



Chief Executive's Report on Draft Plan Consultation Volume I

Kiltiernan- Glenamuck Local Area Plan 2025

Chief Executive's Report on Draft Plan Consultation

May 2025

Volume I

Issues Raised and Chief Executive's Responses and Recommendations

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Part 1: Introduction

1.1 Overview

Dún Laoghaire Rathdown County Council is at the Draft stage for the Kiltiernan-Glenamuck Local Area Plan (KGLAP).

The process of preparing a Local Area Plan (LAP) for Kiltiernan-Glenamuck commenced in September 2023 with a four-week Pre-Draft public consultation phase. An 'Issues Paper' was prepared and circulated, and two public information open sessions were held in Kiltiernan Parish Centre. Submissions were invited, and the Executive prepared a report summarising the issues raised in the 109 no. submissions/observations received at pre-draft stage.

The report contained a number of policy recommendations for the Draft Local Area Plan, and, importantly, the report noted that an Area Based Transport Assessment (ABTA) had been commenced and would inform the preparation of the Draft LAP. In addition to an ABTA, a 'Community Audit and Sustainable Neighbourhood Infrastructure Review' was prepared to assess the provision of cultural, civic and community facilities in Kiltiernan - Glenamuck and make recommendations on future requirements, based on best practice.

The first KGLAP was adopted in 2007 and was prepared as a result of the comprehensive rezoning of lands in the 2004 County Development Plan and the objective therein, 'To prepare a Local Area Plan for Kiltiernan'. A second Plan was made in 2013 and was extended until September 2023. As there is no statutory mechanism to further extend the 2013 Plan the Planning Authority has prepared this Draft Local Area Plan to set out the vision and strategic planning framework for growth in the area

which reflects changes to national, regional and local policy in the intervening years.

The Draft Plan has incorporated policy recommendations arising from the pre-draft consultation, recommendations contained within the ABTA and the 'Community Audit and Sustainable Neighbourhood Infrastructure Review'. A number of background papers were prepared, all of which have informed the Draft LAP. Environmental assessments were carried out as follows:

- i. A Strategic Environmental Assessment
- ii. An Appropriate Assessment, and
- iii. A Strategic Flood Risk Assessment.

These environmental assessments form part of the Draft LAP and have informed both policy and objectives set out within the Draft LAP.

The Draft LAP, together with the environmental assessments, was placed on public display for a period of not less than 6 weeks from 6th February to 21st March 2025.

A total of 126 submissions were received and overall, the level of engagement was high and included much positive commentary along with some concerns in relation to certain proposals in the Draft LAP. In a similar vein to the submissions received at pre-draft stage it is clear that the community care strongly about what happens in Kiltiernan-Glenamuck. While many of the issues raised related to the Draft Local Area Plan, there were also

a number of issues raised that related to other service area Plans and operational matters of the Council.

We would like to take the opportunity to thank all those who made submissions and to all who attended and participated in the information webinar and the drop-in sessions in Kiltiernan-Glenamuck. We also wish to thank all the Elected Members who supported and encouraged participation.

1.2 Purpose of the Chief Executive's Report

This Report is submitted to the Members of Dún Laoghaire-Rathdown County Council for their consideration as part of the process for the preparation of the Kiltiernan-Glenamuck Local Area Plan.

This Chief Executive's Report forms part of the statutory procedure for the preparation of a Local Area Plan, as required by Section 20(3)(c)(ii) and (cc) of the Planning and Development Act, 2000 (as amended) and sets out to:

- I. "List the persons who made submissions or observations.
- II. Provide a summary of –
 - (A) the recommendations, submissions and observations made by the Minister, where the notice under paragraph (a) of subsection (2) was sent before the establishment of the Office of the Planning Regulator,
 - (B) the recommendations, submissions and observations made by the Office of the Planning Regulator, and

- (C) the submissions and observations made by any other persons, in relation to the draft local area plan in accordance with this section.
- III. Contain the opinion of the chief executive in relation to the issues raised, and his or her recommendations in relation to the proposed local area plan, amendment to a local area plan or revocation of a local area plan, as the case may be, taking account of the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.
- IV. In the case of each planning authority within the GDA, a report under subparagraph (c)(i) shall summarise the issues raised, and the recommendations made by the DTA in a report prepared in accordance with section 31E and outline the recommendations of the chief executive in relation to the manner in which those issues and recommendations should be addressed in the proposed local area plan."

Members have a period of 6 weeks from the date of receipt to consider the Chief Executive's Report.

As set out in Section 20(3)(d)(ii), following consideration of the Draft Local Area Plan and the Chief Executive's Report, the Members shall, by resolution, having considered the Chief Executive's Report:

- i. "subject to paragraphs (e) to (r), decides to make or amend the plan otherwise than as recommended in the chief executive's report, or
- ii. decides not to make, amend or revoke, as the case may be, the plan".

In the event that material alterations are made to the Draft Local Area Plan, the statutory requirements set out under Section 20(3)(e)-(r) of the Planning and Development Act, 2000 (as amended) shall apply.

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

Section 20(5) of the Planning and Development Act 2000 (as amended) states:

"In this section "statutory obligations" includes, in relation to a local authority, the obligation to ensure that the local area plan is consistent with—

- i. the objectives of the development plan,
- ii. the national and regional development objectives specified in—
 - the National Planning Framework, and
 - the regional spatial and economic strategy, and
- iii. specific planning policy requirements specified in guidelines under subsection (1) of section 28."

1.3 Structure of the Report

The report comprises 2 volumes as follows:

- Volume I - Introduction, Issues Raised and Chief Executive's Responses and Recommendations
- Volume II - Summary and List of Submissions Received

Volume I

Volume I is divided into four parts:

Part 1: Introduction to Chief Executive's Report

- 1.1 Overview.
- 1.2 Purpose of the Chief Executive's Report.
- 1.3 Structure of the Report.
- 1.4 Public Consultation Process.
- 1.5 High level overview of nature of issues raised and recommendations.

Part 2: Summary of the submissions from the Office of the Planning Regulator (OPR) and the National Transport Authority (NTA) and the Chief Executive's response and Recommendation

- a. A summary of the observations, submissions and recommendations made by the Office of the Planning Regulator.
- b. A summary of the issues raised, and the recommendations made by the NTA.
- c. The response of the Chief Executive to the issues raised, taking account the proper planning and sustainable

development of the area, the statutory obligations of any local authority in the area and any relevant policies or objectives of the Government or of any Minister of the Government and, if appropriate, any observations made by the Minister for Arts, Heritage, Gaeltacht and the Islands.

Part 3: Summary of the Issues raised by other persons and the response and recommendations of the Chief Executive

- a. A summary of the issues raised broken down by way of reference to the chapters and appendices of the Draft Local Area Plan.
- b. The Executive's response and any recommendations.

Where an issue raised is not considered to be a Local Area Plan issue this is stated in the response in blue text.

Recommendations for amendments to the Draft LAP are shown by way of red text with deletions shown by way of a ~~strike through~~ and additions shown by way of underlining.

Recommendations in black are matters considered by the Chief Executive and where no change is recommended.

Part 4: Appendices to the Chief Executive's Report

There are 3 appendices as follows:

- a. Appendix 1. Draft Local Area Plan Errata.
- b. Appendix 2. Acronyms.
- c. Appendix 3. Legislative Background.

In order to make the document as user friendly as possible the issues raised have been grouped under a series of umbrella 'headings' which are based on the individual Chapters / Sections, as set out in the Draft LAP.

Volume II

Volume II is divided into 2 parts:

- Part 1 summarises all submissions received.
- Part 2 lists the persons or bodies who made submissions or observations.

Navigation

In each volume of this report there are a number of links and cross references provided to aid navigation both through the report and to documents referred to within the report. Hyperlinked text is identifiable by an underline and will be either blue or black text. Hyperlinks have been provided for:

- All [submissions](#) received.
- Quick links from the contents page to each section are provided and a '[Return to Contents](#)' link is provided at the bottom of each page in Volume I.

Section and page numbers are provided for any reference made to the Draft LAP document.

1.4 Public Consultation

The Draft Local Area Plan 2025 and the Draft Environmental Reports were put on public display for 6 weeks between 6th February and 21st March 2025. Written submissions and/or observations were invited for a 6-week period ending the 21st of March 2025.

During the public consultation period the Council pursued a proactive communications approach in an attempt to raise awareness of the Draft Local Area Plan among the citizens of Kiltiernan-Glenamuck and other interested stakeholders, and by doing so encouraged a greater degree of public participation in the overall process.

The initiatives and measures undertaken by the Council to engage with the public and to promote more inclusive public participation included:

- A detailed public notice being placed in the Irish Times on 6th February 2025 advising of the consultation period, where the Draft LAP could be accessed and inviting submissions to the Draft LAP up to and including the closing date of 21st March 2025.
- A static display of the Draft Local Area Plan was in place for the duration of the 6-week consultation period at:
 - The Concourse, County Hall, Dún Laoghaire (10.00am-4.00pm)
 - Council Offices, Dundrum Office Park (9.30am-12.30pm and 1.30pm-4.30pm).
- The Draft LAP was distributed to and was available upon request in all dlr Library branches.
- The Draft LAP, the environmental reports and background papers were available to view online at the Kiltiernan-Glenamuck LAP webpage: <https://www.dlrcoco.ie/KGLAP2025>
- A video was produced giving a broad overview of the Draft LAP and was published on the Kiltiernan-Glenamuck LAP webpage and on the dlr YouTube channel.
- A virtual room was created and added to the Kiltiernan-Glenamuck LAP webpage.
- A storymap providing an overview of the Draft LAP was created and published on the Kiltiernan-Glenamuck LAP webpage.
- An information poster was prepared and distributed.
- A public webinar was hosted online on the 18th of February 2025. A total of 80 people attended this online information session. The recording of the webinar is available to view Kiltiernan-Glenamuck LAP webpage and on the dlr YouTube channel.
- Two Public Information 'drop-in sessions' were held in the Kiltiernan Parish Centre on the dates listed below:
 - Tuesday 25th February 2025: 4pm – 8pm.
 - Thursday 6th March 2025: 4pm – 8pm.
- Submissions/observations in respect of the Draft LAP were accommodated via hard copy or via the citizens space public consultation portal.

1.5 High level overview of nature of issues raised and recommendations

(Note: This is high level and does not purport to show every amendment proposed. The report should be read in full).

Section	Main Issues Raised	Main Recommended Amendments
Office of the Planning Regulator	<ul style="list-style-type: none"> Overall positive commentary in relation to Draft LAP. One observation in relation to timelines and ownership / leadership to monitor the implementation of key policies and objectives of the Local Area Plan. 	<ul style="list-style-type: none"> Proposed amendments to Chapter 9 in relation to ownership and timelines pertaining to implementation of the Draft LAP.
National Transport Authority	<ul style="list-style-type: none"> Overall positive commentary Recommends that proposed Objective PT3b relating to the provision of Kiltiernan Bus Terminus should be included in the final LTP and LAP as a Short-Term measure. 	<ul style="list-style-type: none"> Proposed amendments to Draft LAP and LTP to ensure provision of Kiltiernan Bus Terminus is included in the final LTP and LAP as a Short-Term measure.
Chapter 1	<ul style="list-style-type: none"> Overall support for Draft LAP 	<ul style="list-style-type: none"> No amendments recommended.
Chapter 2	<ul style="list-style-type: none"> Request for alternative location for proposed park (SDF 11). Request to reduce education site (SDF 9). Request for alterations to height and density parameters in various Site Development Framework areas. 	<ul style="list-style-type: none"> Minor amendment to Site Development Framework policy. Minor amendment to clarify which 110KV line is referenced in Green Instructure Concept of Urban Design and Placemaking Strategy. Minor amendments to SDF3 and 4 regarding access.
Chapter 3	<ul style="list-style-type: none"> Request to update Climate Action and Infrastructure chapter to include National Adaptation Framework of 2024. Request to include reference to ESB publications. 	<ul style="list-style-type: none"> Minor amendment to update Climate Action and Infrastructure chapter to include National Adaptation Framework of 2024. Minor amendments to Appendix 2 to include reference to ESB publications.
Chapter 4	<ul style="list-style-type: none"> Request for alternations to policies on density and height. Request for significant amendments to Objective H1 – Housing for all. 	<ul style="list-style-type: none"> Minor amendment to education section. Minor amendment to Policy KGLAP28 – Overall Residential Density.
Chapter 5	<ul style="list-style-type: none"> Support for and opposition to various proposed permeability links including PY2, PY3, PY4 and PY9. 	<ul style="list-style-type: none"> Minor amendment to update referenced transport policy documents.

Section	Main Issues Raised	Main Recommended Amendments
	<ul style="list-style-type: none"> Requests for improvements to bus provision in the area. Request for improved pathways for all users. 	
Chapter 6	<ul style="list-style-type: none"> Request for various facilities in the village centre. 	<ul style="list-style-type: none"> No amendments recommended.
Chapter 7	<ul style="list-style-type: none"> Issues raised in relation to trees and planting. Request for alterations to wildlife corridors. 	<ul style="list-style-type: none"> Minor amendment to include mention of swift species. Minor amendment to update policy to include mention of Loughlinstown River Riparian Corridor.
Chapter 8	<ul style="list-style-type: none"> Submissions consider that the spelling of Kiltiernan with two letter i's is incorrect and should be spelt 'Kiltiernan'. 	<ul style="list-style-type: none"> No amendments recommended.
Chapter 9	<ul style="list-style-type: none"> Various requests for phasing. 	<ul style="list-style-type: none"> See OPR Recommendation.
Appendices	<ul style="list-style-type: none"> Update reference to SuDS measures. Addition of guidance document to Appendix 2. Welcoming of Draft ABTA/LTP. 	<ul style="list-style-type: none"> Minor amendment to reference SuDS measures contained in Draft LTP. Update list of documents to include additional guidance document.
Other Issues	<ul style="list-style-type: none"> Various requests to extend LAP boundary and rezone lands. 	<ul style="list-style-type: none"> No amendments recommended. Forthcoming housing targets acknowledged in Chief Executive's response.

Part 2: Summary of Submission by the Office of the Planning Regulator and the National Transport Authority and Chief Executive's Responses and Recommendations

2.1 Overview of the Submission, Main Issues Raised and Recommendations Made by the Office of the Planning Regulator

Observations, Submissions and Recommendations	Executive's Response & Recommendation
Office of the Planning Regulator – <u>B071</u>	
2.1.1 Overarching Commentary	
<p>i. Submission sets out the statutory functions of the Office of the Planning Regulator (OPR) with regard to the plan making process stating that the Draft LAP has been assessed under Sections 31AO(1) and 31AO(2) of the Planning and Development Act 2000 (as amended). The assessment of the Draft LAP has had regard to the Dún Laoghaire-Rathdown County Development Plan 2022-2028 (the County Development Plan), the Eastern and Midlands Regional Assembly (EMRA) Regional Spatial and Economic Strategy (RSES) and relevant Section 28 guidelines.</p> <p>Submission states that the planning authority is advised to take action on any 'Observation' and to give full consideration to matters contained within the submission.</p>	<p>The Executive notes the role of the OPR.</p> <p>Recommendation No change to Draft Plan.</p>
<p>ii. The OPR commends the significant work undertaken by the Planning Authority to inform the Draft Local Area Plan including:</p> <ul style="list-style-type: none"> • An Area Based Transport Assessment (ABTA), • Urban Design Report, • Community Audit and Sustainable Neighbourhood Infrastructure Review, • A Demographic and Housing Analysis, • Appropriate Assessment Screening (AA Screening), • SEA Report, and, • Strategic Flood Risk Assessment (SFRA). 	<p>The Executive notes and welcomes the overarching commentary.</p> <p>Recommendation No change to Draft Plan.</p>

Observations, Submissions and Recommendations	Executive's Response & Recommendation
<p>The OPR is satisfied that the key recommendations of these reports have been appropriately reflected in the Draft LAP.</p>	
<p>iii. The OPR states that the Draft LAP sets out a clear and detailed development planning framework for the development of the area over the lifetime of the plan. In particular, the OPR welcomes the preparation and inclusion of:</p> <ul style="list-style-type: none"> • The Urban Design Framework and the detailed 10 individual Site Development Frameworks (SDF's). • Emphasis on the 10-minute neighbourhood concept and measures included in the Draft Plan to implement this, such as: <ul style="list-style-type: none"> ○ Improved sustainable transport, ○ Permeability, ○ Regeneration, ○ Housing provision, ○ Enhanced social and community infrastructure. • The preparation of an ABTA. 	<p>The Executive notes and welcomes the commentary.</p> <p>Recommendation No change to Draft Plan.</p>
<p>iv. The OPR has identified only one matter that requires further consideration under the theme of Implementation and Monitoring (detailed in section 2.1.11).</p>	<p>The Executive notes the issue raised.</p> <p>Recommendation See recommendation under Section 2.1.11 of this report. See section 2.1.11, Implementation and Monitoring.</p>
<p>2.1.2 Consistency with Regional, Spatial and Economic Strategy (RSES).</p>	
<p>i. The OPR considers the Draft Local Area Plan to be generally consistent with the regional policy objectives of the Eastern and Midlands Regional Assembly (EMRA) Regional Spatial and Economic Strategy (RSES). The Draft LAP promotes compact sustainable growth and housing delivery across the plan area which forms part of the Dublin City and Suburbs and is identified as a strategic corridor in the Metropolitan Area Strategic Plan (MASP).</p>	<p>The Executive notes and welcomes the commentary.</p> <p>Recommendation No change to Draft Plan.</p>

Observations, Submissions and Recommendations	Executive's Response & Recommendation
<p>The Draft LAP is generally consistent with Regional Policy Objectives (RPO) in the RSES for:</p> <ul style="list-style-type: none"> • Compact growth (RPO 3.2 and RPO 3.3), • MASP sustainable transport (RPO 5.2 and RPO 5.3, and, • MASP housing and regeneration (RPO 5.4 and RPO 5.5). 	
2.1.3 Consistency with Development Plan and Core Strategy.	
<p>i. Submission notes that the County Development Plan 2022-2028 settlement strategy (Fig. 2.9 Core Strategy map) identifies Kiltiernan – Glenamuck as a new residential community. The Core Strategy states that there is capacity to accommodate a potential yield of between 22,763 and 25,353 residential units across the county on 553 ha of lands identified for residential development and mixed-use with Kiltiernan – Glenamuck contributing to this with a potential figure of 2,015 residential units.</p> <p>The housing target of 2,524 units in the Draft LAP has had regard to the quantum of development in the area, the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) and the plan period of the draft Local Area Plan (2025-2031).</p> <p>The Draft Plan acknowledges that lands within the plan area are an important part of the county's residential land supply and sets out appropriate policies to support this.</p> <p>The OPR is satisfied that the Draft LAP is generally consistent with the County Development Plan including its Core Strategy.</p>	<p>The Executive notes and welcomes the commentary that the Draft Plan is generally consistent with the dlr County Development Plan, and the Core Strategy contained therein as this has been an important consideration in preparing the Draft Plan and in considering submissions in relation to land use zoning objectives for residential development.</p> <p>Recommendation No change to Draft Plan.</p>
2.1.4 Compact Growth, Zoning and Infrastructural Services	
<p>i. Submission notes that all of the lands within the plan area were zoned as part of the County Development Plan. As such, the OPR is satisfied that that land use zoning and Site</p>	<p>The Executive notes and welcomes the commentary that the lands within the Plan area were zoned as part of the County Plan and</p>

Observations, Submissions and Recommendations	Executive's Response & Recommendation
<p>Development Frameworks (SDF's) are consistent with the following RPO's in the RSES:</p> <ul style="list-style-type: none"> • RPO 3.2 (compact growth) • RPO 4.1 (settlement strategy) • RPO 5.2 and RPO 5.3 (MASP sustainable transport), and, • RPO 5.6 (MASP employment lands) <p>In accordance with RPO 5.1 (enabling infrastructure) of the RSES and section 4.5.2 of the Development Plans, Guidelines for Planning Authorities (2022) the OPR is satisfied that there are sufficient infrastructural services in the area to cater for the projected growth of the plan area.</p>	<p>that the Draft Plan is generally consistent with the mentioned RPO's in the RSES.</p> <p>The Executive also welcomes commentary that the OPR is satisfied that there are sufficient infrastructural services in the area to cater for the projected growth of the plan area. Infrastructural services and consistency with the RSES and the overarching County Development Plan have been an important consideration in preparing the Draft Plan and in considering submissions in relation to land use zoning objectives for residential development.</p> <p>Recommendation No change to Draft Plan.</p>
2.1.5 Town Centre Regeneration	
<p>i. The OPR welcomes policy KGLAP41 in the Draft LAP in relation to the Neighbourhood Centre zoning, identified as 'Kiltiernan Village Centre', as this will provide an appropriate multifunctional mix of uses and ensures a high quality, attractive civic environment and a sense of place and vitality which also optimises access to public transport corridors.</p>	<p>The Executive notes and welcomes the support for the policies and objectives included in the Draft LAP which relate to the provision of Kiltiernan Village Centre.</p> <p>Recommendation No change to Draft Plan.</p>
<p>ii. The OPR acknowledges and commends the considerable work regarding the preparation of SDFs in the draft Local Area Plan, including the policies and objectives for each site which support RPO 5.5 of the RSES in relation to housing and regeneration in Dublin City and suburbs.</p>	<p>The Executive notes and welcomes the support for the Site Development Frameworks (SDFs).</p> <p>Recommendation No change to Draft Plan.</p>
<p>iii. The OPR welcomes policies and objectives in relation to enhancements to the public realm in each of these areas consistent with RPO 8.1 (integration of transport and land use planning) of the RSES.</p>	<p>The Executive notes and welcomes the support for the policies and objectives included in the Draft LAP which relate to enhancement of the public realm.</p> <p>Recommendation No change to Draft Plan.</p>

Observations, Submissions and Recommendations	Executive's Response & Recommendation
2.1.6 Economic Development and Employment	
<p>i. The Draft LAP identifies 8 hectares of Economic and Employment zoning – SDF1 – Employment Lands, which is consistent with Objective CS7 – Strategic Employment Locations in the County Development Plan and with RPO 5.6 (MASP employment lands) of the RSES.</p> <p>The OPR welcomes policies and objectives for SDF1 which ensure the provision of a network of legible connected routes through the area and that a transition between large scale employment uses to the north and open space the south is encouraged and active travel links with adjoining sites are maximised.</p>	<p>The Executive notes and welcomes the support for the policies and objectives included in the Draft LAP which relate to SDF1 which is employment land.</p> <p>Recommendation No change to Draft Plan.</p>
2.1.7 Transport and Accessibility	
<p>i. The submission states that the Planning Authority's commitment to improving opportunities for walking, cycling and public transport is clearly evident from the extensive work undertaken in the preparation of the ABTA. This provides a clear base for policies and objectives, including active travel, for the Draft LAP.</p> <p>The OPR welcomes this approach which is in accordance with the National Transport Authority (NTA) guidance.</p>	<p>The Executive notes and welcomes the support for the ABTA process and the recognition by the OPR that the ABTA "provides a clear evidence base for policies and objectives, including active travel proposals, in the Draft Local Area Plan".</p> <p>Recommendation No change to Draft Plan.</p>
<p>ii. The OPR welcomes Objective PT3 – Kiltiernan Bus Terminus, working with the NTA on the delivery of an interim terminus at Enniskerry Road and the identification and delivery of a dedicated facility in the longer term.</p>	<p>The Executive notes the comments received.</p> <p>Recommendation See recommendation under NTA, Section 2.2.2.</p>
<p>iii. Submission states that policies and objectives to improve connectivity and permeability, enhance pedestrian and cycle movements, promote the 10-minute neighbourhood concept, improve modal shift and reduce vehicle movements, demonstrate consistency with:</p>	<p>The Executive notes and welcomes the support for the policies and objectives included in the Draft LAP which improve connectivity, enhance pedestrian and cycle movements, promote the 10-minute concept, improve modal shift and reduce vehicle movements.</p>

Observations, Submissions and Recommendations	Executive's Response & Recommendation
<ul style="list-style-type: none"> • Transport Strategy for the Greater Dublin Area 2022-2042, • the Greater Dublin Area Cycle Network Plan (2022), • the National Sustainable Mobility Policy (2022), and, • RPO 8.4 (integration of transport and land use planning) of the RSES. 	<p>Recommendation No change to Draft Plan.</p>
2.1.8 Flood Risk Management	
<p>i. Submission notes that the Draft LAP includes a Strategic Flood Risk Assessment (SFRA) which was prepared in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) and Circular PL 2/2014, RPO 7.12 (flooding) of the RSES and NPO 57 (water quality and resource management) of the National Planning Framework.</p> <p>The OPR acknowledges that policy KGLAP15 in the Draft LAP addresses flood risk considerations for proposed development and policy KGLAP10 ensures that Sustainable Urban Drainage Systems (SuDS) are applied to any development in the plan area.</p>	<p>The Executive notes the comments received.</p> <p>Recommendation No change to Draft Plan.</p>
2.1.9 Environment, Natural and Built Heritage	
<p>i. The OPR welcomes the integration of climate action policies and objectives from the County Development Plan into the Draft LAP and specifically supports the integration and implementation of the policies and provisions of the Dún Laoghaire-Rathdown County Council Climate Action Plan 2024-2029.</p>	<p>The Executive notes the comments received.</p> <p>Recommendation No change to Draft Plan.</p>
<p>ii. The OPR welcomes the policies and objectives in relation to Green Infrastructure, in particular the promotion of biodiversity, nature-based solutions to surface water management and the enhancement and extension of the parks and recreational facilities in the area.</p>	<p>The Executive notes the comments received including the support for the extension of the parks in the area and the extension to the Plan boundary to include Dixon's Lane and Dingle Glen.</p> <p>Recommendation No change to Draft Plan.</p>

Observations, Submissions and Recommendations	Executive's Response & Recommendation
The OPR acknowledges the extension of the Draft Local Area Plan boundary from that defined in the County Development Plan to include lands at Dixon's Lane and Dingle Glen proposed Natural Heritage Area.	
iii. The OPR welcomes policies and objectives in the Draft LAP for the protection and conservation of the built and cultural heritage of the plan area, in accordance with RPO 9.27 (heritage) of the RSES, and the inclusion of policies KGLAP53 and KGLAP54 to conserve archaeological heritage and protect recorded monuments from inappropriate development.	<p>The Executive notes the comments received.</p> <p>Recommendation No change to Draft Plan.</p>
2.1.10 Education, Social and Community	
<p>i. Submission notes that lands have been identified for future education use, and the detailed requirement for post-primary or primary school provision is yet to be determined and will be subject of continued liaison with the Department of Education.</p> <p>The OPR welcomes:</p> <ul style="list-style-type: none"> • The identification of Education zoned lands at a central location (SDF9), • Policy KGLAP19 and KGLAP20 to ensure future school provision within the plan area, and • Objectives SNI1 and SNI2 which provide for a purpose-built community facility within SDF6. <p>The submission notes that policies KGLAP17 and KGLAP18 support the provision of sustainable neighbourhood infrastructure consistent with the 10-minute neighbourhood concept.</p>	<p>The Executive notes the comments received.</p> <p>Recommendation No change to Draft Plan.</p>
2.1.11 Implementation and Monitoring	
i. The OPR welcomes the inclusion of Chapter 9 'Implementation and Monitoring' which sets out the implementation and/or phasing of relevant policies and objectives.	The Executive notes the issue raised and has reviewed the proposed provisions of the draft Plan concerning implementation and monitoring. As set out in both chapters 1 and 9 of the Draft

Observations, Submissions and Recommendations	Executive's Response & Recommendation
<p>Notwithstanding the level of detail provided, the OPR considers that further detail in relation to identifying timelines and ownership / leadership for the implementation of key policies and objectives would strengthen the primary focus of the Draft LAP to ensure that an adequate level of supporting services and amenities are provided in tandem with new developments.</p> <p>Observation 1 – Implementation and Monitoring</p> <p>"Having regard to section 6 of the Local Area Plans, Guidelines for Planning Authorities (2013), the Planning Authority is advised to review the proposed provisions of the draft Kiltiernan - Glenamuck Local Area Plan 2025 (draft Local Area Plan) concerning implementation and monitoring to provide more detail in relation to timelines and ownership / leadership to monitor the implementation of key policies and objectives of the Local Area Plan".</p>	<p>LAP this is the third Local Area Plan for Kiltiernan-Glenamuck and development is very much underway in the area.</p> <p>The Plan lands were originally zoned for housing development in 2004 and the experience of the two previous LAPs in the intervening years demonstrates the difficulty in identifying very clear timelines in relation to delivery of infrastructure, be it roads, parks or schools, as progression of same may involve external providers, their own consent process and/or land acquisition.</p> <p>In addition, the cyclical nature of the market economy at play in Ireland also has a bearing on progression and implementation of objectives that are developer led.</p> <p>It is considered that a number of amendments could be made in relation to delivery and timelines.</p> <p>Recommendation Amend Table 9.1 (pg. 86) as follows:</p> <p>Incorporate delivery and timeline for the following objectives.</p> <p>Chapter 2: Urban Design <u>"Delivery: Mainly Developer led with some elements led by Local Authority.</u></p> <p>Objective SNI1 Community Facility <u>Delivery: Mainly Developer led.</u> <u>Timeline – Short term</u></p> <p>Objective SNI3: Education Provision <u>Delivery: Department of Education</u></p> <p>Objective PT1 – Improved Bus Services</p>

Observations, Submissions and Recommendations	Executive's Response & Recommendation
	<p><u>Delivery: Dublin Bus and NTA</u> <u>Timeline – Short term</u></p> <p>Objective RT 1 - Transition Zones and Gateways <u>Delivery: Local Authority</u></p> <p>Transition Zones and Gateways <u>Delivery: Local Authority</u></p> <p>Objective RT2 - Local Junction Improvements: <u>Delivery: Local Authority</u></p> <p>Objective OS3 - Former Bective lands: <u>Delivery: Local Authority</u></p> <p>Objective OS2 - Kiltiernan Park: <u>Delivery: Local Authority"</u></p>

2.2 Overview of the Main Issues Raised and Recommendations Made by the National Transport Authority (NTA)

Observations, Submissions and Recommendations	Executive's Response & Recommendation
National Transport Authority – B095	
2.2.1 Background	
<p>i. The submission from the NTA:</p> <ul style="list-style-type: none"> • is broadly supportive of the suite of objectives set out in Chapter 5 of the Draft Local Area Plan. • notes that the NTA liaised closely with the Council and its consultants during the preparation of the Draft Local Transport Plan (LTP) and all stages of the Area Based Transport Assessment (ABTA) process. • Acknowledges the level of engagement afforded by the Council and are of the view that the Draft LTP provides a robust basis for the transport and movement related objectives in the Draft Local Area Plan. 	<p>The Executive notes the commentary and the support for the Draft LAP.</p> <p>Recommendation No change to Draft Plan.</p>
2.2.2 Transport and Movement Recommendations.	
<p>i. The NTA recommends that proposed Objective PT3b (of the Draft LTP) should be included in the final LTP and LAP as a Short-Term measure and should be prioritised for delivery following the adoption of the LAP, in order to ensure that the ambitious growth targets for the area can be met.</p>	<p>The Executive notes the issues raised.</p> <p>Objective PT3 contained in the Draft Local Transport Plan as follows:</p> <p>"Kiltiernan Bus Terminus Continue to liaise with the National Transport Authority with a view to:</p> <ul style="list-style-type: none"> • Deliver an interim bus terminus at Enniskerry Road close to the junction with Ballybetagh Road. • Identify and deliver a dedicated, longer-term bus terminus facility that will include bus parking, driver welfare facilities and electric vehicle charge points to support low emission buses".

Observations, Submissions and Recommendations	Executive's Response & Recommendation
	<p>'Measure PT3b' in Table 17-1 'Indicative Implementation Table' of the Draft LTP refers to a 'Dedicated Bus Terminus' being implemented in the medium (up to 2035) to the longer term (up to 2042).</p> <p>The NTA recommendation to update PT3b to include Short-Term (in addition to Medium/Long Term) is considered to be reasonable in order to facilitate a shorter-term provision of same.</p> <p>The Draft LAP does not contain a specific implementation timetable for the proposed transport measures, however, Section 5.6.5.1 Kiltiernan Bus Terminus in Chapter 5 of the Draft Lap states:</p> <p>"However, there is a need to provide a longer-term dedicated off-road facility incorporating bus parking bays, electric vehicle charging facilities and welfare facilities for drivers."</p> <p>Recommendation Amend text in Section 5.6.5.1 'Kiltiernan Bus Terminus', Chapter 5 (pg.62) of the Draft LAP as follows:</p> <p>"However, there is a need to provide a longer-term dedicated off-road facility incorporating bus parking bays, electric vehicle charging facilities and welfare facilities for drivers."</p> <p>Amend Objective PT3 in the Draft Local Transport Plan (pg.82) as follows:</p> <p>"Kiltiernan Bus Terminus Continue to liaise with the National Transport Authority with a view to:</p> <ul style="list-style-type: none"> • Deliver an interim bus terminus at Enniskerry Road close to the junction with Ballybetagh Road.

Observations, Submissions and Recommendations	Executive's Response & Recommendation
	<ul style="list-style-type: none">Identify and deliver a dedicated longer-term bus terminus facility that will include bus parking, driver welfare facilities and electric vehicle charge points to support low emission buses". <p>Amend Table 17-1 'Indicative Implementation Table' in the Draft LTP (pg.112) as follows:</p> <p>"Extend the timescale bar associated with 'Measure PT3b, Dedicated Bus Terminus' to also include the 'Short Term (up to 2028)'."</p>

Part 3: Summary of Issues Raised by Other Persons and Chief Executive's Responses and Recommendations

3.1 Chapter 1 – Executive Summary, Vision, Introduction, Context and Analysis

Issues	Sub. No.	Executive's Response & Recommendation
3.1.1 Vision		
i. LAP vision should include reference to: <ul style="list-style-type: none"> Delivering on the Sustainable Development Goals (SDGs), (not specified). Healthy Place Making. 'Healthy Ireland Framework', vision for "a healthy Ireland where everyone can enjoy physical and mental health and well-being to their full potential, where well-being is valued and supported at every level of society is everyone's responsibility". Metrics to measure a "healthy/healthier" Kiltiernan – Glenamuck. Kiltiernan – Glenamuck being a resilient neighbourhood. 	<u>B044</u>	<p>The Executive notes the issues raised.</p> <p>While the importance of the UN SDGs is acknowledged, and the reference to the Healthy Ireland Framework is of interest, including the referenced elements in the vision would render the vision very lengthy and complex with a resultant lack of clarity and brevity which are important in any vision.</p> <p>Recommendation No change to Draft Plan.</p>
3.1.2 General commentary on Plan		
i. Submission: <ul style="list-style-type: none"> considers that LAP ignores the potential to deliver much needed housing in the area. 	<u>B108</u>	<p>The Executive notes the issues raised.</p> <p>The vision as set out in the Draft Plan is focused on the delivery of quality residential development in the area along with the supporting infrastructure that is required for a thriving and sustainable neighbourhood including schools, parks and shops.</p> <p>The Plan sets out in section 1.8 that the potential population of the fully built out area could increase from 3,700 at present to 6,300, amounting to an additional 2,600 persons / 1,000 dwellings. The Section 28 Compact settlement Guidelines allow for additional residential development (circa an additional 500) in the area over and above that targeted in the core strategy of the dlr County Development Plan.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>It is noted that on the 8th April 2025, the Government approved the Revised National Planning Framework (NPF) which, subject to the approval of both Houses of the Oireachtas, signals the conclusion of the NPF revision process which has been underway since June 2023. In a press release issued with the publication the Minister stated that "Having regard to the need to ensure that current local authority development plans can be updated as quickly as possible to reflect the update housing requirements, I also intend, following completion of the NPF Revision process, to provide further clear direction and guidance relating to housing requirements and I fully expect local authorities to translate this revised NPF into their own local plans as speedily as possible."</p> <p>National Policy Objective 11 of the revised NPF is also noted. This states that "Planned growth at a settlement level shall be determined at Development Plan making stage and addressed within the objectives of the plan".</p> <p>It is anticipated that the Planning Authority will be re-examining the existing core strategy over coming months, and it is during any variation process that additional lands for housing will be brought forward in accordance with the sequential test for residential zoning in settlements as set out in the Section 28 Development Plan – Guidelines for Planning Authorities.</p> <p>Recommendation No change to Draft Plan.</p>
<p>ii. Submissions support and welcome the Draft LAP noting:</p> <ul style="list-style-type: none"> • The LAP role in protecting integrity of KG delivery of housing and infrastructure. • That protecting and promoting population health and fits the vision of the Healthy Ireland Framework "where everyone can 	<p><u>B039</u> <u>B044</u> <u>B052</u> <u>B075</u> <u>B120</u></p>	<p>The Executive notes and welcomes the support for the Kiltiernan-Glenamuck Local Area Plan.</p> <p>Recommendation No change to Draft Plan.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>enjoy physical and mental health wellbeing to their full potential, where wellbeing is valued and supported at every level of society and is everyone's responsibility."</p> <ul style="list-style-type: none">• The focus on planned and structured development in a consistent way in keeping with the characteristics of the Kiltiernan – Glenamuck area and that planning applications should reflect the LAP and only be granted if consistent with it.		

3.2 Chapter 2 – Urban Design Framework and Site Development Frameworks

Issues	Sub. No.	Executive's Response & Recommendation
3.2.1 Section 2.3.2 Central Parkland Character area		
i. Submission: <ul style="list-style-type: none"> considers that the the central parkland areas ignores the objective "A" land use zoning objective. requests alterations to layout of Central Parkland as shown in Figure 2.2 of the Draft Plan. The proposed changes would alter the shape of the parkland to correspond with requested relocation of Kiltiernan Park Phase 2. 	<u>B104</u> <u>B108</u>	<p>The Executive notes the issues raised.</p> <p>The character areas as indicated on figure 2.2 of the Draft LAP aim to identify 8 distinct areas within the Draft LAP boundary. The areas are defined by unique characteristics and/or the future vision for the lands as opposed to the underlying land use zoning objective.</p> <p>The Executive are not recommending that the location of Kiltiernan Park Phase 2 be relocated. It is therefore not recommended that figure 2.2 is amended.</p> <p>Recommendation No change to Draft Plan.</p>
3.2.2 Section 2.5 Urban Design Strategy for the Draft Plan Area		
i. Submissions: <ul style="list-style-type: none"> consider that the urban design strategy in the Draft LAP originates from the urban design strategy which was part of the Glenamuck District Roads Scheme (GDDR) application. consider that this is a flawed approach as the report was prepared for GDDR planning application, was not subject to public consultation and did not consider the Draft LAP boundary change. request changes to Figure 2.3 Indicative Urban Design Strategy map of the Draft Kiltiernan-Glenamuck Local Area Plan. The 	<u>B096</u> <u>B104</u> <u>B108</u>	<p>The Executive notes the issues raised.</p> <p>Section 2.4 of the Draft Plan sets out that the vision of the Draft Plan is to develop the Kiltiernan Glenamuck area in a sustainable manner, in a way that reflects its existing landscape, heritage and environmental assets.</p> <p>The Draft LAP sets out that the new road layout affords an opportunity for the area to be reframed in terms of urban design. The dlr commissioned Urban Design Report, which was prepared as part of a suite of documentation to support the Glenamuck District Roads Scheme (GDRS) consent application has informed the overall urban design approach and the Draft LAP sets out how the concepts contained in that report have been expanded upon.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>proposed changes would alter the indicative strategy layout to correspond with requested relocation of Kiltiernan Park Phase 2 and requested reduction in school site SDF9.</p>		<p>A variety of professionally prepared reports can inform the preparation of a Local Area Plan and in this instance the aforementioned Urban Design Report which related to a major piece of new road infrastructure that plays an important role in altering the future spatial landscape in the Kiltiernan area is considered to be a valuable input to the Draft Plan preparation.</p> <p>The Green Infrastructure concept as set out in section 2.5.1 of the Draft LAP details the concept of a central "heartland" midway along a strategic north south green corridor with lands on both sides of the Kiltiernan – Glenamuck Link Road connecting with the amenity of Wayside Celtic lands.</p> <p>As development is evidently underway in the area the draft plan very much builds on the previous LAPs and their overarching development strategies. It is of note that the 2013 Plan which predated the District Road Approval Scheme included for the provision of a north south and east west greenway linking future Jamestown Park to the neighbourhood centre. This would indicate that the Urban Design Report was informed by the earlier Local Area Plan.</p> <p>Recommendation No change to Draft Plan.</p>
<p>ii. Submission requests amendment to section 2.5.1 Green Infrastructure Concept to ensure it is clear as to which 110KV line is referenced. Requests amendment as follows:</p> <p>"Green Infrastructure Concept This concept is based on a landscape focused approach with the following key components: ...</p>	<p>B103</p>	<p>The Executive notes the issue raised and sees the benefit of providing clarity as to which 110KV line is referenced.</p> <p>Recommendation Amend section 2.5.1 (pg. 22) as follows:</p> <p>"Green Infrastructure Concept This concept is based on a landscape focused approach with the following key components: ...</p>

Issues	Sub. No.	Executive's Response & Recommendation
Utilising the southern 110 KV and 220KV powerlines as an open space spine while recognising the challenges they present"		Utilising the southern 110 KV and 220KV powerlines as an open space spine while recognising the challenges they present"
3.2.3 Section 2.6 General Urban Design Policies		
<p>i. Submission requests to amend text so as to provide for a degree of flexibility within the identified SDF lands, as follows:</p> <p>Policy KGLAP4 - Site Development Frameworks: It is policy that future development shall generally accord with the objectives set out in the site development framework section for each development site (see section 2.7). Planning applications shall include a consistency statement setting out how each of the objectives in the Site Development Framework will be delivered.</p> <p>Policy KGLAP4 - Site Development Frameworks: It is policy that future development shall generally accord with the objectives set out in the site development framework section for each development site (see section 2.7), which provide an indicative framework for specific land parcels. Planning applications shall include a consistency statement setting out how each of the objectives in the Site Development Framework will be delivered.</p>	<p><u>B078</u> <u>B103</u> <u>B108</u></p>	<p>The Executive notes the issue raised and would concur with the need for an element of flexibility while still requiring applicants to meet objectives set out under each Site Development Framework.</p> <p>It is considered that the addition of the word "generally" would be beneficial.</p> <p>Recommendation Amend Policy KGLAP4 (pg. 23 and Appendix 3) as follows:</p> <p>Policy KGLAP 4 - Site Development Frameworks:</p> <p>"It is policy that future development shall generally accord with the objectives set out in the site development framework section for each development site (see section 2.7). Planning applications shall include a consistency statement setting out how each of the objectives in the Site Development Framework will be delivered".</p>
<p>ii. Submission notes the importance of good urban design in achieving a balance between densification of built environment and providing well designed public realm, open spaces and neighbourhoods while preserving and safeguarding the areas important heritage to</p>	<p><u>B075</u></p>	<p>The Executive notes the issues raised.</p> <p>Recommendation No change to Draft Plan.</p>

Issues	Sub. No.	Executive's Response & Recommendation
achieve successful place making and create a strong identity.		
iii. Submission requests that: <ul style="list-style-type: none"> Wellbeing and property of existing residents be prioritised before permission granted on adjoining lands. LAP acknowledges and considers rights and entitlements of private estates before considering what is best for those already committed to the locality. 	<u>B092</u>	<p>The Executive notes the issues raised.</p> <p>Consideration is accorded to the impact of proposals on the residential amenity of existing developments during assessments of building proposals conducted through the development management process as guided by the County Development Plan policies.</p> <p>Recommendation No change to Draft Plan.</p>
iv. Submission welcomes the Draft LAP and requests the following: <ul style="list-style-type: none"> Built Form Objectives –that development should respond to form of existing development and reflect rural character of the area. 	<u>B120</u>	<p>The Executive notes the issues raised.</p> <p>Policies and objectives contained within the draft LAP and specifically those in chapter 2 which relate to overall urban design aim to ensure that development respond to the existing form of development and the rural character of the area.</p> <p>Recommendation No change to Draft Plan.</p>
3.2.4 Section 2.7 Site Development Frameworks (SDF)		
i. Submission requests that the text relating to the overall site development frameworks, as set out under section 2.7 Kiltiernan - Glenamuck Site Development Frameworks (SDF), be amended as follows (removal shown in strikethrough): <p>2.7 Kiltiernan - Glenamuck Site Development Frameworks (SDF) "Development of sites not specifically identified in this section will be assessed against the overall policy and objectives set out in this Draft</p>	<u>B108</u>	<p>The Executive notes the issue raised.</p> <p>Regard is had to the Section 28 "Local Area Plans – Guidelines for Planning Authorities" DECLG, 2013 which provides further guidance and context for local area plans and sets out that "Local Area Plans are intended to provide more detailed planning policies for areas that are expected to experience significant development and change".</p> <p>It is considered that it is not in accordance with the proper planning and sustainable development of the Kiltiernan-Glenamuck</p>

Issues	Sub. No.	Executive's Response & Recommendation
Plan in addition to the relevant policy objectives in the County Development Plan."		<p>area to remove a requirement for development to accord with the various policies and objectives set out in the Draft LAP.</p> <p>Recommendation No change to Draft Plan.</p>
3.2.5 Section 2.7.1 Employment Lands – Site Development Framework 1 (SDF1)		
<p>i. Submission requests updating SDF1 to allow for 2 accesses from Kiltiernan Road as outlined in 2013 LAP. Wording is suggested as follows:</p> <p>"In tandem with the adjoining land holder, access through the site form "The Park" Carrickmines to be provided, as identified in the CDP, in addition to 2 no. accesses from Kiltiernan Road"</p>	B103	<p>The Executive notes the issue raised.</p> <p>The objective set out in SDF1-1 is not intended to limit the number of access points to the Kiltiernan Road.</p> <p>Recommendation Amend Section 2.7.1, Movement Objectives SDF1-1 (pg. 24) as follows:</p> <p>"In tandem with the adjoining land holder, access through the site form 'The Park', Carrickmines to be provided, as identified in the CDP, in addition to access from Kiltiernan Road. <u>The number of accesses from the Kiltiernan Road to be agreed with the planning authority via the development management process.</u>"</p>
<p>ii. Submission:</p> <ul style="list-style-type: none"> requests that retention of any hedgerows or trees within the SDF1 lands should be subject to a full Arboriculture Assessment. Greater flexibility should be allowed given footprint requirements of end user. Considers that development of SDF1 may result in removal of some tress and hedgerows and that this should be reflected in SDF1 – 4. <p>Amendment suggested as follows: SDF1-4 "To retain the hedgerow (Where feasible) along the boundary of the "E" zoned lands with "The Park" to the north and</p>	B103	<p>The Executive notes the issue raised.</p> <p>As set out in section 12.8.11 of the County Development Plan decisions on preservation of trees in any planning application are made subject to full Arboriculture Assessment. Section 12.8.11 also sets out that, where it proves necessary to remove trees to facilitate development, the Council will require the commensurate planting or replacement trees and other plant material. It is not considered necessary to include this level of detail in SDF1-4.</p> <p>Recommendation No change to Draft Plan.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>along the boundary with the adjoining open space area to the northwest. To retain high quality trees or hedgerows within the lands where feasible, subject to arboricultural assessment, and where removed replacement planting or other landscaping appropriate to the character of the area will be provided"</p>		
<p>iii. Building height objectives should be less prescriptive for SDF 1 as a mixed-use employment scheme could not achieve height of 3 – 5 storeys.</p> <p>Amendments suggested as follows: "Heights to be a maximum of 5 storeys fronting onto Kiltiernan Road if the proposed employment/mixed use class of development facilitates same."</p> <p>Heights on the remainder of the site to range from 3 storeys to 5 storeys, if the proposed employment/mixed use class of development facilitates same, having regard to topography, surrounding existing developments, any adjacent residential development and the retention of views to the Dublin Mountains.</p> <p>Having regard to SPPR 3 in the Building Height Guidelines, there may be instances where an argument can be made for increased height and/or taller buildings. In circumstances where compliance with Policy Objective BHS1 and BHS2 of the County Development Plan (see appendix 5) can be demonstrated additional height may be appropriate, subject to complying with; the safeguards outlined in the CDP, and the</p>	<p><u>B103</u></p>	<p>The Executive notes the issue raised.</p> <p>It is unclear as to why a mixed-use development could not achieve a height of 3 – 5 storeys. In addition, the uses mentioned such as warehousing, logistics, commercial retail or industrial type uses would usually be relatively low rise. Similar text in relation to SPPR 3 is already included in County Development Plan policies on Building Height as set out in Appendix 5. It is not considered necessary to duplicate.</p> <p>Recommendation No change to Draft Plan.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>performance-based criteria as set out in table 5.1 of the BH strategy (see Appendix 5) or as set out in any subsequent County Development Plan.</p> <p>Ensure proposed heights achieve a balance between height and scale, contribute to variety in design and avoid against monolithic and monotonous buildings.</p> <p>Given the employment zoning of the subject lands, the Planning Authority acknowledge that flexibility may be required on the above requirements to facilitate different forms of employment generating use (such as warehousing, logistics, commercial retail or industrial type uses)"</p>		
<p>iv. Submission requests that SDF1 allow for retail warehousing and residential uses so as to support mixed use development on the E zoned lands as standalone offices are no longer viable. Request amendment as follows:</p> <p>Objective E2 - Employment Zoned lands: It is an objective that the employment-zoned lands (SDF1) to the north of the Draft Plan Lands should be linked physically and contextually to development on the balance of 'The Park' at Carrickmines. Further retail warehousing uses will be discouraged. Employment generating uses are encouraged as the desirable future development of these lands, however, other uses listed as permissible / open for consideration under the E zoning objective will be considered on their merits, particularly as part of a mixed-use development.</p>	<u>B103</u>	<p>The Executive notes the issue raised.</p> <p>Policy objective RET12 of the dlr County Development Plan 2022 – 2028 sets out that it is policy to control and limit retail warehousing in the County. While the office market is currently stagnant there are a variety of other employment generating uses which could be considered on the site.</p> <p>Recommendation No change to Draft Plan.</p>
<p>v. Submission questions the rationale for SDF1 – 2 which requires that development is 'to</p>	<u>B103</u>	<p>The Executive notes the issue raised.</p>

Issues	Sub. No.	Executive's Response & Recommendation
incorporate a transition between large scale employment uses to the north and open space to the south' noting that the transition is to an open space area and therefore it is not directly adjoining residential development. Wording suggested as follows; SDF1-2 "Development to incorporate a transition between large scale employment uses to the north and open space to the south should take cognisance of adjacent land use in terms of mitigating adverse impacts particularly on residential amenity".		<p>The rationale for SDF1-2 can be traced back to section 13.1.2 of the dlr County Development Plan "Transitional Zonal Areas" which states that "it is important to avoid abrupt transitions in scale and use in the boundary areas of adjoining land use zones." It is clear that transitional zoning applies between all land use zoning objectives and not just adjoining areas subject to a residential land use zoning objective.</p> <p>Recommendation No change to Draft Plan.</p>
3.2.6 Section 2.7.3 Glenamuck North Character Area Lands, north of Kiltiernan Road – Site Development Framework 3 (SDF3)		
i. Submission acknowledges and welcomes objective SDF3-1 in the Draft Plan and final Kiltiernan – Glenamuck Local Area Plan.	<u>B036</u>	<p>The Executive notes the issue raised.</p> <p>Recommendation No change to Draft Plan.</p>
ii. Submissions: <ul style="list-style-type: none"> Note that SDF3-1 states that "Vehicular access to the land parcel will be via one access from the Kiltiernan Road", however, it is intended to provide primary access to lands within SDF3 on its southern boundary via the GDDR. Assert that separate development accesses and service provision has been provided as part of the GDDR for land parcel SDF3-1(which has two separate owners). Consider that the requirement to develop the entire SDF3 via one vehicular access would make the development of one of the landholdings dependent on the completion and taking in charge of the other, thereby delaying the delivery of housing. 	<u>B036</u> <u>B048</u>	<p>The Executive notes the issue raised.</p> <p>KGLAP 1 – Urban Design in the Draft LAP states "It is (a) policy to promote a high standard of urban design throughout Kiltiernan - Glenamuck in accordance with the relevant policies set out in the County Development Plan, Section 28 Guidelines and other relevant guidance documents including: The Compact Settlement Guidelines (2024), and the Design Manual for Urban Roads and Streets (2019).</p> <p>Development shall be design-led, prioritising place making and accord with the Urban Design and Placemaking Vision for the area as set out in Section 2.4 and 2.5".</p> <p>The Draft Plan also states under section 5.6.6 that "The delivery of the Glenamuck District Roads Scheme (GDRS) will create an opportunity to provide high quality public realm in the new</p>

Issues	Sub. No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> Consider that access and service provision has been provided to Grange Oaks Phase 3 as part of the GDDR construction works in addition to a separate entrance for the remaining lands to the east. Request that Movement Objective SDF3-1 be reworded as follows, "Vehicular access to the land parcel will be via the Kiltiernan Road (GDDR)". 		<p>neighbourhood environment in Kiltiernan Village and create safer conditions for walking and cycling routes along with active street frontages and environments". As part of this, it is envisaged the GDRS will facilitate links between development sites onto the new roads where appropriate, thus providing a visual and physical engagement.</p> <p>In this regard it is recommended that a minor change is made to the Draft Plan under to SDF3-1- Remove "Vehicular access to the land parcel will be via one access from the Kiltiernan Road" and replaced with "Vehicular access to the land parcel will be via one access from the Kiltiernan Road unless otherwise agreed with the Local Authority". (All other bullet points to remain).</p> <p>Recommendation Amend Section 2.7.3, (pg. 25), Movement Objectives as follows:</p> <p>SDF3-1 "Vehicular access to the land parcel will be via one access from the Kiltiernan Road" <u>"Vehicular access to the land parcel will be via one access from the Kiltiernan Road unless otherwise agreed with the Local Authority". (All other bullet points to remain).</u></p>
<p>iii. Requests that reference to "Shaldon Grange" be changed to "Grange Oaks" in the final plan.</p>	<p>B048</p>	<p>The Executive notes the issue raised.</p> <p>Under compliance submission ABP31221421/C1 the Heritage Office reported that "The most appropriate name is considered to be Grange Oaks because of the connection with the original agricultural use of the lands "Grange", the existing house Shaldon Grange, the relevant field name; "Oak Field" and the retained oak trees on the site." The compliance was approved.</p> <p>Recommendation Amend (pgs. 20, 21, 26, 62, and Appendix 3) as follows: (pgs. 2, 3).</p>

Issues	Sub. No.	Executive's Response & Recommendation
		References to the new residential development at "Shaldon Grange" shall be changed to "Grange Oaks".
3.2.7 Section 2.7.4 Glenamuck North Character Area Lands, south of Kiltiernan Road – Site Development Framework 4 (SDF4)		
<p>i. Submissions:</p> <ul style="list-style-type: none"> State that movement objective SDF4 -1 is contrary to stated policy of dlr and proposed hierarchical strategy with primary access to SDF4 via the GDRS and secondary access via Glenamuck Manor and lands to the west and should be removed from the LAP. Suggests that Movement Objectives SDF4 – 1 be replaced with the following: "Vehicular access to the site will primarily be via the Glenamuck District Roads Scheme, with permeability links to schemes to the south and to the west." Indicates that the main access to Grange Oaks (Shaldon Grange) Phase 2 and land adjoining Glenamuck Manor is on the Enniskerry Road and considers that objectives for SDF4: <ul style="list-style-type: none"> Are inconsistent with the masterplan (including pedestrian linkages and road connections), agreed with Dun Laoghaire Rathdown County Council for land block 6b in Glenamuck North and submitted with three planning applications for Grange Oaks (Shaldon Grange), Dun Oir and Glenamuck Manor developments. Will separate access through the planned phases and restrict development north of the GDDR. 	<p><u>B037</u> <u>B048</u></p>	<p>The Executive notes the issue raised.</p> <p>KGLAP 1 – Urban Design in the Draft LAP states "It is (a) policy to promote a high standard of urban design throughout Kiltiernan - Glenamuck in accordance with the relevant policies set out in the County Development Plan, Section 28 Guidelines and other relevant guidance documents including: The Compact Settlement Guidelines (2024), and the Design Manual for Urban Roads and Streets (2019).</p> <p>Development shall be design-led, prioritising place making and accord with the Urban Design and Placemaking Vision for the area as set out in Section 2.4 and 2.5". The plan also states under section 5.6.6 that "The delivery of the Glenamuck District Roads Scheme (GDRS) will create an opportunity to provide high quality public realm in the new neighbourhood environment in Kiltiernan Village and create safer conditions for walking and cycling routes along with active street frontages and environments". As part of this, it is envisaged the GDRS will facilitate links between development sites onto the new roads where appropriate, thus providing a visual and physical engagement.</p> <p>In this regard it is recommended that a minor change is made to the Draft Plan under Section 2.7.4.</p> <p>Recommendation Amend Section 2.7.4, SDF4-1, (pg. 26), Movement Objectives as follows:</p>

Issues	Sub. No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> Will delay delivery of housing because of requirement for access via third party lands. Recommends following wording of Movement Objectives SDF4-1, "Vehicular access to the site will be via existing schemes". 		<p>"Vehicular access to the site will be via existing schemes which access from Glenamuck Road"</p> <p><u>"Vehicular access to the site will be via the Glenamuck District Roads Scheme and from lands to the south and west with permeability links to schemes to the south, west and east". (All other bullet points to remain).</u></p>
3.2.8 Section 2.7.6 Kiltiernan Village Centre and Village Centre Lands - Site Development Framework 6 (SDF6)		
i. Submission suggests that seating provision in strategic areas in the village are needed to enhance the town centre atmosphere.	<u>B045</u>	<p>The Executive notes the issues raised.</p> <p>The provision of seating at suitable locations is a matter that could be addressed through the development management process.</p> <p>Recommendation No change to Draft Plan.</p>
ii. Submissions request: <ul style="list-style-type: none"> Local Shopping Centre to include cinema, swimming pool and recreational facilities to be provided to serve growing population in the area. SNI/community centre in Kiltiernan Village for health and wellness facilities e.g. yoga, gym, beauty salon, barber/hairdresser and cafes. 	<u>B092</u> <u>B116</u>	<p>The Executive notes the issues raised.</p> <p>The Land Use Objectives set out in SDF6 - 4 provide objectives for a sustainable mix of uses in Kiltiernan Village including provision of a creche, supermarket and a community centre. The exact details of location, type and mix of uses will be addressed through the development management process.</p> <p>Recommendation No change to Draft Plan.</p>
3.2.9 Section 2.7.8 Lands to the East of Cairnbrook - Site Development Framework 8 (SDF8)		
i. Submissions recommend the following objectives for SDF8-1: <ul style="list-style-type: none"> Vehicular access to SDF8 should be from Glenamuck Road or from the access road to the north of Cairnbrook and access through Cairnbrook should be for pedestrians and cyclists only. 	<u>B066</u> <u>B082</u> <u>B094</u> <u>B120</u>	<p>The Executive notes the issue raised.</p> <p>Permission has been granted by dlr for a scheme with access via Cairnbrook. This issue was teased out via the Development Management process. It is noted that this application is currently under appeal. It is noted that Springfield Lane is a private roadway.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> Access to SDF8 should be via Springfield Lane on the basis that the previous LAP indicated that access via Cairnbrook (land parcel 30 in the 2013 LAP) would be curtailed by the capacity of the access roadway off the Glenamuck Road. It is also suggested that Cairnbrook is not a suitable access route as it already has road safety issues and increased traffic would lead to excessive and dangerous traffic through the estate. Springfield Lane should be main vehicular access into SDF8 on the basis that the development of SDF8 will not remove vehicular traffic from the Lane. 		<p>Recommendation No change to Draft Plan.</p>
<p>ii. Submissions:</p> <ul style="list-style-type: none"> Request policies and/or objectives and supporting text and maps should be aligned with the permitted development on site at 52 uph and 5 storeys in height. Considers that recent permission was granted in contravention of requirement of LAP to have regard to the rural character and transition to the objective 'B' zoning lands rising to the east and as a result will now be characterised by a 5-storey bland (in building form) apartment block. Permission should be granted in line with LAP. 	<p><u>B078</u> <u>B120</u></p>	<p>The Executive notes the issue raised.</p> <p>It is noted that the application referenced is currently under appeal.</p> <p>Recommendation No change to Draft Plan.</p>
<p>iii. Submission supports SDF8-2 and recommends a 15m setback from eastern boundary and maximum 2 storey height for any development to achieve a wildlife corridor and soft transition to B zoned lands.</p>	<p><u>B082</u></p>	<p>The Executive notes the issues raised.</p> <p>It is considered appropriate that detail of any setback from the eastern boundary and transition in height to address the B land use zoning objectives be teased out in the Development Management process.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		Recommendation No change to Draft Plan.
iv. Submission: <ul style="list-style-type: none"> Supports SDF8-3 but suggests that it lacks clarity as to the meaning of "responds" where it states, "Ensure development responds to the form of existing properties in Cairnbrook and adjoining rural character to the east". Notes that recent permission was granted for a 5-storey bland (in building form) apartment block in contravention of requirement of LAP to respond to the form of existing properties in Cairnbrook and adjoining rural character to the east. 	B082 B120	The Executive notes the issues raised. It is considered that the objective to "Ensure development responds to the form of existing properties in Cairnbrook and adjoining rural character to the east" is clear as to its intention and does not require further clarity. Recommendation No change to Draft Plan.
v. Submissions <ul style="list-style-type: none"> Suggest that the heights objectives set out in SDF8-4 are at odds with the heights in the concurrent application on SDF8 and recommends that the height be restricted to two storeys on the eastern boundary, with a general maximum height of three storeys, and with a four-storey set back level permitted at one location/exceptional circumstances. Note that permission was granted for 5 storeys on the eastern elevated part of the site in contravention of requirement of LAP for maximum 4 storeys and that permission should be granted in line with LAP. Consider that LAP proposes to restrict building height on the subject lands to a maximum of 4 storeys and density to 40 dph and this is 	B066 B078 B082 B120	The Executive notes the issues raised in various submissions relating to height on SDF 8. Opposing views are expressed with one submission wishing to restrict height to 2 storeys and the other submission considering that the height objective as set out in SDF8-4 of a maximum 4 storeys is too restrictive. Mention is made of the permitted development on site. It is noted that this application is currently under appeal and therefore it is not considered appropriate to comment on same. Having regard to adjoining development and the characteristics of the site including topography and adjoining land use objectives, it is considered the height parameters as set out in SDF8-4 are appropriate. It is further noted that the policy objectives of the dlr County Development Plan relating to height pertain and that these objectives allow arguments to be made for additional height.

Issues	Sub. No.	Executive's Response & Recommendation
<p>not consistent with the permitted LRD nor previous LAP.</p> <ul style="list-style-type: none"> Request amendments to text relating to building height policies and objectives, and Appendix 3 to provide for a building height of up to 5 storeys on the subject lands to better reflect the LRD permission which had regard to the topography of the site, separation distance, site size and the Building Heights Strategy of the CDP. Heights Objectives SDF 8-4 Maximum 4 5 storeys, however heights of buildings located in the eastern portion of the site to be restricted because of the elevated nature of the site. with heights of buildings located in the eastern portion of the site to have regard to the topography of the site in the context of the transition to the 'B' zoned lands to the east. 		<p>Recommendation No change to Draft Plan.</p>
<p>vi. Submissions:</p> <ul style="list-style-type: none"> Suggest that the density for SDF8-5 should be defined at a net level of 40 dph and this would be in line with the Sustainable and Compact Settlement Guidelines. Considers that lands within 1km of Ballyogan Luas Station also need to be considered under the 50 -250 dph category of the Guidelines given proximity to high frequency public transport. Amendment suggested as follows: Density Objectives SDF8-5 Generally, 40 45-55 dph. Submission notes that permission was granted on SDF8 in contravention of LAP objective for a maximum of 40 dph. 	<p><u>B0788</u> <u>B082</u> <u>B120</u></p>	<p>The Executive notes the issues raised in various submissions relating to density on SDF 8.</p> <p>Opposing views are expressed with one submission in support of the Draft Plan objective of the density being generally 40 units per hectare and another considering that the density parameter of 50 – 250 dph also need to be considered where lands are within 1km of Ballyogan Luas Stop. A suggested amendment is also put forward.</p> <p>As set out in the Draft LAP, having regard to the Section 28 'Sustainable Residential Development and Compact Settlements Guidelines', 2024, the entire Draft Kiltiernan-Glenamuck Local Area Plan is identified as a 'City – Suburban / Urban Extension' as defined in Table 3.1 'Areas and Density Ranges Dublin and Cork</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>City and Suburbs' of the Guidelines. The subject site is not within 1km of Ballyogan Luas Stop. It is considered that SDF8-5 which sets the density at "generally 40 dph" is appropriate having regard to both the guidelines and the site characteristics. The use of the word "generally" allows some flexibility.</p> <p>Recommendation No change to Draft Plan.</p>
<p>vii. Submissions</p> <ul style="list-style-type: none"> Request amendments to text relating to environment (hedgerows) objectives and Appendix 3 for SDF8 to provide for alteration of hedgerows along the eastern boundary of SDF8 where necessary to facilitate future development, including to provide access to the land to the east as supported/indicated on drawings in the LRD application. Environment Objectives SDF8-6: Retain hedgerow to the east as shown on Fig 7.1, chapter 7, where practicable and avoid private gardens bounding onto hedges to be retained. Alteration of hedgerows to provide for connectivity / access is permitted. Suggest that SDF8-6 be reworded to retain the hedgerow along the entire east and south boundary of the site. 	<p>B078 B082 B120</p>	<p>The Executive notes the issues raised in various submissions relating to hedgerows on SDF 8.</p> <p>As set out in section 12.8.11 of the County Development Plan new developments shall be designed to incorporate, as far as practicable, the amenities offered by existing trees and hedgerows. Figure 7.1 illustrates that a portion of the hedgerow along the eastern boundary of SDF8 is shown as being of moderate value in the dlr hedgerow survey ecological evaluation.</p> <p>Decisions on preservation in any planning application are made subject to full Arboriculture Assessment.</p> <p>There are various measures defined in the higher-order County Development Plan and in the Draft LAP which provide an appropriate level of protection for of important ecology and hedgerows, including GI1, GI7 and KGLAP44 in the LAP.</p> <p>Recommendation No change to Draft Plan.</p>
<p>viii. Submission considers that the area is used extensively by bats for foraging and nesting, and any additional extension of the built-up area into this dark zone will negative impact upon the foraging and nesting activity of bats. Suggests that the Council should have</p>	<p>B082</p>	<p>The Executive notes issues raised by this submission regarding bat presence in the area.</p> <p>The SEA consultants have advised that the potential impact of development on bat species has been fully considered and assessed at the appropriate scale in the SEA for the LAP. This is</p>

Issues	Sub. No.	Executive's Response & Recommendation
undertaken a bat survey of all new development areas in terms of bat activity, particularly those on the edge of the intended built up area of this part of Dun Laoghaire Rathdown.		<p>clearly acknowledged in Section 7 of the SEA Environmental Report where the following is stated:</p> <p>'Development may generate an increase in the quantum of light transmitted to sensitive ecological receptors, resulting in increased vulnerability and sensitivity of light-sensitive species (e.g., the Whiskered Bat, Daubenton's Bat).'</p> <p>Appropriate Plan-level mitigation has been developed and embedded/integrated into the LAP to ensure the protection of light-sensitive species, including bats (e.g., GI1, GI6, GI7, KGLAP45 etc.) Furthermore, a wide range of protective policies for the protection of important species is provided for in the higher-order CDP.</p> <p>Any planning application for a development proposal in this area would need to be supported by appropriate project-level ecological surveying, an Ecological Impact Assessment and ecological mitigation, as necessary.</p> <p>Recommendation No change to Draft Plan.</p>
3.2.10 Section 2.7.9 Education Lands – Site Development Framework 9 (SDF9)		
i. Submission would welcome engagement with the Department of Education to ensure that any all-weather pitches on SDF9 would be adjacent to and link to Wayside Celtic facilities if possible.	<u>B072</u>	<p>The Executive notes the issue raised.</p> <p>This is an issue best teased out between the Department of Education and Wayside Celtic. It is however overall policy as set out in the County Development Plan to encourage and support use of school facilities by the wider community.</p> <p>Recommendation No change to Draft Plan.</p>
ii. Submissions consider:	<u>B096</u> <u>B104</u>	The Executive notes the issues raised.

Issues	Sub. No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> • That the site development frameworks for SDF9 conflict with land use zoning map 9 of the dlr County Development Plan as it relates to designation of Objective 'B' (Agriculture) lands as education lands. • That, as no new residential zonings are proposed under the Draft LAP, there is no basis for the scale of school site proposed. • The school site will also sterilise fully serviced land with clear residential development potential for 150 units and indirect sterilisation of potential for a further 1000 units. • Requests that access and preservation of fully serviced objective B lands to east of SDF9 for future residential development. • Requests a reduction of the school site to 1.4 hectares as it is 3.75 times that required to provide 2 primary schools (Revised drawings are submitted) which it is argued will still deliver on objectives of Draft LAP. • Requests that consideration be given to urban typology schools on the site. • States that the design of school could include frontage to Kiltiernan Park and linkages to bus gate. 	<u>B108</u>	<p>SDF 9 is subject to land use zoning objective B - To protect and improve rural amenity and to provide for the development of agriculture. It is not considered that there is a conflict in terms of land use zoning as education as a use is open for consideration in this land use zoning objective.</p> <p>The submission from the Department of Education sets out that the Draft LAP outlined a proposed residential yield of 2,524 new homes which is higher than that envisaged in the dlr County Development Plan. This increase is based on permissions granted and capacity on residual lands taking into account new density parameters. It is an increase of 509 homes above that previously indicated.</p> <p>The Department has set out that there is a demand for two primary schools and potentially one post primary school. In a meeting to follow up on their submission on the Draft Plan they confirmed that, notwithstanding the use of urban typology design for any schools, the reservation of a 3.5ha site is appropriate given the future demand for schools is for two primary and potentially one post primary.</p> <p>Technical Guidance Document TGD-025 Identification and Suitability Assessment of Sites for Primary Schools 2 Edition, January 2012, Revision 1 September 2019 sets out the recommended Site Area in hectares for primary schools. For a 16 to 24 classroom primary school a site area of 1.5 hectares is recommended. There is a caveat that "Due to the scarcity of land in urban areas it is not always possible to achieve the ideal site size for school buildings. The guidelines set out that constraints in site sizes in urban areas mean that the full suite of external accommodation may not be provided in all cases. In such circumstances priority should be given to the provision of accommodation and services specific to the requirements of the</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>school." The guidelines also set out that some elements such as playing pitches and set down areas may be provided off site thus reducing site requirements.</p> <p>Technical Guidance Document TGD-027 Identification and Suitability Assessment of Sites for Post Primary Schools 1 Edition, January 2012, Revision 1 September 2019 sets out the recommended site area in hectares for 2 Storey post primary school buildings. For a 750 pupil post primary school a site size of 3.82 hectares is recommended. Similar caveats are set out the post primary guidelines to those set out in relation to primary schools.</p> <p>Site sizes can be reduced, and urban typology schools are an accepted form of school development, with nearby examples in Cherrywood providing on the ground evidence of how successful such typologies can be.</p> <p>Notwithstanding the consideration of smaller site sizes, with urban typology schools it is considered that the requirements of the Department of Education, in relation to schools required for the Kiltiernan - Glenamuck area, necessitate the reservation of the 3.5-hectare site for educational purposes.</p> <p>The development of the site for educational purposes can also allow for access to lands to the east of site and does not sterilise development of same although it is noted that the lands referenced in the submission are not currently zoned for residential development.</p> <p>The issue of access to the east of the draft Plan lands can be teased out between the Department of Education and the landowner at land acquisition and/or Development Management stage.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		Recommendation No change to Draft Plan.
3.2.11 Section 2.7.10 Glenamuck East – Site Development Framework 10 (SDF10)		
i. Submission requests flexibility on Building Heights that respond to site characteristics/constraints and opportunities, because density and height are important interrelated parameters, and taller buildings may be required to fulfil density requirements. Submission requests a merit-based approach and the following amendments: <ul style="list-style-type: none"> • Building Height Adjust Heights Objectives SDF10-4 to align with Policy KGLAP 30 – Building Heights providing for “increased height and/or taller buildings on lands located to the east of the Kiltiernan – Glenamuck Link Road” by inserting the text in red: • 2-4 storeys with potential for 5 storeys at appropriate locations along Kiltiernan Road. Additional height may be considered where performance criteria, as set out in section 5 of the Building Heights Strategy in the County Development Plan, can be demonstrated to the satisfaction of the Planning Authority. • Ensure proposed heights achieve a balance between height and scale, contribute to variety in design and avoid against monolithic and monotonous buildings. 	B089	The Executive notes the issues raised. The policy objectives of the dlr County Development Plan relating to height pertain and these objectives allow arguments to be made for additional height in line with SPPR 3 of the Building Height Guidelines. It is not considered necessary to duplicate this in SDF10- 4. Recommendation No change to Draft Plan.
ii. Submission requests that flexibility be applied in SDF10 at development management stage to	B089	The Executive notes the issues raised.

Issues	Sub. No.	Executive's Response & Recommendation
<p>determine where higher or lower densities are appropriate having regard to site constraints along the southern part of the site from Glenamuck Road South to the centre of the site.</p> <p>Submission requests adjusting Density Objectives SDF10-5 to support compact dense urban form by inserting the text in red: Density generally 50-80 dwellings per hectare. Higher densities may be considered at locations where it can be demonstrated that a 1km or less walking distance to a Luas stop can be achieved by the provision of a route through 'The Park', Carrickmines. Lower densities may be appropriate in some locations, having regard to local amenity and character.</p>		<p>It is considered that the 50 – 80 dph density parameters allow for the requested design-led density approach.</p> <p>Recommendation No change to Draft Plan.</p>
3.2.12 Section 2.7.11 Kiltiernan Park - New Phase (SDF11)		
<p>i. Submission requests that boundary of SDF11 be expanded to incorporate lands to the south of Jackson Park to help cater for the expansion of facilities at Wayside Celtic and:</p> <ul style="list-style-type: none"> • Provide a comprehensive framework for future development of the park. • Ensure that planning decisions consider the community's recreational needs. • Facilitate the integration of Wayside Celtic's facilities with broader recreational amenities. 	<u>B072</u>	<p>The Executive notes the issues raised.</p> <p>It is envisaged that Kiltiernan Park Phase 2 will cater for passive recreation as the former Bective lands are earmarked for active recreational use.</p> <p>Recommendation No change to Draft Plan.</p>
<p>ii. Submissions consider that:</p> <ul style="list-style-type: none"> • Current site development framework objectives are a down zoning of land. • The site development SDF11 conflicts with land use zoning map 9 of the dlr County Development Plan as it relates to the inclusion of Objective A zoned lands within 	<u>B096</u> <u>B104</u> <u>B108</u>	<p>The Executive notes the issues raised.</p> <p>In the Draft LAP SDF11 is identified as the location for an additional public park. The lands are subject to a mix of land use zoning objectives as follows:</p> <ul style="list-style-type: none"> • B – To protect and improve rural amenity and to provide for the development of agriculture.

Issues	Sub. No.	Executive's Response & Recommendation
<p>the proposed Kiltiernan Park- New Phase (SDF11).</p> <p>Submissions requests:</p> <ul style="list-style-type: none"> • Protection of the submitter, as the Draft Plan jeopardises their ability to develop their lands. • Removal of area identified as open space in SDF 11 which is subject to land use zoning objective "A". • Relocation of Kiltiernan Park Phase 2 to provide a 6.2-hectare passive park on high amenity zoned lands. Considers new location is more suitable in terms of topography and zoning. 		<ul style="list-style-type: none"> • A - To provide residential development and improve residential amenity while protecting the existing residential amenities and The predominant land use zoning objective on the site is objective "B". <p>No land use rezoning of the site is proposed in the Draft LAP.</p> <p>The proposed park location includes a small area subject to land use zoning objective "A" in the County Development Plan 2022 – 2028 where residential development could be permitted.</p> <p>Any residential Development on this small portion should address the proposed new park in layout and design and should also address the sensitive pocket of land to the south which is subject to the "G" land use zoning objective.</p> <p>The "Kiltiernan Glenamuck Draft Local Area Plan Parks Background Paper – Open Space" sets out that while existing and planned provision in the wider area beyond the plan lands is significant and while new developments are also delivering on public open space provision, in any new emerging community it is important to factor in adequate provision of areas for open space and recreation in a plan led manner.</p> <p>In preparing the Draft LAP, potential sites for open space provision were surveyed, examined and evaluated by planning and parks department staff. SDF 11 was identified as the optimum location for a parkland area because of its central location, accessibility, proximity to the school site, and existing and emerging residential developments, and the potential for linkages both north, south and east west. The location which is considered to be the logical and sequential extension of Kiltiernan Park would also be fully in accordance with the overall strategic vision and Urban Design Strategy of the Draft LAP.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>To fully consider submissions received to provide an alternative park location the area was visited by a multi-disciplinary team comprising LAP planners, parks staff and the biodiversity officer.</p> <p>The alternatively proposed park (phase 2 and phase 3) adjoins the protected Dingle Glen pNHA which is a dry valley formed by a glacial lake overflow channel. The importance of Dingle Glen lies in the variety of habitats within a relatively small area. Critically for the protection and regeneration of the formerly cleared vegetation at Dingle Glen and as noted by the NPWS in its 'Site Synopsis', it is "secluded and not subject to much disturbance".</p> <p>It was evident from the site inspection that the development of the proposed parks would result in significant construction and engineering interventions up to the edge of the secluded, undisturbed and steep sided Dingle Glen pNHA, and this would have permanent and irreversible adverse impacts on the diversity of habitats at this protected site.</p> <p>Phase 2 of the proposed park is located on the western side of Dingle Glen and Phase 3 is on the eastern side. Both are shown to be linked by a very narrow pathway running alongside the northern edge of the pNHA.</p> <p>It was observed on site that there is a significant steep drop into Dingle Glen that would constitute a safety risk for potential visitors. This risk could not be mitigated without unwarranted, serious and permanent physical interventions to the Dingle Glen pNHA and its immediate surroundings. It was further noted that because of topography and existing landscape features and wooded areas that the proposed parks would not be universally accessible without unwarranted interventions that would diminish the landscape character of the area.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>The SEA consultants have advised that the re-location of the proposed Kiltiernan Park to lands zoned as Objective G is more likely to result in significant adverse effects on Dingle Glen pNHA.</p> <p>The consultants advised that although the park will be passive in nature, the provision of a park, which is intended to serve a relatively densely populated area, in close proximity to Dingle Glen pNHA is more likely to result in adverse effects on the pNHA through human presence and activity resulting in habitat damage and impacts on sensitive flora species associated with the pNHA, including ground flora such as Foxglove (<i>Digitalis purpurea</i>), Wood Aven (<i>Geum urbanum</i>), Wood Melic (<i>Melica uniflora</i>) and Bugle (<i>Ajuga reptans</i>). This would result in conflicts with Biodiversity related SEOs defined under the SEA as well as the DLR Biodiversity Action Plan and national ambitions for biodiversity under the EU Nature Restoration Law.</p> <p>It is considered that the proposed park location is not suitable because it is unwarranted, inaccessible, physically isolated and at a remove from the developing areas within the KGLAP area. The park includes and would have serious adverse impacts on environmentally sensitive mature woodland areas, mature hedgerows and their associated habitats. The proposed park would result in significant, unnecessary human activity in the vicinity of and to the very edge of the protected Dingle Glen pNHA which cannot be justified or mitigated against.</p> <p>Parks and open spaces are provided to reflect the scale of development proposed and to meet the needs of future residents. The LAP has carefully considered the requirements of the existing and emerging community and the permitted Kiltiernan Park and proposed extension to it have been planned and permitted in a</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>central, accessible, functional and environmentally suitable location.</p> <p>The Parks Department has noted that the preferred location for the park adjacent to Jackson Park will have the added benefit of buffering and protecting the high-quality hedgerows around the site. The hedgerow along the Jackson Park side contains a number of high category class oak and beech trees. The boundary to the south contains a double line of important trees.</p> <p>The submissions rationale for the alternative proposed park location is couched in the context of their expectation of residential development on surrounding lands that are not currently zoned for residential development. This is in effect an artificially constructed need for the proposed park in a sensitive, upland high amenity area where it would adversely affect the integrity of the Dingle Glen pNHA. There is no imperative reason of overriding public interest or proper planning to justify the provision of the proposed park as an alternative to the suitable proposed extension of Kiltiernan Park identified in the LAP as it would have an adverse impact on the biodiversity, landscape character and integrity of the Dingle Glen pNHA.</p> <p>Recommendation Amend section 2.7.11 as follows:</p> <p>"A small portion of the site is subject to land use zoning objective "A" – "To provide residential development and improve residential amenity while protecting the existing residential amenities" <u>where residential development is permitted in principle.</u>"</p> <p><u>Environment objectives – SFD 11-2</u> <u>Add 2 new bullet points as follows:</u></p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p><u>"Ensure any development on the "A" zoned land is sensitive to the lands to the south which are subject to the "G" land use objective."</u></p> <p><u>"Ensure any development on the "A" zoned land is cognisant of the future Kiltiernan Park."</u></p> <p>Amend legend in figure 7.2 <u>"Future Park/SDF11"</u></p>
3.2.13 Section 2.7.12 Smaller Infill/Backland Site Development Objectives-(SDO)		
<p>i. Submission requests that section 2.7.12 Smaller Infill/Backland Site Development Objectives-(SDO) be amended as follows (additions in red):</p> <p>"2.7.12 Smaller Infill/Backland Site Development Objectives-(SDO) This section provides overall guidance for smaller infill/backland sites including any infill at Wayside Cottages and Glenamuck Cottages, and infill lands adjoining the GLDR." Heights Objectives SDO-3 2-3 storeys. Heights in any infill proposal shall be sensitive to the surrounding built form.</p>	<p><u>B104</u> <u>B108</u></p>	<p>The Executive notes the issues raised.</p> <p>As set out in section 2.7.12 of the Draft LAP. "This section provides overall guidance for smaller infill/backland sites including any infill at Wayside Cottages and Glenamuck Cottages.". As set out in section 12.3.7.6 of the dlr County Development Plan backland development usually involves the establishment of a new single dwelling, and a building line to the rear of an existing line of houses. Sites along the GLDR are not considered to be infill/backland sites.</p> <p>In relation to height, it is not considered that the requirement for 2 – 3 storeys should be added as infill/backland proposals may be required to be single storey in certain instances.</p> <p>Recommendation No change to Draft Plan.</p>

3.3 Chapter 3 – Climate Action and Infrastructure

Issues	Sub. No.	Executive's Response & Recommendation
3.3.1 Section 3.4 Sustainable Infrastructure		
i. Submission considers that the Climate Action and Infrastructure chapter should be informed by: <ul style="list-style-type: none"> National Adaptation Framework of 2024, "planning for a climate resilient Ireland". Climate Change Risk Assessment as well as a Strategic Flood Risk Assessment. Building community resilience. Building the adaptive capacity of the community. Reducing dependence on treated water. Landscaping with greatest capacity to sequester carbon. 	B044	<p>The Executive notes the issues raised.</p> <p>It is recommended that an amendment be made to reference the National Adaptation Framework 2024 and also the National Climate Action Plan 2025 which was published on 22nd April 2025.</p> <p>Recommendation Amend section 3.3 Policy Context, (pg. 35) as follows:</p> <p>"By implementing the Draft Plan, the Council will support relevant provisions contained in the National Climate Change Adaptation Framework (2018), <u>National Adaptation Framework, 2024 (NAF)</u>, the National Mitigation Plan 3 (2017), the National Climate Action Plan 20245 (and any subsequent Plan)."</p>
ii. Department of the Environment, Climate and Communications (DECC) recommends that the: <ul style="list-style-type: none"> LAP includes an objective and/or policy to support the implementation of CAP24 (and annual revision thereof, noting that CAP 2025 is likely to be in effect prior to the final LAP adoption process). LAP includes an objective and/or policy to support the implementation of the National Adaptation Framework, NAF, 2024 and update the reference to the previous National Climate Change Adaptation Framework 2018 with the new NAF. LAP includes further objectives and/or policies to ensure implementation of the dlr LACAP and related actions thereby ensuring 	B125	<p>The Executive notes the issues raised.</p> <p>It is recommended that an amendment be made to reference the National Adaptation Framework 2024 and also the National Climate Action Plan 2025 which was published on 22nd April 2025. It is considered that the dlr Climate Action plan is adequately referenced and supported in the Draft Plan in section 3.3 and is also supported in the higher-level County Development Plan.</p> <p>It is recommended that Appendix 2, Statutory Planning Context be updated to reflect the additional policy documents referenced by the Department.</p> <p>Policies on District Heat and the Circular Economy are already contained in the higher-level County Development Plan.</p> <p>Recommendation</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>consistency and alignment between the plans.</p> <ul style="list-style-type: none"> LAP includes reference to: <ul style="list-style-type: none"> Shaping Our Electricity Future, EirGrid's updated roadmap for the development of the transmission grid to 2030 to deliver on the 80% renewal energy targets. ESB's Network Strategy: 'Networks for Net Zero', which sets out ESB Networks' role in enabling the delivery of the Governments CAP 2023 and supports decarbonisation of the electricity system by 2040. LAP includes a policy to support the ambitions of the National Residential Retrofit Plan The Local Authority examines the potential of district heating and commit to carrying out a feasibility exercise and the use of heat mapping in support of same in LAP policies, LAP includes objectives and/or policies to support circular economy principles LAP includes further objectives and/or policies to support and facilitate the development of telecommunications infrastructure including the rollout of 5G. 		<p>Amend section 3.3 Policy Context, (pg. 35) as follows:</p> <p>"By implementing the Draft Plan, the Council will support relevant provisions contained in the <u>National Adaptation Framework, 2024 (NAF)</u>, National Climate Change Adaptation Framework (2018), the National Mitigation Plan 3 (2017), the National Climate Action Plan 2024 the National Mitigation Plan 3 (2017), the National Climate Action Plan 2024⁵ (and any subsequent Plan)."</p> <p>Amend Appendix 2, Statutory Planning Context (pg.1), as follows:</p> <p>Add:</p> <p><u>"Shaping our electricity future- A roadmap to achieve our renewable ambition (2021)</u> <u>ESB's Network Strategy: 'Networks for Net Zero (2023-2030)'"</u></p>
3.3.2 Section 3.4 Sustainable Infrastructure		
<p>i. To protect water quality, fisheries habitat/aquatic environment and, safeguard protected sites and, to prevent or minimise future flooding events submission recommends that:</p> <ul style="list-style-type: none"> Development is carefully controlled. 	<u>B031</u>	<p>The Executive notes the issue raised.</p> <p>dlr's Drainage section have advised that development is/will be carefully controlled. Key policies within the LAP include KGLAP9 Sustainable Water Management and KGLAP10 SuDS. Policy KGLAP11 ensures the implementation of the surface water legislation 'Environmental Objectives (Surface Waters) Regulations</p>

Issues	Sub. No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> LAP recognises importance of maintenance of all existing and future drainage infrastructure. Uisce Éireann confirms that foul wastewater from future development within the LAP can be conveyed to the wastewater treatment plant. Local Authority should audit drainage assets. Resource to maintenance and servicing of the drainage network and associated infrastructure. At design stage take account of the zone of influence associated with Greenway's/Blueway's to protect wildlife/riparian corridor systems from damage because of proximity and overengineering of pathways and cycleways. Consider the EU Nature Restoration Law and Regulation (Regulation (EU) 2024/1991) before adoption of Plan. 		<p>2009' to ensure that development permitted would not have an unacceptable impact on water quality including surface waters, ground water, river corridors, estuarine waters, bathing waters, coastal and transitional waters. Development within the LAP area shall comply with the Policies and Objectives of the County Development Plan relating to protection of existing water and drainage infrastructure.</p> <p>All surface water management designs should ensure they are in accordance with the requirements of the County Development Plan 2022-2028, Section 10.2.2.6 Policy Objective EI6: Sustainable Drainage Systems, such that the proposal must demonstrate the requirements of the Greater Dublin Strategic Drainage Study (GDSDS) policies in relation to Sustainable Drainage Systems (SuDS), Appendix 7: Sustainable Drainage System Measures.</p> <p>Dlr Surface Water Operations has a team to provide maintenance and servicing of the drainage network and associated infrastructure.</p> <p>There is a route to convey wastewater from the LAP lands to the wastewater treatment plant, as confirmed by UE.</p> <p>Dlr Surface Water Operations have a record of the drainage network for the county. In addition, an audit has commenced to ensure as far as possible, the accuracy of these records. Dlr Surface Water Operations has a team to provide maintenance and servicing of the drainage network and associated infrastructure.</p> <p>The SEA consultants have advised that the SEA for the Kiltiernan-Glenamuck LAP has accounted for the range of impacts from development proposals in the detailed assessment presented in Appendix 3 of the SEA ER. Impacted environmental receptors have been mitigated for with the use of embedded mitigation in the LAP</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>and the higher-order CDP, as well as amendments to Draft Plan policies and objectives to prevent conflicts with defined SEOs.</p> <p>With particular reference to the hydrological connectivity of the Plan Area and the receiving water environment, the LAP contains embedded mitigation for the protection of waterbodies (e.g. KGLAP 7, KGLAP 8, KGLAP 11, KGLAP 12 and KGLAP 13). Policies that are designed particularly for the maintenance of existing and future drainage infrastructure include KGLAP 9 and KGLAP 10.</p> <p>There is growing awareness of the need to ensure drainage systems are properly maintained to protect water quality. A minor amendment is recommended to Policy KGLAP10:</p> <p>DLR will promote the proper maintenance of SuDs in accordance with the Greater Dublin Strategic Drainage Study (GDSDS) and the CIRIA SUDS Manual to ensure the protection of water quality.</p> <p>In relation to Biodiversity the following SEO has been defined under the SEA for the LAP:</p> <ul style="list-style-type: none"> • B5 - Aim for no net contribution to biodiversity losses or deterioration in response to the biodiversity emergency. <p>It is suggested that this SEO be updated in the Environmental Report to as follows so as to align with the ambitions of the EU Nature Restoration Law:</p> <ul style="list-style-type: none"> • 'B5 - Aim for no net contribution to biodiversity losses or deterioration, and seek opportunities to achieve Biodiversity Net Gain, in response to the biodiversity emergency.' <p>Recommendation Amend section 3.5.2 KGLAP10 (pg. 36) as follows:</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>"Policy KGLAP10 – SuDS: It is Policy to ensure that Sustainable Drainage Systems (SuDS) are applied to any development in the KGLAP area and that site specific solutions to surface water drainage systems are developed which meet the requirements of the Water Framework Directive and associated River Basin Management Plan. SuDS measures may include green roofs, permeable paving, detention basins, infiltration systems etc.</p> <p><u>DLR will promote the proper maintenance of SuDs in accordance with the Greater Dublin Strategic Drainage Study (GDSDS) and the CIRIA SuDs Manual to ensure the protection of water quality."</u></p>
ii. Submission from Uisce Éireann states that the GDA water supply is Amber / constrained and notes that water supply capacity regularly changes. In this regard the LAP should strive for water efficient and water neutral housing through planning conditions for new developments such as the integration of rainwater harvesting with SuDS.	<u>B085</u>	<p>The Executive note with concern the amber status of the GDA water supply.</p> <p>In line with dlr SuDS policies, rainwater harvesting is an option promoted within the suite of acceptable SuDS measures.</p> <p>Recommendation No change to Draft Plan.</p>
iii. Submission from Uisce Éireann (UE) states that: <ul style="list-style-type: none"> wastewater treatment at the Bray/Shanganagh Plant has capacity for Kiltiernan – Glenamuck. Constraints in the sewer network are being progressed. Individual sites will need to connect to this new truck sewer. Localised network upgrades may be needed to service some sites. Development should be phased to maximise use of existing infrastructure and capacity. UE assets are to be protected – third party agreements are required for connections. 	<u>B085</u>	<p>The Executive notes the issues raised and welcome that there is water capacity for the growth in the Plan area.</p> <p>Recommendation No change to Draft Plan.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> UE should be consulted at an early stage for planned works. 		
3.3.3 Section 3.5 Sustainable Water Management		
i. The sustainable urban drainage system (SuDS) serving Kiltarnan Wood is used for illegal dumping and needs to be cleared.	<u>B050</u> <u>B053</u>	<p>The Executive notes the issues raised.</p> <p><i>This is an operational issue that falls outside of the remit of the LAP.</i></p> <p>Recommendation No change to Draft Plan.</p>
ii. Submission from Uisce Éireann (UE) welcomes SuDS objectives and recommends that the LAP: <ul style="list-style-type: none"> Encourages SuDS and green and blue infrastructure in new developments including public realm and retrofit existing developed areas. Removes surface water from combined sewers to increase capacity of foul drainage system for new development. Introduces Nature based SuDS in areas contributing to combined drainage systems where streetscape enhancement or resurfacing programmes are planned. <p>UÉ will engage with the Council in relation to nature-based rainwater initiatives.</p>	<u>B085</u>	<p>The Executive notes the issues raised.</p> <p>SuDS and green/blue infrastructure are/will be encouraged. Key policies within the LAP include KGLAP9 Sustainable Water Management and KGLAP10 SuDS.</p> <p>Development within the LAP area shall comply with the Policies and Objectives of the County Development Plan relating to protection of existing water and drainage infrastructure. All surface water management designs should ensure they are in accordance with the requirements of the County Development Plan 2022-2028, Section 10.2.2.6 Policy Objective EI6: Sustainable Drainage Systems, such that the proposal must demonstrate the requirements of the Greater Dublin Strategic Drainage Study (GDSDS) policies in relation to Sustainable Drainage Systems (SuDS), Appendix 7: Sustainable Drainage System Measures.</p> <p>There are no combined sewers in the area from a review of the UÉ GIS network. All surface water within the LAP area is discharged directly to a stream from the separate storm water sewer network. Dlr welcome engagement on nature-based rainwater initiatives.</p> <p>Recommendation No change to Draft Plan.</p>

Issues	Sub. No.	Executive's Response & Recommendation
iii. Submission from the OPW welcomes: <ul style="list-style-type: none"> • Policy KGLAP9 - Sustainable Water Management. • Policy KGLAP10 – SuDS. 	B086	The Executive notes and welcomes the commentary. Recommendation No change to Draft Plan.
iv. Submission considers that greater attention should be paid to waterways and rivers which have been badly affected by ongoing road works and Inland Fisheries should be testing the waters for pollution.	B084	The Executive notes the submission made. Development is/will be carefully controlled. Key policies within the LAP include KGLAP9 Sustainable Water Management and KGLAP10 SuDS. Policy KGLAP11 ensures the implementation of the surface water legislation 'Environmental Objectives (Surface Waters) Regulations 2009' to ensure that development permitted would not have an unacceptable impact on water quality including surface waters, ground water, river corridors, estuarine waters, bathing waters, coastal and transitional waters. Development within the LAP area shall comply with the Policies and Objectives of the County Development Plan relating to protection of existing water and drainage infrastructure. All surface water management designs should ensure they are in accordance with the requirements of the County Development Plan 2022-2028, Section 10.2.2.6 Policy Objective EI6: Sustainable Drainage Systems, such that the proposal must demonstrate the requirements of the Greater Dublin Strategic Drainage Study (GDSDS) policies in relation to Sustainable Drainage Systems (SuDS), Appendix 7: Sustainable Drainage System Measures. Dlr Surface Water Operations has a team to provide maintenance and servicing of the drainage network and associated infrastructure. There is a route to convey wastewater from the LAP lands to the wastewater treatment plant, as confirmed by UÉ.

Issues	Sub. No.	Executive's Response & Recommendation
		<p>Dlr Surface Water Operations have a record of the drainage network for the county. In addition, an audit has commenced to ensure as far as possible, the accuracy of these records. Dlr Surface Water Operations has a team to provide maintenance and servicing of the drainage network and associated infrastructure.</p> <p>Recommendation No change to Draft Plan.</p>
3.3.4 Section 3.6 Flood Risk Management		
<p>i. Submission from the OPW welcomes:</p> <ul style="list-style-type: none"> • Policy KGLAP14 – Flood Risk Assessment. • Policy KGLAP15 Flood Risk Considerations. 	B086	<p>The Executive notes and welcomes the commentary.</p> <p>Recommendation No change to Draft Plan.</p>
3.3.5 Section 3.9 Electricity		
<p>i. Submission from Eirgrid states that:</p> <ul style="list-style-type: none"> • increasing future demand on domestic electricity will continue to make KGLAP a strong node of electricity. • future demand indicates that the ongoing presence of pylons will continue into the future, making their presence a 'long-established context for any consideration of development in this area.' • Development with an urban built form will continue to absorb existing overhead electricity infrastructure from a visual and social perspective. • States that there is no imposition of any mandatory setback from this infrastructure as grid infrastructure is inherently designed and operated to be safe to human health. • Notes previous discussions between Eirgrid and the Council regarding the 	B063	<p>The Executive notes and welcome the submission from Eirgrid.</p> <p>It is acknowledged that future demand on domestic electricity will continue to make KGLAP a strong node of electricity. While it is noted that the submission states that there is no imposition of any mandatory setback from power lines the "ESB Networks Code of Practice for Avoiding Danger from Overhead Electricity Lines" (2019) sets out exclusion zones for higher voltage overhead lines.</p> <p>The commitment to further engagement is welcomed.</p> <p>Recommendation No change to Draft Plan.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>undergrounding of power lines, however, this may not be feasible.</p> <ul style="list-style-type: none"> • Welcomes future engagement with the Council with regard to undergrounding and other issues. 		
<p>ii. Submission requests a new objective as follows:</p> <p>Policy KGLAPXX – Overhead Power Lines It is Policy to: Encourage the undergrounding of the 110kv transmission lines where feasible.</p>	<u>B103</u>	<p>The Executive notes the issue raised.</p> <p>The Draft Plan states in section 3.9 Electricity "To encourage the undergrounding of the lines continues to be an objective of this Draft Plan".</p> <p>Recommendation No change to Draft Plan.</p>
<p>iii. Submission considers that overhead electricity wires and masts should be phased out from residential areas and located underground for human safety and existing services should be relocated underground before the provision of new housing.</p>	<u>B092</u>	<p>The Executive notes the issue raised. This is an operational matter for ESB.</p> <p>Recommendation No change to Draft Plan.</p>

3.4 Chapter 4 – People and Homes

Issues	Sub. No.	Executive's Response & Recommendation
3.4.1 Section 4.2 People		
i. Submission requests that Section 4 – People and Homes should reference that Kilternan Cemetery Park is located within the LAP area and provides an important social and community function for the area. Plans to provide a Place of Worship building within the grounds of the Kilternan Cemetery Park to enhance the range of burial services should also be referenced.	B090	<p>The Executive notes the issue raised.</p> <p>Section 4.2.3 'Existing SNI' lists existing Sustainable Neighbourhood Infrastructure facilities and existing recreational facilities that are located within and adjoining the Draft LAP boundary.</p> <p>The definition of SNI, as set out in the Glossary of the County Development Plan 2022-2028, states:</p> <p>"Sustainable neighbourhood infrastructure includes land or buildings that serve the needs of the local and wider community for social, educational, health, religious, recreational and leisure, community, cultural, and civic needs. These facilities and uses may be provided by public sector bodies, the community themselves or by the private sector. Facilities and services include, but are not limited to – schools, third level education, places of worship, hospitals, health centres/GPs, community centres, youth centres, leisure centres, family resource centres, libraries, church/parish halls, meeting rooms, scout dens, men's sheds, theatres and civic offices."</p> <p>A relatively small portion of the overall Kilternan Cemetery Park is located within the boundary of the Draft LAP. The western most portion of the Cemetery that is located within the boundary consists of an extension to the cemetery permitted under Reg. Ref D21A/0502 / APB-313719-22, which is currently under construction.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>While it is acknowledged that the existing cemetery is accessible to the public, there is currently no place of worship within the Kilternan Cemetery Park.</p> <p>A cemetery in and of itself does not fall within the meaning 'Sustainable Neighbourhood Infrastructure', nor it is a 'recreation facility', therefore the Cemetery Park, in its current format, was not considered as an existing SNI or a recreational facility in the SNI audit that informed the Draft LAP.</p> <p>Recommendation No change to Draft Plan.</p>
3.4.2 Section 4.2.3.2 Future Community Needs		
i. Submission requests that an objective is placed on lands to the northwest of the plan boundary for a community / recreational facility.	B075	<p>The Executive notes the request for a community related objective.</p> <p>The lands in question are not located within the Draft Plan boundary and as such it would not be appropriate to apply an objective to lands that fall outside of the Draft Plan area.</p> <p>See also Sections 3.1 (boundary) and 3.8 (recreation facility)</p> <p>Recommendation No change to Draft Plan.</p>
3.4.3 Section 4.2.3.4 Future School Provision		
i. Submissions: <ul style="list-style-type: none"> • Welcome the proposed area for new schools • Requests the inclusion of a site for a secondary school within the plan area. • Note that there is a need for safe active travel links to schools. • Consider that Policies and Objectives are needed to facilitate new school and expansion of existing schools. 	B038 B041 B059 B082 B092 B102	<p>The Executive notes and welcomes the support for the Education Lands – Site Development Framework 9 (SDF9).</p> <p>The Planning Authority liaised with the Department of Education (DoE), who are responsible for the delivery and/or improvement of schools, when preparing the Draft LAP in relation to school provision within the Draft Plan area.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> State that schools in the area are at capacity and creches cannot be staffed. No development should take place until confirmation that places are available or new schools built. 		<p>The lands reserved for education use per SDF9 in the Draft LAP, align with a 'Proposed Education Site' objective, identified by an 'ED' symbol on Map 9 of the County Development Plan 2022-2028.</p> <p>Chapter 4 of the Draft LAP includes the following policy and objective in relation to future school provision:</p> <ul style="list-style-type: none"> Policy KGLAP 20 – 'Future School Provision', "To continue to liaise with the Department of Education to assess the needs for educational facilities, in particular the possible need to provide a secondary school for the broader area given the extent of development in the wider area, including Stepside/Ballyogan." Objective SNI3 – 'Education Facilities': "It is an objective: <ul style="list-style-type: none"> To retain and/or improve existing education provision within the Draft KGLAP. To reserve lands for future education use within the Central Parkland Character Area as identified in figure 4.2. To promote the use of urban typologies in the design of any education facilities. Encourage linkages from any education facility into adjoining green space to maximize permeability to and across education lands." <p>While the DoE indicated that 2no. primary schools would be required to serve the Draft Plan area, in their submission under B081, the DoE have indicated that there may also be a need for a post primary school. Policy KGLAP 20 refers to the possible need for a secondary school. Furthermore, Objective SNI2 does not restrict the use of the lands reserved for education use to only primary or secondary level schools.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>In addition to the lands explicitly reserved for future education, there may be opportunity to facilitate an additional school, as may be required by the DoE, within other undeveloped lands either within the Draft Plan area or in close proximity to the plan boundary as schools are either permitted in principle in most land use zoning objectives, including within lands zoned:</p> <ul style="list-style-type: none"> • 'Objective A' – "To provide residential development and improve residential amenity while protecting the existing residential amenities." • 'Objective B' – "To protect and improve rural amenity and to provide for the development of agriculture". • 'Objective E' – "To provide for economic development and employment". • 'Objective SNI' – "To protect, improve and encourage the provision of sustainable neighbourhood infrastructure". <p>Objective SNI3 supports the improvements to existing schools along with improved permeability to schools. There are also a suite of recommended permeability routes set out in Chapter 5 of the Draft LAP that would, once delivered, provide safe walking and cycling routes throughout the Draft Plan area.</p> <p>Staffing of facilities is not a Local Area Plan matter.</p> <p>The Council will continue to engage with the Department of Education in relation to the provision of adequate schools and any required extensions / improvements to existing schools.</p> <p>Recommendation See recommendation set out in 3.4.2 ii.</p>
ii. Submission from the Department of Education welcomes the continued engagement between	<u>B081</u>	The Executive notes and welcomes the support from the Department of Education.

Issues	Sub. No.	Executive's Response & Recommendation
<p>the Department and the Council with regard to school provision across the County. The Department welcomes:</p> <ul style="list-style-type: none"> • Policy KGLAP19 'School Facilities', • Policy KGLAP20 'Future School Provision' • Objective SNI3 'Education Facilities', and, • The reservation of a 3.5-hectare site for Education identified as SDF9. <p>The Department notes that text within Section 4.2.3.4 of the Draft Plan refers to there being a need for 2no. primary schools and refers to communication with the Council with regard to school provision identifying a potential need for 2no. primary schools and post primary school. Having regard to the potential population growth for the Plan area, in addition to growth projections for the adjoining Ballyogan and Environs LAP, the Department have noted that there may be a requirement for an additional post primary school either within the KGLAP and/or BELAP area. In this regard, any site reserved for education use should be of sufficient size, suitably located and appropriately zoned within either the KGLAP or BELAP plan areas in order to cater for the population growth of both plan areas. The Department notes that future school requirements are conditional on the projected population materialising.</p> <p>The submission from the Department also refers to potential additional school accommodation needs for Special Education and for additional</p>		<p>As noted in the submission, the Planning Authority liaised with the Department of Education (DoE) when preparing the Draft LAP in relation to school provision within the Draft Plan area.</p> <p>The lands reserved for education use per SDF9 in the Draft LAP, align with a 'Proposed Education Site' objective, identified by an 'ED' symbol on Map 9 of the County Development Plan 2022-2028. The lands reserved for future education use are centrally located within the Draft plan area proximate to established and emerging residential developments. The lands are located on an existing public road, Glenamuck Road, and would also benefit from access onto the new Kiltiernan-Glenamuck Link Road.</p> <p>There are also a series of recommended key permeability routes and active travel routes set out in Chapter 5 of the Draft LAP that connect the education lands to adjoining recreation amenities, a proposed future park and on to the Village Centre area where a new community facility has been permitted.</p> <p>The provision of specific infrastructure for a site would be dealt with through the development management process.</p> <p>The lands reserved for future education have an underlying land use zoning 'Objective B' – "To protect and improve rural amenity and to provide for the development of agriculture". As set out in Table 13.1.4 in Chapter 13 of the County Development Plan 2022-2028, 'Education' use is 'Open for Consideration'.</p> <p>Land use zoning is set out at County Development Plan level. A Local Area Plan must be consistent with the provisions of the County Development Plan; therefore, land use zoning cannot be changed within a Local Area Plan.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>school places arising from unforeseen circumstances such as the Ukrainian crisis.</p> <p>The Department of Education has requested that the following issues are considered in the Draft KGLAP:</p> <ul style="list-style-type: none"> Amend text in Section 4.2.3.4 to read as follows: "The Department of Education has advised that subject to the projected population growth materialising, 2 no. 24 classroom primary schools are required to serve the Draft Plan area." That the Education lands identified in SDF9 is rezoned from 'Objective B' – 'To protect and improve rural amenity and to provide for the development of agriculture' to 'Objective SNI – To protect, improve and encourage the provision of sustainable neighbourhood infrastructure'. As schools are considered to be enabling infrastructure for housing, that the proposed education site is served by all enabling infrastructure such as roads, water, electricity, active travel etc. and that its location fits the following criterion: <ul style="list-style-type: none"> Is positioned in the heart of new and expanding communities, Complementary uses and facilities such as community facilities and amenities are located close to schools. That the Plan provides explicit support for the provision of accommodation for special education. 		<p>Text in Section 4.2.3.4 'Future School Provision' in Chapter 4 of the Draft LAP states: "Given the policy to provide primary and post primary schools within the BELAP area and the proximity of the Draft Plan area to BELAP, it is considered that an additional post-primary school within the Draft Plan area may not be required. A site of approximately 3.5 hectares has been reserved for the provision of educational facilities and is identified as 'Education Lands' in Site Development Framework 9 in Chapter 2. This site could potentially accommodate 2 new primary schools.</p> <p>The Department of Education has advised that 2no. 24 classroom primary schools are required to serve the Draft Plan area".</p> <p>Policy KGLAP 20 and Objective SNI3 in relation to future school provision in Chapter 4 go on to state:</p> <ul style="list-style-type: none"> Policy KGLAP 20 – 'Future School Provision', "To continue to liaise with the Department of Education to assess the needs for educational facilities, in particular the possible need to provide a secondary school for the broader area given the extent of development in the wider area, including Stepside/Ballyogan." Objective SNI3 – 'Education Facilities': "It is an objective: <ul style="list-style-type: none"> To retain and/or improve existing education provision within the Draft KGLAP. To reserve lands for future education use within the Central Parkland Character Area as identified in figure 4.2. To promote the use of urban typologies in the design of any education facilities.

Issues	Sub. No.	Executive's Response & Recommendation
		<ul style="list-style-type: none"> Encourage linkages from any education facility into adjoining green space to maximize permeability to and across education lands." <p>While the DoE initially indicated that 2no. primary schools would be required to serve the Draft Plan area, they have now indicated that there may also be a need for a post primary school within the plan area in addition to 2no. primary schools in the event that the population projected for the plan area materialises.</p> <p>Policy KGLAP 20 refers to a possible need for a secondary school. Objective SNI2 does not restrict the use of the lands reserved for education use to only primary or secondary level schools.</p> <p>In addition to the lands explicitly reserved for future education, there may be opportunity to facilitate an additional school, as may be required by the DoE, within other undeveloped lands either within the Draft Plan area or in close proximity to the plan boundary as schools are either permitted in principle in most land use zoning objectives, including within lands zoned:</p> <ul style="list-style-type: none"> 'Objective A' – "To provide residential development and improve residential amenity while protecting the existing residential amenities." 'Objective B' – "To protect and improve rural amenity and to provide for the development of agriculture". 'Objective E' – "To provide for economic development and employment". 'Objective SNI' – "To protect, improve and encourage the provision of sustainable neighbourhood infrastructure". <p>While it is noted that the DoE have not explicitly requested that the Draft Plan be amended to explicitly state that a secondary</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>school is required, the text of Section 4.2.3.4 could be amended to provide more flexibility in this regard.</p> <p>Objective SNI3 supports the improvements to existing schools which would include to the provision of special education accommodation as required.</p> <p>The Council will continue to engage with the Department of Education in relation to the provision of adequate schools and any required extensions / improvements to existing schools within the Draft Plan area as need arises.</p> <p>Recommendation Amend text in Section 4.2.3.4 'Future School Provision' in Chapter 4 (pg.46) of the Draft LAP as follows:</p> <p>"...Given the policy to provide primary and post primary schools within the BELAP area and the proximity of the Draft Plan area to BELAP, it is considered that an additional post-primary school within the Draft Plan area may not be required, <u>however, the Council will continue to engage with the Department of Education in this regard.</u> A site of approximately 3.5 hectares has been reserved for the provision of educational facilities and is identified as 'Education Lands' in Site Development Framework 9 in Chapter 2. This site could potentially accommodate 2 new primary schools.</p> <p>The Department of Education has advised that, <u>subject to the projected population growth materialising,</u> 2no. 24 classroom primary schools are required to serve the Draft Plan area".</p> <p>Amend Policy KGLAP 20 – 'Future School Provision', (pg.46) as follows:</p>

Issues	Sub. No.	Executive's Response & Recommendation
		"To continue to liaise with the Department of Education to assess the needs for educational facilities, in particular the possible need to provide a secondary school for the broader area given the extent of development in both within the Plan area and in the wider area, including Stepside/Ballyogan."
3.4.4 Section 4.2.3.6 Healthcare		
i. Submissions consider that the People and Homes chapter should: <ul style="list-style-type: none"> • Broaden the meaning of health beyond healthcare services. • A healthy place should be within the "WHO definition of Health", which is physical and mental wellbeing and not merely absence of disease. • Address as many determinants of health e.g., active travel, access to healthcare services, access to green/blue spaces for mental health, good air quality and a noise environment suitable for residential living. 	B044	<p>The Executive notes the issue raised.</p> <p>Section 4.2.3.6 'Healthcare' in Chapter 4 of the Draft Plan only relates to healthcare for the purposes of supporting and encouraging the provision of healthcare facilities within the Draft Plan area.</p> <p>The overall vision for Kiltiernan-Glenamuck, as set out on page 4 of the Draft LAP includes for the provision of a 10-minute neighbourhood, quality homes, healthy placemaking etc., which, when combined, would address many detriments to health. The vision for Kiltiernan-Glenamuck is realised through a suite of policies and objectives set across all chapters of the Draft LAP.</p> <p>Recommendation No change to Draft Plan.</p>
3.4.5 Section 4.2.3.7 Inclusion		
i. Welcomes reference to inclusion and being an age friendly plan.	B044	<p>The Executive notes and welcomes the commentary.</p> <p>Recommendation No change to Draft Plan.</p>
3.4.6 Section 4.3.6.1 Residential Density		
i. Submission considers that a zoning density policy for lands west of Enniskerry Road should be included within the KGLAP.	B038	<p>The Executive notes the issue raised.</p> <p>The Draft LAP sets out that "Given the topography of the Draft Plan area and the more rural character of lands to the west of the Draft LAP area, it is considered appropriate that residential</p>

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		<p>densities on lands zoned for residential development, located to the west of Kiltiernan Glenamuck Link Road, are generally 40 dwellings per hectare."</p> <p>Detail is set out in Policy KGLAP28 – 'Overall Residential Density'. This includes lands to the west of the Enniskerry Road.</p> <p>Recommendation No change to Draft Plan.</p>
ii. Submission requests adherence to density and height of buildings west of the Kiltiernan-Glenamuck Link Road (GLDR) of no more than 40 dwellings per hectare and 2 – 3 storeys high (9.2 metres), in particular to section 4.3.6.1 Residential Development of the Draft KGLAP.	B042	<p>The Executive notes the issues raised. Adherence to the policies and objectives in the Draft LAP will be carried out via the Development Management process.</p> <p>Recommendation No change to Draft Plan.</p>
<p>iii. Submission suggests an amendment to KGLAP28 as follows:</p> <ul style="list-style-type: none"> Policy KGLAP28 – Overall Residential Density: It is policy to promote and support residential densities in line with Policy Objective PHP18 of the County Development Plan 2022 – 2028 (or any subsequent Plan) and the 'Sustainable Residential Development and Compact Settlements Guidelines', 2024. In this regard, residential density shall generally accord with site development frameworks in Chapter 2 or where density is not provided for in Chapter 2: Lands located to the east of the Kiltiernan - Glenamuck Link Road shall achieve a residential density of 50-80 dwellings per hectare. 	B078	<p>The Executive notes the issue raised and would concur that the proposed amendment is appropriate.</p> <p>Recommendation Amend Policy KGLAP28 (pg. 49) as follows:</p> <p>"Policy KGLAP28 – Overall Residential Density: It is policy to promote and support residential densities in line with Policy Objective PHP18 of the County Development Plan 2022 – 2028 (or any subsequent Plan) and the 'Sustainable Residential Development and Compact Settlements Guidelines', 2024. In this regard, residential density shall generally accord with site development frameworks in Chapter 2 or where density is not provided for in Chapter 2:"</p>

Issues	Sub. No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> Lands to the west of the Kiltiernan Glenamuck Link Road shall achieve a residential density of 40-50 dwellings per hectare. <p>Smaller infill sites that are not of sufficient scale will be assessed on a case-by-case basis. Such sites may define their own density (as agreed by the planning authority) in response to the scale and form of surrounding development.</p>		
3.4.7 Section 4.3.6.2 Building Heights		
<p>i. Submission acknowledges that Policy KGLAP30 reflects instances where building height should be increased, however submission notes that this only relates to lands located to the east of the Kiltiernan – Glenamuck Link Road, or at certain locations along the Kiltiernan Road. Submission requests amendment to Policy KGLAP30 – Building Height as follows:</p> <p>“It is policy that building heights in the Draft KGLAP shall generally be 2-4 5 storeys and generally accord with the height guidance for each site development framework set out in Chapter 2, subject to policy objectives BHS1 and BHS2 of the Dún Laoghaire Rathdown County Development Plan 2022-2028 (SPPR 3 of the ‘Urban Development and Building Height; Guidelines for Planning Authorities’ 2018), or policy objectives in any subsequent County Development Plan.</p> <p>Having regard to SPPR3 in the Building Height Guidelines, there may be instances where an argument can be made for increased height</p>	<u>B103</u>	<p>The Executive notes the issue raised.</p> <p>The Draft LAP sets out a clear rationale for the height parameters contained therein and text in Section 4.3.6.2 ‘Building Heights’, Chapter 4, states:</p> <p>“Having regard to the topography of the Draft Plan area and provision for higher densities on lands located to the east of the Kiltiernan - Glenamuck Link Road, it is considered that taller buildings, or those of 4 storeys or more, could be located at appropriate locations on lands to the east of the Kiltiernan - Glenamuck Link Road. Building heights to the west of the Kiltiernan - Glenamuck Link Road should be limited to 2-3 storeys, however, taller 4-storey buildings may be considered on a case-by case basis where performance criteria, as set out in section 5 of the Building Heights Strategy in the County Development Plan, can be demonstrated to the satisfaction of the Planning Authority.”</p> <p>The Executive does not agree with the rationale for removing the text which references lands to the east of Kiltiernan - Glenamuck Link Road and Kiltiernan Road.</p> <p>Nor does it agree with replacement of 4 with 5 storeys.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>and/or taller buildings on lands located to the east of the Kiltiernan – Glenamuck Link Road, or at certain locations along the Kiltiernan Road. In circumstances where compliance with Policy Objective BHS1 and BHS2 of the County Development Plan (see Appendix 5) can be demonstrated additional height may be appropriate, subject to complying with; the safeguards outlined in the CDP, the policies and objectives of this Draft Local Area Plan and the performance based criteria as set out in Table 5.1 of the BH Strategy (See Appendix 5) or as set out in any subsequent County Development Plan”.</p>		<p>Recommendation No change to Draft Plan.</p>
<p>ii. Submission requests an amendment as follows: Policy KGLAP30 – Building Height: “It is policy that building heights in the Draft KGLAP shall generally be 2-4 5 storeys and generally accord with the height guidance for each site development framework set out in Chapter 2, subject to policy objectives BHS1 and BHS2 of the Dún Laoghaire Rathdown County Development Plan 2022-2028 (SPPR 3 of the ‘Urban Development and Building Height; Guidelines for Planning Authorities’ 2018), or policy objectives in any subsequent County Development Plan.</p> <p>Having regard to SPPR3 in the Building Height Guidelines, a building height of up to 5 storeys will be supported on lands located to the east of the Kiltiernan – Glenamuck Link Road, and there may be instances where an argument can be made for increased height and/or taller buildings</p>	<p><u>B078</u></p>	<p>The Executive notes the issue raised.</p> <p>The Draft LAP sets out a clear rationale for the height parameters contained therein and text in Section 4.3.6.2 ‘Building Heights’, Chapter 4, states:</p> <p>“Having regard to the topography of the Draft Plan area and provision for higher densities on lands located to the east of the Kiltiernan - Glenamuck Link Road, it is considered that taller buildings, or those of 4 storeys or more, could be located at appropriate locations on lands to the east of the Kiltiernan - Glenamuck Link Road. Building heights to the west of the Kiltiernan - Glenamuck Link Road should be limited to 2-3 storeys, however, taller 4-storey buildings may be considered on a case-by case basis where performance criteria, as set out in Section 5 of the Building Heights Strategy in the County Development Plan, can be demonstrated to the satisfaction of the Planning Authority.”</p> <p>The executive does not agree with the replacement of 4 with 5 storeys.</p>

Issues	Sub. No.	Executive's Response & Recommendation
on lands located to the east of the Kiltiernan – Glenamuck Link Road, or at certain locations along the Kiltiernan Road. In circumstances where compliance with Policy Objective BHS1 and BHS2 of the County Development Plan (see Appendix 5) can be demonstrated additional height may be appropriate, subject to complying with; the safeguards outlined in the CDP, the policies and objectives of this Draft Local Area Plan and the performance based criteria as set out in Table 5.1 of the BH Strategy (See Appendix 5) or as set out in any subsequent County Development Plan."		Recommendation No change to Draft Plan.
iii. Submission states that building height should be no higher than adjoining developments and additional units provided by building down.	<u>B092</u>	The Executive notes the issue raised but would not concur that building height should be no higher than adjoining developments. Recommendation No change to Draft Plan.
iv. Submission welcomes maximum of 4 storeys and up to 5 at some locations adjacent to transport infrastructure.	<u>B120</u>	The Executive welcomes support for height parameters in the Draft LAP. Recommendation No change to Draft Plan.
3.4.8 Section 4.3.6.4 Housing Options		
i. Submission requests significant amendments to objective H1 – Housing for all on the grounds that the request for 25% of total housing stock to be designed to facilitate an aging population/people with disability is an overly onerous blanket requirement that has no evidence base and does not accord with CDP. Amendment requested as follows:	<u>B078</u> <u>B103</u>	The Executive notes the issue raised. The Draft LAP is focused on the delivery of successful, well designed, and sustainable communities where new development integrates with existing communities and the existing built environment. As set out in the Draft Plan there is a clear policy base for Objective H1. National policy, including, 'Housing Options for our Ageing Population – Policy Statement' (2019) and 'National

Issues	Sub. No.	Executive's Response & Recommendation
<p>"Objective H1 – Housing for All: It is an objective to ensure the provision of a range of housing options within the Draft KGLAP area, that take account of all ages and abilities as residents progress through different stages of life, in accordance with Section 12.3.3.1 and Table 12.1 of the County Development Plan 2022 – 2028 (or any subsequent Plan) that all new residential developments of 10+ 50+ units shall include a minimum of 25% of the total housing stock to be designed to facilitate an ageing population / people with a disability. In this regard, the following provisions should be taken into account in the design and location of such units:</p> <ul style="list-style-type: none"> • Units should be designed having regard to the universal design homes principles. • Insofar as possible, units should be located at ground floor level with own door access. • Units should contain a minimum of 2 bedrooms. • Ideally, units should be located where residents have a short walk to site entrances that adjoin public transport links and amenities within or adjacent to the proposed development. • To assist with ease of access to public transport links and amenities, landscaping within any new development shall be designed having regard to ease of movement and legibility for all users. 		<p>Housing Strategy for Disabled People 2022-2027', have informed the relevant policy approach in relation to the provision of residential accommodation that would be suitable for older people and people with a disability.</p> <p>It is important to note that the 25% requirement does not require that these units are reserved for purchase or rent by a specific resident type, rather by incorporating units that are suitably designed to cater to the needs of older people and/or people with a disability offers accommodation options to this cohort who may otherwise feel excluded from new residential schemes.</p> <p>Recommendation No change to Draft Plan.</p>
<p>ii. Submission requests amendments to text relating to Housing for All – communal facilities objective and Appendix (as it is again considered overly onerous), so that it is more closely aligned with, Sustainable Urban Housing: Design</p>	<p>B078</p>	<p>The Executive notes the issue raised.</p> <p>In relation to communal facilities in new residential apartment developments of 50+ units it is considered that the requirement as set out in objective H2 that "Such communal facilities should have</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>Standards for new apartments, 2023, and the CDP which already adequately provide the opportunity for accessible communal facilities for residents of all ages and abilities if required for a particular development.</p> <p>Objective H2 Communal facilities: In line with the section 28 Guidelines "Sustainable Urban Housing: Design Standards for new apartments" the Planning Authority will encourage provision of accessible communal rooms and/or facilities for the use of future residents in new residential apartment developments of 50+ units. Such communal facilities should have regard to the needs of all future residents of all ages and abilities. Where such facilities are to be provided details of the management shall be submitted and agreed by the planning authority at application stage."</p>		<p>regard to the needs of all future residents of all ages and abilities." is important and should be retained.</p> <p>Recommendation No change to Draft Plan.</p>
<p>iii. Submissions request more homes with gardens for families, to create a sense of community and not apartments which are for city living.</p>	<p><u>B102</u> <u>B120</u></p>	<p>The Executive notes the issue raised.</p> <p>The new Section 28 Compact Settlement Guidelines allow for a variety of housing typologies which meet density requirements. It is considered that apartments are an important typology in term of achieving compact growth. Providing variety and choice and addressing changing household sizes. Well-designed apartments are also an option for larger household sizes.</p> <p>Recommendation No change to Draft Plan.</p>

3.5 Chapter 5 – Transport and Movement

Issues	Sub. No.	Executive's Response & Recommendation
3.5.1 Section 5.6.2 Kiltiernan – Glenamuck Active Travel		
i. Submission questions why there is an absence of any plan for improving Glenamuck Road from Brambledown development location eastwards to the Carrickmines roundabout.	<u>B001</u>	<p>The Executive notes the issues raised.</p> <p>The Draft LAP contains two objectives that relate to road improvements along the Glenamuck Road West (AT6) and East (AT7). These objectives seek to provide improved cycling facilities, footpaths, pedestrian crossings, as well as local junction tightening along that road.</p> <p>Recommendation No change to Draft Plan.</p>
ii. Submissions request improved pathways suitable in width for all users including wheelchair users, cyclists and prams with safe crossing points along, particularly along Glenamuck Road and Enniskerry Road.	<u>B001</u> <u>B050</u> <u>B064</u> <u>B092</u> <u>B107</u> <u>B109</u> <u>B120</u>	<p>The Executive notes the issues raised.</p> <p>The Draft LAP includes a number of objectives that seek to provide improved cycling facilities, footpaths, pedestrian crossings as well as junction improvements across the plan area (See Objectives A1-A9). All works to the roads will be carried out in accordance with DMURS and objective SM2- Accessibility, which states "It is an objective to ensure that future developments within the Kiltiernan-Glenamuck area, including its public realm and any Active Travel Networks, are accessible to all. The following guidance in particular should be referred to and followed:</p> <ul style="list-style-type: none"> • Design Manual for Urban Roads and Streets (DMURS). • Centre for Excellence in Universal Design (National Disability Authority). • Age-Friendly Ireland. • Safe Routes to School. • Child Friendly Cities & Communities Handbook." <p>Recommendation No change to Draft Plan.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>iii. Submission from the Department of Transport requests that the LAP reflects the 'United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)' which obliges the State to ensure access for persons with a disability – including within the physical environment and transportation. Welcomes the text of Objective SM2 – Accessibility, "It is an objective to ensure that future developments within Kiltiernan - Glenamuck area, including its public realm and Active travel networks are accessible to all".</p>	<p><u>B126</u></p>	<p>The Executive notes the issue raised and consider it appropriate to reference the mentioned UN convention.</p> <p>Recommendation Amend Appendix 2 (pg. 1) to include a reference to the UN Convention on the Rights of Persons with Disabilities (UNCRPD).</p>
<p>iv. Submission welcomes the proposed public transport hub to be located opposite The Blue Church and suggests that a hub for e-bike recharging is required in this location also.</p>	<p><u>B038</u></p>	<p>The Executive notes the issues raised.</p> <p>Objective PT4 of the Draft LAP deals with mobility hubs. This states "It is an objective to liaise with relevant stakeholders to establish the feasibility of providing an on-street Mobility Hub for Kiltiernan Village. At a minimum, the Mobility Hub should be highly visible and easily accessible to the public and include consideration of:</p> <ul style="list-style-type: none"> • Bus stop provision • Cycle parking • Car club bay(s) • EV Charging bays (EVCP) • E-mobility shared bikes/ scooters • Proximity to local services and, • Parcel collection points." <p>It is recommended that this objective is updated to include charging for e-bikes.</p> <p>Recommendation Amend objective PT4 (pg. 62) as follows:</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<ul style="list-style-type: none"> • "EV-Charging bays (EVCP) Electric Charging Infrastructure for EVs and E-bikes/scooters". (All other bullet points to remain).
v. Submission supports Active Travel plans contained within the LAP while noting a need for consideration of those who cannot drive or walk.	B046	<p>The Executive notes the issues raised.</p> <p>Recommendation No change to Draft Plan.</p>
vi. Submission supports the focus of the LAP on sustainable transport, walking and the provision of safer cycle routes noting that dedicated safe routes should be provided.	B059 B061 B064	<p>The Executive notes and welcome support for the LAP.</p> <p>Recommendation No change to Draft Plan.</p>
vii. Due to the focus on walking, cycling, reduction in car parking and provision of bus gates, concerns have been raised that the Draft Plan fails to have regard to the transport needs of older and less abled persons, rather the plan focuses on the needs of younger people.	B062	<p>The Executive notes the issue raised.</p> <p>The ABTA is the NTA's recommended approach to Transport Assessment for LAPs and the executive is satisfied that it provides a balanced assessment of transport needs within the area and in accordance with Policy Objective T4: Development of Sustainable Travel and Transport, as stipulated in the DLRCC CDP 2022 – 2028. This includes the needs of older and less able persons.</p> <p>Recommendation No change to Draft Plan.</p>
viii. Submission requests that Explorium is included in plans for sustainable travel corridors from Kiltiernan – Glenamuck to recreational locations, including Jamestown Park, Ticknick Park and Fernhill.	B080	<p>The Executive notes the issue raised.</p> <p>The best way to access Explorium from Kiltiernan by sustainable transport is by bicycle. At present that route would follow the Enniskerry Road. With future permeability links it may be possible to access these locations via permeability links through Jamestown Park.</p> <p>Recommendation No change to Draft Plan.</p>
ix. Submission supports the AT5 objective and proposed road upgrades along Ballycorus Road, including footpaths as far as the LAP boundary	B090	<p>The Executive notes the issue raised.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>and notes that the permitted development for Kilternan Cemetery Park is consistent with the 'Long Term Road Objective' in the CDP.</p> <p>Requests that Objective AT4 -AT5 Ballycorus Road includes the provision of footpaths on both sides of the road, as far as Kilternan Cemetery Park (as extended).</p>		<p>This objective relates to extending the LAP boundary and AT4 and AT5 as a result of any boundary expansion. Active Travel upgrades will also take place outside the LAP boundary. It is not considered that there is a need to extend the boundary at this location.</p> <p>Recommendation No change to Draft Plan.</p>
<p>x. Submission from the Department of Transport requests that the LAP reflects:</p> <ul style="list-style-type: none"> • The "whole of Government", 'National Disability Inclusion Strategy (NDIS) 2017-2022', which assigned specific actions to local authorities relating to accessible infrastructure including dishing of footpaths and accessible bus stops. • Fully accessible transport requires a 'whole journey approach', to ensure universal design approach to the built environment including – tactile paving, cycle paths, roads, pedestrian crossings, greenways and bus stops/shelters. • 'The Sustainable Mobility Policy' sets out a strategic framework to 2030 for active travel (walking and cycling) and public transport journeys and the accompanying action plan to 2025 to improve and expand sustainable mobility options and includes demand management and behavioural change measures to manage daily travel more efficiently and reduce journeys taken by private car. 	<u>B126</u>	<p>The Executive notes the issues raised.</p> <p>Recommendation It is recommended that Appendix 2 (pg. 1) reference the following documents:</p> <ul style="list-style-type: none"> • "National Disability Inclusion Strategy (NDIS) 2017-2022, • DMURS Interim Advice Note Covid-19 Pandemic Response for universal design, and accessibility for people with disabilities. • Department of Transport, National Sustainable Mobility Policy"

Issues	Sub. No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> DMURS Interim Advice Note Covid-19 Pandemic Response for universal design, and accessibility for people with disabilities. 		
xi. Submission requests footpath and cycle tracks be provided and connected to upgraded infrastructure prior to occupation of new units and temporary measures be provided along Glenamuck Road in the interim for the safety of users and the increased population in the area.	B092	<p>The Executive notes the issues raised.</p> <p>The Draft Lap sets out a comprehensive set of objectives relating to both active travel upgrades on the Glenamuck Road and also a number of different permeability links. Timelines and delivery mechanisms will in some instances be via the development management process.</p> <p>Recommendation No change to Draft Plan.</p>
xii. Submission suggests improvements to Ballybetagh Road with provision of speed bumps near entrance to Suttonfield, cycle path in both directions and galvanised metal barrier both ways between Suttonfield and Enniskerry Road cross to prevent serious accident.	B116	<p>The Executive notes the issues raised.</p> <p>During the Draft plan making process, DLRCC's Traffic and Road Safety section met with the developers of Suttonfield last year. Following this meeting, a number of modifications were proposed at this location to ensure there would be adequate forward visibility of oncoming traffic for those entering and existing the estate. This work has been carried out and the sightlines are now considered satisfactory.</p> <p>Under objective AT8, the Draft LAP proposes a number of additional measures along Ballybetagh Road including establishing a transition zone between Bishops Lane and the Sutton Field vehicular entrance, delivering Gateway improvements at the Sutton Field vehicular entrance to demarcate the beginning of the 30km/h speed limit, Safe Routes to School traffic- calming improvements between the Enniskerry-Ballybetagh Junction and the Sutton Field vehicular entrance, provision of crossing points at desire lines and re-allocation of on-street parking spaces for active travel and public realm improvements.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		Recommendation No change to Draft Plan.
3.5.2 Section 5.6.3 Cycle Parking (CP)		
i. Transport and Movement chapter should emphasise secure parking for bicycles and other forms of active travel and to include bike sharing /libraries to increase active travel.	<u>B044</u>	Section 5.6.3 of the Draft Plan addressees Cycle Parking and includes a detailed objective CP1 Relating to provision of cycle parking. Recommendation No change to Draft Plan.
3.5.3 Section 5.6.4 Permeability		
General Permeability Issues		
i. Submissions: <ul style="list-style-type: none"> welcomes most new development in the area but would like interconnectedness for pedestrians between the estates to be mandated as part of any planning approval. raises concerns in relation to interconnecting estates for the following reasons: <ul style="list-style-type: none"> cul-de-sacs add safety for children's play risk of anti-social behaviour in dark laneways The policy should be re-examined. 	<u>B021</u> <u>B038</u>	The Executive notes the issues raised. Opposing views are expressed in submission with one in support of interconnections between estates and another opposed. The Draft LAP proposes a number of Active Travel (11 no.) and permeability routes (14 no.) across the plan area. These routes will primarily serve cyclists and pedestrians and will greatly improve connectivity between the housing developments and services in the area. Provision of same is very much in line with national and local policy on permeability and integration of transport and land use planning. Provision may take place via the Development Management process. Recommendation No change to Draft Plan.
ii. Submissions support the ten-minute neighbourhood. Pedestrian/cyclist access between neighbourhoods needs to be a priority to reduce travel time	<u>B055</u>	The Executive notes and welcomes support for the 10-minute neighbourhood concept and permeability as set out in Chapter 5 of the Draft LAP.

Issues	Sub. No.	Executive's Response & Recommendation
		Recommendation No change to Draft Plan.
iii. Submission requests that lighting and conditions of laneways be upgraded and taken in charge by dlr.	<u>B092</u>	The Executive notes the issue raised. Taking in charge of an area is dealt with by the Building Control section and the lighting of lanes is an operational matter. Neither matter falls under the remit of a Local Area Plan. Recommendation No change to Draft Plan.
Issues Raised in relation to Key Permeability Routes		
iv. Submissions raise concerns regarding provision of permeability links PY2 and PY3: <ul style="list-style-type: none"> • Queries whether there will be 24hr CCTV provided to counter potential for anti-social behaviour should PY2 be implemented. • Notes there is a link already in place from Sutton Field to Ballybetagh Road which should be adequate for access to Our Lady of the Wayside School. • Creation of additional entrances/exits would increase the risk of unauthorised access, crime/theft, and would cause safety and security issues. • Would be difficult to monitor pedestrian movements and this could result in accidents and crime especially at night. • Increase in number of pedestrian entrances from two to four is unnecessary and would increase noise levels and become a hotspot for littering and loitering. • Creates the need for maintenance of pathways, lighting and signage. 	<u>B040</u> <u>B099</u> <u>B107</u> <u>B109</u> <u>B110</u> <u>B111</u> <u>B112</u> <u>B114</u> <u>B115</u> <u>B116</u> <u>B117</u> <u>B118</u>	<p>The Executive notes the issues raised.</p> <p>PY 2 will run from Enniskerry Road to Our Lady of the Wayside school via Suttonfield and PY3 will run from Suttonfield to Kilternan Wood.</p> <p>The Draft LAP serves as a high-level policy document which sets out a number of transport related policies and objectives that seek to better integrate land-use and transport planning, support fully permeable 10-minute neighbourhoods, and provide attractive, high-quality, inclusive and connected walking and cycling networks that are accessible, safe and facilitate a sense of security.</p> <p>The Draft LAP also supports a modal shift away from the private car to more sustainable forms of transport.</p> <p>In order to support these policies, the Draft LAP proposes a number of permeability links throughout the plan area. 14 links in total are proposed, including one between Enniskerry Road and Suttonfield (PY2), the location of which is indicatively shown on the Draft LAP. PY2 seeks to enable greater connectivity between the school, neighbourhood centre and residential development.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> Minimal gain to Suttonfield becoming a thoroughfare for population of Kilternan to access the school when there are available footpaths. 		<p>PY2 is additionally supported by the following planning permission Reg. Ref. D24A/0685/WEB which shows a permeability link in plan form on the drawing between Suttonfield and Enniskerry Road. It is not anticipated that the link would give rise to any significant privacy, security, safety, noise or rubbish issues.</p> <p>It is considered that PY3 which will run from Suttonfield to Kilternan Wood will also greatly improve connectivity.</p> <p>Recommendation No change to Draft Plan.</p>
<p>v. Does not recommend through-roads between Kilternan Wood to Sutton Field as this will cause issues for parking and anti-social behaviour.</p>	<p><u>B067</u></p>	<p>The Executive notes the issues raised.</p> <p>The Draft LAP serves as a high-level policy document which sets out a number of transport related policies and objectives that seek to better integrate land-use and transport planning, support fully permeable 10-minute neighbourhoods, and provide attractive, high-quality, inclusive and connected walking and cycling networks that are accessible, safe and facilitate a sense of security. The Draft LAP also supports a modal shift away from the private car to more sustainable forms of transport.</p> <p>In order to support these policies, the Draft LAP proposes a number of permeability links throughout the plan area. 14 links in total are proposed, including one between Suttonfield and Kilternan Wood (PY3). This link seeks to enable greater connectivity to the schools, neighbourhood centre residential development. It would also afford greater connectivity to those living in the area. The proposed link would not serve cars.</p> <p>PY3 is further supported by the following planning permissions Reg. Refs. LRD23A/0358 and ABP30984621, which show a permeability link between Suttonfield and Kilternan Wood.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>It is not anticipated that the link would give rise to any significant privacy, security, safety, noise or rubbish issues. In terms of delivery, the relevant areas would need to be taken in charge in order for the link to be delivered. In addition, a detailed design process would need to be undertaken which would look at engineering feasibility, access, and safety including public lighting among other among other matters. Any significant transport projects may also be subject to a public consultation process and the feedback from this process would then be taken into account in terms of the links delivery. Recommendation- No change to Draft Plan.</p> <p>Recommendation No change to Draft Plan.</p>
<p>vi. Submissions raise concerns in relation to key permeability link PY9 - Chapel Hill to Bishops Gate for reasons including:</p> <ul style="list-style-type: none"> • Impact on Privacy • Security reduction, including increased risk of burglary by creation of two routes out of Chapel Hill. • Safety for pedestrians and children walking in front of driveways. • Safety for drivers. • Safety concerns due to narrow roads and footpaths. • Traffic. • Noise pollution. • Increased rubbish. • Potential capacity issues in the playground in Chapel Hill. • Potential for teenagers to cause anti-social behaviour in Chapel Hill. 	<p><u>B005</u> <u>B006</u> <u>B007</u> <u>B009</u> <u>B010</u> <u>B011</u> <u>B012</u> <u>B013</u> <u>B014</u> <u>B015</u> <u>B016</u> <u>B019</u> <u>B020</u> <u>B022</u> <u>B023</u> <u>B025</u> <u>B026</u> <u>B027</u> <u>B028</u> <u>B029</u></p>	<p>The Executive notes the issues raised.</p> <p>The Draft LAP serves as a high-level policy document which sets out a number of transport related policies and objectives that seek to better integrate land-use and transport planning, support fully permeable 10-minute neighbourhoods, and provide attractive, high-quality, inclusive and connected walking and cycling networks that are accessible, safe and facilitate a sense of security.</p> <p>The Draft LAP also supports a modal shift away from the private car to more sustainable forms of transport. In order to support these policies, the Draft LAP proposes a number of permeability links throughout the plan area. 14 links in total are proposed, including one between Chapel Hill/Glebe Road and Bishops Gate (PY9).</p> <p>The link would afford greater connectivity to those living in the two estates and is very much in line with transport policy. PY9 seeks to enable greater connectivity to the schools, tennis courts, the</p>

Issues	Sub. No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> • Increase in noise level, particularly during evenings and weekends. • Concern that insurance and management fees will increase for residents of Chapel Hill. • Impact on house prices. • Residents on both sides of the wall in both estates do not want to live beside an open walkway/footpath. • Opinion that link is not needed as traffic will be much less on Enniskerry Road with less risk to pedestrians when GDDR scheme is complete • Increase in foot traffic from additional families and children from Bishop's Gate • Increase in accidents, in particular from non-Chapel Hill Residents • Additional users will overburden the playground and children of Chapel Hill would be competing with non-residents to use private playground. • Children can play safely at end of cul de sac in Chapel Hill with no traffic. • A better alternative option could be through Glebe House Sheltered accommodation. • Would prefer that a secure footpath from Chapel Hill to Stepside Village be provided instead of PY9 • There will be no reduction of distance travelled from Bishops Gate to the Church of Ireland school and local amenities, rather than via Enniskerry Road. • Increased likelihood of vandalism 	<p><u>B030</u> <u>B032</u> <u>B033</u> <u>B034</u> <u>B035</u> <u>B043</u> <u>B047</u> <u>B049</u> <u>B058</u> <u>B065</u> <u>B068</u> <u>B076</u> <u>B077</u> <u>B079</u> <u>B087</u> <u>B088</u> <u>B093</u> <u>B097</u> <u>B101</u> <u>B121</u> <u>B122</u> <u>B113</u></p>	<p>wooded area to the west of Bishops Gate and Kiltarnan Parish Centre. The proposed link would not serve cars.</p> <p>The link is further supported by the following planning permissions Reg. Ref. D18A/0083 (Bishops Gate) which refers to a permeability link on the drawings, and Reg. Ref. D16A/0586 (Chapel Hill/Glebe Road) as detailed in Condition M6 which states "The northwestern and southeastern ends of Roadway 03 shall extend up to the boundary line of the site, including provision for turning vehicles, with no private or public open space strips between the ends of Roadway 03 and the site boundary wall, as well as at the western end of Roadway 01, in order to provide for possible future accesses/permeability links to the adjacent sites. REASON: In the interest of proper planning and sustainable development of the area'.</p> <p>It is not anticipated that the link would give rise to any significant privacy, security, safety, noise or littering issues. In a recent meeting between the forward planning team and An Garda Síochána it was confirmed that in general the anticipated concerns of residents do not arise when pedestrian and cycle links are well designed, overlooked and used.</p> <p>In terms of delivery, both estates would need to be taken in charge in order for the link to be delivered. In addition, a detailed design process would need to be undertaken which would look at engineering feasibility, access, and safety including public lighting among other matters.</p> <p>Any significant transport projects may also be subject to a public consultation process and the feedback from this process would then be taken into account in terms of the links delivery.</p> <p>Recommendation</p>

Issues	Sub. No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> • Notes that taking in charge of Chapel Hill has not been completed. • Would result in hundreds of children using the small playground and green area adding to costs for maintenance and insurance. • Existing outdoor shelter and firepit for Kilternan Scouts located to north of Chapel Hill would be accessible over a low wooden fence and would be attractive to children and teenagers risking additional antisocial behaviour. • Limited benefits for other estates, including Bishops Gate as there would be minimal time savings. • The potential risks, safety and privacy concerns of PY9 outweigh perceived benefits and it would not be in the interests of Chapel Hill or the proper planning and sustainable development of the area. • Given the extent of local opposition that further public consultation and consent from the residents of Chapel Hill and Bishops Gate. • Submitter was unaware when purchasing house that there would be a link between Chapel Hill and Bishops Gate. • Chapel Hill has not been taken in charge. The boundary wall between the estates is owned and managed by Chapel Hill Management Company and would require their approval to remove the wall and this would not be given. 		No change to Draft Plan.

Issues	Sub. No.	Executive's Response & Recommendation
<p>vii. Submission supports key permeability link PY9 - Chapel Hill to Bishops Gate for reasons including:</p> <ul style="list-style-type: none"> • Improved child safety • Better quality of movement to Kiltiernan Church of Ireland National School. • Easier access to the lawn tennis club at Kiltiernan Church 	B008	<p>The Executive notes and welcomes the support for the proposed permeability link PY9 – Chapel Hill to Bishops Gate.</p> <p>Recommendation No change to Draft Plan.</p>
<p>viii. Objects to PY10 via private lane and private land on Dixon Lane. Submissions note that there is a Right-of-Way (RoW) along Dixon Lane towards Dingle Glen, however, this RoW is blocked and no longer exists. In this regard the RoW should be removed.</p>	B073 B074	<p>A number of proposed permeability links including PY10 seek to improve journey quality to and from sport, leisure and amenity areas in the Kiltiernan area.</p> <p>These links include formalising existing desire lines to provide more direct access from existing and future developments as well as creating new links.</p> <p>In terms of delivery, a detailed design process would need to be undertaken which would look at engineering feasibility, access, and safety among other matters. Any significant transport projects may also be subject to a public consultation process and the feedback from this process would then be taken into account in terms of the links delivery.</p> <p>Recommendation No change to Draft Plan.</p>
<p>ix. Submission requests that key permeability link PY14 (pedestrian/cycle link into Rockville Drive) is omitted as it will not improve permeability for Cairnbrook, Glenamuck Cottages or SDF8.</p>	B082	<p>The Executive notes the issues raised.</p> <p>The Draft LAP serves as a high-level policy document which sets out a number of transport related policies and objectives that seek to better integrate land-use and transport planning, support fully permeable 10-minute neighbourhoods, and provide attractive, high-quality, inclusive and connected walking and cycling networks that are accessible, safe and facilitate a sense of security. The</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>Draft LAP also supports a modal shift away from the private car to more sustainable forms of transport.</p> <p>In order to support these policies, the Draft LAP proposes a number of permeability links throughout the plan area. 14 links in total are proposed, including one from Cairnbrook to Rockville Drive and Springfield Lane (PY14). PY14 principally seeks to provide greater connectivity between the aforementioned residential estates among other things. PY14 is additionally supported by the following planning permission Reg. Ref. LRD24A/0870/WEB which shows a permeability link in plan form on the drawing to the adjacent development. This application is currently on appeal to An Bord Pleanála.</p> <p>It is not anticipated that the link would give rise to any significant privacy, security, safety, noise or rubbish issues.</p> <p>Recommendation No change to Draft Plan.</p>
3.5.4 Section 5.6.5 Public Transport Network		
<p>i. Submissions:</p> <ul style="list-style-type: none"> State that public transport provision is still inadequate even with new routes. There is a need to improve public transport provision serving the area. Have concerns with the new Bus Connects routes which are far less reliable and timely than the previous services they have replaced. Consider that 15-minute frequency supports a switch to public transport Believe public transport does not have capacity for new residents and 10-minute neighbourhood will not be achieved as 	<p>B038 B050 B021 B046 B051 B052 B053 B054 B055 B056 B057 B064 B067 B092 B094</p>	<p>The Executive notes the issues raised.</p> <p>As part of BusConnects plans for the area, Kiltiernan-Glenamuck will eventually be served by 4 new routes with substantial increased frequency over and above the current/previous 44, 63/63A and 118 bus routes. Although TII and the NTA are primarily responsible for providing public transport in Dun Laoghaire Rathdown, the Draft 123Plan does contain two objectives relating to public transport including Objective PT1 which states "It is an objective (for DLR) to work with the National Transport Authority with a view to increasing bus frequencies serving the Study Area as development is progressed" and Objective PT2 which relates to increased Bus Stop Provision.</p> <p>Recommendation</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>children must be driven to school outside the area because there is no capacity locally.</p> <ul style="list-style-type: none"> • Considers the switch to new Bus Connect routes to be inefficient as buses on routes L26, L27 and 118 are infrequent and irregularly timed. Requests that: • the L26. becomes more frequent (every 15 min) • The L27 returns to proving a direct link to Dún Laoghaire. • The 44 route has a half hourly service. • There is an increase to the 118 frequency. • Direct bus route to Dun Laoghaire be reinstated. 	<p><u>B116</u> <u>B123</u></p>	<p>No change to Draft Plan.</p>
<p>ii. Submissions:</p> <ul style="list-style-type: none"> • Raise Concerns regarding the new L26 bus route now operating from Kiltiernan as the route no longer goes to the secondary school in Ballyogan (SETSS) only stopping at Carrickmines retail park before continuing on. • Suggests changes to route frequencies and timings to improve journeys to schools and Luas. 	<p><u>B024</u> <u>B046</u></p>	<p>The Executive notes the issues raised.</p> <p>As part of BusConnects plans for the area, Kiltiernan will eventually be served by 4 new routes with substantial increased frequency over and above the current/previous 44, 63/63A and 118 bus routes. Although TII and the NTA are primarily responsible for providing public transport in Dun Laoghaire Rathdown, the Draft Plan does contain two objectives relating to public transport including Objective PT1 which states "It is an objective (for DLR) to work with the National Transport Authority with a view to increasing bus frequencies serving the Study Area as development is progressed" and Objective PT2 which relates to increased Bus Stop Provision.</p> <p>Recommendation No change to Draft Plan.</p>
<p>iii. Submissions:</p> <ul style="list-style-type: none"> • States that there is an urgent need for a subsidised shuttle bus to be provided 	<p><u>B041</u> <u>B123</u></p>	<p>The Executive notes the issues raised.</p> <p>As part of BusConnects plans for the area, Kiltiernan will eventually be served by 4 new routes with substantial increased</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>between Kiltiernan to Stepside and then to the secondary school in Ballyogan.</p> <ul style="list-style-type: none"> Suggests provision of a shuttle bus to the Luas. 		<p>frequency over and above the current/previous 44, 63/63A and 118 bus routes. Although TII and the NTA are primarily responsible for providing public transport in Dun Laoghaire Rathdown, the Draft Plan does contain two objectives relating to public transport including Objective PT1 which states "It is an objective (for DLR) to work with the National Transport Authority with a view to increasing bus frequencies serving the Study Area as development is progressed" and Objective PT2 which relates to increased Bus Stop Provision.</p> <p>Recommendation No change to Draft Plan.</p>
<p>iv. Submissions:</p> <ul style="list-style-type: none"> Considers the new route L26 to be inadequate for connective requirements between Kiltiernan and the nearest Luas stop at Ballyogan Wood. States that the new L26 does not allow for access to Ballyogan Road, Dunnes Stores and is unreliable and cancelled at short notice. Suggests that the Local Authority should engage with the NTA about having a regular bus that runs between Kiltiernan village and Dundrum or Ballaly Luas stop via the Enniskerry Road / Sandyford Road. 	<p><u>B047</u> <u>B070</u></p>	<p>The Executive notes the issues raised.</p> <p>As part of BusConnects plans for the area, Kiltiernan will eventually be served by 4 new routes with substantial increased frequency over and above the current/previous 44, 63/63A and 118 bus routes. Although TII and the NTA are primarily responsible for providing public transport in Dun Laoghaire Rathdown, the Draft Plan does contain two objectives relating to public transport including Objective PT1 which states "It is an objective (for DLR) to work with the National Transport Authority with a view to increasing bus frequencies serving the Study Area as development is progressed" and Objective PT2 which relates to increased Bus Stop Provision.</p> <p>Recommendation No change to Draft Plan.</p>
<p>v. The KGLAP fails to take into account capacity issues of the Luas noting that it is already full at peak hours. It is unclear how this can accommodate a significant increase in population.</p>	<p><u>B062</u></p>	<p>The Executive notes the issue raised.</p> <p>TII and the NTA are primarily responsible for providing public transport in Dun Laoghaire-Rathdown. The ABTA process and the Draft Local Transport Plan which inform the LAP have taken into</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>account Luas capacity and also bus connects and the associated changes impacting on the Kiltiernan Glenamuck area.</p> <p>Recommendation No change to Draft Plan.</p>
<p>vi. Submission from the Department of Transport requests that the LAP reflects: The Connecting Ireland Rural Mobility Plan (2022-2025)' which is a major national public transport initiative which aims to increase public transport connectivity, particularly for people living outside of major cities and towns.</p>	<p><u>B126</u></p>	<p>The Executive notes the issue raised.</p> <p>While Kiltiernan - Glenamuck is located at the outer of the built-up area it is not considered that "The Connecting Ireland Rural Mobility Plan (2022-2025)' is of relevance.</p> <p>Recommendation No change to Draft Plan.</p>
<p>vii. Submission considers that new bus routes and connections should be guaranteed for connection to local infrastructure in advance of granting planning permission because, at present, cars are needed to connect to Luas and DART.</p>	<p><u>B092</u></p>	<p>The Executive notes the issues raised.</p> <p>As part of BusConnects plans for the area, Kiltiernan will eventually be served by 4 new routes with substantial increased frequency over and above the 44, 63/63A and 118 bus routes. Although TII and the NTA are primarily responsible for providing public transport in Dún Laoghaire - Rathdown, the Draft Plan does contain two objectives relating to public transport including Objective PT1 which states, 'It is an objective (for DLR) to work with the National Transport Authority with a view to increasing bus frequencies serving the Study Area as development is progressed' and Objective PT2 which relates to increased Bus Stop Provision.</p> <p>The Draft LAP includes a number of objectives that seek to provide improved cycling facilities, footpaths, pedestrian crossings as well as junction improvements across the plan area.</p> <p>These works will be done in accordance with DMURS and objective SM2- Accessibility which states 'It is an objective to ensure that future developments within the Kiltiernan-Glenamuck area,</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>including its public realm and any Active Travel Networks, are accessible to all.</p> <p>The following guidance in particular should be referred to and followed:</p> <ul style="list-style-type: none"> • Design Manual for Urban Roads and Streets (DMURS). • Centre for Excellence in Universal Design (National Disability Authority). • Age-Friendly Ireland. • Safe Routes to School. • Child Friendly Cities & Communities Handbook. <p>Recommendation No change to Draft Plan.</p>
viii. Public transport improvements are needed in terms of bus frequency, shelters, real time information and suggests introduction of new routes to serve second and third level education destinations.	<u>B116</u>	<p>The Executive notes the issues raised.</p> <p>As part of BusConnects plans for the area, Kiltiernan will eventually be served by 4 new routes with substantial increased frequency over and above the 44, 63/63A and 118 bus routes. Although TII and the NTA are primarily responsible for providing public transport in Dun Laoghaire Rathdown, the Draft Plan does contain two objectives relating to public transport including Objective PT1 which states, 'It is an objective (for DLR) to work with the National Transport Authority with a view to increasing bus frequencies serving the Study Area as development is progressed' and Objective PT2 which relates to increased Bus Stop Provision.</p> <p>The Draft LAP includes a number of objectives that seek to provide improved cycling facilities, footpaths, pedestrian crossings as well as junction improvements across the plan area.</p> <p>These works will be done in accordance with DMURS and objective SM2- Accessibility which states 'It is an objective to ensure that future developments within the Kiltiernan-Glenamuck area,</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>including its public realm and any Active Travel Networks, are accessible to all. The following guidance in particular should be referred to and followed:</p> <ul style="list-style-type: none"> • Design Manual for Urban Roads and Streets (DMURS). • Centre for Excellence in Universal Design (National Disability Authority). • Age-Friendly Ireland. • Safe Routes to School. • Child Friendly Cities & Communities Handbook. <p>Recommendation No change to Draft Plan.</p>
3.5.5 Section 5.6.6 Road and Traffic Management		
<p>i. Submissions request road improvements / traffic calming measures on Ballybetagh Road to improve safety, particularly around the Suttonfield entrance citing recent accidents in the area. The following measures have been requested:</p> <ul style="list-style-type: none"> • Speed ramps. • Improved traffic management be provided locally for safety of users. 	<p>B002 B092 B107 B109</p>	<p>The Executive notes the issues raised.</p> <p>During the Draft plan making process, DLRCCs Traffic and Road safety section met with the developers for Suttonfield last year. Following this meeting, a number of modifications were proposed at this location to ensure there would be adequate forward visibility of oncoming traffic for those entering and existing the estate. This work has been carried out and the sightlines are now considered satisfactory.</p> <p>In addition, under objective AT8, the Draft LAP proposes a number of additional measures along Ballybetagh Road including establishing a transition zone between Bishops Lane and the Sutton Field vehicular entrance, delivering Gateway improvements at the Sutton Field vehicular entrance to demarcate the beginning of the 30km/h speed limit, Safe Routes to School traffic- calming improvements between the Enniskerry-Ballybetagh Junction and the Sutton Field vehicular entrance, provision of crossing points at desire lines and re-allocation of on-street parking spaces for active travel and public realm improvements.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		Recommendation No change to Draft Plan.
ii. Submission: <ul style="list-style-type: none"> Objects to reduction of speed limits on main roads within Kiltiernan-Glenamuck and would prefer the speed limit to remain at 50kph. Raises concerns around the reduction of speed limits to 30kmph. 	B021 B053	The Executive notes the issues raised. The Draft LAP contains a number of traffic calming measures including a proposed reduction in the speed limit in the village area to 30km/h, similar to many towns and villages across Dun Laoghaire Rathdown that have recently undergone a speed limit reduction. A 30km/h speed limit in Kiltiernan would provide for a quieter, cleaner, safer environment, where people would be more likely to choose to walk or cycle. It also results in less noise and pollution. The aim of these measures (AT1- AT11 and RTM1- RM5) in combination with the GDRS, and the rest of the objectives, is to make Kiltiernan Village a much more attractive environment to live, shop in and walk/cycle in and through. Recommendation No change to Draft Plan.
iii. Submission raises concern in relation to proposed traffic calming measures along Enniskerry Road as the would unduly restrict local vehicular movements.	B038	The Executive notes the issues raised. The Draft LAP includes a number of traffic calming measures along Enniskerry Road including a proposed reduction in the speed limit along Enniskerry Road to 30km/h, a new shuttle system/cycle bypass, local junction tightening and raised pedestrian crossings at desire lines (AT1- AT3). The aim of these measures in combination with the GDRS and the rest of the objectives is to make Enniskerry Roa and Kiltiernan Village a much more attractive environment to live, shop in and walk/cycle in and through. Recommendation No change to Draft Plan.
iv. Submissions request improved safety, visibility and traffic calming measures along Enniskerry	B050 B057	The Executive notes the issues raised.

Issues	Sub. No.	Executive's Response & Recommendation
Road including specific measures at entrances to residential developments such as Bishops Gate.	<u>B059</u> <u>B070</u> <u>B107</u> <u>B109</u>	<p>The Draft LAP includes a number of traffic calming measures along Enniskerry Road including a proposed reduction in the speed limit along Enniskerry Road to 30km/h, a new shuttle system/cycle bypass, local junction tightening and raised pedestrian crossings at desire lines (AT1- AT3). The aim of these measures in combination with the GDRS and the rest of the objectives is to make Enniskerry Roa and Kiltiernan Village a much more attractive environment to live, shop in and walk/cycle in and through.</p> <p>Recommendation No change to Draft Plan.</p>
<p>v. Submission raises issues around the condition of roads at:</p> <ul style="list-style-type: none"> • Bishops Gate • Golden Ball 	<u>B053</u>	<p>The Executive notes the issues raised.</p> <p>There are a number of developments currently being constructed close to Bishops Gate Road and Golden Ball. It is anticipated when these are completed that the road's condition will improve significantly.</p> <p>Recommendation No change to Draft Plan.</p>
vi. Submission states that public transport needs improving and should include a linking bus service to Luas, Dart and N11 quality Bus corridor.	<u>B045</u>	<p>The Executive notes the issues raised.</p> <p>As part of BusConnects plans for the area, Kiltiernan will eventually be served by 4 new routes with substantial increased frequency over and above the current/previous 44, 63/63A and 118 bus routes. Although TII and the NTA are primarily responsible for providing public transport in Dun Laoghaire Rathdown, the Draft Plan does contain two objectives relating to public transport including Objective PT1 which states "It is an objective (for DLR) to work with the National Transport Authority with a view to increasing bus frequencies serving the Study Area as development is progressed" and Objective PT2 which relates to increased Bus Stop Provision.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		Recommendation No change to Draft Plan.
vii. Submission believes traffic-calming measures are needed on Enniskerry and Ballycorus Roads.	B045	<p>The Executive notes the issues raised.</p> <p>The Draft LAP includes a number of traffic calming measures along Enniskerry and Ballycorus Roads including a proposed reduction in the speed limit to 30km/h, a new shuttle system/cycle bypass, local junction tightening, improved footpaths, cycle options and raised pedestrian crossings at desire lines (AT1- AT5). The aim of these measures in combination with the GDRS and the rest of the objectives is to make Enniskerry Road/Ballycorus Road and Kiltiernan Village a much more attractive environment to live, shop in and walk/cycle in and through.</p> <p>Recommendation No change to Draft Plan.</p>
viii. Submission: <ul style="list-style-type: none"> • Requests the provision of safe crossing for the Stepside Education Together National school bus. • Requests a mirror for exiting Bishops Gate. 	B059	<p>The Executive notes the issues raised.</p> <p>Due to the poor alignment of the existing Enniskerry Road, there currently is no place to provide a safe pedestrian crossing. The proposed traffic calming of the Enniskerry Road will provide opportunities to construct safe crossings at several locations.</p> <p>The details are beyond the remit of the Draft LAP.</p> <p>Mirrors are not approved by the Council because drivers who are unfamiliar with them normally underestimate distances to oncoming traffic.</p> <p>Recommendation</p>

Issues	Sub. No.	Executive's Response & Recommendation
		No change to Draft Plan.
ix. Submission requests improvements to the traffic light sequence at Golden Ball Junction.	B064	<p>The Executive notes the issues raised.</p> <p>Sequencing of traffic signals is an operational matter. The upgrade of the junction will include an upgrade of the traffic signals and a review of the traffic signal sequence.</p> <p>Recommendation No change to Draft Plan.</p>
x. Submission welcomes the completed Blackglen Road improvement scheme but notes that sections of the Enniskerry Road and Hillcrest Road need to be improved. It is requested that dlr prioritises the upgrade of local roads.	B080	<p>The Executive notes the issues raised.</p> <p>While Hillcrest Road is outside the area of the LAP, it is a 6-year objective in the dlr County Development Plan 2022 - 2028 and is currently at preliminary design stage with the Capital Projects Section. A major upgrade of the Enniskerry Road within the area of the LAP is currently under construction.</p> <p>Recommendation No change to Draft Plan.</p>
3.5.6 Section 5.6.7 Car Parking		
<p>i. Submissions raise concerns in relation to a lack of car parking in various areas including in proximity to our Lady of the Wayside school and request that consideration be given to:</p> <ul style="list-style-type: none"> • short stay parking area close to the Enniskerry Road / Ballybetagh Road. • Adequate parking provision within the village centre. • Provision of a park and ride. 	B042 B060 B061 B098	<p>The Executive notes the issues raised.</p> <p>The Draft LAP does not propose to remove any car parking from the plan area, but instead make it more attractive, for those who can, to walk and cycle in and through. Notwithstanding, as part of the recently granted planning permission for Kiltiernan Village (Reg Ref LRD24A/0597), c. 87 non-residential car parking spaces will be provided in the village area opposite Wayside church (where the new neighbourhood centre will be).</p> <p>There are no plans for provision of a park and ride in Kiltiernan Glenamuck. Given the draft LAP commitment to the ten-minute neighbourhood, it is considered that having regard to the location of land parcels being developed for residential development in the</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>area residents will be able to walk to local bus stops. The closest park and ride is located at Carrickmines.</p> <p>Recommendation No change to Draft Plan.</p>
<p>ii. States that there is a need to provide safe drop-off zones at schools and creches in the area.</p>	<p>B046</p>	<p>The Executive notes the issues raised.</p> <p>The Draft LAP does not propose to remove any car parking, but instead make it more attractive, for those who can, to walk and cycle. As part of this objective AT8 and AT9 seek to deliver 'Safe Routes to School' traffic calming improvements between the Enniskerry – Ballybetagh Junction and Sutton Field vehicular entrance, and outside of the Church of Ireland N.S.</p> <p>Recommendation No change to Draft Plan.</p>
<p>iii. Requests parking provision be ensured within the village for those who are not within walking distance of the village.</p>	<p>B045</p>	<p>The Executive notes the issues raised.</p> <p>The Draft LAP does not propose to remove any car parking from the plan area, but instead make it more attractive, for those who can, to walk and cycle in and through. Notwithstanding, as part of the recently granted planning permission for Kiltiernan Village (Reg Ref LRD24A/0597), c. 87 non-residential car parking spaces will be provided in the village area opposite Wayside church (where the new neighbourhood centre will be).</p> <p>Recommendation No change to Draft Plan.</p>
<p>iv. Submission considers that Plan will result in serious injury in the area by reducing parking and displacing it into surrounding housing estates. Submission requests provision of public car park in Kiltiernan.</p>	<p>B098</p>	<p>The Executive notes the issues raised.</p> <p>Car Parking standards are set by National policy and the County Development Plan, with the objective to cater for the needs of a development while promoting sustainable travel. The Draft LAP proposes to improve active travel facilities and to provide for the</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>increased public transport services which will be generated by the increasing population. Any illegal parking ("fly-parking") can be controlled by statutory regulations (e.g. double yellow lines, Pay and Display parking).</p> <p>Recommendation No change to Draft Plan.</p>
<p>v. Submission requests that 1-2 car parking spaces be provided per unit because of unreliable transport infrastructure and distance from services, schools, retail services etc which are not accessible for walkers. Provision of less than one space per unit results in illegal parking.</p>	<p><u>B092</u></p>	<p>The Executive notes the issues raised.</p> <p>Car Parking standards are set by National policy and the County Development Plan, with the objective to cater for the needs of a development while promoting sustainable travel. The LAP proposes to improve active travel facilities and to provide for the increased public transport services which will be generated by the increasing population. Any illegal parking ("fly-parking") can be controlled by statutory regulations (e.g. double yellow lines, Pay and Display parking).</p> <p>Recommendation No change to Draft Plan.</p>
<p>vi. Submission suggest that because the Circle K has installed 2 electric car chargers that valuable car spaces should not be dedicated for electric charging in the village.</p>	<p><u>B098</u></p>	<p>The Executive notes the issues raised.</p> <p>Car Parking standards, including electric charging spaces, are set by National policy and the County Development Plan, with the objective of cater for the needs of a development while promoting sustainable travel. The number of electric cars, and consequently the number of charging points needed, is going to increase significantly during the life of the LAP.</p> <p>Recommendation No change to Draft Plan.</p>

3.6 Chapter 6 – Multifunctional Neighbourhood Centre and Employment

Issues	Sub. No.	Executive's Response & Recommendation
3.6.1 Section 6.5 Multifunctional Neighbourhood Centres		
i. Submissions request the following facilities for the local area to be sustainable to serve the growing population and ensure that residents do not have to travel by car for basic needs. <ul style="list-style-type: none"> • Substantial supermarket • Medical facility • Retail outlets • Café • Gym • Cinema • Swimming pool • Recreational facilities • Health and Wellness facilities • Beauty salon • Barber/hairdresser 	<u>B035</u> <u>B056</u> <u>B059</u> <u>B092</u> <u>B109</u> <u>B110</u> <u>B116</u> <u>B117</u>	<p>The Executive notes the issues raised.</p> <p>A key focus of the LAP is the delivery of a multifunctional neighbourhood centre in Kiltiernan Village which will play a vital role in providing accessible day-to-day retail, services, and community uses that can become the heart of the local area plan allowing the area and its community to flourish.</p> <p>The Land Use Objectives set out in SDF6 - 4 provide detailed guidance for a sustainable mix of uses in Kiltiernan Village. The exact details of location, type and mix of uses will be addressed through the development management process.</p> <p>Recommendation No change to Draft Plan.</p>

3.7 Chapter 7 – Biodiversity, Open Space and Recreation

Issues	Sub. No.	Executive's Response & Recommendation
3.7.1 Section 7.3.4 Landscape Character Assessment		
i. Submission requests that the rural character of Ballycorus, where farming is very important, should be respected.	<u>B123</u>	<p>The Executive notes the issues raised.</p> <p>The CDP includes policy objective GIB2: Landscape Character Assessment – “to continue to protect, manage and plan to conserve, maintain or enhance the distinctive characteristics of the County’s landscapes...”</p> <p>Ballycorus is identified as a Landscape Character Area and associated sensitivities/strategies for the area are set out in tabular form in Appendix 8 of the County Development Plan.</p> <p>Recommendation No change to Draft Plan.</p>
3.7.2 Section 7.3.5 Protected Views and Prospects		
i. Submission states that attention should be paid to protected views.	<u>B084</u>	<p>The Executive notes the issue raised.</p> <p>The Draft Local Area Plan has regard to protected views and prospects under the provisions of Section 7.3.5 'Protected Views and Prospects' and 'Objective GI2 – Views and Prospects', in Chapter 7.</p> <p>Consideration is accorded to the value of high amenity landscapes, views and prospects during the development management process whereby planning applications that have the potential to adversely impact upon landscapes attributed within the County Development Plan (2022 – 2028) with a High Amenity Zoning Objective - or upon Protected Views or Prospects - shall be accompanied by an assessment of the potential landscape and visual impacts of the proposed development, including photomontages – demonstrating that landscape impacts have been anticipated and avoided to a level consistent with the</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>sensitivity of the landscape (Refers to Section 8.4.5 Policy Objective GIB6 – Views and Prospects of the dlr County Development Plan 2022 - 2028).</p> <p>Recommendation No change to Draft Plan.</p>
3.7.3 Section 7.4.1 Green Infrastructure – Climate Action and Biodiversity Conservation		
<p>i. Issues raised in relation to trees and planting as follows:</p> <ul style="list-style-type: none"> Concerns raised around the removal of existing trees and hedgerows and impact of development on biodiversity. Request that trees along the Enniskerry Road between Kiltiernan and the Scalp be preserved. Notes tree removal along Enniskerry Road, particularly along the boundary of Shaldon Grange. Where trees are removed, they should be replaced with suitable native alternatives. New developments should incorporate native planting with all new planting monitored. Native trees and hedgerows to be retained and not replaced with non-native hedgerows such as the Portuguese Laurel planted along Glenamuck Road which does not support biodiversity A tree planting policy is required for the LAP. Planting of native trees and hedgerows Protection of remaining hedgerows as a priority. Hedgerows should be protected and have the same status as mature old trees. 	<p><u>B018</u> <u>B038</u> <u>B039</u> <u>B045</u> <u>B062</u> <u>B067</u> <u>B084</u> <u>B092</u> <u>B094</u> <u>B102</u> <u>B123</u></p>	<p>The Executive notes the issues raised.</p> <p>The overarching County Development Plan contains policy objectives recognising the important role of trees and hedgerows. Section 12.8.11 of the dlr County Development Plan 2022 – 2028 set out that the retention of existing planted site boundaries will be encouraged within new developments, particularly where it is considered that the existing boundary adds positively to the character/visual amenity of the area. The Draft Plan recognises the important role of hedgerows in the Kiltiernan Glenamuck area and includes objective G11 – Hedgerows.</p> <p>It is considered that the issue raised are adequately addressed in the County Development Plan and the Draft Local Area Plan. The parks Department have advised that non-native species are being suggested in recent preplanning meetings for scheme in the area.</p> <p>Recommendation No change to Draft Plan.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> Submission recommends that the planting of trees along road frontage not built out to the road mitigates for future climate change, cooling buildings and setting the building into the countryside. Requests better upkeep of estates including the planting of trees and hedge rows between Kilternan Wood and Sutton Field Considers that given the biodiversity crisis that remaining native hedgerows, ditches and trees should be retained and protected. 		
ii. Submission requests provision of a dog area in a park in Kilternan-Glenamuck preferably in 'pylon park'.	B018	<p>The Executive notes the issue raised.</p> <p>The provision of a dog area within any dlr park is an operational matter for the Parks Department and falls outside the remit of the Draft LAP. The Parks Department have advised that there may be scope to include one in Kilternan Park.</p> <p>Recommendation No change to Draft Plan.</p>
iii. Submission from Inland Fisheries Ireland welcomes recognition of provisions of dlr Biodiversity Action Plan 2021-2025 which focuses on the Fernhill to Bride's Glen ecological corridor which traverses the KGLAP lands from the future Jamestown Park through to the Dingle Glen pNHA.	B031	<p>The Executive notes the issues raised.</p> <p>Recommendation No change to Draft Plan.</p>
iv. Submission recommends that Objective G17 should include a 30m setback from adjoining and more sensitive zonings because the LAP area forms a transition to the Dublin and Wicklow mountains.	B082	<p>The Executive notes the issue raised.</p> <p>It is not considered appropriate or necessary to specify the width of any buffer zone between development sites and ecological sensitive sites as it may vary in different instances.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		Recommendation No change to Draft Plan.
v. Submission considers that dlr should have undertaken a bat survey of all new development areas particularly at edge of proposed built up area.	B082	<p>The Executive notes the issue raised.</p> <p>Bat surveys are usually undertaken at the Development Management stage when a proposal for development comes forward.</p> <p>Bats are addressed in the SEA Screening and are considered under KGLAP Objective G16 which states that "It is an objective that the design of lighting within the LAP area should seek to minimise light pollution and adverse effects on bat species."</p> <p>There are also related Objectives that support the landscape for bats along with other important species including GI7 which states that "It is an objective that where development sites adjoin an ecologically sensitive area adequate buffer areas shall be provided. In accordance with the County Development Plan ecological and hedgerow assessment shall be carried out for such developments,</p> <p>Furthermore, the SEA consultants have advised that it is noted that there are various measures defined in the higher-order CDP and LAP which provide an appropriate level of protection for of important ecology and hedgerows, including GI1, GI7 and KGLAP44 in the LAP, for example.</p> <p>The potential impact of development on bat species has been fully considered and assessed at the appropriate scale in the SEA for the LAP. This is clearly acknowledged in Section 7 of the SEA Environmental Report where the following is stated:</p> <p>'Development may generate an increase in the quantum of light transmitted to sensitive ecological receptors, resulting in increased</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>vulnerability and sensitivity of light-sensitive species (e.g., the Whiskered Bat, Daubenton's Bat).'</p> <p>Appropriate Plan-level mitigation has been developed and embedded/integrated into the LAP to ensure the protection of light-sensitive species, including bats (e.g., GI1, GI6, GI7, KGLAP45 etc.) Furthermore, a wide range of protective policies for the protection of important species is provided for in the higher-order CDP.</p> <p>Any planning application for a development proposal in this area would need to be supported by appropriate project-level ecological surveying, an Ecological Impact Assessment and ecological mitigation, as necessary.</p> <p>Recommendation No change to Draft Plan.</p>
vi. Submission considers that the LAP may wish to acknowledge Kilternan Cemetery Park, as extended, as part of the amenity/green infrastructure provision of the area as it includes walkways, trees, hedgerows etc that contribute to the biodiversity of the area.	<u>B090</u>	<p>The Executive notes the issue raised.</p> <p>It is not considered necessary to acknowledge Kilternan Cemetery Park, as extended, as part of the amenity/green infrastructure provision of the area noting that the majority of the facility falls outside the Draft LAP boundary.</p> <p>Recommendation No change to Draft Plan.</p>
vii. Submission considers that: <ul style="list-style-type: none"> the LAP boundary is being extended to allow for the identification of a wildlife corridor which has no regard to existing or future land uses in the area. the Draft LAP fails to optimise land use and landform in the area 	<u>B090</u> <u>B096</u> <u>B108</u>	<p>The Executive notes the issues raised.</p> <p>As set out in Policy KGLAP 47, Agricultural and High Amenity lands "It is policy to acknowledge the important protection role played by agricultural and high amenity lands both within and adjoining the Draft Plan lands. The agricultural and high amenity land use zoning objective provide for a transition area between the built up</p>

Issues	Sub. No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> the ecological areas, wildlife corridors, and green infrastructure identified on Draft KGLAP Figure 7.1, are excessive in extent, and would jeopardize the future development potential of lands currently subject to High Amenity and Agriculturally Land use zoning objectives. Request removal of text in GI3 – Wildlife Corridor. Fernhill to Bride's Glen Wildlife Corridor does not reflect existing land uses, zoning, and is not based on survey information. Concern that corridors are being carried through in a statutory Plan as they could constrain future development. Submission notes wording in BAP which states that "some of the areas within the wildlife corridors are indicative and will be subject to further survey. Some of these areas are identified as future development lands in the County Development Plan 2022-2028' and consider that they should not be included in Draft LAP. <p>Submissions request that the text relating to Objective GI3 – Wildlife Corridor and Figure 7.1 should be amended to as follows:</p> <p>Objective GI3 – Wildlife Corridor: It is an Objective to:</p> <ul style="list-style-type: none"> Allow the relevant wildlife corridors – Fernhill to Brides Glen corridor and Brides Glen corridor – as set out in the dlr County Biodiversity Action Plan 2021 – 2025 to 		<p>area of Kiltiernan- Glenamuck and the more sensitive rural upland areas".</p> <p>The Draft Plan further notes that the DHLGH recommended in their pre-draft submission that the Draft Plan retains the high amenity land use zoning for the entire Glenamuck valley area. It is considered that the Draft LAP policies respond to the landscape and landform in the area.</p> <p>The DLR Ecological network and wildlife corridors have been mapped by suitably qualified ecologists and aim to provide refuges and connectivity for biodiversity including protected habitats and species under the Wildlife Acts and the Habitats Regulations. The dlr wildlife corridors can include a variety of landscape features that form important corridors for wildlife including high amenity areas and open spaces which often connect fragmented EU Annex habitats. These wildlife corridors are not considered excessive in extent for KGLAP but reflect the existing important wildlife corridors that underpin the DLR Ecological Network as detailed in the DLR County Biodiversity Action Plan.</p> <p>In terms of planning and development, the identification of areas as a wildlife corridor does not preclude development of the future development lands identified in the County Development Plan 2022-2028 subject to assessment under the planning process and subject to any other legal obligations.</p> <p>The SEA consultants have advised that the inclusion of text in GI3 which states "Allow the relevant wildlife corridor – Fernhill to Brides Glen corridor and Brides Glen corridor - as set out in the dlr County Biodiversity Action Plan 2021 - 2025 to inform decision making within the DLAP area" is reasonable and appropriate given the wider plan and policy context and in the context of the</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>inform decision making within the KGLAP area.</p> <ul style="list-style-type: none"> Identify opportunities to enhance and restore the Fernhill to Brides Glen corridor and Bride's Glen corridor within the LAP lands, using best practice under the supervision of suitably competent professionals as deemed appropriate by the Planning Authority. 		<p>biodiversity emergency, the County Biodiversity Action Plan and the EU Nature Restoration Law.</p> <p>The retention of this text best supports the achievement of Biodiversity, Flora and Fauna SEOs defined under the SEA for the LAP.</p> <p>The text requires that the wildlife corridor informs the decision-making process. The Draft LAP does not preclude development at this corridor. It is noted that all development taking at or in proximity to this wildlife corridor will be subject to project-level ecological surveying and Ecological Impact Assessment. Appropriate ecological mitigation, enhancement and compensatory measures can be employed when designing and planning projects to avoid adverse effects on the sensitive features present along this corridor and any net loss to biodiversity.</p> <p>Recommendation No change to Draft Plan.</p>
<p>viii. Submission:</p> <ul style="list-style-type: none"> Raises concern that the biodiversity and wildlife corridor designations on Figure 7.1 of the LAP includes the lands associated with Kiltarnan Cemetery Park. Requests that the extent of the 'Brides Glen' wildlife corridor be amended on biodiversity maps in the LAP to exclude the southern portion of the Kiltarnan Cemetery Park extension lands and illustrated on Figure 3.7 of the submission. 	<p>B090</p>	<p>The Executive notes the issues raised.</p> <p>The DLR Ecological network and wildlife corridors have been mapped by suitably qualified ecologists and aim to provide refuges and connectivity for biodiversity including protected habitats and species under the Wildlife Acts and the Habitats Regulations. The dlr wildlife corridors can include a variety of landscape features that form important corridors for wildlife including high amenity areas and open spaces which often connect fragmented EU Annex habitats. These wildlife corridors are not considered excessive in extent for KGLAP but reflect the existing important wildlife corridors that underpin the DLR Ecological Network as detailed in the DLR County Biodiversity Action Plan.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>The biodiversity and wildlife corridors include a variety of different areas throughout the county. As set out in the dlr Biodiversity Action Plan "In terms of planning and development, some areas of our wildlife corridors form important habitats or contain important species, while other areas are of lower ecological value, but all areas will undergo assessment when considering development. Some of the areas within the wildlife corridors are indicative and will be subject to further survey. Some of these areas are identified as future development lands in the County Development Plan 2022-2028. Identification as a wildlife corridor does not preclude development of the future development lands identified in the County Development Plan 2022-2028 subject to assessment under the planning process and subject to any other legal obligations."</p> <p>There is no rationale for excluding Kiltiernan Cemetery Park from the already mapped corridors.</p> <p>Recommendation No change to Draft Plan.</p>
<p>ix. Submission recommends protection of the Loughlinstown River, riparian area and associated wetlands to protect these areas and to connect them to a future park amenity.</p>	<p>B102</p>	<p>The Executive notes the issue raised.</p> <p>Policy Objective GIB24: river and waterways of the dlr County Development Plan 2022 – 2-28 sets out that is a policy objective to maintain and protect the natural character and ecological value of the river and stream corridors in the County. The Draft LAP also contains objective GI8 relating to the Glenamuck River Riparian Corridor. It is recommended that this be amended to include the Loughlinstown River corridor.</p> <p>Recommendation Amend Objective GI8 (pg. 73) as follows: "Objective GI8 – Glenamuck River Riparian Corridors:</p>

Issues	Sub. No.	Executive's Response & Recommendation
		It is an objective to protect the riparian corridor along Glenamuck stream and the Loughlinstown River in line with the overarching objectives set out in the County Development Plan."
<p>x. Submission welcomes biodiversity policies and requests consideration for building-dependent wildlife such as red-listed bird species as follows:</p> <ul style="list-style-type: none"> Existing nest sites for building-dependent species such as swifts and house martins should be protected, as these endangered, red-listed species which are present but declining in Kiltiernan – Glenamuck, return annually to traditional nest sites. Mitigation should be provided if these nest sites cannot be protected. Swift bricks should be installed in new developments including extensions in accordance with best-practice guidance. Artificial nest cups for house martins may be installed instead of swift bricks were recommended by an ecologist. 	B119	<p>The Executive notes the issues raised.</p> <p>The Kiltiernan-Glenamuck LAP contains embedded mitigation for the prevention of disturbance to key species present within the Plan Area, such as KGLAP 43 and KGLAP 44, which encourages the incorporation of Biodiversity Net Gain Approach for development proposals and recognising the areas of local ecological importance within the Plan Area.</p> <p>Biodiversity Action 3.10 of the DLR Biodiversity Action Plan is to request the incorporation of swift nest boxes into new developments in dlr.</p> <p>All developments that have the potential to generate ecological impacts will be subject to appropriate project-level ecological surveying and Ecological Impact Assessment in accordance with the requirements of the higher-order CDP. Ecological mitigation and enhancement measures will be integrated into developments as necessary.</p> <p>Protection of existing nest sites for building-dependent species such as swifts and house martins and provision of biodiversity measures such as swift bricks are considered on a case-by-case basis via the Development Management process.</p> <p>Section 7.4.1.1 which relates to Fauna already notes the pine martin. It is recommended that it be amended to also reference the Swift.</p> <p>Recommendation Amend section 7.4.1.1 'Fauna' (pg.73) as follows:</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>"Bird species of conservation importance in the area including meadow pipit, <u>swift</u>, skylark, and raven, jay and buzzard are also present".</p>
<p>xi. Submission from DHLGH welcomes:</p> <ul style="list-style-type: none"> Provisions in the LAP to conserve biodiversity in the context of catering for large scale residential and other development which will take place over the lifespan of the plan and in particular: <ul style="list-style-type: none"> The objective G zoning 'To protect and improve high amenity area' of the Dingle Glen pNHA and the smaller wooded Glenamuck Valley glacio-fluvial channel to the west of it should result in the preservation of these ecologically rich areas. Inclusion of Objectives GI1- hedgerows, GI3 – maintenance of wildlife corridors and GI8 – protection of the Glenamuck River riparian corridor. While noting the Inclusion of Objective GI6 – Lighting, which states "It is an objective that the design of lighting within the LAP area should seek to minimise light pollution and adverse effects on bat species", submission considers that this objective should be expanded as follows, "including giving consideration to the installation of movement activated lighting to operate between the hours of 8PM and 6AM on greenways and footpaths through park and open space areas". 	<p><u>B124</u></p>	<p>The Executive note the issues raised and welcome the support for the provisions of the Draft LAP.</p> <p>In relation to the proposed amendment to policy GI6: Lighting, it is considered that the detail relating to movement activated lighting is overly detailed and is also a Council operational matter which is dealt with by the public lighting section. The Biodiversity Officer has also advised that there can be issues with activate lighting as other nocturnal species such as otters and badgers may activate the lighting which is not good for these species. Greenways, or any development, need to be assessed on a case-by-case basis in terms of lighting and the need for the lighting, also the impact not only on bats but also other important nocturnal species such as Otter, Badger, Hedgehog, nocturnal pollinators etc.</p> <p>Recommendation Replace the wildflower meadow photo on page 71 with a photo supporting native biodiversity.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> Submission recommends replacing the Glenamuck Manor photograph with one of an area or a feature supporting high biodiversity within the LAP area, such as the Bride's Glen/Shanganagh River or Glenamuck Stream. 		
3.7.4 Section 7.4.2.1 Play Facilities		
i. Submission objects to the inclusion of Chapel Hill playground in the LAP and considers it an advertisement for a private space.	<u>B047</u>	<p>The Executive notes the issue raised.</p> <p>Map 2.7 in the Draft LAP shows open spaces and playgrounds – existing, permitted and future within the LAP area. The LAP is blind to ownership and to whether the provision of any such facility is private or public. Playgrounds in new residential estates are likely overtime to be taken in charge and maintained by the Council.</p> <p>Recommendation No change to Draft Plan.</p>
3.7.5 Section 7.4.3 Green Infrastructure – Open Space and Recreation Strategy		
i. Submission: <ul style="list-style-type: none"> Raises concern regarding provision of parkland, greenways or walkways beneath pylons as irresponsible and considers land under pylons should be used for attenuation ponds. Considers that greenways and parks should not follow under the path of the pylons and power lines due to medical threat to those with medical devices such as pacemakers. 	<u>B038</u>	<p>The Executive notes the issue raised.</p> <p>While it is acknowledged that the space under pylons may be less attractive than other open space areas regard is had to the fact that the lands under same tend to be flat and open and they do offer possibilities for greenway routes and cycleways. The space may also be used for attenuation ponds although there are construction exclusion zones that must be taken into account in any construction under a powerline.</p> <p>The Parks Department have advised that there are very clear restrictions and rules about clear zones beneath and within a buffer distance of pylon corridors. This makes them conducive to open space which is the case along the 220KV corridor that cuts through the LAP area.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		Recommendation No change to Draft Plan.
ii. Submissions consider that: <ul style="list-style-type: none"> There is a need to provide parks and dedicated walking / cycling / jogging routes noting their importance for wellbeing. Provision of green space improves quality of life for everyone, and environment should not be lost in the pursuit of the built environment. Suggests that the plan lacks parks, sports and training facilities and that reliance on existing club infrastructure is not sustainable. 	B064 B084 B102	<p>The Executive notes the issues raised but would not concur that the Draft LAP lacks parks, sports and training facilities.</p> <p>The Draft LAP is proposing an additional phase to Kiltiernan Park and an active recreational facility at the former Bective lands. Future parks will allow provide for jogging/walking and cycling routes as will proposed permeability routes throughout the Draft LAP lands.</p> <p>Recommendation No change to Draft Plan.</p>
iii. Submission acknowledges the recognition of open space and recreation and requests that specific objectives are included to facilitate the expansion of Wayside Celtic's facilities as follows: <ul style="list-style-type: none"> Development of additional playing fields and training areas. Upgrade of existing facilities, including changing rooms and clubhouses. Enhanced access and connectivity within Jackson Park and to the surrounding areas. 	B072	<p>The Executive notes the issues raised.</p> <p>The Council are supportive of all sports clubs in the Country. Provisions in the Draft Plan including the delivery of the GDRS will aid access and connectivity within Jackson Park and to the surrounding areas including links to the new proposed park location. The Draft LAP includes for active recreational provision at the former Bective lands.</p> <p>Recommendation No change to Draft Plan.</p>
iv. Submission relates to a site to the north of the Draft LAP boundary: <ul style="list-style-type: none"> Requests for an objective to provide a football pitch to serve the growing population in the area. Notes that the site subject to the submission is described as being greenfield and is a prime location for a football pitch given its 	B075	<p>The Executive notes the issue raised.</p> <p>The site in question lies outside the boundary of the Draft LAP and is currently zoned objective B where open space is a use that is permitted in principle. It is noted that the draft LAP provides for active recreational facilities on the former Bective site.</p> <p>Recommendation</p>

Issues	Sub. No.	Executive's Response & Recommendation
proximity to existing sporting facilities, schools, church, proposed village centre and is service in terms of infrastructure, public transport, and utilities.		No change to Draft Plan.
<p>v. Submission considers that open space should be no less than 20% of site, half of which to be located centrally.</p> <p>Peripheral areas that do not have capacity for use by groups of 10 or more not to be considered in calculation of open space.</p>	B092	<p>The Executive notes the issue raised and would concur that quality of open space in addition to quantum is important.</p> <p>The County Development Plan 2022 – 2028 sets out in section 12.8.5 that "Fragmented open spaces within a development layout, which result specifically from the necessity to protect existing site features (for example a stand of mature trees) may not be included in the calculation of open space requirements, as they are necessary to ensure the protection of existing amenities." It further sets out that "Narrow tracts and corridors of open space, which are difficult to manage, will generally not be acceptable."</p> <p>For residential schemes table 12.8 of the County Plan sets out the minimum standards which range from 15% to 25% of site area.</p> <p>Recommendation No change to Draft Plan.</p>
<p>vi. Submissions recommend that the sports field behind the adult education centre on Ballybetagh Road should be used by the council to provide public facilities such as a park or public playing pitches.</p>	B100 B105	<p>The Executive notes the issues raised.</p> <p>The sports field behind the adult education centre on Ballybetagh Road field is not in the ownership of the Council.</p> <p>Recommendation No change to Draft Plan.</p>
<p>vii. Submission considers:</p> <ul style="list-style-type: none"> That they have accommodated the majority of the community gain in the Plan lands and that the provision of Kiltiernan Park phase 2 exceeds the open space requirements set out in the dlr Green Infrastructure Strategy. 	B108	<p>The Executive notes the issues raised and would not concur that the provision of Kiltiernan Park phase 2 would exceed any open space standards set out the dlr green Infrastructure Strategy which forms part of the County Development Plan 2022 – 2028.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> The Draft KGLAP background papers, particularly the Community Audit and Sustainable Neighbourhood Infrastructure Review, fail to recognise the open space already delivered in the area (i.e. Kiltiernan Park 3.5 ha) 		<p>The Community Audit and Sustainable Neighbourhood Infrastructure (SNI) background paper is focused on existing SNI facilities and while the definition of SNI, as set out in the County Development Plan 2022-2028, includes for leisure and recreation facilities, a 'park' is considered to fall under open space.</p> <p>The open space background paper acknowledges existing open space and Kiltiernan Park phase 1.</p> <p>Recommendation No change to Draft Plan.</p>

3.8 Chapter 8 – Heritage and Conservation

Issues	Sub. No.	Executive's Response & Recommendation
3.8.1 Section 8.3 Historical Context		
i. Submissions: <ul style="list-style-type: none"> Consider that the spelling of Kiltiernan with two letter I's is incorrect and should be spelt 'Kiltiernan'. Request for a single approach to the spelling of "Kiltiernan". 	<u>B003</u> <u>B038</u> <u>B039</u> <u>B050</u> <u>B053</u> <u>B057</u> <u>B060</u> <u>B070</u>	<p>The Executive notes the issue raised.</p> <p>The Kiltiernan spelling is based on the dlr 2011 publication "Streetnames and Placenames" developed in partnership with the Placenames Branch and its use on Tailte Eireann digital base mapping.</p> <p>It is acknowledged that placename spelling evolves over time and there is clear extensive local use of Kiltiernan as evidenced in signs in the locality, Eircode addresses, new housing developments, local businesses, the churches, schools, the cemetery and on Tailte Eireann Discovery Series mapping.</p> <p><i>The change of the Council use of the placename spelling falls outside the scope of the Local Area Plan process.</i></p> <p>Recommendation No change to Draft Plan.</p>
ii. Submissions raise concerns: <ul style="list-style-type: none"> Around the removal of existing granite walls to facilitate development. Requests that village/rural/granite character of the area is preserved and enhanced, and that original granite should be used in walls and developments. About the lack of consistency and reference to traditional local materials for boundary walls such as granite, poor quality of materials, and piecemeal nature of development in the area, and on Glenamuck Road. 	<u>B035</u> <u>B055</u> <u>B102</u> <u>B120</u>	<p>The Executive notes the issue raised.</p> <p>Consideration is accorded to the built character of local areas, and of the prevalence of materials in historical structures, during assessments of building proposals conducted through the development management process as guided by the County Development Plan policies. These considerations are further supported by objectives proposed within the Draft LAP.</p> <p>Recommendation No change to Draft Plan.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>iii. Submission:</p> <ul style="list-style-type: none"> • Raises concern where new development is located close to the road without appropriate planting / boundary treatments will have a negative impact on the visible heritage of the area. • Considers that developments positioned too close to a road with no bordering landscaping will impact the heritage feel of Kiltarnan and reduce existing biodiversity & air quality. 	B035	<p>The Executive notes the issue raised.</p> <p>Consideration is accorded to the built character of local areas, and of the landscape character, reviewed during assessments of building proposals conducted through the development management process as guided County Development Plan policies. These considerations are further supported by objectives proposed within the Heritage and Conservation in addition to the Biodiversity, Open Space and Recreation chapters of the Draft LAP.</p> <p>Recommendation No change to Draft Plan.</p>
3.8.2 Section 8.6 Protected Structures and Architectural Conservation Areas		
<p>i. Submission requests:</p> <ul style="list-style-type: none"> • Record of Protected Structures be updated at the time items are located rather than Council carrying out independent investigations once notified of potential items of interest. • Given the historic nature of the area and number of monuments already identified that those remaining should be preserved. 	B092	<p>The Executive notes the issue raised.</p> <p>Each Local Authority is obliged to compile and maintain a Record of Protected Structures (RPS) under the provisions of the Planning and Development Act 2000 (as amended).</p> <p>Protection and preservation of structures reflected within the current RPS are contained within the Dun Laoghaire Rathdown Development Plan 2022 - 2028 representing a varied cross section of the built heritage of the County. Additions can be made to the RPS utilising Section 55 of the Planning and Development Act 2000 (as amended).</p> <p>Recommendation No change to Draft Plan.</p>

3.9 Chapter 9 – Implementation and Monitoring

Issues	Sub. No.	Executive's Response & Recommendation
3.9.1 Section 9.4 Implementation		
<p>i. Implementation and Monitoring chapter should include:</p> <ul style="list-style-type: none"> • Chapter 3 Climate Action and Infrastructure in Table 9.1. • Monitoring and evaluation of "Healthy Place making" aspect of the Vision for the plan. • Monitoring of plan delivery during and at end of plan period using SMART objectives/indicators. • Health metrics in a "Monitoring and Evaluation Framework" for the plan. 	<u>B044</u>	<p>The Executive notes the issues raised.</p> <p>The policies and objectives set out in chapter 3 Climate Action and Infrastructure do not readily lend themselves to phasing as they are overarching policies and objectives relating to items such as Sustainable Urban Drainage Systems, flood risk assessment, water framework directive etc. It is therefore not recommended that they be added to chapter 9. Monitoring and evaluation of the Plan will take place over the lifetime of the Plan and the SEA monitoring will include an element which addresses overall healthy place making.</p> <p>The Sea consultants have also advised that Climate Change related Strategic Environmental Objectives have been defined in the SEA Environmental Report, including the following:</p> <ul style="list-style-type: none"> • CF2 - Actively support the delivery of all national climate policy as appropriate to the Plan area with the prioritisation and acceleration of evidence-based measures. • CF4 - Promote the carrying out of climate resilient development. <p>Suitable indicators and targets have been defined for these SEOs.</p> <p>SEO's have also been defined for Population and Human Health, including the following:</p> <ul style="list-style-type: none"> • PHH1 - Avoid or minimise impacts to population and human health.

Issues	Sub. No.	Executive's Response & Recommendation
		<p>Number of spatial concentrations of health problems arising from environmental factors as a result of implementing the Plan has been defined as an indicator for SEO PHH1.</p> <p>The Sea consultants have also suggested that SEO PHH1 be changed to the following so as to track progress of the positive environmental effects of healthy place-making policy:</p> <p>Avoid or minimise impacts to population and human health and seek opportunities to improve human health and well-being through healthy place-making.</p> <p>Recommendation No change to Draft Plan.</p>
<p>ii. Submission suggests that building work is staggered, limiting the amount of development sites under construction at the same time.</p>	<p>B066</p>	<p>The Executive notes the issue raised.</p> <p>The overall cycle of development and market conditions tend to result in development coming forward at different times. Having regard to the fact that development is underway in the area and that required infrastructure is also progressing it is not considered appropriate to stagger development in the manner suggested.</p> <p>Recommendation No change to Draft Plan.</p>
<p>iii. Submission requests that the LAP includes a specific implementation mechanism for newly incorporated lands to ensure that they are not disadvantaged by their late inclusion in the LAP ensuring that the lands can align with planned infrastructure, public transport upgrades and essential services</p>	<p>B075</p>	<p>The Executive notes the issue raised.</p> <p>It is not proposed to amend the Draft LAP to include any additional lands and therefore a specific implementation mechanism for newly incorporated lands is not required.</p> <p>Recommendation No change to Draft Plan.</p>

Issues	Sub. No.	Executive's Response & Recommendation
iv. Submission requests phasing flexibility noting that development within the area is no longer dependant on the GDRS. v. Submission suggests that development should be phased in the LAP because of lack of public transport and schools, impact on national roads and absence of timeline in the LAP for the delivery of the GDRS	<u>B075</u> <u>B082</u>	<p>The Executive notes the issue raised.</p> <p>The GDRS is on site with delivery progressing. Therefore, as set out in chapter 9 the previous phasing requirements which linked provision of residential units to delivery of the road scheme is no longer required.</p> <p>Recommendation No change to Draft Plan.</p>
vi. Submission welcomes the removal of phasing restrictions in relation to the progression of the Glenamuck District Distributor Road.	<u>B103</u>	<p>The Executive notes the issue raised.</p> <p>Recommendation No change to Draft Plan.</p>

3.10 Appendix 1 – Strategic Flood Risk Assessment (SFRA)

Issues	Sub. No.	Executive's Response & Recommendation
3.10.1 Section 1 Introduction		
i. Submission from OPW welcomes acknowledgment of the Guidelines and preparation of a Strategic Flood Risk Assessment (SFRA).	B086	<p>The Executive notes and welcomes the commentary.</p> <p>Recommendation No change to Draft Plan.</p>
3.10.2 Section 1.8 Flood Risk Management – Policy Response		
<p>i. Submission from OPW accepts that land use zoning has been determined by the County Development Plan and notes:</p> <ul style="list-style-type: none"> that Section 1.8 of the SFRA relating to vulnerable development within flood zone A or B requiring same to be located in a less vulnerable area. that there are undeveloped lands that are within Flood Zones A and B which are zoned Objective A which is considered to be a highly vulnerable land use zoning objective. 	B086	<p>The Executive notes and welcomes the commentary.</p> <p>As noted at the County Development Plan review, lands should not be rezoned based solely on current flood extents as this will exclude these lands from anything other than water compatible development for the lifetime of the plan. The Flood Policies within the CDP, Appendix 15 SFRA and Section 1.8 of the draft KGLAP Flood Risk Management allow for applications to be assessed based on the most up to date flood data available, including the results of detailed modelling in Site Specific Flood Risk assessments. It also allows applications adjacent to watercourses, in areas that have not been previously mapped via CFRAMS or NIFM, to be appropriately assessed following detailed local catchment modelling.</p> <p>Recommendation No change to Draft Plan.</p>
ii. Submission from OPW recommends that reference to SuDS in Section 15.8 of the Draft Local Transport Plan (LTP) is referenced in the SFRA.	B086	<p>The Executive notes and welcomes the commentary.</p> <p>Recommendation Insert the following text to the end of Section 1.8, ix Sustainable Urban Drainage Systems, paragraph 6 of the SFRA (There is considerable opportunity...) (pg. 10)</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<u>"Further details of SuDS requirements in the context of roads and public realm are also detailed in Section 15.8 of the Draft Local Transport Plan."</u>

3.11 Appendix 2 – Statutory Planning Context

Issues	Sub. No.	Executive's Response & Recommendation
i. Submission from Transport Infrastructure Ireland notes the inclusion of TII (2023) National Roads 2040 in Appendix 2, however, the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012) does not appear to have been listed and notes that TII (2023) National Roads 2040" is not a statutory document.	<u>B017</u>	<p>The Executive notes and welcomes the commentary.</p> <p>Recommendation Add the following to Appendix 2 (pg. 1): Add:</p> <p><u>DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012)</u> to Appendix 2 (pg.1) of the Draft KGLAP.</p>

3.12 Draft Local Transport Plan (LTP)

Issues	Sub. No.	Executive's Response & Recommendation
i. Submission from the OPW welcomes the SuDS reference in Section 15.8 of the Draft LTP.	<u>B086</u>	<p>The executive notes the issue raised.</p> <p>Recommendation No change to Draft Plan.</p>

3.13 Other Issues Raised

Issues	Sub. No.	Executive's Response & Recommendation
3.13.1 Local Area Plan Boundary		
<p>i. Submissions:</p> <ul style="list-style-type: none"> • Suggest that a clear rationale for the LAP extension has not been provided but considers that it is to provide improved transport connections to the rugby playing facilities on Ballycorus Road and that given the extended LAP boundary that Kiltiernan Cemetery Park (existing and extended) be referenced in the LAP as an important social and community amenity in the area. • Welcome the extension of the draft LAP boundary to the east to the pNHA of Dingle Glen, the proposed new parklands, walking and nature corridors. • Considers that the boundary of the LAP should have gone up to the county boundary to include land protection and green corridors. • Request to extend boundary to the northwest along the Enniskerry Road to provide adequate land within the LAP boundary for residential development and recreational facilities. • Consider that expanding the LAP boundary to the northwest would allow for continued growth of Kiltiernan and Enniskerry which will be able to facilitate higher populations on completion of the GDRS. • Consider that a proposed extension of the LAP boundary would allow for the delivery of 	<p><u>B038</u> <u>B039</u> <u>B075</u> <u>B090</u> <u>B106</u> <u>B108</u></p>	<p>The Executive notes the issues raised.</p> <p>The rationale for the extension to the LAP boundary is not to provide improved transport connections to the rugby playing facilities on Ballycorus Road but was to ensure adequate protection to the ecologically sensitive pNHA of Dingle Glen and to also bring in Dixon Lane into the Draft LAP area so as to allow objectives to improve permeability from Ballycorus Road through to the Glenamuck Road in line with the ABTA objectives.</p> <p>The rationale for this extension was acknowledged and welcomed by the Office of the Planning Regulator in their submission (see Part 2, section 2.1 above).</p> <p>Neither the proposed park nor the school site are located in the expanded boundary area. Both sites fell within the boundary of the 2013 Local Area Plan.</p> <p>Recommendation No change to Draft Plan.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>new and affordable homes and community services in accordance with the NPF and the RSES.</p> <ul style="list-style-type: none"> Boundary should be extended to include a 9.6 ha landholding, located at Kiltiernan Parish West (KPW), and to rezone the lands to Objective A, residential as this would provide much needed opportunity for additional housing. Express disappointment that the LAP boundary was extended to allow for identification of an excessively sized school site, to provide for a park and the identification of a wildlife corridor with no regard to existing or future lands uses and with no new residential lands included in the Draft Plan. 		
3.13.2 Land Use Zoning		
<p>i. Various submissions have been made which request that the boundary of the Draft LAP be extended to bring in additional lands.</p> <p>Some submissions have requested that the additional lands be rezoned from objective B - To protect and improve rural amenity and to provide for the development of agriculture. to objective A - To provide residential development and improve residential amenity while protecting the existing residential amenities and/or objective F - To preserve and provide for open space with ancillary active recreational amenities. The changes are to facilitate residential and recreational development.</p>	<p><u>B075</u> <u>B091</u> <u>B096</u> <u>B106</u></p>	<p>The Executive notes the issues raised.</p> <p>A number of submissions on the Draft LAP have requested that the boundary of the LAP be widened to take in additional lands and/or have requested a rezoning of lands so as to facilitate housing developments. Some submissions have argued that they are not seeking a rezoning although arguments are put forward supporting same. Some are seeking designation as a strategic land reserve. Detailed arguments are put forward regarding the need for housing. These sites have been visited as part of the plan making process.</p> <p>In relation to recreational use it is noted that open space is permitted in principle in the "B" land use zoning objective meaning that applicants can come forward for recreational projects outside the LAP boundary.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>Some submissions request that lands outside the Draft LAP boundary be designated as a Strategic Land Reserve.</p> <p>A number of submissions put forward the argument that should additional rezonings be advanced in the Draft LAP a variation to the County Development Plan would be required to ensure consistency.</p> <p>Some submissions while not seeking a rezoning in the Local Area Plan are nonetheless referring to future development on lands not currently zoned for residential development.</p> <p>Sites put forward include lands to the north, northwest, west, and east of the Draft LAP lands.</p> <p>The majority of the lands put forward for rezoning and/or inclusion within the LAP boundary are currently subject to the "B" land use zoning objective – 'To protect and improve rural amenity and to provide for the development of agriculture'.</p> <p>Submissions raise the following issues:</p> <ul style="list-style-type: none"> • Need to consider the long-term development of fully serviced B zoned lands to capitalise on investment and also to integrate land use and transport policy. • Draft LAP should take long term view for next 6 – 10 years and should provide for 		<p>While the housing crisis is acknowledged, in accordance with the requirement in section 19 (2) of the Planning and Development Act 2000 whereby a Local Area Plan is required to be consistent with the core strategy and having regard to policy and objective of the Section 28 Development Plan Guidelines for Planning Authorities, which sets out that land use zoning should principally be undertaken as part of the Development Plan process in tandem with the preparation of core settlement strategies it is considered that long term development of additional lands outside the boundary of the Draft LAP is best addressed in the County Development Plan review or variation process.</p> <p>It is noted that on the 8th of April 2025, the Government approved the Revised National Planning Framework (NPF) which, subject to the approval of both Houses of the Oireachtas, signals the conclusion of the NPF revision process which has been underway since June 2023. In a press release issued with the publication the Minister stated that "Having regard to the need to ensure that current local authority development plans can be updated as quickly as possible to reflect the update housing requirements, I also intend, following completion of the NPF Revision process, to provide further clear direction and guidance relating to housing requirements and I fully expect local authorities to translate this revised NPF into their own local plans as speedily as possible."</p> <p>National Policy Objective 11 of the revised NPF is also noted. This states that "Planned growth at a settlement level shall be determined at Development Plan making stage and addressed within the objectives of the plan".</p> <p>It is anticipated that the Planning Authority will be re-examining the existing core strategy over coming months, and it is during any variation process that additional lands for housing will be</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>future development potential for residential development.</p> <ul style="list-style-type: none"> • Ongoing and anticipated population growth will put pressure on existing residential zoned lands. • Reduced capacity of residentially zoned lands due to overhead powerlines. • Lands zoned within the plan area are already being developed, or have planning permission for development. • National Planning Framework review requires more housing. • Proximity of the lands to schools and services. • Development of lands would facilitate additional recreational amenities. • Proximity of the lands to the GDRS, improved accessibility, BusConnects / improved frequency of public transport and improved access to the Luas. • Lands adjoin water and road infrastructure. • While lands may not be suitable for rezoning now, the boundary extension would future proof the plan by the designation of subject lands as a long-term development reserve. • Kilternan – Glenamuck is within the Dublin Metropolitan Area. • Ensures that adequate lands are set aside for residential development in the event of the County Development Plan review to take account of recent census data. • Exclusion of the lands from the LAP contradicts the plan's infrastructure phasing approach. 		<p>brought forward in accordance with the sequential test for residential zoning in settlements as set out in the Section 28 Development Plan – Guidelines for Planning Authorities.</p> <p>Recommendation No change to Draft Plan.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> • Considers that the housing crisis is now a housing emergency, and that insufficient land is zoned to meet the Revised National Planning Framework targets of 303,000 new homes by 2030, approximately 50,00 per annum which is double that provided for under the NPF 2018. • Arbitrary cap on quantum of zoned lands including additional provision must be adjusted in the LAP to ensure that demand for new housing stock is met and even exceeded even if it were considered necessary to restart the Draft LAP process to have regard to the new NPF targets. • LAP must take account of the revised planning. • Plan-led approach to planning would result in the requirement for a Variation to the CDP if the LAP were to include additional zonings for the plans to be materially consistent. • Considers that the Background Paper – Demographic and Housing Analysis that accompanies the draft LAP is based on already outdated statistics • Considers that rezoning of lands is a logical 'sequential step' in the development of Kiltiernan. • Request additional site development frameworks. • Request objective to develop a football pitch on lands to northwest of LAP. • Requests that lands to the northwest of the plan boundary have a site development framework. Reference is made to the 		

Issues	Sub. No.	Executive's Response & Recommendation
integration of a proposed master plan into the LAP.		
3.13.3 Miscellaneous Issues		
i. Submissions request increased Garda presence in the area and raise concerns around crime.	<u>B039</u> <u>B050</u> <u>B053</u> <u>B054</u> <u>B067</u>	<p>The Executive notes the issue raised.</p> <p>Policing is a matter for An Garda Síochána and falls outside the remit of the LAP.</p> <p>Recommendation No change to Draft Plan.</p>
ii. Issues raised around littering and the maintenance of public spaces with requests for: <ul style="list-style-type: none"> • additional bins • more frequent maintenance • efforts to curb dog fouling • Improved planting / public realm, including around the Golden Ball Pub • Request for improvements to visual appearance, amenity and maintenance/ cleaning of area between Bishop's Gate and the Circle K. • Observation that "white apartment block next to the Golden Ball" is not in keeping with the aesthetics of the area and grass on green area is overgrown and unsightly. 	<u>B050</u> <u>B053</u> <u>B054</u> <u>B064</u> <u>B069</u> <u>B070</u> <u>B083</u>	<p>The Executive notes the issues raised.</p> <p>These are operational matters that fall outside the remit of the LAP.</p> <p>Recommendation No change to Draft Plan.</p>
iii. There is a need to switch on street lighting within new developments.	<u>B064</u>	<p>The Executive notes the issue raised.</p> <p>This is an operational matter that falls outside the remit of the LAP.</p> <p>Recommendation No change to Draft Plan.</p>
iv. While generally supportive of development in the area, the submission states that it has been miserable to live in area due to:	<u>B066</u>	The Executive notes the issues raised.

Issues	Sub. No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> excessive levels of construction works over the past three years. Travel delays Lack of water supply and power cuts Noise and dirt. 		<p>It is acknowledged that the area is undergoing significant development and construction works can lead to short term issues.</p> <p>Recommendation No change to Draft Plan.</p>
v. Submission contends that the privacy, security and residential visual amenity of dwellings in Kilternan Wood and Kilternan Close is diminished because their private open spaces have not been provided with screening and can be viewed from the Enniskerry Road.	<u>B083</u>	<p>The Executive notes the issues raised.</p> <p>This is an enforcement issue that falls outside the remit of the LAP.</p> <p>Recommendation No change to Draft Plan.</p>
vi. Submission requests that the visual amenity and maintenance of the general area at the entry point to Kiltiernan Village, which is identified as an emerging neighbourhood centre in the LAP should be improved to a standard similar to Foxrock, Cabinteely and Stepaside.	<u>B083</u>	<p>The Executive note the issues raised.</p> <p>The development of the emerging neighbourhood centre will involve urban realm improvements which will alter the existing visual amenity.</p> <p>Recommendation No change to Draft Plan.</p>
vii. Submission asserts that the permitted planting along the boundary of Kilternan Wood on Enniskerry Road, which was to be consistent with that outside Bishops Gate has not been carried out, and that this noncompliance goes unchecked.	<u>B083</u>	<p>The Executive notes the issues raised.</p> <p>This is an enforcement issue that falls outside the remit of the LAP.</p> <p>Recommendation No change to Draft Plan.</p>
viii. Submission recommends that the aims and objectives of the LAP be enforced by allocation of Council staff to liaise with developers/contractors to protect and conserve remaining built and living heritage	<u>B102</u>	<p>The Executive notes the issues raised.</p> <p>Staffing and allocation of resources in an operational issue that falls outside the remit of the LAP.</p> <p>Recommendation No change to Draft Plan.</p>

Part 4: Appendices to Chief Executive's Report

4.1 Appendix 1 – Chief Executive's Errata to the Draft Plan

Chapter/section	Page No.	Errata
Table of contents	2	Ch. 6. Remove letter 's' from Centres
Preamble/ Executive Summary	3	Ref. for Ch 7: Remove 'Natural Heritage'. Title should read Biodiversity, Open Space and Recreation.
	3	Outline of Ch. 1: Remove 'and Context'. Title should read Chapter 1 Introduction.
	3	Outline of Ch. 2: Capitalise 'design' on line 4 of paragraph to refer to Urban Design Strategy.
	3	Outline of Ch. 3: Title should read 'Chapter 3 Climate Action and Infrastructure.'
	3	Outline of Ch. 4: Replace Place with Homes. Title should read Chapter 4 People and Homes.
	3	Outline of Ch. 7: Remove 'Natural Heritage'. Title should read Biodiversity, Open Space and Recreation.
Chapter 1 Introduction		
1.6.2	11	Last line: Chapters should be spelt with a lower-case c. 'various chapters of this Draft LAP.'
1.8	14	S1.8 Insert full stop after 2 bullet points. After Census. and after area.
1.8	14	Omit asterisk after area* and before * and associated paragraph to a foot note.
Chapter 2 Urban Design Framework and Site Development Frameworks		
2.7.1	24	Re.: Movement Objectives – remove 'Provide active building frontage along Kiltiernan Road which will create a sense of identity and place.'
Chapter 4 People and Homes		
4.2.3.3 i.	45	Replace numeric with spelt 'two' to read: '..boundary are a further 2 two primary schools..'
4.3.4	48	Amend title for image of Glenamuck Cottages by removing Enniskerry Road.
4.3.4	48	Amend Table 4.1 to correct % split of apartments / houses under Q3 2024. Replace 58 with 55.
4.3.6.4	50	Final paragraph. Remove reference to Objective H3 and replace with Objective H2 regarding Communal Facilities. Also replace reference to Objective H3 on last line and correct line references with 'H1 and H2 below.'
Chapter 6 Multifunctional Neighbourhood Centre and Employment		
6.5.1	68	Policy KGLAP 41: first line remove 'a' from It is a policy to
6.6.1	68	Adjust font of Objective E4 from Bold to Normal.
Chapter 7 Biodiversity, Open Space and Recreation		
7.2	71	Last line of paragraph: insert space between smaller and similar. Add an 's' to tree on the continuing first line of this paragraph to read 'removal of trees'.
7.3.2	71	Correct acronym from 'HCLA' to 'HLCA' for Historic Landscape Character Assessment' on the section title and lines 2, 5, 7, and 10 of the paragraph.

Chapter/section	Page No.	Errata
	72	First line – replace numeric 8 with 'eight' nodes.
	72	Correct acronym from 'HCLA' to ' HLCA ' for Historic Landscape Character Assessment' on line 4 and 10 of the paragraph.
7.3.3	72	Correct acronym from 'HCLA' to ' HLCA ' for Historic Landscape Character Assessment' on line 3 of this paragraph.
7.4.1	73	Objective G14 insert a letter 'a' to read line three of the paragraph as 'the supervision of a suitably competent professional...'
7.4.1	73	Objective G18 – Delete 'Please see' at bottom of objective and bring the line 'Please see Chapter 3 for policies and objectives on Nature Based d Solutions' within the coloured box. Also correct spelling of Based with a ' d '.
7.4.3	74	Add " Indicative " before "linkages between open spaces"
Chapter 8 Heritage and Conservation		
8.6.1	81	Middle paragraph, line three, remove water- to leave 'water pump and'.
Chapter 9 Implementation and Monitoring		
Table 9.1	86	Change reference to Permeability Objectives P1 and P2 to PRM1 and PRM 2.

4.2 Appendix 2 – Acronyms

AA:	Appropriate Assessment	ECFRAM:	Eastern Catchment Flood Risk Assessment and Management Plan
ABP:	An Bord Pleanála	EHO:	Environmental Health Officer
ABTA:	Area Based Transport Assessment	EMRA:	Eastern and Midlands Regional Assembly
ACA:	Architectural Conservation Area	EPA:	Environmental Protection Agency
BH:	Building Height	ER:	Environmental Report
BS:	British Standard	ESB:	Electricity Supply Board
BTR:	Build-to-rent	EU:	European Union
CAP:	Climate Action Plan	EV:	Electric Vehicle
CBA	Cost Benefit Analysis	FOI:	Freedom of Information
CBC:	Core Bus Corridor	FRA:	Flood Risk Assessment
CCCAP:	Community, Cultural and Civic Action Plan	FRMP:	Flood Risk Management Plan
CDP:	County Development Plan	FRS	Flood Relief Scheme
CE:	Chief Executive	GDA:	Greater Dublin Area
CFRAM:	Catchment Flood Risk Assessment and Management	GHG:	Greenhouse Gas
CMH:	Central Mental Hospital	GI:	Green Infrastructure
CMP:	Construction Management Plan	GPS:	Global Positioning System
CSO:	Central Statistics Office	GSI	Geological Survey of Ireland
DC:	District Centre	GW:	Gigawatt
DCC:	Dublin City Council	HLCA	Historic Landscape Character Assessment
DEBP:	Dublin Eastern Bypass	HSE:	Health Service Executive
KGLAP	Kiltiernan-Glenamuck Local Area Plan	IGB	Irish Glass Bottle
DLR:	Dún Laoghaire-Rathdown County Council	KDA	Key Development Area
DM:	Dom Marmion	LAP:	Local Area Plan
DMURS:	Design Manual for Urban Roads and Streets	LDA	Land Development Agency
DoE	Department of Education	LEV:	Low Emission Vehicle
DoHLGH:	Department of Housing, Local Government and Heritage	LTP:	Local Transport Plan
ECCE:	Early Childhood Care Education	MA:	Material Amendment
		MASP:	Metropolitan Area Strategic Plan
		MFF:	Motion from the Floor

MTC:	Major Town Centre	SFRA:	Strategic Flood Risk Assessment
NC:	Neighbourhood Centre	SHD:	Strategic Housing Development
NDP:	National Development Plan	SI:	Statutory Instrument
(p)NHA:	(proposed) Natural Heritage Area	SLO:	Specific Local Objective
NIFM:	National Indicative Fluvial Mapping	SNI:	Sustainable Neighbourhood Infrastructure
NPF:	National Planning Framework	SPA:	Special Protection Area
NPO:	National Policy Objective	SPPR:	Specific Planning Policy Requirement
NPPF:	National Planning Policy Framework (England)	SSFRA:	Site Specific Flood Risk Assessment
NBS:	Nature Based Solutions	SuDS:	Sustainable Drainage Systems
NSO:	National Strategic Outcome	SWOC:	Strengths, Weaknesses, Opportunities and Constraints
NTA:	National Transport Authority	TII:	Transport Infrastructure Ireland
NZEB:	Nearly Zero Energy Building	UCD:	University College Dublin
OMC:	Owners Management Company	UE:	Uisce Eireann
OPR:	Office of the Planning Regulator	UFP:	Urban Framework Plan
OPW:	Office of Public Works	UK:	United Kingdom
OSC:	Old Shopping Centre	UN:	United Nations
PA:	Planning Authority	URDF:	Urban Regeneration and Development Fund
PDA:	Planning and Development Act	UV:	Ultraviolet
PFRA:	Preliminary Flood Risk Assessment	WHO:	World Health Organisation
PLC:	Private Limited Company		
PRS:	Private Rental Sector		
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		
SDZ:	Strategic Development Zone		
SEA:	Strategic Environmental Assessment		
SEN:	Special Education Need		

4.3 Appendix 3 - Legislative Background

Planning and Development Act 2000 (as amended)

Section 20 Consultation and adoption of local area plans:

20.— (1) A planning authority shall take whatever steps it considers necessary to consult the Minister, the Office of the Planning Regulator and the public before preparing, amending or revoking a local area plan including consultations with any local residents, public sector agencies, non-governmental agencies, local community groups and commercial and business interests within the area.

(1A) The Minister or the Office of the Planning Regulator may, in relation to a local area plan, make such recommendations as the Minister or that Office, as the case may be, considers appropriate.

(2) A planning authority shall consult údarás na Gaeltachta before making, amending or revoking a local area plan under subsection (3) for an area which includes a Gaeltacht area.

(3) (a) The planning authority shall, as soon as may be after consideration of any matters arising out of consultations under subsections (1) or (2) but before making, amending or revoking a local area plan—

- send notice of the proposal to make, amend or revoke a local area F149[plan to the Minister, F150[the Office of the Planning Regulator,] the Board] and to the prescribed authorities (and, where applicable, it shall enclose a copy of the proposed plan or amended plan),
- publish a notice of the proposal in one or more newspapers circulating in its area.

(b) A notice under paragraph (a) shall state—

- (i) that the planning authority proposes to make, amend or revoke a local area plan,
- (ii) that a copy of the proposal to make, amend or revoke the local area plan and (where appropriate) the proposed local area plan, or proposed amended plan, may be inspected at such place or places as are specified in the notice during such period as may be so stated (being a period of not less than 6 weeks),
- (iii) that submissions or observations in respect of the proposal made to the planning authority during such period will be taken into consideration in deciding upon the proposal.
- (iv) that children, or groups or associations representing the interests of children, are entitled to make submissions or observations under subparagraph (iii).

(c) (i) Not later than 12 weeks after giving notice under paragraph (b), the Chief Executive of a planning authority shall prepare a report on any submissions or observations received pursuant to a notice under that paragraph and shall submit the report to the members of the planning authority for their consideration.

(ia) A chief executive's report prepared for the purposes of subparagraph (i) shall be published on the website of the planning authority concerned as soon as practicable following submission to the members of the authority under subparagraph (i).

(ii) A report under subparagraph (i) shall—

- I. list the persons who made submissions or observations,
- II. provide a summary of—

- A. the recommendations, submissions and observations made by the Minister, where the notice under paragraph (a) of subsection (2) was sent before the establishment of the Office of the Planning Regulator,
 - B. the recommendations, submissions and observations made by the Office of the Planning Regulator, and
 - C. the submissions and observations made by any other persons, in relation to the draft local area plan in accordance with this section,
- III. contain the opinion of the chief executive] in relation to the issues raised, and his or her recommendations in relation to the proposed local area plan, amendment to a local area plan or revocation of a local area plan, as the case may be, taking account of the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.
- IV.
- (cc) In the case of each planning authority within the GDA, a report under subparagraph (c)(i) shall summarise the issues raised and the recommendations made by the DTA in a report prepared in accordance with section 31E and outline the recommendations of the chief executive in relation to the manner in which those issues and recommendations should be addressed in the proposed local area plan.]
- (d) (i) The members of a planning authority shall consider the proposal to make, amend or revoke a local area plan and the report of the chief executive under paragraph (c).
- (ii) Following consideration of the manager's report under subparagraph (i), the local area plan shall be deemed to be made, amended or revoked, as appropriate, in accordance with the recommendations of the Chief Executive as set out in his or her report, 6 weeks after the furnishing of the report to all the members of the authority, unless the planning authority, by resolution—

- I. subject to paragraphs (e) to (r), decides to make or amend the plan otherwise than as recommended in the chief executive's report, or
- II. decides not to make, amend or revoke, as the case may be, the plan.

(e) Where, following consideration of the [chief executive's report], it appears to the members of the authority that the draft local area plan should be altered, and the proposed alteration would, if made be a material alteration of the draft local area plan concerned, subject to paragraphs (f) and (j), the planning authority shall, not later than 3 weeks after the passing of a resolution under paragraph (d)(ii) (inserted by section 9 of the Act of 2002), publish notice of the proposed material alteration in one or more newspapers circulating in its area, and send notice of the proposed material alteration to the Minister, F150[the Office of the Planning Regulator,] the Board and the prescribed authorities (enclosing where the authority considers it appropriate a copy of the proposed material alteration).

(f) The planning authority shall determine if a strategic environmental assessment or an appropriate assessment or both such assessments, as the case may be, is or are required to be carried out as respects one or more than one proposed material alteration of the draft local area plan.

(g) The Chief Executive shall, not later than 2 weeks after a determination under paragraph (f) specify such period as he or she considers necessary following the passing of a resolution under paragraph (d)(ii) as being required to facilitate an assessment referred to in paragraph (f).

(h) The planning authority shall publish notice of the proposed material alteration, and where appropriate in the circumstances, the making of a determination that an assessment referred to in paragraph (f) is required, in at least one newspaper circulating in its area.

(i) The planning authority shall cause an assessment referred to in paragraph (f) to be carried out of the proposed alteration of the local area plan within the period specified by the Chief Executive.

(j) A notice under paragraph (e) or (h) as the case may be, shall state that—

- i. a copy of the proposed material alteration of the draft local area plan may be inspected at a stated place and at stated times during a stated period of not less than 4 weeks (and the copy shall be kept available for inspection accordingly), and
- ii. written submissions or observations with respect to the proposed material alteration of the draft local area plan may be made to the planning authority within the stated period and shall be taken into consideration before the making of any material alteration.

(ja) (i) Written submissions or observations received by a planning authority under this subsection shall, subject to subparagraph (ii), be published on the website of the authority within 10 working days of its receipt by that authority.

(ii) Publication in accordance with subparagraph (i)—

- I. does not apply where the planning authority is of the opinion that the submission or observation is vexatious, libellous or contains 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,
- II. does not apply where the planning authority has sought and receives, either before or after the period of 10 working days referred to in subparagraph (i), legal advice to the effect that it should not publish under that subparagraph or should cease to so publish, as the case may be, the submission or observation concerned,

- III. does not apply to the extent that the local authority has sought and received, either before or after the period of 10 working days referred to in subparagraph (i), legal advice that part of the submission or observation concerned should not be published on the website of the planning authority or should cease to be so published, as the case may be, or
- IV. does not apply where the submission or observation relates to matters prescribed by the Minister for the purpose of this provision or does not apply to the extent that so much of the submission or observation relates to matters prescribed by the Minister.

(k) Not later than 8 weeks after publishing a notice under paragraph (e) or (h) as the case may be, or such period as may be specified by the Chief Executive under paragraph (g), the Chief Executive shall prepare a report on any submissions or observations received pursuant to a notice under that paragraph and submit the report to the members of the authority for their consideration.

(ka) A chief executive's report prepared for the purposes of paragraph (k) shall be published on the website of the planning authority concerned as soon as practicable following submission to the members of the authority under paragraph (k).]

(l) A report under paragraph (k) shall—

- (i) list the persons who made submissions or observations under paragraph (j)(ii),
- (ii) provide a summary of—
 - I. the recommendations, submissions and observations made by the Minister, where the notice under paragraph (a) of subsection (2) was sent before the establishment of the Office of the Planning Regulator,
 - II. the recommendations, submissions and observations made by the Office of the Planning Regulator, and
 - III. the submissions and observations made by any other persons,

in relation to the draft local area plan in accordance with this section,]

(iii) contain the opinion of the Chief Executive in relation to the issues raised, and his or her recommendations in relation to the proposed material alteration to the draft local area plan, including any change to the proposed material alteration as he or she considers appropriate, taking account of the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.

(m) The members of the authority shall consider the proposed material alteration of the draft local area plan and the report of the Chief Executive under paragraph (k).

(n) Following consideration of the chief executive's report under paragraph (m), the local area plan shall be made or amended as appropriate by the planning authority by resolution no later than a period of 6 weeks after the report has been furnished to all the members of the authority with all, some or none of the material alterations as published in accordance with paragraph (e) or (h) as the case may be.

(o) Where the planning authority decides to make or amend the local area plan or change the material alteration of the plan by resolution as provided in paragraph (n)—

- I. paragraph (p) shall apply in relation to the making of the resolution, and
- II. paragraph (q) shall apply in relation to any change to the material alteration proposed.

(p) It shall be necessary for the passing of the resolution referred to in paragraph (n) that it shall be passed by not less than half of the members of the planning authority and the requirements of this paragraph are in addition to, and not in

substitution for, any other requirements applying in relation to such a resolution.

(q) A further modification to the material alteration—

- i. may be made where it is minor in nature and therefore not likely to have significant effects on the environment or adversely affect the integrity of a European site,
- ii. shall not be made where it refers to—
 - I. an increase in the area of land zoned for any purpose, or
 - II. an addition to or deletion from the record of protected structures.

(r) When performing their functions under this subsection, the members of the planning authority shall be restricted to considering the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.

(4) The Minister may make regulations or issue guidelines in relation to the preparation of local area plans.

(4A) A local area plan made under this section shall have effect 6 weeks from the day that it is made.]

(5) A planning authority shall send a copy of any local area plan made under this Chapter to any bodies consulted under subsection (1), (2) or (3), the Board and, where appropriate, any prescribed body.

(5) In this section 'statutory obligations' includes, in relation to a local authority, the obligation to ensure that the local area plan is consistent with—

- (a) the objectives of the development plan,
- (b) the national and regional development objectives specified in—

- (i) the National Planning Framework, and

(ii) the regional spatial and economic strategy,
and
(c) specific planning policy requirements specified in guidelines
under subsection (1) of section 28.