

# **Ballycullen - Oldcourt Local Area Plan**

## **Manager's Report on Submissions Received During Draft Consultation Programme**



January 2014  
Planning Department  
South Dublin County Council

## Introduction

The purpose of this Manager's Report is to present the outcome of the consultation programme carried out on the Draft Ballycullen - Oldcourt Local Area Plan, to respond to submissions made during the consultation period and to make recommendations in relation to the Draft Local Area Plan where appropriate.

## Outline of the Public Consultation Programme

A pre-draft consultation programme undertaken in preparation for a Draft a Local Area Plan for Ballycullen - Oldcourt was undertaken between April and May 2013. Taking the pre-draft submissions and feedback into consideration, the Draft Ballycullen – Oldcourt Local Area Plan (LAP) was prepared and then placed on public display in October 2013.

The public consultation programme for the Draft Ballycullen-Oldcourt LAP took place over a six week period between 18<sup>th</sup> of October 2013 and the 28<sup>th</sup> of November 2013 during which time information on the Draft Local Area Plan, environmental reports (SEA and Appropriate Assessment Screening) and public information sessions was disseminated to the public and submissions were invited as follows:

- Notification of the preparation and display of the Draft Ballycullen - Oldcourt LAP and Environmental Reports for the purpose of public consultation was placed in the *Irish Times* on the 18<sup>th</sup> of October 2013 and in the *Tallaght Echo* on the 24<sup>th</sup> of October 2013 together with information on the public consultation programme and an invitation for submissions.
- Letters that provided further notification of the Draft LAP consultation programme and an invitation for submissions were posted together with information leaflets to, inter alia, the Minister for the Environment, Community and Local Government; public sector agencies; non governmental agencies; and a variety of stakeholders including local residents' groups, local community groups and commercial and business interests within the area. This included those that made submissions during the pre-draft consultation programme. Letters and leaflets were also sent to all South Dublin County Council Elected Members.
- Circa 700 information leaflets on the Draft Plan and consultation programme were disseminated to residential and commercial properties within the area of the Draft LAP by way of a leaflet drop.
- Four public information sessions (see Photos in Appendix 3) providing one to one consultations were attended by Council staff in the Park Community Centre, Ballycragh Park, Parklands Road off Killinenny Road on the following dates:

Tuesday	5 <sup>th</sup> November 2013	5.00pm – 8.00pm
Thursday	7 <sup>th</sup> November 2013	2.00pm – 5.00pm
Monday	18 <sup>th</sup> November 2013	5.00pm – 8.00pm
Wednesday	20 <sup>th</sup> November 2013	11.00am – 2.00pm
- Permanent information displays together with copies of the Draft LAP and Environmental Reports were placed in County Hall Tallaght, County Library Tallaght and in the Park Community Centre (Ballycragh Park). The display material included hard copies of the Draft LAP and Environmental Reports, CDs containing the Draft LAP, a copy of the Newspaper Notice, information posters and leaflets.
- Information on the Draft LAP consultation programme together with an invitation for submissions and a press release was placed on the South Dublin County Council website. The information displayed included the Draft LAP, the SEA Environmental Report, the Appropriate Assessment Screening Report, the Draft LAP consultation information leaflet and posters. Details were also placed on the Council's Facebook and Twitter pages together with regular reminders.
- Council staff were made available to answer queries on a one to one basis at County Hall Tallaght every Wednesday afternoon during the Draft LAP consultation period. Direct contact information for making additional queries during the consultation period was provided on public notices, letters and leaflets.

## Outcome of the Draft LAP Consultation Programme

The total number of people that attended the one to one public information sessions in the Park Community Centre and who spoke to Council Staff in County Hall on Wednesday afternoons came to 107. The number of submissions that were received during the prescribed public consultation period came to 186. A submission from the Stocking Wood Estate Residents Committee included a petition signed by 207 residents. An additional 8 late submission were received by the Council.

A list of all the persons/bodies that made submissions within the prescribed public consultation period is provided in Table 1 below together with a reference number that can be clicked as a link (on electronic copies of this Manager's Report) to a database containing scanned copies of each submission. For reasons of data protection, these links can only be accessed by Elected Members of South Dublin County Council.

**TABLE1: PERSONS/BODIES THAT MADE SUBMISSIONS**

<b>Person</b>	<b>Body Represented (if applicable)</b>	<b>Reference</b>
Fionnuala Ní Riain	Principal of Gaelscoil na Giuise	<a href="#">DraftOB0001</a>
Aisling Breathnach		<a href="#">DraftOB0002</a>
James Robertson		<a href="#">DraftOB0003</a>
Grainne Byrne		<a href="#">DraftOB0004</a>
Doug McNair		<a href="#">DraftOB0005</a>
Niall McMahon		<a href="#">DraftOB0006</a>
Susan Diskin		<a href="#">DraftOB0007</a>
Pat O'Donoghue	Railway Procurement Authority	<a href="#">DraftOB0008</a>
Brendan Glynn		<a href="#">DraftOB0009</a>
Hilary Fitzpatrick		<a href="#">DraftOB0010</a>
Eimear Lee Moloney		<a href="#">DraftOB0011</a>
Gavin Rafferty		<a href="#">DraftOB0012</a>
Paddy Curran		<a href="#">DraftOB0013</a>
Anna Nagle		<a href="#">DraftOB0014</a>
John Stokes	Churchdown Ltd	<a href="#">DraftOB0015</a>
Paul Turner		<a href="#">DraftOB0016</a>
Christine Callaghan		<a href="#">DraftOB0017</a>
Rosemarie Lalor		<a href="#">DraftOB0018</a>
Cathy Murray		<a href="#">DraftOB0019</a>
Nadine Fiebich		<a href="#">DraftOB0020</a>
Carol Ellis		<a href="#">DraftOB0021</a>
Allister Gerrard		<a href="#">DraftOB0022</a>
Michael McCormack	National Roads Authority	<a href="#">DraftOB0023</a>
Senator Cáit Keane	Fine Gael Spokesperson on Community, Housing and Local Government	<a href="#">DraftOB0024</a>
Ronan Daly	Stocking Avenue Management Company	<a href="#">DraftOB0025</a>
Fiona Hanaphy		<a href="#">DraftOB0026</a>
Catherine Tolan		<a href="#">DraftOB0027</a>
Michael Tolan		<a href="#">DraftOB0028</a>
Peter Grealish		<a href="#">DraftOB0029</a>
Máiread De Faoite		<a href="#">DraftOB0030</a>
Ivers Desilva		<a href="#">DraftOB0031</a>
Anna Doyle		<a href="#">DraftOB0032</a>
Nicola Lundberg		<a href="#">DraftOB0033</a>
Paul Fanning		<a href="#">DraftOB0034</a>
Ciara Hennessy	Firhouse Community Centre	<a href="#">DraftOB0035</a>
Paul Needham		<a href="#">DraftOB0036</a>
Cian O'Mahony	Environmental Protection Agency	<a href="#">DraftOB0037</a>
Jeremy Goldwater	Stocking Wood Residents Committee (Including a Petition with 207 signatures)	<a href="#">DraftOB0038</a>
Laura Campbell		<a href="#">DraftOB0039</a>
Tomás Ó hAonghusa	Gaelscoil na Giuise	<a href="#">DraftOB0040</a>
Aidan Colreavy		<a href="#">DraftOB0041</a>
Antoinette Smith Kennedy		<a href="#">DraftOB0042</a>
Maura Lundberg		<a href="#">DraftOB0043</a>
Sharon Delaney		<a href="#">DraftOB0044</a>
John Farrell		<a href="#">DraftOB0045</a>
Brian O'Connor		<a href="#">DraftOB0046</a>
Sarah Holland		<a href="#">DraftOB0047</a>
Alison O'Connor		<a href="#">DraftOB0048</a>
Deirdre Edge		<a href="#">DraftOB0049</a>
Gavin Kearns		<a href="#">DraftOB0050</a>

Stephen O'Reilly	ESB Networks	<a href="#">DraftOB0051</a>
Louise Purcell		<a href="#">DraftOB0052</a>
John Butler	Geological Survey of Ireland	<a href="#">DraftOB0053</a>
Joanna Uí Chúláin		<a href="#">DraftOB0054</a>
Fionnuala Ní Riain	Board of Management Gaelscoil na Giuise	<a href="#">DraftOB0055</a>
Councillor Paddy Cosgrave	Elected Representative of South Dublin County Council Chair Rathfarnham Area Committee	<a href="#">DraftOB0056</a>
Rachel Freeman		<a href="#">DraftOB0057</a>
Jonathan Lundberg		<a href="#">DraftOB0058</a>
Con Caroll		<a href="#">DraftOB0059</a>
Karen Gleeson-Duggan		<a href="#">DraftOB0060</a>
Henry O'Reilly		<a href="#">DraftOB0061</a>
Ray O'Malley	Kieran O'Malley & Co. Ltd Representing Ballyboden S Endas GAA Club	<a href="#">DraftOB0062</a>
Marcus Ó Léanacháin		<a href="#">DraftOB0063</a>
Phil Hogan TD	Minister of Environment, Community and Local Government	<a href="#">DraftOB0064</a>
Clare Connolly	Department of Education and Skills	<a href="#">DraftOB0065</a>
Patrick Leonard	An Taisce	<a href="#">DraftOB0066</a>
Veronica MacMillan		<a href="#">DraftOB0067</a>
Jack Byrne	Castlefield Flood Drainage Committee	<a href="#">DraftOB0068</a>
Elaine Forde		<a href="#">DraftOB0069</a>
Donagh McCleary		<a href="#">DraftOB0070</a>
Frank Ward		<a href="#">DraftOB0071</a>
Niamh Fitzgerald		<a href="#">DraftOB0072</a>
P Curran		<a href="#">DraftOB0073</a>
David Edge		<a href="#">DraftOB0074</a>
Yifan Yang		<a href="#">DraftOB0075</a>
Sarah Haughton		<a href="#">DraftOB0076</a>
Catherine Martin		<a href="#">DraftOB0077</a>
Kay Dolan		<a href="#">DraftOB0078</a>
Derek Murray		<a href="#">DraftOB0079</a>
Joby Thomas		<a href="#">DraftOB0080</a>
Jishamol Varghese		<a href="#">DraftOB0081</a>
Resident		<a href="#">DraftOB0082</a>
Adrian Howard		<a href="#">DraftOB0083</a>
Anna Sadlier		<a href="#">DraftOB0084</a>
Rob Sadlier		<a href="#">DraftOB0085</a>
Orlagh Sampson		<a href="#">DraftOB0086</a>
Beata Bednarsua		<a href="#">DraftOB0087</a>
Adam Bednarski		<a href="#">DraftOB0088</a>
Cara Carter		<a href="#">DraftOB0089</a>
Chris Carter		<a href="#">DraftOB0090</a>
Valerie Hewson		<a href="#">DraftOB0091</a>
Ann Marie Caden		<a href="#">DraftOB0092</a>
Jennifer McCormack		<a href="#">DraftOB0093</a>
John Keogh		<a href="#">DraftOB0094</a>
Susan Hegarty		<a href="#">DraftOB0095</a>
David Egan		<a href="#">DraftOB0096</a>
Annette Egan		<a href="#">DraftOB0097</a>
Helen Gallagher		<a href="#">DraftOB0098</a>
Stephen Gallagher		<a href="#">DraftOB0099</a>
Michelle Mahon		<a href="#">DraftOB0100</a>
Maurice Mahon		<a href="#">DraftOB0101</a>
Laura Walsh		<a href="#">DraftOB0102</a>
Lovenesse Ruske		<a href="#">DraftOB0103</a>
Bing Bing Wang		<a href="#">DraftOB0104</a>
David Connery		<a href="#">DraftOB0105</a>
Michael Kelly		<a href="#">DraftOB0106</a>
Barry Killeen		<a href="#">DraftOB0107</a>
Chun Lin Luo		<a href="#">DraftOB0108</a>
Amanda West	St Anne's GAA Club	<a href="#">DraftOB0109</a>
Aileen O'Dwyer-Papp		<a href="#">DraftOB0110</a>
Helen O'Toole	Sports Investment Group	<a href="#">DraftOB0111</a>
John Boyle	Ballyboden Wanderers GAA	<a href="#">DraftOB0112</a>
Francis Noel Duffy	Green Party Group Secretary	<a href="#">DraftOB0113</a>
Kyran O'Neill		<a href="#">DraftOB0115</a>
Richard Barry		<a href="#">DraftOB0116</a>
David J.A. Douglas		<a href="#">DraftOB0117</a>
William Scally		<a href="#">DraftOB0118</a>
Alan Kearns		<a href="#">DraftOB0119</a>

Hazel Dowling		<a href="#">DraftOB0120</a>
Michael McCoy	Dublin Mountain Conservation and Environment Group	<a href="#">DraftOB0121</a>
Eoin Carroll		<a href="#">DraftOB0122</a>
Luke Doyle		<a href="#">DraftOB0123</a>
David Henningan		<a href="#">DraftOB0124</a>
Kieran Browne		<a href="#">DraftOB0125</a>
Daniel Shanahan	Stillorgan Rugby Football Club	<a href="#">DraftOB0126</a>
Regina Kelly		<a href="#">DraftOB0127</a>
Cliona Ryan	Ryan Nowlan Consulting representing Joint Statutory Receivers	<a href="#">DraftOB0128</a>
Lisa McCarthy		<a href="#">DraftOB0129</a>
Derek McHugh	Knocklyon United Football Club	<a href="#">DraftOB0130</a>
Tracy Armstrong	Fenton & Associates representing Ladbuzz Ltd (Landowner)	<a href="#">DraftOB0131</a>
Jonathan Lundberg	Cumann Tuismitheoir Gaelscoil na Giuise	<a href="#">DraftOB0132</a>
Shirley Crosbie	Office of Public Works	<a href="#">DraftOB0133</a>
Trevor Sadler	McGill Planning Ltd representing Ballycullen Ltd Partnership	<a href="#">DraftOB0134</a>
Martina Merren		<a href="#">DraftOB0135</a>
Elaine McSherry		<a href="#">DraftOB0136</a>
Paul Donohue		<a href="#">DraftOB0137</a>
Karen Donohue		<a href="#">DraftOB0138</a>
Maura Tarrant		<a href="#">DraftOB0139</a>
Councillor Chris Bond	Elected Representative of South Dublin County Council	<a href="#">DraftOB0140</a>
Sinead McGowan		<a href="#">DraftOB0141</a>
Eva Rice		<a href="#">DraftOB0142</a>
Clive Sharp	Woodstown Village Residents Association	<a href="#">DraftOB0143</a>
Odhran Esdale		<a href="#">DraftOB0144</a>
Martin Donaghy		<a href="#">DraftOB0145</a>
Stephen Mason	Mr P & K Smith - Landowners	<a href="#">DraftOB0146</a>
Mairead Flanagan		<a href="#">DraftOB0147</a>
Eamon Maloney TD		<a href="#">DraftOB0148</a>
Gillian Hynes		<a href="#">DraftOB0149</a>
Neil Howard		<a href="#">DraftOB0150</a>
Caroline Byrne		<a href="#">DraftOB0151</a>
Rosita Buciate		<a href="#">DraftOB0152</a>
David Rice		<a href="#">DraftOB0153</a>
Georgina Rice		<a href="#">DraftOB0154</a>
Mark Donnellan		<a href="#">DraftOB0155</a>
Chen Chen		<a href="#">DraftOB0156</a>
Fidelma Hemon		<a href="#">DraftOB0157</a>
Viv Reilly		<a href="#">DraftOB0158</a>
Colin Conway		<a href="#">DraftOB0159</a>
Neil Baron		<a href="#">DraftOB0160</a>
Grainne Gath		<a href="#">DraftOB0161</a>
Samantha O'Sullivan		<a href="#">DraftOB0162</a>
Margaret Milten		<a href="#">DraftOB0163</a>
Cormac Langford		<a href="#">DraftOB0164</a>
David Daly		<a href="#">DraftOB0165</a>
Brendan Glynn		<a href="#">DraftOB0166</a>
Aoife Murray		<a href="#">DraftOB0167</a>
Catriona Bergin		<a href="#">DraftOB0168</a>
Stephen Ellis		<a href="#">DraftOB0169</a>
Yazdani		<a href="#">DraftOB0170</a>
Susan Diskin		<a href="#">DraftOB0171</a>
Melanie Kiernan		<a href="#">DraftOB0172</a>
Robert Lee		<a href="#">DraftOB0173</a>
Patrick Carr		<a href="#">DraftOB0174</a>
Nikki Condron		<a href="#">DraftOB0175</a>
Nicola Ryan		<a href="#">DraftOB0176</a>
Paul Ruane		<a href="#">DraftOB0177</a>
Gimmy Rice		<a href="#">DraftOB0178</a>
Patricia Carroll		<a href="#">DraftOB0179</a>
Gerard O'Brien		<a href="#">DraftOB0180</a>
Cllr. Anne-Marie Dermody	Elected Representative of South Dublin County Council	<a href="#">DraftOB0181</a>
David Clements	National Transport Authority	<a href="#">DraftOB0182</a>
Councillor Brian Lawlor	Elected Representative of South Dublin County Council	<a href="#">DraftOB0183</a>
Michael Murphy	Department of Art, Heritage and the Gaeltacht	<a href="#">DraftOB0184</a>
Karen Connolly		<a href="#">DraftOB0185</a>
Peter Black		<a href="#">DraftOB0186</a>
Shane Hayes	Office of Public Works	<a href="#">DraftOB0187</a>

## Summary of Issues Raised in Submissions

All 186 of the submissions received by the Council during the prescribed public consultation time period were read, summarised and analysed. A total of 35 issues were identified during this process. Many of the issues raised related directly to a section or sections of the Draft Local Area Plan. The summarised issues were therefore collated and categorised under the relevant headings contained within the Draft Local Area Plan.

The main category headings and the number of times that issues were raised under each category heading are detailed under Table 2 below.

In terms of the issues that were raised most frequently, the highest number (46 times/12% of issues raised) related to Vehicular Movement. The second highest proportion of issues raised (40 times/10.5%) related to the Development Plan Zoning of the Plan Lands. The third highest proportion of issues raised (38 times/10%) related to Open Space Hierarchy and Functions.

Other issues that featured prominently related to School Provision (26 times/6.8% of issues raised), Lands, Structures or Issues Outside the Remit of the Plan (25 times/6.5% of issues raised) and the Phasing Strategy (24 times/6.3%).

**TABLE2: MAIN SUBMISSION CATEGORY HEADINGS**

Category Heading	Item Number in Appendix 1	Number of Times Raised	% of Issues Raised
Accessibility and Movement Strategy (General)	24	3	0.79%
Appropriate Assessment	34	1	0.26%
Artist's Impression	22	2	0.52%
Building Design and Heights	16	18	4.71%
Car Parking	28	3	0.79%
Cul-de-sacs and Gated Estates	6	2	0.52%
Development & Population Analysis	1	1	0.26%
Development Plan Zoning of Plan Lands	25	40	10.47%
Dwelling Mix	13	6	1.57%
Energy Efficient Building Design and Layout	17	1	0.26%
Flood Risk Management	31	4	1.05%
Green Buffers to Mountains and M50	10	6	1.57%
Green Infrastructure Appraisal	35	1	0.26%
Highly Constrained Areas	32	2	0.52%
Integrated Street Network	2	16	4.19%
Lands, structures or issues outside remit of Plan	23	25	6.54%
Local Shopping & Community Facilities	14	18	4.71%
Miscellaneous	21	3	0.79%
Oldcourt Replacement Playing Pitches	30	1	0.26%
Open Space Hierarchy & Functions	11	38	9.95%
Pedestrian Movement, Cyclist Movement & Universal Access	3	13	3.4%
Phasing Strategy	18	24	6.28%
Protection and Incorporation of Natural Heritage	8	10	2.62%
Public Transport Accessibility	4	14	3.66%
Quantum of Development	19	3	0.79%
Residential Development Options & Density	12	19	4.97%
School Provision	15	26	6.81%
Standards and Design Criteria	20	2	0.52%
Strategic Environmental Assessment	27	6	1.57%
Street Design	33	2	0.52%
Tracks and Trails	9	4	1.05%
Utilities	29	1	0.26%
Vehicular Movement	5	46	12.04%
Water Management and Flood Risk	26	15	3.93%
Watercourses and Water Management	7	19	4.97%

Full summaries of each of the issues raised are organised under the aforementioned category headings and item numbers in Appendix 1 together with the corresponding opinions and recommendations of the Manager.

## Recommended Changes to the Draft LAP

The recommended alterations to the Plan proposed in this Manager's Report further to public consultation are set out in Table 3 below. The alterations are collated under the relevant category headings and item numbers as introduced in Table 2 above and utilised together with numbering in Appendix 1 of this Manager's Report (submission summaries). The category headings correspond with the relevant headings contained within the Draft Ballycullen-Oldcourt Local Area Plan. The recommended alterations should therefore be read in conjunction with the Draft Plan.

Appendix 2 comprises an Environmental Report with responses to environmental issues.

**TABLE 3: RECOMMENDED CHANGES TO DRAFT LAP**

<b>Heading</b>	<b>Proposed Alteration</b>
2. Integrated Street Network	Alter Draft Local Area Plan with an objective (Cul-de-sacs and Gated Estates - Appendix 1) that requires conditions to be attached to any further residential development that proposes a temporary barrier/cul de sac across a planned through street. Such conditions should require the erection of clear signage on all such temporary barriers/cul-de-sacs that communicates the temporary nature of the cul-de-sac/barrier and the planned provision of a through street.
5. Vehicular Movement	Alter Draft Local Area Plan (Accessibility and Movement Strategy, Land Use and Density Strategy and Artist's Impression) to replace the proposed vehicular link street to zoned lands to the south of Stocking Wood via Stocking Wood Drive with a pedestrian and cyclist link. Amend Accessibility and Movement Framework (Fig 5.1), Landuse and Density Framework (Fig 5.3) and the Illustrated Layout for the Plan Lands (Fig. 5.6) accordingly.
6. Cul-De-Sacs and Gated Estates	Amend Section 5.2.7 of the Draft Local Area Plan to state that the upgrade of existing streets that were planned as cul-de-sac could be carried out as part of a permeability project that involves further consultation with local residents and that such projects should not significantly interfere with the SUDS strategy for the Plan Lands.
<b>Grouped Water Management/ Flooding Issues</b>	<u>General</u> <ul style="list-style-type: none"> <li>Alter the Green Infrastructure Strategy Objectives of the Draft Plan (Appendix 1) to require the attachment of conditions to permissions that would require all existing and proposed ditches, culverts and SUDS elements to be cleared (in a manner that is in accordance with best ecological practise to protecting Flora and Fauna) and kept free of debris, waste and building rubble before, during and after construction.</li> </ul>
7. Watercourses And Water Management	
26. Water Management And Flood Risk	<u>Ballycullen Stream Catchment</u> <ul style="list-style-type: none"> <li>Alter Draft Local Area Plan in a manner that requires any development proposed within the catchment of the Ballycullen Stream to demonstrate that the majority of surface water generated by the development will be dealt with on-site and that any additional run-off will be directed to a surface water drainage system outside of the Ballycullen Stream catchment. If it is proposed to discharge surface water via the private drainage system that serves Stocking Avenue and Stocking Wood to the east of the Ballycullen Road, this shall be accompanied by documentation that demonstrates consent to access and utilise the private drainage system. No development that proposes to discharge additional surface water run-off to the Ballycullen Stream shall occur until such time as an appropriate Ballycullen Stream Flood Alleviation Scheme in place.</li> <li>Include a map that illustrates the extent of the catchment of the Ballycullen Stream.</li> <li>Incorporate 8.5 hectares of lands zoned for open space (objective F under County Development Plan) around Saint Colmcille's Well in LAP drawings (Green Infrastructure Strategy, Land Use and Density and Artists' impression) to accommodate a possible attenuation area that will help intercept and absorb storm water flows from the upper catchment of the Ballycullen Stream.</li> </ul>
31. Flood Risk Management	<u>Sequential Approach</u> <ul style="list-style-type: none"> <li>Alter Section 5.3.2 of the Draft Local Area Plan to clarify that the sequential approach sets out to avoid, substitute, justify, mitigate and (where the Justification Test has been passed) manage flood risks.</li> <li>Alter Objective GI7 of the Draft Local Area Plan to state that site specific flood risk assessment of lands identified as being at risk of flooding will entail Stage 3 Detailed Risk Assessment and, where avoidance of flood risk is not possible, vulnerable uses such as residential, community and commercial uses should be substituted with less vulnerable uses such as parks and open spaces.</li> <li>Alter Green Infrastructure Strategy map (Figure 5.2), the Overall Strategy Map (Figure 5.3) and the Illustrated Layout/Artist's Impression (Figure 5.6) to identify the area around the location of the existing Oldcourt GAA pitches and the areas identified by the OPW's PFRA maps as being at potential risk of flooding for Stage 3 Flood Risk Assessment.</li> </ul>
	<u>Oldcourt Lands</u> <ul style="list-style-type: none"> <li>Alter Flood Risk identification maps and data (Figure 3.1 - existing Green Infrastructures and Section 3.3.5 – Water Management and Flood Risk) to identify the</li> </ul>

	<p>central branch of the Oldcourt stream that traverses the Plan Lands and adjacent GAA pitches as being at risk of flooding.</p> <ul style="list-style-type: none"> <li>Alter Section 3.3.5 of the Draft Plan (Water Management and Flood Risk) to state that the source data for identifying the GAA pitches as being at flood risk derives from evidence of an extensive flood event submitted during the public consultation process and subsequent site visits by Council staff. It should also be indicated that evidence of flooding at the junction of Oldcourt Lane and Oldcourt Road coincides with an area of flood risk identified under the OPW preliminary flood risk data and that both reported flood events have occurred in areas where branches of the Oldcourt Stream meet culverts.</li> <li>Insert a specific objective and map into Appendix 1 (specific objectives) that identifies the area of potential flood risk around the existing Oldcourt GAA pitches and requires any proposed development that is potentially sensitive to flooding to be subject to the sequential approach of avoid, substitute, justify, mitigate and (where the Justification Test has been passed) manage flood risks in accordance with <i>The Planning System and Flood Risk Management– Guidelines for Planning Authorities</i> (2009). These areas will require Site Specific Stage 3 Detailed Flood Risk Assessment including the likely impact of any displaced flood water on third parties. Include a requirement that if it cannot be demonstrated that both the actual and residual flooding issues can be dealt with in an acceptable manner including the impact of any displaced flood water on third parties, then the development of these lands shall be confined to water compatible development only (in accordance with the precautionary approach) such as amenity spaces, outdoor sports and recreation spaces that include SUDS elements and integrate with the SUDS strategy for the Plan Lands.</li> </ul>
9. Tracks And Trails	Alter the Tracks and Trails sections of the Draft Local Area Plan (5.3.4 and Appendix 1 – Plan Objectives) to highlight the importance of protecting flora and fauna including habitats and the introduction of mitigating measures to protect ecosystems through the sensitive design, lighting and construction of tracks and trails with reference to the requirements of the standards section of the Draft Local Area Plan.
10. Green Buffers to Mountains and M50	Alter Section 5.3.6 of the Draft Local Area Plan (Green Buffers to M50 and Mountains) to clarify that the costs and construction of all planned green buffers and their components including noise mitigating measures, SUDS features and tracks and trails will be borne by developers.
11. Open Space Hierarchy & Functions	Amend Table 5.3 of the Draft Local Area Plan to suggest the provision of allotments in Neighbourhood Parks and state that active recreation facilities in Neighbourhood Parks should take the form of children’s play facilities and sports facilities such as tennis courts, basketball courts and multi-use games areas.
	Alter the Draft Plan’s Green Infrastructure Strategy (Section 5.3) to include a heading with text that reiterates the requirements to provide children’s play facilities in the form of NEAPS, LEAPS and YCAPS within neighbourhood parks and local pocket parks with reference to requirements of Table 5.3 of the Draft Plan, the Phasing Strategy (Section 6.0) and the Standards and Design Criteria Section (Appendix 2).
15. School Provision	Alter the Site Specific Objectives for the Stocking Avenue Primary School Site and Oldcourt School Site (Appendix 1) to reiterate the requirement for vehicular access to school sites to be designed to include safe queuing and drop-off facilities.
16. Building Design And Heights	Extend Draft LAP restriction of no more than two storeys for new housing backing onto or adjacent to single storey housing or sharing a common boundary (Section 5.5.4) to include new housing in the vicinity of single storey dwellings on the Lower Slope Lands such as Oldcourt Cottages and Ely Drive.
18. Phasing Strategy	Alter Phasing Strategy text (Section 6.3) and footnote to table for Phase One on the eastern side of the Plan lands (Section 6.3.1) to clarify that Phase One includes lands that are subject to extant permissions but is not exclusive to such lands.
20. Standards And Design Criteria	Alter Draft Local Area Plan by inserting paragraph into the Standards and Design Criteria Section (Appendix 2 – Materials and Finishes) that requires children’s play equipment and finishes to be constructed of low maintenance and weather resistant materials.
24. Accessibility And Movement Strategy	Make reference to <i>Spatial Planning and National Roads Guidelines for Planning Authorities</i> (2012) and the <i>Draft Greater Dublin Area Cycle Network Plan</i> (2013) in Appendix 4 (Policy and Strategic Context) of the Draft Local Area Plan.
	Alter Objectives AM4, AM6 AND AM14 to clarify that development proposals shall contribute to the creation of a clear hierarchy of streets that are each designed in accordance with their movement functions and in a manner that maximises route choices for pedestrians and cyclists, manages traffic and vehicular speeds, attracts larger volumes of traffic to more strategic links and discourages through traffic from local streets.
30. Oldcourt Replacement Playing Pitches	Amend Objective SSP14 of the Draft Plan to allow for the provision of floodlighting for the proposed replacement Gunny Hill Playing Pitches subject to the submission of a Bat Survey, the retention and augmentation of hedgerow boundaries (to provide for uninterrupted wildlife corridors/foraging routes and reduce visual impacts) and the provision of specialist lighting that will limit any adverse impacts on bat species, which shall be all sufficiently demonstrated and detailed at planning application stage.
32. Highly Constrained Areas	It is recommended that a new title be added before the second paragraph in Section 5.1 to indicate that two potential development options are presented for the western side of the Plan Lands and that Option A is the preferred option.



**Conclusion**

It is recommended that the Ballycullen-Oldcourt Local Area Plan, as drafted, be made subject to the alterations outlined in this Manager's Report.



County Manager

10<sup>th</sup> January 2014

\_\_\_\_\_  
Date

## **APPENDIX 1: SUBMISSION SUMMARIES, MANAGER'S OPINION & RECOMMENDATIONS**

This Appendix presents a summary of each of the issues raised (under the relevant category heading), the responses of the Manager and recommendations in relation to alterations to the Draft Local Area Plan.

Each of the issues listed includes a reference that can be clicked as a link (on electronic copies of this Manager's Report) to a database containing scanned copies of each submission. For reasons of data protection, these links can only be accessed by Elected Members of South Dublin County Council.

The responses of the Manager have been framed taking account of the statutory obligations of the local authority, relevant Government and Ministerial guidelines and the proper planning and sustainable development of the area.

In accordance with Planning and Development Legislation, summaries of the Issues raised and recommendations made by National Transport Authority (reference [DraftOB0182](#)) are included under headings on Phasing (Issue 22), Cul-de-sacs and Gated Estates (Issue 6), Street Design (Issue 30), Accessibility and Movement Strategy (Issue 1), Pedestrian Movement, Cyclist Movement & Universal Access (Issue 21). The recommendations of the manager in relation to these issues and recommendations are set out accordingly.

## 1 DEVELOPMENT & POPULATION ANALYSIS

### Issues Raised

1. Traffic modelling required to determine the impact of increased traffic at peak times. ([DraftOB0019](#))

### Response

The majority of the Plan Lands have been zoned for residential development under the *South Dublin County Council Development Plan*, (see response to Development Plan Zoning of Plan Lands below – issue 25) having been initially zoned for such development under the 1998 and 2004 County Development Plans. The traffic impacts of any proposed development within the Plan Lands will be assessed at planning application stage.

Any large scale planning applications for residential development within the Plan Lands will be accompanied by an Environmental Impact Assessment (EIS), which must include an assessment of impacts on human beings including traffic. Such traffic assessments normally come in the form of a Traffic Impact Assessment that model traffic impacts at peak journey times.

### Recommendation

No alteration(s) to Draft Local Area Plan recommended

## 2 INTEGRATED STREET NETWORK

### Issues Raised

1. Resident of Stocking Wood Copse objects to the proposed vehicular and pedestrian access to Woodtown lands via Stocking Wood Copse for the following reasons: - Increase in traffic, noise pollution and children playing. - Line of trees separating Stocking Wood Copse from Woodtown should be protected. - Two access roads should be sufficient to serve the Woodtown Lands with no access via Stocking Wood. ([DraftOB0004](#))
2. Resident of Stocking Wood Green objects to the proposed vehicular and pedestrian access to lands to the south for the following reasons: - Increase in traffic congestion on narrow roads and increase in noise and air pollution; children's safety; two access roads should be sufficient to serve these lands with no access via Stocking Wood; roads not suitable during winter conditions; building site traffic unsuitable for existing roads; lack of parking; surface water and flooding from new development. ([DraftOB0012](#))
3. Resident of Stocking Wood Manor objects to the proposed vehicular and pedestrian access to lands to the south for the following reasons: - Increase in traffic congestion on narrow roads; children's safety; two access roads should be sufficient to serve these lands with no access via Stocking Wood; roads not suitable during winter conditions. ([DraftOB0010](#))
4. Residents of Stocking Wood objects to the vehicular and pedestrian access to lands to the south for the following reasons: Increased Traffic Congestion in Stocking Wood; increased noise and air pollution; children's safety; existing roads are too narrow; dangerous existing parking conditions; two accesses would be sufficient due to proposed lower densities; roads not suitable during winter conditions; construction traffic would be unacceptable; non-resident parking; the loss of the mountain view – height restrictions should apply; the possibility of flooding. ([DraftOB0009](#) [DraftOB0013](#))
5. Objects to the proposed pedestrian and vehicular access to Plan Lands to the south through Stocking Wood for the following reasons: Stocking Wood is a stand alone estate; there are alternative accesses; increase in noise and air pollution; risk to children's safety; inadequate parking spaces; Winter conditions make the streets impassable; existing roads too narrow and cannot accommodate further traffic; the payment of a management fees to upkeep the area; increased traffic volumes and congestion, noise pollution and air pollution during construction work. Also requests that full pedestrian/cycle access be provided to Knocklyon via Woodstown. ([DraftOB0019](#))
6. Extract from Stocking Wood Residents Association submission refers to concerns in relation to the impact of vehicular/pedestrian access via Stocking Wood on the safety of children and car parking. ([DraftOB0024](#))

7. Objects to the proposed pedestrian access through Stocking Wood for the following reasons: Stocking Wood is a stand alone estate; access to any new developments should be via their own vehicular access not via Stocking Wood Estate; Stocking Wood has no amenities to offer the community and pedestrian access would not be necessary; increased pedestrian access would compromise the privacy of existing residents as their dining rooms and kitchens can be viewed from the street; who will contribute to the repair and maintenance of the privately managed streets when pedestrian movement increases. ([DraftOB0025](#))
8. The Stocking Wood Estate Residents Committee are strongly against proposals for vehicular and pedestrian access to lands to the south of Stocking Wood via Stocking Wood for the following reasons: - Stocking Wood Drive is not wide enough for two way traffic and there is a risk of damage to parked cars and an increased potential for collision between cars with a reduction in child safety especially in cul-de-sacs. - Traffic and noise pollution in Stocking Wood would increase with the additional access via Stocking Wood Drive and Stocking Wood Copse, which may also lead to an increase in rush hour traffic. - Snow and ice has compacted on roads in Stocking Wood during bad weather periods leading to cars being abandoned on Stocking Avenue. Additional roads joining Stocking Wood Drive and Stocking Wood Copse will increase the volume of abandoned vehicles. - The context in relation to older planning applications/permission for access via Stocking Wood has changed. - A petition signed by 207 residents against vehicular access from Stocking Wood Drive and Stocking Wood Copse to "proposed new development lands" to the south of Stocking Wood is enclosed. - Construction traffic using Stocking Wood roads to gain access to lands would generate large volumes of dirt and noise, affect children's safety and impact on the quality of life for residents. - Extension of Stocking Wood Drive and Copse into another development would further reduce the value of cul-de-sac units for which residents paid a premium. ([DraftOB0038](#))
9. Pedestrian access should not be granted between different housing estates and the Draft LAP does not offer amenities that residents of Stocking Wood could access. Privacy for residents would be compromised if additional pedestrian traffic is allowed. The Stocking Woods residents committee would like to have pedestrian access at each end of Stocking Wood via green areas at Stocking Wood Manor and Stocking Wood Copse. The footpaths in Stocking Wood are owned by the Stocking Wood Management Company Ltd. and there are no plans to hand these over to the County Council. ([DraftOB0038](#))
10. Stocking Wood should not become a porous estate with multiple pedestrian access points but should provide pedestrian access points that benefit existing and future residents. Access points should be provided on either side of Stocking Wood and along routes towards bus stops, the new community centre and school. Pedestrian access arrangements through cul-de-sacs have led to gatherings of teenagers on other estates. ([DraftOB0047](#))
11. Objects to the proposed pedestrian access via Stocking Wood Drive because two pedestrian access points located at either end of the current fence at the rear (Southern end) of the estate should satisfy requirements for pedestrian access. These have the advantage of, on the Copse end, already having a pedestrian access point to the local bus-stop situated between Dal Riada and Stocking Wood. While the pedestrian point at the other end would be the most direct route a person could take if there were any development on the Hill and they wanted to catch the other bus-stop situated between Stocking Wood and Stocking Vale. ([DraftOB0061](#))
12. Strongly against proposals for vehicular and pedestrian access to lands to the south of Stocking Wood via Stocking Wood for the following reasons: - Stocking Wood Drive is not wide enough for two way traffic and there is a risk of damage to parked cars and an increased potential for collision between cars with a reduction in child safety especially in cul-de-sacs. - Traffic and noise pollution in Stocking Wood would increase with the additional access via Stocking Wood Drive and Stocking Wood Copse, which may also lead to an increase in rush hour traffic. - Snow and ice has compacted on roads in Stocking Wood during bad weather periods leading to cars being abandoned on Stocking Avenue. Additional roads joining Stocking Wood Drive and Stocking Wood Copse will increase the volume of abandoned vehicles. - The context in relation to older planning applications/permission for access via Stocking Wood has changed. - Construction traffic using Stocking Wood roads to

gain access to lands would generate large volumes of dirt and noise, affect children's safety and impact on the quality of life for residents. - Extension of Stocking Wood Drive and Copse into another development would further reduce the value of cul-de-sac units for which residents paid a premium. ([DraftOB0125](#))

13. Pedestrian access should not be granted between different housing estates and the Draft LAP does not offer amenities that residents of Stocking Wood could access. Privacy for residents would be compromised if additional pedestrian traffic is allowed. The Stocking Woods residents committee would like to have pedestrian access at each end of Stocking Wood via green areas at Stocking Wood Manor and Stocking Wood Copse. The footpaths in Stocking Wood are owned by the Stocking Wood Management Company Ltd. and there are no plans to hand these over to the County Council. ([DraftOB0125](#))
14. Submission on behalf of landowner (6 ha on western side) states that the isolation of their site in terms of access would be unacceptable. ([DraftOB0146](#))
15. Seeks the realignment and upgrade (footpaths and cycle tracks) of the Ballycullen Road from Gunny Hill to Hunter's Road on the western side only to protect St Colmcille's Well. The section of the Oldcourt Road from the Gunny Hill to the junction of Hunter's Road should be pedestrianised. ([DraftOB0140](#))
16. Submission against access to lands to the rear of Stocking Wood via Stocking Wood estate for reasons of sufficient provision from two of the proposed access roads, the loss of privacy of existing residents because pedestrians can look into kitchens, increased traffic congestion, increased noise and air pollution, children's safety, road safety due to parking arrangement and increased traffic movement, the creation of tension between communities by trying to integrate them and the current road cannot take the volume of traffic during peak times. ([DraftOB0181](#))

## **Response**

### General

The majority of issues categorised under this heading (Integrated Street) objected to the facilitation of pedestrian access to lands to the south of Stocking Wood. Issues raised in relation to the provision of vehicular access via Stocking Wood are addressed under Vehicular Movement (Issues No. 5).

Submissions received in relation to pedestrian movement raise a number of conflicting issues such as those that request that no pedestrian access be provided via Stocking Wood to lands to the south but also request that pedestrian access be provided between Stocking Wood and proposed or existing amenities including bus stops, community facilities, schools and Knocklyon (via Woodstown – established housing estate to north of Stocking Avenue).

### Movement

The Accessibility and Movement Strategy that has been formulated for the Plan Lands sets out to (inter alia) reduce car dependency and the impact of development on traffic volumes by way of providing for convenient and direct pedestrian and cyclist movement between residential development, community facilities, local shopping facilities, schools and public transport (see response to Pedestrian Movement, Cyclist Movement & Universal Access – Issue 3 below).

The Plan's proposal to link existing pedestrian routes complies with the requirements on sustainability, land use and transport planning and street design as set out under Ministerial and Local Authority Guidelines including (inter alia) the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas* (2009), the *Design Manual for Urban Roads and Streets* and *Smarter Travel* (2009).

In response to the perceived potential for increased permeability to reduce safety, research has shown that pedestrian activity helps to activate streets and make them safer by encouraging 'eyes on the street' or active and passive surveillance, reducing vehicular speeds and reducing vehicular trips/movement.

This is further supported by the submission of the National Transport Authority (NTA) on the Draft Local Area Plan, which discourages the provision of physical barriers to pedestrian and cyclist movement between the plan area and surrounding residential developments and states that existing barriers should be removed.

The Stocking Wood pedestrian assess points (Stocking Wood Drive and Stocking Wood Copse) indicated under the Draft Local Area Plan reflect those that are permitted as part of the Stocking Wood Development and those that are reiterated under the planning permission for development on adjoining lands to the south of Stocking Wood. These pedestrian access points are clearly annotated on the permitted layout plans for both developments. It is recommended that an objective be inserted into the Draft Local Area Plan that seeks to ensure that any further temporary cul-de-sacs erected across planned through streets are clearly identified with on-site signage.

#### Gunny Hill Upgrade

Objective SSP38 of the Draft Local Area Plan facilitates the possible reduction of the carriageway width of Ballycullen and Gunny Hill Road to accommodate a footpath and where possible create a revised one way traffic arrangement that would allow for a contra flow cyclist movement. This objective would help to create a safer environment for pedestrian movement in close proximity to the Gunny Hill School Site. It is intended that this upgrade will form part of future planning applications in the area.

#### **Recommendation**

Alter Draft Local Area Plan with an objective (Cul-de-sacs and Gated Estates - Appendix 1) that requires conditions to be attached to any further residential development that proposes a temporary barrier/cul de sac across a planned through street. Such conditions should require the erection of clear signage on all such temporary barriers/cul-de-sacs that communicates the temporary nature of the cul-de-sac/barrier and the planned provision of a through street.

### **3 PEDESTRIAN MOVEMENT, CYCLIST MOVEMENT & UNIVERSAL ACCESS**

#### **Issues Raised**

1. It is noted and welcomed that the plan provides for a network of pedestrian and cycle routes that will link residential blocks with each other, public transport and local shopping while providing routes towards the Dublin Mountains. It should be ensured that houses with no front gardens are not subjected to extra pedestrian traffic. ([DraftOB0024](#))
2. Roundabouts along Stocking Avenue should not be changed to traffic light controlled junctions given that this will cause traffic congestions on a free flowing road. Pedestrian crossings with lights could be placed at strategic locations. ([DraftOB0036](#))
3. The installation of traffic light signals on Stocking Avenue will increase the delay for vehicles exiting Stocking Wood and increase tailbacks in Stocking Wood. ([DraftOB0038](#))
4. Pedestrian and cycle permeability to be extended to include: - Ballycullen Road from Stocking Avenue to Orlagh. - Oldcourt Road between Orlagh and primary school adjacent to Hunterswood - From Tallaght through Oldcourt and up to green beside Stocking Copse - From St. Colmcille's Way across Knocklyon Park towards Stocking Well and Woodstown Abbey. ([DraftOB0056](#))
5. The installation of traffic light signals on Stocking Avenue will increase the delay for vehicles exiting Stocking Wood and increase tailbacks in Stocking Wood. ([DraftOB0125](#))
6. Welcomes the pedestrian walkways proposed in the Plan. ([DraftOB0147](#))
7. The NTA supports Objective AM10 and seeks to collaborate with South Dublin County Council, where funding is available, in order that it is met. ([DraftOB0182](#))
8. The NTA supports Objective AM18 and seeks to collaborate with South Dublin County Council, where funding is available, in order that it is met. ([DraftOB0182](#))
9. The NTA strongly supports Objective AM13 which relates to the no barriers/removal of barriers erected along Main Link Streets. ([DraftOB0182](#))



10. The NTA state that specific laws exist to provide for pedestrian and cyclist priority at crossings and these should be incorporated into the street design policy, e.g. zebra crossings. ([DraftOB0182](#))
11. The NTA recommends that a policy requiring the application of 'Achieving Effective Workplace Travel Plans – Guidance for Local Authorities', be inserted into the Plan. ([DraftOB0182](#))
12. The alignment of the junction at Stocking Avenue and Stocking Lane requires attention as motorists from Stocking Avenue do not realise it is a roundabout until they are already on it. ([DraftOB0141](#))
13. Resident queries the mapping and provision of cycle routes. ([DraftOB0022](#))

## Response

A number of submissions support the Plan's network of pedestrian and cycle routes including the submission from the National Transport Authority, which promotes Objectives AM10, AM13 and AM18 of the Draft Local Area Plan.

The Draft Plan seeks to promote walking, cycling and universal access in accordance with *Smarter Travel* (2009) by setting out a framework of connected streets that will be augmented by pedestrian routes in the form of 'tracks and trails'.

The objectives of the Plan set out to ensure that Plan Lands are permeable to universal movement and access through the provision of streets that are designed to integrate pedestrian, vehicular and cyclist movement. These integrated streets will be augmented with tracks and trails that will permeate the Plan Lands through a series of connected green corridors and spaces.

Objective SSP38 of the Draft Plan sets out to ensure that pedestrian and cycle movement between the eastern and western sides of the Plan Lands is not interrupted by way if facilitating the possible reduction of the carriageway width of Ballycullen and Gunny Hill Road to accommodate a footpath and, where possible, create a revised one way traffic arrangement that would allow for a contra flow cyclist movement. This objective will also help to create a safer environment for pedestrian movement in close proximity to the Gunny Hill School Site and facilitate access between Orlagh and the Plan Lands.

In the context that the majority of the Plan Lands are zoned for residential development, it is accepted that additional development has the potential to generate additional vehicular traffic. The Draft Plan seeks to reduce traffic speeds and volumes by promoting walking and cycling, reducing car dependency, increasing permeability, locating proposed and existing amenities and public transport close to existing and proposed residential dwellings and introducing integrated streets that will fulfil a range of functions (see responses to Vehicular Movement – Issue 5 below).

In the case of existing roads that have a high design speed such as Stocking Avenue and Hunters Road, the Plan seeks to upgrade roundabouts to traffic-light controlled junctions that will prioritise pedestrian and cyclist movement; the Stocking Avenue and Stocking Lane roundabout is one of these identified junctions. This may include for the incorporation of zebra crossings. It is intended that the upgrade of specific roundabouts will include the incorporation of traffic calming devices that signals areas of lower speed thereby creating an environment safe for more vulnerable users. Roundabout upgrades will have to comply with building regulations and the *Design Manual for Urban Roads and Streets* (2013).

Further to the submission of the National Transport Authority to include a policy requiring the application of *Achieving Workplace Travel Plans – Guidelines for Local Authorities* (2012), it is noted that the indicative threshold for a standard workplace travel plan is over 100 persons as recommended by the guidelines. The majority of the Plan Lands are zoned for residential development and this is reflected under the Draft Local Area Plan, which does not include for any commercial or employment development of a scale that would employ over 100 persons. It is

therefore considered that the suggested policy objective would neither be necessary or relevant to the Draft Local Area Plan.

#### **Recommendation**

No alteration(s) to Draft Local Area Plan recommended.

#### **4. PUBLIC TRANSPORT ACCESSIBILITY**

##### **Issues Raised**

1. There is a need for better public transport in the area. ([DraftOB0011](#))
2. It would assist with the flow of traffic if the bus stops on Stocking Avenue were inset to allow traffic to flow smoothly while buses are stopped on the road; this road will become busier once the Plan Lands are built out. ([DraftOB0005](#))
3. The NTA is progressing plans to develop a Bus Rapid Transit network which has yet to be brought to public consultation. One of the proposed route corridors could potentially serve the area covered by the Plan. ([DraftOB0008](#))
4. Bus shelters, bus stops with timetables and extra lighting required along roads. ([DraftOB0019](#))
5. The Plan should ensure that appropriate public transport, bus stops and termini are facilitated. ([DraftOB0024](#))
6. Bus lay-bys should be provided to prevent double parking of busses along Stocking Avenue. ([DraftOB0036](#))
7. Adequate public transport needs to be in place before allowing for the building of housing. ([DraftOB0052](#))
8. Request that the 15 bus terminus is relocated passed the end of Hunter's Road beside the new Lidl store. A stop on Hunter's Road possibly before the Hunter's Crescent roundabout would facilitate residents in the upper Hunterswood area. ([DraftOB0115](#))
9. The Council should provide for a terminus on the Oldcourt Road on the lands opposite the proposed Lidl Store and provide enough capacity to handle the volume of buses on the 15 and 15b routes. ([DraftOB0140](#))
10. A bus terminus site should be allocated and the provision of a terminus/parking bay should be made on the Oldcourt Road opposite the Lidl Store. ([DraftOB0148](#))
11. Bus routes with a terminus should extend the full length of the Oldcourt Road. ([DraftOB0137](#))
12. Would like to see bus route and terminus extended to end of Oldcourt Road. ([DraftOB0138](#))
13. Consideration should be given to the inclusion of a light rail transportation system in the Plan. ([DraftOB0181](#))
14. The plan should provide for a purpose built terminus for the 15 and 15B routes on the Oldcourt Road to allow an adequate number of buses to park there and service the neighbourhood and schools site. ([DraftOB0183](#))

##### **Response**

Public transport services throughout the County are operated by public transport service providers and not South Dublin County Council. Bus services in the area of the Plan Lands are largely under the jurisdiction of Dublin Bus. Changes to bus routes and frequencies are therefore outside the control of South Dublin County Council and the Draft Local Area Plan.

The Draft Local Area Plan notes that the eastern side of the Plan Lands are served by relatively high frequency bus services and the western side of the Plan Lands are not directly served by public transport. It is within this context that the Draft Local Plan sets out to ensure that the Plan Lands are developed to maximise public transport accessibility in order to help sustain, improve and support the viability of bus services.

The Accessibility and Movement Strategy suggests, encourages and demonstrates a possible bus route extension that would serve the undeveloped lands on the western side of the Plan Lands. The operation of buses along the suggested route or beyond the Plan Lands to the western end of Oldcourt Road is a matter for public transport service providers.



Bus lay-bys/termini are proposed under the Draft Local Area Plan at the western side of the Plan Lands near Bohernabreena Road (along proposed Oldcourt Road extension) and within a designated Local Centre off Stocking Avenue on the eastern side of the Plan Lands. Submissions received have suggested the provision of a bus terminus opposite the Discount Foodstore Site, however, such a facility would inhibit the extension of a bus route across the remaining plan lands to the west and south-west. The exact location and provision of bus stops, bus shelters and lighting will be a matter for the detailed consideration at planning application stage.

The National Transport Authority's (NTA) *Greater Dublin Area Draft Transport Strategy 2011-2030* does not include for a light rail transportation route in the area of the Plan Lands and there is no mention of such a route in the NTA's submission on the Draft Plan.

### **Recommendation**

No alteration(s) to Draft Local Area Plan recommended.

## **5 VEHICULAR MOVEMENT**

### **Issues Raised**

1. Resident of Stocking Wood Copse objects to the proposed vehicular access to lands to the south for the following reasons: it would bring more traffic into the area; the roads cannot accommodate additional traffic movements; children's safety. ([DraftOB0007](#))
2. Consideration should be given to providing a right of way from the back of Oldcourt Cottages (in particular from numbers 18 and 18a) onto the new development sites within the Plan. ([DraftOB0015](#))
3. Objects to the proposal to access Plan Lands to the south through Stocking Wood for the following reasons: resident safety, reduced child safety, increased traffic volumes and congestion in Stocking Wood and surrounding area; noise pollution; air pollution during construction work, the inability of the current street system to support existing traffic, local access and residential parking as well as additional traffic; reduced road surface quality within Stocking Wood over time; winter conditions make the streets impassable. ([DraftOB0016](#))
4. Objects to the proposed vehicular access through Stocking Wood for the following reasons: it would contribute to further traffic congestion; road safety; children's safety; the protection of the use of existing open space; existing roads are too narrow to accommodate additional traffic; less accesses are required because there are lower proposed densities; winter conditions make the streets difficult to negotiate, additional traffic will exacerbate this; additional congestion, noise and air pollution and visitor parking from new developments. ([DraftOB0021](#))
5. Concerned that additional dwellings will result in further traffic congestion, in particular along access roads facilitating the M50. A free flow road system onto the M50 is preferred. ([DraftOB0022](#))
6. The inclusion of the permitted vehicular access arrangements via Stocking Wood to lands zoned for residential development to the south is noted. Taking into account the lower density of development proposed for residential development behind Stocking Wood, it is considered that two access roads from Stocking Avenue would be sufficient as opposed to three. ([DraftOB0024](#))
7. Objects to the proposed vehicular access through Stocking Wood for the following reasons: it would contribute to further traffic congestion; increase in noise and air pollution; children's safety; internal streets not designed to accommodate additional traffic and visitor parking; lower proposed densities require less accesses – two vehicular accesses are sufficient; winter conditions make the streets difficult to negotiate - additional traffic will exacerbate this; the nuisance of construction traffic. ([DraftOB0025](#))
8. Additional dwelling housing numbers will increase traffic volumes along routes to Rathfarnham and the M50 – alternative routes should be evaluated including an additional bridge on the M50 from Stocking Avenue. ([DraftOB0025](#))
9. Resident does not wish for road access to further development via Stocking Wood Drive or Stocking Wood Copse on the basis of existing roads not being designed for through traffic and the potential danger posed to children playing on roads. ([DraftOB0032](#))

10. Alternative vehicular routes including an additional bridge on the M50 from Stocking Avenue should be evaluated. ([DraftOB0038](#))
11. The residents of Stocking Wood do not wish to have access roads through existing cul-de-sacs. The replacement of quiet streets with a busy thoroughfare would not be sustainable and would have a detrimental effect of the standard of living. Parents fear for the effects from increased traffic volumes on the safety of their children. ([DraftOB0047](#))
12. Submission against access to lands to the rear of Stocking Wood via Stocking Wood estate for reasons of child safety, congregation of teenagers, increased traffic congestion, snow/ice conditions on hillside, narrow road access for two way traffic, sufficient provision from two of the proposed access roads. ([DraftOB0050](#) [DraftOB0069](#) [DraftOB0070](#) [DraftOB0072](#) [DraftOB0073](#) [DraftOB0075](#) [DraftOB0076](#) [DraftOB0032](#) [DraftOB0077](#) [DraftOB0078](#) [DraftOB0082](#) [DraftOB0083](#) [DraftOB0086](#) [DraftOB0088](#) [DraftOB0090](#) [DraftOB0091](#) [DraftOB0092](#) [DraftOB0093](#) [DraftOB0097](#) [DraftOB0098](#) [DraftOB0101](#) [DraftOB0102](#) [DraftOB0103](#) [DraftOB0104](#) [DraftOB0107](#) [DraftOB0108](#) [DraftOB0119](#) [DraftOB0149](#) [DraftOB0150](#) [DraftOB0151](#) [DraftOB0152](#) [DraftOB0153](#) [DraftOB0155](#) [DraftOB0156](#) [DraftOB0157](#) [DraftOB0163](#) [DraftOB0154](#) [DraftOB0160](#) [DraftOB0161](#) [DraftOB0162](#) [DraftOB0164](#) [DraftOB0165](#) [DraftOB0166](#) [DraftOB0167](#) [DraftOB0165](#) [DraftOB0166](#) [DraftOB0167](#) [DraftOB0168](#) [DraftOB0169](#) [DraftOB0170](#) [DraftOB0171](#) [DraftOB0172](#) [DraftOB0173](#) [DraftOB0174](#) [DraftOB0175](#) [DraftOB0176](#) [DraftOB0177](#) [DraftOB0180](#))
13. The two planned schools are welcomed but are located close together and will cause traffic chaos on the Oldcourt Road and Stocking Avenue. Housing planned near the Bohernabreena Graveyard will add hugely to the traffic at the Allenton/Oldmill crossroads. ([DraftOB0052](#))
14. Stocking Wood should stay as a cul-de-sac estate with permeability via green spaces located either side and access to development behind Stocking Wood via roundabouts at Dalriada and the Neighbourhood Centre. ([DraftOB0056](#))
15. Request that a road be located along the rear boundary of Oldcourt Cottages which would provide access to the lands behind the cottages and facilitate the development of currently landlocked sites. Would prefer that no development take place on the GAA pitches but if it is to take place Oldcourt Cottage sites should be connected to the new development lands. ([DraftOB0059](#))
16. Objects to the proposed vehicular access through Stocking Wood for the following reasons: road safety; children's safety; no capacity for visitor parking and additional cars will impact negatively on pedestrians and motorists; winter conditions make the streets treacherous. ([DraftOB0060](#))
17. Concerned that further development in the area will contribute further to existing traffic congestion and impede access to the M50, to local schools and places of work. The bus service has improved but the buses also get caught up in the congestion experienced in the area. ([DraftOB0060](#))
18. Objects to the proposed vehicular access through Stocking Wood because there are significant numbers of children living in the area, the existing streets act as play space and increased access for cars will create a dangerous environment for children. Furthermore, the proposed access points would be contrary to the Plan's Vision to create 'a place with a strong sense of identity, character and a good quality of life that builds upon and responds to its setting within the foothills of the Dublin mountains and location adjacent to the countryside...' because the accesses do not endow Stocking Wood with a strong sense of identity and character and rather creates the impression that the estate is porous and essentially designed as a conduit to any development on the hill, and not as a destination in its own right. Permeability, a stated ambition within the Report should be considered as subsidiary to the Vision statement above. ([DraftOB0061](#))
19. Measures should be incorporated within the Plan to cope with the additional traffic engendered by the development and the phasing of the development should be co-ordinated with the provision of such measures. ([DraftOB0066](#))
20. Submission from Stocking Wood Resident made on behalf of the Green party notes that the development permitted to the south of Stocking Wood in 2008 (SD07A/1035) provided for 394 dwellings and required 2 access roads including one through Stocking Wood. The LAP indicates 3 access roads to a similar number of residential units and the road through

Stocking Wood should be omitted to demonstrate consistency. The road design in Stocking Wood is limited and was granted in an era of high density development but the LAP proposes to retain the route through Stocking Wood. Access to and from Stocking Wood is already congested and access to the site to the rear would be detrimental to safety including children's safety. It is concluded that the omission of the road will concur with the sustainable development of Stocking Wood. ([DraftOB0113](#))

21. Against the changing of a cul-de-sac to an access road for the following reasons: Children's safety on roads; increased traffic congestion. ([DraftOB0071](#))
22. Against the changing of a cul-de-sac to an access road for the following reasons: Children's safety on roads; increased traffic congestion; winter conditions will block the road. ([DraftOB0074](#))
23. Submission against access to lands to the rear of Stocking Wood via Stocking Wood estate for reasons of child safety, congregation of teenagers, increased traffic congestion, narrow road access for two way traffic, sufficient provision from two of the proposed access roads. ([DraftOB0080](#))
24. Submission against access to lands to the rear of Stocking Wood via Stocking Wood estate for reasons of child safety, congregation of teenagers, increased traffic congestion, snow/ice conditions on hillside, narrow road access for two way traffic, sufficient provision from two of the proposed access roads, air and noise pollution. ([DraftOB0084](#) [DraftOB0085](#))
25. Development would provide an opportunity to allow siblings to build and it is requested that an entrance be provided to rear of Oldcourt Cottages. The Draft plan shows an entrance road running to the rear of the cottages with a green space between the cottages and the new houses. The provision of access to the rear of Oldcourt Cottages should therefore be easy to provide. ([DraftOB0122](#))
26. No access to development should be provided through Oldcourt Cottages or Ely Manor. ([DraftOB0123](#))
27. Traffic generated from the development will cause congestion at the Old Bawn/Firhouse Road junction, Ballycullen/Killininny Road junction and along Stocking Lane. ([DraftOB0123](#))
28. Resident of Stocking Wood with serious concerns in relation turning road into a through route in terms of impact on child safety, suitable/width, impact on on-street parking, loss of turning circle/visitor parking, failure to be informed of previous plans, loss of space for annual street barbeque, use of road for heavy goods and through construction traffic with subsequent damage and dirt to road. ([DraftOB0124](#))
29. Alternative vehicular routes including an additional bridge on the M50 from Stocking Avenue should be evaluated. ([DraftOB0125](#))
30. The main access road through Stocking Wood raises concerns in relation to traffic and child safety. Changing the LAP needs to be considered. ([DraftOB0089](#))
31. Additional development will cause traffic congestion and the LAP needs to be changed. ([DraftOB0090](#))
32. The Plan should consider the installation of '30mph ramps' in 30mph zones over which vehicles can travel at 30mph. ([DraftOB0115](#))
33. Development to the rear of Oldcourt Cottages should include access to the rear of the cottages. ([DraftOB0127](#))
34. Concerned that further development in the area will contribute further to existing traffic congestion and impede access to the M50, to local schools and places of work. The bus service has improved but the buses also get caught up in the congestion experienced in the area. ([DraftOB0116](#))
35. Clarification sought on why the Plan makes provision for three road entrances through the existing football pitches off the Oldcourt Road. Are three roads necessary? ([DraftOB0118](#))
36. Objects to provision of access via Stocking Wood for reason of child safety, increased traffic congestion, snow/ice conditions, narrow roads for two way traffic, damage to rural environment, noise pollution, dangerous conditions for parking, flooding. ([DraftOB0129](#))
37. Development of the Discount Foodstore/new schools area on Oldcourt Road should be well planned for access and transport with no impact on existing estates. ([DraftOB0136](#))
38. Existing roads have deteriorated and should be upgraded to cope with additional volumes. ([DraftOB0137](#))

39. Consideration should be given to the inclusion of a bridge over the M50 to alleviate traffic. ([DraftOB0181](#))
40. Rear access should be allowed for the residents of Oldcourt Cottages onto the Plan Lands. ([DraftOB0181](#))
41. Resident from Bohernabreena Cottage requests improved road access be provided in the Plan. ([DraftOB0181](#))
42. Concerned that pedestrian and vehicular access via the Stocking Wood Estate would create a security risk to their property. ([DraftOB0151](#))
43. Objects to provision of access via Stocking Wood for reason of child safety, increased traffic congestion, snow/ice conditions, narrow roads for two way traffic, damage to rural environment, noise pollution, dangerous conditions for parking, flooding. ([DraftOB0139](#))
44. Request for access to rear of Oldcourt Cottages. ([DraftOB0178](#))
45. Request for access to rear of Oldcourt Cottages. ([DraftOB0179](#))

## **Response**

### General

Submissions received in relation to vehicular movement raise a number of conflicting issues such as those from residents from Stocking Wood that request that traffic congestion be addressed and that convenient access to planned facilities be provided but also request that vehicular permeability through Stocking Wood be limited. Submissions from residents of Oldcourt Cottages request that development to the rear of the cottages be limited or prohibited and raise flooding concerns but also request that access be provided to gardens to the rear of Oldcourt Cottages across a ditch and green buffer in order to improve the development potential of existing rear gardens. The ditch and green buffer forms an integral part of the SUDS and flood management strategy for the Plan Lands.

### Traffic Congestion and Management

The Accessibility and Movement Strategy set out under the Draft Local Area Plan accords with the *Design Manual for Urban Roads and Streets (DMURS)*, which has been published jointly by the Department of Transport, Tourism and Sport and the Department of the Environment, Housing and Local Government (2013).

This strategy sets out to create a permeable grid network and hierarchy of streets across the Plan Lands. This network will provide a choice of routes onto primary or main streets such as Stocking Avenue and Oldcourt Road and allow local trips between neighbourhood blocks and community facilities such as schools and shops that avoid these primary streets. The proposed hierarchal street network avoids the creation of a distributor road and cul de sac network that limits the choice of routes and funnels all trips onto primary streets via a limited number of junctions upon which large housing areas are dependent.

The Draft Plan also further sets out to reduce car dependency and traffic congestion both directly and indirectly by way of reducing permissible housing densities on lands zoned for development compared to those previously permitted in the area by approximately 50%. The Draft Plan promotes cycling and walking at a local level by providing integrated streets for convenient vehicular, pedestrian and cyclist movement and augmenting such with an uninterrupted network of pedestrian and cyclist routes that will link existing and planned housing with schools, community facilities, shops and bus stops. The Draft Plan also sets out to maximise public transport accessibility in order to help sustain, improve and support the viability of bus services.

Suggested hard and soft traffic calming measures for integrated streets as prescribed under the *DMURS* are detailed in Figure 5.5 and Appendix 2 of the Draft Local Area Plan.

A new primary or main street will connect the Oldcourt Road with Bohernabreena Road in accordance with the roads objective of the *South Dublin County Council Development Plan, 2010 – 2016*. This will increase the choice of routes for trips within and outside the Plan Lands.

The provision of a strategic piece of national road infrastructure, which are normally procured by the National Roads Authority, such as a bridge onto or over the M50 would be at variance with the provisions of the County Development Plan and is outside the scope of the Draft Local Area Plan in terms of consistency with the Development Plan and the boundary of Plan Lands.

#### Stocking Wood

Submissions from residents of Stocking Wood object to the inclusion of a vehicular link to lands that are zoned for development to the south of Stocking Wood via Stocking Wood Drive and Stocking Wood Copse for various reasons. The Draft Local Area Plan proposes vehicular access via Stocking Wood Drive only and not via Stocking Wood Copse. The provision of this vehicle link was to accord with the planning permission for Stocking Wood, the planning permission on the lands to the south and the recommendations of the *DMURS* (see above). It was proposed that this integrated Local Link Street would have a speed limit of 30 kph.

The removal of this vehicular link will limit access to lands to the south, limit the choice of routes especially for local trips, increase distances for vehicles to travel (along low speed local link streets) and increase demand on the junctions to the east and west of Stocking Wood including that which currently serves Dalriada.

It is accepted that Stocking Wood has become an established housing area and that the provision of a vehicular access to lands to the south via Stocking Wood Drive would increase traffic through this established residential area. The Draft Local Area Plan should be altered to replace the proposed vehicular link via Stocking Wood Copse with a pedestrian and cyclist link (see response under Integrated Street Network above).

#### Oldcourt Road

It is estimated that there are approximately 5 to 6 garden sites to the rear of Oldcourt Cottages that have potential for additional residential development subject to access and adherence to the requirements of the County Development Plan.

A ditch is located along the rear boundary of Oldcourt Cottages with the Plan Lands and there are variations in levels between and the gardens to Oldcourt Cottages and the Plan Lands. This ditch joins the central branch of the Oldcourt Stream close to where the stream meets a culvert between the Oldcourt Stream and Oldcourt Road on the eastern side of Oldcourt Cottages and western side of GAA pitches. Evidence of extensive flooding around the ditch, the central branch of the stream, the GAA pitches and culvert has been submitted to the Planning Authority.

The Draft Local Area Plan proposes to utilise the ditch and Oldcourt Stream as part of its Sustainable Urban Drainage System and network of swales and attenuation ponds. It is proposed to set the ditch within a green buffer that will help sustain its carrying capacity and frame it within a linear flood management and biodiversity corridor. In response to reports of flooding in the area of Oldcourt Cottages it is also proposed under this Manager's Report to alter flood risk identification maps and identify the central branch of the Oldcourt Stream and adjacent GAA pitches as being at risk of flooding and insert a specific objective to require Site Specific Stage 3 Detailed Flood Risk Assessment to be carried out on these lands (see Items 7, 26 and 31 below).

The provision of access to gardens to the rear of Oldcourt Cottages would require the culverting and levelling of sections of the ditch to the rear of Oldcourt Cottages and the central branch of the Oldcourt Stream together with the fragmentation of the proposed green buffer, open spaces and attenuation ponds to the rear of Oldcourt Cottages. This would reduce the capacity and function of the ditch, stream and SUDS system in an area already subject to an historic flood event while potentially speeding up the flow of water in a manner that would further increase and exacerbate the potential for flooding of the Oldcourt Cottages and new residential development. Such an alteration would be at variance with the Green Infrastructure and Flood Risk Management strategy and objectives of the Draft Local Area Plan, the recommendations of the *Planning*

*System and Flood Risk Management Guidelines (2009) and the Greater Dublin Strategic Drainage Study (2005).*

### **Recommendation**

Alter Draft Local Area Plan (Accessibility and Movement Strategy, Land Use and Density Strategy and Artist's Impression) to replace the proposed vehicular link street to zoned lands to the south of Stocking Wood via Stocking Wood Drive with a pedestrian and cyclist link. Amend Accessibility and Movement Framework (Fig 5.1), Landuse and Density Framework (Fig 5.3) and the Illustrated Layout for the Plan Lands (Fig. 5.6) accordingly.

## **6 CUL-DE-SACS AND GATED ESTATES**

### **Issues Raised**

1. Query if existing cul-de-sacs will remain in place. ([DraftOB0145](#))
2. The NTA request that additional text be added to Section 5.2.7 (Cul-de-Sacs and Gated Estates) stating that physical barriers to pedestrian and cycle movement between the plan area and surrounding residential developments will be removed. ([DraftOB0182](#))

### **Response**

Section 5.2.7 of the Draft Plan states that there may be cases where existing cul-de-sacs and closed-off streets should be upgraded to allow pedestrian and cyclist access where this benefits existing residents by improving access to existing and planned facilities and amenities.

There is no requirement under the drawings included within the Draft Plan (Accessibility and Movement Strategy, Land Use and Density Strategy and Artist's Impression) to open up streets that were planned as cul-de-sacs such as those in the Ely estate and Oldcourt Cottages. Responses to the issues raised in relation to vehicular access through Stocking Wood are dealt with under Vehicular Movement (Item 5) above.

To further clarify this issue, the Draft Local Area Plan should be amended to state that the upgrade of existing streets that were planned as cul-de-sacs could be carried out as part of a permeability project that involves further consultation with local residents and that such projects should not significantly interfere with the SUDS strategy for the Plan Lands. In the context of the submission of the National Transport Authority, this would apply to the opening up of physical barriers to pedestrian and cycle movement.

### **Recommendation**

Amend Section 5.2.7 of the Draft Local Area Plan to state that the upgrade of existing streets that were planned as cul-de-sac could be carried out as part of a permeability project that involves further consultation with local residents and that such projects should not significantly interfere with the SUDS strategy for the Plan Lands.



## **FLOODING ISSUES COLLATED TO CORRESPOND WITH STRUCTURE OF DRAFT LAP**

Many of the issues that have been raised in relation to flooding overlap and are grouped under headings that are most relevant to the Draft Local Area Plan below. In order to avoid repetition, these overlapping issues are followed by grouped responses and recommendations that are structured under a series of sub headings.

### **26 WATER MANAGEMENT AND FLOOD RISK**

#### **Issues Raised**

1. Provide an overview of the Dodder CFRAMS in the context of setting the proposed SUDS measures. ([DraftOB0037](#))
2. Stocking Avenue has flooded during periods of heavy rain despite being a new road and is being used as a terminal by Dublin Bus. This needs to be rectified before any further development. ([DraftOB0045](#))
3. There has been substantial flooding of units in Stocking Well, where residents can no longer gain insurance cover, in Glenvara and Castlefield and along Stocking Avenue leading to the closure of the road. ([DraftOB0038](#))
4. There have been reports of substantial flooding on the ground floors of buildings following heavy rains in the Stocking Wood and Well estates and further afield in Castlefield. ([DraftOB0047](#))
5. The surface water drainage system in Castlefield has failed on four occasions since 2008 (August 2008, September 2008, October 2011, and October 2012). On two of these occasions (August 2008 & October 2011), many properties in Castlefield were destroyed and insurance companies have withdrawn cover. Residents are no longer insured and face the prospect of their properties being destroyed for a third time. An SDCC report carried out after the September 2008 event found that the Ballycullen Stream culvert is badly constructed with varying levels and joints, a badly constructed manhole that restricts flow and pipe drainage gullies that were laid at poor grades. A technical design review carried out by SDCC after the October 2011 event concluded that the existing 1050mm diameter culvert is undersized, has significant inherent design flaws and is poorly installed. Drawing of the culvert indicates that it reduces in diameter as it travels between Woodstown and the Dodder River. The culvert entrance has also been examined by the Castlefield Manor Flood Drainage Committee and this has been found to be in poor condition and of inadequate design. ([DraftOB0068](#))
6. SDCC has designed a drainage solution to resolve the surcharging of water in Castlefield, Glenlyon and Glenvara which involves the installation of a 1350 mm diameter pipe that would be routed adjacent to Castlefield parallel to the M50. It is understood that this proposal was submitted to the OPW and funding was rejected. The Castlefield Manor Flood Drainage Committee would like to know why the drainage proposal is no longer being considered. ([DraftOB0068](#))
7. Two areas zoned for residential development appear to be partially in the flood zone identified under the Flood Risk Assessment in the SEA. This requires some clarity as residential uses are indicated as being vulnerable under the Planning System and Flood Risk Management Guidelines. ([DraftOB0064](#))
8. There has been substantial flooding of units in Stocking Well, where residents can no longer gain insurance cover, in Glenvara and Castlefield and along Stocking Avenue leading to the closure of the road. ([DraftOB0125](#))
9. Additional development to the south of Stocking Wood would increase surface water run-off and it is requested that no development takes place to the south of Stocking Wood and should only take place on either side of Stocking Wood. ([DraftOB0125](#))
10. Request that the historical and ongoing problem of flooding at no.157 Old Court Road and the nearby GAA pitches be recorded. The source has been traced to a stream that flows down from Oldcourt Hill Road and is culverted under the Oldcourt road opposite Beechdale. In times of very heavy rainfall the culvert is unable to take the volume of water, which then cascades down the road to no. 157. In addition the pitches of Ballyboden St. Enda's GAA club also floods. Concerns raised that the building of houses on this site would lead to the flooding of these properties. ([DraftOB0159](#))

11. There are sections of the Stocking Wood Estate where flood water has in the past become trapped and flooding has resulted. Reassurance is needed that if the primary flood relief measures fail that a secondary source of relief be put in place. ([DraftOB0181](#))
12. Flooding of main road during the summer blocked access for a number of hours. ([DraftOB0177](#))
13. A Summary Local Area Report from the Natural Flood Mapping Website, which details flood events and reports in the area, is attached. ([DraftOB0187](#))

## **7 WATERCOURSES AND WATER MANAGEMENT**

### **Issues**

1. Water Management and Flood Risks issues identified under Section 3.3.5 are noted together with SUDS proposals outlined in Section 4.4.2 and Figure 5.2. Any SUDS proposals should not interfere with the current drainage regime of the M50 and should be sited and designed so as not to impact on the operation of the strategic national road network. ([DraftOB0023](#))
2. Water courses should be managed to ensure that lands are not subject to future flooding including low lying lands that are prone to flooding. ([DraftOB0024](#))
3. Consideration should be taken of surface water issues and provision should be made for removing surface water from the Plan Lands. Existing water courses should be included within the Plan and building works around them should be managed appropriately to prevent future flooding. ([DraftOB0025](#))
4. Drainage from new development lands should not rely or use the culvert to the rear of Oldcourt Cottages and the Ely Housing Estate, which replaced an existing drainage ditch with subsequent flooding preventing residents from being able to insure their homes. ([DraftOB0036](#))
5. Development to the south of Stocking Wood should make provision for removing surface water and additional land retaining measures together with measures to stop subsidence. Building work around water courses need to be carefully managed so that flooding does not occur. ([DraftOB0038](#))
6. Additional development to the south of Stocking Wood would increase surface water run-off and it is requested that no development takes place to the south of Stocking Wood and should only take place on either side of Stocking Wood. ([DraftOB0038](#))
7. The LAP must address drainage issues that have arisen in the vicinity of Stocking Wood including Glenlyon, Glenvara and Castlefield. The plan should include a major new drainage project that will bring surface water away from the area. ([DraftOB0056](#))
8. It is understood that the LAP includes a planned attenuation pond located towards Stocking Wood, which will be designed to temporarily contain excess water during periods of heavy rainfall. It is considered that the pond will be unable to serve the Ballycullen Stream and will not solve the local problem in Castlefield. ([DraftOB0068](#))
9. Objects to further development taking place on lands to the south of Stocking Wood because of the potential for increased flooding. ([DraftOB0060](#))
10. Development to the south of Stocking Wood should make provision for removing surface water and additional land retaining measures together with measures to stop subsidence. Building work around water courses need to be carefully managed so that flooding does not occur. ([DraftOB0125](#))
11. Resident is concerned that further development would contribute to water run-off and flooding which would affect house insurance in the area. ([DraftOB0115](#))
12. Query regarding water features indicated on maps and whether or not they are for illustrative purposes. ([DraftOB0145](#))
13. Would like reassurance that drainage will be addressed. South Dublin County Council will be held responsible should existing houses flood following the construction of houses on a flood plain. ([DraftOB0135](#))
14. The Plan should address the locations of attenuation ponds as a solution to flooding problems in the area and consideration should be given to the installation of a 1350mm diameter pipe to connect with the existing 1500mm diameter pipe to alleviate Castlefield flooding concerns. ([DraftOB0181](#))



15. The planned wetland area is welcomed, but the water emanating from rainfall will add too much pressure on the Ballycullen Stream and have a huge effect on houses lower down in Firhouse, particularly around the Castlefield area. The existing culvert at this location cannot cope; this issue needs to be addressed. ([DraftOB0183](#))
16. Welcomes inclusion of biodiversity network, green infrastructure and 10 meter buffer zone for streams. Landscaping in buffer zone should be undertaken with input from an ecologist and should consist of native species. ([DraftOB0184](#))
17. Consideration should be given to a 10 meter wide strip for rivers or drainage channels in the area and this strip should be accessible mechanical plant and should not be landscapes, paved or otherwise developed in a manner that would prevent access. Bridges or culverting of channels will require consent from the OPW. ([DraftOB0187](#))

### **31 FLOOD RISK MANAGEMENT**

#### **Issues Raised**

1. The Council should liaise with the OPW and insure that residential development is not within a flood zone. Where any residential development is permitted under its zoning objective and located in a flood zone A or B, the relevant policies and findings of the Justification Test in the Flood Risk Management Guidelines must be applied. ([DraftOB0064](#))
2. Under 'The Planning System and Flood Risk Management Guidelines for Planning Authorities', planning authorities are required to incorporate flood risk management as a key consideration in the preparation of local areas plans. The Justification Test has been designed to assess the appropriateness of developments being considered in areas of moderate or high flood risk. The guidelines place a firm onus on the Authority to follow the hierarchical order of avoid, substitute, justify, mitigate and (where the Justification Test has been passed) manage flood risks. ([DraftOB0133](#))
3. OPW welcomes South Dublin County Council's commitment to adhere to the 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' and the inclusion of a Strategic Flood Risk Assessment. The SFRA indicates two areas at risk of flooding and flood extent maps indicate that parts of these lands are within flood zone A and B. If the planning authority is considering proposals to change these parcels of land from open space to residential development, the planning authority will need to complete a justification test for the area and be satisfied that such development adheres to the Justification Test for Development Plans with evidence of such included in the SFRA. Should the Justification Test be passed any development in the area should be subject to a site specific flood risk assessment. ([DraftOB0133](#))

### **GROUPED RESPONSE - WATER COURSES AND WATER MANAGEMENT / FLOOD RISK AND FLOOD RISK MANAGEMENT**

#### General

An Initial Strategic Flood Risk Assessment (SFRA) of the Ballycullen Oldcourt Local Area Plan (LAP) was undertaken by South Dublin County Council in parallel to the production of the LAP. This assessment is a requirement for Local Area Plans as set out in *The Planning System and Flood Risk Management – Guidelines for Planning Authorities* (2009). The SFRA on the Draft Plan reviews the requirements of the Guidelines, the existing policies of the Regional Authority and *South Dublin County Council Development Plan 2010 – 2016*. All available information on the potential Flood Risk i.e. the OPW's Preliminary Flood Risk Assessment modelling, stream catchments, flooding events and site walk-through are outlined. Local area flood reports available on the OPW's National Flood Mapping website have also been reviewed. All of this information was utilised by the LAP team in drawing up a Sustainable Urban Drainage strategy for the plan lands and in formulating a series of objectives that are embedded within the LAP.

The Initial SFRA has been updated to incorporate information in relation to flooding events following the public consultation including additional recommended objectives.

### Dodder CFRAMS

An overview of the Dodder Catchment Flood Risk and Management Study (CFRAMS) is provided under the Initial Strategic Flood Risk Assessment of the Draft Ballycullen – Oldcourt LAP.

### SUDS Strategy

The SUDS strategy for the Plan Lands sets out to ensure that all surface water generated within and above the Plan Lands is managed on-site through a SUDS network that will intercept, slow down and absorb surface water before any release into existing downstream drainage systems. This will help to minimise flood risk and the discharge of additional surface water to existing drainage systems including those that serve the M50.

The utilisation of existing watercourses and ditches to manage water flows forms an integral part of the proposed SUDS network on the eastern and western sides of the Plan Lands and will involve incorporating all existing open branches of the Woodstown and Oldcourt Streams. These streams will be supported and augmented by grassed swales and attenuation ponds that will further help to intercept surface water. The dimensions of any attenuation ponds will be determined by the extent of volume required as established at planning application and engineering detail stage.

The SUDS strategy will help minimise the flood risk generated by development on the Plan Lands and attenuate surface water that originates upstream. Therefore the Draft LAP SUDS strategy minimises the potential for increased flood risk in existing residential areas including those within and downstream of the Plan Lands.

Only a short section of the Ballycullen Stream (approx. 500 meters) runs through the Plan Lands and approximately 70% of this section has been culverted beneath Stocking Avenue and Dalriada thus severely reducing the scope for integrating the stream into the SUDS strategy. See further response below.

### Treatment of Streams and SUDS Elements

It is a requirement of the Draft LAP to prohibit the culverting of watercourses and require structures adjacent to watercourses to be setback a minimum distance of 10 metres from the top of the bank with landscaping that will aid in the absorption of storm water flows.

It is recommended that the Draft Plan be strengthened to include an objective that requires the attachment of conditions to permissions that would require all existing and proposed ditches, culverts and SUDS elements to be cleared (in a manner that is in accordance with best ecological practise to protecting Flora and Fauna) and kept free of debris, waste and building rubble before, during and after construction. This will help ensure that the capacity of existing streams, ditches and proposed SUDS elements are not reduced by building works or blockages.

### Ballycullen Stream

A 500 metre section of the Ballycullen Stream flows through the eastern side of the Plan Lands upstream of the residential areas that have experienced flooding (see Castlefield, Glenvara, Homeville Flooding response below). Approximately 350 metres of this stream that runs through the Plan Lands has already been culverted beneath undeveloped land, Stocking Avenue and the partially completed Dalriada housing development leaving approximately 150 metres of open stream within the Plan Lands.

Approximately 14 hectares of undeveloped lands within the Plan Lands (11%) are located within the catchment of the Ballycullen Stream; the majority of which are subject to extant planning permissions for medium density development. The Draft Local Area Plan suggests a lower density development (approximately 260 dwellings) set amongst an open space network that will occupy 20% - 30% of the lands and accommodate SUDS features including wet ditches, swales and attenuation ponds. It will be a requirement for all development permitted under the Draft Local Area Plan to integrate with the SUDS network and augment this with components that will

further minimise on-site run-off such as porous grass paviers, soakways and rainwater harvesters. This will help ensure that development of the Plan Lands does not further contribute to storm water flows that drain via the Ballycullen Stream.

Further to this, it is recommended Section 5.3.2 of the Draft LAP (Water Courses and Water Management) be altered to require any development proposed within the catchment of the Ballycullen Stream to demonstrate that the majority of surface water generated by the development will be dealt with on-site and that any additional run-off will be directed to a surface water drainage system outside of the Ballycullen Stream catchment. If it is proposed to discharge surface water via the private drainage system that serves Stocking Avenue and Stocking Wood to the east of the Ballycullen Road, this shall be accompanied by documentation that demonstrates consent to access and utilise the private drainage system. No development that proposes to discharge additional surface water run-off to the Ballycullen Stream shall occur until such time as an appropriate Ballycullen Stream Flood Alleviation Scheme is in place.

Such alterations should be accompanied by a map that illustrates the extent of the catchment of the stream.

It is also recommended that the Draft Local Area Plan be altered to incorporate 8.5 hectares of lands zoned for open space (objective F under County Development Plan) around Saint Colmcille's Well in LAP drawings (Green Infrastructure Strategy, Land Use and Density and Artists' impression). This will provide a potential opportunity to include an attenuation area within the rural and upper catchment of the Ballycullen Stream that will help intercept and absorb storm water flows from an open section of the stream before it reaches the problematic culverted sections of the stream.

#### Areas of Potential Flood Risk

The two areas of potential flood risk identified in the Draft LAP, the accompanying SEA Environmental Report and the Initial Strategic Flood Risk Assessment relate to lands along the Oldcourt Stream and Ballycullen Stream that the OPW has identified under its Preliminary Flood Risk Assessment Modelling for 100 year events.

These lands are zoned under the current County Development Plan for new residential development subject to approved area plans having been initially zoned under the 1998 and the 2004 County Development Plans. These lands have subsequently been included in the Draft Local Area Plan and identified as being at flood risk. Further to the SUDS strategy for the Plan Lands, see above, Objective G17 of the Draft Local Area Plan requires all planning applications in areas at risk of potential flooding to be accompanied by a Flood Risk Assessment carried out at site specific level in accordance with *The Planning System and Flood Risk Management – Guidelines for Planning Authorities* (2009). Further details in relation to Flood Risk Assessment are provided in response to issues on Zoned Lands at Flood Risk and the Sequential Approach below.

#### Flooding of Oldcourt Road & GAA Pitches

Additional lands that are at risk of flooding have been identified through the public consultation process for the Draft Local Area Plan. Discussions with local residents and submissions have raised concerns in relation to the occurrence of historic flood events to the rear of Oldcourt Cottages. This includes the submission of photographic evidence of extensive flooding of the GAA pitches off the Oldcourt Road, which appears to emanate from the central branch of the Oldcourt Stream that meets a culvert with the Oldcourt Road on the western side of the pitches.

Further evidence submitted in relation to flooding along the eastern branch of the Oldcourt Stream and Oldcourt Lane relates to an area of the Plan Lands that has already been identified as one of the areas at risk of a 1% of 100 year flood event (using OPW data) on Figure 3.1 of the Draft Plan. This again relates to a section of the Oldcourt Stream (eastern branch) that meets a

culvert where a private driveway and Oldcourt Lane meet close to the junction between Oldcourt Lane and Oldcourt Road.

It is recommended that the Draft Local Area Plan be altered to identify the GAA pitches and adjacent section of Oldcourt Road as being at risk of flooding. It should be indicated that the source data for such flood potential derives from evidence of an extensive flood event submitted during the public consultation process and subsequent site visits.

#### Castlefield, Glenvara, Homeville Flooding

There is an existing downstream surface water issue in the Ballycullen Stream catchment, with four recorded events since 2008. This is reported to be due to the Ballycullen Stream being culverted into an inadequately sized pipe downstream in the existing estates (Castlefield Manor, Glenlyon and Glenvara) located north of St. Colmcille's Way (M50 Scholarstown junction access road) that were granted planning permission up to 1990.

The issue appears to arise as a result of subsequent development in the catchment further to the south, i.e. post 1990 permissions (Daletree - 1992/93, Woodstown - Material Contravention 1995, Hunterswood - 2000). The last piece of development within the catchment comprised the Dalriada residential development, which is only part constructed (2003/06 permissions, updated in 2013). The most recent 2013 Dalriada permission requires surface water from the southernmost zoned lands within the catchment to be diverted towards the M50, in recognition of the pipe constraint issue.

A solution to the downstream issue was identified and costed by SDCC in 2012 and requires a larger, duplicate surface water pipe to be laid. In July 2013 the OPW declined to fund this proposal but follow up discussions between the Council and the OPW to secure a solution are ongoing.

As discussed above (Ballycullen Stream), there is a possibility of intercepting/diverting peak flows on the Ballycullen Stream south of the developed lands by using and incorporating lands zoned for open space as storage.

#### Stocking Avenue

Flooding has occurred on the eastern side of Stocking Avenue where there is a drop in road levels. These events were raised during the public consultation process.

The flood water is considered to have emanated locally from lands that have been partially levelled on the southern and elevated side of Stocking Avenue. Remedial works have since been carried out by the Environmental Services Department in the form of a new drain and connection to the surface water drainage system.

#### Stocking Well

The flooding of dwellings in Stocking Well has also been raised under the public consultation process. The flooding of these dwellings related to the discharge of surface water from unused connections into the foul drain system developed as part of the partially completed Stocking Wood and Stocking Well estates. The Council's Environmental Services Department has since sealed manholes and blocked unused connections to the foul sewer in Stocking Well.

#### Zoned Lands at Flood Risk

Further to the submission of the OPW and the responses to the Development Plan Zoning of Plan Lands, South Dublin County Council is not proposing to change the zoning of undeveloped lands within the boundary of the Plan Lands. These lands are already zoned as 'Objective A1' (To provide for new residential communities in accordance with approved action plans) under the current County Development Plan 2010 – 2016.

While it is uncertain whether or not those areas which are identified as moderate to high risk of flooding (based on the OPW preliminary Flood Risk Assessment PFRA) or the GAA lands where flooding has already occurred would pass the Plan Justification Test (the uncertainty arises over the possibility that the flooding on the Oldcourt GAA pitches and households adjoining was caused by either the blockage or inadequate size of adjoining culverts), it is not possible to rezone or downzone land under the local area plan process as this can only happen as part of the County Development Plan process. The approach proposed by the County Council is precautionary and involves the designation of particular zones that will require Site Specific Stage 3 Detailed Flood Risk Assessment including the likely impact of any displaced flood water on third parties. If it cannot be demonstrated that both the actual and residual flooding issues can be dealt with in an acceptable manner including the impact of any displaced flood water on third parties, then it is recommended that the development of these lands shall be confined to water compatible development only (in accordance with the precautionary approach), i.e. amenity space, outdoor sports and recreation etc.

#### Sequential Approach

Section 5.3.2 of the Draft Local Area Plan requires a balanced and risk-based sequential approach to be adopted when assessing development proposals in areas identified as being at risk of flooding. It is stated that this should include the application of the 'Justification Test' in accordance with policies of the County Development Plan on Flood Risk identification, which have been adopted in accordance with the requirements of the *Flood Risk Management Guidelines*.

The sequential approach will apply to the lands already identified as being at flood risk using OPW data and the additional lands that have been identified to have a flood risk potential under the draft public consultation process (subsequent to their inclusion in the Draft Local Area Plan as an alteration).

This requirement is furthered by Objective GI7 of the Draft Local Areas Plan, which states that all planning applications for development in areas at risk of flooding shall be accompanied by a Flood Risk Assessment carried out at site-specific level in accordance with the Flood Risk Management Guidelines depending on the type and scale of development and the sensitivity of the area.

It is recommended that Section 5.3.2 of the Draft Local Area Plan be altered to clarify that the sequential approach sets out to avoid, substitute, justify, mitigate and (where the Justification Test has been passed) manage flood risks. Objective GI7 should also be altered to clarify that site-specific flood risk assessment will entail Stage 3 Detailed Risk Assessment as prescribed under the Flood Risk Management Guidelines and that where avoidance of flood risk is not possible, vulnerable uses such as residential, community and commercial uses should be substituted with less vulnerable uses such as parks and open spaces with SUDS features that integrate with the SUDS strategy for the Plan Lands.

### **Recommendations**

#### General

- Alter the Green Infrastructure Strategy Objectives of the Draft Plan (Appendix 1) to require attachment of conditions to permissions that would require all existing and proposed ditches, culverts and SUDS elements to be cleared (in a manner that is in accordance with best ecological practise to protecting Flora and Fauna) and kept free of debris, waste and building rubble before, during and after construction.

#### Ballycullen Stream Catchment

- Alter Draft Local Area Plan in a manner that requires any development proposed within the catchment of the Ballycullen Stream to demonstrate that the majority of surface water generated by the development will be dealt with on-site and that any additional run-off will be directed to a surface water drainage system outside of the Ballycullen Stream catchment. If it

is proposed to discharge surface water via the private drainage system that serves Stocking Avenue and Stocking Wood to the east of the Ballycullen Road, this shall be accompanied by documentation that demonstrates consent to access and utilise the private drainage system. No development that proposes to discharge additional surface water run-off to the Ballycullen Stream shall occur until such time as an appropriate Ballycullen Stream Flood Alleviation scheme is in place.

- Include a map that illustrates the extent of the catchment of the Ballycullen Stream.
- Incorporate 8.5 hectares of lands zoned for open space (objective F under County Development Plan) around Saint Colmcille's Well in LAP drawings (Green Infrastructure Strategy, Land Use and Density and Artists' impression) to accommodate a possible attenuation area that will help intercept and absorb storm water flows from the upper catchment of the Ballycullen Stream.

#### Sequential Approach

- Alter Section 5.3.2 of the Draft Local Area Plan to clarify that the sequential approach sets out to avoid, substitute, justify, mitigate and (where the Justification Test has been passed) manage flood risks.
- Alter Objective GI7 of the Draft Local Area Plan to state that site specific flood risk assessment of lands identified as being at risk of flooding will entail Stage 3 Detailed Risk Assessment and, where avoidance of flood risk is not possible, vulnerable uses such as residential, community and commercial uses should be substituted with less vulnerable uses such as parks and open spaces.
- Alter Green Infrastructure Strategy map (Figure 5.2), the Overall Strategy Map (Figure 5.3) and the Illustrated Layout/Artist's Impression (Figure 5.6) to identify the area around the location of the existing Oldcourt GAA pitches and the areas identified by the OPW's PFRA maps as being at potential risk of flooding for Stage 3 Flood Risk Assessment.

#### Oldcourt Lands

- Alter Flood Risk identification maps and data (Figure 3.1 - existing Green Infrastructures and Section 3.3.5 – Water Management and Flood Risk) to identify the central branch of the Oldcourt stream that traverses the Plan Lands and adjacent GAA pitches as being at risk of flooding.
- Alter Section 3.3.5 of the Draft Plan (Water Management and Flood Risk) to state that the source data for identifying the GAA pitches as being at flood risk derives from evidence of an extensive flood event submitted during the public consultation process and subsequent site visits by Council staff. It should also be indicated that evidence of flooding at the junction of Oldcourt Lane and Oldcourt Road coincides with an area of flood risk identified under the OPW preliminary flood risk data and that both reported flood events have occurred in areas where branches of the Oldcourt Stream meet culverts.
- Insert a specific objective and map into Appendix 1 (specific objectives) that identifies the area of potential flood risk around the existing Oldcourt GAA pitches and requires any proposed development that is potentially sensitive to flooding to be subject to the sequential approach of avoid, substitute, justify, mitigate and (where the Justification Test has been passed) manage flood risks in accordance with *The Planning System and Flood Risk Management– Guidelines for Planning Authorities* (2009). These areas will require Site Specific Stage 3 Detailed Flood Risk Assessment including the likely impact of any displaced flood water on third parties. Include a requirement that if it cannot be demonstrated that both the actual and residual flooding issues can be dealt with in an acceptable manner including the impact of any displaced flood water on third parties, then the development of these lands shall be confined to water compatible development only (in accordance with the precautionary approach) such as amenity spaces, outdoor sports and recreation spaces that include SUDS elements and integrate with the SUDS strategy for the Plan Lands.

## **8 Protection and Incorporation of Natural Heritage Issues Raised**

1. Describe the measures proposed to protect areas of landscape character value and measures for the control of invasive species. Consult with the NPWS in relation to the proposed ecological buffer zones. ([DraftOB0037](#))
2. Existing hedgerows, ditches and trees lines need to be protected and the plan should include for the retention of all such boundaries with Oldcourt Cottages and in surrounding areas. ([DraftOB0036](#))
3. The area's flora and fauna including hedgerows should be kept and maintained including boundaries between the Oldcourt Cottages and the Plan Lands. ([DraftOB0042](#))
4. Wildlife corridors and hedgerows should be preserved. Issues raised in relation flooding, environmental erosion and reduced quality of life. ([DraftOB0123](#))
5. Wildlife and hedgerows should be retained. Resident is concerned that further development will drive animals away from the area and further up into the mountain. ([DraftOB0115](#))
6. Development on the Plan Lands will have a negative impact on local wildlife, in particular on bats, frogs and newts. ([DraftOB0119](#))
7. Submission on behalf of landowner on western side of Plan Lands advises that the proposal to create a green infrastructure network may restrict the delivery of an appropriate density of development on certain parcels of land. It may not be feasible for development proposals to maintain existing hedgerows and field boundaries. It is requested that Objective GI12 be amended to allow flexibility in terms of the provision of access, permeability, connectivity and delivery of open spaces. ([DraftOB0131](#))
8. Submission on behalf of landowner on western side of Plan Lands considers that the minimum required width of 15 metres for green corridors and wetland areas as prescribed under Objective GI11 is excessive and that this minimum requirement should be reduced to 10 meters. ([DraftOB0131](#))
9. During the planning and construction stages all efforts should be made to protect and prevent the erosion of the mature trees, hedgerows and streams. ([DraftOB0143](#))

### **Responses**

The County Development Plan and the Draft Local Area Plan's Green Infrastructure Strategy recognises that the conservation of existing flora and fauna is a central element in the preservation of the natural heritage and also recognises its importance to the achievement of sustainability. The Development Plan sets out to ensure that the Council will endeavour to prevent the loss of woodlands, hedgerows, aquatic habitats and wetlands in conjunction with other agencies to include for a programme to monitor and restrict the spread of invasive species. Development proposals within the Plan Lands are bound by the policies contained within the County Development Plan in addition to the objectives contained in the LAP.

The Local Area Plan seeks to create a green infrastructure network of high quality/amenity green routes and surface water attenuation areas that will permeate the lands and utilise elements of heritage and potential biodiversity value. Objective GI12 specifically states that historic field, townland and parish delineations including their associated hedgerows and ditches will be protected and enhanced. Objectives GI10, GI11, GI12, GI13 and GI15 seek to secure the protection of existing biodiversity corridors such as hedgerows, ditches, streams and wildlife corridors. Furthermore, the proposed Land Use Framework Plan, has been constructed around these existing biodiversity corridors; incorporating them fully within the overall design structure. The existing field pattern and hedgerows have influenced the layout of development on the site. The existing wildlife/biodiversity corridors will therefore continue to connect other such corridors and habitats within the Dublin Mountains. The provision of additional attenuation ponds and ditches, with the augmentation of existing hedgerows and ditches, will help mitigate the impact of development on the natural heritage of the area.

It is a policy of the South Dublin County Council Development Plan 2010-2016 (Policy LHA21) to *'dedicate a minimum of 10m each side of the waters edge for amenity, biodiversity and walkway purposes, where practical. This may be increased depending on the size of the watercourse and*

*any particular circumstances*'. Objective GI15 of the proposed LAP incorporates this policy. Within the context of recent flooding events downstream of the Plan Lands, all surface water generated within and above these lands should be managed on site. The existing ditches and field systems will be augmented with increased planting and widening/extension of ditches to mitigate the affects of development through the management surface water. The requirement to maintain a minimum separation distance of 10 metres (from the top of the bank) between streams and development combined with the required minimum width of 15 metres for green corridors and wetland areas are essential facets of the biodiversity and flood risk management measures contained within the Plan.

It is envisaged that these are minimum requirements, where possible and practicable, will be exceeded at planning application stage. Flexibility can be found in Objective GI14 of the Draft LAP, which states that limited sections of field boundaries may be altered where a need has been clearly demonstrated on the basis of accessibility.

### **Recommendation**

No alteration(s) to Draft Local Area Plan recommended.

## **9 TRACKS AND TRAILS**

### **Issues Raised**

1. Welcomes the provision of a green buffer. Would like to see tracks and trails that link to the Hellfire Club and Dublin Mountain Way for use by Walkers and Cyclists. ([DraftOB0005](#))
2. In considering additional connections to the Dublin Hills it should be ensured that appropriate mitigation measures are incorporated to protect designated habitats and species. Sympathetic lighting should be considered for walking and cycling routes to minimise disturbance to bats/other mammals and the potential effects on habitats and species should be assessed. ([DraftOB0037](#))
3. Planned tracks and trails should be well lit. ([DraftOB0123](#))
4. Supports proposed tracks and trails linking residential areas to the mountain open spaces. ([DraftOB0137](#))

### **Response**

The boundary of Plan Lands is limited to lands that are zoned for new residential communities (subject to approved area plans) and adjoining lands that are relevant to such development (see response to Item 23 – Lands, structures or issues outside remit of Plan). The Plan Lands therefore do not incorporate areas such as the Hell Fire Club, Orlagh House or Carthy's Castle.

The Tracks and Trails section of the Draft Local Area Plan requires the provision of open ended pedestrian and cycle paths that will permeate the Plan Lands. Some of these tracks and trails will cross and link with existing pathways/roads in the area (such as Gunny Hill), which already connect with historic structures and places in the Dublin Mountains, such as Carthy's Castle, Saint Colmcille's Well and the Hell Fire Club. The Plan Lands will thereby be linked indirectly with the Dublin Mountains.

The standards section of the Local Area Plan (Appendix 2 – Street Furniture and Lighting) states lighting should be sensitively designed to ensure that pedestrian and cycle paths are well lit. This includes for tracks and trails. It is also stated that due regard should be had to the impact of lighting on foraging routes for bats and bat roosts in particular and that planning applications for development in the vicinity of bat roosts and flight and feeding paths shall be accompanied by a specialised lighting strategy and design details that demonstrate mitigations measures. These issues will be assessed in a detailed manner at planning application stage.

Whilst the above is considered sufficient to introduce mitigation measures to protect designated habitats and species, it is recommended that the Tracks and Trails sections of the Plan (Section 5.3.4 and Appendix 1 – Plan Objectives) be altered to highlight the importance of protecting



species and their habitats and the importance of introducing mitigating measures to protect them through sensitive design, lighting and construction methods.

### **Recommendation**

Alter the Tracks and Trails sections of the Draft Local Area Plan (5.3.4 and Appendix 1 – Plan Objectives) to highlight the importance of protecting flora and fauna including habitats and the introduction of mitigating measures to protect ecosystems through the sensitive design, lighting and construction of tracks and trails with reference to the requirements of the standards section of the Draft Local Area Plan.

## **10 Green Buffers to Mountains and M50**

### **Issues Raised**

1. The incorporation of green infrastructure features that limit the impact of noise from the M50 on future development are noted and welcomed. Any noise sensitive development in proximity to a planned or existing national road should identify and implement noise mitigation measure where warranted and the cost of such should be borne by the applicant/developer. ([DraftOB0023](#))
2. It is essential to put a greenbelt in place in order to create a permanent barrier to further development on the mountainside. ([DraftOB0032](#))
3. There should be a greenbelt that provides a permanent barrier to future development on the mountainside with few public walkways/links to the hellfire club in order to prevent access for mountain biking, trial bikes and quad biking at night. ([DraftOB0042](#))
4. Support given for the buffer zones between the different areas at the upper edge against the foothills of the Dublin Mountains. ([DraftOB0066](#))
5. Agrees with provision of permanent green space on hillside where no further development will be allowed. ([DraftOB0136](#))
6. Resident queries the features that will be put in place to limit noise from the M50. ([DraftOB0022](#))

### **Responses**

Part of the Local Area Plan strategy to soften the transition between development and the countryside includes for the creation of a continuous green buffer between the Upper Slopes of the Plan Lands and the mountains. The Plan also seeks to create a green buffer and wetland area, with soft landscaping and berms, along the boundary with the M50 in order to help protect future residential amenity from excessive noise.

Both green buffers will accommodate biodiversity corridors, SUDS features and tracks and trails. These will link towards existing pathways/roads including those that provide access towards the Hellfire Club and Dublin Mountain Way.

It is intended that all green buffers and their components including noise mitigating measures will be provided as part of the open space requirement for developments across the Plan Lands and the cost and construction of these components will therefore be borne by developers. Further to the submission of the NRA, it is recommended that the Draft Local Area Plan be amended to clarify this.

### **Recommendation**

Alter Section 5.3.6 of the Draft Local Area Plan (Green Buffers to M50 and Mountains) to clarify that the costs and construction of all planned green buffers and their components including noise mitigating measures, SUDS features and tracks and trails will be borne by developers.

## **11 OPEN SPACE HIERARCHY & FUNCTIONS**

### **Issues Raised**

1. No provision has been made for children's play facilities within the proposed parks outlined in the Plan, in particular within Knocklyon Park. Parks should be reliably accessible to all residents and not just to sports clubs and should contain children's play facilities. ([DraftOB0005](#))
2. Green space should be provided to encourage healthy living. ([DraftOB0021](#))
3. Due to the close proximity to the Dublin Mountains, the quantum of designated open space should be greater than that required under the County Development Plan. ([DraftOB0024](#))
4. The land beside Stocking Well should be developed into a park and within walking distance of Stocking Wood residents. ([DraftOB0025](#))
5. There is a need to place more emphasis on recreational facilities for families and sports including cycleways and tracks and trails. This needs to be rectified before any further development. ([DraftOB0045](#))
6. The Local Area Plan should provide local amenities that residents can walk to rather than drive to and the lands beside Stocking Well should be developed into a park. The community centre proposed in the plan should be built within an open space. ([DraftOB0038](#))
7. There are no central parks, green spaces or children's playground in the plan. ([DraftOB0052](#))
8. The 15 meter wide strip to the mountains should be extended and the Council has the opportunity to create a public park that links Oldcourt, Ballycullen and Hellfire Club. ([DraftOB0056](#))
9. Consideration should be given to the provision of allotments and a continuous green space should be provided between Ballycragh Park and Montpellier Hill with a children's playground. ([DraftOB0056](#))
10. Request that the Plan scales down provision for additional crèches and shops and in their place provide for increased parklands and recreational areas. ([DraftOB0060](#))
11. Ballyboden St. Enda's GAA Club supports the replacement playing pitches at Gunny Hill and is prepared to construct the pitches at its own expense to include irrigations, drainage, levelling, maintenance, car parking and dressing rooms subject to planning consent. The club has funds available and can commence construction immediately. The pitch would be fully accessible to the proposed school during school hours with the club using it outside of school hours in an identical manner to the arrangement with Sancta Maria College, Ballyroan. The preferred location for a new facility is Gunny Hill with the proposed Knocklyon Park Extension providing an alternative location. ([DraftOB0062](#))
12. Saint Anne's GAA need additional pitches. Inadequate provision has been made for leisure facilities within the plan and fails to address the importance, trends and need for adequate leisure facilities having regard to the proposed growth in population within the planned area. ([DraftOB0109](#))
13. The area identified by the Council for leisure/recreational space is within the Parish of St. Anne's and would represent an obvious extension of facilities and it is asked that St. Anne's be included in any decision to allocate lands for sport/leisure. ([DraftOB0109](#))
14. Despite the difficulty and cost, the number of playing pitches in the Ballycullen-Oldcourt area should be increased in view of the increase in population and in view of South Dublin County Council's Sports Partnership Strategy 2010-2016. ([DraftOB0061](#))
15. Investors would like to build an indoor tennis court on lands that they can purchase in the Ballycullen/Oldcourt area. Feasibility is based on the provision of 4 no. international sized tennis courts with (inter alia) a coffee/tennis shop at ground floor and a viewing gallery at first floor. The site area requirements to accommodate such would be 1.7 acres including parking and the building would need a minimum unobstructed height of 9 meters. Variations could include a single tennis court (0.23 acres), 2 no. tennis courts (0.5 acres) or 3 no. tennis courts (0.63 acres). A copy of the plans is enclosed with the submissions. The provision of car parking may vary according to the Local Authority. ([DraftOB0111](#))
16. The Ballyboden Wanderers GAA Club is the only club in the area with one single playing pitch. New residential development in the area has added to a growing community. With the increase in population, the club would like to expand their facilities with a second playing pitch. Appraisal of lands have drawn the club to a site along Stocking Avenue and it is understood that planning permission for Stocking Wood provides for 11 acres of public open space that is zoned Objective F and these lands have been secured for open space by the

Council through a condition. The lands are adjacent to Knocklyon Park and the M50 and will consolidate a green belt. Having reviewed the objectives and policies of the County Development Plan (Section 1.3 Social Inclusion, Community Facilities and Recreation, Section 1.4 Sustainable Neighbourhoods and Section 4.3 Landscape, Natural Heritage and Amenities) the use of these lands by Ballyboden Wanderers GAA Club for a second playing pitch is contested. ([DraftOB0112](#))

17. The Stillorgan Rugby Football Club (SRFC) has outgrown the current leased facility and there is no opportunity for expansion. The club is seeking to expand but the current premises do not have the facilities for the underage rugby club structure. There is an opportunity within the Plan Lands to facilitate the SRFC expansion. By building the club up from the grassroots, in time the club can engage the community with the club and with Rugby. ([DraftOB0126](#))
18. More green spaces should be provided for in this environmental sensitive area. ([DraftOB0123](#))
19. Resident would like open space and green space to be substantial areas rather than the 'token minimum' spaces previously provided by developers. ([DraftOB0115](#))
20. Request that the Plan scales down provision for additional crèches and shops, of which there are ample in the area, and in their place provide for increased parklands and recreational areas. ([DraftOB0116](#))
21. Submission on behalf of landowner (6 ha on western side) indicates that the quantum of public open space on their lands should equate to 10%. ([DraftOB0146](#))
22. A public park should be created on the Plan Lands and, subject to availability of Public Land this park could link Old Court and Ballycullen with the Hellfire Club. ([DraftOB0140](#))
23. Green Space to the South East of the Old Court Cottages should be preserved, as provided for in the West Old Court action plan. ([DraftOB0140](#))
24. There is a demand for a children's playground and one should be provided for within the Plan Lands. ([DraftOB0140](#))
25. The area adjacent to the proposed school site should facilitate a pitch for Ballyboden St Enda's GAA Club. The Council should also examine the feasibility of providing pitches for other field games such as Soccer and Rugby. ([DraftOB0140](#))
26. Knocklyon FC does not own any all-weather facilities to provide winter training and has to rent such facilities. Knocklyon does not have any parks or playgrounds. It is requested that an Astro Football Facility that incorporates a children's playground should be included in any plans for the Ballycullen – Oldcourt Area. ([DraftOB0130](#))
27. No additional playing pitches i.e. soccer or GAA should be considered as there are already pitches within the park and surrounding areas. Create and promote additional sports activities including basketball and tennis courts within the extension. ([DraftOB0143](#))
28. Query where additional parklands are to be located ([DraftOB0145](#))
29. Resident requests that a playground and tennis courts be incorporated into the plan as the area already has a number of playing pitches. ([DraftOB0147](#))
30. Would like Ballycragh Park to be extended into the Plan Lands - this would help to retain the mountain view and the green belt. ([DraftOB0147](#))
31. Cycle and walking paths should be identified and developed together with a linear park that would link the Ballycullen and Oldcourt residential area to Montpellier Hill. ([DraftOB0148](#))
32. Support proposed Knocklyon Park extension. ([DraftOB0137](#))
33. There are no specific provisions for playgrounds and other areas for children. ([DraftOB0137](#))
34. There is a lack of recreational areas for children to play in the areas and there does not seem to be any provision for such facilities in the draft plan. ([DraftOB0138](#))
35. The Plan has limited provision for sports and leisure centres. Pitches required include: a GAA pitch, additional land for Ballyboden St Enda's and St Anne's and a 400 metre track connecting to longer running areas. Consideration should be given to locating such pitches and tracks under the ESB 220kV lines. Consideration should also be given to locating the pitches and tracks on the site of the proposed attenuation lake as the area is only under water in exceptional circumstances. ([DraftOB0181](#))
36. The plan must include a playground on the western side of the local area plan. ([DraftOB0183](#))
37. A high amenity public parkland should be created from the townlands of Woodtown, Oldcourt and Bohernabreena. ([DraftOB0186](#))

38. Resident queries the nature of education, community and recreation facilities proposed under the Draft LAP. ([DraftOB0022](#))

### **Responses**

#### Quantum of Public Open Space

The Draft Local Area Plan provides for open space at quantities over and above the minimum requirements of the County Development Plan (14% of development sites zoned objective A1). The minimum public open space requirement under the Draft Local Area Plan equates to 20% on the Lower Slope Lands and Mid Slope Lands and 30% on the Upper Slope Lands.

In contrast to submissions from residents to increase the quantum of public open space on the Plan Lands, a submission from a landowner suggests a public open space provision of 10% on their lands.

The open space quantum prescribed under the Draft Local Area Plan is tailored to address the challenges presented across the Plan Lands including its sloping topography, surface water runoff, the absence of recreation spaces and the need to incorporate green buffers and wetland areas. The minimum quantum also respond to the setting of the Plan Lands on semi-rural lands within the foothills of the Dublin Mountains and the dispensation to provide reduced densities in limited circumstance

#### Accessibility of Open Space and Community Facilities

The network of open space that are planned to permeate the Plan Lands including the Knocklyon Park Extension will be universally accessible to existing and future residents and within walking distance of homes via the tracks and trails and cycleways that are planned under the Accessibility and Movement Strategy. This will limit the need for car parking (see response to Car Parking – Issue 29 below).

It is a requirement of the Plan to locate community floorspace within both the Neighbourhood (eastern side) and Local Centre (western side) on the Plan Lands. These sites are strategic locations and will be easily accessible for all the population living there both on foot and by car.

#### Children's Play Facilities

Children's play facilities are provided for under the Draft Local Area Plan including within the Green Infrastructure Strategy (Table 5.3), the Phasing Strategy (Tables 6.3.1 – 6.3.2) and the Standards and Design Criteria Section (Appendix 2)

A minimum of one Neighbourhood Equipped Area for Play (NEAP) with a minimum activity area of 1,000 sq.m and play facilities for a wide range of age groups is required within Phase One on both the eastern and western sides of the Plan Lands.

Local Equipped Areas for Plan (LEAP) with a minimum activity area of 400 sq.m and play facilities for children up to 8 years of age are also required within the Neighbourhood Parks that are planned under the Draft LAP. Furthermore, Young Children's Areas for Play (YCAP) with a minimum activity area of 100 sq.m and play facilities for children up to 6 years of age are required within local pocket parks.

It is recommended that the Draft Plan's Green Infrastructure Strategy (Section 5.3) be altered to include a heading with text that reiterates the requirements of the Draft Plan to provide for children's play facilities in the form of NEAPS, LEAPS and YCAPS within neighbourhood parks and local pocket parks.

#### Playing Pitches and Tennis Courts

Submissions made on behalf of a number of sports clubs request that playing pitches be made available for each club. In contrast, submissions from a number of residents request that no

additional playing pitches be provided on the basis of the number of available playing pitches and the need to provide for other sporting and recreational activities such as tennis and basketball.

It is calculated that there are at least 19 playing pitches located within open spaces and school grounds in Knocklyon, Firhouse and Bohernabreena. On this basis it is considered that the area of the Plan Lands has a substantial number of playing pitches. This includes for playing pitches on nearby and adjoining lands within Knocklyon Park, Saint Colmcille's Secondary School, Firhouse Secondary School, Saint Anne's GAA Club, Ballycragh Park and the linear open space between Killininy Road and Ballycullen Road in Firhouse.

It is noted that the development of the Plan Lands would result in the loss of the GAA pitches off the Oldcourt Road, which are zoned (Objective A1) for residential development. It is within this context that the Draft Local Area Plan's Green Infrastructure Strategy and Specific Objectives provides for area of 1.8 hectares for replacement playing pitches on lands zoned Objective B adjacent to a planned primary school off the Oldcourt Road. The Specific Objectives (Appendix 1) suggest that the replacement pitch should be shared with the adjacent designated school site. These lands are privately owned and the use or designation of the playing pitch area will be a matter for the planned school and/or landowners and is therefore outside the control of the Planning Authority.

Other areas in and around the Plan Lands have been assessed in terms of the provision of playing pitches and have been found to be unsuitable in terms of the steep topography of the Plan Lands, the need to provide flood attenuation areas and the balance that the Green Infrastructure strategy seeks to strike in terms of passive and active recreation spaces that can be utilised by people of varying ages, abilities and interests and ensures that parks and areas of open space are not monopolised by playing pitches and can support biodiversity.

This is particularly the case for Knocklyon Park where 3 playing pitches have already been provided and it is within this context that the planned Knocklyon Park Extension provides for a wetland area to deal with issues of surface water attenuation and biodiversity together with suggested parkland with a network of tracks and trails.

The Artist's Impression of the Knocklyon Park extension indicates the provision of a small area that would cater for playing courts (tennis, basketball, MUGA etc). This will ensure that Knocklyon Park is not oversubscribed with playing pitches. The Development Plan Zoning objective of the proposed Knocklyon Park Extension (Objective F – Open Space and Recreational Amenities) also supports the provision of recreation facilities/sports clubs such as tennis courts. The LAP and Development Plan therefore already provide scope for the provision of a tennis facility at this location, which will need to be subject to further assessment at planning application stage subject to consultation with the Council's Planning and Park's Departments.

It is noted that Table 5.3 in the Green Infrastructure Strategy provides sports pitches as an example of active recreation facilities to be provided in neighbourhood parks. Interpretation of this table could result in a further over prescription of playing pitches in neighbourhood parks at the expense of passive recreation, other sports facilities and SUDS. It is recommended that Table 5.3 of the Draft Local Area Plan be amended to state that active recreation facilities in Neighbourhood Parks should take the form of children's play facilities and sports facilities such as tennis courts, basketball courts and multi-use games areas.

#### Allotments

It is noted that the Draft Local Area Plan fails to provide for allotment and recommended that the plan be altered to provide for such amenities.

#### **Recommendation**

Amend Table 5.3 of the Draft Local Area Plan to suggest the provision of allotments in Neighbourhood Parks and state that active recreation facilities in Neighbourhood Parks should

take the form of children's play facilities and sports facilities such as tennis courts, basketball courts and multi-use games areas.

Alter the Draft Plan's Green Infrastructure Strategy (Section 5.3) to include a heading with text that reiterates the requirements to provide children's play facilities in the form of NEAPS, LEAPS and YCAPS within neighbourhood parks and local pocket parks with reference to requirements of Table 5.3 of the Draft Plan, the Phasing Strategy (Section 6.0) and the Standards and Design Criteria Section (Appendix 2).

## **12 RESIDENTIAL DEVELOPMENT OPTIONS & DENSITY**

### **Issues Raised**

1. Support for increased green spaces, lower densities and dwelling houses as opposed to apartments/duplexes to be located along the avenue at Stocking Heath. ([DraftOB0007](#))
2. Medium and low density development proposed under the LAP is welcomed at this unique location at the foothills of the Dublin Mountains. ([DraftOB0024](#))
3. There should be a substantial reduction in the number of dwellings planned for the area together with the provision of larger green spaces. ([DraftOB0042](#))
4. Residential development densities should be evaluated to ensure that traffic volumes along Stocking Avenue and adjoining roads do not increase significantly. ([DraftOB0038](#))
5. Lower density housing is required. ([DraftOB0052](#))
6. The density of homes beside and behind Stocking Wood should be at the lowest level. ([DraftOB0056](#))
7. Support given for the stepped housing densities between the lower and upper slopes and the graduated heights of houses and other buildings as they ascend the slopes. ([DraftOB0066](#))
8. The lowest prescribed density of 12 – 18 dwellings together with low rise development should apply to all the Plan Lands and all three areas (lower, middle and upper slopes) to reduce the impact of development on the Dublin Mountains. Single dwellings should face existing residential areas. ([DraftOB0123](#))
9. Residential development densities should be evaluated to ensure that traffic volumes along Stocking Avenue and adjoining roads do not increase significantly. ([DraftOB0125](#))
10. Residents of Oldcourt Cottages would like development to the rear of Old Court Cottages to be low density. ([DraftOB0127](#))
11. Submission on behalf of landowner (6 ha on western side) requests that their lands should benefit from as much housing as possible. ([DraftOB0146](#))
12. Submission on behalf of landowner (two sites comprising 20 ha total on western side) proposes a higher density residential development on a site located across the mid to upper slopes of the Plan Lands (site no. 2). It is advised that a large proportion of their site has been allocated as open space and has nearly halved their development potential to an extent that would be underutilised and unsustainable. It is proposed that the residential density directly abutting the proposed Main Link Street should be increased from very low density to low to medium density. ([DraftOB0128](#))
13. Objects to low density residential development due to its inefficiency in terms of public infrastructure, public transport and in terms of extending travel times to important destinations and it leading to excessive consumption of non-renewable resources, such as land. Low densities are counter to contemporary tenets of good urban planning. ([DraftOB0117](#))
14. Submission on behalf of landowner on western side of Plan Lands supports the proposed density of development. ([DraftOB0131](#))
15. Woodstown Residents' Association encouraged by the decrease in the housing density but has concerns regarding the impact building heights will have on the existing environment. Consideration should be made to increase the number of larger properties. ([DraftOB0143](#))
16. Supports revised residential densities. ([DraftOB0137](#))
17. Additional housing to the south of Stocking Wood would have a negative affect on the quality of lives of existing residents. ([DraftOB0157](#))
18. Applaud the aspirations of the plan in particular the reduction in densities on the upper slopes. Regrets that existing planning permissions for high densities were recent renewed. ([DraftOB0141](#))



19. Resident queries composition of low density housing. ([DraftOB0022](#))

### **Response**

Submissions on residential density vary with residents supporting the proposed densities, residents requesting that densities be further reduced and land owners requesting that densities be increased. A further submission from a planning consultant supports increased densities.

The majority of the Plan Lands (80%) are zoned for residential development under the *South Dublin County Council Development Plan, 2010 - 2016*. In accordance with the requirements of Planning and Development Legislation, this is reflected throughout the Draft Local Area Plan including its Land Use and Density Strategy

The *South Dublin County Council Development Plan, 2010 - 2016* and the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas* (2009) prescribe densities of 35 – 50 dwellings per hectare on residential zoned lands in outer suburban areas such as the Plan Lands. Both the County Development Plan and Residential Development Guidelines allow for lower densities in limited circumstances. It is within this context that densities proposed under the Draft Local Area Plan are significantly lower than those normally prescribed for outer suburban areas.

The Local Area Plan's Density Strategy and rationale responds to the constraints of the Plan Lands including their peripheral location, the need to create a transition between the suburbs and the countryside and the need to protect the setting of the Dublin Mountains. The Draft Plan also sets out to counterbalance the density of development (net density of approx. 40 dwellings per hectare) that has taken place on the eastern side of the Plan Lands in the absence of a high quality public transport system and community facilities.

In order to respond to the location, setting and relationship of the Plan Lands to the Dublin Mountains/countryside and the adjacent suburbs, development is directed within three distinct linear areas. Densities range from medium-low density close to existing housing on the Lower Slope Lands (32 – 38 dwellings per Ha.), low density on the Mid Slope Lands (22 – 28 dwellings per Ha.) and very low density on the Upper Slope Lands (12 – 18 dwellings per Ha.).

The densities will allow for approximately 1,600 additional homes across the Plan Lands or approximately 55% of the dwellings that would have been constructed if the density of development permitted on the eastern side of the Plan Lands were to continue (2,900 dwellings). In addition to proposals to reduce car dependency under the Plan's Accessibility and Movement Strategy (see Vehicular Movement and Integrated Street Network above), these reduced densities will help to minimise any increases in traffic volumes.

The densities of development permissible under the Draft Local Area Plan allows for an increased public open space provision. The Draft Plan requires a minimum of 20% on the Lower and Mid Slope Lands to comprise public open space and 30% on the Upper Slope Lands. The standard minimum public open space requirement under the County Development Plan is 14% in areas zoned objective 'A1' and 10% in all other cases.

### **Recommendation**

No alteration(s) to Draft Local Area Plan recommended.

### **13 DWELLING MIX**

#### **Issues Raised**

1. The Plan should contain provision for the equal dispersion of social/affordable housing throughout the Plan Lands. It is unfair to have one estate with a majority of social housing. Existing social housing should be offered back to the private market. ([DraftOB0017](#))

2. The number of social housing properties in Stocking Well should be taken into consideration and the quota requirements for further social housing should be revised downwards in response to existing high numbers. ([DraftOB0025](#))
3. It is requested that consideration be given in relation to defining quotas for social and affordable housing in any new development in Stocking Wood in the context that the quota for such housing in the area has already been exceeded. ([DraftOB0038](#))
4. There is more than adequate apartment type buildings in the area and these are no longer required. ([DraftOB0052](#))
5. Proposals in relation to the provision of social housing adjacent to the traveller accommodation site should be re-examined and consideration should be given to voluntary or co-operative housing. ([DraftOB0056](#))
6. It is requested that consideration be given in relation to defining quotas for social and affordable housing in any new development in Stocking Wood in the context that the quota for such housing in the area has already been exceeded. ([DraftOB0125](#))

## **Response**

### Tenure

The percentage of residential development required for social/affordable housing is governed by the *South Dublin County Council Housing Strategy (2010 – 2016)* and Planning and Development Legislation. The Housing Strategy forms part of the South Dublin County Council Development Plan (2010 – 2016) and a review of the required quantum of social/affordable housing is outside the control of the Local Area Plan.

The concentration of social/affordable housing within the Stocking Well Estate was noted during the preparation of the Draft Local Area Plan and it is within this context that a requirement to disperse social and affordable housing was inserted into the Draft Local Area Plan (see Section 5.4.3).

### Dwelling Types

The densities prescribed under the Draft Local Area Plan are conducive to housing. Examples of house types that would be achievable at the mid range within each of the three density areas are included on page 31 of the Draft Plan. These include 2 storey semi-detached housing, 2 storey detached housing and single storey detached and semi-detached housing.

The Draft Local Area Plan enables a dwelling mix of 90% or more houses and prohibits the provision of apartments and duplex units on the Upper Slopes of the Plan Lands.

## **Recommendation**

No alteration(s) to Draft Local Area Plan recommended.

## **14 LOCAL SHOPPING & COMMUNITY FACILITIES**

### **Issues Raised**

1. A neighbourhood and community centre are required to meet the needs of the existing population and should be within walking distance of Stocking Wood residents. Local amenities should be provided before any further development commences. ([DraftOB0025](#))
2. The shops, crèche and community centre planned next to Stocking Wood are not featured in the Draft Plan. ([DraftOB0047](#))
3. There is no focal point or planned village in the plan. ([DraftOB0052](#))
4. A neighbourhood centre consisting of a few small retail units should be provided at Stocking Avenue. ([DraftOB0056](#))
5. The neighbouring centre off Stocking Wood should have a bar (public house), similar to that in the Firhouse Community centre. ([DraftOB0061](#))
6. The Stocking Wood Centre (neighbourhood/community) should contain the most facilities and amenities in view of increased local young populations. ([DraftOB0061](#))



7. The Local Area Plan should provide local amenities that residents can walk to rather than drive to and the lands beside Stocking Well should be developed into a park. The community centre proposed in the plan should be built within an open space. ([DraftOB0125](#))
8. Submission on behalf of landowner (6 ha on western side) requests that their lands should benefit from as much retail as possible to include a large neighbourhood shop, take away, chemist and betting office. ([DraftOB0146](#))
9. Submission on behalf of landowner on western side of Plan Lands considers that Objective LUD8 is somewhat ambiguous in terms of the delivery of community floorspace to the two main identified locations, which is required at a rate of 3sq.m per 10 dwellings. ([DraftOB0131](#))
10. A neighbourhood centre, consisting of small retail units should be provided at Stocking Avenue. ([DraftOB0140](#))
11. The development of amenities and recreational facilities such as a swimming pool/community centre/sports facilities should be provided through levies imposed on developers. ([DraftOB0143](#))
12. Query if the neighbourhood centres will be shops. ([DraftOB0145](#))
13. Consideration should be given to a local shopping centre in the Stocking Avenue area. ([DraftOB0148](#))
14. Supports local town centre. ([DraftOB0137](#))
15. There is a need for a Village on the Oldcourt Road. ([DraftOB0138](#))
16. Need for green areas, local shops, schools and playgrounds. ([DraftOB0177](#))
17. Lack of services in the area. ([DraftOB0164](#))

### **Response**

Two focal points for local shopping and community facilities have been designated under the Draft Local Area Plan. This includes the site of the discount food store off the Oldcourt Road on the western side of the Plan Lands and the site of the previously permitted commercial/community centre within the Stocking Wood Development on the eastern side of the Plan Lands. Both these focal points will be within walking/cycling distance from existing and proposed homes. The elongated and linear nature of the Plan Lands and its steep topography does not provide the opportunity to locate a single large local centre in one location.

It is a requirement under Section 5.4.7 of the Draft local Area Plan to provide community facilities at a rate of 3 sq.m per 10 dwellings and the intention of the Plan Land that this floorspace will be grouped in the two designated local shopping and community facilities. This will equate to a minimum of 460 sq.m on the eastern Plan Lands (190 sq.m to serve existing dwellings) and a minimum of 300 sq.m on the western side of the Plan Lands as detailed in the Phasing Strategy (Section 6).

The Specific Objectives of the Draft Local Area Plan (Appendix 1) requires the neighbourhood and community centre on the eastern side of the lands to be similar to that previously permitted under an expired permission on the Stocking Wood Local Centre site. In addition to the required childcare floorspace, the Draft Plan requires the provision of at least 460 sq.m of community floorspace at this location together with convenience shopping floorspace (no greater than 1,500 sq.m). The Draft Local Area Plan's Phasing Strategy requires the construction of the neighbourhood and community centre to commence under Phase One of development on the eastern side of the Plan Lands.

The Specific Objectives also set out to ensure that the Discount Foodstore Site shall provide the primary location for community floorspace on the western side of the Plan Lands (minimum of 300 sq.m). The Phasing Strategy requires this floorspace to be provided, at the latest, within Phase Two of development on the western side of the Plan Lands.

Both of these sites are considered suitable to provide for the needs of the existing and future residents of the Plan Lands. Provision has also been made in the Draft Plan to allow for local and small scale 'corner shop' development on the western side of the Plan Lands.

It is envisaged that community and retail floorspace will be provided by the landowners and developers of the Plan Lands in tandem with any further residential development. The scale and nature of retail units will be assessed at planning application stage. The uptake of retail/service units will be market dependent and is outside the control of the Planning Authority.

### **Recommendation**

No alteration(s) to Draft Local Area Plan recommended.

## **15 SCHOOL PROVISION**

### **Issues Raised**

1. It is recognised that a school is required in the area and that there will be strong demand for school places in the future. Gaelscoil Na Giúise has yet to secure a site in the local area and the Oldcourt Site would be an ideal location. ([DraftOB0001](#))
2. Oldcourt resident enrolled her youngest child into Gaelscoil Na Guise because of its close proximity and opportunity to meet local children. It would be impractical to locate Gaelscoil Na Guise beyond walking distance of its Firhouse catchment on the Stocking Avenue Site. The Oldcourt Site should therefore be designated as a permanent site for Gaelscoil Na Guise. ([DraftOB0002](#))
3. Secondary schools are required in the area. ([DraftOB0011](#))
4. Support for the provision of a permanent primary school on the Plan Lands and proposes that Firhouse Educate Together and Gaelscoil be allocated this site. ([DraftOB0018](#))
5. It is noted that the school site designated on the eastern side of the Plan Lands under the County Development Plan has yet to take place and requested that school sites are developed with parking and drop-off facilities. South Dublin County Council and the Department of Education should work together in the development of school sites in the area. ([DraftOB0024](#))
6. Welcome the inclusion of another school in the plan but request that consideration be given to parking for parents dropping off their children so that this does not take place on Stocking Avenue or in Stocking Wood Estate. ([DraftOB0025](#))
7. Full support to the provision of two school sites within the Plan Lands and request the Council to adopt the LAP to provide adequate school space on the Oldcourt Road for Firhouse's two new primary schools. Suitable temporary school accommodation should be provided either adjoining the permanent site, or nearby, until the permanent structures are in place. ([DraftOB0027](#) [DraftOB0028](#) [DraftOB0029](#) [DraftOB0031](#) [DraftOB0033](#) [DraftOB0034](#) [DraftOB0035](#) [DraftOB0039](#) [DraftOB0040](#) [DraftOB0041](#) [DraftOB0043](#) [DraftOB0046](#) [DraftOB0048](#) [DraftOB0054](#) [DraftOB0055](#) [DraftOB0058](#) [DraftOB0063](#) [DraftOB0067](#) [DraftOB0120](#) [DraftOB0142](#) [DraftOB0144](#))
8. The Firhouse Educate Together School is currently renting temporary accommodation in Tymon Bawn Community Centre, which is neither local nor ideal. Two proposed sites within walking distance of Firhouse are welcome and it is requested that a price for the lands be agreed between the Department of Education and local councillors. ([DraftOB0044](#))
9. The inclusion of a school next to Stocking Wood is welcomed and consideration should be given with regards to parking and drop-off facilities together with an evaluation of the capacity of Stocking Avenue in terms of an increase in traffic. Housing densities also need to be evaluated to ensure that the size of the school is appropriate. ([DraftOB0038](#))
10. A second senior school is needed in the area. ([DraftOB0052](#))
11. School buildings should be located below the 120 metre contour and the section of road between Orlagh and Hunters Road should be closed to through traffic to create a safe school entrance. ([DraftOB0056](#))
12. Support given for both school site locations within the Plan Lands and requests that cooperation takes place between the Department of Education and South Dublin County Council to provide for temporary accommodation by September 2014. ([DraftOB0057](#))
13. The Department of Education and Skills notes the reservation of two primary school sites to serve existing and future needs and concurs with the reference to educational provision in the LAP. Any utilisation of sites will be subject to inspection and approval by the Site Acquisitions and Property Management Section of this Department. ([DraftOB0065](#))

14. Both schools planned in the LAP should have catchment areas extending out to the M50, even if this means overlap to ensure that people in neighbouring estates can attend either of the schools. ([DraftOB0061](#))
15. The inclusion of a school next to Stocking Wood is welcomed and consideration should be given with regards to parking and drop-off facilities together with an evaluation of the capacity of Stocking Avenue in terms of an increase in traffic. Housing densities also need to be evaluated to ensure that the size of the school is appropriate. ([DraftOB0125](#))
16. When planning for schools, consideration should be given to their location and the impact that they will have on the volume of traffic generated and congestion in the vicinity. ([DraftOB0115](#))
17. New schools built in the area should be Community Schools and special interest/religious groups should be part of such community schools. ([DraftOB0115](#))
18. Submission on behalf of landowner (two sites comprising 20 ha total on western side) expresses support in relation to the inclusion of the entirety of their site (site 1) that provides for the proposed Oldcourt School and replacement playing pitches. ([DraftOB0128](#))
19. The allocation of a site suitable for the two new schools for the Firhouse area is welcomed. Any new school should be accompanied by a pedestrian crossing and appropriate traffic calming measures. The Schools should be located within the 120 meter line to preserve the Mountain View. ([DraftOB0140](#))
20. Query if the two school sites are to be primary or secondary or both. ([DraftOB0145](#))
21. Resident requests that a secondary school be included in the plan. ([DraftOB0147](#))
22. Locate schools in the Ballycullen and Oldcourt area, close to the population centres and strictly beneath the 120 meter contour. ([DraftOB0148](#))
23. Supports proposed provision of new schools. ([DraftOB0137](#))
24. The inclusion of the two school sites is welcomed but queries if adequate secondary level school places are provided for. ([DraftOB0181](#))
25. The plan lands should accommodate the two primary schools in the one campus (educate Together and Gaelscoil) currently open in the D24 area. The reserved site on the 'Objective B' lands between Gunny Hill and Oldcourt Lane should be increased from 1.8 Hectares to 2.5 Hectares. This can be facilitated by moving the adjoining pitch closer to the east side of the B zoned land. ([DraftOB0183](#))
26. Welcomes the inclusion of multiple sites for the provision of Primary School buildings particularly to the west of the Plan Lands. Gaelscoil Na Giúise is housed in temporary accommodation and only caters for one classroom. It is a matter of urgency to find suitable accommodation in the locality for two classrooms from September 2014. Request that the Council take into consideration the provision of a school for Gaelscoil Na Giúise and identify a site for temporary school building to remain open until a permanent school is built. ([DraftOB0132](#))

## **Response**

The Department of Education and Skills were consulted with regards to the requirements for school places both in the immediate area of the Plan Lands and the Plan Lands themselves. The submission of the Department of Education on the Draft LAP confirms the need for two primary school sites and does not raise the need for a site for a secondary education facility.

The Oldcourt/Gunny Hill School Site was selected on the basis of (inter alia) its flat topography and its ability to accommodate a school together with replacement playing pitches. The Stocking Avenue site is designated for a Primary School site under the current County Development Plan having been initially designated for such a use under the 1998 County Development Plan.

The patronage of any schools developed within the Plan Lands will be determined by the Department of Education and Skills and is outside of the remit of this Plan. The provision of temporary accommodation will also be a matter for the Department of Education and Skills and is outside the remit of this plan and would be assessed at planning application stage within the context of the requirements of this Draft LAP.

Both identified school sites will be accessible to a significant population and will encourage sustainable modes of transport including walking and cycling. Both sites are also accessible from existing roads and proposed new streets. Within this context, Objective LUD13 of the Draft Plan sets out to ensure that school sites are developed to include safe queuing and drop-off facilities. It is recommended that the Draft Local Area Plan be altered to reiterate this objective under the Site Specific Objectives (Appendix 1) for each of the school sites.

All new streets, including those that will serve the two designated school sites, will form part of the integrated accessibility and movement strategy for the Plan Lands. It is a requirement of the Draft Local Area Plan for new streets to be designed to promote walking and cycling and to be traffic calmed through adherence to the *Design Manual for Urban Roads and Streets* (2013).

In terms of existing access to the Oldcourt School Site, Objective SSP38 of the Draft Local Area facilitates the possible reduction of the carriageway width of Ballycullen and Gunny Hill Road to accommodate a footpath and, where possible, to create a revised one way traffic arrangement that would allow for a contra flow cyclist movement. This objective would help to create a safer environment for pedestrian movement in close proximity to the Gunny Hill School Site.

As indicated above, both school sites will be also served and accessible through undeveloped lands via Local Link Streets, which are comprehensively detailed and illustrated in Appendix 6 of the Draft Local Area Plan (Street Typologies) to include wide footpaths and cycle tracks and a vehicular carriageway with a design speed of 30 – 40 kph.

### **Recommendation**

Alter the Site Specific Objectives for the Stocking Avenue Primary School Site and Oldcourt School Site (Appendix 1) to reiterate the requirement for vehicular access to school sites to be designed to include safe queuing and drop-off facilities.

## **16 BUILDING DESIGN AND HEIGHTS**

### **Issues Raised**

1. Views from Stocking Wood should be preserved through height restrictions. ([DraftOB0012](#))
2. The views of the Dublin Mountains should be protected. ([DraftOB0006](#))
3. Views of the mountains should be protected through height restrictions. ([DraftOB0021](#))
4. High rise housing looks incongruous on a hillside and should not be granted planning permission. ([DraftOB0032](#))
5. The height of the first line of housing backing onto Oldcourt Cottages need to be kept to single storey as per existing houses in Ely Drive and SLO 87 of the County Development Plan in order to respect the height of existing cottages in the area. ([DraftOB0036](#))
6. All new building should be kept low rise to protect mountain views and prevent overlooking. ([DraftOB0042](#))
7. There should be height restrictions to any new development to the south of Stocking Wood to ensure that mountain views are protected. ([DraftOB0038](#))
8. Two to three storey housing will impede views of the Dublin Mountains for local residents and tourists. Housing planned near Bohernabreena graveyard will be on a higher level than existing housing and will block views of the mountains. ([DraftOB0052](#))
9. Development in the area should reflect the character of the landscape and duplex or multi-storey housing should be ruled out. ([DraftOB0056](#))
10. No high rise structure such as that granted at Hunterswood should be permissible. ([DraftOB0123](#))
11. There should be height restrictions to any new development to the south of Stocking Wood to ensure that mountain views are protected. ([DraftOB0125](#))
12. Development on the Plan Lands should reflect the character of the landscape. No duplex or multi-storey dwellings should be allowed. ([DraftOB0140](#))
13. Materials used in the construction for any new properties should be in line with current properties already built on the eastern end of the Plan Lands. ([DraftOB0143](#))

14. Query what is meant by 'low rise' building heights and how many stories would this entail. ([DraftOB0145](#))
15. Apartments and dwellings over two stories should not be considered on the Plan Lands. ([DraftOB0147](#))
16. As the lands are in an elevated position, any development should strictly exclude multi-storey and duplex type of buildings. ([DraftOB0148](#))
17. Proposed development alongside Ely Manor Estate should consist of bungalows akin to those in estate and properties should not be overlooked by 2 storey houses in order to protect privacy. ([DraftOB0135](#))
18. Objects to any high rise or high density development especially at higher levels in order to protect views. ([DraftOB0136](#))

## **Response**

### General

It is a requirement under the Draft Local Area Plan that building heights should predominantly be low rise and that views of the Dublin Mountains (including Montpelier Hill and Bohernabreena Valley) and historic buildings and monuments (including Hell Fire Club, Carthy's Castle, Orlagh College and Woodtown Manor) shall be enhanced and preserved as much as possible through the carefully considered and sensitive arrangement of streets, spaces and buildings. No landmark or gateway buildings are proposed or permitted within the Plan Lands.

Objectives contained within the Local Area Plan (Appendix 1) restrict building heights on the Upper Slope Lands to no more than one storey at street level, no more than two storeys at street level on the Mid Slope Lands and no more than three storeys in height on the Lower Slope Lands. It is also a requirement that any new housing backing onto or adjacent to single storey housing or sharing a common boundary should be no more than two storeys in height.

### Oldcourt Cottages, Ely Manor, Stocking Wood and Bohernabreena Graveyard

In terms of buildings heights in the vicinity of Oldcourt Cottages and Ely Manor it is noted that the predominant building height in Ely Manor is two storeys. Existing two storey housing (10 no.) in Ely Manor back directly onto the rear gardens of single storey housing on the western side of Oldcourt Cottages. Distances between the rear elevations of single and two storey dwellings average at approximately 55 metres, however, No. 19 Ely Drive is located within 15 metres of No. 5a Oldcourt Cottages. The small number of single storey dwellings within Ely Drive (8 no.) are located directly adjacent to and opposite 2 storey housing.

It is noted that SLO 87 of the County Development Plan requires dwellings on sites facing existing residential development to be single storey in height. The Draft Local Area Plan provides for the preservation of the old hedgerow and ditch along the rear boundary of Oldcourt Cottages and the Plan Lands followed by a continuous Green Buffer (minimum 15 metres in width) and a Local Link Street, which will ensure that new dwellings will not back onto or face directly onto gardens to the rear of Oldcourt Cottages.

These elements together with the minimum requirements of the Local Area Plan on front gardens/privacy streets will ensure a minimum separation distance of approximately 55 metres between the front elevations of new housing and the rear elevations of the nearest dwellings in Oldcourt Cottages. This matches the minimum separation distance between two storey housing in Ely Drive and single storey housing in Oldcourt Cottages and equates to more than double the standard separation distance of 22 metres between dwellings as set out under the County Development Plan. Furthermore, the lands to the rear (south and south-east) of Oldcourt Cottages plateau at approximately 98 metres over datum at the same level of Oldcourt Cottages thus ensuring that the nearest dwellings to the cottages will not be elevated. This will ensure that there is no overlooking, overshadowing or overbearing of dwellings in Oldcourt Cottages.

To provide for a more gradual visual transition of building heights in the Lower Slopes of the Plan Lands, it is recommended that the Draft LAP restriction of no more than two storeys for new



housing backing onto or adjacent to single storey housing or sharing a common boundary (Section 5.5.4) should be extended to include new housing in the vicinity of single storey dwellings on the Lower Slope Lands such as Oldcourt Cottages.

Houses in the vicinity of Bohernabreena Graveyard and Stocking Wood will be no more than 2 storeys in height at street level.

#### Building Materials

Guidance on building materials for residential and commercial developments is provided under the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas* (2009) and the *Retail Planning Guidelines for Planning Authorities* (2012) together with their accompanying design manuals. Using these guidelines, the quality and composition of building materials will be subject to assessment and securitisation at planning application stage.

#### **Recommendation**

Extend Draft LAP restriction of no more than two storeys for new housing backing onto or adjacent to single storey housing or sharing a common boundary (Section 5.5.4) to include new housing in the vicinity of single storey dwellings on the Lower Slope Lands such as Oldcourt Cottages and Ely Drive.

### **17 ENERGY EFFICIENT BUILDING DESIGN AND LAYOUT**

#### **Issues Raised**

1. Query in what way building design will be energy efficient. ([DraftOB0145](#))

#### **Response**

It is a requirement of the Draft Local Area Plan that new developments will be designed in accordance with passive solar design principles to maximise solar gain through the orientation of facades, using the sun's energy to reduce winter heating and utilising thermal mass. Detailed requirements on renewable energies and thermal insulation are provided under building regulations and associated Technical Guidance Documents.

#### **Recommendation**

No alteration(s) to Draft Local Area Plan recommended.

### **18 PHASING STRATEGY**

#### **Issues Raised**

1. There is a need to ensure that community, education, crèche, recreational and shopping facilities are provided prior to or at least in tandem with any residential developments and that existing residential areas are taken into consideration. ([DraftOB0024](#))
2. Ensure that development is prioritised on brownfield and partially developed lands prior to Greenfield development. Development should be linked to provision of adequate critical service infrastructure. It is unclear whether all lands are proposed to be developed within the lifetime of the Plan. ([DraftOB0037](#))
3. It should be a requirement that no new development commences in the area of Stocking Wood until such time as local amenities are built such as a shops, a local convenience store and public house. ([DraftOB0038](#))
4. The construction of shops, crèche and other facilities should be pre-requisite to any development in the area. ([DraftOB0047](#))
5. Existing estates should be completed prior to further development being constructed. ([DraftOB0060](#))
6. Facilities including public transport and roads, which could take 10 years to complete, should be put in place before any housing gets underway. ([DraftOB0110](#))
7. It should be a requirement that no new development commences in the area of Stocking Wood until such time as local amenities are built such as a shops, a local convenience store and public house. ([DraftOB0125](#))

8. Existing estates should be completed prior to further development being constructed. ([DraftOB0116](#))
9. Submission on behalf of landowner (two sites comprising 20 ha total on western side) supports the alignment of the proposed Main Link Street to correspond with the locations of watermains that traverse their site (site no. 2). Submission advises that development on the western side of the Plan Lands is reliant on the delivery of this street and the development of their site is fundamental. ([DraftOB0128](#))
10. Full occupation of existing unoccupied housing should precede any further housing development, infrastructure and community services. ([DraftOB0117](#))
11. Submission on behalf of landowner on eastern side of Plan Lands suggests that there is confusion and contradiction in relation to the wording of the Phasing strategy and footnotes attached to the table for Phase One. Confusion is suggested in relation to progressing an application on a site that is subject to an extant permission that expires prior to the adoption of the Plan and whether such an application should include open space and community facilities. It is suggested that there will be no Phase One if all applications were to wither. The exclusion of a phasing map and the rationale for the phasing strategy is also queried. It is suggested that landowner's lands, which will contribute the open space network, be included in Phase One regardless of extant permissions. ([DraftOB0134](#))
12. Support for inclusion of neighbourhood centre and landscaped parkland, which should be provided as a priority. ([DraftOB0129](#))
13. The building of the primary school should be linked to the development of any further housing. ([DraftOB0143](#))
14. Local community facilities including shops, crèches, and medical centre should be constructed when developments begin in order to help create a community feeling and support the local residents with essential facilities. ([DraftOB0143](#))
15. Welcomes the two primary school sites and requests that they are in place before any more housing development takes place. ([DraftOB0147](#))
16. The NTA state their concerns that the Plan Lands are not a preferred location for large-scale residential development. It would be beneficial for a strategic phasing strategy to be acknowledged in the Plan which would link major development phases in the Plan to the prior achievement of certain completion levels in other strategic development areas of the County. ([DraftOB0182](#))
17. Agrees with Draft Plan that strict phasing of schools, shops and facilities must be provided in conjunction with any development. This should be an absolute requirement for planning permission. ([DraftOB0136](#))
18. The phasing of local amenities for Stocking Wood and surrounding estates is welcomed. Requests that the community centre be put in place prior to any further planning applications. ([DraftOB0181](#))
19. Unfinished housing estates should be taken in charge by the Council prior to any further building works commencing. ([DraftOB0181](#))
20. The Dalriada Estate must be completed before phased development begins in the Local Area Plan. ([DraftOB0183](#))
21. Support for inclusion of neighbourhood centre and landscaped parkland, which should be provided as a priority. ([DraftOB0139](#))
22. Not necessary to build more houses in terms of absence of green areas. ([DraftOB0173](#))
23. Conditions that applied to development in terms of delivery of shops and centre must be carried out. ([DraftOB0174](#))

## **Response**

### General

The Phasing Strategy sets under the Draft Local Area Plan aims to link any further residential development to the delivery of infrastructure, amenities and community facilities by requiring the provision of such facilities either prior to or in tandem with residential development. The Phasing strategy also encourages the completion of unfinished housing/brownfield areas on the eastern side of the Plan Lands by prescribing development that is more conducive to current market conditions and including these lands within Phase One of the Phasing Strategy.



The timing for the completion of development is market dependent and therefore difficult to determine under current economic circumstances. In the interest of ensuring that the Draft Plan is both pragmatic and flexible to changing economic circumstances, the Phasing Strategy links infrastructure, amenities and community facilities to the provision of dwelling numbers rather than a calendar of dates that may or may not be achievable.

### Phase One

The Plan Lands are divided to the east and west for which three phases are each prescribed. Each phase specifies a quantum of residential development and key pieces of physical and social infrastructure including community facilities that must be provided prior to the next phase of development. This will help ensure that key pieces of community infrastructure are developed in a sequential manner as development progresses.

To reflect current economic circumstances and help ensure that community facilities can be delivered in a pragmatic and viable manner, Phase One on the eastern and western sides of the Plan Lands allows for a limited quantum of residential development to proceed in tandem with facilities. This includes for lands that are subject to extant permissions including unfinished housing areas and will help ensure that community facilities and streets can be delivered from investment generated by development.

Phase One on the eastern side of the Plan Lands requires the provision of the Knocklyon Park extension, the commencement of construction of a school on the eastern or western side of the Plan Lands and the commencement of the construction of the Stocking Wood Neighbourhood and Community Centre. It should be noted that the permission for the Neighbourhood and Community Centre has expired and that the construction of such a facility will require a revised planning application, which is encouraged by the Phasing Strategy.

Phase One of the western side of the Plan Lands requires the commencement of works on the Gunny Hill replacement pitches, the provision of a children's play facility (NEAP) and the commencement of construction of a school on the eastern or western side of the Plan Lands.

In terms of the delivery of public transport services, the Draft local Area Plan suggests, encourages and demonstrates a possible bus route extension that would serve the undeveloped lands on the western side of the Plan Lands. The operation of buses along the suggested route or beyond the Plan Lands to the western end of Oldcourt Road (outside of the Plan Lands) is a matter for public transport service providers such as Dublin Bus and is outside the control of the Council and local landowners.

The taking in charge of existing housing estates is subject to a separate procedure and assessment process that is outside the control and scope of the Draft Local Area Plan process.

### Extant Permission Lands

It is accepted that the Phasing Strategy in the Draft Plan could be interpreted to exclude lands that are not subject to extant permissions from Phase One on the eastern side of the Plan Lands. In the interest in ensuring flexibility in the Phasing Strategy and improving the viability of delivery community facilities and amenities, it is recommended that the Phasing Strategy be amended to clarify that Phase One on the eastern side of the lands includes the development of sites that are subject to extant permissions but is not exclusive to such lands.

### Streets

The provision of streets is regarded as a standard piece of physical infrastructure that will coincide with development as it progresses across the Plan Lands. The proposed grid layout and street hierarchy helps to maximise the number of sites that can be developed independently without the need for a prescribed phasing arrangement. The completion of the proposed Link

Street between Oldcourt Road and Bohernabreena Road will require a partnership approach between developers/landowners.

### **Recommendation**

Alter Phasing Strategy text (Section 6.3) and footnote to table for Phase One on the eastern side of the Plan lands (Section 6.3.1) to clarify that Phase One includes lands that are subject to extant permissions but is not exclusive to such lands.

## **19 QUANTUM OF DEVELOPMENT**

### **Issues Raised**

1. Under the County Development Plan, the Tallaght/Rathfarnham area is indicated as having a capacity of 10,600 units, which is mostly expected to be accommodated in Tallaght Town Centre and the Naas Road Framework Area. The Draft LAP indicates that 1,600 additional dwelling units are expected. It would be beneficial if a table was provided that indicated how each area was implementing the stated allocations through various LAPs including the proposed LAP. ([DraftOB0064](#))
2. 1,600 dwellings seems a huge amount to be put in this area taking the number of apartment buildings in Tallaght that stand idle into consideration and have destroyed the character of the village. ([DraftOB0110](#))

### **Response**

#### General

The *Regional Planning Guidelines for the Greater Dublin Area 2010 – 2022* forecasts that the population of South Dublin will grow to 287,241 in 2016 and to 308,467 by 2022. The housing allocation for the County is also forecast to grow to 115,373 by 2016 and 137,948 by 2022. The 2011 CSO census recorded a population of 265,205 and housing stock of 97,298 for the entire county.

Within this context, approximately 90 hectares of the Plan Lands that remain undeveloped are zoned for residential development under the *South Dublin County Council Development Plan (2010 – 2016)*.

It is envisaged that this Draft Local Area Plan will provide for approximately 1,600 additional dwelling units and an additional population of approximately 4,600 people. This would represent 11% of the predicted population growth for the County for 2022 and 4% of the predicted housing growth. These figures include for approximately 40 Ha. of lands that are subject to current extant planning permissions for residential development upon which reduced housing densities are proposed under the Draft local Area Plan.

The quantum of development permissible under the Draft Local Area Plan is therefore in line with the projections contained within the Regional Planning Guidelines.

#### Development Plan Core Strategy

The Core Strategy of the *South Dublin County Council Development Plan Development Plan 2010 – 2016* identified 159 Hectares of available development land with no extant permissions and a potential housing allocation of 10,600 units in the Tallaght/Rathfarnham area. This forecasted figure includes for the *Tallaght Town Centre Local Area Plan (2006)* and the *Naas Road Development Framework*.

Approximately 70 hectares of lands within the Plan Lands that are zoned for residential development have no extant permissions. This equates to 44% of the lands identified within the Tallaght/Rathfarnham area. Excluding lands that are subject to extant permissions, this Draft Local Area Plan will provide for approximately 1,000 additional dwelling units, which equates to approximately 10% of the potential housing allocation identified for the Tallaght/Rathfarnham area.

The quantum of development permissible under the Draft Local Area Plan is therefore in line with the housing allocations contained within the County Development Plan.

#### Dwelling Numbers

The Land Use and Density Strategy under the Draft Local Area Plan provides for densities (15 dwellings per hectare – 35 dwellings per hectare) that are far reduced compared those achieved on the eastern side of the Plan Lands, which averaged at 40 dwellings per hectare.

The 1,600 dwellings that are permissible under the Draft Local Area Plan equates to approximately 55% of the calculated quantum of development that would take place if the density of development permitted on the eastern side of the Plan Lands were to be constructed and were to continue (2,900 dwellings) across the remainder of the Plan Lands.

#### **Recommendation**

No alteration(s) to Draft Local Area Plan recommended.

### **20 STANDARDS AND DESIGN CRITERIA**

#### **Issues Raised**

1. Facilities such as playgrounds should be of a low maintenance construction and weather resistant ([DraftOB0047](#))
2. Low maintenance equipment should be a feature of a local playground on the Knocklyon Park extension. ([DraftOB0143](#))

#### **Response**

The suggestion to provide low maintenance and weather resistant children's play equipment is noted and it is recommended that the Draft Local Area Plan be amended accordingly.

#### **Recommendation**

Alter Draft Local Area Plan by inserting paragraph into the Standards and Design Criteria Section (Appendix 2 – Materials and Finishes) that requires children's play equipment and finishes to be constructed of low maintenance and weather resistant materials.

### **21 MISCELLANEOUS**

#### **Issues Raised**

1. Questions put forward relating to densities, cycle routes, noise limiting features, education, community and recreational facilities and phasing. ([DraftOB0022](#))
2. The Stocking Wood Estate Residents Committee welcomes the local area plan in relation to improved amenities in the area, lower density development on the hillside and provision of local schools. ([DraftOB0038](#))
3. Submission on behalf of landowner (6 ha on western side) summarises content of the Draft LAP. ([DraftOB0146](#))

#### **Response**

The issues raised are noted.

#### **Recommendation**

No alteration(s) to Draft Local Area Plan recommended.

### **22 ARTIST'S IMPRESSION**

#### **Issues Raised**

1. Exclusion of Green Acres House and Mews from the Draft Artist's impression with indication of new housing in their place raised as a concern by the residents of the existing two dwellings. It is acknowledged that both properties are identified on other drawings. ([DraftOB0003](#))
2. Resident of 'Littlemore' requests confirmation that there is no plan or intention to acquire their property compulsorily. ([DraftOB0118](#))

## Response

As indicated in the response to Development Plan Zoning (Issue 25), the majority of the Plan Lands are zoned to provide for new residential communities subject to approved area plans. This zoning includes Green Acres House and Littlemore. The Artist's impression interprets and illustrates how the Plan Lands could look if they were all development in accordance with the strategies and objectives of the Draft Local Area Plan.

The decision to sell or apply for planning permission for development on privately owned is at the prerogative of landowners and is outside the control of the Planning Authority. It is not proposed that lands be purchased by the Council for development.

## Recommendation

No alteration(s) to Draft Local Area Plan recommended.

## 23 LANDS, STRUCTURES OR ISSUES OUTSIDE OF REMIT OF PLAN

### Issues Raised

1. Fields around St Colmcille's Well and upwards into the mountains should be made a permanent green belt park (National Park), which links with the Hell Fire Club. ([DraftOB0011](#))
2. Request that Stocking Wood be taken in charge by the Council to remove the need for a Management Company. ([DraftOB0016](#))
3. Seeks clarification on whether or not the Day Units, situated at the top of Stocking Avenue, will be included within the Local Area Plan. ([DraftOB0017](#))
4. Request that playing facilities be provided in Ballycragh Park prior to further development taking place. ([DraftOB0022](#))
5. Woodstown House should be preserved and lands adjoining this property should remain agricultural. ([DraftOB0025](#))
6. In order to protect the landscape from additional residential development occurring further up the mountainside, Woodtown House should be preserved and its lands should not be changed for residential development. ([DraftOB0038](#))
7. The green space between Oak Dale Park and Old Court Road should be landscaped. ([DraftOB0056](#))
8. Issues raised in relation to build quality, Priory Hall, accountability, anti social behaviour, developer's modifying plans/designs and giving priority to owner-occupiers. ([DraftOB0123](#))
9. In order to protect the landscape from additional residential development occurring further up the mountainside, Woodtown House should be preserved and its lands should not be changed for residential development. ([DraftOB0125](#))
10. Submission on behalf of landowner (6 ha on western side) raises queries in relation to responsibility and the timing for constructing the Main Link Road between Oldcourt Road and Bohernabreena Road and services. Submission suggests conditions that should be placed on the development of adjoining lands. ([DraftOB0146](#))
11. Submission on behalf of landowner (6 ha on western side) makes a number of general undertakings in relation to the development of their lands subsequent to planning permission. ([DraftOB0146](#))
12. Development Management should take cognisance of Section 5.4.4 Lower Slope Lands when assessing proposed new housing. ([DraftOB0118](#))
13. Request that a demonstrated market demand for housing (2015-2020), on which the proposed residential development is premised, be made public. ([DraftOB0117](#))
14. Alternatives in terms of location, physical design, phasing amongst other facets of the Plan, should be made available to the public and economic and social benefits should be clearly presented. ([DraftOB0117](#))
15. The Green Space between Oak Dale Park and the Old Court Road should be landscaped to ensure maximum enjoyment by residents. ([DraftOB0140](#))
16. Developers should landscape along the Stocking Lane Distributor Road and roundabouts in line with the current theme. ([DraftOB0143](#))

17. The Woodstown Residents' Association would like the existing Knocklyon Park to be enhanced through the development of a number of natural walkways, which exist within the boundaries of the park. ([DraftOB0143](#))
18. Additional car parking for the Knocklyon Park, if required, should be developed off Stocking Lane and not in the Woodstown Village estate as the potential traffic through flow would create additional hazards within the estate which only has singular entrance/exit estate. Security provisions including adequate lighting and surveillance cameras should be put in place to protect visitors using the amenity and protect from potential vandalism. Additional planting of trees and plants along the M50 boundary wall within the current park should be considered to create a buffer zone and give a feeling of an enclosed park with will blend in with the plans of the new extension. ([DraftOB0143](#))
19. Query how long development of the Plan Lands will take and worried that heavy machinery during the construction phase will pose a danger to children. ([DraftOB0145](#))
20. Leylandi trees at the end of Ely Drive are located too close to houses and should be removed. The trees have grown higher than houses (at least 20 feet), block winter sun, inhibit the thawing of ice on roads making them dangerous and vandals have attempted to set fire to them. ([DraftOB0135](#))
21. The council should expedite the proposed playground in Ballycragh Park to facilitate the young population. ([DraftOB0183](#))
22. A revised junction at the northern end of Stocking Lane, which is a narrow T-junction, is necessitated to cope with existing and proposed traffic volumes. ([DraftOB0141](#))
23. Residents suffer from negative equity. ([DraftOB0164](#))
24. Conservation and management plans should be carried out on protected, heritage and vernacular structures to help protect views, prospects and their settings. ([DraftOB0186](#))

### **Response**

All issues categorised under this heading relate to lands, processes or issues outside the remit of the Local Area Plan Process, outside the remit of the Plan Lands or outside the control of the Planning Authority.

### Rationale for Plan and Boundary of the Plan Lands

The rationale for the boundary of the Plan Lands is based on (inter alia):

- The approximate 90 Hectares (222 acres) of undeveloped lands along the Ballycullen-Oldcourt fringe that are zoned for new residential communities subject (Objective A1) and the County Development Plan requirement for residential development on such lands to be carried out in accordance with approved Area Plans. The lands and structures referred to in the submissions under this category are not designated within this zoning objective.
- The existence of approximately 40 hectares (98 acres) of land along or off Stocking Avenue that is subject to planning permissions for relatively high density residential development (including apartment, duplex and triplex units) that may not now be developed;
- The strategic positioning of the (Objective A1) residential zoned land, which forms an almost continuous linear land bank along the Ballycullen–Oldcourt fringe.
- The residential development that has recently occurred along Stocking Avenue and parts of the Oldcourt Road and Hunters Road where community, education and recreational facilities have not kept pace with residential development;
- The necessity to provide a robust Sustainable Urban Drainage Framework for the development of these lands in view of the restricted surface water drainage capacity downstream.

Both Woodstown Manor House and Woodstown Park Lodge are located outside of the Plan Lands and are listed as Protected Structures on lands currently zoned Objective B (rural amenity and agriculture) under the County Development Plan.

The green space within Ballycragh Park and between Oak Dale Park and Old Court Road are located on lands outside of the Plan Lands and formed part of previous planning permissions. The existing area of Knocklyon Park is also outside the remit of the Plan Lands and also formed

part of a previous planning application. Issues in relation to playing pitches are dealt with under Open Space Hierarchy and Functions (Issue 11).

Stocking Lane is also located outside the boundary of the Plan Lands and its junction with Scholarstown Road is located in a well established residential area. Proposals to upgrade this junction would have to form part of a separate Part VIII development process.

#### Taking in Charge

The taking in charge of existing estates is a function of the Council but is not carried out through the Local Area Plan making process. A local area plan normally provides a template for the management of environmental, land use and transport issues. The taking in charge of existing estates is carried out under a separate application and assessment process that is beyond the scope and detail of a Local Area Plan.

#### Main Link Street between Oldcourt Road and Bohernabreena

The planned Main Link Street between Oldcourt Road and Bohernabreena traverses lands that are in a number of private ownerships and will serve dwellings developed on private lands. The Draft Local Area Plan does not propose that this street be constructed by the Council and it is intended that a partnership approach be adopted by developers of the Plan Lands in terms of the delivery of this street in terms of planning permission, funding and construction. The construction of this street will therefore be market dependent and the timing for its construction will be outside the control of the Planning Authority.

#### Planning Applications and Development Management

The planning application process is governed under Planning and Development Legislation and is separate to the Local Area Plan Making Process.

The detailed assessment of any planning application that follows the adoption of the Local Area Plan will be assessed through the Development Management Process, which allows for the submission of further objections/observations in relation a specific development and the attachment of conditions in relation to noise and construction and the removal of Leylandi trees etc. The Planning Authority and An Bord Pleanála must have regard to a Local Area Plan when assessing a planning application.

#### Market Demand for Dwellings, Phasing and Timing

The Draft Local Area Plan sets out to manage and co-ordinate the development of lands that are zoned for development within and around Ballycullen and Oldcourt. The vast majority of zoned lands are within private ownership and the purchase and development of such would be beyond the scope and resources of South Dublin County Council.

Issues raised in terms of the zoning of the Plan Lands, market demand for dwellings, timing of development and phasing are dealt with under Development Plan Zoning of Plan Lands (Issue 25), Quantum of Development (Issue 19) and Phasing Strategy (Issue 18).

#### Alternatives Examined

Substantial research was carried out prior to the drafting of the Plan and the findings of this research can be found in the Strategic Environmental Assessment (which includes an examination of alternatives) and also in the introductory chapters of the LAP.

#### Miscellaneous

Historic social issues in relation to Priory Hall, negative equity, accountability, anti social behaviour, developer's modifying plans/designs are all outside the remit of the Local Area Plan.

It is not possible to introduce conservation/management plans with regards to protected, heritage and vernacular structures within an LAP; this is the remit of the County Development Plan.

### Car Parking

Issues raised in relation to car parking on lands within the remit of the Plan Lands including parklands are dealt with under Car parking (Issue 29). It is not proposed to locate car parking spaces within Woodstown.

## **24 ACCESSIBILITY AND MOVEMENT STRATEGY**

### **Issues Raised**

1. Preparation of a local planning framework to guide development in proximity to the M50 welcomed. A plan relating to lands located in proximity to the national road network should have regard to the provisions of the DoECLG *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012). ([DraftOB0023](#))
2. With regard to transport infrastructure, attention is brought to the NTA's GDA Transport Strategy and Draft GDA Cycle Network Plan. ([DraftOB0037](#))
3. The NTA has concerns in relation to the provision of choice for 'all users' in order to dissipate traffic (in particular Objectives AM4, AM6 and AM14). A clear hierarchy of streets and roads, which directs or channels motor vehicles onto appropriate links would be more appropriate in this case and the principle of filtered permeability – where walking, cycling and public transport are given preference, where appropriate – might apply thought-out the plan lands. ([DraftOB0182](#))

### **Response**

#### M50 Motorway

It is noted that the *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012) relates to development affecting national roads (including motorways, national primary and national secondary roads) outside the 50/60 kmph speed limit zones for cities, towns and villages. The Draft Local Area Plan has been drawn up in a manner that is consistent with the key principles of the guidelines. It is recommended that the Draft Local Plan be amended to include reference to the National Roads Guidelines in Appendix 4.

In terms of the impact of the Draft Local Area Plan on the national roads network, the Plan Lands are located approximately 0.5 kilometres to the south of junction 12 of the M50 Motorway, which is accessed via Killinenny Road/Saint Colmcille's Way (R113), and no direct access onto the motorway is proposed.

The Plan Lands have been zoned for residential development under the County Development Plan and the Draft Local Area Plan seeks to minimise the impacts of development on traffic volumes along the existing and planned road network in the area including those that access the M50 motorway (see Vehicular Movement – Item 5 above). This is proposed by way of reducing permissible housing densities to approximately 50% of that achieved on the eastern side of the Plan lands and reducing vehicular trips by providing integrated streets for convenient vehicular, pedestrian and cyclist movement and augmenting such with an uninterrupted network of pedestrian and cyclist routes that will link existing and planned housing with schools, community facilities and shops within the Plan Lands. The Draft Plan also sets out to maximise public transport use and viability by improving accessibility to existing bus stops and to a suggested new bus route on the western side of the Plan Lands.

#### NTA Strategies

The Draft Local Area has been drawn up in a manner that complies with the provisions of *Greater Dublin Area Draft Transport Strategy 2011-2030*, the *Draft Greater Dublin Area Cycle Network Plan* (2013) and a range of other transport related guidelines and documents including the *National Cycle Manual* (2011), *Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland, 2009 – 2020*, and the *Design Manual for Urban Roads and Streets* (2013).

With the regard to the *Greater Dublin Area Draft Transport Strategy 2011-2030*, the Draft Plan recognises that no heavy or light rail public transport routes are identified to serve the Plan



Lands. It is within this context that the Draft Local Area Plan suggests the extension of the existing bus network into the western side of the Plan Lands in the form of a route between Ballycullen Road and the Bohernabreena Road. This route would utilise the Firhouse/Ballycullen Road Quality Bus Corridor, which forms part of a strategic QBC network for the GDA, in accordance with the objectives of the Draft Transport Strategy.

With regard to the *Draft Greater Dublin Area Cycle Network Plan* (2013), each of the integrated streets typologies designated (Fig. 5.1) and illustrated (Appendix 6) for the Plan Lands ensures that cycle routes will form an integral part of each street and, together with planned pedestrian and cycle tracks and trails through areas of open space, will aid in the creation of a planned, connected and continuous cycle network that will permeate the Plan lands and offer multiple opportunist to connect to the strategic Cycle Network for the GDA.

#### Permeability Network

The network of streets detailed under the Draft Plan's Accessibility and Movement Strategy comprises a clear hierarchy of Link Streets (40 – 50 kph), Local Link Streets (30 – 40 kph) and Local Streets (10 – 30 ph). The movement function of each street type is dependent on its strategic importance within the Plan Lands (i.e. the importance of the destinations/number of houses it connects). The street hierarchy is clearly described in Table 5.1 and illustrated in Figure 5.1 of the Draft Plan. Street typologies are also clearly illustrated and detailed in Appendix 6 of the Draft Plan.

The *Design Manual for Urban Roads and Streets* (2013) contains a range of design measures that will promote the creation of self regulating street network when applied to a street hierarchy. This approach effectively manages vehicular movement so that larger volumes of traffic are attracted to more strategic Link Streets by offering users legible and direct routes throughout the Plan Lands at more moderate speeds. Conversely, the slower and more constrained nature of local streets will result in them being less attractive to through traffic. Vehicular permeability on local streets may also be filtered to reduce traffic flows through measures such as turning restrictions or vehicular cul-de-sacs (with through access for pedestrians and cyclists).

It is recommended the objectives referred to in the submission of the National Transport Authority (Objectives AM4, AM6 AND AM14) be amended to clarify this.

#### **Recommendations**

Make reference to *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012) and the *Draft Greater Dublin Area Cycle Network Plan* (2013) in Appendix 4 (Policy and Strategic Context) of the Draft Local Area Plan.

Alter Objectives AM4, AM6 AND AM14 to clarify that development proposals shall contribute to the creation of a clear hierarchy of streets that are each designed in accordance with their movement functions and in a manner that maximises route choices for pedestrians and cyclists, manages traffic and vehicular speeds, attracts larger volumes of traffic to more strategic links and discourages through traffic from local streets.

## **25 DEVELOPMENT PLAN ZONING OF PLAN LANDS**

### **Issues Raised**

1. Stocking Wood Walk resident objects to additional houses being built in and behind Stocking Wood for the following reasons: the nuisance of living beside a building site; traffic congestion on narrow roads; increased noise pollution; lack of parking spaces and concerns regarding drainage. ([DraftOB0014](#))
2. No further development should be allowed beyond the boundaries of Stocking Wood to preserve mountain views and prevent traffic congestion. ([DraftOB0007](#))
3. Support for some development to take place to clean up the area but the proposed development in the Plan would spoil the area. ([DraftOB0009](#))

4. Objects to further development on lands to the south of Stocking Wood for the following reasons: the construction phase would negatively affect existing house prices; increased risk of flooding or subsidence; insufficient local infrastructure including community and retail facilities to meet the needs of the new development and the exacerbation of traffic congestion on roads linking to the M50. ([DraftOB0016](#))
5. Objects to further development on lands to the south of Stocking Wood for the following reasons: the obstruction of the mountain view (a height restriction of two-stories should be put in place); insufficient drainage and flooding prevention – impartial reports on the surface water and flooding plans are required. ([DraftOB0019](#))
6. Community centres, schools, parks and pitches should be constructed in the area rather than more dwelling houses. ([DraftOB0019](#))
7. Objects to the construction of more buildings on the Plan Lands because they will destroy the scenery and the landscape. The only escape from the existing built up area is the mountains. ([DraftOB0020](#))
8. Request that the Plan's goals and strategies be reconsidered and that no further development take place in this area of the County, in particular at the foot of the Dublin Mountains. Existing areas should be finished and provided with pedestrian/cycle paths, schools, community and retail facilities, cottage industries and retain the unique landscape. ([DraftOB0026](#))
9. The area cannot support the proposed additional dwelling units, in particular the existing road infrastructure. ([DraftOB0026](#))
10. It is noted that the Plan Lands have already been zoned for residential development under the County Development Plan and that approx. 90 hectares of undeveloped lands are zoned Objective A1. ([DraftOB0024](#))
11. Objects to further development on lands to the south of Stocking Wood for the following reasons: the obstruction of the mountain view (if development is to take place height restrictions should be put in place); potential for increased flooding; potential to reduce property valuations in the 'cul-de-sacs'. Request that a strip of land between Stocking Wood and the lands to the south be rezoned for agricultural uses. ([DraftOB0025](#))
12. Objection to the further development of land once called the 'Green Belt'. ([DraftOB0030](#))
13. Highlight environmental sensitivities on zoning maps to ensure that the zoning and development of lands are informed by environmental setting and constraints. Consideration should be given to rezoning, dezoning or reserving strategic lands. ([DraftOB0037](#))
14. Planning permission in the area of Stocking Avenue should not be extended. Plans that exist in the area of Stocking Heath should be completed with a lower density of development and the green space should be finished off. The area plan should be changed to provide green space, clear abandoned builder's waste and secure permanent fencing along Stocking Avenue. ([DraftOB0032](#))
15. There is a need to stop development higher up the mountain particularly above the existing Stocking Wood. A permanent ban to any further development higher up the mountain must be put in place to protect mountain views and prevent traffic build up during peak times on week days. ([DraftOB0032](#))
16. The residents of Stocking Wood do not want any further development on lands to the south and wish to have these lands rezoned for agriculture. Flooding in the area would be exacerbated by additional housing behind Stocking Wood and cannot be addressed by corrective or preventative works. It is urged that the Council re-designate the lands for agriculture and that the current problems of flooding be addressed. ([DraftOB0047](#))
17. Submission against development to the rear of the Stocking Wood estate for reasons of increased flooding from rain and surface water (as experienced in Castlefield, Stocking Well and Glenvara), increased traffic congestions, scaling down/elimination of promised amenities (crèche and shops). ([DraftOB0049](#) [DraftOB0069](#) [DraftOB0070](#) [DraftOB0071](#) [DraftOB0074](#) [DraftOB0075](#) [DraftOB0076](#) [DraftOB0032](#) [DraftOB0077](#) [DraftOB0079](#) [DraftOB0081](#) [DraftOB0082](#) [DraftOB0083](#) [DraftOB0086](#) [DraftOB0087](#) [DraftOB0094](#) [DraftOB0095](#) [DraftOB0096](#) [DraftOB0099](#) [DraftOB0100](#) [DraftOB0105](#) [DraftOB0149](#) [DraftOB0150](#) [DraftOB0151](#) [DraftOB0152](#) [DraftOB0155](#) [DraftOB0157](#) [DraftOB0158](#) [DraftOB0163](#) [DraftOB0154](#) [DraftOB0160](#) [DraftOB0161](#) [DraftOB0162](#) [DraftOB0164](#) [DraftOB0165](#))

[DraftOB0166](#) [DraftOB0167](#) [DraftOB0165](#) [DraftOB0166](#) [DraftOB0167](#) [DraftOB0168](#)  
[DraftOB0169](#) [DraftOB0170](#) [DraftOB0171](#) [DraftOB0172](#) [DraftOB0173](#) [DraftOB0174](#)  
[DraftOB0175](#) [DraftOB0176](#) [DraftOB0177](#))

18. Expand LAP lands to include Woodtown Manor House, which together with surrounding lands could be developed similar to Marley Park. Development should be prohibited above the 120 metre contour. ([DraftOB0056](#))
19. Residential development along the stretch of land from Hunterswood to Bohernabreena has the potential to spoil Mountain Amenity. ([DraftOB0056](#))
20. Objects to further development taking place on lands to the south of Stocking Wood because of the potential for increased flooding; the loss of views and wildlife; deterioration in property values. ([DraftOB0061](#))
21. Against any development on the lands to the rear of Stocking Wood estate for the following reasons: continued/increased flooding from rain and surface water in the area; increased traffic congestion without adequate alleviating measures. ([DraftOB0073](#))
22. Submission against development to the rear of the Stocking Wood estate for reasons of increased flooding from rain and surface water (as experienced in Castlefield, Stocking Well and Glenvara), increased traffic congestions, scaling down/elimination of promised amenities (crèche and shops), air and noise pollution. ([DraftOB0084](#) [DraftOB0085](#))
23. There is no necessity to encroach on the foothills of the Dublin Mountains. Regrettable that lands on the Orlagh College side of the Plan Lands have been zoned, which should be 'de-zoned'. The process of land zoning needs to be addressed and it is time to remove County Councillors from the process. There needs to be full debate on the issue of zoning, planning and development in Ireland. ([DraftOB0121](#))
24. Existing development in Ballycullen – Oldcourt represents some of the worst excesses of zoning and sub standard planning. Lessons have not been learned from the Celtic Tiger years in terms of the destruction of towns, villages and the countryside ([DraftOB0121](#))
25. Oldcourt Cottages are surrounded by fields and offer great views of the surrounding hills and any development would have a dramatic impact on the quality of living. ([DraftOB0122](#))
26. Questions whether development should take place on the plan lands, which should be used as a permanent barrier between existing development and the Dublin Mountains. ([DraftOB0123](#))
27. Against development on lands to the rear of the Stocking Wood Estate. ([DraftOB0089](#))
28. Against development of lands to the rear of Stocking Wood. ([DraftOB0106](#))
29. As much un-spoiled and un-concreted green-belt countryside should be retained as possible, in particular in close proximity to the mountain landscape of the Hellfire Club. ([DraftOB0115](#))
30. The Mountain View should be protected through no further development as it contributes to quality of life and justifies the price of the dwellings in the area. The view is a very important element in the lives of everyone living across this area and was promoted by the selling agent. The view benefits the wider community and all the Dubliners who visit this area and value the amenity it is at the edge of our city. ([DraftOB0115](#))
31. Objects to further development taking place on lands to the south of Stocking Wood because of the potential for increased flooding and increased pressure on road infrastructure. ([DraftOB0116](#))
32. Objects to further development of the mountain environment. ([DraftOB0117](#))
33. Resident questions the necessity to build up to an elevation of 120 metres having regard to available lower lands that can be developed. ([DraftOB0119](#))
34. Request that development be prohibited beyond the 120metre contour level and that the area South of Ely Estate and Old Court Cottages are kept free from development. ([DraftOB0140](#))
35. Query is it necessary to build more dwellings when there is a surplus in the area. ([DraftOB0145](#))
36. All development should be confined below the 120 meter contour. ([DraftOB0148](#))
37. The area south of Oldcourt cottages and Ely Estate should remain free of development. ([DraftOB0148](#))
38. Objects to further development to the south of Stocking Wood for the following reasons: increased traffic congestion; increase in noise and air pollution, children's safety, roads too narrow for volume of traffic, snow/ice conditions in previous years. ([DraftOB0185](#))

39. Objects to further development on the mountain because it will detract from the view and the wildlife, create traffic congestion which has an impact on children's safety. ([DraftOB0171](#))

### **Response**

The eastern and western sides of the Plan Lands are zoned Objective A1 'to Provide for new residential communities in accordance with approved Area Plans' under the current County Development Plan (2010 – 2016), having been initially zoned under the 1998 and 2004 County Development Plans.

The principle of residential development on the Plan Lands has therefore been fully established under the County Development Plan process and the Draft LAP has been prepared in response to the zoning of the lands. In accordance with Planning and Development Legislation, the Draft LAP must be consistent with the zoning objectives of the County Development Plan and the review/amendment of development plan zonings is outside the scope of the Local Area Plan process. The LAP therefore sets out to ensure that development of the zoned lands is managed and carried out in a co-ordinated and considered manner that accords with the principles of proper planning and sustainable development and has been subject to a comprehensive public consultation programme.

The option of prioritising the amenity and character of existing residential areas together with the protection of the land adjoining the foothills of the Dublin Mountains (although this land has already been zoned for residential development) was assessed as an alternative in the SEA Environmental Report. This option would result in either the lands being de-zoned (through a review of the current Development Plan) or the incorporation of polices into the plan providing for the preservation and protection of the existing built and the rural environment by limiting development to very low densities apart from the land where permissions have already been granted. However, while the Plan Lands would remain substantially undeveloped, this would hinder the chances for the provision of greatly needed open space/parkland, community (including the primary school) and retail facilities to meet the existing population in the area. This would also hinder opportunities to create a softer edge between the urban and rural environment.

The Council are also obliged to meet the housing figures as outlined in the Regional Planning Guidelines. A portion of the Council's required housing numbers is accounted for on the subject lands. If the lands were to be de-zoned, it would remove the possibility of developing the land at medium to low densities currently favoured by developers. The Core Strategy of the County Development Plan 2010-2016 clarifies the zoning of the land and how it will meet the housing needs of the County into the future.

The rezoning of land is a function of the County Development Plan. Responses to issues raised relating to flooding aspects and traffic congestion within the Plan Lands can be found in the Water Management and Flooding Section and Vehicular Movement Section of this report, respectively (Issues 7, 26, 34).

With regards to the concerns raised about the loss of natural heritage the Green Infrastructure Strategy within the Draft Local Area Plan includes extensive policies that set out to preserve, incorporate and enhance various aspects of the area's natural heritage including tree stands, hedgerows, streams, topography, natural swales and drainage channels. These policies have been informed by the Green Infrastructure Analysis and SEA that forms part of the Draft Plan. The Draft Plan supports the utilisation of the various aforementioned heritage elements through the incorporation of historic features and archaeology, green buffers to the Dublin Mountains and the M50, green/wildlife corridors and wetland areas, in addition to tracks and trails that will permeate the Plan Lands. Furthermore, the *South Dublin County Heritage Plan* (2010) was adopted in accordance with the objectives of the County Development Plan and guidelines issued by the Heritage Council (*A methodology for Local Authority Heritage Officers on the Preparation of County/City Heritage Plans*, 2001). Heritage Plans are normally carried out at a County and City level in accordance with the guidelines.

The proposal to locate a primary school and playing pitches above the 120 metre contour was based on the relatively flat topography of the site chosen and suitability for providing a school and playing pitch without the need for cut and fill or incorporate engineered solutions that would detract from the setting of the Dublin Mountain, natural drainage or flora and fauna. The site of the proposed replacement pitches and school is subject to a zoning objective (Objective B) where education and recreation/sports uses are open for consideration

### **Recommendation**

No alteration(s) to Draft Local Area Plan recommended.

## **26 WATER MANAGEMENT AND FLOOD RISK**

See grouped response to Issues 7, 26 and 31 above.

## **27 STRATEGIC ENVIRONMENTAL ASSESSMENT**

### **Issues Raised**

1. Following adoption of the Plan, an SEA statement should summarise how environmental considerations have been integrated, how the Environmental Report has been taken into account, the reasons for adopting the Plan in light of reasonable alternatives and the measures to monitor the environmental effects of the Plan. A copy of the SEA statement should be sent to any environmental authority consulted the SEA process. ([DraftOB0037](#))
2. Where amendments to the Plan are proposed these should be screened for likely significant effects in accordance with the SEA Regulations. ([DraftOB0037](#))
3. In relation to the SEA screening report, consideration should be given to: - Describing the evolution of the Plan Area in the NTS - Including a reference to the requirement to carry out a mandatory SEA for LAPs where the target population is 5,000 or above. - Including the EPA's real time data on air quality - Establishing an up to date landscape character assessment - Establishing a County Biodiversity Plan - Including a stronger specific commitment to implement the Programme of Measures of the Eastern River Basin District Management Plan - Describing the additional measures in the 'Dodder 2' area needed to achieve good water quality status under the WFD - Taking the higher sensitivity of the Dublin Mountains into account in any proposals to increase tourism and recreation access/activity in terms of protecting environmental sensitivities. - Including an additional indicator under Population and Human Health (SEO HH1) for numbers of houses developed in areas of known flood risk. - Amending SEO S1 as follows: "To maximise and prioritise the sustainable reuse of brownfield lands". - Taking the zoning of lands into account in relation to the risk of flooding under SEO W3. - Amending SEO M2 as follows: "To maintain and improve the quality, safety and security of drinking water supplies". - Further clarifying how the full range of environmental effects of the implementation of the Plan as set out in the SEA Directives and Regulations. - Monitoring both negative and positive effects, the inclusion of the on-going review of environmental targets and indicators in the monitoring programme and the inclusion of monitoring frequencies. The Monitoring Programme should be flexible and be able to deal with the cumulative effects. ([DraftOB0037](#))
4. The Geological Survey of Ireland (GSI) has datasets on Bedrock, Geology, Quaternary Geology, Mineral deposits, Groundwater Resources, Geological Heritage, Landslides and the Irish Seabed. Maps/databases are available on the GSI website. ([DraftOB0053](#))
5. The Ballycullen – Oldcourt plan requires a Stage 2 FRA. Where there is a suspected flood risk to a proposed development, the authority should apply the appropriate level of assessment recommended in the guidelines, which may mean a Stage 3 FRA in certain cases. The PFRA draft report maps are indicative and are not suitable for a Stage 2 FRA. The CFRAMS will identify areas at significant risk and deliver draft flood maps appropriate to a Stage 2 Flood Risk Assessment (FRA) by the end of 2013. Until then, it still remains the Local Authority's responsibility to assign appropriate development in flood risk areas. ([DraftOB0133](#))
6. It is noted that Otters have not been mentioned in the SEA and it is recommended that the SEA be amended to include such protected species. SEOs for biodiversity and Flora should be amended that protected species are included. ([DraftOB0184](#))



## **Response and Recommendation**

See Environmental Report - Response to the Environmental Issues raised by the SEA Environmental Authorities in Appendix 2 of this Manager's Report.

### **28 CAR PARKING**

#### **Issues Raised**

1. The LAP should increase parking space requirements for both new dwellings and for visitors in the new developments so that they do not use the limited spaces in the Stocking Wood Estate. ([DraftOB0025](#))
2. There is a lack of parking in Stocking Wood for visitors and consideration should be given to providing additional parking for new development so that visitors do not park in Stocking Wood, additional parking for visitors in Stocking Wood and parking for visitors using the proposed tracks and trails. ([DraftOB0038](#))
3. There is a lack of parking in Stocking Wood for visitors and consideration should be given to providing additional parking for new development so that visitors do not park in Stocking Wood, additional parking for visitors in Stocking Wood and parking for visitors using the proposed tracks and trails. ([DraftOB0125](#))

#### **Response**

The policies contained within the County Development Plan Development Plan requires a balanced approach to be adopted for the provision of Car Parking and promotes public transport and walking (Policy T31: Provision of Car Parking).

The Standards and Design Criteria Section of the Draft Local Area Plan (Appendix 2) states that car parking shall be provided in line with the standards set out under the County Development Plan. This will ensure consistency with the County Development Plan, which sets out a requirement of 1-2 car spaces per dwelling thus allowing a certain level of flexibility. The car parking requirement for sports grounds and recreational facilities including parks is left to be determined on a case by case basis at planning application stage. It is stated under the Development Plan, however, that a higher standard may be required for such facilities in areas remote from public transport.

A number of parking formats are proposed under the Built Form Design Strategy and objectives of the Draft Plan (Section 5.5 and Appendix 1) and are illustrated in the Street Typologies designs for the Plan Lands (Appendix 6). The Draft Plan sets out to ensure that streetscapes are not visually dominated by parking, avoid excessive street widths, allow for the provision of visitor parking and are designed to slow traffic in the interest of pedestrian safety and residential amenity.

The Draft Plan allows for the provision of on-street parking spaces including visitor parking spaces on the Lower and Mid Slope Lands and states that such spaces should not be allocated to specific dwellings. This will provide for a more efficient and flexible turnover of spaces and visitor parking. Flexibility in terms of alternative parking arrangements is also encouraged along low speed Local Streets on the Lower Slope Lands.

A requirement for landowners/developers to provide additional parking spaces for existing residential development would go beyond the scope of the Local Area Plan and the Development Plan in terms of the viability and funding of such car spaces. The provision of surplus spaces for existing development would also run contrary to the principles of sustainable development, the provisions of the County Development Plan and guidelines on sustainable residential development and the design of streets. This would be particularly the case on the eastern side of the Plan Lands where there is a relatively high frequency bus service.

#### **Recommendation**

No alteration(s) to Draft Local Area Plan recommended.

## **29 UTILITIES**

### **Issues Raised**

1. The electrical load of the Ballycullen-Oldcourt area is served by the Old Bawn Station on the Old Bawn Road and the Ballyboden Station near Taylor's Lane. There is adequate capacity in these stations to facilitate the development proposed under the Draft Local Area Plan. ([DraftOB0051](#))

### **Response**

The submission from the ESB, which indicates that there is adequate capacity to serve the electrical load of the Plan Lands, is noted.

### **Recommendation**

No alteration(s) to Draft Local Area Plan recommended.

## **30 OLDCOURT REPLACEMENT PLAYING PITCHES**

### **Issues Raised**

1. The Council is invited to amend the final sentence of Objective SSP14 on page 46 of the Draft LAP by omitting proposals to exclude floodlighting. Increasingly, Gaelic games are being played in evenings during winter months under floodlighting and the proposed pitch at Gunny Hill would be suited to floodlighting given that it won't have surrounding residential properties. Any potential night time impacts on nocturnal wildlife can be ameliorated with modern directional lighting that can significantly reduce overspill lighting. ([DraftOB0062](#))

### **Response**

The Draft LAP excluded floodlighting from the proposed replacement playing pitches by reason of the sensitive setting of the proposed pitches on an elevated site within the foothills of the Dublin Mountains. Research carried out by Bat Conservation Ireland also indicates that the area of the Plan Lands provides good habitats for a number of bat species, which are protected under the Habitats Directive. The hedgerow boundary system in the area of the proposed pitches is substantially intact and would provide good foraging routes for bats. The hedgerows in the area form part of an uninterrupted network that continues into the Dublin Mountains, which includes forested lands.

The provision of floodlighting in this area could significantly impact on bat populations within and around the Plan Lands and the Dublin Mountains, however, it is accepted that the prohibition of floodlighting could undermine the viability of developing a new replacement pitch facility. The retention and augmentation of hedgerow boundaries could also mitigate against the impact on such proposals on bat populations and against the visual impacts of floodlighting. It is therefore recommended that Objective SSP14 of the Draft Plan be amended to allow for the provision of floodlighting subject to the submission of a Bat Survey, the augmentation and retention of hedgerow boundaries and the provision of specialist lighting that will limit any adverse impacts on bat species.

### **Recommendation**

Amend Objective SSP14 of the Draft Plan to allow for the provision of floodlighting for the proposed replacement Gunny Hill Playing Pitches subject to the submission of a Bat Survey, the retention and augmentation of hedgerow boundaries (to provide for uninterrupted wildlife corridors/foraging routes and reduce visual impacts) and the provision of specialist lighting that will limit any adverse impacts on bat species, which shall be all sufficiently demonstrated and detailed at planning application stage.

## **31 FLOOD RISK MANAGEMENT**

See grouped response to Issues 7, 26 and 31 above.

## **32 HIGHLY CONSTRAINED AREAS**

### **Issues Raised**



1. Submission on behalf of landowner (two sites comprising 20 ha total on western side) advises that it is not clear whether Option A (move 220kV transmission lines) or Option B (retain alignment of 220kV transmission lines) is the preferred development option and greater clarity should be provided in relation to the timeframe for the movement of the lines and the demarcation of responsibility. ([DraftOB0128](#))
2. Submission on behalf of landowner on western side of Plan Lands advises that there is no detail in relation to the preferred development options for the Plan Lands and queries whether the ESB has been consulted and the costs of delivering Option B. ([DraftOB0131](#))

### **Response**

Two development options for the western Plans Lands have been presented throughout the Plan and are clearly shown as two options on each of the map pages. Option A and B differ in terms of the treatment of the existing 220kV overhead electrical transmission lines that traverse the western side of the Plan Lands.

Option A involves redirecting a 500 metre (approximate) section of the overhead lines further to the south into the path of an existing wayleave of underground watermain. It is stated in Section 5.1 of the Draft Plan that this is the preferred development option given that it would free up the less elevated and more level area of the Plan Lands for development and allow for a more coherent arrangement of streets and blocks while grouping wayleave requirements for utilities into one channel. Option B represents an arrangement of streets and blocks around the current route of the overhead transmission lines and is the less preferred development option. This is also stated in Section 5.1.

It is accepted that Section 5.1 of the Draft Plan could be amended to draw further attention to the presentation of two development options including the preferred development option.

### **Recommendation**

It is recommended that a new title be added before the second paragraph in Section 5.1 to indicate that two potential development options are presented for the western side of the Plan Lands and that Option A is the preferred option.

## **33 STREET DESIGN**

### **Issues Raised**

1. The NTA recommends caution in the application of the Home Zone principle. Home Zones may be most amenable on streets where traffic is very light and where the provision of through traffic is limited. ([DraftOB0182](#))
2. Welcomes the streetscape proposed along Stocking Avenue in particular the proposal to front buildings onto streets, with consequent greater pedestrian use. ([DraftOB0141](#))

### **Response**

Section 5.5.5 of the Draft Local Area Plan states that fully integrated shared surface streets (akin to Homezones) and junctions are recommended for lightly trafficked/low speed streets and junctions. It is proposed that pedestrians, cyclists and vehicles will share the main carriageway along such streets and junctions.

Examples of such streets are detailed and illustrated in Appendix 6 (Street Typologies) for the Plan Lands for Local Streets only, which will have a design speed 15 kph.

### **Recommendation**

No alteration(s) to Draft Local Area Plan recommended.

## **34 APPROPRIATE ASSESSMENT**

### **Issues Raised**

1. AA screening is oversimplistic and only looks at direct ecological and hydrological links. Impacts from the increased population on Natura 2000 sites have not been considered in

addition to impacts on additional drinking water, treatment and discharge. It is recommended that AA screening be amended. ([DraftOB0184](#))

### **Response**

The Council's Appropriate Assessment Screening Report on the Draft LAP followed recommended guidelines and assessed potential direct and indirect effects on:

- 1) the County's own Natura 2000 sites, and
- 2) Natura 2000 sites within and bordering a 15km zone of the proposed plan lands.

No direct ecological links were identified. Any possible impact arising from hydrological links to Natura 2000 sites downstream of the Draft LAP lands (Dublin Bay Natura 2000 sites) was assessed to be negligible due to the distance from the Plan Lands and the detailed Green Infrastructure Strategy proposed for the Plan Lands. This Strategy includes a wide range of objectives to maintain and manage good water quality and run-off from the site, thereby minimising any impact on downstream Natura 2000 sites.

The Draft LAP was also considered in the context of a range of other higher level measures, all of which assist in mitigating any potential impacts of the LAP. These include the following National Plans, Regional Plans and Local Plans: *Sustainable Development – A Strategy for Ireland* (1997); *National Spatial Strategy 2002-2020*; *National Climate Change Strategy* (2000); *National Heritage Plan* (2002); *The Planning System and Flood Risk Management Guidelines* (2009); *Regional Planning Guidelines 2010 – 2020: A Platform For Change And Transport 21*; *Sustainable Residential Development In Urban Areas* (2009); *The Retail Planning Strategy For The Greater Dublin Area 2008-2016*; *South Dublin County Council Development Plan 2010 – 2016*; *Green City Guidelines* (2008).

### **Recommendation**

No alteration(s) to Draft Local Area Plan or Appropriate Assessment Screening recommended.

## **35 Green Infrastructure Appraisal**

### **Issues Raised**

A historic landscape characterisation study should be carried out for Woodstown, Oldcourt and Bohernabreena to assess the significance and value of natural heritage, landscape, archaeology and built heritage. ([DraftOB0186](#))

### **Response**

Substantial research was carried out prior to the drafting of the Plan and a summary of this research is available for perusal in the SEA and the introductory chapters of the LAP. In particular a 'Green Infrastructure Appraisal' was carried out which influenced the incorporation of existing natural heritage and archaeology (and yet to be found archaeology) within the Plan Strategies, objectives and Artist's Impression/Illustrated Layout.

There are no Protected Structures found on the Plan Lands. Items of interest, such as historic gate pillars, have been noted and the Plan seeks to incorporate these features together with any hidden features within the built environment including streetscapes and open spaces.

### **Recommendation**

No alteration(s) to Draft Local Area Plan recommended.

## APPENDIX 2: ENVIRONMENTAL REPORT

Response to the Environmental Issues arising from Environmental Authorities Submissions

following the public display of the

Draft Ballycullen Oldcourt Local Area Plan 2013-2019 and Environmental Report



18<sup>th</sup> December 2013  
Planning Department,  
South Dublin County Council

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## **Introduction**

The purpose of this Report is:

- To detail the written submissions received from the Environmental Authorities and a number of other government agencies in relation to environmental issues following the public display of the Draft Ballycullen - Oldcourt Local Area Plan and accompanying Environmental Report and Appropriate Assessment screening.
- To set out the County Manager's response to the issues raised in the submissions and
- To make recommendations on the amendment to the Draft Local Area Plan as appropriate.

## **Legislative Background**

Section 20 (3) of the Planning and Development Act 2000-2010 makes provision for the consideration of submissions or observations made under Section 20(1) of the Act in relation to draft local area plans. This provision is through the preparation of a report by the Manager of the planning authority on any submissions or observations and the submission of this report to the members of the authority for their consideration. The Manager's Report is required to list the persons or bodies who made submissions, summarise the issues raised and give the Manager's response to those issues.

Section 14(E) of the Planning and Development Act (Strategic Environmental Assessment) Regulations 2004-2011 requires that documentation made available under section 20(3) of the Act shall be accompanied by an Environmental Report, in which submissions and observations made in respect of the Environmental Report will also be taken into consideration. Therefore submissions and observations made under Section 20(1) of the Act must be considered under Section 20(3) (c) of the Act through the Manager's Report.

South Dublin County Council has prepared this report in the above legislative context.

**Key Stages in the Strategic Environmental Assessment (SEA) of the proposed Local Area Plan to date.**

Table 1  
Key SEA stages to date.

Date	Stage
26 <sup>th</sup> March 2013	The Planning Department issued formal written notification, as required by Section 14C of the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I No. 436 of 2004) <sup>1</sup> , to the Environmental Authorities i.e. the Environmental Protection Agency (EPA), the Department of the Environment, Community and Local Government (DOECLG), the Department of Arts, Heritage and the Gaeltacht (DAHG), the Department of Communications, Energy and Natural Resources (DCENR) and the Department of Agriculture, Food and the Marine that a new Local Area Plan was being prepared for the Ballycullen Oldcourt area. Submissions or observations were invited in relation to the scope and level of detail of the Environmental Report. A Scoping Issues Paper was sent to the Environmental Authorities on the 26 <sup>th</sup> March 2013 in order to facilitate their involvement in the scoping exercise.
11th April 2013	<p>The Council gave notice on the 11th April 2013 of the intention to prepare a new Local Area Plan for the Ballycullen Oldcourt area.</p> <p>It was also stated that the planning authority would carry out a Strategic Environmental Assessment [SEA] of the Local Area Plan. As a part of this process, the planning authority would prepare an Environmental Report on the likely significant effects on the environment of implementing the proposed plan. It was also stated that the local area plan would be subject to Appropriate Assessment Screening under the Habitats Directive (92/43/EEC).</p> <p>Written submissions or observations regarding the preparation of the proposed local area plan were invited from members of the public and other interested parties.</p>
28th April 2013.	Submissions were received from the Environmental Authorities in relation to the scope and level of detail to be included in the Environmental Report. The Scope of the Environmental Report was amended accordingly.
18th October 2013 to 28 <sup>th</sup> November 2013	Public Notice issued on the 18th October 2013 concerning the display of Draft Ballycullen - Oldcourt Local Area, Environmental Report and Appropriate Assessment Screening Report and submissions were sought.

<sup>1</sup> The Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I No. 436 of 2004) were amended by the Planning and Development (Strategic Environmental Assessment) (Amendment) Regulations 2011 (S.I. No. 201 of 2011) in July 2011.

## Submissions from Environmental Authorities November 2013

The table below sets out the submissions from the Environmental Authorities and a number of other government agencies in relation to environmental issues in the Draft Local Area Plan, accompanying Environmental Report and Appropriate Assessment Screening. The table also contains a response by the Manager pertaining to the item.

SUBMISSION SUMMARY	COMMENT
<p><b><u>Environmental Protection Agency</u></b></p> <p><b>Section 1: Ballycullen Oldcourt LAP</b></p> <p>In considering additional connections to the Dublin Hills it should be ensured that appropriate mitigation measures are incorporated to protect designated habitats and species. Sympathetic lighting should be considered for walking and cycling routes to minimise disturbance to bats/other mammals and the potential effects on habitats and species should be assessed.</p>	<p><b>Response:</b></p> <p>It is the intention of the Draft Local Area Plan to link tracks and trails with existing pathways/roads which will in turn link to the Hellfire Club and Dublin Mountain Way.</p> <p>The standards section of the Local Area Plan (Appendix 2 – Street Furniture and Lighting) states lighting should be sensitively designed to ensure that pedestrian and cycle paths are well lit. This includes for tracks and trails. It is also stated that due regard should be had to the impact of lighting on foraging routes for bats and bat roosts in particular and that planning applications for development in the vicinity of bat roosts and flight and feeding paths shall be accompanied by a specialised lighting strategy and design details that demonstrate mitigations measures. These issues will be assessed in a detailed manner at planning application stage.</p> <p>Whilst the above is considered sufficient to introduce mitigation measures to protect designated habitats and species, it is recommended that the 'Tracks and Trails' sections of the Plan be altered to highlight the importance of protecting species and their habitats and the importance of introducing mitigating measures to protect them through sensitive design, lighting and construction methods.</p> <p><b>Recommendation</b></p> <p>It is recommended that the 'Tracks and Trails' sections of the Plan be amended to highlight the importance of protecting species and their habitats and the introduction of mitigating measures to protect them through design, sensitive lighting and during their construction with reference to the requirements of the</p>



<p>Ensure that development is prioritised on brownfield and partially developed lands prior to Greenfield development. Development should be linked to provision of adequate critical service infrastructure. It is unclear whether all lands are proposed to be developed within the lifetime of the Plan.</p> <p>With regard to transport infrastructure, attention is brought to the NTA's GDA Transport Strategy and Draft GDA Cycle Network Plan.</p> <p>Highlight environmental sensitivities on zoning maps to ensure that the zoning and development of lands are informed by environmental setting and constraints. Consideration should be given to rezoning, dezoning or reserving strategic lands.</p> <p>Provide an overview of the Dodder CFRAMS in the context of setting the proposed SUDS measures.</p> <p><b>Environmental Report</b> Following adoption of the Plan, an SEA statement should summarise how environmental considerations have been integrated, how the Environmental Report has been taken into account, the reasons for adopting the Plan in light of reasonable alternatives and the measures to monitor the environmental effects of the Plan. A copy of the SEA statement should be sent to any environmental authority consulted the SEA process.</p>	<p>standards section of the Draft Local Area Plan.</p> <p><b>Response:</b> South Dublin County Council is not proposing to change the zoning of undeveloped lands within the boundary of the Plan Lands. These lands are already zoned as 'Objective A1' (To provide for new residential communities in accordance with approved action plans) under the current County Development Plan 2010 – 2016. The development is linked to the provision of infrastructure through the phasing strategy. The development of all of the land could happen within the life-time of the LAP i.e. 2014 – 2020.</p> <p><b>Response:</b> The plans contained within the NTA Draft Cycle Network Plan for the Greater Dublin Area including the Ballycullen Oldcourt area were examined in relation to (i) existing routes, (ii) designed routes and (iii) future routes. It is recommended that the Environmental Report be amended to reflect this.</p> <p><b>Response:</b> South Dublin County Council is not proposing to change the zoning of undeveloped lands within the boundary of the Plan Lands. These lands are already zoned as 'Objective A1' (To provide for new residential communities in accordance with approved action plans) under the current County Development Plan 2010 – 2016. The environmental sensitivities on the Proposed LAP land are indicated in the Environmental Report, Fig. 3.16, Page 54.</p> <p><b>Response:</b> An overview of the Dodder Catchment Flood Risk and Management Study (CFRAMS) is provided under the Initial Strategic Flood Risk Assessment of the Draft Ballycullen – Oldcourt LAP. However, while the Draft LAP lands are within the Dodder Catchment, no flood risk modelling was carried out for the sections of streams that traverse the Plan Lands under the CFRAMS.</p> <p><b>Response:</b> South Dublin will follow the statutory process following the adoption of the LAP i.e. Article 9 of the SEA Directive (2001/42/EC) provides that the environmental authorities and the public must be provided with an SEA Statement as soon as is practical after a plan is adopted. The SEA Statement will include information summarising:  a) how environmental considerations have been integrated into the plan,  b) how  • the environmental report,  • submissions and observations made on the Draft</p>
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<p>Where amendments to the Plan are proposed these should be screened for likely significant effects in accordance with the SEA Regulations.</p> <p>In relation to the SEA Environmental Report, consideration should be given to describing the evolution of the Plan Area in the Non Technical Summary.</p>	<p>Plan and Environmental Report, and</p> <ul style="list-style-type: none"> <li>• any transboundary consultations that have been taken into account during the preparation of the plan.</li> </ul> <p>c) the reasons for choosing the plan, as adopted, in the light of the other reasonable alternatives, and</p> <p>d) the measures selected to monitor the significant environmental effects of implementation of the plan.</p> <p><b>Response:</b> Any amendments to the Plan following public consultation will be screened for likely significant effects in accordance with the SEA Regulations.</p> <p><b>Response:</b> The evolution of the Plan Area in the absence of the Plan is included in Section 1.5.14 of the Non Technical Summary as follows;</p> <p><i>“In the absence of a Local Area Plan development would continue to expand into the already zoned greenfield lands and the opportunity to create a robust Green Infrastructure network within the LAP lands would be lost.</i></p> <p><i>Ecological connectivity would not be provided, resulting in further habitat fragmentation through the removal of hedgerows.</i></p> <p><i>The use of Sustainable Urban Drainage Systems (SuDS) in Ballycullen Oldcourt would not be prevalent; the use of underground attenuation tanks, if continued, would negatively impact on water quality and flood risk.</i></p> <p><i>If new development was not accompanied by appropriate waste water infrastructure /capacity then the likelihood of water bodies in South Dublin achieving WFD commitments would be reduced. Significant adverse impacts upon the biodiversity and flora and fauna of the County and wider impacts upon the transitional waters of the Liffey, and Dublin Bay might be expected.</i></p> <p><i>In addition, the opportunities to provide enhanced walking and cycling routes would be less likely without the provision of a Plan.</i></p> <p><i>It is not considered that the Water Supply aspects would be significantly affected in the absence of a Local Area Plan.”</i></p>
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<p>A reference to the requirement to carry out a mandatory SEA for LAPs where the target population is 5,000 or above should be included.</p>	<p><b>Response:</b> Reference to the requirement to carry out a mandatory SEA for LAPs where the target population is 5,000 or above is included in Section 1.1 of the Environmental Report as follows;</p> <p><i>“Strategic Environmental Assessment is a process which was adopted into Irish Law in 2004. While the requirement for a mandatory Strategic Environmental Assessment for Local Area Plans applies only to areas in which the population is in excess of 5,000 persons, South Dublin County Council is also of the opinion that development in the Ballycullen Oldcourt LAP area is likely to potentially have significant effects on the environment, in particular having regard to the archaeological sensitivity of the area and the presence of protected species.</i></p> <p><i>Footnote: If all of the LAP lands were developed at the higher levels of the density lands proposed the calculations would be likely to just exceed 5,000 persons.”</i></p>
<p>The submission indicated that the EPA's real time data on air quality is available on the EPA website.</p>	<p><b>Response:</b> Section 3.8.2 of the Environmental Report will be updated to include the following information on PM10 - <i>“ There have been 5 exceedances to date in 2013.”</i></p>
<p>Consideration should be given to carrying out an updated Landscape Character Assessment as the existing one was carried out in 2003 and also to establishing a County Biodiversity Plan</p>	<p><b>Response:</b> The Environmental Report commented on the incomplete Landscape Character Assessment 2003 and on the absence of a County Biodiversity Plan as follows;</p> <p><i>“There are still a number of data gaps in the Baseline information for Ballycullen Oldcourt. These are detailed below;</i></p> <ul style="list-style-type: none"> <li>• <i>The lack of a Biodiversity Plan for South Dublin.</i></li> <li>• <i>An incomplete Landscape Character Assessment for South Dublin.</i></li> <li>• <i>Lack of information on air quality</i></li> </ul> <p><i>A Biodiversity Plan will be commencing shortly and is expected to be finalised by 2013. Some, though not all, of the information gaps caused by the absence of a Biodiversity Plan and a detailed Landscape Character Assessment have been addressed in the Heritage Plan.”</i></p>

The submission suggests including a stronger specific commitment to implement the Programme of Measures of the Eastern River Basin District Management Plan and to describing the additional measures in the 'Dodder 2' area needed to achieve good water quality status under the WFD.

**Response:** Responsibility for implementing the measures rests with the Local Authorities, various Government Departments and Agencies, and other sectors such as agriculture and industry. The commitment to implement the Programme of Measures of the Eastern River Basin District Management Plan is contained in the South Dublin County Development Plan and it is considered that it is appropriate that the commitment should be included thus in the hierarchy of Plans within the County.

**“2.3.12.i Policy WD5: Water Quality Management Plans**

*It is the policy of the Council to promote the implementation of water quality management plans for ground and surface waters in the County as part of the implementation of the EU Water Framework Directive, and in accordance with the policies and objectives and programme of measures of the Eastern River Basin Management Plan and any future amendments.”*

The Draft Ballycullen LAP also includes objectives in relation to Groundwater Vulnerability and Protection.

**“5.3.2.iii Groundwater Vulnerability and Protection**  
*Groundwater vulnerability varies across the Plan Lands and generally ranges from low to high on the Lower Slopes, moderate to high on the Mid Slopes and high to extreme on the Upper Slopes of the Plan Lands. These groundwater sources should be protected during construction and development.*

*Development proposals in the vicinity of high and extreme groundwater vulnerability areas shall be accompanied by sufficient details to protect groundwater sources from pollution during construction and development phases. These details shall be in accordance with the requirements of the South Dublin Groundwater Protective Scheme (Geological Survey of Ireland, 2011). (Obj. GI8)”*

The submission suggests that consideration be given to taking the National Transport Authority (NTA) Draft Cycle Network Plan for the Greater Dublin Area into account in relation to transport infrastructure in Section 3.9.6 of the Environmental Report.

**Response:** The plans contained within the NTA Draft Cycle Network Plan for the Greater Dublin Area including the Ballycullen Oldcourt area were examined in relation to (i) existing routes, (ii) designed routes and (iii) future routes. It is recommended that the Environmental Report be amended to reflect this.

The submission suggests taking the higher sensitivity of the Dublin Mountains into account in any proposals to increase tourism and

**Response:** The approach adopted in the draft Ballycullen LAP includes preserving and maintaining existing trees and hedgerows, streams etc including in

<p>recreation access/activity in terms of protecting environmental sensitivities.</p> <p>The submission suggests including an additional indicator under Population and Human Health (SEO HH1) for numbers of houses developed in areas of known flood risk.</p> <p>The submission suggests amending SEO S1 "To maximise the sustainable re-use of brownfield lands and the existing built environment" as follows: "To maximise and prioritise the sustainable reuse of brownfield lands".</p> <p>The submission suggests taking the zoning of lands into account in relation to the risk of flooding under SEO W3.</p> <p>The submission suggests amending SEO M2 "To maintain and improve the quality of drinking water supplies "as follows: "To maintain and improve the quality, safety and security of drinking water supplies".</p> <p>The submission suggests clarifying how the full range of environmental effects of the implementation of the Plan as set out in the SEA Directives and Regulations.</p>	<p>all of the areas adjoining proposed trails and footpaths. This approach also includes the reduction of dwelling densities in the lower and upper slope land as a means of protecting sensitive landscape areas.</p> <p><b>Response:</b> South Dublin County Council's SEA Monitoring System for both the County Development Plan and all Local Area Plans is operational with the existing environmental indicator "To prevent development on lands which pose - or are likely to pose in the future – a significant flood risk". All planning applications are assessed for potential impact in potential flood risk areas.</p> <p><b>Response:</b> South Dublin County Council's SEA Monitoring System for both the County Development Plan and all Local Area Plans is operational at present with the existing environmental indicator. An opportunity for review of the indicator will be presented during the next Development Plan Review which will commence in 2014.</p> <p><b>Response:</b> South Dublin County Council's SEA Monitoring System for both the County Development Plan and all Local Area Plans is operational with the existing environmental indicator SEO W3 "To prevent development on lands which pose - or are likely to pose in the future – a significant flood risk". All planning applications are assessed for potential impact in potential flood risk areas.</p> <p><b>Response:</b> South Dublin County Council's SEA Monitoring System for both the County Development Plan and all Local Area Plans is operational at present with the existing environmental indicator. An opportunity for review of the indicator will be presented during the next Development Plan Review which will commence in 2014.</p> <p><b>Response:</b> Section 8.2 of the Environmental Report contains a full assessment of the range of effects of policies and objectives. The interactions between the SEOs and the policies and objectives of the Plan determine the effects of implementing the Plan. These effects include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects. The assessment response is given in terms of the impact on the Strategic Environmental Objectives. The assessment of the secondary, cumulative, synergistic,</p>
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The submission suggests monitoring both negative and positive effects, the inclusion of the on-going review of environmental targets and indicators in the monitoring programme and the inclusion of monitoring frequencies. The Monitoring Programme should be flexible and be able to deal with the cumulative effects.

### Geological Survey of Ireland

#### GSI Datasets

The Geological Survey of Ireland (GSI) has datasets on Bedrock, Geology, Quaternary Geology, Mineral deposits, Groundwater Resources, Geological Heritage, Landslides and the Irish Seabed. Maps/databases are available on the GSI website.

### Office of Public Works (OPW)

#### **Flood Risk Assessment**

The Ballycullen – Oldcourt plan requires a Stage 2 FRA. Where there is a suspected flood risk to a proposed development, the authority should apply the appropriate level of assessment recommended in the guidelines, which may mean a Stage 3 FRA in certain cases. The PFRA draft report maps are indicative and are not suitable for a Stage 2 FRA. The CFRAMS will identify areas at significant risk and deliver draft flood maps appropriate to a Stage 2 Flood Risk Assessment (FRA) by the end of 2013. Until then, it still remains the Local Authority's responsibility to assign appropriate development in flood risk areas.

The OPW welcomes South Dublin County

short, medium and long-term permanent and temporary, positive and negative effects is included for the evaluation of the Alternatives in Section 7 of the Environmental Report (colour coded in Blue to signify these types of impacts).

**Response:** South Dublin County Council's SEA Monitoring System for both the County Development Plan and all Local Area Plans is operational at present. An [SEA Monitoring Report](#) has been produced for the Development Plan 2010 to 2016 which indicates the success of the system. An opportunity for review of the environmental targets and indicators in the monitoring programme and the inclusion of monitoring frequencies will be presented during the next Development Plan Review which will commence in 2014.

**Response:** These datasets have been utilised for the Maps in the Environmental Report as stated in Section 3.5 Geology and Soils;

*"The Geological Survey of Ireland GSI has provided information on Bedrock, Soils, Groundwater Classification and Aquifer Vulnerability in the Ballycullen Oldcourt Area ([www.gsi.ie](http://www.gsi.ie))."*

**Response:** An Initial Strategic Flood Risk Assessment of the Ballycullen Oldcourt Local Area Plan (LAP) was undertaken by South Dublin County Council in parallel to the production of the LAP. This assessment is a requirement for Local Area Plans as set out in "The Planning System and Flood Risk Management – Guidelines for Planning Authorities 2009". The SFRA reviews the requirements of the Guidelines, the existing policies of the Regional Authority and South Dublin County Council Development Plan 2010 – 2016. All available information on potential Flood Risk i.e. the OPW's Preliminary Flood Risk Assessment modelling, the stream catchments, flooding events and site walk-through are outlined. Local area flood reports available on the OPW's National Flood Mapping website were also been reviewed. All of this information was utilised by the LAP team in drawing up a Sustainable Urban Drainage strategy for the plan lands and in formulating

Council's commitment to adhere to the 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' and the inclusion of a Strategic Flood Risk Assessment. The SFRA indicates two areas at risk of flooding and flood extent maps indicate that parts of these lands are within flood zone A and B. If the planning authority is considering proposals to change these parcels of land from open space to residential development, the planning authority will need to complete a justification test for the area and be satisfied that such development adheres to the Justification Test for Development Plans with evidence of such included in the SFRA. Should the Justification Test be passed any development in the area should be subject to a site specific floor risk assessment.

**Department of Arts, Heritage and the Gaeltacht**

The submission noted that Otters have not been mentioned in the SEA and it is recommended that the SEA be amended to include such protected species. SEOs for biodiversity and Flora should be amended that protected species are included.

a series of objectives embedded within the LAP. The Initial SFRA has been updated to incorporate information in relation to flooding events following the public consultation including additional recommended objectives.

South Dublin County Council is not proposing to change the zoning of undeveloped lands within the boundary of the Plan Lands. These lands are already zoned as 'Objective A1' (To provide for new residential communities in accordance with approved action plans) under the current County Development Plan 2010 – 2016.

While it is uncertain whether or not those areas which are identified as moderate to high risk of flooding (based on the OPW preliminary Flood Risk Assessment PFRA) or the GAA lands where flooding has already occurred would pass the Plan Justification Test (the uncertainty arises over the possibility that the flooding on the Oldcourt GAA pitches and households adjoining was caused by either the blockage or inadequate size of adjoining culverts), it is not possible to rezone or downzone land under the local area plan process as this can only happen as part of the County Development Plan process. The approach proposed by the County Council is precautionary and involves the designation of particular zones that will require Site Specific Stage 3 Detailed Flood Risk Assessment including the likely impact of any displaced flood water on third parties. If it cannot be demonstrated that both the actual and residual flooding issues can be dealt with in an acceptable manner including the impact of any displaced flood water on third parties, then it is recommended that the development of these lands shall be confined to water compatible development only (in accordance with the precautionary approach), i.e. amenity space, outdoor sports and recreation etc.

**Response:** While Otters have not been recorded from the LAP site (and were not therefore listed in the list of mammals in the Environmental Report), they are present along parts of the Dodder, a proposed Natural Heritage Area (pNHA) and within the Glenasmole Special Area of Conservation. The Otter is listed on Annex II of the EU Habitats Directive and is listed as Internationally Important in the Irish Red Data Book (Whilde 1993).



AA screening is over simplistic and only looks at direct ecological and hydrological links. Impacts from the increased population on Natura 2000 sites have not been considered in addition to impacts on additional drinking water, treatment and discharge. It is recommended that AA screening be amended.

**Recommendation:** That the following statement be included at the end of Section 3.3.3.2 Fauna (General); *"While Otters have not been recorded from the LAP site, Otters are present along parts of the Dodder, a proposed Natural Heritage Area (pNHA) and within the Glenasmole Special Area of Conservation (cSAC). The Otter is listed on Annex II of the EU Habitats Directive and is listed as Internationally Important in the Irish Red Data Book (Whilde 1993)."*

**Response:**

The Council's Appropriate Assessment Screening Report on the Draft LAP followed recommended guidelines and assessed potential direct and indirect effects on:

- 1) the County's own Natura 2000 sites, and
- 2) Natura 2000 sites within and bordering a 15km zone of the proposed plan lands.

No direct ecological links were identified. Any possible impact arising from hydrological links to Natura 2000 sites downstream of the Draft LAP lands (Dublin Bay Natura 2000 sites) was assessed to be negligible due to the distance from the Plan Lands and the detailed Green Infrastructure Strategy proposed for the Plan Lands. This Strategy includes a wide range of objectives to maintain and manage good water quality and run-off from the site, thereby minimising any impact on downstream Natura 2000 sites.

The Draft LAP was also considered in the context of a range of other higher level measures, all of which assist in mitigating any potential impacts of the LAP. These include the following National Plans, Regional Plans and Local Plans: Sustainable Development – A Strategy for Ireland (1997); National Spatial Strategy 2002-2020; National Climate Change Strategy (2000); National Heritage Plan (2002); The Planning System and Flood Risk Management Guidelines (2009); Regional Planning Guidelines 2010 – 2020: A Platform For Change And Transport 21; Sustainable Residential Development In Urban Areas (2009); The Retail Planning Strategy For The Greater Dublin Area 2008-2016; South Dublin County Council Development Plan 2010 – 2016; Green City Guidelines (2008).

Department of the Environment,

Communications and Local Government

The Department acknowledges that the draft Local Area Plan is a well written and legible document.

**Flooding**

The Flood Risk Assessment in the SEA indicates areas of pluvial and fluvial flooding, and indicates that a SUDS approach will be used. However, when these areas of flood are related to the zoning of lands, two residential areas would appear to be partially in the flood zone. This requires some clarity as residential use is indicated as a vulnerable use under Table 3.1 (Planning System and Flood Risk Management Guidelines) and there may be difficulty fulfilling the requirements of Box 4.1 of these Guidelines.

The Council should liaise with the OPW on the matter to ensure that any residential development is not unnecessarily within a flood zone. The Council is advised that where any residential zoning objective or zoning objective which permits significant residential development is located in a flood zone A or B, the relevant policies and findings of the Justification Test in the Flood Risk Management Guidelines 2009 must be applied and the details of working through of that test be included in the amendments to the Plan.

In addition, the Council is advised, in consultation with OPW, to ensure that the measures necessary for a Stage 2 Flood Risk Assessment as per the Flood Risk Management Guidelines have been applied to establish flood zones and thereby guide future development in historically zoned areas, as well as those under consideration for future development.

**Response:** Noted.

**Response:** The two areas of potential flood risk identified in the Draft LAP, the accompanying SEA Environmental Report and the Initial Strategic Flood Risk Assessment relate to lands along the Oldcourt Stream and Ballycullen Stream that the OPW has identified under its Preliminary Flood Risk Assessment Modelling for 100 year events.

South Dublin County Council is not proposing to change the zoning of undeveloped lands within the boundary of the Plan Lands. These lands are already zoned as 'Objective A1' (To provide for new residential communities in accordance with approved action plans) under the current County Development Plan 2010 – 2016.

These lands have subsequently been included in the Draft Local Area Plan and identified as being at flood risk. Further to the SUDS strategy for the Plan Lands, Objective GI7 of the Draft Local Area Plan requires all planning applications in areas at risk of potential flooding to be accompanied by a Flood Risk Assessment carried out at site specific level in accordance with *The Planning System and Flood Risk Management – Guidelines for Planning Authorities* (2009).

While it is uncertain whether or not those areas which are identified as moderate to high risk of flooding (based on the OPW preliminary Flood Risk Assessment PFRA) or the GAA lands where flooding has already occurred would pass the Plan Justification Test (the uncertainty arises over the possibility that the flooding on the Oldcourt GAA pitches and households adjoining was caused by either the blockage or inadequate size of adjoining culverts), it is not possible to rezone or downzone land under the local area plan process as this can only happen as part of the County Development Plan process. The approach proposed by the County Council is precautionary and involves the designation of particular zones that will require Site Specific Stage 3 Detailed Flood Risk Assessment including the likely impact of any displaced flood water on third parties. If it cannot be demonstrated that both the actual and residual flooding issues can be dealt

with in an acceptable manner including the impact of any displaced flood water on third parties, then it is recommended that the development of these lands shall be confined to water compatible development only (in accordance with the precautionary approach), i.e. amenity space, outdoor sports and recreation etc.

**Recommendation**

Alter Flood Risk identification maps and data (Figure 3.1 - existing Green Infrastructures and Section 3.3.4 – Water Management and Flood Risk) to identify the central branch of the Oldcourt stream that traverses the Plan Lands and adjacent GAA pitches as being at risk of flooding.

Alter Section 3.3.5 of the Draft Plan (Water Management and Flood Risk) to state that the source data for identifying the GAA pitches as being at flood risk derives from evidence of an extensive flood event submitted during the public consultation process and subsequent site visits by Council staff. It should also be indicated that evidence of flooding at the junction of Oldcourt Lane and Oldcourt Road coincides with an area of flood risk identified under the OPW preliminary flood risk data and that both reported flood events have occurred in areas where branches of the Oldcourt Stream meet culverts.

Alter Green Infrastructure Strategy map (Figure 5.2), the Overall Strategy Map (Figure 5.3) and the Artist's Impression (Figure 5.6) to identify that area around the location of the existing Oldcourt GAA pitches and the area identified by the OPW's PFRA maps as being at potential risk of flooding.

Insert a specific objective and map into Appendix 1 (specific objectives) that identifies the area of potential flood risk around the existing Oldcourt GAA pitches and requires any proposed development that is potentially sensitive to flooding to be subject to the sequential approach of avoid, substitute, justify, mitigate and (where the Justification Test has been passed) manage flood risks in accordance with The Planning System and Flood Risk Management–Guidelines for Planning Authorities (2009). These areas will require Site Specific Stage 3 Detailed Flood Risk Assessment including the likely impact of any displaced flood water on third parties. Include a requirement that if it cannot be demonstrated that both the actual and residual flooding issues can be dealt with in an acceptable manner including the impact of any displaced flood water on third parties, then the development of these lands shall be confined to water compatible development only (in accordance with the precautionary approach), i.e. amenity space , outdoor sports and recreation etc. spaces that include SUDS elements that integrate with the SUDS strategy of the Plan Lands.

## Recommendation Summary

The following recommendations are proposed to the text within the **Local Area Plan**:

### Recommendation

It is recommended that the 'Tracks and Trails' sections of the Plan be amended to highlight the importance of protecting species and their habitats and the introduction of mitigating measures to protect them through design, sensitive lighting and during their construction with reference to the requirements of the standards section of the Draft Local Area Plan.

### Recommendation:

Alter Flood Risk identification maps and data (Figure 3.1 - existing Green Infrastructures and Section 3.3.4 – Water Management and Flood Risk) to identify the central branch of the Oldcourt stream that traverses the Plan Lands and adjacent GAA pitches as being at risk of flooding.

Alter Section 3.3.5 of the Draft Plan (Water Management and Flood Risk) to state that the source data for identifying the GAA pitches as being at flood risk derives from evidence of an extensive flood event submitted during the public consultation process and subsequent site visits by Council staff. It should also be indicated that evidence of flooding at the junction of Oldcourt Lane and Oldcourt Road coincides with an area of flood risk identified under the OPW preliminary flood risk data and that both reported flood events have occurred in areas where branches of the Oldcourt Stream meet culverts.

Alter Green Infrastructure Strategy map (Figure 5.2), the Overall Strategy Map (Figure 5.3) and the Artist's Impression (Figure 5.6) to identify that area around the location of the existing Oldcourt GAA pitches and the area identified by the OPW's PFRA maps as being at potential risk of flooding.

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The following recommendations are proposed to the text within the **Environmental Report**.

**Recommendation:** That the following statement be included at the end of Section 3.3.3.2 Fauna (General); *"While Otters have not been recorded from the LAP site, Otters are present along parts of the Dodder, a proposed Natural Heritage Area (pNHA) and within the Glenasmole Special Area of Conservation (cSAC). The Otter is listed on Annex II of the EU Habitats Directive and is listed as Internationally Important in the Irish Red Data Book (Whilde 1993)."*

**Recommendation:** Section 3.8.2 of the Environmental Report will be updated to include the following information on PM10 - *"There have been 5 exceedances to date in 2013."*

**Recommendation:** Section 3.9.6.4 of the Environmental Report will be updated to include the following at the start of the paragraph; *"The plans contained within the NTA Draft Cycle Network Plan for the Greater Dublin Area including the Ballycullen Oldcourt area were examined in relation to (i) existing routes, (ii) designed routes and (iii) future routes."*

### **Next Stage in the SEA Process**

The submissions from the Environmental Authorities received as part of the public consultation exercise will inform amendments to policies, objectives and strategy within the Draft Local Area Plan as recommended in the Manager's Report.

Proposed amendments to the Plan recommended by the Elected Members at this stage will be assessed for environmental impact. Any adopted amendments which propose to materially alter the Plan will be put on public display to allow for further comment. An environmental assessment of any proposed variation will be part of this display.

### APPENDIX 3: PRE-DRAFT AND DRAFT PUBLIC CONSULTATION SESSIONS



