

CHIEF EXECUTIVE'S REPORT

ON PRE-DRAFT CONSULTATION, APRIL 2020

Dún Laoghaire-Rathdown County Development Plan 2022-2028

Review of Dún Laoghaire-Rathdown County Development Plan 2016-2022 &

Preparation of a New County Development Plan 2022-2028

Chief Executive's Report on Pre – Draft Consultation Process

Report to Council Under Section 11 (4) Of the Planning and Development Act 2000, (as amended).

April 2020

Part 1: Introduction to Chief Executive's Report

Table of Contents

	Page No.
Part 1	
Introduction to the Chief Executive's Report	
Table of Contents	2
Acronyms	6
1 Introduction	8
1.1 Format of Report	9
1.2 Legislative Background for the Chief Executive's Report	10
1.3 Pre-Draft Consultation Process	11
1.4 Challenges	12
1.5 Overview of nature of submissions received and recommendations made	13
2 Draft Core Strategy	18
2.1 Directions and the Draft Core Strategy	18
2.2 Strategic Overview	18
2.3 Population Targets and Land Availability	20
2.4 Draft Core Strategy	21
Part 2	
Summary of Submissions by The Eastern Midlands Regional Authority, The National Transport Authority and the Office of the Planning Regulator and the Executive's Opinion & Recommendations	
2.1 Eastern and Midland Regional Authority	23
2.2 National Transport Authority (NTA)	29
2.3 Office of the Planning Regulator (OPR)	32
Part 3	
Summary of Submissions & the Executive's Opinion & Recommendations	
Section 1	
Strategic Overview	39
1.1 Strategic Vision	40
1.2 Core Strategy	41
1.3 Settlement Strategy	44

		Page No.	
	1.4	Enabling Infrastructure	49
	1.5	Local Area Plans	49
Section 2	Climate Action		51
	2.1	Strategic/general Climate Action issues	52
	2.2	Energy in Buildings	56
	2.3	Renewable Energy	58
Section 3	People, Home & Place		61
	3.1	Residential Development	62
	3.2	Social Inclusion	74
	3.3	Community Infrastructure	74
	3.4	Urban Design & Placemaking	83
Section 4	Sustainable Travel and Transport		88
	4.1	Sustainable Travel	89
	4.2	Walking & Cycling	95
	4.3	Public Transportation	99
	4.4	Roads	103
Section 5	Enterprise and Employment		113
	5.1	Location of Employment	114
	5.2	Strategy, Policies and Objectives	115
	5.3	Tourism	118
Section 6	Retail		123
	6.1	Strategic Context	124
	6.2	Retail Strategy and Sustainability	127
	6.3	Existing Retail Hierarchy	129

		Page No.
Section 7	Green County	132
	7.1 Landscape Character	133
	7.2 Open Space	140
	7.3 Recreation	146
	7.4 Biodiversity	148
Section 8	Environmental Infrastructure and Flooding	152
	8.1 Environmental Infrastructure	153
	8.2 Energy Infrastructure	157
	8.3 Flooding	159
	8.4 Major Accidents	164
	8.5 Pollution	164
	8.6 Coastal Protection	169
Section 9	Archaeological and Architectural Heritage	172
	9.1 Archaeological Heritage	173
	9.2 Architectural Heritage	177
	9.3 Record of Protected Structures (RPS)	179
	9.4 Modifications to Protected Structures and historic buildings	181
	9.5 Architectural Conservation Areas	183
	9.6 Miscellaneous	187
Section 10	Development Management	189
	10.1 Residential Development	190
	10.2 Transportation	193
	10.3 Open Space	194
	10.4 Retail	196
	10.5 Environmental Infrastructure	197
Section 11	Strategic Environmental Assessment (SEA) & Appropriate Assessment (AA)	198
	11.1 Strategic Environmental Assessment (SEA)	199
	11.2 Appropriate Assessment (AA)	201

	Page No.	
Section 12	Appendices	203
12.1	Sandyford Urban Framework Plan (SUFPP)	204
12.2	Dún Laoghaire Urban Framework Plan (DLUFP)	207
12.3	Building Height Strategy	215
Section 13	Non-Specific/Generic Zoning Objectives	217
13.1	Specific Objectives	218
13.2	Land Use Zoning	222
Section 14	Miscellaneous	226
14.1	Communication	227
14.2	Agriculture	228
14.3	General	228
Part 4	Appendices to Chief Executives Report	
Appendix	A Persons/Bodies Directly Informed	233
	B Submissions Received in Numerical Order	236
	C Principal International, National, Regional and Local Policy Documents, Guidelines and Plans that will Help Inform and Guide the Preparation of the New Development Plan	243
	D Mandatory Requirements for Development Plan	251
	E Development Plan Timetable	254
	F Pre-Draft Public Consultation	256

Acronyms

AA:	Appropriate Assessment	DLUF:	Dún Laoghaire Urban Framework Plan
ABTA:	Area Based Transport Assessment	DMP:	Dublin Mountain Partnership
ACA:	Architectural Conservation Area	DMURS:	Design Manual for Urban Roads and Streets
AFA:	Area for Further Assessment (Flooding)	DTTaS:	Department of Transport, Tourism and Sport
AHB:	Approved Housing Body	ECFRAM:	Eastern Catchment Flood Risk Assessment and Management Plan
BER:	Building Energy Rating	EIA:	Environmental Impact Assessment
BID:	Business Improvement District	EIAR:	Environmental Impact Assessment Report
BRT:	Bus Rapid Transit	EMRA:	Eastern and Midlands Regional Assembly
CARO:	Climate Action Regional Office	EPA:	Environmental Protection Agency
CCAP:	Climate Change Action Plan	ESB:	Electricity Supply Board
CDP:	County Development Plan	EU:	European Union
CFRAM:	Catchment Flood Risk Assessment and Management	EV:	Electric Vehicle
CMP:	Construction Management Plan	GAA:	Gaelic Athletic Association
CNG:	Compressed Natural Gas	GDA:	Greater Dublin Area
CPO:	Compulsory Purchase Order	GI:	Green Infrastructure
CSO:	Central Statistics Office	GSI:	Geological Survey Ireland
DAP:	Drainage Area Plan	HNDA:	Housing Need and Demand Assessment
DCHG:	Department of Culture, Heritage and the Gaeltacht	HSE:	Health Service Executive
DART:	Dublin Area Rapid Transit	IADT:	Institute of Art, Design and Technology
DC:	District Centre	LAP:	Local Area Plan
DCC:	Dublin City Council	LCDC:	Local Community Development Committees
DEBP:	Dublin Eastern Bypass	LECP:	Local Economic and Community Plan
DES:	Department of Education and Skills	LEO:	Local Enterprise Office
DHPLG:	Department of Housing, Planning and Local Government (previously DHPCLG, DECLG, DEHLG)	LPG:	Liquefied Petroleum Gas
DLR:	Dún Laoghaire-Rathdown County Council	LSSIF:	Large Scale Sport Infrastructure Fund
DLR JPC:	Dún Laoghaire-Rathdown Joint Policing Committee	MASP:	Metropolitan Area Strategic Plan
DLR LCDC:	Dún Laoghaire-Rathdown Local Community Development Committee	MTC:	Major Town Centre
DLR CYPSC:	Dún Laoghaire-Rathdown Children and Young People's Services Committee	NC:	Neighbourhood Centre
		NDP:	National Development Plan
		NHA:	Natural Heritage Area

NMPF:	National Marine Planning Framework	SPPR:	Specific Planning Policy Requirement
NPF:	National Planning Framework	S2S:	Sutton to Sandycove Cycleway
NPO:	National Planning Objective	SUDS:	Sustainable Urban Drainage Solutions
NPWS:	National Parks and Wildlife Service	SUFP:	Sandyford Urban Framework Plan
NSO:	National Strategic Outcome	TEN-T:	Trans European Transport Network
NTA:	National Transport Authority	TII:	Transport Infrastructure Ireland
NZEB:	Nearly Zero Energy Building	UCD:	University College Dublin
OPR:	Office of the Planning Regulator	UN:	United Nations
OPW:	Office of Public Works	UNESCO:	UN Educational, Scientific and Cultural Organization
PCMSP:	Pilot Coastal Monitoring Survey Programme	URDF:	Urban Regeneration and Development Fund
PDA:	Planning and Development Act, 2000 (as amended)	WCC:	Wicklow County Council
PFRA:	Preliminary Flood Risk Assessment	WWTW:	Wastewater Treatment Works
PPN:	Public Participation Network		
PV:	Photovoltaic		
QBC:	Quality Bus Corridor		
RMP:	Record of Monuments and Places		
ROW:	Right of Way		
RPO:	Regional Policy Objective		
RSES:	Regional Spatial and Economic Strategy		
RSO:	Regional Strategic Outcome		
RPS:	Record of Protected Structures		
SAC:	Special Area of Conservation		
SBD:	Sandyford Business District		
SDCC:	South Dublin County Council		
SDZ:	Strategic Development Zone		
SEA:	Strategic Environmental Assessment		
SEAI:	Sustainable Energy Authority of Ireland		
SEC:	Sustainable Energy Community		
SFRA:	Strategic Flood Risk Assessment		
SHD:	Strategic Housing Development		
SLO:	Specific Local Objective		
SPA:	Special Protection Area		
SPC:	Strategic Policy Committee		

1. Introduction

Dún Laoghaire-Rathdown County Council (DLR) is in the process of preparing a New County Development Plan. The first stage of the process was the Pre-Draft consultation, where notice was given that the [County Development Plan, 2016-2022](#) is to be reviewed and a New Plan made for the County. **This report is a summary of the 151 submissions received and the Chief Executives response to same.** The structure of this report is set out in the [Planning and Development Act, 2000](#) as amended (Section 11(4)(b)). The report must be submitted to the Elected Members for their consideration. Following consideration of this report, the Elected Members of the Planning Authority may issue directions regarding the preparation of the Draft Plan. In accordance with Section 11(4)(d) of the Act, any such directions shall be strategic in nature, consistent with the Draft Core Strategy, shall take account of statutory obligations of the Local Authority in the area and any relevant policies or objectives for the time being of the Government or any Minister of the Government. The Chief Executive shall comply with any such directions.

In issuing directions, the Members are restricted to considering the proper planning and sustainable development of the area to which the Development Plan relates. After this stage, the Draft Development Plan will be prepared and submitted to the Elected Members for their consideration. This will be in late Autumn 2020.

Overall, the level of engagement at this stage was high and predominantly positive. It was abundantly clear at the open days, that the general public, who live and work in the County, form a committed and passionate community, who care deeply about the towns and villages in the County. There was much praise expressed in relation to our parks, open spaces, recreational amenities, community and library services, increased provision of housing and the Councils real commitment to Climate Action. Whilst issues relating to the built form of development in

the County and traffic were also raised, there was a keen awareness and understanding that in addressing Climate Action compact growth is important.



Fig 1: Some DLR policy documents that sit alongside the County Development Plan

DLR wish to take this opportunity to sincerely thank all those who made submissions, all those who enthusiastically gave of their time to attend open days, and engaged with officials and also the Elected Members, for their contribution to the open days and the overall process

The area of Climate Action has garnered much support in the submissions received, and whereas in the past the Development Plan led as the County's policy document in relation to Climate Action, the adoption by the Council of the DLR Climate Change Action Plan (CCAP) in 2019, means that the Development Plan will now support the delivery of that Plan through appropriate land use policy. It is considered that the principles of proper planning and sustainable development such as aligning development with public transport options and supporting compact growth, will all assist in delivering on climate action. There are other DLR policy documents which sit alongside the Plan such as, the Corporate Plan, the Local Economic and Community Plan (LECP), the Tourism Strategy, the Biodiversity Plan, and the Heritage Plan. (See Appendix C for a full list of local DLR policies). The County Development Plan will align with these policies.

1.1 Format of this report

Part 1:

'Introduction to Chief Executive's Report'

This consists of:

- Legislative requirements.
- Overview of Pre-Draft consultation process.
- Challenges – including Impact of Covid-19 Emergency.
- Overview of nature of issues raised.
- Draft Core Strategy.

Part 2:

'Summary of Submissions by The Eastern Midlands Regional Authority, The National Transport Authority and the Office of the Planning Regulator and the Executive's Opinion & Recommendations'

This consists of

- A summary of the issues raised in the written submissions received from the:
 - Office of the Planning Regulator (OPR).
 - Eastern and Midland Regional Authority (EMRA).
 - National Transport Authority (NTA).

(This 'separation' of the submissions in relation to both EMRA and the NTA is a requirement of the legislation).

- The Executive's opinion on the issues raised are then given having regard to the proper planning and sustainable development of the area, the statutory obligations of any Local Authority, any relevant policies or objectives for the time being of the Government or of any Minister of the Government.
- Recommendation by the Chief Executive on any policies to be contained in the Draft County Plan.
- The recommendations are in **blue bold text**.
- Where an item is not a County Development Plan issue, this is **underlined in bold black text**.

Part 3:

'Summary of Submissions & the Executive's Opinion & Recommendations'

This consists of:

- A summary of the issues raised in the written submissions broken down by theme.
- The Executive's opinion on the issues raised are then given having regard to the proper planning and sustainable development of the area, the statutory obligations of any Local Authority, any relevant

policies or objectives for the time being of the Government, or of any Minister of the Government.

- Recommendation by the Chief Executive on any policies to be contained in the Draft County Plan.
- The recommendations are in **blue bold text**.
- Where an item is not a County Development Plan issue, this is **underlined in bold black text**.

Part 4: Appendices to Chief Executives Report:

- Appendix A consists of a list of persons /bodies who were directly informed of the Pre-Draft 'Have Your Say' phase of the overall Development Plan process including the prescribed bodies, post primary school principals, circa 600 individual residents' associations, community groups, business interests and other stakeholder organisations.
- Appendix B lists those persons /bodies that made written submissions. A link to all submissions is provided.
- Appendix C lists the principal National, Regional and Local policy documents and guidelines that will inform and guide the preparation of the new Development Plan.
- Appendix D sets out the matters that must be included in a Development Plan, as well as those matters that may be included.
- Appendix E sets out the statutory time frame henceforth for the preparation of the new County Development Plan (This may alter due to the ongoing health pandemic).
- Appendix F sets out details of advertising and methods employed during the public consultation process.

Explanatory Note:

The Chief Executive's report contains a submission number alongside each submission summary which contains a targeted hyperlink (e.g. **A0022**) allowing the reader to access each submission in full online.

For the purposes of this report, the term 'current Plan refers to the County Development Plan 2016-2022 and the term 'Draft Plan' refers to the Draft County Development Plan, 2022-2028.

This report is submitted to the Elected Members of Dún Laoghaire-Rathdown for their consideration.

1.2 Legislative Background for the Chief Executive's Report

Section 11 (4)(a) of the Planning and Development Act, 2000 (as amended), sets out the requirements in relation to the preparation of a Chief Executive's Report. The Chief Executive's Report is required to deal with any submissions or observations received on foot of the notifications and consultations (carried out under Section 11 (2) and (3) of the Act), with, inter alia, the public, prescribed bodies, service providers and the Board.

In accordance with Section 11 (4)(b) the Chief Executive's Report must:

- List the persons or bodies who made submissions or observations, as well as any persons or bodies consulted.
- Summarise the issues raised in the submissions and during the consultations, where appropriate, but shall not refer to a submission relating to a request or proposal for zoning of particular land for any purpose.
- Give the Opinion of the Chief Executive on the issues raised. In this regard the Chief Executive's opinion must take into account (a) the

proper planning and sustainable development of the area, (b) the statutory obligations of any Local Authority in the area, and (c) any relevant policies or objectives of the Government or any Minister of the Government.

- (iv) Finally, the Report shall state the Chief Executive's Recommendations on the Policies to be included in the Draft Development Plan.
- (v) The Chief Executive's Report must then be submitted to the Elected Members of the Planning Authority or a committee of the Planning Authority for their consideration.

Following consideration of the report the members may then issue Directions to the Chief Executive regarding the preparation of the Draft Development Plan (Section 11(4)(d)). These Directions shall be strategic in nature, be consistent with the Draft Core Strategy and shall take account of the statutory obligations of any Local Authority in the area and any relevant policies or objectives of the Government or of any Minister of the Government.

In issuing Directions, Section 11(4)(f) of the Act states that the Members shall be restricted to considering the proper planning and sustainable development of the area to which the Development Plan relates.

1.3 Pre-Draft Consultation Process

1.3.1 Description of Notification Procedures/Consultation Process

The Pre-Draft ('Have Your Say') consultation stage ran from 3rd January until 28th February 2020. A 'Have Your Say' document was published and made available in public libraries, at County Hall and in the Dundrum office and on the Council's [website](#). In addition to the booklet, a

summarized version of the 'Have Your Say' document was published as a [Story Map](#). This informed the public consultation process.

- (i) A non-statutory Briefing Sessions for all Councillors was held on the 4th November 2019 prior to the review kick-off. This presentation was also circulated to all Councillors.
- (ii) Publication of newspaper advertisements inviting written submissions. Adverts appeared in both national press and local newspapers.
- (iii) Targeted 'press release' via Social Media (Instagram, Twitter & Facebook) and the dlr Times.
- (iv) Distribution of 'Have Your Say' link, containing an electronic flipbook to more than circa 600 individual residents' associations, community groups, business interests and other stakeholder organisations.
- (v) Six Public Open Days, one in each Electoral Area - attended by Council Planning Officials – to disseminate information, clarify queries and note any comments or observations made.
- (vi) Details of the Plan Review and 'Have Your Say' booklet and Storymap placed on the Council's website.

1.3.2 Open Days

Six public open days were organised at which Planning Officials were present to disseminate relevant information, clarify queries from the general public and other organisations and to note any comments and observations made by attendees. Observations raised during the open day consultations aligned with those raised in submissions. The open days were held in each electoral area as follows:

- Dún Laoghaire, Tuesday 21st February 2020, 2.00pm – 8.00pm
- Dundrum, Thursday 23rd January 2020, 2.00pm – 8.00pm
- Blackrock, Tuesday 28th January 2020, 2.00pm – 8.00pm
- Stillorgon, Thursday 30th January 2020, 2.00pm – 8.00pm

- Shankill, Tuesday 11th February 2020, 2.00pm – 8.00pm
- Ballyogan, Thursday 13th February 2020, 2.00pm – 8.00pm

1.4.3 Public Access to Submissions

All written submissions (including attachments) are available, in full, [online](#). This enables members of the general public, and others, to view each submission electronically.

1.3.4 Website

There were 5435 hits on this section of the Council's website between the 3rd January and 28th February 2020. This was a significant increase on the 1199 hits at this stage of the process in 2014.

1.4 Challenges

The new Draft County Development Plan is being prepared at a point in time when there has been significant evolution of policy as set out in the [National Planning Framework \(NPF\)](#), the [Regional Spatial and Economic Strategy \(RSES\)](#) and the Metropolitan Area Spatial Plan (MASP). The NPF includes the requirement to prepare a Housing Needs Demand Assessment (HNDA) to inform the Housing Strategy. This is to provide detail in respect to the mix of residential unit type required. The MASP requires the HNDA to be prepared jointly by the Metropolitan Local Authorities of which DLR is one. The Planning Authority are awaiting imminent Section 28 Guidance on County Development Plans and the HNDA which will inform the preparation of the HNDA by the Metropolitan Authorities.

The timing of these may not align with the preparation timeframe for DLR's County Development Plan and may result in the Plan having to be updated by way of a variation of the new Plan.

There are a number of other policy areas where legislation is evolving - namely the whole area of marine planning.

dlr has seen a significant upturn in construction activity in recent years and while the Covid-19 pandemic has caused this construction activity to stall at time of writing, it is too soon to predict the short / medium term impact of this current situation within the County. However, it does not detract from the need for a robust policy document that will shape the future growth of our County to be put in place.

In the context of the current health measures arising from the COVID-19 pandemic the government have put in place an order under Section 251A of the Planning and Development Act, 2000 (as amended) from Sunday 29th March to Saturday 9th May inclusive. An order under Section 251A means that time periods requirements for the Plan process are to be disregarded for the duration of the specified time period. The Department of Housing, Planning and Local Government have advised that the period in which all plan public consultation, Council briefing, and meeting activity must take place is extended for the period covered by the order.

dlr is at the stage of preparation of the Chief Executive's report which is not a public consultation or Members briefing and meeting stage. Therefore, work was able to continue on the preparation of this report and its issuing to members on the 24th April 2020 with the expectation that consideration by the Members will be complete by early July.

1.5 Overview of nature of submissions received and recommendations made.

Section	Main Issues Raised	Recommendations for Draft Plan
Section 1: Strategic Overview	<p>A range of submissions were made regarding the strategic overview of the County Development Plan including recommendations in relation to the overall vision and sustainable development of the County. The Core Strategy was a primary focus of submissions with an overarching emphasis on applying an evidence-based approach to land-use zoning. In terms of the settlement strategy there was general support for a compact growth agenda, and the avoidance of urban sprawl.</p>	<p>In preparing the Draft Plan it is recommended that the following is examined:</p> <ul style="list-style-type: none"> • The preparation of a strategic vision and policy objectives that align, as appropriate, with UN Sustainable Development Goals, the National Strategic Outcomes of the NPF, and the Regional Strategic Outcomes (RSO's) of the RSES. • An evidence-based Core Strategy informed by key data sets including land availability, demographics, population and housing targets, and planning and construction activity. • A robust settlement strategy that delivers strategic development in areas identified in the Metropolitan Area Strategic Plan (MASP). • Policy objectives that support compact growth.
Section 2: Climate Action	<p>The main issues raised included the desire that the County Development Plan should address Climate Action and biodiversity and the need to focus on mitigation of and adaptation to climate change. In addition, submissions were received supporting renewable energy.</p>	<p>It is recommended that the Draft Plan incorporate the following:</p> <ul style="list-style-type: none"> • Climate Action as an overarching cross cutting theme. • Inclusion of a policy objective to support the DLR CCAP. • Inclusion of policy objectives to support the work of other public bodies in the energy sphere e.g. SEAI, CARO and EMRA. • Inclusion of policy objectives to support improved energy efficiency and conservation. • Inclusion of policy objectives to support renewable energy including wind energy.
Section 3: People, Home & Place	<p>Main issues raised included ensuring that there is enough physical, social and community infrastructure in place to support both existing and new residential development, ensuring that there is good housing choice with opportunities to downsize and allow all residents, including older people and those with disabilities, to be and remain part of a community, ensuring that the County Development Plan incorporates the Healthy Ireland strategy, the</p>	<p>In preparing the Draft plan it is recommended that the following policies are examined:</p> <ul style="list-style-type: none"> • Policy objectives aimed at providing high-quality places to live. • Policy objectives aimed at ensuring adequate community infrastructure is provided in tandem with residential development, e.g. requirement of a community audit. • Policy objectives aimed at supporting the protection of

Section	Main Issues Raised	Recommendations for Draft Plan
	provision and protection of schools and their facilities in the County and high quality design of buildings and streets.	schools, development of new schools, childcare facilities, healthcare facilities, community facilities etc., as required. <ul style="list-style-type: none"> • Policy objectives aimed at ensuring good housing choice is available. • Policy objectives aimed at healthy placemaking.
Section 4: Sustainable Travel and Transport	The main issues raised included the need to limit car born commuting, spending on roads, the need to invest in the active modes of cycling and walking and public transport, the need to look at revising car parking standards and electric car charging. Concerns with regard to the capacity of the Luas were raised along with the requirement to improve bus routes and facilities. The need to provide some enabling transport infrastructure to unlock the development potential in the County was also raised. There were specific submissions on the Eastern bypass, traffic in Stepside/Ballyogan and the N11/M11 upgrade	Recommendations for the Draft Plan are as follows: <ul style="list-style-type: none"> • Inclusion of the Avoid-Shift - improve - approach which aims to avoid the need to travel, shifting to more environmentally friendly modes and thereby improving energy efficiency. • Inclusion of policy objectives that: • provide enabling transport infrastructure, • manage travel demand by ensuring land use and transport policies and practices are aligned as part of the planning process, • support SMARTER Travel and the NTA's 'Transport Strategy for the Greater Dublin Area 2016-2035', • support walking and cycling and public transport • Review of development management standards on car parking.
Section 5: Enterprise and Employment	In terms of enterprise and employment, a range of submissions made recommendations regarding the growth of economic activity in the County including: appropriate locations for enterprise and employment; support for start-ups, innovation and entrepreneurship; support for the creative sectors; development of education, training and skills; the promotion of remote working; inclusive employment opportunities; the growth of sustainable tourism; and, the promotion of DLR as 'THE' place to live and work.	In preparing the Draft Plan it is recommended that the following is examined: <ul style="list-style-type: none"> • The requirement for, and identification of, appropriate locations for employment development. • Policy objectives aimed at supporting enterprise and employment in the County across a wide range of sectors. • Policy objectives that support the delivery of education, training and skills development. • Policy objectives that support employment opportunities for all. • Policy objectives that promote sustainable tourism and support the delivery of the DLR Tourism and Marketing Plan

Section	Main Issues Raised	Recommendations for Draft Plan
		2017-2022, or any update thereof. <ul style="list-style-type: none"> • Strategic level support for the delivery of the DLR Local Economic and Community Plan.
Section 6: Retail	Main issues raised included the current and future provision of adequate retail floorspace of different types, the retail hierarchy and the role of town and village centres, accessibility to retail centres by sustainable transport, the design of retail units, support for small businesses and local shops, casual trading and local markets, as well as the existing and future status and role of Dún Laoghaire and Dundrum Town centres as retail destinations.	In preparing the Draft Plan, it is recommended that the following policies are examined: <ul style="list-style-type: none"> • Policy objectives aimed at addressing the ongoing changes in the nature and character of retail, including the need to facilitate a vibrant range of uses which enhance the 'experiential' focus of contemporary retailing. • Policy objectives aimed at confirming and strengthening the retail hierarchy. • Policy objectives aimed at ensuring that new retail is of an appropriate scale, that it is well designed and that it is easily accessible by sustainable modes of transport. • Policy objectives aimed at supporting the role played by town centres such as Dún Laoghaire and Dundrum which goes beyond simply retail.
Section 7: Green County	Main issues raised included recognising and promoting the importance of green infrastructure, landscape, the coast, trees, biodiversity, rights of way, wildlife corridors, parks and green spaces, ensuring provision of additional sporting facilities and promotion of sporting facilities and play facilities for all	In preparing the Draft plan it is recommended that the following policies are examined: <ul style="list-style-type: none"> • Policy objectives aimed at protecting and enhancing all aspects of the existing Green County • Policy objectives on rights of way and walking routes, • Policy objectives aimed at protecting the existing green infrastructure to mitigate climate change e.g. Draft Tree Policy and updated 'DLR Tree Strategy' and Hedgerow Survey. • Policy objectives aimed at supporting the recreational, sports and play amenities of the County. • Policy objectives aimed at updating the Biosphere management of the Count and the development of a Wildlife Corridor Plan. •

Section	Main Issues Raised	Recommendations for Draft Plan
Section 8: Environmental Infrastructure and Flooding	Main issues raised included flooding including some site-specific submissions, timely provision of enabling infrastructure, water quality, telecommunications and energy efficiency.	It is recommended that the Draft Plan include: <ul style="list-style-type: none"> • Policy objectives to ensure development is matched with provision of enabling water and waste water infrastructure. • Retention of Specific Local Objective (SLO) 126 which limits development in Rathmichael until groundwater issues are resolved. • Inclusion of Policy objectives on energy to reflect the RSES • Review of current Strategic Flood Risk Assessment (SFRA).
Section 9: Archaeological and Architectural Heritage	Main issues raised included the protection of, and access to, archaeological monuments, the inclusion of additional buildings on the Record of Protected Structures (RPS), the reuse of Protected Structures and efforts to improve their energy efficiency, the designation of new Architectural Conservation Areas (ACAs), the built heritage of specific areas such as Dundrum, Dalkey and UCD, and the current and future public uses of historic houses (such as Marlay, Fernhill and Cabinteely House).	It is recommended that the following policies are examined: <ul style="list-style-type: none"> • Policy objectives aimed at protecting archaeological heritage. • Policy objectives aimed at protecting architectural heritage including specific policies relating to structures on the Record of Protected Structures and to development in Architectural Conservation Areas • The inclusion of additional structures to the RPS, having regard to the ongoing update of the National Inventory of Architectural Heritage (NIAH). • Designation of additional areas as ACAs. • Policy objectives aimed at facilitating community uses of heritage structures under Council ownership, while continuing to protect these structures in accordance with best practice.
Section 10: Development Management	Main issues raised including ensuring that the County Development Plan provides enough detail with respect to development management for both developers and residents, providing guidance on apartment development, living over the shop, sub-division of existing units, promotion of green roofs, provision of adequate open space and car parking standards.	It is recommended that the following policies are examined: <ul style="list-style-type: none"> • Policy objectives with respect to Development Management, which will be updated in line with all National, Regional and Local policy guidance. • Policy objectives aimed at supporting the conversion of existing housing stock to accommodate larger households. • Policy objectives aimed at supporting 'green roof' and 'blue roof' proposals for apartment schemes, as required. • Policy objectives aimed at ensuring high quality open spaces, including children's play, within apartment developments.

Section	Main Issues Raised	Recommendations for Draft Plan
Section 11: SEA & AA	Submission raise several items for inclusion in the Strategic Environmental Assessment (SEA) & Appropriate Assessment (AA) process.	Issues raised in submissions will inform the SEA/AA process.
Section 12: Appendices	Sandyford Urban Framework Plan (SUFPP) Submissions request expansion of the mixed-use zoning area by way of additional residential, examination of retail, educational and open space provision in the plan area	It is recommended that elements of the SUFP be reviewed and updated.
	Dún Laoghaire Urban Framework Plan (DLUFP) Submissions request that the town and harbour are regenerated in a manner that will make it more vibrant and inviting to new residents and visitors.	It is recommended that the DLUFP be reviewed and updated, that the SLO to prepare and Local Area Plan (LAP) for Dún Laoghaire be retained and that the various SLOs pertaining to Dún Laoghaire be reviewed.
	Building Height Strategy Submission raised issues in relation to height – some in support of height and some opposed to height.	It is recommended that the existing Building height Strategy be reviewed.
Section 13: Non -Specific / Generic Zoning Objectives	Submission in some instances relate to specific rezoning's which cannot be considered at this stage of the plan process. There were a number of submissions made in relation to the 'INST' objective and schools.	It is recommended that the 'INST' zoning objective be reviewed.
Section 14: Miscellaneous	Main issues raised included communication and accessibility during the Pre-Draft Development Plan consultation phase, the legibility, accessibility and formatting of the Development Plan, the legal status of the Plan the role of agriculture and the extractive industries.	It is recommended that the following policies are examined: Policy objectives aimed at creating a progressive and vibrant County that is attractive, inclusive and accessible for everyone in accordance with the recently published DLR Corporate Plan Policy objectives aimed at promoting the development of creative enterprises in the County

2. Draft Core Strategy

2.1 Directions and the Draft Core Strategy

The Planning and Development (Amendment) Act 2010 introduced the requirement for a Core Strategy to be incorporated as part of all County Development Plan's. The purpose of the Core Strategy is to set out an evidence-based strategy for the future spatial development of the Plan area. The central focus of the Core Strategy is on residential development and in ensuring that there is an acceptable equilibrium between the supply of zoned, serviced land for the projected demand for new housing, over the lifetime of the Plan. Section 11(4)(d) of the Planning and Development Act 2000 (as amended) provides that following the consideration of the Chief Executive's Report on submissions for the Pre-Draft consultation stage, that the Members of the Planning Authority may issue Directions to the Chief Executive regarding the preparation of the Draft County Development Plan. **The legislation provides that any such Directions shall be strategic in nature, consistent with the Draft Core Strategy, and shall take account of the statutory obligations of the Local Authority and any relevant policies or objectives for the time being of the Government, or of any Minister of the Government.** In accordance with this statutory requirement, an indicative and 'strategic' level Draft Core Strategy is set out, in order to ensure that 'strategic' Directions issued by Members may be consistent with same.

2.2 Strategic Overview

The National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES), which includes the Metropolitan Area Strategic Plan (MASP), are key determinants for the Core Strategy. The NPF has a clear focus on achieving what is called brownfield/infill development, which translates into encouraging more people, jobs and activity generally within our existing built up areas. In line with this focus on compact growth, it is a target of the NPF that half of future national population growth will be focused in the existing five Cities and their

suburbs, National Planning Objective (NPO) 2a, and furthermore, that at least half of all new homes, that are targeted in the five Cities, will be within their existing built-up footprints. The County Development Plan Core Strategy will focus future development in a manner that delivers the national compact growth agenda.

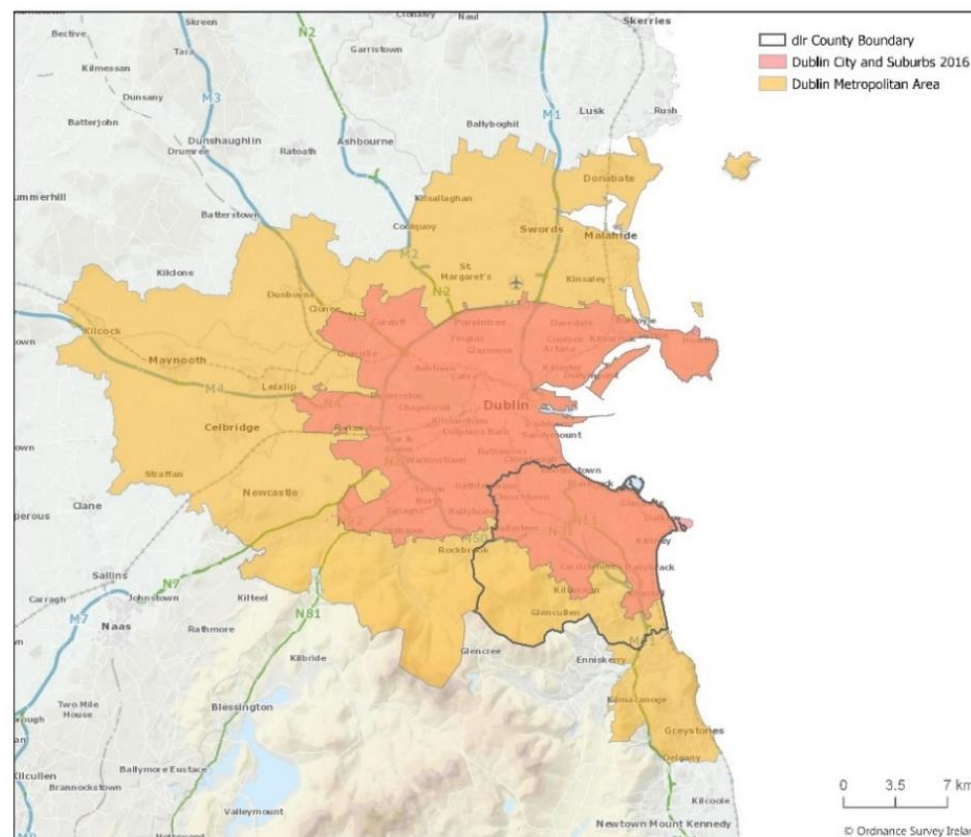
The NPF introduces a new requirement for a two-tier approach to land zoning. Tier 1 lands are serviced, and in general, part of or contiguous to the built-up footprint of an area. Tier 2 lands are not currently sufficiently serviced to support new development but have potential to become fully serviced within the lifetime of the County Development Plan. Tier 2 lands may be positioned within the existing built-up footprint, or contiguous to existing developed lands or to Tier 1 zoned lands. The NPF requires that the County Development Plan must carry out an infrastructural assessment of the required services to support new development on any Tier 2 lands, and the assessment must be aligned with the delivery program of infrastructural providers such as Irish Water and the National Transport Authority. The NPF states that lands that cannot be serviced during the lifetime of the County Development Plan should not be zoned for development. In line with the new requirement for a 'Tiered Approach to Land Zoning', the Draft Core Strategy below provides an indicative zoning tier for each 'new residential community' based on high level knowledge of strategic infrastructure requirements in the County. The allocation of zoning tiers is indicative only and the Draft County Development Plan will include a more detailed assessment of enabling infrastructure requirements.

The RSES sets out a settlement hierarchy for the Region and identifies key growth areas which will see significant development up to 2031 and beyond. (This settlement hierarchy also uses the term tier but differs to the zoning tiers outlined above). Local Authorities are required to determine the County level hierarchy of settlements in accordance with the RSES settlement hierarchy. The Table below sets out the RSES

settlement hierarchy as it applies to DLR. The vast majority of the built-up footprint of DLR falls within ‘Dublin City and Suburbs’, which comprises the first tier in the settlement hierarchy recommended in the RSES. Old Connaught comprises a component part of the future growth of the ‘Key Town’ of Bray (Tier 3), while Glencullen comprises a rural village (Tier 6). As DLR is a small County spatially it does not have the same discrete hierarchy of settlements that can be found in other Counties in Ireland. It is evident that in order for the DLR County Development Plan Core

Strategy to allocate housing and population across settlements in the County, that a more bespoke approach is required. Thus, while the settlement strategy for the Draft County Development Plan will operate within and in accordance with the provisions of the RSES settlement hierarchy, the spatial distribution of housing and population allocation within the hierarchy is refined in order to reflect the specific urban structure of DLR County.

Tier	Settlement Typology	Description	DLR
Tier 1	Dublin City and Suburbs	International business core with a highly concentrated and diversified employment base and higher order retail, arts, culture and leisure offer. Acts as national transport hub with strong inter and intra-regional connections and an extensive commuter catchment	Majority of the urban footprint of DLR
Tier 2	Regional Growth Centres	Regional Growth Centres are large towns with a high level of self-sustaining employment and services that act as regional economic drivers and play a significant role for a wide catchment area.	Not Applicable
Tier 3	Key Towns	Large economically active service and/or county towns that provide employment for their surrounding areas and with high-quality transport links and the capacity to act as growth drivers to complement the Regional Growth Centres.	Bray (Old Conna)
Tier 4 (ii)	Self-Sustaining Growth Towns	i) Self-Sustaining Growth Towns with a moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining.	Not Applicable
Tier 4 (ii)	Self-Sustaining Towns	ii) Self-Sustaining Towns with high levels of population growth and a weak employment base which are reliant on other areas for employment and/or services and which require targeted ‘catch up’ investment to become more self-sustaining.	Not Applicable
Tier 5	Towns and Villages	Towns and villages with local service and employment functions.	Not Applicable
Tier 6	Rural	Villages and the wider rural region.	Glencullen



The Dublin MASP in the RSES sets out, for the first time, a strategic planning and investment framework for the growth of the Dublin Metropolitan area over a 12 to 20-year horizon. The Plan comprises an integrated land use and transportation strategy for the Dublin Metropolitan Area and the entire DLR area falls within the MASP area. The MASP identifies strategic residential and employment corridors based on their current and future development capacity, their ability to deliver outcomes such as compact development, place making, accessibility to public transport, potential for economic development and the ability to deliver a reduced carbon footprint. A phased sequence for the delivery of infrastructure investment is then identified to enable the accelerated delivery of the strategic development corridors within the short term to 2026, the medium term up to 2031 (which is the life span of the RSES) and then onwards to 2040. The strategic development corridors of relevance for DLR are 1) The North-South Corridor and 2) The MetroLink – Luas Corridor. Within the North-South corridor the MASP identifies new residential communities at Woodbrook-Shanganagh and Old Connaught. Within the MetroLink/Luas corridor new residential communities are identified in Ballyogan and Environs and Kiltiernan-Glenamuck while new and emerging mixed-use districts are identified at Cherrywood and Sandyford. It should be noted that mixed use is sometimes more primarily focused on employment as in Sandyford whilst Cherrywood combines a District Centre with employment. The Draft Core Strategy below identifies each of the strategic growth areas identified in the MASP which will be expanded upon to provide additional local level context.

2.3 Population Targets and Land Availability

A key component of the County Development Plan Core Strategy will be an examination of the equilibrium between existing zoned land for residential use (as measured by a 'Residential Development Capacity Audit') and future land requirements (as measured by population forecasts carried out at a regional level). These two datasets will determine the Chief Executive's recommendation in relation to the



quantum of residential land required to be zoned in the Draft Plan. The Planning Authority is currently at an advanced stage of finalising the Residential Development Capacity Audit for the County. In terms of population targets, final adjustments to the NPF and RSES population forecasts at County level are still to be determined, in accordance with the requirements of NPO 68 of the NPF, which allows a reallocation of population to three 'Key Towns', one of which is Bray. It is noted that consultation is currently underway and the Regional Assembly, working with the Local Authorities and the Department of Housing, Planning and

Local Government (DHPLG), is due to provide clarity with regard to adjustments to County population forecasts, which will inform the Core Strategy of the Draft Plan. In the absence of these datasets, the Draft Core Strategy set out below should be considered indicative, being primarily based upon the principles and strategic objectives of the NPF and the RSES with particular focus on the strategic approach to growth set out in the MASP. It is highlighted that the extent to which the Draft Core Strategy below may be incorporated into the Draft County Development Plan is fully dependent on the analysis of inter alia land availability, population forecasts and enabling infrastructure.

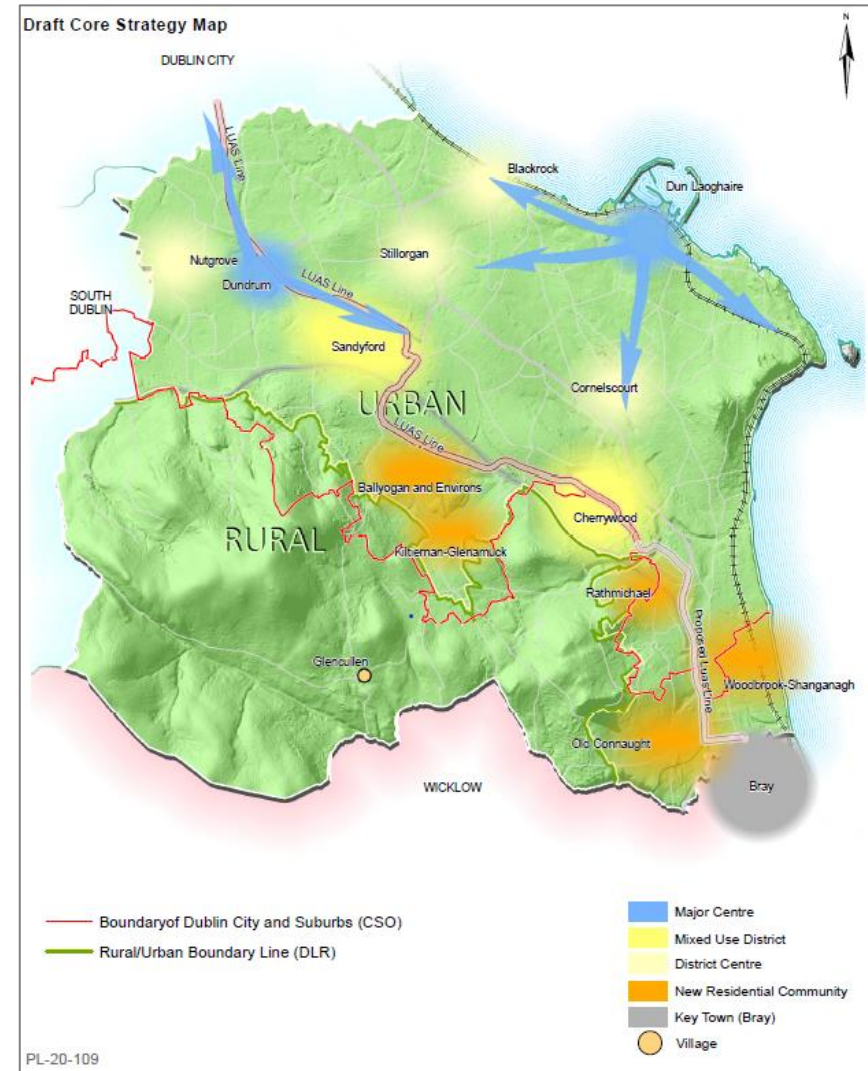
Consolidation and Compact Growth*		
		Possible Zoning Tier
Infill/Windfall/Brownfield		Primarily Tier 1
Strategic Transport Corridor – New Residential Communities		
New Residential Communities	Emerging Mixed-Use District	Zoning Tier
Ballyogan and Environs		Tier 1 and Tier 2
Kiltiernan-Glenamuck		Tier 1 and Tier 2
Old Connaught		Tier 2
Woodbrook-Shanganagh		Tier 1
Rathmichael		Tier 2
	Cherrywood	Delivery to accord with the SDZ Planning Scheme.
	Sandyford	Tier 1 and Tier 2

* This table is at present indicative only as the zoning tier may change based on consultation with infrastructure providers carried out as part of the Draft Plan preparation.

2.4 Draft Core Strategy

The Draft Core Strategy is based upon the key principles of the NPF and the RSES, and further expands upon the strategic development corridor approach of the MASP. The Draft Core Strategy applies both a compact growth agenda to the existing urban footprint of the County and a strategic transport corridor-based approach to growth, that identifies

new residential communities and mixed-use districts in areas based on inter alia accessibility to public transport, development capacity, compact growth objectives, and the ability to deliver a reduced carbon footprint.



Part 2: Summary of Submissions by The Eastern Midlands Regional Authority, The National Transport Authority and the Office of the Planning Regulator and the Executive's Opinion & Recommendations

Key Issue	Sub. No.	Executive's Opinion & Recommendation
2.1 Eastern and Midland Regional Authority (EMRA)		
2.1.1 General		
<p>i) The submission provides a general background to the purpose of the Regional Spatial and Economic Strategy (RSES) and raises the following:</p> <ul style="list-style-type: none"> • Welcomes the comprehensive content of the "Have your Say" document, • Requirement for the County Development Plan to be consistent with the RSES and the National Planning Framework (NPF) thus ensuring alignment between local, regional and national policy. The submission draws attention to key areas and Regional Policy Objectives (RPOs) of the RSES, and the National Strategic Objectives (NSOs) of the NPF which should inform the County Development Plan. 	A0022	<p>The contents of the submission are noted, and Dún-Laoghaire-Rathdown County Council (DLR) welcomes the comments of the Eastern and Midland Regional Authority (EMRA) with regards the 'Have your Say' document. The Council acknowledges the statutory provisions set out under Section 10(2)(A) of the Planning and Development Act 2000 (as amended) that requires the County Development Plan to be consistent with inter alia the National Planning Framework (NPF), Regional Spatial and Economic Strategy (RSES and the Metropolitan Area Strategic Plan (MASP). The higher-tier planning policy framework will inform the preparation of the Draft Plan.</p> <p>With regards to the vision of the Draft Plan, the Planning Authority acknowledges the importance of both the NPF's National Strategic Outcomes (NSOs) and the RSES's Regional Strategic Outcomes (RSOs). It is recognised that both the national NSOs and the regional RSOs are broadly aligned with United Nations Sustainable Development Goals in areas such as climate action, clean energy, sustainable cities and communities, economic growth, reduced inequalities, innovation and infrastructure, as well as education and health. The Council recognises that the principles of sustainability are at the heart of long-term planning and it is recommended that the vision of the Draft Plan reflects same.</p>
2.1.2 Strategic Overview		
<p>i) Submission draws the attention of DLR to Chapter 3 of the RSES which sets out the 'Growth Enablers for the Region' and Chapter 5 which sets out the MASP of the RSES.</p>	A0022	<p>The contents of the submission are noted. The Council acknowledges the 'Growth Enablers for the Region' and also the contents of the MASP, both set out in the RSES. The preparation of the Draft Plan will be informed by same.</p>
<p>ii) Submission draws attention to the guiding principles for infill and brownfield development</p>	A0022	<p>The contents of the submission are noted. The Council recognises the principles of sustainable growth embodied in the NPF and RSES, and the need to secure more compact urban</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
and the creation of a database for strategic brownfield lands.		development patterns with specific targets for the delivery of new homes on infill and brownfield sites within existing urban areas. The Draft Plan will provide the policy framework through which these objectives can be achieved. In addition, it is recommended that the Draft Plan includes an objective for the establishment of a database of strategic brownfield and infill sites to support the implementation of active land management.
iii) Submission seeks the identification of regeneration lands in the Core Strategy.	A0022	The contents of the submission are noted. The Council refers to the requirements of section 10(2)(h) of the Planning and Development Act 2000 (as amended) that requires a Development Plan to include objectives for the development and renewal of areas, identified having regard to the Core Strategy, that need regeneration. The Draft Plan will be prepared in accordance with this statutory requirement, and furthermore, will be informed by the objectives of the RSES with regards to regeneration areas.
iv) Submission requests that the settlement strategy set out in the Draft Plan be in line with the RSES and Regional Policy Objective (RPO) 4.3 which relates to the settlement hierarchy.	A0022	The contents of the submission are noted. The settlement strategy of the Draft Plan will be prepared having due regard to the settlement strategy and settlement hierarchy contained in the RSES.
v) Submission recommends that the Draft Plan clearly defines the location of future development areas in relation to future development areas in the wider Metropolitan area.	A0022	The contents of the submission are noted and will be considered in the preparation of the Draft Plan. It is noted that the Draft Plan will include a Core Strategy Map, the contents of which will be guided by the statutory requirements of Section 10 (2) of the Planning and Development Act 2000 (as amended). (See Part 1, Section 2: Draft Core Strategy).
vi) Submission states that population targets should be applied as set out in the NPF Implementation Roadmap and NPO 68 of the NPF, which allows a reallocation of population to three 'Key Towns', one of which is Bray.	A0022	The contents of the submission are noted. The Council acknowledges that final adjustments to the NPF and RSES population forecasts at County level are still to be determined, in accordance with the requirements of NPO 68 of the NPF. It is noted that consultation is currently underway and the Regional Assembly, working with the Local Authorities and the Department of Housing, Planning and Local Government (DHPLG), is due to provide clarity with regard to adjustments to County population forecasts. The Core Strategy of the Draft Plan will be informed by the agreed population forecasts.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
vii) Submission welcomes recognition of healthy place-making and the importance of the asset-based approach for the strategic location of development.	A0022	The contents of the submission are noted. The NPF and RSES both promote healthy place-making and support the objectives of public health policy. The current Plan includes a suite of policies and guidance aimed at protecting and enhancing the environment, open space provision and encouraging high quality design of both the built environment and public realm. The Draft Plan will continue to support these objectives and include more specific policy objectives in relation to healthy place-making.
2.1.3 Sustainable Travel and Transport		
i) Submission draws attention to RPOs 5.1, 5.2 and 5.3 of the RSES which promote coordination of infrastructure investment in tandem with delivery of transport projects all in order to aid a shift in mobility to more sustainable modes.	A0022	The contents of this submission are noted. The Council acknowledges the importance of these objectives and they will be reflected in numerous policies in the Draft Plan.
ii) Submission welcomes the commitment to integrated transport and land use and sustainable mobility. Reference is made to RPO 8.1.	A0022	The contents of this submission are noted.
iii) Submission references the requirement for the Draft Plan to be consistent with the National Transport Authority's (NTA's) Transport Strategy for the Greater Dublin Area.	A0022	The contents of this submission are noted. The Draft Plan will be consistent with the NTA's Transport Strategy for the Greater Dublin Area.
iv) Submission references the fact that the RSES supports targets set out in the Government's Smarter Travel Policy in relation to modal shift to softer modes of transport which will be facilitated by the delivery of key public transport projects and the Greater Dublin Area Cycle Network.	A0022	The Draft Plan will align with Smarter Travel and the Transport Strategy for the Greater Dublin Area 2016-2035. The Draft Plan will also align with Project Ireland 2040 and the RSES which emphasise active and public transport and healthy placemaking. The delivery of key public transport projects will be supported and the implementation of the Greater Dublin Area Cycle Network Plan, over time, are key objective of the Council.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
2.1.4 Enterprise, Employment and Retail		
i) Submission references MASP guidance in relation to the provision of increased employment densities in the right places (RPO 5.6). It is also recommended that Section 6.3 which sets out the <i>"Guiding Principles to Identify Locations for Strategic Employment Development"</i> , should be utilised in assessing adequacy of the existing employment zoned lands.	A0022	The contents of the submission are noted. The Council acknowledges the contents of RPO 5.6 of the MASP which recommends a sequential approach for the development of future employment lands, with a focus on the re-intensification of employment lands within the M50 and at selected strategic development areas, and provision of appropriate employment densities in tandem with the provision of high-quality public transport corridors. In this context, it is noted that the MASP specifically identifies Cherrywood, Ballyogan and Sandyford as strategic locations for employment generation in DLR. It is recommended that the identification of employment land in the Draft Plan is informed by inter alia RPO 5.6 of the MASP and also the 'Guiding Principles' for the identification of locations for strategic employment development set out in Section 6.3 of the RSES.
ii) Submission references that fact that economic opportunity is one of the three key principles of the RSES, which is linked to place-making and the promotion of strategic locations for new economic development.	A0022	The contents of the submission are noted. The Council recognises the role of the County Development Plan in providing the strategic planning policy framework to support and realise sustainable economic growth that ensures a good living standard for all, underpinning the key principle of 'Economic Opportunity' contained in the RSES.
iii) Submission suggests that Section 6.5 of the RSES which details specific sectors including retail, tourism, marine, low carbon economy and agriculture should be used to develop policy.	A0022	The contents of the submission are noted. The Draft Plan will be informed by the contents of the RSES in addition to an assessment of sectoral growth and employment trends at a County level which will guide future policy direction in this regard.
iv) Submission notes that the Local Economic and Community Plan 2016-2021 (LECP) requires review in light of the adoption of the RSES.	A0022	The contents of the submission are noted. The review of the DLR LECP to be consistent with the RSES is a requirement of the Local Government Reform Act 2014. The Department of Rural and Community Development is currently working on a process to provide guidance to local authorities to support the review process and development of the new LECP.
v) Submission recognises the need for a new Regional Retail Strategy.	A0022	The contents of the submission are noted. The Council welcomes the contents of the RSES whereupon it states that EMRA will support and drive the preparation of a new retail strategy

Key Issue	Sub. No.	Executive's Opinion & Recommendation
		for the Region, to include an update of the retail hierarchy and retail floorspace requirements. The 'Retail Strategy for the Greater Dublin Area 2008-2016' has long been considered out-of-date. The retail strategy of the Draft Plan will continue to be informed by the 'Retail Strategy' but also by the Retail Planning Guidelines for Planning Authorities 2012, the retail hierarchy for the Region as expressed in the RSES, and Section 8.3 of the RSES which set out guiding principles for the location of trip intensive developments such as large-scale retailing.
vi) Submission suggests that RPOs 6.12 – 6.14 of the RSES which support placemaking for town centres will be of relevance in drafting the plan.	A0022	The contents of the submission are noted. It is recommended that the referenced RSES policy objectives relating to town centre renewal be considered in the preparation of the Draft Plan.
2.1.5 Green County		
i) Submission welcomes references to Green Infrastructure and Ecosystems services in line with RPOs 7.21 – 7.22. The submission suggests that the guiding principles for Green Infrastructure as set out in Chapter 7 of the RSES should be incorporated into any plan.	A0022	The contents of the submission are noted. It is recommended that the referenced RSES chapter be considered in the preparation of the Draft Plan.
2.1.6 Environmental Infrastructure and Flooding		
i) The submission suggests that the guiding principles of Sustainable Urban Drainage Systems (SuDS) as set out in chapter 7 of the RSES should be incorporated into any plan.	A0022	The current Plan contains a suite of sustainable measures that is required/promoted for all new developments as part of the Council's SuDS and Water conservation policies. It is recommended that these be updated as part of the review process.
ii) Submission suggest that the information in Chapters 5 and 10 of the RSES will aid in the formulation of the plan.	A0022	It is recommended that both chapters inform the preparation of the Draft Plan.
iii) Submission recommends that the Planning	A0022	RPO 7.433 relates to resilience of critical infrastructure as natural and extreme weather events

Key Issue	Sub. No.	Executive's Opinion & Recommendation
Authority identify risks and ensure resilience of critical infrastructure as set out in RPO 7.43 of the RSES.		become more common place. RPO 7.43 specifically relates to identification of critical infrastructure within their functional areas. DLR plays a critical role in the management of major emergencies and has in place a Major Emergency Plan (2017). Some critical infrastructure within the County is under the remit of other bodies such as Irish Water, Irish Rail and the Electricity Supply Board (ESB). The Major Emergency Plan includes risk assessment and also severe weather plans.
iv) Submission draws attention to integrated marine planning.	A0022	The Draft National Marine Planning Framework along with Section 7.2 Integrated Land and Marine Planning of the RSES will inform the preparation of the Draft Plan.
2.1.7 Archaeological and Architectural Heritage		
i) Submission references the fact that the RSES emphasise that good heritage management should be incorporated into spatial planning so as to promote the benefits of heritage led urban regeneration.	A0022	In general terms, it can be said that the current Plan contains specific policies relating to the protection of Heritage. In addition, it should be noted that it is Council policy to implement the second Dún Laoghaire-Rathdown Heritage Plan 'DLR Heritage Plan 2013 – 2019, Contributing towards Quality of Life'. It is recommended that the Draft Plan will retain this overall policy approach to heritage.
ii) Submission suggest that it should be recognised that heritage plays a key role in tourism.	A0022	The Council recognises that the County's heritage is one of the main attractions for visitors to Ireland and its conservation reinforces and promotes our tourism industry. It is recommended that the Draft Plan include additional specific references to the importance of heritage to tourism in the Dún Laoghaire Rathdown.
2.1.8 Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA)		
i) Submission recommends early engagement with the Office of Public Works (OPW), Department of Culture, Heritage and the Gaeltacht (DCHG), the National Parks and Wildlife (NPWS), the Environmental Protection Agency (EPA) and Irish Water in relation to SEA and AA.	A0022	The Planning Authority have already been in contact with all of these bodies and will continue to engage with them throughout the iterative SEA, AA and Plan process.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
2.2 National Transport Authority (NTA)		
2.2.1 Strategic Overview		
<p>i) Submission by the National Transport Authority (NTA) supports the integration of land use and transport policy and recommends that the following be included in the forthcoming County Development Plan;</p> <ul style="list-style-type: none"> • Urban generated development within or contiguous with existing urban areas should be prioritised over less accessible locations. • Residential developments in urban areas should be carried out sequentially, • Large scale trip intensive developments such as office and retail should be focused into central locations. 	A0149	<p>The contents of this submission are noted. Regarding the sequential approach it is recommended that the Draft Plan comply with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) including the Metropolitan Area Strategic Plan (MASP).</p>
2.2.2 Sustainable Travel and Transport		
<p>i) Submission by the NTA recommends that the following be included in the County Development Plan:</p> <ul style="list-style-type: none"> • High level of permeability should be delivered in town centres for sustainable modes • Sustainable modes should be promoted by maximising the numbers of people living within walking and cycling distance of their neighbourhood and district centres, public transport and other services. • New development should be fully permeable 	A0149	<p>The contents of this submission are noted. The Planning Authority considers that pedestrian and cycle permeability should be considered for new residential developments on a limited basis. Open integrated networks which allow full permeability for all users should be prioritised as per Design Manual for Urban Roads and Streets (DMURS), Government of Ireland, 2019, Section 3.4.1 (page 50-53). It is recommended that policy in the Draft Plan reflect this requirement by requiring compliance with DMURS.</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<p>for walking and cycling and existing areas should be retrofitted as far as is practicable.</p> <ul style="list-style-type: none"> Filtered permeability should be required for new residential developments 		
<p>ii) Submission references the NTAs Implementation Plan 2019-2024 which sets out the range of transport projects to be delivered or commenced. In summary these are:</p> <ul style="list-style-type: none"> Bus connects Luas extension to Bray Luas capacity and network enhancements DART Expansion programme, network development, station and other enhancements Integration measures and sustainable transport investments. 	A0149	<p>The contents of this submission are noted. It is recommended that the Draft Plan support the implementation of the NTAs Implementation Plan 2019-2024 and the range of projects to be delivered which are within the DLR functional area.</p>
2.2.3 Strategic Road Network		
<p>i) Submission states that the NPF sets out the importance of maintaining and improving the TEN-T (Trans-European Transport Network) core strategic network. The strategic transport function of national roads should be maintained and protected in accordance with the Department of the Environment, Community and Local Government (DOECLG) "Spatial Planning and National Roads Guidelines" (2012).</p>	A0149	<p>The contents of this submission are noted. Policy ST26: Motorway and National Routes in the current Plan cover this policy area. It is recommended that this policy be retained and updated with regard to the Ten-T core strategic network in the Draft Plan.</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
2.2.4 Development Management		
i) Submission requests that all non-residential development proposals should be subject to maximum parking standards.	A0149	The contents of this submission are noted. The reason for limiting the supply of car parking spaces (i.e. applying maximum car parking standards) is to limit car-borne commuting and thereby limit its unsustainable carbon and congestion impacts. It is recommended that all employment and education uses have maximum car-parking standards. For other non-residential uses (e.g. large convenience stores, cinemas) the use of maximums would have little impact on traffic and the environment, so parking norms may be applied.
ii) Submission requests that car parking should be capped on an area wide basis in locations where the highest density of development occurs.	A0149	The contents of this submission are noted. It would be difficult to apply area-wide parking standards in practice in Dún Laoghaire-Rathdown. If one applicant gets permission for the last few parking spaces in a particular area, then the next applicant would be denied any parking, which may be unfair and/or inappropriate, especially if the first developer does not proceed with his development. The Planning Authority considers that it is best to have appropriate standards and apply them to all developments in an area.
iii) Submission request that cycle parking should be appropriately designed into the public realm and specific policies should be included in terms of both the public realm and private developments. The NTA supports the Councils cycle parking standards.	A0149	The Planning Authority welcomes the comments that the NTA support the Council's cycling standards.
iv) Submission request that for all major employment developments and schools travel plans should be conditioned as part of planning conditions consistent with NTA Guidance.	A0149	The contents of this submission are noted. It is recommended that Policy ST20 on Travel Plans be retained in the Draft Plan. Section 8.2.4.3 sets out the thresholds for Travel Plans, which are required for all employment developments over 100 persons and school. This requirement will be retained.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
2.3 Office of the Planning Regulator (OPR)		
2.3.1 Strategic Overview		
i) Submission highlights that the NPF and the RSES are key determinants for the Core Strategy.	A0130	The contents of the submission are noted. The Council acknowledges the requirements of Section 10(2)(A) of the Planning and Development Act 2000 (as amended) that requires the Development Plan to be consistent with inter alia the NPF, RSES and the MASP.
ii) Submission highlights that County population projections set out in Appendix B of the RSES are a key element for the formulation of the Core Strategy. Reference is made to NPO 68 of the NPF and Section 5.7 of the RSES that allows for adjustment to the population forecasts.	A0130	The contents of the submission are noted. The Council acknowledges that final adjustments to the NPF and RSES population forecasts at County level are still to be determined in accordance with the requirements of NPO 68 of the NPF. The Core Strategy of the Draft Plan will be informed by the agreed population forecasts.
iii) Submission notes that there are approx. 1,800 residential units under construction in DLR with a further 9,890 units that have the benefit of planning permission. It is noted that this quantum combined would have the potential to increase the County's population by c. 30,000 people and beyond the high population projection figure in Appendix B of the RSES.	A0130	The contents of the submission are noted. The Council acknowledges the significant quantum of extant planning permissions for residential development in the County and considers that assessing the inter-relationship and variance between planning activity and construction activity will be of central importance in the preparation of an informed Core Strategy. It is further noted, as set out above, that the final County level population projections are still to be agreed and finalised.
iv) Submission notes the relationship of the County's built up area with Bray and Environs and recommends that engagement and co-ordination with Wicklow County Council take place.	A0130	The Council has, to date, actively engaged with each of the three Planning Authorities that adjoin the County's administrative boundary. It is acknowledged that particular focus will be required with regard to the co-ordination of objectives with Wicklow County Council and the future growth of the Key Town of Bray, which incorporates lands at Old Connaught.
v) Submission notes that residential construction activity in the County is largely concentrated in four main areas while other areas have stagnated	A0130	The contents of the submission with regard to the 'O/O Zone' are acknowledged and this will be considered during the preparation of the Draft Plan. (See also section 13).

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<p>or suffered population decline. In this regard it is submitted that the Council should reconsider the 'O/O Zone' especially in locations close to public transport where government policy supports higher densities.</p>		
<p>vi) Submission highlights the need to undertake a Housing Need and Demand Assessment (HNDA) which will need to respond to socio-economic trends and be consistent with NPO 37 of the NPF.</p>	<p>A0130</p>	<p>The Council acknowledges the provisions of NPO 37 in the NPF and the requirement for each Local Authority area to prepare a HNDA. While the Council welcomes the introduction of the HNDA as a key mechanism for understanding current and future housing market needs it is highlighted that, at present, no formal Departmental guidance has been made available in respect of carrying out a HNDA.</p> <p>NPO 37 of the NPF refers to the establishment of a coordination and monitoring unit to assist Local Authorities and Regional Assemblies in the development of the HNDA and that this will involve developing a centralised spatial database for housing data that supports the HNDA being undertaken by Local Authorities. To date no such unit has been established.</p> <p>Furthermore, the RSES states that having regard to the significant influence that Dublin plays in relation to the housing and settlement patterns and demands within the Region, that a Regional HNDA would be appropriate for the four Dublin Local Authorities</p> <p>In the absence of the publication of any guidance documents and supporting material regarding the preparation of a HNDA it is not considered feasible nor practicable at this juncture to prepare a HNDA solely for the DLR area. Notwithstanding, the Local Authority will endeavour to implement the provisions of any forthcoming guidance on the matter should it be feasible within the statutory timeframe associated with the making of the County Development Plan. In the interim period it is considered that the Housing Strategy will continue to inform housing policy in the County.</p>
<p>vii) Submission references the phasing/enabling infrastructure contained in Table 5.1 of the RSES</p>	<p>A0130</p>	<p>The contents of the submission are noted. The Council are engaging with key stakeholders including adjoining Local Authorities and infrastructure providers on an on-going basis in the</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
required to support the development of strategic areas identified in the MASP. It is submitted that there is a need for coordination with Wicklow County Council, the NTA, Transport Infrastructure Ireland and Irish Water to ensure appropriate phasing and early delivery of infrastructure.		preparation of the Draft Plan. Engagement with the key infrastructure providers will inform the preparation of the Core Strategy and specifically the requirement to incorporate a tiered approach to zoning, as set out in Appendix 3 of the NPF. It is intended that the Draft Plan will include an infrastructural assessment that considers the phasing and delivery of enabling infrastructure to support the strategic development of identified growth areas.
2.3.2 Climate Action		
i) Submission considers the transition to a low carbon economy and reduction in carbon emissions to be a central issue for planning policies in the preparation of the Draft Plan and commends the Council for the strong emphasis in the Issues Paper in this regard.	A0130	The contents of the submission are noted and welcomed.
ii) Submission advises that forthcoming updates to the Section 28 'Development Plan Guidelines' will contain guidance on the requirement under Section 10(2)(n) of the Act to promote sustainable settlement and transportation strategies including measures to reduce energy demand and greenhouse gas emissions by virtue of the location, layout and design of new development.	A0130	The contents of the submission are noted. The Local Authority will endeavour to implement the provisions of any forthcoming guidance should it be feasible to incorporate same in accordance with the statutory timeframe associated with the making of the County Development Plan. Notwithstanding the absence of said guidance, the Council is committed to playing its role in transitioning to a climate resilient low carbon County and it is envisaged that the forthcoming Draft Plan will address climate action through a myriad of cross-thematic policies.
iii) Submission references the Dún Laoghaire-Rathdown Baseline Emissions Report and notes that it will provide an important data source to inform local policies and targets in the next development plan.	A0130	The contents of the submission are noted. The current Dún Laoghaire-Rathdown Baseline Emissions Report 2016 is in the process of being updated and will inform the preparation of the Draft Plan.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
iv) Submission notes that the promotion of renewable energy within the County in accordance with the Section 28 <i>'Wind Energy Development Guidelines'</i> (2006) and <i>'Draft Wind Energy Development Guidelines'</i> (2019) will be critical to ensure Ireland meets its national targets and commitments for increasing renewable energy supply and reducing greenhouse gas emissions.	A0130	Appendix 6 of the current Development Plan consists of a 'Wind Energy Strategy' for Dún Laoghaire Rathdown. This Strategy, which was prepared in accordance with the Section 28 'Wind Energy Development Guidelines', includes an analysis of wind speeds and the sensitive landscapes of the County at a broad level, and their relationship to the existing electricity grid network was undertaken. It was concluded that there was no realistic or practical potential for economic on-shore wind farm development in the County without significant and overriding adverse visual and environmental impacts. For the purposes of the Draft Plan, this earlier analysis will be further updated to take cognisance of recent changes to Government guidance on Wind Energy.
2.3.3 People, Home & Place		
i) Submission notes that updated guidance on rural housing is being prepared by the Department of Housing, Planning and Local Government (DHPLG). Submission advises that, in its absence, the Council should refer to NPO 19 of the NPF and Circular PL 2/2017.	A0130	The contents of the submission are noted. It is recommended that policies in the Draft Plan regarding rural housing will be prepared having regard to the most up-to-date and available guidance including NPO 19 of the NPF and Circular Letter PL 2/2017 (excluding Section 3.2.3).
2.3.4 Sustainable Travel and Transport		
i) Submission acknowledges the importance of an integrated approach to land use and transportation and commends the Council for its initiatives to encourage more compact growth and sustainable travel.	A0130	The contents of the submission are noted.
ii) Submission notes that the 'Guiding Principles for Integration of Land Use and Transport' under the RSES (RPO 8.1 and 8.4) should inform the Draft Plan.	A0130	The contents of the submission are noted. The preparation of the Draft Plan will be informed by the 'Guiding Principles' for the integration of land use and transport set out in the RSES, in addition to the NTA's Transport Strategy for the Greater Dublin Area. Policy ST2 in the current Plan relating to 'Integration of Land Use and Transportation Policies' will be

Key Issue	Sub. No.	Executive's Opinion & Recommendation
		reviewed as part of the preparation of the Draft Plan.
iii) Submission notes that the National Development Plan and the NTA's Strategy contain several major transport projects that will serve future greenfield and brownfield development in the County. A key issue for the County Development Plan is to ensure that policies maximise the benefits of existing and planned public transport investment while planned improvements to the national road network are not eroded by a growth in demand for car travel. Specific reference is made to the proposed upgrading of the M50 and N11/M11.	A0130	The contents of the submission are noted. The Draft Plan will align with Smarter Travel and the Transport Strategy for the Greater Dublin Area 2016-2035. The Plan will also align with Project Ireland 2040 and the RSES which emphasise active and public transport and healthy placemaking. The delivery of key public transport projects and the improvements to the National road network will be supported. Existing policies ST11: Public Transport Improvements and ST26: Motorways and National Roads will be updated to reflect the issues raised.
iv) Submission notes the recommendations for DLR contained in the ' <i>Bray and Environs Transport Study</i> ' (2019) including the need for the County Development Plan to fully reflect the study.	A0130	The contents of the submission are noted. The Draft Plan will reflect this study.
2.3.5 Enterprise and Employment		
i) Submission highlights Table 5.2 of the RSES that identifies strategic employment locations on the Metrolink / Luas Greenline strategic corridor. It is submitted that policies regarding economic development and employment in the County Development Plan should be informed by the guiding principles set out in Section 6.3 of the RSES.	A0130	The contents of the submission are noted. It is acknowledged that Cherrywood, Ballyogan and Sandyford are identified in the MASP as " <i>Strategic Employment Locations</i> " on the Metrolink / Luas Green line Corridor and as such the 'Employment Strategy' of the current Plan will be reviewed in light of same. It is recommended that the preparation of the Draft Plan will be informed by the 'Guiding Principles' for the identification of locations for strategic employment development as set out in the RSES.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
2.3.6 Retail		
i) Submission notes the differing roles that the Level 2 Major Town Centres and Level 3 Town/District Centres play and acknowledges the trends, redevelopment proposals and challenges/opportunities affecting the individual centres.	A0130	The contents of the submission are noted. It is considered that the well-established retail hierarchy in the County is operating reasonably satisfactorily and its overall logic is well understood by the general public, retailers and developers alike. It is recommended that Draft Plan will continue to support the future vitality and viability of the main retail centres in the County and to facilitate a competitive and healthy environment for the retail industry of the future, while reinforcing sustainable development.
2.3.7 Principles of Development		
i) Submission notes that the standards and requirements for apartment development set out in Section 8 of the current County Development Plan have been superseded by the Section 28 Guidelines 'Sustainable Urban Housing: Design Standards for New Apartments' (DoEHLG, 2018).	A0130	The contents of the submission are noted. As part of the review process the standards and requirements for apartment developments set out in Section 8 of the current Plan will be reviewed to ensure that they are consistent to the Section 28 Guidelines 'Sustainable Urban Housing: Design Standards for New Apartments' (2018).
2.3.8 Appendices – Building Height Strategy		
i) Submission requests that the building height strategy in the forthcoming County Development Plan shall be cognisant of the Section 28 Guidelines 'Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities' (2018) and, in particular, Specific Planning Policy Requirement (SPPR) 1.	A0130	The contents of the submission are noted. As part of the review process the existing Building Height Strategy will be reviewed to ensure that it is consistent with national and regional objectives set out in the NPF and RSES, has regard to 'Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities' (2018) and is consistent with the 4 SPPR's contained within.

Part 3: Summary of Submissions & the Executive's Opinion & Recommendations

Section 1: Strategic Overview

Key Issue	Sub. No.	Executive's Opinion & Recommendation
1.1 Strategic Vision		
i) Submission recommends that planning should operate in partnership with United Nations (UN) Sustainable Development Goals.	A0100	The contents of the submission are noted and agreed. The Local Authority recognises that the principles of sustainability are at the heart of long-term planning. There is broad alignment between the National Strategic Outcomes (NSOs) of the National Planning Framework (NPF), to which the County Development Plan must be consistent, and the Sustainable Development Goals of the United Nations, in areas such as climate action, clean energy, sustainable cities and communities, economic growth, reduced inequalities, innovation and infrastructure, as well as education and health. It is recommended that reference to same be included in the Draft Plan.
ii) Various submissions make recommendations in relation to the overall vision of the County Development Plan: <ul style="list-style-type: none"> • Priority given to sustainable development. • Focus on compact growth. • Need to provide infrastructure and more public transport options. • Priority for green space and biodiversity. • Less focus on economic growth and more on health, wellbeing and income equality. • Set the standard for policy that effectively accommodates the climate crisis. • Local infrastructure and the local economy are key to a sustainable future. • The County should comprise a linked network of environmentally and economically sustainable communities. • Provision of housing should not be at the expense of the natural environment or of 	A0012 A0013 A0023 A0055 A0056 A0072 A0080 A0100 A0102 A0129 A0132 A0145 A0151	The contents of the submissions are noted. The Council would agree with many of the sentiments expressed. The County Development Plan aims to contain a robust vision with policies and objectives that achieve a balance between the need for growth for both existing and new communities and the protection of all the amenities that make DLR a great County in which to live and work. The Council would agree that provision of infrastructure and a thriving local economy are key components to sustainable development. It is recommended that the Draft Plan includes references to wellbeing and health, in addition, economic growth is also a key component of the proper planning and sustainable growth of the County. It is recommended that climate action be a key overarching theme of the Draft Plan.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<p>existing communities.</p> <ul style="list-style-type: none"> Consistency with the Regional Spatial and Economic Strategy (RSES) and National Planning Framework (NPF). Requests that 'urban' and 'suburban' areas are clearly defined and spatially indicated in the Plan. 		
<p>iii) Submission suggests that the University College Dublin (UCD) Students' Strategic Vision could make a positive contribution to the content and objectives of the County Development Plan, and that the County Development Plan could in turn support and facilitate the UCD Student's Strategic Vision.</p>	<p>A0083</p>	<p>The submission of the UCD Students Strategic Vision is welcomed. The contents of the Strategic Vision are noted and will be considered during the preparation of the Draft Plan.</p>
<p>1.2 Core Strategy</p>		
<p>1.2.1 Population and Housing Targets</p>		
<p>i) Submission refers to the housing crisis and the need to provide additional residential units. Suggests there is a need to identify additional serviced land in close proximity to public transport corridors for residential development.</p>	<p>A0040</p>	<p>The contents of the submission are noted. A key component of the County Development Plan will be the Core Strategy which will examine the equilibrium between existing zoned land for residential use (as measured by a 'Residential Development Capacity Audit') and future land requirements (as measured by population forecasts carried out at a regional level). These two datasets will determine the Chief Executive's recommendation in relation to the quantum of residential land required to be zoned in the Draft Plan.</p>
<p>ii) Submissions raise a number of issues in relation to population and housing targets:</p> <ul style="list-style-type: none"> Population estimates in the NPF and RSES underestimate population growth. The County 	<p>A0095 A0112 A0122 A0124</p>	<p>The contents of the submissions are noted and will be considered in the preparation of the Draft Plan and Housing Strategy. While the preparation of the Core Strategy of the Draft Plan will be informed by an analysis of housing and demographic trends, it is highlighted that the Draft Plan is required to maintain consistency with the County level population targets set out</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<p>Development Plan needs to reflect the up-to-date position and consult with the Eastern and Midlands Regional Assembly (EMRA) and Department of Housing, Planning and Local Government (DHPLG).</p> <ul style="list-style-type: none"> • There is significant pent-up demand for housing as a result of high levels of population growth and low housing completion levels. A position of equilibrium should not be the starting point for calculating housing targets. • The Central Bank of Ireland publication <i>"Population Change and Housing Demand in Ireland"</i> (2019) states that 34,000 dwellings are needed per annum up to 2030. 	A0128	<p>in the RSES. The population targets contained within the RSES are borne from the NPF which is unapologetic in seeking to disrupt long established growth trends which have seen the greatest growth taking place in the Eastern and Midlands Region. The NPF seeks to move away from the 'business as usual' pattern of development and this is implemented through the allocation of population targets at County/City level.</p>
1.2.2 Household Size		
<p>i) Submissions raise points in relation to household size including inter alia:</p> <ul style="list-style-type: none"> • The current average household size of 2.7 is artificially high. • Housing targets should be based on lower occupancy rates for apartments. Policy emphasis on compact urban form and higher density will result in a higher number of apartments compared to houses. • Lower occupancy rates should be applied for Cherrywood, Dundrum and Dún Laoghaire. 	A0112 A0122 A0124 A0128	<p>The contents of the submissions are noted. It is acknowledged that, despite the comparatively high average household size of 2.72 recorded in DLR in Census 2016, that the European and national long-term trend in household size is declining. The former regional planning policy framework, the 'Regional Planning Guidelines for the Greater Dublin Area 2010-2022', provided both population and housing targets to be applied at County level as part of the County Development Plan plan-making process. In contrast, the current regional policy framework, the RSES, provides only population targets, and as such, the Planning Authority is required to calculate housing targets based upon regional population growth targets. It is acknowledged that future household size comprises an important factor in the calculation of the overall housing target for the Core Strategy and as such analysis of same will comprise a key determinant in preparation of the Draft Plan. Housing targets provided in the Core Strategy will be supported by a justified household size.</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
1.2.3 Housing Targets		
i) Submission refers to Housing Taskforce data that suggests the average conversion rate for permitted residential units is c. 25%. It is submitted that three times as many units would need to be permitted to deliver the housing target and provision of zoned land must allow for this.	A0115	The contents of the submission are noted. In devising the Core Strategy for the Draft Plan, a range of inter-related factors will be examined including both the quantum of residential development that has the benefit of planning permission and also housing completion levels. It is recognised that assessing the inter-relationship between planning activity and construction activity will be of central importance in the preparation of an informed and realistic Core Strategy.
ii) Submission notes that the zoning of land and granting of permission does not guarantee the delivery of housing. Submission supports active land management measures in order to increase supply in a sustainable manner.	A0122	The contents of the submission are noted and agreed. The Planning Authority supports the use of active land management measures, as appropriate, to encourage the delivery of housing, and recognises the important role of active land management in the implementation of the County Development Plan policies and objectives.
iii) Submission suggests that the housing capacity study should not include all granted planning permissions as housing completion levels remain low. It is submitted that a clear evidence base is needed in the housing supply and demand assessment.	A0144	The contents of the submission are noted. The role of extant planning permissions for residential development will be fully considered in the preparation of the Draft Plan. The inter-relationship between planning activity and construction activity is considered to be of central importance in the preparation of an informed and realistic Core Strategy. Furthermore, it is noted that the Draft Plan will address other matters raised including population growth, household size, an ageing population and housing mix.
1.2.4 Housing Need and Demand Assessment		
i) Submission notes that the Section 28 Guidelines on Housing Need and Demand Assessment (HNDA) have not yet been published but submits that this does not prevent the Council from considering these issues in calculating housing unit figures.	A0124	The contents of the submission are noted. It is considered that, until Section 28 guidance regarding the preparation of a HNDA is made available, that it would not be feasible or appropriate to prepare a HNDA for the County. Furthermore, the RSES states that in the case of Dublin a regional HNDA is appropriate. There is likely significant overlap between the key data-sets and inputs which inform the preparation of the HNDA, the Core Strategy and the Housing Strategy of the County Development Plan.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
1.2.5 Monitoring		
i) Submission requests that the Planning Authority recognise that population targets in the RSES will require continual monitoring and review to ensure the sufficient availability of zoned and serviced land over the lifetime of the County Development Plan.	A0144	The contents of the submission are noted. At a County level it is anticipated that the Draft Plan will provide an increased focus in terms of monitored outcomes measured against County Development Plan objectives, which will be subject to ongoing review. Furthermore, at a regional and national level, it is noted that the legislative provisions set out that the NPF and RSES will be subject to regular cycles of review.
1.3 Settlement Strategy		
i) Submission suggests the Planning Authority considers, within the Core Strategy, the following: <ul style="list-style-type: none"> • Sufficient land for: community/neighbourhood use; employment use; and, recreational use. • Protection of landscape and conservation of architectural/built heritage and archaeology. • Access by Smarter Travel/mobility. • Irelands Climate Change Plan 2019. 	A0040	The contents of the submission are noted and will be considered in the preparation of the Core Strategy, and elsewhere through specific policies and objectives in the Draft Plan.
ii) Submissions state that there should be: <ul style="list-style-type: none"> • More emphasis on compact growth. • Increasing residential density. • Consolidation of residential and commercial development along public transport corridors such as the DART and Luas. • Re-zoning of underutilised land for residential development e.g. surface level car parks. • Core Strategy Map should take account of the extent of the Dublin Metropolitan Area. 	A0046 A0128 A0129	The contents of the submission are noted and broadly agreed. The contents of the submission are generally in line with national and regional strategic objectives for compact growth, consolidation of the existing built-up area, the integration of transportation and land use, and the regeneration and/or redevelopment of infill/brownfield sites. These principles are broadly reflected in the current Plan and it is anticipated that the Draft Plan will further develop upon the existing policy framework through which these objectives can be achieved.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
iii) Submissions raise concerns in relation to the number of applications in the Stepside area, the preponderance of one and two-bedroom, traffic congestion and the shortage of local amenities. One submission considers funding is required to improve the infrastructure and amenities.	A0068 A0082	The contents of the submission are noted. The recently adopted Ballyogan and Environs Local Area Plan (LAP) provides a comprehensive plan-led development vision for the area and addresses many of the issues raised in this submission.
iv) Submissions welcome greater efficiency in land management and support the application of national and regional policies for compact growth and the avoidance of urban sprawl. Measures recommended include inter alia: reductions in vacancy; re-use of existing buildings; brownfield and infill development; and, regeneration.	A0105 A0124 A0112	The contents of the submission are noted. The Council recognises the principles of sustainable growth embodied in the NPF and RSES, and the need to secure more compact urban development patterns with specific targets for the delivery of new homes on infill and brownfield sites within existing urban areas. The Draft Plan will provide the policy framework through which these objectives can be achieved and will incorporate a range of measures including inter alia a compact growth strategy, active land management measures and robust planning policies.
v) Submission opposes the development of unsuitable infill sites throughout the County. It is submitted that many of the infill sites are not in keeping with the existing environment.	A0146	The contents of the submission are noted and will be considered in the preparation of the Draft Plan. The current Plan comprises zoning objectives combined with robust planning policies through which proposed residential schemes may be assessed.
vi) Submission suggests that the County Development Plan should clearly set out areas that are suitable for redevelopment at higher densities, and conversely those areas that are not.	A0102	The contents of the submission are noted. The current Plan comprises zoning objectives combined with robust planning policies through which proposed residential schemes may be assessed. Furthermore, the primary growth areas in the County are, in the main, subject to detailed LAPs or Urban Framework Plans that provide a more granular level of detail in terms of sustainable development. It is considered that the request to differentiate all areas as either suitable for redevelopment, or not, is unnecessary in the context of the existing policy framework.
vii) Submission recommends that higher residential development should be focused on the public transport corridors identified in the Metropolitan	A0102	The contents of the submission are noted and will be considered in the preparation of the Draft Plan. With particular reference to the MASP, the Planning Authority acknowledges that the policies in the Draft Plan will need to provide the strategic direction to ensure the

Key Issue	Sub. No.	Executive's Opinion & Recommendation
Area Strategic Plan (MASP) and in designated Major Centres, Secondary Centres and Future Development Areas.		objectives of the MASP are achieved.
viii) Submissions relate to the supply and demand of land and request that the Draft Plan ensures a balance between the demand for new residential land and the supply of serviced land.	A0113 A0128	The contents of the submission are noted. A key component of the Draft Plan will be the Core Strategy which will examine the equilibrium between existing zoned residential land and future land requirements. In terms of infrastructure requirements, zoned land will be tiered to differentiate between i) zoned land that is serviced (Tier 1 lands) and ii) zoned land that is serviceable within the life of the Plan (Tier 2 lands).
ix) Submission recommends that the 'Housing Land Availability Study' looks at the opportunities of brownfield sites.	A0129	The contents of the submission are noted. A key component of the Core Strategy will be the preparation of a 'Residential Development Capacity Audit' which will assess existing zoned land for residential use.
x) Submission highlights the importance of co-ordination between bordering Local Authorities to ensure effective planning.	A0129	The contents of the submission are noted and agreed. The Planning Authority are engaging with each of the three Planning Authorities that adjoin the County's administrative boundary, and will continue to do so, during the plan-making process.
xi) Submission expresses the wish to get people back living in Dundrum Village. Submission stresses the need to ensure sufficient affordable, high quality and sustainable housing in Dundrum.	A0136	The contents of the submission are noted and will be considered in the preparation of the Draft Plan. The future growth of Dundrum will be considered in the preparation of the Draft Plan in addition to the existing objective to prepare a LAP.
xii) Submission supports the continued development of brownfield and greenfield sites such as Cherrywood and the Old Dún Laoghaire Golf Club.	A0146	The contents of the submission are noted.
xiii) Submission states that the basis for the calculation of units allocated at Cherrywood is out of date and suggests increasing the 8,800 units planned for.	A0124	The contents of the submission are noted. The Strategic Development Zone (SDZ) process and the adopted SDZ Planning Scheme are stand-alone from the County Development Plan process and will not be altered through the County Development Plan (CDP) making process.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
xiv) Submissions support a strategy for the rural side of the County that includes: <ul style="list-style-type: none"> • Promoting settlement nucleation and protecting rural areas from car dependent, dispersed, urban-generated settlement. • Assessment through Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA). 	A0065 A0140	The contents of the submissions are noted. The current Plan advocates a robust rural settlement strategy which will be reviewed during the preparation of the Draft Plan. The County Development Plan will be subject to both AA and SEA.
xv) Submission asserts the County Development Plan must comprise an evidence-based approach to land-use zoning and settlement planning, as set out in the Planning and Development Act 2010.	A0065	The contents of the submission are noted. The Planning Authority acknowledges that the Core Strategy in the Draft Plan must provide a transparent evidence-based rationale for the amount of land proposed to be zoned for residential and allied mixed-use zonings.
xvi) Submission supports small-scale local industrial/commercial zones proximate to existing or proposed residential areas to deliver local employment opportunities rather than promoting large-scale industrial/warehouse parks.	A0065	The contents of the submission are noted and will be considered in the preparation of the Draft Plan. The Draft Plan will be informed by an analysis of the existing employment / enterprise landbank and future requirements having regard to inter alia population growth forecasts, the MASP and the 'Guiding Principles to Identify Locations for Strategic Employment Development' set out in the RSES.
xvii) Submission describes a vision for strategic development which would entail Dalkey playing a more prominent role.	A0092	The contents of the submission are noted and will be considered in the preparation of the Draft Plan.
xviii) Submission considers that Kiltiernan, Cherrywood and Old Connaught should be prioritised for high density development due to their strong infrastructure connections including public transport.	A0129	The contents of the submission are noted. Cherrywood is considered to be of strategic importance for the future growth of the County. It is noted that the adopted SDZ Planning Scheme is a stand-alone planning document from the County Development Plan and will thus not be amended by the Draft Plan. With regards to Kiltiernan-Glenamuck and Old Connaught, both of these areas are identified in the RSES for future growth.
xix) Submission acknowledges that residential	A0049	The contents of the submission are noted and will be considered in the preparation of the

Key Issue	Sub. No.	Executive's Opinion & Recommendation
development in the Old Connaught area will impact the character of the area, however, the submission requests that local identity is retained through sympathetic development.		Draft Plan. In the Old Connaught LAP area, the overall strategy direction will be very much focussed on the need to ensure a balance between the protection of the built, archaeological and natural heritage with the legitimate expectation that DLR, as a 'living and breathing' County will continue to develop and evolve in a positive, considered and sustainable manner. Policy guidance and objectives will be incorporated into the Draft LAP to ensure (i) an appropriate degree of protection is afforded to the area's historic built and natural environment, and (ii) how best new development can be integrated into the Plan area.
xx) Submissions make the case for the retention of Old Connaught as a future growth area. One submission recommends that their submission made at Pre-Draft stage on the Old Connaught LAP should be considered. It is submitted that the lands are suitable for high density development.	A0088 A0120	The contents of the submissions are noted and will be considered in the preparation of the Draft Plan. The Planning Authority acknowledges the identification of Old Connaught in the RSES for future growth as part of the westward expansion of the Key Town of Bray.
xxi) Submission requests that the current Core Strategy which identifies Kiltiernan as a future development area should be clarified as the Glenamuck - Kiltiernan development area. It is submitted that there is potential in the Glenamuck - Kiltiernan area for further sustainable compact urban development.	A0095	The contents of the submission are noted and will be considered in the preparation of the Draft Plan. The Planning Authority acknowledges that Kiltiernan - Glenamuck has been identified in the MASP of the RSES as a "new residential community" and it is recommended that the Draft Plan use the correct geographical title – Kiltiernan - Glenamuck. In relation to the zoning of residential land, the Core Strategy will examine the equilibrium between existing zoned residential land and future land requirements. These two datasets will determine the Chief Executive's recommendation in relation to zoning requirements.
xxii) Submissions request that the Council supports the appropriate regeneration of vacant and/or derelict sites within Dalkey and Dún Laoghaire.	A0092 A0119 A0147	The contents of the submissions are noted. Building on sites within the existing built-up area including redeveloping existing underutilised and vacant/derelict sites supports the efficient creation of a sustainable and compact County. In this regard, the Council recognises the need to promote active land management and the better use of under-utilised and brownfield sites.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
1.4 Enabling Infrastructure		
i) Submission requests that County Development Plan policies align with other bodies such as the National Transport Authority (NTA) (Bus Connects) and Irish Water in terms of infrastructure provision.	A0036	The contents of the submission are noted. The Planning Authority maintains a close working relationship with both Irish Water and the NTA, on an ongoing basis, in order to achieve common objectives such as ensuring that growth is planned in tandem with the requisite service infrastructure. This will be reflected in the Draft Plan.
ii) Submissions state that enabling infrastructure such as roads, water and foul drainage, public transportation and amenities should be in place prior to new residential development.	A0049 A0075 A0129	The contents of these submissions are noted. Engagement with key infrastructure providers will inform the preparation of the Draft Plan and specifically the requirement to incorporate a tiered approach to zoning, as set out in Appendix 3 of the NPF. It is intended that the Draft Plan will include an infrastructural assessment that considers the phasing and delivery of enabling infrastructure to support the strategic development of identified growth areas.
iii) Submission notes that objectives to ensure an appropriate quantum and type of community infrastructure is in place before development can be permitted is not always achievable.	A0124	The contents of the submission are noted and will be considered in the preparation of the Draft Plan.
1.5 Local Area Plans		
i) Submissions support the preparation of a LAP / local community plan for the UCD and Clonskeagh area.	A0023 A0083	The contents of these submissions are noted. The publication, 'Local Area Plans - Guidelines for Planning Authorities' (2013) states that " <i>Local Area Plans provide more detailed planning policies for areas where significant development and change is anticipated</i> ". In relation to decision making on whether to prepare a LAP for a sub-threshold area, the Guidelines state that the criteria influencing any such decision should include, " <i>...the degree to which major development is anticipated such as to justify the preparation of a standalone local area plan, the resource implications and the need to focus resources for areas where major alterations to the built environment are anticipated.</i> " During the County Development Plan review process, the requirement for any new LAPs will be considered having regard to the above criteria.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<p>ii) Submission notes that much of the Blackrock LAP remains unimplemented and should be a key strategic priority for the Draft Plan. Blackrock Village faces many challenges and delivering on the objectives set out in the LAP would address issues including inter alia connectivity, accessibility, identity, legibility, and the overall public realm.</p>	<p>A0084</p>	<p>The contents of the submission are noted. It is acknowledged that while the vision of the LAP has partially been progressed there remains a broader range of policies and objectives in relation to urban design, movement and accessibility, amenities and residential which have yet to be met. In this context, the life of the Blackrock LAP was recently extended in February 2020 for a further five-year period to 2025, during which time these objectives may be realised.</p>
<p>iii) Submission suggests that a LAP should be prepared for Dún Laoghaire Town. It is submitted that Dún Laoghaire is suitable for higher densities in accordance with the principle of compact growth as set out in the NPF and the RSES.</p>	<p>A0133</p>	<p>The contents of the submission are noted. The current Plan includes the detailed Dún Laoghaire Urban Framework Plan (DLUFP) which sets out a clear and coherent vision to guide development in the Town. The DLUFP encompasses that area from Sandycove to the Gut and takes in the retail and commercial core of the town. The DLUFP is underpinned by three themes, connecting the Town centre to the waterfront, creating vitality and strengthening links with adjoining areas. Considerable progress has been made in realising the objectives of the Plan, with the completion of the Metals Project, provision of housing at Georges Place, the upgrading of Haigh Terrace and the Baths Project nearing completion. The current Plan also includes an objective to prepare a LAP for the Dún Laoghaire and Environs Area and it is recommended that this objective be retained in the Draft Plan. The Council will review the DLUFP when preparing the Draft Plan.</p>

Section 2: Climate Action

Key Issue	Sub. No.	Executive's Opinion & Recommendation
2.1 Strategic/general Climate Action issues		
i) Submission questions whether climate change is real.	A0007	The United Nations (UN), European Union (EU) and the Irish Government, the Eastern Midlands Regional Authority (EMRA) and DLR recognise that climate change is real.
ii) Many submissions refer to the overarching need to change behaviour to be more climate/biodiversity friendly and to transition to a low carbon economy in accordance with national, regional and sectoral policies. Submissions contend that all development and policy relating to same from this point on must be focused on mitigation of and adaptation to climate change. Many means of achieving this are referred to from reduction of carbon emissions, the use of energy efficient buildings, renewable energy generation, compact growth, waste management, increased emphasis on public and green modes of transport and electric/carbon neutral transport. Submissions also refer to different greenhouse gas reduction targets and the need to carry out a study to determine the levels of carbon sequestration throughout the County.	A0013 A0018 A0023 A0029 A0050 A0054 A0083 A0113 A0114 A0116 A0129 A0133 A0145 A0151	<p>The contents of these numerous submissions are noted. The National Planning Framework (NPF) has a very clear focus on achieving Compact Growth while the Regional Spatial and Economic Strategy (RSES) is underpinned by three cross cutting principles: healthy placemaking, climate action and economic opportunity.</p> <p>As a signatory of the Covenant of Mayors, Dún Laoghaire-Rathdown County Council (DLR) has committed to a 40% reduction in the Council's greenhouse gas emissions by 2030 and will endeavor to exceed this target. In accordance with the requirements of the National Adaptation Framework (2018), the Council has prepared and adopted the Dún Laoghaire-Rathdown County Council Climate Change Action Plan (DLR CCAP) (2019). It features a range of actions across five key areas - Energy and Buildings, Transport, Flood Resilience, Nature Based Solutions and Resource Management - to make DLR a climate resistant County.</p> <p>It is recommended that climate action be a key overarching theme of the entire Draft Plan.</p>
iii) Submissions refer to the need for the Council and the County Development Plan to play a leadership role in terms of climate action. The Council should provide advice and mentoring, and various workshops should be run to educate local community and different sections of the	A0029 A0032 A0074 A0100 A0133	<p>The Contents of this submission are noted. <u>This is not a County Development Plan Issue.</u></p> <p>Whilst not directly a County Development Plan issue, DLR complies with Statutory Instrument 426 (European Union (Energy Efficiency) Regulations 2014 in relation to its obligation to act in an exemplar role in energy efficiency and was awarded the national Leadership in the Public Sector Award from the Sustainable Energy Authority of Ireland in 2019 in recognition of its</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
community on climate action and reduction in energy consumption.		<p>exemplar role.</p> <p>DLR is actively engaging with staff and citizens about climate action from the benefits of renewables to providing tips on small steps that can be taken to reduce carbon. The Green Business Officer engages with businesses in the County. The Environmental Awareness Officer runs the Green Schools Programme. Home energy saving kits are available throughout DLR libraries to encourage citizens to be more energy aware.</p> <p>DLR hosted a local National Dialogue on Climate Action public workshop in December 2019. In conjunction with the Dublin Climate Action Regional Office (CARO), DLR are also investigating options for climate action workshops with funding from the EU LEADER Programme for eligible rural areas for DLR. The CARO have also been in contact with the Public Participation Networks (PPNs) and the Comhairle Na nÓg groups across the Dublin Local Authorities.</p> <p>It is recommended that climate action be a key overarching theme of the entire Draft Plan.</p>
iv) Submission recommends the use of CO2 neutral fleet for public services.	A0075	<p>The Contents of this submission are noted.</p> <p>Regional Policy Objective (RPO) 7.42 of the RSES requests that land use plans include proposals to facilitate and encourage an increase in EV's.</p> <p>Whilst the Council's transport fleet is not a County Development Plan issue per se, the Council is committed to increasing its electric fleet on a phased basis, this is Action T1 in the Climate Change Action Plan 2019-2024. In 2018, the fleet used 4.2 GWh of primary energy. This accounted for 8% of the Council's total emissions due to the reliance of the fleet on petrol and diesel. Converting the fleet to low-carbon vehicles is essential to reducing carbon emissions, and the Council is implementing a replacement programme for the electrification of DLR's fleet, where possible, to be completed by 2030. The Council will also explore the replacement of fleet vehicles with other lower emission alternatives. By upgrading its vehicles, the Council will reduce the impact of its fleet on local air quality by reducing nitrogen dioxide and</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
		<p>particulate matter associated with diesel vehicles.</p> <p>It is recommended that Policy ST21 of the current Plan which refers to electric vehicle roll out and charging be reviewed and updated to reflect RPO 7.42 of the RSES.</p>
<p>v) Various submissions recommend that DLR should provide grants, and funding for climate action including energy projects. Working with the community and residents' groups is considered important. One submission recommends that community led climate action grants should be directed to community groups through the Public Participation Network.</p>	<p>A0056 A0074 A0075 A0097 A0100</p>	<p>The contents of these submissions are noted. <u>This is not a County Development Plan issue.</u> Funding is available through the Sustainable Energy Authority of Ireland (SEAI) for energy upgrades of private houses to the homeowners and through Sustainable Energy Community initiatives. DLR provides support to these initiatives and energy awareness including free access to home energy saving kits through its network of libraries. DLR in association with the other Dublin local authorities, Codema and the CARO, will continue to seek technical and financial supports for a range of climate action measures. This includes a variety of international, European and national funding streams.</p> <p>DLR is also engaged in existing public participation structures and approaches that are bottom-up, local community centred and are outcome focused. These include the Public Participation Networks, Local Community Development Committees (LCDC), Tidy Towns, Sustainable Energy Communities, etc.</p>
<p>vi) Submission recommends that the County Development Plan should prioritise the establishment of low carbon zones, initially on a pilot basis. Schools and businesses located in these zones should be targeted with measures that encourage a shift away from unsustainable modes. Submission recommends preparing a travel plan for DLR.</p>	<p>A0080</p>	<p>The content of this submission is noted. <u>This is not a County Development Plan issue.</u> The development of Decarbonising Zones is included in the Climate Action Plan 2019 – To Tackle Climate Breakdown. Action 165 of the Climate Action Plan states: <i>“Extend flagship low-carbon projects in other towns and villages. Sub-Action: Each local authority will identify and develop plans for one ‘Decarbonising Zone’.</i></p> <p>Establishment of any low carbon pilot zone will be led by the Council Department with responsibility for Climate Action.</p> <p>The development of low carbon zones, Decarbonising Zones etc. should involve a broad range of stakeholders and be established on a robust evidence base, across a variety of climate areas</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
		<p>including electricity generation, heating and cooling and sustainable transport. The CAROs in conjunction with relevant energy agencies is working with relevant stakeholders on a suitable definition for a decarbonisation zone that could be used by Local Authorities. In consideration of developing a methodology to establish such zones in the Dublin context, it is also noted that Codema is currently developing a Dublin Region Energy Action Masterplan, which will build on the previous four Dublin local authority Spatial Energy Demand Analysis.</p> <p>The introduction of a workplace parking levy would require legislation and should not be imposed on individual places of employment. Regarding the Council's own travel patterns, the CCAP includes a range of transport actions addressing fleet operations, planning and public realm, active travel and behavioural change, and public transport.</p>
vii) Submission recommend that DLR develop a 'Just Transition' Plan with targets and goals that would enable the County to become carbon neutral.	A0097	<p>The contents of this submission are noted. The County Development Plan will have regard to the principle of a just transition in the development of policies. It is recommended that the Draft Plan align with the Climate Action Plan, but it should not replace or supersede it.</p> <p>The Council recognises spatial and land use planning are key instruments, by which both adaptation and mitigation measures are placed and delivered within the broader perspective of sustainable development.</p> <p>It is recommended that the Draft Plan be prepared having regard to the DLR CCAP 2019-2024.</p>
viii) Submission welcomes greater efficiency in land management via the prioritisation of infill and brownfield sites to reduce carbon footprint.	A0112 A0124	This submission is noted. The NPF and RSES for have a very clear focus on achieving compact growth and, more specifically, brownfield infill development.
ix) Submission notes how DLR Chamber has been promoting energy efficiency in partnership with DLR for many years and incorporates support for	A0137	This submission is noted and welcomed. DLR will continue to work closely with DLR Chamber and the business community on climate action.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
climate action and energy reduction initiatives in its awards.		
x) The submission from An Taisce recommends that the County Development Plan include targeted policies regarding greenhouse gas emissions. A strategy which would see the electrical generation needs of the County primarily met by renewable source, including use of local renewable energy sources, district heating and combined heat and power, and energy demand reduction measures is required. Regard should be had to examples in other countries such as France, which requires all new buildings in commercial areas to be partially covered by either solar panels or green roofs.	A0065	<p>The contents of this submission are noted. As a signatory of the Covenant of Mayors, DLR has committed to a 40% reduction in the Council's greenhouse gas emissions by 2030 and will endeavour to exceed this target. Currently, in accordance with the Building Control legislation which is separate to the Planning and Development Act, all new buildings must be designed to Nearly Zero Energy Building (NZEB) standard.</p> <p>RPOs in the RSES sets out several requirements in relation to Climate Action many of which fall under the remit of the CCAP and not the County Development Plan. Codema is currently developing a Dublin Region Energy Action Masterplan, which will build on the previous four Dublin Local Authority Spatial Energy Demand Analysis. Sperate to the County Development Plan, this masterplan will aid EMRA in the identification of Energy Zones as per RPO 7.35.</p>
2.2 Energy in Buildings		
i) Submissions requests the provision of grants and prioritisation for the retrofitting of houses to improve their energy rating.	A0002 A0013 A0077	<p>The contents of these submissions are noted. <u>This is not a County Development Plan Issue.</u></p> <p>As outlined in the DLR CCAP, the County will be included in the Dublin Region Energy Master Plan, which will examine these issues, separate to the preparation of the Draft Plan. The Council does not have a remit to provide finance or grant support to private sector residential retrofit or refurbishment works. Funding is available however through the national government body, SEAI for energy upgrades of private houses to homeowners, and through Sustainable Energy Community initiatives to communities. The Council has a direct remit in retrofitting and refurbishing its own social housing stock which is discussed below. RPOs in the RSES sets out several requirements in relation to climate action many of which fall under the remit of the CCAP and not the County Development Plan.</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
		<p>Regarding retrofitting RPO 7.40 of the RSES states “Local authorities shall include policies in statutory land use plans to promote high levels of energy conservation, energy efficiency and the use of renewable energy sources in existing buildings, including retro fitting of energy efficiency measures in the existing building stock and energy efficiency in traditional buildings. All new buildings within the Region will be required to achieve the Nearly Zero-Energy Buildings (NZEB) standard in line with the Energy Performance of Buildings Directive (EPBD).</p> <p>It is recommended that the Draft Plan have a policy objective which reflects RPO 7.40 of the RSES.</p>
ii) Submission requests the Council ensure rental properties comply with regulations ensuring adequate insulation.	A0077	<p>The contents of this submission are noted. This is not a County Development Plan issue. Rental properties are required to provide information on the Building Energy Rating (BER) to prospective tenants as per existing legislation. There is currently no regulatory requirement for these properties to achieve a BER. This is a national issue.</p>
iii) Submission requests that a concerted effort must be made to preserve the urban environment and recommends the provision of passive housing as well as the use of solar/photo voltaic power.	A0136	<p>The contents of this submission are noted. Currently all new buildings must be designed to NZEB standard in accordance with Building Control legislation and this is supported by RPO 7.40. Codema have been retained by the Council to advise on elements of the DLR CCAP and policies required in the County Development Plan to meet the RSES requirements.</p> <p>It is recommended that the Draft Plan include a policy objective which reflects RPO 7.40 of the RSES.</p>
iv) Submission from the Environmental Health Department, Health Service Executive recommends that a minimum Building Energy Rating of A3 or higher is achieved for the Council's housing stock and municipal buildings by 2028.	A0054	<p>The contents of this submission are noted. BER is not a County Development Plan issue as it is governed by a separate code to planning. All new buildings owned and occupied by Public Authorities after 31st Dec 2018 must be designed to NZEB standard.</p>
v) Submissions request that apartments and all new buildings are built to passive house standards	A0026 A0056	<p>The contents of this submission are noted. Currently all new buildings must be designed to NZEB standard in accordance with Building Control legislation and this is supported by RPO</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
and/or NZEB or strict energy efficient standards. One of the submissions requests that no new buildings should use fossil fuels for heating or food preparation. Another one seeks the use of solar panels where possible.	A0151 A0097	7.40 in the RSES. It is recommended that the Draft Plan include a policy objective which reflects RPO 7.40 of the RSES.
2.3 Renewable Energy		
i) Submissions seek the prioritisation of sustainable energy, particularly Sustainable Energy Communities (SECs) and recommends resourcing towns and villages to participate in Sustainable Energy Communities. One submission state that wave energy and off shore wind energy could be utilised as a SEC.	A0035 A0056 A0100	The contents of these submission are noted. During the preparation of the Draft Plan consideration will be given to including reference to SECs. Codema, DLR's energy advisors have been appointed as coordinators for SEAI SEC programme in the Dublin region.
ii) Submission from EirGrid welcomes the reference and emphasis placed on climate action and energy in the issues paper.	A0057	The submission from EirGrid is noted. It is recommended that Policy EI26 which deals with transmission be reviewed in the preparation of the Draft Plan.
iii) Submission from Fáilte Ireland refer to the need to update the DLR wind energy strategy.	A0101	The contents of this submission are noted. It is recommended that the existing DLR Wind Energy Strategy be reviewed as part of the preparation of the Draft Plan.
iv) Submissions seek policies which support green energy generation and refers to the potential to allow for off-shore wind farms and/or tidal energy generation. Reference is made to the NPF the RSES and the Draft National Marine Planning Framework and objectives contained therein.	A0103 A0116	The contents of these submissions are noted. Policy CC11 and 12 in the current Plan covers these issues. In the context of the Draft Plan it is recommended to retain and update these policies as appropriate. It should be noted that at present the Planning Authority has no jurisdiction in the maritime area beyond the high-water mark. The County Development Plan will be prepared having regard to a range of national, regional and local plans and strategies and Section 28 guidelines as published by the Department of Housing, Planning and Local Government, including the NPF, RSES, CCAP, Draft and final

Key Issue	Sub. No.	Executive's Opinion & Recommendation
		National Marine Planning Framework, Climate Action Charter, Guidelines and Wind Energy Development Guidelines.
v) One submission state that home-owners and developers should be encouraged to build with more energy capturing devices which could be in the form of solar-power or rain-capture for example. Submissions recommends that the grants available for the installation of photovoltaic (PV) panels could / should be augmented by the permitting of off-street parking for EVs in suitable locations.	A0097 A0135	DLR supports the use of energy capturing devices for generation of renewable energy and water capture devices where practicable. Codema have been retained by the Council to advise on elements of the DLR CCAP and policies required in the County Development Plan to meet the RSES requirements. However, the Council does not have a remit to provide finance or grant support to private sector residential works such as these. Funding is available through the national government body, SEAI for energy upgrades of private houses to homeowners, and through SEC initiatives to communities. It is recommended that the policies of the Draft Plan will encourage the promotion of greater use of these devices.
vi) Submission from the Electricity Supply Board (ESB) welcomes the continuation of specific policy objectives EI26 and CC111 and CC12.	A0105	The submission by the ESB is welcomed. In the context of the Draft Plan it is intended to review and update this policy as appropriate.
vii) Submission from GSI (Geological Survey Ireland) recommends that the Geothermal Suitability maps be used to determine the most suitable type of ground source heat collector for use with heat pump technologies in considering sustainable development and growth elements of the County Development Plan and associated environmental assessments and regarding the national climate action plan.	A0010	The submission from GSI is noted. RPOs in the RSES sets out several requirements in relation to Climate Action many of which fall under the remit of the CCAP and not the County Development Plan. Codema have been retained by the Council to advise on elements of the DLR CCAP and policies required in the County Development Plan to meet the RSES requirements. Separate to the County Development Plan, Codema is carrying out a revised Energy Assessment for DLR. Deep Geothermal will be considered in the County Development Plan Energy Assessment report as one of the local low-carbon heating sources within the County.
viii) Submission refers to the benefits of renewable gas including job creation in rural areas, and recommends production of renewable gas in Dún	A0114	The contents of this submission are noted. During the preparation of the Draft Plan it is recommended that policy CC11 will be updated to include reference to renewable gas/anaerobic digestion. Ireland's first gas injection facility is in operation and Gas Network

Key Issue	Sub. No.	Executive's Opinion & Recommendation
Laoghaire-Rathdown which can be injected into the gas network		<p>Ireland intends to facilitate several additional gas grid injection points, over the next decade. A National Green Gas Certification Scheme is currently being finalised and will assist in the tracking and accreditation of renewable gas as an energy source.</p> <p>The Council will continue to work with Codema and CARO to identify renewable energy opportunities to reduce fossil fuel dependence.</p>

Section 3: People, Home & Place

Key Issue	Sub. No.	Executive's Opinion & Recommendation
3.1 Residential Development		
3.1.1 Sustainable Communities		
i) Submission recommends that policies should emphasize the importance of neighbourhood centres. Such policy should protect these urban areas whilst encouraging infill development, creating higher densities and diversity of population.	A0023	The Council agrees with the sentiment of this submission and it will inform the Draft Plan. In line with objectives contained in both the National Planning Framework (NPF) and the Eastern and Midlands Regional Spatial and Economic Strategy (RSES), it is recommended that the Draft plan focuses on compact urban growth, i.e. higher residential densities in existing built up areas whilst creating sustainable communities / local neighbourhoods with commensurate social / community infrastructure.
ii) Submission seeks the provision and retention of communities where there is a good sense of place and where people feel connected to the area.	A0036 A0072	The Council agrees with the sentiment of the submissions. In line with objectives contained in both the NPF and the RSES, it is recommended that the focus on sustainable communities be strengthened in the Draft Plan with existing policies being reviewed and updated.
iii) Submissions relate to the provision of adequate physical and social infrastructure as follows: <ul style="list-style-type: none"> • That social infrastructure and community support facilities, such as schools, doctors, community centres, childcare facilities etc. are provided prior to or in tandem with new residential development. • Residential development should not be permitted where existing infrastructure cannot cope. • Communities should be walkable and cyclable, with a view to creating age and family friendly communities. • There is a need for more doctors and schools in the County area, particularly in Stepaside. 	A0050 A0055 A0056 A0069 A0072 A0075 A0118 A0140	The Council agrees with the sentiment of these submissions. In order to identify the future requirements for the County and assist in updating and/or developing policy objectives, the preparation of the Draft Plan involves extensive engagement across a number of Council Departments and Prescribed Bodies including, but not limited to, the Council's Community Section, Drainage, Transportation and Parks Departments, the Department of Education and Skills, Irish Water and the Health Service Executive (HSE). The NPF and RSES both promote healthy placemaking and the creation of attractive, inclusive, age friendly, walkable communities. <p>In preparing the Draft plan it is recommended that the following policies are examined:</p> <ul style="list-style-type: none"> • Policy objectives aimed at providing high-quality places to live. • Policy objectives aimed at ensuring adequate community infrastructure is provided in tandem with residential development, e.g. requirement of a community audit. • Policy objectives aimed at supporting the development of new schools, childcare facilities, healthcare facilities, community facilities etc., as required.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
iv) Submissions refer to the creation of healthy communities. The submissions request that: <ul style="list-style-type: none"> • A healthy and contented population is a primary consideration for new developments. • Adequate green spaces and recreational areas are provided. • Issues of wellness and the environment should be given more consideration. 	A0050 A0140	<p>The Council agrees with the sentiments of the submissions. The NPF and the RSES both promote healthy placemaking, climate action and the creation of attractive places to live and support the objectives of public health policy. The current Plan includes a suite of policies and guidance aimed at protecting and enhancing the environment, open space provision and encouraging high quality design of both the built environment and public realm.</p> <p>It is recommended that the Draft Plan continues to support high quality design, seek to protect and enhance our built and natural environments and include more specific policy objectives in relation to healthy placemaking.</p>
v) Submission from An Taisce sets out a number of recommendations in relation to sustainable residential development including: <ul style="list-style-type: none"> • The plan must accord with the Sustainable Residential Development in Urban Areas Guidelines. • The plan should include policies that prevent large-scale suburban type developments. • New development should be commensurate with local physical and social infrastructure using the sequential approach. • Provide policies for alternatives to unsustainable, urban generated one-off housing, e.g. serviced site policy. • The seven location test standards for community integration for new housing (Box 5.2 of the National Spatial Strategy) should be applied as threshold standards. 	A0065	<p>The content of this submission is noted and will be taken into consideration in preparing the Draft Plan.</p> <p>The Draft Plan must be consistent with the NPF, RSES and have regard to Planning Guidelines issues under the provisions of Section 28 of the Planning and Development Act, 2000 (as amended). Dún Laoghaire-Rathdown is located within the Dublin Metropolitan Area and much of the County is also within the Dublin City and Suburbs area set out within the RSES settlement strategy. Accordingly, a key aim of the Draft plan will be to facilitate compact urban growth in tandem with the promotion of healthy placemaking and creating sustainable communities with commensurate physical and social / community infrastructure.</p> <p>With regard to one-off rural housing, the Draft Plan will continue to control the spread of one-off rural housing and will align policy objectives with National Planning Objective (NPO) 19 in the NPF which distinguishes between areas under urban influence and elsewhere.</p>
vi) Submissions recommend increasing social and	A0100	<p>The Council agrees with some of the sentiments of the submissions. <u>Some items however are</u></p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<p>community integration to promote a healthier society and making towns and villages more accessible and inviting. The following initiatives have been suggested in this regard:</p> <ul style="list-style-type: none"> • More emphasis placed on section 2.1.3(iii) 'Planning for Sustainable Communities, specifically with regard to Dún Laoghaire. • Ensure that communities cater to the needs of all people in their life cycle, including children, disabled and older persons. • Support for annual street parties. • Closing of residential estates after school hours to facilitate safe play. 	<p>A0133 A0147</p>	<p><u>not County Development Plan issues.</u></p> <p>Both the NPF and the RSES contain objectives to create <i>“attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being”</i> (NPO4).</p> <p>In line with objectives contained in both the NPF and the RSES, the focus on sustainable communities will be strengthened in the Draft Plan with existing policies being reviewed and updated.</p>
<p>vii) Submission welcomes development in Foxrock that enhances community and amenity and also recognises physical attributes of the area including bedrock, amenities and transport network.</p>	<p>A0113</p>	<p>The content of this submission is noted.</p>
<p>3.1.2. Density and Compact Growth</p>		
<p>i) Submissions received regarding residential density both agree and disagree with higher densities and compact growth and request that:</p> <ul style="list-style-type: none"> • New developments should be permitted at higher densities to encourage efficient use of land. • Policy RES3 is updated in order to provide sufficient protection of residential amenities. • Policy RES3 should be clearly linked to 	<p>A0026 A0036 A0056 A0059 A0072 A0102 A0104 A0133 A0142</p>	<p>The contents of the submissions are noted. The first National Strategic Outcome (NSO) in the NPF sets out the goal of <i>“sustainable growth of compact cities, towns and villages”</i> with <i>“achieving effective density and consolidation, rather than more sprawl of urban development”</i> as a top priority.</p> <p>Regional Strategic Outcome (RSO) 1 in the Eastern and Midlands Regional Spatial and Economic Strategy (RSES) seeks to <i>“Better manage the sustainable and compact growth of Dublin”</i>. As per Regional Policy Objective (RPO) 3.2, in order to achieve compact urban development <i>“at least 50% of all new homes within or contiguous to the built up area of</i></p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<p>development management.</p> <ul style="list-style-type: none"> Increased density should be provided through increased building heights and concentrating development in existing built up areas and where there is good public transport. The health and social implications of high-rise development is considered Potentially reduce densities as development moves away from public transport corridors, Major Centres, Secondary Centres and Future Growth Areas. Frequency of bus service should be a consideration in permitted densities. Higher residential densities and better mixing of work, home, retail and cultural uses in the one neighbourhood and in the one city block. All existing urban areas need to be densified whilst providing vibrant communal spaces. Concern expressed in relation to the NPF commitment to compact growth particularly in relation to the area around Foxrock Golf Course. There is scope to restore and refit existing buildings within the county to create mixed use developments that meet the needs of an ageing population and to bring life into areas that are failing. 	<p>A0143 A0151</p>	<p><i>Dublin city and suburbs</i>” and RPO 4.3 supports “<i>the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin City and suburbs.</i>”</p> <p>RPO 3.3 in the RSES states that delivery of increased residential densities should be in line with a suite of guiding principles provided in the RSES and in the following planning guidelines:</p> <ul style="list-style-type: none"> ‘Sustainable Residential Development in Urban Areas’, 2009 ‘Sustainable Urban Housing; Design Standards for new Apartments Guidelines’, 2018 ‘Urban Development and Building Heights Guidelines for Planning Authorities’, 2018. <p>The current Plan provides a suite of policies and guidance regarding the appropriate increase in residential densities and protection of existing amenities. Section 8 of the current Plan contains extensive policy and guidance regarding design, height, layout and open space amongst other criteria aimed at safeguarding and providing adequate amenity value.</p> <p>In line with national and regional policy objectives and Planning Guidelines, the Draft Plan will seek to encourage higher densities within the existing built up areas of the County and provide guidance regarding how such development can be provided having regard to existing visual and residential amenities.</p> <p>The Core Strategy of the Draft Plan will identify the appropriate locations for new development. The Draft Plan will include a Building Height Strategy and update and/or add policy objectives and guidance to align with the NPF, RSES and all relevant planning guidelines.</p>
<p>ii) Submission raises concerns in relation to</p>	<p>A0068</p>	<p>The content of the submission is noted and will inform preparation of the Draft Plan.</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
infrastructure capacity and amenity of the County.		
iii) Submission requests that the Ardilea area is acknowledged as being remote from transport and growth corridors and therefore higher densities should not apply.	A0102	The content of this submission is noted. As detailed in the response to Section 3.1.2 i) above, Dún Laoghaire-Rathdown is located within Dublin Metropolitan Area. As per the growth strategy contained within the RSES, Ardilea is located within the Dublin City and Suburbs area. Ardilea is within 500m of 'Proposed Quality Bus-Bus Priority Routes' along Roebuck Road and Fosters Avenue and is therefore not considered to be remote from public transport.
iv) Submission seeks enabling policies that may be needed to allow backland or brownfield sites to benefit from new connections.	A0112	The content of the submission is noted and will inform preparation of the Draft Plan.
v) Submission criticises a perceived obsession with "high density" and outlines a number of concerns in relation to units without gardens or balconies.	A0138	The content of this submission is noted. Higher densities are not necessarily achieved through the development of apartments alone. The Council would disagree with the negative views noted in the submission regarding apartment developments. All such developments have access to communal and/or public open space providing residents with outdoor amenity space. Arrangements regarding security, pet ownership, drying of laundry etc. are a matter for individual management companies overseeing multi-unit developments.
vi) Submission requests that the density of housing in the Rathmichael area to be lowered from 35 houses per hectare to a 6-8 houses per hectare.	A0150	The content of this submission is noted. The suggested residential density is significantly lower than the minimum residential density of 35 units per hectare set out within Section 28 Guidelines and would fail to align with the requirements of national and regional policy objectives. It is therefore not recommended that densities be lowered in Rathmichael.
3.1.3 Existing Housing Stock & Densification		
i) Submission encourages densification of residential areas, such as around Dún Laoghaire Town, to help boost commerce.	A0041	The content of the submission is noted and will inform preparation of the Draft Plan. The Draft Plan will align with the NPO 11 of the NPF which favours " <i>development that can encourage more people and generate more jobs and activity within existing cities, towns and villages.</i> "

Key Issue	Sub. No.	Executive's Opinion & Recommendation
3.1.4 Living over the Shop		
i) Submissions recommend that incentives or penalties are used to encourage the change of use of unused upper floors of businesses or vacant / unused commercial units into residential use.	A0059 A0147	The contents of the submissions are noted. Policy RES4: Existing Housing Stock and Densification and Section 8.2.3.4 (ix) 'Living-Over-the-Shop' in the current Plan supports 'Living-Over-the-Shop' schemes and provides several derogations to facilitate such developments. It is recommended that this policy be reviewed and updated in the Draft Plan.
3.1.5 Mix of House Types		
i) Submissions note the importance of housing mix in new developments and request: <ul style="list-style-type: none"> • that apartment developments for smaller households. • That smaller 1 and 2-bed units are promoted. • That there is more diversity of house types. • That a mix of house type is balanced with appropriate infrastructure and environmental impacts. • That there are restrictions in relation to apart-hotels, co-living developments and developments. • That co-housing models are explored to create a community. • That a policy is included to encourage and support off-campus student accommodation. • That consideration is given to co-operative housing models. 	A0042 A0056 A0083 A0122 A0133 A0140 A0143 A0145	The contents of the submissions are noted. Section 2.1.3 (ii) 'Categories of House Types, Sizes and Tenures, which incorporates Policy RES7: Overall Housing Mix in the current Plan encourages a range of housing types and tenures. Policy objectives in the NPF and RSES and, additionally in planning guidance, advocate for sustainable communities providing for a range of house type and tenure. RPO 9.1 of the RSES requires a County Development Plan to integrate age friendly and family friendly strategies and include provision for flexible housing typologies, buildings and public spaces. Additionally, RPO 9.4 states that " <i>Design standards for new apartment developments should encourage a wider demographic profile which actively includes families and an ageing population.</i> " It is intended that Section 2.1.3 (ii) will be retained and expanded upon, as required, in the Draft Plan in order to align with the requirements of national and regional policy and guidance.
ii) Submissions specifically refer to 'Build-to-Rent' and	A0102	The content of the submissions are noted and will inform the Draft Plan. The criteria for

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<p>shared accommodation schemes. As such it is stated / requested:</p> <ul style="list-style-type: none"> • That the plan sets out appropriate policy and locations for 'Build-to-Rent' and 'shared accommodation' schemes. • That such developments are located in central and suburban areas of Dublin, including Cherrywood. • Limits to 'Build-to-Rent' developments are not applied. • That there is no scope for 'Build-to-Rent' in Dundrum and surrounds. • Transient nature of tenancies in 'Build-to-Rent' developments militates against community creation. 	<p>A0108 A0112 A0121 A0124 A0131 A0151</p>	<p>'Build-to-Rent' and 'Shared Accommodation' schemes are set out under Specific Planning Policy Requirements (SPPR) 7, 8 and 9 in the 'Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities', 2018. These forms of residential accommodation add to the mix of housing typology in the County. It is recommended that the Draft Plan include policy on same.</p> <p><u>The Cherrywood Strategic Development Zone (SDZ) Planning Scheme is a standalone statutory document and cannot be amended under the County Development Plan review.</u></p> <p>The Cherrywood SDZ planning scheme was amended in 2017 and again in 2018 to incorporate the provisions of the 'Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities', 2015 and its amendments in 2018.</p>
<p>iii) Submission suggests that creating homes for people to live in should be the goal for the County.</p>	<p>A0133</p>	<p>The Council agrees with the sentiment of this submission. It is recommended that the Draft Plan include policy objectives regarding housing choice for residents of the County.</p>
<p>iv) Submission requests that 3-storey houses are no longer permitted as they are not an access-friendly design. The concept of a 'house for life', however, should be encouraged.</p>	<p>A0138 A0140</p>	<p>The content of the submissions are noted. Three storey dwellings add to the housing mix of an area, in this regard the Council would not be in favour of adding a policy to prevent such units. The Draft Plan will, however, include policy objectives that support the provision of flexible housing typologies and lifetime adaptable homes in accordance with national and regional policy objectives.</p>
<p>v) Submission states that 'sustainable' development does not mean single-ownership, single-land use, or single house-type developments.</p>	<p>A0143</p>	<p>The content of the submission is noted. <u>While land ownership is not a County Development Plan issue, the Draft Plan will include policy objectives regarding a mix of house type and tenure in accordance with national and regional policy objectives.</u> Changes in the type of accommodation – with the introduction of new forms such as shared living and 'Build-to-Rent' – has meant that tenure of these types of accommodation may be an issue.</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
		Recommendations with regard to the appropriate number of these types of accommodation may come from the future Housing Need and Demand Assessment (HNDA). It is recommended that the Draft Plan contain policies on location.
vi) Submission requests that the needs of certain age groups, and the provision of a diverse range of accommodation is not neglected due to 'Build-to-Rent' schemes for 'young professionals' or on tax incentive led student accommodation.	A0147	The content of the submission is noted. 'Build-to-Rent' and Student accommodation both add to the mix of housing typology in the County. The Draft Plan will include policy objectives with regard to a range of house type and tenure to suit the emerging demographic needs of the County in accordance with national and regional policy objectives.
vii) Submission supports the provisions in the current plan on urban villages, variety and mix of unit types and protection of the character of existing villages.	A0151	The content of this submission is noted and welcomed.
3.1.6 Social Housing		
i) Submissions relate to social housing as follows: <ul style="list-style-type: none"> Request that more rental purchase, affordable and social housing units are constructed. Request that social housing is dispersed across the County. 	A0041	The content of the submission is noted and will inform the Draft Plan preparation. The Council provides social housing through a suite of options provided for in Rebuilding Ireland: Action Plan for Housing and Homelessness. These include direct build, acquisitions, Part V, leasing and through working in partnership with Approved Housing Bodies (AHBs). As a result, social housing is interspersed in private housing developments across the County. <u>The allocation of social housing is not a County Development Plan issue.</u>
ii) Submissions notes specific and often complex needs, of persons who are disabled, ageing, blind or visually impaired and requests that such needs are considered when allocating accommodation.	A0052 A0053	The contents of the submissions are noted. <u>The allocation of housing is not a County Development Plan issue.</u> The Council provides social housing support for older people and persons with a disability, through many forms including its own construction programme with homes specifically designed for older people at Rochestown House, The Brambles, The Mews and Broadford Rise. The Council's downsizing option continues to be promoted among older

Key Issue	Sub. No.	Executive's Opinion & Recommendation
		<p>people. In addition, the Council continues to provide support for private homeowners to carry out adaptation works to allow them to remain in their own homes through the Housing Adaptation Grant for People with a Disability, the Mobility Aids Grant and the Housing Aid for Older Persons Grant scheme.</p> <p>It is recommended that the Draft Plan contain policy objectives that continue to support the provision of housing for all.</p>
3.1.7 Affordable Housing		
<p>i) Submissions relate to social and affordable housing as follows:</p> <ul style="list-style-type: none"> • Request that affordable units are provided in higher blocks. • Requests a strategy for affordable housing is contained in the plan. • Request a policy requiring all new developments to include affordable homes for purchase. • Affordability is an important issue for younger and future generations. • Request that suitable affordable housing is provided for people with disabilities. • Request that more rental purchase, affordable and social housing units are constructed. 	<p>A0003 A0053 A0081 A0137 A0140 A0151</p>	<p>The contents of the submissions are noted.</p> <p>Revisions to Part V of the Planning and Development Act, 2000 (as amended) as set out under the Urban Regeneration and Housing Act, 2015 stood down a legislative requirement in relation to affordable housing.</p> <p>It is acknowledged that affordability is an issue in DLR. With the changes to Part V the statutory basis to require affordable housing under the Planning Acts has been removed.</p>
<p>ii) Submission suggests raising property taxes to fund affordable housing.</p>	<p>A0042</p>	<p>The content of the submission is noted. <u>Funding / property tax, however, is not a County Development Plan issue.</u></p>
<p>iii) Submission requests that more houses, both for</p>	<p>A0081</p>	<p>The contents of the submissions are noted. It is recommended that the Draft Plan continues</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
sale and for rent, are built in order to deal with the housing crisis	A0137	to promote the delivery of housing across the County in line with national and regional policy objectives and guidance. It is noted however that permissions granted do not always result in comparative levels of construction activity.
3.1.7 Housing for All		
i) Submission requests a renewed focus on Policy RES9 'Housing for All' and seeks support of independent and/or assisted living for older people and people with disabilities/mental health issues.	A0147	The content of the submission is noted. It is recommended that that Policy RES9 in the current Plan be reviewed and expanded upon, as required, in the Draft Plan in order to align with the requirements of National and Regional policy and guidance.
ii) Submission requests that the plan facilitates inter agency agreements to facilitate supported housing for elderly people and people with disabilities.	A0151	The content of the submission is noted. The Council works in partnership with several AHBs to deliver homes for older people and persons with a disability, through the Capital Assistance Scheme.
Housing for Older Persons		
iii) Submissions recommend that downsizing should be a priority in order to free up housing stock. In this regard: <ul style="list-style-type: none"> • Incentives should be provided for older persons to move to smaller units. • Such development should be located within a short walking distance of a village or town centre. • The quantum of 'build to let' apartment developments being permitted, specifically in the Dundrum area, limits opportunities for older people to downsize. • Each new development should have a set percentage of units to be made available for 	A0042 A0074 A0097 A0100 A0131	The contents of the submissions are and will inform the Draft Plan preparation. The current Plan fully supports downsizing opportunities through a number of policies, namely Policy RES7: Overall Housing Mix and RES9: Housing for All. Both the NPF and the RSES include policy objectives supporting the provision of age friendly communities and downsizing opportunities. In 2019 the Government published 'Housing Options for Our Ageing Population Policy Statement' which acknowledges the changing demographics of the country and the change in housing needs for older people. The DLR 'Age Friendly Strategy', 2016-2020 incorporates national policy on ageing and sets out a series of goals and actions for the County, including the provision of housing choice and options for older people. The Age Friendly Strategy is currently under review. The Council's Housing Department also operate a downsizing scheme. The issue of incentives is not a County Development Plan issue. It is recommended that the Draft Plan continues to support

Key Issue	Sub. No.	Executive's Opinion & Recommendation
downsizing opportunities.		housing choice for older persons.
iv) Submissions relate to the needs of the elderly as follows: <ul style="list-style-type: none"> • Recommends that consideration is given to developing communities with elderly specific accommodation. • Requests that the plan responds to the needs of the elderly especially in the Dundrum area. • Recommends that the plan includes a specific section on age friendly housing. 	A0097 A0133 A0151	The contents of the submissions are noted and will inform the Draft Plan preparation.
v) Submission supports inclusive living and suggests: <ul style="list-style-type: none"> • The incorporation of dementia villages. • Provision of more nursing homes and assisted living accommodation within urban centres. • Provision of meeting places for older persons. • That housing for older persons and/or assisted living accommodation should be located on lands near existing neighbourhood centres. (Specific reference to Stepside). 	A0100 A0125 A0133 A0136	The contents of the submissions are noted and will be taken into consideration in preparing the Draft Plan. <u>Some of the items are very detailed and are beyond the scope of a County Development Plan.</u> Such items may be better suited to the Age Friendly Strategy which is under review. DLR is committed to becoming an Age Friendly County with a wide range of initiatives to support this including support for inter-generational activities which can enhance quality of lives for both young and older people and help older people in staying active in their local communities.
vi) Submission welcomes the insertion of the Age Friendly Strategy in the County Development Plan but is concerned that advancing the strategy may not be a Council priority re. the allocation of funding. (Specific reference to Goatstown)	A0109	The contents of the submission are noted. <u>Funding for individual projects is not a County Development Plan issue.</u>
<i>Housing for Disabled Persons</i>		
vii) Submission requests that, in terms of housing for	A0053	The contents of the submission are noted and where relevant they will inform the Draft Plan

Key Issue	Sub. No.	Executive's Opinion & Recommendation
disabled persons that DLR: <ul style="list-style-type: none"> • Promotes a choice in living accommodation for persons with disabilities. • Facilitates a more transparent allocation system through, for example, making data publicly available. • Create specialized housing lists for persons with a disability. • Strengthen relationships and partnerships with Housing Bodies and HSE. • Improve communications with applicants. 		preparation. Many items raised fall outside the remit of the County Development Plan. With regard to the Councils housing stock, the social housing application matches the applicant's housing need with properties as they become available, which includes required adaptations and areas of choice. In addition, in 2019 DLR implemented a choice based letting system for standard property which allows applicants to bid on a property they would be interested in. A review of the current of the current Housing Allocations Scheme has begun and the comments are noted.
viii) Submission requests the development of residential centres for disabled and older people in an effort to free up larger residential properties. An incentive in this regard could apply.	A0059	The content of the submission is noted. There has been a concerted move away from congregated settings with the emphasis moved to providing accommodation for persons with disabilities within the community. It is recommended that current Policy RES9: Housing for All be reviewed and updated in the Draft Plan.
ix) Submission requests that disabled people are considered when providing facilities for all.	A0136	The content of the submission is noted. The current Plan contains a suite of policies aimed at including all residents, including disabled people, in the County in new developments including both residential and non-residential developments. This inclusivity will continue to be promoted in the preparation of the Draft Plan.
3.1.8 Homeless Accommodation		
i) Submissions relate to homelessness and requests that there is an increase in the number of homes available and that DLR are more accountable.	A0013 A0029	The contents of the submissions are noted. The allocation of social housing is not a County Development Plan issue. The Draft Plan will, however, contain policy objectives to continue supporting the provision of social housing across the County.
3.1.9 Refuge Accommodation		
i) Submission recommends the provision of safe	A0100	The contents of the submission are noted. DLR has linked with Tusla in relation to domestic

Key Issue	Sub. No.	Executive's Opinion & Recommendation
refuges within the community for those at risk of domestic abuse.		violence services and provision within the County. It is an objective of the current Plan to support the facilitation of the provision of a women's and family refuges for victims of domestic, sexual and gender-based violence in the County, with the involvement and support of Tusla the Child and Family Agency, the primary statutory agency for the provision of domestic violence related services and provision and other relevant agencies.
3.2 Social Inclusion		
i) Submission requests that the following groups are incorporated into all aspects of the County Development Plan – urban design, transport, community facilities: children, families, elderly and the disabled.	A0151	The contents of the submission are noted and will be taken into consideration in the preparation of the Draft Plan.
ii) Submission request that the Council invest in making Dundrum Village a model of best international practice for children and adults with disabilities.	A0151	The content of the submission is noted. The Draft Plan will include policy objectives with regard to the needs of all people, and all abilities, throughout the entire County. Matters with regard to specific areas such as Dundrum will be dealt with under its Draft Local Area Plan.
3.3 Community Infrastructure		
3.3.1 Educational Facilities		
<i>School Provision</i>		
i) A number of submissions were received in relation to the provision of schools and they request: <ul style="list-style-type: none"> That schools are prioritized in developing the County in the period 2022 – 2028. That new schools are provided for 	A0024 A0060 A0069 A0078 A0085	The Council agrees with the sentiment of the submissions. The Council will continue to work with the Department of Education and Skills (DES) with regard to the provision of schools. In order to achieve compact urban growth, national and regional policy objectives require the provision of appropriate supporting community and social infrastructure, including good

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<p>immediately.</p> <ul style="list-style-type: none"> That new schools are required where new communities / developments have been built (e.g. there are school capacity issues around Culanor and Honeypark). That the Plan includes objectives regarding schools that are informed by the requirements of the Department of Education having regard to area-based provision and needs. Requests that DLR invests heavily in primary and secondary schools in the County. New schools are required in Stepside. 		<p>access to education. RPO 9.21 in the RSES states that “<i>where significant new housing is proposed, an assessment of need regarding schools provision should be carried out in collaboration with the Department of Education and Skills and statutory plans shall designate new school sites at accessible, pedestrian, cycle and public transport friendly locations</i>”.</p> <p>Policy SIC8: Schools in the current Plan states: “<i>It is Council policy to ensure the reservation of primary and post-primary school sites in accordance with the requirements of the relevant education authorities and to support the provision of school facilities and the development / redevelopment of existing schools throughout the County</i>”. This policy will be retained and updated to align with National and Regional policy and the requirements of the DES in the Draft Plan.</p>
<p>ii) Submission states that there is a requirement for schools and doctors specifically in the Stepside area.</p>	<p>A0068 A0069</p>	<p>The contents of the submission are noted. New schools have been both permitted and/or constructed since the adoption of the current Plan, including, Stepside Educate Together primary school at Belarmine (Reg. Ref. D16A/0542) and a new post-primary school to serve the area at Leopardstown Valley (Reg. Ref. D18A/1171).</p>
<p>iii) Submission from the Department of Education and Skills (DES) requests:</p> <ul style="list-style-type: none"> That consideration is given to the inclusion of a community and infrastructure land use zoning objective. That sites identified by the DES for school provision are explicitly supported through appropriate zoning and/or SLOs in the plan. That consideration is given to the application of mixed-use land use zones in established areas. This has implications in relation to the acquisition of land in areas in need of school 	<p>A0134</p>	<p>The Council welcomes the submission from the DES. In accordance with Section 10 of the Planning and Development Act 2000 as amended, the Council cannot consider at this Pre-Draft stage of the review process submission or observations relating to zoning and/or rezoning of specific parcels of land. It is recommended that the INST symbol as it relates to school sites needs to be reviewed as part of the County Development Plan review process.</p> <p>On the identification of sites, unfortunately the submission does not explicitly list any additional sites identified by the DES for school provision. It is recommended that the Council contact the Department of Education to obtain a list of the sites referenced which can feed into the Draft Plan preparation. It is also recommended that the schools identified in Local Area Plans be included in the Draft Plan</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<p>development.</p> <ul style="list-style-type: none"> • That DLR is mindful of school provision beyond the lifetime of the plan and ensures that sufficient land is protected for school sites. • That consideration should be given for education development zoning adjacent to established schools in order to allow for future expansion. 		See also section 11.1.3 Institutional Lands (INST) Objective
<p>iv) Submission from the DES states that there would be a significant requirement for both primary and post primary education provision based upon the population projections for the County. Submission includes a number of request (see also section 11 Institutional Lands) including:</p> <ul style="list-style-type: none"> • a request that DLR is mindful of school provision beyond the lifetime of the plan and ensure that sufficient land is protected for school sites. • That consideration is given to potential synergies with adjacent facilities in the siting of schools. 	A0134	<p>The Council welcomes the submission from the DES. The Council will continue work closely with and be guided by the DES with regard to the provision of schools throughout the County. In this regard, it is recommended that policy formulation will have regard to the submission.</p> <p>Policy SIC8: Schools in the current Plan states: <i>“It is Council policy to ensure the reservation of primary and post-primary school sites in accordance with the requirements of the relevant education authorities and to support the provision of school facilities and the development / redevelopment of existing schools throughout the County”</i>. This policy refers to the potential synergies between schools and other complementary functions of a school site outside of school hours that may benefit the wider community</p> <p>Policy SIC8 will be retained and updated to align with National and Regional policy and the requirements of the DES in the Draft Plan. Additionally, a review of school sites will be carried out and consideration will be given to further protection for existing schools and their supporting on-site facilities. (See also section 11.1.3 Institutional Lands (INST) Objective).</p>
School Type		
<p>v) The submissions request the provision of:</p> <ul style="list-style-type: none"> • More educate together schools and to phase 	A0003 A0060	The contents of the submissions are noted.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<p>out all religious influence in education.</p> <ul style="list-style-type: none"> • More multi-denominational senior schools and associated facilities, in the Dún Laoghaire area. 		<p>The ethos of a school is not a County Development Plan issue, rather it is a function of the Department of Education and Skills.</p>
<p>vi) Submission requests that the Draft Plan includes appropriate policies for the development of urban schools that have regard to the character and density of development in the areas within which they are to be located.</p>	<p>A0085</p>	<p>The content of the submission is noted and will be taken into consideration in preparing the Draft Plan. The Council will be guided by the DES in relation to school design and location. In this regard, the DES 'Technical Guidance Document (TGD-025), Identification and Suitability Assessment of Sites for Primary Schools', 2019, and 'Technical Guidance Document (TGD-027), Identification and Suitability Assessment of Sites for Post Primary Schools', 2019 make reference to the provision of urban schools.</p>
<p><i>Use and protection of School Sites</i></p>		
<p>vii) Submission requests:</p> <ul style="list-style-type: none"> • That DLR enters into an agreement with the Dept of Education and Skills regarding the joint ownership of and/or use of open space. • That DLR protects school lands. 	<p>A0074 A0097 A0151</p>	<p>The content of the submissions is noted and will inform the Draft Plan preparation. Policy SIC8: Schools in the current Plan refers to the potential synergies between schools and other complementary functions of a school site outside of school hours that may benefit the wider community. (See also Section 11 Institutional Lands and schools).</p>
<p><i>Higher & Further Education</i></p>		
<p>viii) Submission requests that more adult learning courses are available (both morning and evening) in the County.</p>	<p>A0068</p>	<p>The content of the submission is noted. Whilst the provision of adult learning course is not a County Development Plan matter, it is recommended that the Draft Plan continue to support the provision of educational facilities across the County.</p>
<p>ix) Submission requests that the upcoming development plan recognises and acknowledges the "UCD Students' Strategic Vision", which was prepared by the UCD Planning & Environmental Policy Society. Submission also requests that the upcoming development plan includes a specific</p>	<p>A0083</p>	<p>The content of this submission is noted. While acknowledging the work of the Students' Union in preparing the plan the Planning Authority cannot endorse a non-statutory plan of any particular community group or body. Policy SIC9 in the current Plan, which relates to Third and Fourth level Institutions does reference the University Campus Plan which has been prepared by the governing body, however the current Plan is clear to state that "The Planning Authority will continue to work with UCD in relation to advancing campus development in</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
policy to support and facilitate the implementation and realisation of the "UCD Students' Strategic Vision".		<p><i>accordance with both the County Development Plan and National Policies and guidance".</i></p> <p>Much of the vision relates to issues that require cooperation with the governing authority as opposed to the Local Authority – for example, ensuring the campus is diverse and inclusive, ensuring sufficient opportunities to socialise, provision of adequate study spaces etc. Other aspirations around high quality design, maximising biodiversity and provision of softer modes of transport are all in line with the policy thrust of the Draft Plan.</p>
3.3.2 Childcare		
<p>i) Submissions with regard to childcare including from the HSE state that that there is a shortage of childcare facilities in the County (in some instances childcare facilities that formed part of planning permissions are not being implemented) and requests:</p> <ul style="list-style-type: none"> • That childcare provision is considered in tandem with new housing. • That provision of childcare facilities in 3rd level institutions is improved. • That facilities are specifically designed, and purpose built, in new developments. • That all such facilities should have adequate outdoor play space. • That facilities are in place for creating "outdoor classrooms". • That provision is made for childcare to support those who are participating in education. 	<p>A0005 A0054 A0097 A0100</p>	<p>The contents of the submissions are noted and will inform the Draft Plan preparation where relevant. It is noted that some items raised relate to standards of accommodation which is a matter for Tusla and not the Planning Authority.</p> <p>Policy SIC11: Childcare Facilities in the current Plan promotes and facilitate the provision of childcare facilities throughout the County and requires that significant residential developments of 75 units or more provide a childcare facility. The Council will support the provision of new childcare facilities in both purpose-built and other suitable premises, including existing dwellings, subject to compliance with policies and guidance. Such facilities can provide childcare places within areas of high demand.</p> <p>It is recommended that the Draft Plan consider the inclusion of an operational / phasing requirement for new childcare facilities.</p>
ii) Submission states that there has been a reduction	A0097	The content of the submission is noted. This is not a County Development Plan issue.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
in further education attendance with regard to childcare courses.		
iii) Submission calls for the provision of adequate services for children including creches, playgrounds, and facilities for extra-curricular activities.	A0136	The content of the submission is noted and will be taken into consideration in the preparation of the Draft Plan.
3.3.3 Health and Healthcare Facilities		
Healthy Ireland		
<p>i) Submission from Head of Service Health and Wellbeing, Community Healthcare East suggests that healthy development concepts should be considered i.e.</p> <ul style="list-style-type: none"> • Autistic friendly developments/villages, • Sensory gardens as part of park areas being development or upgrading of park areas to meet the needs of the of communities. • Development of older persons sheltered villages concept and development of healthy villages concept. • Adopt the National Campaign to introduce smoke free developments. • Recycling centres for all new developments. • Adequate insulation for all new developments. • Play areas for all new developments. 	A0045	<p>The contents of the submission are noted. <u>Some items raised go beyond the detail of a County Development Plan.</u></p> <p>The NPF and the RSES promote the provision of healthy communities. NPO26 in the NPF supports <i>“the objectives of public health policy including Healthy Ireland and the National Physical Activity Plan, though integrating such policies, where appropriate and at the applicable scale, with planning policy”</i>.</p> <p>A key principle set out in the RSES is <i>“Healthy Placemaking - To promote people’s quality of life through the creation of healthy and attractive places to live, work, visit, invest and study in.”</i> RPO 9.16 states that <i>“Local authorities shall support the objectives of public health policy including Healthy Ireland and the National Physical Activity Plan, through integrating such policies, where appropriate and at the applicable scale, with planning policies contained in development plans.”</i></p> <p>Having regard to the provisions of national and regional policy objectives, it is recommended that the Draft Plan seek to include policy objectives in relation to public health.</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
ii) Submission from the Environmental Health Department, Health Service Executive requests that the Plan incorporates of actions and strategies of the following: <ul style="list-style-type: none"> • Get Ireland Active – National Physical Activity Plan for Ireland. • Healthy Ireland – A Healthy Weight for Ireland. • The National Positive Ageing Strategy. 	A0054	The contents of the submission are noted and will be taken into consideration in the preparation of the Draft Plan.
iii) Submission recognises that planning policy needs to link with health policy.	A0151	The contents of the submission are noted and will be taken into consideration in the preparation of the Draft Plan.
Healthcare Facilities		
iv) Submission states that Loughlinstown hospital could be redeveloped into a full functioning hospital servicing north Wicklow, the new town of Cherrywood and the rest of DLR through the provision of better public transportation links.	A0034	The contents of the submission are noted. <u>The function of the existing Hospital is not a County Development Plan issue, rather it is under the remit of the HSE.</u>
v) Submission seeks the provision of a primary health care facility in Dún Laoghaire.	A0060	The content of the submission is noted. <u>The provision of new healthcare facilities is a matter for the HSE.</u> The Draft Plan will continue to support the provision of new facilities as required.
vi) Submission requests the provision of state of the art HSE facilities in Cherrywood in order to better cater for the health needs of the County.	A0133	The content of the submission is noted. The Cherrywood SDZ Planning Scheme is part of the County Development Plan, but it has a separate statutory process and cannot be amended by this process. <u>The provision of new healthcare facilities is a matter for the HSE.</u>
3.3.4 Community Facilities		
Leisure Services		
i) Submissions seeks to ensure that there are	A0005	The contents of the submissions are noted and will inform the Draft Plan preparation.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<p>adequate leisure facilities requests:</p> <ul style="list-style-type: none"> • New swimming pool facilities. • A range of new sport and leisure facilities in UCD. • New sports centres, MUGAs, playgrounds etc. particularly in the west side of the county. 	<p>A0011 A0074 A0083 A0097</p>	<p>Provision of facilities in UCD is a matter for the college authorities. In relation to new leisure and recreation facilities the Council are continually working to develop new facilities subject to funding. Samuel Becketts Phase 2 includes a new swimming pool.</p>
<p>ii) Submission requests that in addition to ensuring there are adequate community-run leisure facilities, steps should also be taken to ensure that privately owned and run leisure facilities are not priced out of areas.</p>	<p>A0074 A0097</p>	<p><u>This is not a County Development Plan issue.</u></p>
<p><i>Community Buildings / Space</i></p>		
<p>iii) Submissions seek an increase in the number of community centres / space being provided in order to cater for an increasing population. In this regard, submissions request:</p> <ul style="list-style-type: none"> • That community centres are made available for local residents, groups and associations. • That land is used more appropriately and efficiently for the benefit of the local community. • That investment is directed to places which will cater for the future needs of the people of the area. • That a permanent Scout Den for the 10th Kiltiernan Scouts Group is provided. • That a community civic centre is provided in 	<p>A0021 A0081 A0097 A0100 A0103 A0133 A0136</p>	<p>The contents of the submissions are noted.</p> <p>In order to achieve compact urban growth, national and regional policy objectives require the provision of appropriate supporting community and social infrastructure. In preparing the Draft Plan, it is recommended that consideration be given to the inclusion of a community audit requirement for new developments to be carried out by applicants in order to ensure that sufficient, appropriate, community and social infrastructure is available or can be made available to serve both new and existing communities.</p> <p>Policy SIC6: Community Facilities in the current Plan supports the provision of a wide range of community facilities throughout the County. In addition to the County Development Plan, a suite of Community Objectives and Actions are contained within the DLR Local Economic and Community Plan, 2016-2021 (LECP). Policy SIC1: The Local Economic and Community Plan in the current Plan, promotes and facilitates the delivery of the LECP. The Draft Plan will continue to support the LECP and the provision of community facilities across the County as</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<p>Dundrum Village.</p> <ul style="list-style-type: none"> • That public facilities are made available for young, old and the disabled. • That the needs of all users are considered at the early design stage. • That more funding is provided for community facilities, particularly in the Rathdown side of the County. • That community leisure sites are located in high density residential and commercial areas. • That more spaces for study, meeting rooms, community education and to access facilities are needed. • The there is a need to cater for the growing numbers of young people in the County 		<p>required.</p>
<p>iv) Submission from Airfield Estate seeks to collaborate with Dún Laoghaire-Rathdown to enhance and promote Airfield as an educational, social and cultural amenity in the County.</p>	<p>A0127</p>	<p>The contents of the submission are noted. It is recommended that policy objectives in the Draft Plan continue to support community, social and educational infrastructure throughout the County.</p>
<p>v) Submission incorporates recommendations for the forthcoming Community, Cultural and Civic Action plan for Dundrum.</p>	<p>A0151</p>	<p>The contents of the submission are noted. The provisions of the forthcoming Community, Cultural and Civic Action plan for Dundrum is not a County Development Plan issue, rather it is a local plan that will inform the Draft Dundrum Local Area Plan (LAP). The LAP is subject to its own statutory process and public consultation phase. The findings of this study will be considered when drafting County wide policy.</p>
<p>vi) Submission calls for planning for access to community services in order to strengthen our sense of active community.</p>	<p>A0097</p>	<p>The contents of the submission are noted and will be taken into consideration in the preparation of the Draft Plan.</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
vii) Submission states that steps should be taken to ensure that community facilities are not priced out of the area by private enterprise.	A0097	<u>This is not a County Development Plan matter.</u>
viii) Submission suggests that developers are obliged to provide suitable buildings for the public good. For example, this could include the provision of a community centre when building housing a community workshop/mill/dairy etc. for every office block, a GP or primary care practice for retail developments.	A0138	The contents of the submission are noted. In preparing the Draft Plan, consideration will be given to the inclusion of a community audit requirement for new developments in order to ensure that sufficient, appropriate, community and social infrastructure is available or can be made available to serve both new and existing communities.
3.4 Urban Design & Placemaking		
3.4.1 Urban Design		
i) Submissions seek to encourage high quality design and requests: <ul style="list-style-type: none"> • The use of attractive roof-top designs and materials leading to an irregular but pleasant impact on the skyline. • High quality design in all future developments on the UCD campus with student involvement. • The refurbishment and modernization of older academic buildings to provide additional building capacity on UCD campus. • That buildings suit their surroundings, noting that for example, urban or suburban designs are not suitable in rural locations. • That the County Development Plan retain the 	A0059 A0083 A0138 A0151	The contents of the submissions are noted. Both the NPF and the RSES contain policy objectives aimed at creating attractive, liveable, well designed, high quality urban places together with the regeneration of existing cities, towns and villages with enhances levels of amenity and design quality. The current Plan contains a suite of policies and guidance in Section 8.1 Urban Design, aimed at providing a high-quality design response in all new development and the public realm. Policy UD1: Urban Design Principles specifically promotes the guidance principles set out in both the 'Urban Design Manual – A Best Practice Guide' (2009), and in the 'Design Manual for Urban Roads and Streets' (2013) and requires consideration of context, amongst other criteria, in the any new development. With regard to UCD, design and use of buildings on campus is a matter for the college authorities as is the involvement of students at design stage. As with any proposed development, once lodged as a formal planning application, any third party may comment on

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<p>provisions of the 2009 Urban Design Manual.</p> <ul style="list-style-type: none"> That brownfield development must take into account neighbourhood context and how proposals interact with the urban realm. 		<p>said application. In accordance with national and regional policy objectives and planning guidance, it is recommended that the Draft Plan continue to ensure that the highest quality design is promoted throughout the County in all new development and public realm projects.</p>
3.4.2 Safer Living Environment		
<p>i) The submission seeks an increase in Garda presence in the community to deter anti-social behavior.</p>	<p>A0003 A0068</p>	<p>The contents of the submissions are noted. The provision of additional Gardai in the community is not a County Development Plan issue.</p> <p>Notwithstanding, the Joint Policing Committee and Local Policing Fora provide a forum for identifying and discussing appropriate responses to issues relating to public safety and policing. A 6 year Joint Policing Committee action plan has been developed and is being implemented: http://www.dlrcoco.ie/en/community/joint-policing-committee-local-policing-forums.</p> <p>Policy SIC4: Safer Living Environment in the current Plan facilitates the promotion and delivery of a safe living environment. It is recommended that this Policy be reviewed and updated in the Draft Plan.</p>
<p>ii) Submissions:</p> <ul style="list-style-type: none"> Recommend the provision of well-lit public areas and walking routes. State that lighting in many civic areas is a concern and acts a deterrent, keeping people away in the evenings and making empty urban spaces uninviting and off putting, particularly to older residents. 	<p>A0100 A0133</p>	<p>The content of this submission is noted. There is an ongoing upgrading programme with all street lights in DLR with new lanterns being LED. All lighting installations are designed to minimise obtrusive light while maximising the light reaching the footpaths and roads in the County.</p> <p>Policy SIC4: Safer Living Environment in the current Plan facilitates the promotion and delivery of a safe living environment and Policy UD3: Public Realm Design requires public lighting to be considered in new development. It is recommended that both Policies be reviewed and updated in the Draft Plan.</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
3.4.3 Universal Design		
<p>i) Submission from Head of Service Health and Wellbeing, Community Healthcare East suggests:</p> <ul style="list-style-type: none"> • That walkabouts of proposed developments are encouraged to see through the eyes of the community who have additional needs • New businesses should make their toilet facility available to those in need. • Consideration to have dedicated wheelchair parking spaces dual purpose, • Planning permissions granted should have a stipulation within that address's potential risks to members of our community to reduce slips, trips and falls which are potential risks to vulnerable members of society. 	A0045	<p>The content of the submission is noted. <u>This is an issue covered by the Building Regulations and not the planning code.</u> Notwithstanding, Policies ST4: Accessibility and SIC3: Universal Access in the current Plan promotes and supports access for all and universal design in all new development. Making mobility impaired parking spaces available for general use might lead to spaces not being available when needed by a mobility impaired individual.</p> <p><u>The use of facilities within businesses and walkabouts of developments is not a County Development Plan issue.</u> The DLR 'Petal Project', launched in June 2017, is an initiative whereby Council facilities and businesses display a petal logo on their window to signal that toilet facilities are available for use without fuss for older people in the County. The Dún Laoghaire-Rathdown Local Community Development Committee (DLR LCDC) commissioned walkability studies within the County to identify areas of concern.</p> <p>It is recommended that the Draft Plan continue to support and promote access for all and universal access.</p>
<p>ii) Submissions request:</p> <ul style="list-style-type: none"> • That accessible multiuse community facilities & spaces are encouraged in the County. • That new development goes beyond Part M of the building regulations and that DLR gives a commitment to universal design and accessibility in public spaces. • That specific requirements of persons with mobility issues are taken into account in terms of the layout of spaces and materials used on surfaces specifically with regard to: <ul style="list-style-type: none"> ○ Suitability of outdoor spaces 	A0053 A0074 A0097 A0138	<p>The content of these submission is noted. <u>This is an issue covered by the Building regulations and not the planning code.</u> Notwithstanding, policies ST4: Accessibility and SIC3: Universal Access in the current Plan promotes and supports access for all and universal design in all new development. Furthermore, Policy SIC2: Social Inclusion and Participation seeks to progressively reduce all forms of social exclusion across the County.</p> <p>The detailed design of the public buildings and outdoor space will comply with all relevant design standards while taking cognisance also of the requirements of all users of public space</p> <p>It is recommended that the Draft Plan will continue to support and promote social inclusion, access for all and universal access.</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<ul style="list-style-type: none"> ○ Footpaths ○ Furnished residents' common rooms ○ Suitability of accommodation for pets ● That all Council leisure facilities provide wheelchair accessible, blind accessible and autism spectrum disorder accessible equipment and spaces. ● The achievement of 'accessibility for all' and 'age-in-place' to be a top priority for the County. 		
iii) The submission seeks additional attention to be given to the development and maintenance of footpaths, traffic lights, tactile pavement.	A0103	<u>This is not a County Development Plan issue, rather it is an operational matter.</u>
3.4.4 Public Realm		
i) Submission requests that shared space design is not used by the County Council as a kerb instructs pedestrians to 'stay on the path'. In addition, paving should be maintained and mended as required.	A0052	The content of the submission is noted. Shared spaces have advantages and disadvantages and can be an appropriate response in some urban locations as well as on certain types of residential streets. The detailed design of the public realm will comply with all relevant design standards while taking cognisance also of the requirements of all users of public space.
ii) Submission seeks the active pursual of making urban areas "living spaces" through street landscaping which would: <ul style="list-style-type: none"> ● Re-invent streets providing walkability and cyclability solutions. ● Require re-consideration of pedestrian 	A0059	The content of the submission is noted. The current Plan contains a suite of policies and guidance in Section 8.1 Urban Design, aimed at providing a high-quality design response in all new development and the public realm. The Design Manual for Urban Roads and Streets, 2013 will inform design standards for urban areas in the preparation of the Draft Plan.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
facilities, street corridors and traffic flow and calming systems. <ul style="list-style-type: none"> • Necessitate more intensive street planting. 		
iii) Submission suggests the provision of seating/rest areas for all ages in retail and town centres.	A0100	The content of the submission is noted. Policy UD3: Public Realm Design in the current Plan requires that new developments consider street furniture, which would include seating, in their proposals.
iv) Submission request that DLR continue to lend its support to the 'Make Way Day Campaign'.	A0052 A0053	<u>Support for Make Way Day is not a County Development Plan issue.</u>

Section 4: Sustainable Travel and Transport

Key Issue	Sub. No.	Executive's Opinion & Recommendation
4.1 Sustainable Travel		
<p>i) Many submissions were received which refer to sustainable travel and both the need to support this generally and also with reference to specific projects which should unlock key sites and enable growth. Submissions:</p> <ul style="list-style-type: none"> • Considers that the Council should shift priority from car to pedestrians / cycling / public transport as a climate change priority. • Note the problem of congestion. • Recommend no new investment in roads and less road space to be given to cars. Instead Council should focus on filling in gaps in sustainable transport - cycling network. • Recommend that improved accessibility to public transport be a priority. • Recommend support for the BusConnects, MetroLink (all the way to Sandyford), Luas enhancements, Dublin Area Rapid Transit (DART) improvements and improved public transport connections between Dún Laoghaire and Dundrum. • Recommend electrification of all public transport and phasing out of Diesel public transport. • Recommend additional investments in more scenic, walkable, pedestrian-friendly streets. 	<p>A0009 A0023 A0026 A0046 A0050 A0053 A0078 A0074 A0082 A0097 A0100 A0129 A0132 A0146 A0144 A0151</p>	<p>The contents of these submissions are noted. The strategic transport policy approach recommended for the Draft Plan is to promote 'Avoid-Shift-Improve' which is based on avoiding the need to travel, shifting to more sustainable modes, thus improving energy efficiency. It is recommended that the Draft Plan continue to align with Smarter Travel: A New Transport Policy for Ireland 2009-2020 (Department of Transport 2012) and the Transport Strategy for the Greater Dublin Area (National Transport Authority 2016) which sets out the statutory policy framework for transport (reviews of both to begin in 2020). The Plan will also align with Project Ireland 2040 and the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Region (EMRA) which emphasise active and public transport and healthy placemaking.</p> <p>All Local Area Plans (LAPs) are being developed with sustainable transport as a key component. Developments seeking planning permission must demonstrate how they can promote a modal shift away from the private car and facilitate filtered permeability, with new cycle and pedestrian linkages maximised.</p> <p>Implementation of the Greater Dublin Area Cycle Network Plan, over time, will continue to be a key objective of the Council, with priority given to the development of the Primary Cycle Route network. The development of individual routes on the network is an operation matter. DLR's current road proposals are primarily for improved safety and improved facilities for pedestrians and cyclist. All road projects consider all modes (walking, cycling and, if appropriate, bus). The design of individual roads and the level of segregation of cycle lanes/paths is done on a case-by-case basis in accordance with Design Manual for Urban Roads and Streets (2019) and the National Cycle Manual.</p> <p>DLR supports DART improvements, BusConnects, Luas enhancements and Metrolink to Sandyford and further south to Cherrywood.</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
		<p>Phasing out Diesel powered public transport is a matter for the NTA (National Transport Authority) and beyond the remit of the County Development Plan. The NTA recently announced the planned phased deployment, starting in 2021, of “zero emission capability” diesel-electric hybrid buses.</p>
<p>ii) Submissions refer to the importance of compact growth which can address long commutes. Reference is made to and poor infrastructure, (specific reference to the Sandymount Business District).</p>	<p>A0013 A0077</p>	<p>The contents of these submissions are noted. Compact growth is a key objective of both the National Planning Framework (NPF) and RSES and it is recommended that the policy approach of the Draft Plan promote Land-use and transportation strategies at national, regional and County level that are designed to reduce long-distance commuting and support high-quality public transport.</p>
<p>iii) Submissions suggest that in terms of influencing carbon emissions the focus in the Draft Plan should be on reducing transport movements. It is submitted that reducing reliance on the private car will be critical in reducing carbon emissions. One submission refers to different needs for those who are not living proximate to public transport.</p>	<p>A0112 A0124 A0145</p>	<p>The contents of these submissions are noted and welcomed. The Climate Change Action Plan (CCAP) states that the transport sector accounted for 33.1% of greenhouse gases in 2016. Reducing transport movements is the first part of the Avoid-Shift-Improve principle of sustainable mobility which will be the fundamental basis of the Council's transport policy.</p> <p>With regard to wider transport measures across the County, the Council works with a range of stakeholders to improve sustainable transportation options in the Dublin Region. Key is the NTA, which, together with DLR and the other Dublin Local Authorities, has produced the Greater Dublin Area Transport Strategy 2016-2035. The study lays out a vision for transport in the Dublin Region and builds on the government's Smarter Travel - A Sustainable Transport Future initiative. The Council supports the NTA BusConnects Dublin programme which aims to improve public transport services, reduce commuting times for public transport users and provide over 200km of segregated cycling lanes in the Dublin Metropolitan Area.</p> <p>DLR has many existing policies that relate to the above and it is recommended that they be reviewed and updated in the Draft Plan. These include:</p> <ul style="list-style-type: none"> • Managing travel demand by ensuring land use and transport policies and practices are aligned as part of the planning process; • Planning and implementation of sustainable travel infrastructure including the

Key Issue	Sub. No.	Executive's Opinion & Recommendation
		<p>development of improved walking and cycling routes, enhanced public realm areas, and facilitating the expansion of the electric vehicle (EV) charge point network; and</p> <ul style="list-style-type: none"> • Introduction of bike share and car clubs. <p>Regarding the Council's own travel patterns, the CCAP includes a range of transport actions addressing fleet operations, planning and public realm, active travel and behavioural change, and public transport.</p>
iv) Submission suggest that there is a need for investment in sustainable transport infrastructure for schools and that the plan should contain a policy relating to same.	A0024	The contents of this submission are noted and will inform the preparation of the Draft Plan. Accessibility is a key issue when dealing with proposals for new schools. No additional policy objective is recommended.
v) Submissions raises concerns regarding the environmental impact of the removal of trees, hedges and stone wall resulting from BusConnects. Particular reference is made to Shankill.	A0050 A0072	<p>The submissions are noted. The Core Bus Corridors are subject to a second phase of public consultation and there are specific changes in Shankill. The detailed design of the corridors in the County are a matter for a separate public consultation and approval process.</p> <p><u>This is not a County Development Plan issue.</u></p>
vi) Submission by the TII discourages the zoning of land proximate to junctions on the national road network where such development would generate significant additional traffic which could potentially compromise the capacity and efficiency of the national roads. The cost of any mitigation measures arising to the national road network (land, infrastructure or environmental mitigation) will not be funded by the TII.	A0062	<p>The contents of this submission are noted. However, national and regional policy requires development along high-capacity public transport routes, both existing (e.g. Luas) and planned (e.g. Core Bus Corridors). Many of these locations (Sandyford Business District, the Cherrywood Strategic Development Zone, Carrickmines) which are well served by public transport are also proximate to National Roads (M50, N11 and N31). It is essential that these lands continue to be developed. Development on these lands will be catered for by having access to high-quality, high-capacity public transport, not by unsustainable capacity enhancements (i.e. road widening). The operational efficiency of the M50 could be improved by introducing variable speed limits, better incident detection and demand management. Such measures would protect the national function of the roads. It is recommended that the Draft Plan includes a policy objective supporting such measures on the M50.</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
vii) Submission from the Department of Transport, Tourism and Sport (DTTaS) agrees with the Issues Paper in the use of Avoid-Shift-Improve and recommends that sustainable mobility elements of the County Development Plan should align with Project Ireland 2040 and the NTA's Transport Strategy for the Greater Dublin Area (GDA).	A0087	The contents of this submission are noted. Support for the Avoid-Shift-Improve principle is welcomed. It is recommended that the policy objectives in the Draft Plan align with Project Ireland 2040 and continue to align with the NTA's Transport Strategy for the Greater Dublin Area 2016-2035 and its subsequent revisions.
viii) Submission from Fáilte Ireland requests that priority be given to the provision of a wider range of targeted public transport options for tourists wishing to travel from urban areas to rural based tourist attractions e.g. Dublin Mountains and in addition, enhance walking and cycling routes as a key resource to opening up natural assets.	A0101	The contents of this submission are noted. While DLR does not have a role in the provision of public transport it would support the aspirations of this submission. DLR is part of the Dublin Mountain Partnership (DMP) and in many instances provide the infrastructure on which the service operates. The long-term strategy is to manage recreation in the Dublin Mountains on a more sustainable basis. A number of initiatives have been carried out by the DMP including the provision of new and upgraded trails, improved signage and the preparation of a custom DMP map. It is recommended that policy in the Draft Plan continue to support the work of the Dublin Mountains Partnership.
ix) The submission from An Taisce requests DLR to: <ul style="list-style-type: none"> • Encourage a shift from car-orientated urban patterns to walkable, cyclable, and transit-orientated development patterns. • Promote physical activity to promote health. • Discourage the loss of front gardens for car parking. • Prepare a local transport plan alongside the County Development Plan setting out how the objectives of the national Smarter Travel policy will be achieved locally and translated into measurable action. 	A0065	The contents of this submission are noted. It is recommended that the Draft Plan continue to align with Smarter Travel and the Transport Strategy for the Greater Dublin Area 2016-2035 which sets out a statutory framework for transport (reviews of both to begin in 2020), also aligns with Project Ireland 2040 and the RSES which emphasise active and public transport and healthy placemaking.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<p>x) Submission from University College Dublin (UCD) Students which outlines their strategic sustainable transport vision and makes recommends the following:</p> <ul style="list-style-type: none"> • Prioritisation of high-quality walking and cycling infrastructure and facilities into and within the UCD Belfield Campus. • Rejection of the Metrolink to UCD, as buses are a better fit for the County. • Support for BusConnects Core Bus Corridor. • Carrying out of a study, in conjunction with the NTA, to identify locations for park and ride facilities within the County. • Carrying out a feasibility study for the provision of a public transport link along the Dublin Eastern Bypass (DEBP) reservation between the M50 at Sandyford and the UCD Campus. • Policies to discourage and limit unsustainable car-based commuting to UCD (14,00 vehicles per day), by requiring a gradual reduction in car parking spaces in developments over time, and by applying an appropriate charge or other restrictions. 	<p>A0083</p>	<p>The contents of this submission are noted. The strategic transport and mobility objective for the County will be following the Avoid- Shift-Improve approach. This puts a strong emphasis on active and public transport modes.</p> <p>DLR also supports the implementation of the Greater Dublin Area Cycle Network Plan. A substantial length of the primary cycle routes will be delivered as part of the BusConnects. There is no current proposal to bring a metro to UCD. The reference to the underground metro to UCD was removed from the final RSES. It is recommended that the Draft Plan support the principal of BusConnects Core Bus Corridor proposals and the NTA's plan to have it in place by 2027. However, the Core Bus Corridors are subject to a second phase of public consultation. The detailed design of the corridors in the County are a matter for a separate public consultation and approvals process. BusConnects proposals includes making UCD an important interchange/hub on the bus network.</p> <p>The requirement for the long-term protection of the DEBP is a strategic requirement, as set out in the RSES and NTA Transport Strategy of the GDA 2016-2035. SLO 6 allows for a temporary public transport link pending a decision of the TII/Central Government in relation to the future status of the Bypass. The 'BlueLine' BRT (Bus Rapid Transit) has been superseded by BusConnects route no 13 and 14 of the Core Corridor Project and there is no longer a proposal to route a BRT along the DEBP. It is recommended that Specific Local Objective (SLO) 6 be reviewed and updated in the Draft Plan.</p> <p>Another aspect of BusConnects proposals is the creation of network of strategic bus-based Park and Ride facilities at key locations along the radial road network. DLR will continue to work with UCD on an ongoing basis on the area of sustainable travel and the development management process examines the reduction of carparking on an ongoing basis.</p>
<p>xi) Submission recommends an increase in parking fees (over reducing public transport fees) and that congestion, environmental and maintenance</p>	<p>A0143</p>	<p>The contents of this submission are noted. <u>The setting of parking fees on street in an operational matter and is outside the remit of the County Development Plan.</u></p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
charges, should be introduced to nudge people towards sustainable forms of transport.		<u>This is not a County Development Plan issue.</u>
xii) Submission calls for improvements to the inter-connection of sustainable transport systems, simplified ticketing and for the provision of signage indicating alternative routes and walking times.	A0145	The contents of this submission are noted. A key aspect of the NTA's BusConnects proposals is better interchanges between various forms of public transport. BusConnects also proposes a 90-minute fare that will allow a customer to use any combination of bus, DART and Luas for a journey, subject to the last leg commencing within 90 minutes of the start of the overall trip. It is recommended that the Draft Plan support these BusConnects proposals.
4.1.1 Integration of Land Use and Transport		
i) Various submissions including one from the Department of Transport, Tourism and Sport (DTTas) and Transport Infrastructure Ireland (TII) welcomes the recognition throughout the Issues Paper of the importance of aligning land use and transport policies. Compact growth should be promoted along with better transport links between the various areas of the County.	A0002 A0026 A0062 A0087 A0112 A0124 A0142 A0143	The contents of these submissions are welcomed. It is recommended that the Draft Plan continues to support compact growth and retains policy objectives which require high density developments adjacent to good quality public transport along with good permeability links.
ii) Submission queries the function of the transport strategy and suggests that this should follow regional and county level plans to ensure that the transport needs of communities are met. Submission raised issues regarding the need to upgrade roads.	A0055	The contents of this submission are noted. It is recommended that the Draft Plan align with Smarter Travel and the Transport Strategy for the GDA 2016-2035 which sets out a statutory framework for transport (reviews of both to begin in 2020), and with Project Ireland 2040 and the RSES which emphasise active and public transport and healthy placemaking. The Draft Plan will include a roads programme that will be subject to the availability of funding.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
4.2 Walking & Cycling		
4.2.1 Cycle Links and Infrastructure		
<p>i) Submissions relate to cycling as follows:</p> <ul style="list-style-type: none"> • Need for enhanced and expanded cycle facilities, including cycle parking, removing parked cars from roads, improved surfaces and maintenance plans. • Cycle paths can only be safe on new roads. • Need for development of off-road cycle facilities which should be child friendly. • Need to support the National Cycle Network & the Greater Dublin Cycle Network. • Need to provide cycle routes in specific areas, including: <ul style="list-style-type: none"> ○ Stepside; ○ Sandyford; ○ IADT (Institute of Art Design and Technology) and Dún Laoghaire; ○ East-west across N11; ○ Dodder; ○ Newtownpark Avenue; ○ Carysfort Avenue; ○ Kill Lane; and, ○ Adjacent to the Luas. 	<p>A0008 A0009 A0014 A0015 A0026 A0067 A0077 A0097 A0100 A0118 A0131 A0132 A0141</p>	<p>The contents of these submissions are noted. The Planning Authority agrees that cycle infrastructure should be further prioritized. All Council cycle infrastructure is designed in accordance with the National Cycle Design Manual. The NTA's Cycle Network Plan for the Greater Dublin Area will be reviewed during the life of the next County Development Plan and will be the basis for additional cycle links. The Council has high standards for bicycle parking, which is endorsed by the NTA (see their submission A0149). The Core Bus Corridor Proposals, when implemented, will provide more high-quality cycle infrastructure and will improve the surface of an extensive length of the cycle network. The Council continues to work with the NTA on the locations for new and upgraded cycle infrastructure. The Council is working with the NTA on possible locations for 'light segregation' including some of the routes proposed in the submission.</p> <p>The Dodder Greenway is being designed jointly by Dublin City Council and DLR. It will be subject to public consultation in 2020 when these design issues will be decided.</p> <p>Improved maintenance is being dealt with through the Council's operational programmes. Luas uses a relatively narrow corridor and the possibility of running a continuous pedestrian/cycle route adjacent to it is small. However, there are a number of locations where short lengths of ped/cycle routes adjacent to Luas could be considered. These however could involve land acquisition. In the Ballyogan Stepside area a is greenway connecting Cruagh Wood with Ballyogan Road/Luas is under construction. Further improvements to the pedestrian/cycle network will be provided as part of the Clay Farm development.</p> <p>It is recommended that the Draft Plan review and update policies to improve cycle infrastructure throughout the County, including the upgrade of existing low-quality cycle infrastructure (ST5 and ST7).</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
ii) Submissions: <ul style="list-style-type: none"> Recommend that a cycle strategy be prepared to include the cycle routes shown in the Greater Dublin Cycle Network. Refer to the need for a table of cycle routes. Request improved information available on cycle lanes Request a policy to provide a certain quantity of cycle lanes during the life time of the County Development Plan, including the delivery of the Dodder cycle route. 	A0008 A0014 A0015 A0024 A0031 A0083 A0086 A0097 A0141	<p>The contents of these submission are noted and will inform the preparation of the Draft Plan. The NTA's Cycle Network Plan for the Greater Dublin Area, will be reviewed during the lifetime of the County Development Plan is the basis for cycle routes in the County. Cycle touring routes or greenways will be considered. The NTA's Cycle Network Plan for the Greater Dublin Area will be reviewed during the life of the new County Development Plan.</p> <p>The Dodder Greenway is being designed by Dublin City Council and DLR. It will be subject to public consultation in 2020 when design issues will be decided which will align with DLR cycle policy.</p>
iii) Several submissions, including one from Bord Fáilte, refer to the East Coast cycle trail/Dublin Bay trail/S2S/ with a high level of support for the project. Some submissions favour the routing on public land rather than private land or residential areas and specifically refer to Shankill. Some submissions favour the route following the coast as closely as possible.	A0026 A0036 A0086 A0097 A0101	<p>The contents of the submissions are noted. In collaboration with Fáilte Ireland it is planned that a new Dublin Coastal Trail will be developed. Decisions on exact design and routings will be subject to EIA (Environmental Impact Assessment), public consultation and a separate approvals process. The section of the East Coast Trail between the city boundary and Dún Laoghaire is currently under review and will be designed in accordance with the National Cycle Design Manual. It is recommended that policy on same be reviewed and updated in the Draft Plan.</p>
iv) Submissions refer to the need to provide cycle lanes without the loss of trees and also require tree planting along cycle routes to tackle air pollution while others refer to pollinator friendly planting.	A0056 A0100	<p>The contents of these submissions are noted and are considered to be a design and operational issue.</p> <p><u>This is not a County Development Plan issue.</u></p>
v) Submissions: <ul style="list-style-type: none"> Refer to the need to make cycling and walking safer for children. 	A0053 A0056	<p>The contents of these submissions are noted. Modal shift to active modes (walking and cycling) accords with existing national, regional and current Plan policy and it is recommended that they continue to be encouraged in the Draft Plan.</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<ul style="list-style-type: none"> Recommend segregated cycling facilities. Consider some roads with cycle facilities are not safe e.g. Monkstown Avenue. Recommend routes which would be suitable to accommodate cycling. Refer to the establishment of various cycle and walking programmes for children. 	A0097 A0100 A0132	<p>The Council with the NTA and An Taisce continues to support safe cycle and walking schemes near schools. The National Cycle Manual sets guidelines for when cycle lanes should be segregated that DLR aims to adhere to. It is agreed that measures such as cycle buses should be encouraged, subject to the implementation of a safe system of operation at individual schools. The proposal to establish a pilot programme for 'school streets' while not a County Development Plan issue is likely to be examined by the Strategic Policy Committee (SPC) for Transport and the Marine. <u>The individual design of an existing cycle lane is not a County Development Plan issue but an operational design issue for transport.</u></p> <p><u>The operational elements of these submissions are not County Development Plan issues.</u></p>
vi) Several submissions refer to how the design of cycle facilities should be modified, and Dutch standards adopted.	A0014 A0074 A0077 A0097	<p>The contents of these submissions are noted. <u>This is not a County Development Plan issue.</u> All Council cycle infrastructure is designed in accordance with the National Cycle Design Manual. The NTA's National Cycle Design Manual is based on best international standards, including Danish and Dutch standards. Different designs are used for commuter cycle routes and greenways (i.e. lower-speed leisure routes where walking and cycling co-exist).</p>
vii) Submission relates specifically to Barnhill Road cycle Lane.	A0092	<p>The contents of this submission are noted. The development of individual routes on the network is an operation matter. <u>This is not a County Development Plan issue.</u></p>
viii) Submission recommends the regular removal of leaves by the Council.	A0097	<p>The contents of this submission are noted. <u>This is not a County Development Plan issue.</u> This is a roads maintenance issue.</p>
ix) Submission calls for additional space to be provided for the expansion of the existing Dublin Bikes scheme. The Council should appoint a dedicated cycling official.	A0097 A0100	<p>The contents of these submissions are noted. The current Plan policy on a pilot public bike scheme was carried out by Bleeperbikes, commencing in November 2017 with 50 bikes deployed at 12 locations, accessed via a mobile phone. While this scheme is no longer operational in the County, it is hoped that this type of service can be provided in the future subject to the agreement with an operator.</p> <p>It is recommended that Policy ST8: Public Bike Facilities be reviewed and updated in the Draft Plan.</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
x) Submission suggests the provision of e-bike chargers.	A0100	The contents of this submission are noted. In 2019 the Council purchased two Smart Benches, and these are located in Dún Laoghaire and Sandyford. These have the facilities and equipment to pump a bike, maintain a bike using tools, and a facility to charge a phone. There is also a facility to plug in a socket thus allowing a e-bike to be charged. The provision of e-bike charging is an operational matter. It is recommended that policy in the Draft Plan will support the extension of e-bike chargers, subject to the availability of funding.
xi) The submission requests: <ul style="list-style-type: none"> • Support for traffic free cycleways and off-road trails. • Appropriately signpost and waymarking walking and cycle routes during the lifetime of the Plan. • Maintenance of walking and cycling routes public footpaths 	A0014	The contents of this submission are noted. The NTA's Cycle Network Plan for the Greater Dublin Area is the basis for cycle routes in the county. It will be reviewed during the lifetime of the County Development Plan. Cycle touring routes or greenways are part of the strategy. All cycle routes in the County will be designed in accordance with the National Cycle Design Manual. DLR would support the provision of high quality appropriately designed signage. The maintenance of footpaths and cycle paths is dealt with as part of the Council's operational programmes. The existing policies in the current Plan support the issues raised.
xii) The submission refers to amending the contents of ST5: Walking and Cycling and Policy ST7: The County Cycle Network of the current County Development Plan.	A0014	The contents of the submission are noted. It is recommended that the wording of policy ST5 and ST7 of the current Plan be reviewed and updated in the preparation of the Draft Plan
4.2.2 Pedestrian links and facilities		
i) Submissions calls for better facilities for pedestrians including improvements to footpaths and lighting and priority movement for pedestrians and cyclists.	A0009 A0131	The contents of these submissions are noted. It is recommended that the Draft Plan continue to identify the Design Manual for Urban Roads and Streets (DMURS) (2019) as the appropriate design standard for urban areas.
ii) Submissions request that DLR consider a number of ways that pedestrian facilities can be improved. (Specific reference to Dundrum and Goatstown).	A0053 A0074	The contents of these submissions are noted. It is considered that these issues relate to the detailed design routes. <u>This is not a County Development Plan issue.</u>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
iii) Submission states that a New Pastoral Centre proposed by Dalkey Parish would remove one of the few opportunities left to improve permeability in the Village.	A0092	The content of the submission is noted. <u>This is not a County Development Plan issue.</u>
iv) Submissions recommend moving towards the pedestrianisation of various locations - Dundrum Main Street, Georges Street in Dún Laoghaire and Blackrock Main Street are also recommended.	A0097 A0100 A0131 A0143 A0132	The contents of these submission are noted. <u>This is not a County Development Plan issue.</u> Pedestrianisation requires consideration of servicing, public transport, cyclists, and utilities and would be subject to a separate public consultation and approvals process. The specific areas will be considered under the review of the relevant local area plans for these areas rather than in the Draft Plan.
v) Submissions states that well-lit walkways and lanes with good signage should be put through residential and commercial areas and where laneways already exist, efforts should be made to make them safer with increased lighting.	A0014 A0097	The contents of this submission are noted. All major developments are assessed with regard to improved pedestrian and cycle permeability. While signage can help wayfinding, especially for visitors, it can also detract from the urban realm and will be considered on a case-by-case basis. The issues raised are supported by Policy ST6 in the current Plan. <u>It is recommended that policy ST6 is retained in the Draft Plan.</u>
4.3 Public Transportation		
4.3.1 Bus		
i) Submissions: <ul style="list-style-type: none"> Seek improvements to the bus service and network and better connections between the bus, DART service and Expressway services along the N11. Request more interchanges. Request no changes to No. 16 bus route. Circle line from UCD-St-Vincent's- DART. Shuttle bus link between the Dún Laoghaire and IADT. 	A0003 A0007 A0012 A0031 A0042 A0069 A0146 A0151	The contents of these submission are noted. <u>Many of the issues raised are not County Development Plan issues.</u> The design of the public transport services and new routes are matters for the regulator (i.e. the NTA). A key component of the BusConnects proposals is improved interchange between all modes of public transport. Feeder Buses exclusively for the DART are not part of the NTA BusConnects proposals and not something that NTA are considering. A private shuttle service has been in operation between Sydney Parade and UCD. When planning for the maternity hospital was being discussed it was stated that it might be possible to also provide a stop at St. Vincent's Hospital. The proposed '90 minute' fare proposal in BusConnects will make interchange more attractive and will eliminate multiple fares for the majority of commuters.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<ul style="list-style-type: none"> Request additional frequent service/bus corridors in Stepside area. Request reduction of bus traffic on Main Street Dundrum and proposes an alternative and detailed plan for bus traffic management. 		<p>DLR, in conjunction with NTA, will be carrying out an Area Based Transport Assessment (ABTA) as part of the LAP process for Dundrum. All options will be considered.</p> <p>It is recommended that the Draft Plan have a suite of policies which support improvement to the bus service including BusConnects.</p>
<p>ii) Submissions refer to BusConnects as follows:</p> <ul style="list-style-type: none"> Strong support for the implementation of BusConnects and in particular the delivery of segregated cycling and bus routes. Concerns raised with regard to the environmental impact of removal of trees, hedges and stone wall. Particular reference is made to Shankill. Concerns that large portions of Glasthule, Glenageary, Killiney and Dalkey will have a lesser service. 	<p>A0026 A0050 A0072 A0083 A0092</p>	<p>The contents of these submissions are noted. <u>The detailed design of the Core bus corridors not a County Development Plan issue, rather it is a matter of a separate statutory process.</u></p> <p>It is recommended that the Draft Plan have a suite of policies which support improvement to the bus service including BusConnects.</p>
<p>iii) Submission seeks the expansion of local link bus service.</p>	<p>A0053</p>	<p>The contents of this submission are noted. <u>This is not a County Development Plan issue.</u> The provision of the local bus link service is a matter for the Regulator (i.e. the NTA).</p>
<p>iv) Submission states that the public transport provision should include clearer ambition on the Blueline Bus Rapid Transport Corridor.</p>	<p>A0064</p>	<p>The contents of this submission are noted. The Blueline proposal is not part of the NTA's Strategy for the Greater Dublin Area which the County Development Plan is required to accord with.</p>
<p>4.3.2 DART</p>		
<p>i) Submissions seeks the upgrade of the DART and the use of acoustic barriers along certain sections of the DART line to be examined.</p>	<p>A0012 A0026</p>	<p>The contents of these submissions are noted. The NTAs Implementation Plan 2019 - includes the DART Expansion programme, network development, station and other enhancements.</p> <p>It is recommended that the Draft Plan support the NTA's Implementation Plan 2019-2024.</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
4.3.3 Luas		
i) A number of submissions seek extensions to the Luas lines, namely: <ul style="list-style-type: none"> • Dundrum to Blackrock. • Cherrywood to Dún Laoghaire and the Airport. • Extend green line to Loughlinstown hospital. • Luas Green Line extension to Old Connaught and Bray. 	A0002 A0034 A0049 A0120	The contents of these submissions are noted. It is recommended that the Draft Plan include policies which are consistent with the NTA's Strategy for the Greater Dublin Area and NTAs Implementation Plan 2019-2020. These documents promote the Luas extension to Bray including a stop to the rear of Loughlinstown Hospital and this extension will also serve Old Connaught. The other proposals in the submission are not consistent with NTA policy. Improved pedestrian and cycle links between Loughlinstown hospital and Cherrywood will be considered for inclusion in the Draft Plan.
ii) Submissions requests improvements to the Luas including the problem of Luas congestion is addressed. Some refer to the need for Luas upgrade to metro. Issues raised regarding traffic and roads in Stepside considering population increase and recently granted planning permissions.	A0002 A0005 A0026 A0067 A0069 A0082 A0118	The contents of these submissions are noted. The NTA has commissioned more and longer trams for the Green Line which will increase capacity significantly. Sustainable transport links are being developed that links Stepside with areas to the north. A greenway connecting Cruagh Wood with Ballyogan Road/Luas is under construction. Further improvements to the pedestrian/cycle network will be provided as part of the Clay Farm development. Phase 1 of the Blackglan Road/Harold's Grange Road Improvement Scheme is a committed scheme in DLR's 2020-2022 Programme of Capital Projects and will facilitate major improvements to both Blackglan Road and the busy Lambs Cross junction".
iii) TII is in the process of finalising Technical Guidelines for Development Light Rail Environment which would be useful for the planning authority to use in terms of the Luas and development planning interface.	A0062	The contents of this submissions are noted. The Council will consider the guidelines when they are published.
4.3.4 Public Transportation - General		
i) Submissions consider that it is essential that a good integrated public transport system is in place. Particular reference is made to:	A0025 A0068 A0103	The contents of these submissions are noted. The importance of integrated public transport is recognised by the Planning Authority. Policy ST11 of the current Plan sets out the policy approach to Public Transport improvement. These will all be in line with Smarter Travel and

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<ul style="list-style-type: none"> The need to work more closely with Wicklow County Council on sustainable travel. Need for an improved public transport/ bus and Luas service for Dundrum. Need for East-west transportation infrastructure. 	A0136 A0137	<p>NTAs Transport Strategy for the Greater Dublin Area.</p> <p>The Bray and Environs Transport Study (NTA, DLR, WCC, TII) underpins how development in the border area between DLR & Wicklow is to be advanced. The study highlights infrastructure and services that would be mutually beneficial to permitting development in both Counties.</p> <p>It is recommended that policy supporting this study be included in the Draft Plan.</p>
<p>ii) Submissions seeks more frequent, reliable and better value public transport with reference to Stillorgan, Stepaside and Cherrywood.</p>	A0027 A0050 A0056 A0067 A0081 A0118	<p>The contents of these submissions are noted. While not a County Development Plan issue, the proposed '90 minute' fare proposal in BusConnects will make interchange more attractive and will eliminate multiple fares for the majority of commuters.</p>
<p>iii) Submission would welcome proposals to bring improved public transport - bus and Luas services to the Old Connaught area.</p>	A0049	<p>Development in Old Connaught will require improvements to public transport. Given the scale of residential development proposed in the area over the next number of years, however, it is imperative that, in conjunction with the NTA and other public transport operators, the Old Connaught LAP sets down clear parameters in terms of the delivery of a sustainable public transport network – the evolution and scale of which would expand commensurate to the phased incremental growth of the 'new' community of Old Connaught</p> <p>While the extension of the Luas Green Line from Bride's Glen to Bray is embedded in both the NTA's 'Transport Strategy for the greater Dublin Area 2016-2035' and the more recent National Development Plan (NDP) both documents anticipate delivery of the extension post-2027. In the interim period to 2027, however, it follows that public transport provision in the developing area of Old Connaught will essentially be bus based. While the NTA's BusConnects project is still to be finalised Route 13, which connects Bray to Dublin City Centre has been identified as a Core Bus Corridor which, when operational, will see increased service frequencies and significantly reduced journey times along that route. A key bus stop on Route 13 is located at the Old Connaught Avenue/Dublin Road junction – only 600 metres from the</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
		eastern edge of the Old Connaught LAP boundary. It is recommended that the Draft Plan support plans for both BusConnects and the Luas extension to Bray.
iv) Submissions requests that DLR consider an increase in park and ride facilities combined with cycle parking be provided or considered in various locations including new and existing public transport hubs.	A0050 A0055 A0056 A0072	The contents of these submissions are noted. The Planning Authority will support the NTA's proposals for strategic park and ride at suitable locations. Bicycle parking is being provided by the Council on an on-going basis, including at public transport stops and is also part of the BusConnects proposals. It is recommended that Policy ST17 will be retained and revised as appropriate to reflect NTA proposals.
4.4 Roads		
4.4.1 National Roads /Strategic Issues		
i) Submission from TII regarding the strategic capacity and safety of the national roads network and associated junctions with specific reference to the M50, M/N11 and N31 and additional connectivity to national roads.	A0062	The contents of this submission are noted. The road projects for the County will take the requirements of TII into account and be in accordance with national policy and the RSES.
ii) Various submissions on the N11/M11 Junction 4 to Junction 14 Improvement scheme.	A0049 A0062 A0072	The contents of these submission are noted. The N11/M11 Junction 4 to Junction 14 Improvement scheme is a Project Ireland 2040 and RSES priority and is currently at pre-appraisal/early planning which is subject to a separate statutory process. When the reservation for the M11/N11 is known its reservation can also be protected in the County Development Plan maps. It is recommended that the Draft Plan will include support for this project subject to the outcome of environmental assessment (SEA, EIA and AA), flood risk assessment and the planning process.
iii) Submissions relate to the Eastern Bypass scheme. Submission from An Taisce recommends that the Eastern Bypass reservation should be removed from the County Development Plan. TII	A0062 A0065	The contents of these submissions are noted. The requirement for the long-term protection of the DEBP is a strategic requirement, as set out in the RSES and NTA Transport Strategy of the GDA 2016-2035 and is reflected in the current Plan. The continued protection of the DEBP reservation is recommended in the Draft Plan.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
recommends its retention.		
iv) Submission by the TII consider that the carrying out of traffic and transport assessment at application stage is not a substitute for a prior overall transport assessment at Plan stage to protect the strategic function of the national road network.	A0062	The contents of this submission are noted. The Planning Authority considers that it shouldn't be necessary to do an overall transport assessment for the County Development Plan. The Eastern Regional Model, which covers the greater Dublin area, has been developed to assess future scenarios with various levels of development and various levels of infrastructure in place. The major pieces of infrastructure are being provided by NTA or TII. At LAP level development is usually linked to the delivery of the pieces of infrastructure. ABTAs (Area Based Transport Assessments) in conjunction with NTA will be carried out as part of the LAP process.
v) Submission of TII considers that there is a need to consider reviewing existing development plan polices related to local roads adjacent to national roads as set out in the 2012 Guidance, the RSES and the NTA's Transport Strategy for the GDA.	A0062	The contents of this submission are noted. Policy ST26 of the current Plan refers to the Council taking account of these Guidelines. The need to protect capacity of the national road network can sometimes conflict with the need to provide for development, particularly housing. It is recommended that Policy ST26 be reviewed and updated in the preparation of the Draft Plan.
4.4.2 Local Roads		
i) The submission states that road drainage is quite poor near their dwelling (location is not stated).	A0003	The contents of this submission are noted. <u>This is not a County Development Plan issue, rather it is a roads maintenance issue.</u>
ii) In relation to the delivery of new road infrastructure submissions: <ul style="list-style-type: none"> • Express concern in relation to the lengthy time frames. • Notes the importance of all infrastructural works that would support future development with reference to Kiltiernan (Glenamuck Distributor Roads Scheme). • Recommend that Blackglenn Road begin at 	A0068 A0088 A0015 A0122	The contents of these submissions are noted. The Glenamuck District Distributor has planning approval and DLR are currently preparing tender documents for its construction. The Blackglenn Road Improvement Scheme does not widen the actual road. The main improvements are safety and the provision of pedestrian and cycle facilities. Some additional capacity will be provided at Lambs Cross which is part of the project to be constructed in first phase. It is recommended that Draft Plan will include various roads in the Six Year Road Objectives Table. The timing and delivery of these projects is all subject to the availability of resources.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<p>Lambs Cross to relieve congestion.</p> <ul style="list-style-type: none"> Request Hillcrest Road be widened. 		
<p>iii) Submission states that both the Dundrum Bypass and the roads at Beacon Hospital are prone to accidents and calls for efforts to be made to improve safety on these roads.</p>	A0097	<p>The contents of this submission are noted. <u>This is not a County Development Plan issue, rather it is an operational matter.</u></p>
<p>iv) Submission suggests that the County Development Plan must address the upgrading of the Brennanstown Road to enable development of zoned lands.</p>	A0122	<p>The contents of this submission are noted. A Part 8 Planning application, for Brennanstown Road, to cater for development in that area was not approved by Council. However, transport measures from the Part 8 were conditioned in development that was subsequently permitted by An Bord Pleanála in various Strategic Housing Development (SHD) planning applications. This issue will be considered in the preparation of the Draft Plan.</p>
<p>v) Submission requests that DLR correct the route of the Six-Year Road Objectives from The Park, to Ballyogan Road reflecting the permitted IPUT development in all maps under Reg. Ref: D18A/0257.</p>	A0142	<p>The contents of this submission are noted and will be taken into consideration in the preparation of the Draft Plan.</p>
<p>vi) Submissions refer to deficiencies in the road network of Old Connaught and Bray environs and the need for the timely preparation of the LAP.</p>	A0088 A0049	<p>The contents of these submission are noted. An ABTA is ongoing which will feed into the Draft Local Area Plan as will the NTA's Bray and Environs Study. The roads will be subject to detailed design and consultation which will take into consideration environmental assessment (SEA, EIA and AA), flood risk assessment and the planning process. It is recommended that the requirement to prepare a LAP for Old Connaught will be retained in the Draft Plan.</p>
<p>vii) A detailed submission on Dalkey calling for a traffic management and transport plan including some road widening. Recommendation made for a one-way system between Dalkey Village and Seapoint.</p>	A0092	<p>The contents of this submission are noted. The issues raised are at a detail beyond the scope of the County Development Plan. With regard to individual planning applications, when they are assessed, consideration is given to road safety and traffic and the provision of changes to the road layout. The issue of traffic and road safety is covered in the current Plan in policy ST27.</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
		<p>The level of detail raised with regards to Dalkey <u>is not a County Development Plan issue.</u></p> <p>Regarding the generality of the issues raised, it is recommended that the Draft Plan, will contain a similar policy to ST27 and review and retain a suite of policies on, walking, cycling and buses and improving the public realm.</p>
viii) Submission proposal for an inter-county link between DLR and South Dublin County Council (SDCC) modifying and extending the Southern Cross Route (College Road section) to the county boundary and from there in a westerly direction to serve 'Edmondstown Lands' and are zoned for Residential Development and capable of delivering a significant quantum of residential dwellings and associated neighbourhood facilities, as provided for in the South Dublin County Development Plan (Variation No 4).	A0096	<p>The contents of this submission are noted. The lands to be developed are located in South Dublin County Council. These lands are bounded to the north by Edmondstown Golf Club with very little opportunity for permeability links in that direction. There is a very narrow corridor on the section of College Road north of the M50 which would make it very difficult to provide a cycle route on College Road. Grange Golf Club and Marlay Park would be the affected properties if land acquisition was required. A cycle route on College Road is not part of the NTA's current cycle network plan. DLR has plans to upgrade both Harold's Grange Road and Blackglen Road. Support for this proposal is not recommended at present.</p>
ix) Submission calls for the streets that are key but neglected arteries between the Dún Laoghaire seafront and town centre to be prioritised for improvement within the County Development Plan especially with the imminent reopening of the Baths.	A0133	<p>The contents of this submission are noted. Improvements to the public realm are on-going. Considerable progress has been made over recent years in reconnecting Dún Laoghaire seafront to the town centre. Examples include the Metals project and ongoing work along Marine Road and Haigh Terrace. This will be further strengthened by the new pedestrian link between Crofton Road and Sussex Street as part of the redevelopment of the former Schoolhouse site on Eblana Avenue and as supported by the current Dún Laoghaire Urban Framework Plan (DLUFP). It is recommended that the DLUFP be reviewed as part of the preparation of the Draft Plan.</p>
x) Submission regarding car parking and road maintenance in the Sandycove/Glasthule	A0139	<p>The contents of this submission are noted. <u>This is not a County Development Plan issue, rather it is an operational matter.</u></p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
Architectural Conservation Area (ACA) and urges DLR to address this problem.		
4.4.3 Car Parking		
i) Submissions on car parking request <ul style="list-style-type: none"> • Reduction of car parking particularly for apartment developments close to public transport. • Council should move toward Maximum car parking standards. • Need for a holistic approach promoting alternative modes, car clubs and bike sharing. • Car parking should be gradually reduced on a phased basis. • Not enough carparking in Stepside. • Low car parking standards should not apply to Mount Merrion. 	A0055 A0059 A0068 A0069 A0074 A0108 A0112 A0121 A0124 A0142 A0144	The contents of these submissions are noted. The reason for limiting the supply of car parking spaces (i.e. applying maximum car parking standards) is to limit car-borne commuting and thereby limit its unsustainable carbon and congestion impacts. In the current Plan, all non-residential uses have maximum car-parking standards. Residential use on the other hand have parking norms. The Section 28 Apartment Guidelines recommend an approach of reducing car parking provision to standards which are lower than the existing County Development Plan, while at the same time seeking car clubs, and increased cycle parking in quantitative and qualitative terms. This is a complex area. The Council are working with the NTA and the other Dublin Authorities to advance this issue. It is recommended that these issues be considered further in the preparation of the Draft Plan.
ii) Submissions recommends that car parking should be made less accessible in new development in order to make walking, cycling, and public transport the default option for routine trips. The other submission recommends that certain developments should be car free.	A0074 A0097 A0129	The contents of these submissions are noted. These issues will be considered in the preparation of the Draft Plan.
iii) Submission makes the case that the car parking ratios in the Cherrywood Planning Scheme are much higher than recommended by national guidance.	A0124	It is noted that the adopted SDZ Planning Scheme for Cherrywood is a stand-alone planning document separate from the County Development Plan and will not be amended by the new County Development Plan. <u>This is not a County Development Plan issue.</u>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
iv) Submissions refer to the role of car sharing/car clubs in contributing to sustainable travel and these should be available including in new developments.	A0121 A0133	The contents of these submissions are noted. The Council supports car clubs, this is reflected in ST23: Car Clubs in the current Plan. It is recommended that Policy ST23 policy be reviewed and updated in the preparation of the Draft Plan.
v) Submission state that car parking should not be free on Sunday as this encourages driving when there are excellent public transport routes. Another states that there should be targets for reducing 'free parking' within the county.	A0074 A0078	The operation of parking controls on the public street is an operational issue and is not a County Development Plan issue.
4.4.4 Transport Noise		
i) Submission expresses concern with increased motorway noise which also causes pollution and suggests that more trees are needed to reduce these damaging gases.	A0025	The contents of this submission are noted. <u>This is not a County Development Plan issue.</u> Motorway noise is currently monitored at a number of locations in the County by TII. Current measured noise levels give no cause for concern. NO2 is currently monitored at a number of locations on the M50 by TII. Current measured levels give no cause for concern. NO2 is also monitored by the EPA and again measured levels in this County give no cause for concern
ii) TII submission states that DLR should refer to the requirements of SI No 140 of 2006 Environmental Noise Regulations in the County Development Plan. Noise mitigation measures should be implemented and the cost of which should be borne by the developer.	A0062	The contents of this submission are noted. This issue is dealt with in planning applications on a case by case basis as appropriate. Proposed developments adjacent to existing roads should include mitigation measures for noise pollution. Likewise, proposed roads or road upgrades, adjacent to existing properties, should provide noise mitigation measure as part of the scheme.
iii) Submission expresses concern with respect to noise pollution from buses and cars and a sustained push towards electric vehicles and a reduction in cars would reduce this.	A0072	The contents of this submission are noted. DLR supports the move to sustainable transport including electric vehicles.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
4.4.5 Low Emission Vehicles		
i) Submission seeks to incentivise the use of LPG (liquefied petroleum gas) as a fuel for public, private and haulage transport as is the case in most other European countries where it is considered a green fuel.	A0012 A0025	The contents of these submissions are noted. The promotion of fuels is a matter for central government. The promotion of LPG as a fuel for vehicles <u>is not a County Development Plan issue.</u>
ii) Submission requests that the majority of private and commercial vehicles be electric or hydrogen with suitable charging / filling points made readily available.	A0050	The contents of this submissions are noted. The promotion of particular fuels is a matter for central government. The promotion of LPG as a fuel for vehicles <u>is not a County Development Plan issue.</u>
iii) Several submissions were received regarding electric vehicle charging. Some submissions require the provision of electric vehicles in retail and town centres and others on street for residents without charging capacity off-street including in conservation areas. Spaces should be considered for conversion to accommodate active travel options including bike parking, e-scooter schemes or new pedestrian plazas. The issue of future proofing of new permanent parking spaces to be supplied with, or to be future proofed to allow for the easy installation of electric vehicle charging points when required.	A0068 A0078 A0083 A0100 A0129 A0135 A0145	<p>The contents of these submissions are noted. Since the adoption of the current Plan, DLR has been trialling electric charging points on street lamps. It is Council policy to expand the network of public EV charging points, using the public lighting network, where feasible, and at other on-street or public parking locations subject to grant approval.</p> <p>DLR in conjunction with other Local Authorities in the Dublin Region are developing a strategy to provide for public electric vehicle charging infrastructure at on-street locations, in support of the Government Strategy on electric vehicles and use of alternative fuels – National Policy Framework on Alternative Fuels Infrastructure for Transport for Ireland 2017 to 2030. Therefore, this is an evolving policy area which will be appropriately covered in the Draft Plan. See Chapter 10.2 for a response on the future proofing of car parking spaces for EV charging.</p> <p>It is recommended that Policy ST21 of the current Plan which refers to electric vehicle roll out and charging be reviewed and updated to reflect the evolving policy area and RPO 7.42 of the RSES in the Draft Plan.</p>
iv) Submission recommends that compressed natural gas (CNG) could be used in transport to reduce	A0114	The contents of this submission are noted. Existing policy ST22 allow for making new CNG fuel filling points more readily available.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
carbon emissions and improve local air quality and suggests a policy wording.		It is recommended that policy ST22 be reviewed and updated in the Draft Plan.
4.4.6 Speeding/Illegal Parking/Other		
i) Submission from the TII requesting signage lighting and leisure signage to accord with national standards.	A0062	The contents of this submission are noted. <u>This is not a County Development Plan issue, rather it is an operational matter.</u>
ii) Submission request that the DLR reduce illegal parking in the County by increasing warden activity, an App and measures such as bollards.	A0074	The contents of this submission are noted. <u>This is not a County Development Plan issue, rather it is an operational matter.</u>
iii) Submission requests the Council to consider reducing speeds of vehicles outside schools and on approach to schools to 30kmph and to install speed calming infrastructure.	A0074	The contents of this submission are noted. DLR has already introduced 30 kph speed limits on 742 roads in housing estates. However, speed limits are subject to a separate statutory process and enforcement is a matter for the Gardaí. <u>This is not a County Development Plan issue.</u>
iv) Submissions highlights issues with access to mainstream transport options, bus stops, DART and rail, Luas, for disabled users and requests that DLR work with transport operators to improve accessibility.	A0052 A0053 A0146	The contents of these submissions are noted. It is DLR policy, under Policy ST4 of the current Plan, to support access for people with disabilities to public buildings, streets and public spaces including transport services. It is recommended that this policy be retained and updated. The NTA and the TII are responsible for the bus, Luas, DART and rail service. It is recommended that Policy ST4 of the current Plan be reviewed and updated in the Draft Plan.
v) Submission requests that disability awareness training is given to all staff of transport operators to ensure an organisation-wide standard for customers who are blind and vision impaired.	A0052	The content of this submission is noted. This is an operational issue. Training for transport operators on same would not be under the remit of the Council. However, transport operators such as Dublin Bus and Transdev work with Local Authorities and provide such training for staff to ensure transport is adapted for those with reduced mobility. <u>This is not a County Development Plan issue.</u>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
vi) Submission from the Environmental Health Department, Health Service Executive requests that DLR should incorporate actions and strategies of the following: Smarter Travel Policy; and, National Cycle Policy Framework.	A0054	The contents of this submission are noted.
vii) Submission requests that road safety concerns in relation to speed and traffic volume resulting from new developments (in Mount Merrion) are provided for in the Draft Plan and a traffic strategy for Mount Merrion must be set out.	A0055	The contents of the submission are noted. Regarding individual planning applications, when they are assessed consideration is given to road safety and traffic. The issue of traffic and road safety is covered in the current County Development Plan in Policy ST27. It is recommended that the Draft Plan will contain a similar policy to ST27.
viii) The submission from An Taisce requests that Mobility Management Plans must be made mandatory through the development management process for all planning applications (including one-off houses).	A0065	The contents of this submission are noted. It is recommended that Policy ST20 on Travel Plans be reviewed and updated in the preparation of the Draft Plan. Section 8.2.4.3 sets out the thresholds for Travel Plans in accordance with NTA advice. It is not considered reasonable or proportionate to require travel plans for every planning application.
ix) Submission regarding access, parking and traffic management at Bullock Harbour in the maritime context.	A0089	The contents of this submission are noted. There is already significant traffic management on Harbour Road near St Patrick's School. The issues raised relate to traffic management which is an operational matter for the Council and is not a County Development Plan issue.
x) The submission is concerned with schools contributing to heavy traffic congestion at the morning peak, which could be mitigated by spreading start times over a longer period from 7.30 to 9.30.	A0080	The contents of this submission are noted. School start times for existing schools, which are already constructed, are not within the remit of the County Development Plan or development management. Many schools already cooperate with nearby schools to stagger opening and closing times. This is not a County Development Plan issue.
xi) Submission requests 30kph speed zones be extended and better enforcement via traffic calming measures such as, road narrowing, speed	A0078	The contents of this submission are noted. Road design is prepared in accordance with the DMURS on a case by case basis. This is not a County Development Plan issue.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
bumps, one-way streets, no-throughways.		
xii) Submission states that there are not enough bus stop shelters, bus lanes and buses in the Stepside, Sandyford and Kiltiernan areas.	A0068	The contents of this submission are noted. The provision of the bus service and bus infrastructure is a matter for the NTA. There is a major programme to improve bus service in the County through the Bus Connects Programme. BusConnects will provide additional bus services and improved bus stop facilities, including shelters. It is recommended that the Draft Plan have a suite of policies which support improvement to the bus service including BusConnects.
xiii) Submissions supports the legalisation and regulation of e-scooters	A0026 A0097	Legislation on e-scooters is a matter for central Government. The Department of Transport Tourism and Sport recently conducted public consultation on the issue of powered personal mobility (including e-scooters). The results have yet to be published. <u>This is not a County Development Plan issue.</u>
xiv) Submission seeks for improvements to the inter-connection of sustainable transport systems. Better signage indicating alternative routes and walking times sought by two submissions.	A0100 A0145	The contents of this submission are noted. A key aspect of the NTA's BusConnects proposals is better interchange between various forms of public transport. BusConnects also proposes a 90-minute fare that will allow a customer to use any combination of bus, DART and Luas for a journey, subject to the last leg commencing within 90 minutes of the start of the overall trip.

Section 5: Enterprise and Employment

Key Issue	Sub. No.	Executive's Opinion & Recommendation
5.1 Location of Employment		
i) Submissions support employment and economic activity in various locations throughout the County including Sandyford, Carrickmines, Clonskeagh, University College Dublin (UCD), Dún Laoghaire, Blackrock, Cherrywood and other smaller employment hubs.	A0002 A0023 A0105 A0128	The contents of the submissions are noted. The Issues Paper included information on the existing employment landbank in the County. The Draft Plan will provide for future requirements having regard to inter alia population growth forecasts and will be informed by the contents of the Regional Spatial and Economic Strategy (RSES) and the Dublin Metropolitan Area Strategic Plan (MASP) including the “Guiding Principles to Identify Locations for Strategic Employment Development”. Cherrywood, Ballyogan and Sandyford are all identified in the MASP as “Strategic Employment Locations” on the Metrolink/Luas Green line Strategic Corridor while UCD is recognised as a “Technology and Innovation Pole”.
ii) Submissions makes recommendations with regards to the location of employment: <ul style="list-style-type: none"> • In close proximity to key transport hubs and where sustainable access is available. • Proximate to residential areas, thereby reducing the need to commute. • Develop employment in DLR as a counterbalance to the City Centre. • Locations that facilitate agglomeration and clustering. 	A0026 A0050 A0105 A0129 A0143	The contents of the submissions are noted and will be considered in the preparation of the Draft Plan. The Planning Authority agrees that the provision of quality public transport is a key element in the identification of employment land for people intensive employment uses. The majority of existing employment zoned land in DLR, with further development potential, including Sandyford, Carrickmines, and Cherrywood, are all on, or in close proximity to, the Luas Green Line. In terms of proximity to residential areas, the existing local level plans for each of the RSES identified “Strategic Employment Locations” – the Sandyford Urban Framework Plan, the Ballyogan and Environs Local Area Plan (LAP), and the Cherrywood Strategic Development Zone (SDZ) Planning Scheme - all include zoning objectives for significant amounts of residential development in tandem with other ancillary uses. The Planning Authority recognises the potential for employment lands in DLR to, in part, complement the City Centre. The Draft Plan will be informed by Regional Policy Objective (RPO) 5.6 of the RSES that recommends a sequential approach for the development of future employment lands, with a focus on the re-intensification of employment lands within the M50 and at selected strategic development areas in tandem with the provision of high-quality public transport corridors and subject to appropriate ancillary infrastructure being in

Key Issue	Sub. No.	Executive's Opinion & Recommendation
		<p>place.</p> <p>With regards to agglomeration, the Planning Authority see significant benefit in facilitating, through land use zoning, the clustering of employment land uses.</p>
5.2 Strategy, Policies and Objectives		
i) Submissions consider that businesses should be better supported through rates and rents.	A0003 A0133	The contents of the submissions are noted. Commercial rates and property rents are not County Development Plan issues.
ii) Submissions request that local business and employment is encouraged and seek measures to encourage start-up companies.	A0012 A0056	<p>The contents of the submissions are noted. The current Plan recognises the need for starter/incubator units to promote small to medium enterprise and, in this regard, Policy E10 states that it is Council policy to promote and assist in the provision of enterprise centres. It is recommended that the Draft Plan continues to support the development of enterprise centres for enterprises in the early stages of development.</p> <p>Separate to the County Development Plan process, the DLR Local Economic and Community Plan 2016-2021 (LECP) and DLR Local Enterprise Office (LEO) both promote and support economic development. DLR LEO provides a range of supports including financial supports, training/networking and business advice to companies at all stages of the business life-cycle.</p>
iii) Submission recommends the creation of a strategy for economic well-being targeted at disadvantaged areas in the County.	A0103	The contents of this submission are noted. The LECP is due for review.
iv) Submission recommends the provision of creative studio and work pod spaces for artists and writers.	A0100	The contents of the submission are noted. The Planning Authority recognises that cultural and creative industries are an important component of economic growth and employment creation. Policy E3: Creative County – Culture and Creative Industries of current Plan, states that it is Council policy to promote the development of creative enterprises in the County. It is recommended that the Draft Plan continues to support the development of cultural and creative industries.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
v) Submissions support the promotion of remote working, hot-desk spaces and local office space.	A0056 A0100	The contents of the submissions are noted. The Council acknowledges the increasing role of flexible working arrangements in modern work practices including home-working and shared workspaces. Policy E12 of the current Plan states that it is Council policy to permit home-based economic activities where, by virtue of their nature and scale, they can be accommodated without detriment to the amenities of residential areas and to promote and encourage the development of 'live-work' units in appropriate locations. It is recommended that planning policy be reviewed with respect to evolving workplace practices in the preparation of the Draft Plan.
vi) Submissions recognise the value of a highly skilled workforce and support the development of education and skills in a range of sectors.	A0050 A0129	The contents of the submissions are noted and agreed. The Planning Authority recognises that a well-educated and skilled workforce is a valuable human resource and strengthening skills and education opportunities will lead to greater innovation as well as social inclusion and improved well-being. A range of policies are included in the current Plan that focus on education, skills, innovation and enterprise including inter alia: Policy E2: Knowledge Economy; Policy E3: Creative County – Culture and Creative Industries; Policy E4: Further and Higher Education Institutions; Policy E5: Education and Skills; and Policy E10: Enterprise Incubator Units. It is recommended that the Draft Plan maintains and/or enhances the policy framework to sustain the existing high levels of educational attainment and skilled workforce in DLR.
vii) Submission recommends the provision of office space to support the development of a Chamber of Commerce/business network hub.	A0100	The contents of the submission are noted. <u>It is considered that the subject matter falls into the domain of the LEO as opposed to the County Development Plan,</u> however, the issue will be considered in the preparation of the Draft Plan.
viii) Submission suggests that innovation and entrepreneurship can be supported by facilitating innovative development.	A0119	The contents of the submission are noted and will be considered in the preparation of the Draft Plan.
ix) Submission states that DLR Chamber welcomes working with the Council and other stakeholders to enhance business initiatives. Suggests that all	A0137	The contents of the submission are noted. The Council recognises that the development of enterprise in the County comprises a wide range of contributory factors and this will be considered in the preparation of the Draft Plan. The Council supports ongoing collaboration

Key Issue	Sub. No.	Executive's Opinion & Recommendation
parties must work together to promote DLR as 'THE' place to live and work and to encourage economic growth. Submission supports initiatives in terms of wellbeing and work-life balance.		with relevant stakeholders to promote DLR as a place to invest and to do business. The current Plan promotes wellbeing indirectly through a range of policies including inter alia Policy E5: Education and Skills and Policy E12: Home Working/E-Working. It is recommended that the concept of well-being permeates the Draft Plan.
x) Submission calls for the establishment of a communication forum for the revival of Dún Laoghaire Town to include the Council, commercial interests, and the community.	A0133	The contents of the submission are noted. While the sentiment of the submission is welcomed it is considered that the specific request is not a County Development Plan issue. Reference is made to the already established Strategic Policy Committee (SPC) for Economic Development and Enterprise, the function of which is to oversee the development, co-ordination and implementation of the economic elements of the LECP. In addition, the Local Community Development Committees oversee the development, co-ordination and implementation of local and community development.
xi) Submissions include recommendations with regards to inclusive employment opportunities including: the promotion of an accessible workplace; increasing employment opportunities for persons with a disability; and, the incorporation of work needs assessments and partnerships with business in DLR.	A0053 A0100	The contents of the submission are noted. The Draft Plan will be prepared having regard to the National Disability Inclusion Strategy 2017-2021 which seeks to promote greater inclusion in society by people with disabilities. The policies in the current Plan were formulated having regard to the National Disability Authority's document 'Building for Everyone: A Universal Design Approach – Planning and Policy' (2012). In this context, the Draft Plan will be reviewed and updated. While separate to the County Development Plan process it is noted that all development proposals must be fully compliant with Part M of the Building Regulations (Access and Use).
xii) Submission recommends the expansion of apprenticeships and back-to-work schemes to facilitate job opportunities.	A0100	The contents of the submission are noted. Policy E6 of the current Plan states that it is Council policy to support the work undertaken by the Education and Training Boards in relation to courses provided under SOLAS and the establishment of community training centres, local training initiatives and specialist training provision. It is recommended that the Draft Plan continues to support the delivery of training and skills development.
xiii) The submission notes that there is a mismatch between the number of jobs in the County and the labour force participation rate. It is considered	A0112 A0124	The contents of the submission are noted. Results from Census 2016 indicate that the County's labour force participation rate was comparatively low at 58%. This is primarily due to both the number of persons in the retired age cohorts in addition to a significant quantum of

Key Issue	Sub. No.	Executive's Opinion & Recommendation
that more younger people are needed to live in the County and that more affordable home ownership and rental accommodation is required.		<p>third level students. In this context, it is considered that DLR has comparative advantage in access to a young and highly educated workforce residing within or proximate to the County.</p> <p>The statutory provision for affordable housing in the County Development has been removed. (There are schemes that relate to this issue under the Housing Acts).</p>
xiv) Submission praises the work being done by the DLR LEO. Submission notes that the DLR Lexicon library is used by sole traders and contractors and suggests it might be possible to provide more assistance by using the library as an outreach facility or an ad hoc incubator for new enterprises.	A0133	<p>The contents of the submission are noted and comments with regards to the work of DLR LEO are welcomed. The Council recognises the role of libraries as an important facility for members of the public to gain access to a range of valuable resources. <u>The specific day-to-day services offered by DLR's libraries is primarily an operational matter for the Council and not a County Development Plan issue.</u></p>
5.3 Tourism		
i) Submission contends that there is an opportunity to increase tourism by developing the harbour and ferry terminal into an attraction.	A0003	<p>The contents of the submission are noted. There are a series of policies and objectives in the current Plan to facilitate a range of uses within the Harbour area. It is recommended that these policies and objectives be reviewed and updated in the Draft Plan.</p> <p>It is noted that the ferry terminal has planning permission in place for development as a business incubator hub. In addition, there are two separate Urban Regeneration and Development Fund (URDF) studies of Dún Laoghaire Town and Harbour currently being prepared. The outcome of these studies will provide a key input with regards the future development of the Harbour area and the Draft Plan will be informed by same.</p>
ii) Submissions support the sustainable development of the coast, including coastal towns, as a tourism destination.	A0026 A0097	<p>The contents of the submissions are noted and broadly agreed. The Council recognises that the coast is an important tourism resource in DLR, however, it is considered that the coastal zone should be managed and developed in a way which protects and enhances its natural heritage and landscape. The Green County Strategy of the current Plan includes a range of policies which facilitate the sustainable growth of the coastal zone. The Draft Plan will review the existing policy framework with regards to the role of the coast as part of the sustainable</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
		<p>tourism 'offer' of the County.</p> <p>While separate to the County Development Plan process, coastal tourism is also supported in the DLR Tourism Strategy and Marketing Plan 2017–2022. The Council are collaborating with Fáilte Ireland in developing a new Dublin Coastal Trail and are also participating in a new EU project (URBACT III) exploring the topic of sustainable tourism, with the focus of the project on the coastal areas from Blackrock to Dalkey.</p>
<p>iii) Submission requests the County Development Plan to include another 'Tourism Strategy and Marketing Plan' which would include implementation of the Millennium Project and the promotion of the Wicklow Way.</p>	<p>A0032</p>	<p>The contents of the submission are noted. The current DLR Tourism Strategy and Marketing Plan 2017 –2022 sets out the case for tourism in the County. The Dublin Mountain Way and various other trails and parks are promoted as part of this Strategy. It is recommended the Draft Plan supports the delivery of the Strategy and any subsequent update thereof.</p>
<p>iv) Submission requests that consideration is given to the provision of accessible tourism for all facilities including attractions, accommodation, access, services and assistive technology.</p>	<p>A0053</p>	<p>The contents of the submission are noted. The Council actively promotes the principles of accessible tourism and supports businesses in the process of implementing 'tourism for all' interventions. The policies in the current Plan were formulated having regard to the National Disability Authority's document 'Building for Everyone: A Universal Design Approach – Planning and Policy' (2012). In this context, the Plan will be reviewed and updated. While separate to the County Development Plan process, it is noted that all development proposals must be fully compliant with Part M of the Building Regulations (Access and Use).</p>
<p>v) Submissions recommend the development of a variety of tourism trails including:</p> <ul style="list-style-type: none"> • A coastal trail similar to the Wild Atlantic Way. • Recreational trails created by local experts and academics that tell local stories. • The creation of food trails. 	<p>A0097 A0127</p>	<p>The contents of the submissions are noted. Regarding a coastal trail, Specific Local Objective (SLO) 93 of the current Plan promotes the development of the Sutton to Sandycove (S2S) promenade and cycleway as a component part of the National East Coast Trail Cycle Route. It is recommended, that the SLO for the S2S/East Coast Trail is reviewed and updated in the Draft Plan. In addition, the Council are currently collaborating with Fáilte Ireland to develop a new Dublin Coastal Trail.</p> <p>Regarding thematic trails, it is considered that the level of detail requested extends beyond</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
		<p>what would be strategic policies on tourism in a County Development Plan. Policy LHB17 of the current Plan states that it is Council policy to promote the development of regional and local networks of hiking and walking routes/trails. It is recommended that the Draft Plan continues to provide strategic level support for the development of hiking and walking routes/trails that provide for a wide range of interests.</p> <p>The development of trails is also supported in the DLR Tourism Strategy and Marketing Plan 2017–2022. With regards to thematic trails, the LECP includes an action to create and promote new tourism trails centred around various themes, including food. Furthermore, the DLR Heritage Plan 2013-2019 also includes an interpretation programme which includes information boards and signage in the public realm and printed materials such as maps and trails.</p>
vi) Submission states that the mountains in DLR have the potential to be a sustainable and beneficial resource for the County and efforts should be made to improve this area for visitors.	A0097	<p>The contents of the submission are noted. The Council recognises the recreation and tourism potential of the Dublin Mountains. The current Plan includes a number of policies which support recreation in the mountains including inter alia: Policy LHB13: Dublin Mountains Strategic Plan; Policy LHB15: Recreation Access Routes; Policy LHB16: National Park; and Policy LHB17: Trails, Hiking and Walking Routes. It is recommended that the Draft Plan continues to support the sustainable management of recreation in the Dublin mountains.</p> <p>Furthermore, the Council are members of the Dublin Mountains Partnership which comprises representatives from a wide range of partner organisations. It is recommended that the Draft Plan continues to support the role of the Dublin Mountain Partnership in improving the recreational experience for users of the Dublin Mountains.</p>
vii) Submission requests that reference be made to the important role that Dalkey plays in the economy and tourism offer of the County.	A0119	<p>The contents of the submission are noted and will be considered in the preparation of the Draft Plan. The Council recognises the significant role of Dalkey in the tourism offer of the County and the value of this tourism to the local economy in Dalkey. The DLR Tourism Strategy and Marketing Plan 2017 –2022 includes a number of proposals which support the tourism 'offer' of Dalkey. It is recommended that the Draft Plan will support the delivery of the</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
		Strategy and any subsequent update thereof.
viii) Submission suggests that DLR should establish connected transport links to enable visitors to traverse visitor attractions in the County.	A0127	The contents of the submission are noted. One of the primary objectives of the DLR Tourism Strategy and Marketing Plan 2017-2022 comprises raising awareness of the network of key visitor experiences in the County and connecting these visitor destinations, where possible. The Draft Plan will support the delivery of the Strategy and any subsequent update thereof.
ix) Submission from Fáilte Ireland highlights the importance of tourism to the economy and requests that tourism be considered as one of the most important indigenous sectors. Guiding principles for sustainable tourism are provided. Submission seeks the following to be included: <ul style="list-style-type: none"> • A dedicated chapter on tourism. • Spatial mapping for identifying tourist features, transport links, accommodation and other associated features. • Use of appropriate branding. • Provision of supporting infrastructure including accommodation, restaurants, parking, toilets and public realm. • Tourist information resources. • Clustering of tourism services and facilities. • Visitor Experience Development Plans. • Festivals as key drivers for tourism growth. • Support for mountain biking. • Support for a year-round activity destination. • Tourism branding on the Dublin Coastal Trail. 	A0101	The contents of the submission are noted and will be considered in the preparation of the Draft Plan. The Council recognises the importance of tourism to the local, regional and national economy. In the local context, DLR possesses a generous number of natural, cultural, recreational and heritage-based assets, which provide the foundations for a strong tourism sector in the County. At a strategic level, Policy E14 of the current Plan states that it is Council policy to co-operate with the appropriate agencies in promoting sustainable tourism and securing the development of tourist and recreation orientated facilities in the County. It is recommended that the Draft Plan continues to support this objective. <p>The Planning Authority acknowledges the value of many of the recommendations outlined in the submission. In terms of a more detailed approach towards tourism, the DLR Tourism Strategy and Marketing Plan 2017–2022 sets out the case for tourism in the County. The Strategy is comprehensive in nature and incorporates many of the recommendations that are referred to in the submission. In this context it is considered that the DLR Tourism Strategy and Marketing Plan, as a stand-alone document, is the appropriate mechanism for setting out DLR's comprehensive strategy for tourism. It is recommended that the Draft Plan will provide the strategic level support and policy framework to promote sustainable tourism in the County in addition to providing the appropriate support for the delivery of the DLR Tourism Strategy, and any subsequent update thereof. Having regard to the fact that DLR have a separate Tourism Strategy for the County, it is not recommended that a standalone chapter be provided on tourism.</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<p>x) The submission recommends the inclusion of additional policies with respect to tourism and recreation including as follows:</p> <ul style="list-style-type: none"> • Support development to improve public access to beaches, the coast, rivers, upland areas and other outdoor recreation areas. • Promote the recreational use of the coastline, rivers and the development of Blueways. • Protect and preserve recreational attractions. • Prohibit developments that are inappropriate to the traditional character of an area. 	A0014	<p>The contents of the submission are noted and will be considered in the preparation of the Draft Plan. It is noted that policies contained in the current Plan are broadly in line with those recommended. The Chapter on 'Green County' includes a number of policies that deal specifically with access to recreational areas, the promotion of recreational areas, and the protection of natural heritage and the environment. These policies are further supported by the Green Infrastructure Strategy, included as Appendix 14 of the current Plan. Current Plan policies and the Green Infrastructure Strategy will be reviewed and updated in the Draft Plan.</p> <p>Overarching development management policies ensure protection from insensitive development.</p>
<p>xi) Submission notes the potential to further develop tourism in the County on the basis of its rich cultural and natural heritage.</p>	A0133	<p>The contents of the submission are noted. The Council recognises that the County's heritage is one of the main attractions for visitors and comprises an important component in the County's tourism 'offer'. The DLR Tourism Strategy and Marketing Plan 2017 –2022 seeks to bring to life the cultural heritage aspects of DLR – both in terms of its historic significance as well as its contemporary relevance. It is recommended that the Draft Plan will support the delivery of this Strategy, or any update thereof.</p>

Section 6: Retail

Key Issue	Sub. No.	Executive's Opinion & Recommendation
6.1 Strategic Context		
6.1.1 Retail Policy Approach		
i) Submission recommends a shift in policy away from retail led categories in order to better support historic centres, such as Dalkey, Dún Laoghaire and Blackrock, from a social, historic and civic perspective.	A0119	The contents of this submission are noted. It is recognised that in reality, these centres play a far more varied and complex role in the spatial, cultural, economic makeup and overall identity of the County. It is also recognised that the historic towns and villages of the County have always evolved and will continue to do so. It is recommended that the Draft Plan seek to ensure that this evolution continues to take place in a manner that best serves DLR as a sustainable and climate resilient County.
ii) Submission recommends that the retail strategy should be part of Local Area Plans (LAPs).	A0151	The contents of this submission are noted. The Planning and Development Act, 2000 (as amended) (the PDA) requires any LAP to be fully consistent with the relevant Development Plan in addition to other relevant national and regional planning policies. As a result, any LAPs adopted by the Council will by necessity be in line with the relevant retail strategy contained in the Development Plan.
6.1.2 Retail Offer		
i) Submission argues that the existing retail offer is excessive with a generic offer that has an adverse impact on small local retailers.	A0012	The contents of this submission are noted. The provision of additional large-scale retail units in the County is determined on the basis of, amongst other things, a 'retail hierarchy' which forms the basis for determining the quantum and location of new retail development. This approach seeks to ensure that retail provision in the County satisfies the retail needs of the population, including those provided by small local, and niche retail service offerings.
ii) Submission states that a range of outlet types and sizes should be provided close to residential communities.	A0050	The contents of this submission are noted and agreed. It is recommended that in the Draft Plan, the retail hierarchy will continue to provide for neighbourhood centres, the function of which is to provide a range of convenient and easily accessible retail outlets and services within walking distance for the local catchment population.
iii) Submission requests that the Draft Plan includes a	A0065	The contents of this submission are noted but are not agreed. A healthy and vibrant retail

Key Issue	Sub. No.	Executive's Opinion & Recommendation
policy which restricts large floor-plate multiples, which are dependent on complex oil-dependent supply chains, in favour of smaller floor-plate local shops.		environment includes access to both large scale floor-plate multiples and smaller floor-plate local shops in appropriate locations.
iv) Submission states that sufficient retail space exists in the area already and that the construction of additional housing should be prioritised instead.	A0081	The contents of this submission are noted. It is recommended that the Draft Plan seek to ensure that both the retail and residential needs of the people of Dún Laoghaire are met in accordance with all relevant national and regional planning policies.
v) Submission recommends that the reference in the current Plan to avoiding over provision of retail be retained.	A0151	The contents of this submission are noted and will inform the Draft Plan preparation.
vi) Submission requests that the Draft Plan should make reference to, and specifically cater for the increasing prevalence and importance of experiential retailing.	A0107	The contents of this submission are noted. It is recognised that recent significant changes in both demographics and consumer behaviour have had a considerable impact on the retail sector and have led to the growth of 'experiential' retail, with a shift from town centres dominated by comparison retail to one where more time is spent on 'experiences' including leisure, culture, food, beverages and retail services. It is recommended that Draft Plan have regard to these changes.
6.1.3 Retail Use Types		
i) Submission requests that the Draft Plan should include a specific policy that explicitly provides that the change of use of retail warehouse units to non-bulky goods comparison and/or convenience uses will not be permitted.	A0065	The contents of this submission are noted. The Retail Strategy for the Greater Dublin Area 2008–2016 commented on the significant increase in retail warehousing park schemes in the Greater Dublin Area since 2001 and emphasised the need for careful consideration of additional retail warehouse floorspace in future. In preparing the Draft Plan, it is recommended that the Council give heed to the cautionary sentiment outlined in the Retail Strategy.
ii) Submission recommends that retail policy should be more flexible in terms of uses in the light of	A0124	The contents of this submission are noted. The Planning Authority would not agree fully with the submission. The Retail Guidelines state that where a significant element of a store is

Key Issue	Sub. No.	Executive's Opinion & Recommendation
new retail formats such as cross-over style retail where convenience and comparison goods are increasingly sold in the same premises.		indicated to be for comparison goods the potential impact of that element of the store on existing comparison goods stores within the catchment must be included in the assessment of the application. This is carried through to the current Plan – see section 8.2.6.2 and it is recommended that it also be included in the Draft Plan.
6.1.4 Retail Design		
i) Submission requests that retail developments are accessible to all and are designed in accordance with universal design principles.	A0053	The contents of this submission are noted. Any new retail development must meet the requirements of the building regulations which are separate to the planning code.
ii) Submission calls for provision of design guidelines in relation to retail development.	A0151	The contents of this submission are noted. The 2012 Retail Planning Guidelines were accompanied by a Retail Design Manual. In addition, the Regional Spatial and Economic Strategy (RSES) recommends that local authorities support the preparation of design guidelines to provide for improvements in the appearance of streetscapes and in revitalising vacant spaces. It is recommended that the Draft Plan include a policy to address same possibly via the Local Area Plan process for the two Major Town Centres.
6.1.5 Complementary Uses		
i) Submissions recommend the integration of leisure, recreational, cultural and civic facilities into towns and villages.	A0100 A0143 A0151	The contents of these submissions are noted and agreed. It is recommended that the forthcoming Draft Plan include policy objectives that support the multifunctionality of centres.
ii) Submission recommends a requirement for café/restaurant uses in retail development.	A0151	The contents of this submission are noted. Café- and restaurant-uses form an important part of the overall mix of uses provided in the County's retail centres, and they are permitted uses under a wide range of land use zoning designations. However, it is not considered appropriate to require such uses to be provided in all retail schemes.
iii) Submission recommends that a percentage of retail properties incorporate "Living Over the	A0151	The contents of this submission are noted and will inform the preparation of the Draft Plan.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
Shop" (specific reference to Dundrum).		
6.1.6 Town Centres and Vacant Sites		
i) Submission requests that the Planning Authority should take an active role in site assembly for new retail development by using Compulsory Purchase Orders (CPO).	A0065	The contents of this submission are noted. <u>This is not a County Development Plan issue.</u>
ii) Submissions raise various issue relating to commercial rates.	A0133 A0146	The contents of these submissions are noted. <u>The issue of commercial rate determination is an operational matter and will not be addressed through the Development Plan process.</u>
6.2 Retail Strategy and Sustainability		
6.2.1 Retail and Sustainable Transport		
i) Submissions emphasise the need to ensure new retail development is accessible by more sustainable modes of travel such as public transport, cycling and walking.	A0026 A0050 A0151	The contents of these submissions are noted. <u>It is recommended that the Draft Plan will seek to ensure, as far as possible, that new retail development is accessible by more sustainable travel in accordance with best practice and with the requirements of both the 'Retail Planning Guidelines for Planning Authorities', the accompanying design manual and the existing Retail Strategy for the Greater Dublin Area,</u>
ii) Submission requests that the Planning Authority require the introduction of car parking charges for out-of-centre retail development and introduce a corresponding S.48 waiver for development contribution levies in lieu of off-street car parking for new retail development in town centre locations.	A0065	The contents of this submission are noted. <u>The issue of development contribution levies is an operational matter and is addressed under the Council's Development Contribution Scheme 2016-2020.</u>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
6.2.2 Focus on Town and Village Centres		
i) Submission recommends that footfall should be encouraged in town centres and high streets.	A0026	The contents of this submission are noted. It is recommended that the Draft Plan seek to support and maintain existing town, district and neighbourhood centres and adopt a general presumption against large out-of-town retail centres in the County.
ii) Submissions recommend that new car dependent retail-only centres and out of town centres should be prohibited.	A0143	The contents of this submission are noted. It is recommended that the Draft Plan seek to support and maintain existing town, district and neighbourhood centres and adopt a general presumption against large out-of-town retail centres in the County.
iii) Submission recommends that the Draft Plan focus on the Sustainable Urban Village concept as a driver for retail development.	A0151	The contents of this submission are noted and will inform the preparation of the Draft Plan.
6.2.3 Small Businesses and Local Shops		
i) Submissions request that: <ul style="list-style-type: none"> Small local businesses be provided in small town/village centres, development of local shops and sole trader retailers to be incentivised and encouraged. 	A0025 A0146	The content of these submissions is noted. It is recommended that the Draft Plan seek to embrace and support the development of the County's Major Town Centres, District Centres and Neighbourhood Centres as multifunctional centres which support a variety of uses, including small local businesses. Local centres are identified as having an important role to play in this as they can provide more niche retail and community services in smaller units.
6.2.4 Local Markets		
i) Submissions support local farmers markets. Submissions also call for to include a policy for the promotion of local farmers' markets and identify locations where farmers' markets can take place.	A0026 A0056 A0065 A0133 A0146 A0151	The contents of these submissions are noted. In the existing Plan, Policy RET8: 'Casual Trading Areas' states, amongst other things, that it is Council policy to promote organic producers and producer-only products through the provision of its 'CoCo Markets' and to promote seasonal and craft markets, including privately operated farmers markets. It is recommended that this policy be carried over into the Draft Plan.
ii) Submission calls for fewer food retailers in County	A0133	The contents of this submission are noted. The detailed arrangements for the operation of

Key Issue	Sub. No.	Executive's Opinion & Recommendation
Council run markets and for more arts and crafts retailers instead.		<u>Council-run markets is an operational matter and will not be addressed through the Development Plan process.</u>
iii) Submission suggests providing wooden cabins for retailers in County Council run markets which are said to be better for bad weather.	A0133	The contents of this submission are noted. <u>The detailed arrangements for the operation of Council-run markets is an operational matter and will not be addressed through the Development Plan process.</u>
6.3 Existing Retail Hierarchy		
6.3.1 Major Town Centres – Dún Laoghaire		
i) Submissions raise concern in relation to impact of Carrickmines Phase 2, Cherrywood and Dundrum on Dún Laoghaire.	A0002 A0146	The contents of these submissions are noted. The primary role of Cherrywood and Carrickmines is to meet the existing and future needs of the new settlement of Cherrywood as well as the growth areas of Carrickmines, Stepside-Ballyogan and Kiltiernan-Glenamuck. Development in Dundrum is in line with the overarching retail hierarchy.
ii) Submissions express concerns as to the current state of Dún Laoghaire Shopping Centre and call for its rejuvenation.	A0003 A0029	The contents of this submission are noted. The Dún Laoghaire Urban Framework Plan (Appendix 12 to the current Development Plan) refers to a specific local objective (SLO154) “to encourage and support the redevelopment and refurbishment of the Dún Laoghaire Shopping Centre Site - in accordance with the provisions of the Dún Laoghaire Urban Framework Plan - in advance of the adoption of the Dún Laoghaire and Environs Local Area Plan”. It is envisaged that this policy approach will be retained in the Draft Plan.
iii) Submission requests a focus be put on the old harbour buildings and open the buildings up to public/retail use or be utilized by the Council.	A0078	Permission has been granted. An application was recently granted by the Council (DA19A/0947) to allow for temporary use of the ferry terminal building including a food court. This decision is currently under appeal to An Bord Pleanála (PL06D.306746).
iv) Submissions raise issues in relation to retail in Dún Laoghaire including the need for an increased emphasis on encouraging restaurants, culture, entertainment and late openings, concern in	A0003 A0029 A0078 A0137	The contents of these submissions are noted. The shift in consumer behaviour towards increased demand for ‘experiential’ retail, and the food and beverage sector, may places Dún Laoghaire town in a strong position for future growth as a “destination”. Similar to other towns, Dún Laoghaire as a retail centre is challenged by changes in retail patterns. The

Key Issue	Sub. No.	Executive's Opinion & Recommendation
relation to current levels of vacant retail units and the perceived concentration of suboptimal retail uses. One submission criticises the poor choice of supermarkets.	A0143 A0147	increase in population in the wider Dún Laoghaire hinterland offers an opportunity to improve the viability and vitality of the town. <u>Decisions around opening hours and incentives for same are beyond the remit of the County Development Plan or the Council.</u>
6.3.2 Major Town Centres – Dundrum		
i) Submissions support the establishment of more small business in Dundrum Village and consider that Dundrum lacks services appropriate to a Major Town Centre (MTC) including a civic centre	A0136 A0151	The contents of these submissions are noted. Dundrum is identified as a MTC in the overarching regional retail hierarchy. Work is ongoing on the Dundrum Local Area Plan which will address some of these more localised planning issues. As part of the background work on the Dundrum LAP a separate study has been carried out on community infrastructure requirements for the area.
ii) Submission suggests different use of retail terminology in relation to Dundrum (MTC, Village, Phase 2 etc).	A0151	The contents of this submission are noted and will be considered in the preparation of the Draft Plan.
6.3.3 District Centres		
i) Submission is critical of latest retail development in Blackrock.	A0146	The contents of this submission are noted.
6.3.4 Neighbourhood Centres		
i) Submission recommends that Dalkey is referred to as a Town and considers that the designation of Dalkey as a 'Neighbourhood Centre' is not appropriate.	A0119	The contents of this submission are noted but not agreed. The level of services in Dalkey are commensurate with a Neighbourhood Centre designation and it is not recommended that its status be altered in the Draft Plan.
ii) Submission requests that the village of Foxrock should be safeguarded in terms of its role in providing a local and personal experience.	A0113	The contents of this submission are noted. It should be noted that much of Foxrock Village has been designated as an Architectural Conservation Area (ACA) and as a result, the built heritage of the area is afforded protection from development which may have an adverse

Key Issue	Sub. No.	Executive's Opinion & Recommendation
		impact on its historic character.
6.3.5 Changes to the Retail Hierarchy		
i) Submissions request that Sandyford Business District (SBD) be designated as a Major Town Centre (MTC) in the retail hierarchy and that if SDB not designated as MTC it should be designated as a District Centre (DC).	A0091 A0098	The content of these submissions is noted. The Sandyford Urban Framework Plan (SUFPP) which forms part of the current Plan states that retail should be " <i>at a scale appropriate in a neighbourhood centre</i> ". Sandyford is not identified as a DC or MTC in the current retail Strategy for the Greater Dublin Area (GDA). The provision of retail commensurate with a Neighbourhood Centre (NC) in the SUFP area is such so as to ensure that the scale of retail does not undermine the current retail hierarchy in the County or result in provision of retail that will draw in retail only trips to the area.
ii) Submission states that is it a strategic objective of the UCD Students' Strategic Vision to prepare and implement a retail strategy for the campus.	A0083	The contents of this submission are noted. It is not considered appropriate for the Council to prepare a retail strategy for the UCD campus as it is already subject to the wider policy framework relating to retail development in the County

Section 7: Green County

Key Issue	Sub. No.	Executive's Opinion & Recommendation
7.1 Landscape Character		
7.1.1 Landscape		
i) The submission suggests that the following objective should be included in the new Plan, "in assessing development proposals ensure that it does not have a negative effect on the character of the landscape, natural heritage, views and prospects, scenic routes, archaeology, local amenities"	A0014	The contents of the submission are noted. It is recommended that suggested objective will be taken into account in the preparation of the Draft Plan.
ii) Submission seeks the inclusion of a walking trail around the old granite quarries above Barnacullia and investigation of same for designation as a County heritage site.	A0041	The contents of the submission are noted. There is an existing right of way through Fernhill Park which utilises the existing granite sets and links up to Barnacullia. This does continue via informal walking routes on private lands around Barnacullia. Designation as a Heritage site is a matter for the National Parks and Wildlife Service of the Department of Arts, Heritage and the Gaeltacht.
iii) Submission requests that natural heritage is accessible to all and seeks the provision of wheelchair viewing platforms, rest stops, safe, accessible viewing areas, help points and charging points.	A0053	The contents of the submission are noted. DLR endeavour in their parks to incorporate the principle of universal design in design proposals including 1 in 20 gradient, and rest stops etc, where practicable. In some instances, because of gradient and terrain it may not be possible. Some Natural Heritage sites are in private ownership and/or fall under the control of the National Parks and Wildlife Service of the Department of Arts, Heritage and the Gaeltacht.
iv) The submission suggests a new detailed wording for existing Policy LHB1: Access to Natural Heritage.	A0014	The contents of the submission are noted. The current policy LHB 1 aims to achieve access to heritage in a balanced way while protecting the natural heritage of the County." The existing policy reflects this and indeed was added as a new policy to the 2016 plan based on an identical submission. It is not recommended that the proposed text be added to as the issues raised are already covered under current Plan policies, such as, LHB13, LHB14, LHB15 and LHB17, which will be retained in the Draft Plan.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
v) The submission suggests that an additional policy should be included to “ <i>preserve the open character of commonage land and other hill land and secure access over paths and tracks through consensus with landowners, particularly in mountain areas</i> ”.	A0014	The contents of the submission are noted and welcomed. DLR are actively working with landowners, with respect to tracks, paths and rights of way in these types of locations. It is recommended that when reviewing the policies in Section 4.1 of the current Plan, consideration be given to whether this text can be incorporated into current Plan Policy Objective LHB 17: Trails, Hiking and Walking Routes, for inclusion in the Draft Plan.
vi) The submission suggests new wording of the following policies: <ul style="list-style-type: none"> Policy LHB19: Protection of Natural Heritage and the Environment. Policy Pol LHB25: Rivers and Waterways 	A0014	The contents of the submission and the suggested wording are noted. However, the current wording with respect to Policy LHB19: Protection of Natural Heritage and the Environment adequately covers the matter. The suggested new policy wording for LHB 25 is welcomed, having regard to recent ecological projects of the County, changes in legislation and other relevant policies, plans and guidance including those relating to climate change, nature-based solutions and biodiversity. It is recommended that the current Plan Policy LHB25: Rivers and Waterways, be reviewed and updated in the Draft Plan.
vii) The submission suggests that a new policy should be included in the new Plan with respect to Wetlands.	A0014	The contents of the submission are noted, and the suggested new policy wording is welcomed. However, the current Plan policy LHB25: Rivers and Waterways, refers to wetlands and, therefore, a new policy in this regard is not warranted.
viii) Submission requests that underdeveloped sites are opened up for ‘freedom to roam’ to enable the public to connect with nature.	A0138	The contents of the submission are noted. This request is outside of the remit of the Planning Department as the majority of these lands are in private ownership. <u>Therefore, this is not a County Development Plan issue</u>
ix) Submission requests the protection of the rural parts of the County - in terms of access to, and vistas of the Dublin Mountains.	A0140	The submission is noted.
7.1.2 Landscape Character Assessment		
i) The submission suggests that with respect to Historic Landscape Character Areas, the new Plan	A0014	The contents of the submission are noted. While the suggested wording is noted, however, the current Plan Policy LHB5 wording with respect to Historic Landscape Character Areas

Key Issue	Sub. No.	Executive's Opinion & Recommendation
should include general landscape policies with respect to public access, access to commonage, development of uplands, the preservation of traditionally open/unfenced landscapes and the protection of sensitive landscapes.		Section 4.1.2.4 provides sufficient guidance with respect to landscaping policy requirements. Notwithstanding this, it is recommended that policies and objectives contained within the current Plan will be reviewed, edited and updated, where appropriate, as part of the Draft Plan.
ii) Submission from Fáilte Ireland seeks an update to landscape character areas.	A0101	The contents of the submission from Fáilte Ireland are noted and welcomed. It is recommended, that the existing Landscape Character Assessment be retained and updated in the Draft Plan.
7.1.3 Views & Prospects		
i) Submissions seek: <ul style="list-style-type: none"> The protection of views along the Dublin Mountains way. The protection of important views. 	A0041 A0065	The contents of the submission are noted. It is recommended that existing policy objectives on views be retained and reviewed in the Draft Plan.
7.1.4 The Coast		
i) The submission suggests that the policy with respect to seascapes i.e. LHB3, should be repositioned within the new Plan to Coastal Zone Management and suggest a new wording for existing Policy LHB7 and LHB 10.	A0014	The content of this submission is noted. With a new policy environment emerging around the National Marine Planning Framework (NMPF), DLR will be considering updating and revising the reference to coastal planning in the Draft Plan.
ii) Submission suggests that additional policies should be included with respect to coastal path/greenways, the control of car parking and vehicular movements on beaches.	A0014	The content of this submission is noted. Beach Bye laws from 2012 are in place in DLR that prohibits use of motor vehicles on beaches. <u>This is not a County Development Plan issue.</u>
iii) Submission states that there is a distinct lack of	A0146	The content of this submission is noted.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
sea facing restaurants, bars and shops in the County, due to residential development.		
iv) Submission requested the Plan to have a stronger emphasis on, and recognition of, our whole coastline as a public amenity.	A0089	The contents of the submission are noted and welcomed by DLR.
7.1.5 Rights of Way		
i) The submission recommends that DLR consider, when assessing planning applications, the impact on public access to the countryside including public rights of way, walking routes, recreational activities and amenities and the openness and visual amenity of the countryside	A0014	The contents of the submission are noted. In the assessment of any planning application for new developments in DLR, the impact on the adjoining amenity is considered and assessed by the Planning Department. This includes any potential negative impact on public access and existing rights-of-way existing in the County. DLR acknowledges the importance of these public rights of way, walking routes, recreational activities and amenities, which are add to the amenity of the countryside and, therefore, should be preserved, where possible in the Draft Plan.
ii) Submissions recommend that DLR identify existing public rights of way and established walking routes, (on a map) and maintain them free from development and that an extended network of Public Rights of Way should be considered in the Plan.	A0014 A0080	The contents of the submission are noted. DLR has a strong track record in displaying rights-of-way on the County Development Plan Maps, and considerable work was done as far back as the 2004 – 2010 County Development Plan on including rights-of-way. This has carried through to the current Plan. It is recommended that existing rights of way and walking routes will be indicated, where possible, on the Draft Plan Maps. The Lissadell case has, however, had a bearing on the ability of Local Authorities in including additional ROWs, as the burden of proof has become very high and rests solely with the Planning Authority.
7.1.6 Trees & Hedgerows		
i) Submissions: <ul style="list-style-type: none"> recommends that more trees are planted. DLR should play an active role in achieving national strategies aimed at planting millions 	A0020 A0026 A0036 A0046	The contents of these submissions are noted. DLR Parks and Landscape Services are preparing a Draft Tree Policy and are also updating the 'DLR Tree Strategy', although it is estimated that this will not be prepared until after the preparation of the Draft Plan. It is recommended that both will be referenced in the Draft Plan.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<p>of new trees in areas like Shankill.</p> <ul style="list-style-type: none"> • highlights the work carried out by Shankill tidy towns in terms of tree replacement and planting in the area. • DLR should plan to be a green County, noting that trees are essential to our health, reduce air pollution and promote mental health. • Trees should be protected as they mitigate climate change. • trees planted should be species native to Ireland. • Recommends that tree felling be a criminal Act 	<p>A0050 A0056 A0072 A0080 A0097 A0133 A0143 A0146</p>	<p>In operational terms, DLR Parks and Landscape Services has an ongoing programme of roadside Tree Planting during the annual planting season (autumn-spring). Planting is based on an approach that aims to ensure 'the-right-tree-in-the-right-place'. Trees are planted both as replacements for removed trees, and new trees in new locations. Older trees play a significant role in carbon capture and other vital Ecosystem Services. These roles are identified in DLR's Climate Action Plan (2019-2024). While natives can be a priority, it's important to note that some exotic tree species are resilient to Climate Change, and emerging research is recommending using such climate resilient species. DLR acknowledges the need to protect the existing green infrastructure to mitigate climate change. It is recommended that this be included in the Draft Plan.</p>
<p>ii) Submission seeks the establishment of a register of the finest trees in the County.</p>	<p>A0041</p>	<p>The new DLR Trees Strategy will include a broader, holistic Urban Forestry approach, with ambitious goals and targets for conserving and managing the County's existing, diverse tree population. DLR Parks and Landscape Services recently embarked on project to record – as far as possible – the most significant (in terms of contributions to Landscape Character, Cultural Heritage, Biodiversity and Ecosystems Services) trees in the County. This is a substantial mapping project. It is recommended that the mapping project, if completed expeditiously, will inform the Draft Plan.</p>
<p>iii) Submission requests that special feature hedgerows in the County are identified and included in the plan.</p>	<p>A0041</p>	<p>The contents of the submission are noted. DLR are currently reviewing the previously prepared Hedgerow Survey, 2007. It is recommended that the current Plan policy, with respect to hedgerows, be updated accordingly in the Draft Plan.</p>
<p>iv) Submission contends that with good design there should be no conflict between buildings and incorporation of trees in new development.</p>	<p>A0151</p>	<p>The contents of the submission are noted and agreed.</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
v) Various submissions requests that a comprehensive survey of all of the trees in the County.	A0065 A0072 A0079	DLR Parks and Landscape Services recently embarked on a project to record – as far as possible – the most significant (in terms of contributions to Landscape Character, Cultural Heritage, Biodiversity and Ecosystems Services) trees in the County. This is a substantial mapping project. It is recommended that the mapping project, if completed, will be used to review the existing tree symbols, in the Draft Plan.
vi) Submission states that the Plan needs to include metrics on the extent of tree cover in the County area.	A0080	The issues raised in this submission fall within the remit of the current review of the Council's Tree Strategy (2011-2015), and not the Draft Plan.
vii) Submission requests that the existing mature woodland in the County, should be enhanced and preserved (e.g. the mature woodland at South County Business). The submission also requests that the area of mature woodland around Leopardstown hospital should be protected from development.	A0079	The contents of the submission are noted and welcomed. The Sandyford Urban Framework Plan (SUIFP), refers to the protection of the existing mature woodland at South County Business Park from development. In addition, the current Plan, also includes a Specific Local Objective (SLO) 121, "to ensure the provision of pocket parks and civic spaces in accordance with locations specified on Map 1 and Drawing no. 10 of the Sandyford Urban Framework Plan". It is recommended that this SLO be retained in the Draft Plan.
viii) Submission states that it is a strategic objective of the UCD Students' Strategic Vision to increase the number of trees and planting to maximise biodiversity on the campus.	A0083	The content of this submission is noted. Further tree planting and biodiversity enhancement in UCD is a matter for the College authorities. This is not a County Development Plan issue.
ix) Submission from An Taisce notes that the trees and woodlands of Marlay House Demesne form a significant feature in the landscape.	A0065	The contents of the submission are noted and the landscape and settling of Marlay House is acknowledged. DLR Parks and Landscape Services will strive to protect, enhance and preserve the setting of Marlay House.
x) Submissions relate to wildflower planting as follows: <ul style="list-style-type: none"> • recommend the planting of more trees, greenery and wildflowers. 	A0018 A0068 A0081	The contents of the submission are noted and DLR fully supports the suggestions, although they are more operational issues rather than County Development Plan issues. However, the ethos of Parks and Open Space management has changed in recent years and continues to evolve with the emphasis being on maximising tree canopy cover where possible, eliminating

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<ul style="list-style-type: none"> notes an increase in the number of 'wild meadows' on verges and medians and appreciates the wild tree and vegetation section in Cabinteely Kilboggett and Shanganagh parks 		<p>the use of herbicides, and encouraging the proliferation of wildflower, bulb and herbaceous planting schemes that seek to maximise biodiversity and encourage pollinators. DLR have areas in the existing parks, within the County that have been set aside for wildlife and pollinators. These areas are indicated by DLR 'Pollinator Signs'. A number of orchards and fruit trees have been planted in existing parks to encourage their use by bees and other insects. The Biodiversity plan will deal with these issues in detail. It is recommended that the County Development Plan support these initiatives.</p>
xi) Submission suggests separate policies for commercial coniferous forestry and deciduous.	A0014	The contents of the submission are noted. It is recommended that new policies with respect to forestry, will be taken into account, when preparing the Draft Plan.
xii) Submission maintains that developers often replace felled trees with greater numbers of new trees but that this practice has an adverse impact on dependent flora and fauna.	A0146	The contents of the submission are noted. In some instances, DLR request that Planning Applications resulting in a loss of or impact on trees undertake an Ecological Impact Assessments and provide mitigation measures associated with these to address such impacts if they are identified on site. It is recommended that the requirement for Ecological Impact Assessment as part of larger planning applications, be included in the Draft Plan.
7.1.7 Geological sites		
i) Submission from GSI (Geological Survey Ireland) recommend inclusion of the County Geological Sites within the County Development Plan along with an associated policy.	A0010	The contents of the submission are noted. It is recommended that Policy LHB27: Geological Sites of the current Plan, be reviewed and updated in the Draft Plan.
ii) The submission suggests a new wording for the existing LHB27: Geological Sites.	A0014	The contents of the submission are noted. With regard to access a number are in private ownership with one in use as a commercial quarry so hence a policy to encourage access may not be appropriate. The existing policy already includes a line in relation to access, which was inserted in the current Plan, on foot of a similar submission. It is recommended that Policy LHB27: Geological Sites of the current Plan, be reviewed and updated in the Draft Plan.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
7.2 Open Space		
7.2.1 Parks		
i) Submissions praise the positive work of DLR on parks in the County. Submissions note that the management of existing parks and open spaces is vital to contribute to wellbeing and quality of life and make the County a pleasant place to live.	A0002 A0003 A0026 A0068 A0072 A0079 A0137	The contents of the submissions are noted and acknowledged.
ii) Submission has a specific query in relation to a handrail in St Enda's Park.	A0007	The contents of the submission are noted. St Enda's Park, however, is located in South Dublin County Council and is, therefore, outside the functional area of DLR. <u>This is not a County Development Plan issue.</u>
iii) Submission requests that the Council make available the necessary funding to implement the Shanganagh Park Masterplan 2019 and increase the sporting facilities to cater for the increased demand arising from new population moving into the area. Shanganagh park should be extended out along the Crinken Stream.	A0025	The contents of the submission are noted. The Shanganagh Park Masterplan has now been adopted as the blueprint for the future development of the Park. It seeks to provide a well-designed and robust Park, which will cater for both active and passive recreation. Much emphasis has been placed on the design in catering for both the existing local population and the future residents of planned housing directly adjacent to the Park. The Plan will be implemented over a number of years as finance becomes available. There are no plans to extend Shanganagh Park along the Crinken Stream. It is recommended that the Draft Plan, continues to support recreational amenities.
iv) Submission requests that visual proposals for the future Jamestown park be included within the plan.	A0041	The contents of the submission are noted. A new Masterplan for Jamestown Park is currently being developed to take into account the existing resources in terms of open space and amenity, but also to take into account the surrounding existing and future developments. The intention is that Jamestown becomes a Park for all of the surrounding Communities, including Ballyogan, Clay Farm, and Glenamuck. It is anticipated to have a Draft Masterplan for Jamestown Park for public consultation later in 2020. <u>This is not a County Development Plan</u>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
		<u>issue.</u>
v) Submission suggests that composting facilities are provided in local parks to lead by example.	A0042	The contents of the submission are noted. <u>This is not a County Development Plan issue.</u> This is an operational issue. It is intended that composting facilities will be encouraged and incorporated in Local parks.
vi) Submission requests that Festina Lente serves as a focal point for green / parkland space serving the Old Connaught area.	A0049	The content of this submission is noted. The forthcoming Old Connaught Local Area Plan (LAP), is seen as the appropriate process for addressing this more specific issue. It is, however, noted that the lands in question are in private ownership.
vii) Submissions relate to pocket parks as follows: <ul style="list-style-type: none"> • pocket parks can help improve the mood of an area and provide valuable habitat to promote biodiversity. • Council should set aside funds to create "pocket parks. 	A0056 A0097	The contents of the submissions are acknowledged. DLR welcomes the provision of pocket parks in the County with recent successful examples of such parks in the County i.e. Otranto Park, Bracken Road, Leopardstown Road and in Cherrywood Strategic Development Zone (SDZ).
viii) Submissions request a ban on large scale outdoor events and that the County Development Plan include a policy of not supporting large-scale open-air events in the County's parks in the interests of the biodiversity and climate emergency, the tourism strategy and the heritage of the County.	A0032 A0138	The contents of the submission are noted. It is considered that large-scale open-air events are appropriate in certain Parks as part of the recreational offering of the space. These events must be well organised and licensed, and if correctly managed have minimal effects on local biodiversity or natural habitats. <u>This is not a County Development Plan issue.</u>
ix) Submission considers that the policies underpinning the sustainability award for Fernhill should be implemented in all of the County's Parks.	A0032	The contents of the submission are noted. It is intended that the adopted Sustainability Strategy for Fernhill will be adapted for use in all Parks throughout the County. Many of these are already in place and are adjudicated as part of the annual 'An Taisce Green Flag' award. <u>This is not a County Development Plan issue.</u>
x) Submission requests that the open green spaces	A0070	The contents of the submission are noted.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
around Marsham Court, Kilmacud, continue to be listed as 'open amenity areas on which nothing may be built'.		
xi) Submission raises issue in relation to the weekend markets in Marlay & People's park	A0069	The contents of the submission are noted. <u>This is not a County Development Plan issue.</u>
xii) Submissions contend that Fernhill gardens is a wonderful asset and request that Fernhill Park should be completed.	A0068 A0067 A0069 A0137	The contents of the submissions are noted. This is an operational issue. In relation to Fernhill, the carpark will be completed in Q3 2020 and be available for use soon after. The next phase of Park works will take a number of further years to complete.
xiii) Submission requests Installation of drinking fountains at all sports grounds/ playgrounds.	A0074	The contents of the submission are noted; however, this is an operational issue. <u>This is not a County Development Plan issue.</u>
xiv) Submission supports night time use and access to recreation.	A0100	The contents of the submission are noted. It is Council policy to only provide lighting to areas of Park or Open Space where these areas are required for access to and from public transport or other facilities. Providing lighting to areas within Parks at night can encourage congregations and potentially unsafe situations. It should be noted, however, that there may be some cases in the larger Parks where lighting is provided to All Weather Pitches or other sporting facilities particularly during the winter months.
xv) Submission requests that where references to the making of Masterplans for parks are included in the Development Plan that references be included regarding the engagement of stakeholders in the plan-making process.	A0110	The contents of the submission are noted. Since the adoption of the current Plan the masterplans for both Marlay Park and Shanganagh Park have been completed. It is envisaged that the Masterplans for both Blackrock Park and Cabinteely Park will be completed in the lifetime of the Draft Plan. As the Masterplans are a separate process to the County Development Plan it is not considered necessary to reference the public consultation that is entailed in the making of same.
xvi) Submission recommends that in light of climate and biodiversity crisis the Council need to ensure	A0151	The contents of the submission are noted and welcomed. The Council is developing a policy to encourage the setting up of Community Gardens at appropriate locations throughout the

Key Issue	Sub. No.	Executive's Opinion & Recommendation
that people need to be consumers as well as user of parks and greenways and open space.		County. This would allow for active participation in the growing of food and include other sustainable activities such as composting and beekeeping. It is recommended that this be referenced in the Draft Plan.
xvii) Submissions relate specifically to Blackrock Park and makes a number of suggestions including some on design and accessibility.	A0084 A0132	The contents of the submissions are noted. The level of detail is not relevant to the County Development Plan. The Public consultation on the Masterplan has just closed. The Masterplan will be due for adoption by the end of 2020. It is recommended that the Draft Plan includes an SLO with respect to Blackrock Park.
xviii) Submission states that additional neighbourhood parks are required (in Monkstown and Sandyford for example), to enhance sense of place, provide play and recreational opportunities and enhance biodiversity.	A0079	The content of this submission is noted. There are several existing private (e.g. Belgrave Square) and public (e.g. Dunedin Park and Seapoint Linear Park, Longford Gardens) in the Monkstown area. This is in addition to having the amenity, which is the coast.
xix) The submission states that Council should maintain the existing/older parks in addition to the provision of new parks. Specific reference made to Clarinda Park.	A0078	The contents of the submission are noted. This is a matter for the ongoing Annual Operational Programme and the Park Capital Works Programme. <u>This is not a County Development Plan issue.</u>
xx) Submission recommends that the County should also look at the feasibility of allotments in unused green spaces.	A0132	The contents of the submission are noted. The Council is developing a policy to encourage the setting up of Community Gardens at appropriate locations throughout the County. These would be permitted in the open space zoning. This would allow for active participation in the growing of food and include other sustainable activities such as composting and beekeeping. It is recommended that this be referenced in the Draft Plan.
xxi) Submission requests among other things that all green spaces especially parks to be made into 'no-tech havens' without wi-fi or screens (with the exception of cafes	A0138	The contents of the submission are noted. These items are operational Parks issues. Whereas, it would not be suitable for all Parks & Open Spaces, this could certainly be considered for certain areas within the larger Parks to enhance the connectivity with the natural environment. <u>This is not a County Development Plan issue.</u>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
xxii) Submission welcomes the new park on Hudson Road and suggests that its usage could be substantially enhanced by the creation of an enclosed community garden.	A0139	The contents of the submission are noted. <u>This is not a County Development Plan issue.</u>
7.2.2 Green Infrastructure		
i) Various submissions highlight the importance of Green Infrastructure (GI) and green initiatives and wildlife corridors and highlights their importance in planning, urban realm and health. Submission recommend inclusion of same in the County Development Plan.	A0023 A0054 A0065 A0137 A0083 A0145 A0146 A0151	The contents of the submissions are noted and welcomed. DLR supports and recognises the importance of Wildlife Corridors, Green Infrastructure (GI) and green initiatives. The Biodiversity officer is currently developing a Wildlife Corridor Plan of the County, which will be integrated into the GI strategy and align with the Biodiversity Plan. It is recommended that the Green Infrastructure Strategy, will be updated in the Draft Plan, to include this information.
ii) Submission refers to a Right of Way from Allies River Road to Ferndale Road which is overgrown and puts forward an idea for a walk and cycle way.	A0025	The contents of the submission are noted. A Right of Way (ROW) exists from Ferndale Road to Crinken Lane.
iii) A number of submissions request that various areas in Shankill be incorporated into Shanganagh Park – including Crinken Stream, the Aske and Clontra. (See also section 8 & 9)	A0025 A0050	<p>The contents of the submission are noted. There are no current proposals to extend Shanganagh Park by way of buying privately owned land. In relation to wildlife corridors, the area mentioned in the submissions along the Crinken Stream, will form part of the large and important wildlife corridor (the 'Glendoo' Mountain to 'Shanganagh' Wildlife Corridor) in that area. Allowing public access could unduly and negatively impact on flora and fauna. It is recommended, that these corridors be integrated into the Green Infrastructure Strategy which will be updated in the Draft Plan.</p> <p>The current Plan contains an SLO "To provide pedestrian/cycle access across the M11 corridor at Allies River Road". It is recommended that this be reworded, in the Draft Plan, to allow a pedestrian/cycle way crossing at some juncture between Crinken and Wilford.</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
iv) Submission calls on regular updates to be given on the progress and condition of the Dodder Greenway.	A0097	The contents of the submission are noted. The Dodder Greenway is being designed by Dublin City Council and DLR. It will be subject to public consultation in 2020. <u>This is not a County Development Plan issue.</u>
v) Submission suggests the creation of recreation and leisure amenities along the River Slang.	A0100	The contents of the submission are noted.
vi) Submission from the Department of Culture, Heritage and the Gaeltacht recommends that the DLR GI strategy and county ecological network map is reviewed to take into account the National Biodiversity Action Plan 2017-2021	A0148	The contents of the submissions are noted and welcomed. DLR supports and recognises the importance of Wildlife Corridors, GI and green initiatives. The Biodiversity officer is currently developing a Wildlife Corridor Plan of the County, which will be integrated into the GI strategy and align with the Biodiversity Plan. It is recommended that the Green Infrastructure Strategy, be updated in the Draft Plan, to include this information.
vii) The submission requests that the upcoming development plan includes an objective to support the preparation of a green infrastructure strategy for (UCD Belfield Campus).	A0083	The contents of the submission are noted. Preparation of green infrastructure strategy for UCD is a matter for the College authorities. <u>This is not a County Development Plan issue.</u>
viii) Submission raises concerns around provision of open space in Dundrum.	A0136	The contents of the submission are noted.
ix) Submission states that green spaces are no longer just a visual amenity but play a crucial role in mitigating flood risks, biodiversity, health and education.	A0145	The contents of the submission are noted. The Planning Authority recognises the importance of biodiversity, nature-based solutions and ecosystem services. It is recommended that the Draft Plan, will align with the DLR Biodiversity Plan.
x) The submission suggests new policies and also suggest that the existing Policy OSR 8: Greenways Network, within the current County Development Plan should be edited and replaced by the following;	A0014	The contents of the submission are noted and will inform the Draft Plan. The development of greenways requires careful consideration in terms of their ecological impacts and to ensure that their development does not significantly impact on biodiversity or cause biodiversity net loss. In order to ensure careful design and management of greenways at a County level, a number of objectives will be suggested for inclusion within the Draft Plan, which are in line

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<p>"Support, promote, facilitate and develop a comprehensive network of greenways, linking parks and public open spaces to regional and national Greenway Networks and work with the NTA (National Transport Authority) and adjoining Councils and all stakeholders to develop a co-ordinated approach to the selection, delivering and servicing of future greenway, in order to achieve improve external linkages, to achieve maximum impact and connectivity and to provide alternative routes for pedestrians and cyclists".</p>		<p>with the Strategic Environment Assessment (SEA) Objectives of the Cycle Network Plan for the Greater Dublin Area.</p>
<p>7.3 Recreation</p>		
<p>7.3.1 Sports</p>		
<p>i) Submissions relate to sports facilities as follows:</p> <ul style="list-style-type: none"> • Concern over lack of sports field or sports facilities available in the Dún Laoghaire area. Submission suggest that the current site on Tivoli Terrace South which includes a pitch should be purchased by the Council. • Request for more facilities for teenagers. • Requests that opportunities for disability-specific sports and provision of facilities. • Highlights key role of the GAA (Gaelic Athletic Association). • Requests the inclusion of policy to facilitate flood lighting of sports pitches. • Requests that consideration should be given 	<p>A0017 A0029 A0053 A0077 A0100 A0110 A0138</p>	<p>The contents of the submissions are noted, many are operational issues. The land on Tivoli Terrace South is in private ownership and it is outside therefore outside remit of DLR to provide a pitch at this location. It is recommended, that the other relevant issues be taken into account during the preparation of the Draft Plan.</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<p>to the siting of smaller scale facilities all-weather facilities within residential areas.</p> <ul style="list-style-type: none"> • Requests the inclusion of an "exoskeleton" walking machine and anti-gravity treadmill in all Council gyms. • Requests more recreational gymnastics, sports & activities, green spaces, sea pools. 		
<p>ii) Submissions request various amendments to existing open space policies including that policy 4.2 Open Space and recreation of the current County Development Plan be retained and amended so that the presumption against proposals involving the development of playing fields is expanded to include outdoor sports facilities such as golf clubs.</p>	<p>A0104 A0110</p>	<p>The content of these submissions is noted. It is recommended that the issues will be taken into account during the preparation of the Draft Plan.</p>
<p>iii) Submission notes that policies to increase densification in existing built-up areas and increasing participant numbers will intensify the challenge of ensuring adequacy and capacity of pitches and ancillary facilities.</p>	<p>A0110</p>	<p>The content of the submission is noted. It is recommended that the issues will be taken into account during the preparation of the Draft Plan.</p>
<p>iv) Submission requests the County Development Plan, include specific strategic policy objectives to improve the sports infrastructure in Kilbogget Park.</p>	<p>A0076</p>	<p>The content of these submissions is noted. It is recommended that the issues will be taken into account during the preparation of the Draft Plan.</p>
<p>7.3.2 Playgrounds and Play</p>		
<p>i) Submissions raise a number of issues in relation to</p>	<p>A0001</p>	<p>The content of these submissions is noted and where relevant will inform the preparation of</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<p>play and playgrounds as follows:</p> <ul style="list-style-type: none"> • Complements DLR on playgrounds. • Recommends that a policy be drafted to use natural surveillance to all public places, especially playground areas. • Recommends more play areas and for different ages including adults. • Playgrounds need to be designed with disability and mobility issues in mind. 	<p>A0079 A0097 A0100 A0138 A0146 A0151</p>	<p>the Draft Plan. DLR is moving to a more Nature-based Play philosophy and approach to the provision of Play Opportunities. This involves shifting the emphasis from merely equipment-based provision to using and leveraging the landscape character of outdoor sites in combination with natural elements (e.g. earth sculpting, mounding, ponds, tree trunks). Research on play reveals that this Nature-based approach provides more rewarding experiences and improves health and well-being. It is recommended, therefore, that a more Nature-based Play philosophy and approach to the provision of Play Opportunities will be included in the Draft Plan.</p>
<p>ii) Submission raises various issues including maintenance and improvement in relation to areas in the County used for sea swimming.</p>	<p>A0133</p>	<p>The contents of the submission are noted, however, these are operational issues. There are nine (9) beach and bathing area locations along the County's coast and bathing water quality is monitored. DLR also carry out day to day maintenance at the County's beaches and bathing areas. DLR plan to carry out improvement works at Killiney Beach in the coming year, in addition to improvement works at a number of other locations. <u>This is not a County Development Plan issue.</u></p>
<p>7.4 Biodiversity</p>		
<p>i) Submissions raise various issues in relation to biodiversity as follows:</p> <ul style="list-style-type: none"> • Recognise the importance of biodiversity • Request protection and designation of various habitats. • Request stronger restrictions on herbicide and pesticide use • Request that care be taken of Dargle riparian corridor • Commend DLR for the development of wildlife and insect habitats. 	<p>A0013 A0032 A0036 A0050 A0054 A0056 A0074 A0097 A0100 A0137 A0141</p>	<p>The content of these submissions is noted. DLR fully supports and recognises the importance of biodiversity in its own right and also the ecosystem services it provides including carbon sequestration. DLR have reduced the use of herbicide and pesticides in public parks since 2018. DLR also have areas in parks that have been set aside for wildlife and pollinators. DLR Parks have a 'Slow to Mow' campaign to encourage the public to also create areas for pollinators and wildlife. DLR are partners of the All-Ireland Pollinator Plan and the Council's Biodiversity Officer is a member of the All- Ireland Pollinator Plan Steering Group. All these initiatives aim to support and protect biodiversity in the County. It is recommended that the initiatives, where relevant, will be taken into account during the preparation of the Draft Plan.</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<ul style="list-style-type: none"> • Highlight issues with destroying biodiversity. • Include reference to all Ireland Pollinator Plan • Request additional signage on biodiversity • Request education around biodiversity • Recommend wildflower planting in graffiti hotspots. • DLR should compile a list of 'Local Biodiversity Areas' • Impact of fences in Kilbogget park on Brent Geese • Recognise the unique Biosphere designation • recommendations of the National Biodiversity Plan 2017-2021 should be fully incorporated into the County Development Plan. 	<p>A0146 A0148</p>	<p>In addition, DLR are currently working on an educational toolkit for ecosystem services based upon local ecosystems in the county. DLR provide a biodiversity events programme that involves local ecosystems and species for the public.</p> <p>DLR have been monitoring the geese at Kilbogget over the winter months from November 2019 – March 2020, the geese have continued to use the park and no issue has been reported by the professional ecologist surveying them, in relation to reduced use of the park by Brent Geese.</p> <p>DLR are happy to be a partner of the Dublin Bay Biosphere, a UNESCO designated site. As a partner, DLR have contributed to the management of the biosphere, along with its partners, and are currently working on raising awareness and education to people living, working and using the biosphere, through a Draft Education Strategy. DLR have also developed an Environmental Code of Practice for those working in the Biosphere and all partners carry out conservation actions including gathering biodiversity data and monitoring within the biosphere. It is recommended that the Biosphere policy within the current Plan, be reviewed and updated in the Draft Plan.</p>
<p>ii) Submission supports ecological and wildlife corridors.</p>	<p>A0025</p>	<p>The contents of the submission. DLR supports and recognises the importance of Wildlife Corridors, GI and green initiatives. The Biodiversity officer is currently developing a Wildlife Corridor Plan of the County which will be integrated into the GI strategy and align with the Biodiversity Plan. It is recommended that the Green Infrastructure Strategy, be updated in the Draft Plan, to include this information.</p>
<p>iii) Submission request that the County Development Plan contain policies which reflect obligations under the Habitats Directive.</p>	<p>A0032 A0065</p>	<p>The contents of the submissions are noted and welcomed.</p>
<p>iv) Submission requests that the County Development Plan contain policies to ensure that</p>	<p>A0032</p>	<p>The contents of the submission are noted. DLR work with their parks staff, the local communities, National Parks and Wildlife Services (NPWS) and other wildlife experts to ensure</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
all wildlife in all of the County's parks are undisturbed by unnecessary human activity, noise and lighting particularly during breeding and resting period.		that any disturbances are managed at a level that does not cause significant disturbance to wildlife due to human activities such as noise, lighting etc and this includes during all stages important to wildlife including breeding and resting periods. <u>This is not a County Development Plan issue.</u>
v) Submission calls for efforts to be made by DLR to remove invasive plant species on publicly owned land in an environmentally friendly and biodiversity safe way.	A0097	The contents of the submission are noted. DLR are currently drafting an 'Invasive Species Plan' for the County, which will include actions in relation to invasive species management and treatment. It is recommended that the forthcoming 'Invasive Species Plan' will be referenced in the Draft Plan.
vi) Submission recommends that all new planning applications should be required to be accompanied by a dedicated plan for protection and enhancement of biodiversity.	A0097	The content of this submission is noted.
vii) Submission calls for the Completion of the Biodiversity map for the County.	A0146	The contents of the submission are noted. DLR supports and recognises the importance of Wildlife Corridors, GI and green initiatives. The Biodiversity officer is currently developing a Wildlife Corridor Plan of the County which will be integrated into the GI strategy and align with the Biodiversity Plan. It is recommended that the Green Infrastructure Strategy, be reviewed and updated in the Draft Plan, to include this information.
viii) Submission from the Department of Culture, Heritage and the Gaeltacht: <ul style="list-style-type: none"> • recommends that the plan integrate biodiversity consideration in a positive, proactive and precautionary way, • highlights the positive contributions of greenways to improving sustainable transport and tourism, • recommends the protection of the expanding 	A0148	The contents of the submission are noted. It is recommended that the initiatives, where relevant, will be taken into account during the preparation of the Draft Plan.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
red squirrel population in the Dublin Mountains		
ix) The submission from An Taisce raises concerns in relation to Nutley and Trimleston Streams.	A0065	Water samples from locations along the Trimleston Stream are regularly taken by DLR to assess water quality and to investigate sources of pollution. The Nutley Stream is sampled by Dublin City Council (DCC) as it flows through DCC functional area and only passes through DLR functional area for approximately 300m. This will inform the SEA. <u>This is not a County Development Plan issue.</u>
x) The submission from An Taisce requests DLR to carry out, as resources allow, habitat and green infrastructure mapping of the coastal fringe.	A0065	The contents of the submission from An Taisce are noted. DLR are currently reviewing their habitat mapping including the coastal habitats, which were mapped in 2008. DLR are also developing a 'Wildlife Corridor Plan', which includes the coastal fringe. It is recommended that this be integrated into the Green Infrastructure Strategy and the SEA/AA that forms part of the Draft Plan.
xi) The submission from An Taisce recommends that no election posters should be erected within 50 metres of a Special Protection Area (SPA), Natural Heritage Area (NHA) or SAC (Special Area of Conservation).	A0065	The contents of the submission from An Taisce are noted, however, this issue is a matter for by laws. <u>This is not a County Development Plan issue.</u>

Section 8: Environmental Infrastructure and Flooding

Key Issue	Sub. No.	Executive's Opinion & Recommendation
8.1 Environmental Infrastructure		
8.1.1 Water and Wastewater Infrastructure		
i) Submission from Irish Water sets out the various studies being carried out by Irish Water which will develop solutions to overcome current constraints. Studies include: <ul style="list-style-type: none"> • West Pier Drainage Area Plan (DAP) (2021 completion date), Bray/Shanganagh DAP (2020 completion date) & Dodder Valley DAP (2022 completion date). • the Greater Dublin Drainage project to free up waste water capacity at Ringsend. • the Water Supply Project for the Eastern Region 	A0047	The content of the submission is noted. DLR are actively involved in working with Irish Water in providing all relevant information for the Drainage Area Plans which will inform our SEA (Strategic Environmental Assessment).
ii) Submission recommends SuDS measures to reduce the volume of fresh rainwater being sent to the water treatment plant.	A0056	The content of this submission is noted. There is already a suite of sustainable measures that is required/promoted for all new developments as part of the Council's SuDS and Water conservation policies. It is recommended that these be reviewed and updated as part of the preparation of the Draft Plan.
iii) Submission considers that water management facilities should have been upgraded earlier.	A0081	The content of the submission is noted. This is not a County Development Plan issue. Since 2014 the Council has no direct control over the timing of any upgrades. Such decisions are made by Irish Water and the timing of same is set out in their Capital Investment Plans.
iv) Submission raises air quality issues in relation to the sewerage pipe from Bray to Shanganagh Waste Water Treatment.	A0036	The content of the submission is noted. Irish Water has responsibility for the operation of Shanganagh Treatment plan. This is not a County Development Plan issue.
v) Submission requests that:	A0042	The content of the submission is noted. As combined sewers are Irish Water Assets, the

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<ul style="list-style-type: none"> work is carried out to replace combined sewers complete separation (prior to the sale of the property) is certified 	A0077	removal of surface water from combined systems is a matter for Irish Water. For all new developments it is Council policy that separate systems are provided, at a minimum and where constructible, to the extent of the site boundary. Under the building regulations certification is provided by the project architect/engineer or building surveyor on a site and not the Planning Authority. <u>This is not a County Development Plan issue</u>
8.1.2 Water Quality and Conservation		
i) Submissions calls on the Council to address misconnections.	A0079 A0097	<p>The content of the submissions is noted. <u>This is not a County Development Plan issue.</u> This is an operational issue. The Water Pollution Control Section in DLR has a full-time misconnections team. The team's purpose is to find domestic misconnections in domestic dwellings. The work comprises of walking local streams to see where pollution is entering the stream. This is usually via a pipe. Samples from the pipe are taken and analysed by Dublin City Council Central Laboratory. Manholes on the offending pipe are lifted up the line and lines that contain no clear rainwater are marked for further investigation.</p> <p>Contact is made with residents served by the polluted surface water pipe in question and appointments are agreed to carry out misconnection surveys.</p> <p>The survey involves lifting drain covers, examining pipes and putting dye into toilets or sinks and tracing it to see if it shows that the foul pipe serving the house is "misconnected" into the surface water pipe thereby polluting the local stream. Dwellings that have misconnections are requested to remove the misconnections within an agreed timeframe.</p> <p>In 2019, 1080 misconnections surveys were carried out. Of that number 75 dwellings were misconnected.</p>
ii) Submission raises concerns around drinking water quality and also the need to educate people on water conservation.	A0029	The content of the submission is noted. <u>This is not a County Development Plan issue.</u> Overall water quality is matter for Irish Water.
iii) Submission recommends DLR deal with leakage from pipes in order to improve water	A0013	The content of the submission is noted. Water conservation, including control and management of leakage is a matter for Irish Water. In line with the National Planning

Key Issue	Sub. No.	Executive's Opinion & Recommendation
conservation.		Framework (NPF) and Regional Spatial and Economic Strategy (RSES), it is however recommended that the Draft Plan contain policies which support Irish Water in their role in water conservation and addressing leakage.
iv) Submission requests that sewage overflow during heavy rain events at the West Pier be stopped.	A0042 A0077	The West Pier pumping station is an Irish Water asset. The operational arrangements of the pumping station are a matter for Irish Water. <u>This is not a County Development Plan issue</u>
8.1.3 Environmental Infrastructure - General		
i) Submission: <ul style="list-style-type: none"> highlights that the maintenance of good water quality, air quality, and sustainable waste management should be infrastructure priorities. Submission recommends that the Council should work pro-actively with Irish Water to progress and deliver vital infrastructure projects 	A0129	The Planning Authority would agree with the sentiments of this submission. The Council works proactively with Irish Water across a number of different disciplines to progress enabling infrastructure projects County wide.
ii) Submission from Irish Water notes that projects that are not part of the current Capital Investment Plan 2020 – 2024 may not be completed within the lifespan of the County Plan and would therefore, have to be developer led.	A0047	The statements are noted. It is noted that the Irish Water Capital Investment Plan aligns with the enabling infrastructure required for development areas set out in table 5.1 of the RSES.
iii) Submission recommends that Irelands Second National Energy Efficiency Action Plan to 2020 & Our sustainable future – A Framework for Sustainable Development be taken into account when drafting the plan.	A0054	The content of this submission is noted

Key Issue	Sub. No.	Executive's Opinion & Recommendation
iv) Submission emphasises that adequate drainage, and sewerage must be in place before higher land is developed.	A0145	The Planning Authority would agree with the sentiment of this submission. It is recommended that the Draft Plan contain policies matching development with provision of enabling infrastructure.
v) Submission requests that issues regarding drainage/sewerage in the Rathmichael / Shankill area be resolved as soon as possible.	A0150	The content of this submission is noted. This is a matter for Irish Water. They are however currently progressing the Bray/Shanganagh Drainage Area Plan (DAP) which has a 2020 completion date.
8.1.4 Water and Waste Water – Policies and Objectives		
i) Submission from Irish Water provides suggested policies - for inclusion in the Draft Plan - relating to the following: <ul style="list-style-type: none"> • Water supply and distribution, • Wastewater collection and treatment, • Water quality and groundwater protection. 	A0047	The submission is noted and will inform the policies of the Draft Plan.
ii) The submission from An Taisce recommends a suite of integrated policies in relation to water and waste water so as to ensure compliance with national and European Union (EU) legislation. Planning permission should not be granted to development proposals where there is insufficient cumulative capacity within the relevant wastewater treatment plant	A0065	The content of this submission is noted. Wastewater treatment plant capacity is a matter for Irish Water. The Council will follow the guidance of, and confirmation from, Irish Water on Wastewater treatment plant capacity in its decision-making process. All private wastewater treatment proposals are assessed for compliance with the Environmental Protection Agency (EPA) Code of Practice, other related regulations and County Development Plan policies and objectives.
iii) Submission requests that the County Development Plan includes an objective to support in principle all infrastructure improvements which can reduce energy and water usage.	A0083	Submission is noted and welcomed. It is recommended that the Draft Plan contain policies to reduce water and energy usage.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
8.1.5 Water and Waste Water – Old Connaught		
i) Various submission reference forthcoming enabling water and waste water infrastructure in Old Connaught as follows: <ul style="list-style-type: none"> • Future provision will serve Old Connaught and wider area. 	A0088	The content of this submission is noted. At present there are significant water supply capacity shortcomings in both the Old Connaught area and the wider environs of south DLR and north Wicklow. The Old Connaught-Woodbrook Water Supply and Sewerage Schemes have now been included in Irish Water's 2020-2024 Capital Investment Programme. In relation to the Sewerage Scheme a DAP is currently being prepared for a relatively large area of south DLR (including Old Connaught and the wider environs) and north Wicklow. Foul drainage from the DAP area will drain to the Shanganagh WWTW (Wastewater Treatment Works) which has significant surplus treatment capacity to facilitate the level of growth envisaged for these lands. The Growth Forecast Analysis for the DAP area is due to be completed in 2020. In advance of the DAP being finalised Irish Water are currently investigating the early implementation of a Local Network Reinforcement Project to facilitate a quantum of development on the Old Connaught Local Area Plan (LAP) lands prior to the full build out of the Sewerage Scheme.
ii) Submission raises concerns that the interim Local Network Reinforcement Project for Old Connaught will enable new development rather than allowing existing residents on septic tanks to connect to mains sewerage	A0049	The content of this submission is noted. Capacity constraints for new or existing development on future foul sewerage infrastructure is a matter for Irish Water. Subject to there being no capacity constraints, connections to any new foul sewerage system from an existing development will be subject to the requirements of Irish Water.
8.2 Energy Infrastructure (See Climate Change section for other renewable energy issues)		
8.2.1 General		
i) Submission supports the continuance of Policy EI26 'Energy Facilities' as set out in the current County Development Plan.	A0105	The content of this submission is noted. It is recommended that the Draft Plan review and update policy EI126 in line with the RSES and NPF objectives.
ii) Submission:	A0116	The content of the submission is noted. The NMPF is currently available in Draft form. This

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<ul style="list-style-type: none"> Highlights the importance of sustainable renewable offshore energy projects. Notes that Irelands east coast is a favourable location for the development of offshore wind activities Request that the Draft Plan should include policies relating to the National Marine Planning Framework (NMPF). 		deals with a geographical area different to the County Development Plan and that once this is adopted, where one impacts on the other the County Development Plan will have to have regard to same.
8.2.2 Telecommunications		
i) Submissions express concern about roll out of 5G in the County and its impact on health. A number of links to videos, presentations, case law and research are also submitted along with a legal opinion that concludes that establishing and activating a 5G-network in Denmark would be in contravention of current human and environmental laws due to health impacts.	A0058 A0138	The content of the submissions is noted. The Council has no direct role in the roll out of 5G telecommunications infrastructure. <u>This is not a County Development Plan issue</u>
ii) Submission includes a research which concludes that Wi-Fi technologies should not be used in bedrooms, work spaces, common lounges, hospital rooms, lecture halls, classrooms, and public transport.	A0058	The content of the submission is noted. The Council has no direct role in the provision of Wi-Fi. <u>This is not a County Development Plan issue</u>
iii) Submission states that good internet speeds are still not available in the rural areas of this County.	A0145	The content of the submission is noted. The Council does not have direct control in relation to the provision of Wi-Fi service, however, the importance of same is acknowledged and it is recommended that the Draft Plan review and update current telecommunications policies.
iv) The submission suggests that the existing Section	A0014	The content of this submission is noted. The existing section 8.2.9.9 states that in the

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<p>8.2.9.9: Telecommunications Antennae and Structurers, within the current County Development Plan should be edited and replaced by the following.</p> <p>"Existing Public Rights of Way and established walking routes will be identified prior to any new telecommunication developments (including associated processes) which will be prohibited if they impinge or impact thereon or on recreational amenities or public access to the countryside. Moreover, The Council shall, in assessing an application, take into account the impact on established walking routes".</p>		<p>consideration of proposals for telecommunications infrastructure, applicants will be required to demonstrate impact on rights of way and walking. This was introduced into the 2010 – 2016 plan on foot of a similar submission and was retained in the 2016 – 2022 plan. It is recommended that it be reviewed and updated in the Draft Plan.</p>
<p>v) The submission suggests a new wording for existing Policy EI27: Overhead Cables.</p>	<p>A0014</p>	<p>The suggested policy wording in relation to undergrounding includes the following "<i>Where technically feasible and environmentally appropriate, High Voltage and other powerlines (including existing powerlines) and associated equipment should be placed underground</i>". This is beyond the powers of the Council who can only encourage such undergrounding in line with current policy EI27. The final decision on any undergrounding is made by the relevant statutory undertaker and not the Planning Authority.</p>
<p>8.3 Flooding</p>		
<p>8.3.1 Flood Risk Assessment and Management</p>		
<p>i) Submission from Geological Survey Ireland (GSI) recommends identifying areas for integrated constructed wetlands. GSI recommend using the GSI's National Aquifer and Recharge maps on their Map viewer to this end.</p>	<p>A0010</p>	<p>The contents of the submission are noted and will be considered as part of the review and updating of Appendix 13 (Strategic Flood risk Assessment) as part of preparation of the Draft Plan. A multi-disciplinary approach to the enhancement of existing policies and the inclusion of new policies in relation to wetlands, flood alleviation measures, public access to rivers and riparian/waterway/green corridors is being developed.</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
ii) Submissions draws attention to the role of bogs and nature-based solutions in flood prevention and also the role of wetlands on our coasts.	A0013 A0056	The contents of the submissions are noted and will be considered as part of the review and updating of Appendix 13 (Strategic Flood risk Assessment) as part of preparation of the Draft Plan. A multi-disciplinary approach to the enhancement of existing policies and the inclusion of new policies in relation to wetlands, flood alleviation measures, public access to rivers and riparian/waterway/green corridors is being developed.
iii) Submission recommends the development of further flood defenses along the coast, which could be incorporated into the development of cycle tracks and walkways as part of the Sutton to Sandycove route.	A0026	The contents of the submission are noted and will be considered as part of the review and updating of Appendix 13 (Strategic Flood risk Assessment) as part of preparation of the Draft Plan
iv) Submission from the Office of Public Works (OPW) requests that the new County Development Plan: <ul style="list-style-type: none"> • give a clear commitment to abide by the section 28 Guidelines on Flood Risk. • includes the sequential approach to managing flood risk and the precautionary approach • ensure that flood risk relating to the Loughlinstown Area for Further Assessment (AFA) informs Strategic Flood Risk Assessment (SFRA). 	A0028	The contents of the submission are noted and will be considered as part of the review and updating of Appendix 13 'Strategic Flood risk Assessment' as part of preparation of the Draft Plan. The SFRA is prepared based on the methodology as set out in the Section 28 Guidelines.
v) Submission requests that a plan should address raising the DART line at locations under threat from sea level rise and storm damage	A0042	The content of this submission is noted. <u>This is a matter for Irish Rail and is not a County Development Plan issue.</u>
vi) Various submissions including one from Environmental Health Department, Health Service Executive consider that lands that flood should be	A0054 A0079 A0089	The contents of the submissions are noted and will be considered as part of the review and updating of Appendix 13 'Strategic Flood Risk Assessment' as part of preparation of the Draft Plan.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
zoned appropriately and not zoned for residential development.		
vii) The submission from An Taisce recommends that the County Development Plan must de-zone or down-zone lands categorized in 'Flood Zone A' of 'Flood Zone B' applying the sequential approach.	A0065	The contents of the submission are noted and will be considered as part of the review and updating of Appendix 13 'Strategic Flood Risk Assessment' as part of preparation of the Draft Plan. The SFRA will be prepared having regard to the methodology as set out in the Section 28 Guidelines.
viii) Submissions raise issues associated with rising sea levels including flooding and coastal erosion including as follows: <ul style="list-style-type: none"> • Flooding at Bullock Harbour. • Coastal defence works are vital • Need to work with OPW • Need to identify areas under threat which should inform SFRA • Need for separate ring-fenced funding for protection works • Need to assess whether sea level rise of between 0.5 and 1 metre is still sufficient. • Need to update SuDS and stormwater management plans • Need to consider wave overtopping. 	A0089 A0133 A0139	The contents of the submissions are noted and will be considered as part of the review and updating of Appendix 13 (Strategic Flood risk Assessment) as part of preparation of the Draft Plan. The Council currently work proactively with the OPW on flood relief works and drawing down of funding for works and studies. Climate change and resultant rising sea levels will inform the SFRA.
ix) Submission requests that the Planning Authority review the policy that relates to applications for minor developments in flood zones.	A0099	The contents of the submissions are noted and will be considered as part of the review and updating of Appendix 13 (Strategic Flood risk Assessment) as part of preparation of the Draft Plan.
x) Submission calls for an investigation, in conjunction with central government and	A0139	The content of this submission is noted. Any investigation of whether the building of storm surge barrage in or near Dublin Bay, to be closed during storms to prevent flooding, would be

Key Issue	Sub. No.	Executive's Opinion & Recommendation
neighbouring local authorities, into whether the building of a storm surge barrage in or near Dublin Bay, to be closed during storms to prevent flooding, would be a viable and beneficial option.		a National and Regional project and as such would be not something that a County Development Plan could instigate. <u>This is not a County Development Plan issue.</u>
xi) Submission states that little consideration seems to have been given in DLR to the displacement of large amounts of water due to tree felling and the covering of permeable soil with concrete.	A0146	The contents of the submission are noted. The Council do not agree with this submission as all new developments are required to incorporate Sustainable Drainage Solutions (SuDS) appropriate to the scale of development. Runoff from developments is restricted, in so far as is practicable, to pre-development greenfield runoff rates.
8.3.2 Site Specific Flooding Issues		
i) Submission seeks to extend Shanganagh Park to include land along Allies River Rd. The development of an extensive wetland along the road would mitigate flood risk and augment carbon sequestration.	A0012	Whilst there is no issue with the development of wetlands, the Council would not agree with this submission which proposes extending Shanganagh Park to lands along Allies River Road. This area is separated from the park by a public roadway and is in private ownership. Given open space deficits in other parts of the County there is no robust rational for extending what is already a large regional park.
ii) Submissions refers to flooding on Allies River Road and the lands along the Crinken Stream being designated as a natural flood plain.	A0025 A0051	The content of the submissions is noted. A multi-disciplinary approach to the enhancement of existing policies and the inclusion of new policies in relation to wetlands, flood alleviation measures, public access to rivers and riparian/waterway/green corridors is being developed at a strategic County wide level. See also section 7 – Green County.
iii) Submission notes that flooding on the Dublin Road in Shankill is due to inadequate drainage infrastructure and blocked gullies.	A0050	The content of the submission is noted. This is an operational issue and not a County Development Plan issue. <u>This is not a County Development Plan issue.</u>
iv) Submissions raise localised flooding issues in the following areas: <ul style="list-style-type: none"> • Mill Lane, Shankill. 	A0073 A0077 A0104	The contents of the submissions are noted and will be considered as part of the review and updating of Appendix 13 (Strategic Flood risk Assessment) as part of preparation of the Draft Plan.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<ul style="list-style-type: none"> • DART line, Monkstown • Torquay Road, Gold Lane, Westminster Road and properties adjoining Foxrock Golf Course. • Glasthule/Sandycove • Dundrum Village 	<p>A0136 A0139</p>	
<p>v) Submission notes that a Flood Risk Management Plan for the Old Connaught Areas was prepared by the OPW in May 2018, which includes a Flood Risk Scheme for lands within the Old Connaught LAP boundary. Lands within Old Connaught could be developed prior to these works as they are not within the areas of flooding indicated maps issued by the OPW.</p>	<p>A0088</p>	<p>The content of the submission is noted. While the exact details around the actual implementation of the OPW 2018 Flood Relief Scheme are still pending significant tracts of the residentially zoned lands within the LAP boundary are well removed from flood extent areas shown on the OPW fluvial maps.</p>
<p>vi) Submission requests that the Draft Plan include a specific objective to progress the Loughlinstown flood relief scheme.</p>	<p>A0099</p>	<p>The contents of the submission are noted and will be considered as part of the review and updating of Appendix 13 (Strategic Flood risk Assessment) as part of preparation of the Draft Plan.</p>
<p>vii) Submission references the stream which runs along the southern boundary of the Foxrock Golf Course and expresses concern that this stream is not mentioned in the Draft Plan. Submission requests that the catchment flood risk assessment of the Shanganagh river be extended to the entire river catchment, that all applications in the vicinity carry out flood risk assessments and also that the Council carry out a study.</p>	<p>A0104</p>	<p>The Council have not yet prepared a Draft Plan. The extents of the East Coast Flood Risk Assessment and Management Plan ECFRAM study area within the County of Dún Laoghaire-Rathdown were agreed between the OPW, RPS (Project Consultants) and DLR following the Preliminary Flood Risk Assessment (PFRA) process in 2011. Professional flood risk managers visited all areas being considered as AFAs to validate the findings of the PFRA on the ground. The extent of the Loughlinstown AFA was set at the confluence of the Loughlinstown River with the Ballyogan Stream (to the rear of Beech Park Cabinteely).</p> <p>Notwithstanding the above, the contents of the submission are noted and will be considered as part of the review and updating of Appendix 13 (Strategic Flood risk Assessment) as part of preparation of the Draft Plan.</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
viii) Submission emphasises the need to ensure that flooding does not reoccur in the area of Dundrum village and calls for all possible measures to be taken to minimise the impact of heavy rainfall in the future.	A0136	The contents of the submission are noted and will be considered as part of the review and updating of Appendix 13 (Strategic Flood risk Assessment) as part of preparation of the Draft Plan
8.4 Major Accidents		
i) The submission from the Health Service Executive notes that there are no current Seveso sites in the DLR area.	A0006	The content of the submission is noted. The Council welcome the update with regard to Seveso sites in the County which will inform the Draft Plan.
ii) Submission requests that warnings in relation to climate change, flooding and Coastal Zone Management are fully accessible to people with disabilities.	A0052 A0053	The content of the submissions is noted. Warnings for such events does not fall under the remit of the County Development Plan but is rather a communications issue. <u>This is not a County Development Plan issue</u>
8.5 Pollution		
i) Submission considers that protecting our parks and sea from litter and pollution has to remain central to Council policy.	A0023	The content of this submission is noted and welcomed.
ii) Submission request that a clean air policy is established, specific reference is made to the proposed crematorium in Shankill where greener alternatives, such as a water-based crematorium, are sought.	A0036	The content of this submission is noted. <u>The future operation of same is not a County Development Plan issue.</u>
iii) Submission from the Environmental Health Department, Health Service Executive (HSE)	A0054	Air quality in the County is currently monitored by the EPA in cooperation with DLR. Current measurements give no cause for concern. The Council works with a range of stakeholders to

Key Issue	Sub. No.	Executive's Opinion & Recommendation
suggests that the County Development Plan should aim to reduce polluting emissions into air and increase the quality of air in the County area.		improve provide and promote sustainable forms of transport such as walking cycling and public transport as well as the use of EVs which will have a significant positive impact on air quality.
iv) Submission states that construction in the Stepside area is having a detrimental impact on the environment.	A0069	Construction activity is subject to submitted Construction Management Plans as part of the planning process. The implementation of such plans is monitored by the relevant Council Departments. The current policies will be reviewed as part of the preparation of the Draft Plan.
v) Submission requests that the Council designates areas "clean air zones", where air pollution is discouraged as much as possible.	A0097	Air quality in the County is currently monitored by the EPA in cooperation with DLR. Current measurements give no cause for concern
vi) Submission recommends the installation of air pollution monitors, and exclusion zones for car around schools, creches, colleges and health facilities to reduce air pollution.	A0100	Air pollution monitors are currently installed a number of locations in the County and are monitored by the EPA and TII. No evidence exists to suggest any current requirement for additional air monitoring.
vii) Submission states that noise pollution will be a problem with higher density living.	A0133	The content of the submission is noted. <u>It is recommended that the Development Management section of the plan will be reviewed in this regard.</u>
viii) Submission from the Department of Culture, Heritage and the Gaeltacht recommends that Policy EI23 (to refuse planning permission for any new developments which include an on-site wastewater treatment facility within the Rathmichael area until the groundwater issues in the area are resolved or ameliorated) is retained in the new County Development Plan.	A0148	The observations are noted for consideration as part of the review and updating of Council policies as part of the County Development Plan 2022 -2026 process.
ix) Submission recommends that DLR should liaise	A0151	Air quality in the County is currently monitored by the EPA in cooperation with DLR. Current

Key Issue	Sub. No.	Executive's Opinion & Recommendation
with EPA to measure air quality on Main street Dundrum and make plans if quality exceeds recommended levels of pollutants.		measurements give no cause for concern. The Council works with a range of stakeholders to improve provide and promote sustainable forms of transport such as walking cycling and public transport which will have a significant positive impact on air quality.
8.5.1 Public Lighting		
<p>i) Various submissions relating to public lighting as follows:</p> <ul style="list-style-type: none"> • Consideration should be given to light pollution and investigate ways to reduce over-use of lighting and light pollution. • Recommends that DLR review its lighting practice of replacing lighting with over bright LED lamps and consider their all-night timing in suburban areas. • Requests more restrictions to combat light pollution. • Requests that street lights are switched to LED, and that hoods are placed on lights to direct light on the road only. • Submission request upgrading of lighting at Sandycove. 	<p>A0065 A0072 A0100 A0138 A0139 A0151</p>	<p>The content of these submissions is noted. <u>This is not a County Development Plan issue.</u> There is an ongoing upgrading programme with all street lights in DLR and all new lanterns are LED with full cut-off over 90 degrees. Obtrusive light is an ongoing concern of the Public Lighting Section and all lighting installations are designed to minimise obtrusive light while maximising the light reaching the footpaths and roads in the county. All lighting is designed to EN13201:2015.</p> <p>There is a general reduction of 50% (or more) in real lighting levels from the LED lanterns but as the light produced is a full spectrum light source it allows for 100% of our eye to utilise the light, thus appearing to be brighter even with a large decrease in light levels. The LED lanterns are also dimming between 12 midnight and 6am to further reduce light output in guidance and conformity to the lighting standards.</p>
8.5.2 Waste		
<p>i) Various submissions raise concerns about litter in the County and in specific location including Ballybrack and the area to the north of Booterstown Marsh. Submissions request</p>	<p>A0003 A0018 A0026 A0078</p>	<p><u>This is not a County Development Plan issue.</u> The Councils Litter Management Plan 2018-2020 is a 3-year plan which sets out the Councils policy and actions on litter control. Whilst not a County Development Plan issue, approximately 400 bins are located throughout all areas of the County to provide the optimum service from a finite resource. Bin distribution is</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
additional bins.		concentrated around certain areas and their placement is based on set criteria which prioritises areas close to schools, shops and shopping centres and to a lesser extent around or near some civic amenities. Bin collection are automatically requested via the internal bin telemetry and collection list outputted daily or as required with collection conducted 7 days a week. There is a large problem with illegal dumping of household waste which often leads to blocked or overflowing bins. This problem is endemic in some areas and it is often this illegal behaviour which leads members of the public to think that the services is poor. The area north of Booterstown Marsh is currently undeveloped land and is not in the remit of the cleansing section and is possibly in private ownership. Locally, DLR provide street bins to the area immediately south of this location.
ii) The submission considers that printing as a means of communications should no longer be used.	A0003	The contents of this submission are noted. In this current review and preparation of the new County Development Plan the Council are endeavouring to reduce printed copies of all reports and of the plan. The Council through its Environmental and awareness programmes promotes reduction, reuse and recycling.
iii) Submission considers that there should be stricter rules regarding the separation of waste into streams by retailers. Food retailers should not be allowed to lock the bins used for their expired products.	A0013	<u>This is not a County Development Plan issue.</u> This is currently already governed by National Legislation.
iv) Submission requests that the number of private waste collection companies be reduced thus avoiding congestion.	A0025	<u>This is not a County Development Plan issue.</u> This is currently already governed by National Legislation.
v) Submissions highlight the issues of dog waste as follows: <ul style="list-style-type: none"> • Impact on wheelchair users and • persons with a sight impairment. 	A0053 A0074 A0078	The content of this submission is noted. <u>This is not a County Development Plan issue.</u> This is an operational issue. The Councils six Litter Wardens in conjunction with the Councils Dog Warden carry out daily patrols throughout the County. The Council actively promotes education among dog walkers and the Council has recently installed 'talking lamp-posts' in popular dog walking areas throughout the County, to complement the on-going Green Dog

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<ul style="list-style-type: none"> Requests an increase in the number of dog wardens and/or the installation of dog waste bins 		Walker environmental awareness programme.
vi) Various submissions recommend the introduction of the circular economy approach in relation to waste management.	A0056 A0151	The content of this submission is noted and welcomed. In line with the RSES and the Eastern midland Waste Management Plan 2015 – 20212, it is recommended that the Draft Plan embrace the circular economy approach in relation to water management.
vii) Submission outlines the strategic objectives of the UCD Students' Strategic Vision in relation to waste which centres around reduction and minimisation and recommends that all large planning applications include a waste management Plan.	A0083	The content of the submission is noted. At pre app stage applicants for larger schemes are advised to submit a waste management plan - for both the construction and operational phase of a development - with their planning application.
viii) Submission recommends: <ul style="list-style-type: none"> the use of fast efficient technologies for the composting of food waste. the provision of composting facilities in retail areas 	A0100	<u>This is not a County Development Plan issue.</u> This is currently already governed by National Legislation.
ix) Submission requests more recycling facilities across the County with specific reference to bottle banks within Dún Laoghaire town centre. Opening hours should be longer.	A0133	There are three Recycling Centres and 37 Bring Centres in the County. The number of Recycling Centres is considered to be adequate. Should demand increase waste management would look to provide additional Bring Centres in suitable locations. Bottle Banks are located at the West Pier in Dún Laoghaire.
x) Submission recommends addressing the issue of waste disposal by using underground collection areas so that bins must no longer be left on the street.	A0136	The content of this submission is noted. <u>This is not a County Development Plan issue.</u> Underground tunnelling or any live utility styled collection system for the collection of waste is not currently being considered. Such a system would offer no logistical savings nor would it be feasible.
xi) Submission states that the current solar bins in the	A0139	The contents of this submission are noted. <u>This is not a County Development Plan issue.</u>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
Sandycove/Glathule ACA are unhygienic and should be replaced by bins which can be opened by foot pressure		Currently, the majority of bins in the county are manually opened or hand operated however newer designs of bins now offer pedal actuated systems. Some of these new bins are already in service throughout the county. It is not the intention to replace or upgrade bins ahead of the 'end of life' and that units will only be replaced as and when the need arises.
xii) Submission notes that during the summer Sandycove beach becomes very littered and calls upon the Council to install more bins in the ACA (including some for recycling and food waste) and to have extra collections during peak beach usage times.	A0139	The contents of this submission are noted. <u>This is not a County Development Plan issue.</u> Recycling bins are scheduled for installation at the main beaches during the summer months. These bins will facilitate the collection of only paper and plastics. All food waste will have to go into the normal street bin. Bin collections are conducted as and when required by the automatic telemetry systems contained within the smart bins Additional collections are conducted at and during the high season of business and this will be maintained. The Council's Litter Wardens carry out daily patrols throughout the County.
8.6 Coastal Protection		
i) Various submission made in relation to coastal protection, coastal erosion as follows: <ul style="list-style-type: none"> • Submission considers that environmental infrastructure must be a priority with funding set aside for upcoming climate change emergencies, specifically with regard to protecting the coastal areas. • Submission refers to the flooding of the coastline that caused erosion last December. • Submission requests that a program of coastal protection works incorporates leisure and transport infrastructure such as boardwalks and cycle ways – reference is made to the new Kerry greenway in this regard. 	A0023 A0025 A0036	The content of these submissions is noted. DLR completed a Coastal Defence Strategy in 2010 and that strategy is being used to inform decisions on coastal defence matters. The OPW have initiated a Pilot Coastal Monitoring Survey Programme (PCMS) at a number of selected locations around the country and DLR will be liaising as appropriate with the OPW and Climate Action Regional Office (CARO) on progressing with this pilot programme. The long-term aim of the pilot programme is to assist in the assessment of coastal erosion and other changes in the coastline and to help inform decisions on providing new coastal protection infrastructure and to assess the performance of existing coastal protection infrastructure. It is the intention that DLR will become a part of a wider national programme once the pilot survey has been completed, and this will inform future decisions on coastal management and defence measures in DLR. <p>Regarding the reference to incorporating leisure and transport with coastal protection, this is welcomed. The East Coast Trail is being designed in accordance with the National Cycle Manual. Decisions on exact routings will be subject to EIA, public consultation and a separate</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
		approvals process. Proposed coast defenses north of Bray have allowed for a cycle path in their design. It is recommended that the Draft Plan address coastal protection
ii) Submissions raise site specific coastal erosion Shankill and Corbawn Lane.	A0050 A0072	<p>The content of these submissions is noted. The Council carries out ongoing monitoring of coastal erosion between Woodbrook and Shanganagh, which includes the area of coastline closest to Shankill.</p> <p>Coastal protection works were carried out at Corbawn Lane beach access structure and a section of nearby coastline were completed in June 2019. This project included coastal protection to a section of coastline 180 metres north of Corbawn Lane, approximately in line with the Seafield estate. Part 8 approval was obtained for coastal defence and environmental protection works at the Old Bray Landfill at Woodbrook in 2019 and the detailed design for the works is currently being completed and includes discussions with various stakeholders. It was envisaged that works would commence in mid-2020 and take approximately six months to complete. It must be borne in mind that coastal processes of erosion and deposition are complex, and the material eroded in one location often is essential to protection or as a beach substrate at the location in which it is deposited and care needs to be taken in terms of designing coastal protection works to try and preserve this balance, with due regard for nearby residents, businesses and property. It is recommended that policy on coastal protection be reviewed and updated.</p>
iii) Submission states that coastal erosion will impact on the Sewage Works at Shanganagh.	A0072	<u>This is not a County Development Plan issue.</u> This is a matter for Irish Water.
iv) Submission from the Department of Culture, Heritage and the Gaeltacht seeks a review of the 'Coastal Erosion Strategy, 2010', and rollout of further coastal protection works. In carrying out this review, maintenance of coastal habitats and the ecosystem services they provide should be	A0148	DLR completed a Coastal Defence Strategy in 2010 and that strategy is being used to inform decisions on coastal defence matters. The OPW have initiated a Pilot Coastal Monitoring Survey Programme (PCMSP) at a number of selected locations around the country and DLR will be liaising as appropriate with the OPW and the Dublin Climate Action Regional Office (CARO) on progress with this pilot programme. The long-term aim of the pilot programme is to assist in the assessment of coastal erosion and other changes in the coastline and to help

Key Issue	Sub. No.	Executive's Opinion & Recommendation
taken into consideration.		<p>inform decisions on providing new coastal protection infrastructure and to assess the performance of existing coastal protection infrastructure. It is the intention that DLR will become a part of a wider national programme once the pilot survey has been completed, and this will inform future decisions on coastal management and defence measures in DLR.</p> <p>Any future coastal protections will have due regard to environmental and ecological statutory requirements and accepted best practice.</p>

Section 9: Archaeological and Architectural Heritage

Key Issue	Sub. No.	Executive's Opinion & Recommendation
9.1 Archaeological Heritage		
9.1.1 Protection of Archaeological Heritage		
i) Submission considers that sites that may be of archaeological significance should be preserved in the interest of both future discoveries and visual attractiveness.	A0013	The contents of this submission are noted. In the current Plan, Policy AH1 'Protection of Archaeological Heritage' states that it " <i>is Council policy to protect archaeological sites, National Monuments (and their settings), which have been identified in the Record of Monuments and Places (RMP) and, where feasible, appropriate and applicable to promote access to and signposting of such sites and monuments</i> ". It is recommended that this policy be reviewed and updated in the Draft Plan.
ii) Submission suggests that the current Plan policy AH1: Protection of Archaeological Heritage should be edited.	A0014	The contents of this submission are noted. While the wording of the existing policy is shorter than the policy proposed in the submission, it also allows for the comprehensive protection of archaeological heritage. No change is recommended.
iii) Submission suggests that the current Plan Policy AH5 Historic Burial Grounds, should be replaced by a revised policy, which emphasises the need to protect archaeological/historic graveyards.	A0014	The contents of this submission are noted. It is considered that the wording of the current policy, while shorter than that proposed by the submission, is sufficient to provide for the protection of historic burial grounds. In addition, <u>the maintenance of Council controlled cemeteries is an operational matter and will not be addressed through the Development Plan process.</u>
iv) Submission calls for additional policy aimed at appointing a Heritage Forum to assist the Heritage Officer to deliver the objectives of the Draft Plan with respect to Heritage.	A0014	The contents of this submission are noted. It is the intention of the Council to review the existing Heritage Plan. The existing Dún Laoghaire Rathdown County Heritage Plan 2013-2019 was drawn up with input from a Heritage Forum. It is envisaged that the preparation of an updated Heritage Plan for the County will once again entail the establishment of a new Heritage Forum.
v) Submission calls for additional policy aimed at appointing a Heritage Officer for the County.	A0014	The contents of this submission are noted. <u>The appointment of Council staff is an operational matter.</u>
vi) Submission requests that provision is made for a	A0041	The contents of this submission are noted. <u>This is not a Development Plan issue and may be</u>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
study into the current state of historic Puck Castle and Kilgobbin Castle.		<u>more appropriately addressed as part of the Heritage Plan.</u>
vii) Submission expresses concerns regarding National Monuments now under the guardianship of the State and recommends a pro-active policy of continuous assessment and maintenance in conjunction with private owners, with funding to be provided by the Council if necessary. Submission refers to the Bottle Tower in Churchtown (RMP 022-051), the Lead Mine complex at Ballycorus (026-117), Kilgobbin Castle (025-017001) and Dundrum Castle (022-023).	A0090	The contents of this submission are noted. The Council has no control over national monuments and/or archaeological sites in state ownership. A partnership of the National Monument Services of the Department of Culture, Heritage and the Gaeltacht and the Office of Public Works, looks after the national monuments in State care. However, as specified in the current Plan, Policy AH1: Protection of Archaeological Heritage, <i>"it is Council policy to protect archaeological sites, National Monuments (and their settings), which have been identified in the Record of Monuments and Places (RMP)"</i> . Furthermore, Policy AR6: Protection of Buildings in Council Ownership states that <i>"it is Council policy to continue to demonstrate best practice with regard to Protected Structures, Recorded Monuments and often elements of architectural heritage in its ownership and care"</i> . It is recommended that both of these policies be reviewed and updated in the Draft Plan.
viii) Submission suggests the establishment of heritage trails throughout the County and the incorporation of information boards for ancient sites and monuments.	A0100	The contents of this submission are noted. In the current Plan, Policy LHB17: Trails, Hiking and Walking Routes states that <i>"it is Council policy to promote the development of Regional and local networks of hiking and walking routes/trails and to develop Slí na Sláinte Routes"</i> and that <i>"these should be waymarked/signposted and listed where feasible and appropriate"</i> . The existing County Heritage Plan includes for the provision of an Interpretation Programme which includes information boards and signage in the public realm and printed materials such as maps and trails. The current Heritage Plan informs the Council's policies regarding the preservation of heritage in the County and it is recommended that the Draft Plan have full regard to any update to the current Plan and will also continue its commitment to the development of hiking and walking trails in the County.
ix) Submission from Fáilte Ireland seeks recognition of the strong interdependency between heritage and tourism and the formulation of policies acknowledging and supporting the positive role	A0101	The contents of this submission are noted. It is recommended that the Draft Plan include a more specific reference to the importance of heritage to tourism in Dún Laoghaire Rathdown.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
heritage plays within tourism.		
x) Submission from the Department of Culture, Heritage and the Gaeltacht (DCHG) recommends that a stand-alone dedicated 'Archaeological Heritage' chapter/section is included in the Draft Plan.	D0148	The contents of this submission are noted and will be considered in the preparation of the Draft Plan.
xi) Submission from the DCHG recommends the inclusion of specific objectives relating to archaeology.	D0148	The contents of this submission are noted and will inform the preparation of the Draft Plan.
xii) Submission from the DCHG recommends that a clear definition of 'archaeological heritage' is provided in the Draft Plan.	D0148	The contents of this submission are noted. The introduction to Section 6.1.2 of the current Plan 'Archaeological Heritage' provides a thorough definition of archaeological heritage. It is recommended that this definition be included in the Draft Plan.
xiii) Submission from the DCHG recommends that community led archaeological heritage initiatives and tourism awareness projects are referred to the Department for guidance, particularly with regard to signage.	D0148	The contents of this submission are noted. <u>The activities of community groups in relation to the organising of archaeological heritage initiatives, or of other bodies relating to tourism awareness projects are not under the direct control of the Council.</u>
xiv) Submission from the DCHG recommends that policies for the protection of Underwater Archaeological Heritage are included.	D0148	The contents of this submission are noted. It is recommended that Policy AH6 Underwater Archaeology be reviewed and updated in the Draft Plan.
xv) Submission from the DCHG recommends the inclusion of policies on development proposals which have monuments or sites located in proposed open space within the overall development.	D0148	The contents of this submission are noted. It is envisaged that the retention of the policy approach, (along with the retention of the robust policies on the protection of archaeological heritage in Chapter 6 of the current Plan), is sufficient to ensure that development proposals which have monuments or sites located in proposed open space within the overall development will not result in unacceptable adverse impacts on

Key Issue	Sub. No.	Executive's Opinion & Recommendation
		archaeological or architectural heritage.
xvi) Submission from the DCHG recommends the inclusion of a series of development management objectives including specific requirements expected of a developer/applicant and the planning authority in terms of consulting and assessing applications	D0148	The contents of this submission are noted. It is recommended that this current overall approach to the provision of detailed information to prospective applicants be reviewed and updated in the Draft Plan.
xvii) Submission from the DCHG recommends the inclusion of a list, and maps, of national monuments and sites of archaeological importance	D0148	The contents of this submission are noted. The current Plan includes 14 no. County Development Plan Maps which provide a graphic representation of the proposals contained in the Plan and indicate land use zoning and control standards together with various other objectives of the Council. Appendix 4 to the current Plan consists of the Record of Protected Structures / Record of Monuments and Places / Architectural Areas. The maps will be reviewed as discussion with the DCHG has shown that there are some changes around boundaries and some sites.
xviii) Submission from the DCHG recommends that the Department's Historic Environment Viewer should be consulted in relation to the RMP as well as the location of all known historic monuments within the county	A0148	The contents of this submission are noted. It is recommended that the DCHG's Historic Environment Viewer is consulted during the preparation of the Draft Plan.
9.1.2 Access to Archaeological Sites		
i) Submissions suggest that objectives should be included in the Draft Plan to allow for traditional access routes to be designated as public rights of way. Submissions call for an assessment of the current level of access to archaeology and national monuments and, where possible, calls for support	A0014 A0080 A0090	The contents of these submissions are noted. Dún Laoghaire-Rathdown has a strong track record in displaying rights-of-way on County Development Plan maps and considerable work was done as far back as the 2004-2010 Plan on including rights-of-way. This has carried through to the current Plan and it is recommended that existing rights of way and walking routes will be indicated, where possible, on the Draft Plan maps. The Lissadell House case has however had a bearing on the ability of Local Authorities to include additional rights of

Key Issue	Sub. No.	Executive's Opinion & Recommendation
for partnerships to provide appropriate managed access.		way, as the burden of proof has become very high and rests with the Planning Authority.
ii) Submission requests that conservation does not come at the expense of accessibility and seeks the upgrading of historical sites to improve access for all.	A0053	The contents of this submission are noted. There is a balance to be struck between increasing access to key heritage sites and their protection to ensure that this finite resource is not compromised. All proposals to improve access to historic buildings and historical sites must have regard to the advice set out in Policy AR3 of the current Plan and the DCHG Advice Series 'Access: Improving the Accessibility of Historic Buildings and Places'. This policy will be reviewed and updated as part of the preparation of the Draft Plan.
9.2 Architectural Heritage		
9.2.1 Protection of Architectural Heritage		
i) Submissions request that buildings of genuine historical significance and character should be maintained and that any such buildings that fall into disrepair should be cleaned up and restored.	A0012 A0026	The contents of these submissions are noted. <u>The issue of the disrepair of Protected Structures is not a matter that can be dealt with in the context of the County Development Plan.</u>
ii) Submissions consider that stronger policies should be put in place to prevent protected structures being adversely impacted by inappropriate development in their vicinity.	A0023 A0146	The contents of these submissions are noted. The current Plan includes guidance for development within the context of a protected Structure as set out in Section 8.2.11.2 (iii) Development in Proximity to a Protected Structure. It is recommended that this guidance be retained in the Draft Plan.
iii) Submission requests that the historically significant Countess Markievicz cottage on Blackglan Road is noted in the next County Development Plan.	A0041	The contents of this submission are noted. In the absence of information to the contrary, it is the Planning Authority's understanding that the cottage in question was demolished in the 1970s (Source "On the Borders of the Pale, A History of the Kilgobbin, Stepside and Sandyford area" by Rob Goodbody, 1993). Further confirmation with the author who is a reputable local historian has confirmed that this information is accurate. Any person who makes a submission to have a structure added to the Record of Protected Structures (RPS) should provide supplementary in the form of maps, photographs, any known historical

Key Issue	Sub. No.	Executive's Opinion & Recommendation
		information. This submission does not provide any such information.
iv) Submission calls for the Architectural Heritage Protection Guidelines for Planning Authorities to be implemented in full.	A0065	The contents of this submission are noted. As stated in Policy AR1 of the current Plan, the Council has regard to the DAHG 'Architectural Heritage Protection Guidelines for Planning Authorities' in assessing proposals for Protected Structures. It is intended that this policy be reviewed and updated in the preparation of the Draft Plan.
v) Submission requests that Garden Squares in Dún Laoghaire-Rathdown should be designated as Protected Structures.	A0065	The contents of this submission are noted. Many garden squares in Dún Laoghaire and Monkstown are contained within Architectural Conservation Areas (ACAs) with policies and objectives to protect their special character. This is considered appropriate protection.
vi) Submission calls for an architectural commission to be set up (along the lines of that in South Dublin) in order to locate and preserve built-heritage in the area	A0097	The contents of this submission are noted. Having discussed the format of an architectural commission with South Dublin County Council, it is understood that this is an in-house forum. <u>The establishment of such a forum in DLR would be an operational matter and will not be addressed as part of the Development Plan process.</u>
vii) Submission suggests the incorporation of historical museum spaces in town centres.	A0100	The contents of this submission are noted. Section 8.3 of the current Plan permits the development of cultural uses in areas designated as Major Town Centres. As a result, while the Council does not currently plan on providing historical museum spaces in town centres, the current Development Plan does not preclude the provision of such spaces.
viii) Submission points out that the majority of Victorian architecture, is held in private ownership, that the maintenance and improvement of this heritage is funded privately, and that no public assistance is available. Submission calls for owners to be facilitated by, for example, relaxing parking restrictions.	A0133	The contents of this submission are noted. <u>This is not a County Development Plan issue.</u> Issues such as parking control and skip provision are subject to bye-laws made by the Council in accordance with the Roads and Road Traffic Acts.
ix) Submission calls for Compulsory Purchase Orders to be used by DLR to protect Dún Laoghaire-	A0147	The contents of this submission are noted. <u>This is not a County Development Plan issue.</u>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
Rathdown Town Centre.		
x) Submission requests that current Plan Policy AR5: 'Buildings of Heritage Interest' should be retained in full in the Draft Plan.	A0147	The contents of this submission are noted. It is recommended that this policy be retained in the Draft Plan.
9.2.2 Modern Architectural Heritage		
i) Submissions: <ul style="list-style-type: none"> Request that the Council should consider extending protection to more 20th century architecture. Urge the Council to consider more 20th Century Buildings for designation as Protected Structures or ACAs. 	A0023 A0090	The contents of these submission are noted. In relation to protecting more 20 th Century buildings the current Plan affords adequate protection for the type of buildings through a combination of Polices such as AR5, AR8 and Policy RES4. It is recommended that these policies be reviewed and updated in the Draft Plan. The National Inventory of Architectural Heritage (NIAH) are currently surveying the County to identify structures for inclusion onto the Record of Protected Structures. Any 20th century buildings that are recommended and considered of merit will be brought to the elected members to be considered for inclusion on the RPS.
ii) Submission calls for a more general assessment of modernist buildings and groups of buildings to be encouraged with specific reference to a report on the Architectural/Historic Significance of the U.C.D Campus at Belfield.	A0090	The contents of this submission are noted. All structures of architectural merit and interest within the UCD campus are included on the RPS. Any additional buildings that are identified in subsequent NIAH Surveys will be recommended for inclusion on the RPS.
9.3 Record of Protected Structures (RPS)		
9.3.1 Update of the RPS		
i) Submissions request a comprehensive review of all protected structures as part of the Development Plan review process to determine if their continued inclusion in the Record of	A0072 A0122	The contents of these submissions are noted. The National Inventory of Architectural Heritage (NIAH) are currently surveying the County in phases and, as resources permit, are identifying structures for inclusion on the RPS. It is intended to bring forward all those structures included in the Minister's recommendations for consideration by the elected members for

Key Issue	Sub. No.	Executive's Opinion & Recommendation
Protected Structures is warranted.		inclusion on the RPS.
9.3.2 Proposed Changes to the RPS		
<p>i) Submissions recommend a number of additions to the RPS as follows:</p> <ul style="list-style-type: none"> • Ard na Glaise, Stillorgan Park, Blackrock, County Dublin; • Classon's Bridge and the weir just east of Waldron's bridge at Orwell Park; • All structures in Marlay Demesne as recommended by the Dept of Culture Heritage and Gaeltacht; • Marlay House; and • Beechpark House, Stillorgan. 	<p>A0008 A0027 A0032 A0037 A0065</p>	<p>The contents of these submissions are noted. Any recommendations for the inclusion of a structure on the RPS will be considered against the categories of Special Interest (architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest) as set in the Planning and Development Act, 2000. Any structure, which has one or more of the above categories of special interest, shall be recommended for inclusion on the RPS.</p> <p>It is intended to add the structures recommended by the NIAH Survey and the Minister of the Department of Culture, Heritage and the Gaeltacht onto the RPS as part of the preparation of the Draft Plan.</p> <p>Classon's Bridge and the weir just east of Waldron's bridge at Orwell Park are located within the functional area of Dublin City Council</p>
<p>ii) Submission notes that DLR is examining the content of the NIAH survey as completed by DCHG to date and that additional properties will be included on the RPS. In this regard the submission recommends the following for inclusion</p> <ul style="list-style-type: none"> • Parochial House, Holy Cross Church, Main Street, Dundrum; • Eglinton Hall, Eglinton Terrace, Dundrum; • Former Church of Ireland School and Master's House Eglinton Terrace Dundrum; • 169/171 Lower Kilmacud Road; • The Chief Steward's Lodge, 29 Trees Road Lower; 	<p>A0090</p>	<p>The contents of this submission are noted. Many of the buildings referred to in the submission are covered by the suite of Policies in the current Plan 2016-22, which afford protection to those older buildings which although not Protected Structures are considered to of interest, namely AR8, AR5 and RES4. It is recommended to review and update the above policies in the preparation of the Draft Plan.</p> <p>Those structures within Marlay Park that have been identified by the NIAH survey and recommended by the Minister of Culture, Heritage and the Gaeltacht will be added onto the RPS as part of the preparation of the Draft Plan.</p> <p>Those structures that were previously proposed by the Chief Executive at the amendment stage of the Draft Plan 2016-2022 (withdrawn due to incompatibility and inconsistency in the timeframes for notification), which are considered to still retain their special interest</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<ul style="list-style-type: none"> Marlay Park Farm Complex, Marlay Park Ha-Ha; and Marlay Park Central Pond. 		<p>will be recommended for inclusion onto the RPS as part of the preparation of the Draft Plan.</p>
<p>iii) Submission, which includes a detailed Conservation Report, questions the justification of a room in Chesterfield House being retained on the Record of Protected Structures.</p>	<p>A0122</p>	<p>The contents of this submission are noted. Any structure proposed for removal from the RPS will be assessed using the same procedures for making additions. Recommendations to delete will only take place where the planning authority considers that the structure has entirely lost its special interest.</p>
<p>9.4 Modifications to Protected Structures and historic buildings</p>		
<p>9.4.1 Re-use and Adaptation</p>		
<p>i) Submission requests that no constraints are placed on modifications to properties to facilitate changing needs and technologies.</p>	<p>A0050</p>	<p>The contents of this submission are noted. International charters and conventions have informed and influenced government policy and legislation for protecting the architectural heritage. The various charters require that all interventions respect the physical, historic and aesthetic character and integrity of cultural property. The challenge is to find appropriate ways to satisfy the requirements of a structure to evolve while retaining its character and special interest on the other. DLR is obliged to have regard to Government Policy in the form of the "Architectural Heritage Protection Guidelines for Planning Authorities". This is reflected in the policies and guidance set out in the current Plan. It is recommended that these policies be reviewed and updated in the Draft Plan and amended to reflect any changes in Government Policy.</p>
<p>ii) Submission requests that Section 48 development levies for Protected Structures should be waived to encourage sensitive reuse and adaptation.</p>	<p>A0065</p>	<p>The contents of this submission are noted. <u>The issue of development contribution levies is an operational matter and is addressed under the Council's Development Contribution Scheme 2016-2020.</u> It should be noted however, that this scheme currently provides for an exemption from levies for "<i>renovations to restore/refurbish structures deemed to be Protected Structures in the County Development Plan, where the Council is satisfied that the works substantially contribute to the conservation or restoration of the structure</i>".</p>
<p>iii) Submissions, including one from Fáilte Ireland,</p>	<p>A0072</p>	<p>The contents of these submissions are noted. Policy AR1(iv) and Policy AR5 of the current Plan</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
requests adaptive reuse of existing historic buildings to improve the economic, social and environmental sustainability of a village or a town, and to provide accommodation.	A0101 A0112	support the reuse and refurbishment of Protected Structures and older buildings of heritage merit. It is recommended that these policies be reviewed and updated in the Draft Plan.
iv) Submission states that there should be an onus placed on the local Council to salvage stone from publicly owned lands, with responsibility for this task at the local level.	A0097	The contents of this submission are noted. It is considered that the submission relates to an operational matter which does not fall under the remit of the Development Plan process.
v) Submission suggests that the application of design standards associated with particular uses may need careful consideration and a degree of flexibility to reflect the contents of the need to retain existing features in heritage buildings.	A0112	The contents of this submission are noted. Many Protected Structures are adapted and modified appropriately through the Development Management process. All development proposals are assessed having regard to Council Policy as set out in the current Plan, and the Department of Culture, Heritage and the Gaeltacht's "Architectural Heritage Protection Guidelines for Planning Authorities". It is recommended that these policies be reviewed and updated as part of the preparation process for the Draft Plan.
9.4.2 Energy Efficiency and historic buildings/ Protected Structures		
i) Submission requests that priority is given to insulation and energy efficiency above highest rated heritage status.	A0042	The contents of this submission are noted. There is a need for a balance between the protection of the architectural heritage and the wish to address the issue of energy efficiency. There are Policies and Objectives in the current Plan which address this issue and it is recommended that these be reviewed and updated as part of the preparation of the Draft Plan.
ii) Submission recommends the provision of grants to allow for the retro-fitting of local historical buildings to improve energy efficiency.	A0100	The contents of this submission are noted. This is not a development Plan issue.
iii) Submission states that architectural preservation needs to be weighed against long-term benefits of	A0135	The contents of this submission are noted. The challenge is to find appropriate ways to address the issues raised while ensuring that any measures taken will retain the character and

Key Issue	Sub. No.	Executive's Opinion & Recommendation
actively promoting cleaner energy usage. (specific ref to electric vehicle charging).		special interest of our built heritage. Regard will be had to any changes in policy and guidance that may issue from the Department as part of the preparation of the Draft Plan.
9.5 Architectural Conservation Areas (ACAs)		
9.5.1 Protection of ACAs		
i) Submission recommends that the Draft Plan should seek to designate more Architectural Conservation Areas (ACA)s and Special Planning Control Schemes.	A0065	The contents of this submission are noted. There are 24 no. ACAs and 17 no. candidate ACAs in DLR. The Council will progress the adoption of candidate Architectural Conservation Areas (cACA) and will critically assess additional candidate areas that may benefit from such designations. Under the provisions of Section 84 of the Planning & Development Act, 2000, the Council is not in a position to designate Areas of Special Planning Control.
ii) Submissions request that ACAs be strengthened through a consultation process so as to ensure they are secured for future generations. Submissions call for residents need to be more positively engaged.	A0113 A0133	The contents of these submissions are noted. DLR follows the process for the adoption of an ACA in accordance with Chapter 3 of the DAHG 'Architectural Heritage Protection Guidelines for Planning Authorities'. All of the existing ACAs within the County involved public consultation in accordance with Section 13 of the Planning and Development Act 2000 (as amended).
iii) Submission recommends that objectives and policies are included in the Draft Plan that support the restoration and/or regeneration of sites within ACAs which incorporate appropriate modern elements of the highest architectural design. (Specific ref to Dalkey)	A0119	The contents of this submission are noted. The current Plan includes guidance for new development within an ACA set out in Section 8.2.11.3 (i) New Development within an ACA. This guidance does not prevent modern elements and states " <i>Where development is appropriate, contemporary design is encouraged that is complementary and sympathetic to the surrounding context and scale</i> ". It is recommended that this guidance be reviewed and updated in the Draft Plan.
iv) Submissions call for a coherent and co-ordinated approach to be taken to the improvement, repair and maintenance of ACAs in Dún Laoghaire. Submissions recommends that ACAs in Dún Laoghaire, in particular Clarinda Square,	A0133 A0143	The contents of these submissions are noted. The boundary of each designated ACA is delineated and accompanied by a detailed description of the architectural character and special interest of the area supported by policies and objectives to assist in the future management of the area. Each area designated an ACA has been individually assessed and has its own character appraisal and policy framework document prepared. It is considered that

Key Issue	Sub. No.	Executive's Opinion & Recommendation
Crosthwaite Square, Royal Terrace etc are subject of a conservation campaign to restore them to their original state.		this represents a coherent and coordinated approach to the protection of ACAs and it is recommended that this approach be retained in the Draft Plan.
v) Submission notes that Sandycove Harbour, the adjacent Forty Foot bathing area and The Joyce Tower are located in an ACA and that the area attracts tens of thousands of visitors annually.	A0139	The contents of this submission are noted. The Council recognises the value of Sandycove Harbour and ACA as a resource to the people of the area and of the County as a whole and remains committed to the ongoing protection of the character and special interest of the area.
vi) Submission maintains that overhead electrical and telephone cables represents a visual blight to the entire seafront stretching from the start of Otranto Place to the harbour and calls for more to be done to improve the Sandycove ACA in this regard.	A0139	The contents of this submission are noted. The current Plan includes Policy AR15: 'Public Realm and Public Utility works within an ACA' which states amongst other things that it is Council policy to encourage the undergrounding of over-head services and the removal of redundant wiring/cables within an ACA. It is recommended that this policy is reviewed and updated as part of the drafting process for the Draft Plan.
9.5.2 Proposals for Additional ACAs		
i) Submission includes the following for consideration as ACAs: <ul style="list-style-type: none"> • Group of buildings at Dundrum Village Crossroads; • Nos. 1--3 Glenville Terrace, Nos. 4-5, 8- 10, Nos. 14-15 Pembroke Terrace, Main Street, Dundrum; • Ivy Grove (No. 1), Eglington House (No. 2), Eglington Lodge, Eglington Terrace; • Upper Kilmacud Road, east of Luas Line; • Nos. 1-2 Sydenham Place (north side), 'Herberton and Overton (south side); 	A0090 A0151	The contents of these submissions are noted. Many of buildings/areas referred to in these submissions are covered by the suite of Policies in the current Plan 2016-22, which afford protection to those older buildings which although not Protected Structures are considered to be of interest – namely policy AR5, AR8 and RES4. It is recommended to review and update the above policies in the Draft Plan. The Planning Authority will consider the boundaries of the existing Dundrum Village Crossroads cACA to determine if these should be amended and extended as part of the preparation of the Draft Plan. Mount Merrion was proposed as an ACA during the review of the last current Plan, this was debated and considered that it was ultimately deemed not to merit this designation. These buildings are covered by existing Policy AR8: Nineteenth and Twentieth Century Buildings,

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<ul style="list-style-type: none"> Belmont House, Monte Vista, Cullenagh, Stoney Road; Mount Merrion Estate; and Nos. 1, 15 Ballinteer Gardens, No. 1 Mayfield Terrace. 		<p>Estates and Features and Policy RES4 which states “...the Council will encourage the retention of existing houses that, while not Protected Structures or located within an ACA, do have their own merit and/or contribute beneficially to the area in terms of visual amenity, character of accommodation type - particularly those in areas consisting of exemplar 19th and 20th century buildings and estates”</p>
ii) Submission requests that Marlay Park be declared an ACA.	A0093	The contents of this submission are noted and will be considered as part of the preparation process for the Draft Plan.
9.5.3 Heritage of Specific Areas		
i) Submission requests that the character and heritage of the historic buildings and features within UCD Campus are protected.	A0083	The contents of this submission are noted. All structures of architectural merit and interest within the UCD campus are included on the RPS. Any additional buildings that are identified in subsequent NIAH Surveys will be recommended for inclusion on the RPS.
ii) Submission states that the drafting of a new Development Plan provides an opportunity to highlight Dalkey's status as the only Heritage Town in the Dublin region and that Dalkey should be granted a special historic/heritage town designation with supports available for events.	A0080	The contents of this submission are noted. Chapter 6 of the current Plan includes Policy AH3: Protection of Historic Towns which states that “it is Council policy to promote and protect the Historic Town of Dalkey...” It is recommended that this policy and the associated supporting text in Section 6.1.2 of the current Plan be reviewed and updated in the Draft Plan.
iii) Submission calls for a fundamental review of the role of the Dalkey Heritage Centre, as it no longer functions as a community resource but has an exclusive focus on tourism.	A0080	The contents of this submission are noted. <u>The overall management and day to day operations of facilities which are part funded by DLRCC (in this case the Dalkey Heritage Centre), are operational matters and do not fall under the remit of the Development Plan.</u>
iv) Submission states that the history of Bullock is not adequately discussed in the Have Your Say Document. Submission also requests information as to the status of the Masterplan for Sandycove	A0089	The contents of this submission are noted. The Draft Masterplan is intended as a non-statutory guide to the potential future use and enhancement of Harbour Lands in public ownership or control, as well as providing context and guidance for the future functions of both places. The public consultation period for the Draft Masterplan was from 9th July to 19th

Key Issue	Sub. No.	Executive's Opinion & Recommendation
and Bullock and looks forward to its finalisation.		August 2019, with all submissions made within this time period being taken into consideration by the Council, prior to the publication of the final Masterplan later in 2020.
v) Submissions argue that it is vital that the heritage of the county is preserved, and in particular the village character of Dundrum.	A0090 A0136	The contents of these submissions are noted. There is a suite of Policies and Objectives in the current Plan which address the issues raised in this submission. It is considered that in combination, policies AR5, AR8 and RES4 provide sufficient protection for the buildings referred. It is recommended that these Policies be reviewed and updated in the Draft Plan.
vi) Submission states that pending the adoption of the proposed Local Area Plan (LAP) for Dundrum, it is not clear how features of the Urban Framework Plan Section particularly in relation to reuse of historic building are to be revisited and requests the retention of certain elements in the Draft Plan.	A0090	The contents of this submission are noted. Pending the preparation of the Dundrum LAP the Dundrum Urban Framework Plan (UFP) will be reviewed and updated as part of the Draft Plan preparation process.
vii) Submission makes the case and requests that the Ardilea locality be identified as a 'Character Area'. It is suggested that a specific objective may be put in place which would require that consideration of residential amenity in the Ardilea locality would have regard to the garden suburb and sylvan setting. It is further proposed that the specific objective would ensure that the cumulative impact of proposals would not allow the dilution of the character area.	A0102	The contents of this submission are noted. It is not considered appropriate that the Ardilea locality be identified as a 'Character Area'. There is no legal definition of the term 'character area'. Dún Laoghaire-Rathdown is predominantly a suburban County with a wide variety of residential estate types throughout. Many are similar to Ardilea - Rowanbyrn in Deansgrange and Hainault in Foxrock to name but two - characterised by having a relatively wide separation distance between the site boundaries and the road and extensive boundary planting which all lends to the promotion of a sylvan setting. Many of the properties have changed and evolved over time as individual home owners have replaced boundaries and extended properties. The current Plan included a number of policies relating to proposed development of extensions which are not exempted development. It is recommended that that these policies be reviewed and updated in the Draft Plan.
viii) Submission states that there are inconsistent references in the current Plan to Dalkey as a 'village' and a 'town'. It is submitted that the	A0119	The contents of this submission are noted. Dalkey is not referred to as a village in the text of the current Plan. It is however, specifically referred to in Section 6.1.2.3 as a Historic Town. This section includes Policy AH3: Protection of Historic Towns which states that " <i>It is Council</i>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
matter should be clearly resolved in the forthcoming Plan to reflect Dalkey's status as a Heritage Town.		<i>policy to promote and protect the Historic Town of Dalkey...</i> ". The current Plan goes on to include additional commentary on the need to protect town's archaeological and architectural heritage. It is envisaged that this policy approach will be retained in the Draft Plan.
ix) Submission includes a presentation on the history and development of residential garden squares in Dún Laoghaire.	A0143	The contents of this submission are noted. The Council welcomes the additional detailed information provided as part of the submission as to the significance of garden squares in both Dún Laoghaire and further afield.
9.6 Miscellaneous		
9.6.1 Public Use of Heritage Sites		
i) Submission requests that the Council take ownership of Aske House and Clontra House to be used cultural and social activities.	A0025	The contents of this submission are noted. The Council taking into ownership two privately owned dwellings is not a County Development Plan issue. (See also Green County).
ii) Submission requests that concerts should not be held in the historic core land of Marlay House Demesne. Concerts during the breeding and nesting season are impacting on wildlife.	A0065	The contents of this submission are noted. It should also be noted that the day to day operation of the park as well as the organisation of individual concerts is an operational matter managed by the Council's Parks Department and will not be addressed as part of the Draft Plan preparation process.
iii) Submission requests that historic buildings in Council ownership should be opened up for public access on a much greater basis than exists at present.	A0080	The contents of this submission are noted. The current Plan contains Policy AR6: Protection of Buildings in Council Ownership which states that " <i>it is Council policy to continue to demonstrate best practice with regard to Protected Structures, Recorded Monuments and often elements of architectural heritage in its ownership and care</i> ". While public access to historic buildings in Council ownership is positive in principle, this must be balanced by the need to have regard to specific issues which necessarily limit such access (such as public health and safety, resource allocation and staffing, security, insurance costs, as well architectural conservation). As all of these considerations must be considered on a building by building basis, it is not considered appropriate to include an overarching policy relating to access to public buildings in the next Development Plan.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
iv) Submissions request the inclusion of policies and additional information relating to the use of historic houses in the County including Cabinteely House, Marlay House, Shanganagh Castle and Fernhill House.	A0080 A0090	The contents of these submissions are noted. Section 4.2.2 of the current Plan notes that Cabinteely and Marlay House, which are situated in regional parks, will continue to be refurbished and available for tours and other activities. The Master Plan for Fernhill provides for Fernhill House to be restored for community use. The Draft Master Plan for Shanganagh Park and Cemetery identifies a creche and coffee shop as indicative future uses for Shanganagh Castle. It is envisaged that the policy approach outlined above will be retained in the Draft Plan.
9.6.2 Stone Cleaving and Masonry		
i) Submission seeks greater recognition of the archaeological heritage role of the County's mountains and the associated stone cleaving, quarrying and masonry traditions, specifically along Ballinteer Road.	A0039	The contents of this submission are noted. The Council will consider the addition of additional text to the Draft Plan to recognise the stone cleaving, quarrying and masonry traditions in Dún Laoghaire-Rathdown.

Section 10: Development Management

Key Issue	Sub. No.	Executive's Opinion & Recommendation
10.1 Residential Development		
10.1.1 Development Management – General		
i) Submission. Submission sets out a series of specific requirements relating to future development at Woodbrook and Shanganagh	A0025	The Woodbrook Shanganagh Local Area Plan (LAP) covers detailed policy on development in the area.
ii) Submission states that the next County Development Plan must provide a one-stop shop for residents who need to identify what the development management policies and objectives are that apply to new development.	A0102	The contents of the submission are noted. It is acknowledged that there have been a number of significant policy updates since the adoption of the current Plan in 2016. It is recommended that the Draft Plan, includes all relevant policies and objectives with respect to Development Management, which will be reviewed and updated in line with all National, Regional and Local policy guidance.
iii) Submission seeks an immediate variation to the current County Development Plan in order to take account of national planning policy and statutory planning.	A0102	The contents of the submission are noted. The Planning Authority does not agree with this submission. It is not recommended, to commence a variation process, while a review process, which is taking into account new policy, is ongoing.
iv) Submissions suggest: <ul style="list-style-type: none"> • A number of requirements/standards to be submitted by developers as part of planning applications for high density residential infill schemes. • A minimum quantum of self-catering facilities in education campus and student accommodation. • Policies indicating that buildings in rural areas should have no impact on rural character. 	A0014 A0083 A0102	The contents of the submission are noted. The current Plan includes policy requirements for high density residential development (Policy Res3: Residential Development and Section 8.2.3 Residential Development) and for infill development (Section 8.2.3.4 Additional Accommodation in Existing Built-up Areas (vii) Infill), for school development (Section 8.2.12.4 School Development) and for rural development (Section 8.2.3.6 Rural Housing). It is recommended that these policy requirements be reviewed and updated, where necessary, in the Draft Plan.
v) Submission suggests that all planning applications	A0102	The intention is to prepare a regional Housing Need and Demand Assessment (HNDA). The

Key Issue	Sub. No.	Executive's Opinion & Recommendation
for multi-unit residential developments should be accompanied by a local housing need assessment framed within the regional Housing Need and Demand Assessment (HNDA).		usefulness and practicality of carrying out of a local HNDA is questionable given the proposed methodology as set out in the National Planning Framework (NPF). It should be noted however, that at the time of issue of this Chief Executive Report, the Draft Section 28 Guidelines on the HNDA, have not been published.
vi) Submissions support subdivision of houses into multiple homes.	A0097 A0100	The contents of these submissions are noted and welcomed. Policy RES4: Existing House Stock and Densification of the current Plan, actively promotes and facilitates "conversion of existing housing stock to accommodate a larger number of households - principally by subdivision of larger-than-average family houses - in well serviced urban areas". It is recommended that this policy objective will be reviewed and updated in the Draft Plan.
vii) Submission notes that construction work on rock is difficult and noisy and has the potential to impact negatively on the elderly and the very young.	A0146	The contents of the submission are noted. These issues are taken into account in Construction Management Plans, that are submitted as part of any major planning application.
viii) The submission suggests that the existing Section 8.2.7.5: Fencing of Hitherto Open Land, within the current County Development Plan should be edited and replaced by new text. The submission also requests that barbed-wire will not be used for the top line of wire.	A0014	The contents of the submission are noted. A similar submission was made during the review of the current Plan. While the suggested wording is noted, it is considered that the wording with respect to Section 8.2.7.5 Fencing of Hitherto Open Land, of the current Plan, provides sufficient guidance with respect to this issue. Notwithstanding this, it is recommended that policies and objectives contained within the current Plan will be reviewed and updated, where appropriate, as part of the Draft Plan.
10.1.2 Qualitative Standards		
i) Submissions seeks the promotion of air drying of laundry in housing where this has not been provided for in the past, i.e. in apartment blocks.	A0042	The contents of the submission are noted. The Design Standards for New Apartments, Guidelines for Planning Authorities, 2018, Private Space requirements Section 3.3.7 states that " <i>It is preferable that balconies would be primarily accessed from living rooms, although larger apartments may include wrap around and/or secondary balconies, which should also include a screened clothes-drying space</i> ". The following Section of the Guidelines, Communal Space Section 4.5 also states, " <i>Communal rooms may be provided in apartment schemes, particularly</i>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
		<i>in some larger developments. For example, communal laundry facilities and for drying clothes may be provided in well-ventilated areas". It is recommended that regard be had, to the Design Standards for New Apartments, Guidelines for Planning Authorities, 2018, when reviewing the requirement for Apartment Developments in the Draft Plan.</i>
ii) Submission requests that green walls and rooftop gardens are included in designs.	A0056	The contents of the submission are noted and welcomed. Section 8.2.8.3 Public/Communal Open Space – Quality (v) Green Roofs, of the current Plan, encourages the use of Green Roofs as part of an integrated approach to the provision of green infrastructure". DLR will be updating the existing 'Green Roof Policy' and including a 'Green Roof and Blue Roof' policy as part of the review process. It is recommended that this will be included within the Draft Plan.
iii) Submissions requests: <ul style="list-style-type: none"> • Building with timber-frames as timber-building is more sustainable, low-carbon and economical. • Two-lifts externally built and wired 'safe for use in fire' in buildings. • Accessibility for all within all building types. 	A0097 A0138 A0140	The contents of the submission are noted, however this issue falls outside the remit of Planning and relates to Building Regulations. <u>This is not a County Development Plan issue.</u>
iv) Submission states that DLR should facilitate the conversion of over the shop units for residential purposes.	A0097	The contents of the submission are noted. Policy RES4: Existing House Stock and Densification, of the current Plan, actively supports, 'Living-Over-the-Shop' schemes. It is recommended, that this policy objective will be retained in the Draft Plan.
v) Submission calls for new housing to be built with better ventilation, and the goal of retaining 45kwh per square meter, each year.	A0097	The contents of submission are noted, however, this issue falls outside the remit of Planning. Building ventilation is covered under separate legislation i.e. Building Regulations Technical Document F, 2019. This is not a County Development Plan issue.
vi) Rainwater harvesting should be a mandatory requirement for all new buildings.	A0097	The contents of the submission are noted. Rainwater harvesting is one of a suite of Sustainable Drainage Systems (SuDS) measures that is required/promoted for all new developments as part of the Council's SuDS and water conservation policies. It is

Key Issue	Sub. No.	Executive's Opinion & Recommendation
		recommended, that this sustainable measure will be promoted in the Draft Plan.
vii) Submission recommends that all new planning applications should be accompanied by a dedicated plan for biodiversity, new developments should be encouraged to use native species and such measures could be encouraged through financial incentives.	A0097	The contents of the submission are noted. Section 4.1.3 of the current Plan relates to Biodiversity and the protection and enhancement of biodiversity within the County. It is recommended that this Section be reviewed and updated as part of the Draft Plan.
10.1.3 Apartment Development		
i) Submissions state: <ul style="list-style-type: none"> • Apartments need to be spaces that people want to have as forever homes. • House/apartment developments should reflect the needs of the community. • Raises concerns over maintenance • Considers that the proportion of 3 bed apartments is far too low 	A0056 A0068 A0072	The contents of the submission are noted. Current Plan policies have been superseded by The Design Standards for New Apartments, Guidelines for Planning Authorities, 2018, with respect to unit mix, apartment sizes, open space, etc. Planning Authorities must have regard to these guidelines when assessing planning applications, unless a HNDA, prepared by the Council indicates otherwise. Given the current lack of guidance in relation to the preparation of the HNDA, and also the fact that DLR wishes to prepare one on the regional basis, this information may not be available to inform the Draft Plan. A building lifecycle report is required, to be submitted, as part of each planning application for an apartment scheme. However, the maintenance and upkeep of private apartment developments, is outside the remit of the Planning Department, and is the responsibility of the Management Company of each respective private apartment development. <u>This is not a County Development Plan issue.</u>
10.2 Transportation		
10.2.1 Car Parking		
i) Submissions states: <ul style="list-style-type: none"> • That minimal urban car parking standards 	A0055 A0097	The contents of the submission are noted. The issue with respect to car parking standards, provision and location of car parking, is being reviewed and updated in the preparation of

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<p>should not apply in Mount Merrion.</p> <ul style="list-style-type: none"> • Creation of 'car-less zones' and 'exclusion zones', around schools and improved pedestrian safety. • Reduced speed limits around schools. 		<p>the Draft Plan.</p> <p>The issue raised with respect to speed limits however, is not a County Development Plan issue.</p>
10.2.2 Electric Vehicles		
<p>i) Submissions:</p> <ul style="list-style-type: none"> • Support parking standards that will set minimum levels of parking for electric vehicles. 	<p>A0100 A0105</p>	<p>The contents of the submission are noted. The requirements for electric vehicle (EV) charging are covered in Section 8.2.4.12 of the current Plan. In this regard, it should be noted that EV parking requirements is evolving and will be covered in the Building Regulations further to the completion of public consultation and adoption. Part L of the Building Regulations (which transpose the Energy Performance of Buildings Directive EU/2018/844 (EPBD), sets out the requirements for enabling and/or ducting for EV charging for both residential and non-residential dwellings and for new builds and retrofits. It is recommended that policy in respect to same be reviewed and be updated as part of the Draft Plan.</p>
10.3 Open Space		
10.3.1 Quantitative Standards		
<p>i) Submission suggests that the public open space requirement of 15 to 20sq.m per person for new residential development militates against the need to provide for compact growth.</p>	<p>A0112 A0124</p>	<p>The contents of the submission are noted. DLR welcomes the need to provide for compact growth in the County, however, the provision of adequate open space will contribute to the amenity needs of residents and thereby all new developments will be encouraged to provide adequate open space to serve the proposed development. It is recommended that the current Plan policy will be reviewed and updated as part of the Draft Plan.</p>
<p>ii) Submission supports the application of a standard for the provision of open space on a per capita basis, based on occupancy rates relating to the number of bedrooms. Recommendations are</p>	<p>A0110</p>	<p>The contents of the submission are noted. It is acknowledged that the open space per capita calculation for residential/housing developments will provide future occupants and communities with adequate active recreational and leisure opportunities. It is recommended that the current Plan policy will be reviewed and updated as part of the Draft Plan.</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
made regarding any shortfall in open space provision including support for the payment of a financial contribution in lieu of open space on site.		
iii) Submission suggest that the term public open space should not be used to include communal space within apartment developments.	A0151	The contents of the submission are noted. Section 8.2.8 of the current Plan states that Open Space is considered to be public, communal and private space which has been 'conditioned' by way of a grant of planning permission to serve the needs of the local population". Public Open Space generally derives from a development that is defined as being generally freely available and accessible to the public and has, or is intended to be, 'taken-in-charge' by the Local Authority", whereas, Communal Open Space is intended to be made available to a set group of residents only and would ordinarily be maintained by a Management Company". In order to differentiate and assess the quantum of open space provided for residential developments, it is recommended that both terms are retained in the Draft Plan.
iv) Submission recommends that the forthcoming County Development Plan sets minimum open space standards at a neighbourhood level and that roof gardens should not count as communal open space.	A0151	The contents of the submission are noted. In some instances, where residential development is proposed in an urban context, i.e. a small infill scheme within a Major Town Centre, the opportunity to provide communal open space for the residential scheme may be limited. In this case relaxed standards may be considered acceptable and the use of roof gardens is welcomed as a form of communal open space to serve the scheme. These developments, however, would be site specific, and assessed on a case by case basis, in the absence of a dedicated area of public or communal open space. It is recommended, that the Draft Plan states that roof gardens, would not normally count towards open space, and clearly outline the exceptional circumstances that would allow them to be included.
10.3.2 Open Space - Other		
i) Various submissions raise concerns about open space to serve high density schemes.	A0074 A0082 A0097	The contents of the submission are noted. It is recommended that the issue with respect to the provision of amenity including open space be reviewed in the Draft Plan.
ii) Submission recommends the provision of play	A0100	The contents of the submission are noted. It is recommended that the submission will inform

Key Issue	Sub. No.	Executive's Opinion & Recommendation
areas for both children and adults within 15 minutes of all residents.		the preparation of the Draft Plan, with respect to play provision.
10.4 Retail		
10.4.1 Advertising		
i) Submission recommends a new approach to the delivery of outdoor advertising. Significant, underutilized value exists in the public domain of the County which, if well managed could have positive impacts on the street environment.	A0004	The contents of the submission are noted. The recommendation for a new approach with respect to outdoor advertising is welcomed and reference will be made to other locations (i.e. both Ireland and Europe) when considering the policy, in this regard. The contents of this submission will be considered, where appropriate, during the preparation of the Draft Plan.
ii) Submission recommends that the plan include a more tailored outdoor advertising policy which addresses digital formats and is separate to shopfronts and signage.	A0063	The contents of the submission are noted and welcomed. DLR acknowledges that the advertising world is moving at pace with new forms of advertising coming to the forefront i.e. digital advertising that has not been included in the current Section 8.2.6.8. Shopfronts, Signage and Advertising of the current Plan. The contents of this submission will be considered, where appropriate, during the preparation of the Draft Plan.
iii) Submission request introduction of advertising controls along Blackthorn Drive.	A0098	The contents of the submission are noted. The purpose of the County Development Plan is to provide guidance with respect to development in the County, in the case of this submission, advertising and signage. The existing plan refers to both 'excessive signage' at locations and 'visual clutter' resulting from signage proposals, which is assessed at planning application stage. In this regard, any proposal for signage along Blackthorn Drive will be assessed against County Development Plan policy, the visual amenities of the adjoining areas and the proper planning and sustainable development of the area. It is not appropriate to include advertising control measures, for certain locations, and therefore, this will not be recommended in the Draft Plan.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
10.5 Environmental Infrastructure		
i) Submission requests that an acceptable standard of construction management plans, with input from local residents, are sought and enforced for large developments.	A0055	The contents of the submission are noted. Construction Management Plans (CMPs) are submitted at planning application stage for large schemes. There is no legislative capacity for local residents to input into the formulation of the construction management plans, but local residents can and do make submissions to the planning authority on any planning applications and on details relating to the CMP. In recent time, on some very large construction schemes in the County, the applicants have been conditioned to provide a community liaison officer, who liaises with the local community, on matters relating to construction. The Enforcement Section of the Council deal with any noncompliance issues.
ii) Submission requests that existing facilitating infrastructure and services are upgraded to facilitate new development in existing areas and should be funded through development levies.	A0055	The contents of the submission are noted. DLR apply Development Contributions on planning applications to facilitate the upgrade and improvement of infrastructure and services in the County.

Section 11: Strategic Environmental Assessment (SEA) & Appropriate Assessment (AA)

Key Issue	Sub. No.	Executive's Opinion & Recommendation
11.1 Strategic Environmental Assessment (SEA)		
<p>i) Submission from Geological Survey Ireland (GSI) recommends the consideration of mineral resources and potential resources as a material asset. GSI's National Aquifer should be used in the Strategic Environmental Assessment (SEA) of the County Development Plan.</p> <p>The GSI's Geothermal Suitability maps should be used in considering sustainable development and growth elements of the County Development Plan and associated environmental assessments and with regard to the national climate action plan.</p> <p>GSI's National Aquifer mapping should be used in the Strategic Environmental Assessment (SEA) of the County Development Plan.</p>	A0011	<p>The contents of this submission are noted and will inform the content of the SEA where relevant. Mineral resources will be recognised as a material asset by the SEA.</p> <p>Aquifer productivity and vulnerability mapping will be included in the SEA Environmental Report and the SEA will reference datasets available from GSI that may be useful to lower-tier project planning, including those relating to Aquifer Productivity, Aquifer Vulnerability, Bedrock Geology, Quaternary Geology, Mineral deposits, Groundwater Resources and Geohazards, such as Landslide Events and Landslide Susceptibility Mapping.</p> <p>Regarding geothermal energy, SEA considers the environmental effects of Plan policies and objectives – including any provision for geothermal energy. Potential environmental effects arising from geothermal energy may include contributions towards greenhouse gas emission targets and effects on water quality, ecology, soil stability. Inclusion of Geothermal Suitability mapping is not within the scope of the SEA, however where it forms part of Plan policies/objectives, it would be considered by the SEA.</p>
<p>ii) Submission requests that the SEA prioritise green space, biodiversity and the development of managed wetlands.</p>	A0012	<p>The contents of this submission are noted. The SEA will consider the issues of green space, biodiversity and wetlands.</p>
<p>iii) Submission from the Environmental Protection Agency recommends that DLR takes the following into account:</p> <ul style="list-style-type: none"> • 'SEA of Local Authority Land Use Plans – EPA Recommendations. • EPA AA GeoTool Our AA GeoTool application which has been developed in partnership with the NPWS. 	A0019	<p>The contents of this submission are noted. The cited documents and tools will be considered throughout the Plan-preparation/SEA process. The Plan will align with relevant plans and programmes including the National Planning Framework, the Regional Spatial and Economic Strategy for the Eastern and Midlands Region and those relating to climate mitigation and adaptation.</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<ul style="list-style-type: none"> • Ensure that the Plan aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework and the Regional Spatial and Economic Strategy for the Eastern and Midlands Region. • In terms of the Transition to a low carbon climate resilient economy and society DLR should ensure that the Plan aligns with national commitments on climate change mitigation and adaptation, as well as relevant sectoral, regional and local adaptation. 		
<p>iv) The submission from An Taisce recommends achieving adherence to the PA's legal obligations under the Habitats Directive and other environmental legislation cannot be achieved without the preparation in tandem with the County Development Plan of a full Strategic Environmental Assessment and Habitats Directive Assessment.</p>	A0065	The contents of this submission are noted. The Planning Authority will comply with the legal requirements regarding the preparation of the County Development Plan.
<p>v) Submission from the Department of Culture, Heritage and the Gaeltacht states that the SEA and Draft Plan should be guided by results of monitoring of the significant environmental effects of implementation of the previous development plan.</p>	A0148	The contents of this submission are noted. The SEA will take into account environmental trends including those relating to indicators and targets.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
vi) Submission considers that the SEA assessment should ensure that the potential population increase, additional housing supply among likely developments are appropriately assessed for the lifetime of the plan and a significant headroom increase should be allowed for given the continued shortage in sufficient housing provision.	A0144	The contents of this submission are noted. The SEA will appropriately assess Plan policies and objectives, including those relating to population increases and housing development.
vii) Submission requests that the Strategic Environmental Assessment and Appropriate Assessment of the upcoming development plan take into consideration the environmental issues which already exist today, and not just those issues which would be created or exacerbated by any of the policies or objectives contained in the upcoming development plan.	A0083	The contents of this submission are noted. In compliance with the legislation, the SEA and AA will assess the relevant environmental effects of implementing the Plan. As required by the SEA Directive, the SEA will identify: the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the Plan; the environmental characteristics of areas likely to be significantly affected; any existing environmental problems which are relevant to the Plan; and the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the Plan.
11.2 Appropriate Assessment (AA)		
i) Submission from the Department of Culture, Heritage and the Gaeltacht states that the Appropriate Assessment (AA) process should take place in consultation with the teams working on the Draft Plan, the Strategic Environmental Assessment (SEA) and the Strategic, Flood Risk Assessment, as each process can help inform the other to ensure that the objectives and policies in the Draft Plan will have no significant effects on biodiversity.	A0148	The contents of this submission are noted. DLR is the competent authority in relation to the screening for AA, and the carrying out of AA, if required, of the Draft Plan. The AA process will take place in consultation with the teams working on the Draft Plan, the SEA and the Strategic Flood Risk Assessment (SFRA).
ii) Submission from the Department of Culture,	A0148	The contents of this submission are noted. The AA of the Draft Plan will consider potential

Key Issue	Sub. No.	Executive's Opinion & Recommendation
Heritage and the Gaeltacht advises that Appropriate Assessment of the Draft Plan should include an assessment of the impacts of nitrogen deposition on Natura 2000 sites within the Draft Plan's zone of influence.		effects on European sites arising from the Plan. Such effects may include those relating to nitrogen deposition.
iii) AA Submission considers that it is imperative that the appropriate assessment is robust and comprehensive. The likely environmental impact of what could be a substantial level of development in the County needs to be fully assessed.	A0144	The contents of this submission are noted. The AA will be robust and comprehensive and will assess potential effects on European sites arising from the Plan.

Section 12: Appendices

Key Issue	Sub. No.	Executive's Opinion & Recommendation
12.1 Sandyford Urban Framework Plan (SUFP)		
<p>i) In relation to the Sandyford Urban Framework Plan (SUFP) area submissions contend that:</p> <ul style="list-style-type: none"> • A larger allocation of dwelling units, building heights and densities should be allocated to the Sandyford area in line with the NPF, RSES and Section 28 Guidelines. • A complete overhaul is required of the existing SUFP. • There is lack of zoning for mixed use and residential development. • Consideration should be given to allowing zonings with a greater mix of uses permissible, • Areas east of the existing Mixed-Use Core 1 to the Leopardstown Road should be looked as a mixed-use area. • Submission requests that the landbank bounded by Benildus Avenue and Blackthorne Drive represents a logical and natural extension of the SUFP area. 	<p>A0085 A0098 A0111 A0123 A0126</p>	<p>The contents of the submissions are noted. The SUFP area is acknowledged as an important brownfield regeneration area and growth centre in the County. It is specifically identified in the Metropolitan Area Strategic Plan (MASP) contained in the Regional Spatial and Economic Plan (RSES).</p> <p>The particular issue of mix of use has been carefully considered in the existing SUFP – section 2. The executive therefore does not agree that there is a lack of zoning for mixed use and residential in the SUFP area.</p> <p>Growth and development are encouraged in the area. Such growth is both plan-led and informed by carrying capacities of the infrastructure in the area, both physical and social. The SUFP that was prepared in 2011 and updated in the 2016 Plan, was responding directly to the fact that development had taken place in the SUFP area at an unprecedented rate and was not plan led. The resultant plan was calibrated with the delivery of enabling infrastructure.</p> <p>Whilst exciting new development has taken place and has also been permitted in the area since the adoption of the current Plan, there is still considerable scope left for high density compact development both commercial and residential on suitably zoned brownfield lands. The scale of development provided for in the SUFP aligns with the planned infrastructure carrying capacity. The infrastructure requirement to serve the development of Sandyford is set out in section 4 and 5 of the existing SUFP and this will be updated as part of the Draft Plan preparation. The work on the core strategy and the review of the SUFP will include a detailed analysis of lands required for both residential and employment uses.</p>
<p>ii) The submission states that it is important to establish if the current school's objective (No. 112) in Sandyford is obsolete. The submission also contends that schools should be integrated into</p>	<p>A0085</p>	<p>The content of this submission is noted. The adopted SUFP contains a section relating to Education and it is policy to provide the full spectrum of educational needs to support the Sandyford Business District. This includes provision of 2 primary schools and 1 post primary school. The Planning Authority are consulting with the Department of Education and Skills in</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
the urban fabric.		relation to school provision and this will inform the Draft Plan.
iii) Submission includes a comprehensive and detailed Strategic study and Action Plan for the Sandyford Business District (SBD) area.	A0098	The content and detail of this lengthy and comprehensive submission is noted. The public consultation outcomes are particularly insightful and welcome. Various sections of the Council will continue to work with the Sandyford BIDs in aiding and supporting them as appropriate in the delivery of their vision.
iv) Submission requests rezoning of the narrow strip of land to the north of Stillorgan Business Park to an active use.	A0098	In accordance with Section 10 of the Planning and Development Act 2000 as amended, the Council cannot consider at this Pre-Draft stage of the review process submission or observations relating to zoning and/or rezoning of specific parcels of land.
v) Submission outlines a number of very specific recommended actions including removal of a wall, strengthening pedestrian links from Beacon South Quarter, introduction of playful city elements to Beacon South Quarter, speed control measures and consideration of a 50-year Sandyford Business District (SBD) anniversary event.	A0098	The content and detail of this lengthy and comprehensive submission is noted. As acknowledged in the submission itself many of the objectives will not be delivered by the Council but rather by the Sandyford Business Improvement District (BID) Company. Other items are relevant to work of the Council but are too fine grained for the County Development Plan, for example, removal of a wall and or speed control measures.
vi) The submission states that DLR and Sandyford should aspire to be an exemplar of sustainable urban development.	A0085	The content of this submission is noted. The Council would agree with many of the sentiments expressed and consider that plan led development in accordance with the evidence based SUFP is already ensuring high quality sustainable development the in the SUFP area. There are certain elements of the plan that have not progressed and which the Council wish to progress - such as provision of high-quality open space.
12.1.1 Transport		
i) Submissions request: <ul style="list-style-type: none"> • Additional investment in cycle and pedestrian infrastructure in the SBD area. • Delivery of the Leopardstown Link Road. 	A0098	The contents of this submission are noted. The Council is about to start design of improved cycle and pedestrian facilities and permeability in the SBD area. This may include looking at options for links near Naomh Olaf's and a two-way cycle route along Burton Hall Road. These are operational issues, as is the question of a pedestrian crossing near Beacon South Quarter.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<ul style="list-style-type: none"> • Provision of shuttle bus should be by Sandyford BIDs. • Reduction of speed limit to 30km on Orbital Road around SBD core area (undelivered objective from SUFP). • Undertaking of a feasibility study with Naomh Olaf with a view to developing cycle/pedestrian way from Drumartin Link Road to SBD. • Provision of a new pedestrian crossing on Blackthorn Drive to provide access to Beacon South Quarter. • Removal of one-way system on Burton Hall Road or introduction of a contra flow cycle lane so as to allow West to East cycle movement. 		<p>There are sufficient policies and objectives regarding cycling and pedestrian facilities in the current Plan and in the SUFP which it is recommended are reviewed and updated in the Draft Plan. It is recommended that the Leopardstown Link Road be retained in the Draft Plan. Shuttle buses are a primarily a matter for the public transport regulator i.e. the NTA. Speed limits are subject to a separate statutory procedure and hence are beyond the scope of the County Development Plan.</p>
12.1.2 Open Space		
<p>i) Submission raise issues on open space as follows:</p> <ul style="list-style-type: none"> • States that there is a serious lack of green space within the Sandyford Business District Area. • Requests relocation of the civic park to the junction of Corrig Road and Tree Rock Road. Detailed proposals in relation to same are included. • Request provision of a pocket park at both the northern end of Ballymoss Road opposite the Luas stop and the southern end. 	<p>A0054 A0098</p>	<p>The contents of the submissions are noted. It is acknowledged that the provision of open space in the SUFP area is a challenge and it was the one area identified in the green infrastructure strategy as having a deficit of open space.</p> <p>The Council has already made some progress on provision of open space, working with the Sandyford BID Company to remove unsightly and unsustainable street furniture, bollards, boulders, etc. DLR have also constructed one small Pocket Park that includes the Red Jetty on Bracken Road and have almost completed a new Park with playground at the Drummartin Road/Blackthorn Road Junction.</p> <p>In terms of location, much thought was put into the proposed location at the plan making</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<ul style="list-style-type: none"> Request exploration with Irish Water of the provision of a viewing platform over the reservoir. Requests undertaking of a feasibility study with Irish Water with a view to ensuring public access to a portion of the reservoir site. 		<p>stage. As proposed, it is at the heart of the mixed-use core area, adjacent to a not yet developed residential area and to the south of significant permitted residential development on the Tivway and Rockbrook sites. The current proposed location of the park fed into the public realm approach on these two applications. It will also have an important relationship with Carmanhall Road which will have a linear greenway running from Ravens Rock Road to Carmanhall Road and widening into the Civic Park. To relocate the park would involve rezoning and cannot be considered at this stage.</p> <p>Despite disappointing setbacks at planning stage, the Council remain fully committed to pursuing with Irish Water the use of the reservoir site for open space.</p>
12.2 Dún Laoghaire Urban Framework Plan (DLUFP)		
12.2.1 Vision for the Dún Laoghaire Urban Framework Plan		
<p>i) Submissions present various visions for Dún Laoghaire Town as:</p> <ul style="list-style-type: none"> The centre for culture, food and night life. This is to be achieved by building apartments on underutilised sites. A vibrant beautiful shopping and waterfront community with more free or reasonable parking. a more 'desirable' location to live, work and shop through initiatives outlined within the 'Dún Laoghaire Town 2020 Vision' 	<p>A0002 A0016 A0031</p>	<p>The contents of the submissions are noted and agreed. The existing Dún Laoghaire Urban Framework Plan (DLUFP) in the current Plan contains a suite of objectives aimed at encouraging and creating a more vibrant place to live, work and visit.</p> <p>Subsequent to the adoption of the existing DLUFP, a number of permissions have been both granted and implemented in Dún Laoghaire which in turn will increase both the resident and employment population in the town. Furthermore, there has been a noticeable increase in food outlets and the retail function of the town continues to evolve.</p> <p>The Council will continue to support the development of Dún Laoghaire in an appropriate manner and will review and update the DLUFP when preparing the Draft Plan.</p>
<p>ii) Submission incorporates the 'Dún Laoghaire Town 2020 Vision' prepared in 2015 and suggests addendums to the document as follows:</p>	<p>A0031</p>	<p>The contents of this submission are noted and will inform the Draft Plan preparation.</p> <p>The National Transport Authority's (NTA) Cycle Network Plan for the Greater Dublin Area is</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<ul style="list-style-type: none"> • References to Business Improvement District (BID) to be updated • Highlight additional benefits of universal design • Revise cycle links to Institute of Art, Design and Technology (IADT) • Stress the benefits of a shuttle bus between the town and IADT. 		<p>the basis for cycle routes in the county. It will be reviewed during the lifetime of the County Development Plan. New cycle routes between Dún Laoghaire and IADT will be considered.</p>
<p>iii) Submission suggests residents' ideas for the future development of the town and harbour should be taken into account. It is suggested that DLR should:</p> <ul style="list-style-type: none"> • Buy back the town to provide for improved shops. • Seek investment to purchase property in the town. • Introduce street markets. • Encourage restaurants along Patrick Street. • Provide a multi-storey car park at the Boylan centre. • Develop the Tec building into an artisan sellers' hub. • Impose limits and take legal action on certain shop types. • Consider a new hotel at the vacant Dunnes Stores site. • Develop the shopping centre into a fashion outlet. 	<p>A0034</p>	<p>The content of the submission is noted. There are a number of policies and objectives within the current Plan and the DLUFP to guide the development of Dún Laoghaire and aimed at encouraging and creating a more vibrant place to live, work and visit.</p> <p>Subsequent to the adoption of the current Plan and DLUFP, a number of permissions have been granted for residential development in the town and indeed for the redevelopment of the Shopping Centre (Reg. Ref. D15A/0846).</p> <p>Furthermore, changes to planning legislation in 2018 introduced certain exemptions to planning in relation to living-over-the-shop.</p> <p>The Planning Authority can take legal action against certain forms of development in the event that there has been a breach of a permission or in the event that planning permission is required.</p> <p>The Council will continue to support the development of Dún Laoghaire in an appropriate manner and will update and review the DLUFP when preparing the Draft Plan.</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
iv) Submission suggests that Dún Laoghaire Town, requires a dedicated Town Architect in providing a coherent design-led approach to the future development of Dún Laoghaire.	A0133	The content of this submission is noted. This is not a County Development Plan issue. Both the preparation of the current DLUFP and any review thereof is carried out by a multi-disciplinary team including DLR's Architects Department.
v) Submission states that Dún Laoghaire could be developed as model sustainable town setting out a number of initiatives to help achieve this, namely: <ul style="list-style-type: none"> • Re-use of old-buildings over the construction of new ones. • Encouraging walkability by incentivising parking in existing car parks surrounding the Town. • Providing frequent electric eco shuttle-buses to move in a loop in and around the Town. 	A0133	The contents of the submission are noted.
vi) Submission seeks additional / new investment in Dún Laoghaire Town Centre.	A0143	The content of the submission is noted. The Council will continue to support the development of Dún Laoghaire in an appropriate manner and will update and review the DLUFP when preparing the Draft Plan.
12.2.2 Town Centre – Use & Vitality		
Retail		
i) Submissions state that a number of initiatives are required with regard to retail offering in Dún Laoghaire. It is noted that for a town of its size, the retail offering in is substandard and there is a need to provide resources for new traders to	A0026 A0097	The contents of the submissions are noted. Retailing has changed with the new focus in physical retailing is on what is called “experiential” retail with a resultant shift from a town centre dominated by comparison retail offer to one where more time is spent on “experiences” - leisure, culture, food, beverages and retail services. These trends will inform policy in the Draft Plan.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
establish in the centre of the town.		
ii) Submission accepts the need for higher density development and identifies the Dún Laoghaire Shopping Centre site as a prime mixed-use redevelopment site. Such redevelopment should be prioritised and ensure a more welcoming, outward-looking and street-focused development taking account of surrounding, more historic, context.	A0133	<p>The content of the submission is noted. Subsequent to the adoption of the current Plan and DLUFP a number of permissions have been granted for a mix of uses including residential development in the town and the redevelopment of the Shopping Centre (Reg. Ref. D15A/0846). There has been a noticeable increase in food outlets and the retail function of the town continues to evolve.</p> <p>The Council will continue to support the development of Dún Laoghaire in an appropriate manner and will update and review the DLUFP when preparing the Draft Plan.</p>
Residential		
iii) Submissions encourage an increased population, more residential uses and higher residential densities within Dún Laoghaire by recommending: <ul style="list-style-type: none"> • Increasing opportunities for living-over-the-shop. • Developing waterfront apartment schemes • Encouraging residents into the Town. • Allowing residential use in older buildings to retain a sense of place. • A mix of uses, house types and open spaces • That seeks retention of text in the Dún Laoghaire Urban Framework Plan that refers to the creation of public spaces to foster an attractive living and working environment. 	A0034 A0133 A0143 A0147	<p>The contents of this submission are noted and agreed. The DLUFP in the current Plan contains a suite of objectives aimed at encouraging and creating a more vibrant place to live, work and visit. The Council will continue to support the development of Dún Laoghaire in an appropriate manner and will update and review the DLUFP when preparing the Draft Plan.</p>
12.2.3 Movement		
i) A number of submissions raise issues in relation	A0034	The content of these submissions is noted and will inform the Draft Plan. At one stage a

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<p>parking as follows:</p> <ul style="list-style-type: none"> • Request that parking is facilitated and promoted in locations surrounding the town centre with visitors and shoppers being encouraged to walk, cycle and use public transport into the Town. • Request that: <ul style="list-style-type: none"> ○ Traffic is reduced. ○ The main street is pedestrianised. ○ A proper cycling network is provided to and within the town. ○ Buses move away from Georges Street. ○ Some existing roads – Tivoli and Crofton Roads - could facilitate more traffic. • There are difficulties in finding parking. 	<p>A0097 A0132 A0133 A0145 A0147</p>	<p>portion of Georges Street was pedestrianised but was subsequently reversed. Pedestrianisation requires consideration of servicing, public transport, cyclists, and utilities and would be subject to a separate public consultation and approvals process.</p> <p>The NTA's Cycle Network Plan for the Greater Dublin Area is the basis for cycle routes in the county. It will be reviewed during the lifetime of the County Development Plan. The cycle network around Dún Laoghaire will be considered.</p>
12.2.4 Community Facilities		
<p>i) Submission notes the success of the DLR Lexlcon however states that there is still a lack of community spaces in the town which would be further impacted upon in the event of the Boylan centre being removed. In this regard, the submissions request that additional and/or enhanced community facilities are required in Dún Laoghaire particularly given recent permitted residential developments.</p>	<p>A0133 A0147</p>	<p>The contents of these submissions are noted. The DLR Lexlcon Central Library and Cultural Centre offers extensive community space, serving Dún Laoghaire and its environs, through the provision of not only the library function, but also meeting rooms, study areas, gallery space and 100 seat studio space.</p> <p>Section 2.6 'The Hospital and Boylan Centre' in the Dún Laoghaire Urban Framework Plan identifies the Boylan Centre as a potential development site that could provide a 'mix of complementary uses'. In the current Plan, the site is zoned objective 'MTC' – <i>"To protect, provide for and/or improve major town centre facilities"</i> where a number of uses are permitted in principle, including 'community facility'. It is intended to update and review the DLUFP as part of the preparation of the Draft Plan where potential for additional community space may be considered for Dún Laoghaire.</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
		As outlined under Section 3.3.4 Community Facilities, part (iii), above, it is intended to include a policy within the Draft Plan requiring future development proposals to provide a community audit.
12.2.5 Dún Laoghaire Harbour		
<i>Uses within the Harbour</i>		
i) Submission requests that a number of provisions are included in the Draft Plan for the harbour, including: <ul style="list-style-type: none"> • A shared water sport facility for use by clubs. • A semi-permanent marina within the inner Coal Harbour during the active season. • The provision of electric motorboats on an affordable rental basis. 	A0033	<p><u>A number of these issues are more fine-grained operational issues for the harbour and also fall outside the remit of the Development Plan.</u> From a strategic perspective such issues are permissible in the harbour. Semi-permanent marinas are not ideal as infrastructure is susceptible to damage when being removed and re-installed annually, furthermore, there is insufficient depth in this area for pontoons. Watersports providers are already providing rental of electric canoes within the Harbour and it is likely that this market would develop organically.</p> <p>DLR and Irish Sailing had been successful in securing funding for a feasibility study for the National Watersports Campus proposal, subject to satisfactory completion of Stage 7 of the Large Scale Sport Infrastructure Fund (LSSIF) evaluation process. The project is now undergoing further assessment and a due diligence procedure by the Department of Transport, Tourism and Sport (DTTas) under Stage 7 of the evaluation procedures for the LSSIF.</p>
ii) Submission suggest that DLR: <ul style="list-style-type: none"> • Should facilitate a public meeting. • Create a family friendly, accessible, tourist destination. • Develop the ferry terminal as a tourist focal point. 	A0034	<p>The contents of this submission are noted. <u>A number of the issues raised are more operational issues for the harbour rather than County Development Plan issues.</u> It is recommended that the existing DLUFP policies and objectives be reviewed and updated in the Draft Plan and be informed by the two ongoing Urban Regeneration and Development Fund (URDF) studies on Dún Laoghaire.</p> <p>Any specific development proposals within the Harbour would be subject to further</p>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
<ul style="list-style-type: none"> • Encourage public transport. • Provide appropriate car parking. • Generate car parking revenue through a park & ride facility. • Use the Carlisle Pier for small cruise ships. • Develop a seafront walk. • Provide row boat hire during the summer. 		consultation as part of the development management / Part 8 process. At present, the Ferry terminal has secured planning permission as a Business Incubator Hub.
iii) Submission supports to the creation of a national watersports campus and/or a National Marine Campus within the harbour.	A0038 A0060	The contents of the submissions are noted. Specific Local Objective (SLO) 157 supports and encourages the development of a National Water sports Centre within the Harbour. DLR and Irish Sailing had been successful in securing funding for a feasibility study for the National Watersports Campus proposal, subject to satisfactory completion of Stage 7 of the LSSIF evaluation process. The project is now undergoing further assessment and a due diligence procedure by DTTaS under Stage 7 of the evaluation procedures for the LSSIF. Support for this development will be retained within the Draft Plan. It is recommended that existing SLO 157 will be reviewed and updated.
iv) Submission notes the potential amenity value in developing the 'Gut' area of the West Pier.	A0038	The content of the submission is noted. There is an existing SLO 95, which relates to the Gut. It is recommended that this SLO be reviewed and updated as part of the preparation of the Draft Plan. The 'Gut' area will be included in the boundary provided to the consultants carrying out the Harbour Economic plan. This plan and the feasibility study for the National Watersports Campus proposal may have a bearing on SLO 95.
v) Submission requests that additional car parking be provided within existing parking areas associated with the former queuing areas of the ferry terminal.	A0038	The contents of this submission are noted. This area is being included in the boundary provided to the consultants carrying out the Harbour Economic plan, the outcome of which will be considered in the preparation of the Draft Plan insofar as possible. It should be noted that car parking standards are generally designed to limit car-borne commuting. The harbour area has high accessibility by public transport (DART and buses).
vi) Submission seeks the establishment of a	A0059	The Council would not agree with this submission as it relates to a very specific use in a

Key Issue	Sub. No.	Executive's Opinion & Recommendation
genealogy centre in the former Stena building.		building where another use has been permitted. It is not recommended that this be included in the Draft Plan. Furthermore, the EPIC Diaspora Centre was established in 2016 the CHQ building in Dublin within approximately 20minutes from Dún Laoghaire, it is unlikely that a second such facility in relatively close proximity would be feasible.
vii) Submission seeks an increase in financial support for a variety of festivals and notes the success of 'Beat Yard' event.	A0097	The contents of the submission are noted, however, <u>financial support for specific activities are not a County Development Plan issue.</u>
Conservation		
viii) Submission seeks a protection order for the harbour together with the adoption of the Candidate Architectural Conservation Area (cACA).	A0038	The Council agrees with the sentiments expressed in this submission. The Council recognises the significance of the Harbour as indicated by the number of Protected Structures listed in the Record of Protected Structures (RPS), the listing of the Harbour as a cACA and Policy AR10: Protection of Coastline Heritage in the current Plan. It is recommended that these elements be retained and reviewed in the preparation of the Draft Plan.
ix) Submission requests that elements of the Heritage Management Plan (2011) for the harbour are incorporated into the Draft Plan.	A0038	The Heritage Management Plan was prepared by the Dún Laoghaire Harbour Company in 2011. SLO 136 contained within the current Plan, explicitly refers to the review of the 2011 Heritage Plan with a view to including same in the Development Plan. The status and the content of SLO 136 will be reviewed in the preparation of the Draft Plan.
Biodiversity		
x) Submission states that a program of ecological conservation protection in the harbour is required.	A0038	The content of the submission is noted. The Council agrees with the sentiment of the submission. All development within the Harbour is subject to Appropriate Assessment (AA) Screening, and Environmental Impact Assessment Report (EIAR) screening process and Ecological Impact Assessment, as deemed necessary by the Planning Authority.
General		
xi) Submission wishes to congratulate DLR on harbour	A0038	The contents of the submission are noted and welcomed.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
initiatives, including repair works and securing of funding for projects.		
xii) Submission seeks the provision of legislation that ensures retention of the harbour in public ownership.	A0038	The contents of this submission are noted. The Harbour was transferred into DLR (public) ownership via Statutory Instrument 391/2018. <u>The preparation and adoption of legislation is not a County Development Plan issue.</u>
xiii) Submission seeks the designation of the harbour as a Marine National Park.	A0038	At present the Council are not aware that the current legislation provides for designation of Marine Parks. <u>This is not a County Development Plan issue</u> as the jurisdiction to the Planning Authority ends at the high-water mark.
xiv) Submission seeks a review of the existing harbour bye-laws.	A0038	The contents of the submission are noted. <u>The reviewing of bye-laws, however, is not a County Development Plan issue.</u>
12.3 Building Height Strategy		
i) Submissions raise issues in relation to building heights and contend that: <ul style="list-style-type: none"> • A number of areas including Stepside contain too many taller buildings or are not suitable for taller buildings. • That consideration should be given to capping building heights in Shankill. • There is scope for height in Cherrywood. 	A0036 A0072 A0118 A0069	The contents of the submissions are noted. The existing Building Height Strategy was adopted by way of a variation to the 2010 - 2016 Plan in 2011 and was reviewed and carried through into the 2016 - 2022 Plan. In the preparation of the Draft Plan it is recommended that the Building Height Strategy be reviewed and updated to be consistent with National and Regional objectives set out in the NPF and RSES, and to have regard to the Section 28 'Urban Development and Building Height Guidelines' and to be consistent with the 4 Strategic Planning Policy Requirements contained within.
ii) Various submissions contend that the current Building Height Strategy is not compliant with the Section 28 'Urban Development and Building Height Guidelines'. Submissions contend that an up-to-date building height strategy is needed that sets out where increased building heights are	A0098 A0102 A0108 A0112 A0121 A0122	The contents of the submissions are noted. The existing Building Height Strategy was adopted by way of a variation to the 2010 - 2016 Plan in 2011 and was reviewed and carried through into the 2016 - 2022 Plan. In the preparation of the Draft Plan it is recommended that the Building Height Strategy be reviewed and updated to be consistent with National and Regional objectives set out in the NPF and RSES, and to have regard to the Section 28 'Urban Development and Building Height Guidelines' and to be consistent with the 4 Strategic

Key Issue	Sub. No.	Executive’s Opinion & Recommendation
<p>considered suitable in the County. Any Building Height Strategy should use merit or performance-based criteria assessment. Specific areas in the County are referenced including:</p> <ul style="list-style-type: none"> • Stillorgan including Blakes site • SUIFP area • Areas along public transport corridors • Dún Laoghaire • Dundrum • Cherrywood. 	<p>A0123 A0124 A0126 A0128 A0129 A0144</p>	<p>Planning Policy Requirements contained within.</p>

Section 13: Non-Specific/Generic Zoning Objectives

Key Issue	Sub. No.	Map No.	Executive's Opinion & Recommendation
13.1 Specific Objectives			
13.1.1 Specific Local Objectives (SLOs)			
i) Submission requests Public Realm strategy for the Village of Glasthule.	A0030	3	The contents of this submission are noted. This is an operational issue. <u>This is not a County Development Plan issue.</u>
ii) Submission requests the retention of reinforcement and/or amendment of a number of Specific Local Objectives (SLOs) in the Draft Plan, including SLO nos. 13, 14, 15, 16, 77, 136, and 157 in relation to the Harbour.	A0043	3	The content of this submission is noted. It is recommended that the suite of SLOs relating to Dún Laoghaire Harbour will be reviewed and updated as part of the preparation of the Draft Plan.
iii) Submission requests that existing SLO 159 on Map 5 which relates to the reuse and extension of the sport science complex as a transitional step-down medical care service be retained and "displaced"/relocated.	A0094	5	The content of this submission is noted. As this would require rezoning it cannot be considered at this stage of the Plan.
iv) Submission suggests that the appropriate way forward for Foxrock is the implementation of a Local Area Plan.	A0113		The content of this submission is noted. It is recommended that during the County Development Plan review process areas be identified where new LAPs are required.
v) Submission recommends, in the absence of an agreed traffic management scheme for Brennanstown Road, that SLO 13 is removed or amended.	A0122	7	The contents of this submission are noted. A Part 8 Planning application, for Brennanstown Road, to cater for development in that area was not approved by Council. However, transport measures from the Part 8 were conditioned in development that was subsequently permitted by An Bord Pleanála in various Strategic Housing Development (SHD) planning applications. This issue will be considered in the preparation of the Draft Plan.

Key Issue	Sub. No.	Map No.	Executive's Opinion & Recommendation
vi) Submission refers to SLO 4 that relates to Airfield Estate. It is requested that the Council consider incorporating policies or objectives in relation to Airfield to facilitate a wider range of uses.	A0127	1 & 5	The content of this submission is noted. This will be examined in the course of the preparation of the Draft Plan. It is noted however, that the existing SLO already specifically mentions educational, recreational and cultural uses.
vii) Submission refers to Specific Local Objective 64 "To improve pedestrian and cycle permeability to and from the former Dún Laoghaire Golf Course lands at Honey Park" and emphasises the importance of pedestrian and cycle lane connections between Honey Park/Cualanor and the town centre.	A0133	3 & 7	The content of this submission is noted. Excellent permeability links have been achieved from the new neighbourhoods at Cualanor and Honey Park, linking this vibrant new community in a sustainable manner to both adjoining schools, the adjoining major town centre, neighbouring residential areas and excellent public transport links. The provision of these links has been through an active, positive and collaborative effort between the developer and the Planning Authority.
viii) Submission refers to Specific Local Objective 73 which relates to St. Michael's Hospital and Boylan Centre sites. Submission goes on to state that the community facilities provided in the Boylan centre should not be lost.	A0133	3	Section 2.6 'The Hospital and Boylan Centre' in the Dún Laoghaire Urban Framework Plan identifies the Boylan Centre as a potential development site that could provide a 'mix of complementary uses'. In the current Plan, the site is zoned Objective 'MTC' – "To protect, provide for and/or improve major town centre facilities" where a number of uses are permitted in principle, including 'community facility'. It is recommended that the Dún Laoghaire Urban Framework Plan (DLUFP) be reviewed as part of the preparation of the Draft Plan
ix) Submissions refers to a number of existing SLOs relating to Dún Laoghaire as follows: <ul style="list-style-type: none"> • Request for retention of SLO 77 "to prepare a Local Area Plan for Dún Laoghaire and Environs". • Carnegie library should have a community use. 	A0133 A0147	3	The content of this submission is noted. The Planning Authority agree with some of the sentiments of this submission. It is recommended that the specific local objective to prepare a Local Area Plan for Dún Laoghaire be retained. Timing for delivery of same will be subject to agreed priority list of Local Area plans and resources. It is recommended that the other SLOs pertaining to Dún Laoghaire be reconsidered and that such reconsideration be informed by the ongoing studies of Dún Laoghaire Town and Harbour.

Key Issue	Sub. No.	Map No.	Executive's Opinion & Recommendation
<ul style="list-style-type: none"> Submission requests a reconsideration of SLO 128 & SLO 143. Submission requests the retention of SLO 152. 			
x) Submission recommends the inclusion of a new Specific Local Objective for the sports grounds on Tivoli Terrace South.	A0133	3	The content of the submission is noted. This site is in private ownership; therefore, it is out of the remit of the Council to provide a pitch on same
xi) Submission requests the retention and revision of a number of existing SLOs (149 and 150) that pertain to Dundrum and suggest a number of new SLOs for Dundrum relating to: <ul style="list-style-type: none"> Heights (No more than 2/3 storeys at street level rising up towards bypass. Universal Design and age friendly design on Old Shopping Centre site. 	A0151	1 & 5	The contents of this submission are noted. Pending the preparation of the Dundrum Local Area Plan (LAP) the Dundrum UFP (Urban Framework Plan) will be reviewed and updated as part of the Draft Plan.
13.1.2 Roads Objectives			
i) Various submissions raise issues in relation the DEBP reservation as follows: <ul style="list-style-type: none"> Alignment and the wording of Specific Local Objective 6 identified on Map 2 should be amended in order to sustain the continued effective operations of St Helen's House. Clarity is required on the alignment as there are differing maps (specific 	A0048 A0061 A0064 A0129	2	The contents of these submissions are noted. The requirement for the long-term protection of the Dublin Eastern Bypass (DEBP) – is a strategic requirement, as set out in the Regional Spatial and Economic Strategy (RSES) and National Transport Authority (NTA) Transport Strategy for the Greater Dublin Area 2016-2035. SLO 6 in the current Plan allows for a temporary public transport link pending a decision of the Transport Infrastructure Ireland (TII)/Central Government in relation to the future status of the Bypass. The 'BlueLine' Bus Rapid Transit (BRT) has been superseded by BusConnects route no 13 and 14 of the Core Corridor Project and there is no longer a

Key Issue	Sub. No.	Map No.	Executive's Opinion & Recommendation
<p>reference to No.6 Owenstown Park).</p> <ul style="list-style-type: none"> Additional desirable public transport uses should be considered in the reservation. Reservation should be reviewed and/or omitted. 			<p>proposal to route a BRT along the DEBP.</p> <p>During the preparation of the Draft Plan the discrepancy raised in relation to no 6 Owenstown Park will be checked. Consideration will be given in the preparation of the Draft Plan to updating SLO 6.</p>
13.1.3 Institutional Lands (INST) Objective			
<p>i) Submissions relate to institutional land and argue both to retain or remove the INST zoning objective as follows:</p> <ul style="list-style-type: none"> Submissions recommend that a specific new type of zoning should be created along the lines of Dublin City Council's Z15 zoning (Community Infrastructure), in order to protect such lands. Permitted uses in any new Z15 (community infrastructure) like zoning should be as Zone A, (i.e. Density RES5 (35-50ha), Public Open Space 25%, School Expansion etc.). Requests that where land in institutional use is currently being used for sporting or recreational use there should be a general presumption included in the Development Plan against the development of these lands except in exceptional circumstances. Submission recommends removal of 	<p>A0071 A0074 A0097 A0110 A0117</p>		<p>The first two bullet points relate to zoning. In accordance with Section 10 of the Planning and Development Act 2000 as amended, the Council cannot consider at this Pre-Draft stage of the review process submission or observations relating to zoning and/or rezoning of specific parcels of land.</p> <p>The INST objective is however something that will be reviewed as part of the preparation of the Draft Plan.</p> <p>Purpose of INST is to protect lands which were institutional when and if they come forward for development.</p>

Key Issue	Sub. No.	Map No.	Executive's Opinion & Recommendation
INST objective from Mount St Mary's, Dundrum Road as the site is no longer in use for Institutional purposes; there is no demand for INST use on site and the lands are zoned for residential use.			
ii) Submission relate to the requirement to provide 25% of a brownfield site for open space on INST lands. One contends this runs contrary to National guidance, another recommends the retention of this requirement.	A0112 A0151		The contents of these submissions are noted. The INST objective is something that will be reviewed as part of the preparation of the Draft Plan.
13.2 Land Use Zoning			
i) Submissions seek the protection of 'green zones' and/or Greenbelts.	A0025 A0026 A0036 A0046 A0065 A0072 A0082 A0145		DLR is predominantly a suburban County and one that has a continuous built form that runs from the boundary with the City to Bray and/or the Dublin Mountains. There is some "green belt" zoning between Rathmichael, Shankill and Bray but in other parts of the County the green area (parks and open space and wildlife corridors) tend to be less "buffers" between development and more integral amenities for those areas. It is noted that there is reference in the Metropolitan Area Strategic Plan (MASP) to a metropolitan green belt around the built-up area of the city and suburbs. National Planning Framework (NPF) National Policy Objective (NPO) 62 references the role of greenbelts in preventing calescence of built up areas but also in allowing long term expansion of urban areas.
ii) Submission requests high amenity upland area should be protected and that that a clear boundary defining high amenity upland areas be provided.	A0041		The Council would agree with the sentiments of this submission. The land use zoning objective for high amenity areas already provides a clear demarcation of what lands are considered high amenity. The high amenity areas correspond predominantly with the upland areas.
iii) Submission requests the review of the	A0044	6	In accordance with Section 10 of the Planning and Development Act 2000 as amended, the

Key Issue	Sub. No.	Map No.	Executive's Opinion & Recommendation
application of lands zoned objective 'F' Reference is made to a site in Foxrock.			Council cannot consider at this Pre-Draft stage of the review process submission or observations relating to zoning and/or rezoning of specific parcels of land.
iv) Submission welcomes that fact that the Blackrock clinic was given the zoning objective MH in the current Plan. Submission requests continue support and promotion of facilities at Blackrock Clinic in the forthcoming County Development Plan.	A0093		Submission is noted.
v) Submission suggests the incorporation of an additional zoning objective – A3 - to retain and protect existing established residential amenities that retain an established pattern and character. Reference in this context is made to the Ardilea Estate.	A0102	1 & 2	In accordance with Section 10 of the Planning and Development Act 2000 as amended, the Council cannot consider at this Pre-Draft stage of the review process submission or observations relating to zoning and/or rezoning of specific parcels of land.
vi) Submission makes the case that a greater mix of uses should be promoted on lands which are currently zoned specifically for employment uses. The submission refers to lands at Clonskeagh and suggests they are well suited for a more integrated, mixed use approach.	A0106	1	This submission is in effect looking to allow more residential on employment zoned lands. The Draft Plan will include the core strategy which will assess requirements in relation to employment lands.
vii) Submission refers to a specific site - Quadrant 3 the Park Carrickmines lands and request that the site should continue to be designated via an SLO for delivery of a neighbourhood centre with a significant	A0107	9	The current Plan contains an SLO to allow for a Neighbourhood Centre on lands which are subject to zoning 'Objective E' – "To Provide for economic and employment" – so as to meet the needs of the growth areas of Kiltiernan-Glenamuck, Carrickmines and Stepside-Ballyogan. Permission was granted for the neighbourhood centre in late 2019. The contents of the submission will be considered in the preparation of the Draft Plan and in

Key Issue	Sub. No.	Map No.	Executive's Opinion & Recommendation
element of residential development. Submission also requests the plan to recognise the employment provided by retail uses.			doing so will have regard to the core strategy.
viii) Submission refers to a specific site at Tivoli Terrace South zoned Objective F. The submissions take opposing views – one recommending rezoning, and one recommending retention of current zoning.	A0115 A0133	3	The content of this submission is noted. In accordance with Section 10 of the Planning and Development Act 2000 as amended, the Council cannot consider at this Pre-Draft stage of the review process submission or observations relating to zoning and/or rezoning of specific parcels of land.
ix) Submission seeks the review of the current 'DC' zoning of the Former Blakes Nightclub and Esmonde Motors site in Stillorgan.	A0122	2	In accordance with Section 10 of the Planning and Development Act 2000 as amended, the Council cannot consider at this Pre-Draft stage of the review process submission or observations relating to zoning and/or rezoning of specific parcels of land. It is noted that the submission addresses other items which are addressed elsewhere in this report.
x) Submission refers to a site to the south of Stepside Village zoned Objective F. A feasibility study is submitted outlining the potential for delivery of a community centre, residential development and a retirement village.	A0125	9	Such a scheme would require rezoning. In accordance with Section 10 of the Planning and Development Act 2000 as amended, the Council cannot consider at this Pre-Draft stage of the review process submission or observations relating to zoning and/or rezoning of specific parcels of land.
xi) Submission states that the members of Foxrock Golf course have no objection to the current 'F' zoning of the lands.	A0104	6	The submission is noted. In accordance with Section 10 of the Planning and Development Act 2000 as amended, the Council cannot consider at this Pre-Draft stage of the review process submission or observations relating to zoning.
xii) Submission includes a masterplan for future development at Glenamuck. An area of land is shown as rezoned from objective B and G to A.	A0095	9	In accordance with Section 10 of the Planning and Development Act 2000 as amended, the Council cannot consider at this Pre-Draft stage of the review process submission or observations relating to zoning and/or rezoning of specific parcels of land. It is noted that the submission addresses other issues which are addressed elsewhere in this report.

Key Issue	Sub. No.	Map No.	Executive's Opinion & Recommendation
xiii) The submission states that the O/O designation (wherein an additional house within existing gardens is prohibited), is overly restrictive and inappropriate, in particular given that the Killiney area is served by a DART station.	A0086	3,4 & 10	It is recommended that the 'O/O Objective' be reviewed as part of the review as there may be some areas where it could be lifted. In relation to the Killiney area, there are however a significant number of buildings which are on the Record of Protected Structures (RPS) in the area in addition to the Architectural Conservation Area (ACA). The road network may also be unable to allow significant densification.
xiv) Submission requests that consideration be given to a more rationale land use zoning of the lands to the rear of the properties on Ballyogan Road. Consideration could be given to a residential and mixed use given the close proximity to the Luas stop.	A0142	9	In accordance with Section 10 of the Planning and Development Act 2000 as amended, the Council cannot consider at this Pre-Draft stage of the review process submission or observations relating to zoning and/or rezoning of specific parcels of land. It is noted that the submission raises other items which are addressed elsewhere in this report.
xv) Submission is requesting DLR to review the Zoning Objective 'G' (To protect and improve high amenity areas) in the area between the M50 and the Brides Glen Road, and in particular the area along the upper Brides Glen Road where there are many houses.	A0066	9 & 10	In accordance with Section 10 of the Planning and Development Act 2000 as amended, the Council cannot consider at this Pre-Draft stage of the review process submission or observations relating to zoning and/or rezoning of specific parcels of land.
xvi) The submission from An Taisce requests DLR to revise the F Zoning policies in the coastal fringe along Merrion Road and Rock Road.	A0065	2	The content of this submission is noted. The coastal fringe along the Merrion Road falls within the jurisdiction of Dublin City Council. Zonings will be reviewed in the preparation of the Draft Plan.

Section 14: Miscellaneous

Key Issue	Sub. No.	Executive's Opinion & Recommendation
14.1 Communication		
i) Submission recommends that public consultation take place early in the process	A0029	The content of this submission is noted and agreed. The Pre-Draft consultation process which took place in January and February 2020 and which is informing this report and the forthcoming Draft Plan was carried out as step one of the entire 2-year review process.
ii) Submissions request that the Council prepare for the implementation of European Union (EU) Web Accessibility Directive. Submissions request that communications are fully accessible to people with disabilities including sign language, audio description and text on videos and that accessible websites and apps are accessible.	A0052 A0053	The contents of this submission are noted. The EU Web Accessibility Directive was approved on 26 October 2016. It relates to the accessibility of the websites and mobile applications of public sector bodies" and requires public bodies to ensure their websites and apps are accessible to persons with disabilities. Existing websites will have to comply by 23 September 2020. All mobile applications will have to be accessible by 23 June 2021. The Directive will be transposed into Irish law via Regulations that are currently being drafted by the Department of Communications, Climate Action and Environment. <u>This is not a County Development Plan issue.</u>
iii) Submission requests that the development plan meets the plain English guidelines and is available in accessible formats.	A0053	The content of this submission is noted. The National Adult Literacy Agency has produced the Plain English Guidelines which recommend 14 steps for plain English. Whilst there is no issue with meeting some of the guidelines the legislative requirements of what must be contained in a County Development Plan must take precedence and by their nature Development Plans contain some complex language.
iv) Submission requests that any future open days take account of accessibility.	A0053	The contents of this submission are noted. All open days held have taken account of accessibility in choice of venues. All venues were fully accessible. All future open days will also take account of accessibility in choice of venues.
v) Submission supports the development of technological infrastructure in public spaces	A0103	Submission is noted and welcomed. The Pre-Draft consultation process utilised technology via Instagram, Facebook, twitter and touch screen interactive screens in County Hall.

Key Issue	Sub. No.	Executive's Opinion & Recommendation
14.2 Agriculture		
i) Submission recommends means to reduce emissions via a reduction in beef and dairy herds and also the raising of prices for beef and dairy.	A0013	The contents of this submission are noted. <u>This is not a County Development Plan issue.</u>
ii) The submission recommends that the new Plan includes additional policies with respect to agriculture.	A0014	The contents of the submission are noted. The agricultural sector is an economic and amenity sector within the County. It is recommended that the existing policy on rural development be reviewed and updated.
14.3 General		
i) Submission makes a number of recommendations in relation to the format of the Draft Plan.	A0014	The contents of this submission are noted and will be considered in the Draft Plan preparation process.
ii) Submission recommends that the Draft Plan includes a policy with respect to extraction.	A0014	The contents of this submission are noted and will be considered in the preparation of the Draft Plan.
iii) The submission suggests that DLR should substitute the word 'will' for 'may' in the Draft Plan with respect to policies/objectives etc.	A0014	The Planning Authority are unclear as to whether this submission has been made based on an examination of the current Plan as most policies in the existing plan state "It is Council policy to promote or ensure or support" etc. In the expanding text beneath the policy the word "will" is used and not "may".
iv) Submission seeks the protection of the remaining herd of wild goats at the Scalp Kiltiennan as a tourist attraction.	A0041	The contents of the submission are noted. <u>This is not a County Development Plan issue.</u>
v) Submission requests that the Draft Plan clearly sets out the status of the written statement, particularly with regard to allowing DLR or An Bord Pleanála to ignore or vary the requirements of the plan.	A0055	The content of this submission is noted. The status of the County Development Plan is as set out in the Planning and Development Act 2000 (as amended). Section 13 of the Act provides for the making of a variation to the plan subsequent to a public consultation process and a vote by elected members. Furthermore, Section 34(6) establishes the 'material contravention' procedure, whereby planning authorities may, following a specified process of public

Key Issue	Sub. No.	Executive's Opinion & Recommendation
		consultation and a vote by elected members, decide to grant permission for development proposals that would otherwise materially contravene the plan. With regard to An Bord Pleanála, Section 37(2) of the Act specifies that (subject to certain requirements), the Board may in determining an appeal decide to grant a permission even if the proposed development contravenes materially the plan relating to the area of the planning authority to whose decision the appeal relates. These procedures are clearly set out in the Planning and Development Act 2000 (as amended). Section 1.1 in Chapter 1 of the existing Plan clearly sets out the process for making the Plan. It is recommended that that this section be retained and updated for the purposes of the Draft Plan. However, the Council does not consider it necessary or appropriate to provide a detailed statement on the material contravention or variation process.
vi) Submission suggests that a review should be undertaken following any precedential decision by An Bord Pleanála, which overturns a Local Authority decision, and a report presented to Councillors on required amendments to the County Development Plan.	A0065	The contents of the submission are noted. <u>This is a procedural issue and not a County Development Plan review issue.</u> There is no legal basis for such a procedure. Any amendments to a County Development Plan are dealt with via the variation process which is a reserved function.
vii) Submission requests more public art in DLR, and in particular the roll out of street art.	A0074	The contents of this submission are noted. It is recommended that this be considered as part of the Draft Plan preparation process.
viii) Submissions raise a number of issues as follows: <ul style="list-style-type: none"> • Requests the installation of signage to denote areas. • County Development Plan should include a policy on full transparency regarding all revenue sources. 	A0032 A0074	The content of these submissions is noted. <u>This is not a County Development Plan issue.</u>
ix) Submission requests that the upcoming development plan includes a policy to support the	A0083	The content of this submission is noted. It is not considered appropriate that there would be a policy on the specific delivery of a particular construction project in a strategic County

Key Issue	Sub. No.	Executive's Opinion & Recommendation
development and construction of the University College Dublin (UCD) Student Residences Masterplan.		Development Plan. There is an overarching policy on student accommodation which it is recommended be reviewed and updated as part of the Draft Plan preparation process.
x) Submission raises a number of issues relating to Dalkey and Bullock Harbour including the suggestion that the Our Lady's Manor site in Dalkey could be developed as a museum / hotel / diaspora centre / commercial centre.	A0092	The content of this submission is noted. Our Lady's Manor site is in private ownership and is in use as a private nursing home.
xi) Submission recommends that funding should be allocated for public toilets in the area Dún Laoghaire area and to install and maintain public drinking fountains throughout DLR.	A0097	The contents of this submission are noted. These are operational issues. <u>This is not a County Development Plan issue.</u>
xii) Submission suggests the provision of water fountains on busy walking routes and at transport hubs.	A0100	The contents of this submission are noted. This is an operational issue. <u>This is not a County Development Plan issue.</u>
xiii) Submission calls for a County where the public services are provided for the people in accordance with the democratic wishes of the people as articulated by their local elected representatives and where consultation is taken seriously.	A0131	The contents of this submission are noted. The Council agrees with the sentiments expressed in the submission and is committed to fulfilling the vision for the County as expressed in the recently adopted DLR Corporate Plan 2020-2024: <i>"creating a progressive and vibrant County that is attractive, inclusive and accessible for everyone"</i> . The Council will strive to ensure that the Draft Plan reflects this vision.
xiv) Submission recommends making "Changing Places" facilities the new minimum standard for toilet accessibility.	A0138	The contents of this submission are noted. <u>This is not a County Development Plan issue.</u>
xv) Submission welcomes DLR County Council's support of Community Radio.	A0140	The contents of this submission are noted. The current Plan contains a specific 'Policy E3: Creative County – Culture and Creative Industries' which states that <i>"it is Council policy to</i>

Key Issue	Sub. No.	Executive's Opinion & Recommendation
		<i>promote the development of creative enterprises in the County</i> ". It is recommended that this policy be reviewed and updated in the Draft Plan.
xvi) Submission states recent legislation is in direct conflict with the County Development Plan as it allows the County Development Plan to be cast aside, ignored and bypassed.	A0146	The contents of the submission are noted. The process of making a County Development Plan is a reserved function of the elected representatives and is made in accordance with the Planning and Development Act 2000, as amended. Recent changes in legislation have introduced Specific Planning Policy Requirements (SPPRs) with which Planning Authorities must comply even when they conflict with content of a County Development Plan. The Strategic Housing Development (SHD) process has also been introduced since the adoption of the last Plan. Like previous Plans, the 2022 – 2028 Dún Laoghaire-Rathdown County Development Plan will set out the strategic vision and overall policy objectives for the County during that period. The County Development Plan is required to have regard to all new legislation.

Part 4: Appendices to Chief Executives Report

Appendix A: Persons/Bodies Directly Informed

1. Prescribed Bodies

- The Minister, Minister for Housing Planning and Local Government, Custom House, Dublin 1, D01 W6X0
- The Office of the Planning Regulator, Office of the Planning Regulator, Block C, 77 Sir John Rogerson's Quay, Grand Canal Dock, Dublin 2, D02 VK60
- Adjoining Local Authorities
- Wicklow County Council, Wicklow, County Buildings, Whitegates, Wicklow Town, A67 FW96
- South Dublin County Council, County Hall Tallaght, Dublin 24, D24 YNN5
- Dublin City Council, Civic Offices, Wood Quay, Dublin 8, D08RF3F
- Regional Assembly, Eastern and Midland Regional Assembly, 3rd Floor North, Ballymun Civic Centre, Main Street, Ballymun, Dublin 9, Ireland.
- Local Community Development Committee, LCDC, Dún Laoghaire-Rathdown County Council
- The Board, An Bord Pleanála, 64 Marlborough Street, Dublin 1
- The Minister for Agriculture, Fisheries and Food, Minister for the Department of Agriculture, Food and the Marine, Michael Creed, Head Office Agriculture House, Kildare St. Dublin 2. D02 WK12
- The Minister for Arts, Heritage and the Gaeltacht, Minister Josepha Madigan, 23 Kildare Street, Dublin 2, D02 TD30
- The Minister for Communications, Communications, Climate Action & Environment, Minister Richard Bruton, Minister's Office, 29-31 Adelaide Road
- The Minister for Defence, Department of Defence, Minister Kehoe, Head Office, Department of Defence, Station Road, Newbridge, W12 AD93
- The Minister for Education and Skills, Department of Education and Skills, Minister Joe McHugh, Department of Education & Skills, Marlborough Street,
- The Minister for Transport, Tourism and Sport, Department of Transport, Tourism and Sport, Minister Shane Ross, Department of Tourism and Sport
- An Chomhairle Ealaíon, Arts Council of Ireland, 70 Merrion Square Dublin 2
- The Commissioners, Office of Public Works, 52 St. Stephen's Green, Dublin 2.
- Dublin Airport Authority, Dublin Airport Authority, DAA Head Office, Old Terminal Building, Dublin Airport, Co Dublin
- National Transport Authority, Dún Scéine, Harcourt Lane, Dublin 2
- EirGrid, The Oval, 160 Shelbourne Road, Ballsbridge, Dublin 4, D04FW28
- The Environmental Protection Agency, EPA Headquarters, PO Box 3000, Johnstown Castle Estate, Wexford, Y35 W821
- ESB (Electric Ireland), ESB Head Office, Gateway, Two Gateway, East Wall Road, Dublin 3, D03 A995
- Forfás, Department of Business, Enterprise and Innovation, Department of Business, Enterprise and Innovation, 23 Kildare Street, Dublin 2, D02 TD30
- Fáilte Ireland, Paul Kelly, CEO, Fáilte Ireland, 88 - 95 Amiens Street, Dublin 1, D01 WR86
- The Health Service Executive, Health Service Executive, Paul Reid, CEO, Dr. Stevens' Hospital, Dublin 8
- The Heritage Council, Áras na hOidhreachta, Church Lane, Kilkenny, R95 X264.

- The Health and Safety Authority, HSA, Head Office, The Metropolitan Building, James Joyce Street, Dublin 1, D01 K0Y8
- Inland Fisheries Ireland, 3044 Lake Dr, Cheeverstown, Dublin, Citywest Business Campus, Dublin D24 Y265
- The National Roads Authority, Transport Infrastructure Ireland, Parkgate Business Centre, Parkgate Street, Dublin 8, D08 DK10,
- An Taisce — the National Trust for Ireland, Tailors' Hall, Back Lane, Dublin, D08 X2A3, Ireland
- Irish Water, Colvill House, Talbot Street, Co Dublin.

Other Bodies

- An Taisce Dún Laoghaire Rathdown County,
- Various
- Environmental Health Office
- Public Participation Network (PPN) - Approximately 600 groups
- Comhairle na nÓg
- Business Associations
- DLR-Local Enterprise Office (LEO)
- An Garda Síochána, An Garda Síochána Headquarters Phoenix Park, Dublin 8, D08 HN3X
- Bord Gáis, 1 Warrington Place Dublin 2
- Iarnród Éireann, Connolly Station Amiens Street Dublin 1
- IDA Ireland, Three Park Place Hatch Street Upper Dublin 2
- Elected members Dún Laoghaire-Rathdown County Council
- Local TDs and Senators
- Post Primary Schools
- 35 schools

Appendix B: Submissions Received in Numerical Order

Sub. No.	Name	Organisation
A0001	Niamh Bhreathnach	
A0002	Brian Hefferon	
A0003	Paul Griffin	
A0004	Barry Cogan	
A0005	Fiona Bourke	
A0006	Health and Safety Authority	Health and Safety Authority
A0007	Kieron Wood	
A0008	Gregory R Devlin	
A0009	Ruairi McKenna	
A0010	Enda Brady	Department of Communications, Climate Action & Environment
A0011	John Rohan	
A0012	Irene O'Mara	
A0013	Adam Boland	1996
A0014	Roger Garland	Keep Ireland Open
A0015	Brendan Fitzsimons	
A0016	Marjorie O'Farrell Bolten	
A0017	Gabrielle Lowe	
A0018	Eric Moylan	
A0019	David Galvin	Environmental Protection Agency
A0020	Azwar Fuard	
A0021	Gary Watts	10th Kiltarnan Scout Group
A0022	Pauline Riordan	Eastern and Midland Regional Assembly
A0023	Brian Longobardi	
A0024	John Scottus School	Board of Management - John Scottus School
A0025	Brid Meehan	Old Connaught and District Community Association
A0026	Shane Fitzgibbon	
A0027	Alan Doyle and Niamh O'Regan-Doyle	
A0028	Karen Donovan	Office of Public Works

Sub. No.	Name	Organisation
A0029	Roma Birutyte	
A0030	Fergal MacCabe	
A0031	Dún Laoghaire Business Association	DLBA - Dún Laoghaire Business Association
A0032	Mary Connolly Secretary	Protect Marlay Park
A0033	Simone Sav	St. Michael's Rowing Club Dún Laoghaire
A0034	Peter Fry	N/A
A0035	Gavin Harte	
A0036	Rachel Daly	Corbawn Area Residents Association (CARA)
A0037	Hanna Loughnane	Beechville Properties
A0038	Liam Owens	Dún Laoghaire Harbour Representative Group
A0039	Alan McDonnell	Ballinteer Road Partnership
A0040	Raymond O'Malley	Jackson Way Properties Ltd.
A0041	Al O'Tuathaigh	
A0042	Trevor Matthews	
A0043	Barry MacNeaney	Dún Laoghaire Combined Clubs DLCC
A0044	Wessel Vosloo	Kingscroft Developments Limited
A0045	Siobhan Fitzpatrick	Health Service Executive Health and Well Being
A0046	Paul Byrne	
A0047	Niamh McDonald	Irish Water
A0048	Helena Gavin	Cosgrave Developments
A0049	Pat O'Loughlin	Old Connaught House Management Co. CLG
A0050	Patrick Davey	SAGE, Shankill Action for a Green Earth
A0051	Jenny McKell	
A0052	Niamh Connolly	NCBI
A0053	John Murphy	Disability Consultation Group (DCG)
A0054	Anne Keenan	Environmental Health Dept - HSE
A0055	Mr F J Moran	Mount Merrion Residents Association
A0056	Catherine O'Toole	NA

Sub. No.	Name	Organisation
A0057	Tomas Bradley	EirGrid
A0058	Judith Dunne	DLR_braystop5g
A0059	Tony McCarthy	
A0060	Tara Fitzpatrick	
A0061	John Spain Associates (On behalf of Anthony and Mary Collins)	John Spain Associates
A0062	Head of Land Use	Transport Infrastructure Ireland
A0063	Julie Mulleady	JCDecaux Ireland
A0064	Rachel McConnell	
A0065	Phoebe Duvall	An Taisce
A0066	Paul and Katrin O'Shea	n/a
A0067	Maurice O'Dea	n/a
A0068	Wendy Walker	
A0069	Orla Dutter	
A0070	Marsham Court Residents Association	
A0071	Michael Redmond	
A0072	Carol Scott	
A0073	Michael Shanahan	N/A
A0074	Una O'Shea	Roebuck Residents' Association
A0075	Reinhard Dutter	
A0076	Dara Carroll	Joint submission Cabinteely FC Cabinteely AC Foxrock Cabinteely GAA Seapoint RFC
A0077	Oisín Doyle	
A0078	Aaron Moore	N/A
A0079	Marian O'Shea	
A0080	Reg McCabe	Mr
A0081	Brendan	
A0082	Kevin McFall	Mr
A0083	Roy Harford	UCD Planning & Environmental Policy Society
A0084	Tom Feeney	Blackrock Business Network

Sub. No.	Name	Organisation
A0085	Declan Brassil & Co. Ltd.	PJ Hegarty & Sons Ltd.
A0086	Tony Manahan	Denis Brennan, Sea Lodge, Strand Road, Killiney, Co. Dublin
A0087	Sadbh Quinn	Department of Transport, Tourism and Sport
A0088	Luke Martin, RPS Group	Cosgrave Property Group
A0089	Susan McDonnell and Danielle Byrne	Bullock Harbour Preservation Association
A0090	Andrew Parkes	An Taisce South County Dublin Association
A0091	Tony Manahan	Clarendon Properties,
A0092	Patrick Brophy	Individual
A0093	Saoirse Kavanagh	Blackrock Clinic Ltd
A0094	Simon Clear & Associates	Explorium Limited
A0095	John Spain Associates	The Jackson Family, C/O Goodrock Project Management Limited
A0096	Simon Clear & Associates	Tony Deane of Deane Homes Ltd, BCKD Ltd, Maplewood Homes, Heatherbrook Homes
A0097	Lyn Hagin Meade	Dublin Rathdown Greens and Dún Laoghaire Greens
A0098	Conor Battigan	Sandyford BID CLG T/A Sandyford Business District
A0099	McCutcheon Halley Planning Consultants	On Behalf of Aulagh Construction Ltd.
A0100	Tom Halton	Dundrum2030
A0101	Shane Dineen	Fáilte Ireland - National Tourism Development Authority
A0102	Brendan Buck BPS	Ardilea Residents' Association
A0103	Dún Laoghaire-Rathdown Public Participation Network (PPN)	Dún Laoghaire-Rathdown Public Participation Network (PPN)
A0104	Jim Brogan, Kavanagh Mansfield	Foxrock Golf Club
A0105	Colm Cummins	Electricity Supply Board
A0106	John Spain Associates	IPUT plc
A0107	John Spain Associates	IPUT plc
A0108	Blaine Cregan (John Spain Associates)	Ronan Group Real Estate
A0109	Tony Manahan	The Society of the Sacred Heart (Irish/Scottish Province)
A0110	Jim Brogan	Dublin GAA County Board
A0111	Nicky Casey	McGill Planning
A0112	Mary Mac Mahon	Land Development Agency

Sub. No.	Name	Organisation
A0113	Sheila Moore	Foxrock Area Community & Enterprise Limited
A0114	Fiona O'Connor	Gas Networks Ireland
A0115	Brock McClure	Kouchin Holdings
A0116	Peter LeFroy	innogy Renewables Ireland Limited
A0117	Brock McClure	Winterbrook Homes (MSM) Ltd
A0118	John Valentine	
A0119	Brock McClure	Clos Nua Ltd
A0120	John Spain Associates	The Congregation of Christian Brothers
A0121	Brock McClure	Kennedy Wilson
A0122	McCutcheon Halley Planning	Cairn Homes
A0123	McGill Planning Limited on behalf of Alanis Capital	Alanis Capital
A0124	John Spain Associates	Hines APG
A0125	John Spain Associates	Park Developments and Castlethorn Construction
A0126	Trevor Sadler	Aldgate Developments
A0127	John Spain Associates	Airfield Estate
A0128	John Spain Associates	Park Developments
A0129	Marian O'Donnell	Dublin Chamber
A0130	Maude Ní Bhrolcháin	Office of the Planning Regulator
A0131	Tom Merriman	
A0132	Cynthia O'Mahony	private citizen
A0133	Frances Kelly	Dún Laoghaire Central Residents Association
A0134	Alan Hanlon	Department of Education & Skills
A0135	Philip Healy	NA
A0136	Teresa Flynn	
A0137	DLR Chamber of Commerce	DLR Chamber of Commerce
A0138	Sorcha O'Reilly	
A0139	Liam Madden	Sandycove and Glasthule Residents Association
A0140	Aileen Eglington	Dublin South FM community radio

Sub. No.	Name	Organisation
A0141	Patrick O'Shea	n/a
A0142	Killiney Estates	Killiney Estates Ltd
A0143	Justin Tuite	Clarinda Park Residents Association
A0144	Niall O'Byrne	Marlet Property Group Limited
A0145	Rose-Mary McLaughlin	
A0146	Ann-Maria Griffin-Lucey	n/a
A0147	Edel Kennedy	
A0148	Sinead O'Brien- DAU	Department of Culture Heritage and the Gaeltacht
A0149	Robert Parkinson	National Transport Authority
A0150	Cliona Buckley	
A0151	Dr Wendy Cox	Imagine Dundrum

**Appendix C: Principal International, National, Regional and Local Policy Documents, Guidelines and Plans
that will Help Inform and Guide the Preparation of the New Development Plan**

International Policy and Directives

- UN (1992) The Convention on Biological Diversity (CBD)
- UNESCO (1972) The Convention for the Protection of the World Cultural and Natural Heritage
- Council of Europe (1996) The Pan-European Biological and Landscape Diversity Strategy
- Council of Europe (1996) The European Landscape Convention 2000.
- EU Marine Strategy Framework Directive (MSFD)
- EU The Marine Spatial Planning Directive (MSP)
- EU Water Framework Directive (WFD)
- EU Floods Directive
- EU Strategic Environmental Assessment Directive
- EU Urban Waste Water Treatment Directive
- EU Birds Directive and Habitats Directives
- EU Nitrates Directive
- EU Environmental Noise Directive
- EU Green Infrastructure Strategy
- UN (2015) Paris Agreement
- UN (2015) 2030 Agenda for Sustainable Development (including Sustainable Development Goals)
- EU 2020 and 2030 climate and energy targets as well as longer term 2040 and 2050 milestones and targets
- Covenant of Mayors for Climate and Energy

National Legislation

- Planning and Development Act and Regulations, 2000 to 2020 (as amended).
- Local Government Reform Act, 2014 (as amended)
- Maritime Area and Foreshore (Amendment) Bill, 2013
- Water Services Acts, 2007 to 2017
- Protection of the Environment Act, 2003
- Wildlife (Amendment) Act 2000
- Architectural Heritage (National Inventory) and Historic Monuments (Miscellaneous Provisions) Act, 1999
- Heritage Act, 1995
- National Monuments Acts, 1930-1994

National Policy

- Government of Ireland (2020) A Roadmap for Social Inclusion: Ambitions, Goals and Commitments 2020-2025
- DCYA (2019) Better Outcomes, Brighter Futures: The National Policy Framework for Children and Young People, 2014-2020
- DHPLG (2019) Draft Revised Wind Energy Development Guidelines
- DTTaS (2019) National Sports Policy 2018 - 2027
- Government of Ireland (2019) Housing Options for Our Aging Population
- Government of Ireland (2019) National Student Accommodation Policy
- Government of Ireland (2019) Climate Action Plan to Tackle Climate Breakdown.
- Housing Agency (2019) Designing Housing to Meet the Needs of All
- Government of Ireland (2018) Project Ireland 2040 – National Development Plan 2018-2027
- Government of Ireland (2018) Project Ireland 2040 – National Planning Framework
- Government of Ireland (2018) Implementation Roadmap for the National Planning Framework
- Government of Ireland (2018) National Vacant Housing Reuse Strategy 2018-2021
- Government of Ireland (2018) River Basin Management Plan 2018 - 2021
- Housing Agency (2018) Rebuilding the Irish Neighbourhood
- Housing Agency and Urban Agency (2018) Quality Apartments and Urban Housing
- DCCAIE (2018) National Adaptation Framework: Planning for a Climate Resilient Ireland
- DHPLG (2018) Sustainable Urban Housing, Design Standards for New Apartments: Guidelines for Planning Authorities
- DHPLG (2018) Urban Development and Building Heights: Guidelines for Planning Authorities
- DHPLG (2018) Guidelines for Local Authorities and An Bord Pleanála on Carrying Out Environmental Impact Assessments
- DHPLG (2018) Draft Water Services Guidelines for Planning Authorities
- DCCAIE (2017) National Mitigation Plan 2017
- DCCAIE (2017) Energy Efficiency Action Plan for Ireland #4 2017-2020
- DHPCLG (2017) Part V of the Planning and Development Act: Guidelines
- DHPCLG (2017) Interim Guidelines for Planning Authorities on Statutory Plans Renewable Energy and Climate Change
- DCCAIE (2016) Our Sustainable Future Progress Report 2015
- DHPCLG (2016) Strategy for the Rental Sector
- DOH (2016) Obesity Policy and Action Plan - A Healthy Weight for Ireland
- Government of Ireland (2016) Rebuilding Ireland Action Plan for Housing and Homelessness
- DoTTS, DoH (2016) National Physical Activity Plan
- DCENR (2015) Ireland's Transition to a Low Carbon Energy Future
- DECLG (2015) Sustainable Urban Housing, Design Standards for New Apartments: Guidelines for Planning Authorities

- Irish Water (2015) Water Services Strategic Plan
- DAHG (2014) National Landscape Strategy for Ireland
- DECLG (2014) Social Housing Strategy 2020: Support, Supply and Reform
- DCENR (2013) National Digital Strategy for Ireland
- DECLG (2013) Local Area Plans: Guidelines for Planning Authorities
- DECLG (2013) Manual for Local Area Plans
- DECLG (2013) Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment
- DECLG (2013) Development Contributions: Guidelines for Planning Authorities
- DECLG (2019) Design Manual for Urban Roads and Streets
- DECLG (2013) Homelessness Policy Statement
- DOH (2013) National Physical Activity Plan – Get Ireland Active
- DOH (2013) National Positive Aging Strategy
- DECLG (2012) Spatial Planning and National Roads: Guidelines for Local Authorities
- DECLG (2012) Retail Planning: Guidelines for Planning Authorities
- DECLG (2012) Retail Design Manual
- DECLG (2012) Section 261A of the Planning Act and Development Act: Guidelines for Planning Authorities
- DECLG (2012) A Resource Opportunity – Waste Management Policy in Ireland
- DECLG (2012) Our Sustainable Future – A Framework for Sustainable Development for Ireland
- DCENR (2012) Renewable Energy Strategy 2012-2020
- DoT (2012) Smarter Travel: A New Transport Policy for Ireland 2009-2020
- DoT (2012) Traffic Management Guidelines
- NDA (2012) Building for Everyone: A Universal Design Approach
- DECLG (2011) Managing Unfinished Housing Developments Guidance Manual
- DECLG (2011) National Housing Strategy for People with a Disability 2011-2016
- DECLG (2011) Drainage and Reclamation of Wetlands: Draft Guidelines for Planning Authorities
- DEHLG (2011) Architectural Heritage Protection: Guidelines for Planning Authorities
- NDA and DAHG (2011) Access: Improving the Accessibility of Historic Buildings and Places
- NTA (2011) National Cycle Manual
- DEHLG (2010) Guidance Note on Core Strategies
- Government of Ireland (2010) The National Renewable Energy Action Plan
- DEHLG (2009) Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities
- DEHLG (2009) The Planning System and Flood Risk Management: Guidelines for Planning Authorities

- DEHLG (2009) Sustainable Residential Development in Urban Areas (Cities, Town and Villages): Guidelines for Planning Authorities
- DEHLG (2009) Urban Design Manual A Best Practice Guide
- DoT (2009) - National Cycle Policy Framework
- DEHLG, DES (2008) The Provision of Schools and the Planning System: A Code of Practice
- UCD, DLR and Fingal County Council (2008) Green City Guidelines
- DEHLG (2007) Development Management: Guidelines for Planning Authorities
- DEHLG (2007) Development Plans DEHLG (2005) - Sustainable Rural Housing
- DEHLG (2007) National Climate Change Strategy 2007-2012
- DEHLG (2006) Wind Energy Development: Guidelines for Planning Authorities
- DEHLG (2005) Sustainable Rural Housing: Guidelines for Planning Authorities
- DEHLG (2004) Implementation of the SEA Directive: Guidelines for Regional Authorities and Planning Authorities
- DEHLG (2004) Quarries and Ancillary Activities: Guidelines for Planning Authorities
- NDA (2004) National Disability Strategy
- DAHGI (2002) National Heritage Plan
- DEHLG (2003) Architectural Heritage: Protection for Places of Public Worship: Guidelines for Planning Authorities
- DEHLG (2003) Funfair and Fairground Equipment: Guidelines for Planning Authorities
- DOELG (2001) Childcare Facilities: Guidelines for Planning Authorities
- DEHLG (2000) Draft Landscape and Landscape Assessment: Guidelines for Planning Authorities
- DAHGI (1999) Framework and Principles for the Protection of the Archaeological Heritage
- DOELG (1996) Telecommunications Antennae Support Structures: Guidelines for Planning Authorities
- DOE (1994) Tree Preservation: Guidelines for Planning Authorities

Regional Plans and Policy

- EMRA (2019) Regional Spatial and Economic Strategy 2019-2031
- Government of Ireland (2018) Action Plan for Jobs
- Dublin Local Authorities (2018) Dublin Environmental Noise Action Plan 2018-2023
- DRHE (2018) Homelessness Action Plan 2019-2021
- DBEI (2016) Regional Action Plan for Jobs: Dublin 2016 to 2018
- NTA (2016) Transport Strategy for the Greater Dublin Area 2016-2035
- EMWR (2015) Eastern-Midlands Region Waste Management Plan 2015-2021
- OPW (2012-present) Eastern CFRAM Study
- Dublin Local Authorities (2009) Dublin Regional Air Quality Management Plan 2009-2012

- DMERA (2008) Retail Planning Strategy for the Greater Dublin Area 2008-2016
- Dublin City Council (2005) Greater Dublin Strategic Drainage Study

DLR Plans and Policy

- DLR (2020) Corporate Plan 2020-2024
- DLR (2019) Climate Change Action Plan
- DLR (2019) Dún Laoghaire-Rathdown Traveller Accommodation Programme (TAP) 2019-2024
- DLR (2019) Ballyogan Local Area Plan
- DLR (2019) Draft Bullock and Sandycove Harbours Draft Masterplan
- DLR (2019) Report Indicating the Programme of Capital Projects Proposed 2020-2022
- DLR (2019) Road Maintenance Programmes 2019-2021
- DLR LCDC (2019) Dún Laoghaire-Rathdown Healthy County Plan 2019-2022
- DLR (2018) Culture and Creativity Strategy 2018-2022
- DLR (2018) Litter Management Plan 2018-2020
- DLR (2018) Public Art Policy 2018-2025
- DLR (2018) Stillorgan Local Area Plan
- Dún Laoghaire-Rathdown Sports Partnership (2018) County Sports Participation Strategy
- DLR (2017) Three Year Capital Programme 2018-2020
- DLR (2017) Space to Play: Sports Facility Strategy 2017-2022
- DLR (2017) Tourism Strategy and Marketing Plan 2017-2022
- DLR (2017) Vacant Homes Action Plan 2017-2020
- DLR (2017) Woodbrook Shanganagh Local Area Plan
- DLR (2016) Anti-Social Behaviour Strategy 2016-2022
- DLR (2016) Arts Development Plan
- DLR (2016) Age Friendly Strategy
- DLR (2016) Dún Laoghaire-Rathdown County Development Plan 2016-2022 (including variations)
- DLR (2016) Library Development Plan 2016-2020
- DLR (2016) Local Economic and Community Plan 2016-2021
- DLR JPC (2016) Joint Policing Committee 6 Year Strategy 2016-2021
- DLR (2015) Strategic Plan for Housing Persons with Disabilities
- DLR (2015) Blackrock Local Area Plan
- DLR (2015) Development Contribution Scheme 2016-2020

- DLR (2015) Spatial Energy Demand Analysis
- DLR (2014) Cherrywood Strategic Development Zone Planning Scheme
- DLR (2013) Heritage Plan 2013 to 2019: Contributing towards Quality of Life
- DLR (2013) Kiltiernan-Glenamuck Local Area Plan
- DLR (2012) Integration Strategy and Action Plan 2012-2015
- DLR (2012) Goatstown Local Area Plan
- DLR (2011) Tree Strategy 2011-2015
- DLR (2011) Housing Allocations Scheme
- Dún Laoghaire Harbour Company (2011) Dún Laoghaire Harbour Master Plan
- DLR (2010) Deansgrange Local Area Plan
- DLR (2009) Biodiversity Plan
- DLR (2008) Glencullen Local Area Plan
- DLR (1999) Stepside Action Plan

Note: This list is not exhaustive and additional documents will help inform and guides the preparation of the Draft County Development Plan. A full list of the acronyms for the bodies referred to above along with their full titles is provided below. In the interests of clarity, the list indicates whether the title of the relevant Government Department is currently in use, or whether it has been superseded.

DAHG:	Department of Arts, Heritage and the Gaeltacht (superseded)
DAHGI:	Department of Arts, Heritage, Gaeltacht and the Islands (superseded)
DBEI:	Department for Business, Enterprise and Innovation (in use)
DCCAE:	Department of Communications, Climate Action and Environment (in use)
DCENR:	Department of Communications, Energy and Natural Resources (superseded)
DCYA:	Department of Children and Youth Affairs (in use)
DECLG:	Department of the Environment, Community and Local Government (superseded)
DEHLG:	Department of the Environment, Heritage and Local Government (superseded)
DELG:	Department of the Environment and Local Government s (superseded)
DES:	Department of Education and Skills (in use)
DHPCLG:	Department of Housing, Planning, Community and Local Government (superseded)
DHPLG:	Department of Housing, Planning and Local Government (in use)
DLR:	Dún Laoghaire-Rathdown County Council
DLR JPC:	Dún Laoghaire-Rathdown Joint Policing Committee
DLR LCDC:	Dún Laoghaire-Rathdown Local Community Development Committee

DLR CYPSC:	Dún Laoghaire-Rathdown Children and Young People's Services Committee
DMERA:	Dublin Regional Authority and Mid-East Regional Authority
DOE:	Department of the Environment s (superseded)
DOH:	Department of Health (in use)
DOT:	Department of Transport (superseded)
DRHE:	Dublin Regional Homeless Executive
DTTaS	Department of Transport, Tourism and Sport (in use)
EMRA:	Eastern and Midland Regional Authority
EMWR:	Eastern-Midlands Waste Management Region
EU:	European Union
NDA:	National Disability Authority (in use)
NTA:	National Transport Authority (in use)
UCD:	University College Dublin
UN:	United Nations
UNESCO:	United Nations Educational, Scientific and Cultural Organisation

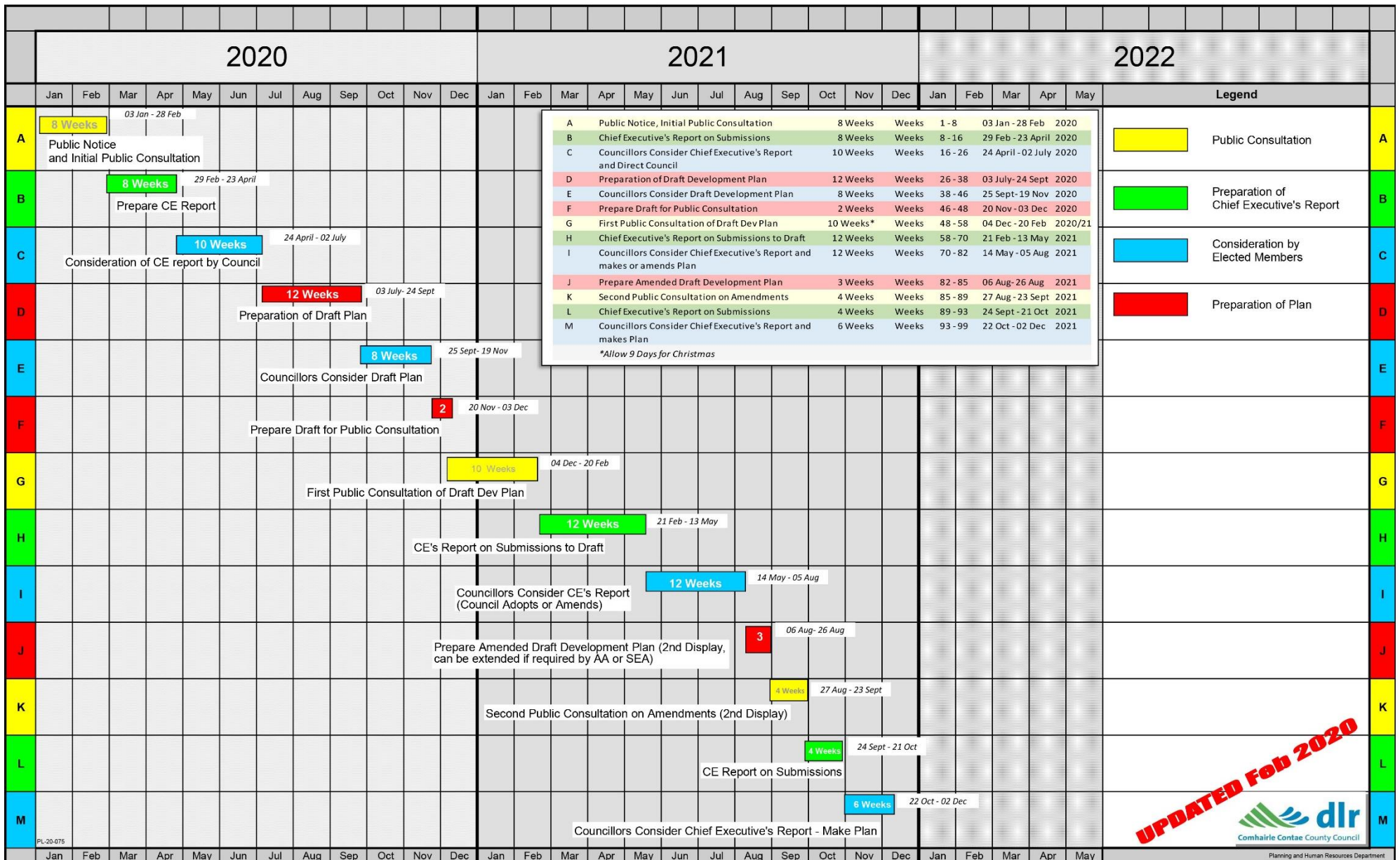
Appendix D: Mandatory Requirements for Development Plan

In accordance with Section 10 of the Planning and Development act, 2000 (as amended), a County Development Plan must:	
1.	Set out an overall strategy for the proper planning and sustainable development of the areas of the County Development Plan and shall consist of a written statement and a plan or plans indicating the development objectives for the area in question.
2.	Include a core strategy demonstrating that development objectives in the County Development Plan are consistent with, as far as practicable, national and regional development objectives set out in the National Planning Framework (NPF), the Regional Spatial and Economic Strategy (RSES), and with Specific Planning Policy Requirements (SPPR) specified in planning guidelines.
3.	Have regard to the County Development Plans of adjoining Planning Authorities.
4.	Include a statement which shows that the development objectives in the County Development Plan are consistent with, as far as practicable, the conservation and protection of the environment.
5.	Include objectives for:
a)	The zoning of land for particular purposes (whether residential, commercial, industrial, agricultural, recreational, as open space or otherwise, or a mixture of these uses) where and to such an extent as the proper planning and sustainable development of the area requires these uses to be indicated.
b)	The provision, or facilitation of the provision, of infrastructure including: <ul style="list-style-type: none"> • Transport, energy and communication facilities, • Water supplies and waste water services (regard having being had to the water services strategic plan for the area made in accordance with the Water Services Act 2007) (A new water services strategic plan will be prepared by Irish Water in accordance with the Water Services Act 2013), • Waste recovery and disposal facilities (regard being had to the waste management plan for the area made in accordance with the Waste Management Act 1996), and Any ancillary facilities or services
c)	The conservation and protection of the environment including the archaeological and natural heritage and the conservation and protection of European Sites and any other sites which may be prescribed for the purposes of this paragraph.
d)	The encouragement, pursuant to Article 10 of the Habitats Directive, of the management of features of the landscape, such as traditional field boundaries, important for the ecological coherence of the Natura 2000 network and essential for the migration, dispersal and genetic exchange of wild species
e)	The promotion of compliance with environmental standards and objectives established: <ul style="list-style-type: none"> • For bodies of surface water, by the European Communities (Surface Water Regulations 2009), • For Groundwater, by the European Communities (Groundwater) Regulations 2010.
f)	The integration of planning and sustainable development with the social, community and cultural requirements of the area and its population
g)	The preservation of the character of the landscape where, and to the extent that, in the opinion of the planning authority, the proper planning and sustainable development of the area requires it, including the preservation of views and prospects and the amenities of places and features of natural beauty or interest including views and prospects.
h)	The protection of structures or parts of structures, which are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest

	i)	The preservation of the character of Architectural Conservation Areas.
	j)	The renewal of areas identified having regard to the core strategy, that are in need of regeneration
	k)	The provision of accommodation for travellers, and the use of particular areas for that purpose.
	l)	The preservation, improvement and extension of amenities and recreational amenities.
	m)	The control having regard to the provision of the Major Accidents Directive and any Regulations, under any enactment, giving effect to that Directive of: <ul style="list-style-type: none"> • Siting of new establishments, • Modification of existing establishments, and • Development in the vicinity of such establishments, for the purposes of reducing the risk or limiting the consequences of a major accident.
	n)	The provision of, or facilitation of the provision, of services for the community, including schools, crèches and other education and childcare facilities.
	o)	The promotion of sustainable settlement and transportation strategies in urban and rural areas including the promotion of measures to: <ul style="list-style-type: none"> • Reduce energy demand in response to the likelihood of increases in energy and other costs due to long term decline in non-renewable resources, • Reduce anthropogenic greenhouse emissions, and • Address the necessity of adaptation to climate change.
	p)	In particular having regard to location, layout and design of new development.
	q)	The preservation of public rights of way which give access to seashore, mountain, lakeshore, riverbank or other place of natural beauty or recreational utility, which right of way shall be identified both by marking them on at least one of the maps forming part of the County Development Plan and by indicating their location on a list appended to the County Development Plan
	r)	Landscape, in accordance with relevant policies or objectives for the time being of the Government or any Minister of the Government relating to providing a framework for identification, assessment, protection, management and planning of landscape and developed having regard to the European Landscape Convention held in Florence in October 2000.
6.		Include a strategy (the Housing Strategy) for ensuring that the proper planning and sustainable development of the County provides for the housing of the existing and future population of the County.
7.		Includes policies and proposals for retail development in accordance with any guidelines that relate to retail development.
8.		Include a settlement hierarchy and indicate areas for which it is intended to prepare a local area plan.
9.		Incorporate an Environment Report resulting from a Strategic Environment Assessment of the Plan.
10.		There are also additional optional objectives, which may be included in the Plan. These are set out in the First Schedule of the Act and include objectives relating to the location and pattern of development, control of areas and structures, community facilities, environment and amenities, infrastructure and transport.

Appendix E: Development Plan Timetable

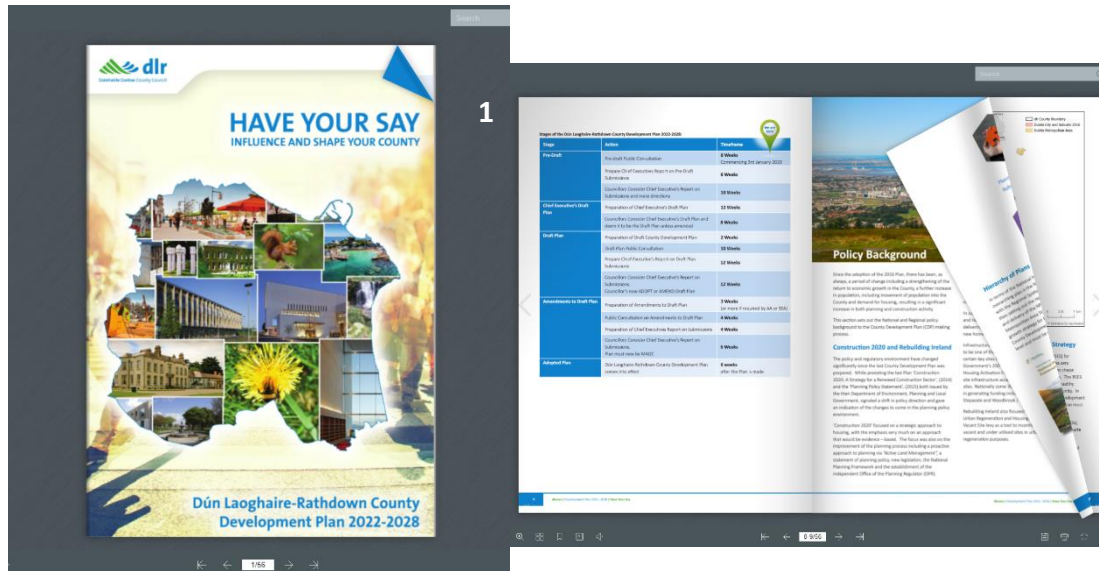
Please note time line may change due to current COVID-19 health measures.




Appendix F: Pre-Draft Public Consultation

As set out under Section 1.3 Pre-Draft Consultation Process in the Introduction to the Chief Executive’s Report, the Pre-Draft (‘Have Your Say’) consultation stage ran from 3rd January until 28th February 2020. During this time, a number of methods were employed to ensure that the process was made available to as many DLR residents as possible, including:

- Publication of a statutory advertisement in national and local press.
 - The publication of a ‘Have Your Say’ document which was available to view on the Council’s website as both a flipbook / ezine and in PDF format.
 - In hard copy at public counters in County Hall and in Dundrum Council Offices.
 - In hard copy at all public libraries.
- Creation of an online Story Map providing a summarised version of the ‘Have Your Say’ document.
- Roll out of a bus stop advertisement campaign.
- Targeted ‘press release’ via Social Media (Instagram, Twitter and Facebook).
- Six Public Open Days across the County.



Return to Contents


www.dlrccoco.ie

NOTICE OF THE INTENTION TO REVIEW THE DÚN LAOGHAIRE-RATHDOWN COUNTY DEVELOPMENT PLAN 2016 – 2022 AND TO PREPARE A NEW DÚN LAOGHAIRE-RATHDOWN COUNTY DEVELOPMENT PLAN 2022 – 2028

Notice is hereby given in accordance with Part 2 Section 91 (1) of the Planning and Development Act 2000 (as amended) that Dún Laoghaire-Rathdown County Council intends to review the existing Dún Laoghaire-Rathdown County Development Plan 2016–2022 and to prepare a new Dún Laoghaire-Rathdown County Development Plan 2022–2028. The new County Development Plan shall be strategic in nature for the purposes of developing (a) the objectives and policies to deliver an overall strategy for the proper planning and sustainable development of the area of the Development Plan and (b) the Core Strategy. It shall also take account of the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.

STRATEGIC ENVIRONMENT ASSESSMENT AND APPROPRIATE ASSESSMENT
 In compliance with the Strategic Environmental Assessment Directive (2001/42/EC) and in accordance with Article 19B of the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436 of 2004) (as amended), the Planning Authority proposes to carry out a Strategic Environmental Assessment (SEA) as part of the review of the existing Development Plan and preparation of a new Development Plan. For this purpose, the Planning Authority will prepare an Environmental Report of the likely significant effects on the environment of implementing the new Plan. The provisions of Articles 13C to 13J of Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436 of 2004) (as amended) shall also apply.

Pursuant to the requirements of Article 6 of the Habitats Directive (92/43/EEC), a Stage One Screening for Appropriate Assessment (AA) shall be carried out as part of the overall process and subsequent stages of AA shall be carried out, if required.

PUBLIC CONSULTATION AND ‘HAVE YOUR SAY’ DOCUMENT
 The Council is encouraging members of the general public, local businesses, residents associations, community organisations and schools to have a say in influencing and helping to frame the general direction the next County Development Plan might take. Public inputs at the start of the Plan-making process are vitally important to ensure the finished Plan reflects public concerns and aspirations.

To assist this process, and to help stimulate public debate, a document entitled ‘Have Your Say’ has been prepared. This document gives a broad overview of the main development issues currently impacting on Dún Laoghaire-Rathdown and identifies the kind of planning matters the next County Development Plan could address.

The document is available to download from the Council’s website www.dlrccoco.ie
 The ‘Have Your Say’ document will be available to view at the following locations:

- Planning Department, County Hall, Dún Laoghaire (between 10.00am and 4.00pm)
- Council Offices, Dundrum Office Park, (from 9.30am to 12.30pm and 1.30pm to 4.30pm) on **Monday to Friday (excluding Bank Holidays) from Friday 3rd January, 2020 to Friday 28th February 2020 (inclusive).**

The document may also be inspected at all Branches of Dún Laoghaire-Rathdown Libraries.

A series of Public Information Sessions - to be attended by Planning Officials - are scheduled for the following dates and venues:

Venue	Date	Time
County Hall Marine Road Dún Laoghaire	21st January 2020	2pm-8pm
Dundrum Council Offices, Dundrum Office Park, Main Street, Dundrum, Dublin 14	23rd January 2020	2pm-8pm
Blackrock Library, Main Street, Blackrock	28th January 2020	2pm-8pm
Stillorgan Library, St. Laurence’s Park, Stillorgan, Co. Dublin	30th January 2020	2pm-8pm
Shanganagh Park House, Rathslallah Avenue, Shankill, Dublin 18	11th February 2020	2pm-8pm
Samuel Beckett Civic Campus, Ballyogan Road, Dublin 18	13th February 2020	2pm-8pm


SUBMISSIONS/OBSERVATIONS
 Dún Laoghaire-Rathdown County Council hereby invites any interested parties to make submissions or observations with regard to the review of the existing Dún Laoghaire-Rathdown County Development Plan 2016–2022 and the preparation of the new Dún Laoghaire-Rathdown County Development Plan 2022–2028 including the SEA and AA process.

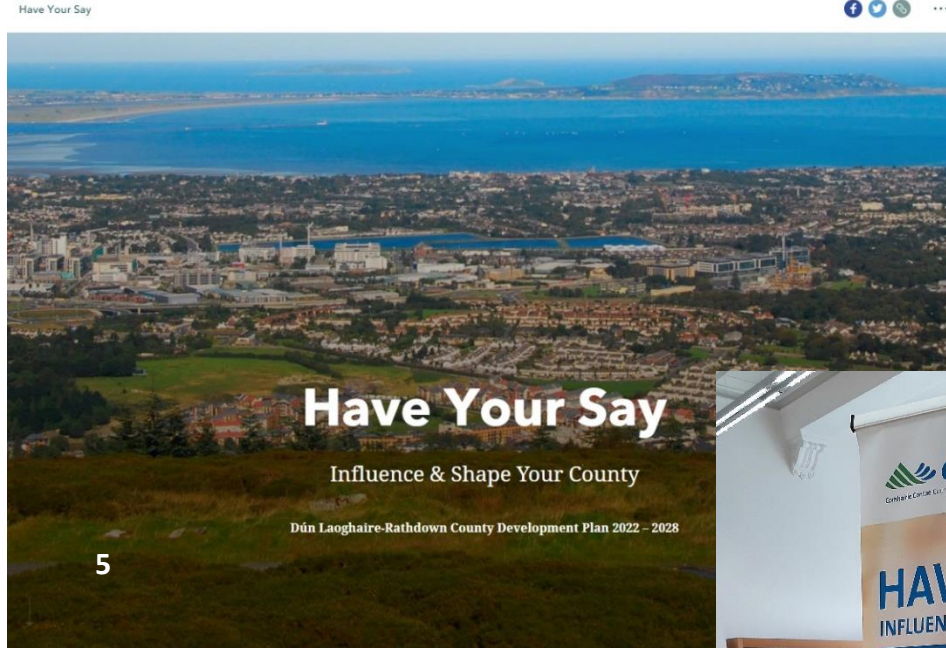
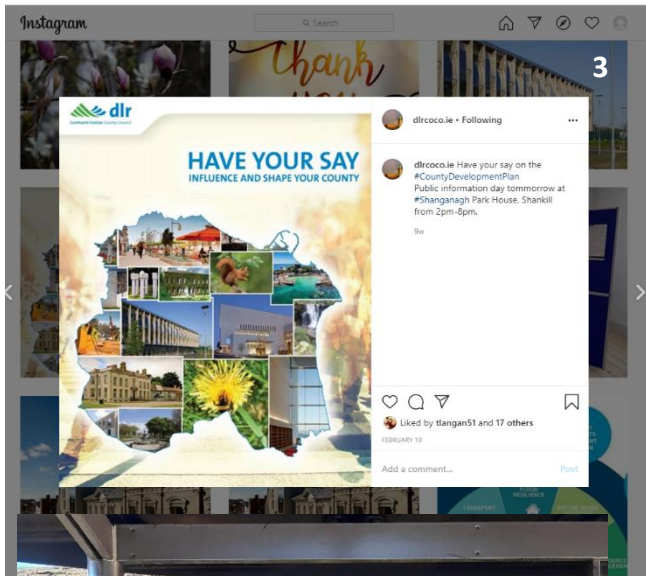
In respect of making a submission or observation please note the following:

- Submissions/observations should include your name and may include address, a map (for identification purposes) and, where relevant, details of any organisation, community group or company etc., which you represent.
- Submissions/observations regarding objectives and policies to deliver an overall strategy for the proper planning and sustainable development of Dún Laoghaire-Rathdown County may be made in writing within the specified period. Submissions/observations at this stage of the overall Plan-making process should be strategic in nature and focus on ‘big picture’ issues.
- Children, or groups or associations representing the interests of children, are particularly encouraged to make submissions or observations regarding the foregoing.
- As the overall Plan-making process advances the Planning Authority intends to review the zoning of the area of the Development Plan, for the purposes of developing objectives and policies to deliver an overall strategy for the proper planning and sustainable development of (i) the area of the Development Plan, and (ii) the Core Strategy.
- The Council cannot consider at this Pre-Draft stage of the County Development Plan process submissions or observations relating to the zoning and/or rezoning of specific or particular parcels of land. These more detailed matters will be considered during the Draft Plan stage of the overall process - which is approximately 12 months away.
- Please be advised that all submissions received will be published online in accordance with the requirements of the Planning Act. You should ensure that no vexatious, libellous or confidential information, including confidential information relating to a third party (in respect of which the third party has not, expressly or impliedly, in the circumstances, consented to its disclosure) is included in your submission. The Planning Authority reserves the right to redact any submission or part thereof that does not comply with this requirement. Please be advised that the submission will be published in full.

A written submission can be made electronically through dlr Consultation Hub via Citizen Space:
<https://dlrccoco.citizenspace.com/planning/cdp-2022-2028-pre-draft>
 Or by hard copy addressed to:
Administrative Officer, DLR County Development Plan, Planning Department, Dún Laoghaire-Rathdown County Council, County Hall, Marine Road, Dún Laoghaire, Co. Dublin
NOTE: Please make your submission by one medium only i.e. hard copy/website.
The final date for receipt of submissions is Friday 28th February 2020. Please note Late Submissions will not be considered

**Mary Haney, Director of Services
 Planning Department** **3rd January 2020.**


www.dlrccoco.ie



- 1: 'Have Your Say' Flipbook/eZine
- 2: Newspaper Notice
- 3: Instagram Post
- 4: Bus Shelter - Monkstown
- 5: Story Map
- 6: Open Day - Blackrock

