

Old Connaught 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 are at the Draft stage for the Old Connaught Local Area Plan (LAP).

The process of preparing a Local Area Plan for Old Connaught commenced in May 2023 with a four-week Pre-Draft public consultation phase. An 'Issues Paper' was prepared and circulated, and two open days were held in Old Connaught. Submissions were invited, and the Executive prepared a report summarising the issues raised in the 38 submissions received at pre-draft stage.

The report contained a number of policy recommendations for the Draft Local Area Plan. An Infrastructure Capacity Assessment Study (ICAS) was carried prior to the preparation of a Draft LAP. The ICAS was commissioned 'to establish the existing context and development infrastructure capacities in the two proposed LAP areas and to identify their constraints, challenges, and opportunities in the context of the growth projections in the DLRCC 2022-2028 County Development Plan.'

The Draft Plan has incorporated policy recommendations arising from the pre-draft consultation and a number of recommendations contained within the ABTA and the ICAS. A range of background papers were prepared (Retail and Service Uses Floorspace Capacity Assessment; Community Needs Analysis) 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 Plan.

The Draft LAP, together with the environmental assessments, was placed on public display for a period of not less than 6 weeks from the 6th March to 17th April 2025.

A total of 80 submissions were received and overall, the level of engagement was high and included positive commentary along with 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 Old Connaught. Whilst many of the issues raised related to the Draft LAP, there were also a number of issues raised that related to other service area plans and operational matters of the Council.

We wish 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 days in Old Connaught. We also wish to thank all the Elected Members who also supported and encouraged participation.

1.2 Purpose of the Chief Executive's Report

This Report is submitted to the Elected Members of Dún Laoghaire-Rathdown County Council for their consideration as part of the process for the preparation of the Old Connaught 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) & (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.*
- (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."*

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—*
 - o the National Planning Framework, and*
 - o 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

This 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 as follows:

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.

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 National Transport Authority.
- (c) The response of the Chief Executive to the issues raised, 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 of the Government or of any Minister of the Government.

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. Legislative Background.
- (c) Appendix 3. Acronyms.

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 March 2025 and 17th April 2025. Written submissions and/or observations were invited for a 6 week period ending the 17th April 2025.

During the public consultation period the Council pursued a proactive approach in an attempt to raise awareness of the Draft Local Area Plan among the citizens of Old Connaught 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 March 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 17th April 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 (9.00am-5.00pm)
 - 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 Old Connaught LAP webpage: <https://www.dlrcoco.ie/oldconnaughtlap>.
- A video was produced giving a broad overview of the Draft LAP and was published on the Old Connaught LAP webpage and on the dlr YouTube channel.
- A virtual room was created and added to the Old Connaught LAP webpage.
- A StoryMap providing an overview of the Draft LAP was created and published on the Old Connaught LAP webpage.
- An information leaflet was prepared.

- A public webinar was hosted online on the 20th of March 2025 and was well attended. The recording of the webinar is available to view on the Old Connaught LAP webpage and on the dlr YouTube channel.
- Two Public Information 'drop-in days' were held in the St. Gerard's School, Old Connaught on the dates listed below:
 - Tuesday 25th March 2025: 4pm – 8pm.
 - Tuesday 8th April 2025: 4pm – 8pm.
- Submissions/observations in respect of the Draft LAP were accommodated via hard copy or via the citizens space public consultation portal.

**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>B0053</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>Notes that the submission makes three observations. Outlines the purpose of an observation including that Planning Authorities are advised to action an observation. Outlines the purpose of a submission including that Planning Authorities are requested to give full consideration to the advice contained.</p>	<p>The Executive notes the role of the OPR.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>ii. The OPR commends the extensive pre-engagement and preparatory work undertaken by the Planning Authority to inform the Draft LAP including:</p> <ul style="list-style-type: none"> • The Infrastructure Capacity Assessment Study (ICAS), • An Area Based Transport Assessment (ABTA), • Flood Risk Assessment (FRA) for the Old Connaught Tributary, • Retail and Service Uses Capacity Assessment, • Historic Landscape Character Assessment, • The emerging County Council Community Strategy, • Appropriate Assessment screening, • Strategic Environmental Assessment Report, and, 	<p>The Executive notes and welcomes the commentary.</p> <p>Recommendation No change to the Draft Plan.</p>

Observations, Submissions and Recommendations	Executive's Response & Recommendation
<ul style="list-style-type: none"> Strategic Flood Risk Assessment (SFRA). <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 commends the exemplar collaborative engagement carried out by the Planning Authority in preparation for the ICAS as well as the evidence-based report which has been key to understanding existing infrastructure deficiencies. Notes the main Written Statement would benefit from a summary of this evidence base to ensure there is clarity regarding infrastructure requirements and actions for future development phases.</p> <p>The OPR strongly commends the Planning Authority's approach and quality of Site Development Frameworks / Masterplanning, its integration into the policy context and the detailed consideration of delivery of development in the Phasing and Implementation section of the draft LAP.</p> <p>Welcomes the emphasis on integration of sustainable transport measures and land use planning. Notes the promotion of the 10-minute neighbourhood concept, permeability and integration of key active travel measures with new urban village core, education sites, retail neighbourhood centre, community facilities and childcare needs to ensure the creation of a sustainable new community throughout various sections of the Draft LAP.</p>	<p>The Executive notes and welcomes the commentary in relation to collaboration and the Planning Authority's approach and quality of Site Development Frameworks / Masterplanning, its integration into the policy context and the detailed consideration of delivery of development in the Phasing and Implementation section of the Draft LAP.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>iv. The submission identifies three observations under the following themes:</p> <ul style="list-style-type: none"> Consistency with development plan and core strategy Compact growth, zoning and infrastructural capacity Urban village, retail and employment. 	<p>The Executive notes the issues raised. Each of these observations are addressed in detail in sections 2.1.3, 2.1.4. and 2.1.6.</p> <p>Recommendation See recommendations under Sections 2.1.3, 2.1.4. and 2.1.6. of this report.</p>

Observations, Submissions and Recommendations	Executive's Response & Recommendation
2.1.2 Consistency with the Regional, Spatial and Economic Strategy (RSES)	
<p>v. The OPR note that Old Connaught is identified in the RSES for future growth as part of the westward expansion of the Key Town of Bray, which is recognised as having significant growth potential. Notes that the growth potential of Bray is limited to westward expansion including development lands at Old Connaught. Highlights Regional Policy Objectives (RPO) 4.37 and 4.38 which state the need for coordination between local planning authorities (Wicklow and Dun Laoghaire-Rathdown County Councils) and relevant transport agencies to facilitate the delivery of key transport infrastructure and services. Acknowledges the demonstration of this collaboration via engagement undertaken to produce the ICAS as part of the draft LAP.</p> <p>Notes that the draft LAP lands also form part of Dublin City and Suburbs and are identified within the North South Corridor (DART) for new residential community development as well as included in the Greater Dublin Area Transport Strategy 2022-2042 (GDA Transport Strategy) given the relevance of the provision of the Luas Green Line Southwards to serve Bray and Environs area.</p> <p>The OPR considers the Draft LAP to be generally consistent with RPOs of the RSES for:</p> <ul style="list-style-type: none"> • Compact growth (RPO 3.2 and RPO 3.3), • Metropolitan Area Strategic Plan (MASP) sustainable transport (RPO 5.2 and RPO 5.3), and, • MASP housing and regeneration (RPO 5.4 and RPO 5.5). 	<p>The Executive notes and welcomes the commentary.</p> <p>Recommendation No change to the Draft Plan.</p>
2.1.3 Consistency with the Development Plan and Core Strategy	
<p>vi. The submission makes reference to Section 19(2) and 20(5) of the Planning and Development Act 2000 (as amended) which requires a LAP to be consistent with the Development Plan and</p>	<p>The Executive notes the observation raised in relation to the requirement for the Local Area Plan to demonstrate consistency</p>

Observations, Submissions and Recommendations	Executive's Response & Recommendation
<p>its Core Strategy. Notes the identification of Old Connaught as one of five new residential communities in the south-east corner of the county which is illustrated in figure 2.5 of the draft LAP and 2.9 in the CDP. Notes the CDP Core Strategy table (figure 2.6 of the draft LAP) which identifies approximately 553 hectares for the overall county with an estimated yield of 22,763 – 25,353 residential units and regarding Old Connaught, identifies approximately 50.13 hectares of zoned land with the potential to accommodate 2,005 additional units over the Development Plan period of 2022-2028.</p> <p>Recognises that post adoption of the dlr 2022-2028 County Development Plan (CDP), the section 28 Ministerial Guidelines 2009 were superseded by the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) (Compact Settlement Guidelines). Notes that whilst the quantum and location of the zoned lands remain the same as previous, the residential yield in the Draft LAP has been revised upwards to reflect the Guidelines.</p> <p>Recommends that the details of the potential yield from lands zoned in the CDP be updated and summarised in a table to reflect the changes in density arising from the recently published Compact Settlement Guidelines and set out for the four key Character Areas.</p> <p>Notes the draft LAP's acknowledgement of the important role these lands will play in the residential land supply for the wider Greater Dublin Area and local area, and Policy Objective OCLAP17 which focuses on ensuring a plan led approach to residential density and other policies set out in chapter 4, 5 and 11 which facilitate housing delivery.</p>	<p>with the Development Plan. The subsections of the observation raised by the OPR are addressed in turn as follows.</p> <p>Observation 1: Consistency with Development Plan and Core Strategy</p> <p>(i) provide a clear core strategy summary table which sets out A1 Residential Lands and how this is distributed between the 4 Character Area Zonings/Site Development Frameworks including the site area in hectares, the density being applied to each zoning consistent with the updated Compact Settlement Guidelines and the projected housing yield for each zoning;</p> <p>It is highlighted from the outset that, as required under Section 19(2) of the Planning and Development Act 2000 (as amended), it is the view of the Executive that the Draft Plan is consistent with the Core Strategy of the dlr County Development Plan 2022–2028. The Draft LAP includes a full section relating to Core Strategy Consistency (see section 2.2.1.1, sub-section i, page 13). This Section states that the quantum and location of zoned land identified for development in the Draft LAP is consistent with that identified in the Core Strategy of the Development Plan.</p> <p>The following commentary and recommendation therefore reflects a demonstration of Draft Plan consistency with the Core Strategy of the Development Plan rather than any material change necessary to achieve consistency.</p> <p>As per the Core Strategy of the dlr County Development Plan 2022-2028, there are c. 50 hectares of undeveloped 'A1' zoned land at Old Connaught, with an estimated residential yield of c. 2,005 new homes. Lands identified at Old Connaught for the purpose of the</p>

Observations, Submissions and Recommendations	Executive's Response & Recommendation
<p>Observation 1: Consistency with Development Plan and Core Strategy</p> <p>"Having regard to the compact and sustainable growth of towns and villages and to facilitate and deliver sustainable growth through the Dublin Metropolitan Area Strategic Plan:</p> <ul style="list-style-type: none"> • The core strategy for the Dún Laoghaire-Rathdown County Development Plan 2022 - 2028; • Policy Objective 3.1 and section 3.3.1 of the Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024) (Compact Settlement Guidelines) to achieve appropriate densities that respond to place contexts; and • Appendix A of Development Plans Guidelines for Planning Authorities (2022), <p>the Planning Authority is advised to:</p> <ol style="list-style-type: none"> provide a clear core strategy summary table which sets out A1 Residential Lands and how this is distributed between the 4 Character Area Zonings/Site Development Frameworks including the site area in hectares, the density being applied to each zoning consistent with the updated Compact Settlement Guidelines and the projected housing yield for each zoning; and provide a summary Land Use Zoning table illustrating extent of lands zoned in the draft Old Connaught Local Area Plan 2025 for all land uses including Objective A1 Residential, existing built up, remainder of A1 Lands Undeveloped, Objective F for the Open Nature of Lands, Objective GB and Objective SNI Sustainable Neighbourhood Infrastructure lands as highlighted in chapter 2 of the Written Statement of the draft Local Area Plan." 	<p>Core Strategy, are illustrated in Figure 5.3. of the Draft LAP (see section 5.3.3 Land Availability).</p> <p>Land identified at Old Connaught in the Core Strategy of the County Development Plan are gross areas that assume a wider range of land uses, in addition to residential. This is consistent with the 'A1' zoning objective of the lands – "To provide for new residential communities and Sustainable Neighbourhood Infrastructure in accordance with approved Local Area Plans".</p> <p>As stated in Section 5.3.3 of the Draft LAP, through the Draft plan preparation process, the overall lands at Old Connaught were further analysed and progressed from that provided in the Core Strategy of the County Development. Gross development areas were refined through the identification of a range of land uses and infrastructure requirements including transportation networks.</p> <p>Proposed land uses at Old Connaught are clearly set out in Section 4.3 of the Draft LAP and illustrated in Figure 4.2 and further detailed in the Site Development Frameworks set out in Section 4.4 and other relevant sections of the Plan. For the avoidance of doubt, in Figure 4.1 'Overarching Masterplan for Old Connaught', all lands identified as 'Residential Lands' are zoned Objective 'A1' under the dlr County Development Plan 2022-2028. All lands identified as 'Potential Future Residential Lands' in Figure 4.1 are zoned Objective 'GB' under the County Development Plan with the Objective 'Strategic Land Reserve'.</p> <p>The Draft LAP section on Core Strategy Consistency (see section 2.2.1.1, sub-section i, page 13), states that the Core Strategy estimation of residential yield at Old Connaught was informed having regard to the residential densities recommended in the Section 28 Guidelines 'Sustainable Residential Development in Urban Areas' (2009). Post adoption of the dlr CDP, these Ministerial</p>

Observations, Submissions and Recommendations	Executive's Response & Recommendation
	<p>Guidelines were subsequently superseded by the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) which contain inter alia updated guidance with respect to types.</p> <p>While the quantum and location of zoned land identified for development in the Draft LAP is consistent with that identified in the Core Strategy of the CDP, the residential yield pertaining to the lands was revised having regard to the more recent density parameters provided for in the Sustainable Residential Development and Compact Settlements Guidelines (2024).</p> <p>Section 5.3.4.1 'Residential Density' of the Draft LAP provides comprehensive detail in terms of how the Section 28 Guidelines, 'Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities' (2024) were interpreted and applied and includes policy provision with regard to a plan-led approach to residential density (see Policy OCLAP17 – Plan-Led Approach to Residential Density). At a spatial level, residential densities are illustrated in Figure 4.2 'Old Connaught Masterplan – Land Use and Residential Density'.</p> <p>The observation received from the OPR requests that a summary table is included which sets out A1 Residential Lands and how this is distributed between the 4 Character Area Zonings/Site Development Frameworks by area, density and yield. As set out above, the 'A1' zoning objective incorporates a range of land uses at Old Connaught and is not solely for residential development. The Executive would therefore recommend the inclusion of a modified version of the requested table setting out identified residential lands broken down by LAP Character area including detail of land use area and residential yield. In relation to residential density and consistency with the updated Compact Settlement Guidelines it is</p>

Observations, Submissions and Recommendations	Executive’s Response & Recommendation															
	<p>considered that this is already comprehensively set out in the Draft Plan.</p> <p>Recommendation In Chapter 4 include a new paragraph and table at the end of Section 4.3.1 Land Use (page 24) as follows:</p> <p>“Table 4.1 sets out potential residential yield for lands identified as ‘Residential Lands’ and ‘Potential Future Residential Lands’ in Figure 4.1, for each Character Area/Site Development Framework. It is acknowledged that there may be scope for additional residential development at other lands at Old Connaught beyond that identified in Table 4.1.</p> <table><tr><th>Character Area</th><th>Residential Land Use Area (Hectares)</th><th>Residential Yield</th></tr><tr><td>Central Character Area</td><td>13.04</td><td>790 - 910</td></tr><tr><td>Southern Character Area</td><td>7.56</td><td>455 - 605</td></tr><tr><td>Western Character Area</td><td>16.66</td><td>920 - 1000</td></tr><tr><td>Northern Character Area</td><td>20.54</td><td>1,050</td></tr></table> <p>Table 4.1: Residential Lands at Old Connaught</p> <p>Amend all subsequent table numbers in Chapter 4 and references to these tables in the text in this chapter.</p> <p>Amend the following in Chapter 1 (page 8):</p>	Character Area	Residential Land Use Area (Hectares)	Residential Yield	Central Character Area	13.04	790 - 910	Southern Character Area	7.56	455 - 605	Western Character Area	16.66	920 - 1000	Northern Character Area	20.54	1,050
Character Area	Residential Land Use Area (Hectares)	Residential Yield														
Central Character Area	13.04	790 - 910														
Southern Character Area	7.56	455 - 605														
Western Character Area	16.66	920 - 1000														
Northern Character Area	20.54	1,050														

Observations, Submissions and Recommendations	Executive’s Response & Recommendation																		
	<p>Section 1.5.5 – ‘Future Population in the Old Connaught LAP Area’</p> <p>“Table 1.3 details the potential future population of Old Connaught assuming full build out of the A1 zoned lands. It is estimated that the population of Old Connaught could increase from c. 450 people currently residing in the LAP area to c. 6,000 6,500 <u>5,864</u> – <u>6,744</u> people. Should the lands identified as a Strategic land Reserve, located in the northern environs of the Draft Plan area, be re-zoned at a future point for residential purposes this could increase the population further to c. 8,500 9,000 <u>8,489</u> – <u>9,369</u>.”</p> <table><tr><td></td><td>Homes</td><td>Estimated Population</td></tr><tr><td>Existing Population</td><td>170</td><td>454</td></tr><tr><td>A1’ Zoned Land – Full Build Out</td><td>2,150 2,400 <u>2,165</u> - <u>2,515</u></td><td>5,375 6,000 <u>5,410</u> - <u>6,290</u></td></tr><tr><td>Total</td><td></td><td>5,829 6,454 <u>5,864</u> – <u>6,744</u></td></tr><tr><td>Strategic Land Reserve</td><td>1,050</td><td>2,625</td></tr><tr><td>Total Incl. Strategic Land Reserve</td><td></td><td>8,454 9,079 <u>8,489</u> – <u>9,369</u></td></tr></table> <p>Table 1.3: Potential Future Population in the Old Connaught LAP Area”</p> <p>Amend the following in Chapter 5 (page 47): Section 5.2.1.2 – ‘Community Facilities, i Community Facilities at Old Connaught – Future Provision’</p>		Homes	Estimated Population	Existing Population	170	454	A1’ Zoned Land – Full Build Out	2,150 2,400 <u>2,165</u> - <u>2,515</u>	5,375 6,000 <u>5,410</u> - <u>6,290</u>	Total		5,829 6,454 <u>5,864</u> – <u>6,744</u>	Strategic Land Reserve	1,050	2,625	Total Incl. Strategic Land Reserve		8,454 9,079 <u>8,489</u> – <u>9,369</u>
	Homes	Estimated Population																	
Existing Population	170	454																	
A1’ Zoned Land – Full Build Out	2,150 2,400 <u>2,165</u> - <u>2,515</u>	5,375 6,000 <u>5,410</u> - <u>6,290</u>																	
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Strategic Land Reserve	1,050	2,625																	
Total Incl. Strategic Land Reserve		8,454 9,079 <u>8,489</u> – <u>9,369</u>																	

Observations, Submissions and Recommendations	Executive’s Response & Recommendation			
	<p>“For the purpose of the Draft Plan, it is recommended that the floor space service level indicator of 130sq.m. per 1,000 population is applied. This is consistent with that applied in the emerging dlr Community Strategy. Table 5.1 calculates an indicative community facility requirement factoring in both the existing population at Old Connaught and planned levels of population growth. Assuming the build out of the ‘A1’ zoned lands at Old Connaught, it is estimated that c. 760—840sqm <u>760 – 900</u> of community facilities and services may be required to serve the local community. An additional requirement of c. 340sqm of community facilities may be required should the Strategic Land Reserve lands be progressed.</p>			
		Homes	Estimated Population	Approx. Floorspace Requirement (sqm)
	Existing Population	170	454	60
	A1’ Zoned Land – Full Build Out	2,150—2,400 <u>2,165 - 2,515</u>	5,375—6,000 <u>5,410 - 6,290</u>	700—780 <u>700 - 840</u>
	Total		5,829—6,454 <u>5,864 – 6,744</u>	760—840 <u>760 - 900</u>
	Strategic Land Reserve	1,050	2,625	340
	Total Incl. Strategic Land Reserve		8,454—9,079 <u>8,489 – 9,369</u>	1,100—1,180 <u>1,100 – 1,240</u>
	Table 5.1: Community Facility Need Estimate for Old Connaught”			

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	<p>Amend the following in Chapter 11 (page 115): Section 11.3 – 'Old Connaught LAP Phasing Strategy'</p> <p>"The phasing strategy is broadly summarised as follows:</p> <ul style="list-style-type: none"> • Phase A – These lands are considered sequentially preferable for the first phase of development at Old Connaught, with potential to deliver c. 850—1,000 <u>790 – 910</u> new homes. Phase A incorporates two sub-phases: sub-phase 1 and sub-phase 2. The lands are primarily zoned Objective 'A1' under the dlr County Development Plan 2022-2028. • Phase B – These lands are considered sequentially preferable for the second phase of development at Old Connaught with potential to deliver c. 1,300—1,400 <u>1,375 – 1,605</u> new homes. The lands are zoned Objective 'A1' under the dlr County Development Plan 2022-2028." <p>Amend the following in Chapter 11 (page 117): Section 11.3.1 – 'Old Connaught - Phase A'</p> <p>"The lands are considered sequentially preferable for the first phase of residential development at Old Connaught. Estimates based on the density range parameters set out in section 4.3.2 indicate that the approx. residential yield of Phase A is c. 850—1,000 <u>790 – 910</u> new homes. There is some limited potential for additional residential development through the consolidation and redevelopment of existing residential land uses within this area."</p> <p>Amend the following in Chapter 11 (page 119): Section 11.3.2 – 'Old Connaught - Phase B'</p> <p>"The lands are considered sequentially preferable for the second phase of residential development at Old Connaught. Phase B incorporates three distinct parcels of 'A1' zoned lands: lands located to the south of Old Connaught Avenue and to the east of</p>

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	<p>Thornhill Road; lands to the west of Thornhill Road and east of Ballyman Road; and lands to the north of Ballyman Road. Phase B is illustrated in Figure 11.4. Estimates based on the density range parameters set out in section 4.3.2 in Chapter 4 indicate that the approx. residential yield of Phase B is c. 1,300—1,400 <u>1,375 – 1,605</u> new homes. There is some limited potential for additional residential development through the potential consolidation of existing residential land uses in this area."</p> <p>Amend the following in Chapter 11 (page 120): Table 11.2: 'Old Connaught Phase B - Infrastructure Phasing Table'</p> <p>"c. 1,300—1,400 <u>1,375 – 1,605</u> new homes"</p> <p>Observation 1: Consistency with Development Plan and Core Strategy</p> <p>(ii) provide a summary Land Use Zoning table illustrating extent of lands zoned in the draft Old Connaught Local Area Plan 2025 for all land uses including Objective A1 Residential, existing built up, remainder of A1 Lands Undeveloped, Objective F for the Open Nature of Lands, Objective GB and Objective SNI Sustainable Neighbourhood Infrastructure lands as highlighted in chapter 2 of the Written Statement of the draft Local Area Plan.</p> <p>Land Use zoning in the Old Connaught LAP area is fully detailed in Section 2.2.3.1, sub-section ii 'Land Use Zoning and Objectives' where it states:</p> <p><i>"Land use zoning at Old Connaught is illustrated on Land Use Zoning Map no. 14 of the dlr County Development Plan 2022- 2028 (see Figure 2.7). The Draft Plan area extends in total to circa. 219 hectares comprising c. 68 hectares of land zoned Objective 'A1',</i></p>

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	<p><i>"To provide for new residential communities and Sustainable Neighbourhood Infrastructure in accordance with approved local area plans"; (the 68 hectares includes both existing residential built areas and also the remainder of the as yet undeveloped A1 zoned lands (c.50 hectares)) c.134 hectares of land zoned Objective 'GB', "To protect and enhance the open nature of lands between urban areas"; c.12 hectares of land zoned Objective 'F', "To preserve and provide for open space with ancillary active recreational amenities" and c.0.4 hectares of land zoned Objective 'SNI', "To protect, improve and encourage the provision of sustainable neighbourhood infrastructure".</i></p> <p>The Draft LAP is consistent with the zoning objectives of the dlr County Development Plan 2022-2028 and does not propose any changes to the existing land use zoning in place. It is therefore considered that the OPR request for a summary land use zoning table would comprise a duplication of information that is already contained in the Draft LAP.</p> <p>Recommendation No change to the Draft Plan.</p>
2.1.4 Compact Growth and Zoning and Infrastructural Services	
<p>vii. Submission notes that all lands zoned as A1 within the Draft LAP boundary were zoned as part of the County Development Plan. Notes the draft LAP proposal to extend the LAP boundary northwards to adjoin the Rathmichael LAP area bounding Crinken Lane. Acknowledges that 38 hectares of lands remain zoned Objective GB, Greenbelt and designated as Strategic Reserve Housing Lands.</p> <p>The OPR is satisfied that the land use zonings and Site Development Frameworks are consistent with RPO 3.2 (compact</p>	<p>The Executive notes and welcomes the commentary that the lands within the Draft Plan area were zoned as part of the County Development Plan and that the Draft Plan is consistent with the mentioned RPO's in the RSES and the County development Plan.</p> <p>The Executive also welcomes the positive commentary from the OPR with respect to the quality and comprehensive layout of chapter 4 of the draft LAP 'Spatial Strategy and Site Development Frameworks', as well as how this has been interlinked with the Sustainable Urban Village and Phasing and Implementation chapters.</p>

Observations, Submissions and Recommendations	Executive's Response & Recommendation
<p>form) and RPO 5.2 and RPO 5.3 MASP sustainable transport of the RSES and the County Development Plan.</p> <p>The submission acknowledges and commends the extensive work undertaken to carry out the Site Development Frameworks and notes the quality and comprehensive layout of chapter 4 of the draft LAP, as well as how this has been interlinked with the Sustainable Urban Village and Phasing and Implementation chapters.</p>	<p>Recommendation No change to the Draft Plan.</p>
<p>viii. The submission recognises and commends the Planning Authority in its exemplar and extensive work relating to infrastructure capacity carried out in preparation of the draft Local Area Plan. Refers to the purpose of the ICAS and the collaborative process with relevant stakeholders.</p> <p>Highlights the inclusion of an infrastructure requirement summary in the ICAS and suggest this could be imported into the main Written Statement of the draft LAP to clarify relevant infrastructure requirements.</p> <p>Observation 2 – Infrastructure Capacity Assessment</p> <p>“Having regard to:</p> <ul style="list-style-type: none"> • RPO 5.1 of the RSES; and • Development Plans, Guidelines for Planning Authorities (2022), <p>the Planning Authority is advised to include a summary table of the infrastructure requirements identified in section 2.12, table 2.12 of the Infrastructure Capacity Assessment Study into the Written Statement of the draft Old Connaught Local Area Plan 2025.”</p>	<p>The Executive welcomes the positive commentary from the OPR regarding the extensive work carried out by the Planning Authority relating to infrastructure capacity carried out in preparation of the draft Local Area Plan, and the exemplar standard of this work.</p> <p>OPR Observation 2 – Infrastructure Capacity Assessment</p> <p>The Planning Authority is advised to include a summary table of the infrastructure requirements identified in section 2.12, table 2.12 of the Infrastructure Capacity Assessment Study into the Written Statement of the draft Old Connaught Local Area Plan 2025.</p> <p>The Executive notes the observation to include a summary table of identified infrastructure requirements. It is considered that requisite infrastructure of varying scales is appropriately identified throughout the Draft Plan, and particularly in Chapter 11 'Phasing and Implementation'.</p> <p>Recommendation No change to the Draft Plan.</p>

Observations, Submissions and Recommendations	Executive's Response & Recommendation
2.1.5 Transport and Accessibility	
<p>ix. Welcomes the Planning Authority's focus and commitment to improving the future transport and movement network for the draft LAP as a key to achieving sustainable growth. Notes the importance of the ABTA to the preparation of the draft LAP and as an integral part of the ICAS and its purpose as an evidence base for policies and objectives recommended in Chapter 6 of the draft LAP as well as its integration with the Chapter 4 Spatial Strategy and Site Development Frameworks and Chapter 11 Phasing and Implementation. Welcomes this approach that aligns with the NTA's guidance, and Policy Objective OCLAP28 which requires continued coordination with Wicklow County Council (WCC) and other relevant transport agencies to deliver key enabling infrastructure. Welcomes objectives OCLAP24, OCLAP25, OCLAP26 and OCLAP 27 of the draft LAP to deliver key components for N11/M11 upgrades, protection of national routes and junctions and the Luas Greenline extension.</p> <p>Commends section 6.5 of the draft LAP, specifically Policy Objective OCLAP29, modal shift and 10-minute neighbourhood concept. Notes the importance of including active travel network objectives like Policy Objectives TM3 and TM4 of the draft LAP as well as policies promoting connectivity and permeability like Objectives TM6 and TM7 which also demonstrate consistency with the GDA Transport Strategy and RPO 8.4 of the RSES.</p>	<p>The Executive notes and welcomes the support for the policies and objectives included in the Draft LAP with regard to transport and accessibility.</p> <p>Recommendation No change to the Draft Plan.</p>
2.1.6 Urban Village, Retail and Employment	
<p>x. Notes the inclusion of a dedicated chapter regarding the creation of an urban village around the existing historic core settlement of Old Connaught, historic large houses and associated demesnes.</p>	<p>The Executive welcomes the positive commentary from the OPR including; the provision of a dedicated Chapter regarding the urban village; the Planning Authority's approach to retail capacity assessment; the location of the proposed neighbourhood centre</p>

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<p>Welcomes the Planning Authority's approach to retail capacity assessment including an independent Retail and Service Uses Capacity Assessment to inform the plan. Highlights table 5.2 in chapter 5 of the draft LAP for providing a useful summary of range of estimated capacity Retail (Convenience), Retail (Comparison) and Retail Services with a minimum/maximum ranges for A1 zoned lands as well as the estimated further capacity should the Strategic Land Reserve be developed.</p> <p>Notes the conclusion of the assessment indicates the population and expenditure level projected for Old Connaught are of scale that would justify development of the Neighbourhood Centre.</p> <p>Refers to the floorspace capacity for the Neighbourhood Centre outlined in section 5.4.4., which details the type of retail that could be built and requests clarification of square meters indicated in table 5.2.</p> <p>Welcomes Policy OCLAP23 outlining the role of the Neighbourhood Centre and notes bullet point 4 which indicates a further review of retail capacity, should the Strategic Land Reserve be realised. Notes the policy lacks measures to protect the extent of retail convenience and retail warehousing which is necessary to remain consistent with Policy RET9 of the County Development Plan. Suggests the Planning Authority amend or provide a new policy objective to ensure the proposed Neighbourhood Centre does not undermine the vitality or viability of other established neighbourhood centres or higher tier centres in the wider area such as Bray town centre. Commends the location of the Neighbourhood Centre, the comprehensive Site Development Framework and indicative layout which demonstrates how well the new centre will</p>	<p>and indicative layout; the phasing of the neighbourhood centre; and policy provision for a small scale remote working hub.</p> <p>The Executive notes the observations raised by the OPR which are addressed in turn as follows.</p> <p>OPR Observation 3 - Retail provision at the Neighbourhood Centre</p> <p>(i) clarify the quantum of floorspace provision within chapter 5, section 5.4.4 of the Written Statement of the draft Old Connaught Local Area Plan 2025;</p> <p>An independent assessment of floorspace requirements for retail and service uses to support planned levels of population growth at Old Connaught was undertaken to inform the Draft Plan. Section 5.4.4 of the Draft LAP sets out the main conclusions reached in the independent assessment of floorspace and in terms of convenience floorspace, states the following:</p> <p><i>"In terms of convenience retail there is capacity to develop a moderately sized, self-service supermarket (c.1,000-1,500 gsm) to support the development of A1 zoned lands at Old Connaught."</i></p> <p>Table 5.2 of the Draft LAP 'Floorspace Capacity Assessment' sets out the detailed quantitative findings of the assessment undertaken. The min-max range of convenience retail floorspace was estimated for A1 zoned lands at between 1,150 to 1,240gsm.</p> <p>The Executive acknowledge that the c.1,000-1,500 gsm range indicated in Section 5.4.4 is broader than the more detailed figures in Table 5.2 at between 1,150 to 1,240gsm. However, the more specific figures detailed in Table 5.2 are caveated in the accompanying text which follows Table 5.2, which states that:</p>

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<p>integrate into the existing built form and link with proposed active travel routes.</p> <p>Notes the CDP employment strategy which identifies a number of strategic employment locations in the county including Cherrywood. Notes that no specific lands have been identified for employment uses in the draft LAP although there is an expectation that some level of local employment will take place at the Neighbourhood Centre, schools, childcare facilities, sports clubs and community facilities. Welcomes Policy Objective SUV4 (remote working hub) which aims to facilitate the development of a small scale remote working hub at the Neighbourhood Centre to reduce commuting need.</p> <p>Welcomes the commencement of Neighbourhood Centre development during the early stages of Phase B following the completion of approximately 1300-1400 residential units as indicated in the Infrastructure Phasing table 11.2. Acknowledges this will allow for residents to access day to day retail services while also avoiding the creation of unnecessary journeys outside the area and promoting active travel options to create a more sustainable community.</p> <p>Highlights the consistency of the draft LAP with RPO 6.10 and RPO 6.11 of the RSES, which require the plan to support the retail strategy for the region and ensure the future provision of retail in accordance with the Retail Planning Guidelines for Planning Authorities (2012).</p> <p>Observation 3 - Retail provision at the Neighbourhood Centre</p> <p>"Having regard to the requirement to provide clarity and to ensure consistency with the Dún Laoghaire – Rathdown County</p>	<p><i>"The assessment highlights that notwithstanding the above findings, estimating floorspace need for retail and service uses is not an exact science and the statistical estimates in the assessment should not be rigidly viewed as prescriptive floorspace forecasts. Rather, the findings of the assessment should serve as broad guidance for the development of retail and service use floorspace at Old Connaught."</i></p> <p>The Executive are of the opinion that the conclusion reached which states that in terms of convenience retail there is capacity to develop a moderately sized, self-service supermarket (c.1,000-1,500 gsm) to support the development of A1 zoned lands at Old Connaught, is compatible with the quantitative findings of Table 5.2, having regard to the stated caveats.</p> <p>Recommendation No change to the Draft Plan.</p> <p>OPR Observation 3 - Retail provision at the Neighbourhood Centre</p> <p>(ii) amend Policy Objective OCLAP23 of the draft Local Area Plan or provide a new policy objective to support and be consistent with the County Development Plan which restricts retail convenience and comparison provision in order to protect the vitality and viability of the established neighbourhood centres or higher tier centres in the wider area including Bray town centre.</p> <p>The Executive notes the concerns of the OPR regarding retail convenience and comparison provision and the potential for impacts on established centres, and notably Bray Town Centre. It is highlighted that these matters were of central importance in the</p>

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<p>Development Plan 2022-2028 (County Development Plan) to provide protection of the vitality and viability of the established neighbourhoods and higher tier centres in the wider area:</p> <ul style="list-style-type: none"> • RPO 6.10, RPO 6.11 of the RSES; • Policy Objective RET9 of the County Development County Development Plan; and • The Retail Planning Guidelines for Planning Authorities (2012), <p>the Planning Authority is advised to:</p> <p>(i) clarify the quantum of floorspace provision within chapter 5, section 5.4.4 of the Written Statement of the draft Old Connaught Local Area Plan 2025; and</p> <p>(ii) amend Policy Objective OCLAP23 of the draft Local Area Plan or provide a new policy objective to support and be consistent with the County Development Plan which restricts retail convenience and comparison provision in order to protect the vitality and viability of the established neighbourhood centres or higher tier centres in the wider area including Bray town centre."</p>	<p>assumptions incorporated in the assessment of floorspace requirements for retail and service uses to support planned levels of population growth at Old Connaught.</p> <p>In terms of convenience retail a range of assumptions were applied including an estimation that approximately 60% - 65% of convenience goods expenditure (less online spend) by Old Connaught residents would take place in Old Connaught. This assumption took account of the importance of convenience retail at the neighbourhood level in achieving the '10-minute' settlement concept and promoting sustainable movement patterns but also the close proximity of a number of existing supermarkets.</p> <p>In terms of comparison retail, the assessment fully acknowledged that the majority of spend would take place in larger / higher order centres and not smaller settlements like Old Connaught. The assessment assumed that only approximately 10% - 15% of LAP expenditure on comparison goods would be retained by shops in Old Connaught, meaning the overriding majority of shopping for comparison goods would be undertaken outside the LAP area in the larger centres, including inter alia Bray, Cherrywood, Dundrum, Dún Laoghaire and Dublin City Centre. As noted in the assessment it was considered that the provision of comparison retail at Old Connaught, other than that which serves a need at the neighbourhood level such as for example a local pharmacy, could undermine the role of Bray Town as the principal higher order retail and service destination serving the area.</p> <p>Having regard to the above, it is considered that the Draft Plan has comprehensively considered both existing centres and higher tier centres in the wider area including notably Bray Town, and these considerations were embedded in the assumptions applied in the assessment of retail and service uses at Old Connaught.</p>

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	<p>Notwithstanding, the Executive supports the observation from the OPR to amend Policy Objective OCLAP23 to highlight the need to protect the vitality and viability of established higher tier centres.</p> <p>Recommendation Amend Policy OCLAP23 – Multi-Functional Neighbourhood Centre (Section 5.4.5, page 53) and insert a new bullet point as follows:</p> <p>"Policy OCLAP23 – Multi-Functional Neighbourhood Centre</p> <p>It is Policy to provide an appropriate multifunctional neighbourhood centre at Old Connaught having regard to the findings of the Floorspace Capacity Assessment set out in Section 5.4.4.</p> <ul style="list-style-type: none"> • The Neighbourhood Centre located in the Village Core (see Section 4.4.4) will comprise the primary multi-functional centre located within the LAP area and should, at a minimum, provide for the retail and service use needs associated with the current A1 zoned lands. • <u>The quantum of retail convenience and comparison provision shall have regard to the need to protect the vitality and viability of higher tier centres in the wider area, including in particular Bray Town.</u> • The Neighbourhood Centre shall ensure a high quality and attractive civic environment and provide a sense of both place and vitality which also optimises active travel movement and access to public transport. • Development of the Neighbourhood Centre shall be generally consistent with the provisions set out in the Site Development Framework for the Old Connaught Village Core – see Chapter 4.

Observations, Submissions and Recommendations	Executive's Response & Recommendation
	<ul style="list-style-type: none"> Having regard to the fluid and evolving nature of retail and service provision, including changing shopping trends, the potential future development of lands identified as Strategic Land Reserve for residential purposes will be subject to an assessment of additional retail and service floorspace need undertaken through the development management process. The outcome of the assessment will have particular regard to achieving inter alia the 10-minute neighbourhood concept."
2.1.7 Flood Risk Management	
<p>xi. Submission notes the extensive work undertaken by the Planning Authority to review flood risk management since the publication of the CDP and the extensive engagement with the Office of Public Works (OPW) throughout the process.</p> <p>Acknowledges that a SFRA has been carried out for the draft LAP in accordance with the provisions of the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) and the CDP. Notes Policy Objective E122 of the CDP.</p> <p>The submission commends the Planning Authority's approach outlined in section 10.5.1 of the draft LAP and also welcomes the commission of the separate Flood Risk Assessment of the upstream catchment area of the Old Connaught Tributary to inform the SFRA.</p> <p>Outlines the purpose of the assessment to reanalyse the predicted flood extents within the catchment and to verify the accuracy of the CFRAMS flood extent mapping, and notes the key differences applied in the Flood Risk Assessment model. Notes the flood extents produced by the FRA model are different to the CFRAMS flood extent mapping around Old</p>	<p>The Executive notes and welcomes the support for the policies and objectives included in the Draft LAP with regard to flood risk management.</p> <p>Recommendation No change to the Draft Plan.</p>

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<p>Connaught Avenue, in both the 1% AEP and the 0.1% AEP events.</p> <p>Notes the Planning Authority have requested OPW to review the CFRAMS mapping as part of the OPW Mapping Review Program. Reference is made to section 10.5 of the draft LAP which illustrates the revised flood extents for the Old Connaught Area which demonstrates only two remaining areas of land within flood extents A and B.</p> <p>The OPR welcomes the Planning Authority's approach in considering the outcome of the SFRA and revised flood extent maps and ensuring that these areas of land have not been zoned for future residential or vulnerable uses in the Site Development Frameworks in the Draft LAP (in the eastern section of the Central Character Area, figure 4.12 and the northeast section of the Northern Character Area, figure 4.29).</p> <p>Acknowledges Policy OCLAP60 which addresses the need for site specific FRA, Policy OCLAP61 which addresses Flood Risk considerations for proposed development in and adjacent to Flood Zone A and B and Policy Objective OCLAP57 which ensures Sustainable urban Drainage Systems (SuDS) are applied to any development in the plan area.</p>	
2.1.8 Environment, Built and Natural Heritage	
<p>xii. Submission notes and welcomes the integration and implementation of the policies and provisions of the DLR Climate Action Plan 2024-2029 in the preparation of the Draft LAP.</p>	<p>The Executive notes the comments received.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>xiii. Submission welcomes the creation of the specific chapter 7 with policies and objectives in relation to Green Infrastructure and Biodiversity including protective policies OCLAP36, protecting existing green infrastructure, Objective GIB1 and</p>	<p>The Executive notes the comments received.</p> <p>Recommendation No change to the Draft Plan.</p>

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<p>GIB2 having regard to Landscape and Historic Character Area Assessments.</p> <p>Commends the Planning Authority's approach to Biodiversity in Objective GIB15, encouraging proposals at preplanning and application stage to demonstrate how biodiversity has informed process and where appropriate to pilot Biodiversity Net Gain Approach for development. The submission also commends Policy Objective GIB16 on Rewilding and Habitat Restoration/Creation, Nature Based solutions, SuDS and Attenuation Ponds.</p>	
<p>xiv. Submission acknowledges the provision of the Historic Landscape Character Assessment and policies and objectives for the protection of built heritage and archaeological heritage in accordance with RPO 9.27 of the RSES, in particular Policy Objectives OCLAP46, OCLAP47 and OCLAP48 regarding the protection of, alterations and change of use of Protected Structures. Objectives specific to Victorian Walled Gardens and Jubilee Hall are also noted. The Office particularly welcomes Policy Objectives OCLAP49, OCLAP50, OCLAP51 and OCLAP52 of which provide specific protection to the historical core and character of Old Connaught to ensure future development is carried out sympathetically and to a high quality.</p>	<p>The Executive notes the comments received.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>2.1.9 Education, Social and Community</p>	
<p>xv. Submission commends the ongoing engagement of the Planning Authority with the Department of Education regarding the provision of future school requirements in the County and notes that if the full housing potential in the draft LAP Area is realised, there would be a requirement for two primary schools. Notes that draft LAP aligns with the CDP Objective PHP7 to provide school facilities in the Old Connaught area.</p>	<p>The Executive notes and welcomes the comments received including support for the appropriateness of the strategic locations for proposed school sites at Old Connaught.</p> <p>Recommendation No change to the Draft Plan.</p>

Observations, Submissions and Recommendations	Executive's Response & Recommendation
<p>Notes the identification of lands for education northeast of Old Connaught House, which are identified as Strategic Land Reserve. Welcomes the site selected as strategically located and adjoining key residential growth areas and well-integrated by future active travel connections. Note that an active travel corridor consisting of an indicative bus route, Cherrywood to Bray Cycle route and an indicative Luas corridor line to the east of the proposed school site. Welcomes the close proximity and network of strategic open spaces, with the adjoining Allies River Road Active Park and the other existing and proposed spaces.</p> <p>Notes that the draft LAP identifies the need for a second primary school and a post primary school co-located at lands located in the northern section of the Northern Character Area (section 5.2.1.1, figure 5.1). Submission acknowledges the reasoning for the site selection and the plans to future-proof the education land requirements to serve wider future growth at Old Connaught and adjacent growth community including Rathmichael. Notes the proposed site will benefit from planned active travel upgrades and importantly the extra post primary provision will reduce unsustainable travel patterns to existing schools.</p> <p>Notes and welcomes Policy Objectives OCLAP7 and OCLAP8 which support and align with the CDP for school provision and the promotion of shared school facilities in the community.</p>	
<p>xvi. Submission recognises the identification of lands in the draft LAP for community infrastructure, as recommended by the Community Strategy. Welcomes the provision of a site for one large (760 - 840 sqm) community facility within the central area and a second smaller facility (340 sqm) in the Southern Character Area integrated within the new planned Village Green. Notes the associated Policy Objective OCLAP9 to support their delivery.</p>	<p>The Executive notes the comments received.</p> <p>For clarity purposes, it is noted that the Draft LAP does not include specific floorspace figures for each preferred location for community infrastructure across the Plan area. Future provision and the distribution of same is comprehensively set out in section 5.2.1.2 Community Facilities of the Draft LAP.</p>

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	Recommendation No change to the Draft Plan.
xvii. Submission notes the inclusion of Policies OCLAP12 and OCLAP13 on the facilitation of Healthcare and Nursing Home facilities. Welcomes the strong policies on the provision of childcare facilities in Policy Objective OCLAP10.	The Executive notes the comments received and in particular the support for the inclusion of strong policy in relation to childcare facilities. Recommendation No change to the Draft Plan.
xviii. Welcomes the strong policy in Policy Objective OCLAP11 for the facilitation of co-location sites at schools, strategic open spaces and other community facilities and nodes which will support the need to reduce unsustainable travel patterns within the local and wider county level.	The Executive notes and welcomes the comments received. Recommendation No change to the Draft Plan.
2.1.10 Implementation and Monitoring	
xix. Submission welcomes the inclusion of Chapter 12 Implementation and Monitoring which sets out the implementation and /or phasing of relevant policies and objectives.	The Executive notes and welcomes the comments received. Recommendation No change to the Draft Plan.

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

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National Transport Authority (NTA) – B0059	
2.2.1 General Comments	
i. The submission from the NTA provides the following general comments: <ul style="list-style-type: none"> Notes the NTA was represented on the Stakeholder Board for the ICAS and provided input on transport- 	The Executive notes the comments received and in particular the role of the NTA in providing input on transport related matters as part of the preparation of the ICAS and ABTA which formed the basis of transport proposals in the Draft LAP.

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<p>related matters throughout the preparation of the Study. Refers to the use of the NTA/TII Area Based Transport Assessment (ABTA) Model in the ICAS which formed the basis of the transport proposals contained in the Draft LAP.</p> <ul style="list-style-type: none"> The NTA is supportive in general of the policies and objectives set out in the Draft LAP, and of the Council's commitment to plan-led development. 	<p>The Executive further welcome the NTA's general support for the policies and objectives set out in the Draft LAP, and of the Council's commitment to plan-led development.</p> <p>Recommendation No change to the Draft Plan.</p>
2.2.2 Chapter 6 – Transport and Movement – Vehicular Circulation	
<p>ii. The NTA has no objection in principle to the road proposals contained in the Draft LAP. The submission notes the limited number of new roads and their intended purpose to provide for orbital circulation of traffic away from the village core in the south and west of the LAP area, to provide access to development lands, and to serve as replacement strategic road links in lieu of the widening of existing sub-optimal roads. The NTA highlights the proposed bridge over the M11 linking Old Connaught to the Dublin Road as a key element of the new road network, which will facilitate the implementation of a range of active travel and public transport measures in the LAP area.</p>	<p>The Executive notes the comments received and in particular that the NTA has no objection in principle to the road proposals contained in the Draft LAP.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>iii. The NTA recommends that Objective TM19 – Roads and Streets should be re-worded to reflect the current funding arrangements for local roads. The submission highlights that the NTA is not a funding agency for local roads, which are the responsibility of the Department of Transport, and recommends Objective TM19 be re-worded to reflect this.</p>	<p>The Executive notes the issue raised and acknowledge the NTA is not a funding agency for local roads. In this regard, it is recommended that Objective TM19 – Roads and Streets is amended to clarify this.</p> <p>Recommendation Amend Objective TM19 – Roads and Streets (section 6.6.4, page 71) as follows:</p> <p>"Objective TM19 – Roads and Streets</p> <p>It is an Objective, in conjunction and co-operation with other the <u>relevant</u> transport bodies and authorities such as the TII and the</p>

Observations, Submissions and Recommendations	Executive's Response & Recommendation
	<p>NTA, to secure improvements to the local road network at Old Connaught whilst ensuring that the priority is still sustainable transport modes, subject to compliance with TII, <u>NTA and other relevant publications</u> where applicable."</p>
<p>iv. The NTA recommends that Objective TM20 should be amended, such that off-line facilities should be considered in the development of roads schemes, but not in lieu of in-line facilities where they are required, and that any off-line facilities must be fit for purpose throughout the day and year-round. The NTA would support an amended Objective TM20 that provides for both off and on-line facilities, rather than off-line only as an alternative to on-line.</p>	<p>The Executive notes the issue raised and agrees with the recommendation of the NTA. It is recommended that Objective TM20 is amended to reflect the issue raised.</p> <p>Recommendation Amend Objective TM20 – Road Schemes (section 6.6.4, page 71) as follows:</p> <p>"Objective TM20 – Road Schemes</p> <p>It is an Objective that road schemes will be designed, as appropriate, to provide safe and appropriate arrangements to facilitate walking, cycling and public transport provision, including as applicable, the delivery of <u>on-line</u> walking and cycling facilities <u>and where applicable off-line facilities</u> where this is considered to be a more attractive solution for these modes."</p>
2.2.3 Chapter 6 – Transport and Movement – Cycle Parking	
<p>v. The NTA are supportive of Policy OCLAP34 and Objective TM8 which relate to cycle parking in the LAP area but recommend that further detail be provided regarding the design and layout of such facilities.</p> <p>The NTA recommends that Policy OCLAP 34 and Objective TM8 be revised to take account of the full spectrum of cycle types and users, providing for both long-term storage and short-term parking, in both the public realm and in new developments. The NTA also recommends that Policy OCLAP 34 and Objective TM8 should refer explicitly to current design guidance set out in the council's <i>Standards for Cycle Parking and associated Cycling</i></p>	<p>The Executive notes the issues raised.</p> <p>It is highlighted that Section 12.4.6 'Cycle Parking' of the dlr County Development Plan 2022-2028 already includes detailed standards in relation to cycle standards, including the provisions of the Council's <i>Standards for Cycle Parking and associated Cycling Facilities for New Developments</i>.</p> <p>As set out in Policy OCLAP 34 of the Draft LAP it is policy to provide high quality cycle parking and cycle storage facilities across the Old Connaught LAP area in accordance with <i>inter alia</i> the provisions of the dlr County Development Plan 2022-2028 and the Sustainable</p>

Observations, Submissions and Recommendations	Executive's Response & Recommendation
<p><i>Facilities for New Developments</i> and in the NTA's <i>Cycle Design Manual</i>.</p>	<p>Residential Development and Compact Settlements Guidelines (2024). It is not considered necessary to duplicate the provisions of the dlr County Development Plan in relation to cycle parking in the Draft Plan.</p> <p>In terms of current design guidance, the Executive notes the NTA's recommendation to include reference to the NTA's <i>Cycle Design Manual</i> and it is recommended that Policy OCLAP34 – Cycle Parking is amended to reflect this.</p> <p>Recommendation Amend Policy OCLAP34 – Cycle Parking (section 6.6.6.2, page 68) as follows:</p> <p>"Policy OCLAP34 – Cycle Parking</p> <p>It is Policy to provide high quality cycle parking and cycle storage facilities across the Old Connaught LAP area in accordance with inter alia the provisions of the dlr County Development Plan 2022-2028, and the Sustainable Residential Development and Compact Settlements Guidelines (2024) <u>and the NTA's Cycle Design Manual.</u>"</p>
2.2.4 Chapter 11 – Phasing and Implementation	
<p>vi. The NTA is supportive of the preparation of a phasing plan for the development of the LAP area. The NTA is broadly supportive of the proposed phasing sequence, which prioritises lands closest to existing public transport services east of the M11 in the short term. Subsequent phases, to the west and south of the LAP area, would be dependent on the delivery of a range of infrastructure including transport measures such as new roads, bus services and active travel facilities.</p> <p>The submission suggests that the phasing tables could be explicit in aligning the delivery of other roads such as the</p>	<p>The Executive welcome the NTA's positive commentary regarding the preparation of a phasing plan and the proposed phasing sequence.</p> <p>Recommendation No change to the Draft Plan.</p> <p>The Executive notes the issues raised. Please see vii below for the consideration and reply.</p>

Observations, Submissions and Recommendations	Executive's Response & Recommendation
<p>southern orbital route links with the delivery of the new north-south link road and the M11 overbridge. Alternatively, the submission notes that additional criteria could be included in the phasing tables that would allow residential developments to be permitted and constructed, but not occupied until the required roads infrastructure is in place.</p>	
<p>vii. The NTA recommends that the release of Phase C lands should be contingent on the completion of the M11 overbridge and that the phasing of development would merit further consideration with regard to the other roads in the draft LAP, to ensure that new residential areas are not characterised by high levels of car use from the outset.</p>	<p>The Executive notes the issues raised and recommendations therein. The Phase C lands are presently part of the strategic land reserve as identified in the core strategy of the dlr 2022-2028 County Development Plan, indicating potential for residential development in the future. The phasing strategy in the draft Plan applies a blended approach which seek to prioritise development, whilst not unduly restricting development and housing delivery whereupon sufficient infrastructure and services are in place to support sustainable development.</p> <p>It is therefore considered that linking the completion and operation of the M11 overbridge prior to the development the Phase C lands may be overly restrictive and may inhibit the future development and delivery of these lands. The phasing strategy of the draft LAP is intended to align, where possible, timeframes associated with the delivery of the overbridge and the consent and development timeframes for the development of the Phase C lands.</p> <p>In relation to the recommendation of giving further consideration to the alignment of phasing of other new roads in the draft LAP, it is considered that the phasing strategy aims to be adaptive to progressing development in the area on a geographically sequential basis whilst providing for active travel and public transport measures in parallel to provide mode shift opportunities.</p> <p>Recommendation No change to the Draft Plan.</p>

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

3.1 Chapter 1 – Introduction and Local Area Context

Issues	Sub. No.	Executive's Response & Recommendation
3.1.1 Section 1.3 Plan-Making Process and Public Consultation		
i. Commends the quality of the presentations of the Draft plan as well as the engagement of Council staff regarding the plan proposal explanations during the public information sessions.	<u>B0022</u> <u>B0030</u>	The Executive welcomes and acknowledges the comments received. Recommendation No change to the Draft Plan.
ii. Disappointment regarding a lack of direct engagement between the Bray Emmets sports club and the Planning Authority during the preparation of the Draft LAP iii. Notes a lack of communication and consultation from the local authority regarding plans in the vicinity of their property. There was inadequate publicity around the consultation phase, and this undermines the trustworthiness of the process.	<u>B0035</u> <u>B0068</u>	The Executive notes the comments received. Sections 1.1 and 1.4 above of this report describe the comprehensive public consultation that was undertaken during the plan making process. Pre-Draft public consultation took place in May to June 2023 and two public information evenings were held in St. Gerards School in Old Connaught. The Draft Plan and the Draft Environmental Reports were placed on public display for 6 weeks between 6th March 2025 and 17th April 2025. Written submissions and/or observations were invited for a 6 week period ending the 17th April 2025. Two public information evenings were held in St. Gerards School in Old Connaught on the 25 th March 2025 and the 8 th April 2025. Dlr staff were present and met with members of the public to provide information on the Draft Plan and help with queries. A webinar was held on the 20th of March 2025 which was well attended. In addition,

Issues	Sub. No.	Executive's Response & Recommendation
		<ul style="list-style-type: none"> • A video was produced giving a broad overview of the Draft LAP and was published on the Old Connaught LAP webpage and on the dlr YouTube channel. • A virtual room was created and added to the Old Connaught LAP webpage. • A storymap providing an overview of the Draft LAP was created and published on the Old Connaught LAP webpage. • An information leaflet was prepared and made available. <p>Given the above, it is considered that the Draft Plan was prepared following comprehensive engagement and consultation with a wide range of stakeholders including the existing community in Old Connaught.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>iv. Lack of consideration in the draft LAP regarding existing residents of Old Connaught during the plan development. The draft LAP is developer led.</p> <p>v. Recent developer acquisitions in the area have reduced the population due to houses becoming vacant.</p>	<p><u>B0049</u> <u>B0068</u></p>	<p>The Executive notes the comments received.</p> <p>Sections 1.1 and 1.4 above of this report describe the comprehensive public consultation that was undertaken during the plan making process, which included consideration of the existing residents of Old Connaught.</p> <p>Pre-Draft public consultation took place in May to June 2023 and two public information evenings were held in St. Gerards School in Old Connaught.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>The Draft Plan and the Draft Environmental Reports were placed on public display for 6 weeks between 6th March 2025 and 17th April 2025. Written submissions and/or observations were invited for a 6 week period ending the 17th April 2025.</p> <p>Two public information evenings were held in St. Gerards School in Old Connaught on the 25th March 2025 and the 8th April 2025. Dlr staff were present and met with members of the public to provide information on the Draft Plan and help with queries.</p> <p>A webinar was held on the 20th of March 2025 which was well attended.</p> <p>It is not considered that the Draft Plan is developer led. The Draft Plan was prepared following comprehensive engagement and consultation with a wide range of stakeholders including the existing community in Old Connaught.</p> <p>Recommendation No change to the Draft Plan.</p>
vi. For future information days drone footage of development should be made available on screens and a 'walk through' of the development should take place.	<u>B0079</u>	<p>The Executive notes the comments received and the suggestion therein.</p> <p>Recommendation No change to the Draft Plan.</p>
3.1.2 Section 1.4.1.1 Infrastructure Capacity Assessment Study		
i. The interdependence between Old Connaught and Rathmichael has not been fully reflected in the draft LAP despite the commissioning of the Infrastructure Capacity Assessment Study (ICAS) which covered both Old Connaught and Rathmichael.	<u>B0050</u>	<p>The Executive notes the issue raised and would not concur.</p> <p>The Executive are acutely aware of the interdependence of the two areas. The Draft Plan boundary is proposed to be extended to join the Rathmichael area and the draft Old</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>Connaught LAP area, to reflect infrastructural interdependencies between the two areas.</p> <p>Also, in Chapter 4 – 'Spatial Strategy and Site Development Frameworks' of the Draft Plan, the proposed northern character area site development framework indicates clear infrastructural connections and interdependencies to Rathmichael.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>ii. The recommendations from the ICAS are contrary to the modal and intervention hierarchies - National Investment Framework for Transport in Ireland (NIFTI).</p>	<p><u>B0064</u></p>	<p>The Executive notes the issue raised and would not concur.</p> <p>The ICAS was prepared in conjunction and collaboration with a project stakeholder board which included Transport Infrastructure Ireland and the National Transport Authority.</p> <p>The project stakeholder board reviewed, inputted and considered the iterative stages of the ICAS project and supported its final publication.</p> <p>It is also noted that the ICAS study receives support in the submissions to the Draft Plan from the Office of the Planning Regulator (OPR), Transport Infrastructure Ireland (TII) and the National Transport Authority (NTA), among others.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>iii. Submission presents opinion that no phasing exercise was undertaken to determine the quantum of development that could take place on the LAP lands before the junction reached capacity, and that no capacity enhancements were undertaken at the Dublin Road/Old Connaught Avenue</p>	<p><u>B0064</u></p>	<p>The Executive notes the issue raised.</p> <p>The proposed bus gates at Old Connaught Avenue will reduce through traffic and create an active travel and public transport priority area within Old Connaught Village and along</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>junction to improve its capacity /safety for all modes based on modelling exercise undertaken as part of ICAS.</p>		<p>Old Connaught Avenue as far as the junction with Dublin Road.</p> <p>This junction may be subject to upgrading via the Bray to Dublin City Centre BusConnects scheme. The scheme also aims to reduce traffic congestion via the provision of dedicated bus and cycling infrastructure at this junction. It is acknowledged that planning permission has been permitted for the scheme, which is currently being challenged.</p> <p>Until that time, it is noted in the Draft Plan (Objective TM22) that it is an objective to upgrade local junctions throughout the Draft Plan area, where required, through the development management process and other appropriate mechanisms, to support integrated transport proposals catering for all road users and to make a positive contribution to the public realm.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>iv. Objects to the identification of Package 3 as the emerging preferred option for development at Old Connaught in the ICAS report, it is not clear from the summary assessment as to why this is the preferred chosen package.</p> <p>v. Objects to the absence of the point that Package 3 is reliant on the delivery of a costly new road over the N11 at Junction 5 with a new connection onto the Dublin Road within the Multi Criteria Analysis (MCA) process given that the proposal is contrary to principles established in NIFTI which seeks to optimise use of existing infrastructure before introducing new roads.</p>	<p><u>B0064</u></p>	<p>The Executive notes the issue raised.</p> <p>The ICAS process was a complex and comprehensive study which included five parts. Part 3 of the study was the Options Development and Assessment Report, and this report also provided an Area Based Transport Assessment (ABTA) of the Old Connaught and Rathmichael areas. In the Part 3 report five transport package options were developed for the Old Connaught area.</p> <p>These transport package options were assessed by way of a multi criteria analysis. This involved an assessment of the packages via key performance indicators. Following the multi criteria analysis of all the five transport package options, the emerging preferred scenario of package 3 emerged.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>This emerging preferred scenario was considered to be a balanced approach to transport provision in the Old Connaught area, including active travel, facilitating public transport, new road networks and road upgrades. It is also acknowledged that during the ICAS, the development of the ABTA and the transport packages including the emerging preferred scenario were reviewed and supported by TII and the NTA.</p> <p>Recommendation No change to Draft Plan.</p>
3.1.3 Section 1.5.3 Existing Landscape		
i. The bedrock beneath the area is not granite, but "dark blue-grey slate, phyllite and schist".	<u>B0058</u>	<p>The Executive notes the issue and sees the benefit in changing the wording</p> <p>Recommendation Amend Section 1.5.3 (page 6) as follows:</p> <p>"The landscape in Old Connaught area is strongly influenced by the undulating form of underlying granite <u>dark blue-grey slate, phyllite and schist.</u>"</p>
ii. Notes that "Knocklinn House" and "Thornhill House" should remove house from the wording.	<u>B0058</u>	<p>The Executive notes the issue raised and sees the benefit in changing the wording.</p> <p>Recommendation Amend Section 1.5.3 (page 6) as follows:</p> <p>"The Ordnance Survey maps dating from 1843 to the present day illustrates the area as a landlord-dominated landscape with the presence of many large houses, for example, Old Connaught House, Jubilee Hall, Knocklinn House and Thornhill House (currently St. Gerard's school)."</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>Amend Section 9.2 (page 95) as follows:</p> <p>"The Historic Ordnance Survey map illustrates the area as a landlord-dominated landscape with the presence of many large houses, for example, Old Connaught House, Jubilee Hall, Knocklinn House and Thornhill House (currently St. Gerard's school)."</p>
<p>iii. Notes that most dwellings along Old Connaught Avenue have good sized front gardens.</p>	<p><u>B0058</u></p>	<p>The Executive notes the issue raised and sees the benefit in clarifying this point.</p> <p>Recommendation Amend Section 1.5.3 (page 6) as follows:</p> <p>"The dwellings along Old Connaught Avenue mainly front onto the roadway, with little or no front gardens, whereas the residential development along the three remaining roads, consists primarily of large, detached dwellings set back from the road."</p>
<p>iv. Notes that the fields within the LAP are almost all arable.</p>	<p><u>B0058</u></p>	<p>The Executive notes the issue raised and sees the benefit in clarifying the wording.</p> <p>Recommendation Amend Section 1.5.3 (page 6) as follows:</p> <p>"The majority of the flat and gently sloping lands consist of undulating farmland, laid out in large pasture <u>arable</u> fields, and delineated by low hedges and trees."</p>
<p>3.1.4 Section 1.5.4 Population and Demographics</p>		
<p>i. Notes that there are more than two vacant houses in the LAP area with figures indicating (at least) two on Thornhill Road, three on Ferndale Road and seven on Old Connaught Avenue.</p>	<p><u>B0058</u></p>	<p>The Executive notes the issue raised and appreciate the information provided, however the data provided within the Draft Plan is considered to be sufficient.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		Recommendation No change to Draft Plan.
3.1.5 Section 1.5.5 Future Population in the Old Connaught LAP Area		
i. Submission is of the opinion that placing a cap on the quantum of potentially deliverable development is questionable.	<u>B0064</u>	The Executive notes the issue raised. This section of the Draft Plan provides guidance on the range of population that may be achieved following the development of the Old Connaught area. It is not considered to be a cap on deliverable development. Recommendation No change to Draft Plan.

3.2 Chapter 2 – Strategic Planning Framework

Issues	Sub. No.	Executive's Response & Recommendation
3.2.1 Section 2.2.1.2 Section 28 Ministerial Guidelines		
<p>i. Transport Infrastructure Ireland recommend that subsection 2.2.1.2 Section 28 Ministerial Guidelines should be revised to make reference to the Spatial Planning and National Roads Guidelines for Planning Authorities (2012), as follows:</p> <p>"The Guidelines of particular importance in the preparation of this Draft Plan include inter alia: Spatial Planning and National Roads Guidelines for Planning Authorities (2012); Local Area Plans – Guidelines for Planning Authorities (2013); Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities (2024); Sustainable Urban Housing: Design Standards for New Apartments' (2022); and Urban Development and Building Height Guidelines (2018)...."</p>	<u>B0018</u>	<p>The Executive notes the issue raised.</p> <p>Section 2.2.1.2 of the Draft LAP 'Section 28 Ministerial Guidelines' is not intended to provide a composite list of all Section 28 Guidelines which have informed the Draft Plan and rather makes reference to some of the Guidelines of particular importance in the preparation of the Draft Plan. A comprehensive list of national Guidelines which informed the Draft Plan is set out in detail in Appendix 2 'Statutory Planning Context'.</p> <p>The Planning Authority fully acknowledge the importance of the Spatial Planning and National Roads Guidelines for Planning Authorities (2012) and in this regard Section 6.3.3 of the Draft Plan comprises a full section in relation to these specific Guidelines.</p> <p>Recommendation No change to the Draft Plan.</p>
3.2.2 Section 2.2.2.1 Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019-2031		
<p>i. Submission from EMRA welcome the overall approach and effort to coordinate and incorporate policies and objectives in the Draft LAP so that they are consistent with the RSES.</p>	<u>B0044</u>	<p>The Executive notes and acknowledges the comments received.</p> <p>Recommendation No change to the Draft Plan.</p>
3.2.3 Section 2.2.3.1 dlr County Development Plan 2022-2028		
<p>i. Objects to the proposed 2,400 housing units due to the impact on the character, environments and infrastructure of Old Connaught. Reduce the number of proposed housing units.</p>	<u>B0011</u> <u>B0034</u>	<p>The Executive notes the issues raised.</p> <p>Section 19(2) of the Planning and Development Act 2000 (as amended) states that a Local Area Plan shall be consistent with the Core Strategy of the County Development Plan.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>The quantum and location of zoned lands identified for development in the Draft Plan is consistent with that identified in the Core Strategy of the dlr County Development Plan 2022-2028. The residential yield pertaining to the lands was calculated having regard to the density parameters provided for in the Sustainable Residential Development and Compact Settlements Guidelines (2024).</p> <p>Recommendation No change to the Draft Plan.</p>
<p>ii. Land along Allies River Road is the last remaining green belt. Retaining this green belt land is vital to the protection of wildlife and biodiversity.</p>	<p><u>B0020</u> <u>B0021</u></p>	<p>The Executive notes the issue raised.</p> <p>The lands in this area have a land use zoning objective GB: 'To protect and enhance the open nature of lands between urban areas' in the dlr County Development Plan 2022-2028. They also feature an objective for 'Strategic Land Reserve'.</p> <p>In the higher order dlr County Development Plan 2022-2028, Policy Objective CS4 – 'Strategic Land Reserve' states,</p> <p><i>'It is a Policy Objective to support the phased growth of the Key Town of Bray through the identification of a strategic land reserve to meet regional growth targets to 2031.'</i></p> <p>Recommendation No change to the Draft Plan.</p>
<p>iii. Submission from the Department of Education requests that all school sites are rezoned to 'Objective SNI'.</p>	<p><u>B0076</u></p>	<p>The Executive notes and acknowledges the issue raised.</p> <p>The areas indicated as proposed education sites in the Draft Plan have a land use zoning 'Objective GB' – "To protect and enhance the open nature of lands between urban areas". As set out in Table 13.1.6 in Chapter 13 of the County Development Plan 2022-2028, 'Education' use is 'Permitted in Principle'.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<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> <p>Recommendation No change to the Draft Plan.</p>

3.3 Chapter 3 – Climate Action

Issues	Sub. No.	Executive's Response & Recommendation
3.3.1 Section 3.2 Policy Context		
<p>i. Department of the Environment, Climate and Communications (DECC) recommends the following:</p> <ul style="list-style-type: none"> • update the sections regarding the National Adaptation Framework 2024 and reference the Climate Action and Low Carbon Development Act 2015 -2021. • provide an objective and / or policy in the LAP to support the implementation of CAP24 (and annual revisions thereof). • provide an objective and / or policy in the LAP to support the implementation of the new NAF and update the reference of the previous National Climate Change Adaptation Framework (2018) to the new NAF. • provide reference to, <ul style="list-style-type: none"> ◦ Shaping Our Electricity Future ◦ ESB's Networks Strategy: Networks for Net Zero <p>include policy to support the National Residential Retrofit Plan, particularly the development of the electrification of heating.</p>	B0075	<p>The Executive notes and acknowledges the issues received.</p> <p>The Climate Action and Low Carbon Development Act 2015–2021 is referred to in section 3.2 of the Draft Plan.</p> <p>It is recommended that an amendment is made to section 3.2 'Policy Context' of Chapter 3 'Climate Action' of the Draft Plan to include the following policies and frameworks,</p> <ul style="list-style-type: none"> • The National Adaptation Framework 2024 "planning for a climate resilient Ireland". • The Healthy Ireland Framework – a framework for improved health and well-being. • Delivering on the Sustainable Development Goals by 2030. • The National Residential Retrofit Plan. <p>Policies and objectives for electricity provision and net zero are already contained in Chapter 10 of the Draft Plan and in the higher-level County Development Plan 2022-2028.</p> <p>Recommendation Amend section 3.2 'Policy Context' (page 17) as follows:</p> <p>"In implementing this Draft Plan, the Council will support relevant provisions contained in the National Climate Change Adaptation Framework (2018), the National Mitigation Plan (2017), <u>the National Adaptation Framework 2024</u>, the National Climate Action Plan 2024, the National Energy and Climate Plan 2021-2030, the National Residential Retrofit Plan, dlr's Climate Action Plan 2024-2029, <u>the Healthy Ireland Framework</u>, <u>Delivering on the Sustainable Development Goals by 2030</u>,</p>

Issues	Sub. No.	Executive's Response & Recommendation
		and any Regional Decarbonisation Plan prepared on foot of commitments included in the Regional Spatial and Economic Strategy for the Eastern and Midland Region."
3.3.2 Section 3.3 Low Carbon and Climate Resilient Community		
i. The submission from EMRA recommends that Figure 7.4 Climate Strategy of the RSES should be referred to in the Draft LAP.	<u>B0044</u>	<p>The Executive notes the issue raised and considers that Figure 3.1 in Chapter 3 'Climate Action' of the Draft Plan contains similar detail in terms of climate strategy in comparison to Figure 7.4 of the RSES.</p> <p>It is also noted that the higher order dlr County Development Plan 2022-2028 in Policy Objective RSES1- 'Regional Spatial and Economic Strategy' states that,</p> <p>'It is a Policy Objective of the Council to ensure consistency with and support the achievement of the Regional Spatial Objectives (RSOs) and Regional Policy Objectives (RPOs) of the Regional Spatial and Economic Strategy.'</p> <p>Recommendation No change to the Draft Plan.</p>
ii. The Health Service Executive request that a wider climate related risk assessment should be conducted to better inform the Plan e.g., a Climate Change Risk Assessment (CCRA) and / or considerations of climate related events and infectious disease risks.	<u>B0078</u>	<p>The Executive notes the issue raising in the submission and consider that Chapter 3 'Climate Action' of the Draft Plan is considered sufficiently detailed in terms of the purpose and capability of a local area plan in relation to climate change risk assessment.</p> <p>Recommendation No change to Draft Plan.</p>
iii. The Health Service Executive request that an assessment of the "Sustainable Urban Village" should be undertaken from the perspective of structural resilience and adaptability to sudden onset and/or slow onset events and potential displacement of people within the area or into the	<u>B0078</u>	<p>The Executive notes the issue raising and considers that Chapter 3 'Climate Action' of the Draft Plan contains sufficient detail in terms of the purpose and capability of a local area plan from the perspective of structural resilience and adaptability to sudden onset and/or slow onset events.</p> <p>Recommendation</p>

Issues	Sub. No.	Executive's Response & Recommendation
area to support climate resilient community-based policies for Old Connaught.		No change to Draft Plan.
3.3.3 Section 3.2.2 dlr Climate Action Plan 2024-2029		
i. Submission from the Department of the Environment, Climate and Communications recommends that the LAP includes additional objectives and / or policies ensuring the implementation of the DLR County Council Climate Action Plan and related actions, consistency and alignment between both Plans.	<u>B0075</u>	<p>The Executive notes the issue raising and considers that Chapter 3 'Climate Action' of the Draft Plan contains sufficient details and policy to ensure the implementation of the dlr Climate Action Plan and alignment between both Plans.</p> <p>Chapter 3 of the Draft Plan includes,</p> <p>Policy OCLAP1 - 'Low Carbon and Climate Resilient Community' It is Policy to progress the development of Old Connaught as a low carbon and climate resilient community.</p> <p>Section 3.2 of Chapter 3 refers to implementing dlr's Climate Action Plan 2024-2029 and Table 3.1 indicates how each chapter of the Draft Plan will contribute to climate change adaption or mitigation.</p> <p>Recommendation No change to Draft Plan.</p>
3.3.4 Section 3.4 Climate Change Adaption and Mitigation		
i. The Health Service Executive seek clarification on what is meant by climate change measures. Submits that climate change measures include mitigation and adaptation practices which presents the opportunity for the Planning Authority to deliver health gain or a health co-benefit.	<u>B0078</u>	<p>The Executive notes the issue raised and agrees with the submission that climate change measures include mitigation and adaptation practices. It is considered that Chapter 3 'Climate Action' and the Draft Plan aims to aid in the creation of a climate resilient County.</p> <p>Recommendation No change to Draft Plan.</p>

3.4 Chapter 4 – Spatial Strategy and Site Development Frameworks

Issues	Sub. No.	Executive's Response & Recommendation
3.4.1 Section 4.2 Vision and Strategic Objectives		
<ul style="list-style-type: none"> i. Submission highlights the need for a heritage-led vision for the village which includes: a small village centre with mixed-use, appropriately scaled buildings; conservation-led design principles; and, prioritising local character, community, and the environment over large-scale housing targets. ii. Concern about the impact of new development on the character of the area. iii. Appreciates that change and development is coming, but it must take place with an appreciation of the impact that change, and development will have on people's sense of security and wellbeing. iv. Emphasises the need for development to be done sympathetically both to the residents and to the village environment currently in existence. v. Criticises the plan for aiming to retain the existing character of the area while simultaneously allowing for development numbers that would be in direct conflict with this. vi. Disappointment with lack of attempts to include preservation of the area's historic character and natural beauty. Emphasises the need for development to enhance rather than detract from the area's character and quality of life for residents. vii. Submission indicates that beautiful green landscapes are being destroyed by hundreds of new houses. viii. Highlights challenges with translating conceptual high level key structing principles into workable viable layouts for future planning applications. ix. Contends that the LAP will result in the destruction of the tranquil rural setting of the area. 	<p><u>B0011</u> <u>B0013</u> <u>B0014</u> <u>B0017</u> <u>B0034</u> <u>B0042</u> <u>B0051</u> <u>B0060</u> <u>B0064</u> <u>B0068</u> <u>B0072</u> <u>B0080</u></p>	<p>The Executive notes the issues raised.</p> <p>Old Connaught is included in the Core Strategy of the dlr County Development Plan 2022-2028 as a 'New Residential Community'. The new community planned for Old Connaught comprises an important part of the County's future spatial growth strategy and overall residential supply. The overarching vision of the Draft Plan for Old Connaught is to support the growth of the area as a sustainable urban village with a strong sense of place and integrating both the existing and planned new communities.</p> <p>This vision is underpinned by six strategic objectives for Old Connaught provide the overarching principles to guide the future development of the area.</p> <p>One of the six strategic objectives of the Draft Plan 'Character and Heritage' sets out, <i>"To protect and enhance the existing character and heritage of Old Connaught and to integrate and manage new development in a manner which respects the areas unique historical and natural setting, whilst acknowledging the development of new communities."</i></p> <p>A further strategic objective is 'Sustainable Urban Village', <i>"To deliver a sustainable urban village at Old Connaught and provide a range of facilities and services so that the existing and new residents can access most of their day-to-day living needs within the area including housing, schools, childcare, local shops, community facilities, amenity and recreational facilities."</i></p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>x. Concern over the Draft Plan's contribution to urban sprawl.</p> <p>xi. The absence of resident protection policies in the draft plan is a failure of the Planning Authority and State Agencies to balance the interests of future stakeholders against those of the existing and would place a wholly unfair and disproportionate burden on existing homeowners.</p> <p>xii. Submission notes their property has been unfairly treated with regard to the negative impacts of construction and infrastructure delivery proximate to their home.</p> <p>xiii. All proposed development along Old Connaught Avenue should integrate into the sensitive character area of Old Connaught.</p> <p>xiv. Objects to the onerous burden placed on their lands of interest at a scale not imposed upon other landowners within the LAP boundary.</p>		<p>Chapter 4 'Spatial Strategy and Site Development Frameworks' of the Draft Plan sets out five character areas for Old Connaught and their associated individual site development frameworks.</p> <p>Section 4.4.4 'The Village Core' of the Draft Plan acknowledges that <i>'the existing village core of Old Connaught is rich in heritage and character.'</i></p> <p>One of the objectives for the Village Core development framework contained in Table 4.2 indicates,</p> <ul style="list-style-type: none"> • <i>Any development at or in proximity to the Historic Village Core to have regard to the distinct character and intrinsic qualities based on its historic built form and layout (see section 9.4.3, Chapter 9).</i> • <i>Enhance and extend the public realm setting of the Walled Gardens / Ensure that any development in proximity of the Walled Gardens protects, conserves and enhances its setting (see Objective HC1, Chapter 9)</i> <p>It is considered that the overall Draft Plan and in particular Chapters 4, Chapter 5 'Sustainable Urban Village' and Chapter 9 'Heritage and Conservation', include a range of policies and objectives which provide a masterplan framework for the development of the area whilst recognising the special character of the area and heritage rich locality.</p> <p>It is also considered that the Draft Plan has been framed in a manner that aims to be equitable in relation to the provisions of necessary supporting strategic infrastructure to sustain the development of the Old Connaught Area.</p> <p>Recommendation</p>

Issues	Sub. No.	Executive's Response & Recommendation
		No change to the Draft Plan.
<p>xv. Submissions welcome the proposal to develop a sustainable local village at Old Connaught particularly the inclusion of a Neighbourhood Centre, Open Spaces and Strategic Parks and endorses the expansion of the Old Connaught community alongside infrastructural upgrades.</p> <p>xvi. Welcomes the integration of sustainable transport planning into the vision for the area's development which aim to create a well-connected, environmentally responsible community.</p> <p>xvii. Welcomes the draft plan's focus on preserving nature, biodiversity, heritage and views.</p> <p>xviii. Endorse the vision for Old Connaught as a sustainable urban village.</p> <p>xix. Compliments the vision for the area and makes note of two elements of the vision they feel are important for the area: character and heritage; and climate and ecosystems.</p> <p>xx. Support for the building of more houses to help alleviate the housing crisis.</p>	<p><u>B0033</u> <u>B0040</u> <u>B0048</u> <u>B0054</u> <u>B0055</u> <u>B0071</u></p>	<p>The Executive notes and acknowledges the issues raised.</p> <p>Recommendation No change to Draft Plan.</p>
<p>xxi. The submission recommends that Section 4 of the Draft LAP should reference to Healthy Placemaking RPOs 9.10, 9.12 and 9.13, and Figure 9.2 Healthy Placemaking Strategy of the RSES.</p>	<p><u>B0044</u></p>	<p>The Executive notes the issues raised.</p> <p>It is considered that healthy placemaking is currently referred to and provided for in the Draft Plan in Chapters 2, 3, 4 and 8 and in that regard no further amendment is considered necessary.</p> <p>It is also noted that the higher order dlr County Development Plan 2022-2028 in Policy Objective RSES1- 'Regional Spatial and Economic Strategy' states that,</p> <p><i>'It is a Policy Objective of the Council to ensure consistency with and support the achievement of the Regional Spatial Objectives</i></p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p><i>(RSOs) and Regional Policy Objectives (RPOs) of the Regional Spatial and Economic Strategy.'</i></p> <p>Recommendation No change to the Draft Plan.</p>
3.4.2 Section 4.3.1 Land Use		
<p>i. Requests the change in land use of their property from 'Existing Built Fabric' to Residential land use for the provision of apartment developments of up to 4 storeys with an additional set back level. Notes the adjacency of land uses identified for residential development. Submits the attempt to maintain existing built fabric at this location is not considered the optimal planning design approach given the area will become so fundamentally altered and would cause physical isolation of the home in the midst of medium to high-rise apartment blocks, a new road, and Luas line.</p>	<u>B0052</u>	<p>The Executive notes the issues raised.</p> <p>The property is zoned land use objective 'A1' – <i>'To provide for new residential communities and Sustainable Neighbourhood Infrastructure in accordance with approved local area plans.'</i></p> <p>In that regard the property has a residential land use.</p> <p>In addition, Section 5.3.4.1 'Residential Density' of the Draft Plan indicates in Policy OCLAP17 – 'Plan-Led Approach to Residential Density' that,</p> <ul style="list-style-type: none"> • <i>Residential density at lands including regeneration and infill sites will be assessed on a case-by-case basis by the Planning Authority. Such sites may define their own density (as agreed by the Planning Authority) in response to inter alia the scale and form of surrounding development.</i> <p>Recommendation No change to the Draft Plan.</p>
<p>ii. Submission highlights the significant de-zoning of their land and sterilisation of the full extent of Strategic Land Reserve. Land-Use change from residential to open space and educational use within the draft LAP.</p>	<u>B0060</u>	<p>The Executive notes the issues raised and does not concur.</p> <p>The lands feature a proposed education site objective on map 14 of the higher order dlr County Development Plan 2022-2028.</p> <p>The lands have a land use zoning objective 'GB'; 'To protect and enhance the open nature of lands between urban areas' in the dlr</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>County Development Plan 2022-2028. They also feature an objective for 'Strategic Land Reserve'.</p> <p>Section 2.4.5 - 'Strategic Land Reserve' of the dlr County Development Plan 2022-2028 describes the planning reasoning for the strategic land reserve in Old Connaught and states in part,</p> <p><i>'The lands are not zoned for residential development and as such are not included in the Core Strategy for calculation purposes. Furthermore, while the subject lands are identified as a strategic land reserve it does not confer any future zoning status. Regard shall be had to this reserve in the future Old Connaught Local Area Plan.'</i></p> <p>Section 2.2.3 – 'Local Planning Policy Context' of the Draft Plan again indicates that the Strategic Land Reserve lands are zoned Objective 'GB' and not currently zoned for residential development.</p> <p>The green belt land use zoning objective allows for education and open space uses as 'permitted in principle'.</p> <p>In this regard it is not considered that the land has been de-zoned or sterilised.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>iii. Submission highlights that the Act does not provide for the downzoning of land as part of the Local Area Plan process, and if the Draft LAP is adopted as currently proposed this will in effect be the position that is being taken by the Planning Authority, with regard to the proposed land uses within Glenveagh's landholdings.</p>	<p>B0064</p>	<p>The Executive notes the issues raised.</p> <p>The Executive do not consider that the Draft Plan has the effect of downzoning lands. The Draft Plan has been framed and designed to provide a comprehensive framework for the development of the Old Connaught area that corresponds with sequential based planning and sustainable development.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		Recommendation No change to the Draft Plan.
iv. Recommends the inclusion of residential land use in the southwest corner of Glenveagh landholding in the western character area, currently zoned GB.	<u>B0064</u>	The Executive notes the issue raised. Land use zoning is set out at the County Development Plan level. A Local Area Plan must be consistent with the provisions of the County Development Plan, and therefore, such a request for a land use zoning change, whilst acknowledged, cannot be provided for within a Local Area Plan. Recommendation No change to the Draft Plan.
v. Submission notes a potential conflict between the proposed interventions around their property and areas marked in the County Development Plan to "To protect and preserve Trees and Woodlands".	<u>B0080</u>	The Executive notes the issue raised. Section 4.4.6 'The Southern Character Area' of the Draft Plan indicate in Figures 4.15 and 4.20 the objective " <i>To protect and preserve Trees and Woodlands.</i> " This indicates the incorporation of this objective in the framing of the development context for this area. When the proposed interventions are considered by way of the consent/development management process, this objective and the other objectives relating to the area will be considered in detail as consent is contemplated and decided. Recommendation No change to the Draft Plan.
vi. The submission requests that a specific local objective be provided so that a green buffer zone will be provided along the M11 Junction 5 slip road, to be extensively planted with trees and shrubs and will incorporate appropriate noise mitigation.	<u>B0080</u>	The Executive notes the issue raised. The request for a specific local objective is not considered appropriate. The consequence of including the request would be to place a burden on the owners of the area/infrastructure. The area

Issues	Sub. No.	Executive's Response & Recommendation
		<p>in question also appears to the outside the boundary of the Draft Plan.</p> <p>Recommendation No change to the Draft Plan.</p>
3.4.3 Section 4.3.2 Residential Density		
<p>i. The proposed density requirements in the draft plan are in conflict with the provisions of the Section 28 guidelines: Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024). These proposals equate to an average residential density of c. 65 dwellings per hectare at this suburban/urban extension location of a Key Town, outside of the defined Dublin City and Suburbs consolidation area but within the Dublin Metropolitan Area. The submission requests that the draft plan be consistent with strategic planning policy for sustainable residential densities in urban areas.</p>	<p>B0060</p>	<p>The Executive notes the issue raised.</p> <p>The Draft Plan was prepared with due regard to the Section 28 Guidelines, 'Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities' (2024) and relevant policies of the overarching dlr County Development Plan 2022-2028.</p> <p>Policy Objective PHP18 – 'Residential Density' of the dlr County Development Plan 2022-2028 indicates,</p> <p>It is a Policy Objective to:</p> <ul style="list-style-type: none"> • <i>Increase housing (houses and apartments) supply and promote compact urban growth through the consolidation and re-intensification of infill/brownfield sites having regard to proximity and accessibility considerations, and development management criteria set out in Chapter 12.</i> • <i>Encourage higher residential densities provided that proposals provide for high quality design and ensure a balance between the protection of existing residential amenities and the established character of the surrounding area, with the need to provide for high quality sustainable residential development.</i> <p>The Compact Settlement Guidelines include a methodology to assist Planning Authorities in integrating national planning policy in relation to residential density into statutory development plans.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>This methodology was applied in the formulation of density standards in the Draft Plan to provide a plan-led approach to residential density.</p> <p>In applying the Guidelines, the Planning Authority i) identified the applicable settlement category for Old Connaught, ii) identified the most applicable area type based within each settlement category and then iii) refined density ranges for the area. Old Connaught is identified in the Eastern Midlands Regional Assembly Regional Spatial Economic Strategy (RSES) as a component part of key town of Bray. In the Metropolitan Area Strategic Plan (MASP) of the RSES, Bray is identified as a key metropolitan town.</p> <p>The MASP indicates, that Bray is a key town and strategic development area and provides,</p> <p><i>Bray Fassaroe – westward extension of Bray at Old Connaught-Fassaroe (Dún Laoghaire) and Bray-Fassaroe (Wicklow) lands.</i></p> <p>It was then further considered that Old Connaught most closely aligns with the definition of 'Metropolitan Towns (<1,500 population) – Centre and Urban Neighbourhoods'. This category provides for a broad net density range of 50-150 dwellings per hectare.</p> <p>The density provided in the Draft Plan is indicated in Figure 4.2 and ranges from 40 dwelling units per hectare (dph) to 100 dwelling units per hectare. This is considered to be generally consistent with the policy guidance of the dlr County Development Plan 2022-2028 and the Compact Settlement Guidelines.</p> <p>Having considered the submission, the Executive has re-evaluated the applicable policy guidance and recommend that the density</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>bands in the Central Character Area are amended for the owners' lands as follows,</p> <p>70-80 dph in place of 80-100 dph 60-70 dph in place of 60-80 dph</p> <p>In addition, it is recommended that a new section be added to Chapter 4 of the Draft Plan as follows,</p> <p>4.3.4 Residential Built Form The residential built form illustrated in Figure 4.3, and further detailed in each Site Development Framework, is indicative. While Figure 4.3 provides guidance in relation to the potential future physical form of development at Old Connaught, it is acknowledged that a range of potential design solutions may be brought forward which achieve the overarching planning objectives for the lands, including notably residential density.</p> <p>It is not proposed to amend the other density ranges in the Central Character Area as requested in the submission.</p> <p>Recommendation Amend the Draft Plan as follows,</p> <p>Figure 4.2 (page 24) include density range of 70-80 dph to replace 80-100 dph and include density range of 60-70 dph to replace 60-80 dph in the legend and amend the drawing to reflect this change. See drawing 1 below.</p> <p>Add new Section 4.3.4 'Residential Built Form' (page 25)</p> <p><i>"The residential built form illustrated in Figure 4.3, and further detailed in each Site Development Framework, is indicative. While Figure 4.3 provides guidance in relation to the potential future</i></p>

Issues	Sub. No.	Executive's Response & Recommendation
		<i>physical form of development at Old Connaught, it is acknowledged that a range of potential design solutions may be brought forward which achieve the overarching planning objectives for the lands, including notably residential density."</i>







Drawing 1

Old Connaught LAP Masterplan Land Uses & Residential Densities

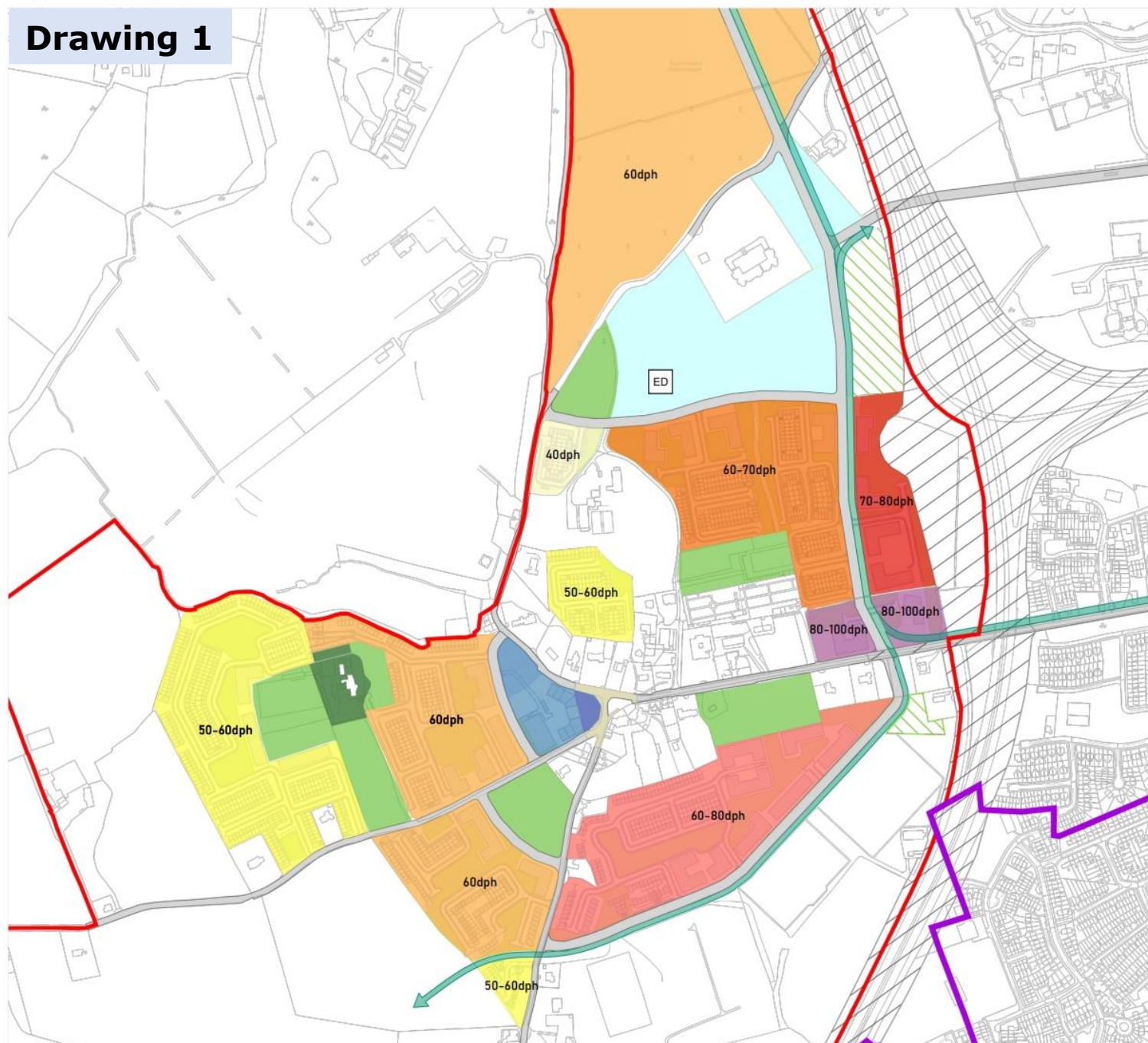
Land Uses

-  Existing Built Fabric
-  Neighbourhood Centre
-  Strategic Parks & Open Spaces
-  Local Regeneration Site
-  Active Park & School
-  N11/M11, including preferred route corridor
-  Strategic Infrastructure
-  Indicative LUAS Corridor
-  Proposed Education Site

Net Residential Density

-  Resi 40dph
-  Resi 50-60dph
-  Resi 60dph
-  Resi 60-70dph
-  Resi 60-80dph
-  Resi 70-80dph
-  Resi 80-100dph

-  LAP Boundary
-  County Boundary



Issues	Sub. No.	Executive's Response & Recommendation
<p>ii. In order to comply with the proposed densities in the draft plan, the resultant housing typology mix would be predominantly apartments. Such delivery will be heavily reliant on state subvention and support, which is uncertain due to the current geo-political climate.</p>	<p><u>B0060</u></p>	<p>The Executive notes the issue raised.</p> <p>It is considered that the proposed amendments to the density ranges in the Central Character Area and the provision of new Section 4.3.4 in the Draft Plan, as recommended by the Executive in Section 3.4.3 (i) directly above, addresses the issue raised.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>iii. Submission recommends the following amended density ranges; Plot B 40-50 dph in place of the 60 dph and Plot C 35-50 dph in place of the 60 dph in the Western Character Area.</p> <p>The submission indicates that for Plot A density range of 60-80 dph, their draft concept layout proposed can accommodate a density within the range of the Draft LAP in the Southern Character Area.</p>	<p><u>B0064</u></p>	<p>The Executive notes the issues raised and does not concur.</p> <p>The Draft Plan was prepared with due regard to the Section 28 Guidelines, 'Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities' (2024) and relevant policies of the overarching dlr County Development Plan 2022-2028.</p> <p>Policy Objective PHP18 – 'Residential Density' of the dlr County Development Plan 2022-2028 indicates,</p> <p>It is a Policy Objective to:</p> <ul style="list-style-type: none"> • <i>Increase housing (houses and apartments) supply and promote compact urban growth through the consolidation and re-intensification of infill/brownfield sites having regard to proximity and accessibility considerations, and development management criteria set out in Chapter 12.</i> • <i>Encourage higher residential densities provided that proposals provide for high quality design and ensure a balance between the protection of existing residential amenities and the established character of the surrounding area, with the need to provide for high quality sustainable residential development.</i>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>The Compact Settlement Guidelines include a methodology to assist Planning Authorities in integrating national planning policy in relation to residential density into statutory development plans. This methodology was applied in the formulation of density standards in the Draft Plan to provide a plan-led approach to residential density.</p> <p>In applying the Guidelines, the Planning Authority i) identified the applicable settlement category for Old Connaught, ii) identified the most applicable area type based within each settlement category and then iii) refined density ranges for the area. Old Connaught is identified in the Eastern Midlands Regional Assembly Regional Spatial Economic Strategy (RSES) as a component part of key town of Bray. In the Metropolitan Area Strategic Plan (MASP) of the RSES, Bray is identified as a key metropolitan town.</p> <p>The MASP indicates, that Bray is a key town and strategic development area and provides,</p> <p><i>Bray Fassaroe – westward extension of Bray at Old Connaught-Fassaroe (Dún Laoghaire) and Bray-Fassaroe (Wicklow) lands.</i></p> <p>It was then further considered that Old Connaught most closely aligns with the definition of 'Metropolitan Towns (<1,500 population) – Centre and Urban Neighbourhoods'. This category provides for a broad net density range of 50-150 dwellings per hectare.</p> <p>The density provided in the Draft Plan is indicated in Figure 4.2 and ranges from 40 dwelling units per hectare (dph) to 100 dwelling units per hectare. This is considered to be generally consistent with the policy guidance of the dlr County Development Plan 2022-2028 and the Compact Settlement Guidelines.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>Having considered the submission, the Executive considers that the applicable policy guidance has been adhered to as indicated above and are not recommending amendments to the density bands in the Western Character Area.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>iv. The lack of preferred route options and stop locations disqualifies Old Connaught from the classification of Metropolitan Town (>1,500 population) – Centre and Urban Neighbourhood' as set out in the Compact Settlement Guidelines.</p> <p>v. Designating any areas as high density in Phase A is premature without knowing the location of future Luas stops and bus routes.</p>	<p><u>B0060</u> <u>B0080</u></p>	<p>The Executive notes the issue raised.</p> <p>The Compact Settlement Guidelines include a methodology to assist Planning Authorities in integrating national planning policy in relation to residential density into statutory development plans. This methodology was applied in the formulation of density standards in the Draft Plan to provide a plan-led approach to residential density.</p> <p>In applying the Guidelines, the Planning Authority i) identified the applicable settlement category for Old Connaught, ii) identified the most applicable area type based within each settlement category and then iii) refined density ranges for the area.</p> <p>Old Connaught is identified in the Eastern Midlands Regional Assembly Regional Spatial Economic Strategy (RSES) as a component part of key town of Bray. In the Metropolitan Area Strategic Plan (MASP) of the RSES, Bray is identified as a key metropolitan town.</p> <p>The MASP indicates, that Bray is a key town and strategic development area and provides,</p> <p><i>Bray Fassaroe – westward extension of Bray at Old Connaught-Fassaroe (Dún Laoghaire) and Bray-Fassaroe (Wicklow) lands.</i></p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>It was then further considered that Old Connaught most closely aligns with the definition of 'Metropolitan Towns (<1,500 population) – Centre and Urban Neighbourhoods'.</p> <p>In refining density ranges for the area, in accordance with the Guidelines, consideration was given to proximity and accessibility to services and public transport. Based on all the above, it was considered that the Old Connaught area generally accorded with the accessibility criteria of a Metropolitan Town (>1,500 population) – 'Centre and Urban Neighbourhood' as set out in the Compact Settlement Guidelines.</p> <p>Recommendation No change to the Draft Plan.</p>
vi. The density proposed in the draft plan is too high and out of character with the area.	B0071	<p>The Executive notes the issue raised and does not concur.</p> <p>The Draft Plan was prepared with due regard to the Section 28 Guidelines, 'Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities' (2024) and relevant policies of the overarching dlr County Development Plan 2022-2028.</p> <p>Policy Objective PHP18 – 'Residential Density' of the dlr County Development Plan 2022-2028 indicates,</p> <p>It is a Policy Objective to:</p> <ul style="list-style-type: none"> • <i>Increase housing (houses and apartments) supply and promote compact urban growth through the consolidation and re-intensification of infill/brownfield sites having regard to proximity and accessibility considerations, and development management criteria set out in Chapter 12.</i> • <i>Encourage higher residential densities provided that proposals provide for high quality design and ensure a balance between the protection of existing residential</i>

Issues	Sub. No.	Executive's Response & Recommendation
		<p><i>amenities and the established character of the surrounding area, with the need to provide for high quality sustainable residential development.</i></p> <p>The Compact Settlement Guidelines include a methodology to assist Planning Authorities in integrating national planning policy in relation to residential density into statutory development plans. This methodology was applied in the formulation of density standards in the Draft Plan to provide a plan-led approach to residential density.</p> <p>In applying the Guidelines, the Planning Authority i) identified the applicable settlement category for Old Connaught, ii) identified the most applicable area type based within each settlement category and then iii) refined density ranges for the area. Old Connaught is identified in the Eastern Midlands Regional Assembly Regional Spatial Economic Strategy (RSES) as a component part of key town of Bray. In the Metropolitan Area Strategic Plan (MASP) of the RSES, Bray is identified as a key metropolitan town.</p> <p>The MASP indicates, that Bray is a key town and strategic development area and provides,</p> <p><i>Bray Fassaroe – westward extension of Bray at Old Connaught-Fassaroe (Dún Laoghaire) and Bray-Fassaroe (Wicklow) lands.</i></p> <p>It was then further considered that Old Connaught most closely aligns with the definition of 'Metropolitan Towns (<1,500 population) – Centre and Urban Neighbourhoods'. This category provides for a broad net density range of 50-150 dwellings per hectare.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>The density provided in the Draft Plan is indicated in Figure 4.2 and ranges from 40 dwelling units per hectare (dph) to 100 dwelling units per hectare. This is considered to be generally consistent with the policy guidance of the dlr County Development Plan 2022-2028 and the Compact Settlement Guidelines.</p> <p>Having considered the submission, the Executive considers that the applicable policy guidance has been adhered to as indicated above and the density proposed in the Draft Plan is generally appropriate and acceptable.</p> <p>Recommendation No change to the Draft Plan.</p>
vii. Submission requests an extension of "Objective F" zoned lands northwards and/or westwards to provide a buffer between their property and proposed infrastructure delivery.	<u>B0080</u>	<p>The Executive notes the issues raised.</p> <p>Land use zoning is set out at the County Development Plan level. A Local Area Plan must be consistent with the provisions of the County Development Plan, and therefore, such a request for a land use zoning change, whilst acknowledged and understood, cannot be provided for within a Local Area Plan.</p> <p>Recommendation No change to the Draft Plan.</p>
viii. Submission requests a Specific Local Objective (SLO) designation in the draft plan for the property to provide for buffer planting and noise screening to mitigate negative impacts of proposed transportation.	<u>B0080</u>	<p>The Executive notes the issue raised.</p> <p>The infrastructure proposed for the Old Connaught area is indicated in the Draft Plan. The transport and other infrastructure are indicated as indicative pending selection and detailed design, which has not yet been determined. It is considered more appropriate that during the detailed design and consent stage of planned infrastructure that such requests for buffer planting and noise screening would be more appropriately considered.</p> <p>Recommendation</p>

Issues	Sub. No.	Executive's Response & Recommendation
		No change to the Draft Plan.
<p>ix. Submission considers that the most dense and tall development should be located adjacent the Village Centre of the new Sustainable Settlement and secondarily adjacent proposed Luas stops once they are known.</p> <p>x. Request for information as to why highest density and height development is proposed on the County Council's own lands and not adjacent the proposed Village Centre.</p>	<u>B0080</u>	<p>The Executive notes the issues raised.</p> <p>Density ranges in the Draft Plan were considered with regard to the Section 28 Guidelines, 'Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities' (2024) and relevant policies of the overarching dlr County Development Plan 2022-2028.</p> <p>These provide for a graduated and plan-led approach to residential density. The provision of higher density ranges on the eastern side of the plan area as opposed to the village centre was based on proximity to existing services and enhancing the unique nature of the centre of Old Connaught village.</p> <p>The Draft Plan also takes a plan-led approach to building height. Building height standards were determined having regard to the Section 28 Building Height Guidelines (2018), and the dlr Building Height Strategy of the dlr County Development Plan 2022-2028 (Appendix 5). An assessment of location, character and constraints across the LAP area was undertaken and a range of urban design factors and environmental sensitivities including topography were considered.</p> <p>Recommendation No change to the Draft Plan.</p>
3.4.4 Section 4.3.3 Building Heights		
<p>i. The heights of buildings in the neighbourhood centre and western character area should take into account the axis view of Knocklinn House from Old Connaught Avenue.</p>	<u>B0005</u>	<p>The Executive notes the issue raised.</p> <p>It is considered that the Draft Plan provides for this. The proposed building heights in the neighbourhood centre are 2/3 stories and the proposed building heights in the western character area range from 2 to 4 stories.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		Recommendation No change to the Draft Plan.
ii. The building heights range of up to 4 storeys is out of scale. A two storey height limit would better align with area's village character. iii. Appreciates the need to develop the area to provide much needed housing but is concerned with housing density and building heights.	<u>B0011</u> <u>B0022</u> <u>B0030</u> <u>B0034</u>	The Executive notes the issue raised. The Draft Plan takes a plan-led approach to building height guidance. Building height standards were determined having regard to the Section 28 Building Height Guidelines (2018), and the dlr Building Height Strategy of the dlr County Development Plan 2022-2028 (Appendix 5). An assessment of location, character and constraints across the LAP area was undertaken and a range of urban design factors and environmental sensitivities including topography were considered. Section 4.3.3 and Section 5.3.4.2 'Building Heights' of the Draft Plan provide clear guidance for building heights in the Old Connaught area. Density ranges in the Draft Plan were considered with regard to the Section 28 Guidelines, 'Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities' (2024) and relevant policies of the overarching dlr County Development Plan 2022-2028. These provide for a graduated and plan-led approach to residential density. The densities proposed within the Draft Plan are generally considered to be appropriate. Recommendation No change to the Draft Plan.
iv. Concern regarding the size and building height of the proposed neighbourhood centre which could impact the character of property at Thornhill Road. Recommends the building be stepped back from the adjacent old	<u>B0014</u>	The Executive notes the issue raised. The Draft Plan takes a plan-led approach to building height guidance. Building height standards were determined having

Issues	Sub. No.	Executive's Response & Recommendation
<p>wall. Submits that any building with more than 2/3 stories would be unacceptable.</p>		<p>regard to the Section 28 Building Height Guidelines (2018), and the dlr Building Height Strategy of the dlr County Development Plan 2022-2028 (Appendix 5). An assessment of location, character and constraints across the LAP area was undertaken and a range of urban design factors and environmental sensitivities including topography were considered.</p> <p>Table 4.2 and Figure 4.8 of the Draft Plan indicate the proposed building heights in the neighbourhood centre are in the range of 2/3 stories.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>v. Apartments adjacent to the neighbourhood centre should be the same height (2/3 stories).</p>	<p><u>B0014</u></p>	<p>The Executive notes the issue raised.</p> <p>The Draft Plan takes a plan-led approach to building height guidance. Building height standards were determined having regard to the Section 28 Building Height Guidelines (2018), and the dlr Building Height Strategy of the dlr County Development Plan 2022-2028 (Appendix 5). An assessment of location, character and constraints across the LAP area was undertaken and a range of urban design factors and environmental sensitivities including topography were considered.</p> <p>The apartments proposed adjacent to the proposed neighbourhood centre are not located in close proximity to existing residential properties.</p> <p>Recommendation No change to Draft Plan.</p>
<p>vi. Building heights of 4 stories plus setback on either side of a section of Thornhill Road will cause a claustrophobic tunnel on the narrow road and suggests the building heights should be 2- 3 stories.</p>	<p><u>B0038</u></p>	<p>The Executive notes the issue raised.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>Figure 4.3 of the Draft Plan indicates proposed building heights in the Old Connaught area. The proposed building heights on either side of Thornhill Road are up to 3 stories in height.</p> <p>Recommendation No change to Draft Plan.</p>
vii. Disagrees with high apartment blocks with more than 2 floors.	<u>B0042</u>	<p>The Executive notes the issue raised.</p> <p>The Draft Plan takes a plan-led approach to building height guidance. Building height standards were determined having regard to the Section 28 Building Height Guidelines (2018), and the dlr Building Height Strategy of the dlr County Development Plan 2022-2028 (Appendix 5). An assessment of location, character and constraints across the LAP area was undertaken and a range of urban design factors and environmental sensitivities including topography were considered.</p> <p>Section 4.3.3 and Section 5.3.4.2 'Building Heights' of the Draft Plan provide clear guidance for building heights in the Old Connaught area.</p> <p>It is considered that building apartments building of the height suggested in the submission would be an unsustainable use of a land.</p> <p>Recommendation No change to Draft Plan.</p>
viii. Notes several single-storey houses in the area including nine on Thornhill Road, five on Ferndale Road, one on Ballyman Road and seven on Old Connaught Avenue.	<u>B0058</u>	<p>The Executive notes the issue raised.</p> <p>It is recommended that Section 4.3.3 of the Draft Plan be updated to reflect this.</p> <p>Recommendation Amend Section 4.3.3 (page 25) as follows:</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>"Existing building heights within the Old Connaught area are primarily two storey, with <u>some single storey residential buildings on Thornhill Road, Ferndale Road, Ballyman Road and Old Connaught Avenue as well as</u> some three storey residential buildings in the Village Core, at Old Connaught House and at Ferndale Court."</p>
<p>ix. Submission suggests the inclusion of an 'upward modifier clause' with respect to the consideration of a potential additional floor beyond the LAP indicated building heights.</p>	<p><u>B0060</u></p>	<p>The Executive notes the issue raised.</p> <p>The Draft Plan sets out a clear rationale for building height parameters which are contained in Section 4.3.3 and Section 5.3.4.2 'Building Heights' in Chapters 4 and 5.</p> <p>Policy OCLAP18 – 'Building Height' states,</p> <p><i>'It is Policy that building heights in Old Connaught shall generally be in accordance with the height parameters set out in Section 4.3.3 'Building Heights' and further detailed in Section 4.4.2 'Site Development Frameworks', both included in Chapter 4 – Spatial Strategy and Site Development Frameworks.</i></p> <p><i>Having regard to SPPR3 in the Section 28 Building Height Guidelines (2018), there may be instances where an argument can be made for increased height. In circumstances where compliance with Policy Objective BHS2 of the dlr County Development Plan 2022-2028 (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 Plan and the performance based criteria set out in Table 5.1 of the dlr Building Height Strategy (see Appendix 5 of the dlr County Development Plan 2022-2028).'</i></p> <p>It is therefore considered that the Draft Plan provides the flexibility required by the request in the submission.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		Recommendation No change to Draft Plan.
x. An unnecessarily detailed, potentially prescriptive draft LAP masterplan that is not suggestive of a DMURS compliant layout needed to deliver good quality place-making and a traffic calmed and pedestrian friendly environment.	<u>B0060</u>	<p>The Executive notes the issue raised.</p> <p>The Executive does not agree that the spatial strategy and the site development frameworks for the Draft Plan are unnecessarily detailed. The Old Connaught area is a uniquely sensitive location rich in heritage and is relatively unchanged over a long period of time. It is considered that the development of a new residential community in the area whilst considered the existing residents, that a Draft Plan needs to be abundantly clear in providing a spatial strategy for the area.</p> <p>Recommendation No change to Draft Plan.</p>
xi. Submission proposes new height strategy for their lands in the LAP and requests any final building height strategy be labelled "indicative".	<u>B0064</u>	<p>The Executive notes the issue raised.</p> <p>The Draft Plan takes a plan-led approach to building height guidance. Building height standards were determined having regard to the Section 28 Building Height Guidelines (2018), and the dlr Building Height Strategy of the dlr County Development Plan 2022-2028 (Appendix 5). An assessment of location, character and constraints across the LAP area was undertaken and a range of urban design factors and environmental sensitivities including topography were considered.</p> <p>Section 4.3.3 and Section 5.3.4.2 'Building Heights' of the Draft Plan provide clear guidance for building heights in the Old Connaught area.</p> <p>It is not proposed to amend the proposed building heights in the Southern or Western Characters areas of the Draft Plan. Tables 4.6 and 4.8 of the Draft Plan indicate that building heights are to</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>be generally in accordance with the relevant site development frameworks contained in Figures 4.17 and 4.23 for these character areas.</p> <p>Recommendation No change to Draft Plan.</p>
3.4.5 Section 4.4.3 Urban Design and Placemaking		
<p>i. All new developments should respect the existing vernacular of Old Connaught, in relation to architecture, landscaping and tree planting.</p> <p>ii. Apartment brickwork should not look like urban red-brick.</p>	<p>B0029 B0038</p>	<p>The Executive notes the issue raised and welcomes the intention of the landowner to develop the site in compliance with the Draft Plan.</p> <p>The Draft Plan provides guidance for the proper planning of the Old Connaught area and the detail of design, landscaping and finishes to proposed buildings in the Draft Plan area will be assessed and decided upon at consent/planning application stage through the development management process.</p> <p>Recommendation No change to the Draft Plan.</p>
3.4.6 Section 4.4.4 The Village Core		
<p>i. The master planning embraced best principles of place-making for the proposed new village centre.</p>	<p>B0033</p>	<p>The Executive notes and welcomes the comments.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>ii. The location choice of the proposed neighbourhood centre is at the periphery of the village core and has too many roads circulating around it. The Neighbourhood Centre should be located around a proposed open space utilising existing buildings.</p>	<p>B0049</p>	<p>The Executive notes the issue raised.</p> <p>The proposed location of the neighbourhood centre is at the heart of the existing village and will be a focal point of the village. The proposed location will provide services within reach to the entire Old Connaught area.</p> <p>Recommendation No change to the Draft Plan.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>iii. Requests that the use of "Victorian" throughout the document be reviewed as the only houses built in the Victorian period within the LAP area are the six single-storey cottages at the northern end of Thornhill Road and the five single-storey cottages on Ferndale Road.</p> <p>Notes eighteenth-century buildings including Vallombrosa, Thornhill, Graigueconna, Old Bawn, Knocklinn, Jubilee Hall (remodelled and castellated in 1812), Old Connaught House and the cottages at the western end of Old Connaught Avenue as well as walled gardens at Jubilee Hall and Festina Lente.</p> <p>Notes Old Conagh Cottage as a nineteenth century pre-Victorian build while houses such as The Ochra, Glenfield and Mayfield date from the twentieth century.</p>	B0058	<p>The Executive notes the issue raised and concurs with clarifying the wording.</p> <p>It is considered that the review of the word "Victorian" would be beneficial.</p> <p>Recommendation Amend Figure 4.7 (page 27) as follows:</p> <p>"4. Victorian <u>Eighteenth century dated</u> Walled Gardens."</p> <p>Amend Section 4.4.4 (page 28) as follows:</p> <p>"The Victorian <u>eighteenth century dated</u> walled gardens, formerly of Old Connaught House, are located via a laneway to the north of Old Connaught Avenue".</p>
<p>iv. Notes that the word "house" does not belong in Table 4.1. which refers to "Old Bawn House" and "Graigueconna House".</p>	B0058	<p>The Executive notes the issue raised and concurs to correct this wording.</p> <p>Recommendation Amend Table 4.1 (page 28) as follows:</p> <p>"Protected Structures – Graigueconna House, Old Bawn House, Graveyard, Former Entrance Walls & Piers, Walled Garden at Festina Lente."</p>
<p>v. Requests that the phrase "disused graveyard" should say "closed for burials".</p>	B0058	<p>The Executive notes the issue raised and sees the benefit in clarifying the phrase regarding graveyards.</p> <p>Recommendation Amend Section 4.4.4 (page 28) as follows:</p> <p>"To the south of Old Connaught Avenue is a medieval church (in ruin) and a disused <u>historic</u> graveyard."</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>vi. Concern with regards to proposed housing behind New Bawn House due to its negative impact regarding loss of privacy, overlooking, open space and access to surrounding land as well as quality of life and property value.</p> <p>vii. Retain access to an informal walking route behind New Bawn House which adds value to the home-owners daily life and would represent a significant loss or alternatively link the informal access route to the new proposed road network to the adjoining field.</p>	<u>B0061</u>	<p>The Executive notes the issues raised.</p> <p>The development proposed to the rear of the property in the site development framework is indicated as 2/3 storey and it is not considered that this would result in an undue loss of privacy or overlooking.</p> <p>The area to the rear of the property in the site development framework proposes new housing development, an active travel route, future proposed local public open space and permeability routes which would present new walking routes in the area.</p> <p>Recommendation No change to the Draft Plan.</p>
3.4.7 Section 4.4.5 The Central Character Area		
<p>i. Landowner of a 1.59 ha site in the Central Character area note their intention to develop the site in compliance with the LAP.</p>	<u>B0007</u>	<p>The Executive notes the issue raised and welcomes the intention of the landowner to develop the site in compliance with the Draft Plan</p> <p>Recommendation No change to the Draft Plan.</p>
<p>ii. Submission notes it should be "Cuilín", not "Cuilín House".</p>	<u>B0058</u>	<p>The Executive notes the issue raised and therefore will amend the name of the property.</p> <p>Recommendation Amend Section 4.4.5 (page 31) as follows:</p> <p>"Cuilín House Cuilín, a Protected Structure, is located in the northeast of the Character Area."</p>
<p>iii. Submission highlights the sustainable development potential of their landholding in the 'Central Character Area'. Considers the developable extent of their land for residential use to be low, representing an unsustainable</p>	<u>B0060</u>	<p>The Executive notes the issue raised.</p> <p>The lands referred to in the submission are currently indicated to be developed in the first phase of development in the Draft Plan.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>use of the scarce urban resource that is serviceable land of designated development potential.</p>		<p>Within the first phase there is a potential revised residential yield of between 790-910 new homes. The other uses proposed in this central character area are considered necessary to support the development of a new community in the Old Connaught area. The proposed uses which will provide access to services such as a new school and active park, community facilities, strategic infrastructure (primary attenuation pond) and strategic public open space.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>iv. Request to include the land, currently within the boundary of the proposed Junction 5 upgrade (as per the N11/M11 Junction 4 to 14 Improvement Scheme) in residential land use, as per figure 4.1 of the draft plan. This is to allow this land to be developed should the improvement scheme be abandoned.</p>	<p><u>B0060</u></p>	<p>The Executive notes the issue raised.</p> <p>The Section 28 Guidelines, 'Spatial Planning and National Roads' (2012) provides that Local Area Plans should identify any land required for future national road projects including objectives that:</p> <ul style="list-style-type: none"> • Retain required lands free from development; and • Ensure that measures are put in place so that any adjacent development of sensitive uses, such as housing, schools and nursing homes, are compatible with the construction and long-term operation of the road. <p>The Guidelines further provide that development objectives, including the zoning of land, must not compromise the route selection process, particularly in circumstances where road scheme planning is underway and potential route corridors or upgrades have been identified. In accordance with these Guidelines, it is policy of the Council to protect the preferred route corridor of the N11/M11 Junction 4 to Junction 14 Improvement Scheme and prohibit development that could prejudice its future delivery.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>The preferred route option for the N11/M11 Junction 4 to Junction 14 Improvement Scheme was published in 2021. At present this Scheme is suspended as the funding has not been made available to progress the project in the 2021-2025 period of the National Development Plan.</p> <p>It is considered that an amendment can be recommended for the area comprising the N11/M11, including preferred route corridor as indicated in the site development framework drawings for the central character area. It is recommended that should the scheme corridor not be required by the relevant authorities, then the area may be development for residential or other uses with proposed density and building heights ranges that may prevail to the immediate west of this area.</p> <p>Recommendation Amend Section 4.4.5.2 'Central Character Area' (page 32) of the Draft Plan as follows,</p> <p>'The following section sets out the Site Development Framework for the Central Character Area. Table 4.4 details a range of objectives that any planning application within the area will be expected to comply with (as appropriate). The objectives set out in Table 4.4 should be read in conjunction with the accompanying drawings and relevant sections referenced elsewhere in the Draft Plan. <u>If the N11/M11 Junction 4 to Junction 14 Improvement Scheme corridor in this area is not required by the relevant authorities in the future, and the area indicated as the preferred route corridor on Figures 4.11-4.14 is not to be used for other strategic infrastructure purposes, then the area may be developed for residential or other uses with similar proposed densities and building heights that may prevail to the immediate west of this area.</u></p>

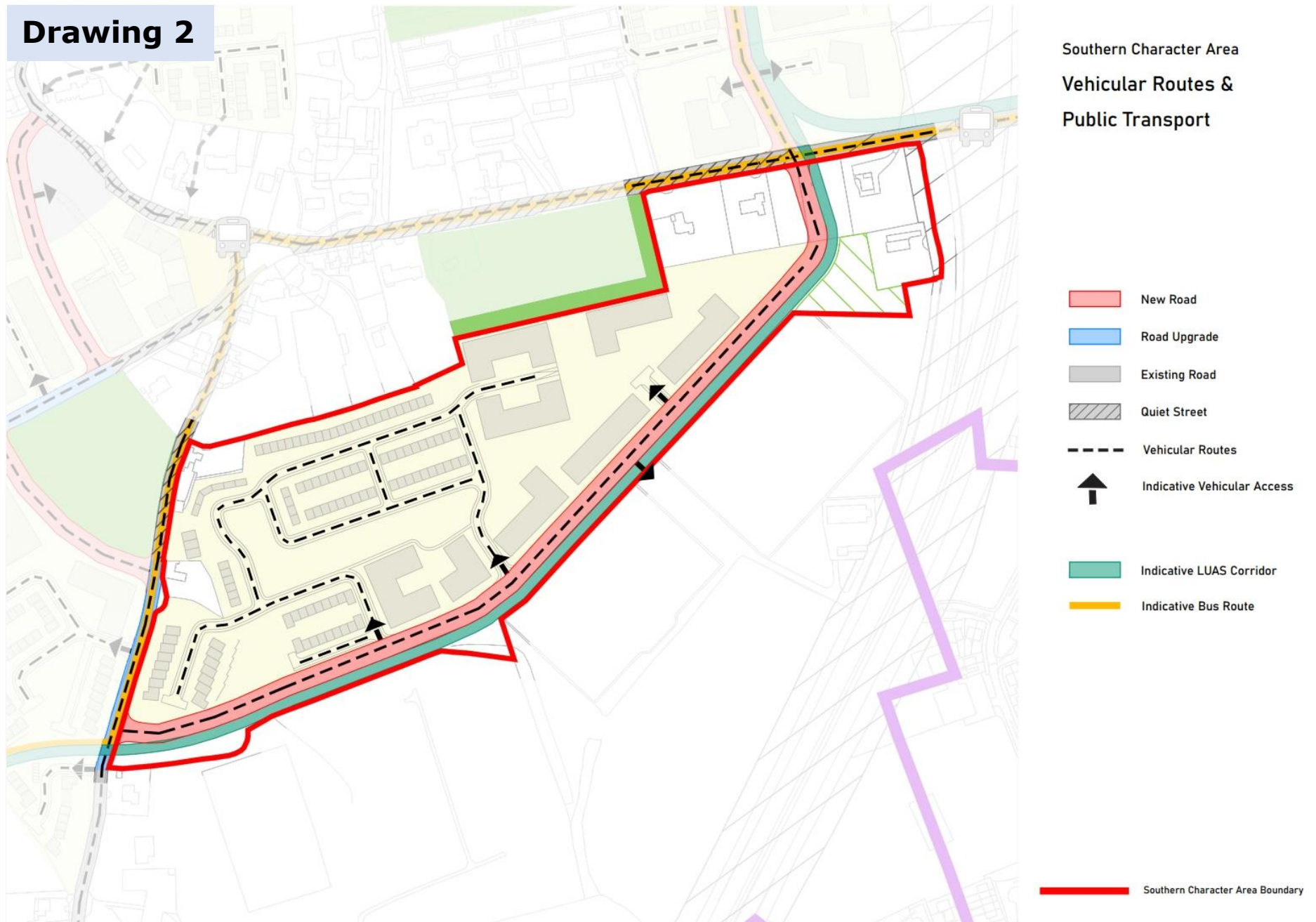
Issues	Sub. No.	Executive's Response & Recommendation
<p>v. Indicates that it is unusual for the Site Development Framework tables for each Character Area to state that, "Apartments and houses (generally in accordance with the built form illustrated in Figure 4.11)" in the draft LAP.</p>	<p>B0060</p>	<p>The Executive notes the issues raised and have made a recommendation in Section 3.4.3 (i) above that addresses this issue as follows,</p> <p>'Add new Section 4.3.4 'Residential Built Form' (page 25)</p> <p><i>The residential built form illustrated in Figure 4.3, and further detailed in each Site Development Framework, is indicative. While Figure 4.3 provides guidance in relation to the potential future physical form of development at Old Connaught, it is acknowledged that a range of potential design solutions may be brought forward which achieve the overarching planning objectives for the lands, including notably residential density.'</i></p> <p>Recommendation Add new Section 4.3.4 'Residential Built Form' (page 25)</p> <p><i>"The residential built form illustrated in Figure 4.3, and further detailed in each Site Development Framework, is indicative. While Figure 4.3 provides guidance in relation to the potential future physical form of development at Old Connaught, it is acknowledged that a range of potential design solutions may be brought forward which achieve the overarching planning objectives for the lands, including notably residential density."</i></p>
<p>vi. The submission requests a more gradual approach to density and height of proposed buildings on council land, restricting the site to maximum three storeys. Also requests a 30m buffer of development from Old Connaught Avenue for noise and residential amenity protection.</p>	<p>B0080</p>	<p>The Executive notes the issues raised.</p> <p>It is considered that the approach to buildings heights in this area and throughout the Draft Plan, is balanced and is consistent with the provisions of the dlr County Development Plan 2022-2028 and the Section 28 'Sustainable Residential Development and Compact Settlements Guidelines', 2024 prepared by Central Government. To provide development in this location at a maximum height of three storeys is not considered to be a sustainable use of land.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>It is further considered that a request for a 30 metre buffer may render the development potential of the site unfeasible.</p> <p>Recommendation No change to the Draft Plan.</p>
3.4.8 Section 4.4.6 The Southern Character Area		
<p>i. Submission requests that the village green should be expanded eastwards for use by the club for sports/recreation. Land around Jubilee Hall should be identified for residential to compensate for any loss to the area's developers. In addition, the area currently designated as strategic infrastructure located beside the ESB substation be relocated and the area be incorporated into the club's grounds.</p>	<p>B0035</p>	<p>The Executive notes the issues raised and acknowledges the significance of the club and its contribution to the area.</p> <p>Having said that, it is not considered in the interests of the proper planning of the area to either expand the village green eastward or relocate the area of strategic infrastructure beside the ESB substation.</p> <p>The area east of the village green is proposed for residential uses including existing built fabric in the Draft Plan. To extend the strategy open space that is the village green would diminish the potential residential yield for the southern character area and the overall Draft Plan.</p> <p>The ESB in their submission, support the addition of Policy OCLAP62, which safeguards the reservation of lands beside the existing substation for the provision of a 38kV substation which will ensure adequate capacity for future development. They consider that safeguarding these lands, the facilitation of efficient electricity infrastructure projects can be delivered, disruptions to local services can be minimised and sustainable development in the area can be supported.</p> <p>Recommendation No change to the Draft Plan.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>ii. Seeks the protection of a hedge row with mature native Irish oak trees in the Southern Character Area. The hedgerows are frequented by greater spotted woodpeckers, bats, foxes, hedgehogs and pheasants. Requests the homes at this location be lowered to 1-2 storey. States that tall structures will impact the sunlight on this area, impact views and root systems. Requests a substantial setback to mitigate this.</p>	<p><u>B0048</u></p>	<p>The Executive notes the issues raised.</p> <p>The location of the hedge row is noted and there is a setback proposed from it in the site development framework for this character area. The proposed building heights in the vicinity of the hedgerow are indicated as 2/3 stories and it is not proposed to reduce these.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>iii. Submission requests the provision of additional entrance from Glenveagh Plot A (Southern Character Area) to Old Connaught Avenue.</p> <p>iv. Submissions request a new entrance point to the southeast from the proposed southern distributor road.</p>	<p><u>B0035</u> <u>B0064</u></p>	<p>The Executive notes the issues raised.</p> <p>The Executive does not agree with the request for the provision of additional entrance from the Southern Character Area to Old Connaught Avenue. It is considered that the proposed southern distributor road serving this area will provide connections to Old Connaught Avenue without the need for a second vehicular access and entrance in this area.</p> <p>The Executive notes the issues raised and agrees with the requests in relation to the new entrance point to the southeast from the proposed southern distributor road and recommends an amendment to the Draft Plan in this regard.</p> <p>Recommendation Amend the Draft Plan as follows,</p> <p>To provide the potential for a proposed vehicular access,</p> <ul style="list-style-type: none"> include an Indicative Vehicular Access arrow on Figure 4.19: Southern Character Area – Vehicular Routes and Public Transport (page 36). include an Indicative Vehicular Access arrow on Figure 6.14: Proposed Vehicular Transport Network for Old Connaught (Full LAP Area) (page 65).

Issues	Sub. No.	Executive's Response & Recommendation
		include an Indicative Vehicular Access arrow on Figure 6.20: Proposed Vehicular Transport Network for Old Connaught (Primary development area) (page 71), as indicated on drawing 2 below.

Drawing 2



Issues	Sub. No.	Executive's Response & Recommendation
3.4.9 Section 4.4.7 The Western Character Area		
<p>i. The boundary between the Old Conna Golf Club and the Western Character Area contains a deep ditch with steep banks and a stream. There are a significant number of trees and woodland plants near the ditch and stream forming a barrier (between 20 - 50m in depth) to the playing area of the course.</p> <p>Request that the stream be maintained in its current form and that a barrier of 50m be provided on the Western Character area side to mirror the barrier on the Old Conna Golf Club, side in order to protect the stream which has "riparian and diversity value" as well as maximise security and safety. The inclusion of this in the Plan is to act as a guideline for developers as detailed plans are prepared.</p>	<u>B0055</u>	<p>The Executive notes the issues raised and understand the reasoning provided for the request.</p> <p>However, it is considered that the request to provide a 50 metre barrier to the southern boundary of the property would render the development potential of a significant area and length of the western character area to be unfeasible.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>ii. Requests that the use of "Victorian" throughout the document be reviewed.</p>	<u>B0058</u>	<p>The Executive notes the issue raised and concurs with clarifying the wording.</p> <p>It is considered that the review of the word "Victorian" would be beneficial.</p> <p>Recommendation Amend Section 4.4.7 (page 37) as follows:</p> <p>"Jubilee Hall, a vacant Protected Structure, is located in the north of the Character Area and comprises a large two storey Victorian <u>eighteenth century dated</u> mock-castle type house with extensive out buildings."</p>
<p>iii. Submission indicates that the Uisce Éireann wayleaves have not been taken into account in the western character area site development framework and</p>	<u>B0064</u>	<p>The Executive notes the issue raised.</p> <p>The Executive have considered the issue and examined the contents of the submission including Appendix 5. It is considered</p>

Issues	Sub. No.	Executive's Response & Recommendation
emphasises the need for reconsideration of such and to amend the site development framework.		<p>that the proposed site development framework for this character area as indicated in Figure 4.23 of the Draft Plan, can in its presently proposed form and layout, generally accommodate the Uisce Éireann wayleave in this area.</p> <p>It is also noted that the Draft Plan indicates in Section 4.4.2 – 'Site Development Frameworks' that the site development frameworks are intended to be specific enough to secure certain objectives (e.g. land use / density / active travel etc.) while flexible enough to allow a range of potential design solutions.</p> <p>However, to provide further flexibility in relation to this issue it is considered appropriate to amend the Draft Plan.</p> <p>Recommendation Amend Section 4.4.7.2 Western Character Area – Site Development Framework (page 38) as follows:</p> <p>"The following section sets out the Site Development Framework for the Western Character Area. Table 4.8 details a range of objectives that any planning application within the area will be expected to comply with (as appropriate). The objectives set out in Table 4.8 should be read in conjunction with the accompanying drawings and relevant sections referenced elsewhere in the Draft Plan. <u>A range of potential design solutions may be considered in the vicinity of the Uisce Éireann wayleave in this area.</u>"</p>
iv. Submission requests a reconfiguration of Jubilee Hall Park to incorporate discrete bungalow type older persons dwellings are allowed to the south and for the inclusion of units to the north.	B0064	<p>The Executive notes the issue raised and does not agree with the request.</p> <p>Section 8.4.1.6 - 'Jubilee Hall Park' of the Draft Plan indicates that the park will comprise a heritage based park complementing the existing grounds and structures at Jubilee Hall and it intended that the park would have distinct character areas and uses that complement the existing grounds/structures and natural</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>environment. It goes on to indicate that, '<i>a segmented approach to open space and amenity provision is proposed. Lands to the south of Jubilee Hall enjoy distinct environmental qualities including topography, views and green infrastructure. These lands provide the opportunity for a recreational setting incorporating views of the wider area set within a backdrop of mature trees and hedgerows.</i>'</p> <p>Therefore, it is not appropriate to recommend this request to incorporate bungalow type older persons dwellings.</p> <p>The submission also requests the inclusion of units to the north of Jubilee Hall. Following consideration of this request it is recommended by the Executive to amend the Draft Plan for the inclusion of units to the north of Jubilee Hall, as it is considered that the area to the north can accommodate some residential use. It is recommended that this area shall provide for contemporary mews type development. If this recommendation is accepted, the Draft Plan would need to be amended as indicated below.</p> <p>Recommendation Amend the Draft Plan as follows:</p> <p>Amend Figure 4.2 Old Connaught Masterplan – Land Use and Residential Density (page 24), by changing the strategic parks & open space land use to Resi 60dph land use. See drawing 3 below.</p> <p>Consequently, also amend Figures 4.3 (page 25), 4.23, 4.24, 4.25, 4.26 (page 39), 6.12, 6.13 (page 64), 6.14 (page 65), 6.15 (page 66), 6.18 (page 69), 6.20 (page 71), 8.2 (page 89), 10.6 (page 110) and 11.5 (page 119).</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>Amend Table 4.8: Western Character Area – Site Development Framework (page 38),</p> <p>Housing Mix - Apartments and houses. <u>Contemporary mews type development to the north of Jubilee Hall</u> (generally in accordance with the built form illustrated in Figure 4.23).</p> <p>Amend Section 8.4.6.1 Jubilee Hall Park (page 91),</p> <p>"To the north of <u>At the</u> Jubilee Hall <u>Park</u>, it is intended to explore the feasibility of providing a community garden. Community gardens have several benefits including the promotion of healthy lifestyles, biodiversity, allow for active participation in the growing of food, and include other sustainable activities. The provision of a community garden at Jubilee Hall Park will support social interaction and foster community engagement."</p>

Drawing 3



Issues	Sub No.	Executive's Response & Recommendation
3.4.10 Section 4.4.7.1 Site Potential and Design Challenges		
v. Notes that the views from the western character area are towards the Wicklow Mountains, not the Dublin Mountains.	<u>B0058</u>	<p>The Executive notes the issue raised and sees the benefit in clarifying the wording.</p> <p>Recommendation Amend Section 4.4.7.1 (page 37) as follows:</p> <p>"The lands enjoy views east towards the Irish Sea and south towards the Dublin Mountains <u>Wicklow Mountains</u>."</p>

3.5 Chapter 5 – Sustainable Urban Village

Issues	Sub. No.	Executive's Response & Recommendation
3.5.1 Section 5.2 People		
<p>i. Enquires about assessment/review of social infrastructure (education / health / childcare / emergency services) having regard to population increases. Shankill and Bray services are already under pressure.</p> <p>ii. Queries whether any audit has taken place on local service capacity and the impact of such from new development.</p>	<p><u>B0037</u> <u>B0045</u></p>	<p>The Executive notes the issues raised.</p> <p>During the preparation of the Draft Plan there was ongoing liaison with the Health Service Executive (HSE) and the Department of Education in relation to the capacity of existing services in the area and the provision of new services to serve the existing residents and proposed new community in Old Connaught.</p> <p>Both the HSE and the Department of Education provided their analysis of the Draft Plan during the public consultation period via submissions, which generally support the policies and objectives of the Draft Plan.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>iii. The submission from EMRA recommends that Chapter 5, Section 5.2 be strengthened by referring to the Healthy Placemaking Strategy (Figure 9.2) of the RSES to underpin the ambitions of the Draft Plan on integrated land use and transportation in the creation of healthy and attractive places.</p>	<p><u>B0044</u></p>	<p>The Executive notes the issues raised.</p> <p>It is considered that healthy placemaking is currently referred to and provided for in the Draft Plan in Chapter 2 'Strategic Planning Framework', Chapter 3 'Climate Action', Chapter 4 'Spatial Strategy and Site Development Frameworks' and Chapter 8 'Open Space, Parks and Recreation'. In that regard no further amendment recommended.</p> <p>Recommendation No change to the Draft Plan.</p>
3.5.2 Section 5.2.1 Sustainable Neighbourhood Infrastructure		
<p>i. Concern that only St. Kieran's Special School has been identified as sustainable neighbourhood infrastructure (SNI) as St. Gerard's School is private. Concern that the 10-minute</p>	<p><u>B0049</u></p>	<p>The Executive notes the issue raised.</p> <p>Chapter 5 'Sustainable Urban Village' of the Draft Plan sets out the policies and objectives aimed at creating, maintaining and integrating</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>neighbourhood goals can be achieved without further provision and zoning for SNI.</p>		<p>communities, neighbourhoods and residential amenities within the Old Connaught area.</p> <p>Policy OCLAP5 – 'Provision of Sustainable Neighbourhood Infrastructure Uses and Delivery of the 10-minute Neighbourhood Concept', supports the delivery of sufficient SNI uses including community and education uses.</p> <p>Objective SUV1 – 'Education Facilities', indicates to reserve lands for future education use within the Central Character Area and Northern Character Area which are identified in Figure 5.1 of the Draft Plan.</p> <p>In relation to community facilities, Policy OCLAP9 – 'New Community Facilities', aims to provide for an equitable and accessible distribution of community facilities to support the sustainable development of the Old Connaught Area. Preferred locations for the provision of community infrastructure are indicated in Figure 5.2 of the Draft Plan.</p> <p>Section 5.4 'Multi-Functional Neighbourhood Centre and Employment' of the Draft Plan provides the framework for the development of a proposed neighbourhood centre at the heart of Old Connaught which will perform an important role in providing accessible day to day retail, services, and community uses to support the existing and emerging community.</p> <p>It is therefore considered that the Draft Plan provides a framework for a comprehensive network of sustainable neighbourhood infrastructure for the development of Old Connaught.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>ii. Requests that the use of "Victorian" throughout the document be reviewed.</p>	<p><u>B0058</u></p>	<p>The Executive notes the issue raised and concurs with clarifying the wording.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>It is considered that the review of the word "Victorian" would be beneficial.</p> <p>Recommendation Amend Section 5.2.1 (page 45) as follows:</p> <p>"The <u>eighteenth century dated</u> Walled Gardens in the core of the Village comprise a focal point for community activity and engagement with local heritage and landscape."</p>
3.5.3 Section 5.2.1.1 Education		
<p>i. Submission requests that land north and west at Woodbrook College should be reserved for the expansion of the school as it is already at capacity.</p>	<p><u>B0020</u> <u>B0021</u></p>	<p>The Executive notes the issues raised.</p> <p>Woodbrook College is located outside of the Draft Plan boundary and as such it would not be appropriate to apply an objective to the lands.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>ii. Submission recommends an alternative location for the proposed education site and active park within the green belt zoned land adjacent to Thornhill Road for the proposed primary school and associated active park. Notes that this location adjacent to St. Gerard's School for better connectivity and the opportunity to share resources/facilities.</p>	<p><u>B0060</u></p>	<p>The Executive notes the issue raised.</p> <p>The Executive do not agree with the proposed alternative location. The proposed education site that's included in the Draft Plan in the Central Character Area, is consistent with the location identified in the higher order County Development Plan 2022-2028. On map 14 of the Couthy Development Plan, an objective for a proposed education site is identified at this location to the south of Allies River Road.</p> <p>This proposed location has received support from the Department of Education in their submission to the Draft Plan.</p> <p>It is considered that the relocation of the proposed education site and active park to the southwest of the Draft Plan area would remove these uses from a central location in the area to a more peripheral location in the plan area and is therefore not recommended.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>Recommendation No change to the Draft Plan.</p>
<p>iii. There is lack of commitment from the Department of Education for schools in the area.</p>	<p><u>B0063</u></p>	<p>The Executive notes the issue raised and does not concur.</p> <p>Through the Draft Plan making process, the Planning Authority had ongoing engagement with the Department of Education regarding future school requirements in the plan area and this southeast part of the County. This is evidenced in the Draft Plan in Chapter 5, Section 5.2.1.1 – 'Education'.</p> <p>As part of the preparation of this Draft Plan, the Planning Authority consulted with the Department of Education who indicated that if full build out of the Plan area were to occur, there may be a need for two primary schools in the area and potentially a need for a post primary school.</p> <p>The Department of Education in their submission to the Draft Plan note and welcome the reservation of a proposed education site to the south of Allies River Road and a second education site in the northern extents of the Plan area. They note that the second education site is for a potential future primary and post primary school and that is welcomed by the Department.</p> <p>The Departments submission concludes that they welcome the continued engagement with dlr regarded the development of both new and existing schools in the area.</p> <p>Recommendation No change to Draft Plan.</p>
<p>iv. Submission from the Department of Education raises a number of issues:</p>	<p><u>B0076</u></p>	<p>The Executive welcomes the submission from the Department of Education and notes the issues raised.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> Planned population growth figures would see the demand for primary school places increase substantially, which would place significant pressure on existing schools. In communication with dlr, the Department assessed a potential future requirement for two additional primary schools and a potential future requirement for a post primary school. The Department welcome the reservation of a proposed education site to the south of Allies River Road and a second education site in the northern extents of the Plan area. The second education site for a potential future primary and post primary school is welcomed. They note the post primary school would serve Old Connaught and adjacent growth areas. The location of either of the two proposed site reserves could be used for a future post primary school. Supports Objective SUV1 – Education Facilities. Welcomes Policy OCLAP8 – Future School Provision. Supports Objective TM28 – Safe Routes to School. There is a need for special education provision at both primary and post primary level throughout the County. The Department would welcome explicit support within the plan for the provision of school accommodation for children and young people with special educational needs. Unforeseen circumstances have the potential to put undue pressure on school place 		<p>As noted in the submission, the Department of Education (DoE) were in communication with the Planning Authority during the preparation of the Draft Plan. The Council notes the DoE's support for a range of education policies and objectives included in the Draft Plan, including Policy OCLAP8 and Objective SUV1, which state:</p> <ul style="list-style-type: none"> Policy OCLAP8 – Future School Provision It is Policy to continue to liaise with the Department of Education to progress the phased delivery of school facilities to support residential growth in the Old Connaught and wider area. Objective SUV1 – Education Facilities It is an Objective: <ul style="list-style-type: none"> To retain and/or improve existing education provision within the Draft Plan area. To reserve lands for future education use within the Central & Northern Character Area as identified in Figure 5.1. To promote the use of urban typologies in the design of any education facilities. That the dual function of sports facilities/halls etc. outside of school hours will be encouraged where the use of such facilities will be of a benefit to the wider community, however any outside hour's usage of the school should not be to the detriment of adjoining residential amenities. <p>It is considered that Policy OCLAP 8 and Objective SUV1 do not restrict the use of the lands reserved for education use in the Draft Plan to only primary or secondary level schools. The areas indicated as proposed education sites in the Draft LAP have a land use zoning 'Objective GB' – "To protect and enhance the open nature of lands between urban area". As set out in Table 13.1.6 in Chapter 13 of the County Development Plan 2022-2028, 'Education' is a use that is 'Permitted in Principle', at GB zoned lands.</p>

Issues	Sub. No.	Executive's Response & Recommendation
provision which could necessitate reassessments of school place provision.		<p>The Executive notes the Departments request for support within the Plan for the potential provision of school accommodation for children and young people with special educational needs. Objective SUV1 supports improvements to existing schools and provides provision for future education use in the Draft Plan area. It is considered that Objective SUV1 would include for the provision of special education provision and special education needs as required.</p> <p>Notwithstanding the existing policy provision in the Draft Plan, the Executive would support the Departments request, and it is recommended that Policy OCLAP8 – Future School Provision, be amended to reflect this.</p> <p>Recommendation Add the following text to Policy OCLAP8 – Future School Provision (page 46) as follows:</p> <p>"Policy OCLAP8 – Future School Provision</p> <p>It is Policy to continue to liaise with the Department of Education to progress the phased delivery of school facilities to support residential growth in the Old Connaught and wider area. <u>This includes the potential provision of school accommodation for children and young people with special educational needs.</u>"</p>
3.5.4 Section 5.2.1.2 Community Facilities		
i. Requests that the use of "Victorian" throughout the document be reviewed.	B0058	<p>The Executive notes the issue raised and concurs with clarifying the wording.</p> <p>It is considered that the review of the word "Victorian" would be beneficial.</p> <p>Recommendation Amend Section 5.2.1.2 (page 47) as follows:</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>"The Victorian <u>eighteenth century dated</u> Walled Garden in the core of the Village comprises a focal point for community activity and engagement with local heritage and landscape."</p>
3.5.5 Section 5.2.1.4 Healthcare		
<p>i. There is a lack of commitment for amenities including healthcare.</p>	<p><u>B0063</u> <u>B0066</u></p>	<p>The Executive notes the issues raised.</p> <p>During the preparation of the Draft Plan there was ongoing liaison with the HSE in relation to the capacity of existing services in the area and the provision of new services to serve the existing residents and proposed new community in Old Connaught.</p> <p>Furthermore, the following policies and objectives are contained in Chapter 5 of the Draft Plan which indicate the commitment to amenities and healthcare in the Draft Plan area.</p> <p>Policy OCLAP5 – 'Provision of Sustainable Neighbourhood Infrastructure Uses and Delivery of the 10-minute Neighbourhood Concept', supports the delivery of sufficient SNI uses including community and education uses.</p> <p>Objective SUV1 – 'Education Facilities', indicates to reserve lands for future education use within the Central Character Area and Northern Character Area which are identified in Figure 5.1 of the Draft Plan.</p> <p>In relation to community facilities, Policy OCLAP9 – 'New Community Facilities', aims to provide for an equitable and accessible distribution of community facilities to support the sustainable development of the Old Connaught Area. Preferred locations for the provision of community infrastructure are indicated in Figure 5.2 of the Draft Plan.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>Policy OCLAP12 – 'Healthcare Facilities' indicates support and facilitation of such facilities in the Draft Plan area included at lands identified for the proposed neighbourhood centre.</p> <p>Section 5.4 'Multi-Functional Neighbourhood Centre and Employment' of the Draft Plan provides the framework for the development of a proposed neighbourhood centre at the heart of Old Connaught which will perform an important role in providing accessible day to day retail, services, and community uses to support the existing and emerging community.</p> <p>In addition, the HSE provided their analysis of the Draft Plan during the public consultation period via a submission, which indicated support to the Planning Authority's for the delivery of a local area plan for Old Connaught that protects and promotes health.</p> <p>Recommendation No change to the Draft Plan.</p>
3.5.6 Section 5.3.2 Existing Home in the LAP Area and Surrounds		
i. Notes that Ferndale Court is a purpose-built apartment building instead of a converted seminary.	<u>B0058</u>	<p>The Executive notes the issue raised and concurs with clarifying the wording regarding Ferndale Court.</p> <p>Recommendation Amend Section 5.3.2 (page 49) as follows:</p> <p>"Ferndale Court, located at former seminary buildings <u>a purpose-build apartment building located</u> off the Allies River Road, comprises c. 50 no. residential units in a mix of housing typologies while Old Connaught House, a Protected Structure located off the Ferndale Road, comprises c. 43 no. apartments."</p>
ii. Notes that most dwellings along Old Connaught Avenue have good sized front gardens.	<u>B0058</u>	<p>The Executive notes the issue raised and concurs with clarifying the wording.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>Recommendation Amend Section 5.3.2 (page 49) as follows:</p> <p>"The dwellings along Old Connaught Avenue mainly front onto the roadway, with little or no front gardens, whereas the residential development along the three remaining roads, consists primarily of large, detached dwellings set back from the road."</p>
3.5.7 Section 5.3.4.3 Residential Mix		
<p>i. The submission requests that the draft plan seeks to balance the delivery of sustainable residential development and an appropriate and viable housing mix with a commensurate quantum of public open space and infrastructure across the entire LAP area, in a manner which does not unduly or disproportionately impact one landowner.</p>	<p>B0060</p>	<p>The Executive notes the issues raised.</p> <p>It is considered that the Draft Plan provides for the delivery of sustainable residential development, viable housing mix and an equitable distribution of strategic public open space and infrastructure across the overall Old Connaught area.</p> <p>The lands in question are located with the proposed first phase of development in the Draft Plan area. Within that first phase there is an initial primary sub phase which provides for up to 450 new homes that can progress utilising existing infrastructure in the area. From then on strategic infrastructure provision will be required in a sequential way to ensure infrastructure is permitted in tandem with development progressing.</p> <p>It is recommended in Section 3.4.3 (i) above of this report that a new section be added to Chapter 4 of the Draft Plan as follows,</p> <p>'4.3.4 Residential Built Form The residential built form illustrated in Figure 4.3, and further detailed in each Site Development Framework, is indicative. While Figure 4.3 provides guidance in relation to the potential future physical form of development at Old Connaught, it is acknowledged that a range of potential design solutions may be brought forward which achieve the</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>overarching planning objectives for the lands, including notably residential density.'</p> <p>The objective of this recommended additional text is to provide for a range of potential design solutions for viable housing mix.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>ii. Submission requests alteration to OCLAP19 to include the word "generally" with regard to "shall accord with the mix requirements Policy Objective PHP27". Its further noted this shall be done "either individually or cumulatively with lands located within the neighbourhood (10-minute walk) or where the proportion of own door dwellings (apartments and houses) provided is greater than 50%."</p>	<p>B0064</p>	<p>The Executive notes the issue raised.</p> <p>Policy OCLAP19 'Residential Mix' of the Draft Plan provides the policy guidance for new residential development in the Old Connaught area. It references Policy PHP27 'Housing Mix' of the higher order dlr County Development Plan 2022-2028, which does not include the word 'generally' in the policy objective. In that regard it is not considered appropriate to include the word 'generally' in Policy OCLAP19 as doing so may render it inconsistent with the provisions of the County Development Plan 2022-2028.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>3.5.8 Section 5.3.4.6 Council Owned Lands</p>		
<p>i. Notes concern over total volume of social and affordable housing without adequate services and infrastructure</p>	<p>B0080</p>	<p>The Executive notes the issues raised.</p> <p>In this regard id it considered that the overall Draft Plan and in particular Chapter 5 'Sustainable Urban Village' provide the framework for the development of a sustainable new community in Old Connaught with commensurate services, facilities and infrastructure.</p> <p>Recommendation No change to Draft Plan.</p>
<p>3.5.9 Section 5.3.4.7 Traveller Accommodation</p>		

Issues	Sub. No.	Executive's Response & Recommendation
<p>i. Refers to the indication of an expansion of Traveller Accommodation at Walcot and raises concerns of an overconcentration of such facilities in a single locality, which would lead to negative impacts. This should be reconsidered.</p>	<p><u>B0045</u></p>	<p>The Executive notes the issues raised.</p> <p>The site in question is contained in the dlr Traveller Accommodation Plan 2025-2029, in the dlr County Development Plan 2022-2028, in addition to the Draft Plan.</p> <p>Policy OCLAP22 – 'Traveller Accommodation' of the Draft Plan, states,</p> <p><i>'It is a policy to implement the dlr Traveller Accommodation Programme 2025-2029 (or any subsequent Programme), including for the provision of Traveller accommodation at Old Connaught Avenue.'</i></p> <p>The Traveller Accommodation Plan 2025-2029 was recently considered and adopted by the elected members and therefore would not be for reconsideration at present.</p> <p>Recommendation No change to Draft Plan.</p>
<p>3.5.10 Section 5.4.5 Multi-Functional Neighbourhood Centres</p>		
<p>i. Enquires about the type of shops/businesses that will be located in the neighbourhood centre. Concerns about anti-social behaviour associated with takeaway/off-license with late opening hours.</p> <p>ii. Submission states that the village core in Old Connaught should contain a sufficient mix of uses to support the new and existing community in Old Connaught.</p> <ul style="list-style-type: none"> - Medical and healthcare services (GP, physiotherapy, mental health practitioners) -- Business and professional services (legal, accounting, coworking) - Neighbourhood-scale retail (greengrocers, butchers, pharmacy) 	<p><u>B0014</u> <u>B0057</u></p>	<p>The Executive notes the issues raised.</p> <p>The Draft Plan sets out a range of uses that would generally be provided in the proposed neighbourhood centre in Section 5.4 'Multi-Functional Neighbourhood Centre and Employment' of the Draft Plan. This indicates that the future neighbourhood centre may provide for an appropriate mix of uses including, suitable retail and service uses which could include a supermarket, café/ hot food uses, hairdressers/beauticians, pharmacy and public house.</p> <p>The issue regarding proposed opening hours of premises would be addressed by way of the development management process when planning applications are submitted.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<ul style="list-style-type: none">- Cafés and modest food/hospitality venues, in keeping with village character- Artisan and cultural uses		Recommendation No change to Draft Plan.

3.6 Chapter 6 – Transport and Movement

Issues	Sub. No.	Executive's Response & Recommendation
3.6.1 Section 6.1 Introduction		
i. Transport Infrastructure Ireland (TII) recommend Section 6.1 is revised to make reference to the Area Based Transport Assessment (ABTA) in the Infrastructure Capacity Assessment Study (ICAS) Part 3 report, as follows: "This Chapter is primarily policy based. It is informed by an Area Based Transport Assessment (ABTA) which includes recommendations with regard to the proposed transport strategy for the LAP area. <i>The ABTA is set out in ICAS – Part 3 Options Development and Assessment Report which accompanies this LAP.</i> "	B0018	The Executive notes the issue raised and recommend an amendment to Section 6.1 of the Draft Plan to reflect this. Recommendation Amend Section 6.1 – Introduction (page 57) in part as follows: <i>"This Chapter is primarily policy based. It is informed by an Area Based Transport Assessment (ABTA) which includes recommendations with regard to the proposed transport strategy for the LAP area. <u>The ABTA is set out in the ICAS Part 3 'Options Development and Assessment Report' which accompanies the Draft Plan.</u>"</i>
ii. The submission from EMRA recommends that Chapter 6 of the draft plan be strengthened by considering the sustainability and efficiency of all elements of the proposed transport network, including vehicular circulation and transport infrastructure, and recognising that the Luas Green Line extension, as referred to in Figure 5.4 of the RSES, is essential to the successful implementation of the LAP and that the Luas Green Line extension is included in the phasing plan in the LAP.	B0044	The Executive notes the issues raised. It is considered that the Draft Plan, and in particular Chapters 2, 4, 6 and 11 recognises the role of Luas in the southeast of the County and Old Connaught. In Chapter 6 – 'Transport and Movement' of the Draft Plan, the following provide policy support for the Luas green line extension. Policy OCLAP27 – 'Luas Green Line Extension', <i>'It is Policy to support the extension of the Luas Green Line southwards in order to serve the Bray and Environs area.'</i> Objective TM13 – 'Green Line Luas Extension', <i>'It is an Objective to seek the extension of the Luas Green Line to serve the Old Connaught area and to actively seek the provision of Luas stops within the Draft Plan area.'</i>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>In addition, Section 11.3.7 – 'Medium/Long Term Infrastructure Upgrades', states that,</p> <p><i>'Additional infrastructure projects are not tied to the phasing strategy and are recommended to be progressed over the medium / long term, or sooner as the opportunity arises. In terms of strategic infrastructure this includes: the Luas Green Line extension to Bray; a potential busway and bridge between Old Connaught and Fassaroe; and external active travel links including the Love Lane bridge and the eastern Fassaroe connection.'</i></p> <p>The National Transport Authority Greater Dublin Area Transport Strategy 2022-2042 states that the Luas Green Line extension to Bray and Environs will take place from 2031. Notwithstanding the Draft Plan includes an indicative Luas corridor and associated reservation area.</p> <p>The above provides a rationale as to why the Luas green line extension is included in the medium/long-term phasing of the Draft Plan.</p> <p>Recommendation No change to Draft Plan.</p>
<p>iii. In relation to transport and movement, the submission states that the final LAP should consider the sustainability of all elements of the proposed transport network, including vehicular circulation and transport infrastructure, to ensure efficient movement within the LAP area, as well as linkages to the M11 (north and south) and the Key Town of Bray to minimise potential congestion.</p>	<p><u>B0044</u></p>	<p>The Executive notes the issues raised and concurs.</p> <p>It is considered that the Draft Plan considers the sustainability of all elements of the proposed transport network, including vehicular circulation and transport infrastructure.</p> <p>Recommendation No change to Draft Plan.</p>
<p>3.6.2 Section 6.3.1 Project Ireland 2040</p>		
<p>i. The Junction 5 upgrade proposals from the N11/M11 Junction 4 to Junction 14 Improvement</p>	<p><u>B0008</u> <u>B0015</u> <u>B0026</u></p>	<p>The Executive notes the issues raised.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>Scheme should be pursued by the Local Authority to:</p> <ul style="list-style-type: none"> - Allow for direct access onto M11 from Old Connaught Avenue. - Avoid an increase in vehicular movement on Thornhill Road. - Prevent the overwhelming of Junction 5 - Allow for parallel housing development for connectivity between Old Connaught, the N11, and the Dublin Road. - Provide the necessary road infrastructure for the future population before any development occurs. - Be a viable alternative to the proposed M11 overbridge. 	<p><u>B0028</u> <u>B0031</u> <u>B0036</u> <u>B0038</u> <u>B0039</u> <u>B0056</u> <u>B0062</u></p>	<p>The potential for the progression of the proposed N11/M11 Junction 4 to Junction 14 Improvement Scheme is provided for in the Draft Plan.</p> <p>Section 6.3.1 of the Draft Plan states,</p> <p><i>'As part of the N11/M11 Junction 4 to Junction 14 Improvement Scheme, the preferred route option published in 2021 indicated an upgrade of Junction 5 of the M11 to include a second roundabout on the western side of the Junction, which would allow for direct access between Old Connaught and the N11 and Dublin Road. At present this Scheme is suspended as the funding has not been made available to progress the project in the 2021-2025 period of the National Development Plan. The progression of this scheme is subject to Exchequer funding and NDP scheduling priorities. Notwithstanding, it is a policy of the Council to co-ordinate and co-operate with Transport Infrastructure Ireland, the Department of Transport, the National Transport Authority and Wicklow County Council to progress the N11/M11 Junction 4 to Junction 14 Improvement Scheme.'</i></p> <p>Therefore, there is a clear commitment in the Draft Plan for the Council to co-operate with the relevant bodies to progress the scheme albeit it is suspended at present.</p> <p>Recommendation No change to Draft Plan.</p>
<p>ii. Transport Infrastructure Ireland note the N/M11 Junction 4 to Junction 14 Improvement Scheme is suspended at present, but the N11/M11 Bus Priority Interim Scheme remains in place.</p>	<p><u>B0018</u></p>	<p>The Executive notes the issues raised.</p> <p>Recommendation No change to Draft Plan.</p>
<p>iii. The current off ramp from the N11 heading north bound provides access onto Old Connaught Avenue. There needs to be provision within the LAP to facilitate a connection to the upgrade for</p>	<p><u>B0033</u></p>	<p>The Executive notes the issues raised.</p> <p>The N/M11 Junction 4 to Junction 14 Improvement Scheme is suspended at present. Public consultation on the scheme was</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>the N11/M11 into a fully functioning interchange at Junction 5 pending its final design.</p> <p>Interactions between plans for national road upgrades and infrastructure upgrades require further clarification.</p>		<p>undertaken prior to the scheme being suspended and a preferred route option was published in 2021.</p> <p>The Draft Plan cannot at present provide for alterations to the scheme as it is suspended. In saying that, the Draft Plan does provide in Chapter 4, Figure 4.1 – 'Overarching Masterplan for Old Connaught', and elsewhere in the Draft Plan, a reservation area for the preferred route corridor for the scheme.</p> <p>Recommendation No change to Draft Plan.</p>
3.6.3 Section 6.3.3 Spatial Planning and National Roads Guidelines for Planning Authorities		
<p>i. Transport Infrastructure Ireland highlight the strategic importance of protecting the N11/M11 road for national and regional movement, and the provisions of official policy set out in Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012).</p>	B0018	<p>The Executive notes and acknowledges the issue raised.</p> <p>Recommendation No change to Draft Plan.</p>
3.6.4 Section 6.3.6 EMRA Regional Spatial and Economic Strategy		
<p>i. There is no evidence of collaboration with Bray Town/Wicklow Councils in the plan which shares the county border. Residential development at Bray near Old Connaught Avenue will impact the Dublin Road artery to Wilford roundabout.</p>	B0063 B0066	<p>The Executive notes the issues raised and does not concur.</p> <p>There has been collaboration with Wicklow County Council during the preparation of the ICAS and the preparation of the Draft Plan. When the ICAS was being prepared a project stakeholder board was established at the inception of the project. Prescribed bodies formed part of the project stakeholder board, and this included representatives from Wicklow County Council, TII and NTA.</p> <p>Recommendation No change to Draft Plan.</p>
3.6.5 Section 6.4 Area Based Transport Assessment for Old Connaught		
<p>i. Transport Infrastructure Ireland (TII) highlight their continued advocacy of evidence-based area transport assessments and acknowledges the</p>	B0018	<p>The Executive notes and acknowledges the role of TII as a stakeholder in the preparation of the ICAS.</p>

Issues	Sub. No.	Executive's Response & Recommendation
stakeholder consultation in the preparation of an Area Based Transport Assessment (ABTA) to inform the Draft Plan. TII indicate that they were a stakeholder as part of the process and positively acknowledge the finalised ICAS reports.		Recommendation No change to Draft Plan.
ii. Enquiry regarding whether transport modelling was undertaken. Any traffic studies carried out may not have taken into account the new traffic flows caused by the Herbert Road junction closure in Bray.	B0031 B0037 B0045	The Executive notes the issue raised. During the preparation of the ICAS and ABTA, traffic modelling was carried out and the Herbert Road junction was considered. It was considered that Junction 7 to the south, would be the primary alternative route for any trips that would have utilised the Herbert Road junction. Recommendation No change to Draft Plan.
iii. Requests the undertaking of a comprehensive area-based traffic study to better inform the proposed development as well as engagement with a wider stakeholder base to improve outcomes for the authorities and the communities served.	B0035	The Executive notes the issue raised. One of the assessments which informed the Draft Plan was the preparation of an Area Based Transport Assessment (ABTA). It was prepared as part of the ICAS that was undertaken for the area. It examined the most sustainable way to manage future transport demand. Chapter 6 of the Draft Plan details the main transport recommendations arising from the ABTA with a focus on walking, cycling, public transport and vehicular movement. Section 6.4 – 'Area Based Transport Assessment for Old Connaught' of the Draft Plan provides for further detail and clarity in relation to the ABTA. Given that an ABTA has been prepared it is not considered necessary to embark on the preparation of another traffic study. Recommendation No change to Draft Plan.
iv. The Area Based Transport Assessment and Infrastructure Capacity Assessment Study did not	B0049 B0057	The Executive notes the issue raised and does not concur.

Issues	Sub. No.	Executive's Response & Recommendation
<p>take into consideration the existing demand and only current population figures within the LAP area were taken into consideration for traffic models. This is inadequate as most of the traffic in the area consists of people driving into Old Connaught to locations such as St. Gerard's School and Bray Emmett's GAA Club. Recommendation for the use of Automatic Traffic Counters to establish such.</p>		<p>During the preparation of the ICAS and ABTA, traffic counts were undertaken and utilised which captured any vehicular movements through the junctions/links assessed, regardless of their origin/destination.</p> <p>Recommendation No change to Draft Plan.</p>
3.6.6 Section 6.6 Old Connaught Transport Strategy		
<p>i. Concern of the negative impacts with increasing motor traffic without sufficient traffic infrastructure, and its impact on the already heavily congested traffic conditions in the Bray area. This will place an unsustainable burden on local residents, commuters and schools.</p> <p>ii. Appreciates the need to develop the area to provide much needed housing but has concerns with regards to traffic congestion.</p> <p>iii. The proposed level of development in the LAP will significantly increase traffic through an already congested local network. Without proactive and strategic infrastructure upgrades the plan will place an unsustainable burden on local residents, commuters and schools.</p>	<p><u>B0009</u> <u>B0022</u> <u>B0026</u> <u>B0028</u> <u>B0030</u> <u>B0036</u> <u>B0039</u> <u>B0046</u> <u>B0051</u> <u>B0056</u> <u>B0062</u></p>	<p>The Executive notes the issues raised.</p> <p>The Old Connaught Transport Strategy is set out in Section 6.6 of Chapter 6 of the Draft Plan. It provides for the transport and movement policies and objectives that relation to active travel, public transport network, vehicular circulation and road and traffic management.</p> <p>It is considered the proposed transport strategy for Old Connaught provides a balanced approach to transport provision in which the needs of sustainable modes are prioritised while still accommodating necessary vehicular circulation and movement both through the area and integration as part of the wider area.</p> <p>It is considered that the level of proposed strategic transport infrastructure is extensive and necessary in order to support the scale of development planned at Old Connaught for the existing and new communities and the wider area.</p> <p>Recommendation No change to Draft Plan.</p>
<p>iv. The traffic management plan for the LAP should aim to reduce signalised junctions and improve public transport options while maintaining a car</p>	<p><u>B0026</u> <u>B0028</u> <u>B0036</u></p>	<p>The Executive notes the issues raised.</p> <p>It is considered that the traffic plan for the Draft Plan does provide for improved public transport options and a comprehensive network of new</p>

Issues	Sub. No.	Executive's Response & Recommendation
friendly road network / without restricting car usage.	B0039 B0056	<p>active travel routes. A new proposed vehicular transport network is also proposed in the Draft Plan area, and this is contained in Figure 6.20 of the Draft Plan.</p> <p>Recommendation No change to Draft Plan.</p>
<p>v. Submission recommends the alteration of figure 6.13 so that the indicative bus route does not turn west towards Ferndale Road and instead follows the indicative Luas Corridor Northwards to Crinken Lane. Recommendation notes reduced environmental impact and opportunity to connect to BusConnects Bray Corridor.</p> <p>vi. Submission recommends a spur road off the proposed North-South Link Road, as seen in figure 6.13 connecting to Ferndale Road, be moved south to be facilitated by their land. Notes topographical issues and tree retention as rationale.</p> <p>vii. Requests that further consideration be given to the adverse impact of the proposed new road along the northern boundary of Springmount House on the character, heritage, and ecosystem value of both the historical property and its surrounding landscape.</p>	B0050 B0054	<p>The Executive notes the issues raised and acknowledge the contents.</p> <p>It is noted that the location of the proposed infrastructure as referred to in the submission is indicative. In this regard Policy OCLAP33 – 'Environmental Assessment of Transport Infrastructure' states,</p> <p><i>'It is Policy that, where appropriate, proposed transport infrastructure projects, that are not already permitted or provided for by existing plans/programmes/etc. which have been subject to environmental assessment, will be subject to the undertaking of a Corridor and Route Selection Process in two stages: Stage 1 – Route Selection Identification, Evaluation and Selection; and Stage 2 - Route Selection, Evaluation and Selection. The detail associated with such projects referred to in this Draft Plan is non-binding and indicative.'</i></p> <p>It is also provided for further in the Draft Plan in Section 6.6.1 - 'Transport Strategy – Overview' which states,</p> <p><i>'When infrastructure plans and proposals in the Draft Plan are being advanced, they will be subject to a detailed a Corridor and Route Selection Process and planning consent process.'</i></p> <p>It is therefore not recommended to amend the Draft Plan as requested in the submissions.</p> <p>Recommendation No change to the Draft Plan.</p>

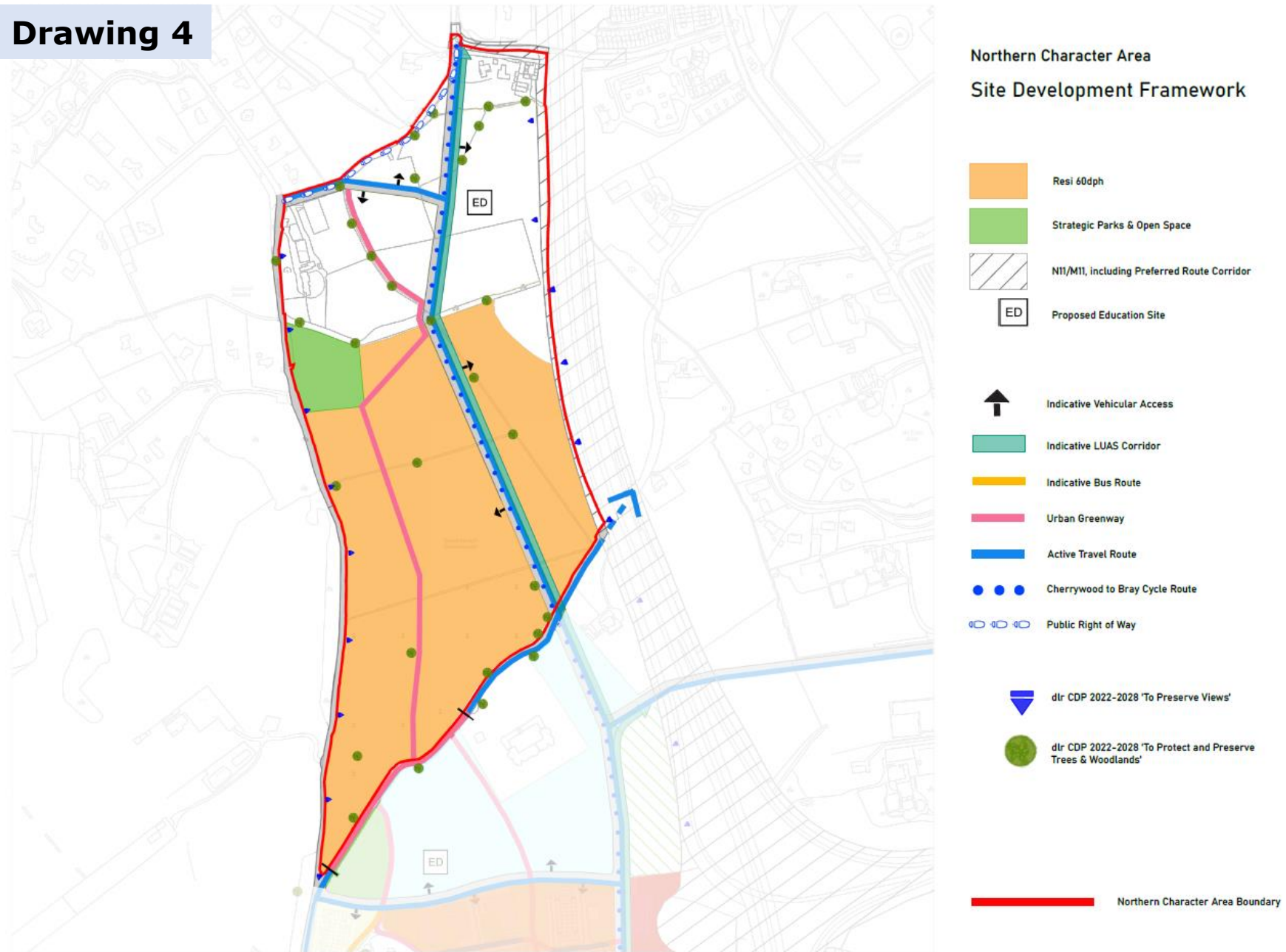
Issues	Sub. No.	Executive's Response & Recommendation
<p>viii. Submission proposes restructuring of transport network including alterations to:</p> <ul style="list-style-type: none"> - Roads/Site Access - Urban Greenways and Active Travel Routes - Permeability Locations 	<u>B0064</u>	<p>The Executive notes the issues raised and acknowledge the contents.</p> <p>It is noted that the locations of the proposed infrastructure as referred to in the submission are indicative. As stated above, in this regard Policy OCLAP33 – 'Environmental Assessment of Transport Infrastructure' and Section 6.6.1 - 'Transport Strategy – Overview' of the Draft Plan indicate that when infrastructure plans and proposals in the Draft Plan are being advanced, they will be subject to a detailed a Corridor and Route Selection Process and planning consent process.</p> <p>It is therefore recommended not to alter the Draft Plan as requested in the submission.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>ix. A balanced approach to behaviour change in transport/modal shift is necessary to ensure that investment in infrastructure is balanced with an understanding of all the factors that influence behaviour in this area.</p>	<u>B0078</u>	<p>The Executive notes the issue raised and it is considered the Draft Plan supports and advocates for change in transport and modal shift.</p> <p>Recommendation No change to the Draft Plan.</p>
3.6.7 Section 6.6.2 Active Travel Infrastructure		
<p>i. Concerns and suggestions have been submitted regarding the proposed Active Travel Connection across the M11 at Allies River Road. These include:</p> <ul style="list-style-type: none"> • Concerns about loss of privacy at Cuilín from the proposal. • The Allies River Road active travel bridge should be built in adjoining fields owned by developers. • Queries as to whether the proposed footbridge at Allies River Road will connect to the other side of Allies River Road, and what transport 	<u>B0015</u> <u>B0020</u> <u>B0021</u> <u>B0045</u> <u>B0072</u>	<p>The Executive notes the issues raised and acknowledge the contents of the submissions.</p> <p>It is noted that the location of the proposed active travel bridge as referred to in the submissions is at present indicative, albeit it would cross the M11 generally in the location indicated on Figure 6.12 – 'Proposed Active Travel Network for Old Connaught' of the Draft Plan to connect to the other side of the Allies River Road to the east.</p> <p>As stated above, in this regard Policy OCLAP33 – 'Environmental Assessment of Transport Infrastructure' and Section 6.6.1 - 'Transport Strategy – Overview' indicate that when infrastructure plans and proposals in the Draft Plan are being advanced, they will be subject to a</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>modes and timelines are being considered for the project.</p> <ul style="list-style-type: none"> Lack of mention of the Specific Objective 108 ('to reconnect the Allies River Road across the M11 for pedestrian and cyclists') despite commitments to align the draft LAP with the County Development Plan. 		<p>detailed a Corridor and Route Selection Process and planning consent process.</p> <p>The provision of this active travel bridge is included in proposed Phase C of the phasing strategy for the overall Draft Plan area and therefore the likelihood is that it may be provided later in the development cycle of the Draft Plan.</p> <p>Specific Local Objective 108 of the dlr County Development Plan 2022-2028 states,</p> <p>'To provide pedestrian/cycle access across the M11 corridor in the vicinity of Allies River Road, the corridor and route selection process outlined in Policy Objective T24 should be followed.'</p> <p>It is considered that this specific local objective is provided for in the Draft Plan by way of the provision of the active travel bridge as discussed above.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>ii. Requests the protection of the existing driveway and gateway currently connecting Festina Lente Gardens with Allies River Road, and its incorporation into a wider greenway network including connection to Shanganagh Park via the Allies River Road active travel bridge.</p>	<p><u>B0020</u> <u>B0021</u></p>	<p>The Executive notes the issue raised.</p> <p>It is considered that the request in these submissions is provided for in Figure 6.12 – 'Proposed Active Travel Network for Old Connaught' of the Draft Plan. This figure illustrates the proposed provision of active travel routes in the area referred to.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>iii. In relation to the greenway proposal:</p> <ul style="list-style-type: none"> There is a lack of clarity regarding the link between the two proposed school sites. A safe 	<p><u>B0023</u> <u>B0024</u> <u>B0025</u></p>	<p>The Executive notes the issue raised.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>path between the school sites would encourage children to be active and healthier by walking or cycling as opposed to going by car.</p> <ul style="list-style-type: none"> The proposed route involves a significant incline along the contour of Ferndale Road making it difficult to use given the steep climb and descent. If the greenway is easy, safe and useful, the number of users will increase accessibility and inclusivity. Recommends altering the alignment of the greenway by moving it eastward through the middle of the strategic land reserve, away from vehicular traffic, topographical constraints, built heritage (in the form of Springmount House) and areas with low passive surveillance. 	<p><u>B0054</u> <u>B0057</u></p>	<p>Figure 6.12 – 'Proposed Active Travel Network for Old Connaught' of the Draft Plan indicates the provision of an active travel routes linking the two proposed education sites.</p> <p>It is noted that the location of the proposed urban greenway as referred to in the submissions is indicative. As stated above, in this regard Policy OCLAP33 – 'Environmental Assessment of Transport Infrastructure' and Section 6.6.1 - 'Transport Strategy – Overview' of the Draft Plan indicate that when infrastructure plans and proposals in the Draft Plan are being advanced, they will be subject to a detailed a Corridor and Route Selection Process and planning consent process.</p> <p>Having said that, it is considered that there is scope and design and feasibility reasons in the area concerned to alter the route of the proposed urban greenway, albeit the revised proposed route will still be indicative.</p> <p>Recommendation Amend Figure 6.12 – 'Proposed Active Travel Network for Old Connaught (Full LAP Area)' (page 64) to illustrate an amended indicative route for the urban greenway adjacent to and east of Ferndale Road. See drawing 4 below.</p> <p>Also amend Figures 4.11, 4.12 and 4.29 in Chapter 4 and Figure 6.15 in Chapter 6 to be consistent with this amendment.</p>
<p>iv. Requests that further consideration be given to the challenges presented by the proposed urban greenway that traverses the centre of Springmount House such as safety and accessibility. The proposed greenway would bisect the property resulting in compromising its integrity and the diminishing of its overall value</p>	<p><u>B0037</u> <u>B0045</u> <u>B0045</u> <u>B0054</u></p>	<p>The Executive notes the issues raised and recommend amending the Draft Plan as per Section 3.6.7 (iii) directly above.</p> <p>Recommendation Amend Figure 6.12 – 'Proposed Active Travel Network for Old Connaught (Full LAP Area)' (page 64), to illustrate an amended indicative route for the urban greenway adjacent to and east of Ferndale Road. See drawing 4 below.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>as a historic residence representing a property of significant cultural and intrinsic value.</p> <p>v. Proposes an alternative urban greenway route with would provide inter alia a gentler gradient, improved accessibility, improved surveillance, linking of parks and schools, promotion of active travel, preserve the integrity of Springmount House and align with the '10 minute neighbourhood' concept. Stakeholders should be involved during detailed design.</p>		<p>Also amend Figures 4.11, 4.12 and 4.29 in Chapter 4 and Figure 6.15 in Chapter 6 to be consistent with this amendment.</p>

Drawing 4



Issues	Sub No.	Executive's Responses and Recommendations
vi. Submission from St. Gerards School welcomes proposals for improvements of active travel routes. Notes the school's endorsement of the 'Safe Routes to School Programme' that is to be supported across the Draft Plan area.	<u>B0033</u>	<p>The Executive notes and acknowledges the issue raised.</p> <p>Recommendation No change to Draft Plan.</p>
vii. Include safe cycling and pedestrian corridors at Bray Emmets GAA Club and ensure adequate parking remains for school visits, visiting teams, and large event days.	<u>B0035</u>	<p>The Executive notes the issue raised.</p> <p>It is considered that the request in the submission is provided for in Figure 6.12 – 'Proposed Active Travel Network for Old Connaught' of the Draft Plan. This figure illustrates the proposed provision of active travel routes in the area referred to including an active travel route and the strategic Cherrywood to Bray cycle route on Old Connaught Avenue outside the property entrance.</p> <p>Figure 6.12 also indicates an indicative permeability access route to the lands, with access from the proposed southern link road located northwest of the lands.</p> <p>Recommendation No change to the Draft Plan.</p>
viii. Submission raises issue with the potential severance of the site from adjacent land which would prevent the club from serving the community of existing users and facilitating the necessary growth of the club's footprint.	<u>B0035</u>	<p>The Executive notes the issue raised.</p> <p>Figure 6.12 – 'Proposed Active Travel Network for Old Connaught' of the Draft Plan indicates an indicative permeability access route to the clubs' lands with access from the proposed southern link road located northwest of the lands. This would assist in providing a connection to the southern character area of the Draft Plan area and beyond.</p> <p>In addition, it is recommended above in this report in regard to proposed amendments to Chapter 4 (including Chapter 6), to provide a new indicative vehicular access from the proposed southern link road to the clubs' lands.</p> <p>Recommendation</p>

Issues	Sub No.	Executive's Responses and Recommendations
		No change to the Draft Plan.
<p>ix. Submission requests that the village core be designated as a pedestrian priority environment with co-ordinated design elements.</p> <p>x. Submission requests that the LAP should identify the village core as the anchor of the new neighbourhood, with planning policies that protect its form and intentionally elevate its role as a civic centre to the new residents in the outer zones.</p>	B0057	<p>The Executive notes the issues raised.</p> <p>It is considered that the Draft Plan already provides for the requests as evidenced in Figure 6.15 – 'Proposed Active Travel Network for Old Connaught (Primary development area)', and in Section 4.4.4 – 'Village Core' and Figure 4.8 – 'Old Connaught Village Core Site Development Framework' in Chapter 4.</p> <p>These illustrate that the development of the proposed village core will incorporate design elements to create a pedestrian friendly environment and have it as the focal point of the area.</p> <p>Recommendation No change to Draft Plan.</p>
<p>xi. Submission highlights a permeability opportunity at the junction of Old Connaught Avenue and the laneway to Festina Lente, and requests that a provision for a CPO be included in the LAP.</p>	B0057	<p>The Executive notes the issues raised.</p> <p>It is considered that the Draft Plan already provides for this request as evidenced in Figure 6.15 – 'Proposed Active Travel Network for Old Connaught (Primary development area)', and in Section 4.4.4 – 'Village Core' and Figure 4.8 – 'Old Connaught Village Core Site Development Framework' in Chapter 4.</p> <p>These illustrate a proposed active travel route in this area.</p> <p>Recommendation No change to Draft Plan.</p>
<p>xii. Active travel connectivity to adjacent areas must be implemented to help reduce car dependency.</p>	B0062	<p>The Executive notes the issue raised.</p> <p>The Draft Plan provides for a comprehensive active travel network in the Draft Plan area and also for connections to areas adjoining the Draft Plan area, such as the strategic Cherrywood to Bray cycle route, the proposed Allies River Road active travel bridge towards Shankill and for connections to Rathmichael.</p>

Issues	Sub No.	Executive's Responses and Recommendations
		Recommendation No change to Draft Plan.
xiii. Recommends optimisation of existing infrastructure via a short-term upgrade on Old Connaught Avenue to improve active travel facilities.	<u>B0064</u>	The Executive notes the issues raised. The Draft Plan provides for a comprehensive active travel network in the Old Connaught area. It is not proposed to implement a short-term active travel upgrade to Old Connaught Avenue as it is considered more appropriate to have a plan led approach for the active travel network and not short-term implementation. Recommendation No change to Draft Plan.
xiv. Recommends a revised active travel network be published in compliance with documents such as: -DMURS -Safety and Security Assessment (SSA) - Crime Prevention Through Environmental Design (CPTED)	<u>B0070</u>	The Executive notes the issues raised. It is noted that the proposed active travel network provided for in the Draft Plan is indicative. In this regard Policy OCLAP33 – 'Environmental Assessment of Transport Infrastructure' and Section 6.6.1 - 'Transport Strategy – Overview' indicate that when plans and proposals in the Draft Plan are being advanced, they will be subject to a detailed a Corridor and Route Selection Process and planning consent process. At this stage DMURS, SSA and CPTED are likely to be part of the planning consideration. Recommendation No change to Draft Plan.
xv. Submission requests further information on footpath layouts.	<u>B0080</u>	The Executive notes the issues raised. The required level of detail is not available at local area planning level. The detail requested is available when planning applications are being prepared during the development management consenting process. Recommendation

Issues	Sub No.	Executive's Responses and Recommendations
		No change to Draft Plan.
3.6.8 Section 6.6.2.2 Cycle Parking Facilities		
i. Enquiry about the inclusion of bike libraries to encourage modal shift.	B0078	<p>The Executive notes the issues raised.</p> <p>The provision of these facilities is welcomed. It is considered that the Draft Plan facilities this by way of this policy and these objectives.</p> <p>Policy OCLAP34 – 'Cycle Parking',</p> <p><i>'It is Policy to provide high quality cycle parking and cycle storage facilities across the Old Connaught LAP area in accordance with inter alia the provisions of the dlr County Development Plan 2022-2028 and the Sustainable Residential Development and Compact Settlements Guidelines (2024).'</i></p> <p>Objective TM8 – 'Cycle Parking',</p> <p><i>'It is an Objective to:</i></p> <ul style="list-style-type: none"> <i>• Provide for safe and secure cycle parking at appropriate locations within the Draft Plan area and in particular close to the neighbourhood centre, schools, parks, recreation and community facilities and residential units.</i> <i>• Provide for the integration of cycle parking at public transport stops across the Draft Plan area.'</i> <p>Objective TM17 – 'Mobility Hubs'</p> <p><i>'It is an Objective to liaise with relevant stakeholders to establish the feasibility of providing Mobility Hubs at Old Connaught.'</i></p> <p>Recommendation No change to Draft Plan.</p>
3.6.9 Section 6.6.2.3 Public Rights-of-Way		

Issues	Sub No.	Executive's Responses and Recommendations
<p>i. Submission requests the upgrading of Maddocks Lane, an existing right of way, to provide active travel connections to Shankill.</p> <p>ii. Objects to any widening of the Crinken Lane to Ferndale Road right-of-way as such an intervention would leave their property vulnerable to crime and trespass.</p>	<p><u>B0057</u> <u>B0068</u></p>	<p>The Executive notes the issues raised.</p> <p>Objective TM9 – 'Public Right of Way' of the Draft Plan references this right of way and states,</p> <p><i>'It is an Objective to secure the retention of the established Public Right of Way connecting Crinken Lane and Ferndale Road, in accordance with Policy Objective GIB14 of the dlr County Development Plan 2022-2028.'</i></p> <p>There are no specific proposals in the Draft Plan to upgrade the right of way.</p> <p>Recommendation No change to Draft Plan.</p>
3.6.10 Section 6.6.3 Public Transport Network		
<p>i. Submissions highlight multiple sources of concern and objections regarding the proposals for, and the indicative locations of, bus gate measures along Old Connaught Avenue for reasons as follows:</p> <ul style="list-style-type: none"> • That Old Connaught Avenue will be closed to through traffic. • Bus gates should be facilitated on the Thornhill/Ballyman Road area rather than Old Connaught Avenue due to the size, width of the roads and the location of proposed housing developments. • The enforcement of the bus gate. • Access to Bray Town Centre from Old Connaught Avenue. • Reduced accessibility to Bray Emmets GAA club. • Bus Gate not included in the N11/M11 Bus Priority Scheme Drawings. 	<p><u>B0008</u> <u>B0009</u> <u>B0010</u> <u>B0011</u> <u>B0031</u> <u>B0033</u> <u>B0034</u> <u>B0038</u> <u>B0041</u> <u>B0051</u> <u>B0061</u> <u>B0062</u> <u>B0069</u> <u>B0071</u> <u>B0073</u> <u>B0080</u></p>	<p>The Executive notes the issues raised.</p> <p>As indicated in Section 6.6.3 – 'Public Transport Network' of the Draft Plan, it is intended that the proposed bus gates at Old Connaught will only be introduced after the delivery of the requisite area-wide road infrastructure to support their implementation.</p> <p>The proposals for the incorporation of the proposed bus gates along Old Connaught Avenue are to support a traffic calmed village core at Old Connaught and to provide an improved active travel environment. The proposed bus gates at Old Connaught will reduce through traffic and create an active travel and public transport priority area within Old Connaught village and along Old Connaught Avenue as far as the junction with Dublin Road. A safer active travel environment will be created by reducing overall vehicular traffic levels.</p> <p>A key benefit is that the village core will have quieter, safer roads with less traffic and an improved public realm. Outside of the Draft Plan area, the proposed bus gates will also improve accessibility to existing</p>

Issues	Sub No.	Executive's Responses and Recommendations
<ul style="list-style-type: none"> • Impact on vehicular traffic to St. Gerard's School campus is not understood due to the lack of detailed drawings. • Cut off access to M50. • Limited access to amenities including schools, golf clubs, church and funeral home. • Increased journey times. • Elongated detours to access homes. • The bus gate being a regressive step towards providing a local road network with routes north to Loughlinstown; south towards Kilmacanogue and west towards Enniskerry highlighted as being impacted. • Indicates that no viable alternative for vehicles • Requests further information on bus gate including access and timeframes. • Inability for locals to access amenities in LAP area. • Inability to exit M11 Northbound at Junction 5 and turn right towards R761 • If Bus gate is necessary, move it west to allow residents to drive over the M11 from exit ramp of Junction 5. • Increased vehicular journey time in area. • Increased wear and tear on vehicles • Increased car pollution and emissions. • Limit access to local heritage sites such as Old Connaught House. • Loss of quick access to Bray and Enniskerry. • Forcing school traffic to drive through Shankill traffic. 		<p>and proposed public transport services such as the Dart Stations at Bray and Woodbrook and the BusConnects Bray to City Centre Core Bus Corridor along Dublin Road.</p> <p>The proposed bus gates may be controlled with appropriate signage, along with traffic signalling where required.</p> <p>The result of the implementation of proposed bus gates, is that the use of private vehicles will be restricted in the village core and along a section of Old Connaught Avenue, aside from local access to properties and deliveries.</p> <p>The overall transport strategy of the Draft Plan as contained in Section 6.6, is to provide for policies and objectives for the provision of active travel, a public transport network, a vehicular circulation network and road and traffic management. This transport strategy is based on the Area Based Transport Assessment (ABTA) that was prepared to inform the preparation of the Draft Plan.</p> <p>It is considered providing this overall transport strategy will provide access to the areas adjacent to and beyond the village core by way of the proposed new road network, via public transport and an active travel network. It is not intended to prevent access for locals or others in the area. Access will be provided by way of the overall transport strategy for the Draft Plan area.</p> <p>The bus gates and their locations are at present indicative and will be subject to public consultation and an appraisal/consent process prior to their implementation. During this stage access issues from the adjoining road networks and area will be examined further, such as access off the M11.</p> <p>Recommendation No change to Draft Plan.</p>

Issues	Sub No.	Executive's Responses and Recommendations
<ul style="list-style-type: none"> Residents of Old Connaught Road need access to St Gerards's school via Old Connaught Road onto Thornhill Road. 		
<p>ii. Submissions highlight multiple proposals/requests for the bus gate to mitigate impacts and/or improve the scheme:</p> <ul style="list-style-type: none"> Allowing free flowing traffic across full proposed road network. Contraflow or traffic lights been considered on the bridge in lieu of a bus gate. Construction of a new, separate bridge beside the existing Old Connaught Avenue bridge for only bus and Luas services. Bus gate should be provided on the east side of the bridge on Old Connaught Road. Proposed bus gate could be moved to the new distributor roads. Bus Gate to be located near junction of Thornhill Road/Ballyman Road. Reconsideration of restrictions on Old Connaught Avenue or to propose a solution maintaining access to homes. Request for clarity on transport movements at Old Connaught Avenue. General revision of proposal. Planned local access should be extended to include Old Connaught House. Requests local access to Ferndale Road. 	<p><u>B0009</u> <u>B0011</u> <u>B0013</u> <u>B0022</u> <u>B0030</u> <u>B0031</u> <u>B0033</u> <u>B0034</u> <u>B0051</u> <u>B0061</u> <u>B0069</u> <u>B0071</u></p>	<p>The Executive notes the issues raised.</p> <p>The bus gate locations are indicative and will be subject to further public consultation and an appraisal/consent process prior to their implementation. It is at this stage that the location and design issues will be thoroughly examined and consulted upon.</p> <p>It is not proposed to provide a new bridge beside the existing Old Connaught Avenue bridge. It is not part of the overall transport strategy for the Old Connaught area and did not emerge as an option in the ABTA prepared for the area.</p> <p>It is intended that local access to homes on Old Connaught Avenue will be facilitated. Access to Old Connaught House, Ferndale Road and other parts of the area will be available by way of the proposed vehicular transport network and the active travel network.</p> <p>Recommendation No change to Draft Plan.</p>
<p>iii. Submissions request removing bus gate from draft plan in its entirety.</p>	<p><u>B0013</u> <u>B0041</u> <u>B0051</u> <u>B0071</u></p>	<p>The Executive notes the issues raised.</p> <p>The overall transport strategy of the Draft Plan as contained in Section 6.6, is to provide for policies and objectives for the provision of active</p>

Issues	Sub No.	Executive's Responses and Recommendations
		<p>travel, a public transport network, a vehicular circulation network and road and traffic management.</p> <p>It would not be considered appropriate or recommended to remove the bus gates from the Draft Plan as the overall transport strategy involves the provision of the bus gates. If they are removed, then the imperative to provide a traffic calmed village core at Old Connaught and to provide an improved active travel environment would be lost.</p> <p>The proposed bus gates will reduce through traffic and create an active travel and public transport priority area within Old Connaught Village and along Old Connaught Avenue as far as the junction with Dublin Road. A safer active travel environment will be created by reducing overall vehicular traffic levels. A key benefit for the village core will be quieter, safer roads with less traffic and an improved public realm.</p> <p>Therefore, it is considered that the bus gates are recommended to be retained as an integral part of the overall transport strategy from the Draft Plan, which is derived from the ABTA prepared for the area. The ABTA informed the preparation of the transport strategy for the Draft Plan.</p> <p>Recommendation No change to Draft Plan.</p>
<p>iv. Submissions highlight issues for potential LUAS delivery to LAP area including:</p> <ul style="list-style-type: none"> • LUAS be extended to Fassaroe and not cross the M11 towards Bray in the LAP area. • Alteration of Fassaroe LUAS spur due to topographical challenges adjacent to Bray Emmets GAA Club. • LUAS stop should be facilitated on the Thornhill/Ballyman Road area rather than Old Connaught Avenue due to the size, width of 	<p><u>B0009</u> <u>B0035</u> <u>B0040</u> <u>B0044</u> <u>B0062</u> <u>B0063</u> <u>B0066</u> <u>B0071</u> <u>B0080</u></p>	<p>The Executive notes the issues raised.</p> <p>The Luas corridors provided for in the Draft plan as indicated in Figure 6.18 – 'Proposed Public Transport Network for Old Connaught' are indicative corridors.</p> <p>Regarding the potential Luas spur between Old Connaught and Fassaroe, it is noted that while this is identified in the higher order dlr County Development Plan 2022-2028, it is not indicated as part of the GDA Transport Strategy 2022-2042.</p>

Issues	Sub No.	Executive's Responses and Recommendations
<p>the roads and the location of proposed housing developments.</p> <ul style="list-style-type: none"> • LUAS must be prioritised as soon as possible in the plan to reduce car dependency and included in phasing. • Submission considers that the term 'potential' for the Luas green line extension should not be used. <p>v. Submissions highlight multiple concerns regarding the proposals for LUAS provision in the LAP area including:</p> <ul style="list-style-type: none"> • LUAS will cause congestion in the area, with only pedestrian access for those disembarking on Old Connaught Avenue. • Lack of commitment from the National Transport Authority to bring the LUAS to the area. <p>vi. Submission requests further information on LUAS layouts.</p>		<p>However, in order to accord with the provisions of the County Development Plan, the Draft Plan has provided an indicative Luas corridor for the potential provision of public transport infrastructure connecting Old Connaught and Fassaroe.</p> <p>The proposed Luas Green Line extension between Bride's Glen and Bray is included in the NTA Greater Dublin Area Transport Strategy 2022-2042.</p> <p>The decision and timing of Luas routes in the Old Connaught area will be the responsibility of Transport Infrastructure Ireland. The Council has engaged with TII and NTA who are supportive, at a strategic level, of the principle of maintaining indicative Luas corridors in the Old Connaught LAP area to potentially provide for a light rail service.</p> <p>TII have indicated that the planned extension of the Luas Green Line including route alignment and locations to be served between Bride's Glen and Bray has yet to be determined and will be subject to detailed design and planning work.</p> <p>Recommendation No change to Draft Plan.</p>
<p>vii. Submission asks will existing public transport routes or service frequencies be adapted to support the new plan.</p> <p>viii. Submission enquires will new bus services be provided before the LUAS is delivered.</p> <p>ix. Submission requests further information on bus layouts.</p>	<p><u>B0037</u> <u>B0072</u> <u>B0080</u></p>	<p>The Executive notes the issue raised.</p> <p>Section 6.6.3 – 'Public Transport Network' of the Draft Plan indicates in the short to medium term, it is proposed that growth at Old Connaught will be underpinned primarily by a bus based public transport system. In the medium to long term, provision is included for the extension of the Luas network to serve the Old Connaught area. The operational elements of the future public transport system – both bus and light rail - including specific routing, frequencies, and stop locations, are subject to further assessment to be conducted by the National Transport Authority and Transport Infrastructure Ireland.</p>

Issues	Sub No.	Executive's Responses and Recommendations
		<p>The Council will engage with the relevant statutory transport authorities to encourage and facilitate the delivery of public transport infrastructure in a timely manner to support planned population growth in the Old Connaught area.</p> <p>It is envisaged that local bus routes would be high frequency over time to support planned population growth and would be provided prior to the proposed Luas Green Line extension to Bray.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>x. If the Neighbourhood Centre is built before the introduction of the bus gates it would produce unsafe road conditions for the area in the interim.</p>	<p>B0049</p>	<p>The Executive notes the issue raised.</p> <p>As stated in Section 6.6.3 – 'Public Transport Network' of the Draft Plan it is intended that the bus gates at Old Connaught will be introduced after the delivery of the requisite area-wide road infrastructure to support their implementation. Prior to the implementation of the bus gates, it is considered that access to the proposed neighbourhood centre can be facilitated by way of the vehicular road network proposed in the Draft Plan.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>xi. Figure 6.18 of the draft plan shows the indicative LUAS corridor deviating from the CDP reserved LUAS corridor.</p> <p>Submission requests that the position of the indicative LUAS corridor in figure 6.18 be reverted to the reserved LUAS corridor, as demonstrated in the CDP and ICAS.</p>	<p>B0050</p>	<p>The Executive notes the issue raised.</p> <p>It is noted that Luas corridor shown in the Draft Plan is indicative. The planned extension of the Luas Green Line including route alignment and locations to be served between Bride's Glen and Bray has yet to be determined and will be subject to detailed design and planning work.</p> <p>Notwithstanding, indicative Luas reservation corridors have been integrated and incorporated as part of the proposed transport network to serve the Draft Plan area. The Council has engaged with the NTA and</p>

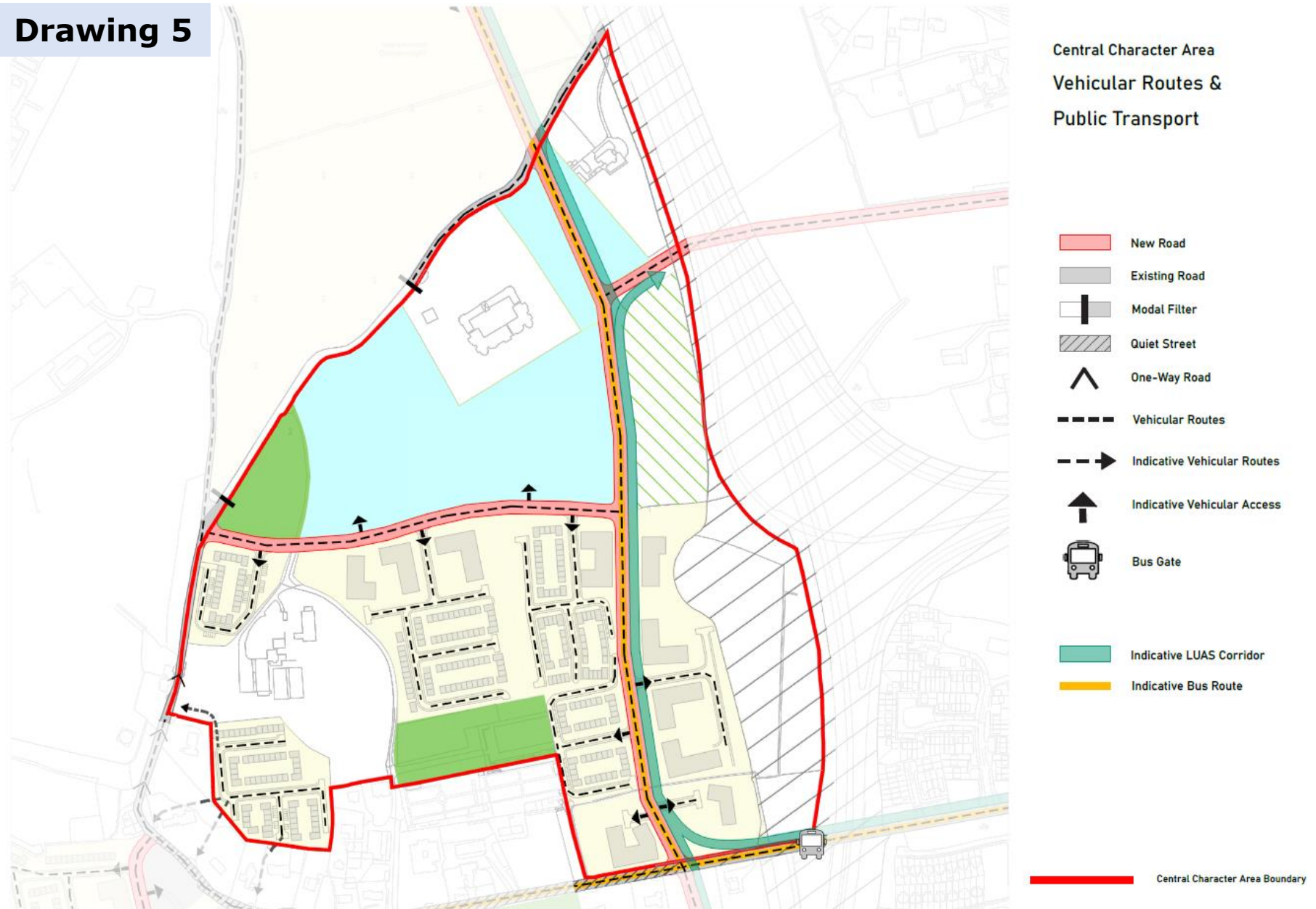
Issues	Sub No.	Executive's Responses and Recommendations
		<p>TII who are supportive, at a strategic level, of the principle of maintaining indicative Luas corridors in the Old Connaught LAP area to potentially provide for a light rail service.</p> <p>It is not recommended to amend the indicative Luas alignment indicated in the Draft Plan.</p> <p>Recommendation No change to the Draft Plan.</p>
3.6.11 Section 6.6.4 Vehicular Circulation		
<p>i. Submission requests the inclusion of further detail in relation to the proposed road network in the LAP area. Specifically, the need for clarity on travel from Ballyman Road to the M11, via Ferndale Road and Allies River Road.</p>	B0003	<p>The Executive notes the issue raised.</p> <p>The proposed vehicular transport network is comprehensively detailed in Figures 6.14 and 6.20 in Chapter 6 'Transport and Movement' of the Draft Plan.</p> <p>These figures indicate that one would travel from Ballyman Road north using the proposed new distributor roads and existing road network to join the proposed M11 overbridge and exit to the M11 via the Dublin Road and Wilford roundabout.</p> <p>The second option would be to travel south using the proposed new distributor roads to join the proposed M11 overbridge and exit to the M11 via the Dublin Road and Wilford roundabout.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>ii. Traffic going to and from Bray Emmets should be able to move around without entering the local road network.</p>	B0006	<p>The Executive notes the issue raised.</p> <p>Having regard to the overall transport strategy for the Draft Plan access to Bray Emmets will be provided via the public transport network, active travel network and the vehicular network. The existing vehicular arrangements to the club will change as a result of the proposed transport strategy for the Old Connaught area.</p>

Issues	Sub No.	Executive's Responses and Recommendations
		Recommendation No change to the Draft Plan.
<p>iii. Traffic entering the Wilford Roundabout to the "AXA" junction should be expanded from single lane to 2-3 lanes. Traffic entering the roundabout should also be allowed to take 2/3 lanes in order to access to Old Connaught Avenue, Bray Town and Woodbrook.</p> <p>iv. The proposed road network changes will increase traffic in an already congested area specifically around Dublin Road, Bray from the Wilford roundabout environs to Castle Street, Bray.</p>	<u>B0006</u> <u>B0008</u> <u>B0010</u>	<p>The Executive note the issue raised.</p> <p>Alterations to the road network referred to may be accommodated during the construction of the proposed Bray to Dublin City Centre BusConnects route or in the event of localised changes under the N11/M11 Junction 4 to Junction 14 Improvement Scheme, which is currently suspended.</p> <p>The BusConnects scheme proposes the upgrading of the Wilford roundabout to a signalised junction, increasing its vehicular capacity. The scheme also aims to reduce traffic congestion via the provision of dedicated bus and cycling infrastructure on the road. It is noted that planning permission has been granted for this scheme which is currently being challenged.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>v. Submissions outline concerns in relation to Thornhill Road as follows,</p> <ul style="list-style-type: none"> The draft plan's proposed road network will increase traffic use of Thornhill Road for rat-running to Junction 6 of the M11, and for cars avoiding traffic on the M11. This will reduce safety for active travel users. <p>vi. Submissions included recommendations as follows,</p> <ul style="list-style-type: none"> Upgrade Thornhill Road going southward to connect with the Fassaroe interchange which could require a new local road and bridge. 	<u>B0008</u> <u>B0026</u> <u>B0028</u> <u>B0031</u> <u>B0036</u> <u>B0039</u> <u>B0046</u> <u>B0056</u> <u>B0057</u> <u>B0067</u> <u>B0073</u> <u>B0074</u>	<p>The Executive notes the issues and recommendations raised.</p> <p>The proposed new distributor roads and M11 overbridge in the Draft Plan will provide a proposed new vehicular road network to travel to the M11 via Junction 5 and the Wilford roundabout.</p> <p>It is not proposed to upgrade the southern section of Thornhill Road to provide a new local road and bridge. Figure 6.13 and 6.18 of the Draft Plan indicatively demonstrate a potential future busway connection to Fassaroe as an extension of the southern distributor road.</p> <p>The installation of road signage related to commercial vehicles is noted and this is an operational issue.</p>

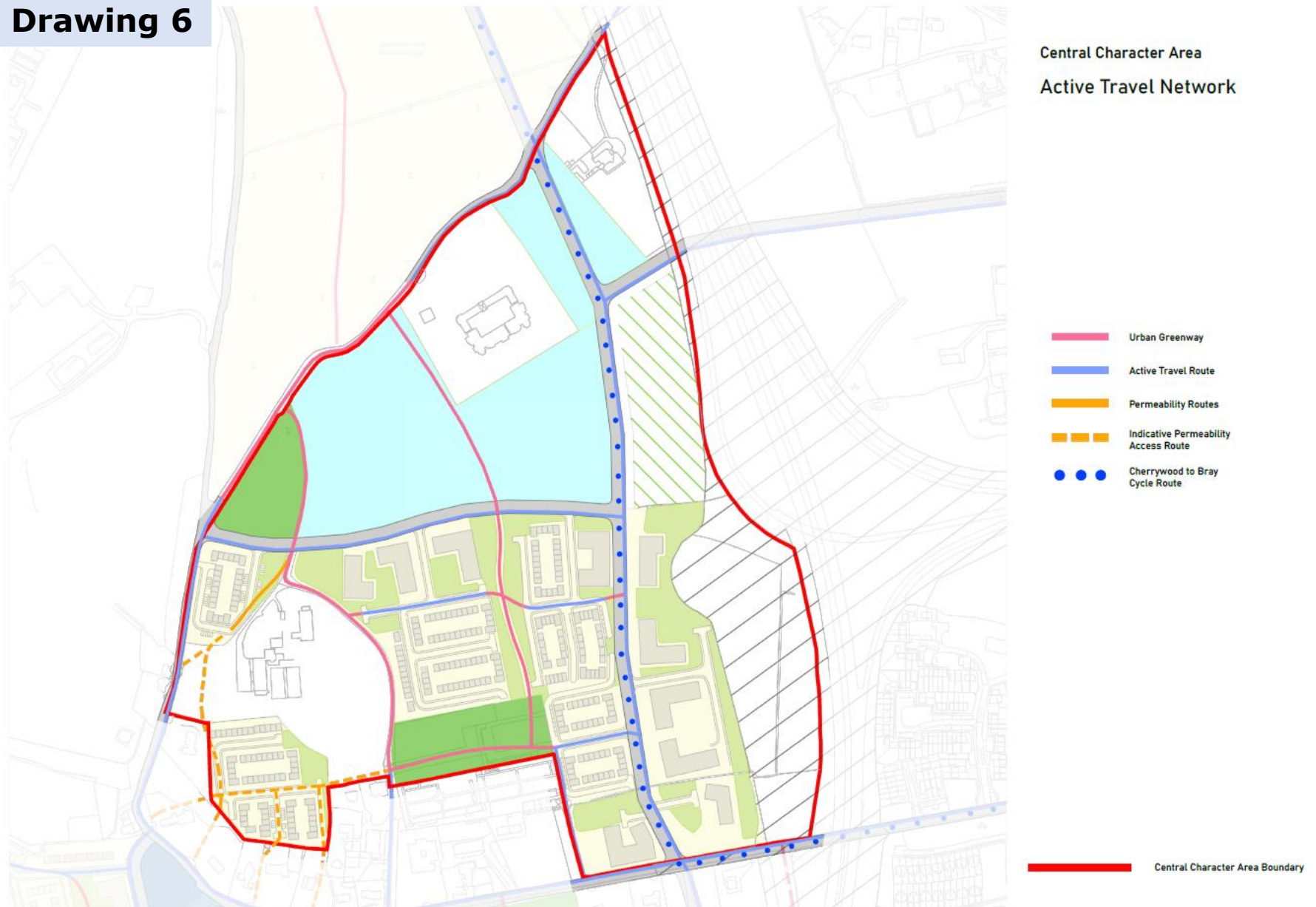
Issues	Sub No.	Executive's Responses and Recommendations
<ul style="list-style-type: none"> Restrict access to Thornhill Road, including dissuasive signage for commercial vehicles. The southern distributor road should be extended to Fassaroe as Thornhill Road is incapable of handling the traffic that will be generated by the draft plan. This extension would include a new bridge over Ballyman Valley. 		<p>Recommendation No change to the Draft Plan.</p>
<p>vii. Additional feasibility/modelling studies should be undertaken to assess anticipated volumes of traffic.</p>	<p>B0009</p>	<p>The Executive notes the issue raised.</p> <p>An Area Based Transport Assessment (ABTA) was undertaken to inform the preparation of the transport strategy for the Draft Plan. Transport modelling was undertaken as part of the ABTA.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>viii. Concerns and objections relating to proposals for one-way traffic on a portion of Ferndale Road. Negative impacts including:</p> <ul style="list-style-type: none"> Cutting off direct access to Bray, Enniskerry, the M50 and Old Connaught House. Limiting access to amenities. Lengthening of journey times Elongated detour for Old Connaught House residents returning home. Elongated detour for residents of village core. Disrupts connectivity and accessibility for residents, visitors, and service vehicles to Old Connaught House. Increased car pollution and carbon emissions Increased traffic congestion Increased risk of accidents for residents. 	<p>B0010 B0011 B0014 B0019 B0022 B0029 B0030 B0034 B0035 B0042 B0051 B0057 B0069</p>	<p>The Executive notes the issue raised and welcomes the commentary.</p> <p>It is noted in the Draft Plan, that a one-way system for vehicular movement along a portion of Ferndale Road is listed as an objective in Tables 4.2 and 4.4 and indicatively outlined in Figures 4.13, 6.14 and 6.20.</p> <p>The potential creation of one-way systems, where possible, would allow for road space reallocation for active travel infrastructure, removing the need for road widening. Such reallocation is pivotal to achieving Objective TM1 – 'Universal and Inclusive Design', which specifies that transport infrastructure within the Draft Plan area is in accordance with the Safe Routes to School (SRTS) Programme.</p> <p>Following further consideration of the submissions and re-evaluation, it is considered appropriate and recommended to amend the Draft Plan to allow two-way access and egress on the Ferndale Road to the north of the entrance to Old Connaught House. In addition, there will be a need</p>

Issues	Sub No.	Executive's Responses and Recommendations
<ul style="list-style-type: none"> Access to Bray Main Street will be difficult with the increased congestion on R761 due to new developments at Shankill and Bray. Questions if there will be a possible cul de sac on Ballyman Road near the village centre and highlights its impacts. It is unclear which roads are a one-way system. <p>ix. Submissions also highlight alterations/requests that could improve and/or mitigate impacts from proposed partial one-way system on Ferndale Road. These include:</p> <ul style="list-style-type: none"> The proposed one-way stretch of Ferndale Road should be reconfigured to allow for southbound travel from the junction of Allies River Road and the Gates of Old Connaught House. Further clarity needed about access to Ferndale Road and Old Connaught Avenue from Thornhill Road. The proposed one-way system on Ferndale Road should be extended further north to prevent the road from becoming a rat-run. <p>x. Submissions request the removal of the proposed one-way system on Ferndale Road in its entirety.</p>		<p>to amend Figures 4.11 and 4.12, 6.12 and 6.15 of the Draft Plan to provide for revised active travel measures on this portion of Ferndale Road.</p> <p>It also noted that any further northward extension of the proposed revised one-way system along Ferndale Road would not be appropriate.</p> <p>It is not proposed to remove the proposed one-way system on Ferndale Road in its entirety.</p> <p>Recommendation Amend the proposed one-way system on part of Ferndale Road to allow two-way access and egress to the vehicular entrance of Old Connaught House. See drawing 5.</p> <p>Amend Figures 4.13 (page 33), 6.14 (page 65) and 6.20 (page 71).</p> <p>In addition, amend Figures 4.11 and 4.12 (page 33), 6.12 (page 64) and 6.15 (page 66) to provide for revised active travel measures. See drawing 6.</p>

Drawing 5



Drawing 6



Issues	Sub No.	Executive's Responses and Recommendations
<p>xi. Objects to the proposed road layout with respect to the proposed bridge and new proposed east-west road along the southern boundary of Cuilín, a Protected Structure. The southern boundary view will be impeded, and the property will be viewable from the proposed bridge.</p> <p>Further concerns in relation to the location of the north-south road proposal and proposed LUAS route to the western boundary of Cuilín, due to loss of privacy. Suggests an alternative location for this proposed road to be between Ferndale Court and Ferndale Road.</p> <p>xii. Concerns that proposed travel network including LUAS and change in land uses adjacent to their property at Cuilín would cause security concerns and this should be mitigated against.</p> <p>xiii. Concern in relation to the impact of road noise and nuisance on their properties generated by the M11, from traffic travelling via the new bridge and the proposed links roads in the vicinity of the property. Queries what consideration this was given during the plan preparation process.</p> <p>xiv. Noise and air pollution will increase due to the proposed new road between Ferndale Road and N11/M50.</p>	<p><u>B0015</u> <u>B0021</u></p>	<p>The Executive notes the issues raised.</p> <p>The properties are located in an area of a conflux of proposed transport and other infrastructure in the Draft Plan area and the issues raised in this regard are acknowledged.</p> <p>It is noted that the location of this proposed infrastructure is indicative, which is indicated in Policy OCLAP33 – 'Environmental Assessment of Transport Infrastructure' which states,</p> <p><i>'It is Policy that, where appropriate, proposed transport infrastructure projects, that are not already permitted or provided for by existing plans/programmes/etc. which have been subject to environmental assessment, will be subject to the undertaking of a Corridor and Route Selection Process in two stages: Stage 1 – Route Selection Identification, Evaluation and Selection; and Stage 2 - Route Selection, Evaluation and Selection. The detail associated with such projects referred to in this Draft Plan is non-binding and indicative.'</i></p> <p>When infrastructure plans and proposals in the Draft Plan are being advanced, they will be subject to a detailed Corridor and Route Selection Process and planning consent process, which will include noise and air pollution impact assessment.</p> <p>Levels of privacy, safety and positive edges to the public realm are listed as criterion to be considered when assessing a planning application in accordance with Section 12.3.1 – 'Quality Design' of the dlr County Development Plan 2022-2028.</p> <p>Also Section 10.4 – 'Pollution' in the higher order dlr County Development Plan 2022-2028, Policy Objective EI14: 'Air and Noise Pollution' provides policy guidance for air and noise impacts, which is also applicable to the Draft Plan.</p>

Issues	Sub No.	Executive's Responses and Recommendations
		<p>In addition, more detailed standards are included in Section 12.9 'Environmental Infrastructure' in Chapter 12 'Development Management' of the County Development Plan. In this regard it is not considered necessary to duplicate the provisions of the County Development Plan in the Draft Plan.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>xv. Concern that an indicative road proposal is shown to be running through their property at Old Connaught Avenue.</p> <p>xvi. Concern about the safety of having their property facing directly onto a proposed T-Junction at Thornhill Road and requests traffic calming measures to be deployed for cars approaching the junction. Alternatively, move the proposed T-Junction and associated road south to interact more directly with Thornhill gateway and protect hedgerows.</p>	<p><u>B0017</u> <u>B0048</u></p>	<p>The Executive notes the issues raised.</p> <p>It is noted that the locations of the proposed infrastructure as referred to in the submissions are indicative. In this regard Policy OCLAP33 – 'Environmental Assessment of Transport Infrastructure' and Section - 6.6.1 'Transport Strategy – Overview' indicate that when infrastructure plans and proposals in the Draft Plan are being advanced, they will be subject to a detailed a Corridor and Route Selection Process and planning consent process.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>xvii. Submissions highlight concerns and objections to the proposed M11 overbridge, raising issues such as:</p> <ul style="list-style-type: none"> • Bridge not addressing needs of area. • Elongated journeys. • R761 and Wilford roundabout will already be heavily congested from new developments at Woodbrook and Shanganagh. • Bridge will reduce the possibility of expansion for Woodbrook school and playing pitches. <p>xviii. Provision of proposed M11 overbridge will substantially increase the capacity of the transport</p>	<p><u>B0020</u> <u>B0021</u> <u>B0062</u> <u>B0064</u> <u>B0073</u></p>	<p>The Executive notes the issue raised.</p> <p>The proposal for the M11 overbridge is a key finding of the ABTA which was carried in tandem with and to inform the preparation of the Draft Plan. The ABTA forms part of the ICAS, which itself was prepared as part of a process which included a project stakeholder board with representation from key bodies such as the NTA, TII and Wicklow County Council.</p> <p>Submissions from the TII and NTA to the Draft Plan show general support for the provisions of the overall Old Connaught Transport Strategy, as found in section 6.6, including the proposed M11 overbridge.</p>

Issues	Sub No.	Executive's Responses and Recommendations
<p>network for vehicular traffic thereby inducing additional car traffic and is of the opinion that the road is also not aligned with the principles of Road Development as established in the NTA's Greater Dublin Area Transport Strategy 2022-2042.</p>		<p>The Old Dublin Road may be subject to upgrading via the Bray to Dublin City Centre BusConnects scheme. This scheme proposes the upgrading of the Wilford roundabout to a new three-arm signal-controlled junction, increasing its vehicular capacity. The scheme also aims to reduce traffic congestion via the provision of dedicated bus and cycling infrastructure on the road. It is acknowledged that the scheme has received planning permission which is being challenged.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>xix. Concern about the protection of key routes and junctions to and from St. Gerard's school. Requests that the school remain easily accessible by car. Emphasis on the school's large catchment extending from South Wicklow to North Dublin and the importance of car borne travel to the school. Change to the road network requires scrutiny to ensure the school population can continue to access the campus by car and ensure the safety of those travelling.</p>	<p><u>B0026</u> <u>B0028</u> <u>B0033</u> <u>B0036</u> <u>B0039</u> <u>B0056</u></p>	<p>The Executive notes the issues raised.</p> <p>The proposed transport strategy for Old Connaught, as found in Section 6.6. of the Draft Plan, provides a balanced approach to transport provision in which the needs of sustainable modes are prioritised while still accommodating necessary vehicular circulation and movement both through the area and integration as part of the wider area.</p> <p>It is noted that alongside this balanced approach to sustainable transport provision, a new distributor network is proposed for vehicular traffic which will allow movement across the LAP area as illustrated in Figures 6.14 and 6.20 of the Draft Plan.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>xx. The rural nature of Ferndale Road should be maintained.</p>	<p><u>B0029</u></p>	<p>The Executive notes the request.</p> <p>It is proposed to retain the character of Ferndale Road in the Draft Plan as indicated in Tables 4.2, 4.4 and 4.10, and Objective GIB10 – 'Sylvan Character',</p>

Issues	Sub No.	Executive's Responses and Recommendations
		<p><i>'It is an Objective to preserve the sylvan and tree lined character of roads in the Draft Plan area including the Ferndale Road and Allies River Road.'</i></p> <p>Recommendation No change to the Draft Plan.</p>
<p>xxi. The N11/M11 corridor proposal would result in a 10% reduction in the Bray Emmets Grounds and loss of the primary access point. There is a lack of acknowledgement of the proposal's impact on the club in the draft LAP and the absence of offers for any form of compensation.</p>	<p>B0035</p>	<p>The Executive notes the issue raised.</p> <p>The N11/M11 Junction 4 to Junction 14 Improvement Scheme and the N11/M11 Bus Priority Interim Scheme are both within the remit of TII and the NTA.</p> <p>The preferred route corridor for the N11/M11 Junction 4 to Junction 14 Improvement scheme derives from the TII and there is an obligation on the Local Authority to allow provision for this in the Draft Plan.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>xxii. Bray's transport access is currently under strain and will worsen following the removal of the Herbert Road access due to the integration of the new bus corridor.</p>	<p>B0035</p>	<p>The Executive notes the issue raised.</p> <p>The Old Dublin Road may be subject to upgrading via the Bray to Dublin City Centre BusConnects scheme. This scheme proposes the upgrading of the Wilford Roundabout to a three-arm signalised junction, increasing its vehicular capacity. The scheme also aims to reduce traffic congestion via the provision of dedicated bus and cycling infrastructure on the road.</p> <p>The Council is aware of the plans for the N11/M11 Bus Priority Interim Scheme which is at Phase 2 Option Selection Report.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>xxiii. Clarity is needed regarding the configuration and integration of the M11's Junction 5 upgrade,</p>	<p>B0050 B0080</p>	<p>The Executive notes the issue.</p>

Issues	Sub No.	Executive's Responses and Recommendations
<p>as proposed in the N11/M11 Junction 4 to Junction 14 Improvement Scheme, and the proposed road network of the draft plan, as seen in figure 6.20.</p>		<p>As part of the N11/M11 Junction 4 to Junction 14 Improvement Scheme, the preferred route option published in 2021 indicated an upgrade of Junction 5 of the M11 to include a second roundabout on the western side of the junction, which would allow for direct access between Old Connaught and the N11 and Dublin Road (as indicated in Figure 6.1 of the Draft Plan).</p> <p>At present this scheme is suspended as the funding has not been made available to progress the project in the 2021-2025 period of the National Development Plan. The progression of this scheme is subject to Exchequer funding and NDP scheduling priorities. Notwithstanding, it is a policy of the Council to co-ordinate and co-operate with Transport Infrastructure Ireland, the Department of Transport, the National Transport Authority and Wicklow County Council to progress the N11/M11 Junction 4 to Junction 14 Improvement Scheme.</p> <p>The Section 28 Guidelines, 'Spatial Planning and National Roads' (2012) provides that Local Area Plans should identify any land required for future national road projects including objectives that:</p> <ul style="list-style-type: none"> • <i>Retain required lands free from development; and</i> • <i>Ensure that measures are put in place so that any adjacent development of sensitive uses, such as housing, schools and nursing homes, are compatible with the construction and long-term operation of the road.</i> <p>It is considered that Figure 4.2 – 'Old Connaught Masterplan – Land Use and Residential Density' and other figures in the Draft Plan demonstrates sufficient detail regarding the preferred route corridor allocated for the relevant scheme as part of the Council's obligations.</p> <p>Recommendation No change to the Draft Plan.</p>

Issues	Sub No.	Executive's Responses and Recommendations
xxiv. The boundary wall of the Old Conna Golf Club runs along Ferndale Road at the proposal for the one-way northbound system. Suggests the potential for discussions between the club and the Council regarding any changes required as a part of the traffic management requirements.	B0055	<p>The Executive notes and welcomes the issue raised.</p> <p>Having said that, the proposed one-way vehicular movement objective at Ferndale Road is at present indicative and will be subject to detailed design, public consultation and an appraisal/consent process prior to implementation.</p> <p>Recommendation No change to the Draft Plan.</p>
xxv. Recommends a more direct vehicular link between Thornhill Road and Ballyman Road.	B0064	<p>The Executive notes the issue raised.</p> <p>The proposed distributor roads network in the Draft Plan are at present indicative and will be subject to detailed design, public consultation and an appraisal/consent process prior to their implementation and in this regard no change is recommended.</p> <p>Recommendation No change to the Draft Plan.</p>
xxvi. Recommends the provision of a vehicular link between Ballyman Road and Ferndale Road.	B0064	<p>The Executive notes the issue raised.</p> <p>Figures 6.14 and 6.20 of the Draft Plan outline indicative proposals to connect Ballyman Road and Ferndale Road with a new proposed distributor road, therefore no change is recommended to the Draft Plan.</p> <p>Recommendation No change to the Draft Plan.</p>
xxvii. Woodbrook College support the Draft Plan and are actively engaging with Castlethorn and DLRCC on a planning proposal that will facilitate and support infrastructural linkages proposed.	B0065	<p>The Executive notes and acknowledges the issue raised.</p> <p>Recommendation No change to the Draft Plan.</p>
xxviii. Unintended misuse of newly traffic-free roads and the potential for these spaces to become subject to informal use by unregulated modes of transport and movement (mechanical and non-	B0070	<p>The Executive notes the issues raised.</p> <p>Misuse of standard or quietened roads with unregulated or illegal modes of transport would be an enforcement matter for An Garda Síochána.</p>

Issues	Sub No.	Executive's Responses and Recommendations
mechanical) that could compromise public safety barring appropriate deterrents and monitoring implementation.		<p>The prevention of such would therefore fall outside the remit of the local area planning process.</p> <p>Recommendation No change to the Draft Plan.</p>
xxix. The submission requests further detailed information on road layouts, traffic movements, and local access arrangements.	B0080	<p>The Executive notes the issues raised.</p> <p>It is considered that information relating to road layouts, traffic movements and local access arrangements is appropriately detailed in Figure 6.20 – 'Proposed Vehicular Transport Network for Old Connaught (Primary development area)' and in Section 6.6.4 – 'Vehicular Circulation' of the Draft Plan.</p> <p>The proposed road networks are at present indicative and will be subject to detailed design, public consultation and an appraisal/consent process prior to their implementation.</p> <p>Recommendation No change to the Draft Plan.</p>
3.6.12 Section 6.6.5.1 Speed Limits		
i. Requests the implementation of speed restrictions for vehicles.	B0079	<p>The Executive notes the issue raised.</p> <p>Objective TM24 – 'Speed Limits' of the Draft Plan states,</p> <p><i>'It is an Objective to support a low-speed environment, where appropriate, across the Draft Plan area. The road layout of new residential, commercial, and/or mixed-use developments shall be designed in accordance with DMURS which seeks to create self-enforcing 30km/h zones.'</i></p> <p>Recommendation No change to the Draft Plan.</p>
3.6.13 Section 6.6.5.5 Car Parking Management		

Issues	Sub No.	Executive's Responses and Recommendations
i. Submission requests that parking spaces be provided for the residents of the Cottages, Old Connaught Avenue.	B0019	<p>The Executive notes the issue raised.</p> <p>It is considered that the request in the submission would be more appropriately considered during the development management process for planning applications in this area of the Draft Plan.</p> <p>Recommendation No change to the Draft Plan.</p>
3.6.14 Section 6.7 Decarbonising Motor Transport		
i. EV charging points should be included in any car park design for the proposed Neighbourhood Centre, in order to help reduce fossil fuel dependence and increase air quality in the area.	B0019	<p>The Executive notes the issue raised.</p> <p>Objective TM35 – 'EV Charging Infrastructure' of the Draft Plan provides policy support for the request in this submission and it states,</p> <p><i>'It is an Objective to support the provision of publicly accessible charge points and infrastructure across the Draft Plan area in accordance with the development management standards set out in Section 12.4.11 of the dlr County Development Plan 2022- 2028.'</i></p> <p>Recommendation No change to the Draft Plan.</p>
ii. Concern in relation to how remote parking and vehicle restriction areas and questions could impact individuals investing in an EV or e-bike and their ability to charge their modes of transport.	B0078	<p>The Executive notes the issue raised.</p> <p>In regard to the submission, Objective TM35 – 'EV Charging Infrastructure' of the Draft Plan states,</p> <p><i>'It is an Objective to support the provision of publicly accessible charge points and infrastructure across the Draft Plan area in accordance with the development management standards set out in Section 12.4.11 of the dlr County Development Plan 2022- 2028.'</i></p> <p>In addition, Objective TM17 – 'Mobility Hubs' states,</p>

Issues	Sub No.	Executive's Responses and Recommendations
		<p><i>'It is an Objective to liaise with relevant stakeholders to establish the feasibility of providing Mobility Hubs at Old Connaught.'</i></p> <p>Given the above objectives, it is considered that Draft Plan provides clarification for the issue raised in this submission.</p> <p>Recommendation No change to the Draft Plan.</p>
3.6.15 Urban Design and Placemaking in Transport Schemes		
<p>i. Road signage and markings should be kept to a minimum in the LAP area.</p>	<p>B0029</p>	<p>The Executive notes the issue raised.</p> <p>It is an Objective that the Council in conjunction with the NTA ensure that a consistent wayfinding system will be introduced and maintained across Old Connaught's transport network and to develop Smart initiatives where applicable.</p> <p>The built environment itself can be made legible through physical means, but additional measures may be required to support independent navigation. Wayfinding information includes infrastructure such as area maps and directional signage. The Draft Plan is supportive of applicable Smart Dublin Initiatives.</p> <p>Recommendation No change to the Draft Plan.</p>

3.7 Chapter 7 – Green Infrastructure and Biodiversity

Issues	Sub No.	Executive's Responses and Recommendations
3.7.1 Section 7.2 Policy Context		
<p>i. The submission from EMRA observes that the local authority should be aware of their involvement in, and the findings of, the PROGRESS report and that this methodology approach should be incorporated into the implementation of green infrastructure and biodiversity policies in the Draft LAP.</p> <p>ii. Green infrastructure policy objectives could be further strengthened by the inclusion of guidance on how Green and Blue Infrastructure features can be integrated into the new proposals and by referring to the 'Guiding Principles in the preparation of Green Infrastructure Strategies' in Section 7.7 of the RSES.</p>	B0044	<p>The Executive notes and acknowledges the issues received.</p> <p>It is recommended that an amendment is made to Section 7.2 'Policy Context' of Chapter 7 'Green Infrastructure and Biodiversity' of the Draft Plan to include reference to the EMRA PROGRESS report and the guiding principles in the preparation of green infrastructure strategies.</p> <p>Recommendation Amend Section 7.2 'Policy Context' (page 77) as follows:</p> <p>"This Draft Plan has had regard to the provisions of the dlr Biodiversity Action Plan 2021-2025. The Biodiversity Action Plan is focused on nature recovery, restoration and reconnection and establishes a county-wide ecological network (see Section 7.5.4) and sets out overarching objectives and more specific actions, the implementation of which will ensure the protection and restoration of identified ecological corridors. Theme 2 of the Biodiversity Action Plan seeks to, "Mainstream biodiversity into decision-making and improve the management of this valuable resource", including through inputting into Local Area Plans which offer potential in terms of addressing biodiversity at the local level. <u>The Draft Plan shall have regard to the EMRA PROGRESS report methodology and the guiding principles in the preparation of green infrastructure strategies.</u>"</p>
<p>iii. Submission encourages the Local Authority to consider the Clean Air Strategy for Ireland while bearing in mind the impacts of measures adopted in the draft LAP on current and future air quality.</p>	B0075	<p>The Executive notes and acknowledges the issues received.</p> <p>It is considered that as set out in Section 10.4 – 'Pollution' in the higher order dlr County Development Plan 2022-2028, Policy Objective EI14: 'Air and Noise Pollution' provides policy guidance for clean air which is also applicable to the Draft Plan.</p>

Issues	Sub No.	Executive's Responses and Recommendations
		<p>In addition, more detailed standards are included in Section 12.9 'Environmental Infrastructure' in Chapter 12 'Development Management' of the County Development Plan. In this regard it is not considered necessary to duplicate the provisions of the County Development Plan in the Draft Plan.</p> <p>Recommendation No changes to the Draft Plan.</p>
3.7.2 Section 7.3 Green Infrastructure		
<p>i. The section on green infrastructure should take a ONE Health view, by examining the intersection between the environment, human health and animal health.</p>	B0078	<p>The Executive notes the issue raised.</p> <p>As set out in Section 7.3 of Chapter 7 of the Draft Plan, Policy OCLAP36 states the following,</p> <p><i>'It is Policy, where practicable and possible, to protect existing green infrastructure and encourage and facilitate, in consultation with relevant stakeholders, the creation, management, restoration and enhancement of our natural and semi natural areas.'</i></p> <p>It is considered that the Draft Plan already provides for the intersection between the environment, human health and animal health within Chapter 7, specifically Policy OCLAP36 and an amendment is therefore not recommended.</p> <p>Recommendation No changes to the Draft Plan.</p>
3.7.3 Section 7.4.2 Historic Landscape Character Assessment		
<p>i. Requests that the use of "Victorian" throughout the document be reviewed.</p>	B0058	<p>The Executive notes the issue raised and concurs with clarifying the wording.</p> <p>It is considered that the review of the word "Victorian" would be beneficial.</p> <p>Recommendation</p>

Issues	Sub No.	Executive's Responses and Recommendations
		<p>Amend Section 7.4.2 (page 78) as follows:</p> <p>"The first includes an extensive range of large Victorian <u>eighteenth century dated</u> villa-style houses set within extensive landscaped grounds – many of which are protected buildings."</p>
3.7.4 Section 7.4.3 Views and Prospects		
<ul style="list-style-type: none"> i. Highlights the need to preserve views to the sea. ii. Retain the protected vistas from Ballyman looking south over to Bray Head, both Sugarloaves, and Carrigoona. iii. Development will result in views over the fields and to the sea being lost. iv. Apartment complexes of four storey plus setback would block views of the Sugarloaf. 	<p>B0011 B0034 B0038 B0042 B0049</p>	<p>The Executive notes issue raised.</p> <p>The objective to preserve views in the Old Connaught area are included in the higher order dlr County Development Plan 2022-2028 and are replicated in the Draft Plan.</p> <p>During the period when planning applications for development within the Draft Plan are submitted, the objectives of the Draft Plan to preserve views will be considered.</p> <p>In this regard Objective GIB3 – 'Views and Prospects' of the Draft Plan states,</p> <p><i>'It is an Objective that views and prospects within landholdings are further assessed as part of the development management process for planning applications in the Draft Plan area. Where possible, the Planning Authority will seek to integrate the viewing potential of existing views and/or prospects.'</i></p> <p>Recommendation No change to Draft Plan.</p>
<ul style="list-style-type: none"> v. The views from Ballyman Road across the flat Enniskerry Delta fields to the Sugarloaf deserve protection. Proposes the construction of a viewing platform. 	<p>B0016</p>	<p>The Executive notes the issue raised.</p> <p>The infrastructure proposed for the Old Connaught area is indicated in the Draft Plan. It is considered more appropriate that during the detailed design and consent stage of planned infrastructure that such a request for a viewing platform would be more appropriately considered, if necessary.</p>

Issues	Sub No.	Executive's Responses and Recommendations
		Recommendation No change to Draft Plan.
3.7.5 Section 7.5 Biodiversity		
i. The submission recommends that the Local Authority takes opportunities to enhance biodiversity and amenities, including where flood risk management measures are planned, in line with RPOs 7.14 and 7.15 of the RSES.	B0044	<p>The Executive notes and acknowledges the issue raised.</p> <p>The Draft Plan features the following objectives in relation to biodiversity, Objective GIB4 – 'Ecological Corridors and Connectivity' and 'Objective GIB5 – Glendoo Mountain to Shanganagh Wildlife Corridor.'</p> <p>The Draft Plan also encourages development proposals to highlight biodiversity when creating scheme layout and design in Objective GIB15 – 'Biodiversity Led Design and Biodiversity Net Gain' which states,</p> <p><i>'It is an Objective that proposals for development demonstrate at pre-planning and application stage how biodiversity has informed scheme layout and design. Applicants are encouraged, where appropriate, to pilot the Biodiversity Net Gain Approach (BNG) for development.'</i></p> <p>Recommendation No change to the Draft Plan.</p>
ii. Query about what measures will be taken to protect existing wildlife.	B0045	<p>The Executive notes the issue raised.</p> <p>The Draft Plan features the following objectives in relation to the protection and enhancement of wildlife corridors, Objective GIB4 – 'Ecological Corridors and Connectivity' and 'Objective GIB5 – Glendoo Mountain to Shanganagh Wildlife Corridor.'</p> <p>In addition, Policy OCLAP40 – 'Ecological Assessment' states,</p> <p><i>'It is Policy to ensure adequate ecological surveys, and, where necessary, ecological impact assessments, are undertaken at project</i></p>

Issues	Sub No.	Executive's Responses and Recommendations
		<p><i>level to inform development decisions, in accordance with the requirements of the dlr County Development Plan 2022-2028.'</i></p> <p>This policy and objectives are considered appropriate to protect wildlife in the area.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>iii. Submission indicates that the club are committed to the promotion of biodiversity and environmental sustainability, serving as both a venue for sport and recreation as well as a sanctuary for a variety of plant and animal species.</p>	<p>B0055</p>	<p>The Executive notes and acknowledges the comments received.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>iv. Lack of enhancement regarding the Glenadoo Mountain to Shanganagh Park biodiversity corridor along the Allies River Road is disappointing.</p>	<p>B0072</p>	<p>The Executive notes the issues raised.</p> <p>The Draft Plan features the following objective in Chapter 7 in relation to the protection and enhancement of biodiversity and wildlife corridors,</p> <p>Objective GIB4 – 'Ecological Corridors and Connectivity'</p> <ul style="list-style-type: none"> <i>Protect, preserve, restore and enhance ecological connectivity within the Draft Plan area and beyond and to restore and mitigate fragmentation of ecological corridors.</i> <i>Encourage the design and function of green infrastructure to support the movement of species across the area.</i> <i>Facilitate the creation of new wildlife corridors within new development sites that connect to the wider landscape, as part of the development management process for planning applications in the Draft Plan area.</i> <p>It is therefore considered that the enhancement of the biodiversity corridors in the Draft Plan can be advanced.</p>

Issues	Sub No.	Executive's Responses and Recommendations
		Recommendation No change to the Draft Plan.
v. Submission enquires what measures are being implemented to protect or offset the loss of biodiversity. vi. Request to ensure net biodiversity gain in the Old Connaught LAP by enhancing the Glenadoo Mountain to Shanganagh Park corridor along the Allies River Road.	<u>B0037</u> <u>B0072</u>	The Executive notes the issues raised. As set out in the Draft Plan, Objectives GIB15 – 'Biodiversity Led Design and Biodiversity Net Gain' and GIB16 – 'Re-wilding and Habitat Restoration/Creation' both address the measures that will be implemented in the Draft Plan to protect and offset the loss of biodiversity and to provide for biodiversity net gain design. Recommendation No change to the Draft Plan.
vii. Submission from the Department of Housing, Local Government and Heritage welcome the provisions made in the Draft plan to conserve biodiversity.	<u>B0077</u>	The Executive notes and acknowledges the comments received. Recommendation No change to the Draft Plan.
3.7.6 Section 7.5.2 Designated Areas		
i. Submission from the Department of Housing, Local Government and Heritage consider the inclusion of OCLAP 38 & 39 should help ensure the preservation of the biodiversity value of the Ballyman Glen SAC. ii. Requests that for development proposals situated in the catchment area for GWDTE situated in Ballyman Glen SAC appropriate cognisance shall be given to potential connections and interactions between surface water and groundwater.	<u>B0077</u>	The Executive welcomes the comments received and notes the issue raised. The two policies referred to in the submission are, Policy OCLAP38 – 'Ballyman Glen SAC / pNHA' and Policy OCLAP39 – 'Groundwater Dependent Terrestrial Ecosystems'. It is considered that these policies provide for appropriate cognisance to be given to potential connections and interactions between surface water and groundwater. Recommendation No change to the Draft Plan.
iii. The retention of all GB zoned land in the LAP which shares groundwater catchment with	<u>B0077</u>	The Executive notes and acknowledges the issue raised.

Issues	Sub No.	Executive's Responses and Recommendations
<p>Ballyman Glen SAC is welcomed. It is encouraged that these land uses remain consistent in the future to preserve the present ground water regime maintaining the QI habitats there.</p>		<p>Recommendation No change to the Draft Plan.</p>
<p>iv. The proposed LUAS line extension, indicative bus route and road extensions across, or very close to, the downstream end of the Ballyman Glen should only proceed if any adverse effects on the QI habitats for the Ballyman SAC and the rare plant communities they support can be ruled out.</p> <p>Any works in the Fassaroe area risk the disturbance of abandoned dumps, potentially leading to detrimental impacts on the SAC.</p>	B0077	<p>The Executive notes the issue raised and consider that the policy framework included in the Draft Plan and Chapter 7 provide the safeguards referenced in the submission.</p> <p>Recommendation No change to the Draft Plan.</p>
3.7.7 Section 7.5.4 Ecological Network and Wildlife Corridor		
<p>i. Submission indicates that there appears to be an apparent conflict between the inclusion of a commercial forestry plantation in the Glendoo Mountain to Shanganagh Wildlife Corridor. Although the biodiversity makeup of these woodlands is likely of limited value, there is potential future importance of the land as a wildlife connection between the lands west of the LAP and the Shanganagh Regional Park.</p> <p>Recommends the retention of some of the recently established plantation as plantation, and reducing proportionately the land proposed to be included in the 'Allies River Road Park' and 'Ferndale Road Park'.</p>	B0077	<p>The Executive notes the issue raised.</p> <p>The Glendoo Mountain to Shanganagh Wildlife Corridor is included in the Draft Plan as referenced in the dlr Biodiversity Action Plan 2021-2025.</p> <p>In Section 7.5.4 – 'Ecological Network and Wildlife Corridor' of the Draft Plan, it's stated that,</p> <p><i>'the wildlife corridors set out in the Biodiversity Action Plan do not preclude development of the lands subject to assessment under the planning process and subject to any other legal obligations. However, development is required where it can, to aim to improve connectivity, restore and enhance wildlife corridors in the context of the planning process'.</i></p> <p>Also, Objective GIB5 – 'Glendoo Mountain to Shanganagh Wildlife Corridor' of the Draft Plan states,</p>

Issues	Sub No.	Executive's Responses and Recommendations
		<p><i>'It is an Objective to consider the Glendoo Mountain to Shanganagh Wildlife Corridor, identified in the dlr Biodiversity Action Plan 2021–2025, as part of the development management process for planning applications in the Draft Plan area.'</i></p> <p>Therefore, it is considered that the recommendation in the submission will be considered during the development management process for planning applications in this area of the Draft Plan.</p> <p>Recommendation No change to the Draft Plan.</p>
3.7.8 Section 7.5.5 Fauna		
<p>i. The wooded area directly to the north of Allies River Road is an important habitat for a family of buzzards. Any proposed development takes this information into consideration.</p>	B0015	<p>The Executive notes the issue raised.</p> <p>It is considered that Chapter 7 of the Draft Plan in particular Policy OCLAP40 - 'Ecological Assessment' will be taken into consideration in the event of any future development of this area.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>ii. Enquires about plans to undertake environmental or ecological impact assessment and replace green space taken if development encroaches on green areas or mature trees.</p>	B0037	<p>The Executive notes the issue raised.</p> <p>It is considered that the Draft Plan in Chapter 7 provides policy direction for ecological impact assessment as contained in Policy OCLAP40 – 'Ecological Assessment' which states,</p> <p><i>'It is Policy to ensure adequate ecological surveys, and, where necessary, ecological impact assessments, are undertaken at project level to inform development decisions, in accordance with the requirements of the dlr County Development Plan 2022-2028.'</i></p> <p>Recommendation No change to the Draft Plan</p>

Issues	Sub No.	Executive's Responses and Recommendations
3.7.9 Section 7.5.6 Trees and Hedgerows		
<p>i. Submission requests to maintain sections of old walls, hedgerows and mature deciduous trees.</p>	B0038	<p>The Executive notes the issue raised.</p> <p>A variety of woodlands and individual trees throughout the Draft Plan area are designated for preservation and protection under the dlr County Development Plan 2022-2028. The location of these trees and woodlands in the Old Connaught area and are indicated in Figure 7.5 of Chapter 7 of the Draft Plan.</p> <p>Section 7.5.6.2 - 'Hedgerows' of the Draft Plan indicates that hedgerows are important habitats across the Old Connaught Draft Plan area. There are extensive hedgerows along the boundaries of open spaces/fields which have ecological value and provide ecological corridors.</p> <p>The Draft Plan incorporates Objective GIB7 – 'Trees and Hedgerows' which states,</p> <p><i>'It is an Objective to protect and maintain important trees and hedgerows within the Draft Plan area, where practicable, and to promote native tree/hedgerow enhancement and planting. The retention and protection of existing trees / woodlands / hedgerows shall accord with the requirements of the dlr County Development Plan 2022-2028.'</i></p> <p>Recommendation No change to the Draft Plan.</p>
<p>ii. The Department of Housing, Local Government and Heritage note the biodiversity importance of the existing tree rows and hedgerows in the LAP area as they form nesting habitats for bird species and bats, and route ways. The DHLGH welcome Objective GIB7 - Trees and Hedgerows.</p>	B0077	<p>The Executive notes and acknowledges the comments received. It is considered that the Draft Plan including Chapter 7 provides a strong policy framework to protect the trees and hedgerows network in the Old Connaught area.</p> <p>Recommendation No change to the Draft Plan.</p>

Issues	Sub No.	Executive's Responses and Recommendations
Preserving as much as possible of the existing historical tree line and hedgerow network is the most viable approach to conserving a significant level of biodiversity in the LAP area.		
3.7.10 Section 7.5.6.1 Trees		
<ul style="list-style-type: none"> i. Submission requests a more detailed outline of which trees are to be protected during development and which are not. The current level of tree density in the area is a key contributor to Old Connaught's character. ii. Submission requests clarification regarding tree protection along main roads once development begins and requests confirmation about tree protection and new tree planting along new roads. iii. Submissions highlight the need to protect trees. iv. Submission enquires regarding the existence of a tree protection plan or replanting strategy. v. Submission queries about what measures will be taken to protect existing trees. 	<p>B0003 B0009 B0011 B0034 B0037 B0045</p>	<p>The Executive notes the issue raised.</p> <p>Section 7.5.6.1 – 'Trees' of the Draft Plan indicates that a variety of woodlands and individual trees throughout the Draft Plan area are designated for preservation and protection under the dlr County Development Plan 2022-2028. These are indicated by symbols on the County Development Plan Land Use Zoning Maps with the objective – "to protect and preserve trees and woodlands". The location of these trees and woodlands in the Old Connaught area and are indicated in Figure 7.5 of the Draft Plan.</p> <p>The Draft Plan also provides for Objective GIB7 – 'Trees and Hedgerows' which states,</p> <p><i>'It is an Objective to protect and maintain important trees and hedgerows within the Draft Plan area, where practicable, and to promote native tree/hedgerow enhancement and planting. The retention and protection of existing trees / woodlands / hedgerows shall accord with the requirements of the dlr County Development Plan 2022-2028.'</i></p> <p>Therefore, it is considered that a policy framework exists in the Draft Plan for the protection of trees. A more detailed outline of trees to be maintained and protected and new tree planting will emerge during the detailed design and consent stage of development proposals by way of the development management process.</p> <p>Recommendation No change to the Draft Plan.</p>

Issues	Sub No.	Executive's Responses and Recommendations
vi. Submission highlights the importance of tree protection primarily on Ballyman Road within two of the proposed character areas – the Village Core and the Western Character area.	<u>B0005</u>	The Executive notes and acknowledges the comments received. Recommendation No change to the Draft Plan.
vii. Trees can deliver a cooling and shade effect in heatwave conditions to protect vulnerable sections of the community as well as sequester carbon.	<u>B0078</u>	The Executive notes and acknowledges the comments received. Recommendation No change to the Draft Plan.

3.8 Chapter 8 – Open Space, Parks and Recreation

Issues	Sub. No.	Executive's Response & Recommendation
3.8.1 Section 8.3 Existing Provision		
<p>i. Highlights/Outlines the role of Bray Emmets GAA Club in the community. Acknowledges a full-capacity operation at the club and states plans to expand facilities to meet future demand.</p> <p>Objects to the absence of emphasis of the club's infrastructure and proposals within the Draft LAP.</p> <p>Highlights long-term implementation plans to address the increasing demand including:</p> <ul style="list-style-type: none"> • Upgrading the current walking track to allow inclusion of a full running track. • Upgraded LED floodlighting. • Construction of a multi-sports hall with a gym and training space. • Improved stand facilities to host larger sporting, cultural, and community events. • Expansion of clubhouse facilities to sustain club growth and community partnerships and to offer commercial potential. 	<u>B0035</u>	<p>The Executive notes the issues raised and acknowledges the role the club has in the community and the Old Connaught area.</p> <p>Following a review of the submission, the Executive appreciate having an understanding the club's plans to address increasing demand.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>ii. Bray Emmets GAA raise concerns regarding the proximity of new roads, the Luas line and apartments adjacent to the club and the potential for noise, privacy and overshadowing impacts on the club's grounds.</p>	<u>B0035</u>	<p>The Executive notes the issue raised.</p> <p>It is noted that the locations of the proposed infrastructure as referred to in the submission are indicative. In this regard Policy OCLAP33 – 'Environmental Assessment of Transport Infrastructure' and Section - 6.6.1 'Transport Strategy – Overview' indicate that when infrastructure plans and proposals in the Draft Plan are being advanced, they will be subject to a detailed a Corridor and Route Selection Process and planning consent process.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>In relation to noise impacts, the Draft Plan was prepared with regard to the higher order dlr County Development Plan 2022-2028. It contains Chapter 5 'Transport and Mobility' which indicates Policy Objective T27: 'Traffic Noise' that states,</p> <p><i>'It is a Policy Objective to ensure that traffic noise levels are considered as part of new developments along major roads/rail lines in accordance with best practice guidelines. Along major transport corridors, the effect of traffic noise on the development must be considered and appropriate measures undertaken to mitigate the effect of noise. This should be considered in the context of the 'Dublin Agglomeration Environmental Noise Action Plan 2018-2023'. The Noise Action Plan is aimed at managing environmental noise and excludes, for the most part, noise from domestic activities, noise created by neighbours, noise at work places or construction noise. In the planning and design of national road schemes, cognisance must be given to the National Road Authority document 'Guidelines for the Treatment of Noise and Vibration in National Road Schemes' (2004) and to the subsequent supplementary document 'Good Practice Guidance for the Treatment of Noise during the Planning of National Road Schemes' (2014).'</i></p> <p>Recommendation No change to the Draft Plan.</p>
<p>iii. Facilities at St. Gerard's School (identified as a green space), remain largely inaccessible to the public in contrast to Bray Emmets GAA Club.</p>	<p><u>B0035</u></p>	<p>The Executive notes the issue raised and acknowledges the comments received.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>3.8.2 Section 8.4 Public Open Space Strategy – Strategic Parks and Spaces</p>		
<p>i. Within the plan there appears to be a lack of green spaces and planting, which is considered disappointing.</p>	<p><u>B0009</u> <u>B0011</u> <u>B0034</u> <u>B0035</u></p>	<p>The Executive acknowledges the comments received, notes the issue raised and does not agree.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> ii. Concern about the limited amount of green open space in comparison to proposed density. iii. Welcomes new housing as a response to demand but believe commensurate growth in recreational infrastructure should align with new housing. iv. Criticises the location of the proposed public open spaces and claims they do not fit the description in the draft plan of a "connected network of strategic public open spaces". v. Query whether any green areas lost to development are to be replaced or enhanced. 	<p>B0045 B0049</p>	<p>Chapter 8 'Open Space, Parks and Recreation' including Section 8.4 'Public Open Space Strategy – Strategic Parks and Spaces' of the Draft Plan sets out the plan-led approach to the provision of a comprehensive network of strategic parks and open spaces to support the sustainable development of Old Connaught.</p> <p>Recommendation No change to the Draft Plan.</p>
<ul style="list-style-type: none"> vi. The quantum of open space provision being proposed in the plan area is unsubstantiated and unwarranted by reference to the draft LAP, the associated ICAS and the dlr County Development Plan 2022-2028. This excessive provision would displace housing within Old Connaught and require significant capital funding to deliver. vii. The excessive proposed provision of open space in the LAP area contributes to 78% of the zoned land not being able to be brought forward for development. This will impact an associated number of housing units in a manner that is contrary to the zoning provisions of the County Development Plan. 	<p>B0060 B0064</p>	<p>The Executive notes the issue raised and does not agree.</p> <p>The ICAS Part 3 report is the 'Options Development and Assessment Report.' In the Part 3 report, three parks and open spaces network options were initially developed for the Old Connaught area. These parks and open space network options were assessed by way of a multi criteria analysis. Following the multi criteria analysis of the three park and open space network options, option 1 was emerging preferred scenario.</p> <p>Option 1 was then carried forward from the ICAS and further considered and developed during the preparation of the Draft Plan. This resulted in plan-led approach to the provision of a network of strategic parks and open spaces to support the sustainable development of Old Connaught as indicated in Section 8.4 'Public Open Space Strategy – Strategic Parks and Spaces'.</p> <p>It is therefore not considered that the open space strategy of the Draft Plan is unsubstantiated or unwarranted. It is considered to be an appropriate response to ensure the provision of open space to serve the existing and new communities that will emerge in Old Connaught.</p> <p>Recommendation No change to the Draft Plan.</p>

Issues	Sub. No.	Executive's Response & Recommendation
viii. There is a lack of clarity on the proposed use, funding, and logistics of the proposed active park.	B0060	<p>The Executive notes the issue raised.</p> <p>The proposed Allies River Road Active Park is indicated in the Draft Plan in Figure 8.2: Old Connaught Public Open Space Strategy – Strategic Plan Level.</p> <p>It is then described in detail in Section 8.4.1.1 – 'Allies River Road Active Park' as follows,</p> <p><i>'The objective of Allies River Road Active Park is to provide an active park/community campus focussed on the provision of sport, recreational and community facilities to provide for both the existing and new residential community at Old Connaught.....The provision of a high quality sporting and recreational campus at Allies River Road to support the growth of Old Connaught is consistent with Policy Objective OSR9 of the dlr County Development Plan 2022- 2028.</i></p> <p><i>In terms of function and use, Allies River Road Park may provide both indoor and outdoor recreational and sporting facilities which seek to promote accessibility and inclusion for as many local people as possible through the provision of a diverse range of sports. Community facilities will be integrated as a core and complementary use at Allies River Road Active Park, maximising co-location benefits and increasing social inclusiveness and sense of place. The requirement for community facilities and a 'changing places bathroom' at this location is detailed in Section 5.2.1.2 and 5.2.1.5 of the Draft Plan. The co-location of the park adjacent to the planned school will also provide for the sharing of outdoor recreational facilities.</i></p> <p><i>The location of Allies River Road Park has had regard to the need to ensure facilities are located where they are of most value and accessible to the Old Connaught community in the long term. The Park is integrated with planned active travel routes as part of the movement strategy for the Draft Plan to promote and encourage walking and</i></p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p><i>cycling trips. Having regard to the scale and function of Allies Rover Road Park, it is an Objective that an overall campus masterplan is progressed to provide a coherent framework to guide the development of the Park.'</i></p> <p>It is considered appropriate that during the detailed design and consent stage of planned infrastructure that funding and detailed logistics for the proposed active park will be appropriately considered.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>ix. Concerns over regarding safety, security and residential amenity particularly in relation to proposed permeability routes, greenways, active travel corridors, and public open spaces especially when interfacing with existing residential areas.</p>	<p><u>B0070</u></p>	<p>The Executive notes the issue raised.</p> <p>It is not anticipated that the proposed permeability routes, greenways, active travel corridors, and public open spaces would give rise to any significant privacy, security, safety, or residential amenity issues.</p> <p>In addition, a detailed design process will be undertaken which will examine engineering feasibility, access, and safety including public lighting among other matters when interfacing the open spaces, parks and recreational spaces with existing residential areas.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>x. Submission notes the benefit for biodiversity and Shankill locals of expanding Shanganagh Park westwards across the M11 and into the LAP area along Allies River Road. This measure would also preserve the woodlands in this area.</p>	<p><u>B0072</u></p>	<p>The Executive notes the issue raised.</p> <p>Chapter 8 'Open Space, Parks and Recreation' including Section 8.4 'Public Open Space Strategy – Strategic Parks and Spaces' of the Draft Plan sets out the plan-led approach to the provision of a comprehensive network of strategic parks and open spaces for the existing and new community and to support the sustainable development of Old Connaught.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>It is not proposed to expand Shanganagh Park westwards and across the M11 into the LAP area. A proposed active travel bridge is included in the Draft Plan to reconnect both sides of Allies River Road.</p> <p>Recommendation No change to the Draft Plan.</p>
xi. Open space, parks and recreation in the area form an important role in supporting climate change mitigation and adaptation.	B0078	<p>The Executive notes and acknowledges the comments received.</p> <p>Recommendation No change to the Draft Plan.</p>
3.8.3 Section 8.4.1.1 Allies River Road Active Park		
i. Authorise Bray Emmets (and its community of users) to maintain and control the area designated as Active Park and Schools area to maximise use of the facilities for multi-sports use.	B0035	<p>The Executive notes the issue raised.</p> <p>This is considered to be an operational issue when the active park becomes available.</p> <p>Recommendation No change to the Draft Plan.</p>
ii. Consider investment in additional playing pitches and facilities in the plan to support the expected growth in community sports participation.	B0062	<p>The Executive notes and acknowledges the comments received.</p> <p>Recommendation No change to the Draft Plan.</p>
3.8.4 Section 8.4.1.3 Walled Gardens Park		
i. Requests that the use of "Victorian" throughout the document be reviewed.	B0058	<p>The Executive notes the issue raised and concurs with clarifying the wording.</p> <p>It is considered that the review of the word "Victorian" would be beneficial.</p> <p>Recommendation Amend Section 8.4.1.3 (page 90) as follows:</p>

Issues	Sub. No.	Executive's Response & Recommendation
		"The existence of the Victorian <u>eighteenth century dated</u> Walled Gardens in the heart of Old Connaught is a significant asset and focal point for community activity and engagement with local heritage and landscape."
3.8.5 Section 8.4.1.4 Old Connaught Village Green		
i. The location of the village green would have no connection to the village centre and little passive overlooking.	<u>B0049</u>	<p>The Executive notes the issue raised.</p> <p>It is considered that the proposed village green will be within close walking distance of the village centre and the proposed neighbourhood centre. In addition, the development proposed in the southern character area to the south of the village green will provide enclosure and passive surveillance of the village green.</p> <p>Recommendation No change to the Draft Plan.</p>
ii. Submission notes that the naming of a new proposed park as "village green" is confusing as a village green already exists.	<u>B0057</u>	<p>The Executive notes and acknowledges the comments received and is not recommending an amendment to the naming.</p> <p>Recommendation No change to the Draft Plan.</p>
iii. Submission recommends the removal of proposed Old Connaught Village Green. The location of the proposed open space has 5 no. existing habitable detached houses which would need to be demolished to facilitate such a proposal.	<u>B0064</u>	<p>The Executive notes the issue raised and does not agree.</p> <p>Section 8.4 'Public Open Space Strategy – Strategic Parks and Spaces' of the Draft Plan sets out the plan-led approach to the provision of a comprehensive network of strategic parks and open spaces for the existing and new community in Old Connaught.</p> <p>In particular, Section 8.4.1.4 'Old Connaught Village Green' highlights the rationale behind the proposal including resonating with the existing character of Old Connaught as well as complementing and respecting the heritage of the adjacent graveyard and church ruins.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>Therefore, it is considered that the removal of the proposed village green is not appropriate and is not being recommended.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>iv. Current location of village green could become vulnerable to unregulated/unauthorised informal land uses.</p>	<p>B0070</p>	<p>The Executive notes the issue raised.</p> <p>Section 4.4.6.2 'The Village Core – Site Development Framework' indicates that the development proposed in the southern character area to the south of the village green will provide enclosure and passive surveillance of the proposed village green to reduce to unregulated/unauthorised land uses.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>3.8.6 Section 8.4.1.5 Thornhill Road Park</p>		
<p>i. Submission requests the relocation of Thornhill Road Park to the eastern side of Thornhill Road for biodiversity and topographical rationale.</p>	<p>B0064</p>	<p>The Executive notes the issue raised.</p> <p>The Executive do not agree with the proposed alternative location. As set out in Section 4.4.7.1 - 'Site Potential and Design Challenges', topography is an important characteristic in the Western Character Area. The proposed Thornhill Road Park that is included in the Draft Plan in the Western Character Area takes a sensitive approach to development given the topographical and view constraints.</p> <p>In addition, 8.4.1.5 – 'Thornhill Road Park' of the Draft Plan states in part,</p> <p><i>'Thornhill Road Park will comprise a destination park incorporating the main natural play space for Old Connaught. As stated in the dlr County Development Plan 2022-2028, the Council is moving towards a more nature based play philosophy and approach with respect to the provision of play opportunities.....'</i></p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>Therefore, the relocation of Thornhill Road Park is not recommended.</p> <p>Recommendation No change to the Draft Plan.</p>
Issues	Sub. No.	Executive's Response & Recommendation
3.8.7 Section 8.5 Public Open Space as part of Residential Schemes		
i. Suggests the locations of the 10% provision of the net residential area as public open space should be at the discretion of the developer and remain flexible.	B0060	<p>The Executive notes the issue raised</p> <p>The Section 28 Guidelines '<i>Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities</i>' (2024) states in part in Policy and Objective 5.1 – 'Public Open Space' that,</p> <p><i>'It is a policy and objective of these Guidelines that statutory development plans include an objective(s) relating to the provision of public open space in new residential development (and in mixed-use developments that include a residential element). The requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area save in exceptional circumstances.'</i></p> <p>In addition, Policy OCLAP45 – 'Public Open Space for Residential Schemes' of the Draft Plan states,</p> <p><i>'It is Policy that a minimum of 10% of total net residential site area shall comprise public open space in new residential developments. Public open space provision for residential schemes will be based on net residential area as defined in Appendix B of the Section Guidelines 'Sustainable and Compact Settlements' (2024).'</i></p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>Discretion is provided for in Section 4.4.2 – 'Site Development Frameworks' which indicates the site development frameworks have some flexibility to allow for a range of potential design solutions.</p> <p>Recommendation No changes to Draft Plan.</p>

Chapter 9 – Heritage and Conservation

Issues	Sub. No.	Executive's Response & Recommendation
3.9.1 Section 9.2 Historical Context		
i. Notes that the landscape is not landlord-dominated and that all houses in the area were leasehold tenants.	<u>B0058</u>	<p>The Executive notes the issue raised and sees the benefit in clarifying the historic landscape of the Draft Plan.</p> <p>Recommendation Amend Section 9.2 (page 95) as follows:</p> <p>"The Historic Ordnance Survey map illustrates the area as a landlord-dominated <u>leasehold tenant</u> landscape with the presence of many large houses, for example, Old Connaught House, Jubilee Hall, Knocklinn House and Thornhill House (currently St. Gerard's school)."</p>
ii. Notes that the publication date of the six-inch map is mislabelled.	<u>B0058</u>	<p>The Executive notes the issue raised and sees the benefit in clarifying the publication date of the map.</p> <p>Recommendation Amend Section 9.2 (page 95) as follows:</p> <p>"The First edition 6 Inch mapping surveyed by Ordnance Survey between 1829 and 1834 <u>in 1843</u> displays a settlement and formal layout very similar to the present-day settlement pattern."</p>
iii. Notes that the Festina Lente complex is not historic, only the walled gardens.	<u>B0058</u>	<p>The Executive notes the issue raised and sees the benefit in clarifying the wording.</p> <p>Recommendation Amend Section 9.2 (page 95) as follows:</p> <p>"The impact of parklands and demesne land on the landscape remains evident today, particularly the walled gardens of Old Connaught House (and the Festina Lente complex) and the trees and bands of trees in the area."</p>
3.9.2 Section 9.4 Built Heritage		

Issues	Sub. No.	Executive's Response & Recommendation
<p>i. Significant buildings like Old Connaught House, the walled gardens at Festina Lente and the old Burial Ground on Old Connaught Avenue should be preserved at all costs and taken into the care of the OPW (except for Old Connaught House).</p> <p>ii. Notes the historic character of the area with reference to sites like Old Connaught House, Festina Lente and the area's cemetery (which contains national monuments) and emphasises the need for their settings to be protected and enhanced.</p>	<p><u>B0009</u> <u>B0011</u> <u>B0034</u></p>	<p>The Executive notes and acknowledges the issues raised and consider that the Draft Plan provides the framework for the protection of these buildings and features as indicated in Policy OCLAP46 – 'Built Heritage' which states,</p> <p><i>'It is Policy to conserve, protect and enhance (as appropriate) the built heritage of Old Connaught including Protected Structures and attendant grounds, in accordance with best conservation practice and policy objectives set out in Chapter 11 and Section 12.11 of the dlr County Development Plan 2022-2028.'</i></p> <p>Recommendation No change to the Draft Plan</p>
<p>iii. Concerns regarding whether the gardens at Festina Lente will continue to be cared for and concerns about the potential for neglect.</p> <p>iv. Requests the retention and protection of the Walled Gardens.</p>	<p><u>B0013</u> <u>B0079</u></p>	<p>The Executive notes the issue raised.</p> <p>As set out in Section 9.4.1.1 – 'Victorian Walled Gardens' of Chapter 9 in the Draft Plan,</p> <p><i>'the existence of the Victorian Walled Gardens in the core of the village is a significant asset and focal point for community activity and engagement with local heritage and landscape. Its retention as a focal point for the community and continued use is considered appropriate. It is an objective to support the continued use and/or potential adaptive re-use of the Walled Gardens in line with its underlying land use Objective 'F' zoning status.'</i></p> <p>In addition, Objective HC1 – 'Victorian Walled Gardens' states,</p> <p><i>'It is an Objective to:</i></p> <ul style="list-style-type: none"> <i>• Support the continued use and/or potential adaptive re-use of the Victorian Walled Gardens in line with its underlying Objective 'F' zoning status.</i>

Issues	Sub. No.	Executive's Response & Recommendation
		<ul style="list-style-type: none"> • Enhance and extend the public realm setting of the Walled Gardens through the integration of strategic public open space immediately to the north (see section 8.4.1.3 – Walled Gardens Park). • Ensure that any development in proximity of the Walled Gardens, including improvements to the public realm, protects, conserves and enhances its setting.' <p>Recommendation No change to the Draft Plan.</p>
<p>v. Submission indicates concerns regarding the proposed road and LUAS plans in the vicinity of Cuilín, a Protected Structure, resulting in the property being surrounded on all four sides by significant roadways. The proposed routes would materially impact upon the character of the property and its surrounding area.</p> <p>vi. The proposed road plan is the antithesis of what the LAP sets out are the considerations when developing around the Protected Structures. Suggests an inconsistent approach to Cuilín as a Protected Structure compared to other existing Protected Structures in the LAP area.</p> <p>vii. Considers that the Local Authority team at the public consultation did not fully understand or appreciate the layout of Cuilín or walled garden.</p> <p>viii. Acknowledges the importance of sustainability and climate action and their integration into the draft LAP but expresses frustration they are not allowed</p>	<p>B0015</p>	<p>The Executive notes the issues raised.</p> <p>The property and grounds are located in the area of a conflux of proposed transport and other infrastructure in the Draft Plan area and the concerns in this regard are acknowledged.</p> <p>It is noted that the location of this proposed infrastructure is indicative, which is indicated in Policy OCLAP33 – 'Environmental Assessment of Transport Infrastructure' which states,</p> <p><i>'It is Policy that, where appropriate, proposed transport infrastructure projects, that are not already permitted or provided for by existing plans/programmes/etc. which have been subject to environmental assessment, will be subject to the undertaking of a Corridor and Route Selection Process in two stages: Stage 1 – Route Selection Identification, Evaluation and Selection; and Stage 2 - Route Selection, Evaluation and Selection. The detail associated with such projects referred to in this Draft Plan is non-binding and indicative.'</i></p> <p>When infrastructure plans and proposals in the Draft Plan are being advanced, they will be subject to a detailed a Corridor and Route Selection Process and planning consent process.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>implement sustainable interventions on the property due to its Protected Structure status.</p>		<p>In the Draft Plan, Policy OCLAP47 – 'Alterations to Protected Structures' provides,</p> <p><i>'It is Policy to support proposals that enhance, extend or change the use of Protected Structures which result in a viable modern use, subject to appropriate design, materials and construction methods. All such proposals shall accord with Policy Objective HER8 and Section 12.11 of the County Development Plan 2022-2028.'</i></p> <p>It is considered that alterations to protected structures may be permitted subject to appropriate design, materials and construction methods.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>ix. Acknowledges the importance of sustainability and climate action and their integration into the draft LAP but expresses frustration they are not allowed implement sustainable interventions on the property due to its Protected Structure status.</p>	<p><u>B0030</u></p>	<p>The Executive notes the issue raised.</p> <p>In the Draft Plan, Policy OCLAP47 – 'Alterations to Protected Structures' provides,</p> <p><i>'It is Policy to support proposals that enhance, extend or change the use of Protected Structures which result in a viable modern use, subject to appropriate design, materials and construction methods. All such proposals shall accord with Policy Objective HER8 and Section 12.11 of the County Development Plan 2022-2028.'</i></p> <p>It is considered that alterations to protected structures may be permitted subject to appropriate design, materials and construction methods.</p> <p>Recommendation No change to the Draft Plan.</p>

Issues	Sub. No.	Executive's Response & Recommendation
x. Submission notes historic stable block opposite the walled garden is ideally suited for adaptive reuse and requests the prioritisation of its protection and reactivation.	<u>B0057</u>	<p>The Executive notes the issue raised.</p> <p>It is considered that the intention of the submission is already provided for in the Draft Plan.</p> <p>Figure 4.8: 'Old Connaught Village Core Site Development Framework' of the Draft Plan identifies this area as a 'Regeneration Opportunity'.</p> <p>Recommendation No change to the Draft Plan.</p>
3.9.3 Section 9.4.1 Protected Structures		
i. Requests the removal of the walled garden of Old Connaught House from under "Palermo" list.	<u>B0058</u>	<p>The Executive notes the issue raised and consider that the listing in Table 9.1 of the Draft Plan is consistent with that indicated in Appendix 4 'Heritage Lists' of the dlr County Development Plan 2022-2028 and therefore should not be amended.</p> <p>Recommendation No change to Draft Plan.</p>
ii. Requests a change in the text to read, "Knocklinn, on Ballyman Road, has been vacant for many years".	<u>B0058</u>	<p>The Executive notes the issue raised and sees the benefit in clarifying the wording.</p> <p>Recommendation Amend Section 9.4.1 (page 96) as follows:</p> <p>"Jubilee Hall, a former Spanish School, has been vacant for a number of years while Knocklinn House, off the Ballyman Road <u>on Ballyman Road, also appears to be vacant</u> <u>has also been vacant for many years.</u>"</p>
iii. Requests that the use of "Victorian" throughout the document be reviewed.	<u>B0058</u>	<p>The Executive notes the issue raised and concurs with clarifying the wording.</p> <p>It is considered that the review of the word "Victorian" would be beneficial.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>Recommendation Amend Section 9.4.1 (page 96) as follows:</p> <p>"Thornhill House is now in operation as St. Gerard's Senior School, and the eighteenth century Victorian Walled Garden is in temporary occupation by Festina Lente as a publicly accessible equestrian and horticultural learning centre."</p>
3.9.4 Section 9.4.1.1 Victorian Walled Gardens		
<p>i. Requests that the use of "Victorian" throughout the document be reviewed.</p>	<p><u>B0058</u></p>	<p>The Executive notes the issue raised and concurs with clarifying the wording.</p> <p>It is considered that the review of the word "Victorian" would be beneficial.</p> <p>Recommendation Amend section 9.4.1.1 (page 97) as follows: "Victorian <u>Eighteenth century dated</u> Walled Gardens"</p> <p>"The Victorian <u>eighteenth century dated</u> Walled Gardens to the north of Old Connaught Avenue date back to the 1780's when it was built as part of the Old Connaught House Estate, an eighteenth-century home to the Conyngham-Plunkets.</p> <p>"The Victorian <u>eighteenth century dated</u> Walled Gardens in the core of the Village comprises a focal point for community activity and engagement with local heritage and landscape."</p> <p>"The existence of the Victorian <u>eighteenth century dated</u> Walled Gardens in the core of the village is a significant asset and focal point for community activity and engagement with local heritage and landscape."</p>

Issues	Sub. No.	Executive's Response & Recommendation
3.9.5 Section 9.4.1.2 Jubilee Hall		
i. Requests that the use of "Victorian" throughout the document be reviewed.	<u>B0058</u>	<p>The Executive notes the issue raised and concurs with clarifying the wording.</p> <p>It is considered that the review of the word "Victorian" would be beneficial.</p> <p>Recommendation Amend Section 9.4.1.2 (page 98) as follows:</p> <p>"Jubilee Hall was built in the mid to late nineteenth century and comprises a large two storey Victorian <u>eighteenth century dated</u> mock-castle type house with extensive out buildings."</p> <p>Amend Objective HC1 (page 98) as follows:</p> <p>"Objective HC1 – Victorian <u>Eighteenth century dated</u> Walled Gardens."</p> <p>Amend Objective HC1 – Victorian Walled Gardens (page 98) as follows:</p> <p>"Support the continued use and/or potential adaptive re-use of the Victorian <u>eighteenth century dated</u> Walled Gardens in line with its underlying Objective 'F' zoning status."</p>
ii. Notes that Jubilee Hall is an eighteenth-century house, remodelled with castellations in about 1812.	<u>B0058</u>	<p>The Executive notes the issue raised and concurs with clarifying the wording.</p> <p>Recommendation Amend Section 9.4.1.2 (page 98) as follows:</p> <p>"Jubilee Hall was built in the mid to late nineteenth century <u>is an eighteenth-century house, remodelled with castellations in about 1812</u> and comprises a large two storey Victorian mock-castle type house with extensive out buildings."</p>

Issues	Sub. No.	Executive's Response & Recommendation
iii. Proposal for a community use as part of the regeneration of Jubilee Hall	<u>B0064</u>	<p>The Executive notes the issue raised.</p> <p>Jubilee Hall has a land use zoning 'Objective A1' – "To provide for new residential communities and Sustainable Neighbourhood Infrastructure in accordance with approved local area plans", in the dlr County Development Plan 2022-2028. As set out in Table 13.1.3 in Chapter 13 of the County Development Plan 2022-2028, 'Community Facility' is a use that is 'Permitted in Principle', at A1 zoned lands.</p> <p>As set out in Section 9.4.1.2 – 'Jubilee Hall' and Objective HC2 – 'Jubilee Hall' of Chapter 9 in the Draft Plan, it is stated that it is an objective to seek the regeneration of Jubilee Hall as part of the wider re-development of the Western Character Area.</p> <p>Also, Policy OCLAP48 states that,</p> <p><i>'It is Policy to consider positively the change of use of Protected Structures where it can be shown that the structure, character, appearance and setting will not be adversely affected and where its reuse for an alternative purpose is necessary to ensure a viable future for the building(s).'</i></p> <p>The use proposed in the submission is considered generally compatible and would be subject to the development management process when a planning application is submitted.</p> <p>Recommendation No change to Draft Plan.</p>
3.9.6 Section 9.4.3. Areas of Cumulative Heritage Interest – Old Connaught Village Core		
i. Submission notes area identified as "Historic Village Core", as seen in figure 9.3. It requests the expansion of its boundary to include the high stone wall on	<u>B0057</u>	<p>The Executive notes the issue raised and appreciates the information provided.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>the northern side of the road, which incorporates the recessed area, platform and stone steps where the village pump was located. A further request is made to expand the area to include the stable yard associated with Old Connaught House.</p> <p>ii. Submission requests the designation of the village core as an Architectural Conservation Area (ACA).</p>		<p>The Historic Village Core boundary as indicated on Figure 9.3 of the Draft Plan is considered to be an appropriate boundary and it is not proposed to amend the boundary at present. The area, its boundary and its potential designation as a candidate / Architectural Conservation Area would require further appraisal in accordance with Objective HC3 – 'Cumulative Heritage Interest' of the Draft Plan, which states,</p> <p><i>'It is an Objective to protect, enhance and promote Old Connaught's built heritage through the possible designation of the village core as a candidate / Architectural Conservation Area as part of the forthcoming review of the dlr County Development Plan. An indicative boundary is shown in Figure 9.3.'</i></p> <p>Recommendation No change to Draft Plan.</p>
<p>iii. Submission requests that all future planning applications in the village core should be subject to compliance with a specific architectural code. Further requests their specific list of standards and requirements for inclusion in such.</p>	<u>B0057</u>	<p>The Executive notes the issue raised.</p> <p>The Draft Plan takes a plan-led approach to urban design and placemaking guidance.</p> <p>Policy OCLAP3 – 'Urban Design' in Section 4.4.3 of the Draft Plan provides clear guidance for urban design standards in the Old Connaught area.</p> <p>In addition, Policy OCLAP49 – 'Old Connaught Village Core' states,</p> <p><i>'It is Policy that future development at or in proximity to the Historic Old Connaught Village Core (see Figure 9.3) has regard to the distinct character and intrinsic qualities based on the areas historic built form and layout.'</i></p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>The detail of design, landscaping and finishes to proposed buildings and spaces in the Draft Plan area will be assessed and decided upon at consent/planning application stage through the development management process using the design policy framework of the Draft Plan.</p> <p>Recommendation No change to the Draft Plan.</p>
iv. Notes that Old Bawn and Graigueconna are Georgian-style houses, dating from the eighteenth century, and are not regency.	<u>B0058</u>	<p>The Executive notes the issue raised and sees the benefit in clarifying the wording.</p> <p>Recommendation Amend Section 9.4.3 (page 98) as follows:</p> <p>"Of particular interest is the pair of tall portal gateways to Regency <u>Georgian, eighteenth century</u> type houses of Old Bawn and Graigueconna (both Protected Structures)."</p>
v. Notes that a photograph of the group of houses dates from the eighteenth-century, probably from around 1750 instead of early nineteenth century.	<u>B0058</u>	<p>The Executive notes the issue raised and sees the benefit in clarifying the date of the group of houses.</p> <p>Recommendation Amend the caption of the photo in the middle of the bottom row (page 99) as follows:</p> <p>"Group of houses at Old Connaught Avenue from the <u>eighteenth-century</u>."</p>
3.9.7 9.4.4 Integration of New Development		
<p>i. Submission urges care to not lose the character of Old Connaught.</p> <p>ii. The integrity of what is essentially a historical area will be compromised with the levels of planned development.</p>	<u>B0003</u> <u>B0010</u>	<p>The Executive notes the issue raised.</p> <p>One of the strategic objectives of the Draft Plan is to protect and enhance the existing character and heritage of Old Connaught and to integrate and manage new development in a manner which respects</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>the areas unique historical and natural setting, whilst acknowledging the development of new communities.</p> <p>This overarching objective is further supported by policies and objectives in Chapter 9 'Heritage and Conservation' of the Draft Plan, in particular Policy OCLAP50 – 'Historic Character'.</p> <p>An imperative of the Draft Plan is to retain the integrity and character of Old Connaught.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>iii. The plan risks eroding heritage with modern developments. Requests that the plans for the future village centre align with the planning and development process taken in Enniskerry with an emphasis on low-rise, traditionally styled buildings; use of appropriate materials and finishes; a layout that respects existing historic structures and landscape features.</p>	<p><u>B0011</u> <u>B0034</u></p>	<p>The Executive notes the issues raised.</p> <p>Section 4.4.4 'The Village Core' of the Draft Plan acknowledges that, <i>'the existing village core of Old Connaught is rich in heritage and character.'</i></p> <p>The heritage and conservation objectives for the Village Core development framework contained in Table 4.2 indicate,</p> <ul style="list-style-type: none"> • Any development at or in proximity to the Historic Village Core to have regard to the distinct character and intrinsic qualities based on its historic built form and layout (see section 9.4.3, Chapter 9). • Enhance and extend the public realm setting of the Walled Gardens / Ensure that any development in proximity of the Walled Gardens protects, conserves and enhances its setting (see Objective HC1, Chapter 9) <p>In addition, Policy OCLAP49 – 'Old Connaught Village Core' states,</p> <p><i>'It is Policy that future development at or in proximity to the Historic Old Connaught Village Core (see Figure 9.3) has regard to the distinct</i></p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p><i>character and intrinsic qualities based on the areas historic built form and layout.'</i> and</p> <p>Policy OCLAP50 – 'Historic Character' states,</p> <p><i>'It is Policy to ensure the protection of the historical character of Old Connaught and ensure that future development / redevelopment is carried out in a manner sympathetic to its special character, thus ensuring that the distinct character and intrinsic heritage qualities of the Old Connaught area are recognised.'</i></p> <p>It is considered that the overall Draft Plan and in particular Chapter 4, Chapter 5 'Sustainable Urban Village' and Chapter 9 'Heritage and Conservation', include a range of policies and objectives which provide a masterplan framework for the development of the area whilst recognising the special character of the area and heritage rich locality.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>iv. Regarding architecture and construction, materials and finishes should be consistent as each phase of the plan is being implemented to ensure the retention of the area's heritage and vernacular.</p>	<p><u>B0029</u></p>	<p>The Executive notes issue raised.</p> <p>The Draft Plan provides guidance for the proper planning of the Old Connaught area and the detail of design, landscaping and finishes to proposed buildings in the Draft Plan area will be assessed and decided upon at consent/planning application stage through the development management process.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>3.9.8 Section 9.7 Communicating Heritage</p>		
<p>i. Requests that the use of "Victorian" throughout the document be reviewed.</p>	<p><u>B0058</u></p>	<p>The Executive notes the issue raised and concurs with clarifying the wording.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>It is considered that the review of the word "Victorian" would be beneficial.</p> <p>Recommendation Amend Section 9.7 (page 101) as follows:</p> <p>"The strategic level network of open spaces at Old Connaught (see Chapter 8) integrates new public open spaces with existing heritage elements at Old Connaught including inter alia the Victorian <u>eighteenth century dated</u> Walled Gardens, Jubilee Hall, the original entrance gates at Thornhill House, the Old Connaught church and graveyard and the village core."</p>

3.9 Chapter 10 – Infrastructure, Utilities and Flood Risk

Issues	Sub. No.	Executive's Response & Recommendation
3.10.1 Section 10.3.1 Water Infrastructure		
<p>i. Submission from Uisce Éireann raises a number of points / issues:</p> <ul style="list-style-type: none"> • Old Connaught is located within the Greater Dublin Area (GDA) Water Resource Zone, the status of which is amber, indicating it is constrained. Such constraints are an opportunity to develop water efficient or water neutral housing in the LAP area. • The strategic watermain network and Ballyman Reservoir are in place and adequate to serve the area beyond the LAP period. 	B0047	<p>The Executive notes the amber status of the GDA water supply and acknowledges comments received regarding the existing strategic watermain network and Ballyman Reservoir.</p> <p>The higher order dlr County Development Plan 2022-2028 contains Section 10.2.2 'Water and Wastewater – Policy Objectives' which indicates, <i>'it is Council policy to encourage the advancement of rainwater harvesting systems, grey water re-use systems and other water conservation measures in the County, in accordance with best practice.'</i></p> <p>These objectives are also applicable to the Draft Plan.</p> <p>Recommendation No change to Draft Plan.</p>
3.10.2 Section 10.3.2 Wastewater Infrastructure		
<p>i. Submission requests the inclusion of further details in relation to proposed sewerage pipe network designs around the village, to the treatment plant in Shanganagh.</p> <p>ii. Concerns regarding the lack of clarity around sewer system provisions in the Draft LAP.</p>	<p>B0003 B0022 B0030</p>	<p>The Executive notes the issues raised.</p> <p>Uisce Éireann are finalising a drainage area plan for the overall area which is looking at high level solutions and concept designs to connect to the Bray / Shanganagh catchment. They are aware and are supportive of the proposed interim and permanent solutions for wastewater infrastructure contained in the Draft Plan. In addition to the strategic network for wastewater, detailed network design will be prepared for planning applications via the development of land parcels in the site development frameworks in the area.</p> <p>Section 10.3.2 – 'Wastewater Infrastructure' of the Draft Plan sets out the plan-led approach to the provision of a network of strategic wastewater provisions to support the sustainable development of Old</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>Connaught. The Local Authority has and will continue to liaise with Uisce Éireann in relation to the strategic drainage plans for the area.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>iii. Questions whether new properties will be on main drainage and would welcome an opportunity for existing residents to be connected to main drainage.</p> <p>iv. There is a lack of information on how existing homes in the area will be connected to new wastewater infrastructure.</p> <p>v. Notes the negative impact of existing wastewater infrastructure. Encourages the connection of existing homes to a new drainage network when it is being developed, improving quality of life and reducing risk.</p> <p>vi. Requests existing houses on Thornhill Road have their septic tanks linked into new mains drainage.</p> <p>vii. Ferndale Court and other properties on Old Connaught Avenue should be considered for connection under any new wastewater infrastructure schemes to reduce environmental impacts and maintenance burdens.</p> <p>viii. All existing properties should connect to main sewage in the interest of the environment as a priority.</p> <p>ix. Submission requests that a provision be implemented into the LAP which stipulates developers must facilitate the connections of</p>	<p><u>B0013</u> <u>B0017</u> <u>B0019</u> <u>B0038</u> <u>B0045</u> <u>B0049</u></p>	<p>The Executive notes the issue raised and acknowledges comments received.</p> <p>Section 10.3.2 – 'Wastewater Infrastructure' of the Draft Plan indicates that,</p> <p><i>'The Old Connaught area is not currently serviced with strategic wastewater infrastructure, and at present, existing residents own and maintain their own septic tanks. The Draft Plan area is not serviced by an Uisce Éireann wastewater network and there is currently no connection eastwards across the M11 to the existing wastewater network.'</i></p> <p><i>Policy Objective EI3: Wastewater Treatment Systems of the dlr County Development Plan 2022-2028 states that it is a policy that all new developments in areas served by a public foul sewerage network connect to the public sewerage system, directly or indirectly, and that wastewater strategies should promote the changeover of existing septic tanks to collection networks where possible. This is particularly relevant in Old Connaught, given the existing septic tank network in the area.'</i></p> <p>The Draft Plan will therefore provide a route for existing residents to connect to new wastewater collection networks.</p> <p>Developer facilitated connections at no extra cost to existing households is an issue to be determined between the parties concerned.</p>

Issues	Sub. No.	Executive's Response & Recommendation
existing households at no extra cost to existing households.		Recommendation No change to the Draft Plan.
<p>x. Submission from Uisce Éireann raises a number of points / issues:</p> <ul style="list-style-type: none"> • The area lacks a public sewer network and notes the creation of one will be developer driven. • A site and route selection report is required for a strategic pumping station and rising main to cross the M11 and connect into the existing network. • A strategic pumping station is preferable and as indicated in the Draft LAP an interim solution may be possible to open up a first phase of housing. The downstream network has capacity to take this first phase. <p>xi. A longer-term scenario to include all of the strategic reserve, will need an impact assessment on the downstream networks and Uisce Éireann and the Local Authority will continue to work together to develop solutions.</p>	<u>B0047</u>	<p>The Executive notes the submission from Uisce Éireann and acknowledges the issues raised.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>xii. Submissions requests that a pumping station, currently indicated in the ICAS to be located in the Rathmichael LAP area, be moved into the Old Connaught LAP lands. This request is to allow the northern portion of the Old Connaught LAP lands to be serviced by this station, and not the pumping station proposed on Old Connaught Avenue.</p> <p>xiii. Submits that it could be possible to locate the permanent strategic pumping station to be</p>	<u>B0050</u> <u>B0064</u>	<p>The Executive notes the issue raised.</p> <p>The indicative location of the pump station that is indicated in the Part 3 'Options Development and Assessment Report' of the Infrastructure Capacity Assessment Study (ICAS) is in the northern part and within the proposed boundary of the Draft Plan area.</p> <p>The intent indicated in the submission for the provision of a permanent pumping station is welcomed. The proposed alternative location indicated in the submission for a pumping station south of Old Connaught Avenue is noted. The location shown in the Draft Plan in</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>delivered up front instead of the temporary pumping station, this will reduce overall expenditure and ensure that there is no temporary infrastructure required.</p> <p>xiv. Notes that the appropriate location for a strategic wastewater pumping station is within their landholding south of Old Connaught Avenue.</p>		<p>Figure 10.3 is referred to as indicative only and may be subject to change. Section 10.3.2 – 'Wastewater infrastructure' of the Draft Plan indicates that the location identified north of Old Connaught Avenue is indicative only and the ultimate final location of the pump station is subject to further assessment and agreement with Uisce Éireann.</p> <p>Recommendation No change to Draft Plan.</p>
3.10.3 Section 10.4 Drainage Infrastructure		
<p>i. Query regarding the inclusion of Sustainable Drainage System (SuDs) as part of infrastructure.</p> <p>ii. Queries how surface water will be managed, especially with increased hard surfacing. Requests details of any proposed Sustainable Drainage Systems (SuDS).</p> <p>iii. Clarification is sought on the categorisation of attenuation ponds under overarching climate change measures and the purpose of the ponds.</p> <p>Queries whether the water could be used for purposes that help to reduce dependence on treated water for non-drinking uses and as a means to adapt to potential drier conditions as our climate changes.</p> <p>iv. The construction of the proposed North-South link road will increase surface water run-off and flooding on Allies River Road.</p> <p>v. Concerns about worsening flooding in the area due to the potential increased surface water runoff resulting from the implementation of hard surfaces (roads, roofs, paths) in conjunction with new developments.</p>	<p>B0020 B0037 B0037 B0045 B0078</p>	<p>The Executive notes the issue raised.</p> <p>Section 10.4 – 'Drainage Infrastructure' of the Draft Plan features the following policy in relation to Sustainable Drainage System (SuDs) infrastructure, 'Policy OCLAP57 – 'Sustainable Urban Drainage Systems' which states,</p> <p><i>'It is Policy to:</i></p> <ul style="list-style-type: none"> <i>To promote the use and appropriate maintenance of Sustainable Urban Drainage Systems (SuDS) to manage surface and groundwater regimes sustainably. These should be applied to all developments, including new road and public spaces, in line with Appendix 7 (7.1 and 7.2) of the dlr County Development Plan 2022-2028, to suit individual site layouts and local ground conditions.</i> <i>Design and maintenance of SuDS Systems should be in accordance with the Greater Dublin Strategic Drainage Study (GDSDS) and the CIRIA SUDS Manual. The proposed networks should be designed in accordance with Appendix 7 (7.1 and 7.2) of the dlr County Development Plan 2022- 2028, CIRIA C753 'The SuDS Manual' and the Greater Dublin Strategic Drainage Systems (GDSDS).</i> <i>The primary regional pond to serve the Old Connaught area shall be provided at lands identified in Figure 10.4. An additional,</i>

Issues	Sub. No.	Executive's Response & Recommendation
		<p><i>secondary and smaller attenuation pond should be provided at lands also identified in Figure 10.4. These ponds will provide storage to meet attenuation requirements for the 1% of AED and provide the final stage of treatment for water runoff prior to discharge to the public network/stream outside of the Old Connaught LAP area. The ponds may provide amenity and biodiversity benefits in accordance with best design practice.</i></p> <ul style="list-style-type: none"> <i>To pilot and test new green infrastructure installations in the public realm to boost biodiversity and improve surface water management, including the use of permeable materials for surfaces, green roofs and the provision storm water tree trenches / pit.</i> <i>To support the development of soft landscaping in public open spaces and parks, where feasible in accordance with the principles of Sustainable Drainage Systems (SuDS).</i> <p>Section 10.4 Drainage Infrastructure and Policy OCLAP57 provide the policy framework for the incorporation of Sustainable Drainage Systems (SuDs) as part of infrastructure and development.</p> <p>It is considered that there is a robust policy framework in the Draft Plan in relation to surface water management.</p> <p>Recommendation No change to the Draft Plan.</p>
vi. The Office of Public Works (OPW) welcomes Policy OCLAP57 – Sustainable Urban Drainage Systems.	<u>B0043</u>	<p>The Executive notes and acknowledges comments received.</p> <p>Recommendation No change to the Draft Plan.</p>
vii. Submission from EMRA observes that the local authority should be aware of the recent publication of 'Nature Based Management of Urban Rainwater and Urban Surface Water	<u>B0044</u> <u>B0047</u>	<p>The Executive notes and acknowledges comments received.</p> <p>It is recommended that an amendment is made to Policy OCLAP57 – 'Sustainable Urban Drainage Systems' of Chapter 10 'Infrastructure,</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>Discharges – A National Strategy' by the Department of Housing, Local Government and Heritage in May 2024.</p> <p>viii. Submission from Úisce Eireann welcomes the Draft Plan's support of SuDS and green and blue infrastructure enhancement. It notes its alignment with the NPF and the benefits from such an approach.</p> <p>Recommends under Policy OCLAP 57 the use of the hierarchy of discharge outlined in "Implementation of Urban Nature-based Solutions: Guidance Document for Planners, Developers and Developer Agents" to complement the approach to surface water management.</p>		<p>Utilities and Flood Risk' of the Draft Plan to provide for the requested changes in the submissions.</p> <p>Recommendation Amend in part Policy OCLAP57 – Sustainable Urban Drainage Systems (page 108) as follows:</p> <p><i>"It is Policy to:</i></p> <ul style="list-style-type: none"> <i>To promote the use and appropriate maintenance of Sustainable Urban Drainage Systems (SuDS), and in particular nature-based solutions, to manage surface and groundwater regimes sustainably. These should be applied to all developments, including new road and public spaces, in line with Appendix 7 (7.1 and 7.2) of the dlr County Development Plan 2022-2028, to suit individual site layouts and local ground conditions.</i> <i>Design and maintenance of SuDS Systems should be in accordance with the Greater Dublin Strategic Drainage Study (GDSDS) and the CIRIA SUDS Manual. The proposed networks should be designed in accordance with Appendix 7 (7.1 and 7.2) of the dlr County Development Plan 2022- 2028, CIRIA C753 'The SuDS Manual', the Greater Dublin Strategic Drainage Systems (GDSDS) and other relevant guidance documents....."</i>
<p>ix. Queries whether pluvial flooding has been taken into consideration in the draft plan.</p>	B0049	<p>The Executive notes the issue raised.</p> <p>Appendix 1 of the Draft Plan contains the Draft Strategic Flood Risk Assessment for the Old Connaught area in which pluvial flooding is taken into consideration.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>x. Submission recommends the reduction in size of the regional attenuation pond. Further</p>	B0060	<p>The Executive notes the issue raised.</p> <p>Section 10.4 – 'Drainage Infrastructure' of the Draft Plan states that,</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>recommends that each character area should deal fully with its surface water on-site.</p>		<p><i>'Based on the findings of the ICAS, the preferred Drainage Strategy for the Old Connaught area provides for a primary regional attenuation pond in the east of the Plan area, see Figure 10.4. It is proposed that this pond would have an attenuation volume of approximately 12,003m³ with an allowable discharge rate of 133.1l/s and a treatment volume of 4,388m³. To ensure robustness, a secondary and smaller attenuation pond is located to the south of Old Connaught Avenue which should be integrated as part of the residential area (approx. location indicated in Figure 10.4). Additional attenuation features could potentially be incorporated within the landscaping of parks or other appropriate locations.'</i></p> <p>This is considered to be a plan-led approach to the provision of attenuation to support the sustainable development of Old Connaught.</p> <p>The size, design and specific siting of the primary attenuation pond will be further considered during the planning application and development management process. In addition, Section 10.4 of the Draft Plan indicates that additional attenuation features could potentially be incorporated within the landscaping of parks or other appropriate locations.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>xi. Submission notes no need for requirements for the construction of attenuation pond in central character area, as the proposed attenuation pond in the southern character area will provide the necessary capacity for the southern lands and DLR lands in the central character area.</p>	<p><u>B0064</u></p>	<p>The Executive notes the issue raised. The lands in question are in proposed Phase B of the phasing strategy of the Draft Plan as Contained in Chapter 11 – 'Phasing and Implementation'. It is intended that lands in proposed Phase A, which contain the central character area, are to provide for regional attenuation for the Old Connaught area.</p> <p>Recommendation</p>

Issues	Sub. No.	Executive's Response & Recommendation
		No change to Draft Plan.
3.10.4 Section 10.5 Flood Risk Management		
<p>i. Cuilín is subject to intermittent flooding due to topographical influenced run-off into the site. This problem is due to a drain under the M11 becoming obstructed occasionally. Request that adjacent proposed development takes flood risk into consideration.</p> <p>ii. The proposed new vehicular bridge across the M11, and its connection to R119, will exasperate flooding of the nearby section of Crinken Stream.</p> <p>iii. The submission notes concern regarding a lack of detail in the flood prevention proposals and objectives around their property. It notes risks of overflow from existing and proposed infrastructure and cites potential flooding issues deriving from future transport infrastructure.</p> <p>iv. Submission requests clarification that the phasing plan in the draft plan has had proper regard to the flood risk management plan, or whether it is the intention that the entire flood risk management plan to be delivered in phase 1.</p>	<p><u>B0015</u> <u>B0020</u> <u>B0021</u> <u>B0080</u></p>	<p>The Executive notes the issue raised.</p> <p>As set out in Section 10.5 – 'Flood Risk Management' in Chapter 10 of the Draft Plan, Policy OCLAP60 – 'Flood Risk Assessment' states,</p> <p><i>'It is policy to manage flood risk in the Old Connaught LAP area in accordance with the requirements of The Planning System and Flood Risk Management Guidelines for Planning Authorities, DECLG and OPW (2009) and Circular PL02/2014 (August 2014) and to require all proposed developments to carry out a Site-Specific Flood Risk Assessment that shall demonstrate compliance with:</i></p> <ul style="list-style-type: none"> <i>• The Planning System and Flood Risk Management, Guidelines for Planning Authorities (DEHLG/OPW, 2009), as may be revised and/or updated.</i> <i>• The prevailing Dún Laoghaire-Rathdown County Development Plan.</i> <i>• Any SSFRA shall not be required to carry out a Plan-Making Justification Test, given that this exercise was already carried out at County Development Plan-level.</i> <i>• The SSFRA shall pay particular emphasis to site specific mitigation measures and any necessary management measures, as per Appendix B4 of the above 2009 National Guidelines.'</i> <p>and</p> <p>Policy OCLAP61 – 'Flood Risk Considerations' states,</p> <p><i>'It is Policy that proposed development in and adjacent to Flood Zone A and B will include for the management of flooding on site, and within the scope of the SSFRA. Use of the sequential approach should be presented</i></p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p><i>in a Masterplan which should demonstrate that there is no highly vulnerable development within Flood Zones A or B. There should be no loss of floodplain storage for the 1% AEP event and the impact of any changes to ground levels and storage areas as part of flood management proposals should be assessed for the 0.1% AEP flood. As overland flow is the primary source of flood risk, it is important that conveyance routes through the site are maintained. The SSFRA will also need to demonstrate there is no impact in flood risk to third party lands.'</i></p> <p>It is considered that the Draft Plan provides for appropriate considerations and a robust policy framework regarding flood risk within Chapter 10, specifically Policies OCLAP60 and OCLAP61.</p> <p>In regard to flood risk management all applications for development must be accompanied by site specific flood risk assessment. The draft SFRA that is included as an integral part of the Draft Plan considered the overall flood risk management for the area.</p> <p>Recommendation No changes to the Draft Plan.</p>
<p>v. The flood risk management section should incorporate aspects of preparedness, response and recovery elements of the Emergency Management Cycle of the dlr Draft Climate Action Plan 2024 –2029.</p>	<p>B0078</p>	<p>The Executive notes and acknowledges the issues received.</p> <p>Section 3.2 – 'Policy Context' of Chapter 3 – 'Climate Action' of the Draft Plan states,</p> <p><i>'In implementing this Draft Plan, the Council will support relevant provisions contained in the National Climate Change Adaptation Framework (2018), the National Mitigation Plan (2017), the National Climate Action Plan 2024, the National Energy and Climate Plan 2021-2030, dlr's Climate Action Plan 2024-2029.'</i></p> <p>In this regard it is considered that the issue raised in the submission is provided for in the Draft Plan.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		Recommendation No changes to the Draft Plan.
3.10.5 Section 10.5.2 Strategic Flood Risk Assessment		
i. Queries if a full flood risk assessment will be carried out. ii. Concern raised whether a flood risk assessment has been completed for the area.	<u>B0037</u> <u>B0045</u>	The Executive notes the issue raised. A strategic flood risk assessment was carried out for the Old Connaught area and it is contained in Appendix 1 of the Draft Plan and referred to in detail in Chapter 10 – 'Infrastructure, Utilities and Flood Risk' in Section 10.5 – 'Flood Risk Management.' Recommendation No change to the Draft Plan.
iii. The Office of Public Works (OPW): <ul style="list-style-type: none"> • Welcomes the preparation of a Strategic Flood Risk Assessment in the plan making process and the acknowledgement in the Draft LAP of the relevant guidelines. • Welcomes the fact the Local Authority carried out updated flood risk assessments and acknowledges this has produced smaller flood zone extents than the National CFRAM maps. • Acknowledges that the Central Character Area Site Development Framework seems to have avoided what flood zones remain in the area. 	<u>B0043</u>	The Executive notes and welcomes the issues raised. Recommendation No change to the Draft Plan.
iv. The OPW welcome objectives OCLAP 60 and OCLAP 61 in relation to flood risk management. Requests clarity on whether "SFRA" in policy OCLAP 60 is intended to mean "SSFRA".	<u>B0043</u>	The Executive notes the issue raised and concur. It is recommended that bullet point three within Policy OCLAP60 – 'Flood Risk Assessment' is amended.

Issues	Sub. No.	Executive's Response & Recommendation
		<p>Recommendation: Amend Policy OCLAP60 – 'Flood Risk Assessment' (page 111) as follows:</p> <p>"It is policy to manage flood risk in the Old Connaught LAP area in accordance with the requirements of The Planning System and Flood Risk Management Guidelines for Planning Authorities, DECLG and OPW (2009) and Circular PL02/2014 (August 2014) and to require all proposed developments to carry out a Site-Specific Flood Risk Assessment that shall demonstrate compliance with:</p> <ul style="list-style-type: none"> • The Planning System and Flood Risk Management, Guidelines for Planning Authorities (DEHLG/OPW, 2009), as may be revised and/or updated. • The prevailing Dún Laoghaire-Rathdown County Development Plan. • Any SSFRA shall not be required to carry out a Plan-Making Justification Test, given that this exercise was already carried out at County Development Plan level. • <u>Given that a Plan-Making Justification Test was carried out in the SFRA at County Development Plan-level, any SSFRA produced will not be required to carry out this exercise.</u> • The SSFRA shall pay particular emphasis to site specific mitigation measures and any necessary management measures, as per Appendix B4 of the above 2009 National Guidelines."
3.10.6 Section 10.6.1 Electricity		
<p>i. ESB Networks provides essential services regarding building and maintaining the electricity networks in Old Connaught:</p> <ul style="list-style-type: none"> • Welcomes and support the inclusion of policies related to the improvement, development, protection and enhancement of energy infrastructure. 	B0032	<p>The Executive notes and welcomes the issues raised.</p> <p>Recommendation No change to the Draft Plan.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> • There is a need for new transmission infrastructure and upgrades to existing infrastructure in order to ensure ongoing adequacy of local and regional connectivity as well as facilitate the connection of renewable energy resources which will protect Old Connaught's future capacity to facilitate transmission upgrades and the connection of renewable energy resources through distribution infrastructure. • Supports Policy OCLAP62 – ESB, which safeguards the reservation of lands for the provision of a 38kV substation which will ensure adequate capacity for future development. Safeguarding these lands, the facilitation of efficient electricity infrastructure projects can be delivered, disruptions to local services can be minimised and sustainable development in the area can be supported. • ESB aims to shift towards more sustainable energy outputs and notes the implementation of energy strategies to transform Ireland into a competitive, resilient, sustainable and low-carbon (and ultimately post-carbon) economy. Supports the Draft Plan's objectives to deliver an overarching land use strategy at Old Connaught. 		
<p>ii. Requests relocation of the lands identified as Strategic Infrastructure (for the provision of a 38kv substation) to allow conversion of the lands into a recreational area.</p>	B0035	<p>The Executive notes the issue raised and do not agree.</p> <p>Chapter 10 'Infrastructure, Utilities and Flood Risk' including Section 10.6.1 'Electricity' of the Draft Plan sets out Policy OCLAP62 regarding a potential location for a 38kv substation, which states,</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p><i>'It is Policy to safeguard the reservation of lands, as indicated on Figure 10.8, for the provision of a 38Kv ESB station.'</i></p> <p>This is considered to be strategic infrastructure required for the development of the Old Connaught area and the potential location indicated in Figure 10.8 of the Draft Plan is supported by ESB Networks in their submission.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>iii. Submission requests that ESB/EirGrid respond through the draft LAP process as to whether noise and visual impact mitigation can be provided for the planned ESB/EirGrid infrastructure upgrades adjacent their home.</p> <p>iv. Submission requests that the local authority incorporate policies that require screening for noise/transformer hum and visual impact, and to address in writing the safety issues that arise for the occupants of 'Coolnaskerry' as a result of the planned ESB/Eirgrid infrastructure in the LAP area</p>	B0080	<p>The Executive notes the issue raised.</p> <p>The infrastructure proposed for the Old Connaught area is indicated in the Draft Plan. The proposed ESB station preliminary location indicated in Figure 10.8 of the Draft Plan is noted as indicative pending selection and detailed design, which has not yet been determined. It is considered appropriate that during the detailed design and consent stage of planned infrastructure that requests for noise and visual impact mitigation would be more appropriately considered.</p> <p>Recommendation No change to the Draft Plan.</p>
3.10.7 Section 10.6.2 Gas		
<p>i. Submission notes that any works in the vicinity of a Gas Transmission Pipeline must be completed in compliance with the document "Code of Practice for Working in the Vicinity of the Transmission Network" (Procedure No: AO/PR/127; Rev 3; Date: May 2021).</p>	B0001	<p>The Executive notes and acknowledges comments received.</p> <p>Recommendation No change to the Draft Plan.</p>
3.10.8 Section 10.6.3 Renewable Energy		
<p>i. Submission recommends the Local Authority examine the potential of district heating</p>	B0075	<p>The Executive notes the issue raised.</p>

Issues	Sub. No.	Executive's Response & Recommendation
(including from waste heat), commit to carrying out a feasibility exercise (where available and technically feasible) and using heat mapping in support of same in the draft policies, having regard to the DLR CDP, RSES, the NPF and the National Heat Study. Support and encourage similar policies in the draft LAP.		<p>As set out in Section 10.6.3 – 'Renewable Energy' in Chapter 10 of the Draft Plan, Policy OCLAP63 states the following,</p> <p><i>'It is Policy to:</i></p> <ul style="list-style-type: none"> <i>• Encourage and support the development of solar energy infrastructure, including photo voltaic (PV) in appropriate locations. where it is demonstrated that such development will not introduce significant adverse environmental effects.</i> <i>• Support the development of district heat networks and the utilisation of waste heat recovery having due regard to potential environmental impacts typically associated with district heating development.'</i> <p>It is considered that the Draft Plan already provides for appropriate considerations regarding the potential for district heating.</p> <p>Recommendation No changes to the Draft Plan.</p>
ii. Commends the intention to support renewable energy including PV in appropriate locations as localised mitigation action.	<u>B0078</u>	<p>The Executive notes and welcomes comments received.</p> <p>Recommendation No changes to the Draft Plan.</p>
iii. There is a lack of reference to wind and battery energy storage systems which could help to build the desired climate resilient neighbourhood.	<u>B0078</u>	<p>The Executive notes the issue raised and concur.</p> <p>It is recommended Policy OCLAP63 be amended to include wind and battery energy storage systems</p> <p>Recommendation <i>Amend Policy OCLAP63 – Renewable Energy Use (page 112) as follows:</i></p> <p><i>"It is Policy to:</i></p> <ul style="list-style-type: none"> <i>• Encourage and support the development of solar energy infrastructure, including photo voltaic (PV) in appropriate</i>

Issues	Sub. No.	Executive's Response & Recommendation
		<p><i>locations where it is demonstrated that such development will not introduce significant adverse environmental effects. <u>Encourage and support wind and battery energy storage systems.</u></i></p> <ul style="list-style-type: none"> <i>Support the development of district heat networks and the utilisation of waste heat recovery having due regard to potential environmental impacts typically associated with district heating development."</i>
3.10.9 Section 10.7 ICT/Communications		
i. Submission recommends the draft LAP include additional objectives and /or policies to support and facilitate the development telecommunications infrastructure in line with Government policy, including the rollout of 5G.	B0075	<p>The Executive notes the issue raised.</p> <p>As set out in Section 10.7 – 'ICT/Communications' in Chapter 10 of the Draft Plan, Policy OCLAP64 states the following,</p> <p><i>'It is Policy to promote and facilitate the provision of an appropriate telecommunications infrastructure at Old Connaught, including broadband, fibre optic connectivity and other technologies.'</i></p> <p>It is considered that the Draft Plan provides for appropriate considerations regarding the development of telecommunications infrastructure.</p> <p>Recommendation No changes to the Draft Plan.</p>
3.10.10 Section 10.8 Waste Management		
<p>i. Submission recommends the draft LAP include objectives and / or policies to support circular economy principles and reference the EPA's Best practice guidelines for the preparation of resource & waste management plans for construction & demolition projects (2021).</p> <p>ii. Supports the reference to bring centres to support waste management. Raises issue with the lack of</p>	B0075 B0078	<p>The Executive welcomes and acknowledges the comments received.</p> <p>The higher order dlr County Development Plan 2022-2028 contains Section 10.3.2 'Waste – Policy Objectives' which indicates, <i>'it is Council implement the Eastern-Midlands Region Waste Management Plan 2015-2021 and subsequent plans, in supporting the transition from a waste management economy towards a circular economy, to enhance employment and increase the value recovery and recirculation of resources.'</i></p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>the full range of waste management actions addressed under the waste hierarchy.</p> <p>Recommends expanding the section to include supports regarding the right to repair, zero waste shops, enhanced segregation of waste and other mechanisms limiting waste generation and adhering to the waste hierarchy.</p>		<p>These objectives are also applicable to the Draft Plan.</p> <p>In addition, Policy OCLAP65 – 'Waste Management' of the Draft Plan states,</p> <p><i>'It is Policy to develop a network of bring centres at Old Connaught to support waste management at the local level. In order to maximise access to the public, it is a requirement to provide bring centres at the neighbourhood centre and lands identified as an active park.'</i></p> <p>Recommendation No changes to Draft Plan.</p>
<p>iii. Requests the Council to consider the targets set out in the SDGs, specifically SDG12 - Responsible Consumption and Production.</p>	<u>B0075</u>	<p>The Executive notes the issue raised.</p> <p>SDG12 emanates from the UN's Sustainable Development Goals. It is considered that the Draft Plan has a clear emphasis on sustainable development.</p> <p>Recommendation No changes to the Draft Plan.</p>
<p>iv. Advises the Local Authority to consult with their Regional Waste Management Planning Office regarding the development of the LAP.</p>	<u>B0075</u>	<p>The Executive notes and acknowledges the issue raised.</p> <p>Recommendation No changes to the Draft Plan.</p>

3.10 Chapter 11 – Phasing and Implementation

Issues	Sub. No.	Executive's Response & Recommendation
3.11.1 11.3 Old Connaught LAP Phasing Strategy		
<p>i. Requests that infrastructure (roads and traffic management; public transport; drainage and water services; schools, healthcare and community facilities) and the village core are delivered first prior to or in tandem with housing being permitted. Without additional infrastructure, development will lead to significant strain on local services and reduce the quality of life for current and future residents.</p>	<p><u>B0011</u> <u>B0034</u> <u>B0035</u> <u>B0080</u></p>	<p>The Executive notes the issue raised.</p> <p>Chapter 11 - 'Phasing and Implementation' of the Draft Plan set out the phasing strategy for Old Connaught. The objective of the strategy is to provide a blended approach to phasing which incorporates measures which seek to prioritise development in a geographical sequential manner, whilst not unduly restricting development and housing delivery whereupon sufficient infrastructure and services are in place to support sustainable development.</p> <p>The phasing strategy is considered to be a pro-active mechanism to provide clarity and greater certainty regarding the phasing and delivery of new residential development and the extent of essential infrastructure that should be provided to serve and facilitate the development. It focuses on the efficient use of existing infrastructure and maximising development based on infrastructure capacity, and the strategy clearly indicates that significant 'early stage' progression of key strategic infrastructure is required in order to ensure the proper planning and sustainable development of the Draft Plan area.</p> <p>The phasing strategy is considered to be an infrastructure led strategy and comprises a high-level infrastructure framework and focusses on the delivery of enabling infrastructure at a strategic level. As the objective of the Draft Plan is to provide a phased approach to the overall development of the Old Connaught area in a sequential manner to support the existing and new communities, it is proposed to provide supporting infrastructure in tandem with the three phases of development in the overall area.</p> <p>As proposed development progresses across the three phases, there are a range of infrastructure provisions that are required for each phase</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>and these are provided for in Tables 11.1, 11.2 and 11.3 in the Draft Plan.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>ii. Transport Infrastructure Ireland have indicated that flexibility in the phasing and implementation of transport infrastructure in Chapter 11 must have regard to the content of the ICAS and the ABTA within. This is in order to ensure the continued protection of the national road network.</p>	<u>B0018</u>	<p>The Executive notes and acknowledges the issue raised.</p> <p>Policy OCLAP26 – 'Spatial Planning and National Roads' of the Draft Plan states,</p> <p><i>'It is Policy that future transport development in the Draft Plan area shall have regard to the requirements of the Spatial Planning and National Roads Guidelines to protect the National Road Network.'</i></p> <p>Recommendation No change to the Draft Plan.</p>
<p>iii. Enable delivery of services to Bray Emmets GAA Club including drainage, water supply, power, broadband and appropriate transport systems ahead of planned developments.</p>	<u>B0035</u>	<p>The Executive notes the issue raised.</p> <p>The phasing strategy of the Draft Plan provides for the development of the character areas and site development frameworks in a sequential manner. It does not provide for discreet phasing requests as requested.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>iv. Submissions request for the development of a clear and detailed phasing plan outlining the sequence of infrastructure and housing developments with provisions for stakeholders via a roadmap for the area's growth.</p> <p>v. The draft plan should focus on how lands can be activated and delivered in a timely manner, in tandem with the necessary enabling infrastructure.</p>	<p><u>B0040</u> <u>B0049</u> <u>B0060</u> <u>B0064</u> <u>B0080</u></p>	<p>The Executive notes the issue raised.</p> <p>Chapter 11 - 'Phasing and Implementation' of the Draft Plan set out the phasing strategy for Old Connaught. It is considered that the strategy is currently clear and detailed and provides a roadmap for the development of the Old Connaught area in a sustainable manner.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>vi. Submission requests to include associated incremental development over the period of LAP (that is year 1,2,3 etc.)</p>		<p>The phasing strategy comprises an infrastructure led high-level framework that focusses on the delivery of enabling infrastructure for each phase of proposed development.</p> <p>Chapter 11 – 'Phasing and Implementation' of the Draft Plan should be read in conjunction with inter alia Chapter 4 – 'Spatial Strategy and Site Development Frameworks', which provides additional detail with regards to infrastructure provision at a more localised level. In addition, there are a range of policies and objectives throughout the Draft Plan which will inform infrastructure requirements at the scheme level.</p> <p>It is considered therefore that the phasing strategy is sufficiently detailed and provides incremental progression for each phase of development.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>vii. The submission observes that during the implementation of the LAP, the local authority should work to ensure that sustainable transport and neighbourhood infrastructure are delivered in tandem with the delivery of housing. Submission considers that the integration of walking and cycling links, especially to public transport, schools and other local amenities, should be considered for inclusion in the phasing plan provided for in the LAP.</p> <p>The submission notes that the only transport-linked phasing in the draft LAP relates to the provision of road access.</p>	<u>B0044</u>	<p>The Executive notes and acknowledges the issue raised.</p> <p>It is considered that the phasing strategy contained in the Draft Plan sets out a clear sequential approach to the phasing of infrastructure in tandem with development.</p> <p>In infrastructure phasing tables for the three phases of development provide for a range of infrastructure requirements to service the existing and new community in Old Connaught. There is a focus on the provision of active travel to provide links within and beyond each phase in addition to provision of water and wastewater services, parks and open spaces, electricity and telecommunications.</p> <p>Recommendation No change to the Draft Plan.</p>

Issues	Sub. No.	Executive's Response & Recommendation
viii. Recommends that the LAP recognises that the Luas extension is essential to the successful implementation of the LAP and that the Luas extension is included in the phasing plan in the LAP	<u>B0044</u>	<p>The Executive notes and acknowledges the issue raised.</p> <p>In relation to Luas, Section 11.3.7 – 'Medium/Long Term Infrastructure Upgrades' indicates that there are infrastructure projects that are not tied to the phasing strategy and are recommended to be progressed over the medium / long term, or sooner as the opportunity arises, including the Luas Green Line extension.</p> <p>The Draft Plan does recognise that the Luas extension is essential for the development of the area, however the current projected timeframe for delivery to the area as indicated by the NTA in the GDA Transport Strategy is from 2031. In that regard it may be prohibitive to include light rail in the phasing strategy for Old Connaught given the anticipated timeframe for delivery of light rail to the area.</p> <p>Recommendation No change to the Draft Plan.</p>
ix. No development works relating to the future Rathmichael LAP should commence while works under the Old Connaught LAP are ongoing. However, concurrent development could occur if accessible routes are in place to support safe traffic flow and emergency access.	<u>B0045</u>	<p>The Executive notes the issue raised.</p> <p>At present, development in Rathmichael is limited to minor modifications and extensions, until a local area plan is adopted.</p> <p>The pre-draft consultation stage for the proposed Rathmichael LAP ended on May 9th 2025. Following the preparation and publication of the Chief Executive's report on the submissions received during the consultation period, work will begin on a draft Rathmichael area plan.</p> <p>A future Rathmichael area plan, when adopted, may include a phasing strategy to ensure the coordinated planning and delivery of essential infrastructure in the area and examine the relationships to adjoining areas include Old Connaught.</p> <p>Recommendation</p>

Issues	Sub. No.	Executive's Response & Recommendation
		No change to the Draft Plan.
<p>x. Submission requests that no housing construction, including social & affordable housing construction, in the LAP area will be commenced until the Neighbourhood Centre facilities and services have commenced construction.</p> <p>The neighbourhood centre would likely not be commenced until 2034 due to the wording of the phasing table in the draft plan.</p> <p>Submission requests that the delivery of the neighbourhood centre be moved from phase B to phase A to provide the necessary services to the new residents of phase A and achieve a 10-minute neighbourhood as soon as possible.</p>	<p><u>B0049</u> <u>B0057</u> <u>B0080</u></p>	<p>The Executive notes the issue raised.</p> <p>Section 5.4 – 'Multi-Functional Neighbourhood Centre and Employment' and Section 5.4.1 of the Draft Plan is focused on ensuring the delivery of a multifunctional neighbourhood centre at Old Connaught to provide a range of services for the community and achieve the sustainable urban village concept.</p> <p>Section 5.4.2 gives further context,</p> <p><i>'In line with its relatively undeveloped nature, Old Connaught is not currently identified in the retail hierarchy for the County, in terms of retail centre type. As set out in Table 7.2 of the dlr County Development Plan 2022-2028, Old Connaught is identified as a 'Key Development Area', the strategy of which is the "Development of sustainable mixed-use urban villages in accordance with approved Local Area Plans/Planning Scheme. Retail floorspace in line with planned population levels.'</i></p> <p>Section 5.4.4 outlines that,</p> <p><i>'An independent assessment of floorspace requirements for retail and service uses to support planned levels of population growth at Old Connaught was undertaken to inform this Plan.'</i></p> <p>This assessment noted that the projected population growth would substantiate the development of a Neighbourhood Centre.</p> <p>Table 11.2 - Old Connaught Phase B – Infrastructure Phasing Table therefore specifies the requirement for the Neighbourhood Centre and civic plaza as,</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p><i>'Planning permission for the Neighbourhood Centre and civic plaza shall be in place, or permitted in tandem with, proposals for residential development within Phase B. Construction of the Neighbourhood Centre to take place at an early stage in the development of Phase B lands.'</i></p> <p>It is therefore considered that the provision of the Neighbourhood Centre is an essential part of the development of Old Connaught, and it is therefore phased in a sequential manner in phase B, to support the planned population growth of the area.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>xi. Submission recommends that the phasing strategy allow all three major developers who own land in the area to begin construction at the same time to increase market competitiveness and produce value.</p> <p>xii. Submission notes there is no justification for placing their lands as somehow subsidiary to Phase A, states their lands can deliver upon the key objectives of the LAP, in terms of necessary infrastructure, placemaking, open space and retail/retail services immediately.</p>	<p><u>B0050</u> <u>B0064</u></p>	<p>The Executive notes the issues raised.</p> <p>Chapter 11 – 'Phasing and Implementation' of the Draft Plan outlines that the phasing strategy aims to ensure the coordinated planning and delivery of essential infrastructure and services in tandem with population growth and development.</p> <p>The phasing strategy was developed having regard to the Planning and Development Act 2000 and the Section 28 Guidelines, 'Local Area Plans – Guidelines for Planning Authorities' (2013), which indicates that local area plans for newly developing area should include a sequential development and phasing programme.</p> <p>In addition, the Council prepared the ICAS to provide a high-level implementation plan to set out the strategic infrastructural and service requirements for each successive phase of development in Old Connaught and the findings of this study informed the preparation of the phasing strategy for the Draft Plan.</p> <p>It is therefore considered that the sequential geographical phasing strategy for Old Connaught is evidence based, is clearly set out and</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>established in the Draft Plan and is not recommended to be amended by the Executive.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>xiii. The submission requests that the Council acknowledge their role and responsibility regarding the delivery of infrastructure, as set out within the phasing requirements of the Draft LAP.</p>	<p><u>B0060</u></p>	<p>The Executive notes the issue raised.</p> <p>It is considered in Chapter 11 and Section 11.4 – 'Implementation' of the Draft Plan, that the Local Authority has clearly outlined its role and responsibility in the delivery and implementation of the Draft Plan by stating, '<i>The Local Authority may need to utilise its wide range of statutory powers and responsibilities to achieve the objectives of the Draft Plan.</i>' and 'the Local Authority also has a wide range of functions in housing, transport, development of amenities, economic development, infrastructure delivery and community involvement that can support the implementation of the Draft Plan in practice.'</p> <p>It is also recognised that the delivery and implementation of the Draft Plan will require a concerted co-ordinated approach so that the infrastructure programmes are progressed in conjunction with landowners, state agencies, central government and other infrastructure providers.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>xiv. A lack of clarity regarding funding and infrastructure delivery intentions.</p> <p>xv. Requests the Planning Authority to address if the adoption of the draft LAP is premature on grounds of the extent of essential infrastructure which is not in place, and which has no confirmed timeframe, funding or plans for delivery, including water and transport infrastructure.</p>	<p><u>B0057</u> <u>B0060</u> <u>B0080</u></p>	<p>The Executive notes the issue raised.</p> <p>Chapter 11 and Section 11.4.1 – 'Infrastructure Funding' of the Draft Plan provide clear policy direction in relation to infrastructure delivery and funding.</p> <p>Objective PI3 – 'Statutory Development Contribution Scheme' states,</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>xvi. Submission criticises the lack of development contribution detail in the LAP and requests that the LUAS connection to Fassaroe be included in any development contribution scheme set up for the area.</p>		<p><i>'It is an Objective to progress a statutory development contribution scheme to fund public infrastructure and facilities benefiting development in the Draft Plan area.'</i></p> <p>Objective PI4 – 'Infrastructure Funding and Delivery' states,</p> <p><i>'It is an Objective to engage with inter alia the Department of Housing, Local Government and Heritage, the Department of Transport, the National Transport Authority, Transport Infrastructure Ireland, Uisce Éireann, ESB, other relevant statutory agencies, and landowners, where appropriate, to bring forward key projects and funding streams in order to facilitate the timely and successful implementation of development in the LAP areas.'</i></p> <p>Objective PI5 – 'Funding Mechanisms' states,</p> <p><i>'It is an Objective to consider all potential public and private funding streams for the delivery of enabling infrastructure and facilities to support the implementation of the Draft Plan.'</i></p> <p>In addition, in relation to plans for delivery of infrastructure in the Draft Plan, Chapter 11 - 'Phasing and Implementation' sets out the phasing strategy for Old Connaught. It is considered that the strategy is currently clear and detailed and provides a roadmap for the development of the Old Connaught area in a sustainable manner.</p> <p>The phasing strategy comprises an infrastructure led framework that focusses on the delivery of enabling infrastructure for the phases of proposed development.</p> <p>Recommendation No change to the Draft Plan.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>xvii. The draft plan's lacks flexibility regarding timing and features unduly prescriptive phasing requirements. This lack will lead to viability issues and prevent the construction of any units in the LAP area before 2028. The draft plan should show flexibility and focus on how lands can be activated and delivered in a timely manner, in tandem with the necessary enabling infrastructure.</p> <p>xviii. Submission recommends an increase in housing numbers earlier in the phasing and at a moderated residential density to fund the key enabling infrastructure as set out in the Draft LAP.</p>	<p><u>B0060</u> <u>B0064</u></p>	<p>The Executive notes the issues raised and does not concur.</p> <p>The Draft Plan does allow for deviations/flexibility in the phasing strategy whilst aiming to maintain the overall approach to phasing in a sequential manner across the Old Connaught area.</p> <p>Policy OCLAP66 – 'Phasing Strategy' of the Draft Plan states in part that it is a policy that,</p> <p><i>'Deviations from the phasing strategy may be considered on a case-by-case basis, and agreed to the satisfaction of the Planning Authority, to allow for unforeseen circumstances beyond the reasonable control of an individual developer or the Local Authority. Deviations may comprise viable alternatives or interim measures that accord with the overall objectives of the Draft Plan. Any interim proposals must ensure and maintain consistency with the build-out or 'longterm' infrastructure objectives of the Draft Plan.'</i></p> <p>It is considered that the Draft Plan does provide further flexibility in relation to phasing by way of sub phasing in Phase 1 as indicated in Section 11.3.1 – 'Old Connaught - Phase A' which can provide the early delivery of new homes in sub-phase 1.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>xix. Submission notes the phasing strategy conflicts with the provisions of the development plan guidelines.</p>	<p><u>B0064</u></p>	<p>The Executive notes the issue raised and does not concur.</p> <p>The Section 28 Guidelines, 'Local Area Plans – Guidelines for Planning Authorities' (2013), provide guidance on the phasing and sequencing of development as part of the local area plan, plan-making process. The Section 28 Local Area Plan Guidelines state the following:</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p><i>"Local area plans for newly developing areas, in particular, should include a sequential development and phasing programme linked with any necessary investment in water services, public transport, community facilities, and schools."</i></p> <p>The phasing strategy set out in the Draft Plan has had regard to inter alia the above Section 28 Guidelines. It is considered that a balanced approach to phasing is required which ensures the delivery of enabling infrastructure and services to support sustainable development while also having regard to the urgent need to deliver housing.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>xx. Submission requests text addition to Objective OCLAP66 (outlined in bold): Future development, as appropriate, shall accord with the Phasing Strategy for the Draft Plan or as otherwise agreed with the Local Authority"</p>	<p>B0064</p>	<p>The Executive notes the issue raised.</p> <p>The request relates to Policy OCLAP66 – 'Phasing Strategy' of the Draft Plan which states,</p> <p><i>'It is Policy that:</i></p> <ul style="list-style-type: none"> <i>Future development, as appropriate, shall accord with the Phasing Strategy for the Draft Plan. Planning applications shall include a 'Consistency Statement' setting out how the objectives of the Phasing Strategy, as relevant and applicable to the proposal for development, will be achieved.</i> <i>Deviations from the phasing strategy may be considered on a case-by-case basis, and agreed to the satisfaction of the Planning Authority, to allow for unforeseen circumstances beyond the reasonable control of an individual developer or the Local Authority. Deviations may comprise viable alternatives or interim measures that accord with the overall objectives of the Draft Plan. Any interim</i>

Issues	Sub. No.	Executive's Response & Recommendation
		<p><i>proposals must ensure and maintain consistency with the build-out or 'longterm' infrastructure objectives of the Draft Plan.'</i></p> <p>It is considered that the second bullet point of this policy provides sufficient flexibility and that the requested change is not considered necessary or recommended.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>xxi. Request for the phasing of required primary and secondary schools is set out in the LAP Phasing and Implementation Chapter and include a requirement for schools to be under construction prior to the commencement of the corresponding housing.</p>	<p>B0080</p>	<p>The Executive notes the issue raised.</p> <p>The Department of Education has identified requirements for school facilities to support the sustainable development of Old Connaught, see Section 5.2.1.1 – 'Education' of the Draft Plan.</p> <p>The assessment and timeframe for the establishment of new education facilities will be undertaken by the Department of Education, in liaison with the Local Authority, taking into account a number of factors, including the pace of delivery of the expected additional residential development in the school planning areas, associated enrolments, demographic data and the capacity in existing schools in the areas. The Local Authority will continue to engage with the Department of Education to co-ordinate the timely delivery of new schools to support the sustainable development of the Old Connaught area.</p> <p>There are objectives and policies in Chapters 5 and 11 of the Draft Plan to enable this.</p> <p>For instance, Objective PI1 – 'Phasing of Education' states,</p> <p><i>'It is an Objective to engage with the Department of Education to co-ordinate the timely delivery of new schools to support the sustainable development of the Draft Plan area.'</i></p>

Issues	Sub. No.	Executive's Response & Recommendation
		Recommendation No change to the Draft Plan.
xxii. The submission requests that no new houses in the LAP area be occupied in any phase until bus services and bus gates are operational.	B0080	<p>The Executive notes the issue raised.</p> <p>Section 11.3.5 – 'Phasing of Public Transport – Bus Services' of the Draft Plan indicates that,</p> <p><i>'In the short to medium term, it is proposed that growth at Old Connaught will be underpinned primarily by a bus based public transport system. The operational elements of the future bus service including specific routing, frequencies, and stop locations, are subject to further assessment to be conducted by the National Transport Authority (NTA). The Council will engage with the NTA to encourage and facilitate the delivery of public transport infrastructure in a timely manner to support planned population growth in the Old Connaught area. As set out in Section 6.6.3 of Chapter 6 it is an Objective to engage with the NTA, as the responsible statutory body, to facilitate the extension of the bus network to provide high frequency bus services to support planned population growth in the Old Connaught area.'</i></p> <p>In regard to bus gates, Section 6.6.3 – 'Public Transport Network' of the Draft Plan indicates that, it is intended that the bus gates at Old Connaught will only be introduced after the delivery of the requisite area-wide road infrastructure to support their implementation. It is not intended or recommended to have the bus gates in operation prior to the occupation of new homes.</p> <p>Recommendation No change to the Draft Plan</p>
3.11.2 11.3.1 Old Connaught – Phase A		

Issues	Sub. No.	Executive's Response & Recommendation
<p>i. Concerns over the lack of requirement to provide a link road between Ferndale Road and the proposed north-south link road until Phase A sub-phase 2. An additional 450 units cannot be supported by existing infrastructure capacity due to the current volume of traffic on Old Connaught Avenue.</p> <p>ii. Request for completion of link between Ferndale Road and North-South Distributor Road be completed before any housing construction begins.</p> <p>iii. The proposed link roads around Ferndale Court should be completed before the commencement of major construction works, to reduce disruption for residents.</p>	<p><u>B0012</u> <u>B0045</u></p>	<p>The Executive notes the issues raised.</p> <p>Section 11.3.1 Old Connaught – Phase A', of the Draft Plan, provides the basis for the development of Phase A and sub-phase 1 in Old Connaught.</p> <p>It indicates, that based on an assessment of infrastructure requirements, Phase A incorporates an initial sub-phase ('sub-phase 1') where limited residential development may be facilitated (c. 450 no. units), supported by existing infrastructure capacity, interim measures including wastewater infrastructure and additional enabling infrastructure proportionate to the scale of development. This reasoning was because of the proximity of this part of Phase A to existing public transport, services and facilities.</p> <p>In this regard it is not recommended to include the proposed link road between Ferndale Road and north-south road in sub-phase 1 as it is considered that development in this area can be accommodated by the efficient use of existing infrastructure in the area with additional enabling infrastructure as indicated in Table 11.1 'Old Connaught Phase A – Infrastructure Phasing Table' of the Draft Plan.</p> <p>Recommendation No change to the Draft Plan</p>
<p>iv. Phase 1 could bring 1,000 residents to the area with no upgrade to current infrastructure and resources thus impacting existing residents and their surroundings via,</p> <ul style="list-style-type: none"> • Increased Traffic Congestion • Further traffic pressures on the already busy Old Connaught Avenue/R761 junction Leaving area without insufficient transport, 	<p><u>B0017</u> <u>B0046</u> <u>B0049</u> <u>B0057</u> <u>B0063</u> <u>B0066</u> <u>B0080</u></p>	<p>The Executive notes the issues raised.</p> <p>Section 11.3 – 'Old Connaught LAP Phasing Strategy' of the Draft Plan indicates that,</p> <p><i>'While the phasing strategy focusses on the efficient use of existing infrastructure and maximising development based on infrastructure capacity, it is highlighted that significant 'early stage' progression of key</i></p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>sewage and other infrastructure in the event of an economic downturn.</p> <ul style="list-style-type: none"> • Failed delivery of 10-Minute Neighbourhood • Inability to access education via active travel. • Phase 1 being built on septic tanks, and this is not consistent with the stated sustainable nature of the plan. 		<p><i>strategic infrastructure is ultimately required in order to ensure the proper planning and sustainable development of the Draft Plan area.'</i></p> <p>Table 11.1 'Old Connaught Phase A – Infrastructure Phasing Table' of the Draft Plan specifies the following infrastructure to be delivered before or in tandem with the first 450 units in sub-phase 1 and a second tranche of linked and additional infrastructure to correspond with the remaining build out of the Phase A area.</p> <p>Table 11.1 requires the following infrastructure to be progressing and assessed for sub-phase 1,</p> <ul style="list-style-type: none"> • Partial delivery of the new north-south link road (connecting Old Connaught Avenue and Crinken Lane / Ballybride Road) adjoining Phase A residential plots. • Active Travel Infrastructure • Wastewater pumping station • Wastewater network connection - interim proposal to install a rising main in the footpath duct in the Old Connaught Avenue overbridge (subject to further assessment) / permanent proposal for a trenchless motorway connection to existing wastewater network to the east. • Incremental expansion of the water, wastewater and drainage networks. • Primary area wide attenuation pond/ Interim measures. • Electricity infrastructure upgrades <p>The Draft Plan proves that either an interim or permanent wastewater infrastructure to be progressed in Phase A. Therefore, it is considered that Phase A is not planned to be built using septic tanks.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>Recommendation No change to the Draft Plan</p>
<p>v. Supports the need for commencement of the new link from Old Connaught Avenue onto the M11 prior to the beginning of Phase A development.</p>	<p><u>B0038</u></p>	<p>The Executive notes the issue raised.</p> <p>In Table 11.1 the progression of a new road and bridge over the N11 to the Dublin Road (including link connections) or the N11/M11 Junction 4 to Junction 14 Improvement Scheme in linked with sub-phase 2 and is considered to be an important step towards delivering the overarching vehicular movement strategy for the area. The 'early stage' progression of this strategic transport infrastructure is fundamental to ensure the proper planning and sustainable development of Phase A 'sub-phase 2', and subsequent development phases across the Draft Plan area.</p> <p>Recommendation No change to the Draft Plan</p>
<p>vi. Submission suggests that the proposed phasing for the construction of the M11 overbridge in the draft plan is premature until a final decision is made on the status on configuration of the Junction 5 upgrade, as per the N11/M11 Junction 4 to 14 Improvement Scheme.</p> <p>Requests also to move M11 overbridge to Phase C as the ICAS does not specify its requirement in phase A.</p>	<p><u>B0050</u> <u>B0064</u></p>	<p>The Executive notes the issue raised.</p> <p>It is not considered that the proposed phasing for the progression of the M11 overbridge is premature pending a final decision on the status on configuration of the Junction 5 upgrade, as per the N11/M11 Junction 4 to 14 Improvement Scheme.</p> <p>Both Chapters 6 and 11 in the Draft Plan provide the rationale for the phasing and progression of the M11 overbridge or the N11/M11 Junction 4 to Junction 14 Improvement Scheme, in relation to the overall transport and phasing strategy for the Old Connaught area. A preferred route option for the N11/M11 scheme, included details for the junction 5 upgrade, was published by TII in 2021, before the scheme was suspended.</p> <p>The Draft Plan provides for the phasing of either of these infrastructure elements.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>It is not recommended to move the M11 overbridge to Phase C as requested in the submission.</p> <p>Recommendation No change to the Draft Plan</p>
vii. Submission requests the inclusion of the proposed bus gate in Phase A: Sub-Phase 2.	<u>B0057</u>	<p>The Executive notes the request.</p> <p>It is not recommended to include the proposed bus gate in Phase A sub-phase 2, as the Draft Plan indicates in Section 6.6.3 of the Draft Plan that,</p> <p><i>"It is intended that the bus gates at Old Connaught will only be introduced subsequent to the delivery of the requisite area-wide road infrastructure to support their implementation."</i></p> <p>It is considered that implementing the bus gates before the completion of key pieces of infrastructure would not be appropriate transport planning and is therefore not recommended.</p> <p>Recommendation No change to the Draft Plan</p>
viii. Submission notes there is no need for any phasing constraints on the delivery of pumping stations as this is a statutory body function and limits flexibility.	<u>B0064</u>	<p>The Executive notes the issue raised and does not believe that there are phasing constraints in relation to the delivery of a pumping station, as the progression and delivery of such is programmed into Phase A of the overall phasing strategy.</p> <p>Recommendation No change to the Draft Plan</p>
ix. Submission recommends the identification of additional local network improvements, focused on active travel and bus enhancements, which can be implemented to enable a substantial	<u>B0064</u>	<p>The Executive notes the issue raised.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>increase in housing which can be delivered before the progression of a new road and bridge over the N11 to the Dublin Road.</p>		<p>The overall phasing strategy for Old Connaught is to provide a co-ordinated approach to the development of the area based on an evidenced based assessment.</p> <p>Whilst saying that deviations from the strategy are provided for in the Draft Plan by way of Policy OCLAP66. It indicates that deviations from the phasing strategy may be considered on a case-by-case basis, to allow for unforeseen circumstances beyond the reasonable control of an individual developer or the Local Authority. Deviations may comprise viable alternatives or interim measures that accord with the overall objectives of the Draft Plan.</p> <p>Tables 11.1 to 11.3 of the Draft Plan provide for the phasing of active travel in each phase and indicate,</p> <p><i>'Active travel infrastructure, as per the requirements of the Old Connaught active travel network, to be determined and agreed with the Planning Authority and included as part of planning applications for development.'</i></p> <p>It is also considered that the Draft Plan already provides for sufficient active travel and bus enhancements as evidenced in Figure 6.15 - 'Proposed Active Travel Network for Old Connaught (Primary development area)' and Figure 6.18 - 'Proposed Public Transport Network for Old Connaught (Primary development area)'.</p> <p>Recommendation No change to the Draft Plan</p>
3.11.3 Section 11.3.2 Old Connaught – Phase B		
<p>i. St. Gerards School supports the proposed link roads between Thornhill Road and Ballyman Road and Old Connaught Avenue and Thornhill Road being delivered as a part of Phase B, ensuring</p>	<p>B0033</p>	<p>The Executive notes and acknowledges the issue.</p> <p>Recommendation No change to the Draft Plan</p>

Issues	Sub. No.	Executive's Response & Recommendation
population growth occurs in tandem with necessary infrastructure upgrades.		
3.11.4 Section 11.3.3 Old Connaught - Phase C		
<p>i. Submission notes a change is required to the phasing of the North-South Distributor Road. The connection to Crinken Lane is required early given the gravity sewer serving most of Rathmichael will run south down Ballybride Road into their lands. Recommends a move to phase A.</p> <p>Submission suggests the prioritisation of the proposed north-south link road in the draft plan's phasing strategy. This is suggested to improve access to the LAP area via Crinken Lane.</p>	B0050	<p>The Executive notes the issue raised.</p> <p>The Executive has considered the contents of the submission and consider that an amendment to the Draft Plan can be recommended to enable the progression of strategic infrastructure at an earlier stage than that anticipated by the phasing strategy, as considered appropriate.</p> <p>This will provide some further flexibility in the delivery of strategic infrastructure in the area above that already provided for in Policy OCLAP66.</p> <p>Recommendation Amend Section 11.3.8 'Infrastructure Delivery' (page 123) as follows:</p> <p>"....Notwithstanding, deviations from the phasing strategy may be considered on a case-by-case basis, and agreed to the satisfaction of the Planning Authority, to allow for unforeseen circumstances beyond the reasonable control of an individual developer or the Local Authority. Deviations may comprise viable alternatives or interim measures that accord with the overall objectives of the Draft Plan. Any interim proposals must ensure and maintain consistency with the overall infrastructure objectives of the LAP. Early engagement with the Planning Authority in this regard will be an essential prerequisite. <u>The overall phasing strategy does not seek to inhibit the progression of strategic infrastructure at an earlier stage than anticipated by the phasing strategy. Deviations should be agreed on a case by a case basis with the Planning Authority, as considered appropriate.</u>"</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>ii. Submission requests that strategic reserve lands in Phase C be moved to an earlier phase. The rationale provided in the submission is linked to previous requests in submission related to early North-South Link Road completion and pumping station relocations.</p>	<p><u>B0050</u></p>	<p>The Executive notes the issue raised.</p> <p>Section 11.3.3 – 'Old Connaught - Phase C' of the Draft Plan outlines that</p> <p><i>'While the lands are not currently zoned for residential development they are identified under the current County Development Plan as a Strategic Land Reserve, indicating potential for residential development in the long term'</i> and also elaborates that,</p> <p><i>'In the event of a future zoning change, the progression of residential development at Phase C would be subject to the incremental provision of enabling infrastructure set out in Table 11.3. As the subject lands are not currently zoned for residential development, the Site Development Framework progressed for the Old Connaught Northern Character Area – see section 4.4.8, Chapter 4 – has not assessed the lands at the same level of detail as that for the existing 'A1' zoned land at Old Connaught. Table 11.3 therefore, provides an overarching guide with regard to the provision of known strategic infrastructure requirements with the intention that this is further assessed and determined through the development management process.'</i></p> <p>Given the current zoning objective status of the lands, it is not considered appropriate to recommend moving the lands to an earlier phase of development.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>3.11.5 Section 11.3.4 Phasing of Education</p>		
<p>i. Submission from the Department of Education states their support for Objective PI1 - Phasing of Education and encourages engaging with the Department to facilitate the timely delivery of new</p>	<p><u>B0076</u></p>	<p>The Executive notes the issue raised.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>schools. Notes that the development of phase A and B, which could see the development of 2,400 units and a population growth of 6,500, could trigger the need for a post primary school site.</p> <p>All enabling infrastructure required to develop and operate school facilities should be provided in advance of the need for such schools.</p>		<p>The Local Authority will continue to engage with the Department of Education to co-ordinate the timely delivery of new schools to support the sustainable development of the Old Connaught and wider area.</p> <p>Recommendation No change to the Draft Plan.</p>
3.11.6 Section 11.3.9 Existing Residential Land Uses		
<p>i. The Draft Plan appears to have been developed without any consideration of existing homeowners/occupiers particularly those at the eastern end of the area.</p> <p>It is anomalous for the draft plan to show existing one-off properties along Old Connaught Avenue being retained in the wider context of development in the area.</p>	<u>B0017</u>	<p>The Executive notes the issue raised.</p> <p>Section 11.3.9 of the Draft plan indicates that there are a number of existing residential properties located within existing 'A1' zoned lands at Old Connaught. Minor modifications and extensions to existing residential properties may be considered, on a case-by-case basis, separate to the phasing strategy for the Draft Plan area, save for in instances where specific infrastructure requirements are identified and relate to the subject property. All proposals for the significant re-development of existing residential properties for residential development will be subject to the phasing strategy as set out in the Draft Plan.</p> <p>In addition, Section 5.3.4.1 'Residential Density' of the Draft Plan indicates in Policy OCLAP17 – 'Plan-Led Approach to Residential Density' that,</p> <ul style="list-style-type: none"> • <i>Residential density at lands including regeneration and infill sites will be assessed on a case-by-case basis by the Planning Authority. Such sites may define their own density (as agreed by the Planning Authority) in response to inter alia the scale and form of surrounding development.</i>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>It is not considered that the Draft Plan will inhibit redevelopment, if required, of individual properties on Old Connaught Avenue or elsewhere in the Draft Plan area.</p> <p>Recommendation No change to the Draft Plan.</p>
3.11.7 Section 11.4.1 Infrastructure Funding		
i. Submission suggests that the LAP area be put forward to the government as Transport Oriented Development (TOD) following a review of the draft LAP. Notes that TODs receive priority funding for infrastructure investment according to the draft revised NPF.	B0050	<p>The Executive notes the issue raised and this will be considered.</p> <p>It is noted that in 2023 the area was previously put forward to be considered as an opportunity site for Transport Oriented Development (TOD) and was not chosen at that time.</p> <p>Recommendation No change to the Draft Plan</p>
ii. Notes that the section number of the Planning Act related to development contributions is missing	B0058	<p>The Executive notes issue raised and concurs that the information should be added.</p> <p>Recommendation Amend Section 11.4.1 (page 123) as follows:</p> <p>"It is considered that a scheme provided for under Sections <u>48-49</u> of the Planning and Development Act 2000 (as amended), or corresponding mechanism provided for under the Planning and Development Act 2024, comprises a potential mechanism to fund strategic infrastructure benefitting development in the Draft Plan area."</p>
iii. Due to the exempt status of state-led residential development from development contributions, the draft plan risks undermining the delivery of social and physical infrastructure needed for the LAP area.	B0060	<p>The Executive notes the issue raised and is aware of this situation.</p> <p>The Draft Plan provides for these objectives in relation to infrastructure funding and delivery.</p> <p>Objective PI4 – 'Infrastructure Funding and Delivery',</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p><i>'It is an Objective to engage with inter alia the Department of Housing, Local Government and Heritage, the Department of Transport, the National Transport Authority, Transport Infrastructure Ireland, Uisce Éireann, ESB, other relevant statutory agencies, and landowners, where appropriate, to bring forward key projects and funding streams in order to facilitate the timely and successful implementation of development in the LAP areas.'</i></p> <p>Objective PI5 – 'Funding Mechanisms',</p> <p><i>'It is an Objective to consider all potential public and private funding streams for the delivery of enabling infrastructure and facilities to support the implementation of the Draft Plan.'</i></p> <p>Recommendation No change to the Draft Plan</p>

3.11 Chapter 12 – Monitoring and Evaluation

Issues	Sub. No.	Executive's Response & Recommendation
i. Recommends that a monitoring programme is put in place to act as an appropriate 'back stop' to ensure that the LAP lands can be developed in an appropriate fashion.	<u>B0064</u>	<p>The Executive notes the issue raised.</p> <p>Section 12.4 'Monitoring Framework' of the Draft Plan contains a table that will serve to strategically evaluate the spatial strategy, site development frameworks, phasing and implementation within Chapter 4 and Chapter 11 respectively.</p> <p>In addition, Policy OCLAP67 – Monitoring and Evaluation indicates,</p> <p><i>'It is Policy to establish a plan monitoring framework to strategically evaluate the progress of the Draft Plan.'</i></p> <p>Therefore, such a request to implement a monitoring programme has been considered in relation to the Draft Plan.</p> <p>Recommendation No change in the Draft Plan.</p>
ii. The HSE seek clarification regarding the definition of a healthy place and metrics utilised to assess the health of Old Connaught currently and in the future during the period of the LAP.	<u>B0078</u>	<p>The Executive notes the issues raised. It is considered that the suggestions are worthwhile but are not presently within the legislative remit of a local area plan.</p> <p>Recommendation No change to Draft Plan.</p>
iii. The HSE indicate that the proposal in the plan to embrace the Avoid-Shift-Improve approach presents an opportunity to measure health impact via improvements in local air quality and changes to the noise environment.	<u>B0078</u>	<p>The Executive notes and concurs with the issue raised.</p> <p>Recommendation No change to Draft Plan.</p>
iv. The HSE recommend including health related data (e.g. air quality, noise, access to green spaces, active travel journeys taken) to monitor the	<u>B0078</u>	<p>The Executive notes the issues raised. It is considered that the suggestions are worthwhile but are not presently within the legislative remit of a local area plan.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>effectiveness of the Plan. Indicators evaluated should be SMART indicators.</p> <p>From a public health perspective progress on the creation of the climate resilient county and the creation of an inclusive and healthy county should be captured.</p> <p>Suggests including an assessment of potential "maladaptation" in the context of climate change.</p>		<p>Recommendation No change to Draft Plan.</p>

3.12 Appendix 1 – Strategic Flood Risk Assessment

Issues	Sub. No.	Executive's Response & Recommendation
i. The Office of Public Works note that any damage to subsurface drainage infrastructure, as highlighted in the SFRA, should be rectified.	<u>B0043</u>	<p>The Executive notes the issue raised and will investigate as an operational issue.</p> <p>Recommendation No change to Draft Plan.</p>
ii. The Office of Public Works welcome the inclusion of proposed attenuation pond locations in the Draft LAP but notes these should be included or referenced in the SFRA.	<u>B0043</u>	<p>The Executive notes the issue raised.</p> <p>The requested reference to the proposed attenuation ponds is already included in Appendix 1 Draft Strategic Flood Risk Assessment of the Draft Plan in Section 1.9 – 'Flood Risk Management – Policy Response' under viii. Surface Water Management.</p> <p>Recommendation No Change to Draft Plan.</p>
iii. The Office of Public Works note the attenuation pond, proposed for the Central Character Area, could be used to deal with the current pluvial risks identified in the SFRA.	<u>B0043</u>	<p>The Executive notes the issue raised.</p> <p>It is considered that pluvial flood risk can generally be managed through site design, layout and drainage provision. A flow path will be maintained from the lowest point of the catchment on Old Connaught Avenue to the proposed primary regional attenuation pond.</p> <p>Recommendation No Change to Draft Plan</p>
iv. The Eastern and Midlands Regional Assembly (EMRA) recommends the draft LAP should make reference to RPO's 7.14 and 7.15 of the RSES regarding flood risk management and should refer to the guiding principles for Sustainable Drainage Systems as set out in Section 10.2 of the RSES.	<u>B0044</u>	<p>The Executive notes the issue raised.</p> <p>It is considered that the higher order dlr County Development Plan 2022-2028 and the Draft Plan already provide a robust policy framework for flood risk management and SuDS, and any further amendment is not recommended.</p> <p>Recommendation No Change to Draft Plan</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>v. The submission notes a flaw in the SFRA (Appendix 1), which states "the FRA has not identified any historic pluvial flood risk areas within the catchment". It notes that pluvial flooding has been a significant issue in the area and lists examples of such.</p>	<p><u>B0057</u></p>	<p>The Executive notes and acknowledges the issue raised.</p> <p>In this regard it is recommended that an amendment be made to Appendix 1B: Old Connaught Tributary Flood Risk Assessment, Section 4.7 'Pluvial Flooding', of the Draft Plan.</p> <p>Recommendation Amend Appendix 1B: Old Connaught Tributary Flood Risk Assessment, Section 4.7 'Pluvial Flooding' (page 18) as follows:</p> <p>"Pluvial flooding is the result of rainfall-generated overland flows which arise before run-off can enter any watercourse or sewer. It is usually associated with high intensity rainfall. This FRA has not identified any historic pluvial flood risk areas within the catchment. <u>Historic flood events within the catchment identified within the OPW's Past Flood Event Local Area Summary Report is limited to a single location adjacent to Festina Lente on Old Connaught Avenue. It is unclear from this record whether this is pluvial or fluvial in nature. Further supporting information has been provided documenting pluvial flow along Thornhill Road and Ballyman Road onto Old Connaught Avenue. The information identifies ten instances of pluvial flooding in the area between 1989 and 2013. It should be noted that all these instances of pluvial flooding occurred prior to the installation of the 900mm / 1200mm diameter storm sewer along Old Connaught Avenue in 2015 as part of the Old Connaught Scheme. However, Additionally, a local landowner indicated that the area marked in Figure 4-9 below is subject to flooding after high intensity rainfall. The landowner attributes this flooding to recent damage to subsurface drainage infrastructure preventing runoff entering the Old Connaught Tributary. All overland or pluvial flows are inherently included in this flood risk assessment. The flows calculated for use in the hydraulic modelling element of the study are based on runoff from the whole catchment area.</u>"</p>

Issues	Sub. No.	Executive's Response & Recommendation
<p>vi. Submission notes the SFRA specifies that flooding is not expected to occur in a 1% AEP, but would occur in a 0.1% AEP. The submission raises concerns that this prediction has not taken into consideration surface water run-off caused by rainfall, possibly resulting in pluvial pressure being put on the storm drains installed in 2014.</p> <p>vii. Submission highlights a watercourse in the central character area and queries if the SFRA took this into consideration.</p>	<u>B0057</u>	<p>The Executive notes the issue raised.</p> <p>It is considered that all overland or pluvial flows are inherently included in the flood risk assessment. The flows calculated for use in the hydraulic modelling element of the study for the SFRA are based on runoff from the whole catchment area.</p> <p>Recommendation No change to Draft Plan</p>

3.13 Appendix 4 – Acronyms and Glossary

Issues	Sub. No.	Executive's Response & Recommendation
i. Notes that the explanation of protected structure makes no reference to curtilage.	<u>B0058</u>	<p>The Executive notes the issue raised and sees benefit in including a reference to curtilage.</p> <p>This is consistent with Section 11.4.1 – 'Record of Protected Structures' in the dlr County Development Plan 2022-2028 and Section 9.4.1 – 'Protected Structures' of the Draft Plan.</p> <p>Recommendation Amend 'Protected Structure' as follows:</p> <p>"A structure, or a specified part of a structure, which is included in the record of protected structures (see Appendix 4 of the County Development Plan 2022-2028), which forms part of the architectural heritage of an area, and which are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest. A protected structure may include any specified feature which is within <u>the curtilage or the attendant grounds of the structure.</u>"</p>
ii. Notes that HEES and MRES are not included in acronyms.	<u>B0058</u>	<p>The Executive notes the issue raised but considers it not relevant.</p> <p>Recommendation No change to Draft Plan.</p>

3.14 Appendix 5 – Built Heritage

Issues	Sub. No.	Executive's Response & Recommendation
i. Requests the inclusion of the village pump site in the list of industrial heritage which is located in a recessed area with a platform approached by steps, located next to the letter box at the western end of Old Connaught Avenue.	<u>B0058</u>	<p>The Executive notes the issue raised and appreciate the information provided.</p> <p>The village pump is not listed in Appendix 4 'Heritage Lists' of the dlr County Development Plan 2022-2028. In that regard to include the item in the Draft Plan would render the Draft Plan inconsistent with the County Development Plan, which is not legislated for. This issue can be investigated further during the review of the County Development Plan.</p> <p>Recommendation No change to Draft Plan.</p>
ii. Notes that references to NBHS should read NIAH for the National Inventory of Architectural Heritage.	<u>B0058</u>	<p>The Executive notes issue raised and concurs with changing the wording. This is consistent with Policy Objective HER12: 'National Inventory of Architectural Heritage (NIAH)' of the dlr County Development Plan 2022-2028.</p> <p>Recommendation Amend the Introduction in Appendix 5 (page 1) as follows:</p> <p>"Where the structure has been surveyed by the National Built Heritage Service (NBHS) <u>National Inventory of Architectural Heritage (NIAH)</u>, their rating, description, Reg. number and category of special interest is set out together with a link to the survey entry for the structure".</p> <p>"Note 1: Not all structures that are on the RPS have been surveyed by the NBHS <u>NIAH</u>, in this instance, only details from the RPS within the County Development Plan is contained in the table."</p> <p>Note 3: The National Built Heritage Service <u>National Inventory of Architectural Heritage</u> surveys can be viewed by map, or by entering the NBHS <u>NIAH</u> Reg. No listed in Table 5.1 at: https://www.buildingsofireland.ie/buildings-search/</p>

Issues	Sub. No.	Executive's Response & Recommendation
		<p>Amend Table 5.1 (pages 1-9) as follows:</p> <p>"NBHS <u>NIAH</u> Reg. No"; "NBHS <u>NIAH</u> Categories of Special Interest"; "NBHS <u>NIAH</u> Description (where applicable)."</p>

3.15 Strategic Environmental Assessment

Issues	Sub. No.	Executive's Response & Recommendation
<p>i. The Environmental Protection Agency raise a number of points in relation to environmental assessment:</p> <ul style="list-style-type: none"> • Key environmental challenges for Ireland should be addressed as relevant and appropriate to the plan. • For local area plans, the relevant guidance document is the "SEA of Local Authority Land Use Plans – EPA Recommendations and Resources". • Outlines information which should be contained within an Environmental Report. • Screening any future amendments to the Plan for likely significant effects should be undertaken, using the same method of assessment applied in the "environmental assessment" of the Plan. • The plan must be in compliance with the objectives and policy commitments of relevant national and regional planning policy documents. • Guidance on SEA-related monitoring. • An SEA statement is to be prepared after the adoption of the plan including further consultation with listed statutory bodies. 	<p><u>B0002</u></p>	<p>The Executive notes and welcomes the issues raised.</p> <p>Recommendation No change to the Draft Plan.</p>

3.16 Other Issues

Issues	Sub. No.	Executive's Response & Recommendation
<p>i. Issue of noise pollution from the M11 and its effects on residents in its vicinity. Requests that soundproofing measures, such as acoustic barriers, be implemented along the M11 boundary to protect residents.</p> <p>ii. There are negative impacts on Cuilín from noise and air pollution from the M11, due in part to a lack of ability to mitigate these impacts and the lack of tall wall provided at the time of the construction of the M11.</p> <p>iii. There are high levels of noise pollution for residents at Allies River Road from the M11. Requests that sound barriers are constructed along the M11 to reduce noise pollution.</p> <p>iv. Air pollution levels associated with congestion on the M11 should be monitored at homes and Woodbrook College.</p> <p>v. Concerns about development creating noise, air pollution and vibration alongside traffic disruptions and the potential to lead towards damage and disturbance.</p> <p>vi. The submission notes that the draft plan contains minimal information on the effects of cumulative noise and vibrations from converging infrastructure on their property and adjacent properties.</p> <p>vii. Submission requests that the LAP incorporates appropriate noise mitigation policies for current and future residents in the LAP. Also to include LAP policies requiring applicants to carry out noise and vibration assessments for infrastructure development, and to require</p>	<p>B0004 B0015 B0020 B0021 B0037 B0080</p>	<p>The Executive notes the issue raised.</p> <p>The higher order dlr County Development Plan 2022-2028 contains Section 5.8 – 'Roads and Street Network' which sets out 5.8.5 Policy Objective T27: 'Traffic Noise' that indicates,</p> <p><i>'It is a Policy Objective to ensure that traffic noise levels are considered as part of new developments along major roads/rail lines in accordance with best practice guidelines.</i></p> <p><i>Along major transport corridors, the effect of traffic noise on the development must be considered and appropriate measures undertaken to mitigate the effect of noise. This should be considered in the context of the 'Dublin Agglomeration Environmental Noise Action Plan 2018-2023'. The Noise Action Plan is aimed at managing environmental noise and excludes, for the most part, noise from domestic activities, noise created by neighbours, noise at work places or construction noise. In the planning and design of national road schemes, cognisance must be given to the National Road Authority document 'Guidelines for the Treatment of Noise and Vibration in National Road Schemes' (2004) and to the subsequent supplementary document 'Good Practice Guidance for the Treatment of Noise during the Planning of National Road Schemes' (2014).'</i></p> <p>In addition, more detailed standards for noise, air and vibration impacts are included in Section 12.9 'Environmental Infrastructure' in Chapter 12 'Development Management' of the County Development Plan.</p> <p>These standards and policy objectives are also applicable to the Draft Plan and are considered to provide a robust policy framework for the assessment of planning applications in the Draft Plan area.</p>

Issues	Sub. No.	Executive's Response & Recommendation
appropriate mitigation as part of development proposals.		Recommendation No change to the Draft Plan.
viii. Concern about the impact of new development on the value of existing properties.	<u>B0013</u>	The Executive notes and acknowledges the issue raised. Recommendation No change to the Draft Plan.
ix. Ballyman Lane is the most beautiful winding rural lane in the County and deserves protection.	<u>B0016</u>	The Executive notes the issue raised. Ballyman Lane is outside the boundary of the Draft Plan. Recommendation No change to the Draft Plan.
x. Support for the plan to further develop the Old Connaught area.	<u>B0027</u>	The Executive notes the support to develop the Old Connaught area. Recommendation No change to the Draft Plan.
xi. A statement of common ground should be set out which incorporates the main requirements of Bray Emmets, developers, TII, NTA and other users to allow stakeholders to work together to support progress of a more suitable LAP and deliver crucial housing needs.	<u>B0035</u>	The Executive notes the issue raised. Stakeholder engagement was undertaken during the pre-draft consultation phase of the Draft Plan and also during the preparation of the Draft Plan. Consultation with relevant stakeholders will be undertaken during the more detailed design stages of the planning application process. Recommendation No change to the Draft Plan.
xii. Construction related matters including: • Mitigation measures during construction periods, noise level monitoring and compensation/repairs for homes affected by construction. • Accountability for contractors, who to contact during disruptions and what to do when working hours are breached.	<u>B0037</u> <u>B0045</u> <u>B0049</u> <u>B0063</u> <u>B0066</u> <u>B0079</u>	The Executive notes the issue raised. It is highlighted in Section 12.9.4 'Construction Management Plans' in the dlr County Development Plan 2022-2028, that construction related matters will be addressed through Construction Management Plans (CMP) which contain measures to mitigate against the effects of the construction including traffic management, hours of working, delivery times, prevention of noise and dust, reinstatement of roadway lining

Issues	Sub. No.	Executive's Response & Recommendation
<p>Requests that a liaison or communication channel be provided.</p> <p>xiii. A number of concerns are raised in relation to construction activity:</p> <ul style="list-style-type: none"> • Requests clarity on who will be carrying out construction work in the area. • Requests a parking agreement be put in place during construction work which would ensure Allies River Road is not used for on-street parking of construction vehicles. • Requests information on monitoring systems of construction in relation to dust, noise, and vibrations. • Requests information on working hours during construction and accountability for any breaches. • Asks whether personnel or dlr liaison will be assigned to manage resident queries and complaints. <p>xiv. During construction of Phase A and B existing residents will experience road closures, traffic congestion, and associated noise and dirt common with large construction sites. Concerns about builder's car parks and derelict boarded up houses.</p> <p>xv. Construction phase related issues including:</p> <ul style="list-style-type: none"> • Access and use of the surrounding area for recreational purposes during construction phases. • Plans for construction traffic during initial phases having regard to existing congestion on Old Connaught Avenue. <p>xvi. Concerns in relation to construction activity:</p>		<p>and signing, repair of damage to footways and grass verges and the accommodation of worker parking within the development curtilage.</p> <p>In addition, more detailed standards for noise, air and vibration impacts are included in Section 12.9 'Environmental Infrastructure' in Chapter 12 'Development Management' of the County Development Plan.</p> <p>These standards and policy objectives are also applicable to the Draft Plan and are considered to provide a robust policy framework for the assessment of planning applications in the Draft Plan area in relation to construction management.</p> <p>Recommendation No change to the Draft Plan.</p>

Issues	Sub. No.	Executive's Response & Recommendation
<ul style="list-style-type: none"> Building vehicle access should be put in place first. Construction traffic speed and dust. 		
<p>xvii. The submission observes that that the Old Connaught Area Based Transport Assessment (OCABTA) which has informed the preparation of the Draft LAP should be published as a separate document and included as part of the appendices of the LAP.</p>	<u>B0044</u>	<p>The Executive notes the issue raised and appreciates the request.</p> <p>The ICAS which informed the preparation of the Draft Plan provides a comprehensive area based transport assessment (ABTA) for the Old Connaught area. The ABTA is interwoven into the ICAS and its recommendations were carried forward for assessment and consideration of the transport strategy for the Draft Plan.</p> <p>Section 6.4 – 'Area Based Transport Assessment for Old Connaught' of the Draft Plan provides a comprehensive explanation of the ABTA methodology and the iterative development of proposed transport policies and transport strategy for the area.</p> <p>The ICAS including the ABTA are published in full as supporting documents to the Draft Plan and in this regard, it is not considered necessary to provide a separate ABTA document.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>xviii. Omission of LAP expiry date in draft plan, in conflict with S18(4)(a) of the Planning and Development Act 2000.</p>	<u>B0050</u>	<p>The Executive notes issue raised.</p> <p>Section 1.2 of the Draft Plan indicates that from the date of its adoption by the Council, the Draft Plan will be valid for a period of six years, unless otherwise amended, or extended by the Planning Authority.</p> <p>Recommendation No change to the Draft Plan.</p>
<p>xix. Suggests the final draft LAP include a section setting out the legal status of the plan</p>	<u>B0050</u>	<p>The Executive notes issue raised.</p>

Issues	Sub. No.	Executive's Response & Recommendation
following the commencement of Part 3 of the new Planning and Development Act 2024.		<p>This can be considered when sufficient legal clarity is available from the Department of Housing, Local Government and Heritage in relation to the request.</p> <p>Recommendation No change to the Draft Plan.</p>
xx. Requests the removal of the letters "no." through draft LAP as it disrupts the flow of a sentence.	B0058	<p>The Executive notes issue raised and concurs with clarifying the readability of the Draft Plan.</p> <p>Recommendation Amend Section 1.3.1 (page 4) as follows:</p> <p>"A total of 38 no. written submissions/observations were received during the display period."</p> <p>Amend Section 5.3.2 (page 49) as follows:</p> <p>"Ferndale Court, located at former seminary buildings off the Allies River Road, comprises c. 50 no. residential units in a mix of housing typologies while Old Connaught House, a Protected Structure located off the Ferndale Road, comprises c. 43 no. apartments."</p> <p>Amend Section 5.3.4.7 (page 52) as follows:</p> <p>"At the time of writing, a Section 179A Scheme is being progressed to provide for 6 no. houses at the lands."</p> <p>Amend Section 11.3.1 (page 117) as follows:</p> <p>"Based on an assessment of infrastructure requirements, Phase A incorporates an initial sub-phase ('sub-phase 1') where limited residential development may be facilitated (c. 450 no. units), supported by existing infrastructure capacity, interim measures including wastewater infrastructure and additional enabling infrastructure proportionate to the scale of development, see Table 11.1."</p>

Issues	Sub. No.	Executive's Response & Recommendation
xxi. Requests to maintain a single form of notation regarding square metres.	<u>B0058</u>	<p>The Executive notes issue raised and consider that it does not impact the legibility or understanding of the Draft Plan.</p> <p>Recommendation No change to Draft Plan.</p>
xxii. Enquires about the use of "minimum" instead of "maximum".	<u>B0058</u>	<p>The Executive notes issue raised.</p> <p>Policy and Objective 5.1 of the Section 28 Guidelines 'Sustainable and Compact Settlements' (2024) state that the requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area save in exceptional circumstances.</p> <p>Recommendation No change to the Draft Plan.</p>
xxiii. There is a need for collaboration between LAPs for Bray, Rathmichael and Kilternan due to potential impact.	<u>B0063</u> <u>B0066</u>	<p>The Executive notes the issue raised and does not concur.</p> <p>There has been collaboration with Wicklow County Council during the preparation of the Draft Plan as indicated in Section 1.4.1.1 'Infrastructure Capacity Assessment Study' of the Draft Plan. In addition, Section 2.2.2.1 'Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019-2031' in the Draft Plan indicates that Old Connaught is identified as an environ of the Key Town of Bray and that RSES Policy Objective's 4.37 and 4.38 emphasise the collaboration between Wicklow County Council and dlr County Council for the extension of Bray.</p> <p>Section 1.4.1.1 also indicates that the ICAS was undertaken jointly to inform the Old Connaught LAP and will inform the Rathmichael area plan. Section 6.4 'Area Based Transport Assessment for Old Connaught' of the Draft Plan also emphasises the collaboration between Old Connaught and Rathmichael.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		Recommendation No change to Draft Plan.
xxiv. Submission requests details of the expected sequencing of infrastructure construction projects relative to each other, and high-level construction and construction traffic management proposals.	B0080	<p>The Executive notes the issue raised.</p> <p>The higher order dlr County Development Plan 2022-2028 contains Section 12.9.4 'Construction Management Plans' which indicates that construction and associated issues will be managed through the planning application process.</p> <p>Sections 11.3.1-11.3.3 ('Old Connaught - Phase A, Old Connaught Phase – B and Old Connaught – Phase C') contain infrastructure phasing tables that outline details of the infrastructure framework and proposals relative to each other.</p> <p>Recommendation No change to Draft Plan.</p>
xxv. No reference to social cohesion, crime and anti-social behaviour in the draft plan, nor any mention of engagement with An Garda Siochana Community Engagement or Crime Prevention Officers. Requests information on how design principles will inhibit such in draft plan.	B0080	<p>The Executive notes the issue raised.</p> <p>The higher order dlr County Development Plan 2022-2028 contains Section 4.4.1. 'Quality Design and Placemaking which contains a Policy Objective that indicates,</p> <p><i>'It is a Policy Objective to facilitate the promotion and delivery of a safe environment for both the residents of, and visitors to, the County.'</i></p> <p>Section 12.3.1 'Quality Design' sets out criteria that will be taken into account when assessing applications like safety. The Draft Plan takes into consideration social cohesion within Section 5.2.1.2 'Community Facilities' indicates that cultural, civic and community infrastructure is integral to the promotion of social cohesion and contains Policy OCLAP9 – 'New Community Facilities' which supports the reference to the importance of social cohesion within the Draft Plan.</p>

Issues	Sub. No.	Executive's Response & Recommendation
		Recommendation No change to the Draft Plan.

Part 4: Appendices to Chief Executive's Report

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

Chapter / Section	Pg. No.	Errata
Preamble/Executive Summary		
	iv	Include 'The Vision for Old Connaught' graphic on new page v of the Preamble/Executive summary
Chapter 7		
7.4.3	79	Policy OCLAP37 – Views and Prospects: Replace ' It is an Objective that development within the Draft Plan area has regard to the Old Connaught Historic Landscape Character Assessment (2007) ' with ' <u>It is Policy to ensure the preservation of the views and prospects at Old Connaught, as designated in the dlr County Development Plan 2022-2028.</u> '
7.5.5	82	Notes 'pine martin' is spelt incorrectly. Amend to 'pine marten'.
Chapter 10		
10.5.2	109	Amend last line of first paragraph: ' The SFRA is contained in Appendix A 1. '
10.6.3	112	Policy OCLAP63 – Renewable Energy Use: Remove '.' from ' including photo voltaic (PV) in appropriate locations- '
Appendix 1		
	10	Notes that St Brendan's School is now known as Woodbrook College.
Appendix 5		
	6	Notes 'Valombrosa' is spelt incorrectly, should be 'Vallombrosa'

Appendix 2 – 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—

(i) 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),

(ii) 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.

(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, 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.

Appendix 3 – Acronyms

AA:	Appropriate Assessment	FOI:	Freedom of Information
ABP:	An Bord Pleanála	FRA:	Flood Risk Assessment
ABTA:	Area Based Transport Assessment	FRMP:	Flood Risk Management Plan
ACA:	Architectural Conservation Area	FRS:	Flood Relief Scheme
BH:	Building Height	GDA:	Greater Dublin Area
BS:	British Standard	GHG:	Greenhouse Gas
BTR:	Build-to-rent	GI:	Green Infrastructure
CAP:	Climate Action Plan	GPS:	Global Positioning System
CBA:	Cost Benefit Analysis	GSI:	Geological Survey of Ireland
CBC:	Core Bus Corridor	GW:	Gigawatt
CDP:	County Development Plan	HSE:	Health Service Executive
CE:	Chief Executive	IGB:	Irish Glass Bottle
CFRAM:	Catchment Flood Risk Assessment and Management	KDA:	Key Development Area
CMH:	Central Mental Hospital	LAP:	Local Area Plan
CMP:	Construction Management Plan	LDA:	Land Development Agency
CSO:	Central Statistics Office	LEV:	Low Emission Vehicle
DC:	District Centre	MA:	Material Amendment
DCC:	Dublin City Council	MASP:	Metropolitan Area Strategic Plan
DEBP:	Dublin Eastern Bypass	MFF:	Motion from the Floor
DLR:	Dún Laoghaire-Rathdown County Council	NC:	Neighbourhood Centre
DMURS:	Design Manual for Urban Roads and Streets	NDP:	National Development Plan
DoE:	Department of Education	(p)NHA:	(proposed) Natural Heritage Area
DoHLGH:	Department of Housing, Local Government and Heritage	NIFM:	National Indicative Fluvial Mapping
ECCE:	Early Childhood Care Education	NPF:	National Planning Framework
ECFRAM:	Eastern Catchment Flood Risk Assessment and Management Plan	NPO:	National Policy Objective
EHO:	Environmental Health Officer	NPPF:	National Planning Policy Framework (England)
EMRA:	Eastern and Midlands Regional Assembly	NBS:	Nature Based Solutions
EPA:	Environmental Protection Agency	NSO:	National Strategic Outcome
ER:	Environmental Report	NTA:	National Transport Authority
ESB:	Electricity Supply Board	NZEB:	Nearly Zero Energy Building
EU:	European Union	OMC:	Owners Management Company
EV:	Electric Vehicle	OPR:	Office of the Planning Regulator
		OPW:	Office of Public Works
		PA:	Planning Authority
		PDA:	Planning and Development Act

PFRA:	Preliminary Flood Risk Assessment
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
SFRA:	Strategic Flood Risk Assessment
SHD:	Strategic Housing Development
SI:	Statutory Instrument

SLO:	Specific Local Objective
SNI:	Sustainable Neighbourhood Infrastructure
SPA:	Special Protection Area
SPPR:	Specific Planning Policy Requirement
SSFRA:	Site Specific Flood Risk Assessment
SuDS:	Sustainable Drainage Systems
SWOC:	Strengths, Weaknesses, Opportunities and Constraints
TII:	Transport Infrastructure Ireland
UE	Uisce Eireann
UFP	Urban Framework Plan
UK:	United Kingdom
UN:	United Nations
URDF:	Urban Regeneration and Development Fund
UV:	Ultraviolet
WHO:	World Health Organisation

