



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

Chief Executive's Report

Public Consultation on Proposed Material Amendments and Environmental Reports

23rd May 2022

Land Use Planning & Transportation Department

This Chief Executive's report is provided to the Members in response to the submissions received during the consultation period on the Material Amendments to the South Dublin County Draft Development Plan 2022-2028 as required under section 12(8) of the Planning and Development Act 2000 (as amended).

A handwritten signature in black ink, consisting of several overlapping loops and a horizontal line at the bottom, positioned above a solid horizontal line.

Daniel McLoughlin
Chief Executive South Dublin County Council

TABLE OF CONTENTS

SECTION 1 - Introduction and Background	4
Purpose of the Chief Executive's Report.....	4
Material Amendments to the Draft County Development Plan.....	4
Public Consultation	5
Brief Overview of Submissions and Chief Executive's Recommendations.....	6
Structure of Section 2 - Submission Summaries, CE's Response and Recommendation	7
Role of the Office of the Planning Regulator (OPR).....	8
SECTION 2 - Submission Summaries, Chief Executive's Response and Recommendation	10
Submission of the Office of the Planning Regulator and the Chief Executive's Response and Recommendations to same.....	10
Chapter 2 – Core Strategy and Settlement Strategy.....	27
Chapter 3 – Natural, Cultural and Built Heritage	109
Chapter 4 – Green Infrastructure	126
Chapter 5 - Quality Design and Healthy Placemaking	137
Chapter 6 – Housing.....	142
Chapter 7 – Sustainable Movement	153
Chapter 8 – Community Infrastructure and Open Space	173
Chapter 9 – Economic Development and Employment	202
Chapter 10 - Energy	220
Chapter 11 – Infrastructure and Environmental Services	224
Chapter 13 – Implementation and Monitoring	231
Environmental Reports.....	257
List of Submitters and types of submitters with assigned reference numbers.....	260
SECTION 3 – Supplementary Documents	263
Part 1 Environmental Assessments of Recommended Minor Modifications to Proposed Amendments	263
Part 2 Material Amendment Maps.....	276

SECTION 1 - Introduction and Background

Purpose of the Chief Executive's Report

Introduction

This Chief Executive's Report is submitted to the Members of South Dublin County Council for their consideration as part of the process for the preparation of the County Development Plan 2022-2028. The Report forms part of the statutory procedure for the preparation of a County Development Plan, as required by Section 12(8) of the Planning and Development Act, 2000 (as amended) [hereafter referred to as The Act] and sets out to:

List the persons or bodies who made submissions or observations under this section, that is, during the public consultation period of the Proposed Amendments to the Draft County Development Plan 2022 - 2028 and the Draft Environmental Report and Natura Impact Report

Summarise the recommendations, submissions and observations made by the Office of the Planning Regulator, and the submissions and observations made by any other persons in relation to the proposed amendments

Give the response of the Chief Executive to the issues raised, taking account of any directions of the Members of the authority under Section 11(4)(d) of the Act, the proper planning and sustainable development of the area, the statutory obligations of any Local Authority in the area and any relevant policies or objectives in the area and any relevant policies or objectives of the Government or of any Minister of the Government.

Material Amendments to the Draft County Development Plan

At the special Council meetings held in March 2022 as per Section 12 (6) the Elected Members amended the Draft Plan. As per Section 12 (7) of the Act, it is the proposed amendments and the associated environmental reports and determinations that were on display from 29th March 2022 to 26th April 2022. Section 12 (7) of the Act invites submissions on the amendments and section 12 (8) sets out that the Chief Executive shall prepare a report on the submissions received "in relation to the Draft Plan in accordance with this section", which is taken to mean submissions in relations to the proposed amendments to the Draft Plan. Therefore, the responses and recommendations set out below, in Part 2 of this Report, relate to issues raised on the proposed amendments.

Members have a period of 6 weeks from the date of receipt to consider the Chief Executive's Report. Following consideration of the Proposed Amendments to the Draft Development Plan and the Chief Executive's Report, the Members shall, by resolution, having considered the proposed amendments and the Chief Executive's Report, make the Plan with or without the proposed amendments, except that where they decide to accept the proposed amendment, they may do so subject to any modifications to the amendment as they consider appropriate subject to Section 12(10) (c) of the Planning and Development Act 2000 (as amended), which states:

"(c) A further modification to the alteration –

- (i) may be made where it is minor in nature and therefore not likely to have significant effects on the environment or adversely affect the integrity of a European site,*
- (ii) shall not be made where it relates to –*

- (I) an increase in the area of land zoned for any purpose, or
- (II) an addition to or deletion from the record of Protected Structures”.

The Development Plan shall have effect 6 weeks from the day that the Plan is made.

Section 12(11) of the Planning and Development Act 2000 (as amended) states:

“In making the Development Plan under subsection (6) or (10), the members shall be 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.”

Public Consultation

The Proposed Amendments to the Draft County Development Plan 2022-2028 and Draft Environmental Reports were put on public display for 4 weeks between 29th March 2022 and 26th April 2022. Written submissions and / or observations, with respect to the Proposed Amendments to the Draft Plan only, were invited during the consultation period ending the 26th April 2022.

The public consultation was advertised as follows:

- A detailed public notice was placed in the *Irish Times* on 29th March 2022 advising of the consultation period, where the Draft Plan could be accessed and inviting submissions on the amendments to the Draft Plan up to and including the closing date of 26th April 2022. The same notice was placed in the *Echo* newspaper during the same week.
- A social media campaign was also run during the consultation period to raise awareness of the proposed Material Alterations.
- The proposed Material Alterations, the SEA and AA Determinations, the SEA Environmental Report and the AA Natura Impact Report were available for public inspection during the consultation period on:
 - The Online Portal at <https://consult.sdublincoco.ie/en/consultation/>
 - The Council’s dedicated website www.sdcc.ie/en/devplan2022, and
 - at the following locations:
 - At both the Tallaght Civic Offices (during normal opening hours) and Clondalkin Civic Offices (by appointment).
 - At the following libraries throughout the County:
 - County Library, Tallaght
 - Ballyroan Library
 - Clondalkin Library
 - Lucan Library
 - North Clondalkin Library
- The public were encouraged to meet staff in person at Tallaght Civic Offices and at Clondalkin Civic offices by appointment during the entire public consultation period.
- Submissions/observations in respect of the Draft Plan/Draft Environmental Report and Natura Impact Report were accommodated via hard copy or via the consultation portal.

Brief Overview of Submissions and Chief Executive's Recommendations

Of the 84 submissions and observations received during the prescribed public consultation period, a total of 116 issues were raised in relation to 89 of the total of 191 proposed Material Amendments. 3 issues were identified in relation to the Environmental Reports.

A further 9 submissions raised issues which were identified as matters not immediately relevant to the proposed Material Alterations and, pursuant to Sections 12(9) and 12(10) of the Planning and Development Act 2000 (as amended), cannot be considered at this stage of the plan making process.

Table 2 below sets out the number of times that issues were raised in submissions in relation to each of the proposed Material Alterations / Environmental Reports. Part 2 of the report provides the summaries, responses and recommendations of the CE in relation to the issues raised

Table 1: Submissions Overview

Total Number of registered submissions:	84
Total Number of Issues identified:	116

Table 2: Breakdown of Issues

Breakdown of issues		
Category	Issues Raised	% of Total
Chapter 1: Introduction, Strategic Vision and Climate Action	0	0
Chapter 2: Core Strategy and Settlement Strategy	30	25.86
Chapter 3: Natural, Cultural and Built Heritage	11	9.48
Chapter 4: Green Infrastructure	7	6.03
Chapter 5: Quality Design and Healthy Placemaking	5	4.31
Chapter 6: Housing	3	2.59
Chapter 7: Sustainable Movement	14	12.07
Chapter 8: Community Infrastructure and Open Space	19	16.38
Chapter 9: Economic Development and Employment	10	8.62
Chapter 10: Energy	3	2.59
Chapter 11: Infrastructure and Environmental Services	5	4.31
Chapter 12: Our Neighbourhoods	0	0
Chapter 13: Implementation and Monitoring	6	5.17
Environmental Reports	3	2.59
Total:	116	

Structure of Section 2 - Submission Summaries, CE's Response and Recommendation

The following is an overview of how the Material Amendments, submission summaries and Chief Executive's responses and recommendations are presented within this report.

Summary

In summary, this report recommends that the Development Plan:

be made with 170 of the proposed Material Alterations as displayed;

be made with 13 of the proposed Material Alterations as displayed subject to modification;

be made without 8 of the proposed Material Alterations as displayed

Format

- Each Amendment, that was the subject of the Public Consultation and subject to issues being raised in the submissions, is laid out under the relevant chapter as it features within the Draft Plan, in Part 2 of this report. The relevant summarised issues, the relevant reference number for each submitter, the Chief Executive's Response and Recommendation are placed under each individual Amendment. Note: Only Amendments that were the subject of issues being raised within the 84 submissions feature in Part 2 of this report.
- Where the report references an amendment in the body of the Chief Executive's response and recommendation, the proposed amendment is shown as per the amendment as displayed on the online Portal as part of the Public Consultation. For example, the original Amendment showed text additions to the Plan set out in **green type**, deletions to the text shown in ~~red print with a strikethrough~~. Where the Chief Executive makes a recommendation for a further modification, which is minor in nature, this is shown in the recommendation section in **black bold** (for insertions) or ~~bold strikethrough~~ (for text omissions). Recommendations may also include the omission of an amendment.
- Ninety-five of the overall total of 191 Amendments, which were placed on public display, were not subject to submissions or observations and are not affected by the Chief Executive's recommendations.
- The list of submitters is included at the end of Section 2

Note: Section 3 provides for supplementary documents relating to the CE Report. Section 3 Part 1 – provides details of the Environmental Assessments of Recommended Modifications to Proposed Amendments and Section 3 Part 2 – provides details of Material Amendment Maps for reference purposes.

In order to make the document as user friendly as possible the issues raised have been grouped under the relevant Material Amendment number, which has been replicated in full, and arranged under each Chapter heading as set out in the Draft Plan. Issues raised that refer to material or subject matter that was not included in the 'Proposed Amendments' document are shown at the end of each relevant section under the title 'Non Amendment Issues'.

In some instances, the submitter has incorrectly linked an issue to a proposed amendment. Whilst this is covered in the relevant section with the proposed amendment number noted, the fact that it does not relate to the amendment is set out in the response.

Role of the Office of the Planning Regulator (OPR)

In accordance with Sections 31AM and 31AO of the Act, the OPR has responsibility for independently assessing all Development Plans with a view to ensuring that the plan provides for the proper planning and sustainable development of the area concerned.

Matters assessed and evaluated under Section 31 (AM) include:

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

Section 31 (AM) 6 sets out that the Planning Authority shall notify the Office within 5 working days of the making of a Development Plan and send a copy of the written statement and maps as duly made and where the Planning Authority

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

Section 31(AM)(7) sets out that the OPR shall consider whether or not the Development Plan as made is, in the Office's opinion, consistent with any recommendations made by the Office.

Section 31 (AM) (8) sets out that where the Office is of the opinion that —

- (a) the Development Plan has not been made in a manner consistent with the recommendations of the Office,
- (b) that the decision of the Planning Authority concerned results in the making of a Development Plan in a manner that fails to set out an overall strategy for the proper planning and sustainable development of the area concerned, and
- (c) as a consequence of paragraphs (a) and (b), the use by the Minister of his or her functions to issue a direction under Section 31 would be merited, then the Office shall issue, no later than 4 weeks after the Development Plan is made, a notice to the Minister containing —
 - recommendations that the Minister exercise his or her function to take such steps as to rectify the matter in a manner that, in the opinion of the Office, will ensure that the Development Plan, sets out an overall strategy for proper planning and sustainable development, and
 - a proposed draft of a direction.

Section 31(AN) sets out the process which the Minister must follow in relation to any recommendation from the OPR to issue a direction under Section 31. Where the Minister does not agree with the Office, then the Minister shall —(i) prepare a statement in writing of his or her reasons for not agreeing, and (ii) cause that statement to be laid before each House of the Oireachtas.

Section 31 (3) and (4) sets out that before issuing direction the minister shall issue a notice informing the Planning Authority of the intention to issue a direction, a draft of which shall be contained in the notice to the Planning Authority, to take certain measures specified in the notice in order to ensure

that the plan is in compliance with the requirements of the Act and sets out an overall strategy for the proper planning and sustainable development of the area.

Any parts of the plan that by virtue of the issuing of the notice under this subsection shall be taken not to have come into effect.

If applicable, the notice can require the Planning Authority to take measures specified in the notice to ensure that the plan is in compliance with the transport strategy of the Dublin Transport Authority.

Not later than 2 weeks after receipt of the notice issued by the Minister the Planning Authority shall publish notice of the draft direction in at least one newspaper circulating in the area of the Development Plan or Local Area Plan, as the case may be, which shall state —

- (a) the reasons for the draft direction,
- (b) that a copy of the draft direction may be inspected at such place or places as are specified in the notice during such period as may be so stated (being a period of not more than 2 weeks), and
- (c) that written submissions or observations in respect of the draft direction may be made to the Planning Authority during such period and shall be taken into consideration by the Office of the Planning Regulator before it makes a recommendation to the Minister on the matter.

Following that period, the Chief Executive has 4 weeks to prepare a report on any submissions or observations received which shall be furnished to the Elected Members of the Planning Authority, the Office of the Planning Regulator and the Minister.

The report shall make recommendations in relation to the best way to give effect to the draft direction.

The Elected Members of the Planning Authority —

- (a) may make a submission to the Office of the Planning Regulator at any time up to the expiry of the display period of the draft Direction
- (b) where so submitted, shall send a copy of it to the Minister.

The OPR then consider the report of the Chief Executive, together with any submission made under and recommend to the Minister that he or she issue the direction with or without minor amendments.

SECTION 2 - Submission Summaries, Chief Executive’s Response and Recommendation

Submission of the Office of the Planning Regulator and the Chief Executive’s Response and Recommendations to same.

Introduction and Overview		
Submission No.	Submission Summary	CE Response and Recommendation
SD-C226-65	<p>Introduction:</p> <p>The submission of the Office of the Planning Regulator reiterated that it considered the Draft Plan to be generally consistent with policies in the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly area, and had recommended changes to enhance its alignment with national and regional policies in the aforementioned, and for consistency with, amongst others the <i>Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities (2020)</i>, <i>The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)</i>, and <i>Development Plans Guidelines for Planning Authorities - Draft for Consultation (2021)</i>.</p> <p>The submission sets out that the 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.</p> <p>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. In this regard the</p>	<p>CE Response:</p> <p>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.</p>

	<p>planning authority is requested by the Office to action an observation.</p> <p>It is further stated that a submission can also 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.</p> <p>Overview:</p> <p>The Office welcomes many of the changes proposed as material amendments to the Draft Plan in particular the revised Housing Supply Target figures for the 6-year plan period and consequential revisions to the core strategy tables, the approach to moderate and phase the future growth of Rathcoole and Newcastle and changes to ensure consistency with Part V of the Act.</p> <p>The offices submission to the Draft Plan also welcomed the evidence-based approach that informed the employment strategy in the Draft Plan and acknowledged that the policy and objectives for employment land reflected the guiding principles of the RSES and were consistent with RPO 4.3 in particular.</p> <p>The Office generally considers the majority of the proposed material amendments to be reasonable and evidence based but has identified a number of instances where further modification is required to enhance alignment with national and regional policy objectives or section 28 Ministerial Guidelines.</p> <p>In particular the office considers that the proposal to rezone significant further lands for employment at Greenogue Business Park in an area that is poorly served by public transport is not consistent with the objectives of sustainable mobility and transition to a low carbon and climate resilient society and would set a further precedent for this pattern of development in the general area.</p> <p>The Office also considers that the material amendment to make data centres a 'not permitted' use across all land use zones represents an unconditional policy approach for which no clear evidence-based rationale is evident, and which is not consistent with the regional policy objectives for economic development in the RSES.</p>	
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	Within the context of the above the Office make 3 recommendations and 3 observations.	
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Observation 1 – Material Amendment 2.1		
Submission No.	Submission Summary	CE Response and Recommendation
SD-C226-65	<p>The Office welcomes the clarity provided in the revised core strategy tables and reduced allocations provided to the Self-Sustaining Growth Towns of Rathcoole and Newcastle. In regard to the Office’s previous submission on the Draft Plan relating to Saggart, the rationale relating to the development of this area alongside the specific local objective and the intent to prepare a local area plan for the settlement is noted.</p> <p>While the above should be noted the Office highlight that the percentage of 13% in section 2.7.2 (page 70) differs slightly from the percentage figure in the Core Strategy table 11 regarding the population growth over the plan period.</p> <p><u>Material Amendment Observation 1 - Saggart</u> The planning authority is requested to review the percentage population growth figures for the plan period for Saggart to ensure that the text in section 2.7.2 (page 70) is consistent with the core strategy Table 11. The planning authority is also advised that Table 9 indicates available residential land of 5.77 ha while Table 11 has a lower figure of 5.57 ha.</p>	<p>CE Response: The points raised by the Office are noted in regard to the text in section 2.7.2 and Tables 9 and 11. In this regard the following should be noted:</p> <p>Table 9 of the Plan relates to the capacity of undeveloped lands within the South Dublin while Table 11, the Core Strategy Table (previously Table 10 in the Draft Plan) details the target level of growth over the plan period aligned with National and Regional Population Growth and the ESRI Housing Supply Targets set for the County.</p> <p>As set out in the Draft Plan, 93% of the County’s allocated growth is located within Dublin City and Suburbs with approximately half of these lands identified as brownfield lands. Such lands can present challenges from a delivery perspective due to numerous factors including site contamination, landownership, site assembly, phasing and sequencing. The County therefore has an excess of zoned land which is required to deliver the supply targets set out in the Core Strategy Table 11 (Table 10 in the Draft Plan) facilitating choice in sites that come forward and recognising that not all sites may be available within the plan period.</p> <p>As set out in section 2.6.7 Monitoring of Growth / Active Land Management of the Draft Plan, the Core Strategy aims to strike a balance between having a physical</p>

		<p>excess of zoned lands and being able to deliver new development to meet the needs of citizens.</p> <p>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 the objectives CS3 Objectives 1-6.</p> <p>With specific reference to the settlement of Saggart the figure 5.77ha relates to the extent of identified residential greenfield lands only. However, the total land capacity for the settlement is 7.17ha which is made up of residential greenfield/brownfield lands and Mixed Use greenfield/brownfield Lands. The targeted level of growth for the settlement is then set out in Table 11 where a land allocation of 5.57ha has been set to achieve a growth target of 165 units providing for c. 454 people.</p> <p>In regard to the text set out in section 2.7.2b a growth rate of 454 people represents an increase of c. 14% on the 2016 population for the settlement and the Office is correct in highlighting that the percentage referenced in this section should be modified to reflect that the level of growth is not 13% but 14% as set out in Core Strategy Table 11.</p> <p>CE Recommendation:</p>
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		<p>A minor modification to the text under section 2.7.2b as follows:</p> <p>From: The Saggart settlement had a population in 2016 of 3,133 which is targeted to grow by 366 454 persons (11%)(13%) to 3,4993,587 persons by 2028. Taking this growth over the plan period alongside estimated growth between 2017 and Q3 2022 of 244 people this equates to an overall growth of 698 (22%) persons over the period 2017 to 2028</p> <p>To: The Saggart settlement had a population in 2016 of 3,133 which is targeted to grow by 366 454 persons (11%)(13%) to 3,4993,587 persons by 2028. Taking this growth over the plan period alongside estimated growth between 2017 and Q3 2022 of 244 people this equates to an overall growth of 698 (22%) persons over the period 2017 to 2028</p>
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Observation 2 – Material Amendment 2.1

Submission No.	Submission Summary	CE Response and Recommendation
SD-C226-65	<p>In regard to recommendation 2 the Office notes that the CE’s report states ‘The average density provided within Dublin City and Suburbs is 40-50 units per ha while the settlements outside this provide for c. 35 units/ha. It is considered that the above density figures should be referenced in the Core Strategy’.</p> <p><u>Material Observation 2 – Core Strategy Table 11</u> Having regard to the example Core Strategy Table in the appendix to the Development Plans, Guidelines for Planning Authorities - Draft for Consultation (2021), the planning authority is requested to include a footnote as a minor modification to Table 11 – Core Strategy Table to reference that the land area figures for neighbourhoods inside and</p>	<p>CE Response: The observation and request for a reference in the Core Strategy Table which states that the land area figures for neighbourhoods inside and outside the Dublin City and Suburbs area are based on average densities of 40-50 units per hectare and 35 units per hectare respectively is considered reasonable and to be minor in nature.</p> <p>CE Recommendation: A minor modification to Table 11 Core Strategy to include a footnote to the bottom of the table which details the following:</p>

	<p>outside the Dublin City and Suburbs area are based on average densities of 40-50 units per hectare and 35 units per hectare respectively.</p>	<p><i>*Note the density figures set out in table 11 provide for an average density of 40-50 units per hectare within Dublin City and Suburbs and a density of 30-35 units per hectare outside of the City and Suburbs.</i></p>
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Recommendation 1 – Material Amendment 2.20		
Submission No.	Submission Summary	CE Response and Recommendation
<p>SD-C226-65</p>	<p>The Office notes that Material Amendment 2.20 proposes to rezone more than 50 hectares of land from Rural RU to Enterprise and Employment adjoining Greenogue Business Park. This is supported by Material Amendment 9.4 which introduces a specific local objective ‘to ensure development on lands within Greenogue Business Park will be subject to site specific flood alleviation measures forming part of any future planning application for these lands’ as the lands are affected by flood zones A / B.</p> <p>Having regard to the Draft Guidelines the Office consider that there is no evidential basis or strategic justification to support the rezoning of these lands for a significant quantum of additional Enterprise and Employment uses.</p> <p>In addition the Office highlights the location of the subject lands and the lack of public transport servicing these lands which is at variance with the clear framework for sustainable transport patterns referencing RPO 5.3 (MASP Sustainable Transport) which states that <i>‘future development within the Dublin Metropolitan Area shall be 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 attractive street environment for pedestrians and cyclists’.</i></p>	<p>CE Response:</p> <p>Amendment 2.20 arose on foot of Motion 28 (Item ID: 73862) which put forward a proposal to rezone lands north of Greenogue Industrial Estate from ‘RU’ Rural to ‘EE’ Enterprise and Employment. This proposed amendment was agreed by the Elected Members at the March 2022 Development Plan Meetings against the recommendation of the Chief Executive.</p> <p>The comments set out by the Office in regard to Amendment 2.20 and the rezoning of land located north and east of the Greenogue Business Park from RU to EE are noted. In particular, it is noted that the Office have stated that there is no evidence base or strategic justification to support the rezoning of these lands for a significant quantum of additional EE uses, noting the Greenogue Business Park is not identified as a strategic employment area in the RSES and the zoning is not consistent with RPO 5.6 which states:</p> <p><i>‘The development of future employment lands in the Dublin Metropolitan Area shall follow a sequential approach, with a focus on the re-intensification of employment lands within the M50 and at selected strategic development areas and provision of appropriate</i></p>

	<p>The Office further notes that Greenogue Business Park is not identified as a strategic employment area in the RSES for the region and the proposed rezoning is not consistent with RPO 5.6 (MASP Employment Lands) where it is an objective that <i>'the development of future employment lands in the Dublin Metropolitan Area shall follow a sequential approach, with a focus on the re-intensification of employment lands within the M50 and at selected strategic development areas and provision of appropriate employment densities in tandem with the provision of high quality public transport corridors.'</i></p> <p>In addition, the Office notes that the subject lands are also located in close proximity to the N7 national road. In this regard the provisions of section 2.7 of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012) states <i>'planning authorities must exercise particular care in their assessment of development/local area plan proposals relating to the development objectives and/or zoning of locations at or close to interchanges where such development could generate significant additional traffic with potential to impact on the national road.'</i></p> <p>It is not clear to the Office that the proposed rezoning satisfies the criteria in section 2.7 of the forementioned guidelines regarding development of national or strategic importance.</p> <p>Furthermore, in regard to Material Amendment 9.4 the Office notes that the Justification Test prepared as part of the updated SFRA acknowledges flood risk in the general area of Greenogue / Baldonnel and recommends retaining the current Rural RU zoning.</p> <p>Having regard to National Strategic Outcome 1 (Compact Growth) and National Policy Objective 11 of the National Planning Framework (NPF), Regional Policy Objectives 5.3 and 5.6 of the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly, section 2.7 of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012), and section 6.2.5 of the</p>	<p><i>employment densities in tandem with the provision of high-quality public transport corridors.'</i></p> <p>The need for a sequential approach to employment lands is noted and South Dublin is following this approach with the regeneration of the City Edge lands around the Naas Road. As indicated by the OPR, the proposed site is not at a selected strategic development location, nor is it serviced by a high-quality public transport corridor.</p> <p>The concerns raised in regard to accessibility and the impact on the N7 National Road, having regard to section 2.7 of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012) are noted. The OPR and TII (submission 43), have advised that the subject lands are located in proximity to Junction 4 of the N7, where the council should be mindful that any development proposals shall be subject to the requirements under Section 2.7 of the DoECLG Spatial Planning and National Roads Guidance which state: <i>'Planning authorities must exercise particular care in their assessment of development/local area plan proposals relating to the development objectives and/or zoning of locations at or close to interchanges where such development could generate significant additional traffic with potential to impact on the national road. They must make sure that such development which is consistent with planning policies can be catered for by the design assumptions underpinning such junctions and interchanges, thereby avoiding potentially compromising the capacity and efficiency of the national road/associated junctions and possibly leading to the premature and unacceptable reduction in the level of service available to road users.'</i></p> <p>The proposed rezoning, of approximately 53 hectares (130 acres), is a significant addition to the existing zoning in this</p>
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	<p>Development Plans , Guidelines for Planning Authorities - Draft for Consultation August (2021), the planning authority is required to:</p> <p>(i) omit the Enterprise and Employment zoning (Material Amendment 2.20) from the lands at Greenogue Business Park and retain the Rural RU zoning objective.</p> <p>The Office considers that the rezoning is contrary to compact growth and sequential development and would support unsustainable car dependant development at a greenfield location remote from high-capacity public transport and in close proximity to a junction on the national road network. Further, there is no evidence-based rationale underpinning the zoning of land for employment purposes at this location which also demonstrates that the criteria in section 2.7 of the Spatial Planning and National Roads Guidelines (2012) have not been satisfied; and</p> <p>(ii) omit the specific local objective (Material Amendment 9.4) which requires site specific flood alleviation measures to support its development. The Office notes that lands are affected by flood zones A / B and further rezoning in this general area is not supported in the Justification Test in the Strategic Flood Risk Assessment which recommends retaining the Rural RU zoning (page 27).</p>	<p>area adjacent to and reliant on Junction 4 of the N7. The scale of potential new development has not been assessed against the local or national road network but is likely to give rise to significant additional traffic movements both from workers getting to and from the site and from transport related enterprise, to and from this junction which is already subject to capacity constraints. Having regard to the submissions from TII and the OPR on junction capacity and the lack of public transport, the rezoning is not considered to be in the interests of proper planning and sustainable development. This is particularly in light of policy within the RSES which indicates that development within the metropolitan area should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised.</p> <p>In addition to the above points the Office notes that the Justification Test prepared as part of the updated SFRA for the Plan acknowledges flood risk in the general area of Greenogue / Baldonnel and it is recommended that the Draft Plan zoning of ‘RU’ Rural should be retained. In this regard the submission from the OPW should also be noted which highlights that the subject lands fall within Flood Zone A and B which range from a high to moderate probability of flooding. While use classes such as Industry and Warehousing form a less vulnerable form of development the guidelines require that the zoning of any such lands for these uses meet the justification test. In this regard the lands do not satisfy all of the relevant criteria.</p> <p>This was previously outlined in the CE Report on the Draft Plan submitted to the Elected Members on 7th December 2021 and was further discussed at the meetings which considering the Draft Plan in late February.</p>
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		<p>It is noted that there are a number of submissions related to Amendment 2.20 and 9.4 which are subject to the same recommendation as below and which are dealt with further on in this report.</p> <p>Having regard to the above, National Strategic Outcome 1 (Compact Growth) and National Policy Objective 11 of the National Planning Framework (NPF), Regional Policy Objectives 5.3 and 5.6 of the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly, section 2.7 of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012), and section 6.2.5 of the Development Plans , Guidelines for Planning Authorities - Draft for Consultation August (2021), it is considered that proposed amendment 2.20 and the SLO under Material Amendment 9.4 are inappropriate and should be omitted.</p> <p>CE Recommendation: Omit Proposed Material Amendments 2.20 and 9.4 and make the Plan without the proposed amendments.</p>
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Recommendation 2 - Material Amendments 13.1, 13.2 and 13.3		
Submission No.	Submission Summary	CE Response and Recommendation
SD-C226-65	<p>The Office note the content of proposed Material Amendments 13.1, 13.2 and 13.3 which make Data Centres as a use not permitted in the zoning objectives for REGEN, Major Retail Centre and Enterprise and Employment.</p>	<p>CE Response: Amendments 13.1, 13.2 and 13.3 arose on foot of Motion 90 (Item ID: 73881) which put forward a proposal to ban data centres in the County by moving Data Centres use to the not permitted category under all zoning use classes. This proposed amendment was agreed by the Elected Members at the March 2022 Development Plan</p>

	<p>It is considered that the proposal conflicts with the provisions of RPO 8.25 in regard to Communications Networks and Digital Infrastructure which states that Local Authorities shall:</p> <ul style="list-style-type: none"> – <i>Support the delivery of the National Broadband Plan</i> – <i>Facilitate enhanced international fibre enhanced international fibre communications links, including full interconnection between the fibre networks in Northern Ireland and the Republic of Ireland.</i> – <i>Promote and facilitate the sustainable development of a high-quality ICT network throughout the Region in order to achieve balanced social and economic development, whilst protecting the amenities of urban and rural areas.</i> – <i>Support the national objective to promote Ireland as a sustainable international destination for ICT infrastructures such as data centres and associated economic activities at appropriate locations</i> – <i>Promote Dublin as a demonstrator of 5G information and communication technology.’ (Emphasis added)</i> <p>Having regard to Regional Policy Objective 8.25 of the Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly which states that ‘Local authorities shall... Support the national objective to promote Ireland as a sustainable international destination for ICT infrastructures such as data centres and associated economic activities at appropriate locations...’, and the absence of any strategic justification to support making data centres a ‘not permitted’ use across all zoning objectives in the Draft Plan, the planning authority is required to make the Plan without Material Amendments 13.1, 13.2 and 13.3 and retain data centres as an ‘open for consideration’ use in the REGEN, Enterprise & Employment (EE) and Major Retail Centre (MRC) zoning objectives.</p>	<p>Meetings against the recommendation of the Chief Executive.</p> <p>The submission of the Office is noted in regard to proposed material amendments 13.1, 13.2 and 13.3 which moves Data Centres as a use ‘open for consideration’ in the Draft Plan to ‘not permitted’ in the zoning objectives for REGEN, Major Retail Centre and Enterprise and Employment.</p> <p>The points raised in relating to the provisions of RPO 8.25 in regard to Communications Networks and Digital Infrastructure which states that ‘Local authorities shall... Support the national objective to promote Ireland as a sustainable international destination for ICT infrastructures such as data centres and associated economic activities at appropriate locations...’, and the absence of any strategic justification to support making data centres a ‘not permitted’ use across all zoning objectives in the draft Plan are noted.</p> <p>Having regard to the above, and to the response to the submissions set out under Amendments 13.1-13.3 further below in this report, it is considered that proposed amendments 13.1, 13.2 and 13.3 are not consistent with RPO 8.25 and in accordance with the Recommendation of the OPR such provisions should be omitted from the plan.</p> <p>CE Recommendation: Omit Amendments 13.1, 13.2 and 13.3 and make the Plan without the proposed amendments.</p>
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Recommendation 3 - Material Amendment 6.8		
Submission No.	Submission Summary	CE Response and Recommendation
SD-C226-65	<p>The Office refer to the content of Draft Plan in regard to Rural Housing in particular the provisions set out in the Draft Plan in regard to 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>In regard to proposed material amendment 6.8 it is considered that the provisions set out provide for a relaxation of the above Objective through the proposed amendment to include H17 Objective 2:</p> <p><i>'To consider persons for a rural house in the RU zone on the basis of their being an intrinsic part of the rural community where such persons have grown up or spent substantial periods of their lives, (12 years), living in the area or have moved away and who now wish to return to reside near to, or to care for, immediate family members and are seeking to build on the family landholding. Immediate family members are defined as mother, father, son, daughter, brother or sister'.</i></p> <p>The Office consider that the inclusion of this objective which is not based on social or economic need to live in the area, is inconsistent with NPO19 and is premature pending a comprehensive review of the Rural Housing Policy and local need criteria in the development plan.</p> <p>Having regard to the above the Office recommended that objective H17 Objective 2 be removed as it is considered to be inconsistent with NPO 19 and premature pending a comprehensive review of the rural housing policy and local need criteria consistent with NPO 20.</p>	<p>CE Response: Amendment 6.8 arose on foot of Motion 49 (Item ID: 73856) which put forward a proposal to insert this new objective 'H17 Objective 2'. This proposed amendment was agreed by the Elected Members at the March 2022 Development Plan Meetings against the recommendation of the Chief Executive.</p> <p>A previous motion requesting such provisions was also put forward at pre-Draft Plan stage under Motion ID: 70917 and it was recommended that a new objective would be inserted in Chapter 6 titled H17 Objective 1, to read as follows:</p> <p><i>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.</i></p> <p>A similar issue was also submitted to the Draft Plan through the public consultation period under submission SD-C195-217 and the Chief Executive responded under Chapter 6: Housing – Rural Housing Strategy, pg582-584 stating that under H17 Objective 1 the Council is 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 public consultation of this process. The review process requires a review of Rural Housing Policy which includes Policy H19: 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: To enhance public services for rural communities, the Government will:</p>

		<p><i>Policy Measure 89 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 Update the Rural Housing Guidelines for planning authorities, to address rural housing in a broader rural development and settlement context.</i></p> <p>The OPR indicates that the amendment would be inconsistent with NPO 19 which states (as relevant to South Dublin which is an area under urban influence): ‘Ensure, in providing for the development of rural housing, that a distinction is made between areas under urban influence, i.e. within the commuter catchment of cities and large towns and centres of employment, and elsewhere: In rural areas under urban influence, facilitate the provision of single housing in the countryside based on the core consideration of demonstrable economic or social need to live in a rural area and siting and design criteria for rural housing in statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements..’</p> <p>and to include such an objective would be premature pending a comprehensive review of the rural housing policy and local need criteria consistent with NPO 20, which states:</p> <p>‘Project the need for single housing in the countryside through the local authority’s overall Housing Need Demand Assessment (HNDA) tool and county development plan core strategy processes’</p> <p>H1 Objective 12 of the Draft Plan states:</p>
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		<p>'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'</p> <p>Having taken the points raised by the Office alongside the previous views set out at various stages of the plan making process, it is considered that the inclusion of the Amendment in the Plan would be premature pending the review of the rural housing policy already included as an objective in the Draft Plan. It would also be preferable if the forthcoming updated Rural Housing Guidelines, to be published by the Government, were in place to ensure that the Council's review will be fully aligned with national policy.</p> <p>Having regard to the above and to the recommendation of the OPR it is recommended that Amendment 6.8 in relation to H17 Objective 2 be omitted.</p> <p>CE Recommendation: Omit Amendment 6.8 and make the Plan without the proposed amendment.</p>
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Observation 3 - Material Amendment 7.21		
Submission No.	Submission Summary	CE Response and Recommendation
SD-C226-65	<p>The Office makes reference to Observation 10 to the Draft Plan which related to the description and function of the Western Orbital Route. While the changes to the description and function proposed in Material Amendment 7.21 are generally acceptable, it is considered that the text regarding the function of the proposed Western Orbital Route should include a minor modification to state that the proposed</p>	<p>CE Response: Amendment 7.21 arose on foot of Motion 62 (Item ID 73973) which put forward a proposal to amend the wording in Table 7.5 Six Year Road Programme for the Western Orbital Route. It was recommended by the CE that the motion be adopted with amendment in recognition of the submission by the NTA in regard to the function of this</p>

	<p>road would include provision for sustainable transport modes along its length.</p> <p>This would provide for consistency with section 10(2)(n) of the Act and policies and objectives in the draft Plan promoting more sustainable travel and a significant reduction in the mode share for the private car such as Policy SM1, Policy SM3, SM1 Objective 1 and SM3 Objective 6.</p> <p>Having regarding to the proposed material alterations to Table 7.5 in the draft Plan regarding the description and function of the proposed Western Orbital Route, section 10(2)(n) of the Planning and Development Act 2000, (as amended) and 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, the planning authority is requested to make a minor modification to the function of the proposed Western Orbital Route to state that it would include provision for sustainable transport modes along its length.</p>	<p>route. This proposed amendment was agreed by the Elected Members at the March 2022 Development Plan Meetings.</p> <p>The Office set out that while they consider the changes to the description and function proposed in Material Amendment 7.21 are generally acceptable the text regarding the function of the proposed Western Orbital Route should include a minor modification to state that the proposed road would include provision for sustainable transport modes along its length.</p> <p>While Measure ROAD9 of the NTA Draft Transport Strategy for the Greater Dublin Area (GDA) is clear in the need for provision for the incorporation of sustainable transport modes as part of this route it can also be inserted into the function of this route as set out in Table 7.5 of the Development Plan for completeness.</p> <p>In addition to the rewording proposed in the OPRs observation, submission SD-226-6 from the NTA has requested that the details relating to this route be further amended through the removal of reference to an extension of this route to the N81 as this is not detailed in the NTA Draft Transport Strategy for the GDA. While the reasoning set out by the NTA is noted, this proposed modification cannot be carried out at this stage of the plan making process as both the Draft and Material Amendment wording have been on public display with clear references to the western orbital route and the extension to the N81.</p> <p>To address this issue, it is considered that the requirement of the NTA can be largely met by inserting the wording 'a potential' in the 'Description' of the Western Dublin Orbital Route which would match the wording of the 'Function' of this route currently set out under Material Amendment 7.21. Further minor amendments are also recommended to the</p>
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		<p>objective to ensure it reads logically and to reflect that the NTA Strategy will be in place when the Plan comes into effect and will no longer be under review as worded in the Draft Plan.</p> <p>CE Recommendation: Minor modification to Material Amendment 7.21 as follows: From:</p> <p><i>Description:</i> New Road from the N7 to the N4 Leixlip Interchange with an extension to the N81. <i>Function:</i> 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 primarily to provide resilience to the M50, recognising that this may also provide additional resilience to peripheral roads within the county, in particular between the N7 and N4. 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 alluvial woodlands at Rathcoole, 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: Description: New Road from the N7 to the N4 Leixlip Interchange with a potential extension to the N81.</p> <p>Function: New Road to link between the N7 and the N4 Leixlip Interchange to include provision for sustainable transport modes along its length, the function of this</p>
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		<p>route would be primarily to provide resilience to the M50. There is further potential for a further the extension of this route from the N7 to the N81 with a route by-pass function around Rathcoole and Saggart, recognising that this may also provide additional resilience to peripheral roads within the county in particular between the N7 and N4. 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. Development of these routes will be aligned with the NTAs GDA Transport Strategy. Delivery will be 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 alluvial woodlands at Rathcoole, 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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Climate Action		
Submission No.	Submission Summary	CE Response and Recommendation
SD-C226-65	<p>The Office make reference to their previous observation 11 to the Draft Plan which requested that an objective be included in regard to a variation to 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.'</p> <p>While the inclusion of an objective to address Observation 11 would have been welcome, the Office accepts the response provided by the planning authority in the section 12(5)(aa) letter which states that the Development Plan will</p>	<p>CE Response: The Office's acceptance of this view is noted and welcomed.</p> <p>CE Recommendation: No Change to Plan.</p>

	be reviewed, and a variation initiated should significant changes to climate change policy or legislation arise.	
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Conclusion		
Submission No.	Submission Summary	CE Response and Recommendation
SD-C226-65	<p>The submission concludes with a summary of the above issues and request that the above recommendations are complied with and the observations considered.</p> <p>The submission further sets out the requirements at the end of the process which require the Planning Authority to notify the OPR within 5 working days of the decision of the Planning Authority in relation to the Material Alterations to the Draft Plan. Where a decision is made not to comply with the recommendations of the Office, or otherwise makes the plan in such a manner as to be inconsistent with the recommendations of the Office, the Chief Executive must inform the Office accordingly and state the reasons for the decision of the Planning Authority.</p>	<p>The submission summary and requirements in regard to notifying the OPR within 5 working days of the decision of the Planning Authority in relation to the Material Alterations to the Draft Plan is noted.</p> <p>It is further noted that where a decision is made not to comply with the recommendations of the Office, or otherwise makes the plan in such a manner as to be inconsistent with the recommendations of the Office, the Chief Executive will inform the Office accordingly and state the reasons for the decision of the Planning Authority.</p>

Chapter 2 – Core Strategy and Settlement Strategy

The following submissions are related to Proposed Material Amendments to Chapter 2 - Core Strategy and Settlement Strategy. In general, the format for the amendments in this chapter and the other chapters in this CE Report is to summarise the relevant submissions made on an amendment and make a single response and recommendation.

However, Proposed Amendment 2.1 has been dealt with differently due to its complexity. The figures for the Core Strategy in the Draft Plan were calculated initially based on a 7.75 year timeframe reflecting the years 2020 to 2028 when the Plan was first prepared. The Planning Authority was required to revise the figures and Core Strategy Table 7 to provide Housing Supply Target (HST) figures calculated in accordance with the 6-year plan period on foot of a recommendation made by the Office of the Planning Regulator (OPR) on the Draft Plan.

As a result, Proposed Amendment 2.1 has many consequential amendments throughout Chapter 2 of the Plan and Appendix 2. The issues raised in submissions could not all be dealt with in a single response and have been addressed to best align to a specific section of Chapter 2 and the related Amendment 2.1.

It is important to note that any proposed change to Amendment 2.1 in any one section has a corresponding impact to the Core Strategy and settlement strategy throughout chapter 2 insofar as it relates to Amendment 2.1, including impacts on other amendments. In this regard, the figures set out in Amendment 2.1 and the tables below relate to population and unit growth which, on an evidence base, align with required land areas/zoning needed to achieve the delivery of the targeted growth. As such, even a perceived minor amendment may have significant implications for the core strategy.

In this regard, it is highlighted that Section 12 (10) (c) of the Planning and Development Act 2000 (as amended). Section 12 (10) (c) states:

“A further modification to the alteration – (i) may be made where it is minor in nature and therefore not likely to have significant effects on the environment or adversely affect the integrity of a European site, (ii) shall not be made where it relates to – (I) an increase in the area of land zoned for any purpose, or (II) an addition to or deletion from the record of Protected Structures”.

Chapter/ Section	Section 2.2 Executive Summary	
Amendment ref.	Amendment 2.1	
Page no.	28	
Policy/Objective No.	Text Change - 2.2 Executive Summary	
Consequential Amendment	Note: Section 2.6.4 Deliverability Analysis is a Consequential Amendment arising from Material Amendment 2.1 and contained with the accompanying PDF on the Consultation Portal and Website. View Consequential Amendments [PDF]	
Text/Policy/Objective Amendment Wording		
Amend text from: Taking account of completed units between 2017 and 2021 (5,914 Units) there is an overall requirement of 17,817 units between 2021 and 2028. The Core Strategy (Table 10) demonstrates how this target can be met up to 2028 taking into consideration units under construction. It has been developed by applying a four-step approach to the identification and assessment of lands capable of meeting this housing requirement.		
To Read: Taking account of completed units between 2017 and Q3 2021 (5,914 Units) (6,554 Units) plus an estimated delivery of 1600 units between Q3 2021 and Q3 2022 (total of 8,154 Units) there is an overall requirement of 17,817 15,576 units between 2021 2022 and 2028. The Core Strategy (Table 10) demonstrates how this target can be met up to 2028 taking into consideration units under construction. It has been developed by applying a four-step approach to the identification and assessment of lands capable of meeting this housing requirement.		
Submission No.	Submission Summary	CE response and recommendation
SD-C226-38 Deputy Emer Higgins	The submission refers to the Office of the Planning Regulator which advised in September that “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	CE Response: The content of the submission is noted. While this submission has questioned the planned growth in Newcastle, Rathcoole and Saggart no modification to the amendment has been put forward.

	<p>strengthen the policy and objectives to reflect the need to support incremental growth to align with infrastructure and service”.</p> <p>The submission states that this has not been achieved and that planned infrastructure is being reduced before it is being built, with the Western Orbital Route proposed to only go to the N7 and not the N81 in the Plan.</p> <p>Following the submission by the Office of the Planning Regulator, regarding the growth trajectory for the villages of Newcastle and Rathcoole, the submission questions the planned development in Rathcoole, Saggart and Newcastle, stating it has increased by 25% without any planned increase in infrastructure.</p> <p>The submission also states that the population of Rathcoole has grown by 194% over a ten-year period (2006-2016) and this level of growth exceeds the South Dublin average for the same period (12.89%) and EMRA (15%). The submission states that a further increase of 30%+ in Newcastle and Rathcoole without the delivery infrastructure would represent bad planning.</p>	<p>In line with the provisions of National Planning Policy (NPO) 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 to the settlements of Newcastle, Rathcoole and Saggart under Proposed Amendment 2.11, 2.12 and 2.13. In this regard, the OPR in its recent submission (SD-C226-65) to the Proposed Amendments specifically states <i>“the office welcomes many of the changes proposed as material amendments to the draft Plan in particular,.....the approach to moderate and phase the future growth of Rathcoole and Newcastle...”</i> and <i>“The Office welcomes the clarity provided in the revised core strategy tables and reduced allocations provided to the Self-Sustaining Growth Towns of Rathcoole and Newcastle”</i>.</p> <p>The above combined with the zoning changes and objectives introduced in response to Recommendation 3 and Observations 1 and 3 of the Office’s submission to the draft Plan provide for more sustainable and moderate growth of Rathcoole and Newcastle over the plan-period”. In relation to Saggart, the OPR states <i>“ While the planning authority has not reduced the core strategy housing allocation or quantum of land zoned for residential development in Saggart in response to Recommendation 4 of the Office’s submission to the draft Plan, the Office accepts the rationale provided in the Chief Executive’s (CE’s) report (page 36) and welcomes the introduction of specific</i></p>
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		<p><i>local objective CS8 SLO1 and the intent to prepare a local area plan for the settlement (QDP14 Objective 5).” As such, the provisions proposed under Proposed Amendments 2.11,2.12 and 2.13 ensure that these settlements develop through a phased approach and at an incremental pace, based on the delivery of social, physical and transport infrastructure and services.</i></p> <p>While the comments on the Western Orbital Route are noted they cannot be dealt with as part of Amendment 2.1. Amendment 7.21 relates to the Western Orbital Route and the CE Response and Recommendation to the submissions are set out under that amendment.</p> <p>CE Recommendation:</p> <p>No change to Amendment 2.1</p>
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Chapter/ Section	New Table 11 - Section 2.6.5 Core Strategy – 2022 – 2028 Development Plan
Amendment ref.	Amendment 2.1
Page no.	54
Policy/Objective No.	Update Table 10: Core Strategy Table 2022 – 2028 - 2.6.5 Core Strategy – 2022 – 2028 Development Plan
Consequential Amendment	Consequential Amendment arising from Material Amendment 2.1 View Consequential Amendments [PDF]
Text/Policy/Objective Amendment Wording	

<p>Amend Table 10 from: Table 10: Core Strategy Table 2022 – 2028 To Read: Table 10 11: Core Strategy Table 2022 – 2028</p> <p>Revised Table 11 Core Strategy Table 2022 – 2028 as indicated.</p>		
<p>SD-C226-63 Department of Education & Skills</p>	<p>The submission indicates that the material alterations do not result in a projected change to the school place requirements.</p> <p>The submission also notes Amendment 2.1 and the redistributed settlement targets and indicates that the redistribution of projected growth is not considered significant enough to result in a change in the projected school place requirements.</p>	<p>CE Response:</p> <p>The content of the submission from the Department of Education is noted in regard to the redistributed settlement targets for the County and that the extent of change does not require changes to the projected school place requirements set out in the Draft Plan.</p> <p>CE Recommendation:</p> <p>No change to Amendment 2.1.</p>
<p>Chapter/ Section</p>	<p>New Table 11 - Section 2.6.5 Core Strategy – 2022 – 2028 Development Plan</p>	
<p>Amendment ref.</p>	<p>Amendment 2.1</p>	
<p>Page no.</p>	<p>54</p>	
<p>Policy/Objective No.</p>	<p>Update Table 10: Core Strategy Table 2022 – 2028 - 2.6.5 Core Strategy – 2022 – 2028 Development Plan</p>	
<p>Consequential Amendment</p>	<p>Consequential Amendment arising from Material Amendment 2.1 View Consequential Amendments [PDF]</p>	
<p>Text/Policy/Objective Amendment Wording</p>		
<p>Amend Table 10 from: Table 10: Core Strategy Table 2022 – 2028</p>		

To Read: Table 10 11: Core Strategy Table 2022 – 2028

Revised Table 11 Core Strategy Table 2022 – 2028 as indicated on the Consultation Portal and Website.

<p>SD-C226-79 Belgard Area Residents Association</p> <p>SD-C226-1 Proinsias Mac Fhlannchadha</p>	<p>Two submissions question the overall housing figures and figures in Table 11.</p> <p>One submission query's how the target of 15,576 can be met during the lifetime of the Plan (representing an average of 2,596 units per annum) when the best year for completed units per annum yielded 1644 from 2018-2020. (Table 11).</p> <p>While the other submission questions the deliverability of 15,576 new homes over the lifetime of the plan and suggests that there will be a shortfall of approximately 5,000 homes. This submission further questions the methodology and sources used in the calculation of new homes required and suggests that the CSO updated population information issued in 2021 should be reflected in the housing tables.</p>	<p>CE Response:</p> <p>The content of the submissions raises queries, but it is noted that one submission suggests that updated population figures should be reflected in the housing tables.</p> <p>In response to the queries set out the Draft Plan's Core Strategy and Settlement Strategy 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). In this regard, it should be noted that both EMRA and the Office of the Planning Regulator (OPR), in their submissions to the Draft Plan, noted that the Core Strategy was consistent with National and Regional Policy.</p> <p>In developing the Core Strategy, a comprehensive review of the extent of land zoned RES-N, recognition of the provisions of NPO9 of the NPF, infrastructural requirements within each area, and alignment with overall housing supply targets was conducted.</p> <p>The Department of Housing, Local Government and Heritage issued Section 28 Guidelines titled: "<i>Housing Supply Target Methodology for Development Planning</i>", December 2020 ('the</p>
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		<p>Supply Guidelines’) to assist in providing Planning Authorities with the figures and methodology to incorporate national and regional population and housing projections into their statutory functions. The Supply Guidelines were informed by research carried out by the Economic and Social Research Institute (ESRI). ESRI NPF scenario projected new household demand 2017 to 2031 of 25,459 households. Based on the Department’s methodology and the Supply Guidelines, the Draft Plan projected need from 2021 up to Quarter 3 2028 (7.75 years), providing a figure for housing demand of 17,817. However, in line with the recommendations of the Office of the Planning Regulator 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. This has reduced the housing demand figures for the plan period in Table 7 from 17,817 to 15,576 units.</p> <p>With regard to the delivery of housing, 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. This will facilitate the delivery of the housing supply targets through an adequate supply of suitable zoned lands for housing to complement the Council’s supply pipeline over the period.</p> <p>CE Recommendation:</p>
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		No change to Amendment 2.1 Note: No Amendments were proposed as part these submissions.
Chapter/ Section	Table 9 - Section 2.6.1 Land Capacity Study	
Amendment ref.	Amendment 2.1	
Page no.	49	
Policy/Objective No.	Update Table 9: Capacity of undeveloped lands within South Dublin - 2.6.1 Land Capacity Study	
Consequential Amendment	Consequential Amendment arising from Material Amendment 2.1 View Consequential Amendments [PDF]	
Text/Policy/Objective Amendment Wording		
Amend Table 9 from: Table 9: Capacity of undeveloped lands within South Dublin To read: Table 9: Capacity of Undeveloped Lands within South Dublin 2022-2028 Revised Table 9 Capacity of Undeveloped Lands within South Dublin as indicated on the Consultation Portal and Website.		
SD-C226-79 Belgard Area Residents Association	The submission questions where the figure 21,490 comes from and how it was arrived at (Table 9) and raises concerns that the projected housing delivery numbers, 23,730 dwelling units, on 428 hectares will require high density resulting in a type of housing (two-bedroom apartments) that are not suitable, both in size and standards, to meet accommodation need.	CE Response: The content of the submission is noted. No Amendments have been proposed as part of these submissions. All appropriately zoned lands have been assessed with the potential for residential development and a residential density for each site has been applied in line with Ministerial Guidelines. As such and informed by this work, there is a total Land Capacity of 990ha with the potential for 42,570 units. However, by

		<p>excluding Long Term Strategic Lands, the land capacity reduces to 428 ha with the potential to accommodate 21,490 units, as updated in the amendments to the core strategy to reflect the 6 year period of the Development Plan.</p> <p>With respect to concerns raised in relation to two-bedroom units, the Housing Strategy and Interim Housing Needs Demand Assessment (HNDA) contained within Appendix 11 of the Draft Plan carries out an evidence-based assessment for the County up to 2028. The Draft Plan acknowledges the need to provide more family type housing within new apartments when considering 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. 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. H1 Objective 13 is of particular note which aims to provide for a minimum of 30% 3 bedrooms units unless certain criteria can be met. Refer to amendment 6.3 for further details in this regard.</p> <p>CE Recommendation:</p> <p>No change to Amendment 2.1</p> <p>Note: No Amendments were proposed as part these submissions.</p>
Chapter/ Section		Section 2.2 Executive Summary

Amendment ref.	Amendment 2.1
Page no.	29
Policy/Objective No.	Text Change - 2.2 Executive Summary
Consequential Amendment	Consequential Amendment arising from Material Amendment 2.1 View Consequential Amendments [PDF]

Text/Policy/Objective Amendment Wording

Amend text from:

- The housing target for South Dublin County, as set by Ministerial Guidelines and the NPF Road Map, is 17,817 homes up to 2028.
- Of this there are currently 4,557 homes under construction, thereby reducing the need to 13,260 homes up to 2028.
- 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.
- Informed by this work, 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.
- An Infrastructure Assessment was carried out for these lands to identify the capacity of lands in Tier 1 (i.e. zoned and serviced) which has a total of 11,597 homes and in Tier 2 (i.e. zoned and serviceable within the lifetime of the plan) which has a total of 12,133.
- A further Planning and Deliverability assessment was carried out across the Tier 1 and 2 lands and has been found to have sufficient capacity to meet total housing target set for the County.
- Based on above – the core strategy identifies that there is no requirement to zone additional lands to meet population or housing targets.

To Read:

- The housing target for South Dublin County, as set by Ministerial Guidelines and the NPF Road Map, is ~~17,817~~ **15,576** homes up to 2028.
- ~~Of this there are currently 4,557 homes under construction, thereby reducing the need to 13,260 homes up to 2028.~~
- 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.
- Informed by this work, there is a total Land Capacity of ~~1,039ha~~ **990ha** with the potential for ~~44,472~~ **42,570** units. However, by excluding Long Term Strategic Lands, the land capacity reduces to ~~477~~ **428** ha with the potential to accommodate ~~23,731~~ **21,490** units.

- An Infrastructure Assessment was carried **out in preparation of the Plan** for these lands **in 2021 which identified ~~to identify~~** the capacity of lands in Tier 1 (i.e. zoned and serviced) which had a total of 11,597 homes and in Tier 2 (i.e. zoned and serviceable within the lifetime of the plan) which had a total of 12,133. **Based on known construction activity and estimated delivery up to Q3 2022 the total capacity of Tier 1 and Tier 2 lands is 21,490 units over the Plan period.**
- A further Planning and Deliverability assessment was carried out across the Tier 1 and 2 lands and confirmed sufficient capacity to meet the total housing target set for the County.
- Based on above – the core strategy identifies that there is no requirement to zone additional lands to meet population or housing targets.

SD-C226-53 John Spain Associates

The submission wishes to comment on the proposed material amendments and refers to subject lands at Aderrig and Tobermaclugg, Lucan, Co. Dublin specifically concerning Proposed Amendment 2.1 of Chapter 2.

The submission comments that the quantum of residential zoned lands within the County is not sufficient to meet the needs of the future population up to 2028. It states the expected delivery of residential units are unrealistic and the approach to residential zonings should be revisited to prevent a shortfall in residential zoned development land in the County.

The submission states the Core Strategy should be revisited within one year of the adoption of the South Dublin County Development Plan 2022 – 2028 and increase the quantum of suitably located residential zoned land in the County in line with any increase in population growth and targets.

CE Response:

The content of the submission is noted.

The Draft Plan’s Core Strategy and Settlement Strategy 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). In this regard, it should be noted that both EMRA and the Office of the Planning Regulator (OPR), in their submissions to the Draft Plan, noted that the Core Strategy was consistent with National and Regional Policy.

The OPR in its recent submission (SD-C226-65) to the Proposed Amendments specifically states the “...the *draft Plan to be generally consistent with policies in the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly area, and recommended changes to enhance its alignment with national and regional policies in the aforementioned, and for*

	<p>The submission proposes the following additional text (black bolded) at the end of Proposed Amendment 2.1 as detailed under Section 2.2 'Executive Summary' to read as follows:</p> <ul style="list-style-type: none"> • The housing target for South Dublin County, as set by Ministerial Guidelines and the NPF Road Map, is 17,817 15,576 homes up to 2028. • Of this there are currently 4,557 homes under construction, thereby reducing the need to 13,260 homes up to 2028. • 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. • Informed by this work, there is a total Land Capacity of 1,039ha 990ha with the potential for 44,472 42,570 units. However, by excluding Long Term Strategic Lands, the land capacity reduces to 477 428 ha with the potential to accommodate 23,731 21,490 units. • An Infrastructure Assessment was carried out in preparation of the Plan for these lands in 2021 which identified to identify the capacity of lands in Tier 1 (i.e. zoned and serviced) which had a total of 11,597 homes and in Tier 2 (i.e. zoned and serviceable within the lifetime of the plan) which had a total of 12,133. Based on known construction activity and estimated delivery up to Q3 2022 the total capacity of Tier 1 and Tier 2 lands is 21,490 units over the Plan period. 	<p><i>consistency with, amongst others the Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities (2020), The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009), and Development Plans Guidelines for Planning Authorities - Draft for Consultation (2021)".</i></p> <p>In developing the Core Strategy, a comprehensive review of the extent of land zoned RES-N, recognition of the provisions of NPO9 of the NPF, an assessment of the infrastructural requirements within each area and alignment with overall housing supply targets was conducted.</p> <p>The core strategy was developed through a rigorous evidence-based process based on the most up to date data available at the time of writing and of housing targets set through the National Planning Framework. South Dublin has a total land capacity of 990 hectares with the potential for 42,570 units. As set out in Chapter 2 of the Draft Plan, this is in excess of the lands required to meet the housing target for the period 2022-2028. The excess land is generally identified as Strategic Long Term Development Areas and provides capacity to deliver housing beyond the development plan period. These lands are suitably located and zoned in line with the Regional Strategy and the National Planning Framework. There is no justification for the zoning of any further land nor is there need for a review within one year of the Plan's adoption. The statutory two year review of the</p>
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	<ul style="list-style-type: none"> • A further Planning and Deliverability assessment was carried out across the Tier 1 and 2 lands and confirmed sufficient capacity to meet the total housing target set for the County. • Based on above – the core strategy identifies that there is no requirement to zone additional lands to meet population or housing targets. • A one-year review of the Core Strategy section of the Development Plan will be undertaken by the Planning Authority and should there be evidence of the need for further residential zoning within the lifetime of the Plan, a Variation to the Plan will be immediately initiated informed by: <ul style="list-style-type: none"> • Analysis of Census 2022 population data and updated regional population projections, • Analysis of the type of housing need, • Analysis of the appropriate locations to serve such need, and Relevant National and Regional policy. 	<p>Development Plan will incorporate an update on the monitoring of housing delivery and the objectives of the Development Plan.</p> <p>As such, it is considered that it considered the additional wording proposed to Amendment 2.1 under Section 2.2 'Executive Summary' is not justified or necessary.</p> <p>CE Recommendation:</p> <p>No change to Amendment 2.1</p> <p>Note: It is considered that the proposed further amendment is not minor in nature and is outside the scope of this stage of the plan making process.</p>
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Chapter/ Section	Table 9 - Section 2.6.1 Land Capacity Study And New Table 11 - Section 2.6.5 Core Strategy – 2022 – 2028 Development Plan
Amendment ref.	Amendment 2.1
Page no.	49 and 54
Policy/Objective No.	Update Table 9: Capacity of undeveloped lands within South Dublin - 2.6.1 Land Capacity Study

Consequential Amendment	And Update Table 10: Core Strategy Table 2022 – 2028 - 2.6.5 Core Strategy – 2022 – 2028 Development Plan	
	Consequential Amendment arising from Material Amendment 2.1 View Consequential Amendments [PDF]	
Text/Policy/Objective Amendment Wording		
<p>Amend Table 9 from: Table 9: Capacity of undeveloped lands within South Dublin To read: Table 9: Capacity of Undeveloped Lands within South Dublin 2022-2028</p> <p>And Amend Table 10 from: Table 10: Core Strategy Table 2022 – 2028 To Read: Table 10 11: Core Strategy Table 2022 – 2028</p> <p>Revised Table 9 Capacity of Undeveloped Lands within South Dublin and Table 11: Core Strategy Table 2022 – 2028 as indicated on the Consultation Portal and Website.</p>		
SD-C226-28 CAIRN Plc	<p>The submission indicates that lands in their ownership are located mainly to the south of the main street of Newcastle.</p> <p>The submission supports the identification of Newcastle in the Core Strategy as a “Self-Sustaining Growth Town” in the Settlement Hierarchy and the ability of Newcastle to absorb further growth over the period 2022-2028 in tandem with social and physical infrastructure. The submission refers to the Draft Development Plan Guidelines 2021 (DDPGs) highlights Section 4.4.3 of the DDPGs which discusses Additional Provision and that they include an allowance for</p>	<p>CE Response:</p> <p>The content and support of the submission is noted in regard to the identification of Newcastle in the Core Strategy as a “Self-Sustaining Growth Town”.</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. The approach taken considers the need to promote compact growth in a balanced way, in line with regional and</p>

	<p>'Additional Provision', of zoned lands of 20-25% of the required quantum of zoned land and sites in settlements in any planning authority area as a whole for any six-year plan period and should be undertaken on a settlement basis.</p> <p>In this respect, the submission requests that the adopted Plan does not constrain the delivery of housing and to ensure that the Plan considers in its core strategy the 'additional provision' outlined in the DDPGs 2021. The submission recognises the Tier 1 Status of the lands at Newcastle and the amended capacity of 646 units that could be facilitated over the Plan period. In this regard, the submission notes that the identification of 398 no. dwellings between 2022-2028 (a reduction of 240 no. dwellings) and puts forward that 498 no. dwellings would be appropriate to allow for flexibility in the delivery of dwellings over the Plan period when considering the "additional provision" allowable. It is therefore requested to update Table 9 and Table 11 with the revised figure of 498 units.</p> <p>The submission also refers to the existing built out elements of Graydon Development and the permitted (to be constructed in the SuperValu site) be amended from RES-N "New Residential" to RES "Existing Residential" as consequential amendments to Table 10.</p>	<p>national strategy, within each neighbourhood area according to its role and function within the settlement hierarchy.</p> <p>The submission puts forward a proposal to revise Table 9 and Table 11 with a proposed increased figure of 498 units using the flexibility for 'additional provisions' in the Draft Development Plan Guidelines 2021 (DDPGs), Section 4.4.3. Based on the revised 6 year timeframe and additional units built between the Draft Plan and Q3 2022 when the Development Plan will come into effect, proposed Amendment 2.1 provides for a revised unit allocation for Newcastle of 398 units over the life of the Plan. The submission requests to increase this by 100 units. The unit growth as set out in the core strategy has been allocated applying a sequential approach to development whereby lands closest to the centre of Newcastle with the ability to deliver key infrastructure or where permission has already been granted have been identified as suitable to meet this target. Development in Newcastle can only occur in a phased manner with specific policy and objectives as set out in Proposed Amendment 2.12 to reflect the need to support incremental growth to align with infrastructure and services.</p> <p>Notwithstanding this, 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 as provided for under CS 3 Objective 3 of the Draft Plan. This allows for the Council to consider the redistribution of housing population figures within the</p>
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		<p>neighbourhood areas where the applicant must demonstrate to the Planning Authority that the proposal is aligned with the overall growth target for the County. The Core Strategy figures for each neighbourhood area serve as a benchmark for monitoring to ensure compliance with National and Regional figures. In this context, and also in the context of the intent of the guidelines which outline where the application of additional provision is relevant, it is not considered appropriate to provide for 'Additional Provision'.</p> <p>With respect to the request to amend the zoning of built out elements of Graydon Development and permitted developments from RES-N to RES, it should be noted that the targets set out in Table 10 (now Table 11 core strategy) relate to undeveloped lands only and do not relate to the existing Graydon permission. A permitted or partially built out aspect of a development does not render such developments fully constructed nor complete and the zoning remains appropriate.</p> <p>Critically zoning changes cannot be carried out at this stage of the Plan making process.</p> <p>CE Recommendation:</p> <p>No change to Amendment 2.1.</p>
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Amendment ref.	Amendment 2.1	
Page no.	54	
Policy/Objective No.	Update Table 10: Core Strategy Table 2022 – 2028 - 2.6.5 Core Strategy – 2022 – 2028 Development Plan	
Consequential Amendment	Consequential Amendment arising from Material Amendment 2.1 View Consequential Amendments [PDF]	
Text/Policy/Objective Amendment Wording		
Amend Table 10 from: Table 10: Core Strategy Table 2022 – 2028 To Read: Table 10 11 : Core Strategy Table 2022 – 2028 Revised Table 11 Core Strategy Table 2022 – 2028 as indicated.		
SD-C226-21 Irish Water	The submission notes, in relation to Amendment 2.1, Table 11, Section 2.6.5 Core Strategy, that the population target for the Newcastle area has increased from 5,039 up to 5,122 and indicates that there are no strategic issues with this. It is also submitted that any local upgrades will be developed.	CE Response: The content of the submission from Irish Water is noted in regard to the proposed increase in population target for Newcastle and that there are no strategic infrastructure issues with respect to the extent of change. CE Recommendation: No change to Amendment 2.1.
Chapter/ Section	New Table 11 - Section 2.6.5 Core Strategy – 2022 – 2028 Development Plan	
Amendment ref.	Amendment 2.1	

Page no.	54	
Policy/Objective No.	Update Table 10: Core Strategy Table 2022 – 2028 - 2.6.5 Core Strategy – 2022 – 2028 Development Plan	
Consequential Amendment	Consequential Amendment arising from Material Amendment 2.1 View Consequential Amendments [PDF]	
Text/Policy/Objective Amendment Wording		
<p>Amend Table 10 from: Table 10: Core Strategy Table 2022 – 2028 To Read: Table 10 11: Core Strategy Table 2022 – 2028</p> <p>Revised Table 11 Core Strategy Table 2022 – 2028 as indicated.</p>		
<p>SD-C226-68 TCC SD-C226-64 Tallaght Community Council</p>	<p>The submissions raise concerns regarding the disparity between Tallaght Town Centre Local Area Plan 2020 (Tallaght LAP) and the Draft Plan population targets.</p> <p>It is indicated that the population targets need to align with the National Planning Framework (NPF) and Local Area Plans (LAP) and the County Development Plans (CDP). One submission highlights those concerns were already raised regarding the lack of alignment between the NPF and the Tallaght LAP and notes that no satisfactory response has been received. It is contended that the Proposed Amendments do not align with the Tallaght LAP and clarification of same is sought.</p> <p>It is noted that the Tallaght Town Centre Local Area Plan 2020 (Tallaght LAP), page 6, states an increase of 31,784</p>	<p>CE Response:</p> <p>The content of the submission is noted.</p> <p>The Draft Plan’s Core Strategy and Settlement Strategy 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). It should be noted that both EMRA and the Office of the Planning Regulator (OPR), in their submissions to the Draft Plan, noted that the Core Strategy was consistent with National and Regional Policy.</p> <p>The OPR in its recent submission (SD-C226-65) to the Proposed Amendments specifically states the “...<i>the draft Plan to be generally consistent with policies in the National Planning</i>”</p>

	<p>over a number of plan periods. The submissions raise concern that the projected increase between that proposed in Amendment 2.1 and the Tallaght LAP appear to be too substantial and do not appear to harmonise with the Draft Plan. The submissions request for clarification of the difference in population increase and what the projected population of Tallaght LAP will be in 2028 which is guiding Tallaght’s sustainable growth.</p> <p>The submissions note that Proposed Amendment 2.1 - Table 11 highlights an increase in population in Tallaght of 5,157 whereas the Tallaght LAP indicates 38,000 over a number of plans and the submissions question if this applies to all of the Tallaght Area, including Tallaght Town Centre, and clarification on the difference.</p> <p>The submissions are supported by an extract from the updated Table 11 of Proposed Amendment 2.1 and population figures from the Tallaght LAP.</p>	<p><i>Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly area, and recommended changes to enhance its alignment with national and regional policies in the aforementioned, and for consistency with, amongst others the Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities (2020), The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009), and Development Plans Guidelines for Planning Authorities - Draft for Consultation (2021)”. In developing the Core Strategy, a comprehensive review of the extent of land zoned RES-N, recognition of the provisions of NPO9 of the NPF, infrastructural requirements within each area, alignment with overall housing supply targets was conducted.</i></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. In Section 2.7.1 Dublin City and Suburbs of the Draft County Development 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</i></p>
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		<p><i>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 land designated as Strategic Development Areas (SDA) 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 are 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 Neighbourhood Area which includes lands within the Tallaght Town Centre Local Area Plan and SDA lands is appropriate and aligns with National and Regional Plans as confirmed by EMRA and the OPR.</p> <p>CE Recommendation:</p> <p>No change to Amendment 2.1</p>
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Chapter/ Section	Section 2.5.1 South Dublin County Population - Baseline
Amendment ref.	Amendment 2.2
Page no.	39
Policy/Objective No.	Insert New Text - 2.5.1 South Dublin County Population - Baseline

Text/Policy/Objective Amendment Wording

As per EMRA Requirements Insert new text after Table 4 to read:

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 the 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.

Submission No.	Submission Summary	CE response and recommendation
SD-C226-70 TCC	<p>The submission questions the compliance of the population figures with the Regional Spatial Economic Strategy (RSES) and indicates that the figures contrast to the figures in the Tallaght Town Centre Local Area plan (Tallaght LAP).</p> <p>Proposed Amendment 2.2 discusses how the Road Map of the National Planning Framework (NPF) provides scope to bring forward population figures of +25% up to 2026 however the submission highlights that the Tallaght LAP population figure goes from 6,126 in 2016 to 38,000 after a number of plan periods. It is pointed out that this is a</p>	<p>CE Response:</p> <p>The content of the submission is noted.</p> <p>The submission is seeking clarity on an issue but does not propose any amendments to Proposed Amendment 2.1.</p> <p>The Draft Plan's Core Strategy and Settlement Strategy 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). Proposed Amendment 2.2</p>

	<p>percentage increase of over six times that is 600%, compared with the 25% increase indicated Proposed Amendment 2.2 and is considered to be excessive. The submission requests clarity for this difference and notes that the Tallaght LAP and adopted Plan should be similar.</p>	<p>arose on foot of a request from submission SD-C195-45 from the Eastern and Midland Regional Assembly (EMRA) on the Draft Plan. EMRA considered that the application of RSES 'High' population growth scenario was appropriate in the context of achieving compact sustainable growth in the existing built-up urban areas, and to support the implementation of the Dublin Metropolitan Area Strategic Plan (MASP) and recommended that a statement of justification for same should be included in the core strategy.</p> <p>With reference to the 25%, the Roadmap as published with the NPF acknowledges the transition of implementing Development Plans and provides scope to bring forward population figures of +25% up to 2026. However, this simply allows the 2031 targets to be front loaded, it does not provide for the exceedance of the 2031 high figure. The Draft Plan applied this population adjustment across the entire County in light of strong construction activity, completed residential units since 2016 and the continued demand for housing. This is further explained in the Draft Plan. It should be noted that both EMRA and the Office of the Planning Regulator (OPR), in their submissions to the Draft Plan, noted that the Core Strategy was consistent with National and Regional Policy.</p> <p>The submission seeks clarity on the difference of figures between the Core Strategy and the Tallaght Town Centre Local Area Plan (TTCLAP), The 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</p>
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		<p>character areas, is envisaged over a longer period of up to 20 years. These areas of lands, designated as Strategic Development Areas (SDA), have been excluded from the land capacity in the Core Strategy 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 across the entire County, 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. As such, the figures illustrated in the TTCLAP and the Draft Plan will not fully align in the 6 year core strategy for the Development Plan.</p> <p>CE Recommendation:</p> <p>No change to Amendment 2.2</p>
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Chapter/ Section	Section 2.5.5 Housing Supply Targets
Amendment ref.	Amendment 2.3
Page no.	47
Policy/Objective No.	New CS1 Objective 4 - 2.5.5 Housing Supply Targets

Text/Policy/Objective Amendment Wording

New CS1 Objective 4 to be added to read:

CS 1 Objective 4: To engage with the Land Development Agency (LDA), as may be necessary having regard to their role in the delivery of development, excluding lands owned by South Dublin County Council, in the planning and co-ordination of strategic land banks to achieve compact growth, sustainable development, and urban regeneration.

Submission No.	Submission Summary	CE response and recommendation
<p>SD-C226-37 Land Development Agency</p>	<p>The submission welcomes reference to the Land Development Agency within the County Development Plan. However, the wording proposed in objective CS1 Objective 4 is not compliant with the legislation and provisions of the Land Development Agency Act 2021. The LDA’s function and mandate is broad and relates to relevant public land and the Agency’s key role is in the management and development of relevant public land (Section 14 of the LDA Act 2021). Therefore, reference to excluding SDCC lands should be removed from the objective [relevant text in bold]:</p> <p>CS1 Objective 4 :</p> <p>To engage with the Land Development Agency (LDA), as may be necessary having regard to their role in the delivery of development, excluding lands owned by South Dublin County Council, in the planning and co-ordination of strategic land banks to achieve compact growth, sustainable development, and urban regeneration.</p>	<p>CE Response:</p> <p>On foot of the LDAs submission to the Draft Plan the Chief Executive’s Report of 7th December 2021 recommended the inclusion of a new objective in the Draft Plan. Having further regard to motions put forward at the meeting in February 2022 it was recommended by the CE to amend the objective to read:</p> <p>From:</p> <p><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>To:</p> <p><i>‘To engage with the Land Development Agency (LDA), as may be necessary having regard to their role in the delivery of development, in the planning and co-ordination of strategic land banks to achieve compact growth, sustainable development and urban regeneration.’</i></p>

		<p>Following debate the elected members agreed a further amendment to the objective as a material amendment to include the words ‘excluding lands owned by South Dublin County’ as follows:</p> <p><i>‘To engage with the Land Development Agency (LDA), as may be necessary having regard to their role in the delivery of development, excluding lands owned by South Dublin County Council, in the planning and co-ordination of strategic land banks to achieve compact growth, sustainable development and urban regeneration.’</i></p> <p>The LDA has sought the removal of the additional wording which seeks to exclude engagement by the Council with the LDA on lands owned by the Council.</p> <p>The Land Development Agency (LDA) is a commercial, State-sponsored body that has been created to coordinate land within State control for more optimal uses where appropriate, with a focus on the provision of housing. Over the life of the plan, the LDA may take on a lead role for progressing the redevelopment of land in the ownership of other state bodies. In these instances, the Council may need to engage with the LDA in a proactive manner to help drive 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>
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		<p>It is noted that Section 14 of the Land Development Agency Act 2021 highlights the functions of the LDA stating, under subsection (1), “<i>The functions of the Agency shall, subject to this Act, include the following: (a) to manage and develop certain relevant public land and prepare that land for development and, where necessary or expedient for that purpose, to so manage, develop and prepare other land which is contiguous to— (i) relevant public land, or (ii) land owned by the Agency, to facilitate the provision of housing for the public good</i>” [Emphasis added]. Of particular note is subsection 1(h) which provides the LDA with the power “<i>to acquire relevant public land;</i>”. Part 8, Section 16 details the powers of compulsory purchase in which the LDA can utilise.</p> <p>Having regard to the statutory role of the LDA, and to the role of the Council in facilitating housing delivery, it is considered that the exclusion of engaging with the LDA on Council owned land is not an appropriate objective for the Development Plan as it is contrary to government policy as set out in legislation.</p> <p>As this stage of the plan making process only provides for modifications to the material amendments that are minor in nature, it is considered that the Plan should be made without the proposed amendment to insert the new objective CS1 Objective 4. This would mean reverting back to the Draft Plan which did not contain the objective in any form.</p>
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		CE Recommendation: Make the plan without the proposed amendment.
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Chapter/ Section	Section 2.6.1 Land Capacity Study
Amendment ref.	Amendment 2.4
Page no.	48
Policy/Objective No.	CS2 Objective 1 -- 2.6.1 Land Capacity Study
Consequential Amendment	Consequential Amendment arising from Material Amendment 2.4 View Consequential Amendments [PDF]
Text/Policy/Objective Amendment Wording	
<p>Amend text from:</p> <p>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, 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>To read:</p> <p>CS2 Objective 1:</p>	

To prepare a Local Area Plan or other appropriate mechanism for the zoned Regeneration (REGEN) lands **and other lands** at Naas Road/Ballymount ~~to~~ **include the Local Centre zoning (LC) at Walkinstown as defined by the City Edge Project boundary**. 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 ~~Naas Road~~ **City Edge Strategic** Framework until such time as a Statutory Plan is in place.

Note: All references to Naas Road/Ballymount Lands throughout Chapter 2 to be updated to City Edge/City Edge Strategic Framework.

Submission No.	Submission Summary	CE response and recommendation
SD-C226-21 Irish Water	The submission notes, in relation to Amendment 2.4, CS2 Objective 1, that going forward all references to Naas Road/Ballymount Lands throughout Chapter 2 to be updated to City Edge/City Edge Strategic Framework.	<p>CE Response:</p> <p>The content of the submission from Irish Water is noted in regard to the updating references to City Edge. It is noted that the references to the same will be made to Chapter 2 and throughout the Draft Plan and associated appendices.</p> <p>CE Recommendation:</p> <p>No change to Amendment 2.4.</p>
SD-C226-45 Beauparc	The submission refers to Amendment 2.4 in respect to CS2 Objective 1 and the City Edge Strategic Framework. The submission indicates that Beauparc has active interests and investment in a number of land holdings within the South Dublin Council area, including lands within Ballymount Industrial Estate, which are included within the City Edge Project and zoned 'Regeneration' as part of the Draft South Dublin County Development Plan 2022- 2028.	<p>The contents of this submission are noted.</p> <p>The submission seeks a further amendment to CS2 Objective 1 by the addition of a sentence at the end as follows:</p> <p>CS2 Objective 1:</p> <p>To prepare a Local Area Plan or other appropriate mechanism for the zoned Regeneration (REGEN) lands and other lands at Naas Road/Ballymount to include the Local Centre zoning (LC) at Walkinstown as defined by the City Edge Project boundary.</p>

	<p>The submission refers to waste processing infrastructure within the Ballymount Industrial Estate and submits that this this has been undermined by the rezoning of this area as 'REGEN'. The submission highlights the shortfall in national waste processing capacity in Ireland and the European and National legislative and policy requirements in this regard.</p> <p>The submission contends that it is essential that waste processing capacity is located as close to population centres as possible. Ballymount due to its proximity to the city and the M50 makes it an ideal location for waste infrastructure and that existing land use must be urgently considered by SDCC in creating a vision for the Ballymount area.</p> <p>The submission refers to a recent publication 'A Waste Action Plan for a Circular Economy – Ireland's National Waste Policy 2020-2025'.</p> <p>The submission requests that SDCC include within CS2 Objective 1, as revised by material alteration 2.4, a clear direction to undertake the necessary strategic work so that existing waste industry land uses within the boundary of the City Edge project are provided with sufficient options to relocate their businesses and vital services required to fulfil numerous policy objectives in relation to the circular economy.</p> <p>It is submitted that material alteration 2.4 be revised to include in its objective that the Council will actively pursue a</p>	<p>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 Naas Road City Edge Strategic Framework until such time as a Statutory Plan is in place. A relocation strategy is also to be prepared to facilitate and assist in identifying alternative zoned and serviced locations within and surrounding SDCC, particularly with respect to Waste Processing Facilities.</p> <p>Firstly, it should be noted that the intention of CS2 Objective 1 is to provide for, in policy, an objective to prepare a statutory plan for the zoned REGEN lands and other lands at Naas Road/Ballymount, now identified as the City Edge Project.</p> <p>Amendment 2.4 as proposed sets out the geographical area for the project; introduces the 'City Edge' name and sets out a timeline for commencement of the statutory plan. It is not the intent of this objective or the amendment which is subject to this stage of the development plan making process to set out the scope of the LAP or equivalent plan. City Edge Strategic Framework document has been.</p> <p>The City Edge Strategic Framework sets out a high level framework for the City Edge area as part of the background preparatory work for the LAP and was prepared in conjunction with Dublin City Council. The Framework was noted at a meeting of South Dublin County Council on 9th May 2022. The need for</p>
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	<p>relocation strategy within existing waste processing facilities located within the identified City Edge lands as follows:</p> <p>CS2 Objective 1</p> <p>To prepare a Local Area Plan or other appropriate mechanism for the zoned regeneration (REGEN) lands and other lands at Naas Road/Ballymount as defined by the City Edge Project boundary. 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 Strategic Framework until such time as a Statutory Plan is in place. A relocation strategy is also to be prepared to facilitate and assist in identifying alternative zoned and serviced locations within and surrounding SDCC, particularly with respect to Waste Processing Facilities.</p>	<p>business relocation from the City Edge lands to facilitate delivery of the longer term potential of these lands is recognised. The Framework notes that this will be a challenge and identifies a number of actions that will need to be progressed further in the coming years to enable this.</p> <p>The issues raised in the submission in respect to waste management policy is outside the scope of this amendment. However, the Draft Plan sets out provisions in Chapter 11, Section 11.5 including the current policy context at EU, National and Regional level which informs the Draft Plan policies and objectives in this regard.</p> <p>The following policies and objectives are noted:</p> <p><i>Policy IE6: Waste Management</i></p> <p><i>Implement European Union, National and Regional waste and related environmental policy, legislation, guidance and codes of practice to improve management of material resources and wastes.</i></p> <p><i>IE6 Objective 2:</i></p> <p><i>To support the implementation of the Eastern Midlands Region Waste Management Plan 2015-2021 or as amended by adhering to overarching performance targets, policies and policy actions.</i></p> <p><i>IE6 Objective 3:</i></p> <p><i>To provide for, promote and facilitate high quality sustainable waste recovery and disposal infrastructure/technology in keeping</i></p>
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		<p><i>with the EU waste hierarchy and to adequately cater for a growing residential population and business sector.</i></p> <p>In addition, with regard to employment zoned lands within the County, Amendment 2.9 is considered to be pertinent to the issues raised in the submission in relation to the identifying alternative zoned and serviced locations, particularly within SDCC, for waste processing. Amendment 2.9 introduces the following new objective:</p> <p>CS5 Objective 5:</p> <p>To ensure, that as part of the two-year statutory review of the Development Plan, an evidence-based analysis of employment lands, including the potential for agri-hub employment, 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">• Analysis of the type of employment need• Analysis of the appropriate location/s to serve such need and the appropriate zoning objective• Relevant National and Regional policy and proper planning and sustainable development. <p>Having regard to the above it is not considered that a further Modification to Amendment 2.4 and the wording of CS2 Objective 1 is required or appropriate.</p> <p>CE Response:</p>
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		No change to Amendment 2.4.
<p>SD-C226-59 John Spain Associates</p>	<p>This submission relates to Amendment 2.4 and the amended wording for CS2 Objective 1 in the CDP.</p> <p>The submission looks to amend CS2 Objective 1 to read as follows from:</p> <p><i>“To prepare a Local Area Plan or other appropriate mechanism for the zoned Regeneration (REGEN) lands and other lands at Naas Road/Ballymount as defined by the City Edge Project boundary. 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 Strategic Framework until such time as a Statutory Plan is in place.</i></p> <p><i>Note: All references to Naas Road/Ballymount Lands throughout Chapter 2 to be updated to City Edge/City Edge Strategic Framework.”</i></p> <p>To:</p> <p><i>“To prepare a Local Area Plan or other appropriate mechanism for the zoned Regeneration (REGEN) lands and other lands at Naas Road/Ballymount as defined by the City Edge Project boundary. The LAP or equivalent will commence in 2022 and provide a framework for the</i></p>	<p>CE Response:</p> <p>The development of the City Edge (Naas Road/ Ballymount) lands requires significant investment to enable their full development potential. The City Edge Strategic Framework sets out a high-level framework for the City Edge area as part of the background preparatory work for the LAP and was prepared in conjunction with Dublin City Council. The Framework was noted at a meeting of South Dublin County Council on 9th May 2022</p> <p>CS2 Objective 1 is making clear that a LAP or other appropriate mechanism will be prepared for the City Edge lands. The zoning of the County Development Plan takes precedence over a non-statutory plan such as the City Edge Strategic Framework. It is noted that the land uses envisaged in the Strategic Framework accord with the zoning in the Draft Plan. As such, there is no requirement for the proposed amended wording.</p> <p>CE Recommendation:</p> <p>No change to Amendment 2.4.</p>

	<p><i>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 primarily informed by the land use zonings under the Development Plan, whilst having regard to the City Edge Strategic Framework, until such time as a Statutory Plan is in place.</i></p> <p><i>Note: All references to Naas Road/Ballymount Lands throughout Chapter 2 to be updated to City Edge/City Edge Strategic Framework.”</i></p> <p>The submission believes the above amendment to be necessary, to ensure an objective of the CDP does not conflict with the EE zoning of specific lands under the CDP, as they are aware some proposals in the initial consultation process for City Edge may require alterations to the land use zoning context, and in those circumstances, the provisions of the ‘Strategic Framework’ of the future LAP would need to take into account the provisions of the Development Plan, having regard to the statutory provisions of the Planning and Development Act 2000, as amended.</p>	
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Chapter/ Section	Section 2.6.7 Monitoring of Growth / Active Land Management
Amendment ref.	Amendment 2.7
Page no.	59

Policy/Objective No.	Vacant Sites - 2.6.7 Monitoring of Growth / Active Land Management
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Text/Policy/Objective Amendment Wording

New Text under the heading Vacant Sites to be added to read:

Vacant development sites are both a challenge and an opportunity for the County to provide additional housing, employment and other uses. Active land management, including the implementation of the vacant site levy, is key to realising the vision and objectives of the Core Strategy.

The Urban Regeneration and Housing Act, 2015 provides for a levy to be applied on vacant sites in residential and regeneration zoned lands, which are suitable for housing but are not coming forward for development. The Act sets out two classes of land to which the levy may apply:

Residential land, under Section 10 (2)(a) and Section 10(2)(h) of the Planning Act 2000 (as amended).

In accordance with the Urban Regeneration and Housing Act, 2015, it is a key pillar of the Development Plan to promote the appropriate development and renewal of areas that are in need of regeneration, identified having regard to the Core Strategy, in order to prevent:

adverse effects on existing amenities in such areas, in particular as a result of the ruinous or neglected condition of any land;

urban blight and decay;

anti-social behaviour; or

a shortage of habitable houses or of land suitable for residential use or a mixture of residential and other uses.

Under Housing Policy Objective 15.2 of Housing for All, a new tax to activate land for residential purposes, and which will in time replace the Vacant Site Levy, has been introduced by the Department of Finance and the Revenue Commissioners in conjunction with the Department of Housing, Local Government and Heritage. The Residential Zoned Land Tax provisions of the Finance Act 2021 set out criteria to facilitate the identification of lands which fall within the scope of the tax, the aim of which is to activate and bring forward the development of housing on lands that are suitably zoned and serviced, as indicated on maps to be prepared by planning authorities for their respective functional areas. These maps are to be based on the local authority development plan and where relevant, local area plan zoning maps. The Residential Zoned Land Tax will come into operation on 1st February 2024 and will replace the Vacant Site Levy, which will remain operational until the new tax measure comes into effect.

Submission No.	Submission Summary	CE response and recommendation
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<p>SD-C226-49 Tallaght Community Council</p>	<p>The submission supports Proposed Amendment 2.7 and supports measures that actively tackle land hoarding that negatively impacts existing communities.</p>	<p>CE Response:</p> <p>The content of the submission is welcomed and noted in regard to active land management.</p> <p>CE Recommendation:</p> <p>No change to Amendment 2.7.</p>
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Chapter/ Section	Section 2.6.8 Employment Lands
Amendment ref.	Amendment 2.8
Page no.	61
Policy/Objective No.	Text Change - 2.6.8 Employment Lands
Text/Policy/Objective Amendment Wording	
<p>Amend text from:</p> <p>Baseline Analysis</p> <p>In terms of available lands for development of employment, SDCC carried out an analysis of available lands which have potential to generate jobs. Based on this analysis, there is a total capacity to develop 624 hectares to facilitate further employment. This land is made up of:</p> <ul style="list-style-type: none"> • 554ha of land zoned for Enterprise and Employment EE); • 55ha of land in Local, Village, District and Town Centres (zoned LC, VC, DC, and TC); • 7.6ha of employment generating lands within Strategic Development Zones • 5.8ha of land zoned Major Retail Centre (MRC); and • 1.2ha zoned Retail Warehousing (RW). <p>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 the above, there is 425ha of Regeneration (REGEN) zoned brownfield land forming part of the Tallaght Town Centre LAP and the Naas Road area.</p>	

While these lands currently provide a relatively low density of employees to land area, there is significant scope for re-intensification to accommodate higher density employment through a mix of uses while creating a more compact and efficient urban form.

To read:

Baseline Analysis

In terms of available lands for development of employment, SDCC carried out an analysis of available lands which have potential to generate jobs. Based on this analysis, there is a total capacity to develop ~~624~~ **675** hectares to facilitate further employment. This land is made up of:

- ~~554ha~~ **602ha** of land zoned for Enterprise and Employment (EE);
- ~~55ha~~ **58.27ha** of land in Local, Village, District and Town Centres (zoned LC, VC, DC, and TC);
- 7.6ha of employment generating lands within Strategic Development Zones
- 5.8ha of land zoned Major Retail Centre (MRC); and
- 1.2ha zoned Retail Warehousing (RW).

The totals above include additional lands consisting of 48ha net of EE and 3.27ha of LC zoned in the 2022-2028 Development Plan which were not part of the analysis.

Based on an assessment of employment on **the** existing zoned land, there is potential for ~~31,824~~ **34,503** jobs assuming an average of 51 jobs per hectare. In addition to the above, there is 425ha of Regeneration (REGEN) zoned brownfield land forming part of the Tallaght Town Centre LAP and the **Naas Road City Edge** area. While these lands currently provide a relatively low density of employees to land area, there is significant scope for re-intensification to accommodate higher density employment through a mix of uses while creating a more compact and efficient urban form.

Submission No.	Submission Summary	CE response and recommendation
SD-C226-49 Tallaght Community Council	<p>The submission welcomes the increase in Enterprise and Employment (EE) land capacity in the County. However, it is noted that this increase is not in Tallaght.</p> <p>The submission points out that rural land has been replaced with residential zoning at Kiltipper and Mount Seskin and employment land has been replaced by regeneration zoning at Whitestown. It is noted that the additional EE lands are located primarily at Greenogue, Clondalkin while local</p>	<p>CE Response:</p> <p>The welcoming of the increase in EE lands is noted. The submission does not suggest any amendment but requests clarity on the percentage of EE land in Tallaght.</p> <p>The 602 hectares referenced is undeveloped zoned EE land in the County, 2.3% of this is within the Tallaght Neighbourhood Area. A</p>

	<p>sports groups and business are being displaced in Cookstown with reduced possibilities of remaining in Tallaght. The submission raises concerns that Tallaght will be primarily apartment blocks.</p> <p>The submission requests clarity of the percentage of the 602 Hectares of which is based in Tallaght.</p>	<p>total of 5.7% of all EE zoned land, developed and undeveloped, is within Tallaght Neighbourhood Area.</p> <p>CE Recommendation:</p> <p>No change to Amendment 2.8.</p> <p>Note: No Amendment was proposed as part of this submission.</p>
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Chapter/ Section	Section 2.6.8 Employment Lands	
Amendment ref.	Amendment 2.9	
Page no.	62	
Policy/Objective No.	New CS5 Objective 5 - 2.6.8 Employment Lands	
Text/Policy/Objective Amendment Wording		
<p>New CS5 Objective 5 to be added to read:</p> <p>CS5 Objective 5:</p> <p>To ensure, that as part of the two-year statutory review of the Development Plan, an evidence-based analysis of employment lands, including the potential for agri-hub employment, 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"> • Analysis of the type of employment need • Analysis of the appropriate location/s to serve such need and the appropriate zoning objective • Relevant National and Regional policy and proper planning and sustainable development. 		
Submission No.	Submission Summary	CE response and recommendation
SD-C226-49 Tallaght Community Council	The submission welcomes Proposed Amendment 2.9 which provides for an evidence-based review every 2 years of	CE Response:

	<p>employment lands and amending of the same by way of variation if the need arises. However, the submission is concerned as to the loss of employment land through the current Proposed Amendment 2.19 and why this cannot be reviewed in 2 years through the needs analysis facilitated by this objective. The submission indicates that residential zoning does not revert back to employment or industrial and it is therefore considered to rezone employment now undermines this proposed review process.</p> <p>As stated above, the submission supports a regular review of employment lands, and requests that it allows for regeneration and residential zoning to revert to employment zoning if the evidence based assessments indicates such lands have not been developed or realised for employment purposes.</p>	<p>The submission welcomes Amendment 2.9 but is concerned at the loss of employment land on foot of proposed amendment 2.19 for lands at Whitestown.</p> <p>For clarity purposes it should be noted that the evidence-based review of employment lands will be carried out as part of the 2 Year Review of the Draft Plan in line with the provisions of Amendment 2.9 and not every 2 years as suggested in the submission.</p> <p>While the comments in relation to Amendment 2.19 at Whitestown on a proposed rezoning as part of the material amendments are acknowledged, it is the subject of a separate amendment which has been considered by the Chief Executive as part of the response and recommendation to that amendment.</p> <p>The review of employment land outlined in Amendment 2.9 will take account of the outcome of any amendments and the quantum and locations of different types of employment lands at the time of the review.</p> <p>CE Recommendation:</p> <p>No change to Amendment 2.9.</p>
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Chapter/ Section	Section 2.7.2 Self-Sustaining Growth Towns / Self-Sustaining Town - Saggart
Amendment ref.	Amendment 2.11
Page no.	71

Policy/Objective No.	New CS8 SLO 1 - 2.7.2 Self-Sustaining Growth Towns / Self-Sustaining Town And Amend Map No. 8	
Text/Policy/Objective Amendment Wording		
<p>New CS8 SLO 1 to be added to read:</p> <p>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.</p>		
Submission No.	Submission Summary	CE response and recommendation
<p>SD-C226-4 Rathcoole Community Council</p> <p>SD-C226-40 Cllr Trevor Gilligan PC</p> <p>SD-C226-25 Saggart Village Residents' Association</p>	<p>A number of submissions request that the reference to "Phase 1" in the Specific Local Objective (SLO) be removed as it implies that future phases are expected and informally approved.</p> <p>One submission highlights that an objection has been recorded to a planned SHD development on Mill road and indicates how South Dublin County Council (SDDC) roads department have sought clarification on the road network with regard to the City West Golf Club. The submission notes that the Draft Plan has not rezoned City West Golf Club to a residential zoning, and the submission considers that to allow for the SLO to specifically say 'Phase 1' of this development implies implicit approval of the masterplan submitted for the SHD on Mill Road which shows the City West Golf course</p>	<p>CE Response:</p> <p>The content of the submission is noted.</p> <p>There is a Strategic Housing Development (SHD) at Mill Road which is currently under consideration with An Bord Pleanala (ABP).</p> <p>With a particular focus on CS8 SLO1, in line with the provisions of NPO9 and the recommendations of the OPR, an SLO was deemed appropriate in order to guide the sustainable development of these lands in a manner which fully integrates with the adjoining lands to the south and provides the necessary and required social and physical infrastructure. It is acknowledged that the wording 'Phase 1' may lack clarity in this instance and may be misconstrued. In this regard, it is considered that the removal of the wording 'Phase 1' would be a minor modification to CS8 SLO1 and would provide for a clear and transparent objective.</p>

	<p>being removed and replaced by residential units in further "phase 2" of the proposed development which will be contrary to the zoning and the phased incremental approach to development of the Self Sustaining towns of Saggart, Rathcoole and Newcastle.</p> <p>The submissions therefore request that the New CS8 SLO 1 be amended to remove the word 'Phase 1' from text hence changing from:</p> <p><i>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.</i></p> <p>To Read:</p> <p><i>To facilitate the delivery of 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</i></p>	<p>Therefore, the minor modification to remove the wording 'Phase 1' from CS8 SLO1 is recommended.</p> <p>CE Recommendation:</p> <p>Minor modification to Amendment 2.11 to remove the wording 'Phase 1' to read as follows:</p> <p>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.</p>
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	<i>appropriate noise mitigation measures along the northern boundary.</i>	
Chapter/ Section	Section 2.7.2 Self-Sustaining Growth Towns / Self-Sustaining Town - Saggart	
Amendment ref.	Amendment 2.11	
Page no.	70	
Policy/Objective No.	Text Change - 2.7.2 Self-Sustaining Growth Towns / Self-Sustaining Town	
Text/Policy/Objective Amendment Wording		
Amend text from: 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.		
To Read: The Saggart settlement had a population in 2016 of 3,133 which is targeted to grow by 366 454 persons (11%) (13%) to 3,499 3,587 persons by 2028. Taking this growth over the plan period alongside estimated growth between 2017 and Q3 2022 of 244 people this equates to an overall growth of 698 (22%) persons over the period 2017 to 2028.		
SD-C226-40 Cllr Trevor Gilligan PC SD-C226-25 Saggart Village Residents' Association	The submissions welcome the inclusion of Saggart specific information in the updated infographic under Section 2.6.5 Core Strategy. The submissions request that the Council recognises the impact in which all future planning applications will have on physical and social infrastructure of Saggart and surrounding areas and stresses the importance of matching a population increase with necessary social resources to support it. It is requested that that the	CE Response: The content of the submission is noted and welcomed with regard to the support for the inclusion of Saggart specific information in the updated infographic under Section 2.6.5 Core Strategy. In regard to the issue of social and physical infrastructure aligning with population growth, it should be noted that Amendments 2.11, 2.12 and 2.13 provide specific objectives and provisions to ensure the same. Such provisions align with the National Planning

	<p>necessary resources and infrastructure be put in place to support the overall growth of 698 (22%) persons over the period 2017 to 2028. The revised unit allocations for Saggart, Rathcoole and Citywest are recognised.</p> <p>The submissions highlight that Saggart was identified in the South Dublin Development Plan 2016-2022 as a Self-Sustaining Growth Town and now the Draft Plan it is classed as a Self-Sustaining Town. It is considered that this demonstrates a need for physical and social infrastructure to be aligned with planning applications.</p> <p>The submissions note the Asset-Based Assessments which were conducted for Rathcoole and Newcastle in accordance with Appendix A of the Regional Spatial and Economic Strategy (RSES) and it is requested that that an asset-based assessment is completed for Saggart as the information in the assessments was useful.</p>	<p>Framework NPO9 and provide for the sequential and phased development of the area alongside the necessary and required social and physical infrastructure.</p> <p>In addition, Policy CS3: Monitoring Population and Housing Growth, CS3 Objective 6 of the Draft Plan is of particular note. CS3 Objective 6 states <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> It is therefore considered that the Draft Plan adequately recognises the need to ensure social and physical infrastructure is delivered in tandem with new development.</p> <p>The inclusion of Asset Based Assessments in the Appendices reflected the provision under the National Planning Framework, NPO9 to outline the proposed population growth for particular settlements for agreement with the Regional Assembly. The asset based assessments for Newcastle and Rathcoole were prepared in accordance with the information and guidance set out under Appendix A of the RSES. While a land capacity analysis was carried out for Saggart an assessment of this type was not required for Saggart and cannot be retrofitted into the Plan at this stage of the process.</p> <p>It should be noted that the Office of the Planning Regulator (OPR) highlighted a typographical error in Proposed Amendment 2.11 in relation to the percentage increase. The growth rate of 454 people represents an increase of c. 14% on the 2016 population for the</p>
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		<p>settlement and as such will be modified as indicated under Observation 1 of the OPR submission.</p> <p>CE Recommendation:</p> <p>Minor Modification Amendment 2.11 (section 2.7.2 Self-Sustaining Growth Towns / Self-Sustaining Town) – Please refer to the response and recommendation to the OPR submission (SD-C226-65).</p>
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Chapter/ Section	Section 2.7.2 Self-Sustaining Growth Towns / Self-Sustaining Town - Newcastle
Amendment ref.	Amendment 2.12
Page no.	72
Policy/Objective No.	<p>New CS9 Objective 4, CS9 SLO1, CS9 SLO2, CS9 SLO3, CS9 SLO4 - 2.7.2 Self-Sustaining Growth Towns / Self-Sustaining Town</p> <p>And Amend Map No. 7</p>
Consequential Amendment	<p>Consequential Amendment arising from Material Amendment 2.12</p> <p>View Consequential Amendments [PDF]</p>
Text/Policy/Objective Amendment Wording	
<p>Amend text from:</p> <p>The growth in Newcastle is mainly focused on the adopted Local Area Plan. It is estimated that the remaining units in current permissions will, at an average of 80 units per year, take 7 years to develop. The remaining LAP lands which could accommodate 886 units do not have permission to date. The continued growth of Newcastle will be dependent on the delivery of the phasing and infrastructure required in the LAP.</p> <p>The overarching principle for the town is to improve the social and physical services to provide for the growing population.</p> <p>To Read:</p>	

The growth in Newcastle is mainly focused on the adopted Local Area Plan. ~~It is estimated that the remaining units in current permissions will, at an average of 80 units per year, take 7 years to develop. The remaining LAP lands which could accommodate 886 units do not have permission to date. The continued growth of Newcastle will be dependent on the delivery of the phasing and infrastructure required in the LAP.~~ The overarching principle for the town is to improve the social and physical services **in tandem with a phased approach to development** to provide for the growing population. **A phased sequential approach to development from the village core to the north and south recognises the ongoing construction activity and the delivery of key infrastructure identified in the Newcastle Local Area Plan.**

And New CS9 Objective 4, CS9 SLO1, CS9 SLO2, CS9 SLO3, CS9 SLO4 to be added to read:

CS9 Objective 4: To facilitate and commit to 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 and commit to 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 and commit to 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 commit 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

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

Amend Maps No. 7, insert new CS9 SLO 1 -3 relating to phase 1 lands and SLO 4 relating phase 2 lands and amend the zoning to the west of Newcastle from Res-N to RU.

Submission No.	Submission Summary	CE response and recommendation
<p>SD-C226-38 Deputy Emer Higgins</p>	<p>The submission welcomes the provision of additional educational facilities in Newcastle and ask that the Council, in tandem with the Department of Education, devise a plan for providing a post-primary school to serve the children and young people of Newcastle.</p>	<p>CE Response:</p> <p>The content of the submission is welcomed and noted in regard to the provision of additional educational facilities in Newcastle.</p> <p>The request to devise a plan for providing a post-primary in the submission does not relate to this proposed amendment and therefore cannot be considered as part of this amendment at this stage of the process. However, it is noted that there is an objective in the form of COS8 SLO1 in the Draft Plan to identify a site for the appropriate location of a new post primary school within the Citywest / Saggart / Rathcoole / Newcastle neighbourhood area.</p> <p>CE Recommendation:</p> <p>No change to Amendment 2.12</p>
<p>SD-C226-63 Department of Education & Skills</p>	<p>The submission notes Amendment 2.12 Newcastle and the introduction of new objective CS9 Objective 4 which commits to the delivery of new residential development in a coordinated manner through appropriate phasing in line with the introduction of four new SLOs - CS9 SLO1, CS9 SLO2, CS9 SLO3 and CS9 SLO4. With regards to SLO3, the submission welcomes the approach to consult with the Department of Education on educational requirements.</p>	<p>The contents of the submission are noted.</p> <p>Amendment 2.12 includes the introduction of CS9 SLO3 as part of a set of new policy objectives in relation to Newcastle in line with the recommendations of the Office of the Planning Regulator (OPR) in their submission [SD-195-227] on the Draft Plan. 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</p>

	<p>Due to the pace of delivery of additional residential development along with updated enrolment and demographic data that the provision of this school should be kept under continuous review and inform the timing of school requirements. Therefore, rather than being prescriptive about the site transfer at this point, the submission requests that Amendment 2.12 be reworded to state the following:</p> <p><i>"With regards to the delivery of a new primary school at Taobh Chnoic, the need for this school and the timing of its provision will be subject to assessment of educational needs in consultation with the Department of Education. Consultation will take place with the Department prior to completion of 200 units to assess the need."</i></p> <p>The submission notes the introduction of SLO3 to Map 7 as per Amendment 2.12 and would like to add that any identified site should be appropriately located to allow for the efficient and timely development of any new development, in order to ensure that adequate and sufficient school provision is allocated to meet the needs of the local community.</p>	<p>and the redesignation of lands from Res-N to Rural in both settlements. Amendment 2.12 including CS9 SLO3 was developed in response to this recommendation from the OPR.</p> <p>It is noted that the OPR in their response to the Public Consultation on the Material Amendments to the Draft Plan state the following:</p> <p><i>"The Office welcomes many of the changes proposed as material Amendments to the draft Plan in particular the revised Housing Supply Target figures for the 6-year plan period and consequential revisions to the core strategy tables, the approach to moderate and phase the future growth of Rathcoole and Newcastle, and changes to ensure consistency with Part V of the Act."</i></p> <p>Amendment 2.12 includes the introduction of CS9 SLO3 which states:</p> <p><i>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."</i></p>
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		<p><i>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.</i></p> <p>In this regard, the submission requests that, rather than being prescriptive about the site transfer at this point, Amendment 2.12, and specifically CS9 SLO3 as proposed be reworded to state the following:</p> <p><i>“With regards to the delivery of a new primary school at Taobh Chnoic, the need for this school and the timing of its provision will be subject to assessment of educational needs in consultation with the Department of Education. Consultation will take place with the Department prior to completion of 200 units to assess the need.”</i></p> <p>Amendment 2.12 as proposed in respect to CS9 SLO3 indicates that that the timing of the delivery of a new primary school at Taobh Chnoic will be ‘<i>subject to educational needs in consultation with the Department of Education</i>’.</p> <p>It further indicates that prior to completion of 200 units ‘<i>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.</i>’</p> <p>It is considered that Amendment 2.12, in particular CS9 SLO3, which is in line with the OPR recommendation under SD-192-227,</p>
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		<p>is appropriate as currently set out. CS9 SLO3 supports early engagement with the Department of Education on the educational needs within this catchment area with a view to ensuring the delivery of a school at Taobh Chnoic in tandem with residential development, with need to be confirmed by the Department.</p> <p>The submission also notes the introduction of SLO3 to Map 7 as per Amendment 2.12 and would like to add that any identified site should be appropriately located to allow for the efficient and timely development of any new development, in order to ensure that adequate and sufficient school provision is allocated to meet the needs of the local community.</p> <p>In this regard, it is noted that the CS9 SLO3 symbol on Map 7 as indicated in Amendment 2.12 identifies subject lands which will require that a sequentially phased programme be submitted alongside any planning application which provides for the delivery of the following in tandem with development or as described:</p> <ul style="list-style-type: none">• 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;• Urban Park/Square c. 1ha in size (Burgage South Park);• East-West Link Street;• Sean Feirm Park c. 0.2ha in size;• a portion of Tower House Park c. 0.1ha; and
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		<ul style="list-style-type: none"> • Demonstrate to the satisfaction of the Planning Authority how they are supporting the delivery of North South Street connections to the Main Street. <p>The Proposed School site symbol on Map 7 to the southeast of the CS9 SLO3 symbol represents the designation of those lands as a Proposed School site under the Draft Plan, as per the Newcastle Local Area Plan. It should be noted that regular consultation with regard to assessment of educational needs and schools is carried out between the Council and Department of Education in accordance with the memorandum of understanding.</p> <p>Therefore, it is considered that no further amendment to Amendment 2.12 in particular CS9 SLO3 on Map 7 is required on foot of this submission.</p> <p>CE Recommendation:</p> <p>No change to Amendment 2.12.</p>
SD-C226-28 CAIRN Plc	<p>The submission indicates that lands in their ownership are located mainly to the south of the main street of Newcastle</p> <p>The submission sets out four requests:</p> <p>1. Proposed Amendment 2.12 (Amended Text)</p> <p>The submission notes their commitment on delivering elements of the Newcastle LAP as they relate to lands under their ownership. In this regard, the submission raises concern in relation to the text proposed in amendment no. 2.12 and recognises that some lands close to the town centre are not</p>	<p>The content of the submission is noted.</p> <p>1. Proposed Amendment 2.12 (Amended Text)</p> <p>The commitment on delivering those elements in the Newcastle LAP under the submitters control is noted and welcomed.</p> <p>With regard to other lands close to the town centre, it is noted that the provisions outlined in Proposed Amendment 2.12 align with the National Planning Framework (NPF) National Planning Objective (NPO) NPO9 and provide for the sequential and phased</p>

	<p>going to be brought forward for development due to their existing land use. The following text changes are proposed to the text paragraph.</p> <p>Amended Text to Read:</p> <p><i>The growth in Newcastle is mainly focused on the adopted Local Area Plan. It is estimated that the remaining units in current permissions will, at an average of 80 units per year, take 7 years to develop. The remaining LAP lands which could accommodate 886 units do not have permission to date. The continued growth of Newcastle will be dependent on the delivery of the phasing and infrastructure required in the LAP. The overarching principle for the town is to improve the social and physical services in tandem with a phased approach to development to provide for the growing population. A phased sequential approach to development from the village core and existing development to the north and south recognises the ongoing construction activity and the delivery of key infrastructure identified in the Newcastle Local Area Plan, where it can be delivered as part of a planning application on lands under the control of the applicant.</i></p> <p>2. Proposed Amendment 2.12 - CS9 SLO3 Part 1</p> <p>The submission highlights that specifying text as an ‘objective’ means that there is no flexibility in the application of the objective, as a planning authority may not materially</p>	<p>development of the area alongside the necessary and required social and physical infrastructure for the sustainable development of Newcastle.</p> <p>With respect to lands outside the control of the submitter, the introduction of explicit phasing requirements, which largely reflect the objectives within the adopted Local Area Plan, is to ensure the delivery of the necessary infrastructure in line with development in accordance with proper planning and sustainable development. The issues of individual ownership, while relevant to delivery, are not the overriding consideration in the application of land use zoning and phasing objectives. There may be instances where different landowners and/ or stakeholders will have to come together to ensure the necessary phasing can be progressed. The local authority will facilitate this insofar as is possible. The proposed amended wording may unduly hinder the delivery of the necessary infrastructure in a phased, sequential manner as set out in the objectives and as worded in the associated text.</p> <p>2. Proposed Amendment 2.12 - CS9 SLO3 Part 1</p> <p>The submission proposes the removal of the first part of CS9 SLO1 or alternatively an increase in unit figures under CS9 SLO3 Part 1 from 200 units to 340 units.</p> <p>The relevant part of CS9 SLO3 in this regard states:</p> <p>CS9 SLO3: A sequentially phased programme to be submitted alongside any planning application on the subject lands which</p>
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	<p>contravene an objective of the plan, without engaging in material contravention procedures. In addition, the submission notes that Section 5.1 of the Draft Development Plan Guidelines (DDPGs) requires that an objective should be capable of implementation, and it is contended that CS9 SLO3 part 1) is not capable of such implementation due to ownership issues. It is highlighted that the western portion of the Taobh Chnoic lands is not within the submitters control and therefore they will be unable to deliver such a planning application. The submission requests that the objective is omitted from the adopted Plan. However, it is noted that should the objective be retained, it is requested that the number of units is increased to consider the anticipated build out of lands within the ownership of the submitter located to the south of the Main Street. Therefore, the following text changes are proposed to CS9 SLO3 to include:</p> <p>CS9 SLO3: <i>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 200 340 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, to the satisfaction of the Planning Authority.</i></p>	<p><i>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</i></p> <p>The developer has indicated that ownership of the lands to deliver the full Taobh Chnoic Park is not within their control and that therefore this part of the objective should be omitted. However, they also suggest that an alternative to omitting the objective would be to increase the number of units permitted before the commencement of the remaining lands to deliver the Park. It is not clear how the increase in units proposed would overcome the indicated issue of land ownership. The proposed increase is considered inappropriate having regard to the figures set out in the Core Strategy. In their submission to the Draft Plan the Office of the Planning Regulator specifically requested that the settlements of Rathcoole, Saggart and Newcastle were revised to align with NPO9. The OPR in its recent submission (SD-C226-65) to the Proposed Amendments specifically states the “<i>Office welcomes the clarity provided in the revised core strategy tables and reduced allocations provided to the Self-Sustaining Growth Towns of Rathcoole and Newcastle. The above combined with the zoning changes and objectives introduced in response to Recommendation 3 and Observations 1 and 3 of the Office’s submission to the draft Plan provide for more sustainable and moderate growth of Rathcoole and Newcastle over the plan-period.</i>” As such, it would be inappropriate to increase the unit allocation which provides for the sustainable growth of 398 units</p>
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	<p>The submission is supported by a figure illustrating land ownership and physical and social infrastructure at Taobh Chonaic Park.</p> <p>3. Proposed Amendment 2.12 - CS9 SLO3 Part 2</p> <p>The submission indicates its commitment to delivering parts 3-5 and remainder text of CS9 SLO1.</p> <p>It is submitted that the Planning Authority recognises the reality in terms of ownership and the existing St. Finian's School, which renders the completion of the remainder of South Burgage Park unachievable. It is highlighted that the submitter has provided c. 0.19 hectares of Burgage South Park as part of the Graydon application. It is further noted that the northeastern portion of the Burgage South Park was permitted under an adjoining development to the north.</p> <p>However, the remainder of the lands are under the ownership of the Department of Education and Skills and therefore not within submitters control to deliver as part of any future planning application. The submission is supported by a figure illustrating land ownership.</p> <p>In light of this it is submitted that CS9 SLO3 – Part 2 is clearly not capable of implementation, and it is requested that it should be considered in the adopted Plan and omitted.</p> <p>CS9 SLO3:2) Urban Park/Square c. 1ha in size (Burgage South Park),</p>	<p>over the 6 year Plan period for Newcastle. Critically this would not equate to a minor amendment and therefore cannot be considered at this stage.</p> <p>The need for the delivery of the park and associated phasing has been set out in the Newcastle Local Area Plan since its adoption in 2012 and further extension of the LAP in 2018. The park was seen as an area with which the identified school site would share recreational facilities, and which was a key focal point not only for the Taobh Chnoic neighbourhood area but for the LAP lands as a whole. It is not considered appropriate to amend the requirement for the full park as part of the phasing of the Plan, particularly having regard to the extent of development which has already occurred within the LAP lands south of the Main Street.</p> <p>3. Proposed Amendment 2.12 - CS9 SLO3 Part 2</p> <p>The commitment to delivering on parts 3-5 of CS9 SLO3 is welcomed.</p> <p>Part 2 of the SLO is as follows:</p> <p><i>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</i></p> <p><i>2) Urban Park/Square c. 1ha in size (Burgage South Park),</i></p> <p>This park was set out in the Newcastle Local Area Plan. It is acknowledged that the final location of the park may not be exactly</p>
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	<p>4. Proposed Amendment 2.12 - CS9 SLO4</p> <p>The submission contends that the aspirations of CS9 SLO4 are already facilitated by CS9 SLO3 and as such is not required. It is further noted that there are no phase 2 lands designated and as such, it is requested the CS9 SLO4 be omitted in its entirety.</p> <p>CS9 SLO4: To commit 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.</p>	<p>where it was indicated in the LAP but the SLO on the lands (COS5 SLO 1) as part of the draft plan requires its delivery in the general vicinity of the identified area in the LAP. It is acknowledged that the delivery of the full Burgage South Park will take commitment and agreement from different landowners. However, it is not considered that this precludes its delivery. The local authority will proactively engage with the different landowners to help facilitate its delivery. It is considered that a slight modification to include at the end of this part of the objective, which reflects the phasing objective for Phase 2 lands set out in CS9 SLO4, would be appropriate and may facilitate delivery as follows:</p> <p><i>2) Urban Park/Square c. 1ha in size (Burgage South Park) to the satisfaction of the planning authority,</i></p> <p>4. Proposed Amendment 2.12 - CS9 SLO4</p> <p>The contents of the submission are noted. The phasing set out under the provisions for Newcastle as proposed under Proposed Amendment 2.12 refers to the phasing of development within parts of the overall settlement in order to deliver key pieces of infrastructure capable of being delivered within that particular area and not to individual or standalone landholdings.</p> <p>Under CS9 there four specific local objectives which provide for the sequential/phased approach to development. CS9 SLO 1, 2 and 3 provide for Phase 1 north and south of the main street and Phase 2 provides for infill lands to the east at Burgage Street, the development of which requires the completion of the Urban Park /</p>
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		<p>Square, Taobh Chnoic Park and the East/West Link Street required within Phase 1. The relevant lands to which the phasing applies are generally identified by the location of the SLO on the Development Plan maps.</p> <p>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. Furthermore, the OPR in its recent submission (SD-C226-65) to the Proposed Amendments specifically states <i>“welcomes many of the changes proposed as material amendments to the draft Plan in particular,…… the approach to moderate and phase the future growth of Rathcoole and Newcastle, and changes to ensure consistency with Part V of the Act.”</i> As such, it would be inappropriate and contrary to national and regional policy to remove such phasing.</p> <p>CE Recommendation:</p> <p>Minor Modification to CS9 SLO3 as follows:</p> <p>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</p>
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		<p>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) to the satisfaction of the Planning Authority, 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>
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Chapter/ Section	Section 2.7.2 Self-Sustaining Growth Towns / Self-Sustaining Town – Rathcoole
Amendment ref.	Amendment 2.13
Page no.	73
Policy/Objective No.	New - 2.7.2 Self-Sustaining Growth Towns / Self-Sustaining Town And Amend Map 07 and 08
Consequential Amendment	Consequential Amendment arising from Material Amendment 2.13 View Consequential Amendments [PDF]
Text/Policy/Objective Amendment Wording	
Amend text from:	

This level of growth is based on permissions available to commence within and adjoining the town and further growth will be at a rate that seeks to achieve a balance of service and infrastructure provision, focusing on consolidation along them main street.

Rathcoole has limited public transport provision and social services to date. Some improvements will be made as BusConnects brings improved services and overall accessibility to Celbridge, Dublin City Centre, Grangecastle, Hazelhatch train station and Saggart Luas Stop. It is important that Rathcoole develops at an incremental pace, based on the delivery of social, physical and transport infrastructure and services. The capacity of zoned lands is considered to be sufficient to meet long term demand for the settlement.

To Read:

This level of growth is based on ~~permissions available to commence within and adjoining the town and further growth will be at a rate that seeks to achieve a balance of service and infrastructure provision, focusing on consolidation along them main street.~~ **a phased approach to development to ensure alignment with investment in infrastructure and the provision of employment, together with supporting amenities and services.**

Rathcoole has limited public transport provision and social services to date. Some improvements will be made as BusConnects brings improved services and overall accessibility to Celbridge, Dublin City Centre, Grangecastle, Hazelhatch train station and Saggart Luas Stop. It is important that Rathcoole develops **through a phased approach and at** an incremental pace, based on the delivery of social, physical and transport infrastructure and services. The capacity of zoned lands is considered to be sufficient to meet long term demand for the settlement.

Delete CS10 SLO1:

~~CS10 SLO 1: 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.~~

And New CS10 Objective 4, CS10 SLO1 and CS10 SLO2 to be added to read:

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.

And:

Amend Maps No. 7 and No. 8 revising the zoning as indicated in the maps below from RES N New Residential to RU Rural, from OS Open Space to RU Rural, from OS Open Space to RES-N New Residential on lands adjacent to Rathcoole Park to the southeast of Rathcoole and removing the boundary of CS10 SLO1, Adjusting the location of the school site and Traveller Accommodation map based objectives to reflect CS10 Objective 4, new CS10 SLO1 and CS10 SLO2. Amend the zoning to the west of Rathcoole from Res-N to Strategic Residential Reserve Lands and from RES-N New Residential to RU Rural.

Submission No.	Submission Summary	CE response and recommendation
<p>SD-C226-13 Samuela Finn</p> <p>SD-C226-12 Francesco Perrone</p> <p>SD-C226-14 Ne Graver</p> <p>SD-C226-82 alistair mullan</p> <p>SD-C226-56 Niall Healy</p> <p>SD-C226-71 Eugene McElhinney</p> <p>SD-C226-74 Alice Magee</p> <p>SD-C226-17 Litter Mugs</p> <p>SD-C226-42 Sally Graver</p> <p>SD-C226-73 Orla Daly</p>	<p>Rathcoole Woodlands Rezoning Requests</p> <p>Three main requests have arisen out of a large number of submissions made on Proposed Amendment 2.13.</p> <ul style="list-style-type: none"> It is requested that the lands adjacent to Rathcoole Park to the southeast of Rathcoole, be revised from RU ‘Rural’ to RES-N ‘New Residential.’ This submission is of the view that the last round of County Development Plan (CDP) deliberations, has jeopardised the viability of the provision of housing, a primary school and football pitches. It is requested that all the rewilding area (land owned by SDCC, the GAA and the Dept of Education) is protected, in relation to zoning amendments proposed to Map 8 and it is requested that where the rewilding area overlaps with the Res – N in the zoning map accompanying CS10 SLO1, along with the proposed rural zoning; that these 	<p>The content of multiple submissions relating to Rathcoole Woodlands area and its environs are noted and have been broken down into the following 4 broad headings.</p> <p>Rathcoole Woodlands Rezoning Proposals, Concept and Zoning Proposal, Ecological Reports/Assessment, Habitats/Rewilding/Green Infrastructure</p> <p>Rathcoole Woodlands Rezoning Proposals</p> <p>A number of submissions were received with regard to rezoning proposals for all and partial aspects of the subject lands. Similarly, the request to amend the wording of CS10 SLO1 would by default rezone the lands in their entirety. In this regard, it is noted from the outset that an increase in land zoned for any purpose cannot be considered at this stage of the plan making process as stated in Section 12 (10) (c) of the Planning and Development Act 2000 (as amended):</p> <p><i>“A further modification to the alteration –</i></p>

<p>SD-C226-78 Nessa Darcy SD-C226-52 Four Districts Woodland Habitat Group SD-C226-26 South Dublin Conservation Society SD-C226-81 Shay Nolan SD-C226-29 Four Districts Woodland Habitat Group SD-C226-44 John O'Leary SD-C226-76 Katie Goodwin SD-C226-63 Department of Education & Skills</p>	<p>lands be changed to one of the following zoning objectives, in order of preference:</p> <ul style="list-style-type: none"> • Nature/Biodiversity Conservation Zoning (new zoning) • High Amenity Zoning • Rural Zoning <p>With respect to zoning requests, it is noted that other submissions request that the lands be incorporated together as Parkland/Public Open Space and be rezoned accordingly as Objective OS 'Open Space' and it is suggested that the school and library hub be relocated near the village centre of Rathcoole while one submission considers a high amenity zoning to be an appropriate zoning for the entire rewilding area to be protected.</p> <ul style="list-style-type: none"> • It is requested that CS10 SLO1 be replaced to read as follows: <p><i>To ensure that the lands adjacent to Rathcoole Park are preserved "for its mosaic of Annex I (priority) habitats, species-rich semi-natural habitats, heritage value hedgerows, wetland habitats and mosaic of wooded and non-wooded semi-natural habitats which are rare in County Dublin". Negative construction impacts should be avoided that affect the hydrology and ecology of the area. These lands should be zoned appropriately to ensure preservation.</i></p>	<p>(i) <i>may be made where it is minor in nature and therefore not likely to have significant effects on the environment or adversely affect the integrity of a European site,</i></p> <p>(ii) <u>shall not be made where it relates to – (I) an increase in the area of land zoned for any purpose,</u> or (II) an addition to or deletion from the record of Protected Structures". [Emphasis added]</p> <p>As such, the proposals submitted to rezone lands to Rural/High Amenity/Open Space/RES-N cannot be considered under legislation. Proposed Amendment 2.13 can either be accepted (with only 'minor in nature' modifications possible) or omitted, in which latter case the zoning and associated objectives as set out in the Draft Plan will remain.</p> <p>It is noted that the rezoning of the alluvial woodland lands to Rural - RU amending the Draft Plan zoning of New Residential - RES-N was put forward in Motions 73868 and 73938 to the Draft Plan and were voted through by the Elected Members at the Council Meetings in March 2022. Following a comparison of the zoning proposal for the subject lands in the Draft Plan and the zoning proposals put forward under Proposed Amendment 2.13 it is considered that the rezoning of further lands to RU, amending the Draft Plan zoning of RES-N, together with the inclusion of an Specific Local Objective (SLO) on the RU lands to protect the woodlands recognises the significant ecological value of this area, and comprehensively provides for the protection and enhancement</p>
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	<p>A number of issues and concerns were raised to support the above requests together with supporting documentation. The issues and concerns are as follows:</p> <p>Concept and Zoning Proposal - Appendix 2A: Rathcoole Land Use Concept and Zoning Proposal</p> <p>A number of questions and queries are raised to include the following:</p> <ol style="list-style-type: none"> 1. It is submitted that the zoning proposed as part of the material alterations is only in part now supported by the Concept and as such how can the proposals for the area be delivered. 2. The proposal to remove the boundary of CS10 SLO1 is questioned, and it is queried whether the objectives can be delivered on any of the lands adjacent to Rathcoole Park and the underlying reason for this proposal. 3. It is considered that the Concept is noticeably light by way of text, explanation, and expansion on thinking/progression, leaving it open to interpretation and difference in maps identified. 4. The submission questions how the proposal can be integrated with development and overall protection of the flora and fauna of this area. 5. It is contended that the presence of a water wayleave under existing grasslands is a constraint that precludes rezoning to Res – N and therefore Open Space is the only option. 	<p>of the same whilst still facilitating a reduced area of RES-N zoning for much needed social and affordable housing, a primary school and community and sporting facilities.</p> <p>As such, having considered the proposals for rezoning the entire area to Rural/High Amenity/Open Space, notwithstanding the fact no additional land may be zoned under legislation, it is contended that Proposed Amendment 2.13 will still allow for consideration of a multi-disciplinary approach to sensitively deliver a revised quantum of much needed social and affordable housing and community facilities while minimising disturbance to important habitats and features. In this regard, it is recommended that proposed Amendment 2.13 should remain as currently worded.</p> <p>Concept and Zoning Proposal</p> <p>The concept and zoning proposals document was prepared in order to address the SLO in the Draft Plan for a study of the lands including 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> <p>As an outcome of these investigations, a preferred land use arrangement and re-zoning proposal was recommended by the Chief Executive (CE) and incorporated into Appendix 2A and 2B of the CE Report on the Draft Plan for the consideration of the</p>
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	<p><u>Ecological Reports/Assessment</u></p> <ul style="list-style-type: none"> • It is contended that supporting documentation has not been subject to public consultation. • Concerns are raised regarding the lack of an Ecological Impact Assessment being conducted. • It is highlighted that no field based hydrological assessment has been conducted and that <i>'This Priority Annex I habitat is a water dependent habitat; therefore, any activity (within or adjacent to the site) that alters site hydrology could negatively impact the woodland.'</i> according to Daly 2020 unpublished. • Differences are pointed out between the Ecological Assessment Of lands at Rathcoole - Appendix 2b and the Hodd Report 2021. • It is pointed out that while the surveying is comprehensive it is limited to one season and one year. • Timing of surveys - Badger and large mammal surveys conducted out of season due to COVID. <p><u>Habitats/Rewilding/Green Infrastructure</u></p> <ol style="list-style-type: none"> 1. It is requested that habitat classifications are recorded prior to zoning land and that implications of such zonings are considered at a river basin catchment scale. 2. It is requested that the zoning of the 'wildflower meadow' to RES-N should be reconsidered as this area is deemed 	<p>Elected Members resulting in the consequent public consultation on the proposed Material Amendment.</p> <p>It is considered that the rezoning and related SLO, the subject of the Amendment, will ensure the protection and augmentation of the majority of the alluvial woodlands, whilst providing for a reduced area of RES-N zoning for much needed social and affordable housing, a primary school and community and sporting facilities. Having regard to the reduced area of RES-N zoning, further investigation of the capacity of the RES-N lands to deliver housing and the different community and sporting facilities will be undertaken. A detailed and comprehensive proposal for the subject lands will be delivered through a planning application which will be determined on its own merits through the development management system and will be assessed against the policy and objectives of the County Development Plan. Planning applications are subject to public consultation. Any planning application on the subject lands will be accompanied by the relevant and required environmental reports and supporting documentation.</p> <p>The concept proposal was developed to inform the appropriate zoning for the lands having regard to the requirements outlined in CS10 SLO1 of the Draft Plan. While the comments on the concept proposal with regard to text and explanation are noted, it is considered that the concept included an appropriate level of information to inform the rationale for the revised zoning proposals.</p>
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	<p>to be valuable for wildlife and is currently used for activities.</p> <p>3. It is considered the proposed objective, and the amended zoning will adversely impact bat, birds species that live, breed and feed in this area.</p> <p>4. It is highlighted that Areas of grassland encircled by Woodland at various stages of maturity will in time become annex woodland habitat if left and some of the grassland, if managed, could become lowland hay meadow.</p> <p>5. It is requested that Rathcoole Woodlands as a Core Area is reconsidered.</p> <p>6. It is considered that additional grey infrastructure which is required for the RES-N lands will reduce the connectivity in this area.</p> <p>Supporting documentation submitted with or referred to in the submissions comprises of the following:</p> <ul style="list-style-type: none"> • A map outlining a boundary of the area requested for RES-N zoning; • A map outlining a boundary of the area requested for high amenity zoning; • A video showing the rewilding area along with the Alluvial protected Woodlands; • A map of the area overlapped by the proposed zoning and how it sits over rewilded areas; 	<p>As outlined above, further levels of detail will be required at planning application stage of any development.</p> <p>The submissions refer to a water wayleave presence and as such it precludes any development on the subject lands. In this regard it should be noted that a Strategic Hydrological Assessment has been carried out as part of the Strategic Flood Risk Assessment (SFRA) to inform the Draft Plan which has also included the subject lands to inform and identify riparian corridors. Should a more detailed hydrological Assessment be required as part of any planning application and related environmental reports, it will be carried out at that stage. The presence of a wayleave does not automatically preclude development where it can be incorporated into the layout and design of a development.</p> <p>Ecological Reports/Assessment</p> <p>In support of the rezoning proposal put forward in the submissions, a number of issues or queries were highlighted in relation to ecological reports and assessments.</p> <p>On foot of CS10 SLO1 detailed habitat assessments were carried out on the subject lands. As an outcome of these investigations, a preferred land use arrangement and re-zoning proposal was recommended by the CE and incorporated into Appendix 2A and 2B of the CE Report on Draft Plan. Submissions have indicated that these particular documents were not subject to public consultation. In this regard it is noted that Appendix 2A and 2B of</p>
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	<ul style="list-style-type: none"> • An aerial image of the area with the specific habitats overlaid; • Specific statements form: Ecological Assessment Of lands at Rathcoole, Co. Dublin Final Report,2021 Appendix 2b; A survey to assess the woodlands and associated semi-natural habitats at Rathcoole, Co. Dublin Rory Hodd, August 2021, unpublished; and Rathcoole Woodland, Co. Dublin. Report of a visit by Woodlands of Ireland, August 2020, Joe Gowran, Woodlands of Ireland, Unpublished, 2020. • An extract from Guidance for Planning Authorities on Drainage and Reclamation of Wetlands consultation draft September 2011 in Appendix II of the submission; • References from the Hydrological Assessment; Rathcoole, Co. Dublin, Envirologic, 2022, unpublished; • A Figure extract from Appendix 2b illustrating bat activity over the lands at Rathcoole: • Reference to Survey Site, Rathcoole, Co. Dublin Wintering Bird Report 03 May 2021, JBA Consulting Unpublished; • Extract from the Faith Wilson Ecological Reports and • A figure illustrating a selection of habitat types and their reported conservation status. <p>School Provision - CS10 SLO1</p> <p>The Department of Education notes Amendment 2.13 introduces a new objective CS10 Objective 4 that proposes to insert CS10 SLO1 on the land adjacent to Rathcoole Park</p>	<p>the CE Report on the Draft Plan was made available to the public both on the South Dublin County Council Website Site and the dedicated Development Plan website in December 2021. It is highlighted that the submitters have referenced both such documents in detail in their submissions and as such have viewed and made a submission on it through this current public consultation stage. Submissions/observations in respect of the Proposed Amendments to the Draft Plan were accommodated via hard copy or via the public consultation portal.</p> <p>Detailed ecological and habitat assessments were carried out on the subject lands by a team of ecologists with the relevant specialist experience in the survey, assessment and monitoring of grassland and wetland habitats including Annex I Alluvial Woodlands and Annex I Lowland hay meadows. As a result, flora and fauna were comprehensively assessed.</p> <p>The carrying out of an Environmental Impact Assessment (EIA), as opposed to an ecological impact assessment, is mandatory for the types of development listed in Part 1 or Part 2 of Schedule 5 to the Planning and Development Regulations 2001, as amended and would accompany a planning application where required. Individual planning applications are determined on their merits through the development management process and its implementation of policy in the County Development Plan (CDP) and National and Regional policy. It is also worth highlighting that the subject lands have been subject to environmental assessment at a strategic level</p>
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	<p>which is to ensure the provision of a primary school, library hub, two full size GAA pitches and one junior pitch and associated pavilion, access road and open space is provided in tandem with new residential development.</p> <p>The submission notes that the amendment proposes to adjust the location of the school site on the relevant map. In this regard, the submission indicates that any identified site should be appropriately located to allow for the efficient and timely development of any new school in order to ensure that adequate and sufficient school provision is allocated to meet the needs of the local community.</p>	<p>as part of the Strategic Environmental Assessment (SEA) and an Appropriate Assessment (AA) prepared in respect of the Draft Plan and Proposed Amendment 2.13. These assessments include consideration of secondary, cumulative, synergistic, short, medium, and long term, temporary and permanent, positive, and negative effects.</p> <p>With regard to differences and discrepancies between the Ecological Assessment Of lands at Rathcoole - Appendix 2b and the Hodd Report 2021, it is noted that the Council cannot comment upon the Hodd Report 2021 as this was an independent study carried out. However, it is highlighted that the Ecological Assessment Of lands at Rathcoole as presented in Appendix B was carried out by a team of ecologists that comprehensively investigated the lands and included a specialist with experience in the survey, assessment and monitoring of grassland and wetland habitats including Annex I Alluvial Woodlands and Annex I Lowland Hay Meadows. Comments in relation to timing of the assessments are noted. However, the assessments are considered to have been sufficiently thorough to inform the concept proposal and resultant zoning proposal. As indicated above, any development lands will be further environmentally assessed as required as part of any future planning application.</p> <p>Habitats/Rewilding/Green Infrastructure</p> <p>Habitat classification was carried out as part of the ecological report and informed the proposed rezoning and protection of the</p>
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		<p>alluvial woodlands and hay meadow. The inclusion of riparian corridors and associated policy in the Draft Plan is a direct response to the Water Framework Directive under which river basin management plans are implemented. It is noted that the third draft river basin management plan was subject to public consultation by the government up to 31st March 2022.</p> <p>The impact of future development on protected species, such as bats, would have to be assessed at as part of any planning application.</p> <p>The issues of connectivity on the subject lands would have to be considered as part of any future planning application having regard to the policy and objectives in Chapter 4 Green Infrastructure and the overall Green Infrastructure Strategy.</p> <p>The consideration of the Rathcoole Woodlands as a Core Area took place at the Draft Plan stage and formed part of the CE Report on the Draft Plan which was considered by the Elected Members. Proposed Amendment 4.10 was the result of the Elected Members consideration and acceptance of this issue in Motion meetings in March 2022 and as such no change to Proposed Amendment 4.10 is recommended. In this regard it is recommended under proposed Amendment 4.10 that Rathcoole Woodlands will be designated as a stepping stone with an associated objective in the Draft Plan.</p>
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		<p>With regard to the areas for rewilding and grassland, it is again noted that Section 12 (10) (c) of the Planning and Development Act (as amended) states that “a further modification to the alteration..... Shall not be made where it relates to (i) an increase in the area of land zoned for any purpose”.</p> <p>School Provision CS10 SLO1</p> <p>The content of the submission in regard to CS10 SLO1 is noted and accepted with regard to appropriately locating the school site to allow for the efficient and timely development of same in order to ensure that adequate and sufficient school provision is allocated to meet the needs of the local community.</p> <p>The siting of a proposed school at this location will be considered from the perspective of making efficient use of scarce lands and sharing facilities and ensuring early, deliverable access to the school. This approach is in line with guidelines on the Identification and Suitability Assessment of Sites for Primary Schools (DES, 2019).</p> <p>CE Recommendation: No change to Proposed Amendment 2.13.</p>
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Chapter/ Section	Individual Zoning Amendment
Amendment ref.	Amendment 2.14

Page no.	Map No. 9
Policy/Objective No.	Map No. 9 – Elder Heath

Text/Policy/Objective Amendment Wording

Amend Map No. 9 from zoning **Objective RES - Existing Residential to accurately align with 60m clearance and safety zone of the existing Carrickmines-Dunstown 220kV transmission line.**

And

Amend Map No. 9 to rezone where the lands extended south beyond the 60m clearance, Objective RU - ‘To protect and improve rural amenity and to provide for the development of agriculture’ to align with the remaining lands to the south.

Submission No.	Submission Summary	CE response and recommendation
<p>SD-C226-7 Laura Duez</p> <p>SD-C226-49 Tallaght Community Council</p>	<p>One submission welcomes the recognition to amend the zoning from residential to rural.</p> <p>Another submission is generally supportive of the subject land at Elder Heath not being zoned for development. This submission also raises the following additional issues in regard to a submission made to the Draft Plan on these lands.</p> <ol style="list-style-type: none"> 1. That no anti-social behavior takes place on the subject lands, which is contrary to that stated by Kelland Homes in their submission to the Draft Plan; 2. That the subject lands support significant flora and fauna including foxes, deer, pheasants, a huge variety of birds, bats and other mammals in addition to trees and hedgerows; and 	<p>CE Response:</p> <p>The general support for the amendment is welcomed.</p> <p>With regard to the surveying and protection of the subject lands, it is noted that the lands are in private ownership, and this is outside the scope of the Development Plan.</p> <p>The view of the CE remains unchanged, and it is noted that this rezoning proposal was put forward as a recommendation in the CE Report to the Draft Plan under submission SD-C195-232 and accepted by the Elected Members under headed items at the Council Meeting on 9th March 2022.</p> <p>CE Recommendation:</p> <p>No change to Amendment 2.14.</p>

	3. That the subject lands should surveyed and protected.	
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Chapter/ Section	Individual Zoning Amendment	
Amendment ref.	Amendment 2.15	
Page no.	Map No.9	
Policy/Objective No.	Map No. 9 – Kiltipper Road	
Text/Policy/Objective Amendment Wording		
Amend Map No. 9 from Objective RU – Rural and Agriculture– <i>‘To protect and improve rural amenity and to provide for the development of agriculture ‘</i> To Objective RES - Existing Residential – ‘To protect and/or improve residential amenity’		
Submission No.	Submission Summary	CE response and recommendation
SD-C226-69 Aidan Lawlor SD-C226-49 Tallaght Community Council SD-C226-26 South Dublin Conservation Society	<p>The submissions request that the residential zoning of the subject land be rejected, and the rural zoning be retained.</p> <p>It is pointed out that the subject lands have already been developed with residential dwellings and the RU zoning of the lands under the Draft Plan will still allow for the subject dwellings to be extended/refurbished or replaced (if necessary) in accordance with proper planning and sustainable development. It is considered that in the context of the location of the site, in an elevated position at the edge of the rural metropolitan consolidation area; its development</p>	<p>CE Response:</p> <p>The lands in question comprise of 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 Housing Development.</p>

	<p>status; the surplus requirement for additional residential zoned lands and potential access and road layout implications, the proposed zoning would neither be appropriate or necessary.</p> <p>Reference is made to the CE Report on the Draft Plan which states <i>"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. 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 inappropriate and premature to rezone the subject lands."</i> And suggests that Amendment 2.15 is contrary to the recommendations of the Planning Regulator and section 4.4.3 of the Development Plan Guidelines.</p> <p>It is highlighted that the Kiltipper Road is a very narrow road, with no footpaths in many places, making pedestrian movement extremely difficult and there is very little public transport which serves this area. It is noted that new residential units located adjacent to the Thomas Davis Astro Pitches has added to the volume of traffic on this narrow road which appears to have no scope to be upgraded. The submission also considers Proposed Amendment 2.15 to be ad hoc when the land to the rear (subject to Proposed Amendment 2.14) is being rezoned to rural.</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 partial RES zonings, should be included in the RES rezoning. It is considered that the zoning objective RES 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>Table 10: Indicative Capacity of Additional Zoned Lands in the South Dublin County Development Plan 2022-2028 as proposed under Amendment 2.1 indicates a potential unit capacity of 10 units at this location. It is not considered that this will undermine the core strategy of the Development Plan. Furthermore, the Office of the Planning Regulator (OPR) has stated in their submission to the Proposed Amendments (SD-C226-65) that <i>"..... new Table 10 (Indicative Capacity of Additional Zoned Lands), it is considered that the response to Recommendation 2 (i) is generally acceptable."</i></p> <p>With respect to the site conditions and location in terms of road safety and transport, it is noted that individual planning applications are determined on their merits through the development management system and its implementation of policy in the County Development Plan (CDP) and National and Regional policy. As such, any planning</p>
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	<p>It is therefore considered that this residential zoning be rejected as it will have a negative impact on pedestrians and road safety as well as add to private transport and that the RU zoning be retained as in the draft plan.</p> <p>It highlighted that all the additional assessment wording proposed in the Natura Impact Report for the Draft South Dublin County Development Plan 2022-2028 prepared by the Scott Cawley which aim to strengthen protection and avoid damage to the existing natural environment SDCC and in particular the NATURA 2000/European conservation sites downstream is commended. It is noted that the general assessment wording used where potential for significant negative effects on European Sites are identified. In such instances it is suggested that the precautionary principle should apply, and the subject lands should not be zoned for such activities</p>	<p>application on the subject lands will be assessed against and will be required to comply with the policies and objectives as set out in the CDP.</p> <p>The commendation with respect to the NIR assessment is welcomed and it is noted that the protective policies and objectives already contained in the Draft Plan are sufficient to mitigate against any adverse potential significant effects on European sites either in the county or within the zoning of lands of the Draft Plan, including from any proposed material amendments/alterations to the Draft Plan.</p> <p>The view of the CE remains unchanged, and it is noted that this rezoning proposal was put forward as a recommendation in the CE Report to the Draft Plan under submission SD-C195-232 and accepted by the Elected Members under headed items at the Council Meeting on 9th March 2022.</p> <p>In this context it is considered appropriate that the proposed zoning remains.</p> <p>CE Recommendation:</p> <p>No change to Amendment 2.15.</p>
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Chapter/ Section	Individual Zoning Amendment
Amendment ref.	Amendment 2.18

Page no.	Map No.8	
Policy/Objective No.	Map No. 8 – Mount Seskin	
Text/Policy/Objective Amendment Wording		
Amend Map No. 8 to change from Objective OS – Open Space – <i>‘To preserve and provide for open space and recreational amenities’</i> To Objective RU - ‘To protect and improve rural amenity and to provide for the development of agriculture’		
Submission No.	Submission Summary	CE response and recommendation
SD-C226-49 Tallaght Community Council	The submission welcomes and supports the recognition of rural activities in Tallaght ensuring it continues into the future.	CE Response: The content of the submission is welcomed and noted in regard to the rezoning of Open Space to Rural at this location. CE Recommendation: No change to Amendment 2.18.

Chapter/ Section	Individual Zoning Amendment
Amendment ref.	Amendment 2.19
Page no.	Map No. 9
Policy/Objective No.	Map. No 9 – Whitestown Way
Text/Policy/Objective Amendment Wording	
Amend Map 9 to change from: Objective EE – <i>‘To provide for enterprise and employment related uses’</i>	

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.’

Submission No.	Submission Summary	CE response and recommendation
<p>SD-C226-49 Tallaght Community Council</p> <p>SD-C226-10 Office of Public Works</p>	<p>Two submissions raise concerns regarding the rezoning of the subject lands at Whitestown with regard to displacement of employment lands and flooding.</p> <p>With respect to flood risk, it is highlighted that material alteration number 2.19 rezones lands from Enterprise and Employment to Regeneration which can allow highly vulnerable development. The submission points out that the combined SEA, AA, SFRA Assessment has stated that an SFRA assessment of these lands is not applicable, however it is noted that these lands overlap with Flood Zones A and B. The submission indicates that highly vulnerable development is not appropriate in Flood Zones A or B unless the specific zoning has been assessed against and satisfied all criteria of the plan making Justification Test.</p> <p>It is pointed out that the area of Whitetown is an Industrial Estate in nature and it's pointed out that this area has already been ceded for green space for The Weir apartments in Sean Walsh Park. Furthermore, the submission notes that there is currently a valid planning permission for a petrol garage and food court at this</p>	<p>The content of the submission is noted.</p> <p>The subject site is located within an established industrial setting with general employment uses. It is 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>It noted that the rezoning of the subject lands from Employment and Enterprise - EE to REGEN was requested under SD-C195-143 to the Draft Plan and the view of the CE remains unchanged in this regard.</p> <p>The rezoning of the subject lands from EE to REGEN were considered under the justification test for “Existing, developed, High Vulnerability Zonings Flooding”. The flood mapping produced as part of the CFRAMS indicates that flooding is limited to the perimeter of the site. It is considered that flood risk could be adequately and appropriately managed as per the Justification Test and the sequential approach to development which would avoid the encroachment or loss of the flood plain.</p> <p>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</p>

	<p>location. It is considered that this is permitted regeneration and therefore the site does not require the rezoning.</p> <p>It is highlighted that the employment industry has been displaced in Cookstown and Broomhill with jobs moving out of Tallaght to Sandyford, Greenogue and Citywest due to the regeneration zoning which now provides for residential units. It is contended that the rationale behind the regeneration zoning was to allow people to live and work and reduce car reliance however the submission considers that this has not happened due to the lack of employment in Cookstown.</p> <p>It is considered the rezoning to be premature in light of Proposed Amendment 2.9 where a review will be carried out in 2 years.</p> <p>Proposed Amendment 2.19 is rejected, and it is further noted that there is no phased approach to development to ensure alignment with investment in infrastructure and the provision of employment, together with supporting amenities and services. In this regard, it is contended that the any rezoning for lands that provide for residential should be associated with a corresponding objective i.e CS9 Objective 4: To facilitate and commit to the delivery of new residential development in a coordinated manner, ensuring alignment with investment in infrastructure and supporting amenities and services.</p>	<p>requested given the existing quantum of REGEN land in the immediate area, the on-going need for general employment lands. The proposal to rezoned to REGEN would potentially facilitate employment but, as is more likely to come forward, it would also facilitate residential development. The lands as currently zoned under the zoning EE would allow for a denser form of employment but would not facilitate residential. Given that there is sufficient capacity of zoned residential land in the County and the need to continue to facilitate employment lands, the proposed rezoning to REGEN is not considered appropriate. 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>Furthermore, new objective CS5 Objective 5 proposed under Proposed Amendment 2.9 facilitates an evidence-based analysis of employment land as part of the two-year statutory review of the Development Plan. Therefore, to rezone the subject lands without the necessary evidence base would be in appropriate and premature.</p> <p>It is therefore considered that Proposed Amendment 2.19 be omitted, and the subject lands remained zoned Employment and Enterprise as per the Draft Plan.</p> <p>CE Recommendation:</p> <p>Omit Proposed Amendment 2.19 and retain the Employment and Enterprise Zoning as per the Draft Plan.</p>
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Chapter/ Section	Individual Zoning Amendment	
Amendment ref.	Amendment 2.20	
Page no.	Map No's 4 and 8	
Policy/Objective No.	Map No's 4 and 8 - Greenogue	
Text/Policy/Objective Amendment Wording		
Amend Map No. 4 and No. 8 From Objective RU – ‘ <i>To protect and improve rural amenity and to provide for the development of agriculture</i> ’		
To: Objective EE – ‘<i>To provide for enterprise and employment related uses</i>’		
Note Specific Local Objective for these additional employment lands. See Amendment Ref. 9.4.		
Submission No.	Submission Summary	CE response and recommendation
SD-C226-65 Office of the Planning Regulator SD-C226-10 Office of Public Works SD-C226-43 Transport Infrastructure Ireland SD-C226-77 Con Mc Carthy SD-C226-19 Jones Lang LaSalle	<p>The following amendments refer to Amendment 2.20, for the rezoning of land from RU (Rural) to EE (Enterprise and Employment).</p> <p>A number of submissions welcomed the rezoning of the lands making the following points:</p> <ul style="list-style-type: none"> A number of submissions welcome the proposal to re-zone an area of approximately 130 acres adjoining Greenogue Business Park for Enterprise and Employment uses. One of which states that the availability of the zoned and serviced land at Greenogue is crucial to satisfying the current demand for industrial buildings in Southwest Dublin and that 	<p>CE Response:</p> <p>Note – This amendment is subject to CE Recommendations in response to the OPR submission.</p> <p>Amendment 2.20 relates to the rezoning of land located north and east of the Greenogue Business Park from RU to EE.</p> <p>A number of submissions welcomed Amendment 2.20, with other matters raised by these individual submissions, which do not relate directly to the referenced amendment, discussed in the Non Amendment Issues section.</p> <p>Employment Zones:</p>

<p>SD-C226-9 HARVEY</p> <p>SD-C226-11 Greenogue Management</p>	<p>there is a desire by businesses to locate along the N7, N4 and N81 business parks with good accessibility.</p> <ul style="list-style-type: none"> • One submission acknowledges that Amendment No. 9.4 (proposed insertion of a Strategic Local Objective (SLO) at the subject lands) will provide additional assurances to the Executive and the Elected Members that any future development of the subject lands will include flood risk alleviation measures to further augment the flood alleviation measures recently provided at the proximate Amazon development in accordance with SDCC Reg. Ref. SD19A/0370. • One Submission also suggests modifications in respect of the Strategic Flood Risk Assessment (SFRA) incorporated within the Proposed Material Alterations to the South Dublin Draft County Development Plan 2022-2028. – to propose. • One submission refers to rezoning lands adjacent to Greenogue and references the OPW submission. It discusses the SEA, AA and SFRA Assessment and the results of the Plan Making Justification Test. The submission discusses some flaws presented such as the CFRAM map not being up to date as it does not include flood attenuation recently constructed adjacent to the Camac River. The submission also states there is an incorrect flood modelling for Plan 	<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, an analysis is provided 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 OPR welcomed the evidence-based approach that has informed the strategy in the Draft Plan and considered the lands zoned for employment uses to be compliant with the RSES Guiding Principles for the Dublin Metropolitan Area and employment land and consistent with RPO 4.3 which states:</p> <p>‘Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin City and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.’</p>
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	<p>Making Justification Tests to the CFRAM map which the submission indicates that a justification test would not have been necessary. The submission also comments on the reasons for the failure of the justification test.</p> <p>The following submissions request that the proposed amendments are reverted as follows:</p> <ul style="list-style-type: none"> ➤ To amend Proposed Amendment 2.20 and amend zoning to the north and east of Greenogue Business Park from EE back to RU. <p>Each submission questions the amendment in the Material Alterations to the Draft Plan, making the following points:</p> <p>Employment Area:</p> <ul style="list-style-type: none"> • The OPR submits that there appears to be no evidential basis or strategic justification to support the rezoning of these lands for a significant quantum of additional EE uses. The submission notes that Greenogue Business Park is not identified as a strategic employment area in the RSES and the proposed rezoning is not consistent with RPO 5.6 (MASP Employment Lands) and is remote from a high quality public transport corridor. <p>Flood Risk:</p>	<p>Following Amendment 2.20, the OPR's submission to the Material Amendments states that there is no evidence base or strategic justification to support the rezoning of these lands for a significant quantum of additional EE uses, noting the Greenogue Business Park is not identified as a strategic employment area in the RSES and the zoning is not consistent with RPO 5.6. RPO 5.6 which states:</p> <p>'The development of future employment lands in the Dublin Metropolitan Area shall follow a sequential approach, with a focus on the re-intensification of employment lands within the M50 and at selected strategic development areas and provision of appropriate employment densities in tandem with the provision of high-quality public transport corridors.'</p> <p>The OPR has indicated that potential EE zoned land should follow a sequential approach, with a focus on the re-intensification of employment lands within the M50 and at selected strategic development areas. As the proposed site is not located within the M50 or at a selected strategic development location, the rezoning of this land for EE is premature. The site in question is also isolated from a high quality public transport corridor.</p> <p>Flood Risk</p> <p>One submission suggests that the Strategic Flood Risk Assessment to the County Development Plan should be modified to include a Plan Making Justification Test for the undeveloped lands at</p>
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	<ul style="list-style-type: none"> The OPW submission highlights that material alteration number 2.20 rezones lands from Rural & Agriculture to Enterprise & Employment that is classified as <i>less vulnerable</i> under the Guidelines on the Planning System and Flood Risk Management (DECLG/OPW, 2009). The submission points out that the combined SEA, AA, SFRA Assessment has stated that these lands do not pass the Plan Making Justification Test. The submission indicates that less vulnerable development is not appropriate in Flood Zones A or B unless the specific zoning has been assessed against and satisfied all criteria of the plan making Justification Test. The OPR submission notes that the Justification Test prepared as part of the updated SFRA acknowledges the flood risk in the general area of Greenogue/Baldonnel and recommends retaining the current RU zoning. <p>Impact on National Road and Rail</p> <ul style="list-style-type: none"> The OPR and TII submissions state with regards to the land use zoning objective alterations for low population density and traffic generation land use zoning objectives, in proximity to Junction 4 of the N7, the Local Authority should be mindful that any development proposals shall be subject to the requirements under Section 2.7 of the DoECLG 	<p>Greenogue, incorporated within the Proposed Material Alterations to the South Dublin Draft County Development Plan.</p> <p>The Office of Public Works (OPW) submission identifies that the use in question is classified as ‘less vulnerable’ under the Guidelines on the Planning System and Flood Risk Management (DECLG/OPW, 2009). Less vulnerable uses cannot be located within Flood Zones A or B, which these lands are, unless they satisfy the criteria for the Plan Making Justification Test set out in the Guidelines. The lands do not satisfy all of the relevant criteria. This was outlined in the CE Report on the Draft Plan submitted to the Elected Members on 7th December 2021 and was further discussed at the meetings which considered the Draft Plan in late February. The OPR also stated that the revised Justification Test which formed part of the Material Amendments acknowledges the flood risk in the general area of Greenogue/Baldonnel.</p> <p>One submission discusses the flaws of the CFRAM mapping not being up to date as it does not include flood attenuation recently constructed beside the Camac River. Regarding Flood Attenuation acting as a flood defence, Section 2.25 of the ‘The Planning System and Flood Risk Management’ states:</p> <p>‘The provision of flood protection measures in appropriate locations, such as in or adjacent to town centres, can significantly reduce flood risk. However, the presence of flood protection structures should be ignored in determining flood zones. This is because areas protected by flood defences still carry a residual risk of flooding from</p>
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	<p>Spatial Planning and National Roads Guidelines (2012), which requires that planning authorities must exercise particular care in their assessment of development/local area plan proposal relating to the development objectives and/or zoning of locations at or close to interchanges where such development could generate significant additional traffic with potential to impact on the national road. Potential of compromising the capacity and efficiency of the national road/associated junctions should be avoided.</p> <ul style="list-style-type: none"> The OPR submission states that the subject lands are located 2.5km from the village centres of Newcastle and Rathcoole and outside the Dublin City & suburbs boundary. The area is poorly serviced by public transport being located c.4.5km from the nearest LUAS stop in Saggart and with limited bus services. The submission goes on to say given the location and no high quality public transport corridor, it should be considered that the proposed rezoning is not consistent with RPO 5.3 (MASP Sustainable Transport) of the EMRA RSES. 	<p>overtopping or breach of defences and the fact that there may be no guarantee that the defences will be maintained in perpetuity...’.</p> <p>Though flood attenuation can mitigate against flooding, the guidance on this issue clearly states that all flood protections should be ignored in determining flood zones. As this is the case, the Amazon flood defences cannot be taken account in determining the flood zones and the CFRAM mapping is correct in the identification of Flood Zones A and B on the lands proposed for rezoning to EE.</p> <p>Impact on National Road/Rail and Public Transport Access:</p> <p>The current access to the site is located from the N7. The OPR and TII have advised that the subject lands are located in proximity to Junction 4 of the N7, where the council should be mindful that any development proposals shall be subject to the requirements under Section 2.7 of the DoECLG Spatial Planning and National Roads Guidance. It states:</p> <p><i>‘Planning authorities must exercise particular care in their assessment of development/local area plan proposals relating to the development objectives and/or zoning of locations at or close to interchanges where such development could generate significant additional traffic with potential to impact on the national road. They must make sure that such development which is consistent with planning policies can be catered for by the design assumptions underpinning such junctions and interchanges, thereby avoiding potentially compromising the capacity and efficiency of the national road/associated junctions and possibly leading to the premature and</i></p>
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		<p><i>unacceptable reduction in the level of service available to road users.'</i></p> <p>The proposed rezoning, of approximately 53 hectares (130 acres), is a significant addition to the existing zoning in this area adjacent to and reliant on Junction 4 of the N7. The scale of potential new development is likely to give rise to significant additional traffic movements both from workers getting to and from the site and from transport related enterprise, to and from this junction which is already subject to capacity constraints. Having regard to the submissions from TII and the OPR on junction capacity, the fact that no assessment has been carried out on the impact on local and national roads, and the lack of public transport, the rezoning is not considered to be in the interests of proper planning and sustainable development. This is particularly in light of policy within the RSES which indicates that development within the metropolitan area should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised. For all of the reasons outlined above, it is considered inappropriate to rezone the lands at Greenogue as proposed within Amendment 2.20.</p> <p>Conclusion</p> <p>Having regard to National Strategic Outcome 1 (Compact Growth), National Policy Objective 11 of the NPF, Regional Policy Objectives 5.3 and 5.6 of the RSES, Guidelines on the Planning System and Flood Risk Management (DECLG/OPW, 2009), Section 2.7 of the 'Spatial Planning and National Roads Guidelines for Planning</p>
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		<p>Authorities (2012) and the 'Development Plans, Guidelines for Planning Authorities: Draft for Consultation (2021)', it is considered inappropriate to rezone the lands as proposed by Amendment 2.20.</p> <p>CE Recommendation:</p> <p>Omit Amendment 2.20 from the lands at Greenogue Business Park and retain the RU zoning objective 'To protect and improve rural amenity and to provide for the development of agriculture' in the Draft Plan.</p> <p>Note: The response to the OPR and also Amendment 9.4 to insert a new SLO on the lands at Greenogue relates to this amendment.</p>
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Chapter/ Section	Individual Zoning Amendment	
Amendment ref.	Amendment 2.21	
Page no.	Map No. 6	
Policy/Objective No.	Map No. 6 - Spawell	
Text/Policy/Objective Amendment Wording		
Amend Map No. 6 From: Objective OS – Open Space – <i>'To preserve and provide for open space and recreational amenities'</i>		
To: Objective LC – Local Centre – <i>'To protect, improve and provide for the future development of Local Centres'</i>		
Note: Specific Local Objective for these additional Local Centre lands. See Amendment Ref. 9.11.		
Submission No.	Submission Summary	CE response and recommendation
SD-C226-43 Transport Infrastructure Ireland	With regards to the land use zoning objective alterations for low population density and traffic generation land use zoning	CE Response:

	<p>objectives, in proximity to Junction 11 of the M50, the Local Authority should be mindful that any development proposals shall be subject to the requirements under Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines (2012), which requires that planning authorities must exercise particular care in their assessment of development/local area plan proposal relating to the development objectives and/or zoning of locations at or close to interchanges where such development could generate significant additional traffic with potential to impact on the national road. Potential of compromising the capacity and efficiency of the national road/associated junctions should be avoided.</p>	<p>The submission from Transport Infrastructure Ireland (TII) with regards to any potential impact on National Roads and Junctions is noted.</p> <p>SM6 Objective 4 of the Draft Plan should be noted with relevance to the protection of National Road and associated junctions: SM6 Objective 4: <i>“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.”</i></p> <p>The proposed zoning is for Local Centre to facilitate development appropriate to serve a local catchment and which would not generally give rise to high intensity uses. It is noted that the detail of individual applications is considered on a case-by-case basis through the development management process. The impact on the national road and its junctions would be taken into consideration for any significant application on the subject site and TII would be a consultee on such applications.</p> <p>It is considered that there are sufficient policies and objectives of the Draft Plan which will facilitate the protection of the M50 and associated junctions in relation to any development that may come forward within the land use type associated with a local centre zoning.</p>
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		CE Recommendation: No change to Amendment 2.21.
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Non-Amendment Issues

The following issues refer to material or subject matter that was not included in either the 'Proposed Amendments' document or as the mapping of the proposed amendments that were placed on public display between 29th March and 26th April 2022. Consequently, and in accordance with Sections 12(7) to 12(10) of the Planning and Development Act 2000 (as amended) the following issues raised in submission(s) cannot be considered at this stage in the process and therefore do not result in any amendments to the Draft Plan.

Submission No.	Submission Summary	CE response and recommendation
SD-C226-9 HARVEY SD-C226-19 Jones Lang LaSalle SD-C226-8 Moffash ULC	<p>A number of submissions have stated there is an under-estimation of zoned land in the CDP for Enterprise and Employment (EE).</p> <p>One submission submitted an independent report carried out by CBRE in respect of the amount of lands zoned EE in the SDCC CDP, identifying a need for more industrial land in the County. The submission goes on to acknowledge the CE Recommendation for new objective Policy CS5, they are requesting the Council consider further amending the Plan, after a review of the enterprise and employment lands is analysed and quantified, to add additional EE zoned land to accommodate new developments during the lifespan of the CDP.</p>	<p>CE Response:</p> <p>As the observations were additional to the welcoming of the rezoning of lands at Greenogue, Amendment 2.20, and did not relate to a particular separate amendment, the issues raised cannot be considered at this stage of the process. However, in relation to the quantum of employment lands it is noted that the Amendment 2.9 provides for a new objective:</p> <p>CS5 Objective 5: To ensure, that as part of the two-year statutory review of the Development Plan, an evidence-based analysis of employment lands, including the potential for agri-hub employment, 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"> • Analysis of the type of employment need • Analysis of the appropriate location/s to

The submission goes on to state that earlier submissions regarding lands in their ownership, should be considered in the same light as the rezoning of Greenogue Business Park, as the sites have similar characteristics and will be extensions of existing business parks.

Another submission states that based on net absorption in the market, the proposed additional zoning of only approximately 130 acres of land in the Draft County Development Plan, while very welcome, will lead to the main corridors being grossly undersupplied with suitably zoned land going forward, which will inevitably drive end users to other Local Authority areas.

serve such need and the appropriate zoning objective • Relevant National and Regional policy and proper planning and sustainable development.

Chapter 3 – Natural, Cultural and Built Heritage

Chapter/ Section	Section 3.3.3 Designated Areas for Nature Protection and Conservation
Amendment ref.	Amendment 3.2
Page no.	85
Policy/Objective No.	Amend Section 3.3.3
Text/Policy/Objective Amendment Wording	
<p>Amend Section 3.3.3 as follows:</p> <p>Amend - NCBH3 Objective 2, from:</p> <p>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 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>To read:</p> <p>NCBH3 Objective 2:</p> <p>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 adverse effect (either alone or in combination), South Dublin County Council 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 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>And</p> <p>Insert the following new SLO</p>	

NCBH4 SLO1

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.

Submission No.	Submission Summary	CE response and recommendation
SD-C226-47 Tallaght Community Council	<p>The submission welcomes the additional protection of waterways in Tallaght afforded by the Specific Local Objective NCBH4 SLO1:</p> <p>NCBH4 SLO1</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>CE Response:</p> <p>Support for the additional protection for waterways in Tallaght, which is afforded by the SLO, NCBH4 SLO1, is noted.</p> <p>CE Recommendation</p> <p>No change to Amendment 3.2.</p>

Chapter/ Section	Section 3.3.3 Designated Areas for Nature Protection and Conservation
Amendment ref.	Amendment 3.4
Page no.	86
Policy/Objective No.	Amend Section 3.3.3 Under heading: 'Protection of Habitats and Species Outside of Designated Areas'
Text/Policy/Objective Amendment Wording	
<p>Amend Section 3.3.3 'Protection of Habitats and Species Outside of Designated Areas' (first paragraph) as follows:</p> <p>From:</p> <p>Protection of Habitats and Species Outside of Designated Areas</p> <p>The County supports a range of plant, animal and bird species and their habitats which are not formally protected under European or Irish legislation. Such areas have an important natural heritage or ecological value in the County which needs to be recognised and protected. These include nationally rare</p>	

plants, plants listed in the Red Data Lists of Irish Plants, the Flora Protection Order, 2015 (or other such Orders) and their habitats and animals and birds listed in the Wildlife Act 1976 (as amended) and any other subsequent statutory instrument

To read:

Protection of Habitats and Species Outside of Designated Areas

The County supports a range of **flora and fauna**, ~~animal and bird species~~ and their habitats which are not formally protected under European or Irish legislation. **It is notable however that all wild bird species occurring in Ireland are protected under the Wildlife Acts, 1976 to 2018.** Such areas have an important natural heritage or ecological value in the County which needs to be recognised and protected. These include nationally rare plants, plants listed in the Red Data Lists of Irish Plants, the Flora Protection Order, 2015 (or other such Orders) and their habitats and animals and birds listed in the Wildlife Act 1976 (as amended) and any other subsequent statutory instrument.

Submission No.	Submission Summary	CE response and recommendation
<p>SD-C226-50 Development Applications Unit</p>	<p>The submission recommendations on the original Draft of South Dublin County Development Plan 2022-2028 were made in relation to the content of certain sections of text. These included comments on the first paragraph of the part of Section 3.3 of Chapter 3: Natural, Cultural and Built Heritage, which deals with the Protection of Habitats and Species Outside of Designated Areas.</p> <p>The submission suggested that a sentence of this paragraph should be rewritten to reflect the full legal protection afforded wild birds. The submission notes that the alterations to the text of this paragraph now proposed refers to all wild bird species being protected under Wildlife Acts, 1972 to 2018, as requested, but mentions that the text of this paragraph as altered is overall confusing with regards to the protection, or lack of it, afforded to various species and habitats.</p> <p>The submission suggested the following to clarify this issue:</p> <p><i>The County supports a range of flora and fauna and their habitats which are not protected under European or Irish legislation. In other cases, whilst the species themselves are protected, such as in the case of all wild bird species and many</i></p>	<p>CE Response:</p> <p>The submission acknowledges that the amendment to the text sought by the DAU at Draft Plan stage has been included as requested. However, the text as changed in the Amendment makes the paragraph overall confusing with regards to the protection, or lack of it, afforded to various species and habitats. In this regard, the submission has suggested wording changes to make the wording less confusing. This is considered to be minor in nature, not changing the meaning of the paragraph and the revised wording should be included in the Plan.</p> <p>It is noted that the Wildlife Acts 1976-2018 is correct in the Draft Plan and not as raised in the submission which refers to 1972.</p> <p>CE Recommendation:</p> <p>Minor modification to Amendment 3.4:</p> <p>From:</p> <p>The County supports a range of flora and fauna, animal and bird species and their habitats which are not formally protected under European or Irish legislation. It is notable however that all wild bird species occurring in Ireland are protected under the Wildlife Acts, 1976 to 2018. Such areas have an important natural heritage or ecological value in the County which needs to</p>

	<p><i>mammal species under Wildlife Acts, 1972 to 2018, their habitats are not. The habitats of rare species in particular have an important natural heritage and ecological value for the County and should be protected. Such species include rare plants listed in the Red Data Lists of Irish Plants and especially those covered by the Flora Protection order, 20-15, (or other such orders). All bat species And the otter are subject to a system of strict protection under the European Habitats Directive (92/43/EEC), which includes protection of their resting and breeding places, and it would be desirable where possible to protect their foraging habitats as well.</i></p>	<p>be recognised and protected. These include nationally rare plants, plants listed in the Red Data Lists of Irish Plants, the Flora Protection Order, 2015 (or other such Orders) and their habitats and animals and birds listed in the Wildlife Act 1976 (as amended) and any other subsequent statutory instrument.</p> <p>To:</p> <p>The County supports a range of flora and fauna, animal and bird species and their habitats which are not formally protected under European or Irish legislation. It is notable however that all wild bird species occurring in Ireland are protected under the Wildlife Acts, 1976 to 2018. In other cases, whilst the species themselves are protected, such as in the case of all wild bird species and many mammal species under Wildlife Acts, 1976 to 2018, their habitats are not. The habitats of rare species in particular Such areas have an important natural heritage of and ecological value in for the County which needs to be recognised and should be protected. These Such species include nationally rare plants listed in the Red Data Lists of Irish Plants and especially those covered by the Flora Protection order, 2015, (or other such orders). and their habitats and animals and birds listed in the Wildlife Act 1976 (as amended) and any other subsequent statutory instrument. All bat species and the otter are subject to a system of strict protection under the European Habitats Directive (92/43/EEC), which includes protection of their resting and breeding places, and it would be desirable where possible to protect their foraging habitats as well.</p>
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Amendment ref.	Amendment 3.9
Page no.	101
Policy/Objective No.	Amend Section 3.3.7 Geology
Text/Policy/Objective Amendment Wording	

Amend Section 3.3.7 Geology NCBH12 Objective 1 as follows:

From:

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.

To read:

To protect identified County Geological Sites from inappropriate development, **avoiding potential conflicts with other ecological and cultural assets by engaging in consultation**, and to promote the importance and potential of such sites through the County's Heritage Plan.

Submission No.	Submission Summary	CE response and recommendation
SD-C226-32 Department of Communications, Climate Action and Environment	The submission from the Department of Communications, Climate Action and Environment included as an attachment comments from Geological Survey Ireland which included the welcoming of Amendment 3.9	<p>CE Response:</p> <p>The welcoming of the content of material in Amendment 3.9 '...avoiding potential conflicts with other ecological and cultural assets by engaging in consultation...', is noted.</p> <p>CE Recommendation:</p> <p>No change to Amendment 3.9</p>

Chapter/ Section	Section 3.4.5 Industrial Heritage	
Amendment ref.	Amendment 3.11	
Page no.	112	
Policy/Objective No.	Insert NCBH16 Objective 7	
Text/Policy/Objective Amendment Wording	<p>Insert new NCBH16 Objective 7 to read:</p> <p>To promote and support the development of a tourist amenity and educational/interpretative centre, such as a working demonstration mill, within the Dodder Valley"</p>	
Submission No.	Submission Summary	CE response and recommendation

<p>SD-C226-47 Tallaght Community Council</p>	<p>The submission welcomes this objective and recommends that additional wording be added at the end of the objective, as follows [additional wording in bold]:</p> <p>NCBH16 Objective 7 to read:</p> <p>To promote and support the development of a tourist amenity and educational/interpretative centre, such as a working demonstration mill, within the Dodder Valley, in/near locations where the mills once stood e.g., Old Bawn, Kiltipper. This would dove tail with the Dodder greenway trail.'</p>	<p>CE Response:</p> <p>The submission seeks to further amend [black bold] the new NCBH16 Objective 7</p> <p>NCBH16 Objective 7 to read:</p> <p>To promote and support the development of a tourist amenity and educational/interpretative centre, such as a working demonstration mill, within the Dodder Valley, in/near locations where the mills once stood e.g., Old Bawn, Kiltipper. This would dove tail with the Dodder greenway trail.'</p> <p>The proposed objective, the subject of the Material Amendment, is clear and offers scope for such a development based on a full investigation to be carried out to determine the best provision for such a use within the High Amenity area. The Objective offers an example of what that might entail '<i>such as a working demonstration mill</i>'. By further enhancing / reinforcing this one example by adding the words that would restrict the location of any centre or tourist amenity to in or near locations '<i>where mills once stood</i>' would curtail a full investigation being carried out on firstly, the use of the tourist amenity / centre and secondly of all appropriate locations within the Valley that can receive such a development.</p> <p>The proposed further amendment would significantly limit the scope of the investigation of a tourist amenity/centre within the Dodder Valley and would preempt any findings from baseline studies, research or a full investigation that would be the tool used to guide the most appropriate location and use of the amenity / centre within the Dodder Valley High Amenity Zone.</p> <p>CE Recommendation</p> <p>No change to Amendment 3.11.</p>
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Chapter/ Section	Section 3.5.2 Protected Structures
Amendment ref.	Amendment 3.13
Page no.	117
Policy/Objective No.	Amend Section 3.5.2 - NCBH19: Protected Structures

Text/Policy/Objective Amendment Wording

Amend Section 3.5.2 - NCBH19: Protected Structures to replace NCBH19 Objective 9 which refers to protected structures as follow.

From:

NCBH19 Objective 9 - To investigate the merit of including on the Record of Protected Structures the road sign Bothair An Racadair, Whitehall Road and the Granite Boundary Stone outside No. 50 Whitehall Road.

To:

NCBH19 Objective 10 – To investigate the merit of including the following on the Record of Protected Structures and where such merit is identified to undertake the necessary public consultation process under the Planning and Development Acts:

- **Palmyra House, Whitechurch Road, Rathfarnham, Dublin 16.**
- **Friarstown House and outbuildings, Bohernabreena, Co. Dublin D24 F890.**
- **SIAC Bridge, Monastery Road, Clondalkin, Dublin 22.**
- **Old Milestone on north-west side of Templeogue Road Set in front of the modern boundary wall of No. 211 Templeogue Road, Dublin 6W.**
- **Fort (or Callaghan’s) Bridge, Kiltipper/Friarstown Upper/Ballinascorney Lower, Dublin 24.**
- **Granite Boundary Stone outside Nos. 50/52, Whitehall Road, Dublin 12.**
- **Road sign Bothair An Racadair, Whitehall Road.**

Submission No.	Submission Summary	CE response and recommendation
SD-C226-26 South Dublin Conservation Society SD-C226-47 Tallaght	With regards to Protected Structures, one submission stipulates that all the structures listed under NCBH19 Objective 10, which states: To investigate the merit of including the following on the Record of Protected Structures and where such merit is identified to undertake the necessary public consultation process under the Planning and Development Acts: <ul style="list-style-type: none"> • Palmyra House, Whitechurch Road, Rathfarnham, Dublin 16. 	CE Response: Having regard to the request to automatically include all of the listed structures on the Record of Protected Structures, there are specific procedures for additions being made to the Record of Protected Structures under Part IV of the Planning and Development Act, 2000 (as amended) and in accordance with the Architectural Protection Guidelines for Planning Authorities that

<p>Community Council</p>	<ul style="list-style-type: none"> • Friarstown House and outbuildings, Bohernabreena, Co. Dublin D24 F890. • SIAC Bridge, Monastery Road, Clondalkin, Dublin 22. • Old Milestone on north-west side of Templeogue Road Set in front of the modern boundary wall of No. 211 Templeogue Road, Dublin 6W. • Fort (or Callaghan's) Bridge, Kiltipper/Friarstown Upper/Ballinascorney Lower, Dublin 24. • Granite Boundary Stone outside Nos. 50/52, Whitehall Road, Dublin 12. • Road sign Bothair An Racadair, Whitehall Road. <p>should be deemed as protected structures and automatically included on the Record of Protected Structures as opposed to suggesting a need to investigate the merit of such, considering their very existence and age.</p> <p>In relation to the addresses associated with the list of Protected Structures, one submission suggests the insertion of 'Tallaght' into the following bullet point [insertion in bold]:</p> <p>Fort (or Callaghan's) Bridge, Kiltipper/Friarstown Upper/Ballinascorney Lower, Tallaght, Dublin 24.</p>	<p>must be followed. A planning authority is obliged when compiling the RPS that all reasonable research has taken place and that all structures included merit protection, hence the need for an assessment and appraisal for each structure/building. There are 3 stages which a Planning Authority should adhere to regarding additions to the RPS, 1) Identification, 2) Assessment and 3) Notification. An assessment is part of the formal process; therefore structures / buildings cannot just be added without having gone through all of the 3-stage process as set out in the Architectural Protection Guidelines and in accordance with Part IV of the Planning and Development Act 2000 (as amended).</p> <p>NCBH19 Objective 10 ensures that all the listed structures will be fully investigated and if identified as having merit, will go through the entire 3-stage process to the necessary public consultation stage.</p> <p>The addition of the word 'Tallaght' into the address for Fort (or Callaghan's) Bridge is not considered necessary as its location is clearly identifiable through the townlands as set out in the Amendment.</p> <p>CE Recommendation:</p> <p>No change to Amendment 3.13</p>
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<p>Chapter/ Section</p> <p>Amendment ref.</p> <p>Page no.</p> <p>Policy/Objective No.</p>	<p>Section 3.5.3 Architectural Conservation Areas</p> <hr/> <p>Amendment 3.14</p> <hr/> <p>117</p> <hr/> <p>Add a new SLO to Section 3.5.2 - NCBH19: Protected Structures</p> <p>Add new SLO: NCBH19 SLO 7</p>
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Text/Policy/Objective Amendment Wording

Amend Section 3.5.2 - NCBH19: Protected Structures to add a new SLO:

NCBH19 SLO 7

To protect Glebe House, Rathcoole.

Submission No.	Submission Summary	CE response and recommendation
<p>SD-C226-3 Rathcoole Community Council</p>	<p>The submission refers to Amendment 3.14 in respect to NCBH19 SLO 7 and requests that it be modified to read as follows: "NCBH19 SLO 7 'To protect Glebe House RPS ref 313 (Former Mary Mercer Trust Charter School for Girls) National Inventory of Architectural Heritage reg no 11213013."</p> <p>It is submitted that Glebe House is of significant Architectural value having been built in 1744 and one of the few remaining examples of Charter School designs of the period in Ireland and is listed in the National Inventory of Architectural Heritage Reg No 11213013. The submission sets out that the building is also of a significant social and educational historical value being the only Girls Orphanage built and operated by The Mary Mercer Trust in South Dublin.</p>	<p>CE Response</p> <p>Amendment 3.14 proposed the insertion of a new SLO to protect Glebe House as follows:</p> <p>NCBH19 SLO 7</p> <p>To protect Glebe House, Rathcoole.</p> <p>The proposal to amend the description of Glebe House is generally acceptable and is considered minor in nature (as the description is only adding factual information with regard to the former use of the building and its existing protected structure status), subject to a slight modification to include the following wording only to describe the Protected Structure: '<i>Glebe House RPS ref 313 (Former Mary Mercer Trust Charter School for Girls)</i>'. There is no benefit in adding the NIAH number given that the RPS number is included.</p> <p>As a result of the above, the description in the Record of Protected Structures (Appendix 3A) should also be amended accordingly.</p> <p>CE Recommendation:</p> <p>Minor modification to Amendment 3.14 as follows:</p> <ol style="list-style-type: none"> 1. Amend NCBH19 SLO 7 wording to include the following text [black bold] as follows:

		<p>To protect Glebe House RPS Ref. 313 (Former Mary Mercer Trust Charter School for girls), Rathcoole.</p> <p>2. Amend the description column attached to Protected Structure Ref 313 contained within Appendix 3A Record of Protected Structures as follows [insertions in bold]: Glebe House (Former Mary Mercer Trust Charter School for girls).</p>
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Chapter/ Section	Section 3.5.3 Architectural Conservation Areas
Amendment ref.	Amendment 3.15
Page no.	117
Policy/Objective No.	Text Change – Section 3.5.3
Text/Policy/Objective Amendment Wording	
<p>Text change as follows:</p> <p>From:</p> <p>3.5.3 Architectural Conservation Areas</p> <p>An Architectural Conservation Area (ACA) is a place, area, group of structures or townscape that is of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest or value or that contributes to the appreciation of Protected Structures. An ACA may consist for example, of a row of terraced houses, a street, a village centre or a cluster of structures. Unless a structure is also listed on the Record of Protected Structures, the designation afforded from inclusion in an ACA only applies to the exterior and streetscape.</p> <p>The list below comprises ACAs identified within South Dublin County.</p> <ul style="list-style-type: none"> • Balrothery Cottages, Tallaght • Boden Village Cottages, Ballyboden 	

- Clondalkin Village
- Goose Park, Old Bawn Road
- Lucan Village
- Newcastle Village
- Palmerstown Lower – Mill Complex
- Rathcoole Village
- Rathfarnham Village including Willbrook
- Riverside Cottages, Templeogue
- Saint Patrick’s Cottages, Grange Road, Rathfarnham
- Tallaght Village
- TJ Burns Cottages, Old Bawn Road
- Whitechurch Road and Taylor’s Lane Cottages, Rathfarnham

Each ACA boundary is outlined on the Development Plan maps that accompany this written statement. A list of each ACA with a brief description of the architectural character of the area is set out below:

To read:

3.5.3 Architectural Conservation Areas

An Architectural Conservation Area (ACA) is a place, area, group of structures or townscape that is of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest or value or that contributes to the appreciation of Protected Structures. An ACA may consist for example, of a row of terraced houses, a street, a village centre or a cluster of structures. Unless a structure is also listed on the Record of Protected Structures, the designation afforded from inclusion in an ACA only applies to the exterior and streetscape.

The list below comprises ACAs identified within South Dublin County.

- Balrothery Cottages, Tallaght
- Boden Village Cottages, Ballyboden
- Clondalkin Village
- **St Maelruan’s Terrace** (Goose Park) Old Bawn Road
- Lucan Village
- Newcastle Village
- Palmerstown Lower – Mill Complex
- Rathcoole Village
- Rathfarnham Village including Willbrook
- Riverside Cottages, Templeogue
- Saint Patrick’s Cottages, Grange Road, Rathfarnham
- Tallaght Village

- ~~TJ Burns Cottages, Old Bawn Road~~
- Whitechurch Road and Taylor's Lane Cottages, Rathfarnham
- **No's 1-8 Red Cow Cottages and 1-8 Woodfarm Cottages, Old Lucan Rd, Palmerstown.**
- **St Brigid's Cottages, townland of Bushelloaf, Clondalkin**
- **9th Lock and Ballymanaggin Lane, townlands of Clonburris Great and Ballymanaggin, Clondalkin**
- **No's 168-186 Whitehall Road**

And as a consequence, omit:

NCBH20 Objective 10 from Section 3.5.3 and Appendix 3C:

~~NCBH20 Objective 10~~

~~To extend Clondalkin's Architectural Conservation Area (ACA) subject to an assessment of the roadways, buildings and historic features as set out in Appendix 3C.~~

Omit NCBH20 SLO 2 and SLO 3 from Section 3.5.3:

~~NCBH20 SLO 2: To investigate Saggart Village being designated an Architectural Conservation Area with specific emphasis on preserving the streetscape and scale of the village and its environs including the protection of the old mills.~~

~~NCBH20 SLO3~~

~~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.~~

Submission No.	Submission Summary	CE response and recommendation
SD-C226-47 Tallaght Community Council	With regards to the Architectural Conservation Areas within the Plan, the inclusion of 'Goose Park' is welcomed.	<p>CE Response:</p> <p>The support for the inclusion of 'Goose Park' in the ACAs is noted.</p> <p>CE Recommendation:</p> <p>No change to Amendment 3.15 in this regard.</p>
SD-C226-40 Cllr Trevor Gilligan PC SD-C226-25 Saggart Village Residents' Association	Two submissions note that NCBH20 SLO 2 to investigate Saggart being designated as an Architectural Conservation Area (ACA) has been removed. They question the reason as to why this was omitted and state that the list of areas in SDCC with ACA designation is extensive and that Saggart is not represented.	<p>CE Response:</p> <p>Following the inclusion of a number of objectives in the Draft Plan to assess various identified areas for their potential designation as ACAs, a consultant was commissioned to advance the assessments. The subsequent consultant's report and associated recommendations, received in January 2022 from John Cronin,</p>

		<p>informed the CE recommendations for material amendments to the Draft Plan.</p> <p>The proposed deletion of NCBH20 SLO 2 came in response to the investigation that was carried out by the independent expert on behalf of South Dublin County Council, on foot of the SLO in the Draft Plan, which concluded:</p> <p><i>“Having conducted background research and detailed survey work and having regard to national architectural heritage guidelines, we conclude that there is insufficient justification to recommend that South Dublin County Council (SDCC) should designate an ACA for the village of Saggart. This is based on (a) the significantly transformed village core, (b) the level of alternation to street-frontage buildings (and consequence loss of original fabric) and (c) that architecturally significant buildings and historical features of the village already have sufficient protection designation in and of themselves. Townscape improvements to the village could be advanced through other policy measures and do not require an ACA designation.”</i></p> <p>The findings from the independent research report indicate that an ACA at this location is not warranted and that other policy measures are in place to support the townscape improvement of the village.</p> <p>ACAs cannot be inserted into a Development Plan without having gone through an assessment procedure, the methodology for which is set out in the Architectural Heritage Protection Guidelines for Planning Authorities. This process was followed in coming to the assessment recommendation for Saggart.</p> <p>The Members agreed to take out the SLOs in the Draft Plan which related to investigation or assessment of ACAs following their assessment by the expert consultant which informed the material amendments.</p> <p>CE Recommendation:</p> <p>No change to Amendment 3.15 in this regard.</p>
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Chapter/ Section	Section 3.5.3
Amendment ref.	Amendment 3.17
Page no.	120
Policy/Objective No.	Section 3.5.3
Text/Policy/Objective Amendment Wording	

Omit

~~14. TJ Burns Cottages Semi-detached cottages on west side of Old Bawn Road. Requires assessment to derive further description.~~

Submission No.	Submission Summary	CE response and recommendation
SD-C226-47 Tallaght Community Council	With regards to Architectural Conservation Areas and the semi-detached cottages on the west side of Old Bawn Road, the submission rejects the omission of the TJ Burns Cottages and states that they, and other bungalows of a similar era and style, are worthy of protecting.	<p>CE Response:</p> <p>Following the inclusion of a number of objectives in the Draft Plan to assess various identified areas for their potential designation as ACAs, a consultant was commissioned to advance the assessments. The subsequent consultant's report and associated recommendations, received in January 2022 from John Cronin, informed the CE recommendations for material amendments to the Draft Plan.</p> <p>The proposed deletion of Item 14 under Section 3.5.3 Architectural Conservation Areas was taken in response to an investigation of the TJ Burns Cottages at Old Bawn Road that was carried out by an independent expert on behalf of South Dublin County Council, which concluded:</p> <p><i>"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."</i></p>

		<p>The findings from the independent research carried out, indicate that the buildings at this location do not warrant being defined as an ACA for two clear reasons as laid out above.</p> <p>It is also noted that reference to TJ Burns Cottages has been omitted in section 3.5.3 of the Draft Plan in the list of ACAs identified as set out under Amendment 3.15. No submission was received to amend its omission from that section and to include a description, as proposed here, without having it identified on the list of ACAs would be confusing.</p> <p>ACAs cannot be inserted into a Development Plan without having gone through an assessment procedure, the methodology for which is set out in the Architectural Heritage Protection Guidelines for Planning Authorities. This process was followed in coming to the assessment recommendation for TJ Burns cottages.</p> <p>CE Recommendation:</p> <p>No change to Amendment 3.17.</p>
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Chapter/ Section	Section 3.6.1 Adapting and Reusing Historic Buildings
Amendment ref.	Amendment 3.22
Page no.	125
Policy/Objective No.	Amend NCBH23 Objective 7
Text/Policy/Objective Amendment Wording	
<p>Amend NCBH23 Objective 7 from:</p> <p>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.</p> <p>To read:</p>	

To improve the streetscape of the historic villages with the removal of unnecessary poles, **overhead cables and other structures on footpaths, where feasible** to emphasise the visual impact of shopfronts and building features.

Submission No.	Submission Summary	CE response and recommendation
<p>SD-C226-47 Tallaght Community Council</p>	<p>With regards to Section 3.6.1 Adapting and Reusing Historic Buildings (NCBH23 Objective 7), the submission requests that additional text be inserted into Objective 7 as follows [additional text in bold]:</p> <p>To improve the streetscape of the historic villages with the removal of unnecessary poles, overhead cables and other structures on footpaths, e.g. overhead directional signs, where feasible to emphasise the visual impact of shopfronts and building features.</p>	<p>CE Response:</p> <p>The proposed further amendment to NCBH23 Objective 7 comprising the phrase 'e.g. overhead directional signs', is not considered beneficial. The thrust behind Objective 7 is very clear in that it seeks to improve the streetscape of the historic villages within the County and emphasise the visual impact of shopfronts and building features by removing unnecessary clutter. The Objective does not require additional text to achieve the sentiment behind the objective.</p> <p>Notwithstanding this, directional signs within historic villages are necessary and have a clear function. They can also add character to a streetscape if designed appropriately. By adding this phrase, well designed signage, which is appropriate to the historic character of the villages would be precluded.</p> <p>Having reviewed the proposed additional wording, it is not considered necessary to include the phrase as the existing wording of the Objective is comprehensive.</p> <p>CE Recommendation:</p> <p>No change to Amendment 3.22.</p>

Chapter/ Section	Section 3.6.3 Climate change Adaptation and Energy Efficiency in Historic Buildings
Amendment ref.	Amendment 3.24
Page no.	130
Policy/Objective No.	Amend Section NCBH26 Objective 2

Text/Policy/Objective Amendment Wording

Amend Section 3.6.3 Policy NCBH26 Objective 2 as follows:

From:
 NCBH26 Objective 2: To protect, preserve, maintain and promote industrial heritage features including weirs, mills and mill races along the River Dodder and River Liffey.

To read:
 NCBH26 Objective 2: To protect, preserve, maintain and promote industrial heritage features including weirs, mills and mill races along the River Dodder and River Liffey **and their tributaries.**

Submission No.	Submission Summary	CE response and recommendation
SD-C226-47 Tallaght Community Council	The submission welcomes the addition of the words 'and tributaries', as follows: CBH26 Objective 2: To protect, preserve, maintain and promote industrial heritage features including weirs, mills and mill races along the River Dodder and River Liffey and their tributaries.	<p>CE Response: The support for the inclusion of '<i>and their tributaries</i>' in relation to the River's Dodder and Liffey is noted.</p> <p>CE Recommendation: No change to Amendment 3.24.</p>

Chapter 4 – Green Infrastructure

Chapter/ Section	4.2.1 Biodiversity - GI 2 Objective 5	
Amendment ref.	Amendment 4.1	
Page no.	141	
Policy/Objective No.	Amend Section GI2 Objective 5	
Text/Policy/Objective Amendment Wording		
Amend Section GI2 Objective 5 as follows:		
From:		
GI2 Objective 5: 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.		
To read:		
GI2 Objective 5: 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, such proactive approach to include provision to inspect development sites post construction to ensure hedgerow coverage has been protected as per the plan.		
Submission No.	Submission Summary	CE response and recommendation
SD-C226-25 Saggart Village Residents' Association	The submission welcomes the Amendment to Objective GI2 Objective 5 to increase inspection of hedgerow protection post-build/	CE Response: The support for the addition to the Plan to increase inspection of hedgerow protection post-build is noted.
SD-C226-40 Cllr Trevor Gilligan PC		CE Recommendation: No change to Amendment 4.1.

Chapter/ Section	4.2.3 Climate Resilience - GI 5 Objective 4	
Amendment ref.	Amendment 4.4	
Page no.	148	
Policy/Objective No.	Amend Section GI5 Objective 4	
Text/Policy/Objective Amendment Wording		
Amend Section GI5 Objective 4 as follows:		
From:		
<p>GI5 Objective 4: 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 achieved urban greening targets based on the scoring mechanism developed through relevant interventions as part of the proposed development. (See Chapter 13 Implementation and Monitoring).</p>		
To read:		
<p>To implement the Green Space Factor (GSF) for all qualifying development comprising 2 or more residential units and any development with a floor area in excess of 500 sq.metres. Developers will be required to demonstrate how they can achieve a minimum Green Space Factor (GSF) scoring requirements based on best international standards and the unique features of the County's GI network. Compliance will be demonstrated through the submission of a Green Space Factor (GSF) Worksheet (see Chapter 13 Implementation and Monitoring, Section 13.3.2).</p>		
Submission No.	Submission Summary	CE response and recommendation
SD-C226-25 Saggart Village Residents' Association SD-C226-40 Cllr Trevor Gilligan PC	The submission welcomes the Amendment to GI5 Objective 4 of the Plan, which implements of minimum Green Space Factor requirements for developments.	<p>CE Response: The support is noted for the implementing of minimum Green Space Factor requirements for developments under GI5 Objective 4 of the Plan.</p> <p>CE Recommendation: No change to Amendment 4.4</p>

Chapter/ Section	Section 4.2.3 Climate Resilience	
Amendment ref.	Amendment 4.6	
Page no.	149	
Policy/Objective No.	Amend GI5 to add a new objective	
Text/Policy/Objective Amendment Wording		
Amend Section GI5 to add a new objective as follows:		
To complete a flood risk assessment for Saggart with a view to restoring and protecting existing biodiversity, ecosystems and drain systems.		
Submission No.	Submission Summary	CE response and recommendation
SD-C226-25 Saggart Village Residents' Association SD-C226-40 Cllr Trevor Gilligan PC	The submission welcomes the addition of a new objective to complete a flood risk assessment for Saggart with a view to restoring and protecting existing biodiversity, ecosystems and drain systems.	CE Response: Support is noted for the addition of a new objective under Section GI5 to complete a flood risk assessment for Saggart with a view to restoring and protecting existing biodiversity, ecosystems and drain systems. CE Recommendation: No change to Amendment 4.6.

Chapter/ Section	Section 4.2.5 Landscape, Natural, Cultural and Built Heritage	
Amendment ref.	Amendment 4.9	
Page no.	153	
Policy/Objective No.	Insert New SLO GI7 SLO2	

Text/Policy/Objective Amendment Wording

GI7 SLO2: To ensure the adequate protection and augmentation of the identified Alluvial Rathcoole 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.

Submission No.	Submission Summary	CE response and recommendation
SD-C226-26 South Dublin Conservation Society	A number of submissions welcome Amendment 4.9 GI7 SLO2 and the support to preserve and protect the Alluvial Woodlands at Rathcoole within the zoning RU.	CE Response: Amendment 4.9 should be considered having regard to the outcome of Amendment 2.13.
SD-C226-40 Cllr Trevor Gilligan PC	A number of submissions support the protection of the Woodlands in Rathcoole and welcomes the Council's own ecological assessment that found that 'overall the site is currently considered to be of County ecological importance for its mosaic of Annex I (priority) habitats, species-rich semi-natural habitats, heritage value hedgerows, wetland habitats and mosaic of wooded and non-wooded semi-natural habitats which are rare in County Dublin'.	The support for Amendment 4.9 which inserts a new SLO GI7 SLO2 is noted.
SD-C226-25 Saggart Village Residents' Association		A number of submissions ask that the Development Plan ensures that no development in the wider area can be allowed to impact on the integrity of the Annex 1 habitats including the Alluvial Woodlands within the Rathcoole Woodlands site and the lowland hay meadow within Rathcoole Park. Some submissions raise concerns about potential development eastward, seeking an expansion of the woodland eastwards instead. These issues referring to lands in the wider area and to the east, do not directly link to Amendment 4.9 which specifically relates to lands identified Alluvial Rathcoole Woodlands within the zoning RU . Notwithstanding this, multiple policies and objectives, specifically within Chapters 3 and 4 as well as elsewhere within the Plan, have been included to seek to strengthen green linkages throughout the County. These Policies and Objectives require strong Green Infrastructure connections not solely within identified areas but throughout all development areas within the wider area. Each of these development areas will have to be assessed as part of any planning application against the wider policy in the Development Plan including the provision of GI linkages and environmental protections.
SD-C226-76 Katie Goodwin	A number of submissions ask that the Development Plan ensures that no development in the wider area can be allowed to impact on the integrity of the Annex 1 habitats including the Alluvial Woodlands within the Rathcoole Woodlands site and the lowland hay meadow within Rathcoole Park.	
SD-C226-38 Deputy Emer Higgins		
SD-C226-57 Niall Healy		
SD-C226-73 Orla Daly	Two submissions highlight Specific Local Objective (SLO) GI7 SLO2 and indicate that clarity of this protection is required and state that it needs to be statutorily protected i.e., proposed pNHA, Nature Reserve or SAC. Reference is made to the Hodd Report, 2021 where it is indicated that 'This site should be designated as a proposed Natural	
SD-C226-72 Eugene McElhinney	'This site should be designated as a proposed Natural	A number of submissions have sought clarity on the type of protections afforded to the Alluvial Rathcoole Woodlands, the

<p>SD-C226-75 Alice Magee</p> <p>SD-C226-30 Four Districts Woodland Habitat Group</p>	<p><i>Heritage Area (pNHA), which would recognise its locally important role on an official level. It could also be designated as a National Nature Reserve.</i> These submissions consider that protection of this area can only happen if augmentation of the alluvial Woodland can be achieved by allowing the continued expansion eastward and allowing the existing trees within that area to mature. It is contended that the proposed RES-N zoning will deter this from happening. These submissions point out various references to Rathcoole Woodlands and consider that the council distinguishes between the alluvial woodland in the proposed rural zoning and woodland not protected outside of it. In this regard, it is requested that the council take account of all woodland in the entire area regardless of Annex status. It is put forward that if rewilding continues there could be up to 23ha of alluvial woodland. These submissions indicate that a map is required in the Draft Plan which clearly indicates the exact location of the alluvial woodland.</p>	<p>subject of SLO GI7 SLO2 and seek protections associated with 'statutorily' protection (designated a pNHA, Nature Reserve, SAC). It is considered that the rezoning of the alluvial woodland lands to RU amending the Draft Plan zoning of RES-N, the inclusion of an SLO on the RU lands to protect the woodlands, the proposed recognition of the Alluvial Woodlands with an associated objective in the GI Strategy, together with the supporting policies and objectives within the Plan, recognise the significant ecological value of this area, and comprehensively provides for the protection and enhancement of the same whilst still facilitating an area of RES-N zoning for much needed social and affordable housing, primary school and community and sporting facilities. Furthermore, the woodlands will be protected by the inclusion of the SLO within the Plan, which is in itself a statutory document, alongside other existing policy and objectives within the Plan, this will provide significant protections for the woodlands.</p> <p>The matter of designation as a Natura 2000 site, or proposed NHA or a Wildlife Reserve was put forward at the Special Development Plan meeting on the Draft Plan in February on foot of motion 14 (ID 73889). The outcome of the debate was to agree the material amendment as set out under this Amendment 4.9 and to include Rathcoole Alluvial Woodlands within the RU zoning within Strategic Corridor 5: Camac River Corridor with a specific objective related to its protection (Amendment 4.10).</p> <p>A map of the Alluvial Woodland is set out as part of the CE Report, Appendix 2B, to the Draft Plan issued to the Members on 7th December 2021 and which was available for the public to view.</p> <p>CE Recommendation:</p> <p>No change to Amendment 4.9.</p> <p>Note: It is considered that the proposed further amendments are not minor in nature and are outside the scope of this stage of the plan making process.</p>
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Chapter/ Section	Section 4.3.2 Strategic Corridor Objectives – Corridor 5: Camac River
Amendment ref.	Amendment 4.10
Page no.	168
Policy/Objective No.	Addition to Section 4.3.2 – Strategic Corridor 5: Camac River Corridor

Text/Policy/Objective Amendment Wording

Addition to Section 4.3.2 – Strategic Corridor 5: Camac River Corridor – Table 4.1

Insert under Stepping Stones in the first column:

Rathcoole Alluvial Woodlands within RU zoning.

Add the following objective to the second column:

- To preserve and protect the Alluvial Woodlands at Rathcoole within the zoning RU as an environmentally sensitive area for biodiversity and ecosystems services of importance having full regard to their Annex 1 status.**

Submission No.	Submission Summary	CE response and recommendation
SD-C226-30 Four Districts Woodland Habitat Group	A number of submissions welcome the recognition of the Alluvial Woodland, its incorporation into the Green Infrastructure (GI) network and the inclusion of Rathcoole Alluvial Woodlands as a new stepping stone within Strategic Corridor L7.	<p>CE Response:</p> <p>Amendment 4.10 should be considered having regard to the outcome of Amendment 2.13.</p> <p>The support for Amendment 4.10 is noted and welcomed.</p> <p>The consideration of the Rathcoole Woodlands as a Core Area took place at the Draft Plan stage and formed part of the Chief Executive's Report on Draft Plan Public Consultation 7th December 2021 which was considered by the Elected Representatives. Material Amendment 4.10 was the result of the Elected Members consideration of the issue.</p>
SD-C226-26 South Dublin Conservation Society	A number of the submissions request that Rathcoole Woodlands be reconsidered as a Core Area rather than a Stepping Stone and contend that Rathcoole Woodlands is of a suitable size to be considered a core area in the GI Network. A few submissions quote sizes from the unpublished Hodd Report, 2021. It is highlighted that Habitat 91E0 is a national resource and that there is no other record of this habitat in the County of Dublin. The submissions also refer to Corkagh Park, which is identified as a Core Area and	
SD-C226-40 Cllr Trevor Gilligan PC		

<p>SD-C226-25 Saggart Village Residents' Association</p> <p>SD-C226-15 Ne Graver</p>	<p>considers there is a lack of connectivity in terms of land and water with other stepping stones when compared to Rathcoole Woodlands and one submission states that Corkagh Park has no direct continuous land or water connectivity with any of the stepping stones identified in Corridor 5: Camac River Corridor given that both the land and water is intercepted for example by the M7 with no biodiversity land bridges and all water culverted. Submissions highlight that the Council's own ecological assessment found that overall the site of Rathcoole Woodlands is currently considered to be of County ecological importance.</p> <p>One submission raised concerns that having regard to L7 – Citywest-Saggart Link which states <i>"a difficult spatial situation as several green spaces (stepping stones) have been separated from each other by residential and industrial development. These spaces include Rathcoole Park, Citywest Golf Club and smaller pockets of green space at Citywest Business Campus and the Brookfield residential area"</i>, that the spatial situation would be exacerbated by the separation of Rathcoole Woodlands from Rathcoole Park as a result of implementation of the new CS10 SLO1. A few submissions also highlight the proposed CS10 SLO1 and considers it will result in the reduction in existing woodland area; disconnection of Rathcoole Woodlands from Rathcoole Park by grey infrastructure (roads and buildings along the eastern perimeter); and habitat fragmentation. The submissions consider that additional grey infrastructure which is required for the RES-N lands will reduce the connectivity in this area and will diminish the woodlands habitat and amenity value and any prospect of being a Core Area. The splitting of the rewilded area into two components, East and West of the proposed Res – N zoning is not welcomed.</p>	<p>The submissions appear to suggest that the designation of Rathcoole Woodlands as a Core Area may prevent disconnection in the Strategic Corridor 5 as well as help to expand the area further. 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. Designation as a Core Area would not add additional protections to the woodlands. 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. As it stands, Corkagh Park is identified as a Core Area with Rathcoole Woodlands and Rathcoole Park identified as two of a number of stepping stones alongside Lugg Forest, Slievethoul/Slade Valley and open spaces within Citywest and Kilcarbery. The recategorisation to a core area would not have any impact on the issues raised in terms of connectivity. Issues of connectivity within the Strategic Corridor would have to be considered as part of any future planning application having regard to the policy and objectives in Chapter 4 Green Infrastructure and the overall Green Infrastructure Strategy.</p> <p>The several matters arising from the submissions which relate to the zoning of the lands and associated objectives introduced under Amendment 2.13 are not matters which can be dealt with as part of this amendment.</p> <p>CE Recommendation:</p> <p>No change to Amendment 4.10.</p>
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	A submission states that in the light of reduced connectivity and area as a result of the new proposed CS10 SLO1 and the associated rezoning, it is reasonable to propose Rathcoole Woodlands as a Stepping Stone but submits it is not the desired outcome.	
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Chapter/ Section	Section 4.3.2 Strategic Corridor Objectives – Corridor 5: Camac River	
Amendment ref.	Amendment 4.11	
Page no.	168	
Policy/Objective No.	Amend Section	
Text/Policy/Objective Amendment Wording		
Amend the second Objective (bullet point) in the second column under ‘Objectives associated with the Core Areas / Stepping Stones’ as follows:		
From:		
To support the development of a masterplan for the zoned lands at Rathcoole and implement the recommendations.		
To read:		
Investigate the potential opportunities to link woodlands at Rathcoole to existing and proposed recreational trails at Lugg Woods and Slade Valley.		
Insert new objective in the second column under ‘Objectives associated with the Core Areas / Stepping Stones’ as follows:		
<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>		
Submission No.	Submission Summary	CE response and recommendation
SD-C226-40 Cllr Trevor Gilligan PC	Submission welcomes Amendment 4.11 relating to potential of linking the Rathcoole Woodlands to existing and proposed recreational trails.	CE Response:

SD-C226-25 Saggart Village Residents' Association		<p>Support is noted for Amendment 4.11 relating to the potential of linking the Rathcoole Woodlands to existing and proposed recreational trails.</p> <p>CE Recommendation:</p> <p>No change to Amendment 4.11</p>
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Chapter/ Section	Appendix 4- Green Infrastructure: Local Objectives and Case Studies	
Amendment ref.	Amendment 4.12	
Page no.	No page number	
Policy/Objective No.	L7 – Citywest-Saggart Link	
Text/Policy/Objective Amendment Wording		
<p>From:</p> <p>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>To:</p> <p>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>Insert new Objective:</p> <p>To provide connections between Rathcoole Woodlands and Rathcoole Park as part of a wider walking trail in the area.</p>		
Submission No.	Submission Summary	CE response and recommendation

SD-C226-1 Proinsias Mac Fhlannchadha	A number of submissions welcomes amendment 4.12 and the insertion of a new objection.	CE Response:
SD-C226-30 Four Districts Woodland Habitat Group	A submission notes that a wider interpretation of connections would also be welcomed to include consideration of wildlife within the overall Green Infrastructure corridor.	The submissions welcoming Amendment 4.12 are noted.
SD-C226-40 Cllr Trevor Gilligan PC	A submission considers that the specific local objective, CS10 SLO1, and the associated zoning will curtail and displace wildlife at this location and the adjacent surrounding area. It is pointed out that there is evidence of badgers in this area however no study was conducted to ascertain what their status and habits are within the area associated with CS10 SLO1.	The Amendment comprised an amendment to L7 – <i>Citywest-Saggart Link as laid out in Appendix 4 – Green Infrastructure: Local Objectives and Case Studies</i> by inserting Rathcoole Woodlands into the link and by inserting a new objective to provide connections between Rathcoole Woodlands and Rathcoole Park as part of a wider walking trail in the area. Some of the submissions raise issues that do not relate directly to the Amendment such as additional studies being required and the removal of a boundary.
SD-C226-25 Saggart Village Residents' Association	A submission also considers that the area of CS10 SLO1 is also unclear with the proposed removal of its boundary.	The new objective, the subject of this amendment, is clear in that it is an objective to provide connections between the two areas via a wider walking trail in the area. With regards to concerns raised relating to wildlife consideration within this walking trail, it is important to note that the policies and objectives within the Plan are committed to the implementation of Green Infrastructure and Green Space Factor. In particular, Objective GI6 Objective 5, as laid out in Chapter 4 of the Written Statement, will be applicable when the wider walking trail is considered in the future:
	A submission suggests that the linkage proposed at Citywest Golf Club could be deleted due to its vague nature and that Citywest Golf club is no longer in existence.	“To support the provision of new walkways and cycleways in suitable locations... in a manner that does not compromise the ecological functions of the corridors ”.
		Any future walking trail proposals will be required to support ecological functions of the corridor. Additional wording is therefore not required within Appendix 4. No further changes are necessary.
		One submission suggests the deletion of Citywest Golf Club from the list. The material amendment outlined in Amendment 4.12 relates to the inclusion of ‘Rathcoole Woodlands’ to Corridor L7 and not to Citywest Golf Club lands and therefore the proposed change cannot be considered at this stage in the Plan process.
		Notwithstanding this, Corridor L7 draws a connection between green spaces at the edge of Citywest to South Dublin’s urban-rural fringe at Saggart and Rathcoole. The Citywest lands are indicated

		<p>as a stepping stone and policies/objectives included within the Plan will attempt to link this and other spaces in a coherent fashion through engagement with stakeholders in order to support the implementation of GI features and new biodiversity-friendly planting throughout the L7 Corridor.</p> <p>CE Recommendation:</p> <p>No change to Amendment 4.12.</p>
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Chapter 5 - Quality Design and Healthy Placemaking

Chapter/ Section	Section 5.2.5 Public Realm	
Amendment ref.	Amendment 5.5	
Page no.	185	
Policy/Objective No.	Amend QDP6 Objective 7	
Text/Policy/Objective Amendment Wording		
<p>Amend QDP6 Objective 7 as follows:</p> <p>From:</p> <p>QDP6 Objective 7: 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.</p> <p>To read:</p> <p>QDP6 Objective 7: To ensure, in so far as is practical, that all boundary walls in new residential developments are of a similar height and of a high quality 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 in order to leverage the opportunity to improve the quality of boundary treatments.</p>		
Submission No.	Submission Summary	CE response and recommendation
SD-C226-48 Tallaght Community Council	The submission welcomes Amendment 5.5 in respect to QDP6 Objective 7 to leverage all opportunities to improve boundaries.	<p>The contents of the submission welcoming the amendment are noted.</p> <p>CE Recommendation No change to Amendment 5.5.</p>

Chapter/ Section	Section 5.4.1 Local Area Plans	
Amendment ref.	Amendment 5.10	
Page no.	205	
Policy/Objective No.	Insert New QDP14 Objective 5	
Text/Policy/Objective Amendment Wording		
<p>Insert New QDP14 Objective X as follows:</p> <p>To read:</p> <p>QDP14 Objective 5</p> <p>To prepare a Local Area Plan for Saggart.</p>		
Submission No.	Submission Summary	CE response and recommendation
SD-C226-25 Saggart Village Residents' Association	The submissions welcomes QDP14 Objective 5: To prepare a Local Area Plan for Saggart.	The contents of the submission welcoming the amendment are noted.
SD-C226-40 Cllr Trevor Gilligan PC		<p>CE Recommendation</p> <p>No change to Amendment 5.10.</p>

Chapter/ Section	Section 5.4.1 Local Area Plans
Amendment ref.	Amendment 5.11
Page no.	205
Policy/Objective No.	Insert New QDP14 Objective 6
Text/Policy/Objective Amendment Wording	

Insert New QDP14 Objective X as follows:

To read:

QDP14 Objective 6

To require a Local Transport Plan to be carried out as part of any LAP preparation process, commensurate to the scale of the LAP. The Local Transport Plan/Local Area Plan will be subject to screening for AA and SEA

Submission No.	Submission Summary	CE response and recommendation
SD-C226-25 Saggart Village Residents' Association	The submissions acknowledge and welcome the requirement for a Local Transport Plan to be carried out as part of any LAP preparation process, commensurate to the scale of the LAP.	The support of the NTA with regards to the proposed Objective QDP14 Objective 6 is noted. Amendment 5.11 proposed for the new objective to read:
SD-C226-40 Cllr Trevor Gilligan PC	One submission recommends that a statement be included that sets out that Local Transport Plans have regard to the NTA and TII Guidance Note on Area Based Transport Assessments 2018 or any subsequent updates.	QDP14 Objective 6: <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. The Local Transport Plan/Local Area Plan will be subject to screening for AA and SEA.</i>
SD-C226-6 National Transport Authority	A further submission welcomes the commitment to the preparation of Local Transport Plans (LTP) as part of intended Local Area Plans (LAP). The transport authority	The submission requests that the objective be further amended to include the following:

<p>SD-C226-43 Transport Infrastructure Ireland</p>	<p>states that it will support consultation during the preparation of the LTP and LAPs, where there may be implications for the national road network in the area and Luas.</p>	<p><i>'regard should be had to the NTA and TII Guidance Note on Area Based transportation Assessments 2018 or any subsequent updates thereof.'</i></p> <p>Having regard to section 6.3.1 Transport of the Draft Development Plan Guidelines for Planning Authorities, where this type of assessment is recommended and to which the Planning Authority is to have regard, it is considered that the request is reasonable and therefore a minor amendment should be applied to Objective QDP14 Objective 6 to read as follows:</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. The Local Transport Plan/Local Area Plan should have regard to the NTA and TII Guidance Note on Area Based Transportation Assessments 2018 or any subsequent updates thereof, and will be subject to screening for AA and SEA.'</i></p> <p>CE Recommendation Minor modification to Amendment 5.11 such that Objective QDP14 Objective 6 would read as follows:</p> <p>From:</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. The Local Transport Plan/Local Area Plan will be subject to screening for AA and SEA.</i></p> <p>To:</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. The Local Transport Plan / Local Area Plan should have regard to the NTA and TII Guidance Note on Area Based transportation Assessments 2018 or any</i></p>
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		<i>subsequent updates thereof, and will be subject to screening for AA and SEA.</i>
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Chapter/ Section	5.4.3 Framework/Masterplans	
Amendment ref.	Amendment 5.13	
Page no.	207	
Policy/Objective No.	Insert New objective under QDP16 Objective 4	
Text/Policy/Objective Amendment Wording		
<p>Insert New QDP16 Objective 4 as follows:</p> <p>To read:</p> <p>QDP16 Objective 4:</p> <p>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.</p>		
Submission No.	Submission Summary	CE response and recommendation
SD-C226-43 Transport Infrastructure Ireland	The submission endorses the amendment to QDP 16 Objective 4 and states that it will welcome and facilitate consultation in establishing whether a discreet Local Transport Plan for framework / masterplans is required where there is potential national road network and / or Luas implications.	<p>The contents of the submission endorsing the amendment are noted.</p> <p>CE Recommendation No change to Amendment 5.13.</p>

Chapter 6 – Housing

Chapter/ Section	Section 6.1 Housing Strategy and Interim Housing Needs Demand Assessment
Amendment ref.	Amendment 6.3
Page no.	216
Policy/Objective No.	Amend H1 Objective 13
Text/Policy/Objective Amendment Wording	
<p>Amend H1 Objective 13 as follows:</p> <p>From:</p> <p>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"> • 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. <p>To read:</p> <p>H1 Objective 13: Proposals for residential development shall provide a minimum of 30% 3-bedroom units, unless it can be demonstrated that a lesser provision may be acceptable where it can be demonstrated that:</p> <ul style="list-style-type: none"> • 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 socioeconomic, population and housing data set out in the Housing Strategy and Interim HNDA; **or**
- **the scheme is a social and/or affordable housing scheme**

Note: Build-To-Rent (BTR) residential developments shall comply with the Sustainable Urban Housing: Design Standards for New Apartments (2020) (or any superseding Section 28 Ministerial Guidelines).

Submission No.	Submission Summary	CE response and recommendation
<p>SD-C226-25 Saggart Village Residents' Association</p> <p>SD-C226-40 Cllr Trevor Gilligan PC</p> <p>SD-C226-62 Tallaght Community Council</p>	<p>The submissions raise concerns regarding Amendment 6.3, with particular regard to social and / or affordable housing schemes. It is submitted that there is a need for social / affordable housing for families who require 3 bedroom houses and that removing this minimum requirement will disincentivise developers from considering 3 bedroom houses.</p> <p>A further submission refers to Amendment 6.3 in respect to H1 Objective 13 and submits that this amendment seriously dilutes the intent and benefit to deliver a truly diverse mix of unit sizes in higher density settings. It is submitted that developers have shown they will continue to drive towards a high percentage of 1 beds and studios unless there is a strong objective in the governing plan. Furthermore, it is submitted that the notion that this standard would not apply to the council itself seriously undermines the spirit and the principle of this objective.</p>	<p>With regard to Amendment 6.3 as proposed, the Council's social and / or affordable housing schemes are specifically targeted at the identified need for a particular area. The mix of units provided within social and / or affordable housing schemes is targeted at meeting the needs of those on the housing waiting list. Social and affordable housing is generally provided by the Local Authorities and through Approved Housing Bodies (AHB). AHBs work closely with the Local Authority to address the need requirements for the area based on the housing lists data. Therefore, it is considered that Amendment 6.3 does not dilute or undermine the spirit of the objective but recognises the fundamental intention of H1 Objective 13 which is to cater for mixed communities by ensuring a mix of housing types particularly within areas designated for significant growth during the lifetime of the Plan, while also recognising the role of the Local Authority in providing a choice of housing in the County. The application of a minimum 30% 3-bedroom units' requirement in such instances would seriously compromise the ability of the relevant providers to meet the needs of those on the social housing list.</p> <p>The inclusion of H1 Objective 13 in the Draft Plan stems from the following Specific Planning Policy Requirement</p>

		<p>(SPPR) set out in the Ministerial <i>Design Standards for New Apartments' Guidelines</i> (2020) issued under Section 28 which states:</p> <p><i>Specific Planning Policy Requirement 1</i> <i>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).</i> [emphasis added]</p> <p>The 30% 3-bedroom minimum requirement is based on the findings of the Housing Strategy and Interim HNDA for South Dublin as set out in Appendix 11 of the Draft Plan. The Draft Plan, under H1 Objective 13, specifies a housing mix requirement which is evidence based through the application of a minimum provision standard whilst also recognising that in certain instances – such as where there are unique site constraints that would prevent such provision; where 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 socioeconomic, population and housing data set out in the Housing Strategy and Interim HNDA, or; where the scheme is a social and / or affordable housing scheme – a lesser provision may be acceptable. This is considered reasonable and appropriate in order to balance the first part of SPPR 1 which would allow for residential development consisting of up to 50% one-bedroom or studio type units (with no</p>
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		<p>more than 20-25% of the total proposed development as studios) with no minimum requirement for three or more bedrooms.</p> <p>The proposed Amendment to the objective does not dilute the intent and benefit of the objective in the Draft Plan to deliver a diverse mix of unit sizes in higher density settings as has been suggested in the submission. The amended objective clarifies that there is a standard minimum requirement for 3 bed units unless one of the exceptions to this standard can be demonstrated. The addition of the note to the objective clarifies that the objective cannot override the Specific Standard Policy Requirement (SPPR) set out in the Apartment Guidelines in relation to Build to Rent. In this way, the amendment addresses issues raised by a number of submissions to the Draft Plan, including concerns expressed by the OPR.</p> <p>The Amendment was debated by the Elected Members as part of the meetings on the Draft Plan and it was agreed to go out on public display. It is noted that the OPR in their submission to the Material Amendments did not comment further on this objective.</p> <p>Having regard to the above, to the need to provide a clear evidence base as to why any exception to the 30% 3 bed requirement is appropriate, while also having regard to government policy, it is considered that the Amendment is in the best interests of accommodating the different types of housing need within the County while ensuring adherence to broader government policy.</p> <p>CE Recommendation No change to Amendment 6.3</p>
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Chapter/ Section	Section 6.7.1 Residential Design and Layout	
Amendment ref.	Amendment 6.5	
Page no.	226	
Policy/Objective No.	Amend to H7 Objective 3	
Text/Policy/Objective Amendment Wording		
Amend H7 Objective 3 as follows:		
From:		
H7 Objective 3: 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, and only progressing vehicle permeability schemes where necessary.		
To read:		
H7 Objective 3: 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, and only progressing vehicle permeability schemes where necessary- , having regard to the National Transport Authority's Permeability Best Practice Guide (2015) or any subsequent guidelines, including the provisions relating to permeability schemes and anti-social behaviour.		
Submission No.	Submission Summary	CE response and recommendation
SD-C226-62 Tallaght Community Council SD-C226-6 National Transport Authority	One of the submissions refers to Amendment 6.5 in respect to H7 Objective 3 and raises concerns regarding the dilution of controlling vehicular access where there are known hot spots for anti-social behaviour. The submission from the NTA welcomes (Amendment 6.5) H7 Objective 3 to remove the reference to vehicular permeability schemes and the inclusion of a commitment to have regard to the National Transport Authority's	CE Response The contents of the submission are noted. It is noted that the NTA welcomes Amendment 6.5. Amendment 6.5 proposes to amend H7 Objective 3 as follows: H7 Objective 3: 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, and only

	<p>Permeability Best Practice Guide (2015) or any subsequent guidelines.</p>	<p>progressing vehicle permeability schemes where necessary, having regard to the National Transport Authority's Permeability Best Practice Guide (2015) or any subsequent guidelines, including the provisions relating to permeability schemes and anti-social behaviour.</p> <p>It should be noted that a previous motion was put forward under Motion ID: 71322 at the June 2021 CDP Meetings requesting to amend Chapter 6, Policy H7 Objective 3 as follows:</p> <p><i>From: To promote a permeable, connected County and discourage gated residential development as they exclude, and divide established communities.</i></p> <p><i>To: To promote a permeable, connected County and discourage gated residential development and the termination of cul-de-sacs in developments as they exclude, and divide established communities.</i></p> <p>The CE recommended that it be adopted. An amendment to the Motion was proposed and agreed as follows:</p> <p><i>H7 Objective 3</i> <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, and only progressing vehicle permeability schemes where necessary.</i></p> <p>It should be further noted that the National Transport Authority in their submission to the Draft Plan through the public consultation period under submission SD-C195-245 recommended that the references to anti-social behaviour and vehicle permeability schemes are removed from H7 Objective 3. The CE Response was set out as follows:</p>
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		<p><i>'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 incorporated in order to mitigate against the potential for such antisocial behaviour. 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 was noted.'</i></p> <p>The CE Recommendation in relation to SD-C195-245 as per the CE Report was to amend H7 Objective 3 to read: <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. and only progressing vehicle permeability schemes where necessary.'</i></p> <p>A further motion was put forward under Motion 12 (Motion ID: 73977) at the March 2022 CDP Meetings requesting to amend Chapter 6 Policy H7 Objective 3 as follows:</p> <p>From: <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.</i></p> <p>To: <i>To support the principle of permeability schemes that provide improved connections between housing estates and their surrounds for walking and cycling whilst taking into</i></p>
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		<p><i>account the need to ensure that anti-social behaviour is not increased or facilitated by such schemes.</i></p> <p>In response to Motion 12, the CE Recommendation referred to the Permeability Best Practice Guide (2015) published by the National Transport Authority which discusses issues relating to permeability schemes and anti-social behaviour and includes relevant case studies and best practice guidance. The CE Recommendation was to amend H7 Objective 3 to reads as follows as per Amendment 6.5: '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, and only progressing vehicle permeability schemes where necessary, having regard to the National Transport Authority's Permeability Best Practice Guide (2015) or any subsequent guidelines, including the provisions relating to permeability schemes and anti-social behaviour.'</p> <p>This was agreed by the Elected Members at the March 2022 CDP Meetings and proceeded to go out for Public Consultation as part of the Proposed Material Amendments.</p> <p>Having regard to the concerns raised in the submission, it is considered that Amendment 6.5 in relation to H7 Objective 3 as proposed is appropriate and consistent with the National Transport Authority guidance and does not dilute the controlling of vehicular access where there are known hot spots for anti-social behaviour.</p> <p>CE Recommendation No change to Amendment 6.5.</p>
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Chapter/ Section	Section 6.7.4 Internal Residential Accommodation
Amendment ref.	Amendment 6.6
Page no.	228
Policy/Objective No.	Amend H10 Objective 3
Text/Policy/Objective Amendment Wording	

Amend H10 Objective 3 as follows:

From:

H10 Objective 3: To consider the need for housing units to provide enough space to allow for individuals to work from home.

To read:

H10 Objective 3: ~~To consider the need for housing units to provide enough space to allow for individuals to work from home.~~ **To strongly encourage the provision of adequate space to allow for individuals to work from home in housing units, including apartments.**

Submission No.	Submission Summary	CE response and recommendation
SD-C226-67 TCC SD-C226-62 Tallaght Community Council	One of the submissions requests that the Council make it a requirement that at least 80% of new apartments have an additional room for remote working. A further submission refers to Amendment 6.6 in respect to H10 Objective 3 and submits that we need a strong direction to ensure sufficient floor space, and design to allow for the large percentage of hybrid working that is now prevalent and will be the norm going forward. It is submitted that this should be	CE Response The contents of the submission are noted. Amendment 6.6 proposes to amend H10 Objective 3 to read as follows: H10 Objective 3: To consider the need for housing units to provide enough space to allow for individuals to work from home. To strongly encourage the provision of adequate space to allow for individuals to work from home in housing units, including apartments.

	<p>mandated and not discretionary to ensure the flexibility and quality of life of all homes, especially rental apartments.</p>	<p>The Draft Plan refers to the Government’s Making Remote Work National Remote Work Strategy under EDE4 Objective 12 as follows: <i>EDE4 Objective 12:</i> <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>As per the foreword in the National Remote Work 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.</p> <p>The National Remote Working Strategy refers to the Health and Safety Authority’s (HSA) – the body responsible for health and safety in the workplace in Ireland – published Guidance on Working from Home (October 2020). This guidance includes information on creating a suitable home office environment.</p> <p>The Planning Department can encourage and support an increase in the size of units or innovative design to provide for home working but must have regard to Government guidelines which set out standard room sizes for different unit types, through section 28 Guidelines including the Apartment Guidelines. It is evident that developers are responding to market trends in terms of home-working and the design of residential units. However, this does not necessarily mean a further room in a house / apartment, as innovative design can provide for an area for home working without the additional cost for house purchasers of a further dedicated room. As evidenced through consultation at the pre-draft stage of the development</p>
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		<p>plan process, some developers are also bringing forward shed type garden buildings as part of development which are capable of being used for a home office.</p> <p>The following policies and objectives of the Plan support the provision of flexible and adaptable housing:</p> <p><i>QDP7 Objective 9: To promote and support the provision of quality housing with long-term adaptability in residential and mixed-use developments, having regard to the principles and guidance in relation to adaptability as set out in the South Dublin County's Height and Density Guide (Appendix 10) and the Urban Design Manual – A Best Practice Guide (2009) and the guidance on Lifetime Homes as set out in the Quality Housing and Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities (2007).</i></p> <p><i>Policy H10: Internal Residential Accommodation</i> <i>Ensure that all new housing provides a high standard of accommodation that is flexible and adaptable, to meet the long-term needs of a variety of household types and sizes.</i></p> <p>Therefore, it is considered that Amendment 6.6 as proposed in respect to H10 Objective 3, in conjunction with other policies and objectives of the Plan which support the provision of flexible and adaptable housing, is appropriate and consistent with government guidelines in relation to Remote Working.</p> <p>CE Recommendation No change to Amendment 6.6.</p>
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Chapter 7 – Sustainable Movement

Chapter/ Section		Section 7.3 Overarching Policies and Objectives
Amendment ref.		Amendment 7.2
Page no.		246
Policy/Objective No.		Insert New Objective SM1 Objective 9
Text/Policy/Objective Amendment Wording		
<p>Insert a new objective under SM1: Overarching – Transport and Movement to read:</p> <p>SM1 Objective 9</p> <p><i>'To support micro-mobility in line with legislative/statutory requirements.'</i></p>		
Submission No.	Submission Summary	CE response and recommendation
SD-C226-55 American Chamber of Commerce Ireland	The submission supports the inclusion of this amendment and micro-mobility solutions as part of the integration of various transport systems as they would be beneficial for many.	<p>CE Response:</p> <p>The submission is noted and welcomed. Micro-mobility provisions are supported under the new objective SM1 Objective 9 <i>'To support micro-mobility in line with legislative/statutory requirements.'</i></p> <p>CE Recommendation:</p> <p>No change to Amendment 7.2.</p>

Chapter/ Section	Section 7.4 Travel Mode Share
Amendment ref.	Amendment 7.3
Page no.	248
Policy/Objective No.	Table 7.0

Text/Policy/Objective Amendment Wording

Amend the heading for Table 7.0

From:

Existing and Target Mode Share (percentage)

To:

Existing and Target* Mode Share (percentage)

* Note this relates to targets within the lifetime of the Development Plan. As transport investment provides for further improvements in bus, rail and cycling schemes, the mode share outcomes for cycling and public transport will also rise.

Submission No.	Submission Summary	CE response and recommendation
SD-C226-6 National Transport Authority SD-C226-55 American Chamber of Commerce Ireland	The NTA has reviewed the proposed Material Amendments to the Draft South Dublin County Development Plan 2022-2028 having regard to the Transport Strategy for the Greater Dublin Area 2016-2035 and the recently issued Draft Transport Strategy for the Greater Dublin Area 2022-2042. The submission acknowledges the inclusion of the recommendations made following comments on the 15th September 2021 and is supportive of the proposed Material Amendment 7.3.	CE Response: The support for Material Amendments 7.3 is noted and welcomed. It is the aim of the Plan to further develop the '10-minute neighbourhood' concept, enhance and promote active travel modes in addition to supporting improvements to public transport infrastructure with the overall aim reducing emissions and contributing towards South Dublin's attractiveness as a place to live and work. CE Recommendation:

	A further submission welcomes the amendments and its focus on sustainable movement, which contributes to carbon neutrality and retains Dublin as an attractive location to live and work.	No change to Amendment 7.3.
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Chapter/ Section	Section 7.5.4 Active Travel and Schools
Amendment ref.	Amendment 7.6
Page no.	255
Policy/Objective No.	SM2 Objective 4
Text/Policy/Objective Amendment Wording	
<p>Amend SM2 Objective 4:</p> <p>From:</p> <p>SM2 Objective 4: 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.</p> <p>To:</p> <p>SM2 Objective 4: '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 through filtered permeability, while also taking account of existing patterns of anti-social behaviour and other</p>	

~~unintended consequences of removal of such barriers.~~ in the removal of such barriers with due consideration of consultation with local residents where need is evident or expressed’.

Submission No.	Submission Summary	CE response and recommendation
SD-C226-6 National Transport Authority	<p>The NTA has reviewed the proposed Material Amendments to the Draft South Dublin County Development Plan 2022-2028 having regard to the Transport Strategy for the Greater Dublin Area 2016-2035 and the recently issued Draft Transport Strategy for the Greater Dublin Area 2022-2042.</p> <p>The submission acknowledges the inclusion of the recommendations made following comments on the 15th September 2021 and is supportive of the proposed Material Amendment 7.6.</p>	<p>CE Response: The support for Material Amendment 7.6 is noted and welcomed.</p> <p>CE Recommendation: No change to Amendment 7.6.</p>

Chapter/ Section	Section 7.5.4 Active Travel and Schools
Amendment ref.	Amendment 7.9
Page no.	257
Policy/Objective No.	Add New Objective SM2 Objective 17
Text/Policy/Objective Amendment Wording	
<p>To insert a new objective under Policy SM2 Walking and Cycling:</p> <p>SM2 Objective 17:</p> <p>‘To support bike parking provision at villages, centres, parks and any other area of interest, as well as near public transport nodes to support multi-modal transport options.’</p>	

Submission No.	Submission Summary	CE response and recommendation
SD-C226-55 American Chamber of Commerce Ireland	The submission welcomes amendments 7.9 and its focus on sustainable movement, which contributes to carbon neutrality and retains Dublin as an attractive location to live and work.	<p>CE Response:</p> <p>The support is noted and welcomed. The insertion of a new objective under Policy SM2 Walking and Cycling:SM2 Objective 17: 'To support bike parking provision at villages, centres, parks and any other area of interest, as well as near public transport nodes to support multi-modal transport options' will further encourage and strengthen active mode use within South Dublin County Council.</p> <p>CE Recommendation:</p> <p>No change to Amendment 7.9.</p>

Chapter/ Section	Section 7.5.4 Active Travel and Schools	
Amendment ref.	Amendment 7.10	
Page no.	257	
Policy/Objective No.	Insert New SLO SM2 SLO 4	
Text/Policy/Objective Amendment Wording		
<p>Insert a new SLO under Policy SM2 Walking and Cycling to read as follows:</p> <p>SM2 SLO4:</p> <p>'To improve the safety of the road for pedestrians between Millbrook Nursing Home and Saggart Village.'</p>		
Submission No.	Submission Summary	CE response and recommendation
SD-C226-25 Saggart Village Residents' Association	The submissions welcome and support the amendment to the Plan to improve the safety of the road for pedestrians between Millbrook Nursing Home and Saggart Village.	<p>CE Response:</p> <p>The support to the proposed Objective SM2 SLO4:</p>

SD-C226-40 Cllr Trevor Gilligan PC		<p>'To improve the safety of the road for pedestrians between Millbrook Nursing Home and Saggart Village' is noted.</p> <p>CE Recommendation: No change to Amendment 7.10.</p>
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Chapter/ Section	Section 7.6 Public Transport	
Amendment ref.	Amendment 7.12	
Page no.	259	
Policy/Objective No.	SM3 Objective 6	
Text/Policy/Objective Amendment Wording		
<p>Amend SM3 Objective 6 from:</p> <p>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>To Read:</p> <p>To establish future public transport routes that will support the County's medium to long term development, including new and/or enhanced orbital routes to provide connectivity between outer suburban areas.</p>		
Submission No.	Submission Summary	CE response and recommendation
SD-C226-83 Future Of Dublin	<p>The submission regarding Amendment 7.12 suggests that SM3 Objective 6 be augmented to read:</p> <p>To establish future public transport routes that will support the County's medium to long term development, including new and/or enhanced orbital routes such as an S5</p>	<p>CE Response:</p> <p>While the intention of the submission is noted, it is considered that SM3 Objective 6 should remain as a broad objective in order to capture all 'orbital routes' and therefore, it is not considered appropriate to detail specific routes such as the R112 as proposed. The wording as set out under Amendment 7.12 is considered to be</p>

	orbital along the R112 to provide connectivity between outer suburban areas.	appropriate and provides for sufficient flexibility for the enhancement of future public transport routes within the County. CE Recommendation: No change to Amendment 7.12.
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Chapter/ Section	Section 7.6 Public Transport	
Amendment ref.	Amendment 7.13	
Page no.	259	
Policy/Objective No.	SM3 Objective 7	
Text/Policy/Objective Amendment Wording		
<p>Amend SM3 Objective 7 from:</p> <p>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>To:</p> <p>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 and the feasibility of linking the red and green Luas to maximise public transport links and permeability in Dublin Southwest'.</p>		
Submission No.	Submission Summary	CE response and recommendation
SD-C226-1 Proinsias Mac Fhlannchadha	A submission notes that under the Draft GDA Transport Strategy (2022-2042) there is no reference to a proposal to link the Green and Red Lines during the lifetime of this	CE Response: A submission suggests that the additional text proposed under amendment 7.13 be removed and replaced as follows:

<p>SD-C226-51 Tallaght Community Council SD-C226-84 Department of Transport</p>	<p>transport plan, nor is there specification that such a route is viable. The submission suggests that the additional text proposed under amendment 7.13 be removed and replaced as follows:</p> <p>From: 'and the feasibility of linking the red and green Luas to maximise public transport links and permeability in Dublin Southwest'.</p> <p>To: "and to revisit the <u>Metro to Knocklyon</u> feasibility study which was prepared in July 2021 to take into account the increases in population anticipated as part of this Development Plan and for stakeholder participation to be included as part of this process."</p> <p>The submission adds that the NTA did not include a public participation in this which is an oversight.</p> <p>A Further submission approves the amendment to SM3 Objective 7 if it delivers a fully linked up network to existing public transport to the Luas terminus and the planned transport hub at The Square.</p> <p>The Department of Transport has noted that there is no funding available under the National Development Plan 2021-2030 to link the green and red Luas.</p>	<p>From: 'and the feasibility of linking the red and green Luas to maximise public transport links and permeability in Dublin Southwest'.</p> <p>To: "and to revisit the <u>Metro to Knocklyon</u> feasibility study which was prepared in July 2021 to take into account the increases in population anticipated as part of this Development Plan and for stakeholder participation to be included as part of this process."</p> <p>The proposed Amendment to SM3 Objective 7 provides a strong focus on the public transport requirements for Dublin South West. The wording relating to a Metro feasibility is already indicated through the inclusion of the wording 'including examining the feasibility of Metro and/or Luas, serving areas including Ballyboden, Ballycullen/Oldcourt, Firhouse, Kimmage, Knocklyon, Rathfarnham, South Tallaght, Templeogue and Terenure' in the Objective. In addition, is it considered that the proposed Amendment 7.13 wording for SM3 Objective 7 already addresses the concerns raised in the submission.</p> <p>The National Transport Authority have carried out public consultation as part of the review of the GDA Transport Strategy to 2042, which ended on 22nd January 2022 and South Dublin County Council made a submission at that stage of their public consultation.</p>
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		<p>South Dublin County Council and the NTA are independent in their public consultation procedures. However, it is understood that the NTA will continue to engage with the public when presenting further detailed options that would arise from feasibility studies.</p> <p>Having regard to the above it is considered that the proposed wording for SM3 Objective 7, as set out under Material Amendment 7.13, captures the required focus of the submission for the enhancement of public transport provision for the Dublin South West area, in line with the NTA Transport Strategy and does not require further changes.</p> <p>Furthermore, the Draft Transport Strategy specifies that the south city terminus at Charlemont offers the optimal location for interchange with the Green Line in response to growing demand in the longer term and is an appropriate location to facilitate any potential future metro extensions to serve the south west, south or south east of the city region should sufficient demand arise.</p> <p>The submission which is supportive of SM3 Objective 7 is noted and welcomed. In this regard South Dublin County Council will continue to liaise and engage with the NTA in order to deliver enhancements to public transport infrastructure throughout the County including Dublin South West.</p> <p>While the Department of Transport have stated that under the National Development Plan 2021-2030, there is no funding available to link the Green and Red Luas lines, the objective is to examine the feasibility of linking the two only at this stage.</p>
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		CE Recommendation: No change to Amendment 7.13.
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Chapter/ Section	Section 7.6.1 BusConnects	
Amendment ref.	Amendment 7.17	
Page no.	265	
Policy/Objective No.	SM3 Objective 26	
Text/Policy/Objective Amendment Wording		
<p>Insert a new objective under SM3 Public Transport – Rail, Transport Interchange and Park and Ride</p> <p>SM3 Objective 26:</p> <p>‘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 Ireland’s ‘Code of Engineering Practice’ as may be amended.’</p>		
Submission No.	Submission Summary	CE response and recommendation
SD-C226-43 Transport Infrastructure Ireland	The submission endorses the proposed amendment objective but reiterates the existence of the TII Light Rail Environment – Technical Guidelines for Development PE-PDV-00001, December 2020 document, and has recommended that an amendment to Objective SM3 Objective 26 be made to include a reference to this document. Proposed amended wording as follows: ‘To ensure planning applications adjacent to the Luas, which have the potential to impact on light rail infrastructure	CE Response: The support to Amendment 7.17 is noted and welcomed. The Amendment proposes a new objective under SM3 Public Transport – Rail, Transport Interchange and Park and Ride, SM3 Objective 26: ‘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 Ireland’s ‘Code of Engineering Practice’ as may be amended.’

	<p>have regard to TII's Light Rail Environment – Technical Guidelines for Development and developments arising are carried out in accordance with Transport Infrastructure Ireland's 'Code of Engineering Practice' as may be amended.'</p> <p>The submission notes that the proposed amendment as published annotates that SM3 Objective 26 occurs at Section 7.6.1 BusConnects of the Draft Plan but should occur under Section 7.6.2 Rail.</p>	<p>The submission requires that the objective be further modified by including a reference to 'TII's Light Rail Environment – Technical Guidelines for Development and developments arising' to read: To ensure planning applications adjacent to the Luas, which have the potential to impact on light rail infrastructure have regard to TII's Light Rail Environment – Technical Guidelines for Development and developments arising are carried out in accordance with Transport Infrastructure Ireland's 'Code of Engineering Practice' as may be amended.'</p> <p>The addition of the reference to the TII's Light Rail Environment – Technical Guidelines for Development is both minor and acceptable and therefore, the suggested changes to the amendment should carry through.</p> <p>The reference to the correct heading for this objective is noted. In this regard the proposed objective will sit under section 7.6 Public Transport, Policy SM3 Public Transport – Rail, Transport Interchange and Park and Ride.</p> <p>CE Recommendation: Minor modification to Amendment 7.17 to read as follows: To ensure planning applications adjacent to the Luas, which have the potential to impact on light rail infrastructure have regard to TII's Light Rail Environment – Technical Guidelines for Development and that developments arising are carried out in accordance with</p>
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		Transport Infrastructure Ireland's 'Code of Engineering Practice' as may be amended.'
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Chapter/ Section	Section 7.7.2 New Street and Road Proposals
Amendment ref.	Amendment 7.21
Page no.	270
Policy/Objective No.	Table 7.5
Text/Policy/Objective Amendment Wording	
<p>Amend description and function in Table 7.5 Six Year Road programme relating to the Western Dublin Orbital Route 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 Read:</p> <p>Description: New road from the N7 to the N4 Leixlip Interchange with an extension to the N81.</p> <p>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 primarily to provide resilience to the M50, recognising that this may also provide additional resilience to peripheral roads within the county, in particular between the N7 and N4. 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 alluvial woodlands at Rathcoole, 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>	

Submission No.	Submission Summary	CE response and recommendation
SD-C226-6 National Transport Authority SD-C226-24 Lucan Golf Club SD-C226-25 Saggart Village Residents' Association SD-C226-38 Deputy Emer Higgins SD-C226-40 Cllr Trevor Gilligan PC SD-C226-43 Transport Infrastructure Ireland SD-C226-50 Development Applications Unit	<p>A number of submissions support the proposed Western Dublin Orbital Route in the six-year roads programme and in particular the bypassing of Saggart and Rathcoole. The submissions also support the commitment to carry out a traffic and transport study for Rathcoole, Saggart and Newcastle following the publication of the GDA Strategy Review.</p> <p>It is further outlined that this route should be used to link the N81 to the N4, via the N7, as was originally envisaged and that if it does not happen, it will not serve the purpose of traffic management for Rathcoole and Saggart villages.</p> <p>In addition, The Development Applications Unit of the Department of Housing, Local Government and Heritage wish to draw attention to its previous comments regarding the Western Dublin Orbital Route in Table 7.5. The submissions state that a detailed ecological impact assessment should be carried out for the above and that appropriate measures be identified to mitigate the potential effect on fauna and flora.</p> <p>The Development Applications Unit has suggested that in the case of lands owned by the Council adjacent to the Grand Canal and west of the proposed route along the western boundary of the Grange Castle West Business Park, they be dedicated to nature conservation to</p>	<p>CE Response:</p> <p>The content of the submissions in favour of the wording for proposed material amendment 7.21 are noted alongside the commitment to carry out a traffic and transport study for Rathcoole, Saggart and Newcastle following the publication of the NTA's GDA Transport Strategy Review.</p> <p>While the content of these submissions is noted the submission from the NTA clearly sets out that the now published NTA Draft Strategy for the Greater Dublin Area does not provide for the further extension of this route from the N7 to the N81 with Measure ROAD9 setting out the following:</p> <p>Measure ROAD9 – Regional and Local Roads Policy - Enhance orbital movement between the N3, the N4 and N7 national roads, by the widening of existing roads and/or the development of new road links, for the purpose of providing resilience to the operation of the M50 and incorporating provision for sustainable transport.</p> <p>The NTA submission further details the requirements under Section 9(6A) of the Planning and Development Act 2000 (as amended) which requires that all Development Plans in the Greater Dublin Area be consistent with the GDA Transport Strategy and indicate that the reference to the potential extension between the N7 and the N81 be omitted.</p>

	<p>compensate for the impacts of the roads on biodiversity, noting that this rural fringe along the Kildare border is identified as a significant component of the County's Green Infrastructure identified in the Draft Plan.</p> <p>In this regard, it is requested that the Grand Canal pNHA be mentioned in the last sentence of the amendment, as an identified environmentally sensitive area.</p> <p>A further submission notes any plan to establish a connection between the N7 and N4 Leixlip interchange along the R403, should take into consideration the amenity of the Lucan golf course and its recreational benefit.</p> <p>The submissions from the NTA and TII note the wording set out in table 7.5 in regard to the Orbital routes primary function to provide resilience to the M50.</p> <p>In this regard the NTA state that the Draft GDA Transport Strategy does not provide for the further extension of this route from the N7 to the N81 and it is recommended that the wording for this route be amended to omit the reference to the extension of the route between the N7 and the N81.</p> <p>The submission references section 9(6A) of the Planning and Development Act 2000 (as amended) which requires that all Development Plans in the Greater Dublin Area shall be consistent with the GDA Transport Strategy. It is recommended that to ensure consistency with the GDA</p>	<p>In this regard it should be noted that only minor modifications to Material Amendments can be made at this stage of the plan making process, that is, the Plan is made with or without the proposed amendment or with a minor modification to the Amendment.</p> <p>Taking this into consideration and while the reasoning set out for the omission of the reference to the orbital route extending to the N81 is noted, this modification cannot be carried out as both the Draft and Material Amendment wording have been on public display with clear references to the western orbital route and the extension to the N81.</p> <p>In order to address this issue, it is considered that the requirement of the NTA can be largely met by inserting the wording 'a potential' in the 'Description' of the Western Dublin Orbital Route which would match the wording of the Function currently set out under Material Amendment 7.21.</p> <p>It should be further noted that the OPR submission on the proposed Material Amendments has requested a minor modification to the function of the proposed western orbital route to state that the proposed route would include provision for sustainable transport modes along its length. This is considered appropriate and was included as part of the CE Recommendation to the OPRs submission on this matter.</p> <p>Further minor amendments are also recommended to the objective to ensure it reads logically and to reflect that the NTA Strategy will be in place when the Plan comes into effect and will no longer be under review as worded in the Draft Plan.</p>
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	<p>Transport Strategy that the reference to the potential extension between the N7 and N81 is omitted.</p> <p>TII further highlight the fact that all Greater Dublin Area Development Plans are required to be consistent with the GDA Transport Strategy and in order to ensure consistency with national road commitments and the Strategy it is recommended that the reference to the potential extension between the N7 and 81 is omitted as there is no N81 extension road scheme proposal.</p>	<p>Regarding the request for the ecological characteristics and protection of the Grand Canal to be listed as part of the wording in the function of the route it is considered that the existing wording which sets out that ‘In any such route a primary objective of South Dublin County Council shall be to protect environmentally sensitive areas’ provides sufficient protection to the Grand Canal which is a proposed Natural Heritage Area.</p> <p>Proposed NHA’s already benefit from environmental protection which is further outlined in the Plan under NCBH4 Objective 1: NCBH4 Objective 1: 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.</p> <p>In addition to the above and with particular reference to concerns around the preservation of the amenity of Lucan Golf Club, it should be noted that the location, design and alignment of any route between the N7 and N4 has yet to be finalised and will be subject to detailed consideration of need and route options by the NTA. Route options will be required to take account of environmental considerations under the EIA Directive.</p> <p>CE Recommendation: Minor modification to Amendment 7.21 as follows:</p>
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		<p>From:</p> <p>Description: New Road from the N7 to the N4 Leixlip Interchange with an extension to the N81.</p> <p>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 primarily to provide resilience to the M50, recognising that this may also provide additional resilience to peripheral roads within the county, in particular between the N7 and N4. 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 alluvial woodlands at Rathcoole, 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 Leixlip Interchange with a potential extension to the N81.</p> <p>Function: New Road to link between the N7 and the N4 Leixlip Interchange to include provision for sustainable transport</p>
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		<p>modes along its length, the function of this route would be primarily to provide resilience to the M50. There is further potential for a further the extension of this route from the N7 to the N81 with a route by-pass function around Rathcoole and Saggart, recognising that this may also provide additional resilience to peripheral roads within the county in particular between the N7 and N4. 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. Development of these routes will be aligned with the NTAs GDA Transport Strategy. Delivery will be 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 alluvial woodlands at Rathcoole, 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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Chapter/ Section	Section 7.9.1 Integrated Transport Studies
Amendment ref.	Amendment 7.23
Page no.	276
Policy/Objective No.	Insert New Objective SM6 Objective 12
Text/Policy/Objective Amendment Wording	

Insert a new objective under Policy SM1 Overarching – Transport and Movement:

SM6 Objective 12

'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. The Local Transport Plan/Local Area Plan will be subject to screening for AA and SEA'.

Submission No.	Submission Summary	CE response and recommendation
SD-C226-43 Transport Infrastructure Ireland	The submission welcomes and endorses the proposed additional objective QDP14 Objective 6.	<p>CE Response</p> The support for the insertion SM6 Objective 12 is noted and welcomed. <p>CE Recommendation</p> No change to Amendment 7.23.

Non-Amendment Issues

The following issues refer to material or subject matter that was not included in either the 'Proposed Amendments' document or as the mapping of the proposed amendments that were placed on public display between 29th March and 26th April 2022. Consequently, and in accordance with Sections 12(7) to 12(10) of the Planning and Development Act 2000 (as amended) the following issues raised in submission(s) cannot be considered at this stage in the process and therefore do not result in any amendments to the Draft Plan.

Submission No.	Submission Summary	CE response and recommendation
SD-C226-2 Gary Mackin	Dublin Airport have no comment on the proposed Material Alterations to the Draft Development Plan 2022-2028 but recommend consultation with the IAA and the IAA-ANSP.	<p>CE Response:</p> The content of this observation has been responded to under Chapter 11, Infrastructure and Environmental Services.
SD-C226-6 National Transport Authority	While the Authority is supportive of the above amendments there are a number of suggested amendments which, they indicated, have not been included in the plan. In this regard the following recommendations are put forward:	<p>CE Response:</p> The NTA submission in relation to policy CS5 and objective EDE4 Objective 4 are noted. However, policy CS5 and EDE4 Objective 4 are not subject to a material amendment of the Draft Plan and

	<p>No amendments to policies CS5 and EDE 4 Objective 4 have been included in the Plan. The submission reiterates the view that this policy and the supporting objective do not provide sufficient clarity and direction on the locations where high intensity employment uses would be appropriate. It is recommended 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. The submission puts forward the argument that such developments would be considered more appropriate on brownfield sites within the Tallaght and Clondalkin Town Centre areas; the Naas Road regeneration lands (City Edge project lands); Liffey Valley and Clonburris; or existing built-up areas served by high-capacity public transport. The submission also recommends that Policy EDE 4 Objective 4 which relates to commercial developments 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>therefore the request to amend them cannot be considered at this stage of the Plan making process.</p> <p>However, to note that the Draft Plan contains significant policy, which in addition to Policy CS5 and related Objectives 1 and 2 focuses on high intensity employment generating uses around high-capacity public transport nodes.</p> <p>Chapter 7 Sustainable Movement, SM1 Objective 4 and SM3 Objective 3 supports consolidated growth around public transport.</p> <p>Chapter 9 section 9.2.2 Urban Growth, Regeneration and Placemaking sets out how <i>“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 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”.</i></p> <p><i>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”</i> and also refers to the ongoing preparation of a masterplan for the Naas Road (City Edge) lands which will further inform land use for the area.</p>
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		<p>It is considered that Policy EDE4 Objective 4 is already very prescriptive in its intent to deliver intensive enterprise and employment in specific locations.</p> <p><i>“To direct people intensive enterprise and employment uses such as major office developments (>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>It should be further noted that under Material Amendment 9.3 it is proposed to amend Policy EDE5 SLO2 as follows: To provide for attractive campus style setting to encourage the investment of high-tech, hi-tech manufacturing and research and development enterprise at Grange Castle Business Park, the expansion of which will be subject to a master plan incorporating a local transport plan in consultation with NTA and TII.</p> <p>Given the above provisions set out in Chapter 9 it is considered that the locations identified in the submission to the Draft Plan, raised again in this submission were adequately covered in the policy and objectives set out in the Draft plan, as set out in the response at that time. No further amendments to the policy and objective can be made at this stage of the plan making process.</p>
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Chapter 8 – Community Infrastructure and Open Space

Chapter/ Section	Section 8.3 Social Inclusion and Community Development	
Amendment ref.	Amendment 8.1	
Page no.	287	
Policy/Objective No.	COS1 Objective 4 – include additional text.	
Text/Policy/Objective Amendment Wording		
<p>Amend COS1 Objective 4 from:</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>To read:</p> <p>To support the improvement, maintenance, upgrade and refurbishment of existing community based facilities and changing rooms within the County to meet current and future needs.</p>		
Submission No.	Submission Summary	CE response and recommendation
<p>SD-C226-25 Saggart Village Residents' Association</p> <p>SD-C226-40 Cllr Trevor Gilligan PC</p>	<p>The submissions have requested an amendment be added to Amendment 8.1 to complete a study of community and open spaces in Saggart, following publication of the 2022 census results and having regard to the population increase forecasted in the Draft Plan.</p>	<p>CE Response</p> <p>Amendment 8.1, which is indicated as the subject of this submission, outlines additional text proposed to be added to COS1 Objective 4</p> <p>from:</p>

		<p><i>To support the improvement, maintenance, upgrade and refurbishment of existing community based facilities within the County to meet current and future needs.</i></p> <p>To:</p> <p><i>To support the improvement, maintenance, upgrade and refurbishment of existing community based facilities and changing rooms within the County to meet current and future needs.</i></p> <p>Amendment 8.1 relates to whether or not to accept the inclusion of 'changing rooms' into the objective. The proposed further amendment to Amendment 8.1 to include a place specific study of community and open space in Saggart put forward in the submission is outside the scope of the amendment in this stage of the process.</p> <p>However, while not subject of this or any other amendment, it is noted that the Draft Plan contains COS3 Objective 5 which supports a Community Centre Strategy including the assessment of existing community floorspace / facilities within the County as follows:</p> <p><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>The Open Space Strategy being carried out by the Parks and Public Realm section of the Council has carried out a detailed audit of the open space provision within the County which can be assessed against any changes to population going forward.</p> <p>CE Recommendation</p> <p>No change to Amendment 8.1.</p>
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		Note: It is considered that the proposed further amendment is not minor in nature and is outside the scope of this stage of the plan making process.
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Chapter/ Section	Section 8.3.1 Local Social Inclusion Plans and Strategies	
Amendment ref.	Amendment 8.3	
Page no.	286	
Policy/Objective No.	Include additional text – 8.3.1 Local Social Inclusion Plans and Strategies	
Text/Policy/Objective Amendment Wording		
<p>Amend Section 8.3.1 to include the South Dublin Sports Partnership as a bullet point with the wording:</p> <ul style="list-style-type: none"> 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. 		
Submission No.	Submission Summary	CE response and recommendation
SD-C226-55 American Chamber of Commerce Ireland	The submission supports Amendment 8.3 and acknowledges the focus on the promotion of sport and is of the view that the continued investment in sport infrastructure, including recreational facilities, will be vital in supporting local communities and in bringing together	<p>CE Response</p> <p>The support of Amendment 8.3 is welcomed.</p> <p>Amendment 8.3 states:</p> <p>Amend Section 8.3.1 to include the South Dublin Sports Partnership as a bullet point with the wording:</p>

	<p>and uniting people from different communities and backgrounds.</p> <p>The submission supports the development of community, sports and cultural infrastructure which enhances Dublin's attractiveness as a destination of choice for people to come to Ireland to live and to work and is seen as an opportunity to further enhance the multicultural and multilingual aspects of Dublin's attractiveness.</p>	<ul style="list-style-type: none"> 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. <p>CE Recommendation</p> <p>No change to Amendment 8.3.</p>
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Chapter/ Section	8.4 Social/Community Infrastructure	
Amendment ref.	Amendment 8.4	
Page no.	288	
Policy/Objective No.	New SLO	
Text/Policy/Objective Amendment Wording		
<p>Insert new SLO to read:</p> <p>To provide for a Garda Station in Clonburris</p>		
Submission No.	Submission Summary	CE response and recommendation

<p>SD-C226-38 Deputy Emer Higgins</p>	<p>The submission supports the proposal to provide for a Garda Station in Clonburris.</p>	<p>CE Response</p> <p>The submission supports the proposal under Amendment 8.4 to insert a new SLO to read:</p> <p>To provide for a Garda Station in Clonburris.</p> <p>CE Recommendation</p> <p>No change to Amendment 8.4.</p>
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<p>Chapter/ Section</p>	<p>8.4 Social/Community Infrastructure</p>
<p>Amendment ref.</p>	<p>Amendment 8.5</p>
<p>Page no.</p>	<p>290</p>
<p>Policy/Objective No.</p>	<p>COS2 Objective 4 – include additional text.</p>
<p>Text/Policy/Objective Amendment Wording</p>	
<p>Amend COS2 Objective 4 from:</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>To read:</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 without negatively restricting the range of services provided in any one centre.</p>	

Submission No.	Submission Summary	CE response and recommendation
<p>SD-C226-58 Tallaght Community Council</p>	<p>The submission welcomes the COS2 Objective 4 which states:</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 without negatively restricting the range of services provided in any one centre.</p> <p>The submission is proposing additional wording “for all ages” to be included within this Objective 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 hubs without negatively restricting the range of services for all ages provided in any one centre.</p>	<p>CE Response</p> <p>The contents of this submission are acknowledged and noted. The submission welcomes the proposal under Amendment 8.4 to amend COS2 Objective 4 from:</p> <p>Amend COS2 Objective 4 from: 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>To: 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 without negatively restricting the range of services provided in any one centre.</p> <p>The submission is proposing additional wording “for all ages” to be included within COS2 Objective 4 to read:</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 without negatively restricting the range of services for all ages provided in any one centre.</p> <p>While the intent of the revised wording is acknowledged it is considered that it would not be appropriate in this instance given that the objective is supporting clustering while not negatively restricting the range of services provided in any one centre. As some of these centres are for schools and childcare facilities, which are age related, the current wording is more appropriate.</p> <p>CE Recommendation</p> <p>No change to Amendment 8.5.</p>

Chapter/ Section	Section 8.6 Sports Facilities and Centres	
Amendment ref.	Amendment 8.6	
Page no.	294	
Policy/Objective No.	COS4 Objective 1 – include additional text	
Text/Policy/Objective Amendment Wording		
<p>Amend COS4 Objective 1 from:</p> <p>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>To read:</p> <p>To promote the provision and management of high-quality, multi-functional, sport and recreational infrastructure across the County, in consultation with relevant stakeholders, 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>		
Submission No.	Submission Summary	CE response and recommendation
SD-C226-80 Cllr Vicki Casserly	<p>The submission welcomes Amendment 8.6.</p> <p>The submission emphasises that the promotion of the provision and management of high-quality, multi-functional, sport and recreational infrastructure across the County</p>	<p>The contents of both submissions are noted. The submissions welcome the proposal under Amendment 8.6 to amend COS4 Objective 1 from:</p> <p>Amend COS4 Objective 1 from:</p>

<p>SD-C226-55 American Chamber of Commerce Ireland</p>	<p>needs to be made in consultation with relevant stakeholders. It is indicated that very often the sporting clubs and organisations themselves that are best placed to inform the Council in the provision of facilities and infrastructure.</p> <p>The submission discusses in some detail the historic pattern of pitch allocations in the Lucan area, with particular emphasis on the club Na Gaeil Óga CLG, and states that the needs of all stakeholders are not being currently catered for.</p> <p>The submission indicates hope that the Amendment would encourage the Council to reflect the needs of all stakeholders in the provision of access to such services within the County and not just focus of the demands of incumbents.</p> <p>The submission from the American Chamber of Commerce supports Amendment 8.6 and acknowledges the focus on the promotion of sport and is of the view that the continued investment in sport infrastructure, including recreational facilities, will be vital in supporting local communities and in bringing together and uniting people from different communities and backgrounds.</p> <p>The submission supports the development of community, sports and cultural infrastructure which enhances Dublin's attractiveness as a destination of choice for people to come to Ireland to live and to work and is seen as an opportunity to further enhance the multicultural and multilingual aspects of Dublin's attractiveness.</p>	<p>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>To: To promote the provision and management of high-quality, multi-functional, sport and recreational infrastructure across the County, in consultation with relevant stakeholders, 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>While one submission contains considerable detail on pitch allocation in the Lucan area the thrust of the submission welcomes Amendment 8.6 and does not propose any further amendments to it.</p> <p>CE Recommendation No change to Amendment 8.6.</p>
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Chapter/ Section	Section 8.6 Sports Facilities and Centres	
Amendment ref.	Amendment 8.7	
Page no.	296	
Policy/Objective No.	COS4 Objective 15 – amend text	
Text/Policy/Objective Amendment Wording		
<p>Amend COS4 Objective 15 from:</p> <p>To provide a swimming pool with leisure facilities in the Rathfarnham/ Knocklyon/Firhouse areas.</p> <p>To read:</p> <p>To provide a swimming pool with leisure facilities In the Rathfarnham/ Knocklyon/ Firhouse/ Ballycullen areas</p>		
Submission No.	Submission Summary	CE response and recommendation
SD-C226-1 Proinsias Mac Fhlannchadha	The submission requests that the name of the area in this section should be amended to read Templeogue, Walkinstown, Rathfarnham, Firhouse as per Chapter 12, which will provide consistency across the development plan.	<p>CE Response</p> <p>The submission is asking to further amend Amendment 8.7, Amendment 8.7 relates to COS4 Objective 15 as follows from:</p> <p>To provide a swimming pool with leisure facilities in the Rathfarnham/ Knocklyon/Firhouse areas.</p> <p>To:</p> <p>To provide a swimming pool with leisure facilities In the Rathfarnham/ Knocklyon/ Firhouse/ Ballycullen areas.</p>

		<p>This amendment was brought forward by way of a motion to the Draft Plan and the inclusion of Ballycullen into the original objective was agreed following debate.</p> <p>The purpose of the submission is to replace the wording of: “Rathfarnham/ Knocklyon/ Firhouse/Ballycullen” in the objective to better reflect the Neighbourhood Areas set out in Chapter 12, in this case the “Templeogue, Walkinstown, Rathfarnham, Firhouse” Neighbourhood Area. While the intent of the submission is acknowledged, this would see explicit reference to Knocklyon and Ballycullen being omitted from COS4 Objective 15 and the inclusion of Templeogue and Walkinstown.</p> <p>While recognizing the intent behind the submission it is considered that the wording in the amendment was agreed by the Members for particular reasons and it is not recommended that it be further amended. It is also considered that the proposed further amendment is not minor in nature and would need to be subject to further consultation as it omits mention of Ballycullen and Knocklyon and includes mention of Templeogue and Walkinstown. As such, the proposal for further amendment cannot be considered at this stage of the plan making process.</p> <p>CE Recommendation</p> <p>No change to Amendment 8.7.</p> <p>Note: It is considered that the proposed further amendment is not minor in nature and is outside the scope of this stage of the plan making process.</p>
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Chapter/ Section	Section 8.6 Sports Facilities and Centres	
Amendment ref.	Amendment 8.8	
Page no.	296	
Policy/Objective No.	Insert new COS4 Objective 19	
Text/Policy/Objective Amendment Wording		
<p>Insert new COS4 Objective 19 to read:</p> <p>To ensure where possible and appropriate, that all public all-weather pitches provided by South Dublin County Council cater for all team sports and are large enough to cater for a full size GAA pitch.</p>		
Submission No.	Submission Summary	CE response and recommendation
SD-C226-55 American Chamber of Commerce Ireland	<p>The submission supports Amendment 8.8 and acknowledges the focus on the promotion of sport and is of the view that the continued investment in sport infrastructure, including recreational facilities, will be vital in supporting local communities and in bringing together and uniting people from different communities and backgrounds.</p> <p>The submission supports the development of community, sports and cultural infrastructure which enhances Dublin's attractiveness as a destination of choice for people to come to Ireland to live and to work and is seen as an opportunity to further enhance the multicultural and multilingual aspects of Dublin's attractiveness.</p>	<p>CE Response</p> <p>The contents of this submission, supporting the Amendment with rationale, are acknowledged and noted.</p> <p>Amendment 8.8 states:</p> <p>Insert new COS4 Objective 19 to read: To ensure where possible and appropriate, that all public all-weather pitches provided by South Dublin County Council cater for all team sports and are large enough to cater for a full size GAA pitch.</p> <p>CE Recommendation</p> <p>No change to Amendment 8.8.</p>

Chapter/ Section	Section 8.10 Primary and Post-Primary Schools	
Amendment ref.	Amendment 8.12	
Page no.	317	
Policy/Objective No.	Insert new Policy COS8(c)	
Text/Policy/Objective Amendment Wording		
Insert new Policy COS8(c) to read:		
<p>To review school site provision in the Development Plan, following the publication of full Census 2022 results, cross referencing with class size allocations being used during the period in question, engaging with the Department of Education, the elected members and through submissions by education stakeholders and the general public, so as to ensure accurate and adequate school provision requirements are identified and provided for primary and post primary schools at suitable locations.</p>		
Submission No.	Submission Summary	CE response and recommendation
SD-C226-63 Department of Education & Skills	The submission notes Amendment 8.12 which proposes the introduction of new policy COS8(c) which seeks to review school site provision in the development plan, following the publication of full census 2022 results, so as to ensure accurate and adequate school provision requirements are identified and provided for primary and post primary schools at suitable locations and notes that the Council will engage with the Department of Education and other stakeholders as part of the review process.	<p>CE Response</p> <p>The submission, under Amendment 8.12, welcomes the introduction of Policy COS8(c) which states:</p> <p>Policy COS8(c): To review school site provision in the Development Plan, following the publication of full Census 2022 results, cross referencing with class size allocations being used during the period in question, engaging with the Department of Education, the elected members and through submissions by education stakeholders and the general public, so as to ensure accurate and adequate school provision requirements are identified and provided for primary and post primary schools at suitable locations.</p>

	It is stated that the Department will also be reviewing the Census data and will be happy to engage with the Council on the matter.	CE Recommendation No change to Amendment 8.12.
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Chapter/ Section	Section 8.10 Primary and Post-Primary Schools
Amendment ref.	Amendment 8.13
Page no.	317
Policy/Objective No.	COS8 Objective 1 – include additional text.
Text/Policy/Objective Amendment Wording	
<p>Amend COS8 Objective 1 from:</p> <p>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.</p> <p>To read:</p> <p>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, to have regard to the 2008 Code of Practice on the Provision of Schools and the Planning System (or any superseding Code of Practice) 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.</p>	

Submission No.	Submission Summary	CE response and recommendation
SD-C226-63 Department of Education & Skills	<p>The submission notes Amendment 8.13 which seeks to change COS8 Objective 1 to include a reference to the 2008 Code of Practice on the Provision of Schools and the Planning System (or any superseding code of practice) and commends the inclusion of this amendment.</p>	<p>CE Response</p> <p>The submission welcomes amendment 8.13 of COS8 Objective 1 which states:</p> <p>Amend COS8 Objective 1 from: 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.</p> <p>To read: 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, to have regard to the 2008 Code of Practice on the Provision of Schools and the Planning System (or any superseding Code of Practice) 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.</p> <p>CE Recommendation</p> <p>No change to Amendment 8.13.</p>

Chapter/ Section	Section 8.10 Primary and Post-Primary Schools	
Amendment ref.	Amendment 8.14	
Page no.	317	
Policy/Objective No.	COS8 Objective 2 – include additional text.	
Text/Policy/Objective Amendment Wording		
<p>Amend COS8 Objective 2 from:</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>To read:</p> <p>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.</p>		
Submission No.	Submission Summary	CE response and recommendation
SD-C226-63 Department of Education & Skills	The submission notes Amendment 8.14 which seeks to change COS8 Objective 2 to include text that ensures that new school sites are retained for education use and commends the inclusion of this text as part of the amendment. However, the submission indicates that existing school sites and lands adjacent to existing schools should be equally protected for future educational use in order to allow for expansion of the schools, if required. The submission considers that the inclusion of buffer zones and land use designations that support education development adjacent to	<p>CE Response</p> <p>The contents of the submission are noted and acknowledged. The submission comments on Amendment 8.14 of COS8 Objective 2 which states:</p> <p>Amend COS8 Objective 2 from: 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>existing and established schools where required to facilitate potential future expansion will be critical in meeting school accommodation requirements arising in the existing built up areas of South County Dublin. It is submitted that in some instances, such provision may present the only visible solution for the provision of school places to meet the needs of the local community. In this regard, the submission seeks explicit support from the Council on this matter.</p>	<p>To: 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.</p> <p>The amendment was proposed in response to the submission made to the Draft Plan by the Department of Education. However, the Department is seeking further explicit support from the Council through the inclusion of buffer zones and land use designations that support education development adjacent to existing and established schools where required. This is to facilitate potential future expansion which is seen as critical in meeting school accommodation requirements arising in the existing built up areas of South County Dublin.</p> <p>This matter was considered as part of the Draft Plan and a response made in the CE Report which issued to the Members on 7th December 2021. While the positive intent of the submission is noted, it is considered that buffer zones and land use designations outside the school site in what are largely built-up areas would be overly generic and restrictive to other property owners. The proposed amendment is not considered minor in nature. It is considered preferable that the matter is approached in a more focused way by the Department in relation to the identification of the need of individual school sites and tailored solutions where necessary. The Council will continue to engage with the Department to assist in the identification of solutions where appropriate.</p> <p>CE Recommendation</p> <p>No change to Amendment 8.14.</p> <p>Note: It is considered that the proposed further amendment would not be minor in nature and is outside the scope of this stage of the plan making process.</p>
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Chapter/ Section	Section 8.10 Primary and Post-Primary Schools	
Amendment ref.	Amendment 8.15	
Page no.	317	
Policy/Objective No.	COS8 Objective 3 – amend text.	
Text/Policy/Objective Amendment Wording		
<p>Amend COS8 Objective 3 from:</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>To read:</p> <p>To require that suitable school places are available to schools to be provided in new communities, whether at an existing school or a new school on a phased basis in tandem with the delivery of residential development, unless the Department of Education requests otherwise and provides evidence to the Council and the elected members that existing schools can cater for requirements through extensions if necessary. ¶ Assuming 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>		
Submission No.	Submission Summary	CE response and recommendation
SD-C226-63 Department of Education & Skills	The submission acknowledges Amendment 8.15 and the rewording to the text of COS8 Objective 3 including the reference to existing schools.	CE Response

		<p>The submission acknowledges the reference to existing schools in the rewording of Amendment 8.15 of COS8 Objective 3, which reads as follows:</p> <p>Amend COS8 Objective 3 from: 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>To: To require that suitable school places are available to schools to be provided in new communities, whether at an existing school or a new school on a phased basis in tandem with the delivery of residential development, unless the Department of Education requests otherwise and provides evidence to the Council and the elected members that existing schools can cater for requirements through extensions if necessary. # Assuming 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>CE Recommendation No change to Amendment 8.15.</p>
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Chapter/ Section	Section 8.10 Primary and Post-Primary Schools	
Amendment ref.	Amendment 8.16	
Page no.	318	
Policy/Objective No.	Insert new COS8 Objective 11	
Text/Policy/Objective Amendment Wording		
<p>Insert new COS8 Objective 11 to read:</p> <p>To promote and support the use of public sports facilities by urban schools, during school hours, where feasible, while not diminishing the need for other facilities within the school grounds that could be shared with the community outside school hours as per COS8 Objective 8.</p>		
Submission No.	Submission Summary	CE response and recommendation
SD-C226-63 Department of Education & Skills	The submission is appreciative of the new objective COS8 Objective 11 that seeks to promote and support the use of public sports facilities by urban schools, during school hours, where feasible and commends the conclusion of this text.	<p>CE Response</p> <p>The submission is appreciative of Amendment 8.16 which inserts a new Objective of COS8 Objective 11 which states:</p> <p>Insert new COS8 Objective 11 to read: To promote and support the use of public sports facilities by urban schools, during school hours, where feasible, while not diminishing the need for other facilities within the school grounds that could be shared with the community outside school hours as per COS8 Objective 8.</p> <p>CE Recommendation</p> <p>No change to Amendment 8.16.</p>

Chapter/ Section	Section 8.10 Primary and Post-Primary Schools	
Amendment ref.	Amendment 8.17	
Page no.	318	
Policy/Objective No.	COS8 Objective 12 – insert new Objective	
Text/Policy/Objective Amendment Wording		
<p>Insert new Objective COS8 Objective 12 to read:</p> <p>To promote and support educational campus development, where feasible.</p>		
Submission No.	Submission Summary	CE response and recommendation
SD-C226-63 Department of Education & Skills	The submission is appreciative of the new objective COS8 Objective 12 that seeks to promote and support educational campus development where feasible and commends the inclusion of this text.	<p>CE Response</p> <p>The submission is appreciative of Amendment 8.17 which inserts a new Objective of COS8 Objective 12 which states:</p> <p>Insert new COS8 Objective 12 to read: To promote and support educational campus development, where feasible.</p> <p>CE Recommendation</p> <p>No change to Amendment 8.17.</p>

Chapter/ Section	Section 8.10 Primary and Post-Primary Schools	
Amendment ref.	Amendment 8.18	
Page no.	318	
Policy/Objective No.	COS8 Objective 13 – insert new Objective	
Text/Policy/Objective Amendment Wording		
<p>Insert new Objective COS8 Objective 13 to read:</p> <p>To explore with the Department of Education the potential to develop a GIS mapping layer of all school sites in the County.</p>		
Submission No.	Submission Summary	CE response and recommendation
SD-C226-63 Department of Education & Skills	<p>The submission notes Amendment 8.18 which inserts new objective COS8 Objective 13 that seeks to explore with the Department of Education the potential to develop a GIS mapping layer of all school sites and commends the inclusion of this text as this is considered very important in planning for future education requirements.</p> <p>The submission acknowledges the crucial importance of the ongoing work of the Council in ensuring sufficient and appropriate land is zoned for educational needs.</p>	<p>CE Response</p> <p>The submission welcomes Amendment 8.18 which inserts a new Objective of COS8 Objective 13 which states:</p> <p>Insert new Objective COS8 Objective 13 to read: To explore with the Department of Education the potential to develop a GIS mapping layer of all school sites in the County.</p> <p>The acknowledgement of the crucial importance of the ongoing work of the Council in ensuring sufficient and appropriate land is zoned for educational needs is welcomed. This work is facilitated by the ongoing engagement with the Department.</p> <p>CE Recommendation</p> <p>No change to Amendment 8.18.</p>

Chapter/ Section	Section 8.11 Higher Level Education and Further Education Facilities	
Amendment ref.	Amendment 8.20	
Page no.	319	
Policy/Objective No.	COS9 Objective 2 – amend text	
Text/Policy/Objective Amendment Wording		
<p>Amend COS9 Objective 2 from:</p> <p>To facilitate and encourage cross-collaboration between business and employment clusters and TU Dublin Tallaght Campus to drive research and innovation and increase employment opportunity.</p> <p>To read:</p> <p>To facilitate and encourage cross-collaboration between business and employment clusters and TU Dublin Tallaght Campus to drive research innovation and increase employment opportunities in the County.</p>		
Submission No.	Submission Summary	CE response and recommendation
SD-C226-58 Tallaght Community Council	<p>The submission rejects the deletion of “Tallaght Campus” from COS9 Objective 2 which states:</p> <p>To facilitate and encourage cross-collaboration between business and employment clusters and TU Dublin to drive</p>	<p>CE Response</p> <p>The submission comments on Amendment 8.20 which amends Objective of COS9 Objective 2 as follows:</p> <p>Amend COS9 Objective 2 from:</p> <p>To facilitate and encourage cross-collaboration between business and employment clusters and TU Dublin Tallaght Campus to drive research and innovation and increase employment opportunity.</p> <p>To:</p>

	<p>research innovation and increase employment opportunities in the County.</p>	<p>To facilitate and encourage cross-collaboration between business and employment clusters and TU Dublin Tallaght Campus to drive research innovation and increase employment opportunities in the County.</p> <p>The deletion of the words 'Tallaght Campus' was on the advice of comments received by the Planning Department from the Head of Strategic Projects at TU Dublin. The wording as proposed in the Amendment is considered more appropriate as it provides for the widest possible cross-collaboration with all of the different aspects of TU Dublin to encourage research innovation giving the potential for greater employment opportunities within the County.</p> <p>CE Recommendation</p> <p>No change to Amendment 8.20.</p>
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Chapter/ Section	Section 8.11 Higher Level Education and Further Education Facilities
Amendment ref.	Amendment 8.21
Page no.	320
Policy/Objective No.	COS9 Objective 4 – include additional text.
Text/Policy/Objective Amendment Wording	
<p>Amend COS9 Objective 4 from:</p> <p>To promote and facilitate the development of Tallaght as a centre for education and employment.</p> <p>To read:</p>	

To promote and facilitate the development of Tallaght as a centre for **learning**, education

Submission No.	Submission Summary	CE response and recommendation
<p>SD-C226-58 Tallaght Community Council</p>	<p>The submission concerns COS9 Objective 4</p> <p>Amend COS9 Objective 4 from:</p> <p>To promote and facilitate the development of Tallaght as a centre for education and employment.</p> <p>To read:</p> <p>To promote and facilitate the development of Tallaght as a centre for learning, education.</p> <p>The submission is requesting the word “employment” is not removed from the Objective.</p>	<p>CE Response</p> <p>The submission comments on Amendment 8.21 which concerns Objective of COS9 Objective 4. The Amendment should read:</p> <p>Amend COS9 Objective 4 from:</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 learning, education and employment.</p> <p>It is noted that the amendment as adopted by the Members included the word ‘employment’ and is correctly displayed as such on the Council’s Development Plan website. However, the word ‘employment’ was unintentionally omitted from the consultation portal. For clarity, it is recommended that the word ‘employment’ is re-inserted into the Amended COS9 Objective 4 to read:</p> <p>To promote and facilitate the development of Tallaght as a centre for learning, education, and employment.</p> <p>CE Recommendation</p> <p>Minor modification to Amendment 8.21.</p> <p>Ensure that COS9 Objective 4 reflects the inclusion of the word ‘employment’ to read:</p> <p>To promote and facilitate the development of Tallaght as a centre for learning, education, and employment.</p>

Chapter/ Section	Section 8.12 Libraries	
Amendment ref.	Amendment 8.22	
Page no.	321	
Policy/Objective No.	Insert COS10 Objective 5	
Text/Policy/Objective Amendment Wording		
<p>Insert new COS10 Objective 5 to read:</p> <p>To provide for a public library to serve the growing Ballycullen, Knocklyon and Firhouse communities and indoor civic space to meet the inter-generational requirements of local communities including performance and exhibition space, indoor sports and artistic, cultural and recreational use.</p>		
Submission No.	Submission Summary	CE response and recommendation
SD-C226-1 Proinsias Mac Fhlannchadha	The submissions raises the point that the area, as outlined in the proposed new Objective, is in the neighbourhood defined as Templeogue, Walkinstown, Rathfarnham, Firhouse as per Chapter 12 and therefore proposes that the wording be amended to align with the title of this neighbourhood for consistency across the development plan. The submission also notes that there are already libraries in Ballyroan and Whitechurch.	<p>CE Response</p> <p>The contents of this submission are acknowledged and noted. The submission is requesting to amend Amendment 8.22, which inserts a new Objective COS10 Objective 5 as follows:</p> <p>To provide for a public library to serve the growing Ballycullen, Knocklyon and Firhouse communities and indoor civic space to meet the inter-generational requirements of local communities including performance and exhibition space, indoor sports and artistic, cultural, and recreational use.</p> <p>This amendment was brought forward and passed by way of a motion to the Draft Plan. The motion was based on a view that the local communities named had exhausted their community facilities and there was a need to cater for community needs, performance</p>

		<p>and exhibition space, indoor sports, and artistic, cultural, and recreational use.</p> <p>This Objective sought to identify a new public library to serve the communities of Ballycullen, Knocklyon and Firhouse specifically. It was noted in the CE Response to the motion that South Dublin Mobile Libraries are at these locations at the following days:</p> <p>Ballycullen: Every Tuesday at Hunters Walk from 4-5pm and Parklands Road from 6-6:50pm. Every Wednesday at Woodstown Park from 3-3:50pm.</p> <p>Knocklyon: Libraries close by include Ballyroan and Terenure Libraries</p> <p>Firhouse: Every Tuesday at Killakee Green from 7-7:55pm</p> <p>This submission notes that Chapter 12 designates Ballycullen, Knocklyon and Firhouse within the neighbourhood of ‘Templeogue, Walkinstown, Ballycullen, Firhouse’. The purpose of the submission is to replace the wording of the following neighbourhoods “Ballycullen, Knocklyon and Firhouse” to the following wording “Templeogue, Walkinstown, Rathfarnham, Firhouse”, in line with Chapter 12 neighborhood designations.</p> <p>While recognizing the intent behind the submission it is considered that the wording in the amendment was agreed by the Members for particular reasons and it is not recommended that it be further amended. It is also considered that the proposed further amendment is significant and not minor in nature and would need to be subject to further consultation as it omits mention of Ballycullen and Knocklyon and includes mention of Templeogue, Walkinstown and Rathfarnham. As such, the proposal for further amendment cannot be considered at this stage of the plan making process.</p> <p>CE Recommendation</p> <p>No change to Amendment 8.22.</p>
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		Note: It is considered that the proposed further amendment would not be minor in nature and is outside the scope of this stage of the plan making process.
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Chapter/ Section	Section 8.13 Arts and Cultural Facilities	
Amendment ref.	Amendment 8.23	
Page no.	323	
Policy/Objective No.	COS11 Objective 8 – amend text	
Text/Policy/Objective Amendment Wording		
<p>Amend COS11 Objective 8 from:</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>To read:</p> <p>To prepare a feasibility study for the development of Arts and Culture Infrastructure within the County, taking into account of areas without any such infrastructure, and transport links.</p>		
Submission No.	Submission Summary	CE response and recommendation
SD-C226-58 Tallaght Community Council	The submission from Tallaght Community Council requests clarity from COS11 Objective 8 which states:	<p>CE Response</p> <p>The submission is querying how COS11 Objective 8, the subject of Amendment 8.23, sits beneath the Arts and Culture cluster Tallaght was identified as and the concept of the County town being a</p>

	<p>To prepare a feasibility study for the development of Arts and Culture Infrastructure within the County, taking into account areas without any such infrastructure, and transport links.</p> <p>The submission queries “how this objective sits beneath the Arts and Culture cluster Tallaght was identified as and the concept of the County town being a central location for amenities and services in order to establish, and succeed”.</p>	<p>central location for amenities and services in order to establish, and succeed.</p> <p>Amendment 8.23 - Amend COS11 Objective 8 from: To prepare a feasibility study for the development of Arts and Culture Infrastructure within the County, taking account of transport links.</p> <p>To: To prepare a feasibility study for the development of Arts and Culture Infrastructure within the County, taking into account of areas without any such infrastructure, and transport links.</p> <p>The County Development Plan is a strategic plan setting out policy and objectives for land use within the County. COS11 Objective 8 sets out an objective for Arts and Culture on a county-wide basis, inclusive of Tallaght and all other areas. It is noted that COS11 Objective 6 in the Draft Plan indicates the pursuit of the development of a Heritage Centre in Tallaght and that COS11 Objective 4 facilitates the continued development of arts and cultural facilities through the implementation of the <i>South Dublin Arts Strategy</i> and the <i>South Dublin County Cultural and Creativity Strategy</i>.</p> <p>The submission does not outline any proposed further amendments to Amendment 8.23.</p> <p>CE Recommendation</p> <p>No change to Amendment 8.23.</p>
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<p>Non-Amendment Issues</p>
<p><i>The following issues refer to material or subject matter that was not included in either the ‘Proposed Amendments’ document or as the mapping of the proposed amendments that were placed on public display between 29th March and 26th April 2022. Consequently, and in accordance with Sections 12(7) to 12(10) of the Planning and Development Act 2000 (as amended) the following issues raised in submission(s) cannot be considered at this stage in the process and therefore do not result in any amendments to the Draft Plan.</i></p>

Submission No.	Submission Summary	CE response and recommendation
SD-C226-63 Department of Education & Skills	<p>Department of Education</p> <p>As a general comment, the Department points out that reference in the Draft Plan to the Department's title should read the Department of Education.</p>	<p>CE Response</p> <p>The requirement to ensure that the Department's most recent title is correctly inserted into the final Development Plan is noted.</p>

Chapter 9 – Economic Development and Employment

Chapter/ Section	9.0.1 Planning Policy Context
Amendment ref.	Amendment 9.1
Page no.	328
Policy/Objective No.	9.0.1 Planning Policy Context, second paragraph
Text/Policy/Objective Amendment Wording	
<p>Amend text under 9.0.1 Planning Policy Context:</p> <p>From:</p> <p>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.</p> <p>To read:</p> <p>Nationally, under NPO 6 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 Tallaght and Naas Road regeneration area areas.</p>	

Amendment 9.1		
Submission No.	Submission Summary	CE response and recommendation
SD-C226-1 Proinsias Mac Fhlannchadha	The submission requests that that the reference(s) to "Naas Road regeneration area" should be updated to "City Edge Regeneration Area".	<p>CE Response:</p> <p>Amendment 9.1 relates to the insertion of the name 'Tallaght' into a sentence in the second paragraph of section 9.0.1 Planning Policy Context. The sentence subject to the Amendment reads:</p> <p>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 Clonburriss and Adamstown SDZs and the Tallaght and Naas Road regeneration areas.</p> <p>As highlighted in Chapter 2: Core Strategy and Settlement Strategy, under Material Amendment 2.4 it states:</p> <p><i>'Note: All references to Naas Road/Ballymount Lands throughout Chapter 2 to be updated to City Edge/City Edge Strategic Framework.'</i></p> <p>This will continue throughout the County Development Plan as an edit for consistency in text.</p> <p>CE Recommendation:</p> <p>Minor modification to Amendment 9.1 to amend the last sentence in the second paragraph of section 9.0.1 from:</p>

		<p>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 Tallaght and Naas Road regeneration areas.</p> <p>To</p> <p>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 Tallaght and Naas Road regeneration City Edge / City Edge Strategic Framework area.</p>
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Chapter/ Section	Section 9.2.2 Urban Growth, regeneration and Placemaking
Amendment ref.	Amendment 9.2
Page no.	338
Policy/Objective No.	EDE4 Objective 14
Text/Policy/Objective Amendment Wording	
Amend EDE4 Objective 14 from:	

To prepare a LAP for Clondalkin, the extent of the boundary to be defined, which will be guided by the Local Area Plans Guidelines for Planning Authorities, 2013 (Department of the Environment, Community and Local Government) or any superseding guidelines and which will incorporate:

- 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.
- Traffic movement study

To read:

To prepare a LAP for Clondalkin, the extent of the boundary to be defined, which will be guided by the Local Area Plans Guidelines for Planning Authorities, 2013 (Department of the Environment, Community and Local Government) or any superseding guidelines and which will incorporate:

- 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.
- ~~Traffic movement study~~ Local Transport Plan

Submission No.	Submission Summary	CE response and recommendation
SD-C226-6 National Transport Authority https://consult.sdublincoco.ie/en/submission/sd-c226-1	The NTA has reviewed the proposed Material Amendments to the Draft South Dublin County Development Plan 2022-2028 having regard to the Transport Strategy for the Greater Dublin Area 2016-2035 and the recently issued Draft	<p>CE Response:</p> <p>The support for Material Amendment 9.2 is noted and welcomed.</p> <p>CE Recommendation:</p>

	<p>Transport Strategy for the Greater Dublin Area 2022-2042.</p> <p>The submission acknowledges the inclusion of the recommendations made following comments on the 15th September 2021 and is supportive of the proposed Material Amendment 9.2.</p>	No change to Amendment 9.2.
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Chapter/ Section	Section 9.2.3 Building on Clusters	
Amendment ref.	Amendment 9.3	
Page no.	340	
Policy/Objective No.	EDE5 SLO 2	
Text/Policy/Objective Amendment Wording		
<p>Amend EDE5 SLO 2 from:</p> <p>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.</p> <p>To read:</p> <p>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, the expansion of which will be subject to a masterplan incorporating a local transport plan in consultation with the NTA and TII.</p>		
Submission No.	Submission Summary	CE response and recommendation

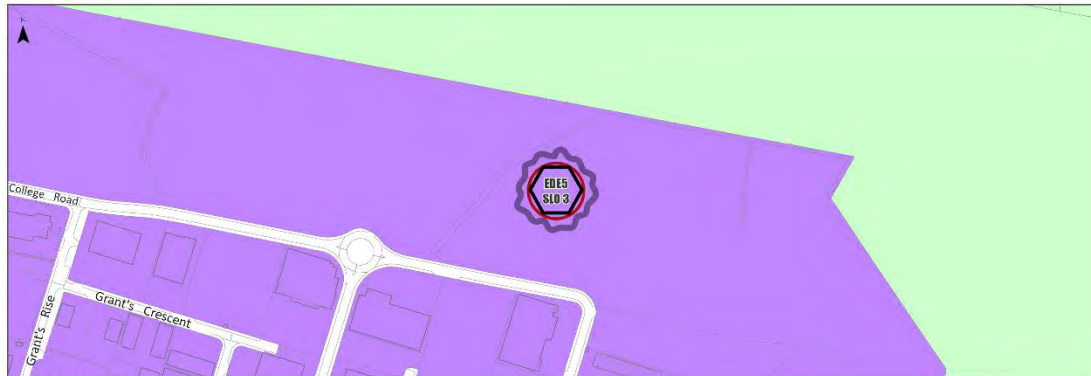
<p>SD-C226-6 National Transport Authority</p> <p>https://consult.sdublincoco.ie/en/submission/sd-c226-1</p>	<p>The NTA has reviewed the proposed Material Amendments to the Draft South Dublin County Development Plan 2022-2028 having regard to the Transport Strategy for the Greater Dublin Area 2016-2035 and the recently issued Draft Transport Strategy for the Greater Dublin Area 2022-2042.</p> <p>The submission acknowledges the inclusion of the recommendations made following comments on the 15th September 2021 and is supportive of the proposed Material Amendment 9.3.</p>	<p>CE Response:</p> <p>The support for Material Amendment 9.3 is noted and welcomed.</p> <p>CE Recommendation:</p> <p>No change to Amendment 9.3.</p>
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Chapter/ Section	Section 9.2.3 Building on Clusters
Amendment ref.	Amendment 9.4
Page no.	340
Policy/Objective No.	EDE5 SLO 3
Text/Policy/Objective Amendment Wording	
<p>Insert new EDE5 SLO 3 to read;</p> <p>'To ensure development on lands within Greenogue Business Park will be subject to site specific flood alleviation measures forming part of any future planning application for these lands.'</p>	

Proposed Amendment Ref: 9.4



Draft Plan as Published



Proposed Amendment: SLO added

Amendment 9.4

Submission No.

Submission Summary

CE response and recommendation

<p>SD-C226-26 South Dublin Conservation Society</p>	<p>The submission suggests that if this objective is to expand development onto further lands which are located within a flood zone then this objective should be removed. It is considered that the proposal goes against best practice in regard to flood management and alleviation.</p> <p>The submission further suggests that natural vegetation, planting of willow, etc should be encouraged to help slow down flooding and refers to the proposed Map 15 Flood Risk Assessment highlighting that Greenogue Estate is already under pressure from flooding / flood risk.</p>	<p>CE Response:</p> <p>Amendment 9.4 inserts a new EDE5 SLO3 onto lands which are proposed to be rezoned from RU to EE as set out in Amendment 2.20. Amendment 9.4 states:</p> <p><i>'To ensure development on lands within Greenogue Business Park will be subject to site specific flood alleviation measures forming part of any future planning application for these lands.'</i></p> <p>The SLO is integrally related to the proposed zoning of the lands. The CE has recommended that the zoning to EE is not adopted, in line with the OPR and OPW recommendations and the recommendations of the CE at Draft Plan stage.</p> <p>Should the proposed rezoning fall then this associated SLO under Amendment 9.4 should also fall as it is directly related to the zoning and specifically to the flooding issues on the lands.</p> <p>CE Recommendation:</p> <p>Remove EDE5 SLO3 from the Draft Plan in the event that Amendment 2.20 falls.</p> <p>Note: This Amendment 9.4 is directly linked to the outcome of Amendment 2.20</p>
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<p>Chapter/ Section</p>	<p>Section 9.4.4 Additional Retail Floorspace and Sequential Growth</p>
<p>Amendment ref.</p>	<p>Amendment 9.8</p>

Page no.	348	
Policy/Objective No.	Section 9.4.4 Third Paragraph	
Text/Policy/Objective Amendment Wording		
Amend text from:		
<p>The capacity for retail developments on the Tallaght LAP lands and the planned SDZ lands at Adamstown and Clonburris align with planned population growth and are considered to be sufficient to accommodate population growth and the expenditure needs of these areas. The SDZ District Centres will reflect a higher density urban environment and will cater for a varied range of comparison shopping, including the possibility of anchor department stores 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>		
To Read:		
<p>The capacity for retail developments on the Tallaght LAP lands and the planned SDZ lands at Adamstown and Clonburris align with planned population growth and are considered to be sufficient to accommodate population growth and the expenditure needs of these areas. The SDZ District Centres will reflect a higher density urban environment and will cater for a varied range of comparison shopping, including the possibility of anchor department stores 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>		
Amendment 9.8		
Submission No.	Submission Summary	CE response and recommendation
SD-C226-54 Tallaght Community Council SD-C226-27 CAIRN Plc	<p>This Submission asks the question why the removal of Department Stores at street Level throughout the County. If the primary goal is to have a vibrant street at ground level, if the only feasible option is a Department Store, why is it now prohibited?</p>	<p>CE Response:</p> <p>It is noted that one submission supports the Amendment and one submission questions the rationale for the removal of 'Department Stores at street level throughout the County'. However, there is a misunderstanding of the Amendment in that the removal of the</p>

	<p>The submission requests that the proposed Material Amendment nos. 9.8 is included in the final adopted Plan for South Dublin County Council. It is respectfully 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>sentence from section 9.4.4 relates only to Adamstown and Clonburris and does not apply county wide as suggested in a submission.</p> <p>It was considered appropriate to amend the wording to delete reference to ‘including the possibility of anchor department stores on main shopping streets’, where it had applied to the Level 3 District Centres of Clonburris and Adamstown so that the text will read:</p> <p><i>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.</i></p> <p>This was considered appropriate to ensure that the text in this paragraph of the Draft Plan is consistent with Table 9.1 of the Draft Plan which describes the service type relevant for the Level 3 District Centres of Clonburris and Adamstown and which also better reflects the Planning Schemes as adopted.</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>
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		CE Recommendation: No change to Amendment 9.8.
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Chapter/ Section	Section 9.5.4 District Centre	
Amendment ref.	Amendment 9.10	
Page no.	355	
Policy/Objective No.	EDE12 Objective 3	
Text/Policy/Objective Amendment Wording		
<p>Amend EDE12 Objective 3 from:</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>To read:</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 having regard to the need to provide a sustainable retail mix including department stores and shopping centres that facilitates walking, cycling and the use of public transport and reduces car journeys outside the SDZ for many retail needs.</p>		
Amendment 9.10		
Submission No.	Submission Summary	CE response and recommendation

<p>SD-C226-27 CAIRN Plc</p>	<p>The submission requests that the proposed Material Amendment nos. 9.10 is included in the final adopted Plan for South Dublin County Council. It is respectfully 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>CE Response:</p> <p>The submission requests that Amendment 9.10 is included in the final plan.</p> <p>Amendment 9.10 amends EDE12 Objective 3 from:</p> <p><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>To:</p> <p><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 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.</i></p> <p>It was considered appropriate to adjust EDE12 Objective 3, so that it supports the adopted planning schemes without the listing of specific retail uses.</p> <p>CE Recommendation:</p> <p>No change to Amendment 9.10.</p>
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Chapter/ Section	Section 9.9 Tourism and Leisure	
Amendment ref.	Amendment 9.15	
Page no.	359	
Policy/Objective No.	EDE19 Objective 3	
Text/Policy/Objective Amendment Wording		
<p>Amend EDE19 Objective 3 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 Read:</p> <p>To support the development of the Dublin Mountains Visitor Centre at Hell Fire and Massy’s Wood in accordance with permissions granted by An Bord Pleanála in June 2020 or any amending permissions subject to planning.</p>		
Amendment 9.15		
Submission No.	Submission Summary	CE response and recommendation
SD-C226-26 South Dublin Conservation Society	<p>The submission wishes to see EDE19 Objective 3 removed from the Plan.</p> <p>It is contended that SDCC should explore the usage of Friarstown House (in public ownership) or acquired through purchase the former stable buildings of Killakee House (Killakee Restaurant) or</p>	<p>CE Response:</p> <p>The issue raised is noted.</p> <p>It is noted that the Corporate Plan 2020-2024, adopted by the Members of South Dublin County Council includes the</p>

	<p>Orlagh House (Formerly known as Orlagh College) as a visitor centre for the Dublin Mountains.</p> <p>The submission requests that SDCC utilise historic buildings as visitor attractions and puts forward the following proposed wording be considered for inclusion in the Draft County Development Plan:</p> <p><i>“Promote and assist the development of visitor facilities in existing historic buildings alongside or very near to visitor attractions including mountain regions, greenways, blueways,etc., having due regard for built and natural heritage.”</i></p>	<p>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 Pleanála and is currently subject to Judicial Review. The submission reflects a similar submission to the Draft Plan which was debated as part of the decision to make amendments to the Draft and for which the current amendment was proposed. At this stage of the plan making process the Plan can be made with the proposed amendment or without it. Therefore, the removal of the entire objective, which would neither accord with the amendment or the objective as written in the Draft Plan, is not an option for this stage of the Plan making process</p> <p>CE Recommendation:</p> <p>No change to Amendment 9.15.</p> <p>Note: It is considered that the proposed further amendment is not minor in nature and is outside the scope of this stage of the plan making process.</p>
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Chapter/ Section	Section 9.9 Tourism and Leisure
Amendment ref.	Amendment 9.21
Page no.	360
Policy/Objective No.	EDE21 Objective 4

Text/Policy/Objective Amendment Wording

Amend EDE21 Objective 4 from:

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.

To Read:

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, **geology** and other features to be found along the rivers ~~in the County at strategic locations~~ and at other strategic locations within the County.

Amendment 9.21

Submission No.	Submission Summary	CE response and recommendation
<p>SD-C226-54 Tallaght Community Council</p> <p>SD-C226-32 Department of Communications, Climate Action and Environment</p>	<p>One submission seeks to amend EDE21 Objective 4 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, geology and other features to be found along the rivers and at other strategic locations within the County.</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,</p>	<p>CE Response:</p> <p>These submissions relate to Amendment 9.21, which amends EDE21 Objective 4 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 Read:</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, geology and</p>

	<p>geology and other features to be found along the rivers <i>in the County at strategic locations and</i> at other strategic locations within the County, <i>consulting with local communities.</i></p> <p>The submission suggests that local communities be involved as local knowledge is often richer than central resources.</p> <p>A second submission commends the inclusion of the material amendment.</p>	<p>other features to be found along the rivers and at other strategic locations within the County.</p> <p>While one submission welcomes the amendment another submission looks to change the wording of this objective. The objective relates to the implementation of signage in accordance with the Tourism and Signage Strategies for the County. Both of these strategies are in place and have gone through different processes. The signage strategy is largely implementing Failte Ireland signage guidance, which is about providing street directions. The approach, locations and programme for the signage has been agreed with the Council's Area Committees and a design team is due to be appointed. Separately, the current Tourism Strategy is due for review and it is intended that public consultation will inform the review.</p> <p>While public consultation will form part of the review of the Tourism Strategy it is not considered appropriate to include reference to public consultation in the objective given the different nature of the two strategies, that is, the Signage Strategy recently agreed and the Tourism Strategy due for review.</p> <p>CE Recommendation:</p> <p>No change to Amendment 9.21</p>
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Chapter/ Section	Section 9.10 Quarries and Mineral Extraction	
Amendment ref.	Amendment 9.27	
Page no.	365	
Policy/Objective No.	Amend EDE25 Objective 1	
Text/Policy/Objective Amendment Wording		
Amend EDE25 Objective 1 from:		
To facilitate mineral extraction in suitable locations subject to the protection of amenity and environmental quality, including air quality and noise pollution.		
To Read:		
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 Geological Heritage Guidelines for the Extractive Industry' (GSI and Concrete Federation of Ireland, 2008).		
Amendment 9.27		
Submission No.	Submission Summary	CE response and recommendation
SD-C226-32 Department of Communications, Climate Action and Environment	The submission welcomes the inclusion of the Geological Heritage Guidelines for Extractive Industries guideline document as part of EDE25 Objective 1	<p>CE Response:</p> <p>The submission acknowledges the reference to the Geological Heritage Guidelines for the Extractive Industry of Amendment 9.27 of EDE25 Objective 1, which reads as follows:</p> <p>Amend EDE25 Objective 1 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 Read:</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 Geological Heritage Guidelines for the Extractive Industry' (GSI and Concrete Federation of Ireland, 2008).</p> <p>CE Recommendation:</p> <p>No change to Amendment 9.27.</p>
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Chapter 10 - Energy

Chapter/ Section	10.2 Energy Measures	
Amendment ref.	Amendment 10.1	
Page no.	385	
Policy/Objective No.	Amend Policy E9	
Text/Policy/Objective Amendment Wording		
<p>To amend Policy E9: Small to Medium Scale Wind Energy Schemes from: Encourage small to medium scale wind energy developments within industrial or business parks and support small community-based proposals in urban areas provided they do not negatively impact upon the environmental quality, and visual or residential amenities of the area.</p> <p>To Read: Encourage small and medium scale wind energy developments within industrial or business parks and support small community-based proposals for domestic use in urban areas and feedback of surplus to the grid, provided they do not negatively impact upon the environmental quality and visual or residential amenities of the area.</p>		
Amendment 10.1		
Submission No.	Submission Summary	CE response and recommendation
SD-C226-26 South Dublin Conservation Society	<p>The submission proposes further amendments to Amendment 10.1 to read as follows:</p> <p>Encourage small and medium scale wind energy developments within industrial or business parks and support small community-based proposals</p>	<p>CE Response:</p> <p>The issue raised is noted.</p> <p>The issue of remuneration is one for the relevant legislation and is not an issue for the County Development Plan. It is considered that the inclusion of storage batteries as standard is overly prescriptive</p>

	<p>for domestic use in urban areas, to include storage batteries as standard, and feedback of surplus to the grid, with commensurate remuneration as soon as this has been legislated for, provided they do not negatively impact upon the environmental quality and visual or residential amenities of the area.</p>	<p>for this objective both in terms of limiting any alternative solutions which may occur over the lifetime of the Plan and in terms of the scale of the wind energy the objective is catering for.</p> <p>CE Recommendation:</p> <p>No change to amendment 10.1.</p> <p>Note: It is considered that the proposed further amendment is not minor in nature and is outside the scope of this stage of the plan making process.</p>
<p>SD-C226-32 Department of Communications, Climate Action and Environment</p>	<p>The submission requests that the scope of Amendment 10.1 be expanded with the wording of Policy E9 amended to read as follows:</p> <p>From:</p> <p><i>Encourage small and medium scale wind energy developments within industrial or business parks and support small community-based proposals for domestic use in urban areas and feedback of surplus to the grid, provided they do not negatively impact upon the environmental quality and visual or residential amenities of the area.</i></p> <p>To:</p> <p><i>'Encourage small and medium scale wind energy developments within industrial or business parks and support small community-based proposals for domestic use in urban areas that can encourage</i></p>	<p>CE Response:</p> <p>Amendment 10.1, which is indicated as the subject of this submission, outlines additional text proposed to be added to Policy E9: Small to Medium Scale Wind Energy Schemes from:</p> <p>Encourage small to medium scale wind energy developments within industrial or business parks and support small community-based proposals in urban areas provided they do not negatively impact upon the environmental quality, and visual or residential amenities of the area.</p> <p>To:</p> <p><i>Encourage small and medium scale wind energy developments within industrial or business parks and support small community-based proposals for domestic use in urban areas and feedback of surplus to the grid, provided they do not negatively impact</i></p>

	<p><i>self-consumption on a community scale whilst feeding any surplus back to the grid, provided they do not negatively impact upon the environmental quality and visual or residential amenities of the area.'</i></p>	<p><i>upon the environmental quality and visual or residential amenities of the area.</i></p> <p>The Department of Communications, Climate Action and Environment have brought forward a change for Amendment 10.1 which clarifies in greater detail what is being set out in the original Amendment.</p> <p>This is deemed reasonable to include in the Plan and for clarity, it is recommended that the wording to Policy E9 is amended.</p> <p>CE Recommendation:</p> <p>Minor modification to Amendment 10.1 as follows:</p> <p>From:</p> <p><i>Encourage small and medium scale wind energy developments within industrial or business parks and support small community-based proposals for domestic use in urban areas and feedback of surplus to the grid, provided they do not negatively impact upon the environmental quality and visual or residential amenities of the area.</i></p> <p>To:</p> <p><i>'Encourage small and medium scale wind energy developments within industrial or business parks and support small community-based proposals for domestic use in urban areas areas and feedback of surplus to the grid that can encourage self-consumption on a community scale whilst feeding any</i></p>
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		<i>surplus back to the grid, provided they do not negatively impact upon the environmental quality and visual or residential amenities of the area.'</i>
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Non-Amendment Issue

The following issues refer to material or subject matter that was not included in either the 'Proposed Amendments' document or as the mapping of the proposed amendments that were placed on public display between 29th March and 26th April 2022. Consequently, and in accordance with Sections 12(7) to 12(10) of the Planning and Development Act 2000 (as amended) the following issues raised in submission(s) cannot be considered at this stage in the process and therefore do not result in any amendments to the Draft Plan.

Submission No.	Submission Summary	CE response and recommendation
SD-C226-1 Proinsias Mac Fhlannchadha	The submission is not specific to a particular amendment but generally requests that all references to Ireland's Climate Action Plan 2019 throughout the Development Plan Document(s) need to be updated to reflect the fact that this is now Ireland's Climate Action Plan (2021).	CE Response: In line with the general updating of factual information and document titles throughout the Draft Plan in preparation for publication, reference to the Climate Action Plan 2021 will replace the reference to the Climate Action Plan 2019 throughout the document where relevant.

Chapter 11 – Infrastructure and Environmental Services

Chapter/ Section	New Section 11.5 Electricity Infrastructure
Amendment ref.	Amendment 11.7
Page no.	404
Policy/Objective No.	Insert New Section, Policy and Objectives 11.5 Electricity Infrastructure
Text/Policy/Objective Amendment Wording	
<p>Insert new Section 11.5 Electricity Infrastructure, with Policy and Objectives to read:</p> <p>Section 11.5 Electricity Infrastructure</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>Policy IE6 Electricity Infrastructure</p> <p>Protect the existing electricity infrastructure and support the development of a safe, secure and reliable supply of electricity and the development of enhanced electricity networks as well as new transmission infrastructure projects subject to the relevant environmental assessments.</p> <p>IE6 Objective 1: 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>IE6 Objective 2: 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>	

IE6 Objective 3: 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

IE6 Objective 4: 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.

IE6 Objective 5: 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.

Amendment 11.7

Submission No.	Submission Summary	CE response and recommendation
<p>CVQ-8437 EirGrid plc</p> <p>SD-C226-55 American Chamber of Commerce Ireland</p> <p>SD-C226-32 Department of Communications, Climate Action and Environment</p>	<p>A submission welcomes the reference and emphasis placed on electricity transmission in the Draft Development Plan and in particular proposed amendment 11.7 which relates to the inclusion of a new section 11.5 electricity infrastructure and related policy and objectives. It is stated that such measures will contribute towards meeting national targets for renewable energy, addressing climate change and supply security for the Dublin region.</p> <p>A submission believes that the insertion of the new section 'Policy and Objectives 11.5 Electricity Infrastructure' may be beneficial and that the objectives outlined in this section, including to support micro grid development, offshore renewable energy resources and strengthening the electricity transmission and distribution network will be positive in supporting Ireland's overall climate goals. Support given to transition to a carbon neutral economy by 2050.</p>	<p>CE Response:</p> <p>The welcoming of Amendment 11.7 with the supporting reasons is noted.</p> <p>The proposed change to the name of the Department in the reference in IE6 Objective 3 is acceptable.</p> <p>CE Recommendation:</p> <p>Minor modification to Amendment 11.7 to reflect the change of name of the Department of Environment, Climate and Communications from:</p> <p>IE6 Objective 3: 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</p>

	<p>The submission from the Department considers that the inclusion of section 11.5 Electricity Infrastructure is appropriate and is broadly reflective of Government policy and the Regional Planning Policies. It is further noted that the contents of this section can support the measures set out in the National Energy Security Framework (April 2022)</p> <p>The submission notes and welcomes the inclusion of a reference to the Offshore Renewable Energy Development Plan and any successor thereto (i.e., OREDPII) at the newly proposed Section 11.5, Policy no. IE6 Objective 3 (Amendment no. 11.7). It is requested however that the name of the Department be amended to the Department of Environment, Climate and Communications in same.</p>	<p>thereof including any associated domestic and international grid connection enhancements in line with RPO 10.24</p> <p>To</p> <p>IE6 Objective 3: To support the sustainable development of Ireland's offshore renewable energy resources in accordance with the Department of Communications, Energy and Natural Resources Environment, Climate and Communications '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>
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Chapter/ Section	11.8 Airports and Aerodromes
Amendment ref.	Amendment 11.14
Page no.	590
Policy/Objective No.	Amend Section 13.9.3 (iii) Lighting
Text/Policy/Objective Amendment Wording	
<p>Amend Section 13.9.3 (iii) Lighting to read:</p> <p>13.9.3(iii) Lighting (page 590)</p> <p>Co-ordination of Landscape Proposals and Public Lighting (and other utilities)</p>	

The co-ordination of proposed Landscape Plans and Public Lighting Plans (and other utilities) to include Environmental Zones, where applicable, 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 practical, viable and compatible.

All residential developments above 5 residential units and all other proposed developments shall submit a full lighting plan. This shall be a co-ordinated plan showing the proposed landscape plan, public lighting and other services and any environmental/ecological related requirements and that these are prepared in accordance with industry best practice and in compliance with:

- The most up to date edition of EN13201
- Institute of Lighting Professionals (ILP) Guidance Note 1 The Reduction of Obtrusive Light, 2020
- Relevant documents of the Society of Light and Lighting
- South Dublin County Council's Public Lighting Specification, 2016, (as updated),

Lighting should be designed to minimise light pollution and should be designed to avoid light spillage, the creation of glare or the emission of light above a horizontal plane.

External lighting schemes and illuminated signage on commercial and industrial premises, sports grounds, and other community facilities, should be designed, installed and operated so as to prevent nuisance to adjoining occupiers and road users, in the interests of amenity and public safety.

Where sites are environmentally sensitive, a lighting plan for Environmental Zones will be required.

Environmental Zones for Lighting Plan

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,

The proposals 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.

The proposals should provide for 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 and so on.

Where applicable, the provisions of the “Institute of Lighting Professionals” Guidance Document Note. 8 Bats and Artificial Lighting, 2018, shall be applied:

- Bat sensitive lighting installations to be managed/mitigated by dynamic lighting systems. Warm White (2,700K) lanterns may be used in designated bat sensitive areas only. In assessing planning applications or preparing plans, the avoidance and mitigation measures as outlined in the Guidance Document Note 8, referred to above, are advised to be incorporated at the earliest stage of development and lighting designs.

In general, non-vehicular routes through green spaces should be lit only if they are permeability routes, outside designated dark zones and lighting is agreed with the public realm section as well as the public lighting section of the Council. The above is subject to assessment regarding the sensitivity of ecology in the area.

Amendment 11.14

Submission No.	Submission Summary	CE response and recommendation
<p>SD-C226-26 South Dublin Conservation Society</p>	<p>The submission suggests the following edits to Amendment 11.14:</p> <p>Institute of Lighting Professionals (ILP) Guidance Note 1 The Reduction of Obtrusive Light,20202021 and any subsequent revisions.</p> <p>(https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obtrusive-light-2021/)</p>	<p>CE Response:</p> <p>The issue raised is noted and welcomed.</p> <p>Following a review of Section 13.9.3 (iii), an error in the date is typographical and should be replaced by the appropriate date provided in the submission.</p> <p>CE Recommendation:</p> <p>Amend Section 13.9.3 (iii) Lighting as follows:</p> <p>From:</p> <p>- Institute of Lighting Professionals (ILP) Guidance Note 1 The Reduction of Obtrusive Light, 2020</p> <p>To read:</p>

		Institute of Lighting Professionals (ILP) Guidance Note 1 The Reduction of Obtrusive Light,2021 and any subsequent revisions
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Non-Amendment Issue

The following issues refer to material or subject matter that was not included in either the 'Proposed Amendments' document or as the mapping of the proposed amendments that were placed on public display between 29th March and 26th April 2022. Consequently, and in accordance with Sections 12(7) to 12(10) of the Planning and Development Act 2000 (as amended) the following issues raised in submission(s) cannot be considered at this stage in the process and therefore do not result in any amendments to the Draft Plan.

Submission No.	Submission Summary	CE response and recommendation
SD-C226-2 Gary Mackin	The daa have no comment on the proposed Material Alterations to the Draft Development Plan 2022-2028 but recommend consultation with the IAA and the IAA-ANSP.	CE Response: The contents of this submission are noted. The requirement for consultation with prescribed bodies is set out under the Planning and Development Regulations 2000 (as amended). While the daa is a prescribed body the IAA is not. Nonetheless, the IAA was consulted at the Material Amendment stage of the draft plan and as part of the drafting of the section of the Plan on airports.
SD-C226-32 Department of Communications, Climate Action and Environment	Climate Action: While it is acknowledged that there is no material alteration relating to the Climate Action Plan the submission requests that the revised Climate Action Plan 2021 has been	CE Response: The request to update reference to the Climate Action Plan 2021 is noted.

	published and it is requested that the Draft Plan be updated to reflect same where required and possible.	
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Chapter 13 – Implementation and Monitoring

Chapter/Section	Section 13.1 Land-Use Zoning Objectives, Table 13.4
Amendment ref.	13.1, 13.2 and 13.3
Page No.	506
Policy/Objective no.	Amend Table 13.4, Amend Table 13.8 and Amend Table 13.10
Text/Policy/Objective Amendment Wording	
<p>Amendment 13.1, 13.2 and 13.3 amends table 13.4, 13.8 and 13.10 to move ‘Data Centres from ‘Open for Consideration’ to ‘Not permitted’.</p> <p>13.1 – Amend Table 13.4 Zoning Objective ‘REGEN’ from:</p> <p>Open for Consideration:</p> <p>Allotments, Bed & Breakfast, Betting Office, Boarding Kennels, Car Park, Crematorium, Cultural Use, Data Centre, Doctor/Dentist, Embassy, Funeral Home, Garden Centre, Guest House, Hospital, Industry-General, Nursing Home, Off-Licence, Place of Worship, Primary Health Care Centre, Public House, Recycling Facility, Retail Warehouse, Retirement Home, Service Garage, Shop-Neighbourhood, Social Club, Veterinary Surgery, Warehousing, Wholesale Outlet.</p> <p>To Read:</p> <p>Open for consideration:</p>	

Allotments, Bed & Breakfast, Betting Office, Boarding Kennels, Car Park, Crematorium, Cultural Use, ~~Data Centre~~, Doctor/Dentist, Embassy, Funeral Home, Garden Centre, Guest House, Hospital, Industry-General, Nursing Home, Off-Licence, Place of Worship, Primary Health Care Centre, Public House, Recycling Facility, Retail Warehouse, Retirement Home, Service Garage, Shop-Neighbourhood, Social Club, Veterinary Surgery, Warehousing, Wholesale Outlet.

Not Permitted:

Abattoir, Aerodrome/Airfield, Agriculture, Camp Site, Caravan Park-Residential, Cemetery, Concrete/Asphalt Plant in or adjacent to a Quarry, Conference Centre, ~~Data Centre~~, Fuel Depot, Heavy Vehicle Park, Industry-Extractive, Industry Special, Nightclub, Outdoor Entertainment Park, Refuse Landfill/Tip, Refuse Transfer Station, Rural Industry-Food, Scrap Yard, Shop-Major Sales Outlet, Transport Depot, Wind Farm.

13.2 – Amend Table 13.8 Zoning Objective ‘MRC’ from:

Open for Consideration:

Allotments, Crematorium, Cultural Use, Data Centre, Doctor/Dentist, Education, Health Centre, Hospital, Industry-Light, Nightclub, Offices 100 sq.m - 1,000 sq.m, Outdoor Entertainment Park, Place of Worship, Primary Health Care Centre, Social Club, Sports Club/Facility, Stadium, Transport Depot, Warehousing.

To Read:

Open for Consideration:

Allotments, Crematorium, Cultural Use, ~~Data Centre~~, Doctor/Dentist, Education, Health Centre, Hospital, Industry-Light, Nightclub, Offices 100 sq.m - 1,000 sq.m, Outdoor Entertainment Park, Place of Worship, Primary Health Care Centre, Social Club, Sports Club/Facility, Stadium, Transport Depot, Warehousing.

Not Permitted:

Abattoir, Aerodrome/Airfield, Agriculture, Bed & Breakfast, Boarding Kennels, Camp Site, Caravan Park-Residential, Cemetery, Community Centre, Concrete/Asphalt Plant in or adjacent to a Quarry, Conference Centre, [Data Centre](#), Embassy, Fuel Depot, Guest House, Heavy Vehicle Park, Home Based Economic Activities, Housing for Older People, Industry/Extractive, Industry-General, Industry-Special, Live-Work Units, Nursing Home, Office-Based Industry, Offices over 1,000 sq.m, Refuse Landfill/Tip, Refuse Transfer Station, Residential, Residential Institution, Retirement Home, Rural Industry-Food, Science and Technology Based Enterprise, Scrap Yard, Traveller Accommodation, Wind Farm, WorkLive Units.

13.3 – Amend Table 13.10 Zoning Objective ‘EE’ from:

Open for Consideration:

Agriculture, Allotments, Car Park, Childcare Facilities, Concrete/Asphalt Plant in or adjacent to a Quarry, [Data Centre](#), Garden Centre, Hotel/Hostel, Industry-Extractive, Motor Sales Outlet, Nightclub, Offices 100 sq.m - 1,000 sq.m, Offices over 1,000 sq.m, Public House, Refuse Landfill/Tip, Restaurant/Café, Retail Warehouse, Social Club, Sports Club/Facility, Stadium, Veterinary Surgery.

To Read:

Open for consideration:

Agriculture, Allotments, Car Park, Childcare Facilities, Concrete/Asphalt Plant in or adjacent to a Quarry, ~~[Data Centre](#)~~, Garden Centre, Hotel/Hostel, Industry-Extractive, Motor Sales Outlet, Nightclub, Offices 100 sq.m - 1,000 sq.m, Offices over 1,000 sq.m, Public House, Refuse Landfill/Tip, Restaurant/Café, Retail Warehouse, Social Club, Sports Club/Facility, Stadium, Veterinary Surgery.

Not Permitted:

Aerodrome/Airfield, Bed & Breakfast, Betting Office, Camp Site, Caravan Park-Residential, Cemetery, Community Centre, Conference Centre, Crematorium, Cultural Use, [Data Centre](#), Doctor/Dentist, Education, Embassy, Funeral Home, Guest House, Health Centre, Hospital, Housing for Older People, Live-Work

Units, Nursing Home, Off-Licence, Outdoor Entertainment Park, Place of Worship, Primary Health Care Centre, Recreational Facility, Residential, Residential Institution, Retirement Home, Rural Industry-Food, ShopMajor Sales Outlet, Shop-Neighbourhood, Wind Farm, Work-Live Units.

Submission No.	Submission Summary	CE response and recommendation
<p>SD-C226-16 Enterprise Ireland</p> <p>SD-C226-18 Vantage Data Centers</p> <p>SD-C226-22 South Dublin Chamber</p> <p>SD-C226-23 CyrusOne</p> <p>SD-C226-31 A&L Goodbody</p> <p>SD-C226-33 John Spain Associates</p> <p>SD-C226-34 John Spain Associates</p> <p>SD-C226-36 AWS EMEA SARL</p>	<p>Data Centre's (Amendment No. 13.1, 13.2, 13.3)</p> <p>The following amendments refer to the movement of Data Centres from 'Open for Consideration' to 'Not Permitted' within the EE, REGEN and MRC Zoning Objectives.</p> <p>The following submissions request that the proposed amendments 13.1, 13.2 and 13.3 are amended as follows:</p> <ul style="list-style-type: none"> • To amend Proposed Amendment 13.1 and Amend Table 13.4 Zoning Objective 'REGEN' so that 'Data Centre' is moved from being 'not permitted' to 'Open for Consideration'. • To amend Proposed Amendment 13.2 and Amend Table 13.8 Zoning Objective 'MRC' so that 'Data Centre' is moved from being 'not permitted' to 'Open for Consideration'. • To amend Proposed Amendment 13.3 and Amend Table 13.10 Zoning Objective 'EE' so that 'Data Centre' is moved from being 'not permitted' to 'Open for Consideration' <p>Each submission questions the amendment to Table 13.4, 13.8 and 13.10 in the plan, making the following points.</p>	<p>CE Response:</p> <p>Amendment 13.1, 13.2 and 13.3 amends table 13.4, 13.8 and 13.10 to move 'Data Centres from 'Open for Consideration' to 'Not permitted'.</p> <p>Data Centres play an important role in Ireland's economic landscape, allowing for the expanding use of technology. All submissions received highlight the importance of Data Centre development in Ireland, making the point that Amendment 13.1, 13.2 and 13,3 should be omitted from the Plan and revert back to the original Draft Plan statement.</p> <p>National Strategic Outcome 5 'Strong Economy Supported by Enterprise, Innovation and Skills' of the National Planning Framework (NPF) aims to create places that can foster enterprise and innovation and attract investment and talent. Delivering this outcome will require the coordination of growth and place making with investment in world class infrastructure, including digital connectivity. NSO 5 sets out the importance of digital and data innovation and indicates a number of objectives to achieve this including:</p>

<p>SD-C226-39 Equinix (Ireland) Ltd</p> <p>SD-C226-41 BCEI</p> <p>SD-C226-46 Interxion DAC Ireland</p> <p>SD-C226-55 American Chamber of Commerce Ireland</p> <p>SD-C226-59 John Spain Associates</p> <p>SD-C226-61 Cloud Infrastructure Ireland</p> <p>SD-C226-66 Richard Coughlan</p> <p>SD-C226-65 Office of the Planning Regulator</p>	<p>Conflicts with National and Regional Policy:</p> <ul style="list-style-type: none"> • A number of submissions highlighted that Data Centres play a role in Irelands Digital and Data innovation, relating directly to National Strategic Outcome 5 ‘Strong Economy Supported by Enterprise, Innovation and Skills’, which is underpinned by a range of objectives including ‘Promotion of Ireland as a sustainable destination for ICT infrastructure such as data centres and economic activities’. • A number of submissions have highlighted the EMRA RSES includes Regional Policy Objective (RPO) 8.25, which looks to ‘support the national objective to promote Ireland as a sustainable international destination for ICT infrastructure such as data centres and associated economic activities at appropriate locations’. • A number of submissions identify that Ireland’s Climate Action Plan 2019 laid a roadmap to reduce greenhouse emissions, with Action 20 stating, ‘Implement energy actions under the government Statement on the Role of data Centres in Ireland’s Enterprise Strategy to ensure that large demand connections are regionally balanced to minimise grid reinforcements’. • The submission highlights that the Government statement on the Role of Data Centres in Irelands 	<p><i>‘Promotion of Ireland as a sustainable international destination for ICT infrastructures such as data centres and associated economic activities.’</i></p> <p>The EMRA RSES indicates that the increasing use of digital technologies is impacting on every aspect of our lives and due to a fast moving and evolving infrastructure, the region will need to be able to respond and adapt to future communications networks and technology along with changing work practices and emerging economic models. RPO 8.25 on Communications Networks and Digital Infrastructure states:</p> <p><i>‘Support the national objective to promote Ireland as a sustainable international destination for ICT infrastructures such as data centres and associated economic activities at appropriate locations’</i></p> <p>Due to continued support for Data Centres within Government policy documents, an outright ban on their development within the county, which is effectively what the amendment would do, runs contrary to government policy at this time. In recognising that data centres and other industries have particular needs which, if left uncontrolled, could have undue negative environmental impacts, EDE7 Objective 2 of the Draft Plan contains strong policy and criteria which must be addressed by space extensive enterprises 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 and states:</p>
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	<p>Enterprise Strategy (2018) identified the strategic role that data centres play in achieving Irelands digital economy ambitions.</p> <ul style="list-style-type: none"> • One submission highlights that the decision by councillors to switch data centres from open for consideration to not permitted is contrary to Development Plan Guidelines (2007) and the Draft Development Plan guidelines (2021). • One submission raised the issue that the reasoning for moving Data Centres to 'Not permitted' was not valid, as there is currently no moratorium on Data Centres. <p>Economic Contribution:</p> <p>Each submission highlights the economic contributions of the sector to the growth of Irelands economy and Irish companies. The submissions highlight the benefits the data centre sector have brought to South Dublin, leading to innovations in operations of Data Centres and export of data centre services worldwide (Services and construction). The development of data centres has also lead to growth in FDI, particularly in terms of attracting multinationals within the Information and Communication Technology sector.</p> <p>Specialised Agencies:</p> <ul style="list-style-type: none"> • A number of submissions state that data centres are of fundamental national importance with specialised agencies (EirGrid, Irish Water), being tasked to manage and advise on their development, with 	<p>To require that space extensive enterprises demonstrate the following:</p> <ul style="list-style-type: none"> - The appropriateness of the site for the proposed use having regard to EDE7 Objective 1; - Strong energy efficiency measures to reduce their carbon footprint in support of national targets towards a net zero carbon economy, including renewable energy generation; - 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 in Ireland (PPA); - Sufficient capacity within the relevant water and, wastewater and electricity networks to accommodate the use proposed; - Measures to support the just transition to a circular economy; - Measures to facilitate district heating or heat networks where excess heat is produced; - A high-quality design approach to buildings which reduces the massing and visual impact; - A comprehensive understanding of employment once operational; - A comprehensive understanding of levels of traffic to and from the site at construction and operation stage; - Provide evidence of sign up to the Climate Neutral Data Centre Pact <p>The recommendation made in the CE Report on the Draft Plan consultation amends EDE7 Objective 2 to include that sufficient capacity is demonstrated in the electricity network by a prospective</p>
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	<p>decisions more effectively made through the lens of wider regional and national need.</p> <ul style="list-style-type: none"> • A number of submissions raise the point that no current policy either of EirGrid or the Government to restrict Data Centre development exists, instead a range of criteria which Eirgrid will consider in providing power and connections to data centres will be considered on their individual merit. The submission goes on to state that any proposed developments require a grid connection with EirGrid, which many operators have signed up too. <p>Community Investment:</p> <ul style="list-style-type: none"> • A number of submissions have highlighted benefits to the local community in South Dublin across community projects and non-profit organisations. <p>A number of submissions are accompanied by a legal opinion, setting out a legal case and statutory provisions of the need for the adopted South Dublin CDP to be consistent with the NPF and EMRA RSES, which has been considered as part of this submission.</p>	<p>developer and to ensure that power purchase agreements are those made in Ireland.</p> <p>It is noted that the addition made to EDE7 Objective 2 as set out above accords with the recent Policy Statement of Security of Electricity Supply issued by the government in November 2021 and which requires large energy users proposing to connect 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>Also, in November 2021 in conjunction with the above the Commission for the Regulation of Utilities issued a direction to the System Operators related to Data Centre grid connection. The direction provides criteria to EirGrid, ESB networks and other service providers on how to assess new applications for a connection to their respective transmission and distribution networks to ensure security of supply and combat constraint issues.</p> <p>In respect of a potential moratorium EirGrid echo the CRU position and do not adopt a moratorium but look to adopt 'Connection Measures' based on the criteria set out by the CRU. EirGrid are open to considering connections from Data Centres and will make an assessment based on the criteria set out by the CRU. It is the understanding of the Council and confirmed by Codema, the Dublin Energy Agency that there is no moratorium in place.</p> <p>As well as this, under Action 97 of the Climate Action Plan 2021, a 'review of the policy context for Large Energy Users (including Data Centres)' will take place, which will ensure alignment of enterprise</p>
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		<p>policy and wider regulatory environment with electricity emission targets and security of supply.</p> <p>EirGrid operate and manage the electricity grid so they are best placed to assess whether a Data Centre or any other large electricity user should be granted a grid connection. EirGrid's primary objectives are to ensure the grid operates well and to "Lead the island's electricity sector on sustainability and decarbonisation" and have all the relevant information to make a well-informed decision on connections to ensure "a safe, secure and reliable supply of electricity on the island of Ireland" as stated in their Group Strategy.</p> <p>This includes assessing any potential risks brought about by connecting large electricity users. EirGrid use a 2-stage engagement procedure before granting connections and the first of these occurs before the data centre applies for planning permission. As a result, EirGrid are best placed to decide on whether data centres should go ahead or not from an electricity supply perspective.</p> <p>The Draft Plan, through EDE7 Objective 2 sets a hierarchy of approaches to energy which must be demonstrated by space extensive development such as data centres. This means that relevant development must in the first instance <i>Maximise on site renewable energy generation to ensure as far as possible 100% powered by renewable energy</i>. Where 100% is not possible they must show evidence of a power purchase agreement made in Ireland. This is a direct agreement with a renewable electricity developer in Ireland.</p>
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		<p>The OPR have stated that due to ‘the absence of any strategic justification to support making data centres a ‘not permitted’ use across all zoning objectives, it is considered that the proposed changes to the zoning matrix in material alterations 13.1, 13.2 and 13.3 are not consistent with RPO 8.25.</p> <p>Given the complex issues surrounding this type of development, it is considered that the Draft Plan, which left data centres as an ‘open for consideration’ use, is the most appropriate, allowing for an assessment at planning application stage against the relevant objectives in the Plan. Such a categorisation also allows for assessment against the relevant government policy and any changes to that policy that may occur. Should the Members agree the Amendments, the Council may be in a position where the Development Plan contains an objective which does not accord with section 12(11) of the Planning and Development Acts which state:</p> <p>‘In making the development plan under <i>subsection (6) or (10)</i>, the members shall be 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’</p> <p>CE Recommendation:</p> <p>Omit Amendment 13.1, 13.2 and 13.3. and revert to ‘Open for Consideration’ in the Draft Plan</p>
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Chapter/ Section	Section 13.3.2 Green Infrastructure and Development Management
Amendment ref.	Amendment 13.5
Page no.	537
Policy/Objective No.	Section 13.3.2
Text/Policy/Objective Amendment Wording	
<p>Amend Section 13.3.2 Green Infrastructure and Development Management under ‘Greening Factor’</p> <p>From</p> <p>Greening Factor</p> <p>GI Proposals will be assessed against the policies and objectives contained within the Green Infrastructure Strategy set out in the County Development Plan and the Greening Factor outlined below:</p> <p>“An urban greening factor is a ratio between the amount of built area and non-built area within an urban area. The urban greening factor tool is used to assess and quantify the amount and quality of urban greening that a scheme provides”.</p> <p>An urban greening factor will be developed and applied during the lifetime of the Plan to all applications based on the submitted GI Infrastructure Plans and Landscape Plans. The urban greening factor will incorporate an appropriate scoring mechanism for greening urban areas based on best international practice and the unique GI features of the County.</p> <p>To</p>	

Green Space Factor (GSF)

The GSF is a score-based requirement that establishes minimum standards for landscaping and GI provision in new developments (See Table 1 in Green Space Factor Guidance Note). Minimum scoring requirements are based on the land-use zoning of a site (See GI5 Objective 4), this applies to all development comprising 2 or more residential units and any development with a floor area in excess of 500 sq.metres. Qualifying developments are required to reach the minimum Green Space Factor (GSF)score established by their land use zoning. Developers can improve their score by both retaining and enhancing existing landscape features and incorporating new features.

A developer will be required to specify the Green Space Factor (GSF) measure included within a proposed development as part of the submitted Green Infrastructure Plan and Landscape Plan. To facilitate the evaluation of the GSF score for a proposed development the Council will make available a Green Space Factor (GSF) Worksheet to applicants which will be required to be submitted with a qualifying planning application. A Green Space Factor (GSF) Guidance Note will also be made available on the Council's website under the Development Plan section setting out the applicable weightings and scorings. This will allow developers to calculate the overall site area and the surface areas of contributing to the Green Space Factor (GSF)s to see whether a proposed development achieves the required minimum score. Where applicable, a completed worksheet shall be submitted with the Green Infrastructure Plan and Landscape Plan in support of a proposed development.

Minimum Score Not Achieved

In cases where proposed development does not meet the minimum required score and the Council agree that the minimum score is not achievable on the site; the Council will engage with the applicant to help determine an alternative GI solution, to ensure that the proposed development does not detract from the local environment and makes a positive contribution to local GI provision. Where site-specific constraints do not allow for adequate landscaping features in line with minimum requirements (e.g. for infill development or certain brownfield sites) a developer will be permitted to provide alternative GI interventions or contributions to make up for this shortcoming, see below. Those GI measures ultimately chosen will be dictated by the site-specific context and will be subject to agreement with Council.

Sites with a Particular Sensitivity

Further, where a subject site is considered to be particularly sensitive or valuable from a GI perspective, developers will be required to engage with the Council to determine those GI interventions that will be required to ensure the environmental integrity of the site. This will primarily apply to sites located within or adjacent to primary and secondary GI corridors (see Figure 4.4). In such cases, specific consideration will be required to ensure that development does not fracture the existing GI network and preserves or enhances connectivity. Such sites may require the implementation of additional site-specific interventions to reflect their value.

Alternative GI Interventions

As indicated above, in cases where an applicant / developer faces particular difficulties in meeting the required minimum score due to site specific constraints, the Council will engage with the applicant to help determine an alternative GI solution to make up for any shortcoming. The following comprises a non-exhaustive list of interventions that developers can implement in order to enhance GI in the local area.

- The use of natural features such as woodlands, hedgerows, trees, water courses, ponds and grasslands or other natural methods to strengthen GI assets and provide connections to the wider GI network.
- The incorporation of nature-based solutions such as SuDS schemes, permeable paving, green and blue roofs, green walls, swales, SuDS tree pits, raingardens, ponds to support local biodiversity and mitigate potentially harmful effects of development.
- The provision of new native tree and plant species as well as pollinator friendly species within developments, consistent with National Pollinator Plan.
- Where possible, no net loss of existing trees/hedgerows on site.
- The provision of bird boxes (as building façades for nesting sparrows or swift bricks), bat boxes, hedgehog passes, and other wildlife interventions as required in landscape settings.
- The provision of bee bricks in new development.
- The retention of heritage features such as old walls, bridges etc. that have habitat value.
- The provision of allotments/orchards for residents to grow fruits and vegetables.
- Use of recycled/upcycled or locally sourced natural materials within the development.

- GI management/maintenance plans to be included as part of the landscape plans submitted for the Planning process. May include hedgerow/ tree and grassland management plans
- The provision of environmentally sensitive recreation and connectivity between GI areas. Those GI measures ultimately chosen will be dictated by the site-specific context and will be subject to agreement with the Council.

And

Delete section 13.3.3 Green Infrastructure Interventions and renumber remaining sections accordingly

Submission No.	Submission Summary	CE response and recommendation
SD-C226-26 South Dublin Conservation Society	The submission commends the amendments relating to Section 13.3.2 Green infrastructure and Development under Amendment 13.5 to retain, protect and enhance Green Infrastructure.	<p>CE Response:</p> <p>The contents of this submission are noted and welcomed.</p> <p>CE Recommendation:</p> <p>No Change to Amendment 13.5.</p>

Chapter/ Section	Section 13.5 Residential Development
Amendment ref.	Amendment 13.6
Page no.	552
Policy/Objective No.	Section 13.5.4
Text/Policy/Objective Amendment Wording	

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.

Submission No.	Submission Summary	CE response and recommendation
SD-C226-60 Tallaght Community Council	The submission refers to Amendment 13.6 in respect to Section 13.5 Residential Development and Backland Development and poses the question would this permit development in back gardens, close to other homes?	<p>CE Response:</p> <p>The submission is requesting clarity regarding Section 13.5 Residential and Backland Development but does not propose any changes to the amendment.</p> <p>The assessment of proposed development will be determined on a case-by-case basis and assessed by the Development Management</p>

		<p>Section of the Council. As part of the assessment of a planning application, proposed development will be assessed on the impact on privacy. The amendment sets out criteria which applications must follow to ensure levels of privacy are maintained. It is stated that reduced distances will be considered in respect of compact infill sites, however, the applicant would be required to submit a daylight availability analysis for a proposed development and detail appropriate design measures to reduce undue overlooking. The inclusion of the proposed wording outlines the criteria which must be met and ensures that privacy of existing residents is not unduly impacted upon.</p> <p>Regarding Backland Development, there is similar criteria outlined to ensure the applicant follows this in addition to the criteria for infill development. The question of permitting development in back gardens close to other homes would be assessed through individual applications received by the Council. Not all sites would be deemed suitable to accommodate infill or backland development for a number of reasons, which again will be site specific. If an application successfully demonstrates compliance with the criteria above, and accompanying material, then an application could be successful for development subject to meeting other relevant objectives in the Development Plan. As stated above, every application will be assessed individually at planning application stage.</p> <p>It is noted that the submission does not propose any further amendments to Amendment 13.6, and having regard to the above</p>
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		provisions, it is considered that the question raised is satisfactorily addressed in the Plan. CE Recommendation: No change to Amendment 13.6.
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Chapter/ Section	Section 13.8.3 Car Parking/Charging for Electric Vehicles (EVs)
Amendment ref.	Amendment 13.10
Page no.	582
Policy/Objective No.	Amend Section 13.8.3 Car Parking and Electric Vehicles (EV's)
Text/Policy/Objective Amendment Wording	
<p>Amend the first bullet point in Section 13.8.3 Car Parking and Electric Vehicles (EV's)</p> <p>From:</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>To:</p>	

EV charging shall be provided in all new residential, mixed use and commercial development and shall comprise ~~15%–20%~~ **a minimum of 20%** of the total parking spaces provided (or as may be further required by legislation), with higher provision within this range required in urban areas, with the remainder of spaces to be future proofed. And amend the second bullet Point

From:

The remainder of the parking spaces should be constructed to be capable of accommodating future charging points, as required.

To:

The remainder of the parking spaces should be constructed to be capable of accommodating future charging points., ~~as required.~~

Submission No.	Submission Summary	CE response and recommendation
<p>SD-C226-35 Electricity Supply Board</p> <p>SD-C226-6 National Transport Authority</p>	<p>The submission welcomes the opportunity to comment on the Plan.</p> <p>The submission welcomes the replacement of 15-% - 20% of total car parking spaces to a minimum of 20% of EV parking spaces which reads:</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 legislation), with higher provision within this range required in urban areas, with the remainder of spaces to be future proofed.'</p> <p>The submission also emphasises that the provision of electric vehicle infrastructure intended as part of this amendment is in line with the standards set out in Statutory</p>	<p>CE Response:</p> <p>The support for Material Amendment 13.10 is noted and welcomed.</p> <p>CE Recommendation:</p> <p>No change to Amendment 13.10.</p>

	<p>Instrument No. 393/2021 – European Union (energy Performance of Buildings) Regulations 2021.</p> <p>In addition,the NTA has reviewed the proposed Material Amendments to the Draft South Dublin County Development Plan 2022-2028 having regard to the Transport Strategy for the Greater Dublin Area 2016-2035 and the recently issued Draft Transport Strategy for the Greater Dublin Area 2022-2042.</p> <p>The submission acknowledges the inclusion of the recommendations made following comments on the 15th September 2021 and is supportive of the proposed Material Amendment 13.10.</p>	
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Chapter/ Section	Section 13.9.3 Environmental Hazard Management (iii) Lighting
Amendment ref.	Amendment 13.11
Page no.	590
Policy/Objective No.	Amend Section 13.8.3
Text/Policy/Objective Amendment Wording	

Omit

(iii) Lighting

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 set out below should be considered.

Note: with accompanying table **Table 13.28: Environmental Zones for Lighting.**

Table 13.28: Environmental Zones for Lighting

Zone	Surroundings	Lighting Environment	Examples
E1	Natural	Intrinsically Dark	Natural Parks
E2	Rural	Low District Brightness	Rural, Small Village, Relatively dark urban locations
E3	Suburban	Medium District Brightness	Small towns centres or urban locations
E4	Urban	High District Brightness	Town/City Centres with high levels of night-time amenity

Development proposals that include external lighting should include details of the external lighting scheme.

Implementation and Monitoring (IM)

~~-Lighting should be designed to avoid light spillage, the creation of glare or the emission of light above a horizontal plane.~~

~~-External lighting schemes and illuminated signage on commercial and industrial premises, sports grounds, and other community facilities, should be designed, installed and operated so as to prevent nuisance to adjoining occupiers and road users, in the interests of amenity and public safety. A **Lighting Plan** may be may be required for developments in sensitive locations.~~

AMEND by inserting the following:

13.9.3(iii) Lighting (page 590)

Co-ordination of Landscape Proposals and Public Lighting (and other utilities)

The co-ordination of proposed Landscape Plans and Public Lighting Plans (and other utilities) to include Environmental Zones, where applicable, 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 practical, viable and compatible.

All residential developments above 5 residential units and all other proposed developments shall submit a full lighting plan. This shall be a co-ordinated plan showing the proposed landscape plan, public lighting and other services and any environmental/ecological related requirements and that these are prepared in accordance with industry best practice and in compliance with:

- The most up to date edition of EN13201
- Institute of Lighting Professionals (ILP) Guidance Note 1 The Reduction of Obtrusive Light, 2020
- Relevant documents of the Society of Light and Lighting
- South Dublin County Council's Public Lighting Specification, 2016, (as updated),

Lighting should be designed to minimise light pollution and should be designed to avoid light spillage, the creation of glare or the emission of light above a horizontal plane.

External lighting schemes and illuminated signage on commercial and industrial premises, sports grounds, and other community facilities, should be designed, installed and operated so as to prevent nuisance to adjoining occupiers and road users, in the interests of amenity and public safety.

Where sites are environmentally sensitive, a lighting plan for Environmental Zones will be required.

Environmental Zones for Lighting Plan

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,

The proposals 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.

The proposals should provide for 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 and so on.

Where applicable, the provisions of the ***“Institute of Lighting Professionals”*** Guidance Document Note. 8 Bats and Artificial Lighting, 2018, shall be applied:

- *Bat sensitive lighting installations to be managed/mitigated by dynamic lighting systems. Warm White (2,700K) lanterns may be used in designated bat sensitive areas only. In assessing planning applications or preparing plans, the avoidance and mitigation measures as outlined in the Guidance Document Note 8, referred to above, are advised to be incorporated at the earliest stage of development and lighting designs.*

- In general, non-vehicular routes through green spaces should be lit only if they are permeability routes, outside designated dark zones and lighting is agreed with the public realm section as well as the public lighting section of the Council. The above is subject to assessment regarding the sensitivity of ecology in the area.*

Submission No.	Submission Summary	CE response and recommendation
SD-C226-26 South Dublin Conservation Society	<p>The submission recommends the following date change from 2020 to 2021 to Amendment 13.11:</p> <p>Institute of Lighting Professionals (ILP) Guidance Note 1 The Reduction of Obtrusive Light, 2020 2021 and any subsequent revisions.</p> <p>(https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obtrusive-light-2021/)</p>	<p>CE Response:</p> <p>The submission refers to Amendment 13.11 which concerns Section 13.9.3(iii) Lighting in the Development Plan. The submission is requesting changing the date of the Institute of Lighting Professionals (ILP) Guidance Note 1 as follows:</p> <p>From:</p> <ul style="list-style-type: none"> Institute of Lighting Professionals (ILP) Guidance Note 1 The Reduction of Obtrusive Light, 2020. <p>To:</p> <ul style="list-style-type: none"> Institute of Lighting Professionals (ILP) Guidance Note 1 The Reduction of Obtrusive Light, 2021 and any subsequent revisions. <p>The error in the date is considered to be a typo and minor in nature, and in the interests of referring to the most up to date Publication, it is proposed that the date of 2020 be amended to read 2021.</p>

		<p>CE Recommendation:</p> <p>Minor modification to Amendment 13.11 to read:</p> <ul style="list-style-type: none"> Institute of Lighting Professionals (ILP) Guidance Note 1 The Reduction of Obtrusive Light, 2021 and any subsequent revisions
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Chapter/ Section	Section 13.8.2 Car Parking Standards:
Amendment ref.	Amendment 13.14
Page no.	579
Policy/Objective No.	Amend Sections 13.8.2 Car parking Standards
Text/Policy/Objective Amendment Wording	
<p>Amend Section 13.8.2 Car Parking Standards:</p> <p>From:</p> <p>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).</p> <p>To:</p>	

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 800 metres of a train or Luas station and within 400-500 metres of a high quality bus service (including proposed services that have proceeded to construction).

And from:

Zone 2 (Residential): More restrictive rates for application within town and village centres, within 400 metres of a high quality public transport service (includes a train station, Luas station or bus stop with a high quality service).

To:

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 400- 500 metres of a high quality public transport service (includes a train station, Luas station or bus stop with a high quality service).

Submission No.	Submission Summary	CE response and recommendation
SD-C226-60 Tallaght Community Council	The submission refers to Amendment 13.14 in respect to Section 13.8.2 Car Parking Standards and poses the following questions: Is the net effect of these changes insisting on more or less parking to be provided? Given the high level of REGEN lands in Tallaght, is this of interest to Tallaght?	<p>CE Response:</p> <p>The submission does not outline any proposed changes to the Amendment but is requesting an understanding of Section 13.8.2 Car Parking Standards under Amendment 13.14.</p> <p>The car parking standards are based on 'zones' which allows for the recognition that development in certain locations, where it is in proximity to public transport, will not be required to provide the same level of car parking as areas which are further removed from public transport. The revised distances are to ensure that the Development</p>

		<p>Plan accords with the standards set out in the Sustainable Urban Housing Guidelines – Design Standards for New Apartments. The standards apply to Tallaght in the same way as they apply to any other location in the County and planning applications will be assessed against the criteria set out.</p> <p>CE Recommendation:</p> <p>No change to Amendment 13.14.</p>
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Environmental Reports

SFRA		
Submission No.	Submission Summary	CE response and recommendation
SD-C226-10 Office of Public Works	<p>Justification Test</p> <p>The submission is made specifically concerning flood risk and the application of the Guidelines on the Planning System and Flood Risk Management (DECLG/OPW, 2009), hereafter referred to as the 'Guidelines'.</p> <p>The submission welcomes the following:</p> <ul style="list-style-type: none"> • The addition of IE3 Objective 8 regarding the integration of surface and groundwater systems. • The addition of a flood zone map overlaid on the land use zoning mapping. • The clarification of IE4 Objective 3 to refer to the Flood Risk Management Plan. • The clarification of IE4 Objective 4 to ensure that zoning or development proposals support and do not impede flood relief works. <p>The submission notes that while the additional Plan Making Justification Tests included at Material Alteration stage are welcomed, the Justification Tests provided cover areas rather than specific zonings and not all criteria in part 2 have been satisfied. It is pointed out that all criteria of the Justification Test must be satisfied for a zoning to be justified. The submission sets out specific requirements to which it is considered should be incorporated into the plan and supported by relevant policy objectives. The requirements include:</p>	<p>CE Response:</p> <p>The welcoming of Amendments 11.3, 11.5, 11.6 and Amendment SFRA 1 is noted.</p> <p>It is recognised that the application of the Justification Test should be used to incorporate flood risk successfully and transparently into the decision-making process on development plans and enabling town centre and minor infill developments to proceed. The SFRA provides more detailed information on the spatial distribution of flood risk to enable adoption of the sequential approach and to identify where it will be necessary to apply the Justification Test.</p> <p>The Justification tests have been presented in geographical areas to increase legibility for the general public. With each geographical area, a summary of the zonings within the area is described. The subsequent Justification Test is based on these specific zonings and that the comments raised in the OPW's submission have been addressed through the way described.</p> <p>The suggestion to incorporate the specific policies outlined into the Plan are noted but due to the stage in the plan making process it is not possible at this time. However, it is noted that the Draft Plan includes objectives to implement the Flood Risk Guidelines and that this objective would cover the intent of the objectives outlined.</p> <p>CE Recommendation:</p> <p>No change to Amendment SFRA Justification Test.</p>

	<ul style="list-style-type: none"> • Development in Flood Zone A should consist of water compatible development only; • Highly vulnerable development shall not be permitted in Flood Zones A or B; and • Existing open spaces and water compatible uses in Flood Zones A and B should be retained to maintain flood storage areas. 	
SD-C226-10 Office of Public Works	The submission also makes specific reference to previous comments made by the Office of Public Works (OPW) to the Draft Plan on undeveloped lands zoned highly vulnerable New Residential south of Bianconi Avenue. It is highlighted that the lands have retained their zoning, but have not been assessed against the criteria of the Plan Making Justification Test.	<p>CE Response:</p> <p>As the lands at Bianconi Avenue are already subject to development with the remaining area having received planning permission under the SHD process they were assessed under the justification test for “Existing, developed, High Vulnerability Zonings Flooding”.</p> <p>As per the justification test the sequential approach should be applied through site planning and should avoid encroachment onto, or loss of, the flood plain.</p> <p>Having regard to the development status of the lands at Bianconi Avenue and their long-standing zoning in an area identified in the MASP for strategic development, it is considered that they have been assessed for flood risk appropriately within the SFRA justification test for the Draft Plan.</p> <p>CE Recommendation:</p> <p>No change to Amendment SFRA Justification Test.</p>

Strategic Environmental Assessment		
Submission No.	Submission Summary	CE response and recommendation
SD-C226-26 South Dublin Conservation Society SD-C226-5 Environmental Protection Agency (EPA)	Environmental Assessment One submission commends the environmental assessment of the Plan and carried out by SDCC’s consultants Brady Shipman Martin.	CE Response: The council welcomes comments on the Strategic Environmental Assessment.

	<p>The submission notes that the SEA assessment of the various material amendments indicates several ‘uncertain’ or ‘potentially negative’ environment effects requiring mitigation measures which may or may not work. In such instances it is requested that SDCC adhere to the recommendations of the consultants and not incorporate into the Plan any material amendments that will impact negatively on the natural and built environment.</p> <p>The EPA comments on the proposed Material Alterations to the Draft Development Plan 2022-2028 by noting the guidance document ‘<i>SEA of Local Authority Land Use Plans – EPA Recommendations and Resources</i>’ for setting out key recommendations for integrating environmental considerations into Local Authority land-use plans. This document is noted and considered as appropriate and relevant to the Alterations.</p> <p>The submission highlights the importance when proposing alterations that the Plan is consistent with the need for proper planning and sustainable development. In considering the alterations, South Dublin should consider the need to align with national commitments on climate change mitigation and adaptation, as well as incorporating any relevant recommendation in sectoral, regional and local climate adaptation plans.</p> <p>The submission also comments on future changes to the Draft Plan should be screened for likely significant effects in accordance with SEA regulations.</p> <p>The submission also comments on the stages once the South Dublin County Development Plan is adopted, the preparation of an SEA Statement must begin. Also recommend consultation with the relevant Environmental Authorities.</p>	<p>Article 8 of the SEA Directive requires that the Environmental Report, the opinions expressed by the environmental authorities and the public, and the outcome of any transboundary consultation, must be taken into account during the preparation of the plan or programme and before its adoption.</p> <p>All policies and objectives contained in the Draft Plan have been assessed and all future amendments to the Plan for likely significant effects, will use the same method of assessment applied in the environmental assessment for this stage of the plan.</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>CE Recommendation:</p> <p>No change to SEA.</p>
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List of Submitters and types of submitters with assigned reference numbers

Reference	Author	Type
SD-C226-1	Proinsias Mac Fhlannchadha	Individual
SD-C226-2	Gary Mackin	Individual
SD-C226-3	Rathcoole Community Council	Organisation
SD-C226-4	Rathcoole Community Council	Organisation
SD-C226-5	Environmental Protection Agency (EPA)	Organisation
SD-C226-6	National Transport Authority	Organisation
SD-C226-7	Laura Duez	Individual
SD-C226-8	Moffash ULC	Individual
SD-C226-9	HARVEY	Organisation
SD-C226-10	Office of Public Works	Organisation
SD-C226-11	Greenogue Management	Organisation
SD-C226-12	Francesco Perrone	Individual
SD-C226-13	Samuela Finn	Individual
SD-C226-14	Ne Graver	Individual
SD-C226-15	Ne Graver	Individual
SD-C226-16	Enterprise Ireland	Organisation
SD-C226-17	Litter Mugs	Organisation
SD-C226-18	Vantage Data Centres	Organisation
SD-C226-19	Jones Lang LaSalle	Organisation
SD-C226-20	EirGrid plc	Organisation
SD-C226-21	Irish Water	Organisation
SD-C226-22	South Dublin Chamber	Organisation
SD-C226-23	CyrusOne	Organisation
SD-C226-24	Lucan Golf Club	Organisation
SD-C226-25	Saggart Village Residents' Association	Organisation
SD-C226-26	South Dublin Conservation Society	Organisation
SD-C226-27	CAIRN Plc	Individual
SD-C226-28	CAIRN Plc	Individual

SD-C226-29	Four Districts Woodland Habitat Group	Organisation
SD-C226-30	Four Districts Woodland Habitat Group	Organisation
SD-C226-31	A&L Goodbody	Organisation
SD-C226-32	Department of Communications, Climate Action and Environment	Organisation
SD-C226-33	John Spain Associates	Individual
SD-C226-34	John Spain Associates	Individual
SD-C226-35	Electricity Supply Board	Organisation
SD-C226-36	AWS EMEA SARL	Organisation
SD-C226-37	Land Development Agency	Organisation
SD-C226-38	Deputy Emer Higgins	Individual
SD-C226-39	Equinix (Ireland) Ltd	Organisation
SD-C226-40	Cllr Trevor Gilligan PC	Staff member
SD-C226-41	BCEI	Organisation
SD-C226-42	Sally Graver	Individual
SD-C226-43	Transport Infrastructure Ireland	Organisation
SD-C226-44	John O'Leary	Individual
SD-C226-45	Beauparc	Organisation
SD-C226-46	Interxion DAC Ireland	Organisation
SD-C226-47	Tallaght Community Council	Organisation
SD-C226-48	Tallaght Community Council	Organisation
SD-C226-49	Tallaght Community Council	Organisation
SD-C226-50	Development Applications Unit	Organisation
SD-C226-51	Tallaght Community Council	Organisation
SD-C226-52	Four Districts Woodland Habitat Group	Organisation
SD-C226-53	John Spain Associates	Individual
SD-C226-54	Tallaght Community Council	Organisation
SD-C226-55	American Chamber of Commerce Ireland	Organisation
SD-C226-56	Niall Healy	Individual
SD-C226-57	Niall Healy	Individual
SD-C226-58	Tallaght Community Council	Organisation
SD-C226-59	John Spain Associates	Individual
SD-C226-60	Tallaght Community Council	Organisation

SD-C226-61	Cloud Infrastructure Ireland	Organisation
SD-C226-62	Tallaght Community Council	Organisation
SD-C226-63	Department of Education & Skills	Organisation
SD-C226-64	Tallaght Community Council	Organisation
SD-C226-65	Office of the Planning Regulator	Organisation
SD-C226-66	Richard Coughlan	Individual
SD-C226-67	TCC	Organisation
SD-C226-68	TCC	Organisation
SD-C226-69	Aidan Lawlor	Individual
SD-C226-70	TCC	Organisation
SD-C226-71	Eugene McElhinney	Individual
SD-C226-72	Eugene McElhinney	Individual
SD-C226-73	Orla Daly	Individual
SD-C226-74	Alice Magee	Individual
SD-C226-75	Alice Magee	Individual
SD-C226-76	Katie Goodwin	Individual
SD-C226-77	Con Mc Carthy	Individual
SD-C226-78	Nessa Darcy	Individual
SD-C226-79	Belgard Area Residents Association	Organisation
SD-C226-80	Cllr Vicki Casserly	Staff member
SD-C226-81	Shay Nolan	Individual
SD-C226-82	Alistair Mullan	Individual
SD-C226-83	Future Of Dublin	Individual
SD-C226-84	Department of Transport	Organisation

SECTION 3 – Supplementary Documents

Part 1 Environmental Assessments of Recommended Minor Modifications to Proposed Amendments

Assessment of the Chief Executive's Recommended Changes included in the CE Report to the Material Amendments to the Draft Plan

It should be noted as part of the SEA / AA and SFRA Assessment of any recommended minor modifications to the Proposed Amendments, all modifications to the amendments have also been reviewed by the Strategic Flood Risk Assessment consultants, with no SFRA issues identified.

All Proposed Amendments were assessed prior to public consultation and the following only relate to where modifications have been recommended to those proposed amendments.

Where this assessment references an amendment in the body of the Chief Executive's response and recommendation, the proposed amendment is shown as per the amendment as displayed on the online Portal as part of the Public Consultation. For example, the original Amendment showed text additions to the Plan set out in **green type**, deletions to the text shown in ~~red print with a strikethrough~~. Where this assessment makes a recommendation for a further modification, which is minor in nature, this is shown in the recommendation section in **black bold** (for insertions) or ~~**bold strikethrough**~~ (for text omissions).

Office of the Planning Regulator:

Ref. Number	Amendment/Policy/ Objective No.	Policy/Objective Amendment Wording	Environmental Assessments
SD-C226-65 Office of the Planning Regulator	Observation 1, Section 2.7.2b	A minor modification to the text under section 2.7.2b as follows: From: The Saggart settlement had a population in 2016 of 3,133 which is targeted to grow by 366 454 persons (11%) (13%) to 3,499 3,587 persons by 2028. Taking this growth over the plan period alongside estimated growth between 2017 and Q3 2022 of 244 people this equates to an overall growth of 698 (22%) persons over the period 2017 to 2028 To: The Saggart settlement had a population in 2016 of 3,133 which is targeted to grow by 366 454 persons	SEA Assessment: Amendment provides for clarification and update. No potential environmental effects arise. SEA not required. AA Assessment: This amendment does not result in potential for any significant negative effects on European sites.
		(11%) (13 14%) to 3,499 3,587 persons by 2028. Taking this growth over the plan period alongside estimated growth between 2017 and Q3 2022 of 244 people this equates to an overall growth of 698 (22%) persons over the period 2017 to 2028	
SD-C226-65 Office of the Planning Regulator	Observation 2, Table 11 Core Strategy	A minor modification to Table 11 Core Strategy to include a footnote to the bottom of the table which details the following: <i>*Note the density figures set out in table 11 provide for an average density of 40-50 units per hectare within Dublin City and Suburbs and a density of 30-35 units per hectare outside of the City and Suburbs.</i>	SEA Assessment: Amendment provides for clarification. No potential environmental effects arise. SEA not required. AA Assessment: This amendment does not result in potential for any significant negative effects on European sites.
SD-C226-65 Office of the Planning Regulator	Observation 3, Amendment 7.21	Minor modification to Material Amendment 7.21 as follows: Description: New Road from the N7 to the N4	SEA Assessment: Amendment provides for clarification. No potential environmental effects arise. SEA not required.

	<p>Leixlip Interchange with a potential extension to the N81.</p> <p>Function: New Road to link between the N7 and the N4 Leixlip Interchange to include provision for sustainable transport modes along its length, the function of this route would be primarily to provide resilience to the M50. There is further potential for a further the extension of this route from the N7 to the N81 with a route by-pass function around Rathcoole and Saggart, recognising that this may also provide additional resilience to peripheral roads within the county in particular between the N7 and N4. Further connections and possible alternative routes will</p>	<p>AA Assessment: This amendment does not result in potential for any significant negative effects on European sites.</p>
	<p>be determined through the review of the NTA's GDA Strategy and in consultation with TII and relevant local authorities. Development of these routes will be aligned with the NTAs GDA Transport Strategy. Delivery will be 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 alluvial woodlands at Rathcoole, 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>	

Chapter 1: Introduction, Strategic Vision and Climate Change

Ref. Number	Amendment/Policy/Objective No.	Policy/Objective Amendment Wording	Environmental Assessments
N/A	N/A	N/A	N/A

Chapter 2: Core Strategy and Settlement Strategy

Ref. Number	Amendment/Policy/Objective No.	Policy/Objective Amendment Wording	Environmental Assessments
SD-C226-4 Rathcoole Community Council	Amendment 2.11, CS8 SLO1	Minor modification to Amendment 2.11 to remove the wording 'Phase 1' to read as follows: CS8 SLO1: To facilitate the delivery of Phase 1 residential lands at Mill Road Saggart which fully	SEA Assessment: Amendment provides for clarification. No potential environmental effects arise. SEA not required. AA Assessment:
SD-C226-40 Cllr Trevor Gilligan PC SD-C226-25 Saggart Village Residents' Association		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.	This amendment does not result in potential for any significant negative effects on European sites.

SD-C226-28 CAIRN Plc	Amendment 2.12, CS9 SLO3	Minor Modification to Material Amendment 2.12 (CS9 SLO3) as follows: 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) to the satisfaction of the Planning Authority , 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.	SEA Assessment: Amendment provides for clarification. No potential environmental effects arise. SEA not required. AA Assessment: This amendment does not result in potential for any significant negative effects on European sites.
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Chapter 3: Natural, Cultural and Built Heritage

Ref. Number	Amendment/Policy/Objective No.	Policy/Objective Amendment Wording	Environmental Assessments
SD-C226-3 Rathcoole Community Council	Amendment no. 3.14, Section 3.5.2, NCBH19: Protected Structures to add a new SLO	<p>CE Recommendation: Minor modification to Amendment 3.14 as follows:</p> <ol style="list-style-type: none"> Amend NCBH19 SLO 7 wording to include the following text [black bold] as follows: To protect Glebe House RPS Ref. 313 (Former Mary Mercer Trust Charter School for girls), Rathcoole. Amend the description column attached to Protected Structure Ref 313 contained within Appendix 3A Record of Protected Structures as follows [insertions in bold]: Glebe House (Former Mary Mercer Trust Charter School for girls). 	<p>SEA Assessment: Amendment provides for clarification. No potential environmental effects arise. SEA not required.</p> <p>AA Assessment: This amendment does not result in potential for any significant negative effects on European sites.</p>

Chapter 4: Green Infrastructure

Ref. Number	Amendment/Policy/Objective No.	Policy/Objective Amendment Wording	Environmental Assessments
N/A	N/A	N/A	N/A

Chapter 5: Quality Design and Healthy Placemaking

Ref. Number	Amendment/Policy/ Objective No.	Policy/Objective Amendment Wording	Environmental Assessments
SD-C226-25 Saggart Village Residents' Association SD-C226-40 Cllr Trevor Gilligan PC SD-C226-6 National Transport Authority SD-C226-43 Transport Infrastructure Ireland	Amendment 5.11, QDP14 Objective 6	<p>CE Recommendation:</p> <p>Minor modification to Amendment 5.11 such that Objective QDP14 Objective 6 would read as follows:</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. The Local Transport Plan / Local Area Plan should have regard to the NTA and TII Guidance Note on Area Based transportation Assessments 2018 or any subsequent updates thereof, and will be subject to screening for AA and SEA.</i></p>	<p>SEA Assessment: Amendment provides for clarification. No potential environmental effects arise. SEA not required.</p> <p>AA Assessment: This amendment does not result in potential for any significant negative effects on European sites.</p>

Chapter 6: Housing

Ref. Number	Amendment/Policy/ Objective No.	Policy/Objective Amendment Wording	Environmental Assessments
N/A	N/A	N/A	N/A

Chapter 7: Sustainable Movement

Ref. Number	Amendment/Policy/ Objective No.	Policy/Objective Amendment Wording	Environmental Assessments
SD-C226-43 Transport	Amendment 7.17, SM3 Objective 26	Minor modification to Amendment 7.17 to read as follows:	SEA Assessment: Amendment provides for clarification. No potential environmental effects arise. SEA not required.
Infrastructure Ireland		To ensure planning applications adjacent to the Luas, which have the potential to impact on light rail infrastructure have regard to TII's Light Rail Environment – Technical Guidelines for Development and that developments arising are carried out in accordance with Transport Infrastructure Ireland's 'Code of Engineering Practice' as may be amended.'	AA Assessment: This amendment does not result in potential for any significant negative effects on European sites. SFRA Assessment:
SD-C226-6 National Transport Authority SD-C226-24 Lucan Golf Club SD-C226-25 Saggart Village Residents' Association SD-C226-38 Deputy Emer Higgins SD-C226-40 Cllr Trevor Gilligan PC SD-C226-43 Transport Infrastructure	Amendment 7.21	Minor modification to Material Amendment 7.21 as follows: Description: New Road from the N7 to the N4 Leixlip Interchange with a potential extension to the N81. Function: New Road to link between the N7 and the N4 Leixlip Interchange to include provision for sustainable transport modes along its length , the function of this route would be primarily to provide resilience to the M50. There is further potential for a further the extension of this route from the N7 to the N81 with a route by-pass function around Rathcoole and Saggart , recognising that this may also provide additional resilience to peripheral roads within the county. in particular between the N7 and N4. 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	SEA Assessment: Amendment provides for clarification. No potential environmental effects arise. SEA not required. AA Assessment: This amendment does not result in potential for any significant negative effects on European sites.

Ireland SD-C226-50 Development		
Applications Unit		<p>authorities. Development of these routes will be aligned with the NTAs GDA Transport Strategy. Delivery will be 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 alluvial woodlands at Rathcoole, 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>

Chapter 8: Community Infrastructure and Open Space

Ref. Number	Amendment/Policy/Objective No.	Policy/Objective Amendment Wording	Environmental Assessments
N/A	N/A	N/A	N/A

Chapter 9: Economic Development and Employment

Ref. Number	Amendment/Policy/ Objective No.	Policy/Objective Amendment Wording	Environmental Assessments
SD-C226-1 Proinsias Mac Fhlannchadha	Amendment 9.1,	<p>CE Recommendation: Minor modification to Amendment 9.1 to amend the last sentence in the second paragraph of section 9.0.1 as follows:</p> <p>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 Tallaght and Naas Road City Edge / City Edge Strategic Framework area.</p>	<p>SEA Assessment: Amendment provides for clarification. No potential environmental effects arise. SEA not required.</p> <p>AA Assessment: This amendment does not result in potential for any significant negative effects on European sites.</p>

Chapter 10: Energy

Ref. Number	Amendment/Policy/ Objective No.	Policy/Objective Amendment Wording	Environmental Assessments
SD-C226-32 Department of Communications, Climate Action and Environment	Amendment 10.1, Policy E9	<p>CE Recommendation: Minor modification to Amendment 10.1 as follows:</p> <p>From: <i>Encourage small and medium scale wind energy developments within industrial or business parks and support small community-based proposals for domestic use in urban areas and feedback of surplus to the grid, provided they do not negatively impact upon the environmental quality and visual or residential amenities of the area.</i></p> <p>To: <i>'Encourage small and medium scale wind energy developments within industrial or business parks and support small community-based proposals for domestic use in urban areas areas and feedback of surplus to the grid that can encourage self-consumption on a community scale whilst feeding any surplus back to the grid, provided they do not negatively impact upon the environmental quality and visual or residential amenities of the area.'</i></p>	<p>SEA Assessment: Amendment provides for clarification. No potential environmental effects arise. SEA not required.</p> <p>AA Assessment: This amendment does not result in potential for any significant negative effects on European sites.</p>

Chapter 11: Infrastructure and Environmental Services

Ref. Number	Amendment/Policy/ Objective No.	Policy/Objective Amendment Wording	Environmental Assessments
SD-C226-26 South Dublin Conservation Society	Amendment 11.14, Section 13.9.3 (iii)	CE Recommendation: Amend Section 13.9.3 (iii) Lighting as follows: From: - Institute of Lighting Professionals (ILP) Guidance Note 1 The Reduction of Obtrusive Light, 2020 To read: Institute of Lighting Professionals (ILP) Guidance Note 1 The Reduction of Obtrusive Light, 2021 and any subsequent revisions	SEA Assessment: Amendment provides for clarification. No potential environmental effects arise. SEA not required. AA Assessment: This amendment does not result in potential for any significant negative effects on European sites.

Chapter 12: Our Neighbourhoods

Ref. Number	Amendment/Policy/ Objective No.	Policy/Objective Amendment Wording	Environmental Assessments
N/A	N/A	N/A	N/A

Chapter 13: Implementation and Monitoring

Ref. Number	Amendment/Policy/ Objective No.	Policy/Objective Amendment Wording	Environmental Assessments
N/A	N/A	N/A	N/A

Environmental Reports:

Ref. Number	Amendment/Policy/ Objective No.	Policy/Objective Amendment Wording	Environmental Assessments
N/A	N/A	N/A	N/A

Part 2 Material Amendment Maps

Material Amendments Maps for reference purposes.

Chapter 2 - Core Strategy and Settlement Strategy Material Amendment Associated Maps

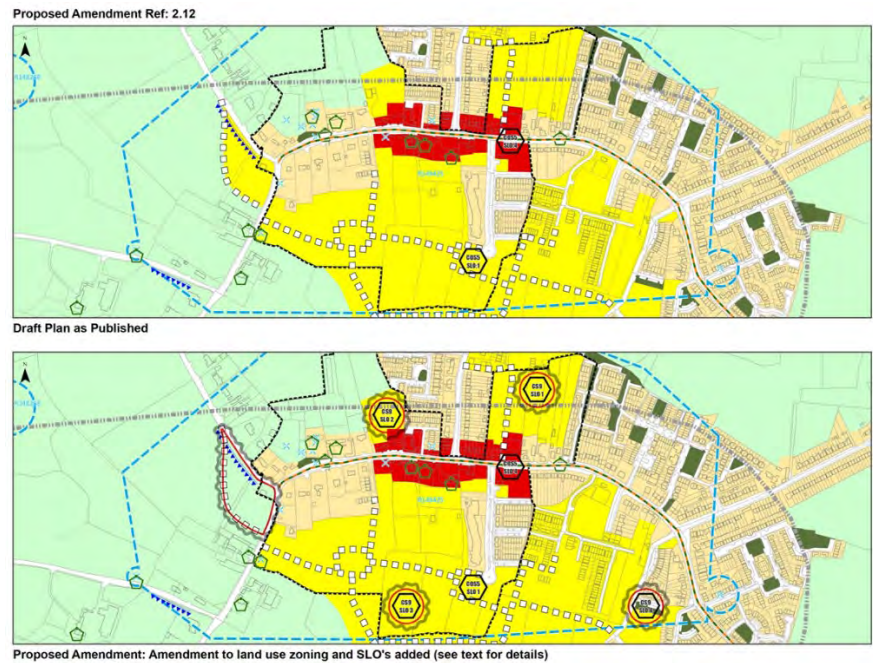
Chapter/ Section	Section 2.7.2 Self-Sustaining Growth Towns / Self-Sustaining Town - Saggart
Amendment ref.	Amendment 2.11
Page no.	71
Policy/Objective No.	New CS8 SLO 1 - 2.7.2 Self-Sustaining Growth Towns / Self-Sustaining Town And Amend Map No. 8

Associated Mapping Amendment



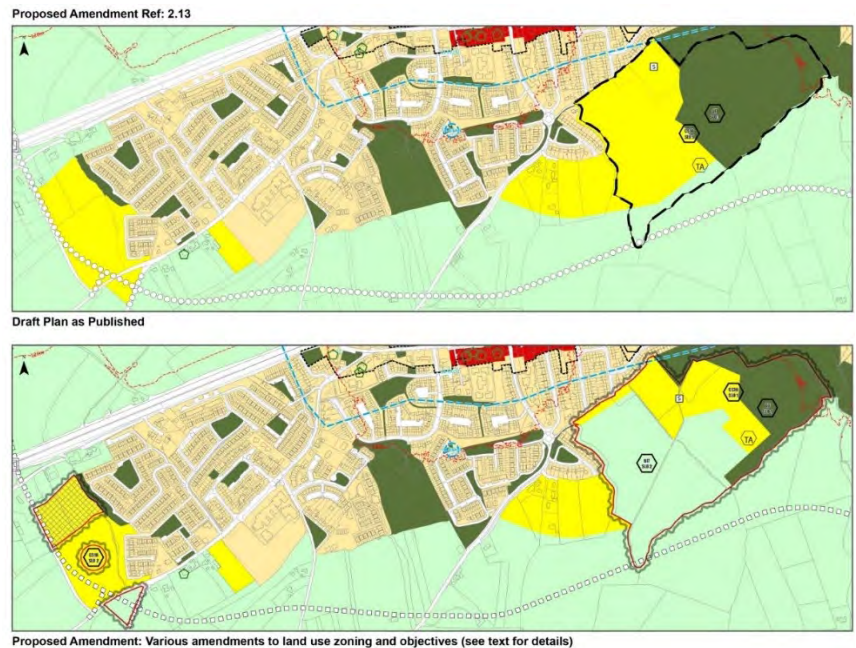
Chapter/ Section	Section 2.7.2 Self-Sustaining Growth Towns / Self-Sustaining Town - Newcastle
Amendment ref.	Amendment 2.12
Page no.	72
Policy/Objective No.	New CS9 Objective 4, CS9 SLO1, CS9 SLO2, CS9 SLO3, CS9 SLO4 - 2.7.2 Self-Sustaining Growth Towns / Self-Sustaining Town And Amend Map No. 7
Consequential Amendment	Consequential Amendment arising from Material Amendment 2.12 - View Consequential Amendments [PDF]

Associated Mapping Amendment



Chapter/ Section	Section 2.7.2 Self-Sustaining Growth Towns / Self-Sustaining Town – Rathcoole
Amendment ref.	Amendment 2.13
Page no.	73
Policy/Objective No.	New - 2.7.2 Self-Sustaining Growth Towns / Self-Sustaining Town And Amend Map 07 and 08
Consequential Amendment	Consequential Amendment arising from Material Amendment 2.13 - View Consequential Amendments [PDF]

Associated Mapping Amendment



Chapter/ Section

Individual Zoning Amendment

Amendment ref.

Amendment 2.14

Page no.

Map No. 9

Policy/Objective No.

Map No. 9 – Elder Heath

Associated Mapping Amendment

Proposed Amendment Ref: 2.15



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Proposed Amendment: Land Use Zoning RU to RES

Amendment ref.

Amendment 2.15

Page no.

Map No.9

Policy/Objective No.

Map No. 9 – Kiltipper Road

Associated Mapping Amendment

Proposed Amendment Ref: 2.15



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Proposed Amendment: Land Use Zoning RU to RES

Chapter/ Section	Individual Zoning Amendment
Amendment ref.	Amendment 2.18
Page no.	Map No.8
Policy/Objective No.	Map No. 8 – Mount Seskin

Associated Mapping Amendment

Proposed Amendment Ref: 2.18



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Proposed Amendment: Land Use Zoning OS to RU

Chapter/ Section	Individual Zoning Amendment
Amendment ref.	Amendment 2.19
Page no.	Map No. 9
Policy/Objective No.	Map. No 9 – Whitestown Way
Associated Mapping Amendment	

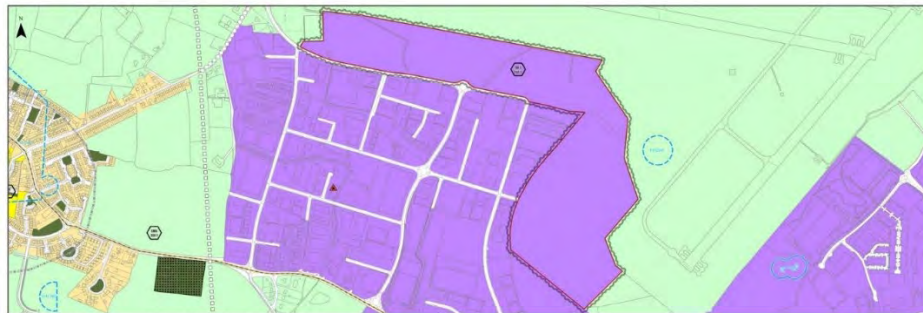


Chapter/ Section	Individual Zoning Amendment
Amendment ref.	Amendment 2.20
Page no.	Map No's 4 and 8
Policy/Objective No.	Map No's 4 and 8 - Greenogue
Associated Mapping Amendment	

Proposed Amendment Ref: 2.20



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Proposed Amendment: Land Use Zoning RU to EE

Chapter/ Section

Individual Zoning Amendment

Amendment ref.

Amendment 2.21

Page no.

Map No. 6

Policy/Objective No.

Map No. 6 - Spawell

Associated Mapping Amendment

Proposed Amendment Ref: 2.21



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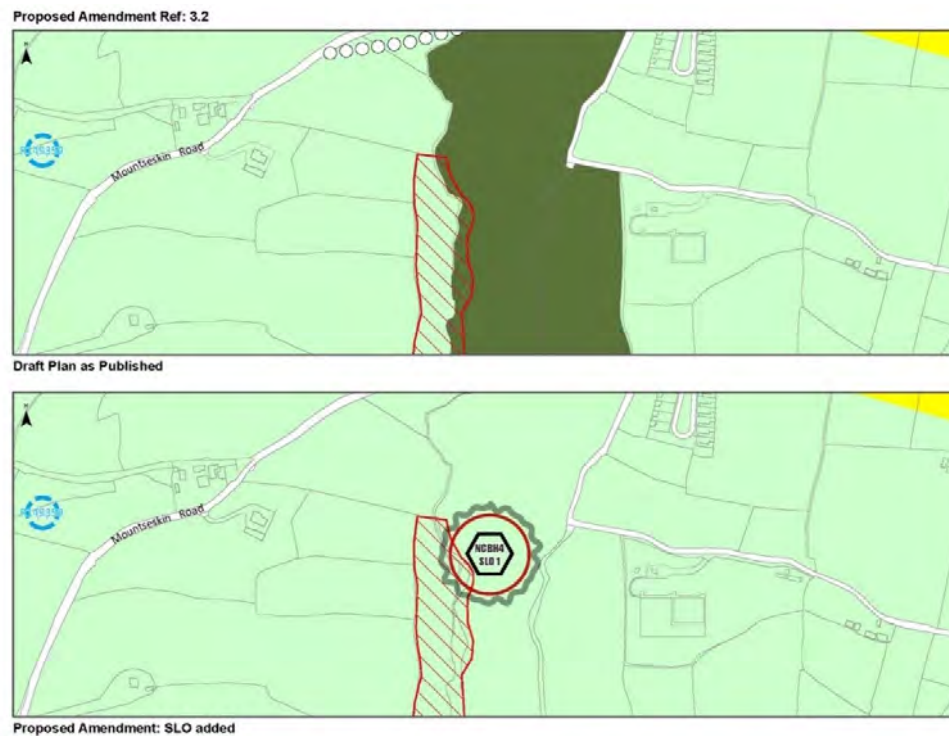


Proposed Amendment: Land Use Zoning OS to LC

Chapter 3 – Natural, Cultural and Built Heritage Material Amendment Associated Maps

Chapter/ Section	Section 3.3.3 Designated Areas for Nature Protection and Conservation
Amendment ref.	Amendment 3.2
Page no.	85
Policy/Objective No.	Amend Section 3.3.3
Associated Mapping Amendment	

Amend



Chapter/ Section

Section 3.5.3 Architectural Conservation Areas

Amendment ref.

Amendment 3.14

Page no.

117

Policy/Objective No.

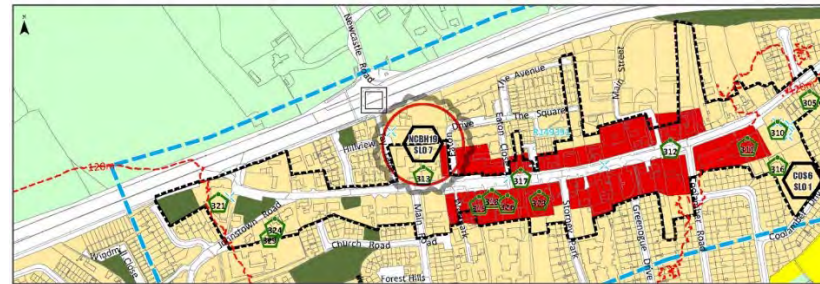
Add a new SLO to Section 3.5.2 - NCBH19: Protected Structures
Add new SLO: NCBH19 SLO 7

Associated Mapping Amendment

Proposed Amendment Ref: 3.14



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Proposed Amendment: SLO added

Chapter/ Section

Section 3.5.3 Architectural Conservation Areas

Amendment ref.

Amendment 3.15

Page no.

117

Policy/Objective No.

Text Change – Section 3.5.3

Associated Mapping Amendment

Proposed Amendment Ref: 3.15a



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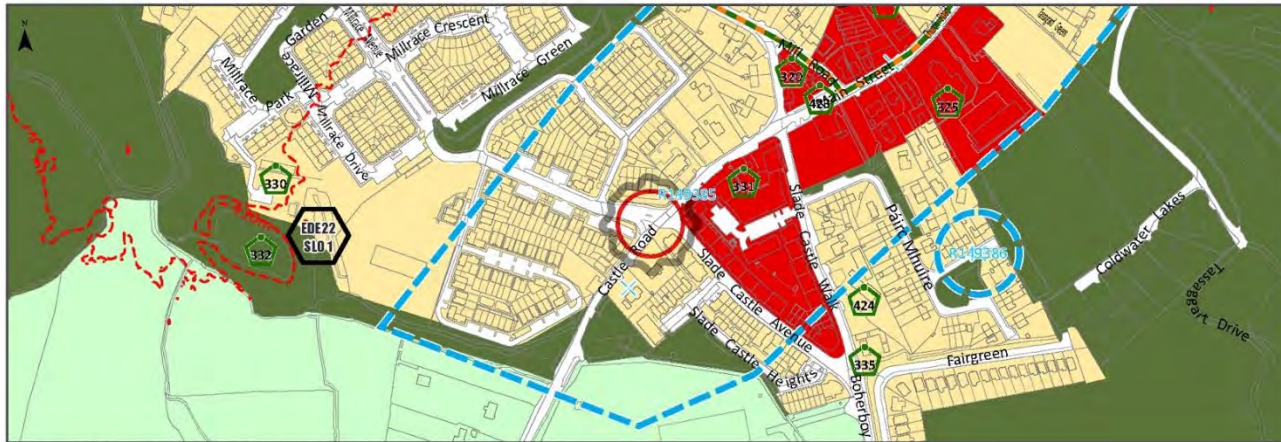


Proposed Amendment: SLO removed

Proposed Amendment Ref: 3.15b



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Proposed Amendment: SLO removed

Chapter/ Section

Section 3.5.3

Amendment ref.

Amendment 3.17

Page no.

120

Policy/Objective No.

Section 3.5.3

Associated Mapping Amendment

Proposed Amendment Ref: 3.17



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Proposed Amendment: ACA removed

Chapter/ Section

Section 3.5.3

Amendment ref.

Amendment 3.18

Page no.

120

Policy/Objective No.

Section 3.5.3

Associated Mapping Amendment

Proposed Amendment Ref: 3.18



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Proposed Amendment: ACA added SLO removed

Chapter 4 – Green Infrastructure Material Amendment Associated Maps

Chapter/ Section	Section 4.2.5 Landscape, Natural, Cultural and Built He
Amendment ref.	Amendment 4.9
Page no.	153
Policy/Objective No.	Insert New SLO GI7 SLO2
Associated Mapping Amendment	

Proposed Amendment Ref: 4.9



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Proposed Amendment: SLO added

Chapter 7 – Sustainable Movement Material Amendment Associated Maps

Chapter/ Section	Section 7.5.4 Active Travel and Schools
Amendment ref.	Amendment 7.10
Page no.	257
Policy/Objective No.	Insert New SLO SM2 SLO 4

Associated Mapping Amendment

Proposed Amendment Ref: 7.10



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Proposed Amendment: Insert a new SLO under Policy SM2 Walking and Cycling

Chapter 9 – Economic Development and Employment Material Amendment Associated Maps

Chapter/ Section	Section 9.2.3 Building on Clusters
Amendment ref.	Amendment 9.3
Page no.	340
Policy/Objective No.	EDE5 SLO 2
Associated Mapping Amendment	

Proposed Amendment Ref: 9.3



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Proposed Amendment: SLO amended

Chapter/ Section	Section 9.2.3 Building on Clusters
Amendment ref.	Amendment 9.4
Page no.	340
Policy/Objective No.	EDE5 SLO 3
Associated Mapping Amendment	

Proposed Amendment Ref: 9.4



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Proposed Amendment: SLO added