 per 200 sqm GFA	Manufacturing				Warehousing	1 per 200 sqm	-
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		To:					
		Enterprise and Employment	Offices	1 per 200 sqm GFA	1 per 200 sqm GFA		
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			Clubhouse Gymnasium	1 per 5 staff	1 per 50 sqm GFA		
		Sport Facilities	Courts Pitches	1 per 5 staff	4 per pitch or court		
			Golf or Pitch and Putt Courses	1 per 5 staff	-		

		<p>In addition, within Chapter 8, Policy Objective COS5 Objective 14 is to be revised to include the following mention:</p> <p>COS5 Objective 14: <i>‘To ensure that public open space and associated recreational facilities are accessible by walking, cycling and public transport, as appropriate to their position within the open space hierarchy set out in Table 8.1 and include safe bicycle parking spaces at appropriate locations.’</i></p> <p><b>CE Recommendation:</b></p> <p>As per Recommendation on submission 195-281, to amend text in Section 13.8.1 Bicycle Parking/Storage Standards of Chapter 13 of the Draft Plan to read:</p> <p><i>‘All bicycle parking spaces shall be designed in accordance with the requirements of the National Cycle Manual, NTA (2011), or any superseding document.’</i></p> <p>To amend Table 13.24, to include a new category for Court and Pitches: <i>‘Sports and Recreation’</i>. The bicycle parking standard will remain as currently stated for <i>‘Courts, Pitches’</i> at <i>‘1 per 5 staff and 4 per pitch or court’</i>.</p> <p>From:</p>			
		Enterprise and Employment	Offices Manufacturing	1 per 200 sqm GFA	1 per 200 sqm GFA



			Warehousing	1 per 200 sqm	-
			Clubhouse Gymnasium	1 per 5 staff	1 per 50 sqm GFA
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			Golf or Pitch and Putt Courses	1 per 5 staff	-	
		<p>To amend Policy Objective COS5 Objective 14 to read as such:</p> <p><i>COS5 Objective 14: 'To ensure that public open space and associated recreational facilities are accessible by walking, cycling and public transport, as appropriate to their position within the open space hierarchy set out in Table 8.1 <b>and include safe bicycle parking spaces at appropriate locations.</b>'</i></p>				
<p><a href="#">SD-C195-210 Dublin Commuter Coalition</a></p>	<p>The submission welcomes the greater focus on walking, cycling and public transport than has traditionally been the case. However, it expresses concerns over the fact that previous Development Plans have also referred to modal shift but have not delivered the infrastructural or systems changes required to implement such a change.</p> <p>It is highlighted that international transport planning best practice has reached a consensus on the responsibility of policy makers in redesigning cities to proactively disincentive use of private cars, rather than just increase attractiveness of active travel and would like to see SDCC reflect this best practice as a policy goal universally in the Development Plan.</p>	<p><b>CE Response:</b></p> <p>The content of the submission is noted. The Draft Plan provides concrete measures to increase walking and cycling, in particular under Section 7.5.2 where detailed routes and projects of the Cycle South Dublin scheme, led by the designated Active Travel Unit within the Council, are presented. As well, ongoing engagement with the NTA for the delivery of the NTA Greater Dublin Cycle Network Plan, as highlighted on accompanying maps. In addition, a number of Policies under SM2 place a strong emphasis on moving towards active travel modes.</p> <p>At the Neighbourhood level the Draft Plan aims to locate people in close proximity to their place of work, services, amenity and leisure facilities thereby reducing the need for car-based travel and cumulatively resulting in significant and measurable reductions in GHG emissions. Chapter 5 contains a number of Policies and Objectives to support such and provide for greater permeability, connectivity and inclusivity.</p>				

		<p>Finally, as highlighted within Chapter 12 Our Neighbourhoods, background studies have been carried out as part of the preparation of the Development Plan, which involved close examination of movement within neighbourhoods with a view to identifying projects that will encourage active travel and the use of public transport.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>
<p><a href="#">SD-C195-210 Dublin Commuter Coalition</a></p>	<p>The submission highlights that the Dodder greenway is progressing really well and want to see even more emphasis on off road walking/cycling routes throughout the county, as well as submitting that kissing gates should be removed along the Greenway to facilitate accessibility for all.</p>	<p><b>CE Response:</b></p> <p>The Development Plan contains policies and objectives which promote measures that have the potential to reduce the climate impact of transport by encouraging a shift from private motorised transport to walking, cycling and public transport. A key component in this shift is the enhancement of existing and provision of new cycle and pedestrian infrastructure. Such provisions are set out under Policy SM2 Objectives 1-15 which aim to re-balance movement priorities towards sustainable modes of travel by prioritising the development of walking and cycling facilities and encouraging a shift to active travel for people of all ages and abilities, in line with the County targets</p> <p>Of particular note in regard to cycle infrastructure, Cycle South Dublin is a Council programme of works that aims to provide a well-connected, well-designed, and safe walking and cycling network that offers people of all ages and abilities an attractive and credible alternative to using the car. It proposes a set of projects that would deliver nearly 260km of new and improved cycle lanes over the next ten years. Specific measures to be considered as part of the design of a particular cycle scheme</p>

		<p>would need to be considered as part of the design, delivery and operation of any cycle route.</p> <p>In addition, Policy EDE20 Objective 1 seeks 'To support and facilitate the development of an integrated network of Greenways, Greenway Loops and Urban Greenways to encourage active travel across the County, subject to environmental considerations. Such provisions will facilitate the development of cycle networks, pedestrian connectivity, tourism opportunities, health benefits and climate mitigations during the lifetime of the Plan.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft development Plan.</p>
<p><a href="#">SD-C195-210 Dublin Commuter Coalition</a></p>	<p>The submission underlines that school and activity runs are a major contributor to car traffic volumes and seeks the creation of routes that are suitable for children to cycle and walk to get to and from school and activities. In addition, the submission suggests that route development should be accompanied by appropriate training and building capacity for children and parents.</p>	<p><b>CE Response:</b></p> <p>The Draft Plan details under Chapter 5 Section 5.2.4 Connected Neighbourhoods (Short Distance Neighbourhoods) the 10-minute settlement concept, which is supported by the RSES.</p> <p>At the Neighbourhood level the Draft Plan aims to locate people in close proximity to their place of work, services, amenity and leisure facilities thereby reducing the need for car-based travel and cumulatively resulting in significant and measurable reductions in GHG emissions.</p> <p>This is emphasized by a number of key policies namely SM1, SM2 and SM3 which support this shift away from the car.</p> <p>Of particular Note SM2 Objective 7 seeks '<i>To promote walking and cycling for school trips by implementing the following measures: Identifying school sites that are as close as possible to the communities they serve; Ensuring that multiple access points</i></p>

		<p><i>are provided to school sites for pedestrians and cyclists; Ensuring that adequate and secure bicycle storage is provided within schools; à Promoting initiatives such as the Green Schools and Schools Streets projects; à Prioritising school routes for permeability projects and provision and enhancement of pedestrian and cycle ways; and à Supporting the use of a range of physical measures to provide improved safety for pedestrians and cyclists at and close to schools’.</i></p> <p><b>CE recommendation:</b></p> <p>No Change to the Draft  Development Plan.</p>
<p><a href="#">SD-C195-259 LOKRA</a></p>	<p>The submission supports the development and improvement of cycling infrastructure throughout the county and emphasises the need to capitalise on existing natural infrastructure to provide green / blue safe cycleways, particularly for children and leisure cyclists.</p> <p>The submission also supports road design that prioritises pedestrian and cyclist safety.</p>	<p><b>CE Response:</b></p> <p>The Development Plan contains policies and objectives which promote measures that have the potential to reduce the climate impact of transport by encouraging a shift from private motorised transport to walking, cycling and public transport. A key component in this shift is the enhancement of existing and provision of new cycle and pedestrian infrastructure. Such provisions are set out under Policy SM2 Objectives 1-15 which aim to re-balance movement priorities towards sustainable modes of travel by prioritising the development of walking and cycling facilities and encouraging a shift to active travel for people of all ages and abilities, in line with the County targets</p> <p>Of particular note in regard to cycle infrastructure, Cycle South Dublin is a Council programme of works that aims to provide a well-connected, well-designed, and safe walking and cycling network that offers people of all ages and abilities an attractive and credible alternative to using the car. It proposes a set of projects that would deliver nearly 260km of new and improved cycle lanes over the next ten years.</p>

		<p>In addition, Policy EDE20 Objective 1 seeks 'To support and facilitate the development of an integrated network of Greenways, Greenway Loops and Urban Greenways to encourage active travel across the County, subject to environmental considerations. Such provisions will facilitate the development of cycle networks, pedestrian connectivity, tourism opportunities, health benefits and climate mitigations during the lifetime of the Plan.</p> <p>In regard to safety the plan provides for the following objective within Chapter 5:</p> <p>QDP5 Objective 2: To promote measures to improve pedestrian and cycle safety and convenience, including new or enhanced permeability links within all areas and pedestrianisation within identified centres</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft development Plan.</p>
<p><a href="#">SD-C195-254 Deputy Emer Higgins</a></p>	<p>The submission welcomes the vision of the Draft Plan and demands that housing be provided where transport provision and social infrastructure can be delivered and for the provision of cycle ways throughout the area and the Grand Canal Greenway to Hazelhatch.</p>	<p><b>CE Response:</b></p> <p>The Development Plan contains policies and objectives which promote measures that have the potential to reduce the climate impact of transport by encouraging a shift from private motorised transport to walking, cycling and public transport. A key component in this shift is the enhancement of existing and provision of new cycle and pedestrian infrastructure. Such provisions are set out under Policy SM2 Objectives 1-15 which aim to re-balance movement priorities towards sustainable modes of travel by prioritising the development of walking and cycling facilities and encouraging a shift to active travel for people of all ages and abilities, in line with the County targets</p>

		<p>Of particular note in regard to cycle infrastructure, Cycle South Dublin is a Council programme of works that aims to provide a well-connected, well-designed, and safe walking and cycling network that offers people of all ages and abilities an attractive and credible alternative to using the car. It proposes a set of projects that would deliver nearly 260km of new and improved cycle lanes over the next ten years.</p> <p>In addition, Policy EDE20 Objective 1 seeks 'To support and facilitate the development of an integrated network of Greenways, Greenway Loops and Urban Greenways to encourage active travel across the County, subject to environmental considerations. Such provisions will facilitate the development of cycle networks, pedestrian connectivity, tourism opportunities, health benefits and climate mitigations during the lifetime of the Plan.</p> <p>It is deemed reasonable to amend SM2 Objective 15 to include the mention of '<b>cycle ways</b>' as well as greenways as such '<i>To investigate the feasibility and potential opportunities for a <b>cycle way and/or</b> greenway linking Newcastle, Rathcoole, Hazelhatch and the Grand Canal</i>'.</p> <p><b>CE Recommendation:</b></p> <p>To amend objective SM2 Objective 15 to read: '<i>To investigate the feasibility and potential opportunities for a <b>cycle way and/or</b> greenway linking Newcastle, Rathcoole, Hazelhatch and the Grand Canal</i>'.</p>
<a href="#">SD-C195-170 Dublin Cycling Campaign</a>	The submission makes the following points/requests:	<p><b>CE Response:</b></p> <p>The comments on micro-mobility are noted and, therefore, the inclusion of a new objective is deemed appropriate. Considering</p>

	<p>Journeys greater than 6km are considered to be suitable for eBikes, and eScooters.</p> <p>It is requested that Section 7.4 and other sections that refer to 'cycle lanes' be reworded to 'safe cycling infrastructure'.</p> <p>Within Section 7.5.1 there are other measures to trigger a shift towards active travel which include:</p> <ul style="list-style-type: none"> <li>● Allocation of road space from motor traffic to walking and cycling</li> <li>● Change traffic light sequences to prioritise pedestrians and cyclists</li> <li>● Removal or redesign of "kissing-gate" style barriers to make them accessible to all types of bicycles, wheelchairs, and buggies.</li> <li>● 30km/h speed limits on streets where vulnerable road users mix with motor vehicles</li> <li>● A series of "soft" measures to encourage more people to travel by bicycle and to attract marginalised groups to cycling: e.g. women, children, lower socio-economic groups, ethnic groups.</li> </ul> <p>The submission welcomes the overall policy and objectives on Walking and Cycling and requests that the target modal shares for walking and cycling be higher.</p>	<p>the legislation around the provision of e-scooters and other micro-mobility devices is being reviewed by the Government, the following objective is put forward to be included under SM1 Overarching – Transport and Movement:</p> <p><i>SM1 Objective X 'To support micro-mobility in line with legislative/statutory requirements.'</i></p> <p>Regarding point 2, the reference to Cycle Lanes and Safe Cycling Infrastructure are noted. The design of all cycling infrastructure must be carried out in accordance with best practice guidance which places an emphasis on the safety of the cyclist. SM2 Objective 2 of the Draft Plan is of particular note where it is an objective <i>'To create a comprehensive and legible County-wide network of safe cycling and walking routes that link communities to key destinations, amenities and leisure activities through implementation of the Cycle South Dublin project, the recommendations of the Sustainable Movement Studies and other permeability measures.'</i></p> <p>It is considered that such provisions ensure cycling infrastructure is delivered with safety at the forefront of the design process and therefore it is not considered necessary to amend the Plan.</p> <p>In regard to Section 7.5.1 the measures set out which trigger a shift towards active travel are noted. It is considered that the policies and objectives of the plan provide sufficient scope to facilitate such a shift. Such measures are also underpinned by Chapter 5 section 5.2.4 Connected Neighbourhoods and the provision of the 10-minute settlement concept.</p> <p>The Draft Plan mode share targets have been informed by existing habits, and an understanding of the timescales required to deliver the type of connected active travel and public transport network required to facilitate a modal shift. These targets are</p>
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		<p>based on current baseline analysis of the County and take into consideration the various settlements of South Dublin which comprise of various degrees of population density and urban/rural/Semi-Rural characteristics.</p> <p>The minimum targets are set at a County level and based on the 2016 Census data. They will be considered again as part of the 2-year review of the Plan to ensure continuous development of projects in a phased manner and in line with updated Census data.</p> <p>The increase in target mode shares is based on numbers of total journeys. For example, an increase in cycling from 5% to 10% is <del>in fact</del> a 100% increase in the number of journeys taken by bike out of all the journeys taken within the County throughout the 6-year Plan. Therefore, this represents a substantial shift in the number of users who would be moving towards this active travel mode option.</p> <p>The Draft Plan provides for a number of Policy Objectives which aim to support this shift under SM1 Overarching Transport and Movement, SM2 Walking and Cycling and SM3 Public Transport.</p> <p><b>CE Recommendation:</b></p> <p>In line with recommendation from submissions 195-19, 195-117, 195-145, 195-170, 195-210 and 195-259: to amend the Draft plan to include a new objective under SM1 Objective X: Overarching – Transport and Movement:</p> <p><i>‘To support micro-mobility in line with legislative/statutory requirements.’</i></p>
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<p><a href="#">SD-C195-170 Dublin Cycling Campaign</a></p>	<p>The submission welcomes the inclusion of Cycle South Dublin in the Draft Plan and suggests the following routes to be brought forward earlier in the programme as it provides access to many facilities and is already popular with experienced cyclists:</p> <p>- Route 19: Citywest to Rathfarnham</p> <p>The submission requests the following routes should be considered for inclusion in the Cycle South Dublin programme:</p> <p>- Clondalkin - It is recognised that Clondalkin cycling infrastructure is poor, a major effort is needed to provide cycling facilities and we hope that SDCC will think big to achieve the modal shift in Clondalkin. Suggested routes include:</p> <ul style="list-style-type: none"> <li>● A connection from Neilstown Road to the bus corridor from Liffey Valley to the City Centre. Route 7</li> <li>● A connection from the Fonthill Road North to Neilstown Road on the road between Rowlagh and St Ronans Estate.</li> <li>● A connection from Fonthill Road along the New Nangor road to the Clondalkin Bus corridor route 8</li> <li>● A connection from the Dutch Village ( Woodford) to bus corridor 8 Lucan - some cycling infrastructure in Lucan is inadequate, there are gaps such as:</li> <li>● Shackleton to outer ring road</li> </ul>	<p><b>CE Response:</b></p> <p>The content of the submission is noted and has been referred to the Active Travel/Transport Section for further consideration.</p> <p>The provisions in the Draft Plan aim to support and facilitate the delivery of Cycle South Dublin throughout the County as highlighted in Section 7.5.2 of Chapter 7.</p> <p>The Draft Plan, also provides for the following which intends to support further routes to be provided as part of Cycle South Dublin and the NTA Strategy:</p> <p><b>SM2 Objective 2:</b> <i>To create a comprehensive and legible County-wide network of safe cycling and walking routes that link communities to key destinations, amenities and leisure activities through implementation of the Cycle South Dublin project, the recommendations of the Sustainable Movement Studies and other permeability measures.</i></p> <p><b>SM2 Objective 9:</b> <i>To work with the NTA to review the feasibility of implementing additional cycling facilities within the major urban and recreational areas of the County.</i></p> <p>It is considered that the provisions set out in the Draft Plan are sufficient to support and facilitate the delivery of Cycle South Dublin routes in their current format or as amended or supplemented over the lifetime of the plan. However, as the programme of improved active travel projects is delivered there is scope to add new projects and routes.</p> <p><b>CE Recommendation:</b></p>
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	<ul style="list-style-type: none"> <li>● Shackleton to Lucan Village along Newcastle Road</li> <li>● Foxborough Estate cycling infrastructure to be finished</li> </ul> <p>Adamstown - The submission mentions that a route to Lucan Village along the Newcastle Road is needed.</p> <p>Walkinstown and Crumlin - A major orbital route which connects the large population centres and urban villages of Walkinstown, Greenhills, Perrystown and Crumlin are the roads of Cromwellsfort Road and Kimmage Road West. These roads continue north to Ballyfermot, and east to Terenure respectively. The submission states that these roads should be included in the plan for appropriate interventions to enable safe cycling. This route connects two routes planned in the NOW scheme 10 and 08 B-E, and one route in the draft LATER scheme 23.</p> <p>Rural SDCC - The submission states that the rural villages of Newcastle, Rathcoole and Brittis have no cycling infrastructure. Adding infrastructure to these areas, and connecting them into the planned urban routes, will be valuable for commuters but also open it up for leisure cycling.</p>	No Change to the Draft development Plan.
<a href="#">SD-C195-170 Dublin Cycling Campaign</a>	<p>The submission requests that the 60 schools within the County which are within 200m of the proposed Cycle South Dublin network be analysed to determine what additional measures are required to enable pupils to travel the final 200m, and indeed how school children in local communities are to access these networks safely.</p>	<p><b>CE Response:</b></p> <p>The content of the submission is noted. Such provisions will be examined on an ongoing basis as part of the delivery of the Cycle South Dublin scheme which is a separate process to the County Development Plan. The provisions of the plan aim to support and facilitate the delivery of Cycle South Dublin with the following objectives of particular note:</p>

	<p>The submission states that the Plan should include an objective to provide safe cycling links from each of these 60 schools to the Cycle South Dublin network.</p> <p>The submission welcomes the inclusion in 7.7 of “Provide a safer street environment with reduced vehicle speeds, particularly in areas where pedestrians and cyclists are likely to be more active;” as well as the school streets trial.</p> <p>The draft plan should also include an objective to implement school streets for a specific number of schools.</p> <p>With regards to SM2 Objective 7, it is submitted that the objective needs to be stronger in relation to retrofitting safe cycling and walking routes for existing schools. It should set measurable targets for the number of schools where the last 0.5km has safe walking and cycling routes. The schools also need to be linked up to the Cycle South Dublin plans. The objective could also include cycle training for parents.</p>	<p><b>SM2 Objective 8:</b> <i>To work with the NTA to acquire funding and secure full implementation of the Cycle South Dublin programme and the Sustainable Movement Studies recommendations.</i></p> <p><b>SM2 Objective 9:</b> <i>To work with the NTA to review the feasibility of implementing additional cycling facilities within the major urban and recreational areas of the County.</i></p> <p>In addition, the following objective specifically targets the issue of cycling to school:</p> <p><b>SM2 Objective 7:</b> <i>To promote walking and cycling for school trips by implementing the following measures: à Identifying school sites that are as close as possible to the communities they serve; à Ensuring that multiple access points are provided to school sites for pedestrians and cyclists; à Ensuring that adequate and secure bicycle storage is provided within schools; à Promoting initiatives such as the Green Schools and Schools Streets projects; à Prioritising school routes for permeability projects and provision and enhancement of pedestrian and cycle ways; and à Supporting the use of a range of physical measures to provide improved safety for pedestrians and cyclists at and close to schools.</i></p> <p>Furthermore, the Council have a number of school sites including within the national Safe Routes to Schools programs as well as a number of school sites included within a Council specific School Streets programme. Both programs will support the delivery of improved active travel measures across a number of schools in the coming years.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>
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<a href="#">SD-C195-225 An Cláíomh Glas</a>	<p>The submission supports the measures set out for the improvement of cycling and walking within the County particularly in regard to schools.</p>	<p>The support is noted and welcomed.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>
<a href="#">SD-C195-266 Christine Noonan</a>	<p>A submission expresses concerns that cycle lanes should not be put in place unless it is safe for all road users and pedestrians and that roads are wide enough to accommodate such cycle lanes.</p>	<p><b>CE Response:</b></p> <p>Pedestrian safety and priority is supported by the Draft Plan and the following Policy Objectives aim to ensure the design of pedestrian and cycling facilities are adequate to safely accommodate all active travel mode users.</p> <p><b>SM2 Objective 5:</b> <i>To ensure that all streets and street networks are designed in accordance with the principles, approaches and standards contained in the Design Manual for Urban Roads and Streets so that the movement of pedestrians and cyclists is prioritised within a safe and comfortable environment for a wide range of ages, abilities and journey types.</i></p> <p><b>SM2 Objective 6:</b> <i>To ensure that facilities for pedestrians and cyclists are designed in accordance with the principles, approaches and standards contained in the National Cycle Manual or any updated guidance and to promote off-road cycle infrastructure where feasible, subject to any design having regard to environmental sensitivities.</i></p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft development Plan.</p>

<p><a href="#">SD-C195-31 William Lavelle</a></p>	<p>Submission calls for safe routes to schools in the Lucan Village area from areas on both sides of the N4 in response to any efforts to increase the percentage of trips by walking and cycling within the Lucan/Palmerstown/Adamstown area.</p> <p>Recent replacement of footpaths along the Lucan Road missed a big opportunity of reimagining the Lucan Road corridor to improve safety for pedestrians and cyclists by providing new cycle infrastructure given the overall width of the corridor. The submission calls for the Development Plan to include an objective to redesign the Lucan Road corridor to enhance safety for all users, while protecting the efficiency of traffic flow.</p> <p>The submission questions the Draft Plan's proposal to improve permeability for pedestrians along the R136 (Ballyowen Road). It is considered that any proposals in this area should be justified by clear local demand and be subject to both public consultation and a democratic consent procedure under the relevant legislation.</p> <p>Any works to enhance walking and cycling routes should seek to preserve and enhance the visual amenity of the streetscape. In this regard, quality paving and surface finishes should be applied, and brash, gaudy plastic bollards and signage should be avoided.</p>	<p>The content of the submission is noted. South Dublin County Council is committed to supporting and enhancing existing and future walking and cycling Infrastructure within the county.</p> <p>The Council have a number of school sites including within the national Safe Routes to Schools programs as well as a number of school sites included within a Council specific School Streets programme. Both programs will support the delivery of improved active travel measures across a number of schools in the coming years. In addition, a number of current Cycle South Dublin Routes will also automatically plan to take in Schools to further improve cycling and walking infrastructure.</p> <p>The specific reference to improving permeability for pedestrians along the R136 at the Ballyowen Road is noted. The neighbourhood study for this area sets out such measures as a proposed solution to the identified issue of a lack of continuity of footpaths and ease of access for pedestrians. Any specific proposals to address this issue will be subject to a separate and more detailed design process.</p> <p>In regard to the preservation and enhancement of the visual amenity of the streetscape where works are proposed to enhance walking and cycling the provisions of Chapter 5 Quality Design and Placemaking should be noted in particular Section 5.2.5 Public Realm and QDP6 Objective 1 which "requires that all development proposals, whether in established areas or in new growth nodes, contribute positively to the creation of new, and the enhancement of existing public realm...and QDP7 Objective 6 which seeks <i>"To ensure that development provides an integrated and balanced approach to movement, healthy placemaking and streetscape design in accordance with the requirements of the Design Manual for Urban Roads and Streets, DTTAS and DEHLG (2013)"</i>.</p>
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<p><a href="#">SD-C195-154 Tallaght Community Council</a></p>	<p>The submission requests a new SLO be included in the plan which provides for a Cycle Lane going North South along Old Bawn Rd, previously referred to as SO5 route is completed during the lifetime of this CDP.</p>	<p><b>CE Response:</b></p> <p>The NTA Greater Dublin Area Cycle Network Plan, as detailed in Map 5 of the Draft Plan, comprises the following cycle network proposal under Route SO5:</p> <p><i>'From Liffey Valley Shopping Centre southward Fonthill Road and Ninth Lock Road to Clondalkin Village and Tallaght (with a parallel variant SO5a along Neilstown Road and Fonthill Road west of Clondalkin Village). A northward link will extend across the River Liffey to Blanchardstown.'</i></p> <p>The Council endeavours to support the NTA initiatives such as the NTA Greater Dublin Area Cycle Network Plan with the aim of increasing cycle lanes in the County in line with the provisions of Policy SM2 Walking and Cycling.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>
<p><a href="#">SD-C195-213 An Taisce</a></p>	<p>The Submission recommends the prioritisation of the following greenway and safe cycling routes.</p>	<p><b>CE Response:</b></p>

	<p>-A multiple convergence of routes from Tallaght as a hub to Dublin City Centre,</p> <p>-Clondalkin, with access to the Dublin Mountains and Blessington Reservoir greenway via Kilbride to provide an alternative to the N81;</p> <p>- Grand Canal, Clondalkin, CorKagh Park, Saggart to Rathcoole;</p> <p>- Grand Canal/Adamstown to Lucan Village.</p>	<p>The content of the submission is noted and has been referred to the Active Travel/Transport Section for further consideration.</p> <p>The provisions in the Draft Plan aim to support and facilitate the delivery of Cycle South Dublin throughout the County as highlighted in Section 7.5.2 of Chapter 7.</p> <p>The Draft Plan, however, provides for the following which intends to support further routes to be provided as part of Cycle South Dublin and the NTA Strategy:</p> <p><b>SM2 Objective 2:</b> <i>To create a comprehensive and legible County-wide network of safe cycling and walking routes that link communities to key destinations, amenities and leisure activities through implementation of the Cycle South Dublin project, the recommendations of the Sustainable Movement Studies and other permeability measures.</i></p> <p><b>SM2 Objective 9:</b> <i>To work with the NTA to review the feasibility of implementing additional cycling facilities within the major urban and recreational areas of the County.</i></p> <p>It is considered that the provisions set out in the Draft Plan are sufficient to support and facilitate the delivery of Cycle South Dublin routes in their current format or as amended or supplemented over the lifetime of the plan. However, as the programme of improved active travel projects is delivered there is scope to add new projects and routes.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>
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<p><a href="#">SD-C195-213 An Taisce</a></p>	<p>The submission considers that proposals for new road infrastructure must be assessed for alignment with the Programme for Government commitment to a 2:1 ratio of expenditure between new public transport infrastructure and new roads. Significant amounts of existing road space also needs to be reallocated for high quality segregated cycle lanes and footpaths.</p>	<p><b>CE Response:</b></p> <p>The issue raised is noted however this issue does not fall within the remit of the Development Plan.</p> <p>It should be noted however that the Plan aims to promote a shift away from car-based travel to more active modes which will require necessary infrastructure to facilitate such a modal shift. The Draft Plan includes numerous objectives throughout but in particular within Chapters 5 and 7 which seek to guide, support and facilitate such measures.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>
<p><a href="#">SD-C195-78 Recorder Residents Association</a></p> <p><a href="#">SD-C195-19 Knocklyon Network</a></p>	<p>It is stated in one submission that BusConnects does not address the issues raised in section 7.1 relating to addressing climate change and changing the way in which we move around through more sustainable modes of transport. The submission states that by maintaining a corridor system - it is simply perpetuating the current difficulty caused by long walks to buses.</p> <p>On similar theme a further submission outlines its support for the 10-15 minute community concept which should be supported by a joining up and linking of estates by pedestrian walk-throughs and open areas.</p>	<p>The proposed BusConnects Corridors are beyond the remit of the County Development Plan and are provided by the NTA under the Transport Strategy for the Greater Dublin Area 2016-2035 (which is currently being updated). South Dublin County Council seeks to support the NTA strategy in delivering outcomes of County and National benefit.</p> <p>The Draft Plan recognises the need to provide a shift in transport mode uses.</p> <p><i>“The National Climate Action Plan (2019) indicates that transport accounts for almost one fifth of Ireland’s greenhouse gas emissions (figure from 2017). In the South Dublin County area, data from the 2016 census indicates that 62% of journeys are by private transport, which are mainly car-based trips. It is therefore clear that changing the way in which we move around to more sustainable modes including walking, cycling and public transport</i></p>

		<p><i>has significant potential to help us tackle climate change by reducing emissions from transport.”</i></p> <p>The Draft Plan provides supporting objectives under policies SM1, SM2 and SM3 including the following:</p> <p><b>SM1 Objective 1:</b> <i>To achieve and monitor a transition to more sustainable travel modes including walking, cycling and public transport over the lifetime of the County Development Plan, in line with the County mode share targets of 15% Walk; 10% Cycle; 20% Bus; 5% Rail; and 50% Private (Car/Van/HGV/Motorcycle).</i></p> <p>In addition, and in regard to the 10-15min settlement/community concept the following objective should be noted.</p> <p><b>SM2 Objective 2:</b> <i>To create a comprehensive and legible County-wide network of safe cycling and walking routes that link communities to key destinations, amenities and leisure activities through implementation of the Cycle South Dublin project, the recommendations of the Sustainable Movement Studies and other permeability measures.</i></p> <p>Such provisions are also supported in Chapter 5 within section 5.2.4 Connected Neighbourhoods and under Policy QDP5.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>
<p><a href="#">SD-C195-170 Dublin Cycling Campaign</a></p>	<p>The submission welcomes the following measures to address climate impacts:</p>	<p><b>CE Response:</b></p>

	<ul style="list-style-type: none"> <li>● Creating inclusive and safe environments in which people can move through, encouraging active modes of transport and striving towards the delivery of connected neighbourhoods and the 10-minute settlement concept in line with the RSES.</li> <li>● Supporting the delivery of the Cycle South Dublin programme of work to improve cycle infrastructure in the County, attracting more users and reducing car-based journeys.</li> </ul> <p>The submission also suggests the following measures are added:</p> <ul style="list-style-type: none"> <li>● A list of key cycle routes that will be completed in the timeframe of the plan.</li> <li>● Reallocation of some existing road space to cycling, e.g. by making some roads one-way and dedicating one lane to cycling.</li> <li>● Setting a target modal share for cycling and walking to be monitored and achieved within the timeframe of the plan.</li> <li>● Emphasis on safe cycling routes to Schools, Community buildings / sporting venues, shops and large areas of employment e.g. Citywest and Grange Castle.</li> </ul>	<p>The submission is noted. Climate Action and delivering Connected Neighbourhoods are key themes throughout the Draft Plan.</p> <p>The Draft Plan is committed to supporting and delivering cycling network initiatives such as NTA Greater Dublin Cycle Network Plan and the Cycle South Dublin scheme, as detailed in Chapter 7, Section 7.5.2. Cycle South Dublin is a Council programme of works that aims to provide a well-connected, well-designed, and safe walking and cycling network that offers people of all ages and abilities an attractive and credible alternative to using the car. It proposes a set of projects that would deliver nearly 260km of new and improved cycle lanes over the next ten years. The timeframe for delivery is set out in Table 7.1 of the Draft Plan.</p> <p>The Draft Plan zoning maps indicate both the Proposed Local Cycle / Pedestrian Links and the NTA Greater Dublin Cycle Network Plan routes. In Chapter 12, the Neighbourhood maps indicate 10-minute walking bands and 10-minute cycle bands around all zoned Town/ Village/ District/ Local Centres in the County along with Existing and Improved Cycle Routes and Proposed Cycle Scheme routes.</p> <p>In addition, the Policy Objectives under SM2: Walking and Cycling aim to support the delivery of well-connected footpath and cycle lanes and, where possible, linking with the County's Green Infrastructure, as highlighted more specifically under SM2 Objective 13 - To ensure that new walking and cycling routes are designed, insofar as possible, to function as links in the County's green infrastructure network and that adequate replacement and additional planting of native species and pollinators is provided, and that SuDS approaches are used to deal with surface water run-off.</p>
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Public Transport		
Submission No.	Submission Summary	CE response and recommendation
<a href="#">SD-C195-19 Knocklyon Network</a>  <a href="#">SD-C195-266 Christine Noonan</a>	<p>The submission supports the call for a Metro from the City Centre to South West Dublin, maybe even connecting with the Red Luas in Tallaght.</p>	<p><b>CE Response:</b></p> <p>The Draft Plan under SM3 Objective 7 facilitates and support the development of suitable transport solutions in consultation with the NTA.</p> <p><i>Sm3 Objective 7: To support and encourage the NTA in investigating high-capacity public transport solutions for Dublin south-west, including examining the feasibility of Metro and/or</i></p>

		<p><i>Luas, serving areas including Ballyboden, Ballycullen/Oldcourt, Firhouse, Kimmage, Knocklyon, Rathfarnham, South Tallaght, Templeogue and Terenure.</i></p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>
<p><a href="#">SD-C195-19 Knocklyon Network</a></p>	<p>The submission calls for a bus route along the M50 to increase connectivity and alternatives to car transport.</p>	<p><b>CE Response:</b></p> <p>Bus routes are a matter for the NTA. The NTA Transport Strategy for the Greater Dublin Area 2016-2035 is currently being updated and the Council will support the outcome of the revised Strategy. The NTA's Bus Connects service improvements are also currently being rolled out across the County.</p> <p>The Draft Plan includes the following Objectives which aim to facilitate increased transport connectivity and provision within the County:</p> <p><b>SM3 Objective 2:</b> <i>To facilitate and secure the implementation of major public transport projects as identified within the NTA Transport Strategy for the Greater Dublin Area (2016-2035), or any superseding document, including BusConnects, the DART expansion programme along the Kildare route, the opening of the new rail station at Kishogue and the Luas to Lucan.</i></p> <p><b>SM3 Objective 5:</b> <i>To facilitate an interlinked network that maximises the efficiency of existing services, reduces overall journey times and facilitates easy exchanges between modes and routes.</i></p> <p><b>CE Recommendation:</b></p>

		No Change to the Draft Development Plan.
<p><a href="#">SD-C195-64 Saggart Village Residents' Association</a></p> <p><a href="#">SD-C195-251 Cllr Trevor Gilligan PC</a></p>	<p>The submissions highlight the need for additional and increased public transport infrastructure to serve the Saggart area. It is considered that this issue should be addressed in the Development Plan by way of an SLO.</p>	<p><b>CE Response:</b></p> <p>The Draft Development Plan contains a number of objectives to support increased provision of public transport within the County. The Council engage and work on an ongoing basis with various bodies and transport authorities in the delivery of such measures.</p> <p>The BusConnect infrastructure and service plans will provide improvements to the public transport network in the area of Saggart. This is already supported by the following Policy Objectives of the Draft Plan:</p> <p><b>SM3 Objective 2:</b> <i>To facilitate and secure the implementation of major public transport projects as identified within the NTA Transport Strategy for the Greater Dublin Area (2016-2035), or any superseding document, including BusConnects, the DART expansion programme along the Kildare route, the opening of the new rail station at Kishogue and the Luas to Lucan.</i></p> <p><b>SM3 Objective 11:</b> <i>To facilitate the delivery of the BusConnects Core Bus Corridors and seek additional bus corridor and orbital routes to serve the County by securing and maintaining any required route reservations and to ensure the BusConnects Corridors do not adversely affect the village life and livelihoods of any of our County Villages.</i></p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>

<a href="#">SD-C195-119 People Before Profit</a>	<p>The submission calls for greater commitment from the government to increase funding for public transport to make it more frequent and increase capacity which will increase once Covid restrictions are eased.</p>	<p><b>CE Response:</b></p> <p>The Council support the principle of funding public transport initiatives and while SDCC will continue to work with relevant transport authorities, this is a matter for central Government.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>
<a href="#">SD-C195-281 Dublin Friends of the Earth</a>	<p>This submission seeks the full electrification of the Dublin Bus fleet.</p>	<p><b>CE Response:</b></p> <p>The Council supports this, however, it is an operational matter for the NTA and bus providers which is beyond the remit of the Development Plan.</p> <p>Section 10.2.3 of Chapter 10 of the Draft Plan provides for the following to support this sentiment and Policy Objectives E34 relate to Electric Vehicles.</p> <p><b>CE recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>
<a href="#">SD-C195-63 Kildare County Council</a>	<p>This submission refers to the electrification and upgrading of the Kildare line to a high frequency DART service which will benefit the surrounding communities of South Dublin and Kildare, with support shown for the proposed project and for further collaboration in the future.</p>	<p><b>CE Response:</b></p> <p>The support of Kildare County Council is noted in regard to the proposed upgrade of the Kildare Rail Line.</p> <p>As per Section 7.6.2 of the County Draft Development Plan under the Sustainable Movement Chapter, South Dublin County Council support the NTA and Iarnród Éireann in providing for the delivery of:</p>

		<p>The implementation of the DART expansion programme will provide DART+ services as far as Hazelhatch on the Kildare Line, serving the developing Adamstown SDZ lands, the Grange Castle Business Park, the established areas of Clondalkin and the Strategic Development Zone (SDZ) lands at Clonburris where a community of 23,000 population is planned. The newly-built station at Kishogue will open during Phase 1B of the Clonburris SDZ Planning Scheme (1,001 – 2,000 residential units). The expansion programme will also provide an increased train frequency at Park West in the Naas Road area.</p> <p>In addition, section 7.4 under Travel Mode states that heavy rail services within the County are scheduled for significant upgrade and improvement including proposals for DART+ that will see increased train frequency on the Heuston to Hazelhatch line with capacity for up to 23 trains per hour in each direction with stops at Adamstown, Clonburris and Park West in the Naas Road area, along with the opening of the rail station at Kishogue in Clonburris.</p> <p>Note: relates to submission C195-208 which specifies that 23 trains per hour in each direction is to be provided, instead of 15 as previously indicated.</p> <p><b>CE Recommendation:</b></p> <p>In line with submission recommendation C195-208, To amend the text within section 7.4 Travel Mode Share to reflect the increase to <i>'23 trains per hour per direction'</i> from <i>'15 trains per hour per direction'</i> to read:</p> <p><i>'Similarly, heavy rail services within the County are scheduled for significant upgrade and improvement including proposals for</i></p>
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		<p><i>DART+ that will see increased train frequency on the Heuston to Hazelhatch line with capacity for up to <b>23 trains</b> per hour in each direction with stops at Adamstown, Clonburris and Park West in the Naas Road area, along with the opening of the rail station at Kishogue in Clonburris.'</i></p>
<p><a href="#">SD-C195-70 Sean Ward</a></p> <p><a href="#">SD-C195-242 Pamela Kearns</a></p>	<p>Two submissions highlight bus route and frequency issues along Templeogue Road, as well as Kimmage Road Lower and Wellington Lane. Concerns relating to air pollution and noise are mentioned.</p>	<p><b>CE Response:</b></p> <p>The submission, which relates to BusConnects proposals, is noted and matters relating to bus services are matters for the NTA. It should be noted the Draft Development Plan is a strategic level document that cannot review in detail specific issues along individual roads. However, the following policies support the overarching requirements associated with Public Transport provision, multi-modal linkages, and environmental considerations:</p> <p><b>SM3 Objective 2:</b> <i>To facilitate and secure the implementation of major public transport projects as identified within the NTA Transport Strategy for the Greater Dublin Area (2016-2035), or any superseding document, including BusConnects, the DART expansion programme along the Kildare route, the opening of the new rail station at Kishogue and the Luas to Lucan.</i></p> <p><b>SM3 Objective 5:</b> <i>To facilitate an interlinked network that maximises the efficiency of existing services, reduces overall journey times and facilitates easy exchanges between modes and routes.</i></p> <p><b>SM3 Objective 7:</b> <i>To support and encourage the NTA in investigating high-capacity public transport solutions for Dublin south-west, including examining the feasibility of Metro and/or Luas, serving areas including Ballyboden, Ballycullen/Oldcourt, Firhouse, Kimmage, Knocklyon, Rathfarnham, South Tallaght, Templeogue and Terenure.</i></p>

		<p><b>SM3 Objective 9:</b> <i>To ensure that all new public transport corridors are designed to enhance the County's green infrastructure network by ensuring adequate replacement and additional planting of native species and pollinators and to ensure that SuDS approaches are used to deal with surface water run-off.</i></p> <p><b>SM3 Objective 11:</b> <i>To facilitate the delivery of the BusConnects Core Bus Corridors and seek additional bus corridor and orbital routes to serve the County by securing and maintaining any required route reservations and to ensure the BusConnects Corridors do not adversely affect the village life and livelihoods of any of our County Villages.</i></p> <p><b>SM3 Objective 13:</b> <i>To support new Bus Rapid Transit (BRT) lines as a means of providing new public transport links, where rail options are demonstrated by the NTA not to be achievable over the period of the County Development Plan 2022-2028, including for the planned Metro (Metrowest) and along the Outer Ring Road and Adamstown-Citywest corridors.</i></p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>
<p><a href="#">SD-C195-208 Iarnród Éireann / Irish Rail</a></p>	<p>The submission states that the DART+ will provide increased capacity and frequency for the existing system between Dublin City Centre and the areas of Celbridge, Maynooth, Dunboyne, Greystones, and Drogheda.</p> <p>The DART+ South West Project will see an increase in train capacity along the line traversing South Dublin County.</p> <p>The current 12 trains per hour per direction will increase to 23 trains per hour per direction (i.e., maintain the existing 12 services, with an additional 11 train services provided</p>	<p><b>CE Response:</b></p> <p>The content of the submission is noted. The Council will continue to support the implementation of the full DART+ Programme, as per SM1 Objective 3 and SM3 Objective 2.</p> <p>The Draft Development Plan at present states under Section 7.4 Travel Mode Share that '<i>DART+ that will see increased train frequency on the Heuston to Hazelhatch line with capacity for up to <b>15 trains</b> per hour in each direction with stops at Adamstown, Clonburris and Park West in the Naas Road area</i>'.</p>

	<p>by DART+ South West). This will increase passenger capacity from the current peak capacity of approximately 5,000 passengers per hour per direction to approximately 20,000 passengers per hour per direction, providing additional capacity and services serving the citizens of South Dublin County.</p> <p>The submission mentions that it is essential that the Development Plan continues to support the implementation of the full DART+ Programme, as per the objectives SM1 Objective 3 and SM3 Objective 2. The extent of the DART+ Programme and the various elements are summarised in Appendix A.</p>	<p>Therefore, the Draft Development Plan will be amended to reflect the numbers stated in the submission, to include <b><i>'23 trains per hour per direction'</i></b>.</p> <p><b>CE Recommendation:</b></p> <p>To amend the text within section 7.4 Travel Mode Share to reflect the increase to '23 trains per hour per direction' from '15 trains per hour per direction' to read:</p> <p><i>'Similarly, heavy rail services within the County are scheduled for significant upgrade and improvement including proposals for DART+ that will see increased train frequency on the Heuston to Hazelhatch line with capacity for up to 23 trains per hour in each direction with stops at Adamstown, Clonburris and Park West in the Naas Road area, along with the opening of the rail station at Kishogue in Clonburris.'</i></p>
<p><a href="#">SD-C195-208 Iarnród Éireann / Irish Rail</a></p>	<p>The submission states that works are ongoing to update stations across the rail network. In addition, preliminary designs and progress planning and statutory processes for significant accessibility upgrades are being scoped to include full compliance with accessibility standards, notably the Technical Specification for Interoperability (TSI) for Persons with Reduced Mobility.</p> <p>The submission highlights progress on the planning and development of a number of new stations such as the following in SDCC:</p> <ul style="list-style-type: none"> <li>- Kishoge station on the Kildare Line, located within the Clonburris SDZ;</li> </ul>	<p><b>CE Response:</b></p> <p>The submission from Irish Rail and the infrastructure programme within SDCC is noted which include the opening of Kishogue and the delivery of the DART+ Programme. Such provisions are included in the Draft Plan. The Council will continue to support full compliance with accessibility standards.</p> <p><b>CE Recommendation:</b></p> <p>No Change to Draft Development Plan.</p>

<p><a href="#">SD-C195-210 Dublin Commuter Coalition</a></p>	<p>The submission puts forward a proposal for a Tallaght Loop Bus Route to connect many estates to schools, basketball arena, hospital, library etc as proposed in version 1 of BusConnects.</p> <p>The submission also supports the use of bus gates like in Tallaght Village, which has worked really well in making sure public transport is an excellent choice for people.</p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted. The Council are supportive of improved public transport provisions as per The Draft Plan's objectives set out in Chapter 7 under policy SM3 which aims to 'Promote a significant shift from car-based travel to public transport in line with County targets and facilitate the sustainable development of the County by supporting and guiding national agencies in delivering major improvements to the public transport network'. Such policy provision is underpinned by objectives SM3 objectives 2, 4, 5, 6, 11 and 12.</p> <p>The provision and alterations of specific bus services is a matter for the NTA.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>
<p><a href="#">SD-C195-259 LOKRA</a></p>	<p>The submission mentions the omission in the Plan of 'Park and Ride' facilities as one of the 'Key Elements' of the Bus Connects strategy, while it is stated in the Plan that 'Park and Ride provides the opportunity for modal transfer from the private car to the public transport network' and the concept of Transport Hubs is deemed essential in the connection of orbital and radial routes.</p>	<p><b>CE Response:</b></p> <p>The issue raised is noted. Table 7.4 Park and Ride Proposals does specify the proposals for Park and Ride within the County, currently at Adamstown Station, Kishogue station and Lucan.</p> <p>In addition, the Draft Development Plan provides for the following Policy Objective to support the further planning and delivery of Park and Ride in supporting multi-modal travel options:</p> <p><b>SM3 Objective 25:</b> <i>To facilitate the provision of Park and Ride facilities in appropriate locations at transport nodes and along strategic transport corridors in accordance with the NTA Strategy.</i></p>

		<p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>
<p><a href="#">SD-C195-259 LOKRA</a></p>	<p>The submission welcomes the enhancement of orbital public transport to support interconnectivity between local urban villages but requires that it takes into account POWSCAR data and community views in the assessment of service requirements. It states that interconnections are becoming increasingly important and essential to support the 15-minute city concept.</p>	<p><b>CE Response:</b></p> <p>The sentiment of the submission is supported by the DRAFT Development Plan under Section 7.6 Public Transport:</p> <p><i>To encourage a significant shift to public transport, the Council will continue to work with the NTA, the statutory authority responsible for long-term strategic transport planning in the Greater Dublin Area, to focus on the delivery of:</i></p> <p><i>Orbital public transport services linking major centres and areas of employment such as Tallaght, Clondalkin and Liffey Valley and further linking to other parts of the Greater Dublin Area;</i></p> <p>In addition, the following Policy Objective is of relevance:</p> <p><b>SM3 Objective 6:</b> <i>To establish future public transport routes that will support the County's medium to long term development, including orbital routes to provide connectivity between outer suburban areas.</i></p> <p>A number of orbital routes are also proposed which will greatly improve ease of movement within the County and to destinations beyond. These are set out in Table 7.3.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>

<p><a href="#">SD-C195-254 Deputy Emer Higgins</a></p>	<p>The submission welcomes the vision of the Draft Plan and demands that housing be provided where transport provision and social infrastructure can be delivered. As such, the submission requests that the following public transport links be provided:</p> <p>A Bus Connects strategy that delivers for commuters,</p> <p>Opening of Kishogue Train Station,</p> <p>Upgrade of the Dart to Hazelhatch,</p> <p>Extension of the LUAS to Rathcoole,</p> <p>A feeder service from Clondalkin to the Red Cow and</p> <p>Delivery of the Luas to Lucan</p>	<p><b>CE Response:</b></p> <p>The content of the submission is noted. The Draft Plan places an emphasis on connected neighbourhoods and the ten-minute settlement concept whereby community facilities and services are accessible within a 10-minute walk or cycle from home or accessible via public transport services connecting people to larger scaled settlements where such services are available.</p> <p>The BusConnects strategy falls within the remit of the NTA. South Dublin County Council support the NTA in delivering the Strategy's objectives and proposals.</p> <p>DART+ proposals will increase train frequency on the Heuston to Hazelhatch line with capacity for up to 23 trains* per hour in each direction with stops at Adamstown, Clonburris and Park West in the Naas Road area. It is also worth noting that Irish Rail intend to open the rail station at Kishogue in Clonburris as part of the Phasing Programme for Clonburris</p> <p>At present, the extension of the Luas to Rathcoole is not proposed as part of the NTA Strategy to 2035.</p> <p>While a shuttle service from Clondalkin to the Red Cow may have some merit, it is an operational matter for the NTA which would require an assessment of transport needs.</p> <p>As per the NTA Strategy 2035 (currently under review), South Dublin County Council supports the Luas to Lucan, which will provide a high-capacity link into the centre of Lucan's large residential areas to the south of the N4 national road and connecting to the city centre.</p>
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<p><a href="#">SD-C195-170 Dublin Cycling Campaign</a></p>	<p>The submission proposes that the following objectives be added to the Draft Plan:</p> <p>To provide secure, free bicycle parking at all rail stations and public transport interchanges.</p> <p>To ensure that all BusConnects routes include provision for safe cycling for people of all ages.</p> <p>Section 7.6 of the Draft Plan sets out that the council will continue to work with the NTA, the statutory authority responsible for long-term strategic transport planning in the Greater Dublin Area, to focus on the delivery of; Orbital public transport services linking major centres and areas of employment such as Tallaght, Clondalkin and Liffey</p>	<p><b>CE Response:</b></p> <p>The Council support the rationale being put forward in regard to bike parking at rail stations and suggests the following new objective to be included in Chapter 7:</p> <p>SM1 Objective X:</p> <p><i>‘To support bike parking provision at villages, centers, parks and any other area of interest, as well as near public transport nodes to support multi-modal transport options.’</i></p> <p>Regarding BusConnects, such matters fall under the remit of the NTA and would have been considered as part of the development and design stages of the overall BusConnects programme.</p>

	<p>Valley and further linking to other parts of the Greater Dublin Area;</p> <p>The submission suggests that this objective could be made stronger by including specific locations in the GDA eg James's Hospital, Vincent's Hospital, and also take account of people living in Dublin City/DLR/Fingal but working in South Dublin.</p>	<p>The Draft Plan promotes sustainable transport measures and will continue to work with and alongside the NTA in developing a 'whole journey approach' within the County.</p> <p>The proposal to include specific locations in the GDA is noted however it is considered that the wording as currently set out in the plan is appropriate however a minor amended is suggested to the wording such that the first bullet point in section 7.6 would read as follows:</p> <p><i>'Orbital public transport services linking major centres and areas of employment such as Tallaght, Clondalkin and Liffey Valley and further linking to other parts/<b>key service areas</b> of the Greater Dublin Area.</i></p> <p><b>CE Recommendation:</b></p> <p>Amend the first bullet point in section 7.6 to read as follows:</p> <p>From:</p> <p><i>Orbital public transport services linking major centres and areas of employment such as Tallaght, Clondalkin and Liffey Valley and further linking to other parts of the Greater Dublin Area;</i></p> <p>To:</p> <p><i>'Orbital public transport services linking major centres and areas of employment such as Tallaght, Clondalkin and Liffey Valley and further linking to other parts/<b>key service areas</b> of the Greater Dublin Area.</i></p> <p>To include a new objective under SM1 Objective X:</p>
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<p><a href="#">SD-C195-279 Ballyboden Tidy Towns Group</a></p>	<p>The submission requests that the deficiency in public transport serving the Ballyboden area is acknowledged in the Draft Plan and states that significant public transport improvement is required as an objective in the Draft Plan prior to any large-scale residential development being permitted in the Ballyboden area going forward.</p>	<p><b>CE Response:</b></p> <p>The content of the submission is noted. In regard to future public transport provision in the Ballyboden area SM3 Objective 7 seeks <i>'To support and encourage the NTA in investigating high-capacity public transport solutions for Dublin south-west, including examining the feasibility of Metro and/or Luas, serving areas including Ballyboden, Ballycullen/Oldcourt, Firhouse, Kimmage, Knocklyon, Rathfarnham, South Tallaght, Templeogue and Terenure'</i>.</p> <p>In addition, Chapter 5 of the plan under section 5.2.4 identifies that a key element of healthy placemaking is the need to ensure alternatives to the car in the design of streets and public spaces and to prioritise and promote cycling and walking as active transport modes. The provision of high-quality public transport, greenways and cycleways enhances an area, contributing to more attractive places, creating opportunities for a healthier lifestyle through physical activity and reducing the negative consequences of car-based commuting.</p> <p>Under policy QD5: Connected Neighbourhoods the plan promotes short distance neighbourhoods and strives towards the achievement of 10-minute settlements over the lifetime of the Plan, promoting a more compact development form, sustainable movement, and ease of access to services, community facilities, jobs and amenities.</p> <p><b>CE Response</b></p> <p>No Change to the Draft Development Plan.</p>

<p><a href="#">SD-C195-133 CAIRN Plc</a></p>	<p>The wider Cairn PLC submission has made reference to a number of areas of the overall plan. With specific reference to Chapter 7, the submission sets out its support for a number of the objectives under policy SM3 Public Transport General and SM4 The Strategic Road Network.</p> <p>The submission supports the commentary in Chapter 7 which recognises the '10-minute neighbourhood concept' and promotes the reduction in private car-based travel from 62% currently to 50% over the course of the Plan period.</p> <p>The submission supports the initiatives set out Section 7.5 which will have a direct positive impact on walking and cycling in order to reduce journeys made by private car particularly those under 6km.</p>	<p><b>CE Response:</b></p> <p>It is noted that the submission generally supports the travel mode shares as provided under of Chapter 7 and the associated Policy Objectives, as well as the 10 min settlement Concept as set out in Chapter 5.</p> <p><b>CE Recommendation</b></p> <p>No Change to the Draft Development Plan.</p>
<p><a href="#">SD-C195-208 Iarnród Éireann / Irish Rail</a></p>	<p>The submission highlights Iarnród Éireann's ambitions for the lifetime of the Pan, which includes better connectivity and integration for South Dublin to do business and live in, as well as strengthening the network at a regional and national level to ensure more sustainable movement patterns.</p> <p>The submission sets out that rail improvement schemes will benefit the area, naming the South and West lines, and potential future areas for rail development to cater for a large volume of people, in line with the NTA Transport Strategy. As part of the DART+ South West Project, an increase in train capacity along the line traversing South Dublin County from a current 12 trains per hour per direction will increase to 23 trains per hour per direction</p>	<p>The submission from Irish Rail is noted and welcomed. The Draft plan provides for a number of policies and objectives which are consistent with and support more sustainable movement patterns within the County including;</p> <p>SM1 Objective 3: To support the delivery of key sustainable transport projects including DART and Luas expansion programmes, BusConnects and the Greater Dublin Metropolitan Cycle Network in accordance with RPO 5.2 of the RSES/MASP.</p> <p>SM1 Objective 4: To ensure that future development is planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating</p>

	<p>The submission underlines measures for the Development Plan to take into consideration, including prioritising public transport and active travel modes, supporting the expansion of high-capacity transport, promoting development in areas that can be serviced by such and supporting new rail lines and stations with park and ride where possible.</p> <p>Specific programmes comprise further DART network extensions and enhancements as per the NTA Transport Strategy, as well as further extending electrification of the Kildare Line and the Maynooth line.</p> <p>The submission also supports objective CS5 Objective 1: “To focus high intensity employment generating uses around high-capacity public transport nodes” and indicates how critical it is to sustainably support the projected employment growth for the County.</p>	<p>a safe and attractive street environment for pedestrians and cyclists, in accordance with RPO 5.3 of the RSES/MASP.</p> <p>Furthermore, it should be noted that there are several strategic development areas within the County where higher density and more compact development is planned. Such areas will facilitate sustainable travel in growth areas, in line with planned improvements to public transport and walking and cycling infrastructure. Section 7.6 of Chapter 7 sets out a number of Public Transport aims during the lifetime of the Plan and includes a number of objectives under Policy SM3 supporting the delivery of such infrastructure.</p> <p>Policy SM3: Public Transport – General</p> <p>Promote a significant shift from car-based travel to public transport in line with County targets and facilitate the sustainable development of the County by supporting and guiding national agencies in delivering major improvements to the public transport network.</p> <p>Chapter 7 of the Draft Plan also comprises under Section 7.6.2 specific details and objectives in regard to Rail Infrastructure which supporting the delivery of rail services within South Dublin and beyond, with an emphasis on integrated multi-modal transport solutions including park and ride facilities.</p> <p>The submissions support for Policy objective CS5 Objective 1 is noted and welcomed.</p> <p>CE Recommendation:</p> <p>No Change to the Draft Development Plan.</p>
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<p><a href="#">SD-C195-11 Proinsias Mac Fhlannchadha</a></p>	<p>The submission raises concerns regarding the lack of an intercity train stop to serve South Dublin's population and requests that SDCC amend objective SM3 Objective 22 to remove a specific reference to an inter county rail service stopping at Kishogue station given that it is considered to be a poor location for intermodal interchange. The submission states that Parkwest or the new proposed station at Kylemore would make for a better location for an intercity stop given the re-development potential of the area, accessibility, and existing population base.</p> <p>The submission also requests that as part of policy SM3 Objective 6 &amp; Objective 7, that consideration should be given to investigating the option of:</p> <p>(1) an extension of the proposed Dart + South West route from the Kildare line to a spur to Newcastle/ Rathcoole/ Saggart and the provision of stations at Grange Castle and associated park and ride facilities at the M7 interchange (Junction 4), subject to engagement with Irish Rail, TII, NTA.</p> <p>(2) an inland rail freight terminal at Newcastle to facilitate the movement of goods to this station from Dublin Port and to act as a hub for container drop off for trucks utilising the M7 corridor, subject to engagement with Irish Rail, Dublin Port, TII. This would greatly add to the attractiveness of the area as an industrial hub given the location of prominent multinationals in the area.</p>	<p><b>CE Response:</b></p> <p>The comments raised in regard to SM3 Objective 22 are also noted. This objective seeks 'To investigate the option of an inter-county rail service stopping at Kishogue station which would provide access to new employment space at Clonburris and give direct access to the Grange Castle Business Park'. The inclusion of this objective is considered reasonable given the future development of the Clonburris SDZ and the future expansion of Grangecastle Business Park. Such services if deemed feasible would be in addition to the transport measures required within the Naas Road/City Edge area.</p> <p>The Council is working with the NTA in the preparation of a planning framework for the City Edge project, which covers the lands around Naas Road and Ballymount within South Dublin. This framework will seek to ensure there is adequate connectivity to Public Transport, including to existing and new LUAS services, the proposed upgraded DART+ Southwest services and improved Bus service provision to serve the significant increased demand that will result from the redevelopment of this area.</p> <p>The proposals put forward in regard to SM3 Objective 6 and 7 are also noted. Such proposals are a matter for the NTA who have recently placed the Draft Transport Strategy for the Greater Dublin Area on public display. The Council will endeavour to support the delivery of their planned objectives and proposals as part of the existing and future strategy. The Councils will also liaise and engage with all other relevant transport providers.</p> <p>The Draft Plan supports such measures through Policy SM3 Objective 2 in the Draft Plan:</p> <p>'To facilitate and secure the implementation of major public transport projects as identified within the NTA Transport Strategy</p>
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		<p>for the Greater Dublin Area (2016-2035), or any superseding document, including BusConnects, the DART expansion programme along the Kildare route, the opening of the new rail station at Kishogue and the Luas to Lucan.'</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>
<p><a href="#">SD-C195-11 Proinsias Mac Fhlannchadha</a></p> <p><a href="#">SD-C195-2 Colm Garvey</a></p>	<p>The submissions support the proposed new "S5" orbital bus route along the R112 (Walkinstown Avenue-Dundrum) to be added to the New Dublin Bus Area Network as part of the BusConnects Network Redesign. It suggests that this bus route could extend to Kylemore (for Luas access) and terminate at Parkwest (for potential Commuter train/ Dart + Access). This would expand the potential users of this service whilst also promoting a modal interchange depending on the journey.</p> <p>One submission requests for SDCC to engage with BusConnects for the establishment of such a route as part of this development plan as per objectives SM3 Objective 4, SM3 Objective 5, SM3 Objective 6.</p> <p>The submissions support the provision of additional bus routes along the R112 to improve access to neighbouring suburbs, decrease traffic, noise level and air quality which is more sustainable than car-based travel.</p>	<p><b>CE Response:</b></p> <p>The content of the submission is noted. The BusConnects strategy falls within the remit of the NTA. South Dublin County Council will continue to work alongside and support the NTA in the delivery and roll out of the BusConnects network and services. The optimisation of the bus network is supported in the Draft Plan under:</p> <p>SM3 Objective 4: To optimise accessibility to public transport, increase catchment and maximise permeability through the creation of new and upgrading of existing walking and cycling routes linking to public transport stops.</p> <p>SM3 Objective 5: To facilitate an interlinked network that maximises the efficiency of existing services, reduces overall journey times and facilitates easy exchanges between modes and routes.</p> <p>SM3 Objective 6: To establish future public transport routes that will support the County's medium to long term development, including orbital routes to provide connectivity between outer suburban areas.</p>

		<p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>
<p><a href="#">SD-C195-22 - St Philomena's Parish, Palmerstown</a></p> <p><a href="#">SD-C195-29 St Philomena's Parish, Palmerstown</a></p>	<p>This submission is made by St Philomena's Parish in Palmerstown, Dublin 20 and relates to the proposed Bus Connects Plan; alterations to current bus routes, proposed cycle lanes and adjusting exits from Palmerstown village and potential impacts on the most vulnerable in the area.</p> <p>The submission highlights that rerouting the No. 18 Bus is a concern for local residents, senior citizens, the connectivity of Palmerstown Village and the greater use of public transport.</p>	<p><b>CE Response:</b></p> <p>As part of the BusConnects plans, the NTA have undertaken public consultation on their proposals. Decisions on the final routing of BusConnects lies with the NTA, having taken account of their consultation process.</p> <p>The Planning Authority will continue to liaise with the NTA as supported in SM1 Objective 7 which reads:</p> <p>'To engage with relevant agencies including the National Transport Authority (NTA) and Transport Infrastructure Ireland (TII) in relation to strategic and local transportation issues including delivery of transport projects and to encourage consultation with local communities.'</p> <p>In addition to the above the Draft Plan aims to safeguard the permeability of the County in order to provide ease of access to public transport and movement to all under objectives:</p> <p><b>SM3 Objective 4:</b> <i>To optimise accessibility to public transport, increase catchment and maximise permeability through the creation of new and upgrading of existing walking and cycling routes linking to public transport stops.</i></p> <p><b>SM3 Objective 18:</b> <i>To liaise with bus service providers where new bus stop infrastructure is proposed in order to ensure facilities such as shelters and bins are included, where appropriate.</i></p>

		<p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>
<p>A number of submissions were received relating to public transport with an emphasis on the provision of Metro South West. Such submissions have been taken as a collective group and are addressed under the headings of:</p> <ul style="list-style-type: none"> <li>• Public Transport: Public transport Metro South West, Public Transport BusConnects; and</li> <li>• Walking and Cycling: Cycle Lane Trials.</li> </ul>		
<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE Response and Recommendation</b>
<a href="#">SD-C195-70 - Sean Ward</a>  <a href="#">SD-C195-78 - Recorder Residents Association</a>  <a href="#">SD-C195-82 - Metro South West Group</a>  <a href="#">SD-C195-145 - Moyville residents Association</a>  <a href="#">SD-C195-146 - WORK Residents Association</a>  <a href="#">SD-C195-221 - Butterfield District Residents' Association</a>	<p><u>Public Transport – Metro South West:</u></p> <p>Several submissions state that the South West Dublin area is characterised by a lack of high-capacity public transport links and narrow roads. The submissions highlight that BusConnects alone does not offer sufficient capacity to meet population growth and that a bus only solution is not enough to cater for the area.</p> <p>A number of submissions highlight the deficiency in public transport serving the Ballyboden area and the need for significant improvements. A number of submissions propose the following amendments:</p> <p>SM1 Objective 2: To ensure consistency with the NTA's Transport Strategy for the Greater Dublin Area (2016-2035) and any superseding document, as required by RPO 8.4 of the RSES, while preserving the option of continuing MetroLink from St Stephens Green to South</p>	<p><b>CE Response:</b></p> <p>The Council note the comments made in support of Metro South West, with a preference for the continuation of the MetroLink proposal. The Council will continue to liaise and engage with the NTA and other Public Transport Authorities to support the delivery of appropriate Public Transport solutions for the Dublin South West area.</p> <p>The Draft County Development Plan provides for the following Objectives under policy SM3:</p> <p><b>SM3 Objective 7:</b> <i>To support and encourage the NTA in investigating high-capacity public transport solutions for Dublin south-west, including examining the feasibility of Metro and/or Luas, serving areas including Ballyboden, Ballycullen/Oldcourt, Firhouse, Kimmage, Knocklyon, Rathfarnham, South Tallaght, Templeogue and Terenure.</i></p>

<p><a href="#">SD-C195-241 - Pamela Kearns</a></p> <p><a href="#">SD-C195-242 - Pamela Kearns</a></p> <p><a href="#">SD-C195-243 - Pamela Kearns</a></p> <p><a href="#">SD-C195-259 LOKRA</a></p> <p><a href="#">SD-C195-221 Butterfield District Residents' Association</a></p>	<p>West Dublin, pending the conclusion of a feasibility study of this option.</p> <p>SM3 Objective 7: To support and encourage the NTA in investigating the continuation of MetroLink from St Stephens Green to South West Dublin, including the feasibility of serving the areas of Ballyboden, Ballycullen/Oldcourt, Firhouse, Kimmage, Knocklyon, Rathfarnham, South Tallaght, Templeogue and Terenure.</p> <p>The GDA Strategy is under review including the feasibility of continuing MetroLink to South West Dublin. If proven to be feasible and included in the GDA Transport Strategy, the Council would support the improved public transport benefits it would bring.</p> <p>Submissions noted that many of the new orbital routes identified as part of BusConnects are existing bus routes which will not see an increase in efficiency as it us argued that buses alone will not be sufficient to fulfil the public transport needs of a growing South West Dublin.</p> <p>Overall, the submissions support the delivery of MetroLink to Dublin South West and suggest the following amended wording:</p> <p>SM1 Objective 3: To support the delivery of key sustainable transport projects including DART, MetroLink and Luas expansion programmes, BusConnects and the Greater Dublin Metropolitan Cycle Network in accordance with RPO 5.2 of the RSES/MASP.</p>	<p>Policy Objective SM3 Objective 7 does not limit the metro route options or impede the continuation of the St. Stephens Green route and/or other public transport options. The provisions in the plan support and encourage the NTA in investigating the most optimum transport solutions for the Dublin south-west area.</p> <p>The Council also note that Section 7.6 'Public Transport' of Chapter 7 that the current NTA Transport Strategy for the Greater Dublin Area 2016-2035 is being updated with the Draft Strategy currently at public consultation. The provisions set out in the plan aim to optimise public transport solutions which facilitate a transition away from car-based travel. South Dublin County Council will input into this strategy and will work with the NTA in order to identify high-capacity public transport solutions for the entire County.</p> <p>The 5% rail target is County wide, and whilst some area might already benefit from rail infrastructure, it is policy to ensure further rail infrastructure is considered, where feasible, else other high-capacity public transport options will be investigated.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>
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	<p>the submission noted that the mode share target for Bus and Rail is not achievable due to the lack of sufficient rail infrastructure, in referring to Policy SM3 Objective 1.</p> <p>The submissions also suggest additional wording to SM3 Objective 2: To facilitate and secure the implementation of major public transport projects as identified within the NTA Transport Strategy for the Greater Dublin Area (2016-2035), or any superseding document, including BusConnects, the DART expansion programme along the Kildare route, the opening of the new rail station at Kishogue and the Luas to Lucan” and ‘the continuation of MetroLink’.</p> <p>The submissions also express support for the aims and objectives identified in the extensive analysis carried out by the Metro South West Group and the provisions set out under SM3 Objective 7.</p>	
<p><a href="#">SD-C195-78 - Recorder Residents Association</a></p> <p><a href="#">SD-C195-242 - Pamela Kearns</a></p>	<p><u>Public Transport – BusConnects:</u></p> <p>A number of submissions support the vision of Chapter 7 in moving towards more sustainable transport patterns but question the viability and implementation of the objectives on an older urban fabric that is car centric.</p> <p>A table is also provided in the submission to show that buses alone will not be sufficient to fulfil the public transport needs of the growing South West, which it is stated would lead to on-going overuse of cars as the only mode of transport after cycling. The submissions state that BusConnects does not address the issues raised in section 7.1 of the Draft Plan (Sustainable Movement and Climate Action) and state that by maintaining a corridor system - it is simply perpetuating the current difficulty</p>	<p><b>CE Response:</b></p> <p>The Public Transportation needs identified in the submission for the Dublin South West area are noted. The Draft County Development Plan provides for the following area-specific Policy Objective:</p> <p><b>SM3 Objective 7:</b> <i>To support and encourage the NTA in investigating high-capacity public transport solutions for Dublin south-west, including examining the feasibility of Metro and/or Luas, serving areas including Ballyboden, Ballycullen/Oldcourt, Firhouse, Kimmage, Knocklyon, Rathfarnham, South Tallaght, Templeogue and Terenure.</i></p> <p>In addition, the Draft Development Plan provides for other Policies and objectives to support the greater shift towards more</p>

	<p>caused by long walks to buses and lack of infrastructure to park bicycles before getting onto a bus.</p> <p>In addition, the submissions provide a map highlighting locations of Dart Southbound to Bray/Greystone along the coast and Red and Green Luas lines to illustrate that DART proposals would not serve the Whitehall area and, therefore, alternative transport options should be provided.</p> <p>The submission also included an Appendix providing elements from a previous submission on the County development Plan 2016-2022, As part of this submission, is highlighted the fact that Buses have not improved the situation in the area and that the BusConnects Plan would not address the transportation issues alone, resulting in the need to use the car.</p> <p>In addition, the submission outlines of the Lack of Bus Service to Whitehall Road and its surrounding areas including large portions of Rockfield, Muckcross, Hillsbrook and Priory/Manor Estates.</p>	<p>sustainable commuting options for Dublin South West and the whole of the County:</p> <p><b>SM3 Objective 1:</b> <i>To achieve and monitor a transition to the County mode share targets of 20% Bus and 5% Rail.</i></p> <p><b>SM3 Objective 2:</b> <i>To facilitate and secure the implementation of major public transport projects as identified within the NTA Transport Strategy for the Greater Dublin Area (2016-2035), or any superseding document, including BusConnects, the DART expansion programme along the Kildare route, the opening of the new rail station at Kishogue and the Luas to Lucan.</i></p> <p><b>SM3 Objective 3:</b> <i>To ensure that future development is planned in such a manner as to facilitate a significant shift to public transport use through pursuing compact growth policies, consolidating development around existing and planned public transport routes and interchanges, and maximising access to existing and planned public transport services throughout the network.</i></p> <p><b>SM3 Objective 5:</b> <i>To facilitate an interlinked network that maximises the efficiency of existing services, reduces overall journey times and facilitates easy exchanges between modes and routes.</i></p> <p><b>SM3 Objective 6:</b> <i>To establish future public transport routes that will support the County's medium to long term development, including orbital routes to provide connectivity between outer suburban areas.</i></p> <p>Furthermore, the provisions of the Draft Plan aim to facilitate a shift to public transport usage throughout the County through:</p>
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<p><a href="#">SD-C195-78 - Recorder Residents Association</a></p> <p><a href="#">SD-C195-242 - Pamela Kearns</a></p>	<p><u>Walking and Cycling – Cycle Lane Trials:</u></p> <p>Appendix 2 to the above submissions outline concerns with regards to the Cycle Lane Trial ‘Spawell to: <b>Templeville Road Roundabout</b>’.</p> <p>Several concerns are raised with regards the road width for cars, bus and cyclist movements and emergency vehicle movements.</p>	<p><b>CE Response:</b></p> <p>The Council welcome the comments made on the Cycle Lane Trial along Wellington Lane. The issues outlined are noted and welcomed and will contribute towards the achievement of the Draft Plans commitment to <i>achieving and monitoring a transition to the County mode share targets of 15% Walk and 10% Cycle</i>, as per Policy Objective SM2 Objective 1. These comments have been passed to the team managing those works.</p> <p>The Council are currently progressing a permanent design for this scheme and public consultation on this permanent proposal will commence in due course. Specific comments regarding the</p>

	<p>The submissions put forward a number of solutions which include:</p> <ul style="list-style-type: none"> <li>- Use of the existing grass verge space for cyclists</li> <li>- And re-instating the road width</li> </ul> <p><b>Roundabouts at Whitehall Road/Templeville and Greentrees:</b></p> <p>A number of issues are raised in regard to the size of the roundabout, the visual space, cyclists and pedestrian movements.</p> <p>The submissions put forward a number of solutions which include:</p> <ul style="list-style-type: none"> <li>- Roundabout to be moved further south to facilitate a larger roundabout</li> <li>- Greater distances between entrances</li> <li>- Road surfacing and colouring to improve legibility</li> <li>- Movement of pedestrian crossings</li> <li>- New flashing signals</li> <li>- No traffic lights</li> </ul>	<p>design of that permanent scheme should be made to the Council as part of the public consultation on the permanent scheme.</p> <p>This overarching objective is underpinned by a number of further objectives namely:</p> <p><b>SM2 Objective 2:</b> <i>To create a comprehensive and legible County-wide network of safe cycling and walking routes that link communities to key destinations, amenities and leisure activities through implementation of the Cycle South Dublin project, the recommendations of the Sustainable Movement Studies and other permeability measures.</i></p> <p><b>SM2 Objective 5:</b> <i>To ensure that all streets and street networks are designed in accordance with the principles, approaches and standards contained in the Design Manual for Urban Roads and Streets so that the movement of pedestrians and cyclists is prioritised within a safe and comfortable environment for a wide range of ages, abilities and journey types.</i></p> <p><b>SM2 Objective 6:</b> <i>To ensure that facilities for pedestrians and cyclists are designed in accordance with the principles, approaches and standards contained in the National Cycle Manual or any updated guidance and to promote off-road cycle infrastructure where feasible, subject to any design having regard to environmental sensitivities.</i></p> <p><b>SM2 Objective 8:</b> <i>To work with the NTA to acquire funding and secure full implementation of the Cycle South Dublin programme and the Sustainable Movement Studies recommendations.</i></p> <p><b>SM2 Objective 9:</b> <i>To work with the NTA to review the feasibility of implementing additional cycling facilities within the major urban and recreational areas of the County.</i></p> <p><i>In line with the above objectives South Dublin County Council and the Draft plan will continue to implement measures which</i></p>
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		<p><i>facilitate a transition away from car based travel to more sustainable transport modes.</i></p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>
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Road Network		
Submission No.	Submission Summary	CE response and recommendation
<a href="#">SD-C195-19 Knocklyon Network</a>	The submission forms part of a wider submission on the overall plan and calls for another bridge across the Dodder or another exit on the M50 between Knocklyon and Dundrum in order to <del>and</del> address the traffic issues and lack of public transport in the Knocklyon/Firhouse area.	<p><b>CE Response:</b></p> <p>The issue raised is noted. In regard to Transport improvements within this neighbourhood area the Draft Plan through objective SM3 Objective 7 seeks ‘to support and encourage the NTA in investigating high-capacity public transport solutions for Dublin south-west, including examining the feasibility of Metro and/or Luas, serving areas including Ballyboden, Ballycullen/Oldcourt, Firhouse, Kimmage, Knocklyon, Rathfarnham, South Tallaght, Templeogue and Terenure.</p> <p>The matter of an additional exit onto the M50 falls outside the remit of the plan would be a matter for Transport Infrastructure Ireland.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>

<p><a href="#">SD-C195-64 Saggart Village Residents' Association</a></p> <p><a href="#">SD-C195-251 Cllr Trevor Gilligan PC</a></p>	<p>The submission strongly advocates for the Western Dublin Orbital Route New Road from the N81 to the Leixlip Interchange as it is considered that the existing road infrastructure is not suitable for the existing and planned level of housing for Saggart and surrounding areas.</p>	<p><b>CE Response:</b></p> <p>The Draft Plan provides under Table 7.5 '6 Year Road Programme' for the Western Dublin Orbital Route - New road from N81 to the Leixlip Interchange.</p> <p>The need for this route, further connections and possible alternative routes will be determined through the review of the NTA's GDA Strategy and in consultation with Transport Infrastructure Ireland and relevant local authorities.</p> <p>It should be noted that the submission from the NTA has requested amendments to wording set out in Table 7.5 relating to the Description and function of the Western Orbital Route as follows:</p> <p>From:</p> <p>Description: New Road from N81 to the Leixlip Interchange</p> <p>Function: New Road from N81 to the Link between the N81, N7 and the N4 with a route Leixlip Interchange by-pass function around Rathcoole and Saggart. The need for this route, further connections and possible alternative routes will be determined through the review of the NTA's GDA Strategy and in consultation with TII and relevant local authorities. In any such route a primary objective of South Dublin County Council shall be to protect the scenic Liffey Valley parklands, and amenities at Lucan Demesne and St Catherine's Park and Lucan Village and no proposals to continue a road over these lands will be considered.</p> <p>To:</p>
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		<p>Description - New road from the N7 to the N4 with a potential extension to the N81</p> <p>Function:</p> <p>New Road to link between the N7 and the N4 Leixlip Interchange with a route by-pass function around Rathcoole and Saggart and the potential for a further extension of this route from the N7 to the N81. The function of this route would be to provide resilience to the M50 in particular between the N7 and N4 and further connections and possible alternative routes will be determined through the review of the NTA's GDA Strategy and in consultation with TII and relevant local authorities.</p> <p>In any such route a primary objective of South Dublin County Council shall be to protect environmentally sensitive areas including the scenic Liffey Valley parklands, and amenities at Lucan Demesne and St Catherine's Park and Lucan Village and no proposals to continue a road over these lands will be considered.</p> <p><b>CE Recommendation:</b></p> <p>Amend Table 7.5 and the Description and function of the Western Orbital Route as follows:</p> <p>From:</p> <p>Description: New Road from N81 to the Leixlip Interchange</p> <p>Function: New Road from N81 to the Link between the N81, N7 and the N4 with a route Leixlip Interchange by-pass function around Rathcoole and Saggart. The need for this route, further connections and possible alternative routes will be determined</p>
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		<p>through the review of the NTA's GDA Strategy and in consultation with TII and relevant local authorities. In any such route a primary objective of South Dublin County Council shall be to protect the scenic Liffey Valley parklands, and amenities at Lucan Demesne and St Catherine's Park and Lucan Village and no proposals to continue a road over these lands will be considered.</p> <p>To:</p> <p><i>Description - New road from the N7 to the N4 with a potential extension to the N81.</i></p> <p>Function:</p> <p>New Road to link between the N7 and the N4 Leixlip Interchange with a route by-pass function around Rathcoole and Saggart and the potential for a further extension of this route from the N7 to the N81. The function of this route would be to provide resilience to the M50 in particular between the N7 and N4 and further connections and possible alternative routes will be determined through the review of the NTA's GDA Strategy and in consultation with TII and relevant local authorities.</p> <p>In any such route a primary objective of South Dublin County Council shall be to protect environmentally sensitive areas including the scenic Liffey Valley parklands, and amenities at Lucan Demesne and St Catherine's Park and Lucan Village and no proposals to continue a road over these lands will be considered.</p>
<p><a href="#">SD-C195-281 Dublin Friends of the Earth</a></p>	<p>This submission advocates for and encourages the implementation of public awareness and education campaign to tackle engine idling, which contributes to carbon emissions.</p>	<p><b>CE Response:</b></p> <p>The Council recognise that there is merit in bringing awareness to the issue of engine idling however, the Development Plan is a</p>



		<p>strategic spatial land use plan, and such proposals are outside the remit of the plan.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Development Plan.</p>
<p><a href="#">SD-C195-237 Caitriona McClean</a></p>	<p>The submission indicates that a flyover or underpass is required at Palmerstown, which would make a significant difference to traffic flow in the outward direction on the N4.</p> <p>The submission makes a number of specific suggestions in regard to traffic and road improvement works including:</p> <p>traffic flow improvements at Griffeen roundabout would be improved with a road widening and extra lane to and from Ring Road R136 in both directions.</p> <p>further traffic calming measures and pedestrian lights are needed at Weston Park.</p> <p>road widening at junction of Adamstown Rd and N4 in the direction downward from Supervalu towards N4.</p> <p>footpath widening and significant upgrading and cutting back is required on Old Celbridge Road towards Lucan village, which would be in keeping with the ten-minute access objective of the plan.</p>	<p>The issues raised are noted. The Draft Development Plan is strategic in nature and cannot address road design issues. However, with regards to Palmerstown, the Draft Plan provides for a Specific Local Objective with regards to this particular road, under Objectives SM4 SLO2:</p> <p><b>SM4 SLO 2:</b> <i>To include an underpass as a part of any traffic management consideration as a practical solution to traffic delays on the N4 at Palmerstown Village.</i></p> <p>The road objective specific to Kennelsfort Road, to provide for a grade separated Junction, is included in Table 7.5 6 Year Road Programme: Upgrade of Existing Junction - <i>Support the provision of a grade separated junction, to be initiated during the first two years of the 2022 to 2028 County Development Plan, to enhance the efficiency of the junction, particularly for buses on the N4/Lucan Road QBC, to ensure safe crossing facilities are provided for all users and to reconnect the Heritage Village of Palmerstown with the newer residential areas of the community.</i></p> <p>In addition, smaller network and junction improvements will be considered under annual programmes (maintenance programme, traffic sections safety improvements schemes, cycle south Dublin)</p> <p><b>CE Recommendation:</b></p>

		No Change to the Draft Development Plan.
<a href="#">SD-C195-270 Alistair Mullan</a>  <a href="#">SD-C195-248 Four Districts Woodland Habitat Group</a>  <a href="#">SD-C195-255 Ne Graver</a>	<p>The submission requests that wording be amended in Table 7.5 - 6 Year Road Programme – Western Dublin Orbital route – the 3<sup>rd</sup> column:</p> <p>In any such route a primary objective of South Dublin County Council shall be to protect the scenic Liffey Valley parklands, and amenities at Lucan Demesne and St Catherine’s Park and Lucan Village, and Rathcoole Woodlands, and no proposals to continue a road over these lands, or in close proximity where it may effect the integrity of any wetlands, habitat or protected species within these lands will be considered.</p>	<p><b>CE Response</b></p> <p>The Draft Plan provides under Table 7.5 ‘6 Year Road Programme’ for the Western Dublin Orbital Route - New road from N81 to the Leixlip Interchange.</p> <p>The need for this route, further connections and possible alternative routes will be determined through the review of the NTA’s GDA Strategy and in consultation with Transport Infrastructure Ireland and relevant local authorities.</p> <p>It should be noted that the submission from the NTA has requested amendments to wording set out in Table 7.5 relating to the Description and function of the Western Orbital Route as follows:</p> <p>From:</p> <p>Description: New Road from N81 to the Leixlip Interchange</p> <p>Function: New Road from N81 to the Link between the N81, N7 and the N4 with a route Leixlip Interchange by-pass function around Rathcoole and Saggart. The need for this route, further connections and possible alternative routes will be determined through the review of the NTA’s GDA Strategy and in consultation with TII and relevant local authorities. In any such route a primary objective of South Dublin County Council shall be to protect the scenic Liffey Valley parklands, and amenities at Lucan Demesne and St Catherine’s Park and Lucan Village and no proposals to continue a road over these lands will be considered.</p> <p>To:</p>

		<p>Description - New road from the N7 to the N4 with a potential extension to the N81</p> <p>Function:</p> <p>New Road to link between the N7 and the N4 Leixlip Interchange with a route by-pass function around Rathcoole and Saggart and the potential for a further extension of this route from the N7 to the N81. The function of this route would be to provide resilience to the M50 in particular between the N7 and N4 and further connections and possible alternative routes will be determined through the review of the NTA's GDA Strategy and in consultation with TII and relevant local authorities.</p> <p>It should be further noted that a primary objective of South Dublin County Council shall be to protect environmentally sensitive areas including the scenic Liffey Valley parklands, and amenities at Lucan Demesne and St Catherine's Park and Lucan Village and no proposals to continue a road over these lands will be considered.</p> <p><b>CE Recommendation:</b></p> <p>Amend Table 7.5 and the Description and function of the Western Orbital Route as follows:</p> <p>From:</p> <p>Description: New Road from N81 to the Leixlip Interchange</p> <p>Function: New Road from N81 to the Link between the N81, N7 and the N4 with a route Leixlip Interchange by-pass function around Rathcoole and Saggart. The need for this route, further connections and possible alternative routes will be determined</p>
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		<p>through the review of the NTA's GDA Strategy and in consultation with TII and relevant local authorities. In any such route a primary objective of South Dublin County Council shall be to protect the scenic Liffey Valley parklands, and amenities at Lucan Demesne and St Catherine's Park and Lucan Village and no proposals to continue a road over these lands will be considered.</p> <p>To:</p> <p><i>Description - New road from the N7 to the N4 with a potential extension to the N81.</i></p> <p>Function:</p> <p>New Road to link between the N7 and the N4 Leixlip Interchange with a route by-pass function around Rathcoole and Saggart and the potential for a further extension of this route from the N7 to the N81. The function of this route would be to provide resilience to the M50 in particular between the N7 and N4 and further connections and possible alternative routes will be determined through the review of the NTA's GDA Strategy and in consultation with TII and relevant local authorities.</p> <p>In any such route a primary objective of South Dublin County Council shall be to protect environmentally sensitive areas including the scenic Liffey Valley parklands, and amenities at Lucan Demesne and St Catherine's Park and Lucan Village and no proposals to continue a road over these lands will be considered.</p>
<p><a href="#">SD-C195-83 Reid Associates</a></p>	<p>The submission makes specific reference to Proposed Variation No.3 to the 2016 Plan with regard to zoning amendments to lands at Ballymount/Naas Rd and the road objective bisecting lands at Wilton Works.</p>	<p><b>CE Response:</b></p> <p>The concerns raised are noted. The roads on the Maps as part of the Draft Plan are indicative and are included to demonstrate the</p>

	<p>It adds that under CS6SLO1, a masterplan for Naas Rd was intended, that this process has not started and that no road's objective has addressed this objective issue in the Draft Plan.</p> <p>In addition, it is stated that there are no reasons given currently for the inclusion of the same road objective linking Oak Road across the Naas Road through the landowner's commercial headquarters and to the Robinhood Road.</p> <p>It is further stated that there is no feasibility set out for such a road objective crossing the main Naas Road in close proximity to two major junctions at the Red Cow and the Nangor Road. The scale of land take, impact and the topographical implications of any potential bridges or on road or off-road intersections would be deemed to have profound implications for the future regeneration of the area.</p> <p>The submission supports the overall land use zoning objective "REGEN" but is conscious that the inclusion of an indicative road objective as set out in map 5 appears predeterminate in respect of major road infrastructure in advance of the development framework /plan for the area.</p> <p>It is further stated that the road layout in the development plan map is indicative and should not prejudice plan led and urban design led strategies at the subject site and should be omitted from the Draft Plan.</p> <p>The submission also indicates that the transport assessment and strategy to be undertaken in accordance with the Urban Regeneration and Development Fund (URDF) should not be constrained by the existing proposed road reservation and needs to reflect the stated urban</p>	<p>importance of improved connections across the Naas Road. The exact alignment remains to be identified.</p> <p>As per the road objective identified under Table 7.5 '6 Year Road Programme' The Council intends for the CityEdge Statutory Plan to provide a more detailed road layout for the area and any associated variations to the County Development Plan would be progressed as required.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Plan.</p>
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	<p>design criteria to transition to a more traditional street network.</p> <p>Table 7.5 of the Draft Plan in regard to the Naas Road Framework Area does not anticipate that the subject road reservation would cross the Naas Road and bisect said lands. Therefore, it is submitted that the written statement does not justify the land use map road reservation which in turn should be deleted.</p>	
<p><a href="#">SD-C195-138 John Spain Associates</a></p>	<p>This submission relates to a greenfield site located to the north of Calmount Road, to the west of Ballymount Avenue, south of the Galco steel site and east of existing warehouse / light industrial units accessed from Ballymount Road Upper.</p> <p>The site is deemed one of the last large scale undeveloped enterprise / employment zoned sites in the Ballymount Industrial Estate area.</p> <p>The submission states that in the context of significant demand for large scale warehouse / logistics units in the Dublin area, the landowner intends to bring forward a planning application in the short term. Such a proposal on the subject site in accordance with the EE- Enterprise and Employment proposal. It is submitted that this has the potential to be compromised by the north-south road proposal through the site.</p> <p>The submission requests the six-year road proposal through said lands to be omitted for the following reasons:</p>	<p><b>CE Response:</b></p> <p>The content of the submission is noted. Planning applications will be assessed on their merit under the current 2016 Development Plan until such time as a new CDP has come into effect.</p> <p>The CityEdge strategic planning framework is at preliminary non-statutory plan making stage however it will be supported by a robust transport assessment.</p> <p>The roads on the Maps as part of the Draft Plan are indicative and are included to demonstrate the importance of improved connections across the Naas Road lands. The exact alignment remains to be identified.</p> <p>As per the road objective identified under Table 7.5 '6 Year Road Programme' The Council intends for the CityEdge Statutory Plan to provide a more detailed road layout for the area and any associated variations to the County Development Plan would be progressed as required. The Council is currently preparing a non-statutory strategic planning framework for these lands that will be supported by a transport assessment.</p> <p>Table 7.5 '6 Year Road Programme' indicates a broader road programme description and to better reflect this it is proposed that</p>

	<ul style="list-style-type: none"> <li>• It will adversely impact on the development potential of the site and its potential to cater for large scale warehouse / logistics facilities.</li> <li>• There is no strategic planning benefit to the road proposal for the area.</li> <li>• The Draft Plan provides limited information supporting the need for the road proposal through the site.</li> <li>• The owners of the Galco steel plant located to the north have no intention of relocating their premise.</li> </ul> <p>The submission also provides supporting information with regards to land use zoning objectives and planning and transportation context. Further rational is provided for supporting the deletion of this road proposal.</p> <ul style="list-style-type: none"> <li>- Maximizing use of available land bank for economic development perspective.</li> <li>- Lack of justification for this particular road's objective.</li> </ul> <p>Is also submitted that the masterplan for the Naas Rd/City Edge will need to be consistent with the planning policy framework and particularly the land use zoning objectives of lands as set out in the County Development Plan.</p>	<p>the following wording be used to outline the function of the Naas Road Area Street Network:</p> <p>From:</p> <p>Formation of a strategic street network within the regeneration lands.</p> <p>To:</p> <p>Formation of a strategic street network within the Naas road Framework area/ City Edge lands’.</p> <p>CE Recommendation:</p> <p>To amend the wording at the end of sentence in the function column Table 7.5 ‘6 Year Road Programme’ for the Naas Road Area Street Network to read as follows:</p> <p>From:</p> <p>Formation of a strategic street network within the regeneration lands.</p> <p>To:</p> <p>Formation of a strategic street network within the Naas road Framework area/ City Edge lands.’</p>
<p><a href="#">SD-C195-173 Greenogue</a></p>	<p>The submission seeks a minor alteration of a Road reservation for the Western Dublin Orbital Route on lands to the west of the Greenogue Equestrian Centre. The submission highlights that Sports Centre Ireland have received a Notification of Decision to Grant Permission</p>	<p>The council notes that the planning permission identified is granted. The roads on the Maps as part of the Draft Plan are indicative and the exact alignment remains to be identified.</p>

	<p>(SDCC Reg. Ref. SD21A/0067) in the vicinity of the proposed Western Dublin Orbital Route, which now affects the application and an existing arena. Therefore, it is suggested alterations to the proposal in the form of minor rerouting of the Road Reservation (remaining within said overall land holding) to allow for the development of the permitted Centre of Excellence as envisaged are required. Several maps are detailed as part of the submission to illustrate the above.</p> <p>The submission notes that the Road proposal is welcomed but wish to discuss minor rerouting to allow for the Sports Centre to operate as per and in consideration with their grant of permission.</p>	<p>The road objectives identified under Table 7.5 6 Year Road Programme require further engagement and design proposals and the Western Orbital Route does not intend to hinder on the granted permission Reg. Ref. SD21A/0067.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft development Plan.</p>
<p><a href="#">SD-C195-234 Development Applications Unit</a></p>	<p>The submission from the DHLGH notes the Councils intention to incorporate GI into cycle path, greenway, public transport and road proposals. However, the Department is concerned that certain greenway and road proposals in the Draft Plan could result in detrimental effects on flora and fauna and their habitats and as such careful assessment of the possible ecological impact of any proposals will be required and effective measures identified to mitigate their potential effects on biodiversity. The greenway planned for the Liffey Valley, part of which is a pNHA could potentially have negative impacts on rare plant species and ancient woodlands, while the proposed Western Dublin Orbital Route from the N81 to Leixlip M4 interchange west of Lucan could threaten the value of this area as a wildlife corridor of the western rural fringe of the county along the Kildare County boundary.</p>	<p><b>CE Response:</b></p> <p>Any planning application or Part 8 application will be required to be carried out in accordance with National and Regional Policy and will be carried out in line with AA and EIA scoping.</p> <p>In addition, provisions under Chapter 3 Natural, Cultural and Built Heritage and Chapter 4 Green infrastructure seek to protect, conserve and enhance the County's biodiversity and ecological connectivity including:</p> <p>Policy NCBH2: Biodiversity – Protect, conserve, and enhance the County's biodiversity and ecological connectivity having regard to national and EU legislation and Strategies.</p> <p>Policy NCBH4: Proposed Natural Heritage Areas – Protect the ecological, visual, recreational, environmental and amenity value of the County's proposed Natural Heritage Areas and associated habitats and species.</p>



		<p>Policy NCBH5: Protection of Habitats and Species Outside of Designated Areas – Protect and promote the conservation of biodiversity outside of designated areas and ensure that species and habitats that are protected under the Wildlife Acts 1976 to 2018, the Birds Directive 1979 and the Habitats Directive 1992, the Flora (Protection) Order 2015, and wildlife corridors are adequately protected.</p> <p>In addition, provisions included in the Draft Plan aim to address situations where potential conflicts may arise. Such provisions are included within Chapter 4 Green Infrastructure such as:</p> <p>GI6 Objective 5: To support the provision of new walkways and cycleways in suitable locations to improve the recreational amenity of GI corridors in a manner that does not compromise the ecological functions of the corridors.</p> <p>GI6 Objective 6: To minimise the environmental impact of external lighting within the GI network to achieve a sustainable balance between the recreational needs of an area, the safety of walking and cycling routes and the protection of light sensitive species such as bats (See Chapter 3 Natural, Cultural and Built Heritage).</p> <p>It is considered that the above provisions address the concerns raised in the submission and therefore no change is required in the Plan.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>
<p><a href="#">SD-C195-246 Josephine Smyth</a></p>	<p>The submission relates to the road markings on Sheet 9 Map 8 of the Draft Plan which shows that the N81 Hollywood Cross to Tallaght Road improvement has been removed even though it has been on Plans since 2004.</p>	<p><b>CE Response:</b></p>

<p><a href="#">SD-C195-292 John Bird</a></p>	<p>The proposed N81 updates remain unchanged both ways but the proposed new route is deemed incomplete and impractical.</p> <p>Concerns over the N81 traffic and safety are raised and concerns over the potential to add cycling lanes and footpaths to offer alternative movement options is raised.</p>	<p>The function under Table 7.6 6 Year Road Programme, provided in the Draft Plan, replaces the indicative road showing on the previous Development Plan maps to the south of the N81. A number of these roads' improvements are currently being undertaken and more improvements are scheduled to be carried out.</p> <p>Some amendments need to be made to the alignment shown on the Draft Plan map to remove a spur which has remained on the draft plan in error.</p> <p><b>CE Recommendation:</b></p> <p>To remove a spur of indicative long term proposal road portion on Map 8 at the N81 as indicated below.</p>
<p><a href="#">SD-C195-292 John Bird</a></p>	<p>The submission requests an Oral Hearing to address the concerns regarding changes to the Long-Term Road Programme around the Saggart area specifically relating to table 7.6 Blessington Road/N81 – Upgrades to N81 from M50 to the County boundary</p> <p>The submission also contains 3 maps with areas delineated in blue for consideration.</p> <p>The submission states that the group requesting an Oral Hearing are comprised of:</p> <p>The Child Family;</p> <p>Mrs Ada Murphy;</p>	<p><b>CE Response:</b></p> <p>An Oral Hearing is not part of the legislative process sets out for the process of preparing a County Development Plan. The submission is therefore dealt with as part of the CE Report as follows:</p> <p>The function under Table 7.6 6 Year Road Programme, provided in the Draft Plan, (Local Improvements to the National Road, junction improvements and road safety measures) replaces the indicative road alternative to the N81 showing on the previous Development Plan maps. A number of these road' improvements are currently being undertaken and more are on the way.</p> <p>Some amendments need to be made to the alignment shown on the Draft Plan map to remove a spur left on the draft plan in error.</p>

	Mr Diarmuid Phelan  Mr Micheal McGuirk	<b>CE Recommendation:</b>  To remove a spur of indicative long term proposal road portion on Map 8 at the N81 as indicated below.
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**Draft**



**Proposed Amendment**

<p><a href="#">SD-C195-166 Galco Steel Ltd</a></p>	<p>The submission refers to Sheet 5 of the Draft Plan which identifies a future road (Road Proposal - 6 Years) running north-south through the subject lands at the Galco Steel site, at Ballymount connecting Ballymount Road Lower (to the north) to Calmount Road (to the south).</p> <p>The submission outlines that there is no specific mention of the proposed road connecting Ballymount Road Lower to Calmount Road, however it presumes that the subject road forms part of the Draft Plan's reference to the plans for 'Greenhill Road Upgrade and Links', which features in Table 7.5 and relates to the "Upgrade of Greenhills Road from Airtown Road to Walkinstown Roundabout with new links to Ballymount Avenue, Limekiln Road and Calmount Road for BusConnects provisions and long-term residential communities."</p> <p>The submission notes that planned bus routes for BusConnects do not include the proposed north-south road. It also notes that the concerned north-south road will terminate at Calmount Road, therefore not providing a throughway and question the usefulness this additional connection through an occupied and operational site.</p>	<p><b>CE Response:</b></p> <p>The content of the submission is noted. Planning applications will be assessed on their merit under the 2016 current Development Plan until such time as a new CDP has come into effect.</p> <p>The CityEdge strategic planning framework is at preliminary non-statutory plan making stage however it will be supported by a robust transport assessment.</p> <p>The roads on the Maps as part of the Draft Plan are indicative and are included to demonstrate the importance of improved connections across the Naas Road lands. The exact alignment remains to be identified.</p> <p>As per the road objective identified under Table 7.5 '6 Year Road Programme' The Council intends for the CityEdge Statutory Plan to provide a more detailed road layout for the area and any associated variations to the County Development Plan would be progressed as required. The Council is currently preparing a non-statutory strategic planning framework for these lands that will be supported by a transport assessment.</p> <p>Table 7.5 '6 Year Road Programme' indicates a broader road programme description and to better reflect this it is proposed</p>

	<p>The submission states that the planned road improvements do not provide a sufficient rationale for running the six-year north-south road through the subject lands.</p> <p>In addition, it is mentioned that the subject site is an EPA Licensed site. There are over 100 HGVs accessing the site per day, a road through the site would therefore require two new access points. The planned road alterations would undermine the baseline of the existing licence and would therefore necessitate a fresh EPA licence application and associated costs. The submission highlights that the occupant seeks to expand their operations in a manner that will intensify the existing industrial use on the site.</p> <p>A Site Location Plan and a Legal Letter are appended to the submission.</p>	<p>that the following wording be used to outline the function of the Naas Road Area Street Network:</p> <p>From:</p> <p>‘Formation of a strategic street network within the regeneration lands.’</p> <p>To:</p> <p>‘Formation of a strategic street network within the Naas road Framework area/ City Edge lands.’</p> <p><b>CE Recommendation:</b></p> <p>To amend the wording at the end of sentence in the function column Table 7.5 ‘6 Year Road Programme’ for the Naas Road Area Street Network to read as follows:</p> <p>From:</p> <p>‘Formation of a strategic street network within the regeneration lands.’</p> <p>To:</p> <p>‘Formation of a strategic street network within the Naas Road Framework area/ City Edge lands.’</p>
<p><a href="#">SD-C195-54 Transport Infrastructure Ireland</a></p>	<p>The submission suggests consideration of the inclusion of a policy position reflecting the requirements outlined in Section 2.8 of the DoECLG Spatial Planning and National Roads Guidelines relating to the provision of service areas and roadside facilities on national roads and the</p>	<p><b>CE Response:</b></p> <p>The Draft Plan under 13.7.3, covers the following with regards to service areas:</p>

	<p>requirement for a forward planning approach to the provision of off-line motorway service areas at national road junctions.</p>	<p>'Motor fuel stations and service areas in proximity to the National Road network will be assessed with regard to the Spatial Planning and National Roads Guidelines for Planning Authorities DECLG, (2012).'</p> <p>The Spatial Planning and National Roads Guidelines for Planning Authorities DECLG, (2012) state that the 'NRA is directly involved in securing on-line motorway service areas in accordance with the provisions of the Roads Act 1993, as amended. As part of these arrangements, the NRA seeks to acquire the necessary lands and to obtain relevant statutory approvals. The intention to provide these online service areas should be catered for in relevant development plans.'</p> <p><i>Note: The NRA is now TII.</i></p> <p>The Only motorways present within the boundary of South Dublin County Council are the M50 and the very start of the M4 from Exit 5 onward for a kilometre before crossing into Kildare County. There are limited options for a service area along these motorway or portions of motorway.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Development Plan.</p>
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Road and Street Design		
Submission No.	Submission Summary	CE response and recommendation
<a href="#">SD-C195-23 Gary Tyrrell</a>	<p>This submission raises the point that a policy of only purchasing Electric Vehicles for the SDCC car/van fleet</p>	<p><b>CE Response:</b></p>

	<p>should be included in the plan and that some car free zones should be included throughout the County.</p>	<p>The submission is noted. The roll out of such measures is an operational matter for the Council to consider and one a matter relevant to the preparation of the County Development Plan.</p> <p>Nonetheless Policy E4 promotes the delivery of EV charging facilities in accordance with relevant regulations and national and regional policy and guidance, while E4 Objective 2 seeks to ensure that all new vehicles purchased or replaced in the Council's fleet are EVs charged from renewable sources or powered by renewable fuels.</p> <p>The issues raised in regard to car free zones is noted. While the plan does not specifically identify car free zones, a strong emphasis is placed on promoting and facilitating the use of active travel modes and public transport throughout the County.</p> <p>The provisions of Chapter 5 in regard to the delivery of connected neighbourhoods and the Public Realm should be noted which place a focus on active transport modes with a key element of healthy placemaking being identifying the need to ensure alternatives to the car in the design of streets and public spaces and to prioritise and promote cycling and walking as active transport modes.</p> <p>The provision of high-quality public transport, greenways and cycleways enhances an area, contributing to more attractive places, creating opportunities for a healthier lifestyle through physical activity and reducing the negative consequences of car-based commuting. Such measures while not specifically identifying car free zones contribute towards the delivery of such areas in an incremental manner.</p> <p><b>CE Recommendation:</b></p>
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		No Change to the Draft Development Plan.
<a href="#">SD-C195-14 Department of Transport</a>	<p>As the Transport Strategy for the Greater Dublin Area is currently being reviewed by the National Transport Authority, SDCC is requested to take the National Disability Inclusion Strategy (NDIS) 2017-2022 into consideration in the Plan.</p> <p>The submission makes reference to action 108 which relates to the 'dishing' of footpaths and action 109 which relates to accessible infrastructure, including bus stops., 'Dishing' is where the footpath is sloped for wheelchair access and lack of the same, is often cited as a major concern for wheelchair users.</p>	<p><b>CE Response:</b></p> <p>The content of the submission is noted. The Council recognises the need for the Draft Plan to include an additional Policy objective under SM2, quoting its alignment with the provisions of the NDIS 2017-2022:</p> <p><i>'To ensure that all streets and street networks are designed in accordance with the principles, approaches and standards contained in the National Disability Inclusion Strategy (NDIS) 2017-2022.'</i></p> <p><b>CE Recommendation:</b></p> <p>To amend the Draft Development Plan to include a new Objective under Policy SM2 to read:</p> <p>SM2 Objective X: <i>'To ensure that all streets and street networks are designed in accordance with the principles, approaches and standards contained in the National Disability Inclusion Strategy (NDIS) 2017-2022.'</i></p>
<a href="#">SD-C195-136 An Post</a>	<p>This submission is made on behalf of An Post and contains a number of issues. Specific to Chapter 7 Sustainable Movement the following issues are raised in regard to road and street design.</p> <p>It is requested that SDCC recognise that any restrictions on the times of deliveries/collections to/from An Post facilities could have a serious impact on the ability of An Post to meet the postal needs of the public and agreed service legal agreements with the State.</p>	<p><b>CE Response:</b></p> <p>The submission is noted. Any planning application put forward by An Post will be assessed on its own merit by the planning Authority.</p> <p>The CDP does not set out any specific traffic or servicing restrictions. However, traffic across the wider Dublin region and South Dublin increases along with the provision of new development including homes and employment space, there will</p>

	<p>It is further requested that engagement be carried out where any future area plans propose to amend delivery hours in town/city locations.</p> <p>Regarding access, it is requested that SDCC consult with An Post to ensure sustainable solutions are considered to maintain a sufficient level of access whilst also improving the appearance and function of town centres, that a sufficient level of vehicle access is maintained and sufficient loading bay space is provided.</p>	<p>be an ever-increasing pressure put on the transport network. An enhanced transport network will be required to better manage this, along with measures to better manage transport demand including parking standards and in certain locations this may require more focused transport management measures including coordinated servicing plans. These would need to be informed by local transport assessments</p> <p>It should be noted that it is an objective of the Plan under SM1 Objective 8:</p> <p><i>'To prepare Integrated Transport Studies for urban areas within the County, as need arises, to provide a long-term plan for the movement of pedestrians, cyclists, public transport and private vehicles and to have regard to the European Commission's Guidelines for Developing and Implementing a Sustainable Urban Mobility Plan (2nd Edition, 2019) in the preparation of such studies.'</i></p> <p>A Sustainable Urban Mobility Plan is a strategic plan designed to satisfy the mobility needs of people and businesses in cities and their surroundings. Such measures encourage a shift towards more sustainable transport modes, supports the integration and balanced development of all modes and would also consider requirements for transport demand management measures.</p> <p>In addition, a new objective is proposed under Chapter 5 QDP14 Objective X:</p> <p><i>'To require a Local Transport Plan to be carried out as part of any LAP preparation process, commensurate to the scale of the LAP.'</i></p> <p><b>CE Recommendation:</b></p>
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		<p>To include a new objective under Chapter 5 QDP14 Objective X to read:</p> <p><i>'To require a Local Transport Plan to be carried out as part of any LAP preparation process, commensurate to the scale of the LAP.'</i></p>
<p><a href="#">SD-C195-156 Avison Young (on behalf of Tesco Ireland Limited)</a></p>	<p>This submission is made on behalf of Tesco Ireland Limited and contains a number of issues. Specific to Chapter 7 Sustainable Movement the following issues are raised in regard to road and street design.</p> <p>This submission requests that no policies are introduced that could lead to any restrictions on deliveries and that SDCC engage with retail operators as part of any future public realm or transportation strategies.</p> <p>Furthermore, it is requested that delivery requirements of convenience food store operators are acknowledged and that policies providing for deliveries, including early morning deliveries, should be encouraged.</p>	<p><b>CE Response:</b></p> <p>The submission is noted, however, the specific aspects presented are beyond the remit of the Development Plan which is a strategic spatial land use plan.</p> <p>As traffic across the wider Dublin region and South Dublin increases along with the provision of new development including homes and employment space, there will be an ever-increasing pressure put on the transport network. An enhanced transport network will be required to better manage this, along with measures to better manage transport demand including parking standards and in certain locations this may require more focused transport management measures including coordinated servicing plans. These would need to be informed by local transport assessments.</p> <p>In this regard it should be noted that it is an objective of the Plan under <b>SM1 Objective 8:</b></p> <p><i>'To prepare Integrated Transport Studies for urban areas within the County, as need arises, to provide a long-term plan for the movement of pedestrians, cyclists, public transport and private vehicles and to have regard to the European Commission's Guidelines for Developing and Implementing a Sustainable Urban Mobility Plan (2nd Edition, 2019) in the preparation of such studies.'</i></p>

		<p>A Sustainable Urban Mobility Plan is a strategic plan designed to satisfy the mobility needs of people and businesses in cities and their surroundings. Such measures encourage a shift towards more sustainable transport modes, supports the integration and balanced development of all modes and would also consider requirements for transport demand management measures.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Daft Development Plan.</p>
<p><a href="#">SD-C195-206 Kevin Rodgers</a></p>	<p>The submission highlights the negative traffic issues around Saggart Village. It is stated that a buildup of traffic is noted from Citywest Hotel to Junction 3a on the N7 (garter Lane), as well as from Citywest Hotel to Junction 4 (Rathcoole). This is heightened during school drop offs.</p> <p>The submission underlines that overdevelopment around Greenogue has resulted in the overcapacity of the road network especially around Junction 3&amp;4 with a high volume of HGVs.</p> <p>the submission suggests the creation of a new road linking Garter Lane and Mill Road to remove traffic volumes in Saggart Village to improve road safety especially around schools. This alternative link road would offer an alternative to entering the village if available.</p> <p>The submission requires updates to Junction 4 to address traffic congestion issues at Greenogue.</p>	<p><b>CE Response:</b></p> <p>The issues raised by the submission are noted. The Draft Plan provides for a Specific Local Objective to support a traffic and transport study for the area which will examine all transport related issues in this area and identify measures to address same.</p> <p><b>SM6 SLO 1:</b> <i>To investigate the need to carry out a traffic and transport study for Rathcoole, Saggart and Newcastle and the surrounding areas following the publication of the GDA Strategy review to 2042 which will clarify the context within which the road network in the area will function and to include a review of HGV movement.</i></p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft development Plan.</p>

Transport Studies and Traffic Management		
Submission No.	Submission Summary	CE response and recommendation
<a href="#">SD-C195-64 Saggart Village Residents' Association</a>  <a href="#">SD-C195-251 Cllr Trevor Gilligan PC</a>	<p>The submissions highlight that the road infrastructure in Saggart has not improved in tandem with its development and population growth, resulting in a congested village at rush hour traffic (in pre Covid times, which can be expected to return post Covid).</p> <p>The submissions request that SM6 SLO 1 be amended from "investigate the need..." to "commit to carry out a traffic and transport study..."</p> <p>It is requested in the submissions that an SLO be added to undertake a traffic management strategy for Saggart as has been identified under SM6 SLO 2 for Lucan.</p>	<p><b>CE Response:</b></p> <p>The content of the submissions is noted.</p> <p>Under SM6 SLO1 the Draft Plan seeks '<i>To investigate the need to carry out a traffic and transport study for Rathcoole, Saggart and Newcastle and the surrounding areas following the publication of the GDA Strategy review to 2042 which will clarify the context within which the road network in the area will function and to include a review of HGV movement</i>'.</p> <p>It should be further noted that the Council have previously lodged a submission to the NTA on the GDA Strategy review to request a comprehensive Modelling study of Rathcoole, Saggart, Greenogue and environs areas demonstrating South Dublin County Councils commitment to addressing traffic and transportation issues within these areas.</p> <p>In light of the above it is considered that the provisions set out in the plan area adequate.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft development Plan.</p>
<a href="#">SD-C195-281 Dublin Friends of the Earth</a>	<p>This submission looks for the introduction of 30kmph speed limits throughout SDCC in order to make our streets safer and reduce carbon emissions.</p>	<p><b>CE Response:</b></p> <p>The request is noted, however, it is beyond the remit of the Development Plan to set specific speed limits throughout the County. Such provisions are set out through Bye-Laws under</p>

		<p>Section 46 of the Road Traffic Act, 1961 (No. 24 of 1961) as amended by Sections 4-9 of the Road Traffic Act, 2004 (No. 44 of 2004), Part 19 of the Local Government Act 2001 as amended. ¶</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft development Plan.</p>
<a href="#">SD-C195-78 Recorder Residents Association</a>	<p>The submission suggests that when accidents/incidents close lanes on the N4, N7 and M50, advance warning at all available locations around the city should be 'posted' to give drivers the option of choosing an alternative route well in advance of the congestion and on ramps' should be closed and traffic already on the motorway directed off at earlier exits.</p>	<p><b>CE Response:</b></p> <p>The merit of the submission is noted. However, this a matter for Transport Infrastructure Ireland.</p> <p><b>CE recommendation:</b></p> <p>No Change to the Draft development Plan.</p>

Car Parking		
Submission No.	Submission Summary	CE response and recommendation
<a href="#">SD-C195-9 Tracy Walsh</a>	<p>The submission has expressed concern relating to the sheer volume of SHD applications in Fortunestown area and no proper consideration and thought being given to car parking provision. Parking along Garter Avenue is a major problem as residents are parking on the main road.</p>	<p><b>CE Response:</b></p> <p>South Dublin County Council, through its Development Plan, supports the sustainable development of Fortunestown forming part of the Citywest/Saggart/Rathcoole/Newcastle Neighbourhood Area and provides for objectives to reduce the dependence on cars in supporting alternative options under Chapter 7 Sustainable Movement.</p>

		<p>It is a policy of the Draft Plan, under SM7 to Implement a balanced approach to the provision of car parking with the aim of using parking as a demand management measure to promote a transition towards more sustainable forms of transportation, while meeting the needs of businesses and communities.</p> <p>Section 13.8.2 of Chapter 13 of the Draft Plan sets out the car parking standards for the County. In addition, the Sustainable Urban Housing: Design Standards for New Apartments, 2020 states the following</p> <p><i>'The quantum of car parking or the requirement for any such provision for apartment developments will vary, having regard to the types of location in cities and towns that may be suitable for apartment development, broadly based on proximity and accessibility criteria.'</i></p> <p>The cited criterion can be found under Section 4.0 Communal Facilities in Apartments.</p> <p>The level of car parking provision for developments is assessed during the planning application stage in accordance with the above criteria and standards.</p> <p>In regard to the specific issue raised in regard to Parking along Garter Avenue it should be noted that this issue has been referred to the transport section for further consideration and analysis.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Development Plan.</p>
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<p><a href="#">SD-C195-15 WORK Residents Association</a></p> <p><a href="#">SD-C195-109 South Dublin Conservation Society</a></p> <p><a href="#">SD-C195-240 Pamela Kearns</a></p>	<p>A submission requests that extra car parking facilities are provided within Tymon Park and suggest Limekiln Road/Limekiln Ave junction as a possible location.</p> <p>It is further suggested that the Poddle Flood Alleviation works will require a depot and this depot should be converted to a car parking once the works are finished. A further submission expresses support for these facilities.</p>	<p><b>CE Response:</b></p> <p>Proposals seeking the introduction of additional car parking at specific locations, and the manner in which that parking is secured, is a detailed operational matter for the Council to consider and is not a matter for the County Development Plan.</p> <p>The Part 10 planning process for the Poddle Flood Alleviation Scheme includes a temporary works compound along Limekiln Road; approximately 400 meters from the entrance to existing car park.</p> <p>A decision is pending from An Bord Pleanala and if the scheme proceeds, the compound will be required for approximately 24 months.</p> <p>The Parks Department cannot make any commitment at present as to not interfere with the Poddle FAS application. However, the Parks Department intends to review the car parking provision in Tymon Park to assess the need for additional car parking spaces.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>
<p><a href="#">SD-C195-136 An Post</a></p>	<p>This submission requests that SDCC provide flexibility with car parking standards for An Posts postal sorting facilities which require sufficient car parking spaces to operate. Postal facilities may require a greater quantum of car parking spaces as postal trends continue to evolve.</p>	<p><b>CE Response:</b></p> <p>The submission is noted. Section 13.8.2 Car Parking Standards of the Plan addresses parking requirements. The type of facility provided by An Post, whether within Zone 1 and Zone 2, would not fall within a particular category, allowing for maximum parking rates to apply. However, such instances will be</p>



		<p>considered on their merits and specific operational requirements by the Development Management Section.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p><a href="#">SD-C195-19 Knocklyon Network</a></p>	<p>The Submission highlights the need to look at facilitating more electrical cars, including public charging points as well as a county plan for shared electric public cars, especially to serve apartment blocks</p>	<p><b>CE Response:</b></p> <p>The suggestion is noted. In this regard, Section 7.10.2 of Chapter 7 Sustainable Movement of the Draft Plan specifies policies and objectives which relate to Electric Vehicles. The following Policy Objective directly supports increasing the network of EV car charging points:</p> <p><b>SM7 Objective 5:</b> <i>To support the expansion of the EV charging network by increasing the provision of designated charging facilities for Electric Vehicles on public and private land in partnership with the ESB and other relevant stakeholders; and to support the Dublin Regional EV Parking Strategy.</i></p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft development Plan.</p>
<p><a href="#">SD-C195-109 South Dublin Conservation Society</a></p>	<p>The submission considers that instead of creating car parking facilities on Hell Fire Hill or other locations in the Dublin Mountains that a shuttle service running from the nearest public transport stops to these popular locations will go towards achieving climate action audit and policies.</p>	<p><b>CE Response:</b></p> <p>The proposal set out in the submission is noted. Planning permission has been granted for the delivery of the Dublin Mountains Visitor Centre with associated parking and transport arrangements.</p>

		<p>The provision of a shuttle bus that would interchange with cross cutting public bus routes is supported in principle. This would help to alleviate a level of car parking requirements and contribute towards addressing climate change. However, it should be noted that the provision of a bus shuttle service is a detailed transport operational matter for bus providers i.e NTA, Local Link and others to consider.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft plan.</p>
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<b>Maps</b>		
<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation</b>
<a href="#">SD-C195-125 Enda P Conway</a>	<p>The submission relates to lands in Newcastle and is accompanied by a map. Part of these lands are subject to a planning permission granted under SD17A/0378. The submission notes that Sheet 7 of the zoning maps shows a portion of the development permitted under SD17A/0378 constructed. Street no. 4 of the permission is not included.</p> <p>The submission indicates that the construction of this road awaits the resolution of the development of the plot between Street 3 and Street 4 and that a planning application in this respect is soon to be lodged. The submission notes that the plot is zoned residential in the Draft Plan. It is submitted that the alignment of Street 4 was set out by the Planning Authority to represent the definitive alignment of the east/west boulevard linking adjoining neighbourhoods on either side and that this was</p>	<p><b>CE Response:</b></p> <p>The Council is actively working with the relevant landowners to satisfactorily resolve the road network and the delivery of the neighbourhood park 'Burgage South Park in line with the provisions of the Newcastle Local Area Plan. In this regard and in response to the OPR submission the CE has recommended that a phased approach to the delivery of such infrastructure be put in place. Please referent CE recommendation to submission 227 Office of the Planning Regulator and Appendix 1 titled Newcastle to this report.</p> <p>With specific reference to the point set out that the Draft Plan shows a proposed link road joining into Street 3 of SD17A/0378. The indicative road lines do not indicate a link road to street 3 of this existing development. While a pedestrian/cycle connection</p>

	<p>necessitated by the decision to grant permission for the primary school road and school buildings, which adversely affected the Newcastle LAP provisions by encroaching on the Neighbourhood park and the road defining its northern boundary. The submission suggests that this road be confirmed in the review. It is noted that the roads continuation eastwards from the school road roundabout is already shown on the Draft Plan.</p> <p>The submission notes that the Draft Plan shows a proposed link road joining into Street 3 of SD17A/0378. This proposal is considered to be contrary to the provisions of the Newcastle LAP and makes no planning sense as Street 3 is a restricted access cul-de-sac. It is submitted that a pedestrian and cycle connection would be appropriate here as the junction with school road was conditioned to be restricted in width.</p> <p>It is submitted that the logical road pattern in this location would be to omit the link into Street 3, provide the boulevard link, continued westwards to link into the approved residential street on the lands to the west which runs north/south past Street 3 thus eliminating the link into Street 3, which would restore the statutory LAP provisions in this vicinity.</p>	<p>would be favourable in terms of connectivity the lines in the Draft Plan maps are indicative and will be subject to detailed design in accordance with the phased development of this area in tandem with the delivery of necessary infrastructure.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Development Plan.</p>
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# **Chapter 8:**

## **Community Infrastructure and Open Space**

## Chapter 8: Community Infrastructure and Open Space

Social/Community Infrastructure: Fortunestown, Citywest. Saggart/ Rathcoole		
Submission No.	Submission Summary	CE response and recommendation
SD-C195-1 Alison Sheppard	A submission relates to the Fortunestown / Citywest area and identifies that the area is lacking community facilities such as a community centre or sports facilities which were meant to be delivered as part of the LAP.	<p><b>CE Response:</b></p> <p>Multiple submissions express concern about the lack of community facilities being delivered in the Fortunestown/Citywest Area despite the rapidly growing population and significant ongoing development in the area.</p> <p>The Council is committed to resolving these issues and have taken a number of steps to do so. Planning applications which include residential developments submitted within the Local Area Plan lands are assessed against the LAP and are required to comply with the policies and objectives as set out in the plan. It is acknowledged that a number of SHD planning applications have been approved that exceed the density levels identified in the adopted Local Area Plan.</p> <p>South Dublin County Council monitors progress on the delivery of the County's LAPs and seeks to address outstanding infrastructure or community facilities which are required to be provided as part of the Local Area Plan. In addition, the Draft County Development Plan includes a range of objectives to ensure infrastructure and services are delivered in tandem with development, as set out below.</p> <p>The Fortunestown Local Area Plan was adopted in 2012. Delivery on the ground really began in 2016/2017 which coincided with pressures nationally to provide for housing amid the ongoing</p>
SD-C195-6 Nichola Priestley	Several further submissions highlight that Citywest area lacks facilities such as sports halls, sports pitches/astro pitches, playgrounds and running and cycle tracks for its ever increasing population and requests that more community facilities in Citywest area are provided for the needs of the existing community.	
SD-C195-8 Lisa A Lowry	A submission calls for a commitment in writing in the County Development Plan to provide Library in Fortunestown LAP area.	
SD-C195-9 Tracy Walsh	Further submissions highlights that Citywest area lacks library facilities for the existing community and for the increasing population growth.	
SD-C195-7 Sinead O'Driscoll	A submission has highlighted that Citywest area lacks outdoor open space for the existing population and for area for people to use, especially young people.	
SD-C195-112 John Spain Associates	Highlights the need for a Garda Station in the Citywest area. the lack of community facilities in the Citywest area has brought about anti-social behaviour, especially in these Covid times with the schools closed. The huge population growth in the last 8 years coupled with the lack of community facilities has created an area were people want	
SD-C195-46 Edel Sherlock		

	<p>to feel safe in their own community and consider that a Garda Station is required.</p> <p>Highlights that due to the lack of community facilities such as sports halls, library, community centre, playgrounds, running and cycle tracks for its ever increasing population is contributing to anti-social behaviour in the area and as such the Council should consider the provision of a Garda Station.</p> <p>Highlights that the increased anti-social behaviour in and around Citywest shopping centre, which is very intimidating for residents.</p> <p>Highlights the need for a new Garda station in this area to cope with the huge population increase in recent times and the increased problem of anti-social behaviour especially around Citywest Shopping centre.</p> <p>Submission supports the delivery of social and community infrastructure in tandem with the development of residential dwellings in the Citywest area in line with COS2 SLO 1, COS3 SLO 2, COS8 SLO 1 and COS10 Objective 4.</p> <p>A submission expresses that the Council appears to have no intention to improve or extend local recreational amenities in Saggart Village or Citywest. That Draft Development Plan Guidelines require social audits to be carried out and wonders if one has been carried out as part of this Plan. The submission goes onto acknowledge the new community centre in Saggart but considers this will be inadequate for the existing and future population and also notes that Saggart has no library, public parks or major open spaces in the village and yet the Council appears to have no plans to provide any based on the draft Development Plan. Citywest is similar with one small park being completely inadequate for the requirements of the</p>	<p>housing crisis. The Council recognises the delivery of some community and amenity infrastructure has been slower than recent housing delivery. However, planning permissions are now in place to meet the phasing requirements of the LAP, including community facilities, childcare facilities and public open space.</p> <p><u>Infrastructure delivery in Fortunestown</u></p> <p>Community Space: 592sqm of community floorspace has been granted permission with 127sqm under construction. In addition, SDCC is aware of the increase in population within the LAP boundary and has identified the need for a large Community Centre Facility to serve the community. The Council is committed to the delivery of this large community facility within the LAP lands on a well-located site, within close proximity to the Luas and other complementary uses. Options continue to be explored. Capital funding for the delivery of this facility is committed in the 2022 Capital Budget. COS3 SLO 2 seeks to deliver a community centre/community facilities within Citywest as part of the delivery of infrastructure identified in the Fortunestown Local Area Plan and COS4 Objective 1 'to promote the provision and management of high-quality, multi-functional, sport and recreational infrastructure across the County to meet existing and future needs, to include sports hubs and multi-sport astro-pitches.'</p> <p>Parks: A 4.58ha District Park in Saggart-Cooldown Commons in accordance with the LAP is now under construction. In addition neighbourhood parks are required and permitted to be delivered in tandem with new housing developments including a linear park on Citywest Road and new parks at Fortunestown Centre and Boherboy. To support this, the Council's Sports Pitch Strategy assists in the provision of playing pitch/Astro pitch facilities in the</p>
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	<p>area. There appears to be no plans to increase the number of playing pitches in the area despite it being the fastest growing settlement in the County. The new schools promised for the area have not been delivered. The submission notes that the proposed new schools at Fortunestown Lane are being opposed by a small group of residents. The submission notes that Saggart require the delivery of two new schools, pre-school facilities, a new park and sport pitches for the entire area. The residents of Saggart despair at the lack of action by the Council.</p>	<p>County. Informal sports and play facilities are being developed through the County Teenspace Strategy. A review of running tracks is being carried out to assess the provision of running tracks across the County and to provide for such provision if required.</p> <p>Junction upgrades: A major junction upgrade at Fortunestown Lane / Citywest Road have been completed with provision of cycleways.</p> <p>Library: There is an ongoing County wide review of library facilities. The Council is committed to the provision of a new library facility in Fortunestown. No specific site has been identified yet for the library, however work on this is currently underway. This commitment to providing a library in the area is further set out in COS10 Objective 4 of the draft South Dublin County Council Development plan states 'To support the delivery of a new library service in the Citywest area to meet the needs of the expanding population subject to any review of the Library Strategy</p> <p>Schools: the Fortunestown Local Area Plan 2012 identifies six primary schools and two post primary/secondary schools within the wider 'Study Area' of the LAP boundary including Mount Seskin Community College, St Thomas National School, St Aidans Community School and St Mary's National School.</p> <p>Since the adoption of the Fortunestown LAP, three new schools have been delivered with the LAP boundary area including Scoil Aoife (PS), Citywest &amp; Saggart Community National School (PS) and Citywest Educate Together National School (PS).</p> <p>The Draft Development Plan Maps identifies 2 further school sites in the Citywest/Fortunestown area – 1 no. site off Fortunestown</p>
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		<p>Lane and 1 no. site on lands situated between Carrigmore Avenue and Boherboy Road.</p> <p>With regard to the School Site identified in the Development Plan Maps off Fortunestown Lane, it is noted that planning permission was granted under SD19A/0393 for a new educational campus to comprise of a post primary school and a primary school to be delivered on a phased basis at this site.</p> <p>With regard to post-primary requirements for the Citywest/Saggart/Newcastle/Rathcoole, the Department of Education (DES) in their submission indicate that a further post-primary school will be required in the medium term to meet the projected future needs and that this need is identified in the Draft Plan through the Specific Local Objective under COS8 SLO 1:</p> <p><i>COS8 SLO 1: To identify a site for the appropriate location of a new post primary school within the Neighbourhood Area of Citywest/Saggart/Rathcoole/Newcastle to provide for the needs identified for the catchment area by the Department of Education and Skills.</i></p> <p>The DES also notes in their submission that the proposed school at Belgard Square North in Tallaght Town Centre could also contribute to meeting the projected need for a post-primary school.</p> <p>In addition, the Council is committed under Policy COS8(a) to work in conjunction with the Department of Education and Skills to promote and support the provision of primary and post-primary schools in the County to reflect the diverse educational needs of communities, and under Policy COS8(b) to engaging with the Department of Education and Skills and support the Department's School Building Programme by actively identifying sites for primary and post primary schools at suitable locations, based on forecast need.</p>
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		<p>It is considered, therefore, that the provisions of the Draft Plan, including COS8 SLO 1 and Policies COS8(a) and COS8(b) and the identification of school sites on the Draft Development Plan Maps satisfactorily addresses the issues raised by the Department in respect to the provision of schools to meet the projected needs of the area.</p> <p>Garda Station: In the report to the Council on the Extension of Fortunestown Local Area Plan 2012 it is noted that the LAP includes to make provision for a Garda Station, subject to need, off the Outer Ring Road and Citywest Avenue. (Objective LUD2b). The determination of the need for the development of a new Garda Station in the Fortunestown area, or at any other location, is dependent on the Department of Defence and An Garda Síochána and is considered in the context of the overall accommodation requirements of the Garda workforce. No request for a site for the location of a new Garda station has been received from the Department of the Defence or An Garda Síochána to date. Should such a request be made, South Dublin Council will endeavour to facilitate this request, where possible.</p> <p><u>Draft Plan Objectives for Fortunestown</u></p> <p>A number of objectives are contained in the Draft Plan that provide for the delivery of additional social/community infrastructure, including:</p> <p><i>CS3 Objective 6: 'To ensure the phased development of new housing areas in tandem with the delivery of physical and social infrastructure provision as identified within Local Area Plans or as informed by assessments carried out by the Planning Authority.'</i></p>
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		<p><i>COS8 SLO 1: To identify a site for the appropriate location of a new post primary school within the Neighbourhood Area of Citywest/Saggart/Rathcoole/Newcastle to provide for the needs identified for the catchment area by the Department of Education and Skills.</i></p> <p><i>COS10 Objective 4: To support the delivery of a new library service in the Citywest area to meet the needs of the expanding population subject to any review of the Library Strategy.</i></p> <p>In light of the above, it is considered that sufficient measures are in place to provide for the ongoing delivery of infrastructure and services in tandem with development in the Fortunestown/Citywest and Saggart areas. In addition, a Social Infrastructure Audit for the County was carried out to inform the preparation of the County Development Plan. The purpose of a Social Infrastructure Audit is to examine and analyse the availability and capacity of existing social infrastructure facilities within South Dublin County to determine future requirements and make CE Recommendation:s based on anticipated growth in population and accordingly identification of where future investment is required. As part of the social infrastructure audit, standards were examined and applied for specific facilities to ensure alignment with projected population growth for new development areas: Primary Care Centres, Childcare Facilities, Schools, Community, Public Open Space and Parks. The SIA has informed a summary of existing and planned community facility provision for each neighbourhood area which informs Chapter 12: <i>Our Neighbourhoods</i>' of the Draft Plan</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan</p>
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<p>SD-C195-1 Alison Sheppard</p> <p>SD-C195-6 Nichola Priestley</p>	<p>A submission calls for a commitment in writing in the County Development Plan to provide a community centre in Fortunestown LAP area.</p> <p>A further submission highlights that Citywest area lacks community centre facilities for its increasing population growth</p>	<p><b>CE Response:</b></p> <p>To date 592sqm of community floorspace has been granted permission in six different development sites within the Fortunestown LAP lands, which are at various stages of construction. SDCC are committed to providing a large community centre facility within the LAP boundary area, in close proximity to the LUAS and other complimentary uses. The Council is committed to deliver this as provision has been made in the SDCC Capital Programme 2021-2023 for community centre/facility within the Fortunestown LAP.</p> <p>In addition to the 592sqm floorspace under construction in Citywest, St Mary's Schoolhouse Community Centre in Saggart, once completed will increase the community centre floorspace in the area by a further 610sqm.</p> <p>The development plan is a strategic spatial land use plan and it has included a specific location objective COS3 SLO 2: To deliver a community centre/community facilities within Citywest as part of the delivery of infrastructure identified in the Fortunestown Local Area Plan.</p> <p>The provisions of the Plan are considered sufficient.</p> <p><b>CE Recommendation:</b></p> <p>No Change to Draft Plan</p>
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Social/Community Infrastructure: Saggart, Rathcoole		
Submission No.	Submission Summary	CE response and recommendation
SD-C195-64 Saggart Village Residents' Association	The submissions note the Draft Plan commitment to identifying a site for the appropriate location of a new post primary school within the Neighbourhood Area of Citywest/Saggart/Rathcoole/Newcastle. In this regard, the	<p><b>CE Response:</b></p> <p>All proposals for development in the County are assessed having regard to a whole range of issues including</p>

<p>SD-C195-251 Cllr Trevor Gilligan PC</p>	<p>submissions call for the impact on existing infrastructure / traffic be considered when assessing a location for the much needed post primary school.</p> <p>The submissions indicate that an SLO to provide additional outdoor facilities for residents in Saggart such as a playground for children, additional furniture for the village centre and well lit up public spaces, running track, would be welcomed.</p> <p>The submissions welcome the Draft Plan's commitment to support the delivery of a new library service in the Rathcoole environs, to meet the needs of the expanding population.</p>	<p>traffic. Objectives in the Draft Plan, COS8 Objective 6 in particular, also include for new schools to be located to promote walking and cycling and access to public transport.</p> <p>COS4 Objective 1 promotes the provision and management of high-quality, multi-functional, sport and recreational infrastructure across the County to meet existing and future needs, to include sports hubs and multi-sport astro-pitches, in accordance with the South Dublin County Council Sports Pitch Strategy (2020), the National Sports Policy (2018-2027) and the aims of the South Dublin County Sports Partnership, consistent with RPO 9.15 of the RSES.</p> <p>COS3 Objective 4 is also noted, it requires outdoor space to be incorporated into community centre development: 'To ensure that community buildings are multi-functional and adaptable, can be used by all age cohorts (intergenerational), providing for indoor and supporting outdoor use.'</p> <p><b>COS4 Objective 16</b> is also noted which supports the provision of athletics facilities in the County examining the potential for their location within Regional Parks and other locations in accordance with <i>SDCC's Sports Pitch Strategy 2020</i> and the development of the County Sports Plan and Parks and Open Space Strategy.</p> <p>The Council is currently examining the need for running tracks within the County and this will inform future provision.</p> <p>The provision of street furniture and associated public lighting are a matter for the public realm department of the Council in consultation with the Council's Public Lighting Section.</p> <p>In respect of playgrounds <b>COS5 Objective 25</b> states as follows 'To continue to provide innovative play spaces, including sensory play areas and play trails, in parks and open spaces throughout the County and to identify the quietest and busiest</p>
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		<p>times at SDCC playgrounds and share this information so it may be useful to visitors so they can identify quiet times and quieter playgrounds and plan their visits accordingly.'</p> <p><b>COS4 Objective 5:</b> 'To support the provision of formal and informal play areas with appropriate equipment and facilities, incorporating nature-based play opportunities across the County, ensuring that the needs of differing age groups and abilities are accommodated'</p> <p><b>COS4 Objective 6:</b> 'To facilitate the provision of appropriately scaled children's play facilities and teen space facilities at suitable locations across the County within existing and new residential development.'</p> <p>The Draft Plan contains sufficient policy and objectives to provide for the issues raised in the submission</p> <p><b>CE Recommendation:</b></p> <p>No Change to Draft Plan</p>
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<b>Social/Community Infrastructure</b>		
<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation</b>
<a href="#">SD-C195-11 Proinsias Mac Fhlannchadha</a>	<p>Submission calls for Social community Infrastructure to include libraries and public swimming pools/ gyms as they are key elements of social infrastructure. Appropriate guidelines and standards should be applied to ensure alignment with projected population growth for new development areas and suitable sites should also be identified as part of this Development Plan for same.</p>	<p><b>CE Response:</b></p> <p>Libraries in the County are delivered through the County's Library Strategy and this is supported by COS10 Objective 1 of the draft Plan which states:</p> <p>To support the development of the County's library services and the implementation of key objectives, as set out in <i>Open to You - South Dublin Library Development Plan (2018-2022)</i> or any superseding document.</p>

		<p>Swimming pools are provided by both the public and private sector. The council is currently progressing a new pool in Lucan. COS4 Objective 15 is also relevant which states:</p> <p><i>To provide a swimming pool with leisure facilities in the Rathfarnham/Knocklyon/Firhouse areas</i></p> <p>The need for swimming pools will be kept under review by the Council.</p> <p>It is considered that the draft Plan contains sufficient policy to ensure the appropriate delivery of both swimming pools and libraries in the County.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<p>SD-C195-19 Knocklyon Network</p>	<p>Submission sets out that while the Knocklyon Network supports much of the Aspirations within the Draft Development plan and plans to build a much better, more inclusive, socially conscience and sustainable community, there is a feeling in Knocklyon Firhouse that as a community we are neglected when it comes to community infrastructure.</p> <p>Submission puts forward that the Knocklyon-Firhouse has got more than its share of growth over a short time and now has a major shortage of amenities in the area such as a health Centre, Library, more schools, more public transport, more shops, more playing fields, a Swimming pool complex, Community Centre and most of all a playground.</p>	<p><b>CE Response:</b></p> <p>Provisions, policies and objectives pertaining to the provision of community facilities to meet needs of existing and growing populations are set out under Chapter 8, Section 8.4 Social/Community Infrastructure of the CE Draft Plan including the following:</p> <p>Policy COS 2 Social/Community Infrastructure- Support the planned provision of a range of universally accessible and well-connected social, community, cultural and recreational facilities, close to the communities they serve, in accordance with RPO 9.14 of the RSES. (See also Chapter 5, Quality Design and <i>Healthy Placemaking</i>)</p> <p>COS 2 Objective 1 - To support the provision of a wide range of community facilities and to ensure that such facilities are provided in new communities in tandem with housing development, and in</p>

	<p>Submission raises concerns about a bias in the Council towards the eight villages in relation to the provision of community infrastructure.</p>	<p>accordance with the phasing requirements of Local Area Plans and Planning Schemes.</p> <p>COS 2 Objective 2 - To promote the timely provision of primary care centres, childcare facilities, schools, community centres and public open space according to the standards set out in section 8.4.1 of this Plan.</p> <p>COS 2 Objective 3 - To protect and enhance existing community facilities, and to support the development and expansion of new and existing facilities and services, in proximity to the populations they serve, where their need is identified.</p> <p>Comments in relation to the 8 villages are noted. The approach taken in the preparation of the County Development Plan has been to look at the County at a neighbourhood level. This is set out in Chapter 12 of the Plan. Each neighbourhood refers to a particular part of the County and policy applies to all equally. The Firhouse, Knocklyon area is within the Templeogue/Walkinstown/Rathfarnham/Firhouse Neighbourhood area. Chapter 12 of the draft Plan has looked at this area in more detail and applied the policy through a map based approach outlining the location of proposed projects or enhancements.</p> <p>The draft Plan does not provide for any bias in the its approach to infrastructure provision.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<p><a href="#">SD-C195-124 ERF Lucan Investment DAC</a></p>	<p>This submission mentions section 8.4.2 in the Draft CDP states that the Council may review its Development Contribution Scheme (DCS) 2021-2025 to align with the new Development Plan. The submitter encourages the council to undertake a review of the current DCS as soon as possible to address misalignment with national guidance.</p>	<p><b>CE Response:</b></p> <p>The Council's Development Contribution Scheme 2021-2025 was made by the Council in October 2020, effective from 1<sup>st</sup> January 2021.</p>



	<p>Section 2 of 'Development Contributions: Guidelines for Planning Authorities' states 'Planning Authorities are required to include the following in their development contribution schemes: waivers in the case of change-of-use permissions, where change-of-use does not lead to the need for new or upgraded infrastructure / services or significant intensification of demand placed on existing infrastructure (including, for example, transport infrastructure)'.  The Councils DCS does not include any waivers for change of use proposals. Accordingly, it is requested that the Councils DCS is reviewed to insert a waiver required by Government guidance in respect of change-of-use proposals.</p>	<p>The scheme was made in accordance with <a href="#">Section 48 of the Planning and Development Act, 2000</a>, as amended, and in line with the "Development Contributions: Guidelines for Planning Authorities"  Schemes are required to secure investment in capital infrastructure and economic activity, and neither the current or previous Development Contribution Schemes provide for carte blanche exemption in the respect of development for change of use.  Nonetheless, the current scheme does provide as follows in respect of Change of Use: <i>See Circumstances where no contribution, or a reduced contribution apply (11 xxvi)</i>  <b>....Where development contributions were paid in respect of the former use the contribution payable on the new use shall be net of the quantum previously paid for.....</b>  The Council may review its Development Contribution Scheme (DCS) 2021-2025 to align with the new Development Plan once made, and should that review be initiated, all existing exemptions will form part of that review.  <b>CE Recommendation:</b>  No change to Draft Plan.</p>
<p><a href="#">SD-C195-222 Tallaght Community Council</a></p>	<p>Submission looks for a proactive approach to community building by requesting a service assessment with Tallaght hospital, Tallaght Gardai and Dublin Fire Brigade, where they are asked what additional resources they would need to safely service an additional 30K people over the next 15 years in Tallaght town centre area.</p>	<p><b>CE Response:</b>  At pre-draft stage of the County Development Plan consultation the HSE, Gardai and Dublin Fire Brigade engaged with the plan process as part of a series of stakeholder meetings. This informed the Draft Plan. It is also noted that further public consultation has been undertaken on the Draft Plan providing further opportunity to make submissions.  The Draft Plan includes policy and objectives for Healthcare and for physical and social infrastructure. This supports infrastructure such</p>

		<p>as Garda Stations but it is noted that this is a matter for the Department of Defence.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
SD-C195-254 Deputy Emer Higgins	<p>The submission suggests that the Plan provides an opportunity to insert a Special Local Objective for the provision of a Garda Station in Clonburris.</p> <p>It is stated that the development of a new town between Lucan and Clondalkin will put additional strain on Garda Stations like Lucan, Clondalkin and Rathcoole and submits that ear-marking a site in Clonburris for the delivery of a Garda Station would help alleviate that growing pressure.</p>	<p><b>CE Response:</b></p> <p>Clonburris SDZ contains provision for a Garda station as follows in the SDZ in section 2.7.5 Garda Station:</p> <p><i>Provision is made for such Garda Station in the Clonburris SDZ as may be necessary, the said site to be used as an alternative community facility in the event that it is not required by An Garda Síochána. In the event of An Garda Síochána identifying the need for the provision of a Garda Station at Clonburris, the station can be accommodated within the Kishoge or Clonburris Urban Centres</i></p> <p>Ultimately the location of Garda Stations is a matter for An Garda Síochána in consultation with the delivery team of the Planning Scheme. The County Development Plan has no remit in respect of the planning scheme.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
SD-C195-154 Tallaght Community Council	<p>The submission requests that COS2 Objective 4 be amended as such: "To support clustering.... without negatively restricting the range of services provided in any one centre"</p> <p>It also requests to amend COS2 Objective 2 as such: "...changing rooms facilities...." Instead of "wheelchair toilet facilities".</p>	<p><b>CE Response:</b></p> <p>The submission requests an amendment to COS2 Objective 4.</p> <p><b>COS2 Objective 4:</b></p> <p>To support the clustering of community facilities such as community centres, sports and leisure facilities, schools, childcare facilities and open spaces to create multi-purpose community hubs.</p> <p>The proposed amendment is as follows:</p>

		<p>To support the clustering of community facilities such as community centres, sports and leisure facilities, schools, childcare facilities and open spaces to create multi-purpose community <b>hubs without negatively restricting the range of services provided in any one centre.</b></p> <p>This submission also is requesting to amend COS2 Objective 2 to “...changing rooms facilities...” Instead of “wheelchair toilet facilities”. COS2 Objective 2 does not relate to wheelchair toilet facilities, as seen below. It does appear relevant to COS2 Objective 7 stated below. However, the context of the amendment does not appear correct. No change to Draft Plan recommended.</p> <p><b>COS2 Objective 2:</b></p> <p>To continue to work closely with the Health Service Executive, Department of Education and Skills and the relevant public bodies and state agencies to meet the necessary provision of primary care centres, childcare facilities, schools, community centres and public open space according to the standards set out in section 8.4.1 of this Plan.</p> <p>It is not clear to which objective the proposed amendment relates.</p> <p><b>COS2 Objective 7:</b></p> <p>To support and facilitate access to public toilet facilities including wheelchair accessible toilet facilities in community related buildings in Council ownership, in all towns and villages in the County.</p> <p>It is considered that no amendment is applicable to COS2 Objective 2 and no change is recommended for COS2 Objective 7 to which the submission appears to relate. However, the proposed amendment to COS2 Objective 4 is considered reasonable.</p> <p><b>CE Recommendation:</b></p>
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		<p>Amend <b>COS2 Objective 4</b> as follows:</p> <p>To support the clustering of community facilities such as community centres, sports and leisure facilities, schools, childcare facilities and open spaces to create multi-purpose community <b>hubs without negatively restricting the range of services provided in any one centre.</b></p>
SD-C195-154 Tallaght Community Council	The submission requests a new SLO: "To explore the need for a dedicated community facility in the Tallaght village area given the growth in residential numbers and the planned growth in adjoining areas Broomhill, Airtown etc."	<p><b>CE Response:</b></p> <p>The phasing provisions of the Tallaght Town Centre Local Area Plan clearly set out the community centre requirements across the town centre lands.</p> <p>This is supported by policy and objectives in the Draft Plan therefore there is no requirement for an SLO.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
SD-C195-266 Christine Noonan	A submission expresses concern over amount of residential development in Clondalkin and the remainder of the County and the associated pressure put on the existing services which are already at capacity, such as doctors, dentists and schools.	<p><b>CE Response:</b></p> <p>The comments in this submission have been acknowledged and noted. A Social Infrastructure Audit for the County was carried out in the preparation of the draft Plan and has informed the policy and objectives of the draft plan.</p> <p>A Neighbourhood Approach has been applied to the County Development Plan with the plan area sub-divided in to the seven Neighbourhood areas – Citywest, Saggart, Rathcoole &amp; Newcastle; Clondalkin, Clonburris &amp; Grangeacastle; Lucan, Palmerstown &amp; Adamstown; Naas Road; Uplands Rural; Tallaght and Templeogue, Rathfarnham &amp; Walkinstown.</p> <p>The following social infrastructure facilities have been examined and standards applied to ensure alignment with projected population growth for new development areas: Primary Care</p>

		<p>Centres, Childcare Facilities, Schools, Community, Public Open Space and Parks</p> <p>The SIA has informed a summary of existing and planned community facility provision for each neighbourhood area which informs Chapter 12: <i>Our Neighbourhoods</i></p> <p>The Draft Plan supports community and social infrastructure through its policies and objectives, including those outlined below:</p> <p><b>Policy COS2 Social/Community Infrastructure'</b> Support the 'planned provision of a range of universally accessible and well connected social, community, cultural and recreational facilities, close to the communities they serve, consistent with RPO 9.14 of the RSES. (See also Chapter 5: <i>Quality Design and Healthy Placemaking</i>)'</p> <p><b>COS2 Objective 1:</b> 'To support the provision of a wide range of community facilities and to ensure that such facilities are provided in new and existing communities in tandem with housing development, with special consideration for period of review to adapt to the needs of an increasingly multi-cultured and diverse community, in accordance with the phasing requirements of Local Area Plans and Planning Schemes.'</p> <p><b>COS2 Objective 2:</b> 'To continue to work closely with the Health Service Executive, Department of Education and Skills and the relevant public bodies and state agencies to meet the necessary provision of primary care centres, childcare facilities, schools, community centres and public open space according to the standards set out in section 8.4.1 of this Plan.'</p> <p><b>COS2 Objective 3:</b> 'To protect and enhance existing community facilities, and to support the development and expansion of new and existing facilities and services, in proximity to the populations they serve, where their need is identified.'</p>
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		<p><b>COS2 Objective 4:</b> To support the clustering of community facilities such as community centres, sports and leisure facilities, schools, childcare facilities and open spaces to create multi-purpose community hubs.</p> <p>In addition, it is noted that the Draft Plan includes for a new school at Deansrath. The new development at Kilcarbery includes a community facility. The development at Clonburris SDZ provides for a phased approach with community and other facilities part of that phasing. CS7 Objective 1 states:</p> <p>To promote more intensive population and employment uses focussing on good community, civic and school facilities, good quality streets and spaces whereby existing and new neighbourhoods are knitted together alongside essential infrastructure and amenities that are required to develop sustainable communities and employment within the key urban centres, consistent with RPO 4.3.</p> <p>It is also noted that the Draft Plan includes for a Local Area Plan to be prepared for Clondalkin. That plan will facilitate public consultation and more detail for the development of Clondalkin.</p> <p><b>CE Recommendation:</b> No change to Draft Plan.</p>
<p><a href="#">SD-C195-296 Councillor Lynn McCrave</a></p>	<p>A Submission calls for the development plan to support a full audit of Community space within the county through the identification of all community space facilities and align this audit against the Demographic statistics of each electoral area so as to ensure that sufficient community facilities exist for all communities in our County.</p>	<p><b>CE Response:</b> The comments in this submission have been acknowledged and noted. As part of preparing the draft County Development Plan a Social Infrastructure Audit has been prepared .The purpose of a Social Infrastructure Audit is to examine and analyse the availability and capacity of existing social infrastructure facilities within South Dublin County to determine future requirements and make CE</p>

		<p>Recommendation:s based on anticipated growth in population and accordingly identification of where future investment is required.</p> <p>Following a social infrastructure audit carried out for the preparation of the Draft Plan, the following social infrastructure facilities have been examined and standards applied to ensure alignment with projected population growth for new development areas: Primary Care Centres, Childcare Facilities, Schools, Community, Public Open Space and Parks</p> <p>The standards applied for Community Centres were carefully examined against national and international standards and are set out in the draft Plan. However, the Draft Plan already includes an objective to assess existing community floorspace/facilities within the County as follows:</p> <p><b>COS3 Objective 5:</b>  <i>To support and facilitate the development of a Community Centre Strategy to include the assessment of existing community floorspace/facilities within the County, to identify gaps in provision and to ensure new community centres are provided in existing and new development areas having regard to the Social Infrastructure Audit carried out for the Development Plan.</i></p> <p>It is considered that no change is required as the Draft Plan already contains an objective to assess community space.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
<p>SD-C195-297 Councillor Lynn McCrave</p>	<p>A submission calls for the development plan to establish additional community facilities within the Rathfarnham Village area.</p>	<p><b>CE Response:</b></p> <p>The comments in this submission have been acknowledged and noted. The purpose of a Social Infrastructure Audit is to examine and analyse the availability and capacity of existing social infrastructure facilities within South Dublin County to determine future requirements and make CE Recommendation:s based on anticipated growth in population and accordingly identification of where future investment is required.</p>

		<p>Following a social infrastructure audit carried out for the preparation of the Draft Plan, the following social infrastructure facilities have been examined and standards applied to ensure alignment with projected population growth for new development areas: Primary Care Centres, Childcare Facilities, Schools, Community, Public Open Space and Parks</p> <p>The standards applied for Community Centres were carefully examined against national and international standards and are set out in the draft Plan. However, the Draft Plan already includes an objective to assess existing community floorspace/facilities within the County as follows:</p> <p><b>COS3 Objective 5:</b>  <i>To support and facilitate the development of a Community Centre Strategy to include the assessment of existing community floorspace/facilities within the County, to identify gaps in provision and to ensure new community centres are provided in existing and new development areas having regard to the Social Infrastructure Audit carried out for the Development Plan.</i></p> <p>As the Draft Plan already contains an objective to assess community space it is considered that additional objectives are not required for individual areas.</p> <p><b>CE Recommendation:</b>  No change to Draft Plan.</p>
<p>SD-C195-279 Ballyboden Tidy Towns Group</p>	<p>The submission requests that the Draft Plan seeks to provide additional social and community facilities for the Ballyboden area to replace the net loss in facilities the area has seen in recent times.</p>	<p><b>CE Response:</b></p> <p>The comments in this submission have been acknowledged and noted. The purpose of a Social Infrastructure Audit is to examine and analyse the availability and capacity of existing social infrastructure facilities within South Dublin County to determine future requirements and make CE Recommendation:s based on anticipated growth in population and accordingly identification of where future investment is required.</p>



		<p>Following a social infrastructure audit carried out for the preparation of the Draft Plan, the following social infrastructure facilities have been examined and standards applied to ensure alignment with projected population growth for new development areas: Primary Care Centres, Childcare Facilities, Schools, Community, Public Open Space and Parks</p> <p>The standards applied for Community Centres were carefully examined against national and international standards and are set out in the draft Plan. However, the Draft Plan already includes an objective to assess existing community floorspace/facilities within the County as follows:</p> <p><b>COS3 Objective 5:</b>  <i>To support and facilitate the development of a Community Centre Strategy to include the assessment of existing community floorspace/facilities within the County, to identify gaps in provision and to ensure new community centres are provided in existing and new development areas having regard to the Social Infrastructure Audit carried out for the Development Plan.</i></p> <p>As the Draft Plan already contains an objective to assess community space it is considered that additional objectives are not required for individual areas.</p> <p><b>CE Recommendation:</b>  No change to Draft Plan</p>
<p><a href="#">SD-C195-145 Moyville residents Association</a></p> <p><a href="#">SD-C195-167 Wanderers GAA Club</a></p> <p><a href="#">SD-C195-279 Ballyboden Tidy Towns Group</a></p>	<p>Submissions have requested that the Draft Plan seeks to provide additional social and community facilities for the Ballyboden area to replace the net loss in facilities the area has seen in recent times such as St Josephs Youth Club building and amateur Boxing Club.</p> <p>Requests that an SLO is included in the Plan to read: 'To secure the preservation and enhancement of open space/ green space within Moyville for public amenity/recreation</p>	<p><b>CE Response:</b></p> <p>The support for a school on the Stocking Avenue site is noted.</p> <p>The provision of additional social and community facilities for Ballyboden area to replace net loss of facilities from the area is specifically referenced in Policy COS4 Objective 12 which supports the provision of a dedicated sporting centre in Whitechurch Estate which could be used by local sports clubs including Whitechurch Boxing Club, Wanderers GAA Club, Ballyboden and other local clubs. Ideally it would comprise a boxing ring, changing and shower</p>

	<p>and to explore their use for biodiversity/natural heritage enhancements'.</p> <p>The submission supports the requirement for a school on the Stocking Avenue site.</p>	<p>facilities and storage facilities for local clubs. Policy COS4 SLO 2 promotes actively the provision of indoor sports facilities to meet the needs of the growing population of Knocklyon-Ballyboden and COS4 Objective 15 to provide a swimming pool with leisure facilities in the Rathfarnham/ Knocklyon/Firhouse areas.</p> <p>Further policies within the plan COS3 Objective 5 supports and facilitates the development of a Community Centre Strategy to include the assessment of existing community floorspace/facilities within the County, to identify gaps in provision and to ensure new community centres are provided in existing and new development areas having regard to the Social Infrastructure Audit carried out for the Development Plan.</p> <p>COS4 Objective 7 supports and promote communities and clubs in developing minority sports at appropriate locations within the County and COS3 Objective to investigate, where new provision is required to meet the needs of the population, the feasibility of extending existing community centres on suitable sites, where siting, layout, design, access and other planning considerations allow.</p> <p><b>'Policy COS 2 Social/Community Infrastructure-</b> Support the planned provision of a range of universally accessible and well-connected social, community, cultural and recreational facilities, close to the communities they serve, in accordance with RPO 9.14 of the RSES. (See also Chapter 5, Quality Design and Healthy Placemaking)'</p> <p>The proposed SLO for green space is noted. These areas are zoned as Open Space and managed as such. There are thousands of such spaces within the County and to have a specific SLO for individual areas is not necessary. The open space zoning objective is to 'preserve and provide for open space and recreational amenities'. There is also strong policy in the Draft Plan on public open space in section 8.7 providing for multi-functionality and</p>
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		<p>recognizing their biodiversity function in addition to their recreational function. COS5 Objective 11 states:</p> <p><i>To promote the role of parks and open spaces in conserving and restoring biodiversity and ecosystems in accordance with the objectives of the National Biodiversity Action Plan (2017-2021) and the All-Ireland Pollinator Plan 2021-2025, the Council's Biodiversity Action Plan 2020-2026 or any superseding plans. In the development of individual management plans for parks the requirements of the aforementioned biodiversity and pollinator plans will be taken into consideration and will form a part of the management requirements for the park. The development of individual management plans for parks will include consultation with local stakeholders.</i></p> <p>The Draft Plan also includes an objective to prepare a Local Area Plan for the Ballyboden area.</p> <p><b>QDP14 SLO 2:' To prepare a new Local Area Plan for Ballyboden'</b></p> <p>Having regard to the policies and objectives set out above it is considered that no change is needed to the Draft Plan</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
<b>Social Inclusion and Community Development</b>		
<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation</b>
SD-C195-23 Gary Tyrrell	This submission deals with lack of community engagement by SDCC, stating they appreciate the work done by the council yet there is lack of genuine commitment to communicate with the people of SDCC at community level from planning to implementation. Uses the example of Arnsteins Ladder of Citizen Participation as an example.	<p><b>CE Response:</b></p> <p>In all aspects of service provision the management and staff of South Dublin County Council seek to work with local communities. The Council has a 'Customer Service Action Plan and Citizen Charter' which sets out the Council's approach in this regard.</p>

	<p>Adaptation projects, such as citizen science climate readiness projects would be most welcome. Expresses wish to work with the Council to enable such projects</p>	<p>The Draft Plan has been prepared following a period of consultation which commenced on the 31st of July 2020. Pre-Draft public consultation was undertaken over an 8-week period from 31st July to 28th September 2020 which included a Strategic Issues Papers booklet, the Mayor's launch, public webinars, a social media campaign, stakeholder meetings, public meetings, printed media, virtual public consultation and briefing sessions to the elected members. A dedicated website was developed to facilitate public engagement and a submissions portal provided for online submissions.</p> <p>Notwithstanding the above the overall approach of the Council to the communications is not a matter for the County Development Plan which is a strategic land use document.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan</p>
<p>SD-C195-23 Gary Tyrrell</p>	<p>The submission welcomes the recent Killinarden Park plans for improvements, but states that without the concerted efforts of the local community, many improvements will be subject to major risk of vandalism. Collaboration with community groups is urged, to give the works at Killinarden Park every chance of success.</p> <p>This submission also uses an example of long littering and dumping along Whitestown Stream which feeds into Sean Walsh Park. The Tallaght Litter Mugs (TLM) and Dodder Action (DA) have tried to clear this area but believe the use of SDCC personnel and heavy equipment is an opportunity missed to build community bridges between SDCC and Local action groups.</p>	<p><b>CE Response:</b></p> <p>This submission is noted and acknowledged.</p> <p>In all aspects of service provision the management and staff of South Dublin County Council seeks to work with local communities. The Council has a 'Customer Service Action Plan and Citizen Charter' which sets out the Council's approach in this regard. The Council also operates a customer service system which allows the public to directly access the various council departments. In regard to the issues of vandalism at Killinarden, the community raised this issue during the consultation stage and the Council gratefully acknowledge the input and support of the local community in the development of the improvement plans for Killinarden Park to date. SDCC will continue to engage with the community in the roll out of the plans to ensure the park plans have every chance of success.</p> <p>The concerns expressed in the submission regarding littering are acknowledged. However, historically SDCC has employed and</p>

		<p>continues to employ considerable resources in managing litter and also works with community groups and environmental groups in assisting in these efforts. In 2021 SDCC published a <b>litter</b> management plan which aims to address litter management across a range of environments. The littering issue raised in this submission is a matter for the Litter Management Plan.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<p><a href="#">SD-C195-187 SDCSP</a></p>	<p>The South Dublin County Sports Partnership seeks to:</p> <ul style="list-style-type: none"> <li>- amend section 8.3.1 to include reference to the SDCSP Strategic Plan 2017-2022. The aim of the Sports Partnership is to support increased participation in sport and health enhancing physical activity by the community of South Dublin County, regardless of their background, age or ability. The strategy focuses on 3 key action areas; the education of coaches and sport leaders, the delivery of activities to the community, especially the more disadvantaged groups of people, and the provision of information and support clubs, schools, community organisation and the general public.</li> <li>- amend COS 1 Objective 3 to include: 'South Dublin County Sports Partnership Strategic Plan 2017-2022'.</li> </ul>	<p><b>CE Response:</b></p> <p>This submission has been noted and is acknowledged.</p> <p>There is no objection to the addition proposed.</p> <p><b>COS1 Objective 3 states as follows:</b></p> <p>'To support and facilitate the implementation of local plans and programmes (and any superseding documents) with a social inclusion and community development focus including:</p> <ul style="list-style-type: none"> <li>- Social Inclusion and Community Activation Programme (2018-2022)</li> <li>- South Dublin County Council Integration Strategy (2019-2023) – A More Inclusive County</li> <li>- The South Dublin County Traveller Accommodation Programme (2019-2024)</li> <li>- South Dublin Disability Accommodation Strategy</li> <li>- South Dublin Age Friendly Strategy (2020- 2024)</li> <li>- A Strategy for a Healthy South Dublin (2019-2022)'</li> </ul> <p><b>CE Recommendation:</b></p> <p><b>Amend Section 8.3.1 to include the South Dublin Sports Partnership as a bullet point with the wording:</b></p> <p>The aim of the Sports Partnership is to support increased participation in sport and health enhancing physical activity by the community of South Dublin County, regardless of their background,</p>

		<p>age or ability. The strategy focuses on 3 key action areas; the education of coaches and sport leaders, the delivery of activities to the community, especially the more disadvantaged groups of people, and the provision of information and support clubs, schools, community organisation and the general public.</p> <p><b>And amend COS1 Objective 3 to read as follows</b></p> <p>To support and facilitate the implementation of local plans and programmes (and any superseding documents) with a social inclusion and community development focus including:</p> <ul style="list-style-type: none"> <li>-Social Inclusion and Community Activation Programme (2018-2022)</li> <li>South Dublin County Council Integration Strategy (2019-2023) – A More Inclusive County</li> <li>-The South Dublin County Traveller Accommodation Programme (2019-2024)</li> <li>-South Dublin Disability Accommodation Strategy</li> <li>-South Dublin Age Friendly Strategy (2020- 2024)</li> <li>-A Strategy for a Healthy South Dublin (2019-2022)</li> <li><b>-South Dublin County Sports Partnership Strategic Plan 2017-2022’.</b></li> </ul>
<p>SD-C195-154 Tallaght Community Council</p>	<p>The submission requires additional wording to COS1 Objective 4 to include “changing rooms”.</p> <p>The submission also queries if the audit of community facilities include community centres owned by private companies limited by guarantee.</p>	<p><b>CE Response:</b></p> <p>This submission has been noted.</p> <p><b>COS1 Objective 4</b> states as follows;</p> <p>‘To support the improvement, maintenance, upgrade and refurbishment of existing community based facilities within the County to meet current and future needs’.</p> <p>The submission requests the addition of ‘changing rooms’ into the objective. This is considered reasonable.</p>

		<p>An assessment of community centres will inform the development of a Community Centre Strategy as outlined in <b>COS3 Objective 5:</b>  <i>To support and facilitate the development of a Community Centre Strategy to include the assessment of existing community floorspace/facilities within the County, to identify gaps in provision and to ensure new community centres are provided in existing and new development areas having regard to the Social Infrastructure Audit carried out for the Development Plan</i></p> <p>It will involve an assessment of existing community floorspace/facilities which are Council operated or controlled.</p> <p><b>CE Recommendation:</b></p> <p>Amend COS1 Objective 4 to read:</p> <p>To support the improvement, maintenance, upgrade and refurbishment of existing community based facilities <b>and changing rooms</b> within the County to meet current and future needs'</p>
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<b>Community Centres</b>		
<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation</b>
<a href="#">SD-C195-222 Tallaght Community Council</a>	<p>This submission looks for the inclusion of an SLO related to all community centres applying for and receiving SDCC grants should outline what intergenerational facilities, teen facilities and local registered groups they engage with and directly support through their premises and activity programmes each year. Centres should be encouraged to extend their programmes meaningfully to cater for all ages in their community.</p> <p>Submission also looks for an additional SLO requesting clarity on Tymon Bawn extension of services as the local</p>	<p><b>CE Response:</b></p> <p>Policy COS3 'Community Centres' of the Draft Plan 2022-2028 relates specially to ensuring that communities across the county have access to multifunctional and intergenerational community centres that provide a focal point for community activities. This is further set out in COS3 Objective 4:</p> <p><i>'To ensure that community buildings are multi-functional and adaptable, can be used by all age cohorts (intergenerational), providing for indoor and supporting outdoor use e.g. café seating</i></p>

	<p>community have a poor record of support with the Board of Directors of this privately owned centre. No teen facilities and no support for local meetings, access to toilet facilities to sports teams.</p>	<p>areas, and are accessible to as many different users as possible including our teens and young people’, and</p> <p>COS2 Objective 5: ‘To promote accessible and inclusive social infrastructure for a range of users by adopting a universal design approach where feasible and to provide for an age friendly society in which people of all ages can live full, active, valued and healthy lives, consistent with RPO 9.12 and RPO 9.13 of the RSES and having regard to Building for Everyone: A Universal Design Approach – Planning and Policy’ (2012)’, both objectives promote and ensure accessibility to multifunctional and adaptable community centres.</p> <p>Issues of funding and management of facilities are outside of the remit of the County Development Plan which is a strategic landuse policy document. Matters on the management of individual community centres should be directed to the relevant department of the Council.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<p>SD-C195-254 Deputy Emer Higgins</p>	<p>The submission welcomes the vision of the Draft Plan and demands that housing be provided where transport provision and social infrastructure can be delivered. As such, the submission requests that the following community centres be provided:Community centres in Saggart, Clondalkin and Clonburris.</p>	<p><b>CE Response:</b></p> <p>The Draft Plan through the compact growth approach links the provision of social infrastructure with housing and public transport links. The Draft Plan also seeks to extend existing facilities where needed and feasible. COS3 Objective 1 states as follows ‘To investigate, where new provision is required to meet the needs of the population, the feasibility of extending existing community centres on suitable sites, where siting, layout, design, access and other planning considerations allow.’</p> <p>Part 8 planning has been approved for the conservation, renovation and extension of St. Mary’s Schoolhouse, Saggart for use as a</p>



		<p>community centre with a total floor area of 610sqm. It is also noted that the Council is advancing the development of a large community centre in Fortunestown.</p> <p>Planning has been approved for a community centre facility in Kilcarberry and Orchard Lane in Clondalkin.</p> <p>Provision has been made in the 3-year Capital Programme for an extension to Knockmitten community centre, Clondalkin.</p> <p>The Clonburriss SDZ scheme provide for community facilities in line with development.</p> <p>Having regard to the above, provision for community centres is being advanced in all of the areas referenced.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
SD-C195-263 Smashing Times International Centre for the Arts and Equality	A submission welcomes objective COS3 Objective 1 to investigate where provision is required to meet the needs of the population, the feasibility of extending existing community centres on suitable sites, where siting, layout, design, access and other planning considerations allow.	<p><b>CE Response:</b></p> <p>Comments in relation to COS3 Objective 1 are noted and welcomed.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>

Sports Facilities and Centres		
Submission No.	Submission Summary	CE response and recommendation
SD-C195-11 Proinsias Mac Fhlannchadha	The wording as per COS4 Objective 10 should be amended to include BMX, skate park and mountain bike track also.	<p><b>CE Response:</b></p> <p>COS4 Objective 10 of the Draft Plan 2022-2028 makes provision to support and where possible identify a location for the development</p>

		<p>of a motocross track and support any applications for national funding where available.</p> <p>The provision of BMX and skate park falls under the scope of a Sports Plan for the County, the Draft Development Plan has included COS4 Objective 3: 'To support the preparation of a Sports Plan for the County, where this provides for the sustainable development of sports facilities, in accordance with the National Sports Policy (2018-2027).' There are several objectives within the Draft Plan to support the provision of such facilities, see relevant objectives stated below.</p> <p>COS4 Objective 1 'To promote the provision and management of high-quality, multi-functional, sport and recreational infrastructure across the County to meet existing and future needs, to include sports hubs and multi-sport astro-pitches, in accordance with the South Dublin County Council Sports Pitch Strategy (2020), the National Sports Policy (2018-2027) and the aims of the South Dublin County Sports Partnership, consistent with RPO 9.15 of the RSES.'</p> <p>COS4 Objective 5 'To support the provision of formal and informal play areas with appropriate equipment and facilities, incorporating nature-based play opportunities across the County, ensuring that the needs of differing age groups and abilities are accommodated.'</p> <p>COS4 Objective 6 'To facilitate the provision of appropriately scaled children's play facilities and teen space facilities at suitable locations across the County within existing and new residential development.'</p> <p>COS4 Objective 7: 'To support and promote communities and clubs in developing minority sports at appropriate locations within the County.'</p> <p>It is also noted that the Council is preparing a Parks and Open Space Strategy which will examine the needs of the population. A user survey was undertaken generating significant interest and CE</p>
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		<p>Response:s. It is considered that the objectives contained in the Draft Plan, and the more detailed examination of facilities to be included in the Council's Parks on foot of public feedback, is sufficient to address the issues in the submission. The need to list specific uses as part of this objective is unnecessary.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan</p>
<p>SD-C195-11 Proinsias Mac Fhlannchadha</p>	<p>Regarding COS4 Objective 11, there is no requirement to single out an individual sport in this objective particularly given the poor participation rates in rugby. This wording also goes against COS4 Objective 1 for multi-functional facilities.</p>	<p><b>CE Response:</b></p> <p><b>COS4 Objective 11</b> states as follows;  'To facilitate as far as possible all sports played by the citizens of South Dublin County including rugby, recognising the growing numbers taking part in the sport and the particular requirements of the game in terms of pitches.</p> <p>The objective as worded is considered reasonable as it looks to facilitate all sports played by the citizens of South Dublin <b>including</b> rugby. It is not specific to rugby.</p> <p>COS4 Objective 1 states: 'To promote the provision and management of high-quality, multi-functional, sport and recreational infrastructure across the County to meet existing and future needs, to include sports hubs and multi-sport astro-pitches, in accordance with the South Dublin County Council Sports Pitch Strategy (2020), the National Sports Policy (2018-2027) and the aims of the South Dublin County Sports Partnership, consistent with RPO 9.15 of the RSES.'</p> <p>It is not considered that there is any conflict in these objectives.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan</p>

<p>SD-C195-11 Proinsias Mac Fhlannchadha</p>	<p>The sporting facilities at community centres and public parks are very much focused on organised sports (GAA/ Soccer). Greater consideration needs to be given to these informal facilities – such as 5 a side pitches, teqball tables, one on one basketball, etc. – where there is a demand for same.</p>	<p><b>CE Response:</b></p> <p>Informal facilities for unstructured physical activity such as all-weather pitches, MUGAS, astro-pitches, basketball courts, teqball football tables, calisthenics area and parkour facilities are being developed through the County Teenspace Strategy in various locations throughout the county.</p> <p>The County Teenspace Strategy is supported in the Draft Plan under <b>COS5 Objective 3:</b> To support the implementation and expansion of the Council's <i>TeenSpace Programme</i> (2021) and the implementation of the <i>Sports Pitch Strategy</i> (2020) or (any superseding documents).</p> <p>It is also noted that the Council is preparing a Parks and Open Space Strategy which will examine the needs of the population. A user survey was undertaken generating significant interest and CE Response:s. It is considered that the objectives contained in the Draft Plan, and the more detailed examination of facilities to be included in the Council's Parks on foot of public feedback will also address the issues raised. The Parks and Open Space Strategy is supported in the Draft Plan in <b>COS5 Objective 2:</b> To support the implementation of South Dublin County Parks and Open Space Strategy and to ensure that the provision, upgrade, design, and maintenance of public open space is in accordance with the Strategy.</p> <p>Having regard to the above it is considered that no change is required to the Draft Plan.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<p>SD-C195-84 Edmondstown Golf Club</p>	<p>The submission wishes to acknowledge the inclusion of COS4 SLO5 in the Draft Plan relating to the future development surrounding Edmondstown Golf Club to take cognisance of its boundary and protection of amenity and</p>	<p><b>CE Response:</b></p> <p>The welcoming of COS4 SLO5 is noted.</p> <p><b>COS4 SLO 5:</b></p>

	function of the Golf Course. It seeks to retain this SLO in the new Plan.	To ensure that any future development has regard to the boundary with and protection of the amenity and function of Edmondstown Golf Course.  <b>CE Recommendation:</b>  No Change to Draft Plan
SD-C195-89 Stephen Heaney  SD-C195-36 Niall Mahon  SD-C195-40 Colin Morrison  SD-C195-30 Laura O'Reilly  SD-C195-37 Michael Corrigan  SD-C195-38 Thomas Leigh  SD-C195-88 Emma Louise Doyle  SD-C195-91 Tallaght RFC	<p>A number of submissions welcomes objectives in the Draft Plan relating to sporting facilities, particularly rugby, including COS4 Objective 11, COS4 Objective 17 and COS4 Objective 18. These objectives would allow Tallaght Rugby Club to develop as a club and develop players from youth level whilst also serving the people of Tallaght and the surrounding areas.</p> <p>A number of submissions have indicated that Tallaght Rugby Club has grown to significantly in the past 20 years and is still growing. However, Tallaght Rugby Club's growth has been severely impacted and restricted by the lack of facilities such as its own training and playing pitches and club house facilities and urge the Council to work with the Club to obtain improved facilities to serve the increasing numbers participating in the sport. The lack of facilities have resulted in players leaving the club to join alternative clubs with better facilities.</p> <p>It has also been highlighted that the existing pitch is in substandard condition in terms of the uneven ground level and associated impact of antisocial behaviour such as scramblers, burnt out cars and littering on the pitch and vandalism of the clubs container.</p>	<p><b>CE Response:</b></p> <p>The Sports Pitch Strategy for the South Dublin County Council provides an evidence base and set of CE Recommendation:s for outdoor sports facility development and rugby was one such sport that was assessed. It is noted that COS4 Objective 1 promotes the provision and management of high-quality, multi-functional, sport and recreational infrastructure across the County to meet existing and future needs, to include sports hubs and multi-sport astro-pitches, in accordance with the South Dublin County Council Sports Pitch Strategy (2020), the National Sports Policy (2018-2027) and the aims of the South Dublin County Sports Partnership, consistent with RPO 9.15 of the RSES.</p> <p>Policy COS4 Objective 11 facilitates as far as possible all sports played by the citizens of South Dublin County including rugby, recognising the growing numbers taking part in the sport and the particular requirements of the game in terms of pitches. In addition, COS4 Objective 17 to ensure that any sports club established for over 5 years in the community be provided with proper facilities (changing rooms/ toilets) to ensure they can continue to operate and grow within our community; and COS4 Objective 18 to make available suitable unused Council-owned brownfield sites and buildings to sport, arts and community groups on a temporary or long-term lease basis, where feasible.</p> <p>The development Plan is a strategic spatial land-use plan for the County and as such has provided polices and objectives to support, facilitate and promote sports facilities. However, the use of</p>

<p>SD-C195-111 Jeanette Moonan</p>		<p>public pitches for clubs such as Tallaght Rugby Club is allocated and managed through the Sports Pitch Strategy for the County. This is an operational management function of the Public Realm Department of the Council. Therefore, the identification of specific sites or allocation of premises for such uses or named clubs, and the management of the pitches themselves, is beyond the remit of the county development Plan.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
<p>SD-C195-93 Swim Ireland</p>	<p>The submission from Swim Ireland highlights that they delivery national strategic aquatic objectives such as ‘Get Ireland Swimming’. That swimming is a recreational priority facility as it is accessible to all ages, genders, and abilities and as such welcome and fully support the inclusion of a swimming pool in Rathfarnham, Knocklyon and Firhouse areas, however, suggest that an amendment is made to the objective to provide for consultation with sports bodies at design stage. The submission would also welcome an opportunity to work with the Council to provide opportunities for Open Water Swimming in the County.</p> <p>The submission welcomes the inclusion of National Governing Bodies (NGB) objective as the NGB’s are delivery agents of National Sports Policy. It suggests that NGBs be recognised as key collaborators by the Council and finally the submission identifies that there is no reference to swimming in the South Dublin County Sports Partnership Strategic Plan 2017-2022.</p>	<p><b>CE Response:</b></p> <p>The submission welcomes and fully supports the inclusion of COS4 Objective 15 to provide a swimming pool in the Rathfarnham, Knocklyon and Firhouse area and inclusion of National Governing Bodies (NGB) objective. The Development Plan is a strategic spatial land-use plan that can provide support via specific objectives contained within the Plan. However, developing opportunities for open water swimming in the County are more appropriately detailed within the South Dublin County Sports Partnership Strategic Plan 2017-2022. The County Sports Partnership is supported in <b>COS4 Objective 1:</b></p> <p><i>To promote the provision and management of high-quality, multi-functional, sport and recreational infrastructure across the County to meet existing and future needs, to include sports hubs and multi-sport astro-pitches, in accordance with the South Dublin County Council Sports Pitch Strategy (2020), the National Sports Policy (2018-2027) and the aims of the South Dublin County Sports Partnership, consistent with RPO 9.15 of the RSES</i></p> <p>However, having regard to the request in the submission, it is considered that COS4 Objective 1 could be amended to provide for consultation.</p>

		<p><b>CE Recommendation:</b></p> <p>Amend COS4 Objective 1 to read:</p> <p><i>To promote the provision and management of high-quality, multi-functional, sport and recreational infrastructure across the County, <b>in consultation with relevant stakeholders</b>, to meet existing and future needs, to include sports hubs and multi-sport astro-pitches, in accordance with the South Dublin County Council Sports Pitch Strategy (2020), the National Sports Policy (2018-2027) and the aims of the South Dublin County Sports Partnership, consistent with RPO 9.15 of the RSES</i></p>
SD-C195-105 Adele Geoghegan	The submission suggests the provision of bike rental and repair points in Corkagh Park, as there is an existing cycling culture in Clondalkin which should be fostered and promoted. Increased cycling would reduce traffic congestion and reduce carbon footprint and pollution in the area.	<p><b>CE Response:</b></p> <p>The Council is committed to continued improvement of quality and provision of recreation facilities through implementation of the Council's Parks and Open Spaces Strategy.</p> <p>The Corkagh Park Masterplan and the Parks and Open Space Strategy will investigate bike rental and bike repair points within the park and such facilities are an operational matter for the Public Realm Department of the Council.</p> <p>The Development Plan as a strategic spatial land-use plan provides objectives such as COS5 Objective 13 'To ensure that parks and open spaces provide for a wide range of recreational and amenity activities that are easily accessible to all in the community, irrespective of age or ability.'</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
SD-C195-127 David Hughes	A submission highlights that sports is a great resource for both young and old and should be inclusive. It suggests that what is required in SDCC, especially in light of Covid and	<p><b>CE Response:</b></p>

	<p>the post-Covid environment is an all-weather running track, long jump etc in Tymon Park, close to a clubhouse for safety purposes which both schools and the general community could use. Athletics deserves facilities, as some kids and adults don't all want to play team ball games and the land is available at Tymon with the appropriate zoning.</p>	<p>This submission requests the provision of an all-weather running track, long jump etc in Tymon Park, close to a clubhouse for safety purposes which both schools and the general community could use. The delivery of the Parks and Open Space Strategy 2021 will examine the facilities in place in individual parks and make CE Recommendation:s in that regard. The Council currently have an athletics track under construction at Mt Carmel that will increase the existing from a constrained 3 lane to an 8 lane facility.</p> <p>Tymon Park has a number of constraints in terms of space and the provision of a running track would have to be considered in line with space available, provision of existing facilities, environmental impact etc.</p> <p><b>COS4 Objective 16:</b> To support the provision of athletics facilities in the County examining the potential for their location within Regional Parks and other locations in accordance with <i>SDCC's Sports Pitch Strategy 2020</i> and the development of the County Sports Plan and Parks and Open Space Strategy.</p> <p>Having regard to the objective above it is considered that there is sufficient policy support for the issue raised.</p> <p><b>CE Recommendation:</b> No change to Draft Plan</p>
<p><a href="#">SD-C195-137 Declan Hanley</a></p>	<p>The submission wishes the provision of "Hurling walls" in SDCC's parks to encourage the playing of hurling in the county.</p>	<p><b>CE Response:</b></p> <p>There are a number of objectives in the Draft Plan to support a range of uses within Parks, these include:</p> <p>COS4 Objective 3: To support the preparation of a Sports Plan for the County, where this provides for the sustainable development of sports facilities, in accordance with the National Sports Policy (2018-2027).</p> <p>COS4 Objective 1: 'To promote the provision and management of high-quality, multi-functional, sport and recreational infrastructure</p>



		<p>across the County to meet existing and future needs, to include sports hubs and multi-sport astro-pitches, in accordance with the South Dublin County Council Sports Pitch Strategy (2020), the National Sports Policy (2018-2027) and the aims of the South Dublin County Sports Partnership, consistent with RPO 9.15 of the RSES.' The detail requested by this submission is outside of the remit of the County Development Plan which is a strategic landuse policy document.</p> <p>Hurling walls are being facilitated in the Council's Parks, for instance a hurling wall has been constructed in Griffeen Park in recent times.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
<p>SD-C195-212 Jim Brogan Planning and Development Consultant</p> <p>SD-C195-167 Wanderers GAA Club</p>	<p>Submission raises the following points in relation to sports facilities for GAA development throughout SDCC:</p> <ul style="list-style-type: none"> <li>- Submission raises concerns in relation to the provision of pitches of adequate size for playing competitive field games arising where the policy of increased densification within a more compact development model is implemented, presenting problems where residential development is to be included on brownfield regeneration schemes where existing areas of open space are limited.</li> <li>- Submission looks for further objectives to the draft CDP committing SDCC to the maximisation of the use of South Dublin's active recreational assets (public and private).</li> <li>- Submission would be supportive of any measures intended to optimise the operational capacity of playing and ancillary facilities to adequately cater for the needs of the population, which is rapidly growing in a GAA context.</li> </ul>	<p><b>CE Response:</b></p> <p>The Draft Plan contains a number of objectives to facilitate sports pitches and related facilities.</p> <p><i>COS 4 Objective 1 states 'To promote the provision and management of high-quality, multi-functional, sport and recreational infrastructure across the County to meet existing and future needs, to include sports hubs and multi-sport astro-pitches, in accordance with the South Dublin County Council Sports Pitch Strategy (2020), the National Sports Policy (2018-2027) and the aims of the South Dublin County Sports Partnership, consistent with RPO 9.15 of the RSES.' And</i></p> <p><b>COS4 Objective 11:</b></p> <p>To facilitate as far as possible all sports played by the citizens of South Dublin County including rugby, recognising the growing numbers taking part in the sport and the particular requirements of the game in terms of pitches</p>

	<ul style="list-style-type: none"> <li>- Submission looks for a policy statement be added to the appropriate section of the Draft CDP, which look for commitments from SDCC regarding the promotion and facilitating the upgrading of existing pitch facilities in terms of the quality of their surfaces, the effectiveness of their drainage arrangement and their overall maintenance.</li> <li>- Submission looks for where rehabilitation programmes for playing pitches within public parks are being embarked on, the CDP should include specific provisions providing for engagement at the commencement stage of the process with the local stakeholders.</li> <li>- Submission looks for policy statements regarding the improvement and enhancement of existing facilities, where flood light systems can be introduced. Regarding the enhancement of existing facilities, attention should be focused on the provision and upgrading of essential ancillary facilities such as dressing rooms.</li> <li>- Submission looks for the possibility of developing all-weather playing pitches and siting smaller scale facilities of this type within residential areas.</li> <li>- Submission looks for consultation to take place between the Council and prospective stakeholders to ensure that their design in terms of their area, configuration, design and layout are adequate to facilitate their use.</li> <li>- Submission states that on existing lands where playing pitches are the established use, a policy statement should be included against the development of such lands unless proximate alternatives with significant upgrade in the standard of facilities can be provided.</li> </ul>	<p>The detail of playing pitches are matters for the Council's Sport Pitch Strategy (2020) and the Public Realm Department of the Council.</p> <p><b>CE Recommendation:</b></p> <p>No Change to Draft Plan</p>
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	<p>- Submission notes that neighbourhood Community Infrastructure Audits are proposed as part of the CDP process, with one of the areas of focus should be how their use can be maximised through the application of the policies advocated in this submission.</p> <p>A submission from wanderer's GAA club gives a historical background on the establishment of the club and subsequently calls for more playing pitches to be provided for match and training purposes.</p>	
SD-C195-187 SDCSP	<p>The South Dublin County Sports Partnership submission seeks to include a new objective after COS4 Objective 3 to read – ‘to facilitate the WHO Global Action Plan on Physical Activity 2018-2030 through the development of the Active Dublin Initiative, in partnership with the relevant authorities and stakeholders’.</p> <p>The Global Action Plan on Physical Activity 2018-2030 is a framework of policy actions to increase physical activity at all levels. Stemming from this comes the Active Dublin initiative which is coordinated by Sport Ireland and South Dublin Co. Sports Partnership along with all the Dublin Local authorities with remit for play, recreation and physical activity in coordination with external stakeholders such as PPN, HSE, Tallaght hospital and DDLETB.</p>	<p><b>CE Response:</b></p> <p>The Draft Plan supports the activities of the South Dublin County Sports Partnership. The initiative referred to in this submission is managed in South Dublin by the Sports Partnership which is supported by the provisions of the Plan. Therefore no change to the Draft Plan is recommended.</p> <p><i>COS 4 Objective 1 states ‘To promote the provision and management of high-quality, multi-functional, sport and recreational infrastructure across the County to meet existing and future needs, to include sports hubs and multi-sport astro-pitches, in accordance with the South Dublin County Council Sports Pitch Strategy (2020), the National Sports Policy (2018-2027) and the aims of the South Dublin County Sports Partnership, consistent with RPO 9.15 of the RSES.’</i></p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
SD-C195-52 Edward Fox	<p>The submission supports Objective COS4 SLO5 which seeks ‘to ensure that any future development has regard to the boundary with and protection of the amenity and function of Edmondstown Golf Course.’</p>	<p><b>CE Response:</b></p> <p>It is noted that this submission supports Objective COS4 SLO5 which seeks to ensure that any future development has regard to the boundary with and protection of the amenity and function of Edmondstown Golf Course.</p>

		<p><b>COS4 SLO 5:</b> To ensure that any future development has regard to the boundary with and protection of the amenity and function of Edmondstown Golf Course.</p> <p><b>CE Recommendation:</b> No change to Draft Plan.</p>
<p>SD-C195-154 Tallaght Community Council</p>	<p>The submission requests that the following 2 no. SLOs be included:</p> <p>"To explore the use of the Dodder Valley sports pavilion in Old Bawn by Tallaght Rugby in full or partial basis."</p> <p>"To explore the option of converting a soccer pitch in Dodder valley close to the new pavilion to a rugby pitch to support Tallaght Rugby Club and their members to maintain and grow their club and rugby in Tallaght."</p>	<p><b>CE Response:</b></p> <p>The Sports Pitch Strategy for the South Dublin County Council provides an evidence base and set of CE Recommendation:s for outdoor sports facility development and rugby was one such sport that was assessed. It is noted that COS4 Objective 1 promotes the provision and management of high-quality, multi-functional, sport and recreational infrastructure across the County to meet existing and future needs, to include sports hubs and multi-sport astro-pitches, in accordance with the South Dublin County Council Sports Pitch Strategy (2020), the National Sports Policy (2018-2027) and the aims of the South Dublin County Sports Partnership, consistent with RPO 9.15 of the RSES.</p> <p>Policy COS4 Objective 11 facilitates as far as possible all sports played by the citizens of South Dublin County including rugby, recognising the growing numbers taking part in the sport and the particular requirements of the game in terms of pitches. In addition, Policy COS4 Objective 3 supports the preparation of a Sports Plan for the County, where this provides for the sustainable development of sports facilities, in accordance with the National Sports Policy (2018-2027).</p> <p>The use of Dodder Valley Sports Pavilion in Old Bawn by Tallaght Rugby Club will depend on the pitch allocation within the Sports Pitch Strategy and the allocation and management of county</p>

		<p>pitches are an operational management function of public realm administration within the Council.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
SD-C195-122 The King's Hospital School	<p>The submission relates to The King's Hospital School, located on a 34ha campus in Palmerstown, Dublin 20.</p> <p>The submission details that the current Development Plan (2016-2022) Map Sheet 2 outlines both the academic buildings and external sports pitches at the campus, however, the draft Plan</p> <p>Map Sheet 2 removes the outline of the main sports pitches at The King's Hospital School campus.</p> <p>The submission highlights that the current Development Plan map provides important confirmation of the formal sporting component at the campus and it confirms that the area to the west of the educational buildings is not excess or unused green space.</p> <p>The submission adds that the Development Plan mapping is a key component for assessing planning applications and for informing external third parties and that therefore, it is important that the use of these lands is not misconstrued.</p> <p>The submission requests that the outline of the sporting pitches is reintroduced to Map Sheet 2.</p>	<p><b>CE Response:</b></p> <p>There is no objection to the mapping of existing pitches at this location on the County Development Plan maps.</p> <p><b>CE Recommendation:</b></p> <p>Amend the Draft Plan maps to provide for further detail to outline playing pitches and other delineations as part of the most recent ordnance survey mapping</p>
SD-C195-122 The King's Hospital School	<p>The submission states that the need to support improvements to school and sporting facilities is clearly set out in the draft Plan and that the submission supports for the following objectives:</p>	<p><b>CE Response:</b></p> <p><b>Policy COS4: Sports Facilities and Centres</b> relates to the provision of sporting facilities across the County. The objectives relate to this policy.</p> <p>'Ensure that all communities are supported by a range of sporting facilities that are fit for purpose, accessible and adaptable.'</p>

	<ul style="list-style-type: none"> <li>• COS4 Objective 2</li> <li>• COS4 Objective 3</li> <li>• COS4 Objective 8</li> <li>• COS4 Objective 9</li> <li>• COS4 Objective 11</li> <li>• COS8 Objective 2</li> <li>• COS8 Objective 4</li> <li>• COS8 Objective 5</li> <li>• COS8 Objective 9</li> </ul>	<p>Support for the objectives in the Draft Plan is noted.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
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Parks and Public Open Space		
Submission No.	Submission Summary	CE response and recommendation
<a href="#">SD-C195-8 Lisa A Lowry</a>	<p>The submission highlights that the existing green space in Westbrook Lawns estate is not maintained and has an uneven ground level making it difficult for certain uses such as sports.</p>	<p><b>CE Response:</b></p> <p>It is considered that this issue is specific to a particular area and is an operational matter that is better addressed by the Public Realm Department of the Council should the green area referred to be taken in charge. In this context COS 5 Objective 2 is noted.</p> <p>COS 5 Objective 2: To support the implementation of South Dublin County Parks and Open Space Strategy and to ensure that the provision, upgrade, design, and maintenance of public open space is in accordance with the Strategy.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>

<p>SD-C195-19 Knocklyon Network</p>	<p>Submission seeks the enhancement of the Dodder Valley Park and Greenway by considerable tree planting at the right time, so as not to be lost to drought from dry summers.</p> <p>Submission seeks the provision of ponds in Dodder Valley Park by exploiting some of the streams that feed into it along its journey through our county, particularly in the Cherryfield or Mount Carmel section.</p>	<p><b>CE Response:</b></p> <p>The ongoing management of the Dodder Valley Park is a matter for the Public Realm Department of the Council. The detail suggested is outside of the remit of the County Development Plan which is a strategic landuse policy document.</p> <p>However, it is noted that the Draft Plan supports additional tree cover in the County under GI5 Objective 6:</p> <p><i>To provide more tree cover across the county, in particular to areas that are lacking trees.</i></p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<p>SD-C195-77 NIALl BYRNE</p> <p>SD-C195-111 Jeanette Moonan</p> <p>SD-C195-145 Moyville residents Association</p> <p>SD-C195-167 Wanderers GAA Club</p> <p>SD-C195-249 Bairbre Brennan</p>	<p>Submissions express that Open Space/Green Space is a valuable community, recreational and environmental resource and should be protected and retained. Open Space should not be developed on and that 'Residential' should be removed as an Open for Consideration use on lands zoned Open Space 'OS'.</p>	<p><b>CE Response:</b></p> <p><i>The provisions of H3 Objective 4 qualify the provision which provides for residential development on lands zoned for 'open space' uses 'OS'.</i></p> <p><i>'To support community led housing developments for older people and social and Council affordable housing in established areas on lands designated with Zoning Objective "OS" (To preserve and provide for open space and recreational amenities), only where the quality and quantum of remaining public open spaces is deemed to be adequate and the amenities of the area are preserved.'</i></p> <p>It is noted that in South Dublin there has been a legacy of older Council estates in particular, where large areas of public open space were provided. However, in some instances these open spaces are not functioning as they should and would not meet standards of multi-functionality and security, including passive surveillance, that would be best practice today. In light of this, and in the interests of compact growth and better layout and design,</p>

		<p>there are times when open space is more efficiently used for housing.</p> <p>H3 Objective 4 stipulates that “<b>only where the quality and quantum of remaining public open spaces is deemed to be adequate, and the amenities of the area are preserved</b>” [EMPHASIS ADDED] will housing developments for older people and social and Council affordable housing in established areas on lands designated with Zoning Objective “OS” be supported. It is noted that a footnote is proposed to the zoning matrix table in the CE Response: to the OPR clarifying that residential development for older people and social and Council affordable housing only will be considered where the quantum of remaining public open spaces is deemed adequate in line with the objective.</p> <p>In addition to the above it should be noted that the Draft Plan supports a hierarchy of multi-functional, accessible parks and public open spaces across the County in line with Table 8.1, based on existing populations and planned growth in accordance with the overall standard of 2.4ha per 1,000 population. COS5 Objective 1 refers to such provisions.</p> <p>Furthermore, as per Section 8.7.1 of the Draft Plan and the ‘Principles Guiding Public Open Space Provision’, the Parks and Open Space Strategy 2021 – which is currently in development – will provide the basis for the upgrade, provision, management and maintenance of publicly managed parks and open spaces, complementing the Draft Plan policies and objectives relating to Parks and Public Open Space (Section 8.7) and the Green Infrastructure Strategy (Chapter 4).</p>
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		<p>Having regard to the above it is not considered necessary to amend the Draft Plan other than as set out in the CE Response: to the OPR's submission referenced above.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p>SD-C195-100 Niamh Geoghegan</p> <p>SD-C195-103 Daniel Rattigan</p> <p>SD-C195-104 Megan O' Malley</p> <p>SD-C195-106 Ewelina Pawlik</p> <p>SD-C195-111 Jeanette Moonan</p> <p>SD-C195-110 Lisa Sinnott</p> <p>SD-C195-116 Fionn O' Neill</p>	<p>A number of submissions express objections to the green open space area adjacent to The Dale Belgard, Heights up to the Belgard Community Centre being included as part of the Cookstown Boundary of the Local Development Plan (LAP). The submissions highlight that this green space is used by all members of the community for recreation purposes and includes several large mature trees which are 40+ years old and therefore the green space should not be included in any future plans for development. The trees are not being looked after by the Council and a submission considers that this is sabotage just to build more houses. Some submissions call for this green space to be removed from within the LAP. Some submissions are opposed to any future development of the site of the Belgard community centre as this is the hub of social integration for the community. One submission has further highlighted that the green space provides access to the local shops and Luas as wants to know why this area has been included in this plan and for what reason. A submission expresses a concern of the lack of consultation with the residents association about including the green area adjacent to The Dale within the LAP boundary for Cookstown area.</p> <p>Additional submissions have expressed concerns regarding the proposal of rezoning the valuable green space which may give rise to increased traffic impacts if developed in the future and that this piece of land has been designated as open space since Belgard Heights was built 50 years ago and that</p>	<p><b>CE Response:</b></p> <p>The open space lands at 'the Dale', Belgard Heights are currently zoned OS ' to preserve and provide for open space and recreational amenities'. There are no proposals to re-zone these lands as part of the review of the South Dublin County Development Plan 2022-2028. These lands are currently heavily used by the local community in Belgard Heights and the Dale in particular for amenity purposes, this area also provides direct pedestrian and cycling access to the Luas Line and public transport on the Belgard Road as well as shops and other services on the Belgard Road. As noted in submissions the lands are home to several mature trees contributing to the overall amenity of the area. This open space performs a number of valuable functions.</p> <p>While the open space is included within the boundary of the Tallaght LAP it is identified as open space. Therefore, there is no intention in the LAP to develop the lands. The designation of the lands as open space in the TTC LAP and the zoning in the Draft Plan correlate and there is no planning reason to exclude this area from the LAP lands. It serves as an excellent connection between the LAP lands and the adjoining communities providing pedestrian and cycling access between Belgard Heights and public transport and services located with the LAP lands on the Belgard Road which serving as an excellent amenity for the local community at the Dale and Belgard Heights.</p> <p>The new points system to which a submission refers, is the Infrastructure and Planning Assessment. To deliver an evidenced based Core Strategy in line with the requirements prescribed in the</p>

SD-C195-185 Theresa O'Neill	there are alternative waste/unused lands that could be built on which would not affect local residents unduly.	<p>National Planning Framework (NPF), namely the Tiered Approach to Land Zoning (NPO 72a, 72b, 72c &amp; Appendix 3 of NPF), the Infrastructure and Planning Assessment was developed to build upon the initial Land Capacity Analysis. The Land Capacity analysis was carried out by the Planning Department to calculate the potential yield of undeveloped land (RES, RES-N, TC, REGEN, VC, DC, LC and SDZ) zoned in the 2016 - 2022 County Development Plan. Land zoned Objective OS are excluded. The Infrastructure Assessment involved gathering data in relation to identified lands infrastructural constraints and requirements while the Planning Assessment built upon those findings considering overall planned levels of growth, location, suitability for the type of development envisaged and the availability of and proximity to existing services and amenities thus ensuring compliance with overarching national and regional Strategic Outcomes. An application of a scoring system to aid in the analysis process was developed and provided for a robust and strong evidence base for the Core Strategy which will facilitate growth over the plan period in line with the housing supply targets set out by the Dept. of Housing, Local Government and Heritage. It should be noted that the NPF requires that an evidence base be provided at settlement scale for the Tier 1 and Tier 2 designation of lands and therefore Tallaght Town Centre Area has been scored in its entirety.</p> <p><b>CE Recommendation:</b> No change to Draft Plan.</p>
SD-C195-239 Ciaran Costelloe	A submission has welcomed that the Draft Plan has retained the green area with an Open Space zoning adjacent to The Dale leading up to the Belgard Community centre. It notes that this area should not have been included within the Cookstown boundary of the Tallaght LAP as Bóthar Katherine Tynan is the boundary. It also urges the Council to always retain this valuable green area in the future and strongly object to any rezoning from a green area for residential or economic purposes.	
SD-C195-107 Ewelina Pawlik	Further submissions wish to strongly object to the proposed residential build on the green area facing the View/Dale Belgard heights and also Belgard community centre green area. One such is aghast that the Council has even considered building on public amenity space and appeal to the Planning Committee to ensure that the green space is preserved for future generations. It has been highlighted that there is a problem in this area with the foul drainage system and it cannot handle extra pressure from new development.	
SD-C195-261 Jeannette & Brian Beehan	An additional submission would like to appeal the planning permission to the rezoning of the land adjacent to The Dale in Belgard Heights which must not be considered due to a loss of another recreational area for local children to use, the overdevelopment of Cookstown as it's been rezoned as residential and the residential development on Belgard Road bounded by Luas and Naas Road.	
SD-C195-274 Neal Costelloe	A submission indicates that a new points system for selecting suitable sites for residential development with 100 points for prime sites and a sliding scale for lesser sites has been introduced as part of this Draft Pan. In that regard, the submission notes that Tallaght Town Centre has been	
SD-C195-287 Matt MacCullagh		
SD-C195-288 Seamus Brady		
SD-C195-291 Eamonn Heffernan		

<p>SD-C195-293 Jacinta Doyle</p> <p>SD-C195-286 Belgard Area Residents Association</p> <p>SD-C195-154 Tallaght Community Council</p>	<p>conferred with a 100 point rating including a parcel of land to front of The Dale, Belgard Heights.</p> <p>A submission requests a new SLO : There will be no development on the areas identified in the above map ( The Dale, Belgard Height ) and Landale Park near the general Springfield area. It also requests that mention of The Dale, Belgard Height and Landale Park near the general Springfield are removed from the Tallaght Town Centre LAP</p>	
<p>SD-C195-281 Dublin Friends of the Earth</p>	<p>This submission states that public parks need to be made more suitable for increased outdoor living due to the Covid-19 pandemic, asking for more features in our park for the public to use. They go on to state that facilitating activity in open space areas should be considered, with an example of patches being given to community groups to trial community vegetable gardens.</p>	<p><b>CE Response:</b></p> <p>The Public Realm Department of the Council continuously reviews its approach to managing open spaces and parks in the County and the use of these spaces. In this regard a Parks and Open Space Strategy is under preparation and has included a user survey with which a large number of the public engaged.</p> <p>The Draft Plan supports multi-functional use of open space through its objectives. Policy COS5:</p> <p>Provide a well-connected, inclusive and integrated public open space network through a multi-functional high-quality open space hierarchy that is accessible to all who live, work and visit the County.</p> <p>The Draft Plan also contains policy on allotments in <b>GI6 Objective 10:</b></p> <p>‘To continue to protect and promote existing allotments and provide for new allotments where feasible in accordance with a review of the provision and management of allotments across the County.’</p> <p>The provision of uses within the Parks is an operational matter but multi-functional uses are supported in the Draft Plan.</p>

		<p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<p>SD-C195-283 Finnstown Abbey Residents Association</p> <p>SD-C195-254 Deputy Emer Higgins</p>	<p>A submission expresses the need for more parks and recreational facilities due to the planned development at Clonburris and the completion of Adamstown.</p> <p>A submission welcomes the vision of the Draft Plan and asks that housing be provided where transport provision and social infrastructure can be delivered. As such, the submission requests that the following parks be provided: Public parks in Newcastle, Adamstown and Clonburris.</p>	<p><b>CE Response:</b></p> <p>The issues relating to housing and transport development are addressed in Chapter 2 of the Draft Plan. The compact growth approach ensures the location of development in sustainable locations proximate to public transport.</p> <p>The SDZ Schemes at Adamstown and Clonburris have been both been adopted through the SDZ process which involved extensive public consultation, in both cases oral hearings were held which examined in detail a whole range of issues including parks and recreational facilities. Both schemes provide for extensive parks and open space. Tandy's Lane Park has been delivered in Adamstown with Airlie Park currently under construction and further park beside Tubber Lane – Tobermaclugg – with planning permission and to be delivered. Delivery of parks in Clonburris will occur in tandem with development.</p> <p>The Newcastle LAP provides for a larger park to the south of the lands. This park has received planning permission and has commenced construction as part of the SHD development on the lands. Furthermore, phasing is being recommended for the LAP lands in CE Response: to the OPR submission which will ensure further delivery of open space in tandem with development.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
<p>SD-C195-90 Temple Manor Wilkins Residents Association</p>	<p>Temple Manor Wilkins Residents Association who represent approx. 350 households have made a submission requesting that a specific SLO be included for Greenhills Park, Dublin 12 to read as follows: "That SDCC engage with stakeholders and Residents groups in formulating a biodiversity plan for</p>	<p><b>CE Response:</b></p> <p>This issue is a matter for the South Dublin Biodiversity Action Plan. The County Development Plan has no remit in this regard.</p>

<p>SD-C195-228 Pamela Kearns</p>	<p>Greenhills Park as part of its commitment to the All-Ireland Pollinator Plan in line with COS5 Objective 8, Objective 10 and in particular Objective 11."</p> <p>A further submission has expressed support for this proposed SLO.</p>	<p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
<p>SD-C195-269 John O'Leary</p>	<p>Submission notes that Rathcoole Park continues to need a 25/30 car carpark and more so now following the upgrade of some pitches to coincide with recent Irish Water works. BCM has proposed a location to SDCC in the recent past for this car park and await a feasibility study</p>	<p><b>CE Response:</b></p> <p>The provision of additional car parking spaces within Rathcoole Park is being proposed as part of a wider delivery of pitches associated with the Council's proposed amendments to zoning in the area arising from CS10 SLO1 in the Draft Plan.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
<p>SD-C195-229 Glenveagh Properties</p>	<p>The submission notes that the minimum open space requirements are consistent with national guidelines but that the overall standard of 2.4 ha per 1,000 population is not a standard which is supported by National Guidelines, past or present. The submission requests that the 'Overall Standard' of 2.4 Ha per 1,000 population be removed from Table 13.22 of the Draft CDP. In this regard, the submission recognises that there is a requirement to ensure that public open space is provided for but takes the view that quality public open space for new residential developments opposed to quantitative amounts of public open space would have a much more positive contribution to areas other than the policy provision which currently exists. In addition, it is considered that the potential requirement to apply a special contribution to an individual development where this unsupported overall standard cannot be met is inappropriate.</p>	<p><b>CE Response:</b></p> <p>The open space standards set out in the Draft Plan have been determined following significant research on approaches to open space provision nationally and internationally. This research was conducted by consultants on behalf of the Council as part of the preparation of the draft Plan and to inform the Parks and Open Space Strategy being developed by the Public Realm section of the Council. They align with planning guidelines and are considered appropriate and reasonable.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>

<p>SD-C195-135 Armstrong Fenton Associates</p>	<p>Submission requests that <b>COS5 SLO2</b> be omitted from the draft CDP and not attached to the land upon adoption of the new CDP.</p> <p>COS5 SLO2 states <i>'To require the provision of public open space and to ensure that the location, layout and design of the public open space facilitates the delivery of a sports pitch to facilitate multiuse within the Boherboy lands in the south part of the Fortunestown LAP lands, alongside the residential development that is permitted on these lands'</i>.</p> <p>The submission states further that the designated lands are zoned RES-N and are to be developed for residential land uses, with a school site to be reserved on the western portion of the lands. They also raise the point that the the LAP requires public open space be provided in the centre of the lands as well as a biodiversity strip along the eastern boundary with the Corbally stream, to provide pedestrian/cycle access to the District Park (Carrigmore Park)</p> <p>Given that a SHD application is to be submitted on the entire Boherboy site (2 developers), it is considered that the proposed SLO is not warranted in this instance.</p>	<p><b>CE Response:</b></p> <p>The Boherboy lands, as with any other lands on which development is proposed, will be required to provide open space in line with the standards set out in the Development Plan. There is opportunity for the Boherboy lands to augment the existing park to the north of the district centre by ensuring that open space lands are located in this area. This will facilitate the delivery of pitches for the new community in Fortunestown. This is considered a reasonable approach to the development of the lands which will ensure the best outcome in the delivery of open space. The zoning of the land RES-N does not in any way indicate that open space is not a use, in fact Open Space is permitted in principle in RES-N and is required under the LAP and the Development Plan.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<p>SD-C195-249 Bairbre Brennan</p>	<p>A submission requests that consideration is given to developing landscaping plans for all green spaces especially small residential open spaces to protect and enhance the levels of biodiversity and enhancing their social amenity.</p>	<p><b>CE Response:</b></p> <p>The Public Realm Department of the Council continuously reviews its approach to managing open spaces and parks in the County and the use of these spaces. In this regard a Parks and Open Space Strategy is under preparation and has included a user survey with which a large number of the public engaged.</p> <p>The treatment of public open spaces in the County are an operational matter for the Public Realm Department of the Council. Different areas will be treated differently depending on a range of issues such as size, location, biodiversity features and public access.</p>

		<p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<p>SD-C195-222 Tallaght Community Council</p>	<p>This submission highlights the following SLOs for inclusion in the Draft CDP:</p> <ul style="list-style-type: none"> <li>- New SLO to be included which looks for an audit of natural play areas installed since 2010. Assess &amp; learn - How many have been developed? How many have been significantly damaged maliciously? What elements proved more durable than others? What furniture should be phased out? What is the average life cycle of the play areas? Which and when will the play areas fall due for maintenance or full replacement?</li> <li>- New SLO for the Dodder Valley Park (Avonmore Road), Killinarden Park, Jobstown Park and McGee Park, SDCC will scope and design the boundaries of these public parks to ensure they have high quality, formal entrances and boundaries to complete any stretches which do not have this in place. The boundaries should harmonise from a design perspective and set a quality tone, e.g Ballycragh Park, Corkagh Park, Rathcoole Park.</li> <li>- New SLO to deliver better for accessibility for wheelchair users in our parks, across all features (pathways, furniture, sensory and recreational amenities etc), an inclusion checkpoint should be included as part of the design process.</li> </ul>	<p><b>CE Response:</b></p> <p>The detailed requests set out in this submission are not matters for the County Development Plan which is a strategic landuse document. These are matters which should be addressed through the Public Realm Department of the Council.</p> <p>The Draft Plan emphasizes the quality of open spaces, including access as set out in section 8.7.5:</p> <p><b>Accessibility</b></p> <p><i>Age friendly and disability friendly measures should be incorporated into the overall design and layout of public open spaces, such as the provision of appropriate information, suitable path surfaces and seating at appropriate intervals or other types of rest stops. Facilities, equipment and information materials should be accessible for all regardless of age or ability.</i></p> <p>This is supported by a number of objectives on universal design in Chapter 5 and by <b>COS5 Objective 8:</b>  <i>To ensure the design of parks and public open space areas is of high quality; to provide a pleasant setting, accommodate use by people of all ages and abilities, to support life-long activity and good health and well-being by the provision of a balanced mix of active and passive recreation and access to, or view of, nature, ensuring that the design considers:</i></p> <ul style="list-style-type: none"> <li><i>àà provision of an appropriate mix of hard and soft surfaced areas;</i></li> <li><i>àà enhancement of biodiversity and existing trees and hedgerows;</i></li> <li><i>àà incorporation of water courses, other natural features and existing built heritage into the design of parks and open spaces as appropriate;</i></li> <li><i>àà provision of new planting, landscape features and appropriate site furniture including a variety of accessible, well located and designed seating.</i></li> </ul>



		<p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<p>SD-C195-216 O'Flynn Group</p>	<p>This submission relates to land located at St. Edmondsbury and Woodville, Lucan, Co. Dublin, where this land is subject to a Special Amenity Area Order (SAAO), for the delivery of the 'Liffey Valley Park', with access to and footpaths along the river, pedestrian bridges to provide river crossings, securing the conservation of Shackelton Mill and developing facilities for anglers and canoeists.</p> <p>30 years after the order has been put in place, some objectives remain undelivered, due to the nature of the land ownership (private). With active land management, the submission highlights the opportunity for the creation of a signature park with benefits for the local and regional area, turning this area into a focal pint of civic pride, by opening up lands along the river.</p> <p>The lands in question (St. Edmondsbury and Woodville), are approx 274 acres and link directly with Lucan village. The lands are also in private ownership and could deliver on the objective for the Liffey Valley Park, providing green space, building biodiversity supports while protecting what is environmentally significant.</p> <p>Submission highlights the collaborative benefits between both SDCC and Fingal County Council, north and south of the river, together with the landowners and other stakeholders involved in a project of this size. The development of the Liffey Valley Park would also deliver the objective for the revival of Shackelton Mill (which suffers from access north of the river). An interpretation centre could be provided south of the Liffey providing access across the river to the mill.</p> <p>The submission also highlights that the land benefits from excellant access to public transport, with connections to the</p>	<p><b>CE Response:</b></p> <p>The submission has been noted.</p> <p>The lands are located at St. Edmondsbury and Woodville in Lucan and comprise significant areas within the SAAO for Liffey Valley in addition to lands along the river with a pNHA.</p> <p>The submission outlines various benefits which the lands could provide in delivering the objective for the Liffey Valley Park.</p> <p>The objective to provide a Liffey Valley Park is long acknowledged and has been achieved in part with the delivery of Waterstown Park. As lands are largely in private ownership the delivery of further areas of park has not been possible to date.</p> <p>NCBH7 Objective 4 is included in the Plan on foot of further amendments and refinements made by the Members before the Draft Plan was approved to go out on display. It states:</p> <p>To facilitate and support the development of the Liffey Valley (Zoning Objective 'HA – LV') as an interconnected green space and park in collaboration with Dublin City Council, Fingal County Council, Kildare County Council, the OPW and other State agencies, existing landowners, community groups and sectoral and commercial interests in accordance with the Ministerial Order for the Liffey Valley SAAO by:</p> <ul style="list-style-type: none"> <li>àà Carrying out a study of the lands that comprise Liffey Valley inclusive of the Special Amenity Area Order (SAAO) and adjacent lands;</li> <li>àà Investigating and determining, as part of the study, viable and appropriate uses to support and facilitate the development of a Regional Park (Liffey Valley Park), with particular emphasis on enhancing the recreation, amenity value and accessibility of the</li> </ul>



	<p>city which will be further enhanced by Bus Connects and the LUAS expansion (National Development Plan).</p> <p>The submission proposes a SLO that provides for the consolidation and implementation of the SAAO objectives, in the following form:</p> <p><i>“To carry out a Feasibility Study for the lands that comprise Liffey Valley inclusive of the Special Area Amenity Order (SAAO) and adjacent lands to investigate and determine viable and appropriate uses to support and facilitate the development of a Regional Park (Liffey Valley Park), with particular emphasis on enhancing the recreation, amenity value and accessibility of the area, in accordance with the Council’s published document Towards a Liffey Valley Park (2007). This new Regional Park will serve the needs of existing communities of Lucan as well as the wider Greater Dublin area. The study will be carried out in consultation with the surrounding Local Authorities, State Agencies, private landowners, sectoral, community and commercial interests.”</i></p>	<p>area while protecting the valley’s biodiversity and enhancing the green infrastructure network;</p> <p>àà Identifying and designating, as part of the study, possible future new pedestrian routes and footbridge locations in accordance with ‘Towards a Liffey Valley Park’ (2007) or any superseding plan, including potential permissive access routes.</p> <p>Universal accessibility for all should be balanced with ensuring that environmental and built heritage sensitivities are not negatively impacted upon.</p> <p>NCBH7 Objective 4 goes into greater detail than the SLO offered by the O’Flynn Group, emphasising the enhancement of the area while protecting the valley’s biodiversity and enhancing the green infrastructure network.</p> <p>NCBH7 SLO 1 within the Draft Plan looks to investigate the potential of collaborating with Fingal County Council for the re-use of Shackleton’s Mill as a tourism destination given its location in proximity to Lucan Village, which forms part of the masterplan submitted with this submission.</p> <p>In addition <b>NCBH7 Objective 6</b> states: To actively pursue the extension of publicly owned lands, either by direct purchase or land swap within and adjacent to the Liffey Valley Special Amenity Area to create a linked series of park land and open spaces.</p> <p>And <b>NCBH7 Objective 7</b> states: To work in collaboration with the owners of lands along the length of the river to seek to provide appropriate public access.</p> <p>It is considered that NCBH7 Objective 4 and associated objectives appropriately deal with the development of the Liffey Valley Park.</p> <p><b>CE Recommendation:</b></p>
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		No change to the Draft Plan.
SD-C195-154 Tallaght Community Council	<p>The submission provides a breakdown of open space available within the TTCLAP and submits that the density proposed exceeds public open space requirement in TTCLAP area and estimates that public open space in the Tallaght Town centre is 64.7 hectares and that the LAP has an ambition to house up to 34,000 people which contradicts the minimum requirement for public open space of 2.4 Ha (hectares) per 1,000 population.</p> <p>The submission states that a population of 27,000 for Tallaght Town Centre is still excessive but note that 27,000 is less than 34,000 by a factor of 7000. The submission asks the council to reduce their population estimate by at least twice this, a reduction of 14,000 so that the new long term target population is 20,000 not 34,000.</p>	<p><b>CE Response:</b></p> <p>The Tallaght Town Centre Local Area Plan is a 6 year Local Area Plan as stipulated by legislation. The approach taken in the preparation of the Plan was to look at the area as a whole in order to ensure the long term viability of the approach taken. Therefore, while the plan has a 6 year timeframe the overall long term capacity of the LAP lands have been considered as part of the plan making process. The plan has also been written with detailed phasing requirements which set out clearly what is to be provided within each neighbourhood area in tandem with development. Should there be any conflict between the LAP and the Development Plan, the Development Plan takes precedence. Planning applications will have to demonstrate how they are according with the open space standards in the Development Plan.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
SD-C195-154 Tallaght Community Council	<p>The submission requests the following SLO to be included:</p> <p>SLO : Pending the refurbishment of the Cookstown according to LAP SLO OS7 “To incorporate existing features such as Cookstown Reservoir into the Green Infrastructure elements of the Plan (Objective OS7).”</p>	<p><b>CE Response:</b></p> <p>As outlined in the submission, the development principle ‘To incorporate existing features such as Cookstown Reservoir into the Green Infrastructure elements of the Plan (Objective OS7) is included in the Tallaght Local Area Plan.</p> <p>This Objective refers to Cookstown Reservoir and similar elements of the Cookstown area which may have potential for incorporation into the GI network for the area. The Cookstown Reservoir is in the ownership of Irish Water, there are significant safety, security and public health issues around any proposal to use the roof of the reservoir for any purposes. However, the GI Strategy supports the</p>

		<p>integration of the reservoir into the wider GI network, for instance GI1 Objective 1 states:</p> <p>To establish a coherent, integrated and evolving GI Network across South Dublin County with parks, open spaces, hedgerows, trees including public street trees and native mini woodlands (Miyawaki-Style), grasslands, protected areas and rivers and streams and other green and blue assets forming strategic links and to integrate and incorporate the objectives of the GI Strategy throughout all relevant land use plans and development in the County.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<p>SD-C195-154 Tallaght Community Council</p>	<p>The submission raises its concern at the inclusion of the following in the Council Development Contribution Schem: “The council may.... At its sole discretion...determine a financial contribution in lieu of .. public space” and requests clarity on this and its process to determine alternatives accepted in “vicinity of the site”.</p>	<p><b>CE Response:</b></p> <p>The submission appears to be relating to COS5 Objective 7 which states:</p> <p>To require at the sole discretion of the Planning Authority a pro rata contribution in lieu of provision of public open space where, due to the small size, configuration or location of a particular development or on sites with less than three units it is not possible to provide functional public open space on site.</p> <p>There will be times where a site size is too small to be able to provide the open space required by the standards set out in the Draft Plan. This objective ensures that a developer makes a financial contribution to the Council which would be used to enhance open space in the area. Should this objective not be in the Draft Plan, situations would arise where the site is too small to provide meaningful open space and no financial contribution could be sought from the developer.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>

<p>SD-C195-154 Tallaght Community Council</p>	<p>The submission requests that the following from page 306 be amended to include “ Continuous walls and other barriers between public open spaces should be avoided, if possible taking local conditions and safety into account.”</p> <p>The submission also requests that COS5 Objective 21– Play policy- be amended to add “ seek and consider feedback from the community as part of the review”.</p> <p>As well, it requests that COS5 SLO 3 be amended to add: "To include the Jobstown / Whitestown stream from Bawnlea to Killinarden Park ( both sides of the N81)."</p> <p>Insert SLO</p> <p>To deliver quality planting of trees and wild flower meadows in Sean Walsh Park Phase 2 along Kiltipper way.</p>	<p><b>CE Response:</b></p> <p>The detail of determination of boundaries of Parks and Open Space is not a matter for the County Development Plan which is a strategic landuse policy document. These are matters for the Public Realm Department of the Council and should be raised directly with that department.</p> <p>The Public Realm Department of the Council and its staff liaise and work with local communities in the delivery of services. Feedback from the public is considered on an ongoing basis.</p> <p><b>COS5 SLO 3</b> states as follows; ‘That the area on both sides of Whitestown Stream/Jobstown Stream inclusive of the Stream itself between Cloonmore Estate on one side and Bawnlea and Dromcarra Estates on the other and from the Jobstown Rd to the N81 be designated a Local Park/Open Space and prioritising over the life-time of the plan upgrading the regreening of the area and the protection of the watercourse running through it, including the inclusion of intergenerational uses of the space such as outdoor exercise equipment. The re-greening of the area to be in accordance with the implementation of South Dublin County Parks and Open Space Strategy.’</p> <p>It is considered that the objective is clear as to the area it refers to. It not recommended to make any further change.</p> <p>The Draft Plan includes a number of objectives including the support of the Pollinator Plan. Details of planting within the Parks are an operational matter.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
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SD-C195-298 Councillor Lynn McCrave	A submission calls for the development plan to support the objectives of the Green Flag Award in Rathfarnham Castle Park by providing timed lighting for the Athletics Club in support of sections 6, and also support sections 4 and 2 of the 'Green Flag Award'.	<p><b>CE Response:</b></p> <p>The specific detail requested is outside of the remit of the County Development Plan which is a strategic landuse policy document. It is a matter for the Public Realm Department of the Council.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
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Healthcare Facilities		
Submission No.	Submission Summary	CE response and recommendation
SD-C195-55 St. Patrick's Mental Health Services	<p>St Patrick's Mental Health Services located at St Edmundsbury Hospital Lands in Lucan offer significant range of mental health services, including in-patient care with accommodation for 52 people, with a multidisciplinary team that provides care and treatment. St Edmundsbury house has a long-established use for mental health purposes since 1899. The last significant extension to the building complex of a ward facility was in 1985.</p> <p>The submission highlights the increasing future demand for mental health services and also appreciates the highly sensitive planning and environmental context of the site with a zoning objective HA-LV. Open Space is the sole 'permitted in principle' use under this zoning objective and those 'not permitted' include health centre, hospital, primary health care centre and retirement homes.</p> <p>The submission expresses that St Patrick's are keen to ensure that any future expansion of mental health services can be proposed on the site and would like to strengthen the</p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted.</p> <p>The Council understands the importance of the mental health services provided on St. Edmundsbury Hospital Lands in Lucan.</p> <p>As set out in the submission, the hospital lands are set historically in a sensitive landscape within the Liffey Valley at Lucan. These lands have become all the more important as urban development in the area has progressed. This is recognised through a number of policies in the Draft Plan relating to Liffey Valley, in particular the delivery of a Regional Park. The Green Infrastructure strategy includes Strategic Corridor 4: Liffey Valley which has a number of objectives associated with the core area/stepping stones which relate to the lands at St. Edmundsbury, which include the preservation and enhancement of the woodlands and improving access to the St. Edmondsbury lands.</p> <p>Given the long term use of the lands in question and the need the hospital serves, it is considered appropriate to include an SLO within the Draft Plan to examine the potential for the future</p>

	<p>planning policy basis around the existing St. Patrick's Hospital Lands.</p> <p>A submission highlights EDE20 SLO 1 which seeks the provision of appropriate public access to lands in Liffey Valley, however the submission requests that a new SLO be included in the Plan as follows: 'To work in collaboration with the owners of St Patricks Hospital lands at St Edmundsbury, Lucan in the preparation of a Masterplan to guide the future provision of expanded mental health services and accommodation on the existing hospital campus lands and including the provision of appropriate public access to these lands in the Liffey Valley. The Masterplan will have full regard to the setting and integrity of the Protected Structures on the lands, the highly sensitive environmental characteristics of the site in relation to the Liffey Valley and Green Infrastructure principles'.</p>	<p>provision of mental health services and accommodation on the existing hospital campus lands and including the provision of appropriate public access.</p> <p><b>CE Recommendation:</b></p> <p>Insert a new SLO into the Draft Plan as follows:</p> <p>NCBH7 SLO2: To work in collaboration with the owners of St Patricks Hospital lands at St Edmundsbury, Lucan in the preparation of a Masterplan to examine the potential for the future provision of mental health services and accommodation on the existing hospital campus lands. The Masterplan will have full regard to the setting and integrity of the Protected Structures on the lands, the highly sensitive environmental characteristics of the site in relation to the Liffey Valley and Green Infrastructure principles and the need to provide appropriate public access to the lands'</p>
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Early Childhood Care and Education Facilities		
Submission No.	Submission Summary	CE response and recommendation
<a href="#">SD-C195-254 Deputy Emer Higgins</a>	<p>The submission welcomes the vision of the Draft Plan and asks that housing be provided where transport provision and social infrastructure can be delivered. As such, the submission requests that the following schools be provided:</p> <p>New primary school buildings for:</p> <p>Scoil Chronáin in Rathcoole, St Thomas JNS &amp; Scoil Aine SNS, Devine Mercy and Gaelscoil Chluain Dolcain in Clondalkin and St. Mary's NS in Lucan</p> <p>New post-primary school buildings for:</p>	<p><b>CE Response:</b></p> <p>In relation to school provision, South Dublin County Council has engaged with the Department of Education on school provision in the County for a number of years through a Memorandum of Understanding which enables the delivery of much needed schools in the County. This MOU has been extremely successful in the delivery of schools across the County in recent years. As part of the preparation of the Draft Plan there was extensive engagement with the Department and examination of future needs based on the projected population growth over the period of the Plan and beyond. The indication of school sites on the Draft Plan maps is the outcome</p>

	<p>Holy Family Community School in Rathcoole and Lucan Community College, St. Joseph's Community College and Griffeen Community College all in Lucan.</p>	<p>of that engagement. The Department has made a submission to the Draft Plan.</p> <p>It is noted that a new school site is to be provided in Rathcoole, which, in consultation with the Department is being proposed as an amendment to the Plan – see CE Response: to the OPR submission set out separately above. Planning permission has also been granted for further school provision in Rathcoole.</p> <p>The Department has not indicated the need for any further school sites in Lucan other than those already outlined on the Development Plan maps. The matter of upgrading existing schools is one for the Department.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan</p>
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Primary and Post-Primary Schools		
Submission No.	Submission Summary	CE response and recommendation
<p><a href="#">SD-C195-50 Kieran Mahon</a></p> <p><a href="#">SD-C195-49 Kieran Mahon</a></p>	<p>The submission notes that educational demands are shifting away from the traditional patronage of the Catholic Church and ethos dominated curriculum and towards an alternative patronage and ethos. It is also noted that there has been significant demand for Gael Scoilleanna.</p> <p>The submission emphasises that there is a responsibility to meet the demands for educational facilities of competing patronage due to the increasing diversity of culture and ethnicity within the County.</p> <p>The submission highlights that a recent negative illustration of current policy saw the community in City West essentially pitted against each other over the patronage of a second level school.</p>	<p><b>CE Response:</b></p> <p>The contents of this submission are noted and acknowledged.</p> <p>As highlighted within the Draft Plan, education facilities have a central role to play in developing sustainable and balanced communities with the responsibility for delivery of education facilities and services lying with the Department of Education and Skills (DES).</p> <p>The Council has worked closely with the DES since 2012 under a nationally agreed Memorandum of Understanding (MoU), to proactively identify and acquire sites for new primary and post-primary schools and to support the Department's Schools Building Programme. The current Schools Building Programme</p>



	<p>It is contended that the County Development Plan should aim to resolve these types of issues.</p> <p>The submission requests to add an additional policy within Chapter 8: Community Infrastructure and Open Space under COS8 to read “To engage with the Department of Education and Skills to encourage, where necessary, co- location of schools in areas where there is established demand for competing patronages or school ethos at Primary or Secondary Level.”</p>	<p>provides for significant investment in school buildings under Project Ireland 2040 and will continue to deliver schools in the County.</p> <p>The patronage of schools is not a matter for the County Development Plan, it is an issue for the Department of Education. South Dublin County Council will continue to work in conjunction with the Department of Education and Skills (DES) to support the provision of new schools in specific areas identified by the DES Schools Building Programme.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p>SD-C195-256 Department of Education &amp; Skills</p>	<p>The Department of Education (DES) in their submission note that the draft plan has to sit within the framework of the ESRI’s 50:50 scenario which aligns with the NPF’s 2040 population targets and settlement pattern. The NPF Implementation Roadmap projects a population for South County Dublin of 320,500 – 329,000 people by 2031. This represents a minimum increase of 41,733 people (and up to 50,233 people under the high growth scenario) over the 2016 population of 278,767 people. The DES also note that there is potential for further compact growth up to 2040 and beyond. The DES in their submission emphasise that they have regard to the longer-term framework because population and housing targets are the key driver in considering likely school requirements.</p> <p>The DES note that the Draft Plan projects a population for South County Dublin of 325,285 people by 2028. This equates to an increase of 46,518 people over the 2016 population of 278,767. It is further noted that the Draft Plan incorporates the high growth scenario of the NPF and it also front-loads the</p>	<p><b>CE Response:</b></p> <p>The contents of this submission are noted and acknowledged. As per Section 8.10 Primary and Post-Primary Schools, demographic changes in South Dublin County will continue to be monitored by the Department of Education and Skills on an ongoing basis. In addition, the Council has engaged extensively with the Department, as part of the preparation of this Plan, to identify school need in each neighbourhood area based on the population growth identified in the core strategy. This engagement involved the review of school reservations on the 2016 Development Plan maps and within LAPs to ascertain whether they should be retained as part of this Plan and assessment, based on the core strategy, of whether new schools would be required.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>



	<p>growth up to 2026 so that 95% of the growth for the plan period (44,041 people) will have taken place by 2026.</p> <p>The Department of Education (DES) acknowledges the crucial importance of the ongoing work of the Council in ensuring sufficient and appropriate land is zoned for educational needs.</p>	
<p><a href="#">SD-C195-256 Department of Education &amp; Skills</a></p>	<p>The Department of Education (DES) generally welcomes the objectives contained in Chapter 8: Community Infrastructure and Open Space. In regard to the provision of schools, the DES welcomes COS8 Objective 1 (concerning the reservation of suitable school sites) and suggests that it be bolstered by a specific reference to a commitment to follow the 2008 Code of Practice on the Provision of Schools and the Planning System.</p>	<p><b>CE Response:</b></p> <p>It is noted that the DES generally welcomes the objectives contained in Chapter 8: Community Infrastructure and Open Space.</p> <p>The DES refer to COS8 Objective 1 which states:</p> <p><i>COS8 Objective 1:</i></p> <p><i>To reserve and identify early on sites for primary and post-primary provision in developing areas through the Development Plan, Local Area Plans, Planning Schemes and masterplans, in consultation with the Department of Education and Skills and to ensure that designated sites are of sufficient size and are accessible cycle and pedestrian friendly locations, consistent with, consistent with NPO 31 of the NPF and RPO 9.21 of the RSES.</i></p> <p>The DES suggest that COS8 Objective 1 be bolstered by a specific reference to a commitment to follow the 2008 Code of Practice on the Provision of Schools and the Planning System. This is considered appropriate that COS8 Objective 1 be amended to have regard to the 2008 Code of Practice on the Provision of Schools and the Planning System (or any superseding Code of Practice).</p> <p><b>CE Recommendation:</b></p> <p>Amend CO8 Objective 1 from:</p> <p><i>COS8 Objective 1:</i></p>

		<p><i>To reserve and identify early on sites for primary and post-primary provision in developing areas through the Development Plan, Local Area Plans, Planning Schemes and masterplans, in consultation with the Department of Education and Skills and to ensure that designated sites are of sufficient size and are accessible cycle and pedestrian friendly locations, consistent with, consistent with NPO 31 of the NPF and RPO 9.21 of the RSES.</i></p> <p>To:</p> <p><i>COS8 Objective 1:</i></p> <p><i>To reserve and identify early on sites for primary and post-primary provision in developing areas through the Development Plan, Local Area Plans, Planning Schemes and masterplans, in consultation with the Department of Education and Skills, <b>to have regard to the 2008 Code of Practice on the Provision of Schools and the Planning System (or any superseding Code of Practice)</b> and to ensure that designated sites are of sufficient size and are accessible cycle and pedestrian friendly locations, consistent with, consistent with NPO 31 of the NPF and RPO 9.21 of the RSES.</i></p>
<p><a href="#">SD-C195-256 Department of Education &amp; Skills</a></p>	<p>The Department of Education (DES) in their submission refer to COS8 Objective 2 and Objective 4 relating to the redevelopment and extension of existing schools respectively. The DES request that, given the critical importance of the existing school network to meeting future requirements in South Dublin County in the context of compact development under the NPF, a separate objective on redevelopment and extension of existing schools be included as follows:</p> <p>To ensure that existing and new school sites are protected for educational use and that lands adjacent to existing schools are protected for future educational use in order to allow for expansion of these schools, if required, subject to site suitability.</p>	<p><b>CE Response:</b></p> <p>The contents of this submission are noted and acknowledged. The submission refers to COS8 Objective 2 and Objective 4 which state:</p> <p><i>COS8 Objective 2:</i></p> <p><i>To facilitate the development of new schools, the re-development of existing schools and extensions planned as part of the Government's School Building Programme.</i></p> <p><i>COS8 Objective 4:</i></p>

		<p><i>To support and facilitate the extension of existing school facilities, based on identified needs, subject to appropriate safeguards in relation to safe travel to school, traffic management and the amenities of the area.</i></p> <p>The submission requests that, given the critical importance of the existing school network to meeting future requirements in South Dublin County in the context of compact development under the NPF, a separate objective on redevelopment and extension of existing schools be included as follows:</p> <p><i>To ensure that existing and new school sites are protected for educational use and that lands adjacent to existing schools are protected for future educational use in order to allow for expansion of these schools, if required, subject to site suitability.</i></p> <p>It is considered that COS8 Objective 2 should be amended to read as follows:</p> <p><i>To facilitate the development of new schools ensuring that new school sites are retained for educational use and the re-development of existing schools and extensions planned as part of the Government's School Building Programme.</i></p> <p><b>CE Recommendation:</b></p> <p>Amend COS8 Objective 2 as follows:</p> <p><i>COS8 Objective 10:</i></p> <p><i>To facilitate the development of new schools <b>ensuring that new school sites are retained for educational use and the re-development of existing schools and extensions planned as part of the Government's School Building Programme.</b></i></p>
<p>SD-C195-256 Department of Education &amp; Skills</p>	<p>The Department of Education (DES) welcome the support for the urban school model contained in COS8 Objective 5.</p>	<p><b>CE Response:</b></p> <p>It is noted that the DES welcome the support for the urban school model contained in COS8 Objective 5 which states:</p>

		<p><i>COS8 Objective 5:</i></p> <p><i>To promote an urban school model within built-up areas of the County, where access to off-site facilities including for sport, recreation and amenity space can be clearly demonstrated.</i></p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p>SD-C195-256 Department of Education &amp; Skills</p>	<p>The Department of Education (DES) suggest that COS 8 Objective 3 be re-worded to read:</p> <p>To require that suitable school places are available to new communities, whether at an existing school or a new school. If a new school is required, to ensure that its delivery is planned in tandem with the delivery of the residential development, in accordance with the phasing requirements of Local Area Plans and Planning Schemes or as may be otherwise required.</p> <p>In this regard, it is submitted that the current wording could be interpreted as a requirement for a new school for every new community. While the DES acknowledge that this is often the situation, it is considered that it can also arise that the needs of a new community can be met at an existing school (by redevelopment or extension).</p>	<p><b>CE Response:</b></p> <p>The contents of this submission are noted and acknowledged. The submission refers to COS 8 Objective 3 and requests that it be amended to read as follows:</p> <p><i>COS8 Objective 3:</i></p> <p><i>To require <del>schools to be provided in new communities on a phased basis in tandem with the delivery of residential development,</del> <b>that suitable school places are available to new communities, whether at an existing school or a new school. If a new school is required, to ensure that its delivery is planned in tandem with the delivery of the residential development,</b> in accordance with the phasing requirements of Local Area Plans and Planning Schemes or as may be otherwise required.</i></p> <p>This is considered appropriate.</p> <p><b>CE Recommendation:</b></p> <p>Amend COS8 Objective 3 from:</p> <p><i>COS8 Objective 3:</i></p> <p><i>To require schools to be provided in new communities on a phased basis in tandem with the delivery of residential development, in accordance with the phasing requirements of</i></p>

		<p><i>Local Area Plans and Planning Schemes or as may be otherwise required.</i></p> <p>To:</p> <p><i>COS8 Objective 3:</i></p> <p><i>To require schools to be provided in new communities on a phased basis in tandem with the delivery of residential development, <b>that suitable school places are available to new communities, whether at an existing school or a new school. If a new school is required, to ensure that its delivery is planned in tandem with the delivery of the residential development,</b> in accordance with the phasing requirements of Local Area Plans and Planning Schemes or as may be otherwise required.</i></p>
<p>SD-C195-256 Department of Education &amp; Skills</p>	<p>The Department of Education (DES) support the objectives concerning active travel and schools under Section 7.5.4 of the Draft Plan.</p> <p>The Department of Education (DES) also welcome COS8 Objective 6 (concerning active travel to school) and Objective COS8 Objective 7 relating to provision of parking and drop off areas for schools only as part of a mobility management plan.</p>	<p><b>CE Response:</b></p> <p>It is noted that the supports the objectives concerning active travel and schools under Section 7.5.4 of the Draft Plan.</p> <p>It is further noted that the DES welcomes COS8 Objective 6 and Objective and COS8 Objective 7 which state:</p> <p><i>COS8 Objective 6:</i></p> <p><i>To ensure new schools are designed and located to promote walking and cycling and access to public transport, by implementing the following measures:</i></p> <ul style="list-style-type: none"> <li>→ <i>Ensuring school sites are in locations that are central and accessible to the communities they serve;</i></li> <li>→ <i>Providing infrastructure including safe cycle ways and footpaths;</i></li> </ul>

		<ul style="list-style-type: none"> <li>→ <i>Requiring a mobility management plan for all new schools that prioritises active travel modes and public transport;</i></li> <li>→ <i>Incorporating measures to promote walking and cycling at design stage including permeability and connectivity with the surrounding area through provision of adequate access points for pedestrians and cyclists;</i></li> <li>→ <i>Ensuring the provision of adequate secure bicycle storage;</i></li> <li>→ <i>Working with existing and new schools to increase the proportion of students walking and cycling through the promotion of initiatives such as the 'Green Schools' and 'School Streets' projects. (Refer to Chapter 7, Sustainable Movement)</i></li> <li>→ <i>Introduce measures that would support increased bus services to enable more students to travel to school through public transport.</i></li> </ul> <p><i>COS8 Objective 7:</i></p> <p><i>To facilitate provision of parking for staff and parents and 'drop-off' areas for new schools, only as part of a mobility management plan, where a need has been demonstrated and where active travel modes (walking and cycling) and public transport have been prioritised having regard to the protection of nearby residential amenity.</i></p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p><a href="#">SD-C195-256 Department of Education &amp; Skills</a></p>	<p>The Department of Education (DES) in their submission refer to COS8 Objective 8 which seeks to promote and support schemes that facilitate the shared use of school facilities, such as sports halls, ball courts and all-weather pitches for community use outside of school hours. The DES submit that, equally, where public sports facilities such as pitches are readily</p>	<p><b>CE Response:</b></p> <p>The contents of this submission are noted and acknowledged. The DES recommend the inclusion of an objective that where public sports facilities such as pitches are readily accessible to a school, the school could have use of them during school hours</p>

	<p>accessible to a school, the school could have use of them during school hours and they are available for community use outside of that time. It is considered that this approach would assist the provision of the more urban school model on a smaller footprint and ensure that facilities are available for the school and the community. The DES recommend the inclusion of a specific objective supporting educational campus development, where feasible.</p>	<p>and they are available for community use outside of that time. This is considered appropriate to include an objective in line with this CE Recommendation: ad follows:</p> <p><i>COS8 Objective 11:</i></p> <p><i>To promote and support the use of public sports facilities by urban schools, during school hours, where feasible.</i></p> <p><b>CE Recommendation:</b></p> <p>Insert new objective under COS8 Objective 11 as follows:</p> <p><i>COS8 Objective 11:</i></p> <p><i>To promote and support the use of public sports facilities by <b>urban</b> schools, during school hours, where feasible.</i></p>
<p>SD-C195-256 Department of Education &amp; Skills</p>	<p>The DES recommend the inclusion of a specific objective supporting educational campus development, where feasible.</p>	<p><b>CE Response:</b></p> <p>The contents of this submission are noted and acknowledged. The DES recommend the inclusion of a specific objective supporting educational campus development, where feasible. This is considered appropriate.</p> <p><b>CE Recommendation:</b></p> <p>Insert new objective under COS8 Objective 12 as follows:</p> <p><i>COS8 Objective 12:</i></p> <p><i>To promote and support educational campus development, where feasible.</i></p>
<p>SD-C195-256 Department of Education &amp; Skills</p>	<p>The Department of Education and Skills (DESS) in their submission indicate that it is their policy is to intensively use the sites of existing schools so that their potential is maximized to meet educational requirements. Therefore, it is considered necessary to protect existing schools and the lands around them in order to be able to meet future needs. In this regard, the</p>	<p><b>CE Response:</b></p> <p>The contents of this submission are noted and acknowledged. The DESS request that the entire site (buildings, play area and any green areas) and a land buffer around them (wherever possible), be zoned and mapped for educational use. In addition, the DES request that all future education sites be zoned and</p>

	<p>DESS request that the entire site (buildings, play area and any green areas) and a land buffer around them (wherever possible), be zoned and mapped for educational use. In addition, the DESS request that all future education sites be zoned and mapped so that this information can be picked up by the DESS's GIS system and aid both the DESS and SDCC in the school planning function.</p>	<p>mapped so that this information can be picked up by the DES's GIS system and aid both the DES and SDCC in the school planning function.</p> <p>It is noted that all proposed school sites are mapped on the County Development Plans. However, this may not be in a format which facilitates the DES GIS system. Zoning objectives do not comprise of one land use type such as education, rather they outline a number of uses which would be permitted in principle, open for consideration or not permitted. This would not be appropriate for a single use such as 'school'.</p> <p>In this regard, it considered appropriate to include a new objective under COS8 Objective 13 as follows:</p> <p><i>COS8 Objective 13:</i></p> <p><i>To explore with the Department of Education the potential to develop a GIS mapping layer of all school sites in the County.</i></p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p><a href="#">SD-C195-256 Department of Education &amp; Skills</a></p>	<p>The Department of Education (DES) submits that in considering the implications of the Draft Plan for school accommodation requirements, the DES is cognisant of potentially differing scenarios where variances in factors such as household sizes, demographic profiles and housing delivery rates could significantly alter the future school accommodation requirements. The DES indicate that they also take into account planned school capacity increases in considering the Draft Plan, as well as underlying demographic trends at both primary and post-primary levels which will serve to mitigate additional school place demand arising from the population increases that are envisaged in the Draft Plan. The DES indicate that requirements at primary level are currently assessed on 11.5% of population</p>	<p><b>CE Response:</b></p> <p>The contents of this submission are noted and acknowledged. As per Section 8.10 Primary and Post-Primary Schools, demographic changes in South Dublin County will continue to be monitored by the Department of Education and Skills on an ongoing basis. In addition, the Council has engaged extensively with the Department, as part of the preparation of this Plan, to identify school need in each neighbourhood area based on the population growth identified in the core strategy. This engagement involved the review of school reservations on the 2016 Development Plan maps and within LAPs to ascertain whether they should be retained as part of this Plan and</p>



	and 25 students per classroom. Post-primary requirements are assessed at 7.5% of population numbers.	assessment, based on the core strategy, of whether new schools would be required.  <b>CE Recommendation:</b>  No change to the Draft Plan.
SD-C195-256 Department of Education & Skills	In relation to Tallaght, the Department of Education (DES) indicate that the zoning of a post-primary school site in Tallaght Town Centre is welcome as it is strategically placed to meet the future need. At primary level, it is submitted that, taking into account underlying demographic trends, the DES anticipates that the level of potential increase in school place requirements arising from the increased population outlined in the Draft Plan can be met by existing primary schools (or expansion thereof if required). Similarly, at post-primary level, the DES anticipate that the existing schools will be able to meet school place requirements arising from the Draft Plan. The DES also anticipate that there will be significant educational requirements in Tallaght arising from the proposed regeneration sites.	<b>CE Response:</b>  The contents of this submission are noted and acknowledged.  <b>CE Recommendation:</b>  No change to the Draft Plan.
SD-C195-256 Department of Education & Skills	In relation the Naas Road lands, the Department of Education (DES) indicate that the short-term context for this within the Development Plan period has to be viewed in the longer term masterplan context for the lands. Having regard to the indicated population increase in the Draft Plan for this area of 1,965 people by 2028 (an increase of 140%), the DES indicate It is not clear where the additional population is mainly to be located and therefore which school(s) would best be placed to meet the additional requirement. The DES suggest that, given that the Naas Road Masterplan has to be developed, it would seem practical that plans are made to ensure that existing school(s) can cater for the additional population if at all possible. Therefore, it is submitted that engagement between SDCC and the Department will be necessary on this matter. At post-	<b>CE Response:</b>  The contents of this submission are noted and acknowledged. With regard to the Naas Road lands, CS2 Objective 2 states:  <i>CS2 Objective 2:</i>  <i>To facilitate a co-ordinated approach and vision to any future sustainable development of the Naas Road Framework area in consultation with Dublin City Council, and all relevant stakeholders including the local community, and ensure that the needs of the existing and new community will be met, and the provision of necessary community and physical infrastructure is delivered in tandem with any new development.</i>

	<p>primary level, the DES anticipate that existing schools in settlements such as Walkinstown and Drimnagh will meet the requirements arising from the increased population in the draft plan.</p>	<p>It is submitted that CS2 Objective 2 above, together with the policy and objectives set out under Policy COS8, and the ongoing liaison with the Department comprehensively address the issues as raised.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p>SD-C195-256 Department of Education &amp; Skills</p>	<p>In relation to Templeogue, Walkinstown, Rathfarnham, Firhouse, the Department of Education (DES) note that the 9% population increase indicated for this neighbourhood in the Draft Plan equates to 15% of the overall population increase for South County Dublin. The DES in their submission details the three new school sites provided in this area, as referenced in the Draft Plan, as follows:</p> <ul style="list-style-type: none"> <li>• the site in Knocklyon is to provide a permanent building for Gaelscoil Chnoc Liamhna and this building is currently under construction</li> <li>• the site on Stocking Avenue is to cater for the future needs of the Ballycullen/Oldcourt area where there is further significant proposed residential development that is projected to generate a school requirement for this community in the relative short-term. The Department regards this site as vital to meet the future needs of the area and it is readily deliverable to meet a school need in terms of location, access and services</li> <li>• the site on Hunter's Road is to provide a permanent building for Firhouse Educate Together Secondary School. The plans are at detailed design stage and the projected is being expedited as it is required urgently.</li> </ul>	<p><b>CE Response:</b></p> <p>The contents of this submission are noted and acknowledged. The Draft Development Plan maps set out the 'School Sites' in this area as referred to by the DES in their submission.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p>SD-C195-256 Department of Education &amp; Skills</p>	<p>In relation to Clondalkin, Clonburris, Grange Castle, the Department of Education (DES) note that the Draft Plan</p>	<p><b>CE Response:</b></p>

	<p>population increase of 24% for this neighbourhood equates to 23% of the overall population increase for South County Dublin. The DES in their submission details the seven new school sites provided in this area, as referenced in the Draft Plan, as follows:</p> <ul style="list-style-type: none"> <li>• Site for a new primary school on the grounds of Deansrath Community College. A decision on the timing of the establishment of this school will be made based on demographic requirements.</li> <li>• Six new school sites in the Clonburris SDZ. These six sites are to cater for 8 schools (4 primary and 4 post-primary). Two of the schools (a primary and post primary) are already constructed and operational (Lucan East ETNS and Kishogue Community College). There is an immediate requirement to construct a permanent building for the next school, a post-primary school, Griffeen Community College and one of the post-primary sites is proposed. In this regard, architectural planning is well advanced and it is hoped to obtain planning permission and proceed to construction as soon as possible for this next school in the SDZ. The Department is in discussions with the Council on the provision of the site.</li> </ul> <p>The DES indicate that school place requirements in Clondalkin will continue to be monitored actively, such as development on brownfield lands which will generate school place requirements, as part of an ongoing liaison between the DES and SDCC.</p>	<p>The contents of this submission are noted and acknowledged. The Draft Development Plan maps set out the 'School Sites' in this area as referred to by the DES in their submission.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p>SD-C195-256 Department of Education &amp; Skills</p>	<p>In relation to Lucan/Palmerstown/ Adamstown, the Department of Education (DES) note that the Draft Plan population increase of 16% for this neighbourhood equates to 20% of the overall population increase for South County Dublin. It is noted that Adamstown SDZ is the main focus of the new residential development, which is proceeding apace, and that there are the two remaining primary school sites in the Adamstown SDZ – one at Tandy's Lane where planning permission for a new school there has recently been secured and one at Airlie, which</p>	<p><b>CE Response:</b></p> <p>The contents of this submission are noted and acknowledged. The Draft Development Plan maps set out the 'School Sites' in this area as referred to by the DES in their submission.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>

	<p>is to cater for a projected future need and it will be activated when required.</p>	
<p>SD-C195-256 Department of Education &amp; Skills</p>	<p>In relation to Citywest/Saggart/Rathcoole/Newcastle, the Department of Education (DES) note that the Draft Plan population increase of 67% for the four combined settlements, which equates to 26% of the County's population growth.</p> <p>With regard Post-primary requirements for the Citywest/Saggart/Newcastle/Rathcoole, the DES indicate that they will consider the needs of the neighbourhood as a whole. The DES indicate that up until recently, there was one post-primary school for the neighbourhood, located in Rathcoole. The growing requirement for post-primary school places arising from the population increase in the entire neighbourhood (Citywest, Saggart, Newcastle and Rathcoole) prompted the establishment of a new post-primary school to meet the growing need in the neighbourhood. This school, Coláiste Pobail Fóla, opened in September 2020. The DES note and welcome Specific Local Objective 1 in regard to primary and post-primary schools (COS8 SLO1) to "identify a site for the appropriate location of a new post-primary school within the Neighbourhood Area of Citywest/Saggart/Rathcoole/Newcastle to provide for the needs identified for the catchment area by the Department of Education (and Skills)". The DES submit that a highly suitable well-located site is already identified, namely the State-owned (ETB) site on Fortunestown Lane and planning permission has already been obtained to construct a permanent building for the new post-primary school on this site (as well as a primary school). The new post-primary school will meet needs in the short-term but based on the projected growth of the entire neighbourhood, there is a projected further need for a significant increase in post-primary provision to cater for the needs of the</p>	<p><b>CE Response:</b> The comments by the Department are noted.</p> <p>In particular, it is noted that the Department confirms that the provision for primary schools meets the demand for the Plan period with planning permission for a new 16 classroom primary school recently obtained on the State-owned site on Fortunestown Lane. The Department also notes the further school site identified for the Boherboy lands.</p> <p>With regard to post primary schools, the Department notes the opening of Coláiste Pobail Fóla in September 2020. The permission obtained on the Fortunestown Lane ETB site will meet the demands for post primary in the short-term but it is noted that there is a projected need for a significant increase in post-primary provision to cater for the needs of the neighbourhood. This has been addressed in the Draft Plan through COS8 SLO1 which recognises that there is a need to identify a location for a new post primary school within the Citywest/Saggart/Rathcoole/Newcastle neighbourhood area. The Draft Development Plan Maps identifies 2 no. School Sites in the Citywest/Fortunestown area – 1 no. site off Fortunestown Lane and 1 no. site on lands situated between Carrigmore Avenue and Boherboy Road.</p> <p>The Council is committed under Policy COS8(a) to work in conjunction with the Department of Education and Skills to promote and support the provision of primary and post-primary schools in the County to reflect the diverse educational needs of</p>

	<p>neighbourhood. The DES indicate that a further post-primary school will be required in the medium term to meet this projected future need and request that consideration be given now to zoning a site in that regard. It is further submitted by the DES in their submission that the proposed school in Tallaght Town Centre could also contribute to meeting the projected need.</p> <p>The submission also notes that the draft plan indicates that Citywest/Fortunestown will provide 16% of the County's projected housing growth up to 2028. In terms of short-term primary school requirements, the submission notes planning permission for a new 16 classroom primary school has been obtained on the State-owned site on Fortunestown Lane. This school will be ideally positioned to meet the projected need in Fortunestown in the period of the plan. The DES also notes the proposal for a significant SHD within the Fortunestown LAP lands (in the townland of Boherboy, Saggart Road) adjoining a zoned proposed primary school site in this area.</p>	<p>communities, and; under Policy COS8(b) to engaging with the Department of Education and Skills and support the Department's School Building Programme by actively identifying sites for primary and post primary schools at suitable locations, based on forecast need.</p> <p>It is considered, therefore, that the provisions of the Draft Plan, including COS8 SLO 1 and Policies COS8(a) and COS8(b) satisfactorily address the issues raised by the DES in respect post-primary requirements for the Citywest/Saggart/Newcastle/Rathcoole area in the medium term to meet the projected future need.</p> <p><b>CE Recommendation:</b> No change to the Draft Plan</p>
<p>SD-C195-256 Department of Education &amp; Skills</p>	<p>The submission notes that the draft plan projects that Saggart will have increased by 366 people to a total of 3,499 by 2028 (an increase of 11%). The town of Saggart is served by one mainstream primary school. Taking into account underlying demographic trends, the DES anticipates that the level of potential increase in school place requirements arising from the increased population can be met by the existing facility.</p>	<p><b>CE Response:</b></p> <p>The contents of this submission are noted and acknowledged.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p>SD-C195-256 Department of Education &amp; Skills</p>	<p>The submission notes that the draft plan projects that Newcastle will have increased by 1,946 people to a total of 5,039 by 2028 (an increase of 63%). The town of Newcastle is served by one mainstream primary school. It has a new 24 classroom school building built in 2015 on a Minister-owned site of 2.98 hectares.</p>	<p><b>CE Response:</b></p> <p>The contents of this submission are noted and acknowledged. As noted in the submission, a new primary school was built in</p>

	<p>The DES submission includes a map of the site. The DES request that this site be zoned for education. The DES submit that, based on the projected population growth of Newcastle, there is a potential requirement for additional school places. If this arises, it is considered by the DES that the extent of the increase requirements will have to be assessed and options considered in how best to meet them. These include the potential for further utilizing the Minister-owned site or whether the need was at a level that would necessitate the establishment of a new school on a different site. In this regard, it is understood that there is another potential school site in Newcastle.</p>	<p>Newcastle. In addition, the Newcastle Local Area Plan 2012 provides for the following:</p> <p><i>A primary school site with playing fields, staff parking and pick up/ drop off facilities shall be reserved close to the recently established population base at Ballynakelly and adjacent to the Countryside Village Park (Taobh Chnoic Park). (Objective TC8)</i></p> <p>Planning permission was granted by An Bord Pleanála under ABP-305343-19 for a strategic housing development on lands at Newcastle South and Ballynakelly, Newcastle. The development as granted includes the reservation of a school site (1.5 hectares) in line with the provisions of the Newcastle LAP.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Plan</p>
<p>SD-C195-256 Department of Education &amp; Skills</p>	<p>The submission notes that the draft plan projects that Rathcoole will have increased by 2,058 people to a total of 6,409 by 2028 (an increase of 47%). At primary level, the town of Rathcoole is served by three mainstream primary schools (one of which was established in 2020 in order to meet demographic need). The submission indicates that SDCC is to undertake a masterplan for lands in Rathcoole which include the proposed school site. The masterplan will inform the planning application for the planned primary school. Taking into account the new school, the DES anticipates that the level of potential increase in school place requirements arising from the increased population can be met by existing facilities.</p>	<p><b>CE Response:</b></p> <p>The contents of this submission are noted and acknowledged.</p> <p>The proposed rezoning of lands to the south of Rathcoole in CE Response: to CS10 SLO1 in the Draft Plan include a new school site.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p>SD-C195-256 Department of Education &amp; Skills</p>	<p>The Department of Education (DES) submit that the existing school network is of paramount importance in meeting the future projected needs. This is particularly critical in the</p>	<p><b>CE Response:</b></p> <p>The contents of this submission are noted and acknowledged.</p>

	<p>established areas where dispersed infill and possibly brownfield development will take place and create a more dense, populous neighbourhood. For this reason, the DES request that all existing school sites and a land buffer around them (wherever possible) should be zoned and protected to meet the future educational needs in South County Dublin. Plans are currently underway for new school provision on identified sites in Citywest, Rathcoole, Clonburris, Adamstown and Firhouse. Separately, sites to cater for future projected school needs are zoned in Citywest, Tallaght, Clondalkin, Clonburris, Adamstown and Firhouse. There is also an identified potential increased requirement for Newcastle. Requirements are likely to emerge arising from the development at Naas Road during the period of the plan (up to 2028). Similarly, requirements may arise arising from infill development in the established urban areas and this will require engagement between the DES and the Council. Longer-term, the big regeneration projects at Naas Road and Tallaght will result in very significant populations in these areas with resulting educational requirements.</p>	<p>As set out above, all proposed school sites are mapped on the County Development Plans. However, this may not be in a format which facilitates the DES GIS system. Zoning objectives do not comprise of one land use type such as education, rather they outline a number of uses which would be permitted in principle, open for consideration or not permitted. This would not be appropriate for a single use such as 'school' and therefore a school zoning is not appropriate.</p> <p>A previous CE Recommendation: has provided for a new objective under COS8 Objective 13 as follows:</p> <p><i>COS8 Objective 13:</i></p> <p><i>To explore with the Department of Education the potential to develop a GIS mapping layer of all school sites in the County.</i></p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan. [CE Recommendation: to include a new objective already incorporated in previous CE Response: above]</p>
<p>SD-C195-256 Department of Education &amp; Skills</p>	<p>The Department of Education (DES) highlight that no requirement has been identified for a special school in their submission as it focused on demographic need. However, if a specific need in regard to a special school arises, the DES indicate that they will contact the Council.</p>	<p><b>CE Response:</b></p> <p>The contents of this submission are noted and acknowledged.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p>SD-C195-256 Department of Education &amp; Skills</p>	<p>The Department of Education (DES) welcomes the ongoing engagement with SDCC in respect to school accommodation requirements across the county and will continue to work closely with the Council in meeting the challenges associated</p>	<p><b>CE Response:</b></p> <p>It is noted that the DES welcomes the ongoing engagement with SDCC in respect to school accommodation requirements across</p>



	<p>with the provision of new schools and the redevelopment /extension of existing schools.</p>	<p>the county and will continue to work closely with the Council in meeting the challenges associated with the provision of new schools and the redevelopment /extension of existing schools.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p>SD-C195-141 Jones Investments Limited</p> <p>SD-C195-235 McCann Fitzgerald</p>	<p>This submissions calls for the Removal of the S (School) Zoning on lands at Stocking Avenue so that the underlying 'New Residential' zoning can be fulfilled.</p> <p>In this regard, it is submitted that there has been no intent shown to locate a school on the Site, let alone a plan for the school to be developed on a phased basis. It is submitted that it is now likely that the surrounding 'new residential' land will be developed prior to a school being developed on the subject site and the school objective should be located elsewhere (e.g. at the 'School ("S")'objective site c. 600 m away) so that a proper phasing plan can be put in place.</p> <p>The submission refers to Section 1.5 of the Draft Development Plan Guidelines, which states that 'seeking to prioritise development at a location where there is an obvious deficit in services and/or infrastructure and without a clear commitment and timescale for resolution is unlikely to be appropriate'. In this regard, it is submitted that SDCC should prioritise development at serviced lands, like the subject site, which would be consistent with section 15(1) of the Planning Acts, under which SDCC is obliged to take steps to secure the objectives of the plan. It is further submitted that SDCC has assumed for 21 years that the lands will be required for a primary school, but this assumption has been proven to be wholly unjustified and has placed a burden of</p>	<p><b>CE Response:</b></p> <p>The contents of this submission are noted and acknowledged.</p> <p>The subject site is zoned for residential development (RES-N) which is "to provide for new residential communities in accordance with approved area plans". It is submitted that the zoning objective has been frustrated and prevented by a Specific Local Objective (SLO) to provide a primary school that is contained in various South Dublin County Council (SDCC) development plans since 2005.</p> <p>The site on Stocking Avenue is to cater for the future needs of the Ballycullen/Oldcourt area where there is further significant proposed residential development that is projected to generate a school requirement for this community in the relative short-term. Education facilities have a central role to play in developing sustainable and balanced communities. In their submission to the Draft Plan the Department of Education and Skills have stated that they regard this site as vital to meet the future needs of the area and it is readily deliverable to meet a school need in terms of location, access and services.</p> <p>The submission proposes a school site c.600m from the Stocking Lane site. The proposed school site mentioned is indicated as being c.600m from the Stocking Lane site and is located on land Zoned Objective RU – "To protect and improve rural amenity and to provide for the development of agriculture". It is considered that, given the submission from the Department</p>



sterilization on the subject site for 21 years without a clear commitment or timescale for resolution.

The submission refers to Section 11(3)(c) of the Planning Acts, as highlighted in the Draft Development Guidelines, and the need to plan from an evidence base, with the plan-making process to include “[a] clear and transparent analysis of an existing baseline of plan-related information with a focus on an examination of the effectiveness of previous plans in achieving their stated objective”. In this regard, it is submitted that this approach has never been applied in relation to the SLO.

The submission raises concerns regarding the amended wording in the SLO which preserves the site for a school, as opposed to a primary school, as the DES indicated previously that the site is not large enough to properly accommodate a post-primary school.

It is submitted that the Draft Plan cannot lawfully retain the SLO without clear evidence, guidance and analysis of why: (A) the Site was initially selected as appropriate for the SLO; (B) the Site is still considered the most appropriate site to be subject to the SLO; and, (C) the SLO was amended to provide for a school, rather than a primary school.

It is submitted that Jones Investments Ltd have shown a repeated willingness to facilitate the development of the subject site as a school and has tried to work with SDCC and the DES to achieve the SLO and expended considerable resources.

of Education, there is no justification for the removal of the proposed school site as requested by the submission.



Figure 1: Extract taken from Draft SDCC Development Plan – Map Sheet 10 identifying the Specific Objective – Proposed School and Zoning Objective RES-N.

This correlates with COS8 Objective 2 & 3 which states:

	<p>The submission refers to the High Court judgement <i>Kemper v. An Bord Pleanala</i> [2020] IEHC 601 and the legislative requirements under Section 11 (3) (c) to carry out the necessary consultation and submits that the SLO would be open to challenge if the legislation has not been adhered to.</p> <p>The submission refers to the High Court judgements <i>Reid v. Industrial Development Agency</i> [2015] 4 IR 494 and <i>Heaney v. Ireland</i> [1994] 3 IR 593 which highlight issues around proportionality of the interference relevant to the authorised aim. It is submitted that the SLO fails in relation to this criterion; is entirely unfair, and based on considerations that have no evidential basis; impairs the owner's rights to the maximum extent preventing them from any use of the lands, burdening them to remain custodian of the lands and incur related costs, without making any compensation or return for this disproportionate interference.</p> <p>The submission indicated that it would be unlawful for SDCC to make a development plan that retains the SLO, or changes it to refer to merely a school, where:</p> <ul style="list-style-type: none"> <li>• no evidential basis for the SLO has been disclosed;</li> <li>• as a matter of fact, proven by 21 years of inaction, the subject site is not required for a primary school, and is unfit for a post-primary school;</li> <li>• when a decision to locate a school in the area was made in 2012, the Site was not selected;</li> </ul>	<p><b>COS8 Objective 2:</b></p> <p>To facilitate the development of new schools, the re-development of existing schools and extensions planned as part of the Government's School Building Programme.</p> <p><b>COS8 Objective 3:</b></p> <p>To require schools to be provided in new communities on a phased basis in tandem with the delivery of residential development, in accordance with the phasing requirements of Local Area Plans and Planning Schemes or as may be otherwise required.</p> <p>The Planning Department have been in discussions with the Department of Education and Skills (DES) in preparation of the Draft Plan, as per Policy COS8(a) and COS8(b):</p> <p><b>Policy COS8(a):</b></p> <p>Work in conjunction with the Department of Education and Skills to promote and support the provision of primary and post-primary schools in the County to reflect the diverse educational needs of communities.</p> <p><b>Policy COS8(b):</b></p> <p>Engage with the Department of Education and Skills and support the Department's School Building Programme by actively identifying sites for primary and post primary schools at suitable locations, based on forecast need.</p> <p>The Draft Plan has a single symbol for schools. This is a change from the 2016 County Development Plan which had a separate symbol for primary and post primary schools. In discussion with the Department, it was agreed that a single symbol was a preferred approach, providing for a degree of flexibility should needs change over the course of the plan.</p>
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	<ul style="list-style-type: none"> <li>• no meaningful consultation with education service providers has been completed, in breach of section 11(3)(c) of the Planning Acts;</li> <li>• the Site is zoned for residential development, which zoning objective has been frustrated by the SLO, and by the evident disinterest in acquiring the lands for that school purpose,</li> <li>• in breach of section 15(1) of the Planning Acts; and,</li> <li>• the SLO has sterilised the lands for 21 years, in breach of the owners' constitutionally protected property rights. The SLO impairs the owners' rights to the maximum extent, preventing the owners from any use of the lands, burdening them to remain custodian of the lands and incur those costs, without making any compensation or return for this disproportionate interference.</li> </ul> <p>For all of these reasons, the submission insists that SDCC remove the SLO from these lands.</p>	<p><b>Ballycullen – Oldcourt Local Area Plan 2014</b></p> <p><b>5.4.8 School Provision</b></p> <p>The Department of Education and Skills indicate that there is currently a need for a new primary school facility to serve existing populations in the surrounding area of the Plan Lands and that development of the Plan Lands will generate the need for a second new primary school facility.</p> <p>The Planning Department have been in discussions with the Department of Education and Skills (DES) in preparation of the Draft Plan.</p> <p>As stated above, The Department of Education and Skills regards this site as vital to meet the future needs of the area and it is readily deliverable to meet a school need in terms of location, access and services.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
<p><a href="#">SD-C195-265 Deirdre tierney</a></p>	<p>The submission believes education and awareness should be an on-going process that compliments the CDP and all underpinning plans and strategies. Education and awareness programmes should be cross-cutting and be run to increase public knowledge and bring about behavioral changes which may result in the reduction of litter, reduction of water pollution for example. CE Recommendation:s on this point include:</p> <ul style="list-style-type: none"> <li>- Engagement of a County Development Plan officer;</li> <li>- Development of a Cross cutting education and awareness programme;</li> <li>- Community ambassadors;</li> <li>- Better use of PPN and other voluntary organisations;</li> <li>- Need for on-going education, awareness, communication, outreach programme to increase public engagement with the</li> </ul>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted. However, this is beyond remit of the Draft County Development Plan, which is strategic landuse plan.</p> <p>The Council has worked closely with the Department of Education since 2012 under a nationally agreed Memorandum of Understanding (MoU) and will continue to do so. The consultation strategy for the plan has aimed to maximise the use of the PPN network as a mechanism for engaging in all consultation phases of the plan process to date. The Draft Development Plan has been developed in consultation with all Departments within the Council, including the Parks Department as well as Biodiversity</p>

	<p>process of arriving at a CDP;  - Community based advocacy officers for all plans and strategies;  More human resources to implement CDP officer, Biodiversity officer, planning inspectors and tree officer.</p>	<p>and Conservation Officers to ensure a comprehensively informed approach to all layers of the Plan and has also undertaken a comprehensive public consultation exercise.  Human resources are a matter for the Chief Executive.  <b>CE Recommendation:</b>    No Change to the Draft Plan.</p>
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Higher Level Education and Further Education Facilities		
Submission No.	Submission Summary	CE response and recommendation
<p><a href="#">SD-C195-154 Tallaght Community Council</a></p>	<p>The submission requests that COS9 Objective 4 be amended to read as: "To promote..... centre for learning, education and employment".</p> <p>With regards to COS9 Objective 9 - Need for a new University campus for South Dublin County University.</p> <p>The submission raises concerns over the expansion of the university sector already in Dublin – and states that this move could undermine the position of TUD Tallaght campus university in Tallaght, the County town and indeed the whole region.</p>	<p><b>CE Response:</b></p> <p>The contents of this submission are noted. The submission requests that COS9 Objective 4 be amended to include the word ‘learning’, as follows:</p> <p><b>COS9 Objective 4:</b></p> <p>“To promote and facilitate the development of Tallaght as a centre for education and employment”</p> <p>To</p> <p>“To promote and facilitate the development of Tallaght as a centre for <b>learning</b>, education and employment”.</p> <p>The submission notes the concerns with regards to COS9 Objective 9, a need for a new University campus for South Dublin County University and states that this move could undermine the position of TUD Tallaght campus university in Tallaght, the County town and indeed the whole region. It is considered that TUD is well</p>

		<p>established in its own right and may benefit from the proximity of a new university in the County.</p> <p>It is noted that there is no COS9 Objective 9 in the Draft Development Plan. Perhaps COS9 Objective 8 should be referred to in this instance which states:</p> <p><b>COS9 Objective 8:</b></p> <p>‘To investigate with the relevant educational providers, the need for a new university campus within the Naas Road area and to support, promote and facilitate a South Dublin County University Campus within the Naas Rd Framework Plan or any superseding plan should such a need be identified.’</p> <p>TUD Tallaght is a well established campus and it is not considered that any future university campus elsewhere in the County would undermine its status or viability.</p> <p><b>CE Recommendation:</b></p> <p>Amend COS9 Objective 4 to include the addition of the word learning.</p> <p><b>COS9 Objective 4:</b></p> <p>“To promote and facilitate the development of Tallaght as a centre for <b>learning</b>, education and employment”.</p>
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Arts and Culture Facilities		
Submission No.	Submission Summary	CE response and recommendation
SD-C195-108 E.M Hurley	A submission expresses support for COS11 Objective 9 to pursue the development of a Heritage Centre in Lucan village as this would support the ‘Destination Town’ status envisaged	<b>CE Response:</b>

	<p>for Lucan. This centre should be ideally located within the village and in an unused building to bring it back to community use.</p>	<p>A submission welcomes the inclusion of <b>COS11 Objective 9</b> which states:</p> <p>'To pursue the development of the Heritage Centre in Lucan Village'.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
<p>SD-C195-222 Tallaght Community Council</p>	<p>Submission looks for the inclusion of an SLO for Public Art for Tallaght, the County Town - deliver a series of complimentary public art pieces, that tell the rich and varied history of Tallaght, back as far as mythological Ireland. The people, themes and activities, topics include Fionn &amp; Tir na n-Óg, the Leinster Road Races in Tallaght in the 1930s, Tallaght writers.</p>	<p><b>CE Response:</b></p> <p>The submission requests the inclusion of a new SLO.</p> <p>'Public Art for Tallaght, the County Town - deliver a series of complimentary public art pieces, that tell the rich and varied history of Tallaght, back as far as mythological Ireland. The people, themes and activities, topics include Fionn &amp; Tir na n-Óg, the Leinster Road Races in Tallaght in the 1930s, Tallaght writers'.</p> <p>The Draft Development Plan discusses this under Section 8.13 'Arts and Cultural Facilities' which include a number of relevant objectives.</p> <p><b>COS11 Objective 4:</b></p> <p>'To facilitate the continued development of arts and cultural facilities throughout the County and to support the objectives and implementation of the South Dublin County Arts Strategy (2016-2020) and the South Dublin County Cultural and Creativity Strategy (2018-2022) and any superseding plans and strategies'.</p> <p>Section 3.2 of the Arts Development Strategy 2016-2020 (due to be updated late 2021) Promote the Councils expanding Public Art Collection and its reflection of the unique context of South Dublin County.</p> <ul style="list-style-type: none"> <li>➤ Promote the Councils publicly accessible public art database South Dublin County Public Art</li> </ul>

		<p>www.southdublin.ie/artsworks/ and develop this resource of existing public art and documentation as a tool for education and research purposes.</p> <ul style="list-style-type: none"> <li>➤ Create links with national databases such as PublicArt.ie and with local tourism and heritage websites.</li> </ul> <p>The Council will encourage and support proposals for the creation and installation of public art in suitable and accessible public places.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan</p>
SD-C195-120 Arts Council	<p>The Arts Council in their submission set out their role and function as defined by the Arts Act 2003 and which includes stimulating public interest in the arts, assisting in improving standards in the arts and working in partnership with artists, arts organisations, public policy makers and others to build a central place for the arts in Irish life. The Arts Council submit that under Act, the Arts Council has a material and distinctive contribution to make in the formulation of spatial policy for our evolving society.</p> <p>The Arts Council indicate that they are guided by their own strategy 'Making Great Art Work, 2016 - 2025', which sets forth a vision for Ireland in which the Arts are valued as; central to civic life; as a hallmark of local and national identity; and as a sign and signature of our creativity as a nation. In addition, the Arts Council indicate that they are currently preparing their own 'Spatial Policy Framework', which will forefront the importance of place and spaces where people live, work and come together for cultural participation, as an essential component of life satisfaction and fulfilment living in Ireland today. The Spatial Policy will highlight the Arts Council's key role as a Prescribed Body in the Irish planning system and set</p>	<p><b>CE Response:</b></p> <p>The contents of this submission are noted. The Arts Council note and welcome the provisions of COS11 Objective 4.</p> <p><b>COS11 Objective 4:</b></p> <p>To facilitate the continued development of arts and cultural facilities throughout the County and to support the objectives and implementation of the South Dublin County Arts Strategy (2016-2020) and the South Dublin County Cultural and Creativity Strategy (2018-2022) and any superseding plans and strategies</p> <p>The Arts Council would welcome greater recognition and collaboration in the spatial approach between the Development Plan and these strategies, in particular the Arts Development Strategy which has a basis in legislation as mentioned. It is considered that the Draft Plan has included sufficient policy and objectives to facilitate the spatial approach and collaboration discussed in the submission. The detail of implementation will be considered through the role of the Arts Officer and through the Development Management system in planning. However, discussions between the Planning Department and the arts</p>

	<p>out a clear vision for how it endeavours to see the arts and culture more strongly integrated into spatial development frameworks, and land uses planning policy.</p> <p>The Arts Council submit that planning for arts and culture means more than the development of tangible infrastructure and services such as theatres, libraries and museums or the preservation of cultural and built heritage. It is considered that arts and culture can play a contributing role to the social and economic development of places by creating vibrant places to live and creating social cohesion through festivals and events, community cultural activity, tourism interest and local identity and association with a particular place. In addition, the Arts Council submit that the provision of arts and culture in formal and informal spaces, for example, in the built and natural environment such as parks and open spaces, can make a significant contribution towards social, cultural and physical wellbeing to the community. The Arts Council refer in their submission to the definition of cultural diversity defined by UNESCO as; “A set of distinctive spiritual, material, intellectual, and emotional features of society or a social group, and that it encompasses, in addition to art and literature, lifestyles, ways of living together, value systems, traditions and beliefs.” (UNESCO, Universal Declaration on Cultural Diversity)</p> <p>With regard to the Draft Plan, the Arts Council welcome the value given to ‘arts and culture’ infrastructure, the recognition of culture and the arts as social/community infrastructure and a vital part of all neighbourhoods that contributes greatly to the social fabric and quality of life and the support for the development of arts at a local level. In addition, the Arts Council welcomes the acknowledgement of the South Dublin</p>	<p>officer resulted in the inclusion of the new objective in the Draft Plan COS11 Objective 8:</p> <p>‘To prepare a feasibility study for the development of Arts and Culture Infrastructure within the County, taking account of transport links’.</p> <p>The Arts Council supports the proactive approach to provide for social and community infrastructure (Section 8.4) including a Social/Community Infrastructure Audit that was undertaken to inform the plan but they have indicated there appears no clear detailed policy mechanism or structure to indicate how those objectives can be achieved and implemented. The following Objectives in the Draft Plan support the provision of arts and culture infrastructure:</p> <p>COS4 Objective 18:</p> <p>To make available suitable unused Council-owned brownfield sites and buildings to sport, arts and community groups on a temporary or long-term lease basis, where feasible.</p> <p>COS11 Objective 7:</p> <p>To support the arts and culture by facilitating community groups to use vacant or unused council premises for exhibitions, performances and other uses related to community arts, where suitable.</p> <p>COS11 Objective 9: To pursue the development of a Heritage Centre in Lucan Village area.</p> <p>The Council is committed to the delivery of social and community infrastructure and will continue to pursue a range of funding and delivery mechanisms. As outlined in the Draft Plan, these include:</p>
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	<p>Arts Development Strategy 2016-2020 and the undertaking of a social/community infrastructure audit which has informed specific social infrastructure policies. That said the Arts Council would welcome greater integration of the strategy approach and CE Recommendation:s set out under the South Dublin Arts Development Strategy 2016-2020 (and its successor) which is mandated through legislation under the Arts Act 2003. The South Dublin Culture and Creativity Strategy 2018-2022 is also important to reference into the development plan, and, perhaps greater clarity on how the Social / Community Infrastructure Audit has influenced policies and objectives related to 'arts and culture'. In this regard, the Arts Council respectfully requests that the following observations are considered in the finalisation of the South Dublin County Development Plan 2022-2028:</p> <p>1. Responsiveness to and Collaboration with County Arts Strategies</p> <p>The Arts Council note and welcome the provisions of COS11 Objective 4 which seeks to support the implementation of the South Dublin Arts Development Strategy 2016-2020 (and its successor) and the South Dublin Culture and Creativity Strategy 2018-2022. That said, the Arts Council would welcome greater recognition and collaboration in the spatial approach between the Development Plan and these strategies, in particular the Arts Development Strategy which has a basis in legislation as mentioned. While the draft Development Plan sets out a number of policies and objectives which seek to promote and facilitate arts and culture infrastructure, the Plan does not make any specific reference to or provisions for the spatial objectives outlined in the South Dublin Arts Strategy, for example to incorporate cultural provision into Local Area Plans and Capital Budgets,</p>	<ul style="list-style-type: none"> <li>• Funding through the Council's financial resources, including development levy contributions.</li> <li>• Grant funding such as the Urban Regeneration Development Fund (URDF) and Local Infrastructure Housing Activation Fund (LIHAF).</li> <li>• Supporting other public agencies such as the Health Services Executive (HSE) or Department of Education and Skills (DES).</li> <li>• Working in partnership with other public and private sector stakeholders, where appropriate.</li> </ul> <p>It is also noted that COS11 Objective 3 and COS11 Objective 2 provide mechanisms for the delivery of public art:</p> <p><b>COS11 Objective 2:</b> To support the government 'Per Cent for Art' scheme for publicly funded capital, infrastructural and building developments.</p> <p><b>COS11 Objective 3:</b> To require new commercial developments greater than 5,000 sqm in size, in the case of non-residential development, and in excess of 500 units in the case of residential development, to incorporate a physical artistic feature into the scheme to improve the built environment / public realm, which could include high quality features within the environment / landscaping, in agreement with the Council, and to invite local artists to participate where appropriate by way of open competition.</p> <p>With regard to the provision of social infrastructure in South Dublin County the RSES advocates for a wide range of services and facilities to meet local needs and contribute towards an improved quality of life for all residents, including:</p> <p><i>"facilities in relation to health, education, libraries, childcare, community centres, play, youth, recreation, sports, cultural</i></p>
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	<p>or guidance for developers regarding the feasibility of arts facilities arising from planning gain, or the Culture and Creativity Strategy in which there is an objective which seeks to 'Advocate for the role of culture and creativity as a central part of the vision for the regeneration of public and private spaces'. The Arts Council would welcome greater reference to and support of the specific objectives in the two strategies which seek to facilitate the provision of arts and culture infrastructure as essential social infrastructure that contributes to the quality of life of communities.</p> <p>2. Implementation of Development Plan Policy Objectives</p> <p>The Arts Council supports the proactive approach to provide for social and community infrastructure (Section 8.4) including a Social/Community Infrastructure Audit that was undertaken to inform the plan. However, the Arts Council would welcome greater clarity in the strategy approach to ensure that 'arts and culture' infrastructure will be provided for over the plan period. In terms of the Social / Community Infrastructure Audit, it is unclear how the outcome of that audit has informed and provided for policies and objectives for the provision arts and culture infrastructure in the draft Plan. The clarification of funding and delivery mechanisms in Section 8.4.2 (pp289) is welcomed. However, in the absence of reasonable clarity or certainty under those suggested arrangements, the Arts Council would welcome definitive or target programmes, commitments or assigned responsibility for delivery of such infrastructure which might facilitate specifically, arts and culture infrastructure during the lifetime of the plan. For example, the Arts Council would welcome, in instances where appropriate, that the social infrastructure facilities detailed under Section 8.4.1 consider the provision of associated outdoor spaces or dual use of open spaces that could facilitate arts and culture provision. The Arts Council</p>	<p><i>facilities, policing, places of worship, burial grounds and emergency facilities".</i></p> <p>There are a number of regional policy objectives (RPOs) within the RSES which support the provision of and access to social infrastructure specifically RPO 9.23:</p> <p>Promote and facilitate the role of arts and culture in recognition of its importance to people's identity and the potential for economic development through a unique cultural tourism offering throughout the Region.</p> <p>The Arts Council welcomes the approach taken to inform such policies through the use of the Social/ Community Infrastructure Audit. The Arts Council would encourage the local authority to build upon this approach to prepare a county register of arts and cultural assets which would include clarification of infrastructure such as arts centres, museums, heritage buildings, or townscapes, or public spaces and locations which either individually or collectively, contribute to access to , and/or provision of arts and culture in the future.</p> <p>The proposed register is noted but this is a matter outside the remit of the County Development Plan and is better placed as an objective of the South Dublin County Arts Strategy. Support for that strategy is provided for in the Draft Plan through:</p> <p>To facilitate the continued development of arts and cultural facilities throughout the County and to support the objectives and implementation of the <i>South Dublin County Arts Strategy (2016-2020)</i> and the <i>South Dublin County Cultural and Creativity Strategy (2018-2022)</i> and any superseding plans and strategies.</p> <p>It is considered that the Draft Plan, as a strategic land use policy document, contains appropriate policies to support art and cultural facilities alongside the mechanisms for their achievement.</p> <p><b>CE Recommendation:</b></p>
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	<p>welcomes the number of specific objectives which support the provision of arts and culture infrastructure. However, there appears no clear detailed policy mechanism or structure to indicate how those objectives can be achieved and implemented. For example, reference is made to the following policy objective examples;</p> <ul style="list-style-type: none"> <li>• Objective COS4 Objective 18 'To make available suitable unused Council-owned brownfield sites and buildings to sport, arts and community groups on a temporary or long-term lease basis, where feasible' could be implemented throughout the plan period.</li> <li>• COS11 Objective 7: To support the arts and culture by facilitating community groups to use vacant or unused council premises for exhibitions, performances and other uses related to community arts, where suitable.</li> <li>• COS11 Objective 9: To pursue the development of a Heritage Centre in Lucan Village area.</li> </ul> <p>3. Future Planning for Arts and Culture</p> <p>The Arts Council welcomes the approach taken to inform such policies through the use of the Social/Community Infrastructure Audit. That said, the Arts Council would encourage the local authority to build upon this approach to prepare a county register of arts and cultural assets which would include clarification of infrastructure such as arts centres, museums, heritage buildings, or townscapes, or public spaces and locations which either individually or collectively, contribute to access to, and/or provision of arts and culture in the future. This information could be used to generate a baseline database of arts and cultural assets and their spatial distribution/concentration across the county based on the type of activity, level of provision, and key</p>	<p>No change to Draft Plan.</p>
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	<p>attributes. This information can inform locational decision and future needs and can inform other services providers interested in co-location of service and activities.</p>	
<p>SD-C195-154 Tallaght Community Council</p>	<p>The submission requests COS11 Objective 3 to be amended as such: “open competition to celebrate local heritage themes and topics”.</p> <p>With regards to COS11 Objective 6 and 9 Heritage centre for Tallaght &amp; Lucan, the submission queries if this is a duplication as it is concerned over the risk of neither facility happening or being of a scale to be viable if both progress.</p>	<p><b>CE Response:</b></p> <p>This submission requests an amendment to COS11 Objective 3 to include “open competition to celebrate local heritage themes and topics”.</p> <p><b>COS11 Objective 3:</b></p> <p>To require new commercial developments greater than 5,000 sqm in size, in the case of non-residential development, and in excess of 500 units in the case of residential development, to incorporate a physical artistic feature into the scheme to improve the built environment / public realm, which could include high quality features within the environment / landscaping, in agreement with the Council, and to invite local artists to participate where appropriate by way of open competition.</p> <p><b>Proposed amended COS11 Objective 3:</b></p> <p>To require new commercial developments greater than 5,000 sqm in size, in the case of non-residential development, and in excess of 500 units in the case of residential development, to incorporate a physical artistic feature into the scheme to improve the built environment / public realm, which could include high quality features within the environment / landscaping, in agreement with the Council, and to invite local artists to participate where appropriate by way of open competition <b>to celebrate local heritage themes and topics.</b></p> <p>The objective as worded provides for the scope to celebrate local heritage themes and topics but does not limit the objective in the way suggested. It is considered that the wording of the objective in the Draft Plan is more appropriate.</p>

		<p>The submission notes the similarities between COS11 Objective 6 and COS11 Objective 9, as below, and queries if they are a duplication.</p> <p><b>COS11 Objective 6:</b></p> <p>To pursue the development of a Heritage Centre in Tallaght Village within the lifetime of the County Development Plan.</p> <p><b>COS11 Objective 9:</b></p> <p>To pursue the development of a Heritage Centre in Lucan Village area.</p> <p>Both Objectives reference the development of a Heritage centre but in two different village areas. Objectives as stated are correct, they refer to tow different locations and therefore are not duplicates.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan</p>
<p><a href="#">SD-C195-263 Smashing Times International Centre for the Arts and Equality</a></p>	<p>A submission welcomes objective COS11 Objective 7 on supporting arts and culture by facilitating community groups to use vacant or unused council premises, where suitable.</p>	<p><b>CE Response:</b></p> <p>It is noted that a submission by the Smashing Times International Centre for the Arts and Equality welcomes COS11 Objective 7.</p> <p><b>COS11 Objective 7:</b></p> <p>To support the arts and culture by facilitating community groups to use vacant or unused council premises for exhibitions, performances and other uses related to community arts, where suitable.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>

<p>SD-C195-263 Smashing Times International Centre for the Arts and Equality</p>	<p>A submission considers there is a gap in the provision of an arts centre for people who live in Tallaght, Firhouse/Bohernabreena, Rathfarnham- Templeogue-Walkinstown. Research published in 2020 by South Dublin County Public Participation Network in terms of deprived area are such areas Smashing Times would like to work in.</p> <p>A submission is received from Smashing Times International Centre for the Arts and Equality who are working to secure a physical home in the South Dublin County area, for the creation of a museum, for the promotion, study, practice of the arts, human rights, climate justice, gender equality, diversity and peace. It will attract national and international visitors to come and learn about and celebrate artistic practice. The centre will produce an interdisciplinary arts programme with focus on cultural engagement, economic development, tourism, education and new digital technologies. The digital museum will bring to life Irelands history, heritage and culture related to arts and equality.</p> <p>The submission also mentions that Dominic's, Knocklyon and Tymon Bawn Community Centres would welcome more arts / creative activities for all ages of the community.</p>	<p><b>CE Response:</b></p> <p>The Submission is noted</p> <p>The Draft Plan include COS11 Objective 8 as follows:</p> <p>To prepare a feasibility study for the development of Arts and Culture Infrastructure within the County, taking account of transport links.</p> <p>It is considered that this objective will facilitate a review of arts facilities in the County.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p>SD-C195-263 Smashing Times International Centre for the Arts and Equality</p>	<p>A Submission considers that there is a lack of outreach to deprived areas because of population size and levels of disadvantage and the majority of such services are located to the North and West of the overall Council area and therefore targeted areas should be to the south and east of the County.</p>	<p><b>CE Response:</b></p> <p>This submission is noted and acknowledged.</p> <p>COS9 Objective 7 promotes the provision of youth services that support, and target disadvantaged young people and improve their employability, consistent with RPO 9.20 of the RSES, and the provision of informal education and training opportunities within the County, consistent with the LECF.</p> <p>The Draft Plan also include COS11 Objective 8 as follows:</p>

		<p>To prepare a feasibility study for the development of Arts and Culture Infrastructure within the County, taking account of transport links.</p> <p>It is considered that sufficient policy is contained within the Draft Plan to support the provision of services in the appropriate areas.</p> <p>This issue is not a matter for the County Development Plan but will be dealt within the Local Economic Community Plan when it is updated in 2022.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
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# **Chapter 9:**

## **Economic Development and Employment**



## Chapter 9: Economic Development and Employment

Employment in South County Dublin		
Submission No.	Submission Summary	CE response and recommendation
<p>SD-C195-10 Social Enterprise Republic of Ireland</p> <p>SD-C195-27 Partas</p>	<p>Submissions raise the following issues:</p> <ul style="list-style-type: none"> <li>- A commitment to identify and disseminate best practice local examples of social enterprises and increase public understanding of their contribution to society and the economy, which in turn will provide ideas and inspiration for communities in meeting identified community services and product needs.</li> <li>- A commitment to work with Social Enterprises to access and develop appropriate fit for land and buildings as spaces to enable development and growth of new products/services, which in turn will create synergies, networking and the potential for collaboration.</li> <li>- A commitment to include Social Clauses in Public Procurement, to make the public procurement process more accessible. Local Authorities can facilitate this in how they structure their public procurement exercises when delivering on the County Development Plan investments.</li> <li>- A commitment to identify and disseminate best practice local examples of social enterprises and increase public understanding. SERI will continue to communicate the social enterprise agenda in a co-ordinated way, however, it is important that the Local Authority also underpin that messaging to ensure coherence and to improve public understanding of social enterprise as a whole, and its contribution to society and the economy.</li> </ul>	<p><b>CE Response:</b></p> <p>The submissions are noted and welcomed.</p> <p>The Economic Development and Employment chapter sets out a number of policies and objectives which aim to work with all employment creating enterprises such as the policies and objectives stated within EDE1 and EDE3 of the Draft Plan which deal with the creation of synergies, networking For example EDE1 Objective 1 states:</p> <p><i>To enable a strong, inclusive and resilient economy, supported by enterprise, innovation and skills through the creation of places that can foster enterprise and innovation and attract investment and talent, consistent with National Strategic Outcomes 4, 5 and 6 of the NPF.</i></p> <p>EDE1 Objective 7 ensures a co-ordinated approach between the Development Plan and the Local Economic and Community Plan. The issues of identification and dissemination of best practice are not ones for the Development Plan but may be something that the forthcoming review of the LECP could examine on foot of consultation for that plan.</p> <p>It is considered that all social enterprises, as a component of Economic Development and Employment, are appropriately supported under the policies and objectives of EDE1 and EDE3 within the Economic Development and Employment chapter of the plan.</p>

		<p>The matter of procurement is not a County Development Plan issue.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
SD-C195-192 Killeen Motor Group .	<p>This submission looks for an SLO to the east of the Toyota Garage Liffey Valley stating:</p> <p>EDE10 SLO1: To support the provision of an office development to the east of the Toyota Garage, Liffey Valley to increase the mix of uses in the area.</p> <p>This submission recommends the addition of a policy to support the provision of office development outside the Retail Core, with the following wording:</p> <p>EDE10 Objective 5: To support the provision of office development on sites outside the Liffey Valley Core Retail Area.</p>	<p><b>CE Response:</b></p> <p>The submission is noted.</p> <p>EDE10 Objective 1 supports Liffey Valley as a MRC and allows for the growth of the existing shopping centre and complementary leisure/entertainment, retail warehouse and commercial land uses on site.</p> <p>Office development currently exists in the area with Volkswagen Group Ireland, Abbott and Valero Energy Ireland Limited all based in office units in the surrounding area.</p> <p>Within the Draft Plan, the zoning objective MRC includes offices 100sq m to 1000sq m as open for consideration. Offices over 1000m<sup>2</sup> are not permitted within the zoning matrix.</p> <p>Having regard to the fact that offices are already permitted up to 1000sq m it is considered that there is no requirement for the proposed SLO.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan</p>
SD-C195-136 An Post	<p>The following issues were raised by An Post:</p> <ul style="list-style-type: none"> <li>- This submission requests that SDCC provide a supportive policy framework for the future provision of postal infrastructure to ensure the needs of a growing market and an expanding population. The</li> </ul>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted.</p> <p>An Post's role in the provision of an important service for the community and business is recognised. Individual planning applications are determined on their merits through the</p>

	<p>submitter is happy to engage with SDCC on this matter.</p> <ul style="list-style-type: none"> <li>- This submission acknowledges SDCC stance on the importance of existing business operating in the Naas Road area and request that SDCC carefully consider the existing operational requirements for business in the area, as well as the potential impacts that may arise as a result of non-employment land-uses being established within an existing industrial area.</li> <li>- This submission requests the South Dublin CDP to include appropriate policies and objectives in the to facilitate enhanced postal services in South Dublin, such as below:</li> </ul> <p>-“To support An Post in the provision of new postal facilities and the enhancement of existing facilities, including operational requirements, in South Dublin.”</p> <p>- “To facilitate the provision of postal infrastructure at suitable locations in South Dublin.”</p> <p>- “To promote the integration of appropriate postal facilities, including post offices, processing, sortation and distribution facilities, within new and existing communities that are appropriate to the size and scale of each settlement.</p>	<p>development management system and its implementation of policy in the Development Plan and national and regional policy.</p> <p>The Draft Plan contains significant policy to support business and different types of enterprise. This includes Policy EDE1 which supports sustainable enterprise and employment growth in the County. EDE1 Objective 3 is to ensure that there is a sufficient supply of zoned and serviced lands at suitable locations to accommodate a range of enterprise and employment development types. In relation to regeneration lands and the Naas Road lands in particular, CS2 Objective 2 is of particular relevance:</p> <p><i>To facilitate a co-ordinated approach and vision to any future sustainable development of the Naas Road Framework area in consultation with Dublin City Council, and all relevant stakeholders including the local community, and ensure that the needs of the existing and new community will be met, and the provision of necessary community and physical infrastructure is delivered in tandem with any new development.</i></p> <p>It is noted that on foot of a submission an amendment has been recommended to this latter objective to include specific reference to business. It is also noted that a public consultation has already taken place on the CityEdge Project on the Naas Road lands.</p> <p>There will be further opportunity for consultation as part of a statutory plan to be prepared for the Naas Road/CityEdge lands.</p> <p>In relation to the wider area, EDE1 Objective 5 states: <i>To support the implementation of the Metropolitan Area Strategic Plan to support the objectives for the South – West Corridor and the area within the M50 by the:</i></p> <ul style="list-style-type: none"> <li>• <i>Promotion of high tech, manufacturing and research and development in Grange Castle Business Park and Citywest.</i></li> <li>• <i>Intensification of industrial lands and mixed-use development at Naas Road/Ballymount and in Tallaght</i></li> </ul>
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<p><a href="#">SD-C195-136 An Post</a></p>	<p>An Post have indicated that as a result of recent trends in the postal services market, the Company, over the coming years, will seek to enhance facilities at existing and new locations. Concerns are expressed that postal facilities of a certain scale may fall within the context of a space intensive (sic) land use.</p> <p>Further clarification on what comprises a space extensive land use, as included in Section 9.3 of the Draft CDP is requested.</p>	<p><b>CE Response:</b></p> <p>The issues raised in this submission are noted.</p> <p>In planning for strategic employment growth both the National Planning Framework and the Regional Spatial and Economic Strategy indicate that key considerations are the locations for new enterprises, based on the extent to which they are people intensive (i.e. employees/customers), space extensive (i.e. land), tied to resources, dependent on the availability of different types of infrastructure (e.g. telecoms, power, water, roads, airport, port etc.) or dependent on skills availability.</p> <p>Where new development is proposed, it will be assessed against the relevant land use zoning taking account as to whether its location has sufficient regard to the need to promote compact growth within the County. Consideration will also be given to the needs of the business in terms of location and its importance to the national economy.</p> <p>Where development already exists, proposals for redevelopment or extensions will be assessed on their merits against the relevant land use zoning and other objectives.</p>

		<p>Typically, in South Dublin land extensive uses are warehousing and data centres which are best suited to lands outside the urban core for the reasons set out in the Draft Plan, the NPF and the RSES.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan</p>
<p>SD-C195-254 Deputy Emer Higgins</p>	<p>The submission highlights the recent need for home-working due to Covid-19 and suggests that the Plan provide for hot-desking business centres and remote working hubs in parallel to harnessing working from home to help alleviate congestion on our routes to the city centre.</p> <p>The submission cites the ACE enterprise park in Clondalkin and wishes to see it replicated in areas like Lucan and Adamstown.</p>	<p><b>CE Response:</b></p> <p>The issues raised are noted.</p> <p>Economic policy in the Draft Development Plan reflects the overarching themes of climate change and placemaking and integrates National and Regional direction into policy at a county level. This is supported in the four employment themes of Green and Innovative Economy, Urban Growth, Regeneration and Placemaking, Building on Clusters and A Learning Economy.</p> <p>Each of the above was commended by the OPR, setting ambitious policies which will attract FDI to South Dublin.</p> <p>The National Remote Working Strategy was published in January 2021 and sets out the Government's vision to ensure remote working as a permanent feature in the Irish workplace in a way that maximises economic, social and environmental benefits. To achieve this the Strategy sets out three Pillars: Pillar One is focused on creating a conducive environment for the adoption of remote work; Pillar Two highlights the importance of the development and leveraging of remote work infrastructure to facilitate increased remote work adoption; and, Pillar Three is centred on maximising the benefits of remote work to achieve public policy goals.</p> <p>The policies to provide for remote working and working hubs have been covered in the Draft Plan under EDE4 Objective 12, providing hubs at neighbourhood level throughout the county.</p>

		<p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
SD-C195-95 BMA Planning	<p>Submission relates to 7.7 ha. located north of Kingswood Village, east of Casement Aerodrome, south of Corkagh Park and directly north of the Kingswood Interchange (Junction 2 ) on the M7.</p> <p>The purpose of this submission is to reinstate specific local objective at Wilsons Auctions Site, to comprise SLO EDE4 SLO2 as follows:</p> <p><i>“EDE4 SLO 2: To facilitate the continuance of warehousing and ancillary auction uses at the Wilson’s Auctions Premises (c.7.7ha), Corkagh off the Green Isle Road subject to proper planning and sustainable development including protection of the operating capacity and safety of the N7 and its interchange with the Green Isle Road and Grange Castle Road, safeguarding the setting of Corkagh Park and its protected structures, and consideration of any potential impacts on the operation and safety of Casement Aerodrome”.</i></p>	<p><b>CE Response:</b></p> <p>The submission is noted. The 2016 Development Plan included ET3 SLO1 which was to facilitate warehousing and ancillary auction uses at the former Interbloem premises subject to a number of criteria around the operation of the N7 and Casement Aerodrome and the, safeguarding of Corkagh Park and protected structures.</p> <p>The SLO has not been carried forward to the Draft Plan. The site is located on zoning OS – Open Space. The existing use can be considered as a non-conforming use under the zoning. Subject to meeting basic criteria, non-conforming uses can be considered for intensification under section 13.1.1 (vi) of the Plan where the intensification would not be detrimental to the amenities of the surrounding area and where they accord with the principles of proper planning and sustainable development.</p> <p>This policy is considered to be sufficient to provide for the continuance of the existing use.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
SD-C195-154 Tallaght Community Council	<p>The submission states that Tallaght needs new SLOs to deliver its position and potential for employment. As such it requests to add the following wording to page 333: "To work with local and national partners &amp; stakeholders e.g. Partas, IDA, LEO to plan and market the intense employers to locate in Cookstown and the REGEN lands to ensure employment growth in the lifetime of this plan."</p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted.</p> <p>The Draft Plan promotes the innovative economy and the building of clusters throughout the county. EDE3 Objective 2, 6 and 7 will aim to support a resilient economy, by engaging with stakeholders, for the creation of a wider economic base, where appropriately</p>

		<p>zoned lands will lead to the creation of more enterprise centres and mixed use development on REGEN land.</p> <p>The policies requested have been adequately covered in the Draft Plan.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
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<b>South Dublin County Employment Themes</b>		
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Submission No.	Submission Summary	CE response and recommendation
SD-C195-11 Proinsias Mac Fhlannchadha	SDCC to work with the OPW to explore the feasibility of converting Rathfarnham Castle into a Digital hub to support remote working as per EDE4 Objective 12.	<p><b>CE Response:</b></p> <p>The issue raised in the submission is noted.</p> <p>The National Remote Working Strategy was published in January 2021 and sets out the Government’s vision to ensure remote working as a permanent feature in the Irish workplace in a way that maximises economic, social and environmental benefits. To achieve this the Strategy sets out three Pillars: Pillar One is focussed on creating a conducive environment for the adoption of remote work; Pillar Two highlights the importance of the development and leveraging of remote work infrastructure to facilitate increased remote work adoption; and, Pillar Three is centred on maximising the benefits of remote work to achieve public policy goals.</p> <p>At present the Castle is owned by the OPW and dates back to the Elizabethan period, now acting as a Museum. Its existing use providing a tourism amenity within the County, is considered appropriate.</p> <p>The Draft Plan supports remote working and hubs through EDE3 Objectives 6 and 7 and EDE4 Objective 6, EDE4 Objective 12.</p>

		<p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p>SD-C195-154 Tallaght Community Council</p>	<p>The submission requests that EDE4 Objective 2 be amended to apply to REGEN areas specifically.</p> <p>The submission also suggests that the Tallaght REGEN areas need the support of a suggested Cluster to guide future growth in enterprise and employment.</p> <p>In addition, the submission request that the Airton &amp; Broomhill REGEN areas adjoin TUD Tallaght – The land use, zoning / cluster identity could be improved to direct future REGEN in this area.</p>	<p><b>CE Response:</b></p> <p>The submission is noted.</p> <p>EDE4 Objective 4 looks to promote quality placemaking and design as an integral element of attracting investment and to attracting a diverse and creative population to live and work within the County. This applies to all zoning recognising the role that high quality design and placemaking plays in creating investment and attracting people to the county. It would not be appropriate to limit this to one zoning type or to a specific area of the County.</p> <p>The Draft Plan contains significant policy to provide for the support of clustering. In particular Policy EDE5 supports clustering by creating, maintaining, or upgrading economic strongholds in a favourable business ecosystem.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan</p>
<p>SD-C195-60 Quanta Capital</p>	<p>The submission endorses Policy EDE4 and Policy QDP16 and associated policy objectives, e.g., EDE4 Objective 10 and QDP16 Objective 2 of the draft Plan. The submission highlights that the two overarching policies and associated objectives exhibit the Council's aim for working closely with other stakeholders to support and facilitate the redevelopment of underutilised brownfield sites and zoned regeneration areas such as the Naas Road/Ballymount within South Dublin County Council's administrative area while recognising the significant potential to accommodate residential and employment growth on these lands.</p> <p>The submission stipulates that the landowner is engaging in the current joint study being undertaking into the Naas</p>	<p><b>CE Response:</b></p> <p>The support for Policy EDE4 and Policy QDP16 and associated objectives is welcomed.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>



	<p>Road/Ballymount lands Naas Road - Ballymount - Cherry Orchard – Park West URDF Masterplan and fully supports the objectives of this inter authority study and is committed to continue working with SDCC and DCC to progress plans for regeneration and development of lands in the Naas Road/Ballymount area, and to give full realisation to Policy EDE4, Policy QDP16, EDE4 Objective 10 and QDP16 Objective 2 set out in the draft Plan.</p>	
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<b>Space Extensive Land Use</b>		
<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation</b>
<p><a href="#">SD-C195-11 Proinsias Mac Fhlannchadha</a></p>	<p>The wording as per EDE7 Objective 2 should be amended to include a reference to electricity as follows: "Sufficient capacity within the relevant water, wastewater and electricity* network to accommodate the use proposed" (Where anticipated usage greater than 10 MWh) given the warnings issued by Eirgrid/ Commission for the Regulation of Utilities as to the current supply constraints on the national grid.</p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted.</p> <p>The council recognises the importance of monitoring Data Centres and their energy consumption in Ireland at present. EDE7 Objective 2 contains strong policy and criteria which must be addressed by space extensive enterprise such as data centres. This policy has been prepared in consultation with Codema, Dublin's energy agency which aims to accelerate Dublin's low-carbon transition. The policy looks for development to maximise on site renewable energy generation in the first instance. Where full on site demand cannot be met through on site renewable, the policy requires evidence of power purchase agreements. However, it is considered that the suggested amendment is appropriate to strengthen further the policy. It is also considered that the reference to power purchase agreements should be strengthened to reflect that they should be PPAs in Ireland, ensuring that agreements relate to the Irish grids renewable electricity.</p> <p><b>CE Recommendation:</b></p> <p>Amend EDE7 Objective 2, bullet points 3 and 4 as follows:</p>

		<p>To require that space extensive enterprises demonstrate the following:</p> <ul style="list-style-type: none"> <li>- The appropriateness of the site for the proposed use having regard to EDE7 Objective 1;</li> <li>- Strong energy efficiency measures to reduce their carbon footprint in support of national targets towards a net zero carbon economy, including renewable energy generation;</li> <li>- Maximise on site renewable energy generation to ensure as far as possible 100% powered by renewable energy, where on site demand cannot be met in this way, provide evidence of engagement with power purchase agreements <b>in Ireland</b> (PPA);</li> <li>- Sufficient capacity within the relevant water, wastewater <b>and electricity</b> networks to accommodate the use proposed;</li> <li>- Measures to support the just transition to a circular economy;</li> <li>- Measures to facilitate district heating or heat networks where excess heat is produced;</li> <li>- A high-quality design approach to buildings which reduces the massing and visual impact;</li> <li>- A comprehensive understanding of employment once operational;</li> <li>- A comprehensive understanding of levels of traffic to and from the site at construction and operation stage;</li> <li>- Provide evidence of sign up to the Climate Neutral Data Centre Pact.</li> </ul>
<p>SD-C195-11 Proinsias Mac Fhlannchadha</p>	<p>GI5 Objective 7 should form a key requirement under EDE7 Objective 2.</p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted.</p> <p>EDE Objective 2 sets out policy and criteria for the assessment of space extensive enterprise. However, EDE7 Objective 3, also relating to space extensive enterprise, looks to ensure that landscaping and site layout in space extensive developments provides for demonstrated biodiversity measures and that landscape and biodiversity measures integrate into the green</p>

		<p>infrastructure network, in accordance with the Green Infrastructure Strategy set out in Chapter 4 of this Plan.</p> <p>It is considered that GI5 Objective 7 as a component towards space extensive land use developments is appropriately supported under this EDE7 Objective 3.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
SD-C195-63 Kildare County Council	This submission looks for close collaboration on the siting of Data Centres (EDE7 Objective 1), considering the proximity to the Kildare border and the emergence of similar developments in Kildare.	<p><b>CE Response:</b></p> <p>The submission from Kildare County Council (KCC) is noted and welcomed on this matter.</p> <p>The Council will continue to work with KCC on any cross border issues including the development of Data Centres throughout the lifetime of the Draft Plan.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
SD-C195-279 Ballyboden Tidy Towns Group	The submission requests that policies restricting further data centre development need to be strengthened in the Draft Plan. It is submitted that data centres should only be permitted where they can provide 100% on-site renewable energy generation to power the facility. Where on site demand cannot be met permission should be refused.	<p><b>CE Response:</b></p> <p>The submission is noted.</p> <p>The Council has monitored recent discussions in the Dail and Seanad on Data Centres energy consumption. As stated within Section 9.3, Space Extensive Land Uses generally have a higher carbon footprint, whether because of transport related uses or the large amounts of energy demanded by them. The Development Plan has included strong policies on high energy users through EDE7 Objective 2, requiring them to maximise on site renewable energy generation with 100% renewable on site as far as possible. If demand cannot be met in this way there is a requirement to provide evidence of engagement with power purchase agreements (PPAs). These PPAs relate to renewable energy and emissions with the current grid emissions factor 0.295 kgCO<sub>2</sub>/kWh, which will</p>

		<p>continually decrease as more renewables are connected to get to the national 70% target.</p> <p>It is also noted that a recommendation has been made to amend EDE7 Objective 2 to include that sufficient capacity is demonstrated in the electricity network by a prospective developer.</p> <p>Having regard to the above, and to the Government's continued support for data centres, it is considered that the policy in the Draft Plan is robust and will require demonstration of capacity in the relevant networks and of the energy efficiency of the development.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
<p>SD-C195-119 People Before Profit</p>	<p>It is believed that there was a real opportunity to completely ban data centres in South Dublin which would have sent a strong message that South Dublin takes the climate crisis extremely seriously.</p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted.</p> <p>The Council has monitored recent discussions in the Dail and Seanad on Data Centres energy consumption. As stated within Section 9.3, Space Extensive Land Uses generally have a higher carbon footprint, whether because of transport related uses or the large amounts of energy demanded by them.</p> <p>The Development Plan has included strong policies on high energy users through EDE7 Objective 2, requiring them to maximise on-site renewable energy generation with 100% renewable on site as far as possible. If demand cannot be met in this way there is a requirement to provide evidence of engagement with power purchase agreements (PPAs). These PPAs relate to renewable energy and emissions with a current grid emissions factor of 0.295 kgCO<sub>2</sub>/kWh, which will continually decrease as more renewables are connected to get to the national 70% target for renewable electricity.</p> <p>Having regard to the above, and to the Government's continued support for data centres, it is considered that the policy in the Draft</p>

		<p>Plan is robust and will require demonstration of capacity in the relevant networks and of the energy efficiency of the development.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p><a href="#">SD-C195-213 An Taisce</a></p>	<p>The An Taisce submission notes that data centres now consume 11% of Ireland’s total grid-generated electricity. This is projected to increase to 31% by 2027 adding between 1.5 3 million tonnes of CO2 to Ireland’s overall greenhouse gas emissions by 2028. The Commission for the Regulation of Utilities (CRU) and EirGrid have both recently expressed serious concerns regarding data centre energy use and the implications for Ireland’s energy security. In discussing the increasingly precarious condition of the national grid, the CRU went so far as to warn of the possibility of rolling blackouts due to data centre energy demand in particularly grid-constrained areas, including in the Greater Dublin Area. Both the CRU and EirGrid have stated the need for a review of data centre grid connection policies across the country as a result of their skyrocketing energy demand.</p> <p>An Taisce strongly recommends that the new CDP put in place at least a temporary or partial moratorium on new data centre development in the County. Similar data centre moratoriums have been enacted globally, demonstrated by Amsterdam and Haarlemmermeer in the Netherlands, which recently lifted a year-long ban on data centre development. A partial moratorium on data centre development in South Dublin could follow the approach taken in the province of Flevoland in the Netherlands, where regional authorities plan to study the impact of large data centres on the local community and infrastructure during its moratorium, before agreeing to any more facilities being built in the region.</p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted.</p> <p>The Council has monitored recent discussions in the Dail and Seanad on Data Centres energy consumption. As stated within Section 9.3, Space Extensive Land Uses generally have a higher carbon footprint, whether because of transport related uses or the large amounts of energy demanded by them. The Development Plan has included strong policies on high energy users through EDE7 Objective 2, requiring them to maximise on site renewable energy generation with 100% renewable on site as far as possible. If demand cannot be met in this way there is a requirement to provide evidence of engagement with power purchase agreements (PPAs). These PPAs relate to renewable energy and emissions with the current grid emissions factor 0.295 kgCO2/kWh, which will continually decrease as more renewables are connected to get to the national 70% target.</p> <p>It is also noted that a recommendation has been made to amend EDE7 Objective 2 to include that sufficient capacity is demonstrated in the electricity network by a prospective developer. This will accord with the recent Policy Statement of Security of Electricity Supply issues by the government in November 2021 and which requires for the connection of large energy users to the electricity grid to take into account the potential impact on security of electricity supply and on the need to decarbonise the electricity grid.</p> <p>Having regard to the above, and to the Government’s continued support for data centres, it is considered that the policy in the Draft</p>

	<p>Notwithstanding the above An Taisce also recommend the inclusion of the following objectives in the Plan.</p> <ul style="list-style-type: none"> <li>-Any new data centre proposal must fully comply with the requirements of the EU Environmental Impact Assessment Directive and assess the cumulative impacts of the energy demand and associated emissions in conjunction with the data centre sector as a whole.</li> <li>-Any new data centre proposal will have its energy demand assessed against the rapidly increasing electricity grid constraints.</li> <li>-Any new data centre development will only be considered if it provides a new, directly linked supply of renewable energy or matches its energy consumption with a new commensurate or greater contribution to Ireland's renewable's supply in tandem with the proposal.</li> <li>-Gas or other fossil fuel fired on-site power plants will not be permitted, as they will exacerbate lock-in to fossil fuels be incompatible with achievement of Ireland's legally binding EU emissions and renewable energy targets and the realisation of its national climate targets per the Climate Action and Low Carbon Development (Amendment) Act 2021.</li> </ul>	<p>Plan is robust and will require demonstration of capacity in the relevant networks and of the energy efficiency of the development.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
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South Dublin County Retail Strategy		
Submission No.	Submission Summary	CE response and recommendation
<p>SD-C195-113 CAIRN Plc</p> <p>SD-C195-133 CAIRN Plc</p>	<p>The submission requests that Section 9.4.4 Additional Retail Floorspace and Sequential Growth of the Draft Plan be amended to exclude the reference to the possible provision of anchor stores in SDZ District Centres as follows: The SDZ District Centres will reflect a higher density urban environment</p>	<p><b>CE Response:</b></p> <p>The issue raised is noted.</p> <p>It is acknowledged that the wording in the text under section 9.4.4 is not consistent with Table 9.1 which describes the service</p>

	<p>and will cater for a varied range of comparison shopping on main shopping streets, some leisure activities and a range of cafes and restaurants and other mixed uses. They provide for at least one supermarket and ancillary food stores alongside financial and other retail services.</p>	<p>type relevant for the Level 3 District Centres in the County which includes Adamstown and Clonburris. It is also noted that the planning schemes do not mention anchor department stores.</p> <p>It is considered appropriate to amend the wording to delete reference to 'including the possibility of anchor department stores on main shopping streets' so that the text will read:</p> <p>The SDZ District Centres will reflect a higher density urban environment and will cater for a varied range of comparison shopping, some leisure activities and a range of cafes and restaurants and other mixed uses. They provide for at least one supermarket and ancillary food stores alongside financial and other retail services</p> <p><b>CE Recommendation:</b></p> <p>Amend the third paragraph of section 9.4.4, second sentence to read:</p> <p>The SDZ District Centres will reflect a higher density urban environment and will cater for a varied range of comparison shopping, some leisure activities and a range of cafes and restaurants and other mixed uses. They provide for at least one supermarket and ancillary food stores alongside financial and other retail services.</p>
<p><a href="#">SD-C195-92 Lidl Ireland GmbH</a></p>	<p>This submission proposes the following changes to the Clondalkin Core Retail Area Policies and Objectives:</p> <ul style="list-style-type: none"> <li>- The mapped Core Retail Area should be adjusted to be primarily centered on the Ninth Lock/Tower Road, Main Street and Orchard Road axis route, with an appropriate buffer around same to define the core area (c.150-200 metres);</li> <li>- EDE11 Objective 2 should be amended to state: To facilitate the provision of a substantial scale, and broad range of retailing, services and functions across Clondalkin Town Centre, with an</li> </ul>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted.</p> <p>The adjusted core retail area map submitted with this submission endorses out of town centre shopping, which goes against national, regional and local planning policy and is therefore inappropriate.</p>

	<p>emphasis on higher order uses towards the centre of the Core Retail Areas';</p> <p>- EDE11 Objective 3 should be amended to state: To promote and encourage the enhancement/redevelopment/development of existing cluster of activity and the identical retail/mixed use opportunity and other sites in Clondalkin Town Centre, whilst maximising connectivity between sites and the Core Retail Area, to serve the established and growing catchment population.</p>	<p>EDE11 Objective 2 aims to provide high level retailing to the Core retail areas of Clondalkin, along with a broad range of service and functions in the wider town centre zoning.</p> <p>Each planning application will be dealt with on its merits. A broad range of retailing services and functions is provided for in the objective in both the core retail area and the wider town centre zoning. There is no requirement to amend this objective.</p> <p>EDE11 Objective 3 states:</p> <p><i>To promote and encourage the development/redevelopment of the identified retail/mixed use opportunity and other sites in the Core Retail Area of Clondalkin, including the Mill Centre lands, ensuring connectivity between sites and the town centre, to serve the established and growing catchment population.</i></p> <p>This objective relates directly to the identified retail opportunity sites and other sites within the core retail area. It is not considered appropriate to expand the extent of the area outside the retail core which has significant lands to accommodate retail growth in a compact form. However, it is considered appropriate to add the word 'enhancement' to the objective.</p> <p><b>CE Recommendation:</b></p> <p>Amend EDE11 Objective 3 to include the word 'enhancement':</p> <p>To promote and encourage the <b>enhancement and</b> development/redevelopment of the identified retail/mixed use opportunity and other sites in the Core Retail Area of Clondalkin, including the Mill Centre lands, ensuring connectivity between sites and the town centre, to serve the established and growing catchment population.</p>
<p><a href="#">SD-C195-124 ERF Lucan Investment DAC</a></p>	<p>This submission states section 9.4.1 of the Draft CDP highlights GDA Retail Strategy dates back to 2008, with the estimates of retail capacity and turnover of existing centres are significantly outdated. Thus, it is recommended that SDCC commission its</p>	<p><b>CE Response:</b></p> <p>The submission is noted.</p>



<p>SD-C195-133 CAIRN Plc</p> <p>SD-C195-154 Tallaght Community Council</p>	<p>own assessment of retail capacity and turnover of existing centres.</p> <p>The submission notes that the retail hierarchy and data relating to the retail offer and provision in the county is based on the 2008 Greater Dublin Area Retail Strategy. It is recommended that the retail context and offer is reviewed to reflect the updated retail environment which has changed significantly since the 2008 Retail Strategy was devised.</p> <p>It also requests a review of Retail Warehousing in Tallaght to meet changes in demand and consumer retail behaviours.</p>	<p>The Draft Plan has recognised the challenges facing traditional retailing and has included policy to continue to support retail development at the different levels of the retail hierarchy.</p> <p>Section 9.4.1 Strategic Guidance recognizes that the last Regional Retail Strategy was carried out for the Greater Dublin Region in 2008. RPO 6.10 of the RSES supports the preparation of an updated Retail Strategy/Strategies for the Region in accordance with the Retail Planning Guidelines for Planning Authorities (2012).</p> <p>Any such Strategy will include a review of the retail hierarchy and retail floorspace requirements for the Region. In the absence of any update, the RSES sets out the retail hierarchy for the region. As set out in the Draft Plan, should any future regional strategy or update of the guidelines provide a different planning context to that presented in this section consideration will be given to the need for a Variation to the County Development Plan.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p>SD-C195-124 ERF Lucan Investment DAC</p>	<p>This submission generally supports Policy EDE12 Objective 2, yet it currently lacks suitable qualification on the level of impact that would warrant refusal of planning permissions. The current objective states that any impact or diversion of trade from a higher order centre will be resisted. This objectives should be amended as follows:</p> <p>'To ensure that the scale and type of retail offer in District Centres is sufficient to serve a district catchment, without generating a significant adversely impacting on or drawing significant trade from higher order retail centres.'</p>	<p><b>CE Response:</b></p> <p>The issues raised in the submission are noted.</p> <p>EDE12 Objective 2 reads:</p> <p><i>To ensure that the scale and type of retail offer in District Centres is sufficient to serve a district catchment, without adversely impacting on or drawing trade from higher order retail centres.</i></p> <p>It is considered that the current wording of the objective is appropriate and would not be changed in any material way by the proposed wording. It is also noted that the section 28 guidelines require retail impact assessments should there be concern at the</p>

		<p>level of impact. These can be requested through the development management process.</p> <p><b>CE Recommendation:</b></p> <p>No Change to the Draft Plan.</p>
<p>SD-C195-156 Avison Young (on behalf of Tesco Ireland Limited)</p>	<p>This submission highlights that Tesco operate a store at Hillcrest Heights in Lucan, zoned LC in the Draft CDP. As set out within the CDP, 'Shop-Major Sales Outlet' is not permitted under the LC zoning objective, thus the Tesco store could be deemed a non-conforming use.</p> <p>It is requested that SDCC maintains the LC zoning objective as proposed, while acknowledging the retail convenience floor space of the existing store (this can be included as a footnote, detailing specific land use at the existing Hillcrest Shopping Centre).</p>	<p><b>CE Response:</b></p> <p>This issue raised in this submission is noted.</p> <p>The site is located on zoning LC – Local Centre. The existing use can be considered as a non-conforming use under the zoning. Subject to meeting basic criteria, non-conforming uses can be considered for intensification under section 13.1.1 (vi) of the Plan where the intensification would not be detrimental to the amenities of the surrounding area and where they accord with the principles of proper planning and sustainable development.</p> <p>The shopping centre is well established and an important retail outlet for citizens living in this area of the county. This policy within the Draft Plan is considered to be sufficient to provide for the continuance of the existing use.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p>SD-C195-156 Avison Young (on behalf of Tesco Ireland Limited)</p>	<p>This submission supports the additional retail development as proposed within the Draft CDP and requests that SDCC adopts a flexible approach to allow for development necessary to provide important local services and amenities for the growing population across settlement.</p> <p>This submission looks for the Council to provide flexible land use zoning objectives that will allow sites to be brought forward in the County's towns and settlements for convenience retail development over the lifetime of the Plan</p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted.</p> <p>South Dublin County will continue to support retail development at the different levels of the retail hierarchy, recognising the role of retail in creating a vibrant mix of uses in support of our communities while cognisant of the on-going changing retail trends.</p> <p>EDE8 Objective 4 looks to support the viability and vitality of the existing retail centres in the County, in particular in town, village</p>

		<p>and district centres and to facilitate a competitive and healthy environment for the retail industry, while reinforcing sustainable development.</p> <p>Retail provision of an appropriate scale for the zoning type is provided for as permitted in principle or open for consideration in all of the mixed-use zonings including Village Centre, Local Centre, District Centre, Town Centre, Major Retail Centre, new areas of residential (RES-N) and regeneration lands.</p> <p>The Council believes that the Draft Plan provides sufficiently flexible policy and objectives in relation to retail development in the County, to provide local and county level retail provision for the existing and future population of the County, with all planning applications dealt with on their merits.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p>SD-C195-156 Avison Young (on behalf of Tesco Ireland Limited)</p>	<p>This submission looks at the requirements of retailers highlight a number of different factors (Quality of public realm, retail layout achievable for example), looking for SDCC to ensure that modern stores are designed to efficient, spacious and provide a pleasant environment for both colleagues and consumers alike.</p> <p>SDCC are requested that new policies in the new Development Plan for the County fully recognise the design of modern retail formats and is dictated by retailers requirements, current building regulations, Fire Safety and Disability access requirements.</p> <p>(Back of house requirements are highlighted in Table 1 of the submission)</p>	<p><b>CE Response:</b></p> <p>The submission is noted.</p> <p>The Draft Plan sets out detailed policy and objectives for retail in both the Economic Development and Employment sections and in the Implementation chapter. Every planning application will be considered under its own merits, having regard to the policy contained in the Plan.</p> <p>It is considered that current retail policy, as a component towards retail development is appropriately supported within the Draft Plan and more detailed matters are more appropriately dealt with through the development management process.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>

<p>SD-C195-156 Avison Young (on behalf of Tesco Ireland Limited)</p>	<p>This submission looks for support to accommodate the growth of 'Click and Collect' retail services and Grocery Home Shopping due to the nature of retailing in general changing with movement towards online shopping. The following policy would be a welcome addition to the CDP:</p> <p><b>'To support and accommodate the growth of 'Click and Collect' retail services and grocery home shopping'.</b></p>	<p><b>CE Response:</b></p> <p>The issues raised in the submission are noted.</p> <p>The Draft Plan recognises that the retail sector as a whole has undergone significant change, understanding the challenges facing traditional retail, including the potential impacts of Brexit and of the Covid pandemic.</p> <p>It is recognised that in recent years due to changes in both demographics and consumer behaviour, there has been a rise in internet shopping, 'click and collect' and the emergence of 'omni channel consumers', who make use of a combination of traditional brick and mortar retailing combined with online platforms to make their purchases. A new focus in physical retailing is on what is referred to as 'experiential' retail, with a resultant shift from a town centre dominated by comparison retail offer to one where more time is spent on 'experiences' such as leisure, culture, food, beverages and retail services.</p> <p>In relation to click and collect, it is considered that there is sufficient policy in the plan to accommodate changing needs supported by retail Policy Objectives in particular EDE8 Objective 2 - <i>To ensure that the Retail Strategy for South Dublin County is reviewed and updated, where required, in a timely manner following the completion of any updated Regional Retail Strategy, consistent with RPO 6.10 and 6.11..</i></p> <p>And EDE8 Objective 9 - <i>To assess and monitor the vitality and viability of town, major retail, district and village centres, having regard to retail trends that influence the performance of the sector.</i></p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
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<p>SD-C195-154 Tallaght Community Council</p>	<p>The submission queries the omission of Tallaght Village under Level 4 Retail Centre.</p> <p>It also requests the following amendments:</p> <p>EDE9 Objective 4 – intensify retail uses in the retail core ( needs to be specified)</p> <p>EDE9 Objective 5 – Woodies Site on Belgard RD</p> <p>Employment / Retail / Leisure Needs are great in the Tallaght cluster – more so than residential.</p>	<p><b>CE Response:</b></p> <p>The issues raised in this submission are noted.</p> <p>Tallaght Village is indicated as a Level 4 centre in the retail hierarchy as set out in Table 9.2 of the Draft Plan.</p> <p>The core retail area of Tallaght specified in EDE9 Objective 4 is highlighted on Figure 9.1, of the Draft Plan. Figure 9.1 also identifies opportunity sites, one of which is the old Woodies site on Belgard Road.</p> <p>It is considered that there is sufficient land including existing vacant buildings within appropriately zoned land within Tallaght to accommodate further retail and employment uses.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p>SD-C195-154 Tallaght Community Council</p>	<p>The submission request an SLO – To upgrade and enhance the N81 frontage of Whitestown Business Park to a campus style akin to Citywest to retain the corporates and indeed clearly market Tallaght as an area to locate business in.</p>	<p><b>CE Response:</b></p> <p>This submission is noted.</p> <p>Whitestown Business Park is an important local factor to economic development within South Dublin County. As part of the Medium to Long term Road Objectives for the county the Blessington Road/N81 upgrades include local improvements. The employment use type within Whitestown Business Park is generally mixed use general type employment and is not complementary to a campus style layout which is more normally associated with office or R&amp;D type development. It is considered to change the business park to a campus style would involve a substantial loss of land to employment uses.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>

Core Retail Areas		
Submission No.	Submission Summary	CE response and recommendation
<p>SD-C195-113 CAIRN Plc</p> <p>SD-C195-133 CAIRN Plc</p>	<p>Having regard to the confirmed role and function of District Centres identified in the RPGs and also Table 9.2 of the Draft SDCC Plan, the submission seeks the amendment of EDE12 Objective 3 as follows: EDE12 Objective 3 To support and facilitate the development of new District Centres of an appropriate urban scale at Adamstown and Clonburris in accordance with approved Planning Schemes which should provide a sustainable retail mix including a good range of comparison shopping (though no large department store), some leisure activities and a range of cafes, restaurants and other mixed uses and shopping centres that contain at least one supermarket and ancillary foodstores alongside financial and other retail services all to facilitate walking, cycling and use of public transport and reduces car journeys outside the SDZ for many retail needs. In this regard, it is submitted that larger scale convenience supermarkets often include some lower order comparison goods which can cater for the day to day needs of residents and that the middle to higher order comparison goods can be catered for in the Major Town Centre of Liffey Valley, located a short distance (less than 3km) to the north of the Clonburris SDZ.</p>	<p><b>CE Response:</b></p> <p>The issue raised is noted.</p> <p>All development within either the Adamstown or Clonburris is required to align with the provisions of the SDZ planning schemes. Under section 169(9) of the Planning Acts, a planning scheme shall be deemed to form part of any development plan in force in the area of the scheme until the scheme is revoked, and any contrary provisions of the development plan shall be superseded.</p> <p>EDE12 Objective 3 in the Draft Plan states:</p> <p>To support and facilitate the development of new District Centres of an appropriate urban scale at Adamstown and Clonburris in accordance with approved Planning Schemes which should provide a sustainable retail mix including department stores and shopping centres that facilitates walking, cycling and use of public transport and reduces car journeys outside the SDZ for many retail needs.</p> <p>It is considered that change is required to EDE12 Objective 3, so that it supports the adopted planning schemes without the listing specific retail uses. The types of retail use appropriate for Level 3 district centres is set out within Table 9.1 and it is not necessary to repeat it in the objective.</p> <p><b>CE Recommendation:</b></p> <p>Amend EDE12 Objective 3 as follows:</p> <p><b>From:</b></p> <p>To support and facilitate the development of new District Centres of an appropriate urban scale at Adamstown and Clonburris in accordance with approved Planning Schemes which should</p>

		<p>provide a sustainable retail mix including department stores and shopping centres that facilitates walking, cycling and use of public transport and reduces car journeys outside the SDZ for many retail needs.</p> <p><b>To:</b></p> <p>To support and facilitate the development of new District Centres of an appropriate urban scale at Adamstown and Clonburris in accordance with approved Planning Schemes having regard to the need to provide a sustainable retail mix that facilitates walking, cycling and the use of public transport and reduces car journeys outside the SDZ for many retail needs.</p>
<p><a href="#">SD-C195-54 Transport Infrastructure Ireland</a></p>	<p>The submission acknowledges the support for the Retail Planning Guidelines in relation to the location of retailing in the South County Dublin outlined in Objective EDE8 Objective 1 and the requirement to apply the sequential approach to retail development outlined in EDE8 Objective 7.</p> <p>The submission notes the 'Core Retail Centres' identified in section 9.5 of the draft plan: Tallaght Core Retail Area, Liffey Valley Core Retail Area and Clondalkin Town Centre Core Retail Area and associated policy objectives.</p> <p>In addition, TII would welcome a new policy objective to support and develop a Local Area Plan for Liffey Valley and a commitment to undertake a LTP in conjunction with or in advance of Local Area Planning and recommends that the LTP should be prepared in accordance with the TII/NTA Area Based Transport Assessment (ABTA) Guidelines.</p> <p>TII would also welcome a new policy objective to reference the explicit presumption against large out of town retail centres located adjacent or close to existing, new or planned</p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted..</p> <p>The Draft Plan states that Local Area Plans will be prepared for areas where new development requires a co-ordinated approach and in particular for areas that are likely to experience large scale development or that are in need of regeneration.</p> <p>The Local Area Plans Guidelines for Planning Authorities (2013) advise that the decision to make a Local Area Plan should take cognisance of the degree to which major development is anticipated such as to justify the preparation of a stand alone plan, the resource implications and the need to focus resources in using the local area plan process for areas where major alterations to the built environment are anticipated.</p> <p>As major housing development is not anticipated within the core retail area of Liffey Valley during the lifetime of the Draft Plan and the build out of the area is almost complete or is subject to permission, it is considered that an objective to prepare a Local Area Plan is not justified at this time.</p> <p>The Draft Plan states a transport interchange is being progressed at the Liffey Valley Shopping Centre campus, where the</p>

	<p>national roads/motorways reflecting policy outlined in the Retail Planning Guidelines, 2012.</p>	<p>interchange will serve an essential function in the wider bus network and the NTA's BusConnects project. The planning application for the transport interchange and for the proposed extension to Liffey Valley Centre had regard to a detailed local access study for the Liffey Valley Retail Centre prepared under one of the actions in the current 2016 Development Plan. In addition, noting the inclusion of SM4 Objectives 4, 5 and 6 in the Draft Plan and SM1 Objective 8, it is considered that an objective for a Local Transport Plan (LTP) is not required at this time. Reference to the Area Based Transport Assessment Guidelines have been dealt with in the CE Responses under chapter 7.</p> <p>The Draft Development Plan Guidelines (2021`) also sets out provisions in respect to Local Area Plan Preparation under Section 5.6. It states the following:</p> <p>“The development plan should provide a rationale for the approach to LAP selection and provide a consistent basis for undertaking such a statutory exercise. The commitment to produce a large number of LAPs, primarily on the basis that there is an existing or historical LAP in place, should be avoided. The planning authority should instead examine if appropriate objectives and policies can be included in the development plan sufficient to provide a planning framework for the development of more modestly sized settlements.”</p> <p>The request to include a new objective with the explicit presumption against large out of town retail centres located adjacent or close to existing, new or planned national roads/motorways is not considered necessary given the inclusion in the Draft Plan of Policy EDE8 to have regard to the sequential approach, and protect the vitality and viability of existing centres in accordance with the retail framework provided by the Retail Planning Guidelines.</p> <p><b>CE Recommendation</b></p>
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		No change to the Draft Plan
SD-C195-154 Tallaght Community Council	The submission indicates that employment growth forecast of 1.528 new jobs per year and requests to understand how it will be monitored for distribution of where people live and job to residents ratio be made public to understand commuter patterns.	<p><b>CE Response:</b></p> <p>Policy CS5: Lands for employment, Objective 4 looks ‘to monitor and further develop the database of employment lands within the County.’</p> <p>Section 13.11.5 Monitoring framework sets out the monitoring framework for the Draft Plan and is structured in line with the Chapter sequence of the Plan.</p> <p>The recent release of the Draft Development Plan Guidelines for Local Authorities looks for:</p> <ul style="list-style-type: none"> <li>(i) A two year progress report by the Chief Executive on the development plan in accordance with Section 15(2) of the Act;</li> <li>(ii) A baseline report, used as an evidence base for commencing the review procedure for the development plan no later than 4 years after it adoption; and</li> <li>(iii) An annual development plan monitoring report containing key information from the indicators table on page 114 of the document.</li> </ul> <p>A number of indicators for commercial use have been set out on page 114 of the document and will be followed by SDCC. These are:</p> <ul style="list-style-type: none"> <li>1. Developed and occupied commercial floorspace; and</li> <li>2. Planning permissions for business/employment uses (m<sup>2</sup> of development) for: Office, Industrial, Retail and Warehousing/Logistics.</li> </ul> <p>The Chief Executive considers that the issue raised is adequately covered in the Draft Plan.</p> <p><b>CE Recommendation:</b></p>

		No change to the Draft Plan.
<a href="#">SD-C195-54 Transport Infrastructure Ireland</a>	<p>The submission welcomes the approach outlined in the Draft Plan which encourages compact growth and consolidates existing strategic employment locations that can be best served by public transport and active travel initiatives and welcomes Policy Objective EDE1 Objective 5. In addition, in the interests of safeguarding the capacity and strategic function of the national road network in the area in accordance with Government policy, it will be critical that the existing and proposed lands are well served by public transport and active travel modes. Appropriate Transport Assessment, including the cumulative impact of development, will need to be undertaken to ensure planned development can be accommodated complementary to safeguarding the strategic function of the national road network and associated junctions.</p> <p>The submission would welcome the above provisions to be considered and included in Objective EDE1 Objective 5 in the interests of clarity.</p>	<p><b>Response:</b></p> <p>The contents of the submission are noted.</p> <p>The layout of the Draft Plan provides that transport related objectives are, for the most part, contained within Chapter 7, Sustainable Movement.</p> <p>In this regard, Policy SM1 and the related Objectives and Policy SM2 and its objectives appropriately deal with the national road network and its strategic function. Similarly, active travel and public transport are dealt with extensively in the Sustainable Movement chapter and cover the issues raised here.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>

Rural Economy		
Submission No.	Submission Summary	CE response and recommendation
<a href="#">SD-C195-213 An Taisce</a>	<p>An Taisce notes that EDE18 Objective 1 should better differentiate between the planting of native woodland and the planting of other species such as sitka spruce, which create what are essentially ecological dead zones. Suggests that much greater emphasis should be placed on facilitating the planting of native broadleaf woodlands.</p> <p>An Taisce submits that EDE18 Objective 1 should be amended to highlight the need to rapidly move away from the use of peat in horticulture, the extraction of which is highly</p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted.</p> <p>The Council welcomes comments on EDE18 Objective 1 from An Taisce and understand the need for more native woodlands and reduction in the use of peat in horticulture.</p> <p>Policy and objectives are included in the Plan on trees and tree planting in Chapters 3 and 4. In particular GI5 Objective 3 ensures</p>

	<p>ecologically damaging and causes the release of significant amounts of carbon.</p> <p>An Taisce welcomes EDE18 Objective 2 which supports farm diversification and agri-tourism but submits that specifically promote the objective specifically promotes the production of vegetables, grains, nuts, pulses, fruits, etc.</p>	<p>compliance with the South Dublin Climate Action Plan and the provisions of the Council's Tree Management Strategy, this includes for an increase in the County's tree canopy cover by promoting annual planting, maintenance preservation and enhancement of trees, woodlands and hedgerows within the County using locally native species and supporting their integration into new development.</p> <p>The use of peat for horticulture is subject to national policy. EDE18 Objective 1 will allow for the application of national policy where it arises.</p> <p>It is not appropriate to list the type of crops that can be incorporated into EDE18 Objective 2 which supports farm diversification and agri-tourism.</p> <p>It is considered that the issues raised are sufficiently addressed in the existing policies and objectives in the Draft Plan.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
<p>SD-C195-214 Brock McClure Planning and Development Consultants</p>	<p>Submission brings the Councils attention to the ambitions of the landowner to develop the site into a Retirement and Later Living Facility, Healthcare Facilities and associated community uses listed in the Masterplan. Submitted that the current Draft CDP is a barrier to the progress of the development, with the potential for the site to remain undeveloped for another lifecycle.</p> <p>Submission states that in order to facilitate the uses at this location#, the RU zone should be expanded to include other uses as 'Permitted in Principle' and 'Open for Consideration', which are suitable in a rural setting for health and wellbeing purposes, including <b>housing for older people, key worker accommodation (in appropriate settings), nursing</b></p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted.</p> <p>The submission relates to Orlagh House, a protected structure, and grounds at Gunnyhill, Rathfarnham. It is stated that the lands comprise a total of 17.4 hectares of which 13.4 hectares is proposed for development. The submission seeks to extend the land use types within the zoning matrix RU – Rural to include nursing homes, housing for older people, key worker accommodation, and associated health care and recuperation uses as either permitted or open for consideration. Should this not be considered appropriate the submission requests an SLO for the same uses subject to environmental and other assessments.</p>

	<p><b>homes and associated health care and recuperation uses.</b></p> <p>Submission suggests that if an extension to the land use zonings under RU are not considered appropriate that an SLO should be inserted to read:</p> <p><i>'To facilitate a retirement and aged care facility within a rural setting, including nursing home, Recovery Facilities, Later Living Units, Key worker Accommodation and associated recreational facilities at Gunny Hill, Rathfarnham subject to environmental assessments, visual assessment, topographical detail, conservation assessments and due consideration being given to ensuring sensitive design and conservation of historical, architectural and archaeological features of the existing buildings and land.'</i></p> <p>Submission believes development of the site can facilitate significant planning gain through the provision of a greenway link to the Dublin Mountains and associated road upgrades, which will happen as part of this overall development.</p> <p>Submission also mentions that the landowner is willing to facilitate a bus terminus on the lands for an extension of the No. 15 bus, which will also benefit the recently grants Educate Together Secondary School on an adjoining site.</p> <p>As part of this submission an architectural development brief was attached for the associated lands, which was considered as part of the overall submission.</p>	<p>The RU zoning objective is 'To protect and improve rural amenity and to provide for the development of agriculture'. The permitted uses include agriculture, extractive industry, rural food industry, open space, airfield, concrete/asphalt plant in or adjacent to a quarry and public services. The permitted uses primarily relate to those that dependent on the land. There are a number of uses open for consideration including primary health care centre but notably this is restricted to villages to serve local need.</p> <p>South Dublin's rural area is identified as an area under significant urban pressure for housing. Policy in relation to rural housing reflects this urban pressure by restricting housing to local need. While it is recognised that the proposal is for a health care campus the proposal involves significant accommodation.</p> <p>Section 9.8 of the Draft Plan makes clear the requirement to balance the need for social and economic activity with the protection of the environment and the character of the rural landscape. In recognising this, rural diversification is supported through Policy EDE18:</p> <p><i>Support sustainable rural enterprises whilst protecting the rural character of the countryside and minimising environmental impacts.</i></p> <p>EDE18 Objective 3 states: <i>To protect agriculture and traditional rural enterprises from unplanned and/or incompatible urban development.</i></p> <p>The Landscape Character Assessment identifies this area as within the Dodder Valley and Glenasmole landscape character area. It is noted that the landscape features and elements that contribute to character are well maintained and intact and that its highly attractive character and diversity of scenic qualities is appreciated by the many recreational uses functioning as an area of county and/or regional significance for recreational uses. The submission</p>
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		<p>compares the SLO they are seeking to the one for Woodtown Manor in the Draft Plan. However, the SLO for Woodtown Manor relates to tourism and recreation, uses which relate to the lands location within a rural area and for which 'recreational-facility' is provided for in the RU zoning as open for consideration. It is considered that the proposal in this case does not relate.</p> <p>Policy in the Draft Plan supports compact growth and sustainable development. Notwithstanding the offer of facilitating a bus stop and a greenway, the proposed development is not considered to be sustainable or compact, located as it is within a scenic rural setting with limited accessibility. The proposed development would facilitate urban sprawl into the rural uplands of the county, contrary to a compact form of development, to rural diversification policy and to COS6 Objective 1 which states:</p> <p><i>To facilitate the development of community-based care including primary health care centres, hospitals, clinics, and facilities to cater for the specific needs of an ageing population in appropriate urban areas in accordance with the Development Plan core and settlement strategy, consistent with RPO 9.23 of the RSES.</i></p> <p>Having regard to the reasons set out above, it is considered that the proposal to provide for extensive health care facilities within this sensitive rural area of the County is inappropriate and contrary to regional policy and to policy set out in the Draft Plan.</p> <p><b>CE Recommendation</b> No change to the Draft Plan</p>
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Tourism and Leisure		
Submission No.	Submission Summary	CE response and recommendation

<p>SD-C195-3 Elizabeth Davidson</p> <p>SD-C195-109 South Dublin Conservation Society</p>	<p>Submissions state that EDE19 objective 3 should be removed from the County Development Plan, as the matter is still before the courts and decision is pending. one of these submissions also request that the Dublin Mountain Visitor centre be shelved and a smaller project proposed which incorporates local historical properties in the area.</p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted.</p> <p>It is noted that the Corporate Plan 2020-2024, adopted by the Members of South Dublin County Council includes the objective to–continue to develop and deliver the Dublin Mountain Tourism Flagship Project subject to planning.</p> <p>Planning permission was granted by An Bord Pleanala and was subject to judicial review. While this has significantly progressed through the courts it is considered that the objective can be simplified.</p> <p><b>CE Recommendation:</b></p> <p>Amend EDE19 Objective 3 to read:</p> <p>From</p> <p>To support the development of the Dublin Mountains Visitor Centre at Hell Fire and Massy’s Wood in accordance with permission granted by An Bord Pleanála in June 2020 or any amending permissions</p> <p>To</p> <p>To support the development of the Dublin Mountains Visitor Centre at Hell Fire and Massy’s Wood subject to planning</p>
<p>SD-C195-18 Ross Killen</p>	<p>The submission indicates the Brittas Ponds, which they reside in close proximity to, were once used for recreational purposes to a much greater degree than how they are used today and it is proposed that the Ponds should be used for rural tourism and recreation for not only the residents in the area but for the wider region.</p> <p>It is highlighted that the Ponds are strategically located on the Dublin/Wicklow Border, have historical, visual and natural</p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted.</p> <p>The Draft Plan includes section 5.3 on Sustainable Rural Neighbourhoods. Brittas is identified as a rural village which location presents opportunities for tourism development which could support the local economy.</p> <p>QDP12 SLO 1 of the Draft Plan states:</p>

	<p>amenities and potential to contribute to the broader plan for the "Rural Uplands" neighbourhood. It is submitted that the amenity is underutilised, inaccessible, run-down, underdeveloped and almost unknown outside of the immediate area.</p> <p>It is requested that South Dublin County Council should engage with local landowners and stakeholders, including the Brittas Fly Fishing Club to open up the ponds and take advantage of the Ponds. It is contended that the development of the Ponds will provide for local employment opportunities, support existing businesses and encourage people to visit the area. The submission highlights potentials uses in which the Ponds could potentially cater for to include: Fishing; Boating/sailing; Berths; Walkways/tracks around the perimeter; Holiday accommodation; Canoeing/kayaking/paddle boarding; Tourism; Picnic spot; Camping; Nature tours/walks; Historical tours/walks; and Viewpoints. The submission further highlights the development of Ponds could be linked to the Wider Greenway project 'Dodder-Blessington Greenway Link'.</p>	<p><i>To support Brittas as a sustainable community and rural village of outstanding natural beauty and to prepare a planning study and study boundary for Brittas Village, in consultation with local residents, landowners and local representatives, having regard to the implications of the proposed Natural Heritage Area designations, the future population and enhancement of the village and to development of a tourist and leisure facility to include accommodation, associated services and activities at Brittas Ponds and surrounding lands with a view to maintaining and protecting existing assets and the long-term viability of the local community. The planning and tourism study shall be commenced within 12 months of the adoption of this County Development Plan and shall include an analysis of population and housing data.</i></p> <p>It is considered that QDP12 SLO 1 as a component towards the future revitalization and tourism development of Brittas and its tourism potential is appropriately supported under this SLO.</p> <p><b>CE Recommendation:</b> No change to the Draft Plan.</p>
<p>SD-C195-64 Saggart Village Residents' Association</p> <p>SD-C195-251 Cllr Trevor Gilligan PC</p>	<p>The submissions acknowledge this Development Plan's strong commitments to promote heritage and tourism in the area and in creative ways; and the Saggart Village Resident Association would welcome the opportunity to work with SDCC and other stakeholders to achieve these goals including EDE20 Objective 2, EDE22 SLO 1 and NCBH20 SLO 2,</p>	<p><b>CE Response:</b></p> <p>The Chief Executive welcomes the submission from Saggart Village Residents Association and Cllr Trevor Gilligan PC, in working with SDCC and other stakeholders in achieving goals for EDE20 Objective 2, EDE22 SLO 1 and NCBH20 SLO2.</p> <p><b>CE Recommendation:</b> No change to the Draft Plan.</p>
<p>SD-C195-53 Hellfire Massy Residents Association</p>	<p>The submission refers to EDE19 Objective 3 and 4 and has proposed an amended objective to read 'to support the creation of a network of small access points for tourism enterprises and facilities throughout the area which could</p>	<p><b>CE Response:</b></p> <p>The submission is noted.</p>

	<p>distribute footfall more evenly throughout the region with less potential impact on natural amenity and biodiversity’.</p>	<p>There are various policies in the Draft Plan supporting appropriately scaled tourism facilities and networks as outlined below:</p> <p>Policy EDE20: Greenways, Trails and Loops: Support and facilitate the development of an integrated network of Greenways (combined off road cycle and walking routes) and Trails (walking routes) along suitable corridors, with local connections to villages and attractions and to take account of the environmental sensitivities along these corridors.</p> <p>EDE21 Objective 1: To promote the active use of managed forests for tourism and leisure related activities subject to an appropriate scale of development having regard to the pertaining environmental conditions and sensitivities, scenic amenity and availability of services.</p> <p>EDE24 Objective 2: To promote and facilitate the continued development of the Dublin Mountains Way and the Wicklow Way in association with the Dublin Mountains Partnership, particularly Permissive Access Routes that provide access to regional and local networks of walking, running, hiking and mountain bike trails and other recreational facilities provided that such routes/trails and their use does not significantly impact on environmentally sensitive sites.</p> <p>EDE19 Objective 3 supports the Dublin Mountains Way Visitor Centre. This is supported in the Corporate Plan of the Planning Authority, and it is not considered appropriate to replace this objective noting also the inclusion of the objectives outlined above which reflect the intent of the proposed amendment.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
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<p><a href="#">SD-C195-53 Hellfire Massy Residents Association</a></p>	<p>The submission has correctly highlighted that EDE21 SLO1 refers to Woodlands Manor House but the correct name is Woodtown Manor.</p>	<p><b>CE Response:</b></p> <p>The submission is noted. The information on Woodtown Manor is welcomed and it is considered appropriate to amend EDE21 SLO1 to reflect the correct name.</p> <p><b>CE Recommendation:</b></p> <p>Amend EDE21 SLO1 to change Woodlands Manor House to the correct name of Woodtown Manor.</p> <p>EDE21 SLO1: To facilitate leisure, recreation, outdoor activities, sporting pursuits centre, accommodation and tourism activity at <b>Woodtown Manor</b> and lands at Stocking Lane, Rathfarnham in line with Dublin Mountains High Amenity Land Use Zoning subject to environmental assessments, visual assessments, topographical detail, conservation assessments and due considerations being given to ensuring sensitive design and conservation of historical, architectural and archaeological features of the existing buildings and land.</p>
<p><a href="#">SD-C195-14 Department of Transport</a></p>	<p>The Department of Transport Greenways Unit supports projects that will link the Dodder Greenway to the Blessington Loop Greenway in Wicklow and projects that will link the Grand Canal Greenway to the Royal Canal Greenway in Fingal through Lucan as well as the opening of the Grand Canal Section from 12th Lock to Hazelhatch, which will link into the Kildare and Offaly sections of the Grand Canal Greenway.</p>	<p><b>CE Response:</b></p> <p>The support is welcomed. SDCC will work with the relevant stakeholders to create linkages through the proposed greenway projects.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p><a href="#">SD-C195-213 An Taisce</a></p>	<p>The An Taisce submission welcomes the provisions of EDE19 Objective 2 to direct tourism development to established centres. The submission notes that future tourism and recreational visitor promotion nationally should be as car-free as possible and requires a new tourism model based on longer area based stays accommodated in areas where the</p>	<p><b>CE Response:</b></p> <p>The content of the submission is noted.</p> <p>The need to integrate sustainable transport with tourism is acknowledged and supported by the Draft Plan. This is supported by EDE19 Objective 1 <i>To support the development of tourism infrastructure, attractions, activities and facilities at appropriate</i></p>

	<p>host environment can accommodate the level of development.</p> <p>However, the submission notes that there is an overall need to better integrate sustainable transport with tourism. The submission recommends the inclusion of additional explicit objectives to:</p> <ul style="list-style-type: none"> <li>-Increase the access to public transport, walking and cycling options from key tourist destinations and accommodation hubs;</li> <li>-Increase car-free, long-stay trips; and</li> <li>-Provide for additional tourist accommodation in appropriate locations, particularly in areas with existing services and infrastructure.</li> </ul> <p>The submission also welcomes policies and objectives to continue promoting the development of walking and cycling routes greenways. The submission submits that Policy EDE20 and EDE20 Objective 1 could be amended to specifically commit to avoiding conflicts with sensitive ecological sites and ensuring compliance with the Habitats and Birds Directives. The submission also notes that to maximise climate benefits, minimise emissions and improve accessibility all new greenway developments are well connected to urban/village centres, residential areas, employment centres, etc.</p> <p>An Taisce also notes that significant curtailment of current traffic generation levels is required on routes providing access to the Dublin Mountains, the route via Rathfarnham and Kilakee to the Sally Gap is noted in particular. A significant curtailment of current traffic generation levels is recommended as a requirement by the submission with alternative access provided by:</p>	<p><i>locations subject to sensitive design and demonstrated environmental safeguards</i></p> <p>and by EDE19 Objective 2: <i>To direct tourist facilities into established centres, in particular town and village centres, where they can contribute to the wider economic vitality of urban centres.</i></p> <p>In addition, Policy EDE20 states: <i>Support and facilitate the development of an integrated network of Greenways (combined off road cycle and walking routes) and Trails (walking routes) along suitable corridors, with local connections to villages and attractions and to take account of the environmental sensitivities along these corridors</i></p> <p>Policy EDE20 and its objectives are closely related to SM2 of the sustainable transport chapter.</p> <p>Chapter 7 Sustainable Movement in the Draft Plan emphasises the need to move to more sustainable forms of transport and contains significant policy on active travel and public transport. The overarching Policy SM1 states: <i>Promote ease of movement within, and access to South Dublin County, by integrating sustainable land-use planning with a high-quality sustainable transport and movement network for both people and goods.</i></p> <p>The objectives as worded in the Draft Plan already indicate that environmental sensitivities have to be account of in developing a network of greenways. This is further referenced in G112 Objective 8 to take all possible steps to mitigate the impacts on biodiversity of increased recreation within the GI network and by NCBH2 and 3 which requires appropriate assessment for both plans and projects in line with the Habitats Directive.</p> <p>Section 5.2.4 Connected Neighbourhoods sets out how the provision of high-quality public transport, greenways and</p>
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	<p>- Providing new, safe and attractive walking paths from the terminus of bus routes, including to the Hell Fire Club on Montpellier Hill and Three Rock Mountain</p> <p>-The wider visitor management of the Dublin and Wicklow Mountain area to international National Park Standards; providing shuttle bus access for walking, hiking and cycle hire; and curtailing non-local need through traffic.</p>	<p>cycleways enhances an area, contributing to more attractive places, creating opportunities for a healthier lifestyle through physical activity and reducing the negative consequences of car-based commuting.</p> <p>It is considered that the Draft Plan deals extensively with both avoiding conflicts with sensitive ecological sites, as well as providing for policy linking greenways to neighbourhoods and urban places and promoting sustainable travel.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan</p>
<p>SD-C195-211 Fáilte Ireland National Tourism Development Authority</p>	<p>Submission makes a number of recommendations with regards to tourism in the County as follows:</p> <ul style="list-style-type: none"> <li>- This submission suggests that the CDP acknowledges the expiration of the Tourism Strategy during the lifetime of the CDP and should include an objective to review and prepare an updated Tourism Strategy.</li> <li>- This submission requests the inclusion of an objective supporting the preparation and implementation of Regional Tourism Strategies in the County Development Plan, to support the continues collaboration with Fáilte Ireland and tourism stakeholders to ensure successful implementation and delivery of these tourism plans.</li> <li>- This submission requests an objective acknowledging and supporting Destination Experience Development Plans, with an objective supporting continued collaboration with Fáilte Ireland and tourism stakeholders to ensure successful implementation and delivery of these Destination Experience Development Plans.</li> </ul>	<p><b>CE Response:</b></p> <p>The contents of the submission from Fáilte Ireland are noted.</p> <p>The value of many of the recommendations outlined in the Fáilte Ireland submission are acknowledged. However, it is considered that the SDCC Tourism Strategy (2015) and the SDCC Local Economic and Community Plan already address many of the recommendations that have been raised. The SDCC Tourism Strategy includes objectives and related actions centering on the journey, awareness, experiences, collaboration and marketing, and seeks to improve arrival and wayfinding information, create new experiences and link destinations and enhance the marketing of the County.</p> <p>It is considered that the SDCC Tourism Strategy is the appropriate mechanism for setting out SDCC's comprehensive strategy for tourism and it is not considered necessary to include a dedicated Chapter on tourism and recreation in the County Development Plan. Policy Objective EDE19: Tourism Infrastructure supports the development of a sustainable tourism</p>

	<ul style="list-style-type: none"> <li>- This submission states that as part of the €15.5 million 'Destination Towns' initiative funding has been allocated to Lucan with hope that this investment can be identified as a catalyst for further interventions by SDCC.</li> <li>- This submission states the approach to Tourism in the CDP needs to place a stronger emphasis on 'Sustainable Tourism', where it should be considered a dedicated sub-section to ensure it is enshrined throughout tourism policy for the county.</li> <li>- This submission hopes for the continued partnership and collaboration between Waterways Ireland, Fáilte Ireland and South Dublin County Council should be supported in the forthcoming Development Plan in response to the delivery of the canal greenway link.</li> </ul>	<p>industry that recognizes the recreational and tourism potential of the county.</p> <p>Section 9.9 of the Draft Plan makes includes for wide areas of tourism and makes reference to Policy EDE19 Tourism Infrastructure, where it states it will build on the Actions of the South Dublin County Tourism Strategy 2015, or any superseding strategy, which highlights the need for an updated tourism strategy.</p> <p>The preparation and implementation of Regional Tourism Strategies is supported by the Council and understands the County Development Plan is important to the implementation of these strategies. RPO 6.15 looks to support the preparation and implementation of Visitor Experience Development Plans within the Region to underpin the overarching regional tourism brands and to deliver greater tourism benefits and to promote the natural and cultural assets of the Region. This lies outside the Development Plan which is a strategic land use plan not exclusive to tourism. It is considered that Destination Experience Development Plans is not an issue for the Draft Plan and is better placed within the SDCC Tourism Strategy.</p> <p>Policy EDE19 supports the development of a 'sustainable' tourism industry. The sustainability of tourism projects is addressed throughout the plan recognising that in many instances tourism projects, by their nature, are located in sensitive environments. In this regard, policy in Chapter 3 and 4 on Heritage and Green Infrastructure, in particular relate.</p> <p>The Council welcomes Fáilte Ireland's funding commitments on Destination towns and agrees that it will help as a catalyst for further interventions. The Council will continue to work with Waterways Ireland, Fáilte Ireland and other relevant stakeholders in the delivery of the Grand cCnal greenway link.</p> <p><b>CE Recommendation:</b></p>
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		No change to the Draft Plan
SD-C195-211 Fáilte Ireland National Tourism Development Authority	The Fáilte Ireland submission recommends that South Dublin County Council promote more accessible tourism throughout the county, with a proposed new objective in section 9.9 stating, 'It is an objective of the Council to support the provision of accessible tourism'.	<p><b>CE Response:</b></p> <p>This submission is noted.</p> <p>Under the Disability Act 2005: Fáilte Ireland Disability Complaints Procedure, by law, Fáilte Ireland must make its buildings, services and information accessible to people with disabilities.</p> <p>The submission seeks to include an objective for accessible tourism so that facilities are accessible to people with mobility issues, people with learning disabilities, visual or hearing impairment, young children and elderly people.</p> <p>The merit of this is fully recognised. However, the Draft Plan comprehensive provides for objectives in relation to universal accessibility including:</p> <p>QDP4 Objective 2 looks to promote a high standard of building and urban design, creating public spaces that are distinctive, safe, universally accessible and facilitate social and cultural diversity and interaction.</p> <p>COS1 Objective 1 looks to provide appropriate and accessible community facilities to meet the needs of all citizens of the County and Policy COS2 which supports the planned provision of a range of universally accessible and well-connected social, community, cultural and recreational facilities.</p> <p>Section 13.4.1 of the Draft Plan includes implementation on universal design setting out that 'The design and layout of development schemes, public realm and community infrastructure should incorporate universal design insofar as is feasible, having regard to the provisions of the National Disability Authority 'Building for Everyone: A Universal Design Approach - Planning and Policy' (2012).</p>

		<p>Larger scale development proposals should include an Access Statement setting out how universal design approaches will be featured within the development’.</p> <p>It is considered that the Draft Plan comprehensively promotes accessibility, where all developments should be designed and located to be publicly accessible for all ages and abilities.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
SD-C195-211 Fáilte Ireland National Tourism Development Authority	The submissions highlights the changing environment of Digitalization of the tourism sector, especially from the Covid-19 pandemic. A new objective is sought in section 9.9 stating 'Encourage and support investment in digital technology in the tourism sector, with a particular focus on sectors such as visitors attractions and activities with low digital presence and/or integration'.	<p><b>CE Response:</b></p> <p>The content of the submission is noted.</p> <p>The Council understand the changing environment of digitalization in the tourism sector of our economy. Part 3 of the South Dublin Tourism Strategy and Road Map, states <i>‘The Tourism Section will be responsible for the implementation of marketing, promotional and branding activities in collaboration with other corporate functions. This key function includes the creation and maintenance of marketing platforms and digital marketing activities’.</i></p> <p>The strategy supports the creation of a full digital platform. It is considered that digitalization of the tourism sector are appropriately supported in the SDCC Tourism Strategy at present and support for that strategy is included in the Draft Plan.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
SD-C195-211 Fáilte Ireland National Tourism Development Authority	This submission looks for the Council to contribute actively to the development of great visitor experiences in food tourism by providing support for key food initiatives such as food festivals and urban outdoor markets that create an opportunity for local food producers/providers to showcase	<p><b>CE Response:</b></p> <p>The content of the submission is noted.</p>

	<p>their food and beverage offering, create a sense of community and provide a great visitor experience</p>	<p>EDE22 Objective 5 looks to support local outdoor markets and festivals and associated enabling infrastructure in appropriate locations within the County including outdoor festivals as drivers for tourism growth.</p> <p>It is considered that food tourism, as a component of Economic Development and Employment, are appropriately supported under the policies and objectives EDE22 Objective 5 within the Economic Development and Employment chapter of the plan.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
<p>SD-C195-211 Fáilte Ireland National Tourism Development Authority</p>	<p>This submission welcomes reference to the 'Dublin Surprising by Nature' campaign, with the following adjustment and inclusion of a new policy included in the plan:</p> <p>Proposed amended text Section9.9: 'In continuing the positive working relationships through the Dublin Tourism Working Group with Fáilte Ireland to make the best use of the 'Grow Dublin' tourism project and the 'Dublin-Surprising By Nature' Brand (Remove marketing concept).</p>	<p><b>CE Response:</b></p> <p>The submission is noted and it is considered appropriate to amend the text in the Draft Plan where it relates to the 'Dublin – Surprising By Nature' marketing concept.</p> <p><b>CE Recommendation:</b></p> <p>Amend the Draft Plan as follows:</p> <p>Section 9.9: 'In continuing the positive working relationships through the Dublin Tourism Working Group with Fáilte Ireland to make the best use of the 'Grow Dublin' tourism project and the 'Dublin-Surprising By Nature' <b>brand</b>.</p>
<p>SD-C195-211 Fáilte Ireland National Tourism Development Authority</p>	<p>Proposed new Policy EDE19 Objective 5: Promote, encourage and facilitate the implementation of the 'Dublin Brand Proposition and its objectives in co-operation with Fáilte Ireland, the Dublin Tourism Working Group and adjoining local authorities.</p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted.</p> <p>The Draft Plan sets policy and objectives which relate directly to spatial land use and development. It is considered inappropriate to include the following policy objective for EDE19 within the Draft Plan, as it is more appropriately dealt with in the SDCC Tourism Strategy which is supported by the Draft Plan.</p>

		<p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
<p>SD-C195-211 Fáilte Ireland National Tourism Development Authority</p>	<p>This submission proposes a new submission in Section 9.9 Tourism Section which reads 'To continue to engage and collaborate with tourism stakeholders including Fáilte Ireland to deliver on the Tourism objectives for the County'.</p>	<p><b>CE Response:</b></p> <p>The submission is noted.</p> <p>The text within Section 9.9 Tourism and Leisure indicates how a continuing positive working relationship through the Dublin Tourism Working Group with Failte Ireland will generate substantial socio-economic benefits for the County.</p> <p>However, it is considered that the proposed new objective can be included in the Draft Plan.</p> <p><b>CE Recommendation:</b></p> <p>Insert new objective within Policy EDE19 to read:</p> <p>To continue to engage and collaborate with tourism stakeholders including Fáilte Ireland to deliver on the Tourism objectives for the County.</p>
<p>SD-C195-211 Fáilte Ireland National Tourism Development Authority</p>	<p>This submission looks for the following amendment to Policy EDE19: Tourism Infrastructure:</p> <p>Proposed amended Policy EDE19: Tourism Infrastructure  'EDE19 Objective 1: To support the development of tourism infrastructure, attractions, activities, accommodation and facilities at appropriate locations subject to sensitive design and demonstrated environmental safeguards. (inclusion of accommodation)</p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted. The importance of accommodation in developing appropriate tourism infrastructure for South Dublin is recognised.</p> <p>Extra demand is generated for the accommodation sector as flagship tourist products increase, typically involving an overnight stay. As part of the South Dublin Tourism Strategy (2015), one of the supporting initiatives is identifying locations for alternative accommodation in order to diversify the range of accommodation offer in the County.</p> <p>Therefore, it is considered appropriate to amend EDE19 Objective 1, to include accommodation.</p>



		<p><b>CE Recommendation:</b></p> <p>Amend EDE19 Objective 1 as follows:</p> <p>To support the development of tourism infrastructure, attractions, activities, <b>accommodation</b> and facilities at appropriate locations subject to sensitive design and demonstrated environmental safeguards.</p>
SD-C195-211 Fáilte Ireland National Tourism Development Authority	<p>This submission looks for the following amendment to Policy EDE20: Greenways, Trails and Loops:</p> <p>To support and facilitate the development of an integrated network of Greenways, Greenway Loops and Urban Greenways to encourage tourism and active travel across the County, subject to environmental considerations. (include tourism and).</p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted.</p> <p>It is appropriate to amend EDE20 Objective 1 to include the words 'tourism and' to highlight the importance that Greenways, Greenway Loops and Urban Greenways have on tourism in South Dublin.</p> <p><b>CE Recommendation:</b></p> <p>Amend EDE20 Objective 1 to read:</p> <p>To support and facilitate the development of an integrated network of Greenways, Greenway Loops and Urban Greenways to encourage <b>tourism and</b> active travel across the County, subject to environmental considerations.</p>
SD-C195-211 Fáilte Ireland National Tourism Development Authority	<p>This submission looks for the following amendment to Policy EDE21: Tourism and Leisure Activities:</p> <p>EDE21 Objective 3: To support the development of water based tourism and leisure activity, and support both enhancement of existing and development of new access to water locations in the County for recreational purposes. The provision of shared facility centres for water based activities in the County subject to an appropriate scale of development having ....</p>	<p><b>CE Response:</b></p> <p>The content of the submission is noted.</p> <p>EDE21 Objective 3 states:</p> <p><i>To support the development of water-based tourism and leisure activity, subject to an appropriate scale of development having regard to the pertaining environmental conditions and sensitivities, scenic amenity and availability of services.</i></p>

		<p>The existing objective, in supporting the development of water-based tourism and leisure activity would have to provide access to those activities as part of any development. There are a number of objectives contained within the Green Infrastructure and Heritage chapters of the Plan that provide for sustainable access to water locations recognising that many of the locations within South Dublin are important ecological corridors with associated sensitivities.</p> <p>It is considered that the objective in the Draft Plan is sufficient to support water based tourism and access to same.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan</p>
<p>SD-C195-222 Tallaght Community Council</p>	<p>Submission looks for the inclusion of the following points in the Draft Plan:</p> <ul style="list-style-type: none"> <li>- New SLO to promote and support the development of a tourist amenity and educational/interpretive centre, such as a demonstration mill, within the Dodder Valley.</li> <li>- NEW SLO looking at the SDCC tourism research in 2013 reported 'Tallaght' as a placename as a weakness to the region due to a poor national perception. To counter this and to deliver the maximum positive brand impact, we wish to retain Tallaght as the primary name for this highly performing and highly positive brand asset for Tallaght until 2026 at the earliest.</li> <li>- New SLO to clearly signpost the Poddle river in Bancroft Park and Tymon Park. To also signpost the bridge at The Priory and Bancroft Park where the Poddle flows underground - the existing wall's design does capture the bridge shape.</li> </ul>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted.</p> <p>Under NCBH26 Objective 2, the Council seeks to protect, preserve, maintain and promote industrial heritage features including weirs, mills and mill races along the River Dodder and River Liffey. It is considered that all mill assets along the Dodder Valley, as a component of tourism infrastructure, are appropriately supported under NCBH26 Objective 2.</p> <p>While it is not completely clear what the submission is looking for in relation to the Tallaght brand, the Draft Plan reflects Tallaght as the County town for South Dublin, acting as the headquarters for South Dublin County Council. Tallaght Town Centre has emerged over the last two decades as a centre for civic and institutional uses in addition to retailing and hospitality services.</p> <p>The provision of a high-quality public realm such as the Tallaght Public Realm and Civic Square is key to the achievement of this successful and sustainable neighbourhood.</p>

	<p>- New SLO for a Tourism / visitor Viewing Facilities in Tallaght to take in the full mountain range from Tallaght Hill to 2 Rock and Dublin Bay - leverage existing elevated sites to create public viewing / photograph sites as you see in the West of Ireland - viewing binoculars, view information boards, QR codes for digital details.</p>	<p>The Draft Plan also identifies tourism as a significant economic driver, supporting job creation across a diverse range of sectors. The development of tourism within this area is centred on the significant built heritage assets and the Dodder Valley Park and Greenway connecting this area and the County to the Dublin and Wicklow mountains.</p> <p>The Draft Plan contains objectives relating to signage including EDE21 Objective 2</p> <p><i>To implement signage in the County in accordance with the Tourism and Signage Strategies for the County, to include consideration of information signage on nature and other features to be found along the rivers in the County at strategic locations.</i></p> <p>It is considered that the matters raised have been adequately dealt with through strategic policy in the Draft Plan.</p> <p><b>CE Recommendation:</b></p> <p>No change to Draft Plan.</p>
<p>SD-C195-195 Eamonn Prenter</p>	<p>In order to recognise that tourism facilities and amenities are tied very much to where the tourism asset is located, which may not be wholly within a village or urban environment, the submission suggests that EDE19 Objective 2 be amended to read as follows:</p> <p>EDE19 Objective 2 – To normally direct tourist facilities into established centres, where this is possible, in particular town and village centres, where they can contribute to the wider economic vitality of urban centres.</p> <p>In addition, the submission suggests that the following new objective be incorporated into Policy EDE21, directly after EDE21 Objective 3:</p> <p>New EDE21 Objective 4 – To enhance public access to existing water features and bodies for tourism and leisure</p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted.</p> <p>Policy EDE19 provides strategic level support for the sustainable development of tourism infrastructure within South Dublin. As stated in EDE19 Objective 1, SDCC will look to support the development of tourism infrastructure, attractions, activities and facilities at appropriate locations subject to sensitive design and demonstrated environmental safeguards.</p> <p>However, it is recognised that there could be some instances where particular tourist facilities due to their nature, may be in locations outside urban centres. It is therefore considered appropriate to amend EDE19 Objective 2 to include the word</p>

	<p>purposes within the county subject to the maintenance of high levels of water quality and environmental assessment.'</p> <p>The submission also requests that the following additional objective to Policy EDE21:</p> <p>New EDE21 Objective 7 – Promote angling within the county subject to the adequate maintenance of fish stocks and water quality.</p>	<p>'generally' before the words 'direct tourist facilities into established centres.'</p> <p>In relation to public access to water features, EDE23 Objective 1 looks to promote the preservation of public rights of way that give access to mountain, lakeshore, riverbank and other places of natural beauty or recreational utility within the Draft Plan. EDE24 Objective 1 also promotes access through permissive access routes. GI1 Objective 3 also facilitates sensitive access to areas of interest for residents, wildlife and biodiversity.</p> <p>It is considered that the enhancement of access to water features and bodies for tourism and leisure purposes are adequately supported under the objectives outlined.</p> <p>With respect to angling, EDE21 Objective 21 looks to support the development of water-based tourism and leisure activity, subject to an appropriate scale of development having regard to the pertaining environmental conditions and sensitivities, scenic amenity and availability of services.</p> <p>NCBH2 Objective 4 looks to protect our rivers and in particular to avoid overdevelopment which could have an adverse effect on the biodiversity and ecosystems of the rivers. These policies reflect the need to support sensitive development and protection of river ecosystems within South Dublin while facilitating recreation including angling.</p> <p><b>CE Recommendation:</b></p> <p>Amend EDE19 Objective 2 in the Draft Plan to read:</p> <p>To <i>primarily</i> direct tourist facilities into established centres, in particular town and village centres, where they can contribute to the wider economic vitality of urban centres.</p>
<p>SD-C195-170 Dublin Cycling Campaign</p>	<p>The submission welcomes this objective and suggests that restoration of the Silver Bridge is explicitly included in it.</p>	<p><b>CE Response:</b></p>

	<p>“EDE20 Objective 3: To support and facilitate the development of accessible links into and along the Liffey Valley including at the Silver Bridge and between the Grand Canal and the Royal Canal subject to environmental sensitivities.”</p>	<p>The support towards EDE20 Objective 3 within the Draft Plan is welcomed.</p> <p>It is noted that NCBH19 SLO1 provides for the refurbishment and re-use of the metal (silver) bridge as part of an inter-county greenway.</p> <p>The restoration of the Silver Bridge is therefore adequately covered in NCBH19 SLO1</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p>SD-C195-154 Tallaght Community Council</p>	<p>The submission requests the following SLO to be added:</p> <p>To protect the historic village core of Tallaght, recognising the role it has to play in place making and tourism.</p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted.</p> <p>Section 9.5.5 Village Centres within the Draft Plan makes clear that villages have a unique heritage character and offer a diverse range of retail services, as well as providing tourism services and acting as a focal point for the community.</p> <p>Policy EDE13 and its objectives further set out protections to preserve the special character of the historic core of traditional villages.</p> <p>QDP Objective 3 also provides for design standards and densities in village centres that are informed by the surrounding village and historic context.</p> <p>It is also noted that Tallaght Village is within an Architectural Conservation Area</p> <p>The SLO requested by Tallaght Community Council has been extensively covered in the Draft Plan.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>

<p>SD-C195-154 Tallaght Community Council</p>	<p>The submission names the tourism potential of Katherine Tynan's house, Whitehall, the Priory, Dublin Mountain Way walking trail.</p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted. While the tourism potential of many of the locations is acknowledged most are in private ownership. Notwithstanding, the Draft Plan contains supportive policy and objectives to provide for tourism related development and infrastructure should these buildings come forward. It is noted that planning permission has applied for at Katherine Tynan's house, a protected structure, as a community centre and a request for additional information was made in July 2021.</p> <p>Policy EDE20 and EDE24 provide supportive policy for greenways and trails (walking routes).</p> <p>It is considered that the policy and objectives in the Draft Plan support the issues raised.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p>SD-C195-154 Tallaght Community Council</p>	<p>The submission requests the following SLOs to be included:</p> <p>To design and establish an attractive recurring and regular tourist event with a mass market offering (Urban Market, Gaelforce) to be located in Tallaght.</p> <p>To develop and support a walking festival to establish Tallaght as the gateway to the mountains.</p> <p>It also suggest the following amendment to EDE24 Objective 2 to include – "... and to drive synergies with Tallaght stadium facilities, the green flag park Sean Walsh Park.</p>	<p><b>CE Response:</b></p> <p>The content of the submission is noted.</p> <p>EDE22 Objective 5 of the Draft Plan supports local outdoor markets and festivals and associated enabling infrastructure in appropriate locations within the County including outdoor festivals as drivers for tourism growth.</p> <p>EDE24 Objective 2 sets out to promote and facilitate the continued development of the Dublin Mountains Way and Wicklow Way in association with the Dublin Mountains Partnership, particularly Permissive Access routes that provide access to regional and local networks of walking, running, hiking and mountain bike trails and other recreational facilities provided</p>

		<p>that such routes/trails and their use does not significantly impact on environmentally sensitive sites.</p> <p>EDE24 Objective 4 seeks to bring mountain amenities closer to residential communities through a network of paths and cycleways.</p> <p>Policy EDE22 supports the development of heritage, cultural and events tourism through its objectives.</p> <p>It is considered that policy and objectives in the Draft Plan cover the issues raised.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p>SD-C195-295 Councillor Lynn McCrave</p>	<p>A submission calls for the Development Plan to maximise the potential of the Dodder Greenway through the sympathetic development of the Ely Arch area to include facilities and/or services serving for local residential community as well as the wider tourist community.</p>	<p><b>Response:</b></p> <p>The submission is noted.</p> <p>It is considered that EDE19 Objective 4 adequately covers the proposed objective/issue raised as follows:</p> <p>To support tourism-related enterprises along existing and proposed Green Routes, including greenways, subject to sensitive design and development safeguards.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p>SD-C195-35 Department of Communications, Climate Action and Environment</p>	<p>Submission welcomes the inclusion of EDE22 Objective 2 in relation to Geoheritage, encouraging geology to be a significant part of any tourism initiative that may be introduced.</p> <p>The submission goes on to note EDE21 Objective 4, asking that the design of any future signage for waymarked and</p>	<p><b>CE Response:</b></p> <p>The welcoming for EDE22 Objective 2 is acknowledged.</p> <p>It is considered that policies in relation to the use of information signage to highlight the significance of a County Geological is</p>

	<p>signposted walking routes/trails to consider the use of information panels as appropriate to highlight the significance of a County Geological Site or an area of geological and/or geomorphological interest that are in the vicinity of waymarked and signposted walking routes/trails within South County Dublin. benefiting the geological/ geomorphological aspects of the Dodder Terrace, Kippure, Greenhills Esker and Lucan Esker CGSs which are close to popular walking /hiking routes in South Dublin County.</p>	<p>covered within the Draft Plan in EDE20 Objective 2, EDE21 Objective 4, Section 13.4.1 and Section 13.4.5.</p> <p>Action 8 under Access and Infrastructure within the South Dublin County Tourism Strategy looks to introduce standardized orientation and tourist signage.</p> <p>However, in the interests of clarity, it is considered that EDE21 Objective 4 should be amended to include signage for features additional to that to be found along rivers.</p> <p><b>CE Recommendation:</b></p> <p>Amend EDE21 Objective 4 in the Draft Plan as follows:</p> <p>From</p> <p>To implement signage in the County in accordance with the Tourism and Signage Strategies for the County, to include consideration of information signage on nature and other features to be found along the rivers in the County at strategic locations.</p> <p>To</p> <p>To implement signage in the County in accordance with the Tourism and Signage Strategies for the County, to include consideration of information signage on nature, <b>geology</b> and other features to be found along the rivers and at other strategic locations within the County.</p>
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Permissive Access Routes		
Submission No.	Submission Summary	CE response and recommendation
<a href="#">SD-C195-53 Hellfire Massy Residents Association</a>	<p>The submission has proposed an amendment to the wording of EDE24 Objective 4 'To bring mountain amenities closer to residential communities by promoting the establishment of a network of formal footpaths, off-road</p>	<p><b>CE Response:</b></p> <p>The issue raised in the submission is noted.</p>



	<p>paths and cycleways that facilitate casual walkers and cyclists subject to environmental assessments to ensure that they will not have an adverse effect on the biodiversity and sensitive mountain environments of the mountain amenities to which they are providing access. Taking account the potential cumulative impact on the environment, the additional impact of increased light spill in relation to formal footpaths’.</p>	<p>EDE24 Objective 4 currently states:</p> <p><i>To bring mountain amenities closer to residential communities by promoting the establishment of a network of formal footpaths, off-road paths and cycleways that facilitate casual walkers and cyclists.</i></p> <p>It is considered that EDE24 Objective 4 should be amended to highlight the importance of the environment the network is to provide access to, through appropriate environmental assessments.</p> <p><b>CE Recommendation:</b></p> <p>Amend EDE24 Objective 4 of the Draft Plan to read as follows::</p> <p>EDE24 Objective 4: To bring mountain amenities closer to residential communities by promoting the establishment of a network of formal footpaths, off-road paths and cycleways that facilitate casual walkers and cyclists, <b>subject to considering any environmental impacts through the appropriate environmental assessments.</b></p>
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<b>Quarries and Mineral Extraction</b>		
<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation</b>
<p><a href="#">SD-C195-44 Roadstone Ltd.</a></p>	<p>Roadstone operate 3 quarries in the County. The NPF and RSES support the extractive/ quarry industry at national and local level through NPO 23, RPO 6.7. Supporting also the importance of quarries to the rural economy.</p> <p>The submission welcomes existing policy as stated in Policy EDE25 but submits that it does not go far enough. There is potential to further acknowledge the the socio-economic potential and benefits of quarries and extractive industry.</p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted and support for Policy EDE25 is welcomed.</p> <p>The council understand the importance of quarries and their contribution towards economic development and employment within South Dublin. The Draft Plan, in section 9.10 states that ‘Mineral extraction and the aggregate industry are an important economic sector that provides the raw materials for the construction industry’.</p>

<p>SD-C195-129 Irish Concrete Federation</p>	<p>The importance of quarrying to construction of homes, schools etc across the county should also be recognised.</p> <p>-The Draft CDP could be revised to adequately outline the economic value and significance of the aggregates sector, emphasising the sector's importance in terms of economic development and employment within the county and further afield.</p> <p>The submission notes the expected population growth over the lifetime of the plan and additional need for 17,817 housing units up to 2028. In this regard, it is highlighted that the extractive industry provides the necessary raw materials for the majority of building and infrastructure development in Ireland. Not only homes but also roads, motorways, schools, hospitals, colleges, factories, water and sewerage systems are all constructed with construction aggregates and concrete products. The construction of power stations, railways, wastewater and water treatment plants and sporting stadia is also heavily dependent on the supply of crushed stone, concrete and other building materials made from aggregates.</p> <p>The Irish Concrete Federation highlights the negatives nature given towards the extractive industry in the CDP and that the Plan does not properly acknowledge the importance of the quarrying/extractive industries, stating the South Dublin is home to a number of the largest quarries in the country which underpins construction development.</p>	<p>The economic benefits are also recognised in section 9.10 noting that they need to be balanced against potential environmental impacts.</p> <p>Policy EDE25 itself sets out the Council's support:</p> <p><i>Support the sustainable extraction of aggregate resources at suitable locations within the County subject to environmental safeguards.</i></p> <p>It is considered that the economic benefits and importance of the extractive industry are adequately covered in the Draft Plan.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p>SD-C195-44 Roadstone Ltd.</p>	<p>The provisions of EDE23 Objective 3 around the reinstatement and or re-use of quarries is acknowledged. However, it is submitted that an after use policy for such sites could include biodiversity, sustainable forestry, agriculture, recreation/amenities, industrial, commercial, and residential type uses, should a site offer the potential for such an alternative and/or mix of uses. The submission</p>	<p><b>CE Response:</b></p> <p>The issues raised in the submission are noted.</p> <p>The objective as contained within the Draft Plan EDE25 Objective 3 states:</p>

	<p>requests EDE25 Objective 3 be amended as follows retaining the first sentence and adding additional text:</p> <p>EDE25 Objective 3:</p> <p>To ensure the satisfactory reinstatement and/or re-use of disused quarries and extraction facilities, where active use has ceased. This could include backfilling with inert soil and stone, and possible uses including habitat restoration, sustainable forestry, agriculture, recreation/amenities, commercial, industrial, and residential, or a combination of same, subject to normal planning and environmental considerations.</p>	<p><i>To ensure the satisfactory reinstatement and/or re-use of disused quarries and extraction facilities, where active use has ceased.</i></p> <p>The conditions attached to permissions for quarries include a condition on re-instatement once a quarry use ceases. This will be subject to detailed assessment at the appropriate time taking into consideration the site conditions, the environmental impacts etc. Each site will have different characteristics and re-instatement or otherwise will be site specific. As such, it is considered that the objective as written is appropriate and will allow for the more detailed assessments through development management to meet the requirements of the site.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p><a href="#">SD-C195-44 Roadstone Ltd.</a></p>	<p>it is suggested that the CDP highlights areas containing proven aggregate deposits on an appropriate map.</p>	<p><b>CE Response:</b></p> <p>The issue raised in this submission is noted.</p> <p>The Council recognises under National Policy Objective 23 and the section 28 Quarries and Ancillary Activities Guidelines for Planning Authorities (2004), the planning authority should include a map to show the location of quarries and minerals across the functional area of the County.</p> <p>Noting also the recommendation on this issue from the OPR, it is considered appropriate to include a map highlighting these assets within the Draft Plan. It is also considered that corresponding text should be inserted into section 9.10 Quarries and Mineral Extraction to indicate that the Development Plan maps include the locations of quarries registered under s261A of the Planning and Development Acts.</p> <p><b>CE Recommendation:</b></p>

		<p>1. Amend the draft plan maps to show the location of registered quarries within the County (See Appendix 5 of this report)</p> <p>2. Insert text into section 9.10 Quarries and Mineral Extraction as follows:</p> <p>The location of registered quarries under the Planning and Development Acts is indicated on the Development Plan maps. The mapping of a quarry location does not indicate its current planning status.</p>
<p>SD-C195-129 Irish Concrete Federation</p> <p>SD-C195-213 An Taisce</p>	<p>Submission looks for a commitment included in the CDP for active enforcement against unauthorised extractive developments, with the council committing to only procuring from authorised quarries which operate to best practice across environmental and social pillars.</p> <p>The An Taisce submission submits that an additional policy be included to require strict enforcement against unauthorised development and of conditions applied to permitted quarry development. The submission also considers that Section 35 of the Planning and Development Act 2000 (as amended) regarding past failures to comply should be rigorously applied to proposals for continued or expanding quarrying operations.</p>	<p><b>CE Response:</b></p> <p>The issues raised are noted. It is considered that an objective to include a commitment to enforcement procedures on quarries within the Draft Plan is appropriate given their particular nature and impact.</p> <p>The issue relating to procurement is not an issue for the County Development Plan.</p> <p><b>CE Recommendation:</b></p> <p>Insert new objective under Policy EDE25 as follows:</p> <p>EDE25 Objective 4: To ensure enforcement against unauthorised quarry development and of conditions applied to permitted quarry development and consider action under Section 35 of the Planning and Development Act 2000 (as amended) where appropriate.</p>
<p>SD-C195-129 Irish Concrete Federation</p>	<p>The Environmental Impact Assessment (EIA) Regulations transposing the EIA Directive (2014) require that a meaningful scoping process is undertaken prior to submission of development applications. It is imperative that such a scoping process is implemented for all quarry planning applications and that planning authorities are sufficiently resourced to carry out this process in an effective manner. An effective pre-planning scoping process should</p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted.</p> <p>The benefit of scoping EIA is recognised. This is a matter outside the Development Plan but the need for EIA is recognised within the Plan and is referenced in Chapter 13 Implementation and Monitoring, noting also the relevant 2018 Guidelines on Carrying out EIA.</p>

	<p>reduce the level of additional detail required during application processing.</p> <p>-Given the highly capital intensive nature of the extractive industry in terms of plant, equipment, site infrastructure, landscaping and mitigation measures, the regulatory certainty needed for professional operators can only be provided by the granting of permissions of long term duration. Planning permission durations should be commensurate with the planned extraction of resources present which can often exceed 30 years where important and substantial reserves have been identified.</p> <p>- The planning system should ensure steady and adequate provision of aggregate supplies within the context of a supportive national policy, by issuing sufficient planning consents to meet demand and to help the extractive industry to thrive in a sustainable manner. Priority should be given to existing sites to ensure existing employment and investment is maintained.</p>	<p>Planning permission durations is not an issue for the Draft Plan as the duration of permissions is set out in legislation through the Planning and Development Acts.</p> <p>The Council supports the extractive industry within South Dublin County through Policy EDE25,</p> <p><i>Support the sustainable extraction of aggregate resources at suitable locations within the County subject to appropriate environmental safeguards.</i></p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p>SD-C195-44 Roadstone Ltd.</p> <p>SD-C195-129 Irish Concrete Federation</p>	<p>This submission draws attention to the Irish Concrete Federations 'Essential Aggregates' document, with the key points from this document being included in the Draft CDP. these points are as follows</p> <p>- National Aggregate Planning Policy should be developed by Government to underpin and inform local and regional planning policy.</p> <p>- Drawing from the national policy, the three Regional Assemblies and individual Local Authorities should, as part of their development planning, have regard to and make provision for the protection of strategic aggregate resources within their functional areas.</p> <p>The submission from the Irish Concrete Federation goes on to state that authorised quarries should be protected from</p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted.</p> <p>The formulation of National Aggregate Planning Policy is one for national government and is not one that can be accommodated through the County Development Plan. However, it is noted that section 28 Guidelines for Planning Authorities exist in the form of Quarries and Ancillary Activities Guidelines for Planning Authorities (2004). The Guidelines set out the economic importance of aggregate resources and indicate that Development Plans should contain policy on the protection of the environment and of the landscape.</p> <p>The Draft Plan includes EDE25 Objective 1 and 2 protecting amenity and environmental quality. However, the Guidelines also advise that planning authorities should safeguard valuable</p>

	<p>encroaching development which may disturb future expansion of these critical assets.</p> <p>Roadstone Ltd requested that due regard is given to the fact the county has significant but finite mineral resources and indicates it should be an aim of the Plan to safeguard areas of significant resources from incompatible developments to ensure the continued viability of the extractive industry, whilst of course, ensuring that environmental, rural, scenic, and residential amenities are protected. The submission emphasizes the need to safeguard valuable un-worked deposits from permanent development that would prevent or hinder their future extraction and requests that appropriate control measures should be put in place to avoid such a scenario.</p>	<p>unworked deposits for future extraction. It is considered that the Draft Plan should contain an objective to safeguard future extraction for those quarries which are authorised.</p> <p><b>CE Recommendation</b></p> <p>Insert a new objective under Policy EDE25: Quarries and Mineral Extraction as follows:</p> <p><i>To ensure that where new development is proposed in close proximity to authorised quarries, consideration is given to the safeguarding of valuable unworked deposits for future extraction.</i></p>
<p>SD-C195-35 Department of Communications, Climate Action and Environment</p>	<p>Submission requests the local authority to consider including the following, which could be included as a condition of planning for future extractive industry planning permissions as deemed appropriate by the planning authority:</p> <ol style="list-style-type: none"> <li>1. Allowing access to quarry faces by appropriate scientists (upon request and with due regards to Health and Safety requirements) during quarrying to record significant new stratigraphies / relationships as they might become exposed and to establish if the quarry site is worthy of recognition post extraction and through aftercare/restoration planning.</li> <li>2. If deemed appropriate in (1) above, leaving a representative section of the quarry face at the end of the quarry life or inclusion of information panels to promote the geology to the public or develop tourism or educational resources if appropriate depending on the future use of the site. Natural exposures are few, or deeply weathered, this measure would permit on-going improvement of geological knowledge of the subsurface.</li> </ol>	<p><b>CE Response:</b></p> <p>The submission is noted and welcomed.</p> <p>The Council recognises the importance of protecting the County's geological heritage sites and includes relevant policy within the Draft Plan.</p> <p>Access to quarries is outside the scope of the County Development Plan. However, the Draft Plan includes EDE25 Objective 3 in relation to reinstatement and/or reuse where active use has ceased.</p> <p>Noting the Geoheritage Programme and the importance of the scoping stage for EIA in the planning process and the planned design of quarries, it is considered appropriate to include reference to the referenced guidelines which were a joint publication of GSI and the Concrete Federation, within the Draft Plan.</p> <p><b>CE Recommendation:</b></p>

	<p>The Geoheritage Programme tries to promote a partnership between geological heritage and active quarrying, with such measures as those outlined in the 'Geological Heritage Guidelines for the Extractive Industry'. This document, written in association with Irish Concrete Federation, acts as a comprehensive guide in the sustainable extraction of natural resources while preserving the geological heritage of Ireland.</p>	<p>Amend EDE25 Objective 1 to read:</p> <p>From</p> <p>To facilitate mineral extraction in suitable locations subject to the protection of amenity and environmental quality, including air quality and noise pollution</p> <p>To</p> <p>To facilitate mineral extraction in suitable locations subject to the protection of amenity and environmental quality, including air quality and noise pollution and having regard to the <b>Geological Heritage Guidelines for the Extractive Industry' (GSI and Concrete Federation of Ireland, 2008).</b></p>
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Seveso Sites		
Submission No.	Submission Summary	CE response and recommendation
<a href="#">SD-C195-130 BOC Gases</a>	<p>This submission looks for the following amendment to Policy EDE26 Objective 1:</p> <p>To have regard to the policy and approach of the Health and Safety Authority to the Control of Major Accident Hazards (COMAH) Risk-based Land-use Planning, HSA (2010) or any superseding documents where appropriate, in assessing planning applications and in preparing land use plans. <b>Prior to the submission of a planning application within the Seveso consultation zones, applicants should consult with the Seveso operator to understand its current operations, hazard inventory, processing, and handling activities.</b></p>	<p><b>CE Response:</b></p> <p>The Submission is noted and it is recognised that BOC Gases is a Seveso site.</p> <p>Section 9.9 sets out policy and objectives which relate directly to Seveso Sites. The Chemicals Act (Control of Major Accident Hazards involving Dangerous Substances) Regulations 2015 (<a href="#">S.I. No. 209 of 2015</a>) (the "COMAH Regulations"), implement the Seveso III Directive (2012/18/EU). The purpose of the COMAH Regulations is to lay down rules for the prevention of major accidents involving dangerous substances, and to seek to limit as far as possible the consequences for human health and the environment of such accidents, with the overall objective of providing a high level of protection in a consistent and effective</p>

		<p>manner. The Health and Safety Authority (HSA) are the responsible body for the enforcement of the regulations and, as a prescribed body, they set out the technical land use planning advice to Planning Authorities.</p> <p>Having regard to the role of the HSA and to their being a prescribed body to which relevant planning applications are referred, the revised wording is not appropriate.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
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**Maps**

<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation</b>
<a href="#">SD-C195-28 Partas</a>	<p>This submission is looking for the vacant patch of land adjacent to the Killinarden Enterprise Park (marked on map), be designated for the expansion to the existing Killinarden Enterprise Park to supplement the shortage of available local enterprise space.</p>	<p><b>CE Response:</b></p> <p>The issue raised in the submission is noted.</p> <p>Regarding the site in question, the land is currently zoned EE which can be developed and act as an expansion of the existing Killinarden Enterprise Park, once a planning application is submitted.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>



# Chapter 9: Energy

## Chapter 10: Energy

Energy Planning in South Dublin		
Submission No.	Submission Summary	CE response and recommendation
SD-C195-275 Eoin Ó Broin	This submission calls for the zoning of the Clonburris SDZ to be modified such that only district heating may be used for heating and hygiene hot water needs for the SDZ, given the benefits of district heating.	<p><b>CE Response:</b></p> <p>The submission is noted and acknowledged.</p> <p>Under section 169(9) of the Planning Acts, a planning scheme shall be deemed to form part of any development plan in force in the area of the scheme until the scheme is revoked, and any contrary provisions of the development plan shall be superseded.</p> <p>The process for amending SDZ schemes lies outside the Development Plan.</p> <p>Section 2.9.8 of the Planning Scheme and a key principle of the scheme is: <i>“To actively promote a range of low carbon/zero carbon and renewable energy opportunities at Clonburris, particularly solar PV, and demonstrate leadership in their development and realisation, from strategic site options to individual block level technologies, in accordance with the recommendations of the Clonburris Energy Masterplan;”</i></p> <p>The Clonburris energy masterplan was prepared with the draft planning scheme in 2016/2017. The energy masterplan found that it might be feasible for the higher density urban centres, but unlikely in the lower density parts of the SDZ. In lower density areas, the current building regulations requirements for energy efficiency in new buildings have gone beyond what was suggested in the Energy Masterplan at that time and will ensure that these areas are carbon efficient.</p> <p>The technical suitability and potential for implementation of district heating is to be further investigated as part of the energy planning</p>

		<p>for the scheme.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p>SD-C195-253 Wind Energy Ireland</p>	<p>This submission notes that when assessing landscape sensitivity and capacity across each Regional Assembly area, it will be possible to identify lands on the lower end of the landscape sensitivity scale across each region that can accommodate the necessary GWs (Global Wind Service), with the inclusion of a high level Landscape Character Assessment (LCA) welcomed in the CDP.</p> <p>This submission also states that by allocating a clear target per region will require the areas of least landscape sensitivity with the greatest capacity to be identified to ensure an average of 1.4GW of new wind energy can actually be delivered in each region by 2030 and ensure the national target of 4.2GW is also achieved.</p> <p>Figure 10.4 presents remaining areas where large wind energy projects may be viable has no targets for new wind energy specified.</p>	<p><b>CE Response:</b></p> <p>The submission is noted.</p> <p>The Wind Energy Strategy outlined in the Draft Plan was prepared for the current 2016 Development Plan. It is recognised that since that time the issue of climate change and renewable energy has become more urgent and national legislation has advanced.</p> <p>As it stands, no areas in South Dublin County have been identified as appropriate for large scale wind energy largely due to the sensitivity of the Dublin Mountains and environmental constraints.</p> <p>However, E8 Objective 2 has committed to a review of the current Wind Energy Strategy as follows:</p> <p><i>To review the current Wind Energy Strategy for the County during the lifetime of the Plan having regard to any updated Wind Energy Guidelines and the current South Dublin Wind Energy Strategy</i></p>
<p>SD-C195-181 Electricity Supply Board</p>	<p>This submission acknowledges the updated LCA accompanying the plan, which includes a Wind Energy Sensitivity and Capacity analyses. The submitter welcomes the high-level wind energy potential assessment for the County by Codema also.</p> <p>They suggest that assessing the CDP and Wind Energy Strategies of adjoining counties would strengthen the Draft Plan in terms of consistency across the region. A plan led approach, consistent with national guidance as committed to in the Draft Plan will enable South Dublin to examine the potential with regard to wind energy developments.</p>	<p>The review will provide the opportunity to take account of the matters raised in this submission.</p> <p>The suggestion of assessing wind energy strategies across adjoining counties to strengthen the Plan is welcomed. This can be carried out as part of the proposed review of the Wind Energy Strategy outlined in E8 Objective 2.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>

<p>SD-C195-181 Electricity Supply Board</p>	<p>This submission states that the Draft Plan must ensure that the long-term operational requirements of existing utilities are protected in line with policies mentioned in the NPF and RSES. The following policy objective should be included in either chapter 10 or 11, to ensure consistency with National and Regional policy:</p> <p>'Support the sustainable reinforcement and provision of new energy infrastructure by infrastructure providers, ensuring the energy needs of future population and economic expansion across south Dublin and the wider Region can be delivered in a sustainable and timely manner'.</p> <p>The submission also would support the introduction of an objective that would provide support for existing transmission routes to be protected from inappropriate development, with the following wording:</p> <p>'Protect existing infrastructure and strategic route corridors for energy networks from encroachment by development that might compromise the performance of the networks'.</p> <p>This submission also highlights that the requirement for renewables-enabling plant is not acknowledged in the Draft Plan, the inclusion of the following text should be included in the plan as an objective, given South Dublin has access to Gas Network:</p> <p>'It must also be recognised that natural gas, particularly renewable and indigenous gas, will contribute to have a role to play in the transition to a low carbon economy. As such, renewable energy developments may require support from such sources in times of high energy demand'.</p>	<p><b>CE Response:</b></p> <p>The submission is noted and acknowledged.</p> <p>The ESB has pointed to policies contained in the NPF and the RSES on Infrastructure which includes support for a safe, secure and reliable supply of electricity and the development of enhanced electricity networks as well as new transmission infrastructure projects. The RSES includes guiding principles for the facilitation in principle of the provision of energy networks in local authority development plans.</p> <p>The Council understands the need to protect and develop new and existing energy infrastructure in South Dublin and the wider Region to ensure the energy needs for the future population.</p> <p>As set out in the RSES, the main energy networks serving the Region are electricity and gas. The Department of Environment, Climate and Communications has indicated (June 2020) that natural gas meets over 30% of Ireland's energy needs and generates over 50% of the electricity that Ireland uses. While a transition away from fossil fuels is a key policy action in reducing climate impacts, maintaining security of supply of gas is stated to be a government priority. The use of renewable sources of gas (including biomethane and hydrogen produced from renewable sources) will have a key role to play in decarbonising the natural gas grid. This has been further clarified in the recently published Policy Statement on Security of Electricity Supply in which the government has approved:</p> <ul style="list-style-type: none"> <li>● the development of new conventional generation (including gas-fired and gasoil/distillate-fired generation) is a national priority and should be permitted and supported in order to ensure security of electricity supply and support the growth of renewable electricity generation and</li> <li>● for additional electricity transmission and distribution grid infrastructure, electricity interconnection and electricity storage to be permitted and developed in order to support the growth of</li> </ul>
<p>SD-C195-253 Wind Energy Ireland</p>	<p>This submission recommends that the inclusion of a policy in support of the development and expansion of the electricity transmission and distribution grid and facilitate the development of landing locations for offshore generated wind</p>	

<p>SD-C195-213 An Taisce</p>	<p>energy.</p> <p>Submission indicates there is no capacity for further expansion of the fossil gas network under national, EU and international climate policy. Fossil gas must be phased out of our energy mix as rapidly as possible if we are to reach our Paris Agreement targets to keep warming under 1.5C. Further expansion of gas networks also risks that infrastructure becoming “stranded assets” as Ireland makes the required transition away from fossil fuels.</p>	<p>renewable energy and to support security of electricity supply</p> <p>And that</p> <ul style="list-style-type: none"> <li>• it is appropriate for additional natural gas transmission and distribution grid infrastructure to be permitted and developed in order to support security of electricity supply.</li> </ul> <p>While the contents of the submission relating to the Paris Agreement and climate change is acknowledged, it is considered that, given the context set out above, the Draft Plan should be amended in Chapter 11 Infrastructure to provide for a new section 11.6 relating to electricity infrastructure with associated policy and objectives.</p> <p><b>CE Recommendation:</b></p> <p>Insert a new Section 11.5 Electricity Infrastructure into Chapter 11 with associated policy and objectives and renumber the following sections, policy and objectives accordingly</p> <p><b>Section 11.5 Electricity Infrastructure</b></p> <p>In line with government policy, the development of energy networks in a safe and secure way to meet projected demand levels and to ensure a long-term, sustainable and competitive energy future for Ireland will be critical to our economy and to enabling the relevant grid connections for renewable energy. The protection of existing networks as well as expansion, where necessary, will enable energy service providers to deliver their statutory function. It is recognised that natural gas, particularly renewable and indigenous gas, will have a role to play in the transition to a low carbon economy. As such, renewable energy developments may require support from such sources in times of high energy demand'</p> <p><b>Policy IE6</b></p> <p>Protect the existing electricity infrastructure and support the development of a safe, secure and reliable supply of electricity and</p>
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		<p>the development of enhanced electricity networks as well as new transmission infrastructure projects subject to the relevant environmental assessments</p> <p><b>IE6 Objective 1</b> To support roll-out of the Smart Grids and Smart Cities Action Plan enabling new connections, grid balancing, energy management and micro grid development in line with RPO 10.19.</p> <p><b>IE6 Objective 2</b> To support the reinforcement and strengthening of the electricity transmission and distribution network to facilitate planned growth and transmission/distribution of a renewable energy focused generation in line with RPO 10.22</p> <p><b>IE Objective 3</b> To support the sustainable development of Ireland’s offshore renewable energy resources in accordance with the Department of Communications, Energy and Natural Resources ‘Offshore Renewable Energy Development Plan’ and any successor thereof including any associated domestic and international grid connection enhancements in line with RPO 10.24</p> <p><b>IE Objective 4</b> To ensure that the design of energy networks achieves the least possible environmental impact and that where such impacts are inevitable, they are mitigated to the greatest possible extent.</p> <p><b>IE6 Objective 5:</b> To protect existing infrastructure and strategic route corridors, where they have gone through appropriate social, environmental and cultural impact assessment, for identified energy networks from encroachment by development that might compromise the performance of the networks.</p>
SD-C195-181 Electricity Supply Board	This submission acknowledges that the lands on the South Dublin side of the Leixlip Station are zoned Objective HA (LV, DV, DM), however access to the facility should be	<p><b>CE Response:</b></p> <p>The contents of the submission are noted.</p>

	discouraged in the interest of public safety. The need for curtilage management and for the restriction of land uses around the Leixlip Station is critical to maintain the ability for ESB consolidation and/or expansion as well as access, monitoring and maintenance to the station.	Local access and curtilage management are operational matters for the operator. On the restriction of land uses, as noted in the submission, the lands are zoned HA-LV and the zoning is very restrictive by its nature. Should development be proposed it will be subject to assessment and public consultation under the development management process. Furthermore, policies and objectives recommended for inclusion in Chapter 11 will provide for the protection of existing infrastructure.  <b>CE Recommendation:</b>  No change to the Draft Plan.
SD-C195-181 Electricity Supply Board	<p>This submission makes the point that solar projects will play a critical role in diversifying our renewable generation portfolio for the period out to 2030, highlighting that solar farms have potential to be built on agricultural land whilst also accommodating the continued use of the land for grazing or for incorporating biodiversity measures.</p> <p>It also highlights that overall guidance on solar developments could be strengthened with the provision for extension of duration of permission due to solar developments often taking more than 5 years to be completed.</p> <p>The lifetime of solar developments is extending with most technologies now suitable for a minimum of 30 years operation, with investments decisions being made on lifetimes of up to 40 years. They request that permissions are granted with a lifetime up to a maximum of 40 years, with concerns regarding deterioration of infrastructure can be addressed by the lodgment of a financial security in the form of a bond and the require to provide a decommissioning plan.</p>	<p><b>CE Response:</b></p> <p>The submission is noted and acknowledged.</p> <p>Section 10.2.6 Solar PV and Policy E7 and its objectives highlight the promotion of solar energy infrastructure within South Dublin County.</p> <p>Regarding the provision of changes to extension of duration and or granting permissions with a lifetime of 40 years, this is not an issue for the County Development Plan. Action on this would require changes to the Planning and Development Act 2000 (as amended). It is also noted that to date there are no planning guidelines on Solar Farms.</p> <p>Notwithstanding, policy and objective in the Draft Plan support the provision of solar farms in principle.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
SD-C195-181 Electricity Supply Board	This submission states that further consideration should be given to both battery storage and hydrogen energy into policies in the final Plan. These include Battery Energy	<b>CE Response:</b>

	<p>Storage Systems (BESS) and Green Hydrogen, which is produced from renewable energy sources, offers potential for larger scale seasonal storage of variable renewable energy.</p>	<p>This submission is noted.</p> <p>As identified in the Climate Action Plan 2021, green hydrogen has been identified as having the potential to support decarbonisation across several sectors, in particular, in high-temperature heat for industry and in electricity generation.</p> <p>The Climate Action Plan describes green hydrogen as ‘a renewable fuel of non-biological origin, which has been identified as having potential to support decarbonisation energy production, across home heating, industry and transport’. Green hydrogen at present is seen as an alternative for transport fuels in Ireland, with further research to take place on this matter.</p> <p>Battery Storage is not currently mentioned in the Climate Action Plan.</p> <p>Both forms of renewable energy resources will be looked at and assessed once a review of the South Dublin Climate Action Plan takes place.</p> <p>Overarching policy in the Draft Plan supports renewable energy and this, alongside related policy, is considered sufficient to cater for an assessment of developments for new technologies as they progress.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p><a href="#">SD-C195-54 Transport Infrastructure Ireland</a></p>	<p>The submission welcomes the ambition of SDCC to continue to make every effort to increase energy efficiency and unlock renewable energy potential in the County and appreciates that the availability of a safe, secure and reliable supply of electricity is an essential requirement for Ireland’s current and future economic wellbeing.</p> <p>The submission suggests consideration on the addition of an objective included in the adopted Plan in relation to</p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted.</p> <p>It is considered that various routing options would need to be examined in any detailed feasibility and design study of new grid connections. Options studies would be required as part of any EIA where that is applicable. While the issue raised in the submission is noted, it is considered that it would not be appropriate to have an</p>



	renewable energy and in relation to safeguarding the national road network, indicating that grid connection routing options should be developed to safeguard the strategic function of the national road network in accordance with Government policy by utilising available alternatives. As well, it is suggested that planning applications with extensive solar panel infrastructure in the vicinity of the Luas and National Road should be accompanied by glint and glare assessments.	<p>additional objective on this matter and it is considered that SM6 Objective 4 of the Draft Plan sufficiently provides for safeguarding of national roads and associated junctions.</p> <p>The need for glint and glare assessments is provided for in the Draft Plan under section 13.10.4 where rail lines are specifically mentioned.</p> <p>It is considered that the matters raised are already provided for within the policy and objectives within the Draft Plan.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
SD-C195-269 John O'Leary	Improvement in the level of trees in the county to help mitigate Climate Change is needed	<p><b>CE Response:</b></p> <p>The issue raised in the submission is noted.</p> <p>The Draft Plan contains policy to improve the level of tree cover in the County. Figure 4.1 provides a map of tree canopy cover within the County which is supported by GI5 Objective 6 which states:</p> <p>To provide more tree cover across the county, in particular to areas that are lacking trees.</p> <p>It is considered that the Draft Plan contains policy and objectives to improve the level of tree cover in the County.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>

Energy Measures		
Submission No.	Submission Summary	CE response and recommendation
SD-C195-19 Knocklyon	Submission calls for increased usage especially on large	<b>CE Response:</b>

<p>Network</p>	<p>commercial and public buildings of solar panels on roofs, green planting of roof tops and consideration of Wind turbines where appropriate to reduce energy, waste, and encourage a more sustainable circular economy.</p> <p>Submission calls for the Council to retrofit energy wise all Council properties to bring them to at least B level BER.</p>	<p>The contents of the submission are noted.</p> <p>The vision of the Energy chapter within the Draft Plan is 'to deliver a green society and circular economy adaptable to new technologies, a home and place of employment for people and industries striving towards reducing their carbon footprint'.</p> <p>The Draft Plan has set policies and objectives to improve the energy mix within the County, to reduce energy needs and encourage a more sustainable circular economy.</p> <p>E7 Objective 8 supports the installation of solar panels on up to 100% of roof space. E7 Objective 1 encourages and supports the use of on-site solar energy use while E7 Objective 3 supports the ongoing delivery of solar technology on Council owned buildings and sites.</p> <p>Green roofs are supported in policy in the Green Infrastructure chapter. Small scale wind energy projects are covered within section 10.2.8 of the Draft Plan.</p> <p>H2 Objective 1 looks to maximise the use of existing housing stock, prioritising Council voids, facilitating and promoting upgrade/retrofit of existing stock reducing energy demand and addressing Climate Change in line with the Energy, Efficiency and Retrofitting Programme 2021-2030 (or any superseding document).</p> <p>In the last decade South Dublin County Council has adopted a proactive approach to addressing the climate change and energy challenge by delivering substantial energy efficiencies in its own building and vehicle stock, which has included the carrying out of an extensive retrofitting programme on its own social housing and public building stock and taking the lead role in identifying low carbon and renewable energy opportunities in the County.</p> <p><b>CE Recommendation:</b></p>
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		No change to the Draft Plan.
SD-C195-23 Gary Tyrrell	This submission looks for both PV's and Micro wind installations throughout the county as part of the local energy mix.	<p><b>CE Response:</b></p> <p>The submission is noted.</p> <p>Both Solar PVs (Section 10.2.6) and Micro wind installations (Section 10.2.8) are seen as important aspects of the local energy mix within South Dublin, once they do not negatively impact upon the environmental quality and visual or residential amenities of the area.</p> <p>They are provided for in the Draft Plan under E7 Objective 8 which supports the installation of solar panels on up to 100% of roof space. E7 Objective 1 encourages and supports the use of on-site solar energy use while E7 Objective 3 supports the ongoing delivery of solar technology on Council owned buildings and sites.</p> <p>Small scale wind energy projects are covered within section 10.2.8 of the Draft Plan.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
SD-C195-281 Dublin Friends of the Earth	<p>This submission states the meaning of embodied carbon (emissions associated with all the activities of procuring, mining, harvesting raw materials, transforming these materials into construction products, transporting them to site and incorporating them into a building, and subsequently maintaining, replacing and removing and disposing at the end of their life).</p> <p>It goes on to point out that Ireland currently has no legislation on embodied carbon and that the CDP mentions this in the CDP, with the hope that in 5 years time new legislation will be</p>	<p><b>CE Response:</b></p> <p>This submission is noted and acknowledged. The Draft Plan is committed under E3 Objective 2 to prioritising the retrofitting of buildings over demolition and reconstruction where possible to reduce the large quantities of embodied carbon energy generated from building materials when building from the ground up.</p> <p>In addition, the Draft Plan contains a range of policies, objectives and guidance which promotes and supports thermal upgrading and energy efficiency in new and existing buildings such as Policy NCBH26, NCBH26 Objective 3, Policy QDP11, H7 Objective 2,</p>

	<p>included on this matter.</p>	<p>Policy E3 and E3 Objectives 1-4.</p> <p>With regard to embodied carbon and legislation around same, it is noted that in the recently published Climate Action Plan 2021 Securing Our Future, in Section 13.3.7 Promoting Low Carbon Construction, it sets out the following Action:</p> <p>‘Develop a framework methodology and certification scheme for products, as an essential step towards implementing a performance-based approach on a phased basis for measuring and limiting the embodied carbon emissions of building projects and construction products’.</p> <p>However, this is currently outside the remit of the County Development Plan.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p>SD-C195-113 CAIRN Plc</p> <p>SD-C195-133 CAIRN Plc</p>	<p>The submission welcomes the possibility of utilising low carbon District Heating Networks (DHN) within the Clonburris SDZ where appropriate but raises concerns around implementation and viability. Th submission suggests that it is unlikely that any DHS would be available in time to serve the early phases of the scheme The submission suggests that the use of a district heating network for housing / low density areas of the SDZ is unlikely to be viable. In addition, it is submitted that SEAI approval/certification of a low carbon network would have to be secured before it could be used as a means of complying with Building Regulations Part L. Furthermore, the submission highlights that the co-ordination of utilities (ESB/Eir/Virgin/Irish Water/Drainage) in low density developments is already very challenging and the addition of a DHS network is likely to add to this congestion.</p>	<p><b>CE Response:</b></p> <p>ES SLO 1 looks to prioritise the development of low carbon district heating networks in the identified areas of potential for Low Carbon District Heating at Tallaght, Grange Castle/Clonburris and Clondalkin in line with Policy E5 and supporting objectives in the written statement.</p> <p>Under section 169(9) of the Planning Acts, a planning scheme shall be deemed to form part of any development plan in force in the area of the scheme until the scheme is revoked, and any contrary provisions of the development plan shall be superseded.</p> <p>The process for amending SDZ schemes lies outside the Development Plan.</p> <p>Section 2.9.8 of the Planning Scheme and a key principle of the scheme is: <i>“To actively promote a range of low carbon/zero carbon and renewable energy opportunities at Clonburris,</i></p>

		<p><i>particularly solar PV, and demonstrate leadership in their development and realisation, from strategic site options to individual block level technologies, in accordance with the recommendations of the Clonburris Energy Masterplan;”</i></p> <p>The Clonburris energy masterplan was prepared with the draft planning scheme in 2016/2017. The energy masterplan found that it might be feasible for the higher density urban centres, but unlikely in the lower density parts of the SDZ. In lower density areas, the current building regulations requirements for energy efficiency in new buildings have gone beyond what was suggested in the Energy Masterplan at that time and will ensure that these areas are carbon efficient.</p> <p>The technical suitability and potential for implementation of district heating is to be further investigated as part of the energy planning for the scheme</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
SD-C195-213 An Taisce	<p>The An Taisce submission welcomes the Draft Plan’s consideration of the current energy mix in the County and the need to rapidly shift away from fossil fuel based sources. We also welcome the commitments to renewable energy development of various types and scales across South Dublin and well as the many policy objectives supporting and facilitating this with regard to ecological constraints, heritage considerations, landscape, local amenity, etc</p>	<p><b>CE Response:</b></p> <p>The comments from An Taisce supporting the Draft Plan’s consideration on energy mix and commitments to renewable energy development are acknowledged and welcomed.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
SD-C195-163 Gas Networks Ireland	<p>This submission is supportive of policy objectives used within the Draft CDP, highlighting the GNI is involved in facilitating the injection of renewable gas as a carbon neutral energy source, supporting the circular economy, improving security of energy supply and helps diversify energy sources. Anaerobic Digestion (AD) plants are also highlighted as they</p>	<p><b>CE Response:</b></p> <p>The submission is noted and the support for policies in the Draft Plan are welcomed.</p> <p>Anaerobic Digestion is raised under Action no. 312 and 421 within the Climate Action Plan 2021, contributing towards the production</p>

	<p>can utilise a wide variety of feedstocks ranging from food wastes, to animal slurries and specifically grown energy crops such as grass silage. AD is a way of minimising wastes and contributing to the circular economy with the production of renewable gas.</p> <p>They also highlight that the gas network can play a part in transitioning domestic energy sources to renewable energy by using a combination of insulation, oil to gas changeover and solar PV installation to bring homes up to a BER B standard at a significantly lower cost than alternative deep retrofitting activities.</p>	<p>of renewable gas. The Draft Plan identifies anaerobic digestion as a way of generating energy from waste.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
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**Chapter 10 Miscellaneous**

<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation</b>
<a href="#">SD-C195-137 Declan Hanley</a>	<p>The submission states concerns over the lack of renewable energy sources and energy supplies to support the many new developments.</p>	<p><b>CE Response:</b></p> <p>The submission is noted.</p> <p>Policy E1 looks to promote an increase in energy efficiency and the growth of locally based energy alternatives in an environmentally acceptable and sustainable manner. This policy sets the tone for the energy chapter, where SDCC will aim to reduce its reliance on fossil fuels.</p> <p>E2 Objective 1 seeks to reduce the reliance on fossil fuels in the County by reducing the energy demand of existing and new development. In addition, as outlined in the SDCC Climate Change Action Plan, the County is participating in the Dublin Region Energy Master Plan with Codema, which is examining local energy sources, separate to the preparation of the Draft Plan.</p> <p><b>CE Recommendation:</b></p>

		No change to the Draft Plan.
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# **Chapter 10:**

## **Infrastructure and Environmental Services**



## Chapter 11: Infrastructure and Environmental Services

Water Supply and Wastewater		
Submission No.	Submission Summary	CE response and recommendation
SD-C195-213 An Taisce	<p>An Taisce submission requests that The Plan should include a requirement for all development proposals to demonstrate full compliance with the WFD, Groundwater Directive and River Basin Management Plans and notes that this will be one of the most crucial challenges for the new Plan.</p> <p>All new development requiring significant new water supplies should be assessed against up-to-date climate projections with regard to the likelihood of future water shortages as a result of changing rainfall patterns.</p> <p>The submission also notes that wastewater treatment capacity in the GDA is already under significant pressure developments that require additional public wastewater treatment capacity must be deemed premature until such capacity is in place.</p>	<p><b>CE Response</b></p> <p>The submission is noted. The issues raised are addressed in the Draft Plan as set out below:</p> <p>In respect of the Water Framework Directive (WFD), the Groundwater Directive and River Basin Management Plans, Policy IE3 Surface Water and Groundwater and Policy IE4:Flood Risk are contained within the Draft Plan provide the relevant policy and objectives.</p> <p><b>Policy IE3 -</b> Manage surface water and protect and enhance ground and surface water quality to meet the requirements of the EU Water Framework Directive.</p> <p><b>IE 3 Objective 1 -</b> To maintain, improve and enhance the environmental and ecological quality of our surface waters and groundwater by implementing the relevant programme off measures set out in the River Basin Management Plans.</p> <p><b>IE3 Objective 3 -</b> To protect the regionally and locally important aquifers within the County from risk of pollution</p> <p><b>Policy IE4 -</b> Ensure the continued incorporation of Flood Risk Management into the spatial planning of the County, to meet the requirements of the EU Floods Directive and the EU Water Framework Directive and to promote a climate resilient County.</p> <p><b>IE2 Objective 5</b> also applies in relation to the reduction of pollution to surface water outflows.</p>

		<p>All water and wastewater issues related to new development is now the remit of Irish Water. The Draft Plan includes objectives requiring SDCC work in conjunction with Irish Water to ensure the needs of the County are met and to support them in a number of projects including the Regional Water Supply Project.</p> <p><b>IE2 Objective 1:</b></p> <p>To work in conjunction with Irish Water to protect existing water and drainage infrastructure and to promote the ongoing upgrade and expansion of water supply and wastewater services to meet the future needs of the County and the Region.</p> <p><b>IE2 Objective 8:</b></p> <p>To ensure on-going liaison and consultation with Irish Water to ensure that the water services infrastructure for the planned growth of the County, in line with the County’s Core Strategy, is integrated into the relevant plans and capital programmes and to ensure that the design and layout of water services is fully considered to deliver sustainable growth.</p> <p>In relation to wastewater, the Draft Plan sets out objectives to support Irish Water in the delivery of strategic water and wastewater projects. It is noted that the Ringsend WWTP upgrade is underway by Irish Water and they have indicated in their submission that this is due for completion in 2025.</p> <p><b>IE2 Objective 4:</b></p> <p>To support Irish Water in the delivery of the strategic objectives and strategic water and wastewater projects and infrastructure as set out in the Water Services Strategic Plan (2015), any subsequent plan, Irish Water’s Capital Investment Plan 2020 – 2024, any subsequent Capital Investment Plans and the forthcoming National Water Resources Plan.</p> <p><b>CE Recommendation</b></p>
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		No change to Draft Plan
SD-C195-109 South Dublin Conservation Society	A submission calls for Policy IE2 to include a new objective to increase the use of rainwater harvesting and storage systems in larger developments.	<p><b>CE Response:</b></p> <p>The issue raised in this submission is addressed by IE 2 Objective 7 which provides for the promotion of water conservation and best practice in water conservation in all developments.</p> <p>IE2 Objective 7:</p> <p>To promote water conservation and best practice water conservation in all developments, including rainwater harvesting, grey water recycling and supporting the implementation of BS8515:2009 Rainwater harvesting systems - Code of practice.</p> <p><b>CE Recommendation</b></p> <p>No change to Draft Plan</p>
SD-C195-99 Irish Water	<p>Irish Water (IW) welcomes the inclusion of many objectives in Chapter 11 of the Draft CDP that will support the delivery of IW plans, programmes and policies noting that they will ensure the sustainable management of water and wastewater in line with national and regional objectives as stated in the National and Regional Plans.</p> <p>The submission provides updates on Irish Water's plans and programmes. This includes their Investment Plan 2020-2024 which it is stated is being continually revised. Their National Water Resources Plan (NWRP) is being developed as the strategic water services plan for the next 25 years and will outline how Irish Water intends to maintain the balance between the supply from water sources around the country and demand for drinking water over the short, medium and long term. The NWRP includes a review of all Water Resource Zones (WRZs) in the country to determine projects to resolve deficits on a nationwide scale.</p>	<p><b>CE Response:</b></p> <p>The contents of the submission and the various updates are noted. The importance of continuing to work with Irish Water to ensure that water supply and wastewater infrastructure is sufficient to meet the growing needs of the population and to promote ongoing upgrade and expansion works of water supply and wastewater services is recognised and reflected in policy and objectives in the Draft Plan which have been welcomed by Irish Water.</p> <p>The Irish Water submission notes their policy in relation to facilitating connections to existing infrastructure, where capacity exists, with a presumption that development will be focused into these areas that are serviced by public water supply and wastewater collection networks. This approach is complemented by the compact growth approach taken by the Draft Plan and is welcomed.</p> <p>The Draft Plan contains a number of policies and objective which will facilitate the removal of surface water inflows to the wastewater</p>

	<p>IW highlight that it is their policy to facilitate connections to existing infrastructure, where capacity exists, in order to maximise the use of existing infrastructure and reduce additional investment costs. In this regard, there is a general presumption that development will be focused into areas that are serviced by public water supply and wastewater collection networks. Alternative solutions such as private wells or waste water treatment plants should not generally be considered by planning authorities. In addition, Irish Water highlight that they will not retrospectively take over responsibility for developer provided treatment facilities or associated networks, unless agreed in advance.</p> <p>IW indicate in their submission that the major upgrade programme of works at Ringsend Waste Water Treatment Plant is being delivered on a phased basis, and when works are complete in 2025, Ringsend will have the capacity to treat the waste water for a population equivalent of 2.4 million while achieving the standards of the Urban Waste Water Treatment Directive.</p> <p>It is stated that a planning application (SID) for the Greater Dublin Drainage Project, a regional waste water treatment plant has been resubmitted to An Bord Pleanála following the quashing of an earlier applicaiton. It is emphasised in the submission that the project's strategic importance remains unchanged.</p> <p>Drainage Area Plans are being progressed for the wastewater networks in South Dublin. These studies will model the existing sewer network / future scenarios and develop solutions to overcome the current constraints.</p> <ul style="list-style-type: none"> <li>• Dodder Valley DAP - Ongoing</li> <li>• City Centre DAP - Ongoing</li> </ul>	<p>system through the use of SuDS and Green Infrastructure approaches. These are contained in Chapters 4 Green Infrastructure and Chapter 11 Infrastructure with supporting implementation policy in Chapter 13. and are Other issues are operational matters for Irish Water.</p> <p>There is no objection to the replacement of Figure 11.0 of the Draft Plan which set of a high-level schematic for the Water Supply Project with the illustration provided by IW.</p> <p>In respect of the Irish Water request to rephrase the IE Objective 2, from “The Eastern and Midlands Region Water Supply Project” to “The Water Supply Project Eastern and Midlands Region”. There is no objection to the proposed rephrasing.</p> <p><b>CE Recommendation:</b></p> <p>Amend the Draft Plan as follows</p> <ol style="list-style-type: none"> <li>1. Replace Figure 11.0 with map provided within the Irish Water of the illustration taken from the Final Options Appraisal Report (2016). (See Appendix 6 of this report)</li> <li>2. Amended the bullet point within the wording of IE Objective 2 to replace ‘The Eastern and Midlands Region Water Supply’ with the revised name ‘The Water Supply Project Eastern and Midlands Region’</li> </ol>
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	<ul style="list-style-type: none"> <li>• Nass Road Lands - Strategic Study commenced</li> </ul> <p>Irish Water strongly encourages the removal (or significant reduction, if full removal is not feasible), of surface water inflows to the waste water system. In order to support this objective, Irish Water encourages the inclusion of policies and objectives on the use of Sustainable Urban Drainage Systems and Green Infrastructure in both existing and new development areas.</p> <p>In respect to the Water Supply Project (WSP, IW in their submission indicate that this project continues to be the preferred approach for the Eastern and Midlands Region to deliver a 'new source' water supply but will require review and confirmation in light of the NWRP and associated statutory consultations and SEAs. The submission refers to Figure 11.0 of the Draft Plan which set out a high level schematic for the WSP. IW respectfully suggest that this illustration be replaced with a new map (as provided by IW in their submission) showing a high level schematic that illustrate the route from Parteen to Peamount with referencing specific design aspect that may be subject to change.</p> <p>IW welcome Policy IE2 of the Draft Development Plan and its associated objectives. With respect to the IE Objective 2, IW suggest that the first bullet be rephrased from "The Eastern and Midlands Region Water Supply Project" to "The Water Supply Project Eastern and Midlands Region".</p>	
SD-C195-225 An Cláomh Glas	The submission considers that all housing and development decisions must take the availability of sewage infrastructure into account	<p><b>CE Response:</b></p> <p>Since 1<sup>st</sup> January Irish Water is the statutory body for water services, this includes wastewater. Planning applications are assessed having regard to recommendations made by Irish Water. However, the matter of wastewater and water connections is one for Irish Water and the developer and the requirement for</p>

		<p>connection agreements are conditioned through planning permissions.</p> <p><b>CE Recommendation</b></p> <p>No change to Draft Plan</p>
<p>SD-C195-154 Tallaght Community Council</p>	<p>The submission questions whether the present and future Water supply for the planned and permitted developments in Cookstown / Airtown and Broomhill are tested and verified as being adequate and future proofed to support the existing approved pipeline and the intensification of residential and commercial uses. As such the submission provides details on a recent IW supply disruption report as there is concerns over the Tallaght LAP with regards to the quality and reliability of water supply in the long term and assurances of such is requested.</p>	<p><b>CE Response:</b></p> <p>The issues raised are noted. All water and wastewater issues relating to new development falls within the remit of Irish Water. The Draft Plan includes objectives requiring the Council to work in conjunction with Irish Water to ensure the needs of the County are met. Such objectives include:</p> <p><i>IE2 Objective 1:</i></p> <p><i>To work in conjunction with Irish Water to protect existing water and drainage infrastructure and to promote the ongoing upgrade and expansion of water supply and wastewater services to meet the future needs of the County and the Region.</i></p> <p><i>IE2 Objective 8:</i></p> <p><i>To ensure on-going liaison and consultation with Irish Water to ensure that the water services infrastructure for the planned growth of the County, in line with the County's Core Strategy, is integrated into the relevant plans and capital programmes and to ensure that the design and layout of water services is fully considered to deliver sustainable growth.</i></p> <p><i>IE2 Objective 4:</i></p> <p><i>To support Irish Water in the delivery of the strategic objectives and strategic water and wastewater projects and infrastructure as set out in the Water Services Strategic Plan (2015), any subsequent plan, Irish Water's Capital Investment Plan 2020 – 2024, any subsequent Capital Investment Plans and the forthcoming National Water Resources Plan.</i></p>

		<p>It is noted that all planning applications are referred to Irish Water for assessment. South Dublin County Council will continue to work with Irish Water in order to ensure a quality and reliable water supply is provided throughout the County.</p> <p><b>CE Recommendation</b></p> <p>No change to Draft Plan</p>
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<b>Surface Water and Groundwater</b>		
<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation</b>
SD-C195-294 Brother Nicholas Smith	The submission from the Marist Brothers of Moyle Park College supports the 'Friends of the Camac' submission for SDCC to clean up the Pond adjacent to their property and request that the Council consult with the Brothers before commencing the work. The submission further highlights that the 'Filter Pond' (next to St. John's Wood) has become unsightly with scum during the summer months as direct result of the Council's action in lowering the level of water and restricting the flow through the whole system.	<p><b>CE Response:</b></p> <p>The Draft Plan includes an objective to support and facilitate the delivery of the flood alleviation scheme for the Camac. This scheme is currently being prepared in conjunction with Dublin City Council. Issues around cleaning up the pond adjacent to Moyle Park are operational ones and are not a matter for the Draft Plan which is a strategic land use document.</p> <p><b>CE Recommendation</b></p> <p>No change to Draft Plan</p>
SD-C195-299 James McInerney	<p>The submission notes that SDCC are aware of flooding problems in Newcastle, in particular to flooding of lands at the Old Glebe, Main Street, which is a protected structure. The flooding arises from two sources:</p> <p>(i) Surface water and groundwater entering the fresh water supply to the ornamental fish pond; and</p> <p>(ii) The discharge of surface water and groundwater from new developments into an open ditch at the rear of the Old</p>	<p><b>CE Response:</b></p> <p>The issues raised in the submission are noted. The Council has been in contact with the owner of the Glebe House and his consultants. A CCTV survey has been carried out and the Council is in the process of carrying out root cutting and lining work to the network in the vicinity of his property.</p>

	<p>Glebe, resulting In the overflow from the ornamental pond being backed up in heavy rainfall.</p> <p>The submission highlights that SDCC are approaching this issue with short, medium and long term solutions which Is not considered satisfactory. The submission contends that it appears that no proper solution will be put in place until such time as the proposed commissioning consultants to be engaged to carry out an assessment of the management of surface water and groundwater in Newcastle, have reported. The submission notes that this was to be done In 2020 and has not been done to date. The submission highlights that planning permissions are continuing to be granted which may impact on The Old Glebe.</p> <p>The submission notes that SDCC as an Interim solution in the immediate past required developer to provide underground attenuation tanks, which was contrary Chapter 7, IE Objective 5 of Infrastructure &amp; Environment Quality (IE) Polley 2 Surface Water &amp; Groundwater of current Development Plan. The submission notes that this objective is now proposed in Chapter 11 Infrastructure and Environment Services of the Draft Development to read as IE3 Objective 2 to read 'To maintain and enhance existing surface water drainage systems In the County and to require Sustainable urban Drainage Systems (SuDS) In new development in accordance with objectives set out In section 4.3.2 of this Plan Including, where feasible, integrated constructed wetlands, at a local, district and County level, to control surface water outfall and protect water quality.'</p> <p>The submission proposes that the words "avoid the use of underground attenuation and storage tanks" be added of the new Objective and that a SLO Objective be added as follows:</p>	<p>The study referred to has been tendered and it is expected that a consultant will be appointed shortly.</p> <p>This is a matter which is being dealt with at an operational level. It is considered that there is sufficient strategic policy in the Draft Plan within section 11.3 on Flood Risk Management including IE4 Objective 1:</p> <p>To require site specific flood risk assessments to be undertaken for all new developments within the County in accordance with The Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009) and the requirements of DECLG Circular P12/2014 and the EU Floods Directive.</p> <p>And IE4 Objective 2:</p> <p>To require all developments in the County to be designed and constructed in accordance with the "Precautionary Principle" detailed in the OPW Guidelines.</p> <p>The submission request an amendment to IE3 Objective 2 to include 'avoid the use of underground attenuation and storage tanks'. The objective currently states:</p> <p><i>To maintain and enhance existing surface water drainage systems in the County and to require Sustainable urban Drainage Systems (SuDS) in new development in accordance with objectives set out in section 4.3.2 of this Plan including, where feasible, integrated constructed wetlands, at a local, district and County level, to control surface water outfall and protect water quality.</i></p> <p>As referenced in the objective, section 4.3.2 contains a number of objectives on SuDS including GI4 Objective 1</p> <p><i>To limit surface water run-off from new developments through the use of Sustainable Urban Drainage Systems (SuDS) using surface water and nature based solutions and ensure that SuDS is integrated into all new development in the County and designed in accordance with South Dublin County Council's Sustainable Drainage Systems (SuDS) Explanatory, Design and Evaluation Guide.</i></p>
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	<p>'No further surface water and ground water will be allowed discharge into the existing culvert at the rear of The Old Glebe Newcastle until such time as a long-term solution has been Implemented following the recommendations of the report into the management of surface water and ground water in Newcastle.'</p> <p>In the event, that the above amendments are not acceptable to SDCC, the submission requests that at least the new Development Plan recognises the current issues that affect The Old Glebe and that appropriate objectives be inserted so that new developments In the area do not contribute to flooding and pollution of the Ornamental Fish Pond. The submission argues that attenuation tanks are not the solution and therefore SDCC should not permit them and should require developers to provide more sustainable urban solutions.</p>	<p>Having regard to the existing objectives in the Draft Plan and the forthcoming SDCC SuDS Guidance referenced in GI4 Objective 1, it is considered that there is no requirement for the proposed wording as the existing objectives are sufficient as worded.</p> <p><b>CE Recommendation</b></p> <p>No change to the Draft Plan</p>
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<b>Flood Risk Management</b>		
<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation</b>
<p>SD-C195-33 Office of Public Works</p> <p>SD-C195-225 An Claiomh Glas</p>	<p>This submission welcomes IE4 Objective 4, recommending that the text in this objective be clarified with Flood Alleviation Schemes in section 3.3.2 of the SFRA, to ensure zoning or development proposals support and do not impede or prevent the progression of these measures.</p> <p>A scheme planned for Lucan to Chapelizod is also mentioned, which will be delivered in the second tranche of schemes.</p> <p>An Claiomh Glas (Environmental NGO) are supportive of the submission from the OPW</p>	<p><b>CE Response:</b></p> <p>The issue raised in the submission is noted. IE4 Objective 4 states:</p> <p><i>To support and facilitate the delivery of flood alleviation schemes in South Dublin County, including the following schemes:</i></p> <ul style="list-style-type: none"> <li>àà Poddle Flood Alleviation Scheme.</li> <li>àà Camac Flood Alleviation Scheme.</li> <li>àà Whitechurch Flood Alleviation Scheme.</li> </ul> <p>It is considered that the objective should be amended as suggested by the OPW to clarify that zoning or development</p>

		<p>proposals do not impede or prevent the progression of these measures and to add the Lucan to Chapelizod scheme.</p> <p><b>CE Recommendation</b></p> <p>Amend IE4 Objective 4 to read:</p> <p>To support and facilitate the delivery of flood alleviation schemes in South Dublin County, <b>including the schemes listed, and to ensure that zoning or development proposals do not impede or prevent the progression of these measures:</b></p> <ul style="list-style-type: none"> <li>➤ Poddle Flood Alleviation Scheme.</li> <li>➤ Camac Flood Alleviation Scheme.</li> <li>➤ Whitechurch Flood Alleviation Scheme</li> <li>➤ <b>Lucan to Chapelizod Flood Alleviation Scheme</b></li> </ul>
<p><a href="#">SD-C195-213 An Taisce</a></p>	<p>An Taisce welcomes the use of the High-End Future climate change scenario parameters in the Strategic Flood Risk Assessment. In respect of IE4 Objective 1 add requirement that site-specific flood risk assessments be required to use the most up-to-date climate projections and high-end risk scenarios.</p>	<p><b>CE Response:</b></p> <p>The issue raised is noted. IE4 Objective 1 states:</p> <p><i>To require site specific flood risk assessments to be undertaken for all new developments within the County in accordance with The Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009) and the requirements of DECLG Circular P12/2014 and the EU Floods Directive.</i></p> <p>The inclusion of EI4 Objective 2, which states:</p> <p><i>To require all developments in the County to be designed and constructed in accordance with the “Precautionary Principle” detailed in the OPW Guidelines</i></p> <p>Having regard to the Draft Plan containing this latter objective it is considered that the requirement to amend IE4 Objective 1 is not necessary. It is noted that both of these objectives have been welcomed by the OPW.</p>

		<p><b>CE Recommendation</b> No change to the Draft Plan</p>
<p>SD-C195-268 Brian Nolan</p>	<p>A submission was received from friends of the Camac outlining the history and specifications of the river. The 18th – 20th centuries mills, altered the course and structure of the river due to large weirs, artificial channel and barriers constructed which ultimately led to silting.</p> <p>Corkagh Park has 6 ponds, with capacity for 13,500 cubic metres of stormwater. In the 2000 flood relief plan it was intended to have 55,000 cubic metres storm attenuation capacity. Clondalkin Park has 4 ponds, desilted with capacity for 13,000 cubic metres. In combination these ponds will slow the flow sufficiently to prevent downstream urbanised flooding if desilted and will consequently assist in flood alleviation.</p> <p>The submission also note that Brittas Pond has huge potential as a floodwater detention pond for the Camac, which flows through it but hidden from view due to overgrown vegetation. The submission considers that the water flowing through the river basin is low and not visible from the banks and consequently it needs to be protected from development. Previous development of Swiftbrook in Saggart has impacted the tributaries of the Lisheen and that of the Camac which has cost the Camac 15% of its volume.</p> <p>The Fonthill Road Bridge arches are too low and the creation of a limited wetland area upstream of the Fonthill bridge would help to dissipate floodwater pressure.</p> <p>The submission goes on further to states that the drainage and flood attenuation at Citywest is inadequate and development in general is encroaching on the banks of the Camac tributaries and retrofitting for flood relief and</p>	<p><b>CE Response:</b></p> <p>The issue raised in the submission is noted. IE4 Objective 4 states:</p> <p><i>To support and facilitate the delivery of flood alleviation schemes in South Dublin County, including the following schemes:</i></p> <ul style="list-style-type: none"> <li>- <i>Poddle Flood Alleviation Scheme.</i></li> <li>- <i>Camac Flood Alleviation Scheme.</i></li> <li>- <i>Whitechurch Flood Alleviation Scheme.</i></li> </ul> <p>The Camac Flood Alleviation Scheme is currently at Stage 1 Scheme Development and Preliminary Design. In this Stage the project will look at establishing the flood risk within the catchment and develop a full understanding of the environment within the catchment. This will involve several surveys within the area and the construction of hydraulic computer models to identify the flooding. This will then allow the identification of possible flood alleviation options.</p> <p>The importance of the River Camac corridor for Green Infrastructure is identified within the draft Plan where a number of objectives are set out for Corridor 5: Camac River Corridor, These include addressing habitat quality issues, the daylighting of existing culverted sections and the support of the naturalisation of the Camac River as part of the emerging principles of the Naas Road Framework Plan.</p> <p>The Draft Plan provides for policy under GI3 on riparian corridors which were identified and mapped on foot of a hydromorphical study undertaken to inform the plan and is a key element for the protection of water quality.</p>

	<p>attenuation is essential.</p> <p>The submission further highlights that Local Authorities have extensive powers to engage in flood relief and the RBM-DOGGS Flood Simulation Model, used to determine the Camac catchment requirement as 55,000 cubic metres floodwater storage is required and only 13,000 has been provided.</p> <p>It is also highlighted that Citywest area is vulnerable to meteorology events that are increasing happening across Europe.</p> <p>Water Quality analysis was carried out in July 2021 at Kingswood/Fortunestown Tributary yielded a 'bad' result, Baldonnell Upper/Corbally and Baldonnell Little/Crooksling Tributaries and found both to be 'Poor Quality' and findings are that water quality of the Camac is deteriorating at an alarming rate. The submission considered that the pollution is from culverts, inadequate stormwater management, lack of riparian buffer corridors and total absence of SuDS.</p> <p>The submission recommends the council employ qualified personnel to certify (sign-off) compliance with the Water Framework Directive and River Basin Management Directive for the Camac River Catchment to include all outflows from developments to the Camac RC, Riparian Buffer Zones, Adequate attenuation ponds, retrofitting existing facilities to an adequate level, redirecting all misconnected properties to the foul sewerage system, retrofit Citywest and refuse future development on the Camac River Basin between Brittas. They also recommend using the Camac upstream ponds for flood alleviation.</p> <p>The Friend of the Camac submission is also accompanied by an 'Urban River Management' report highlighting the case</p>	<p>Policy IE3 of the Draft Plan sets out comprehensive policy and objectives on surface water and groundwater to ensure that the requirements of the EU Water Framework Directive are met.</p> <p>It is noted that the matter of staffing is not for the County Development Plan but IE3 Objective 7 provides for the protection of surface water quality by continuing to assess the impact of domestic and industrial misconnections and by implementing measures to address same.</p> <p>It is considered that the Draft Plan contains robust policy on rivers, habitats and surface water quality.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
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	study of the River Camac, a GPS survey 'altitude above sea level' from Knockannavea to Clondalkin Camac Mill Bridge, a two page extract from the Triturus Fisheries Action Plan and a one page extract from a Triturus Biodiversity Report 2019.	
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**Information and Communication Technology**

<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation</b>
<a href="#">SD-C195-181 Electricity Supply Board</a>	This submission encourages policies which are consistent with national guidance to allow for the improved development of telecommunications infrastructure, particularly broadband capability in the area of South Dublin.	<p><b>CE Response:</b></p> <p>The Chief Executive notes this submission.</p> <p>The Council have included IE5 Objective 1 to promote and facilitate the provision of appropriate telecommunications infrastructure, including broadband connectivity and other innovative and advancing technologies within the County in a non-intrusive manner.</p> <p>IE5 Objective 8 looks to investigate the potential for the provision of fibre optic cables in the County to facilitate the delivery of high-speed broadband and to work collaboratively with providers in facilitating the same.</p> <p>All policies within the Draft Development Plan are consistent with National guidance and will allow for the improved development of telecommunications infrastructure as highlight in Policy IE5 Information and communication Technology.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>

**Waste Management**

<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation</b>
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<p>SD-C195-11 Proinsias Mac Fhlannchadha</p>	<p>The word continue should be removed from IE6 Objective 6 which implies that there is already an extensive network of green waste centres when is not the case - "To continue to roll out a countywide network of green waste centres in suitable locations to expand the collection system for compostable waste."</p>	<p><b>CE Response:</b></p> <p>It is considered that the wording of IE6 Objective 6 is appropriate and should not be altered. It is noted that green waste is accepted at the Council owned civic amenity site in Ballymount, with Oxigen waste (also in Ballymount), also accepting green waste. There is also a leaf composting scheme which forms part of the Council's road sweeping contract.</p> <p>It is also noted that green waste can now be widely disposed of in the household organic waste or brown bin at a county wide level.</p> <p>However, it is recommended that the objective is amended to reflect the changing nature of green waste recycling.</p> <p><b>CE Recommendation:</b></p> <p>Amend IE6 Objective 6 from:</p> <p>To continue to roll out a countywide network of green waste centres in suitable locations to expand the collection system for compostable waste.</p> <p>To</p> <p>To ensure that green waste centres are provided in suitable locations to augment the local house to house collection systems for compostable waste.</p>
<p>SD-C195-11 Proinsias Mac Fhlannchadha</p>	<p>Submission calls for SDCC to consider a scheme similar to that which was rolled out in Cork in November last year where used paint is recycled and given to good causes as part of SDCC commitments to the Circular economy in line with IE6 Objective.</p> <p>Submission calls for SDCC to conduct a feasibility study and work with the appropriate SPC(s) to look at the setting up of at least one Library of Things and Repair Cafe in the county and/ or each local area in line with IE6 Objective 1.</p>	<p><b>CE Response:</b></p> <p>The Council is currently looking to set-up a paint reuse scheme from the Ballymount Civic Amenity site. The Rediscovery Centre would collect water-based waste paint from Ballymount, mix it and sell it through their eco-store. Currently the Council provides paint to communities through the Social Credits (Paint Enhancement) Scheme but once the paint reuse scheme is up and running there is no reason why some of that paint can't be redirected to local groups.</p>

	<p>There is also an opportunity to link in with groups such as the local Men Sheds organisations etc.</p>	<p>A Repair Café was held during Dublin Climate Action Week which featured bikes, furniture and fashion from the Rediscovery Centre, the national centre for the circular economy in Ireland. However, Repair Cafes are in a grey area for insurance which can present challenges, particularly for electronic items. The Council supports <a href="http://www.repairmystuff.ie">www.repairmystuff.ie</a> – a national directory website setup by LAs to support and promote the repair industry.</p> <p>The Draft Plan supports the circular economy through a number of objectives including EDE2 Objective 4:</p> <p><i>To support the measures in South Dublin’s Climate Change Action Plan (2019-2024), or any superseding plan, to integrate the Circular Economy approach with economic development initiatives, in order to optimise opportunities in design and operation to reduce energy and material consumption and recycling of materials in support of sustainable development.</i></p> <p><b>CE Recommendation</b></p> <p>No change to the Draft Plan</p>
<p><a href="#">SD-C195-19 Knocklyon Network</a></p>	<p>Submission calls for the Council to work with Repak to encourage the retailers to reduce packaging, to use only recyclable packaging and to make identification easier for the consumer, and to work with the government bodies to ensure that where internet shopping is involved there is a contribution towards the recycling of that packaging.</p> <p>Submission calls for an annual WEE collection in all estates.</p>	<p><b>CE Response:</b></p> <p>It is noted that the need for retailers to reduce packaging is one which will have to be addressed in the first instance by national and/or european legislation. The Council will fully support efforts to reduce waste and in this regard objective IE6 Objective 1 is included in the Draft Plan</p> <p><i>To encourage a just transition from a waste management economy to a green circular economy to enhance employment and increase the value, recovery and recirculation of resources through compliance with the provisions of the Waste Action Plan for a Circular Economy 2020 – 2025 and to promote the use of, but not limited to, reverse vending machines and deposit return schemes or similar to ensure a wider and varying ways of recycling.</i></p>

		<p>WEEE collections – The Council works with Recycle IT a South Dublin community based social enterprise specialising in recycling WEEE. Recycle IT offers collection services to residents for all types of pure metal and electrical, battery or solar powered equipment.</p> <p><b>CE Recommendation</b></p> <p>No change to the Draft Plan.</p>
SD-C195-11 Proinsias Mac Fhlannchadha	<p>The wording as per IE6 Objective 9 should be amended to remove the word "economically". The treatment of all waste is not economical but needs to be processed and managed accordingly regardless of the cost-effectiveness of same.</p> <p>"To support the development of indigenous capacity for the treatment of non-hazardous and hazardous wastes where technically, economically and environmentally practicable subject to the relevant environmental protection criteria for the planning and development of such activities being applied."</p>	<p><b>CE Response:</b></p> <p>In respect of the use of the word 'economically' in IE6 Objective 9 which states as follows:</p> <p>'To support the development of indigenous capacity for the treatment of non-hazardous and hazardous wastes where technically, economically and environmentally practicable subject to the relevant environmental protection criteria for the planning and development of such activities being applied.'</p> <p>The wording acknowledges that any procurement process for any infrastructure must take into account the costs of delivery of such infrastructure. The objective requires compliance with environmental protection criteria for the delivery of such infrastructure which includes the assessment of need for such facilities.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
SD-C195-11 Proinsias Mac Fhlannchadha	<p>The wording as per IE6 Objective 4 should be amended to include the provision of a number of "bring centres" as part of this development plan, which manages a number of waste streams that are required to the public at a smaller scale to a civic amenity sites. As things stand, there is 1 civic amenity site in Ballymount for the entire population.</p>	<p><b>CE Response:</b></p> <p>In respect of the provision of the detail of the number and type of waste facilities in the County the County Development Plan is a Strategic Landuse document. The detail of provision of particular waste management facilities or projects is an operational matter. It</p>



	<p>For context, DCC operate 8 smaller bring centres which include collecting a number of additional waste streams closer to the community, whilst SDCC has no facilities of a comparable nature.</p>	<p>is the role of the County Development Plan to support the delivery of such facilities. This is achieved through the wording of <b>IE 6 Objective 4 see also IE 6 Objective 3</b> amongst others.</p> <p>IE6 Objective 4:</p> <p><i>To provide for and maintain the network of bring infrastructure (e.g. civic amenity facilities, bring banks) in the County to facilitate the recycling and recovery of hazardous and non-hazardous municipal wastes.</i></p> <p>IE6 Objective 3:</p> <p><i>To provide for, promote and facilitate high quality sustainable waste recovery and disposal infrastructure/technology in keeping with the EU waste hierarchy and to adequately cater for a growing residential population and business sector.</i></p> <p>It is considered that the objectives in the Draft Plan provide for bring infrastructure.</p> <p><b>CE Recommendation</b></p> <p>No change to the Draft Plan</p>
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<b>Environmental Quality: Air, Noise, Light</b>		
<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation</b>
<a href="#">SD-C195-281 Dublin Friends of the Earth</a>	<p>This submission requests an increase in the number of air quality monitoring devices, especially at congestion blackspots.</p>	<p><b>CE Response:</b></p> <p>Air quality management is carried out under the provisions of the Air Pollution Act (1987). The air quality monitoring stations network is managed by the EPA, in partnership with Local Authorities and other public/semi-state bodies and universities.</p>

		<p>The Council has a number of air quality monitoring stations in the County managed by the Environmental Health Team at Tallaght, Rathcoole and Walkinstown.</p> <p>However, the number or location of air quality monitoring devices is a matter for the EPA and not something that comes under the remit of the County Development Plan.</p> <p><b>CE Recommendation</b></p> <p>No change to the Draft Plan</p>
<p>SD-C195-234 Development Applications Unit</p>	<p>Requested the inclusion of a Light Pollution Policy to use LED luminaires with warmer colours in all external lighting, identifying existing dark sky areas which need protecting and include street lighting policy and development lighting policies. The use of motion activated lighting should be installed where lighting is deemed necessary on all new greenways and on other cycle and pedestrian routes.</p> <p>A submission has requested that the design of any lighting proposals for locations close to wooded areas or rivers, ponds and lakes should take account of the possible presence of light sensitive bat species and an assessment of potential impacts should be carried out.</p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted. The Draft Plan supports the protection of Biodiversity in relation to a reduction of light pollution.</p> <p>For the first time, the Draft Plan includes the need to have consideration for environmental zones for lighting as defined by the Institute of Lighting Engineers' publication <i>Guidance Notes for the Reduction of Light Pollution</i>. The zones are set out in section 13.9.3 of the Draft Plan alongside details that need to be included in development proposals on external lighting.</p> <p>In addition, the Draft Plan includes:</p> <p><b>GI6 Objective 6:</b></p> <p>To minimise the environmental impact of external lighting within the GI network to achieve a sustainable balance between the recreational needs of an area, the safety of walking and cycling routes and the protection of light sensitive species such as bats</p> <p><b>IE7 Objective 6:</b></p> <p>To ensure external lighting schemes minimise light spillage or pollution in the immediate surrounding environment and do not</p>

		<p>adversely impact on residential or visual amenity and biodiversity in the surrounding areas.</p> <p>In respect of the provision of dark sky areas for the protection of sensitive species see policy NCBH8 Objective 5 which designates a stretch of the Dodder River Corridor as 'ecological network free from intrusive lighting'</p> <p>It is also noted that all new LED lighting in the County uses warm light spectrum colouring.</p> <p>It is considered that IE7 Objective 6 can be strengthened by the inclusion of reference to the Lighting Engineers guidance on the reduction of light pollution. It is also considered that new text should be added to Chapter 13 Implementation and Monitoring to ensure that lighting is considered early on in the pre-planning stage of development applications to ensure it is co-ordinated with the wider development and landscaping proposals.</p> <p><b>CE Recommendation:</b></p> <p>Amend IE7 Objective 6 to read:</p> <p><b>IE7 Objective 6:</b></p> <p>To ensure external lighting schemes minimise light spillage or pollution in the immediate surrounding environment and do not adversely impact on residential or visual amenity and biodiversity in the surrounding areas <b>having regard to the Institute of Lighting Engineers' <i>Guidance Notes for the Reduction of Light Pollution (UK)</i>. (see section 13.9.3 (iii))</b></p> <p>And include amended and additional text within Chapter 13 section 13.9.3 (iii) as the first paragraphs after (iii) as follows:</p> <p><b>Co-ordination of Landscape Proposals and Public Lighting (and other utilities)</b></p>
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		<p>The co-ordination of proposed Landscape Plans and Public Lighting Plans (and other utilities) will be required from the pre-planning stage all the way through the planning application process to compliance. This is to ensure that all landscape proposals and public lighting on site are practically viable and compatible.</p> <p>A co-ordinated plan showing the proposed landscape plan and proposed public lighting and other services should be submitted and developers should ensure that landscape proposals and the public lighting proposals, to the standard of SDCC Lighting, are feasible. The above coordination is required at all stages of the planning process, in addition to plans illustrating the landscape and public lighting proposals and details separately.</p> <p><b>Environmental Zones for Lighting Plan</b></p> <p>The success of lighting design will rely heavily on striking the right balance between light and dark over the various areas of lands concerned and their immediate contexts, whether this is local area plans or individual sites. In assessing planning applications or preparing plans, the designation of Environmental Zones, as defined by the Institute of Lighting Engineers' publication, Guidance Notes for the Reduction of Light Pollution published in the UK and as set out below is required.</p> <p>All residential developments above 5 residential units and all other proposed developments shall submit a Lighting Plan showing proposed Environmental Zones for Lighting that outline the zones of lighting within the site. This Environmental Zones for Lighting Plan should ensure appropriate levels of light and dark throughout the site to respond to ecological surveys, the conditions on site, the proposals for the site and the need to protect biodiversity and provide appropriate levels of lighting for public safety.</p>
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		<p>The Lighting Plan should consider, in addition to the creation of dark zones, the mitigation of proposed lit areas where appropriate. This can include variations in light levels and intensity and other mitigation measures such as light direction, cowling, light colour etc.</p> <p>The plan to be based on the Environmental Zones for Lighting as set out in Table 13.28 below.</p>
<p>SD-C195-266 Christine Noonan</p>	<p>A submission has raised concerns regarding the impact of noise and air pollution on the R134 from Grange Castle and Baldonnell Industrial Parks, associated construction projects in the area such as Grange Castle, Kilcarberry and schools the noise from Baldonnell Airport and quarry blasting.</p> <p>Each planning application sought is considered as a standalone case in regard to Environmental Impact Assessment and smaller developments have no EIA. The submission highlights that all applications should be taken on a cumulative basis, with start and end point assessments. It further states that the current process allows a 'carte blanche' approach with no regard for cumulative effects on the environment or impact on human health due to emissions.</p> <p>Reference has been made in this submission to the EPA submission.</p>	<p><b>CE Response:</b></p> <p>The contents of the submission are noted. Where planning permission is granted construction projects will have construction management plans attached to their conditions for permission. They will also be subject to Environmental Health legislation. The implementation of these requirements is a matter for EHOs and Planning Enforcement as appropriate and is outside the remit of the Development Plan.</p> <p>The Draft Plan contains policy and objectives relating to noise and air in Chapter 11 Infrastructure, section 11.6. In this regard, IE7 Objective 1 states:</p> <p><i>To implement the provisions of national and EU Directives on air and noise pollution and other relevant legislative requirements in conjunction with other agencies as appropriate. (Consistent with RPO 10.10 of the RSES)</i></p> <p>Further objectives deal directly with implementing the Dublin Regional Air Quality Management Plan and the Dublin Agglomeration Environmental Noise Action Plan.</p> <p>IE7 Objective 5 states:</p> <p><i>To ensure that future developments are designed and constructed to minimise noise disturbance and take into account the multi-functional uses of streets including movement and recreation as detailed in the Urban Design Manual (2009) and the Design Manual for Urban Roads and Streets (2013).</i></p>

		<p>The Environmental Impact Assessment Directive (EIA Directive) 2011/92/EU, as amended by Directive 2014/52/EU relates to the assessment of the effects of certain public and private projects on the environment. The implementation of the Directive is carried out at planning application stage when the requirements of the Directive and of the associated Section 28 Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018) are taken into consideration. Planning applications are subject to their own consultation process.</p> <p><b>CE Recommendation</b></p> <p>No change to the Draft Plan</p>
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<b>Airports and Aerodromes: Casement</b>		
<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation</b>
<p>SD-C195-5 Department of Defence</p> <p>SD-C195-32 Department of Defence</p> <p>SD-C195-131 NVD Limited</p>	<p>The Department of Defence states that development in the environs of Casement Aerodrome should be restricted having regard to the following factors (which will affect military capacity at the Casement Aerodrome):</p> <ul style="list-style-type: none"> <li>- Prohibiting development within the immediately adjacent approach areas to reduce risk to members of the public and the increased risk to occupants of an aircraft in the event of the aircraft accidentally touch down outside the aerodrome boundary.</li> <li>- Applying height restrictions to development in the environs of the Aerodrome.</li> <li>- Eliminating potential sources of interference with the operation of electronic navigation aids.</li> </ul>	<p><b>CE Response:</b></p> <p>The possible error suggested by NVD for the Approach Surface (APPS) and Take off Climb Surface (TOCS) for Runway 28/10 is noted. However, the Department of Defence have clarified this matter in their submission and addendum and while there is an error it is not as identified by the NVD submission.</p> <p>The Department has provided revised Aerodrome Reference Point (ARP) being located 531811N, 0062719W, with all Airport information published on the Military website. Having regard to this, the approach surfaces and take off climb surface for Casement should be revised on Sheet 14 Full Aviation Map and Sheet 1 Index Map.</p> <p>Further issues raised by the Department of Defence have been carefully considered and the information provided in the submission is welcomed. Chapter 11 Section 11, Airports and</p>

	<p>- Obviating possible hazards to aircraft through the generation of smoke, dust or fumes which may reduce visibility.</p> <p>- Controlling and assessing the locations of any activities which may be an attraction to birds.</p> <p>- Limiting the extent, height and type of external lighting to avoid confusing pilots.</p> <p>Runway information is provided for Runway 10 (Current and Future Runway details), Runway 28, Runway 22 and Runway 04.</p> <p>Information of Non-ICAO measures applied by the Department of Defence for security reasons are also mentioned also include the 2 kilometre zone, the security zone, measures to reduce the slight risk to persons or property on the ground, activities likely to increase hazard to aircraft due to wildlife, temporary hazards associated with development and other hazards associated with development.</p> <p>An addendum to the submission was attached following a meeting with South Dublin County Council and the Department of Defence and Air Corp on the 5th August. This Addendum states the following points:</p> <p>- Attached runway movements for Casement/Baldonnell for the years 2018 and 2019 as part of this submission. Total runway moves are 16,665 and total IFR approaches are 754.</p> <p>- Aerodrome Reference Point (ARP) is located 531811N, 0062719W, with all Airport information published on the Military website.</p>	<p>Aerodrome and Chapter 13, Section 13.9.5, includes for the restrictions stated in the submission by the Department of Defence.</p> <p>The council will continue to work with the Department of Defence on all aviation matters.</p> <p>It is considered that the Development Plan maps should be revised in line with the corrections submitted by the Department of Defence.</p> <p><b>CE Recommendation:</b></p> <p>Amend the Draft Plan as follows:</p> <ul style="list-style-type: none"> <li>- Map corrections to the Approach and Take-off Climb Surfaces beside runway 28. Both will be moved by 180m to the west (Approach: 60m from displaced Threshold 29, take-off: 60 m from the end of paving).</li> </ul>
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	<p>- Submission states that there are no recent 'Type A' charts available at this time, the Department will forward them as soon as possible.</p> <p>- Submission states that the Air Crops safeguarding policy for Casement as outlined in the Department of Defence submission has not been changed.</p> <p>The NVD submission considers that the Approach Surface (APPS) and Take off Climb Surface (TOCS) for Runway 28/10 should be drawn from the same distance of 60m from the runway and therefore requested that the Aviation Maps be revised.</p> <p>Map attached with submission. Attached report from Airport Planning and Development LTD (APD) was considered as part of this submission.</p>	 <p style="text-align: center;">Draft</p> <p style="text-align: center;">Proposed Amendment</p> <ul style="list-style-type: none"> <li>- Text on the map stating '86.6m' OD to be disconnected from 'ARP' and moved westwards. This elevation relates to Runway 10.</li> <li>- The ARP will be moved to 531811N, 0062719W.</li> <li>- The 'Security zone' will be included on the Index Map similar to its inclusion on the general aviation map.</li> </ul>
<p>SD-C195-112 John Spain Associates</p>	<p>Submission seeks an amendment to Policy IE8 Objective 3 as follows: "To implement the principles of shielding (comprising existing structures and features such as trees and roads lighting/signage, as well as permitted development) in assessing proposed development in the</p>	<p><b>CE Response:</b></p> <p>The principles of shielding are dealt with and explained in Chapter 13 Section 13.9.7 Shielding/Safeguarding of the plan, where</p>



	vicinity of Aerodromes, having regard to Section 3.23 of the Irish Aviation Authority Guidance Material on Aerodrome Annex 14 Surfaces (2015) (See Chapter 13 Implementation and Monitoring).”	<p>existing structures and features such as buildings, trees and roads lighting/signage, as well as proposed development are discussed.</p> <p>Furthermore, as stated within the objective, Section 3.23 of the Irish Aviation Authority Guidance Material on Aerodrome Annex 14 Surfaces (2015) also highlights the principles of shielding.</p> <p><b>CE Recommendation</b></p> <p>No change to the Draft Plan.</p>
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<b>Airports and Aerodromes: Weston</b>		
<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation</b>
<p><a href="#">SD-C195-20 Catherine Murphy</a></p> <p><a href="#">SD-C195-237 Caitriona McClean</a></p> <p><a href="#">SD-C195-225 An Cláomh Glas</a></p> <p><a href="#">SD-C195-42 James Lawless</a></p> <p><a href="#">SD-C195-231 Linda Curran</a></p>	<p>1. Noise</p> <p>It is stated that due to Casement and Weston both being located within South Dublin County Councils jurisdiction, that reference to the South Dublin Noise Action Plan (and any updates) be included in Section 11.7.6 Airport and Aerodrome - Noise.</p> <p>It is indicated that the planes at Weston fly to a tight circuit and as a result regulations allow for low level flying. It is further explained that the issues of noise at Weston arise from the demand for circuit training and the frequency of touch and go movements with low flying planes. Therefore, the height of planes within the circuit is low and noise to residents is made worse when the land rises as it does at Riverdale Estate in Leixlip. It is also noted that take off noise of some of the larger planes in proximity to homes is also an issue.</p> <p>It is noted that any expansion by Weston would be governed by a planning permission with the expectation that noise prevention or reduction would be included in any</p>	<p><b>CE Response:</b></p> <p>Section 11.6.2 Noise of Chapter 11 in the Draft Plan outlines the requirements under the European Communities (Environmental Noises) Regulations (2018) for local authorities to prepare strategic noise maps and noise management action plans for transport noise sources including airports. The Dublin Agglomeration Noise Action Plan 2018-2023 is due to be reviewed in 2022. The inclusion of Weston as part of any revised Noise Action Plan is one for the EPA and South Dublin’s Environmental Health Officers and is a matter outside the remit of the County Development Plan.</p> <p>Policy IE7: Environmental Quality in the Draft Plan seeks to take appropriate steps to reduce the effect of air, noise and light pollution on environmental quality and residential amenity in line with European, National and Regional policy and legislation.</p> <p>IE7 Objective 1 states:</p> <p>To implement the provisions of national and EU Directives on air and noise pollution and other relevant legislative requirements in</p>

	<p>permission. This should not only be specific to the individual planning permission but would need to involve the cumulative effect.</p> <p>A further submission recommends that noise pollution be monitored on a regular basis in association with Weston Aerodrome; that larger planes and their frequency also be monitored, and; that runways not be extended to accommodate changes in aircraft type. It is recommended that SDCC work with Kildare Council on this to ensure consistency of approach.</p> <p>A number of submissions state that the operation of small planes and helicopters out of Weston Airport, and in particular their constant flying over their houses and the village of Leixlip at very low levels, is creating an unacceptable amount of environmental noise pollution. It is indicated that this is having a dramatic effect on the mental health of local residents and makes it difficult to enjoy being outdoors. It is stated that according to the Federal Aviation Regulation (FAR), the minimum altitude over urban areas is 1,000 ft above 'any congested area of a city, town, or settlement, or over any open-air assembly of persons (section 91.119) and that planes are flying lower than that. South Dublin is seen as having the responsibility to develop an Action Plan to reduce ambient noise in their residential area. It is indicated that noise restrictions have not been updated since 1999 to take into account the increased traffic volume.</p> <p>An Claiomh Glas (Environmental NGO) are supportive of the submission from the Deputy Catherine Murphy.</p>	<p>conjunction with other agencies as appropriate (Consistent with RPO 10.10 of the RSES)</p> <p>IE7 Objective 4 states:</p> <p>To implement the relevant spatial planning recommendations and actions of the <i>Dublin Agglomeration Environmental Noise Action Plan 2018-2023</i> or any superseding action plan.</p> <p>Within Section 11.7.3 Weston Airport, Policy IE9 Objective 4 provides as follows 'restrict any further effective lengthening of the operational runway or over-run areas, until such time that the status of the current runway is regularised and full environmental assessments including noise and impact on local communities are carried out'.</p> <p>It is recommended that IE9 Objective 4 is amended to take account of the 'balanced approach' to noise management of airports supported by the ICAO and EU policy.</p> <p><b>CE Recommendation:</b></p> <p>Amend objectives IE9 Objective 4 to read:</p> <p>From:</p> <p>To restrict any further effective lengthening of the operational runway or over-run areas, until such time that the status of the current runway is regularised and full environmental assessments including noise and impact on local communities are carried out.</p> <p>To:</p> <p>To ensure a balanced approach to any further lengthening of the permitted runway or over-run areas having regard to the need for environmental and other assessments including noise and assessment of the impact on local communities.</p>
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<p>SD-C195-200 Darragh Owens</p>	<p>This submission indicates it is pleased to note the implementation of Aviation Safeguarding and Public Safety Zones specified in the Aviation Technical Guidance Map.</p> <p>This submission welcomes the retention of Zoning Objective RU in the area surrounding Weston Airport, and the retention of Zoning Objective HA (LV) in the adjacent area north of the M4 Motorway and River Liffey.</p> <p>This submission is pleased to note the inclusion of Policy IE9 Weston Airport, specifically highlighting the goals of the National Aviation Policy for Ireland (2015), which will enhance the development of general aviation (GA) activity at Weston Airport.</p>	<p><b>CE Response:</b></p> <p>Comments made in relation to Weston Airport from the National Flight Centres Ltd. are noted.</p> <p>Policy IE9 which the submission references states:</p> <p><i>Safeguard, having regard to the requirements of the Irish Aviation Authority (IAA), the current and future operational, safety and technical requirements of Weston Airport and prevent encroachment of development around the airport which may interfere with its safe operation, in the context of the proper planning and sustainable development of the area and the protection of surrounding amenities.</i></p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p>SD-C195-63 Kildare County Council</p>	<p>This submission welcomes IE9 Objective 5 and the opportunity to engage with South Dublin on the consideration of applications for the development at Weston Airport.</p>	<p><b>CE Response</b></p> <p>The submission is welcomed and South Dublin will continue to engage with Kildare County Council on matters relating to Weston Airport throughout the lifetime of the Plan and into the future.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p>SD-C195-20 Catherine Murphy</p> <p>SD-C195-225 An Cláomh Glas</p>	<p>It is stated that Climate Change is a key issue and the Draft CDP responds with many good policy initiatives. Local Authorities are where many of the practical initiatives will manifest themselves and the private jet sector should be included given that private jets are 5 to 14 times more polluting than commercial planes per passenger. It is recognised that National policy needs to set a path to decarbonising but it does need to be acknowledged in the Draft Development Plan that such an objective is required.</p>	<p><b>CE Response:</b></p> <p>Climate change forms a central tenet to the Draft Plan and associated policies and objectives. It is recognised that air travel has a role to play in reducing carbon emissions. As indicated in the submission, to date National policy does not provide guidance in this regard. However, the Draft Plan contains IE9 Objective 5 (this objective was subject to published errata) which states:</p>

	<p>An Claiomh Glas (Environmental NGO) are supportive of the submission from the Deputy Catherine Murphy.</p>	<p><i>The Planning Authority will engage with Kildare County Council, to guide the consideration of applications for development at Weston Airport having regard to national, regional, and local climate action plans.</i></p> <p>Furthermore, the provision of Policy IE7: Environmental Quality seeks to reduce the effects of air pollution on environmental quality and residential amenity in line with European, National and Regional policy legislation and is supported by IE7 Objective 1, 2 and 3.</p> <p>The Draft Plan also contains Policy CA1: Climate Action (CA) which supports the implementation of international and National objectives on climate action including the Climate Action and Low Carbon Development Act 2015 (and any amending legislation), the 'Climate Action Plan 2019' (and any updated Plans) and ensuring that South Dublin's Climate Action Plan and County Development Plan are aligned.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
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<b>Public Safety Zones</b>		
<b>Submission No.</b>	<b>Submission Summary</b>	<b>CE response and recommendation</b>
<p><a href="#">SD-C195-20 Catherine Murphy</a></p> <p><a href="#">SD-C195-225 An Claiomh Glas</a></p> <p><a href="#">SD-C195-131 NVD Limited</a></p>	<p>2. Public Safety Zones:</p> <p>It is stated that before the construction of the stopway/clearway a variety of homes and businesses already existed in the area. If public safety zones are developed at Weston, this would have an impact on existing homes and businesses in South Dublin and Kildare. This will also limit development and affect home owners greatly in the area. The issues of insurance and compensation are raised.</p>	<p><b>CE Response:</b></p> <p>The issues raised in relation to Public Safety Zones at Weston Airport are noted.</p> <p>South Dublin will continue to liaise with Kildare County Council on matters relating to Weston Airport as set out in the Draft Plan IE9 Objective 5. However, the corresponding Public Safety Zone within</p>

	<p>A dual consultation approach between South Dublin and Kildare County Council would be needed in advance of the establishment of any Public Safety.</p> <p>Licensing is also raised as an issue due to the IAA not being required to notify the relevant Local Authority of changes to the operation of the airport, which may impact IE Objective 4.</p> <p>An Claiomh Glas (Environmental NGO) are supportive of the submission from the Deputy Catherine Murphy.</p> <p>A submission from NVD looks for IE8 Objective 4 to be amended as follows:</p> <p>To prohibit and restrict development in the environs of Casement aerodrome, where it may cause a safety hazard. In general, no development shall be permitted in the public safety zone. (see also Chapter 13 Implementation and Monitoring). <b>Where new development is proposed within a Public Safety Zone, a Risk Assessment should be submitted.</b></p> <p>Attached report from Airport Planning and Development LTD (APD) was considered as part of this submission.</p>	<p>Kildare will be a matter for Kildare County Council as part of the reserved function of making a Development Plan.</p> <p>The introduction of Public Safety Zones at Weston is not intended to affect any existing building. Development is already restricted in the 'Red zones' which are on the current 2016 Development Plan and previous development plans. The red zones are being replaced by more appropriate Public Safety Zones, and these zones are intended to minimize risk rather than increase it. It is noted that the public safety zones are generally less wide than the old Red Zones (except at their base closest to the runway). Where they are longer than the red zones were, within South Dublin, it is the outer public safety zones. Existing land use would not exceed the human occupation limitations set out for the outer PSZ in the Draft Plan objectives, noting that most of the extra length is over the N4 and St. Catherine's Park/Lucan Demesne.</p> <p>The Draft Plan provides for Public Safety Zones under section 11.7.7. However, this does not include for associated policy and objectives which would clarify the criteria to be applied to the inner and outer PSZs. It is considered that this clarity should be inserted into the Plan having regard to an accepted understanding of appropriate restrictions and land use management within airport public safety zones. Having regard to the request that a sentence be added to Policy IE8 Objective 4 (page 410) "...Where New Development is proposed within a PSZ, a Risk Assessment should be submitted" it is considered that this is better addressed through clear policy and objectives within the Public Safety Zone section of the Plan and amending IE8 Objective 4 to reference the PSZ section and associated policy.</p> <p>The issue with licencing is noted but is a matter of regulation outside the control of the Planning Authority and the Development Plan.</p> <p><b>CE Recommendation</b></p>
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		<p>Insert new policy and objectives into section 11.7.7 Public Safety Zones and amend IE8 Objective 4 and IE9 Objective 1 as follows:</p> <p><b>Policy IE13: Public Safety Zones</b></p> <p>Improve protection for the public on the ground, in the event of an aircraft crash occurring, through the provision of Inner and Outer Public Safety Zones around airports</p> <p><b>IE13 Objective 1:</b></p> <p>To prohibit all new development involving human occupancy in the Inner Public Safety Zones at Weston and Casement Aerodromes as identified on the Development Plan maps.</p> <p><b>IE13 Objective 2:</b></p> <p>To limit all new development in the new Outer Public Safety Zones at Weston and Casement Aerodromes to development with occupancies per half hectare of –  60 persons or less for housing/residential,  85 persons or less for retail or leisure,  110 persons or less for working premises, and  with a prohibition (in the Outer Public Safety Zones) on sports stadia, and on any <i>new</i> sensitive/institutional development such as schools or medical facilities, and on any <i>new</i> development involving 24-hour occupancy such as retirement homes.</p> <p><b>IE13 Objective 3:</b></p> <p>To review, as appropriate, Public Safety Zone dimensions and occupancy limits in accordance with actual and predicted air traffic figures and with regard for any recommended international airport Public Safety Zone practice.</p> <p><b>Amendments to related objectives in Section 11</b></p>
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		<p><b>Amend IE8 Objective 4</b></p> <p>From:</p> <p>To prohibit and restrict development in the environs of Casement aerodrome, where it may cause a safety hazard. In general, no development shall be permitted in the public safety zone. (See also Chapter 13 Implementation and Monitoring).</p> <p>To:</p> <p>“IE8 Objective 4: To prohibit and restrict development in the environs of Casement Aerodrome, where it may cause a safety hazard. (See also <b>Policy IE13 Public Safety Zones, and Chapter 13 Implementation and Monitoring</b>).”</p> <p><b>Amend IE9 Objective 1</b></p> <p>From:</p> <p>To ensure the safety of air traffic to and from Weston Airport with full regard for the safety of persons on the ground as well as the necessity for causing the least possible inconvenience to local communities</p> <p>To:</p> <p>To safeguard air traffic to and from Weston Airport while ensuring the least possible inconvenience to local communities and with full regard for the safety of persons on the ground</p>
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# Chapter 12: Our Neighbourhoods

**(No Issues)**



# **Chapter 13:**

## **Implementation and Monitoring**

## Chapter 13: Implementation and Monitoring

Overview Land-Use Zoning Objectives		
Submission No.	Submission Summary	CE response and recommendation
SD-C195-65 Daragh Cagney	<p>The submission relates to a retail property located at Fonthill Retail Park located on the Fonthill Road proximate to the Liffey Valley Shopping Centre and requests to include the use 'Shop Neighbourhood' as 'Open for Consideration' under the RW land Use Objective.</p> <p>The submission highlights that in the 2016 Development Plan the zoning on four sites including Fonthill Retail Park and the Avoca Outlet at Rathcoole were changed to Retail Warehouse (RW) and now many uses under this objective are not permitted including exiting uses currently at the Retail Park. The submission considers that if the RW objective is to remain in place for the 2022- 2028 Plan that it requires further scope to be relevant and practical.</p> <p>The submission highlights a number of reasons and considerations as to why 'Shop Neighbourhood' use class should be included:</p> <ul style="list-style-type: none"> <li>• Retail has had to evolve during Covid and retail offering need space to social distance and their own dedicated entrance;</li> <li>• Store-based retailing needs the encouragement and support of the Council to combat the wave of internet shopping;</li> <li>• Inclusion of this use class as being 'Open for Consideration' merely acknowledges that retail is a flexible and an ever-evolving business;</li> <li>• Both Retail Warehouse and Shop Neighbourhood are included as Open for Consideration acknowledging that</li> </ul>	<p><b>CE Response</b></p> <p>The issues raised in the submission are noted.</p> <p>It is noted that Policy EDE15: Retail Warehousing of the Draft Plan and the associated objectives and the provision of a 'RW' zoning provides a policy context to accommodate a demand for retail warehousing in the County and cluster such uses to minimise traffic generation in accordance with the Retail Planning Guidelines 2012. Fonthill Retail Park is identified as an established cluster and the 'RW' zoning is intended to consolidate the cluster. The provision of a RW zoning to enable a consolidation of existing facilities provides a framework for carefully assessing the provision elsewhere in the County. The land use zoning table for Retail Warehousing (RW) in the Draft Plan is representative of the policies and objectives which align with the recommendations of the Retail Planning Guidelines. The aim of lands subject to the retail warehousing 'RW' zoning objective is to accommodate the consolidation of existing retail warehousing in the County and new retail warehousing floor space.</p> <p>The submission outlines that the land use class 'Shop Neighbourhood' should be considered as 'Open for Consideration'. It should be noted that 'Shop-Neighbourhood', as defined under Appendix 6 'Definition of Use-Classes' of the Draft Plan, relates to smaller shops giving a localised service in a range of retail trades or businesses such as butcher, grocer, newsagent, hairdresser, dry cleaning or launderette, and designed to cater for normal neighbourhood requirements. It also includes a small supermarket on a scale directly related to the role and function of the settlement and its catchment and not exceeding 2,500 sq.m. net retail</p>

	<p>these uses are not necessarily mutually exclusive. under the REGEN zoning; and</p> <p>Minimal change to the RW matrix that is in keeping with the established development pattern at the Fonthill and Avoca sites and cognisant of the precedent already established by previous planning grants.</p>	<p>floorspace. It is noted that the inclusion of 'Shop-Neighbourhood' as a permissive or open for consideration use on RW zoned lands would therefore be inconsistent with the objective of RW zoned lands. A 'Shop-Neighbourhood' use would be more appropriately accommodated adjacent to existing or new residential development and within the Urban Centres of the County, as reflected in the land use zoning objectives and tables where the use is generally permitted in principle or open for consideration in 'RES', 'RES-N', 'REGEN', 'TC', 'DC', 'VC', 'MRC' and 'LC' zones.</p> <p>In this context, it is noted that to have 'Shop-Neighbourhood' use as open for consideration under the RW zoning objective, would be at variance with policies and objectives pertaining to the RW zoning objective and undermine RW zoned land and other retail parks within the county.</p> <p>Notwithstanding the above, and with respect to the existing permitted uses on site, it is noted that Section 13.1.1' Land-Use Zoning Tables', (vi) Non-Conforming Uses of the Draft Plan states that there are instances throughout the County where land uses do not conform with the zoning objective of a site. Having regard to the function and existence of the permitted uses within Fonthill Retail Park and the provisions of Section 13.1.1 (vi) in the Draft Plan, it is noted that existing uses which do not fall within the RW zoning matrix will be assessed in any planning application as non-conforming.</p> <p><b>CE Recommendation</b></p> <p>No change to Draft Plan.</p>
<p><a href="#">SD-C195-192 Killeen Motor Group</a></p>	<p>This submission looks for an amendment to the MRC zoning to include "Offices over 1,000 sq.m" as "Open for Consideration" in the Draft CDP. It is also stated that this can be limited to sites outside the Retail Core Area (as identified in Figure 6.3 of the Draft Plan).</p>	<p><b>CE Response</b></p> <p>The issue raised in the submission are noted.</p> <p>EDE10 Objective 1 supports Liffey Valley as a Major Retail Centre. The zoning extends beyond the Liffey Valley core retail area</p>

		<p>identified in the Draft Plan as consisting of the Liffey Valley shopping centre including an opportunity site to the south of the main building. As such, the uses on the approach to Liffey Valley to the west, which include hotel, car showrooms and office development are also within the MRC zoning. This zoning provides primarily for a wide variety and size of retail uses with some associated type uses such as recreational, hotel, public house.</p> <p>Within the Draft Plan, the zoning objective MRC includes offices less than 100sq m as permitted in principle and offices 100sq m to 1000sq m as open for consideration. Offices over 1000m<sup>2</sup> are not permitted within the zoning matrix. It is noted that offices currently exist in the area with Volkswagen Group Ireland, Abbott and Valero Energy Ireland Limited all based in office units in the surrounding area. However, it is the policy of the Council to direct people intensive enterprise and employment uses such as major office developments to the main urban centres and zoned employment lands to strengthen existing employment/mixed use centres and to support people intensive enterprise and employment uses in close proximity to quality public transport. While it is recognised that transport provision to Liffey Valley is to improve with a bus hub, the provision of people intensive enterprise such as major office developments over 1000sqm located sporadically would undermine the vitality of the main urban centres office development.</p> <p>Therefore, it is considered that the land use zoning tables in the Draft Plan are appropriate and will ensure that the location of large scale office is located in appropriately zoned employment lands and in the main mixed use urban centres of the County.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan</p>
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<p>SD-C195-211 Fáilte Ireland National Tourism Development Authority</p> <p>SD-C195-109 South Dublin Conservation Society</p>	<p>This submission welcomes the 'High amenity Zonings' relating to the Dublin Mountains, Liffey Valley and the Dodder, with the council to consider the inclusion of Camp Site to the Open for Consideration category.</p> <p>Another submission has requested that zoning objective 'HA-DM' should omit allotment from the 'not permitted' category and include it in the 'open for consideration' category.</p>	<p><b>CE Response:</b></p> <p>This submission is noted and acknowledged.</p> <p>The Council welcomes support for High Amenity Zonings within the Draft Plan.</p> <p>High Amenity zonings require a Landscape Impact Assessment for development proposals, in order to protect designated views and prospects. The Landscape Character Areas map on Page 108 of the plan identifies HA-DM, as having a high sensitivity and HA-LV and HA-DV as Medium to High.</p> <p>Policy NCBH14: Landscapes looks to preserve and enhance the character of the County's landscapes, particularly areas that have been deemed to have a medium to high Landscape Value or a high Landscape Sensitivity and to ensure that landscape considerations are an important factor in the management of development.</p> <p>All three HA zonings look to protect the sensitive landscape of South Dublin from Development and any adverse environmental and/or biodiversity impacts which may occur due to development happening.</p> <p>It is noted that 'camp site' is not a land use class in the Draft Plan or in the current 2016 plan. Should such a use be proposed it will be judged on its merits having regard to the zoning objective.</p> <p>Therefore, it is considered that the land use zoning tables in the Draft Plan are appropriate and will ensure that the High Amenity zonings are protected from over development.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p>SD-C195-286 Belgard Area Residents Association</p>	<p>The submission suggests that the inclusion of 'Residential' as 'Open for Consideration' is a planning sleight of hand as</p>	<p><b>CE Response</b></p>

	<p>an attempt at residential development by stealth by hiding the option under Objective 'OS' which also raises concerns about the use of open spaces, parks and other valued amenities.</p>	<p>The contents of these submissions are noted and acknowledged.</p>
<p>SD-C195-149 Joseph Scully</p>	<p>A submission calls for changes to the Open Space – land use zoning tables in light of the current Government residential building program and the pressure placed on open space to provide housing.</p> <p>The submission highlights the Council policy in regard to open space as per an extract from the Council minutes of Feb 12th 2007 as follows: “if a planning application for residential development is made on lands which have been conditioned as public open space in a private development, the Planning Authority could and would refuse permission and such refusal does not give rise to a right to compensation”.</p> <p>The submission calls for the draft plan to be amended to ensure that lands conditioned as open space in a planning permission for a private development is NOT open for consideration for housing purposes, as per the following:</p> <ul style="list-style-type: none"> <li>• That Open Spaces, conditioned on foot of planning permission, be identified by an asterisk on the development plan maps, and</li> <li>• The text on land Use zoning tables for 'Open Space', that 'Open for Consideration' be amended to read 'residential (excluding lands conditioned as public open space in a planning permission in a private development)'.</li> </ul>	<p>The inclusion of Residential and Housing for Older People as 'Open for Consideration' under the 'OS' zoning objective must be viewed in the context of H3 Objective 4 in the Draft Plan which states:</p> <p><i>To support community led housing developments for older people and social and Council affordable housing in established areas on lands designated with Zoning Objective “OS” (To preserve and provide for open space and recreational amenities), only where the quality and quantum of remaining public open spaces is deemed to be adequate and the amenities of the area are preserved.</i></p> <p>It is noted that in South Dublin there has been a legacy of older Council estates, in particular where large areas of public open space were provided. However, in some instances these open spaces are not functioning as they should and would not meet standards of multi-functionality and security, including passive surveillance, that would be best practice today. In light of this, and in the interests of compact growth and better layout and design, there are times when open space is more efficiently used for housing.</p> <p>H3 Objective 4 stipulates that “<b>only where the quality and quantum of remaining public open spaces is deemed to be adequate, and the amenities of the area are preserved</b>” [EMPHASIS ADDED] will housing developments for older people and social and Council affordable housing in established areas on lands designated with Zoning Objective “OS” be supported.</p> <p>In addition to the above it should be noted that the Draft Plan supports a hierarchy of multi-functional, accessible parks and public open spaces across the County in line with Table 8.1, based on existing populations and planned growth in accordance with the</p>

		overall standard of 2.4ha per 1,000 population. COS5 Objective 1 refers to such provisions.
SD-C195-154 Tallaght Community Council	<p>The submission queries under Page 517 – Open Space Land Uses – why permitted uses list “residential” in the for consideration uses and suggests this might be a typo.</p> <p>In the event it is, the submission requests that it is removed to preserve OS and Recreational space as adding residential would be contradictory.</p>	<p>In addition, as per Section 8.7.1 of the Draft Plan and the ‘Principles Guiding Public Open Space Provision’, the Parks and Open Space Strategy 2021 – which is currently in development – will provide the basis for the upgrade, provision, management and maintenance of publicly managed parks and open spaces, complementing the Draft Plan policies and objectives relating to Parks and Public Open Space (Section 8.7) and the Green Infrastructure Strategy (Chapter 4).</p>
SD-C195-279 Ballyboden Tidy Towns Group	<p>The submission requests residential is removed from ‘Open for Consideration’ uses under Zoning Objective ‘OS’ in order to preserve and protect open space and green space in the county.</p>	<p>Therefore, it is considered that the inclusion of Residential as ‘Open for Consideration’ is appropriate in the context H3 Objective 4.</p> <p>In addition, it is considered that the zoning matrix should include a footnote after ‘Housing for Older People’ and ‘Residential’ where these are open for consideration to state:</p> <p>‘Only where this accords with H3 Objective 4’</p> <p><b>CE Recommendation</b></p> <p>Amend Open Space zoning matrix to include a footnote after ‘Housing for Older People’ and ‘Residential’ where these are open for consideration to state:</p> <p>‘Only where this accords with H3 Objective 4’</p>
SD-C195-136 An Post	<p>This submission looks for a new land use zoning classification to be included in the Draft CDP as follows:</p> <p>Postal Facilities:*A building which facilitates mail services that can include the processing, sortation and distribution of mail.</p>	<p><b>CE Response:</b></p> <p>The submission is noted and acknowledged.</p> <p>Notwithstanding An Post’s role in the provision of an important service for South Dublin, it is not considered appropriate to include a specific reference to any particular business or organisation, in</p>

	<p><i>*Note: This use can be assessed on a case by case basis appropriate to site context and all other relevant policies, objectives and standards set out in this Plan.</i></p> <p>It is requested that this land use is considered 'Permitted in Principle' or 'Open for Consideration' in the following zoning objectives:</p> <ul style="list-style-type: none"> <li>- Regen, TC, EE, RW (Permitted in Principle)</li> <li>- Res, Res-N, DC, VC, MRC, LC (Open for Consideration)</li> </ul>	<p>the context requested by the submitter, in the Draft Plan. It is considered that there is sufficient flexibility in the use classes provided to allow the consideration of the use proposed at appropriate locations.</p> <p>Individual planning applications are determined on their merits through the development management system and as indicated above, it is considered that the objectives in the Draft Plan provide sufficient provision to allow for the consideration of the use proposed.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>
SD-C195-87 Gareth Stanley	<p>The submission refers the zoned RES-N lands to the east of Stoney Hill Road (7.7 hectares) is in their ownership. The submission details issues in which they have encountered with RES-N land use zoning - "To provide for new residential communities in accordance with approved area plans". The submission notes that there is a lack of guidance and no definitions in the Development plan nor 28 Ministerial Guidelines or primary and secondary legislation on what an 'approved area plan' is and how it should be formulated. Furthermore, the submission highlights that it is unclear who is authorised to 'approve' the area plan and what the Council's constitutional position is, in this process. The submission notes that landowners and developer encounter difficulties when trying to draft and agree approved area plans.</p> <p>The submission points out the findings of the Inspectors Report in on approved Strategic Housing Development (SHD) application ABP-307698-20 (for the development of 204 No. residential units and associated infrastructure, services and facilities on RES-N zoned lands to east and north of Stoney Hill Road, Rathcoole). The submission notes</p>	<p><b>CE Response</b></p> <p>This submission is noted. The submission requests that that the Council change the RES-N zoning objective to state "To provide for new residential communities in accordance with approved site-specific masterplans", in the interest of housing delivery over the new plan period to 2028.</p> <p>As per Table 13.3 in the Draft Plan, the Zoning Objective RES-N states 'To provide for new residential communities in accordance with approved area plans'</p> <p>The Draft Plan includes detailed provisions in relation to Plans and Frameworks as set out in Section 5.4 which includes the following:</p> <p><i>Policy QDP13: Plans/Frameworks – General</i></p> <p><i>Continue to work closely with all infrastructure providers to ensure the timely delivery of social, community, economic and sustainable transportation infrastructure in tandem with new residential development and in accordance with the provisions of the County Development Plan or any Local Area Plan, SDZ Planning Scheme or framework/masterplan in place in the area.</i></p>



	<p>that in the Inspector's report and his consideration of the RES-N zoning objective, he agreed with the Council's recommendation to approve the area plan that was submitted with the SHD application however, the submission points out that it was obvious from the report that the Inspector was unsure of the statutory standing of an approved area plan under the RES-N zoning objective. The Inspector stated ""...I note that the wording of the objective does not call for an adopted Action Area Plan, nor does it call for an adopted Local Area Plan and as such the lack of same should not hinder the site coming forward for development,.."</p> <p>The submission suggests a solution to this and indicates to swap the requirement for an 'approved area plan' with 'approved site-specific masterplans'. The submission highlights that A RES-N residential community in accordance with approved site-specific masterplans can provide the same function as a residential community in accordance with an approved area plan,yet can be prepared and approved incrementally through individual planning applications. A residential community in accordance with approved site-specific masterplans is particularly relevant in RES-N zoned lands with multiple land interests and where separate planning applications are submitted on these individual land parcels. A masterplan, showing access and movement, open space and landscaping, land use and density and built form and phasing, etc. can be developed in each land parcel planning application without the need to approve an area plan for the entire landholding, before any application is approved.</p> <p>The submission requests that the Council change the RESN zoning objective to state "To provide for new residential communities in accordance with approved site-specific</p>	<p>It is noted that planning permission was granted on the referenced lands and that nothing in the quote from the Planning Inspector suggests that there was any difficulty with the objective.</p> <p>To replace the words 'approved area plans' with 'approved site specific masterplans' would not create any improvement to the objective as it would still need to be approved. All it would do is limit the type of plan that may be required which is not appropriate.</p> <p>It is considered that the RES-N Zoning Objective, as set out in Table 13.3 of the Draft Plan is appropriate and is consistent with the provisions set out under Section 5.4 of the Draft Plan.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
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	masterplans”, in the interest of housing delivery over the new plan period to 2028.	
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Residential Development		
Submission No.	Submission Summary	CE response and recommendation
SD-C195-19 Knocklyon Network	Submission calls for large scale residential developments to be closely monitored to make sure that developers are complying with the terms of the planning approval and ensure compliance with current fire regulations.	<p><b>CE Response</b></p> <p>The submission is noted. Compliance with planning permission and associated conditions fall under the remit of the Enforcement Section with the Land Use Planning and Transportation Department and is not a Development Plan matter. Similarly, compliance with fire regulations is under the remit of the Chief Fire Officer for the Dublin region and is not a Development Plan matter.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
SD-C195-64 Saggart Village Residents' Association  SD-C195-251 Cllr Trevor Gilligan PC	The submissions raise concerns regarding planning applications granted, such as at a site on the Boherboy Road in 2021, without recommendations made to infrastructure in Saggart and is an example of potential zoned lands already being over-prescribed if infrastructure is not improved.	<p><b>CE Response</b></p> <p>The submission is noted. The Draft Plan includes a range of policies and objectives to support and ensure the timely provision of infrastructure in tandem with development including the following:</p> <p><b>CS3 Objective 2:</b></p> <p><i>To implement a robust monitoring process for all housing delivery including the performance of large-scale housing developments (Schemes for 100 units+) for each neighbourhood area and settlement within the County to allow for ongoing assessment of delivery targets whilst ensuring overdevelopment does not occur in any particular area and to ensure that the delivery of necessary infrastructure is possible to ensure the sustainability of communities.</i></p>

		<p><b>CS3 Objective 3:</b></p> <p><i>To provide for flexibility in achieving the housing supply targets and meeting housing demand, the Council will consider the re-distribution of housing and population figures within the settlement and Neighbourhood Areas. In this regard, where a site greater than 0.25ha has the potential to exceed the allocation for a particular Neighbourhood Area as set out under Core Strategy Table 10, the applicant must demonstrate to the Planning Authority that the necessary social and physical infrastructure is in place or can be provided as part of the application to accommodate the proposed development. The Council will monitor the delivery of housing units to ensure general compliance with the Core Strategy and housing supply targets for the County and to inform the redistribution potential outlined above.</i></p> <p><b>CS3 Objective 6:</b></p> <p><i>To ensure the phased development of new housing areas in tandem with the delivery of physical and social infrastructure provision as identified within Local Area Plans or as informed by assessments carried out by the Planning Authority.</i></p> <p>While it is not a matter for the Draft Plan to get into individual planning applications, it is noted that the lands in question are part of the Fortunestown LAP for which significant infrastructure has been and will provided.</p> <p><b>CE Recommendation</b></p> <p>No change to the Plan.</p>
<p>SD-C195-170 Dublin Cycling Campaign</p>	<p>The submission suggests measures to Address Climate Impacts and welcomes the identification of car journeys as to and from homes as an issue to be addressed but requests that further enhancement of planning</p>	<p><b>CE Response</b></p> <p>The content of the submission is noted. The Draft Plan provides for bicycle parking standards in Chapter 13 under Table 13.24: Minimum Bicycle Parking/Storage Rate.</p>

	<p>requirements for cycle storage within housing and social housing developments.</p>	<p>Bicycle parking/storage associated with residential apartments provided within the Draft Plan comply with the requirements of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2018) (the 'Apartment Guidelines') in relation to design and provision of facilities. However, it is considered appropriate to require compliance with any amendments or updates to same.</p> <p><b>CE Recommendation:</b></p> <p>To amend the following under 13.8.1 Bicycle Parking Design/Provision to: <i>'Bicycle parking/storage associated with residential apartments provided within the Draft Plan comply with the requirements of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities <b>as amended or updated</b> (the 'Apartment Guidelines') in relation to design and provision of facilities.'</i></p>
<p>SD-C195-154 Tallaght Community Council</p>	<p>The submission supports the Draft Plan statement which underlines that:</p> <p>'The Housing Strategy and Interim HNDA contained within Appendix 11 of the Development Plan carries out an evidence-based assessment for the County up to 2028. In recognising the need to provide more family type housing within new apartments, the quantum of extant planning permissions with one and two bedroom units, and potential impact high concentrations of mono type housing has on areas, especially in regeneration area, the Development Plan has set a benchmark for 3-bedroom units, set out below.'</p> <p>The submission requests SDCC to continue to uphold what is referenced above to ensure the proper and sustainable development of Tallaght.</p>	<p><b>CE Response</b></p> <p>The submissions are noted and acknowledged.</p> <p><b>CE Recommendation</b></p> <p>No change to the Draft Plan</p>

<p>SD-C195-207 Quintain Developments Ireland Limited</p> <p>SD-C195-133 CAIRN Plc</p>	<p>The submission relates to subject lands comprising of 24.2 Ha adjoining and immediately to the west of the Aderrig Development Area of the Adamstown Strategic Development Zone (SDZ). The submission details the established an excellent track record of the landowner for delivering housing units and is developing in a number of locations across the Greater Dublin Area.</p> <p>The Draft Development Plan proposes to introduce the bicycle parking standards set out in the Design Standards for New Apartments (2020) as a Development Plan requirement. The submission argues that these requirements have widely been accepted as unnecessarily onerous and rarely applied in practice by any Planning Authority, including An Bord Pleanala. It is therefore submitted that a more realistic bicycle parking ratio is imposed, such as one space per apartment.</p> <p>The submission points out that the current Development Plan (2016-2022) requires 1 long term space per 5 apartments and 1 short stay space per 10 apartments and the proposed policy, if adopted, would represent a dramatic increase in the required rate of bicycle parking at apartment developments. The submission recognises that providing more bicycle parking spaces within new developments plays an important role in the overall goal of improving sustainable mobility. Therefore, the submission suggests a requirement of c. 1 no. bicycle parking space per apartment would be a more reasonable and proportionate standard.</p> <p>The submission has further detailed and exercise to demonstrate and highlight the exceptionally high number of bicycle parking spaces over and above current practice to which this requirement would give rise by calculating all the granted SHD's in South Dublin the number of spaces</p>	<p><b>CE Response</b></p> <p>The content of the submission is noted. Bicycle parking/storage associated with residential apartments provided within the Draft Plan must comply with the requirements of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2018) (the 'Apartment Guidelines') in relation to design and provision of facilities, therefore, the Draft Plan will continue to align with Government requirements.</p> <p>In addition, the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities issued under Section 28 of the Planning and Development Act, 2000 (as amended) December 2020 requires that the following apply, not as an advisory but as a must:</p> <p><i>'The accessibility to, and secure storage of, bicycles is a key concern for apartment residents and apartment proposals <b>must</b> respond accordingly to the requirements below in their design and provision of cycle storage facilities – including:</i></p> <ul style="list-style-type: none"> <li>• <i>Quantity – a general minimum standard of 1 cycle storage space per bedroom shall be applied. For studio units, at least 1 cycle storage space shall be provided. Visitor cycle parking shall also be provided at a standard of 1 space per 2 residential units. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/enlargement, etc.</i></li> </ul> <p>As the Council is putting a strong emphasis on active travel modes withing Chapter 7 under Policy Objectives SM2, and in accordance with the Guidelines, any deviation from these standards would be decided on a case-by-case basis.</p>
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	<p>that would have to be provided if the Apartment Guidelines were applied.</p> <p>It is further noted in the submission that the bicycle parking standards from the Apartment Guidelines are not a Specific Planning Policy Requirement (SPPRR) and therefore it is contended they are taken as advisory rather than mandatory. The submission welcomes that the wording of the draft policy does allow for the Planning Authority to use its discretion to deviate from this standard, subject to justification. Nevertheless, it is submitted that it would be more appropriate for the Development Plan to state a more appropriate standard from the outset (for example 1 space per apartment).</p> <p>A further submission requests that with reference to Minimum Bicycle Parking, the submission seeks the following amendment to Table 13.24:</p> <p>Land Use/Residential Apartment</p> <p>Long Term – 1 per bedroom</p> <p>Short Stay – 1 per two five apartments*</p> <p>*deviation from these standards shall be at the discretion of the planning authority</p>	<p><b>CE Recommendation:</b></p> <p>To amend the following under 13.8.1 Bicycle Parking Design/Provision to: <i>'Bicycle parking/storage associated with residential apartments provided within the Draft Plan comply with the requirements of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities <b>as amended or updated</b> (the 'Apartment Guidelines') in relation to design and provision of facilities.'</i></p>
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Sustainable Movement		
Submission No.	Submission Summary	CE response and recommendation
<a href="#">SD-C195-205 Land Development Agency</a>	<p>The LDA in their submission welcome SDCC's approach to parking management standards, especially the application of maximum parking provision and more flexible rates for developments along public transport</p>	<p><b>CE Response</b></p> <p>The content of the submission is noted, the submission references <b>SM7 Objective 1</b> which states as follows;</p>

	<p>corridors, as set out in SM7 Objective 1 and detailed in Table 13.25 and Table 13.26.</p> <p>In order to assist in unlocking the full potential of brownfield/infill sites, supporting the compact growth and consolidation of the Dublin city and suburbs area, and align with the policy objectives set out in national and regional strategic aims to increase densities in public transport corridors, the LDA recommend in their submission the following amendments to the car parking zones set out under Section 13.8.2 of the Draft Development Plan, namely:</p> <p>that 400 metres be changed to 500 metres in order to provide consistency with the Sustainable Urban Housing Guidelines – Design Standards for New Apartments (as amended, December 2020):</p> <p>Zone 2 (Non-Residential): More restrictive rates for application within town and village centres, lands zoned REGEN, and brownfield/infill sites within Dublin city and suburbs settlement's boundary, within 800 metres of a train or Luas station and within 500 metres of a high quality bus service (including proposed services that have proceeded to construction).</p> <p>Zone 2 (Residential): More restrictive rates for application within town and villages centres, lands zoned REGEN, and brownfield/infill sites within Dublin city and suburbs settlement's boundary, within 500 metres of a high quality public transport service<sup>5</sup> (includes a train station, Luas station or bus stop with a high quality service).</p>	<p><i>'To implement maximum car parking standards for a range of land-use types, where provision is based on the level of public transport accessibility.'</i></p> <p>The submission requests the following amendments to Section 13.8.2</p> <p><i>In respect of car parking rates within Zone 2 Residential and Zone 2 Non-Residential areas as follows;</i></p> <p><i>From:</i></p> <p><b>Zone 2 (Non-Residential):</b> More restrictive rates for application within town and village centres, within 800 metres of a train or Luas station and within 400 metres of a high quality bus service (including proposed services that have proceeded construction).</p> <p><i>To:</i></p> <p><b>Zone 2 (Non Residential):</b> <i>More restrictive rates for application within town and village centres, lands zoned REGEN, and brownfield/infill sites within Dublin city and suburbs settlement's boundary within 800 metres of a train or Luas station and within 500 metres of a high quality bus service (including proposed services that have proceeded to construction).</i></p> <p><i>And</i></p> <p><b>Zone 2 (Residential):</b> <i>More restrictive rates for application within town and village centres, within 400 metres of a high quality public transport service<sup>5</sup> (includes a train station, Luas station or bus stop with a high quality service).</i></p> <p><i>To:</i></p> <p><b>Zone 2 (Residential):</b> <i>More restrictive rates for application within town and villages centres, lands zoned REGEN, and brownfield/infill sites within Dublin city and suburbs settlement's boundary'</i></p>
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		<p><i>within 500 metres of a high quality public transport service<sup>5</sup> (includes a train station, Luas station or bus stop with a high quality service).</i></p> <p>The submission states that the 500 metres is required to be amended to comply with the Sustainable Urban Housing Guidelines – Design Standards for New Apartments (as amended, December 2020).</p> <p>The guidelines refer to a range of between 400-500 metres and while the 400m requirement does comply with the provisions of the guidelines it is considered reasonable to amend this to provide a range 400-500m distance.</p> <p>In respect of the request to amend the areas to which the parking restrictions might apply to read as follows in respect of both residential and non- residential in zone 2. <i>application within town and village centres,, lands zoned REGEN, and brownfield/infill sites within Dublin city and suburbs settlement's boundary.</i> It is considered that the amendment is reasonable given the extent to brownfield and REGEN lands in the County.</p> <p><b>CE Recommendation</b></p> <p>Amend Section 13.8.2 of the Draft Development Plan as follows;</p> <p>From:</p> <p><i>Zone 2 (Non Residential): More restrictive rates for application within town and village centres, within 800 metres of a train or Luas station and within 400 metres of a high quality bus service (including proposed services that have proceeded to construction).</i></p> <p>To:</p> <p><i>Zone 2 (Non Residential): More restrictive rates for application within town village centres, lands zoned REGEN, and brownfield/infill sites within Dublin city and suburbs settlement's boundary within</i></p>
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		<p>800 metres of a train or Luas station and within <b>400-500 metres</b> of a high quality bus service (including proposed services that have proceeded to construction).</p> <p>And from:</p> <p><u>Zone 2 (Residential):</u> More restrictive rates for application within town and village centres, within 400 metres of a high quality public transport service<sup>5</sup> (includes a train station, Luas station or bus stop with a high quality service).</p> <p>To:</p> <p><u>Zone 2 (Residential):</u> More restrictive rates for application within town and villages centres, , <b>lands zoned REGEN, and brownfield/infill sites within Dublin city and suburbs settlement's boundary within 400- 500 metres</b> of a high quality public transport service<sup>5</sup> (includes a train station, Luas station or bus stop with a high quality service).</p>
SD-C195-133 CAIRN Plc	<p>It is submitted that EV charging points be restricted to apartment or mixed use/commercial developments where parking can be managed and that the provisions under Section 13.8.3 be amended to read as follows:</p> <p>"EV charging shall be provided in all apartment residential, mixed use and commercial development and shall comprise 15% - 20% 10% of the total parking spaces provided, with higher provision within this range required in urban areas"</p>	<p><b>CE Response</b></p> <p>As per S.I. No. 393/2021 - European Union (Energy Performance of Buildings) Regulations 2021 which defines the scope of these regulations, the 20% of the total parking spaces dedicated to EV charging applies to:</p> <ul style="list-style-type: none"> <li>a) A new building;</li> <li>b) An existing building (other than a dwelling);</li> <li>c) A building that is undergoing major renovation.</li> </ul> <p>Secondly, the EV usage levels specified in the Draft Plan will be amended from 15 to 20% within the first bullet point under Section 13.8.3 Car Parking/Charging for Electric Vehicles (EVs), as per the Statutory Instruments No. 393/2021_European Union (Energy Performance of Buildings) Regulations 2021.</p>

		<p>In addition, the second bullet point of Section 13.8.3 Car Parking/Charging for Electric Vehicles (EVs) of the Draft Plan should be amended in order to remove the wording 'as required'.</p> <p><b>CE Recommendation:</b></p> <p>As per response to Submission 181 and 245, to amend Section 13.8.3 Car Parking/Charging for Electric Vehicles (EVs) first bullet point to read:</p> <p>From:  <i>EV charging shall be provided in all residential, mixed use and commercial development and shall comprise 15% - 20% of the total parking spaces provided, with higher provision within this range required in urban areas.</i></p> <p>To:  <i>EV charging shall be provided in all residential, mixed use and commercial development and shall comprise <b>20%</b> of the total parking spaces provided, with higher provision within this range required in urban areas, <b>with the remainder of spaces to be future proofed.</b></i></p> <p><b>And to amend the section bullet point in same section to read:</b></p> <p>From:  <i>The remainder of the parking spaces should be constructed to be capable of accommodating future charging points, as required.</i></p> <p>To:  <i>The remainder of the parking spaces should be constructed to be capable of accommodating future charging points, <del>as required.</del></i></p>
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Energy Monitoring		
Submission No.	Submission Summary	CE response and recommendation
SD-C195-133 CAIRN Plc	<p>The submission welcomes the focus and prominence to addressing climate change within the Draft Plan but cautions against any overly prescriptive development standards linked to climate action. It is submitted that new standards, technologies and best practice in this area is constantly evolving and will likely continue to do so over the period of the plan and for this reason a flexible approach should be taken when setting any development standards around climate action. The submission requests that consideration be given to facilitating the use of new technologies, new construction methods and new materials as they become available and/or viable for use in schemes, which would allow developments to strive towards new best practice over the lifetime of the plan.</p>	<p><b>CE Response</b></p> <p>This submission is noted and acknowledged.</p> <p>The Council welcomes comments from Cairn Plc in relation to the focus on addressing climate change within the Draft Plan and understands that new standards, technologies and best practice are constantly evolving.</p> <p>The vision of the Energy chapter states:</p> <p>'Deliver a green society and circular economy <b>adaptable to new technologies</b>, a home and place of employment for people and industries striving towards reducing their carbon footprint'.</p> <p>The Council are open to adopting and improving on technologies used within the all sectors of the economy. As highlighted within Section 13.5.4 Residential Standards, a sub heading called Building Design states, that all new buildings during the design process shall incorporate sustainable technologies capable of achieving a Building Energy Rating in accordance with the provisions S.I. No. 666 of 2006 European Communities (Energy Performance of Buildings) Regulations, 2006.</p> <p>All planning developments are dealt with on their merits and the facilitation of new technologies, new construction methods and new materials are dealt with by the Development Management Team, who will be open to the integration of new technologies.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Plan.</p>

Chapter 13 Miscellaneous		
Submission No.	Submission Summary	CE response and recommendation
SD-C195-11 Proinsias Mac Fhlannchadha	Submission calls for SDCC to commit to maintaining a live 3D model of the built environment to aid in the greater understanding of how new developments will interact with the built environment.	<p><b>CE Response</b></p> <p>Council actively engages in innovating digital tools where beneficial to service provision. The Council is currently engaging in discussions with service providers in order to deliver a 3D platform to assist with plan making monitoring and decision making.</p> <p>However, this is not a matter for the County Development Plan.</p> <p><b>CE Recommendation</b></p> <p>No change to Draft Plan.</p>
SD-C195-213 An Taisce	An Taisce's submission notes that In the absence of rigorous application of policy, the divergence between policy and practice results in unsustainable, economically inefficient, structurally weak and spatially dispersed development patterns. Therefore, it is of paramount importance that the new CDP moves beyond objectives within the text and towards robust targets, actions and measures to achieve the tangible implementation of the plan's objectives and policies.	<p><b>CE Response</b></p> <p>The contents of this submission are noted and acknowledged.</p> <p>The Draft Plan has been prepared in accordance with the requirements set out in legislation under Part II Chapter I of the Planning and Development Act 2000 (as amended). In addition, the Draft Development Plan Guidelines (2021) or Draft Plan Guidelines once adopted which will supersede the 2007 Guidelines, are prescribed under Section 28 of the Act (Ministerial Guidelines) and contain Specific Planning Policy Requirements (SPPRs) which must be adhered to. In addition, this is the first Draft Development Plan for South Dublin County to be reviewed by the Office of the Planning Regulator and the powers conferred thereto under Part IIB of the Planning and Development Act 2000 (as amended).</p> <p>The Draft Plan contains a monitoring framework in chapter 13. This will be further to comply with the monitoring requirements of the Draft Development Plan Guidelines or Adopted Guidelines once</p>

		<p>they are issued by the Department of Housing, Local Government and Heritage.</p> <p><b>CE Recommendation</b></p> <p>No Change to Draft Plan.</p>
<p>SD-C195-265 Deirdre Tierney</p>	<p>Submission supports the good foundation for policies and objectives within the Draft CDP, commenting on how objectives and actions are progressing and what expected outcomes need to be stated. Recommendations include:</p> <ul style="list-style-type: none"> <li>- State within the Draft CDP what is new to the plan and what has been carried forward;</li> <li>- Updates on actions progress on an annual basis;</li> <li>- State where progress is show and recorded;</li> <li>- Actions should have a timeline, with the removal of the generic 'during the lifetime of this Plan'; and</li> <li>- Actions should have measurable outcomes.</li> </ul>	<p><b>CE Response</b></p> <p>The contents of this submission are noted and acknowledged.</p> <p>The Draft Plan has been prepared in accordance with the requirements set out in legislation under Part II Chapter I of the Planning and Development Act 2000 (as amended). In addition, the Draft Development Plan Guidelines (2021) or Draft Plan Guidelines once adopted which will supersede the 2007 Guidelines, are prescribed under Section 28 of the Act (Ministerial Guidelines) and contain Specific Planning Policy Requirements (SPPRs) which must be adhered to. In addition, this is the first Draft Development Plan for South Dublin County to be reviewed by the Office of the Planning Regulator and the powers conferred thereto under Part IIB of the Planning and Development Act 2000 (as amended).</p> <p>The Draft Plan contains a monitoring framework in chapter 13. This will be further to comply with the monitoring requirements of t the Draft Development Plan Guidelines or Adopted Guidelines once they are issued by the Department of Housing, Local Government and Heritage.</p> <p>It is not a matter for the Development Plan to include what is new to it and what has been carried forward other than in the Core Strategy. To do so would add unnecessarily to an already comprehensive document.</p> <p>The Monitoring Framework will be the basis for the statutory 2 year progress report on the Development Plan. Objectives in a Development Plan are relevant to the lifetime of the Plan.</p>

		<b>CE Recommendation</b> No Change to Draft Plan.
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# Environmental Reports

## Environmental Reports

SEA		
Submission No.	Submission Summary	CE response and recommendation
SD-C195-13 Environmental Protection Agency (EPA)	<p>The following submission was received from the Environmental Protection Agency (EPA) and is one of the statutory environmental authorities under the SEA Regulations. They state in their submission that their function does not include approving or enforcing SEAs or plans but focuses on reviewing and commenting on key sector plans. Attached within this document is a 'self service approach' guidance document called 'SEA of Local Authority Land Use Plans- EPA Recommendations and Resources'.</p> <p>&gt; The EPA suggests that South Dublin County council take this guidance document into account and incorporate the recommendations in finalising and implementing the Plan, along with ensuring that the Plan aligns with key relevant higher-level plans and programs and is consistent with the relevant objective and policy commitments of the National Planning Framework and the Eastern and Midlands Regional Spatial and Economic Strategy.</p> <p>&gt; The EPA states that the SEA regulations set out what should be contained in the environmental reports, highlight the following issues are key:</p> <ul style="list-style-type: none"> <li>- Assessment of Alternatives;</li> <li>- Assessment of Environmental Effects;</li> <li>- Mitigation Measures; and</li> <li>- Monitoring./</li> </ul> <p>&gt; It is stated that in finalising the Plan and integrating the findings of the SEA into the Plan, the recommendations, key</p>	<p><b>Response:</b></p> <p>The contents of this submission are noted and welcomed.</p> <p>The 'SEA of Local Authority Land Use Plans – EPA Recommendations and Resources' has been and will continue to be taken into account in finalising and implementing the South Dublin County Development Plan 2022-2028. The Plan will be consistent with relevant higher-level plans and with the NPF and EMRA RSES.</p> <p>All future amendments to the Plan for likely significant effects, will use the same method of assessment applied in the environmental assessment of the Draft Plan.</p> <p>An SEA statement will be prepared once the Draft Plan is adopted which will include all Environmental considerations, how environmental report, submissions, observations and consultations have been taken into account during the preparation of the Plan, the reasons for choosing the Plan adopted and the measure decided upon to monitor the significant environmental effects of implementation of the Plan.</p> <p><b>Recommendation:</b></p> <p>No change to the Draft Plan.</p>



	<p>issues and challenges described in the State of the Environment Report (EPA, 2020) should be considered as relevant and appropriate.</p> <p>&gt; It is suggested that any future amendments to the Plan for likely significant effects, using the same method of assessment applied in the environmental assessment of the plan.</p> <p>&gt; It is suggested that once the Plan is adopted, an SEA statement is prepared which includes all Environmental considerations, how environmental report, submissions, observations and consultations have been taken into account during the preparation of the Plan, the reasons for choosing the Plan adopted and the measure decided upon to monitor the significant environmental effects of implementation of the Plan.</p>	
SD-C195-41 Dara Larkin	<p>The following submission has stated that Section 10.1, first paragraph of the SEA Report of the Draft Development Plan 2022 – 2028 be amended to:</p> <p>'The Planning and Development Act 2000 (as amended) and the Planning and Development Regulations (as amended) requires that the Chief Executive of the Local Authority prepares a progress report on the implementation of the Plan which will include information in relation to progress on, and the results of, monitoring the significant environmental effects of implementation of the Development Plan.'</p>	<p><b>Response:</b></p> <p>This issue is noted and acknowledged.</p> <p>The submission reflects the need in legislation to include information in relation to progress on, and the results of, monitoring the significant environmental effects of implementation of the Development Plan in the 2 year progress report. The inclusion of the wording is considered reasonable</p> <p><b>Recommendation:</b></p> <p>Amend section 10.1, first paragraph of the SEA Report of the Draft Plan as follows:</p> <p>From:</p> <p>The Planning and Development Act 2000 (as amended) requires that the Chief Executive of the Local Authority prepares a progress report on the implementation of the Plan. Given the environment is a significant consideration then the progress report will include the</p>

		<p>key findings of the environmental monitoring programme as outlined in this chapter of the SEA Environmental Report.</p> <p>To:</p> <p>The Planning and Development Act 2000 (as amended) <b>and the Planning and Development Regulations (as amended)</b> requires that the Chief Executive of the Local Authority prepares a progress report on the implementation of the Plan, <b>which will include information in relation to progress on, and the results of, monitoring the significant environmental effects of implementation of the Development Plan.</b> Given the environment is a significant consideration then the progress report will include the key findings of the environmental monitoring programme as outlined in this chapter of the SEA Environmental Report.</p>
<p>SD-C195-41 Dara Larkin</p>	<p>The following submission has stated Section 13.11.3 second paragraph of the Draft Development Plan 2022 – 2028 be amended to;</p> <p>“The framework will form an important evidence-based input and integrate with the review process of the subsequent County Development Plan 2028 – 2034. This framework is also designed to assist the Planning Authority in preparing reports in meeting its statutory requirements, including:</p> <ul style="list-style-type: none"> <li>- The 2 Year Review of the 2022 – 2028 County Development Plan (which will include information in relation to progress on, and the results of, monitoring the significant environmental effects of implementation of the Development Plan).</li> <li>- Report to the Regional Assembly setting out progress made in supporting objectives of the RSES.”</li> </ul>	<p><b>Response:</b></p> <p>This issue is noted and acknowledged.</p> <p>Section 13.11.3 sets out monitoring for the plan. The proposed new wording recognizes that monitoring of one plan forms a base for the preparation of the next plan. It also includes text on the statutory requirements of the 2 year progress report.</p> <p>It is considered that the wording is appropriate and reflects an important part of the purpose of the monitoring set out in the Draft Plan.</p> <p><b>Recommendation:</b></p> <p>Amend section 13.11.3 of the Draft Plan from:</p> <p>The framework will form an important evidence-based input and integrate with the review process of the subsequent County Development Plan 2028 – 2034. This framework is also designed to assist the Planning Authority in preparing reports in meeting its statutory requirements, including:</p>

		<ul style="list-style-type: none"> <li>- The 2 Year Review of the 2022 – 2028 County Development Plan.</li> <li>- Report to the Regional Assembly setting out progress made in supporting objectives of the RSES</li> </ul> <p>To</p> <p>The framework will form an important evidence-based input and integrate with the review process of the subsequent County Development Plan 2028 – 2034. This framework is also designed to assist the Planning Authority in preparing reports in meeting its statutory requirements, including:</p> <ul style="list-style-type: none"> <li>- The 2 Year Review of the 2022 – 2028 County Development Plan (which will include information in relation to progress on, and the results of, monitoring the significant environmental effects of implementation of the Development Plan).</li> <li>- Report to the Regional Assembly setting out progress made in supporting objectives of the RSES</li> </ul>
SD-C195-213 An Taisce	<p>An Taisce notes that the Council has a legal obligation to ensure that the Strategic Environmental Assessment (SEA) process is robust, effective, and identifies all likely significant effects on the environment under the range of considerations set out in the Annexes to the SEA Directive. Therefore, a general policy or land use zoning should not be maintained where likely significant effects on the environment are identified. An Taisce highlights Article 10 of the Directive, which sets out the provisions for the monitoring of a programme subject to SEA and the obligation for remedial action where unforeseen adverse effects arise. The submission notes that Article 10 applies not just to monitoring but also to the remediation of unforeseen negative effects. The Council should therefore ensure that monitoring of significant environmental effects is</p>	<p><b>Response:</b></p> <p>The contents of the submission are noted.</p> <p>Section 13.11.4 Environmental Monitoring states that Article 10 of the Strategic Environmental Assessment Directive requires monitoring of the significant environmental effects of the implementation of the County Development Plan in order to identify, at an early stage, unforeseen adverse effects and to enable appropriate remedial action to be undertaken.</p> <p>The Council will ensure that monitoring of significant environmental effects are carried out as part of the Draft Plan and will be monitored throughout the lifetime of the Draft Plan.</p> <p><b>Recommendation:</b></p>

	carried out and that any unforeseen adverse impacts that arise are remediated.	No change to the Draft Plan
SD-C195-234 Development Applications Unit	The submission from the DHLGH notes and appreciates that the Draft Plan had an Strategic Environmental Assessment and Appropriate Assessment carried out in accordance with proper legislation and that the plan is focused on the development of brownfield rather than green field sites, thereby helping to avoid detrimental impacts on ecologically important sites.	<p><b>Response:</b></p> <p>The submission is noted and welcomes comments on this matter from the Department of Housing, Local government and Heritage on the SEA and AA process.</p> <p><b>Recommendation:</b></p> <p>No change to the Draft Plan.</p>

SFRA		
Submission No.	Submission Summary	CE response and recommendation
SD-C195-33 Office of Public Works  SD-C195-225 An Claiomh Glas	<p>This submission acknowledges that National Indicative Fluvial Mapping outputs were not available at the time of the CDP, but states these are now available to Local Authorities, improving on the PFRA mapping, though still indicative.</p> <p>An Claiomh Glas (Environmental NGO) are supportive of the submission from the OPW</p>	<p><b>Response:</b></p> <p>The submission is noted and acknowledged.</p> <p>National Indicative Fluvial Mapping has been reviewed within the subject area. The only flood extents identified in the NIFM mapping within the study area is in the vicinity of the Robin hood stream at Bluebell. However, the flooding in this area is already considered in the detailed hydraulic modelling undertaken as part of the CFRAMS. No modifications to the SFRA mapping are necessary as a result of the NIFM information.</p> <p><b>Recommendation:</b></p> <p>No change to the Draft Plan.</p>
SD-C195-33 Office of Public Works	The submission welcomes CA objectives 1-3 regarding collaboration with the EMRA, the relevant CARO, Codema and SEAR to achieve climate action policies and objectives. It also welcomes the discussions on climate change in the SFRA and in particular the consideration of future scenarios	<p><b>Response:</b></p> <p>This issue is noted and welcomes comments from the OPW on this matter.</p>

<p>SD-C195-225 An Claiomh Glas</p>	<p>when assessing flood risk, however, this is focused on incorporating climate change into development design and the Draft Plan has not addressed how climate change has been considered in the production of the development plan. Consideration may be given to policy and objectives in relation to climate change and flood risk.</p> <p>An Claiomh Glas (Environmental NGO) are supportive of the submission from the OPW</p>	<p>Climate change has played major role in the formation of the Draft Plan. Section 1.8 Climate Action and Section 1.9 Climate Action and the Role of the Development Plan, identifies how climate change has been considered in the production of the Draft Plan, with Policy CA1: Climate Action and its objectives aiming to achieve a lower carbon society throughout the lifetime of the Development Plan.</p> <p>Overall, climate action has been a fundamental consideration, guiding objectives and policy formation throughout the Draft Plan and the SFRA.</p> <p><b>Recommendation:</b></p> <p>No change to the Draft Plan.</p>
<p>SD-C195-33 Office of Public Works</p> <p>SD-C195-225 An Claiomh Glas</p>	<p>This submission notes IE4 objective 3 to support and cooperate with the OPW in delivering the relevant CFRAM programme. The CFRAM programme was completed in 2018. The OPW recommends the text of this objective be updated to refer to delivery of measures set out in the relevant Flood Risk Management Plan.</p> <p>An Claiomh Glas (Environmental NGO) are supportive of the submission from the OPW</p>	<p><b>Response:</b></p> <p>This issue is noted and acknowledged.</p> <p>South Dublin welcomes this comment from the OPW and will update the text for IE4 Objective 3 to refer to the delivery of measures set out in the relevant Flood Risk Management Plan.</p> <p><b>Recommendation:</b></p> <p>It is recommended to amend IE Objective 3 as follows:</p> <p>From:</p> <p>To continue to support and co-operate with the Office of Public Works in delivering the relevant Catchment-Based Flood Risk Assessment and Management Programme.</p> <p>To</p>

		To continue to support and co-operate with the Office of Public Works in delivering measures set out in in the relevant Flood Risk Management Plan.
<a href="#">SD-C195-33 Office of Public Works</a>  <a href="#">SD-C195-225 An Claiomh Glas</a>	<p>Submission notes the inclusion of a single Plan Making Justification Test in the SFRA covering the entire county, however, this is not consistent with the Guidelines. Packages of land in flood risk areas which allow for vulnerable development should be considered on a case by case basis.</p> <p>The submission relates to Sheet Maps for Lucan, Grange Castle/Baldonnel, Clondalkin/Naas Road, Rathfarnham, Rathcoole/Newcastle, Rathcoole/Citywest, Tallaght and Ballyboden and states highly vulnerable development is not appropriate in Flood Zone A and B unless a Plan-making Justification Test regarding the specific zoning, completed by the Local Authority, can be satisfied.</p> <p>An Claiomh Glas (Environmental NGO) are supportive of the submission from the OPW</p>	<p><b>Response:</b></p> <p>This issue is noted and acknowledged.</p> <p>South Dublin have engaged with the SFRA consultants to complete justification tests as part of the Draft Plan which are consistent with the guidelines.</p> <p>The justification test section of the SFRA has been updated with individual tests undertaken for discreet undeveloped at risk areas. These areas include: Clondalkin, Jobstown / Killinarden, Rathfarnham, Kimmage / Templeogue, Lucan, New Nangor Road &amp; Naas Road, Greenogue, Clondalkin, Lucan, New Nangor Road &amp; Naas Road, Aungierstown and Ballybane Lands - Grange Castle, Ballycullen &amp; Oldcourt, Clonburris and Fortunestown. Developed areas have been considered with regard to their proposed zonings.</p> <p><b>Recommendation:</b></p> <p>Amend the Draft Plan Strategic Flood Risk Assessment as set out in Appendix 4 of the CE Report.</p>
<a href="#">SD-C195-33 Office of Public Works</a>  <a href="#">SD-C195-225 An Claiomh Glas</a>	<p>This submission states that in Appendix 2 Schedule 1 is wrong listing Flood Zone A as a 10% AEP event, Flood Zone B as 1%, and Flood Zone C as 0.1%. These flood zones are defined as in Section 2.4 of the SFRA whereby Flood Zone A is greater than 1% AEP for fluvial, or 0.5% for coastal, Flood Zone B is between 1% for fluvial or 0.5% for coastal and 0.1%, and Flood Zone C is less than 0.1%.</p>	<p><b>Response:</b></p> <p>This issue is noted and acknowledged.</p> <p>Appendix 2 Part 1 has listed Flood Zone A, B and C is incorrect and will require amendment in the Draft Plan. Section 2.4 of the SFRA will be used to amend the appendix.</p> <p><b>Recommendation:</b></p>

	<p><input type="checkbox"/> An Claiomh Glas (Environmental NGO) are supportive of the submission from the OPW</p>	<p>The following amendment is required to the Draft Plan: Appendix 2 Part 1, Page 40 Section Drainage (SuDS) and Flood Risk Criteria. Under Definitions change as follows:</p> <p><b>From:</b></p> <p>Flood Zone A - High Probability flood events have approximately a 1-in-a-10 chance of occurring or being exceeded in any given year.</p> <p>Flood Zone B - Medium Probability flood events have approximately a 1-in-a-100 chance of occurring or being exceeded in any given year.</p> <p>Flood Zone C - Low Probability flood events have an indicative 1-in-a-1000 chance of occurring or being exceeded in any given year.</p> <p><b>To:</b></p> <p>Flood Zone A where the probability of flooding from rivers and the sea is highest (greater than 1% or 1 in 100 for river flooding)</p> <p>Flood Zone B where the probability of flooding from rivers is moderate (between 0.1% or 1 in 1000 and 1% or 1 in 100 for river flooding)</p> <p>Flood Zone C where the probability of flooding from rivers is low (less than 0.1% or 1 in 1000 for river flooding).</p> <p>Flood Zone C covers all plan areas which are not in zones A or B.</p>
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## Miscellaneous

Operational Issues		
Submission No.	Submission Summary	CE response and recommendation
<a href="#">SD-C195-24 Liam Doran</a>	The submission sets out that the Council should stop acting like a private company and should stop calling us customers, we're citizens.	<p>CE Response:</p> <p>The content of the submission is noted. However, the Council provides a variety of services and, therefore, the term customer is not only relevant to a private sector context. The Council interacts with citizens, businesses, groups, etc. and, therefore this term allows to encompass all.</p> <p>In addition, it should be noted that the Development Plan uses the word citizens throughout and does not refer to the term customers.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Development Plan.</p>
<a href="#">SD-C195-225 An Claiomh Glas</a>	The submission outlines the groups frustration with the consultation portal and considers that email submissions should be accepted and that all public participation in the planning process should be free of charge.	<p>CE Response:</p> <p>The content of the submission is noted, however, considering the volumes of submission anticipated, the portal is the most efficient platform to comprehensively address all submissions. The portal is used widely by Local Authorities and Government bodies during Public Consultation.</p> <p>Any submission can be lodged at the Planning Desk in the County Hall as well. All services with regards to the Draft Plan's public consultation are free of charge. Where charges are applicable to other planning matters this is in accordance with relevant planning legislation.</p> <p><b>CE Recommendation:</b></p> <p>No change to the Draft Development Plan.</p>



