

**A REVIEW OF DÚN LAOGHAIRE-RATHDOWN COUNTY
DEVELOPMENT PLAN 2010- 2016 AND PREPARATION OF
A NEW COUNTY DEVELOPMENT PLAN 2016-2022**

PRE - DRAFT CONSULTATION PROCESS

**REPORT TO COUNCIL UNDER SECTION 11 (4) OF THE PLANNING
AND DEVELOPMENT ACT 2000, AS AMENDED.**

9th July 2014

PART 1
INTRODUCTION

TABLE OF CONTENTS

Part 1: Introduction		Page No
1.1	Purpose & Contents of Report	5
1.2	Legislative Background for the Chief Executive's Report	6
1.3	Pre-Draft Consultation Process	7
1.4	Overview of Issues & Topics Raised	8
1.5	Approach to Consideration of Written Submissions	9
1.6	Information Vacuum	9
1.7	Where to Next?	10
Part 2: Summary of Main Issues Raised by Dublin Regional Authority & National Transport Authority and Chief Executive's Opinion & Recommendations		
2.1	Dublin Regional Authority	12
2.2	National Transport Authority	17
Part 3: Summary of Main Issues & Chief Executive's Opinion & Recommendations		
1:	Sustainable Communities Strategy	25
1.1	Population and Housing	26
1.2	Sustainable Transportation and Travel	35
2:	Enterprise and Employment Strategy	63
2.1	Enterprise and Employment	65
2.2	Retailing	69
2.3	Major Town Centres	74
3:	Green Infrastructure Strategy	77
3.1	Landscape, Biodiversity & Natural Heritage	79
3.2	Open Space, Recreation & Sports Development	88
4:	Physical Infrastructure Strategy	95
4.1	Environmental Infrastructure & Management	97
4.2	Climate Change Adaptation & Energy Efficiency	104
4.3	Flood Risk	106
5:	Built Heritage Strategy	111
5.1	Archaeological Heritage	113

Part 1: Introduction

5.2	Architectural Heritage	115
6:	Community Strategy	121
6.1	Social & Community Development	123
6.2	Cultural & Arts Development	133
7:	Principles of Development	135
7.1	Urban Design, Building Height & Place Making	137
8:	Non-Specific / Generic Zoning Objectives	139
8.1	Rathmichael Area/Greenbelt/Density	141
8.2	Land Use Zoning Objectives	142
8.3	Miscellaneous	145
9:	Development Management Issues	147
9.1	General	149
9.2	Land Use Zoning Objectives	150
9.3	Education	151
9.4	Childcare Facilities	151
10:	Strategic Environmental Assessment & Appropriate Assessment	153
10.1	Strategic Environmental Assessment	155
10.2	Appropriate Assessment	155
11:	Miscellaneous	157
11.1	Dún Laoghaire Harbour	159
11.2	Rights-of-Way	164
11.3	Part V and Development Levies / Contributions	167
11.4	Cherrywood SDZ Planning Scheme	168
11.5	Sandyford Urban Framework Plan	169
11.6	Other	171
Appendices A-E		175
A	Persons/Bodies Directly Informed	177
B	Submissions Received	181
C	Principal National, Regional And Local Policy Documents, Guidelines And Plans That Will Help Inform And Guide The Preparation Of The New Development Plan	199
D	Mandatory Requirements for Development Plan	205
E	Development Plan Timetable	209

Acronyms:

AA:	Appropriate Assessment	SPA:	Special Protection Area
ACA:	Architectural Conservation Area	S2S:	Sutton to Sandycove cycleway
(c)ACA:	(candidate) Architectural Conservation Area	SUDS:	Sustainable Urban Drainage Solutions
CDP:	County Development Plan 2010-2016	SUFP:	Sandyford Urban Framework Plan
CFRAM:	Catchment Flood Risk Assessment and Management	VDS:	Village Design Statements
CSO:	Central Statistics Office	UCD:	University College Dublin
DAHG:	Department of Arts, Heritage and the Gaeltacht	UPH:	Units per hectare
DART:	Dublin Area Rapid Transit		
DCC:	Dublin City Council		
DECLG:	Department of the Environment, Community and Local Government		
DES:	Department of Education and Skills		
DLR:	Dún Laoghaire-Rathdown County Council		
EIA:	Environmental Impact Assessment		
EIS:	Environmental Impact Statement		
EPA:	Environmental Protection Agency		
EU:	European Union		
GDA:	Greater Dublin Area		
GDSDS:	Greater Dublin Strategic Drainage Study		
HLA:	Housing Land Availability		
IADT:	Institute of Art, Design and Technology		
ICW:	Integrated Constructed Wetlands		
LAP:	Local Area Plan		
(p)NHA:	(proposed) Natural Heritage Area		
NPWS:	National Parks and Wildlife Service		
NSS:	National Spatial Strategy 2002 - 2020		
NTA:	National Transport Authority		
PS:	Protected Structure		
QBC:	Quality Bus Corridor		
RMP:	Record of Monuments and Places		
ROW:	Right of Way		
RPG:	Regional Planning Guidelines for the Greater Dublin Area 2010 - 2022		
RPS:	Record of Protected Structures		
SAC:	Special Area of Conservation		
SDCS:	Supplementary Development Contribution Scheme		
SDZ:	Strategic Development Zone		
SEA:	Strategic Environmental Assessment		
SFRA:	Strategic Flood Risk Assessment		
SLO:	Specific Local Objective		

1. Introduction

1.1 Purpose and Contents of Report

The purpose of this document is to report on the outcome of the consultation process carried out prior to the imminent preparation of the new Draft County Development Plan for Dún Laoghaire–Rathdown.

The report forms part of the statutory procedure towards the making of a new County Development Plan in Spring 2016. The report is not intended to be exhaustive and gives details on all the topics and matters that will be addressed in the forthcoming Plan but, rather, will make recommendations on the issues to be included and the overall approach to be adopted, on foot of the recent public consultation exercise.

The Minister for the Environment, Heritage and Local Government issued Guidelines to Planning Authorities on the preparation of Development Plans in June 2007. The Guidelines state that high quality Development Plans lie at the heart of a high quality planning system. The Guidelines set out a framework within which Development Plans will achieve high standards in relation to:

- How they set out their aims and objectives
- How they are produced
- How they are presented
- How they are implemented and monitored

The Guidelines promote a number of key messages including:

- Development Plans should be strategic
- Development Plans should be a catalyst for positive change and progress
- Development Plans should anticipate future needs on an objective basis
- They have a key role in protecting the environment and heritage
- That there is clear consistency between plans and strategies at different levels
- There should be broad community ownership of the Development Plan
- Diverse community needs should be addressed
- Codes of Conduct must be observed in the making of Development Plans.

In the process of preparing a Draft Development Plan it is strongly recommended that Local Authorities have regard to the 2007 Government Guidelines.

In addition Local Authorities should also have regard to Circular Letter PPL 1/2010 issued by the Minister in relation to the implementation of the Planning and Development Act 2010, and in particular core strategies. Guidance notes on core strategies were published in November 2010.

PART 1 of this report consists of an introduction, followed by an explanation of the legislative background and requirements for the Chief Executive's Report under the Planning and Development Act, 2000 (as amended) and a description of the consultation process. The process which resulted in 119 formal written submissions in addition to a wide variety of views, comments and ideas recorded at various stakeholder meetings held both prior to, and during, the 8 week consultation period which ran from 19th March to 14th May 2014. **PART 1** concludes with a description of the next steps in the process towards the making of the new County Development Plan.

PART 2 consists of an analysis and summary of the issues raised in the written submissions received by the Council from the Dublin Regional Authority and the National Transport Authority. This 'separation' of the submissions by these two prescribed bodies is simply to accord with the legislative requirements.

Part 1: Introduction

PART 3 consists of an analysis and summary of the issues raised in the written submissions received by the Council. The issues are analysed and summarised under the 'umbrella' headings which are listed in Part 3 of the table of contents above.

The Chief Executive's Opinions on the issues raised are then given. **PART 2 and PART 3** also contain any recommendation by the Chief Executive on any policies to be contained in the Draft County Plan.

Members of the Council were provided with a hyperlink to the Planning Zylab system that allows Members to view each submission from their laptop and/or PC. The Zylab link contains all the written submissions / observations (including any maps) received during the Pre-Draft public consultation stage. This hyperlink is also provided on the Council's Planning Website so enabling members of the general public to access the same data electronically. Hard copies of the submissions/observations can also be accessed at the public counter of the Planning and Enterprise Department in County Hall.

Five appendices to the Main Report are included as follows:

Appendix A consists of a list of persons /bodies who were directly informed of the Pre-Draft 'Have Your Say, Issues and Options' phase of the overall Development Plan process including the prescribed bodies, post primary school principals, 100 top businesses in the County and circa 600 community groups.

Appendix B lists those persons /bodies that made written submissions.

Appendix C lists the principal National, Regional and Local policy documents and guidelines that will help inform and guide the preparation of the new Development Plan.

Appendix D sets out the matters that must be included in a Development Plan, as well as those matters that may be included.

Appendix E sets out the statutory time frame henceforth for the preparation of the new County Development Plan to be made in Spring 2016.

This report is submitted to the Elected Members for their consideration.

1.2 Legislative Background for the Chief Executive's Report

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

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

- **List** the persons or bodies who made submissions or observations, as well as any persons or bodies consulted.
- **Summarise** the issues raised in the submissions and during the consultations, where appropriate, but shall not refer to a submission relating to a request or proposal for zoning of particular land for any purpose.
- Give the **Opinion** of the Chief Executive on the issues raised. In this regard the Chief Executive's opinion must take into account (a) the proper planning and sustainable development of the area, (b) the statutory obligations of any Local Authority in the area, and (c) any relevant policies or objectives of the Government or any Minister of the Government.
- Finally, the Report shall state the Chief Executive's **Recommendations** on the Policies to be included in the Draft Development Plan.

The Chief Executive's Report must then be submitted to the Members of the Planning Authority or a committee of the Planning Authority for their consideration.

Members may then issue **Directions** to the Chief Executive regarding the preparation of the Draft Development Plan (Section 11(4)(d)). These Directions shall be strategic in nature and shall take account of the statutory obligations of any Local Authority in the area and any relevant policies or objectives of the Government or of any Minister of the Government. In issuing Directions, Section 11(4)(f) of the Act states that the Members shall be restricted to considering the proper planning and sustainable development of the area to which the Development Plan relates. Directions must be issued not later than 10 weeks after the submission of the Chief Executive's Report, which in this case is by the 17th September 2014.

1.3 Pre-Draft Consultation Process

1.3.1 Background

The Planning and Development Act, 2000, as amended, revised all previous planning legislation and introduced some far-reaching changes in the Development Plan process. These changes include the provisions whereby members of the public, service providers and other organisations and bodies can now make submissions prior to the preparation of Draft Development Plans. This allows public involvement at a much earlier stage in the plan preparation process and is intended to enable everyone to have a sense of ownership of Development Plans. The Act also makes provision for the preparation of this Chief Executive's Report.

1.3.2 Description of Notification Procedures/Consultation Process

The Pre-Draft ('Have Your Say') consultation stage ran from 19th March until 14th May 2014. To stimulate general debate and public interest in the process, and to ensure adequate information was available to interested parties, groups and organisations, a free 'Have Your Say' document was published and made available through the Planning and Enterprise Department, public libraries and the Council's website. This formed the primary focus and basis for the public consultation process.

The process itself comprised a series of elements including:

- (i) Two non-statutory Briefing Sessions for all Councillors on the 25th and 27th February 2014.
- (ii) Publication of newspaper advertisements inviting written submissions. Adverts appeared in both national press and local newspapers.
- (iii) Targeted 'press release' for local Variable Frequency Drive press and radio.
- (iv) Distribution of 'Have Your Say' booklet to more than 800 individual residents associations, community groups, business interests and other stakeholder organisations.
- (v) Six Public Open Days in each Electoral Area - attended by Council Planning Officials – to disseminate information, clarify queries and note any comments or observations made.
- (vi) Details of the Plan Review and 'Have Your Say' booklet placed on the Council's website.

1.3.3 Written Submissions

Some 119 written submissions (hard copy and e-mail) were received on or before 14th May 2014. All written submissions received on or before the due date are considered in this report. Late submissions will be retained on file for reference. There will be a further opportunity to make written submissions when the Draft Plan goes on public display in March 2015.

1.3.4 Website

There were 1199 hits on this section of the Council's website between the 19th March and 14th May 2014.

1.3.5 Briefing Sessions

Two non-statutory Briefing Sessions for all Councillors were held on the 25th and 27th February 2014. In addition, for those Councillors who could not attend the sessions held in February, three additional dates were made available, 4th March 2014, 10th March 2014 and the 25th March 2014.

1.3.6 Open Days

Six public open days were organised at which Planning Officials were present to disseminate relevant information, clarify queries from the general public and other organisations and to note any comments and observations made by attendees. These were held in each electoral area as follows,

- Blackrock, Tuesday 1st April, 2014, 2.00pm – 8.00pm
- Dún Laoghaire, Thursday 3rd April, 2014, 10.00am – 1.00pm & 5.00pm – 8.00pm
- Dundrum, Tuesday 8th April, 2014, 10.00am – 1.00pm & 5.00pm – 8.00pm
- Loughlinstown, Thursday 10th April, 2014, 10.00am – 1.00pm & 5.00pm – 8.00pm
- Stillorgan, Tuesday 29th April, 2014, 2.00pm – 8.00pm
- Sandyford, Thursday 1st May, 2014, 2.00pm – 8.00pm

1.3.7 Public Access To Submissions

All written submissions (including maps) have been scanned onto the Planning Department's Zylab system. A hyperlink to this system is provided on the Council's website under '*Review of the County Development Plan (2010-2016) and preparation of a new County Development Plan (2016-2022)*' that enables members of the general public, and others, to view each submission electronically via their laptop or PC. The original hard copies of the written submissions can also be examined at the Planning and Enterprise Department public counter.

1.4 Overview of Issues and Topics Raised

Many of the submissions refer to multiple topics, while others refer only to single, specific issues. While some submission may only relate to one topic they make multiple points under the same topic. Appendix B provides a list of all persons/ bodies that made written submissions. A breakdown of the broad headings under which issues were raised in the submissions received is set out in the table below.

Topic of Interest	Number of Mentions	Percentage
Sustainable Transportation and Travel	55	17%
Open Space, Recreation Sport	31	10%
Social and Community Development	29	9%
Population and Housing	27	8%
Non-Specific / Generic Zoning Objectives	27	8%
Environmental Infrastructure and Management	18	6%
Development Management Issues	14	4%
Enterprise and Employment	13	4%
Architectural Heritage	12	4%
Natural Heritage	11	3%
Retailing	10	3%
Landscape and Biodiversity	9	3%
Flood Risk	9	3%
SEA and Appropriate Assessment	9	3%

Part 1: Introduction

Urban Design, Building Height and Place Making	8	3%
Dún Laoghaire Harbour	7	2%
Climate Change Adaptation and Energy Efficiency	6	2%
Rights of Way	5	2%
Other	5	2%
Major Town Centres	3	1%
Archaeological Heritage	3	1%
Cultural and Arts Development	3	1%
Sandyford UFP	3	1%
Part V and Development Levies / Contributions	2	1%
Cherrywood SDZ Planning Scheme	1	0%

Issues relating to sustainable transport and travel received the highest number of mentions in submissions made followed by open space recreation and sport. Despite the fact that the Act now precludes any submission relating to the zoning of land at this pre draft consultation stage a number of submissions still related to specific or non specific zoning of land for different uses.

1.5 Approach to Consideration of Written Submissions

An analysis of the submissions and the results of the public consultation meetings have been carried out and the topics and issues raised have been extracted and categorised. This is dealt with in greater detail in Parts 2 and 3 of this report. It is possible to identify overall themes reflecting the concerns of the public emerging in this process. This report analyses these themes and, having regard to National, Regional and Local policies and guidelines, suggests how policies that would respond to these concerns might be incorporated into the new Draft Plan.

Section 11(4)(b)(ii) of the Planning and Development Act 2000, states that this report shall not refer to a submission relating to a request or proposal for zoning of particular land for any purpose.

1.6 Information Vacuum

The new Draft County Development Plan is being prepared at a time when there are a number of major information/guidance vacuums at National and Regional level which will undoubtedly impact on the structure and content of the Plan. The most fundamental 'gaps' – that will almost certainly not be addressed prior to the Draft Plan going out to public consultation in March 2015 – are as follows:

- The current National Spatial Strategy 2002-2022 – which was prepared through 2000/2001 – is now acknowledged as being well out-of-date and the thrust of the Strategy now has little currency or relevance to the current economic and spatial dynamics of the State. The Department of Environment, Community and Local Government has flagged that a replacement document is pending, but work has yet to commence on same and the indications are that it is unlikely to be completed before late 2015 / early 2016 at best.
- Likewise, the currency of the 2010-2022 Greater Dublin Area Regional Planning Guidelines (RPGs) – which were crafted using 2006 Census data – is also questionable and becoming more so as time passes. In the normal course of events preparation on the required six year review of the RPGs would already have commenced. This, however, has been delayed firstly as a consequence of the need to have a new National Framework in place to guide the Regional Strategy and, secondly the replacement of the former Regional Authorities by new Regional Assemblies as from 1st June 2014. Indications are that the new Regional Spatial and

Part 1: Introduction

Economic Strategies (RSES) which will replace the RPGs are unlikely to be completed before end 2016. In the interim the primary legislation requires County Development Plans 'to be consistent with' any RPGs in force at the time until the RPGs are replaced.

- A new mandatory component of Development Plans post-2010 is the requirement to prepare a Flood Risk Assessment for the County. The OPW are currently preparing – on a prioritised basis – Flood Risk Assessment Mapping (CFRAM) for the entire County which is intended to very much inform and guide Development Plan Flood Risk Assessments. Unfortunately, latest indications suggest the CFRAM mapping for Dún Laoghaire-Rathdown is unlikely to be available before early 2015. Preparing a mandatory Strategic Flood Risk Assessment in the absence of the relevant CFRAM mapping will prove difficult.

These, and other National/Regional level information gaps – an updated GDA Retail Strategy for example – will prove challenging in the preparation of a Draft Plan that has validity and addresses the current dynamics and metrics of the County. As these National and Regional 'gaps' are addressed over time – and revised data sets, objectives and targets emerge – Dún Laoghaire-Rathdown will almost certainly be required to advance Variations to the new County Development Plan post its adoption.

1.7 Where to Next?

Members will require to complete the consideration of this Chief Executive's Report by 17th September 2014. As intimated previously, Members may issue **Directions** to the Chief Executive with a view to influencing the preparation of the Draft Plan.

The timetable for the preparation of the 2016 County Development Plan is outlined in Appendix E. The period from 17th September to 10th December 2014 is available for the preparation of the Draft Plan.

Information, data and other elements that will feed into the preparation of the Draft Plan will include:

- Any Directions made by Elected Members.
- The outcome of the public consultation exercise into the 'Have Your Say' booklet.
- Background studies and analysis which are currently ongoing including:
 - Housing Land Availability assessment
 - Revision of the Housing Strategy
 - Strategic Environmental Assessment
 - Appropriate Assessment
- A whole raft of National, Regional and Local plan, policies and guidelines which are listed in Appendix C.

The Elected Members will then have an 8 week period from 10th December 2014 to 16th February 2015, within which to consider the proposed Draft Plan. The Finalised Draft Plan will be published at the beginning of March 2015 for public comment and inputs.

PART 2

SUMMARY OF MAIN ISSUES RAISED BY DUBLIN REGIONAL AUTHORITY & NATIONAL TRANSPORT AUTHORITY AND CHIEF EXECUTIVE'S OPINION & RECOMMENDATIONS

Key Issue Issues raised by Dublin Regional Authority and National Transport Authority	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
2.1. Dublin Regional Authority			
2.1.1 General			
i) Submission provides a detailed background to the purpose of the Regional Planning Guidelines. Details of the new proposed Regional Assembly Structure and outline the purpose of the proposed new Regional and Economic Strategies.	A007		The contents of this submission have been noted.
ii) The objective of the new Regional Spatial and Economic Strategies will be to support the implementation of the National Spatial Strategy and the economic policies and objectives of the government by providing a long-term strategic planning and economic framework for the development of the Region.	A007		The contents of this submission have been noted.
iii) Status of the current RPGs 2010 – 2022 is enshrined in the Local Government Reform Act 2014.	A007		The contents of this submission have been noted.
iv) Submission acknowledges that the time frame for the commencement of the Regional Spatial Economic Strategies (RSES) may not coincide with the Development Plan Review process for Dún Laoghaire-Rathdown.	A007		The acknowledgment of this mis-match of time frame between the pending review of the NSS, the subsequent preparation of RSES and the Dún Laoghaire-Rathdown County Development Plan in process is welcomed. The information vacuum in relation to up-to-date National and Regional planning guidance and frameworks is creating difficulties for the current County Development Plan process and may possibly result in a number of Variations soon after the

Key Issue Issues raised by Dublin Regional Authority and National Transport Authority	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
			adoption of the next Plan.
2.1.2 Sustainable Communities Strategy			
i) Submission recommends that the growth and settlement strategy for DLR support the key elements of the RPGs including population and housing targets.	A007		The contents of this submission have been noted.
ii) Submission states that the challenge of the new County Development Plan will be to meet the current demand for housing supply. An evidence-based Core Strategy should address this challenge.	A007		It is agreed that an up-to-date evidence based Core Strategy will address the challenges facing the County. It is important that medium-to-longer-term sustainable planning remains objective and evidence based and not influenced by short-term, market-led fluctuations and trends.
2.1.3 Sustainable Transport			
i) Policies aimed at promoting higher employment and residential densities around public transport corridors and nodes should continue to inform the County Development Plan.	A007		It is recognised that there is a need to continue to promote higher densities for employment and residential uses around public transport provision. Current media and developer-driven demands for lower density own-door units close to public transport nodes and corridors is not a tenable proposition in terms of the promotion of sustainable planning. The Draft Plan will continue to promote higher densities at suitable locations. The support of the Dublin Regional Authority in regard to such policies is welcomed.

Key Issue Issues raised by Dublin Regional Authority and National Transport Authority	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
2.1.4 Enterprise and Employment			
i) Submission recognises that employment land is limited in Dún Laoghaire-Rathdown although it is noted that significant employment occurs in areas not specifically zoned for employment. Core Strategy should address the location of current employment; assess employment trends, typology and demands across the County in order to determine optimum land use requirements.	A007		The Core Strategy of the Draft Plan will include a detailed analysis of the existing employment/enterprise landbank and future requirements having regard to population growth forecasts and other considerations such as job ratio, labour force participation rates and likely 'employment density' in new development areas.
2.1.5 Retailing and Major Town Centres			
i) Submission requests that retail policies and retail development within the County should support the policies and recommendations of the Retail Strategy for the Greater Dublin Area (GDA) contained in the Regional Planning Guidelines. The Retail Strategy for the County is aligned with the hierarchy for the GDA, with the exception of Carrickmines, which is not a District Centre in the GDA Strategy. Submission also recommends that other retail nodes in the County but not yet included in the RPG retail hierarchy should also be addressed.	A007	9	Examine the possible reclassification within the retail hierarchy of Carrickmines and other relevant retail nodes during the preparation of the Draft Plan.

Key Issue Issues raised by Dublin Regional Authority and National Transport Authority	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
2.1.6 Green Infrastructure			
i) Submission welcomes the development of a Green Infrastructure Strategy for the County.	A007		The contents of this submission have been noted.
2.1.7 Physical Infrastructure Strategy			
i) Submission supports the areas currently zoned for development, which will require the provision of water and wastewater infrastructure being delivered by Irish Water.	A007		The Council no longer has any direct control in relation to the provision of water and wastewater services. The delivery, integration and implementation of strategic water and wastewater projects and infrastructural improvements are now the responsibility of Irish Water. The Council will, however, continue to develop a close working relationship with Irish Water to achieve common objectives such as alignment with the RPGs settlement strategy and ensuring that the provision of water/wastewater services will not be a limiting factor in terms of delivering forecasted growth. This will be reflected within the Draft Plan.
2.1.8 Built Heritage Strategy			
i) The RPGs recognise the range of built heritage in DLR.	A007		The contents of this submission have been noted.
2.1.9 Community Strategy			
i) Submission recommends that population growth, the delivery of new housing and the needs of	A007		The contents of this submission have been noted.

Key Issue Issues raised by Dublin Regional Authority and National Transport Authority	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
existing communities should be supported by appropriate levels of necessary social infrastructure and recreational facilities to serve these communities.			
2.1.10 Environmental Considerations			
i) Submission requests that Development Plan policies should be informed and shaped by Environmental Directives.	A007		Development Plan policies will be informed and shaped by Environmental Directives.
ii) Submission requests that all relevant plans and infrastructure projects which have the potential to impact on Natura 2000 sites, either individually or in combination with other plans and projects, be assessed under the provisions of the Habitats Assessment Directive	A007		The Draft Plan will be subject to AA screening.
iii) Submission stresses the importance of the SEA process.	A007		The Council is aware of the importance of the SEA process and the need for this process to be ongoing and iterative in order to feed into the Development Plan process at every stage. The Council has already consulted with the EPA and NPWS prior to embarking on the process.

Key Issue Issues raised by Dublin Regional Authority and National Transport Authority	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
2.2 National Transport Authority (NTA)			
2.2.1 General			
i) Submission details the NTA functions within the preparation of a Development Plan as including: <ul style="list-style-type: none"> • transport investment priorities • maximizing the performance of the transport system by effective land-use planning • recommendations regarding the optimal use, location, pattern and density of development taking account of its Transport Strategy. 	A108		The contents of this submission have been noted.
2.2.2 Transport Investment Priorities			
i) Submission requests that the Draft Plan facilitates the priorities and objectives set out in the NTA's Integrated Implementation Plan.	A108		The contents of this submission have been noted.
2.2.3 GDA Cycle Network			
i) Submission requests that the GDA Cycle Network is reflected in the Draft Plan.	A108		The GDA Cycle Network Plan will inform the development of new cycle routes within the Draft Plan.

Key Issue Issues raised by Dublin Regional Authority and National Transport Authority	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
2.2.4 Bus Rapid Transport (BRT)			
i) Submission requests that the BRT route between N11 (UCD) and Blanchardstown, as detailed within the NTA's Integrated Implementation Plan, is reflected within the Draft Plan.	A108	1	As part of the NTA's Integrated Implementation Plan 2013 to 2018, a BRT route has been identified that links the City Centre to UCD (as part of Blanchardstown to UCD route) and a commitment is made to move the scheme to planning approval and construction over the 5-year period subject, however, to resources being available. No other routes have been identified as part of this Five Year Implementation Plan.
2.2.5 Bus Priority Measures			
i) Submission recommends that any proposals for bus priority take account of: <ul style="list-style-type: none"> • changes to the bus network since the plan was adapted and • any longer term changes to the network. 	A108		The current County Development Plan Policy T5 and Table 12.2 relating to the Quality Bus Network will be reviewed and updated as appropriate.
2.2.6 Bus Depot Locations			
i) Submission requests that the need for new bus depots be addressed in the Plan.	A108		The contents of this submission are noted but the Council would welcome further engagement with the NTA on this issue in early course.
2.2.7 Integration of Land Use and Transportation			
i) Submission requests that the key trip destination-	A108		The contents of the submission are noted. The preparation of the Draft Plan and its content

Key Issue Issues raised by Dublin Regional Authority and National Transport Authority	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
<p>focused principles related to optimising the integration of land use and transport are included as follows:</p> <ul style="list-style-type: none"> • High volume, trip intensive developments, such as offices and retail, should primarily be focused into Dublin City Centre and the larger Regional Planning Guidelines (RPG) higher order centres within the GDA • The role and function of District Centres and Neighbourhood Centres should be supported and promoted in order to exploit the levels of accessibility offered by public transport, walking and cycling at these locations • Except in limited circumstances, such as where specific physical requirements exist for the siting and operation of a particular land use, trip intensive developments or significant levels of development should not occur in locations not well served by existing or committed high quality public transport • The strategic transport function of national roads, including motorways, should be maintained by limiting the extent of development that would give rise to the generation of local car-based traffic on the national road network • All non-residential development proposals in the GDA should be subject to maximum parking standards and should vary spatially on the basis of centrality and the level of public transport provision 			<p>will be informed by the land-use and transportation policies contained within both the NTA's GDA Transport Strategy and the NTA's Integrated Implementation Plan.</p>

Key Issue Issues raised by Dublin Regional Authority and National Transport Authority	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
<ul style="list-style-type: none"> • In locations where the highest intensity of development occurs, an approach that caps car parking on an area-wide basis should be applied • For all major employment developments and all schools, travel plans should be conditioned as part of planning permissions and be carried out in a manner consistent with existing guidance. 			
<p>ii) Submission requests that the key origin-focused principles related to optimising the integration of land use and transport are included as follows:</p> <ul style="list-style-type: none"> • Residential development located proximate to high capacity public transport should be prioritised over development in less accessible locations in the GDA • To the extent practicable, residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites - are prioritised. 	A108		<p>The contents of the submission are noted. The preparation of the Draft Plan and its content will be informed by the land-use and transportation policies contained within both the NTA's GDA Transport Strategy and the NTA's Integrated Implementation Plan.</p>
<p>iii) Submission recommends that in relation to the development of individual sites, the following key principles are included:</p> <ul style="list-style-type: none"> • Planning at local level should promote walking, cycling and public transport by maximising the number of people living within walking/cycling distance of their district 	A108		<p>Many of the issues raised have merit and should be considered during the preparation of the Draft Plan. Existing County Development Plan Policies relating to Cycling, Walking, Public Transport and Rights-of-Way will be reviewed and updated and carried forward into the new Plan.</p>

Key Issue Issues raised by Dublin Regional Authority and National Transport Authority	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
<ul style="list-style-type: none"> centres, public transport and other services • New development area should be fully permeable for walking and cycling and the retrospective implementation of walking and cycling facilities should be undertaken where practicable, in existing neighborhoods • Development proposals should exploit opportunities to enhance the effectiveness of transport investment • The density and location of employment development should maximise the potential for the use of walking, cycling and public transport • Where possible, developments should provide for filtered permeability • To the extent practicable, proposals for right-of-way extinguishments should only be considered where it does not result in a more circuitous trip for local residents. 			
2.2.8 Core Strategy			
i) Submission recommends that a sequential approach is provided for in the Core Strategy and that zoned lands that are substantially outside of the catchment of the Luas Green Line and Dart station be subjected to an order of priority for their release for development and related to the delivery of future public transport infrastructure.	A108		<p>The Core Strategy in the existing County Development Plan elaborates on phasing, prioritisation and infrastructure delivery and identifies the primary growth nodes which will provide a significant portion of the supply of residential units up to 2022.</p> <p>These primary growth nodes are examined in detail in Appendix B of the existing Core Strategy and their public transport infrastructural deficiencies are highlighted as are the other infrastructure requirements such as water, drainage, roads and social and community.</p>

Key Issue Issues raised by Dublin Regional Authority and National Transport Authority	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
			The Core Strategy will be reviewed during the preparation of the Draft Plan and, to the extent practicable, will include an evidence based examination of the primary nodes to assess the priority and phasing attributed to them.

PART 3

SUMMARY OF MAIN ISSUES & CHIEF EXECUTIVE'S OPINION & RECOMMENDATIONS

SECTION 1
SUSTAINABLE COMMUNITIES STRATEGY

Key Issue Section 1: Sustainable Communities Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
1.1 Population and Housing			
1.1.1 Residential Land Supply			
<p>i) Submission states that the Council should carry out an audit of unused/underused urban land.</p> <p>Identify 'Action Areas' where NTA/Irish Water should focus investment – e.g. Old Conna.</p> <p>An analysis of projected housing need/land supply is offered. Submission states that 42,000 residential units will be required. Reference is made to recent CSO projections and it is stated that the CSO project a population level of 253,000 persons for DLR in 2022.</p> <p>Council should zone additional land around Old Conna to ensure servicing of lands is economically attractive to Irish Water.</p> <p>Submission concludes with essentially a rezoning request for greenbelt lands west of the M11.</p>	A078		<p>As part of the background research for the County Development Plan, the Planning Department undertakes an annual 'Housing Land Availability Study' which identifies available residential zoned lands. As part of this study, unused infill sites with development potential are identified. This study is a key input into the County Development Plan process.</p> <p>The Council will continue to work closely with Irish Water to ensure the servicing requirements of the LAP lands in the southern part of the County are addressed. Irish Water's recently published "Proposed Capital Investment Plan 2014-2016" includes a commitment to '<i>Continue the Planning and Business Case Review</i>' of the Old Connaught/Woodbrook Water (& Sewerage) Scheme.</p> <p>The submission proposes zoning additional lands in the area to "<i>ensure the servicing of lands is economically attractive to Irish Water</i>". The Planning Authority must adhere to the legislation in relation to formulating an evidence-based 'Core Strategy' when considering any additional zonings. The equilibrium between existing zoned residential land and future land requirements (as measured by population forecasts carried out at a Regional level) is the key consideration – rather than the practice of excessive zoning as a means of offsetting servicing costs.</p> <p>The submission offers an analysis of projected housing need in the County, stating that 1200 hectares of zoned residential land will be required to meet housing need as</p>

Key Issue Section 1: Sustainable Communities Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
			<p>determined by the current Regional Planning Guidelines – effectively a doubling of the existing quantum of zoned land. This analysis doesn't stand up to scrutiny in a number of respects. It is based on a baseline level of 75,000 households in the County. There are actually c.85,000 residential units in the County and housing estimates are derived from this baseline.</p> <p>Reference is made to recent CSO Regional Population Projections (2013). It is stated that the CSO project a population level of 253,000 for DLR in 2022. In fact, the CSO projections suggest a population level closer to 226,000 by 2022 (assuming that Dún Laoghaire retains its existing 16% share of Dublin's overall population). This projected growth suggests a housing need of c.20,000 new units, not 42,000 as referred to in the submission. Regardless, the Planning Authority is required to be consistent with the housing and population targets set by the Regional Planning Guidelines for the Greater Dublin Area (2010). These <i>targets</i> differ from 'raw' CSO population projections in that they seek to effectively shape regional policy, rather than simply express likely demographic trendlines.</p>
<p>ii) Submission requests that residential development be permitted in Sandyford on lands other than just residential.</p>	<p>A084</p>	<p>6</p>	<p>The submission is effectively a site specific rezoning request. A specific site is identified with a proposal to amend the zoning provisions at that site to allow for residential development. In recognition of recent amendments to primary planning legislation, on foot of the Planning and Development (Amendment) Act 2010, the Council cannot consider at this Pre-Draft stage of the County Development Plan process submissions or observations relating to the zoning and/or re-zoning of specific or particular parcels of land.</p>
<p>iii) Submission offers an analysis of residential land supply issues in the County. States that the recent low rate of house building limiting housing options for young people.</p> <p>In examining the amount of zoned residential</p>	<p>A089</p>		<p>The submission offers a critique of the existing Core Strategy and presents a case for additional residential rezoning. The Planning Authority have concerns in relation to the arguments put forward in the submission in relation to the land supply issue. The submission states that a significant extent of zoned residential land in the County is in other active use such as school/institutional uses. This therefore leads to an overstatement of realistically 'available' residential land. To clarify, the Housing Land</p>

Key Issue Section 1: Sustainable Communities Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
<p>land, the submission states that there is a significant extent of 'institutional' use in existing zoned residential land.</p> <p>In assessing the capacity of existing zoned lands to meet demand for housing, the submission concludes that an additional 200 hectares should be identified for rezoning.</p> <p>Submission notes recent (May 2014) Housing Agency Report forecasts are based on 2013 CSO Regional population projections and not on the Regional Planning Guidelines.</p>			<p>Availability (HLA) Study does <u>not</u> include school or institutional lands (which may be zoned residential for long established 'legacy' reasons). Only residential zoned lands that have a planning permission or are subject to planning activity (pre-plannings/Local Area Plans etc.) are included in the HLA assessment.</p> <p>Furthermore, in arriving at the conclusion that significant additional zoned lands are required, the submission states that a density of 34uph will apply on residential lands. A significant proportion of the lands in the HLA Study comprise infill sites, with potential for significantly higher residential density than suggested. The juxtaposition of major tranches of urban land in Dún Laoghaire-Rathdown with public transport corridors (DART, Luas, QBC) means that residential densities in excess of 50uph will often be promoted.</p> <p>The submission concludes with reference to the recently published Housing Agency report – "<i>Housing Supply Requirements in Ireland's Urban Settlements 2014 – 2018</i>", which presents housing forecasts for Dublin based on the most recent CSO Regional Population Projections from December 2013. It is telling that the submission fails to note the projections suggest a much lower rate of growth for Dún Laoghaire-Rathdown in the short-medium term. This lower rate is predominantly related to the substantial change in migration patterns in recent year. As this forecast clearly runs counter to the theme of the submission i.e. a call for additional residential rezoning – the submitter declines to examine its' implications in any depth.</p>
<p>iv) Submission focuses on the Old Conna LAP lands. States that demand for housing is strong in Dublin – no downzoning of land should be considered. Old Conna lands are capable of being delivered in the short term on a phased basis using interim service proposals. Existing policies in relation to residential density are appropriate. No additional lands should be rezoned until currently zoned lands are made</p>	A094	14	<p>A key component of the County Development Plan will be the Core Strategy, which will, as stated above, examine the equilibrium between existing zoned residential land (as measured by the Housing Land Availability Study) and future land requirements (as measured by population forecasts carried out at a Regional level). These two datasets will determine the Chief Executive's recommendation in relation the zoning of residential land in the next County Development Plan.</p> <p>The Planning Authority is required, by law, to maintain consistency with the Regional Planning Guidelines population targets when drafting the County Development Plan. The</p>

Key Issue Section 1: Sustainable Communities Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
<p>available for development through LAP process.</p>			<p>current County Development Plan (and the residential land use zonings) is based on the Regional Planning Guidelines 2010-2016, which remain in place during the drafting of the new Plan. The new RSES (Regional Spatial and Economic Strategies, which will succeed the RPGs) is unlikely to be published prior to the adoption of the new County Development Plan.</p> <p>In relation to the HLA Study, this Study is undertaken on an annual basis. As a result of minimal changes in development/zoning patterns in recent years, the most recent assessment of the amount of residential zoned land remains almost unchanged from the Core Strategy upon which the present County Development Plan is based.</p> <p>The fact that the two key datasets which will shape the new Core Strategy are virtually unchanged from the previous Core Strategy, suggests that the 'room for manoeuvre' in relation to any significant zoning/downzoning will be limited.</p>
<p>1.1.2 Housing for the Elderly</p>			
<p>i) A range of submissions addressed the issue of housing for the elderly, sheltered housing and Assisted Living accommodation.</p> <p>Development of retirement villages encouraged. The County has an ageing population. Council should identify sites for sheltered housing, consider joint development schemes and give loan guarantees to charitable bodies wishing to build.</p>	<p>A038 A050 A083 A114</p>		<p>Submissions on the topic of specialised housing for the elderly/sheltered accommodation/Assisted Living touched on a range of issues which will be relevant to the preparation of the new County Development Plan.</p> <p>The Chief Executive recognises the nuanced distinctions between the various typologies of specialised accommodation for the elderly and County Development Plan policy will be responsive to Housing Associations and other groups who wish to provide housing solutions in this regard. In relation to the Council's own building stock, it is noted that a sizeable number of specialised senior citizens accommodation developments have been designated.</p>

Key Issue Section 1: Sustainable Communities Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
<p>Submission on behalf of Irish Association Of Older People – Undertake a needs assessment of housing/community needs of older people. A site in Dún Laoghaire Town should be identified possibly using a public/private partnership.</p> <p>Submission addresses the 'Assisted living' concept. Provision of high quality accommodation which allows people to live as independently as possible in a home designed for their needs – shared areas/domiciliary care services/housekeeping etc. Policies in Plan should be updated to include a new use-class specifically referring to Assisted Living. Derogations from Part V should be expanded to include Assisted Living developments.</p> <p>The County has an older population. A range of accommodation options will be required. Include provision in Plan for niche housing/retirement villages. Submission states that no specific land use fully provides for 'retirement village' developments i.e. Zone A Residential would 'not allow' for ancillary shop/medical facilities. Current policy context indicates preference for locations proximate to urban centres. Submission claims this is contrary to 'desires of patrons' who require quiet, secure environments.</p>			<p>The issue of location of specialised housing for the elderly/nursing homes was addressed in one of the submissions, which stated on the one hand many older people are living longer more active lives and that multi stage accommodation should reflect this, but on the other hand the Planning Authority's preference for locations proximate to urban/suburban centres conflicted with the '<i>desires of patrons</i>' who '<i>require quiet, secure environments</i>'. The Planning Authority's position has been consistent that such facilities are best located within existing settlements where public services are available and where the occupants have some degree of access to shops and other social infrastructure and can more readily interface with their local community.</p> <p>In relation to the submission that states that no specific land use fully provides for 'retirement village', it is noted that – Zone 'A' Residential – does in fact, allow for a very broad range of ancillary support services and uses (e.g. medical/retail/services) complementary to a residential use.</p>

Key Issue Section 1: Sustainable Communities Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
1.1.3 Residential Density			
i) New development should be compatible with residential amenity. Housing schemes should be mixed developments of 2/3/4 bed homes. A mix of Council schemes should be provided – social housing/rental/hostel.	A014		The forthcoming County Development Plan will include policy on housing mix. The 'Lifecycle approach' - encouraging good housing mix which allows people the choice and potential opportunity to remain in a given area while availing of accommodation that caters to their changing needs at a particular stage of their life - is a core objective underpinning the guidelines ' <i>Delivering Homes, Sustaining Communities</i> ' (DoeHLG, 2007) and will inform policy in the new Plan.
ii) Submission states that the County Plan should reflect Government policy on appropriate densities proximate to public transport.	A047		The contents of this submission have been noted. County Development Plan policy in relation to residential density will be guided by the " <i>Sustainable Residential Development in Urban Areas- Guidelines for Planning Authorities (2009)</i> " which notes that " <i>minimum net densities of 50 dwellings per hectare, subject to appropriate design and amenity standards, should be applied within public transport corridors, with the highest densities being located at rail stations / bus stops, and decreasing with distance away from such nodes.</i> "
iii) Submission suggests that densities should be relaxed on smaller 'sub-optimal' sites even those juxtaposed to public transport corridors, as a means of meeting market demand. NTA's 'Kickstart' approach applicable only to larger sites.	A065		The assessment of appropriate residential density on smaller infill sites involves achieving a balance between the reasonable protection of the amenities and privacy of adjoining dwellings, the protection of established character and the overall prerogative to densify and provide residential infill. The Planning Authority must also have regard to the scarce nature of urban land and the potential cumulative negative effect of relaxing density standards at the whim of short-term market demands. As noted above, County Development Plan policy in relation to residential density will be guided by the " <i>Sustainable Residential Development in Urban Areas- Guidelines for Planning Authorities (2009)</i> ".
iv) Submission notes that in some contexts, own-door housing at medium densities (35uph) can	A078		Clearly, not all zoned residential areas are appropriate for higher density development and areas located within rail and QBC walking catchments may be more appropriately

Key Issue Section 1: Sustainable Communities Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
<p>be 'more' sustainable, is cheaper to build, less capital intensive than rail-based development.</p> <p>Other matrices of residential density should be used – bedspaces per hectare/units per hectare discriminates against 'family units'.</p>			<p>developed at medium densities, as suggested in the "<i>Sustainable Residential Development in Urban Areas- Guidelines for Planning Authorities (2009)</i>". It is anticipated that the forthcoming Development Plan will provide guidance on residential density bands in different parts of the County.</p> <p>The issue of how residential density is measured will also be given consideration in the new Plan. It is acknowledged that occupancy rates, such as persons or bed spaces per hectare, can be of use when an assessment of the numbers likely to live within a given area is important, e.g. in calculating open space requirements, or where special dwelling sizes – such as housing for the elderly – are likely to be involved.</p>
<p>v) Submission on behalf of the Dún Laoghaire BID Committee states that the residential population and density and building height should increase in the town.</p>	A095	3	<p>The contents of this submission have been noted. The relationship between population levels and the retail and commercial vibrancy of a town is well established. Demographic analysis presented in the 'Have Your Say' document highlighted the substantial population decline in the environs of Dún Laoghaire over the past 20 years. The County Development Plan will provide density and building height guidance for Major Town Centre areas with this consideration in mind.</p>
<p>vi) Housing densities could be increased, particularly near public transport corridors.</p>	A101		<p>The contents of this submission have been noted – see response 1.1.3 ii) above.</p>
<p>vii) Focus on medium/high density housing based around convenient transport. A limited amount of rezoning should be carried out if necessary. Majority of housing should be for families (2,3 bed) with lesser focus on 1,4 bed.</p>	A112		<p>The contents of this submission have been noted – see response 1.1.3 ii) above.</p>
<p>viii) Market demand for apartments is limited. Council may be forced to loosen density requirements to accommodate housing construction. A 'pragmatic' approach to density</p>	A116		<p>The forthcoming County Development Plan must have regard to national policy guidance on residential density as set out in "<i>Sustainable Residential Development in Urban Areas-Guidelines for Planning Authorities (2009)</i>". The case advanced in the submission – "<i>loosening density policy</i>" or "<i>completely reviewing density requirements</i>" would</p>

Key Issue Section 1: Sustainable Communities Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
<p>should prevail – within 500m of transport corridor, not where ground conditions are unsuitable for carpark building.</p> <p>Requirements for higher density will have to be completely reviewed in light of big ticket transport schemes being shelved.</p>			<p>represent, in the opinion of the Chief Executive, an abandonment of the principles of sustainable development in favour of short term market demands.</p> <p>The Planning Authority has shown pragmatism and flexibility, in collaborating with the NTA and other Dublin Local Authorities in the formulation of the 'Kickstart' Incremental Development Approach. This approach, set out in the recently published <i>"Planning and Development Of Large-Scale, Rail Focussed Residential Areas In Dublin"</i> (2013), proposes that lower density development can be permitted initially as part of a planned approach to deliver to the overall planned densities over a longer term. In particular the report proposes possible solutions to enable the viable and sustainable development of these areas over the longer term. A key aim of this approach is to <i>"retain key high density locations for later development phases"</i>. The Chief Executive is satisfied that the targeted, planned approach to managing density is essential in ensuring an outcome that adheres to the principles of sustainable development.</p> <p>The longer-than-expected lead in time for the delivery of the Luas Line B2 to Fassaroe will certainly have implications for the timing of development of Local Area Plan lands to be served by the rail corridor. The Chief Executive is firmly of the opinion that the wholesale reduction in residential density in these areas is not a sustainable or reasonable response to this delay.</p>
<p>1.1.4 Miscellaneous</p>			
<p>i) A 'more nuanced' zoning scheme is required – too broad at present.</p> <p>A menu of housing schemes should be pursued – traditional build/co-op scheme/ rent to let etc</p>	<p>A008</p>		<p>The review of the County Development Plan offers an opportunity to refine and improve the land use zoning objectives and the myriad land uses that are permitted in principle/open for consideration therein. It is intended that the land use zoning matrix will be reviewed and consideration given to additions and deletions where improvements can be made.</p>

Key Issue Section 1: Sustainable Communities Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
			The Housing Strategy review will provide an opportunity to incorporate all of the mechanisms currently available for social/affordable housing provisions, where resources allow.
ii) Crosscare homeless provision services at Carlisle Terrace, Dún Laoghaire are having a negative impact on residential amenity and should be 'spread around' the County more evenly.	A013	3	The forthcoming County Development Plan and Housing Strategy must seek to strike a balance between providing for the needs of all citizens requiring social housing supports, including those who are homeless, rough sleeping or at risk of homelessness and ensuring protection of amenities in residential areas. The contents of this submission are noted and will be considered during the preparation of the Draft Plan.
iii) Submission suggests the possibility of a community 'self build' as a means of allowing young people to live in the area they grew up in – competition for sites/houses on the open market being unaffordable for most younger people.	A019		<p>The submission proposes a community 'self build' initiative. It is not stated explicitly in the submission, but the implication is that the Council would somehow subsidise or provide gratis the land for such a project.</p> <p>In principle, the Housing Department will support any proposal and will consider any application from a group/co-operative/approved housing body for a site for the construction of housing for <i>qualified housing applicants</i>. In this respect Applicants being considered for housing accommodation must satisfy the Council that they are eligible for Social Housing Support and have a housing need. In practical terms, it would be necessary for the interested qualified housing applicants to form a co-operative or housing body before the Council will consider disposal of a site or lands. It would be the responsibility of the co-operative to source and obtain the necessary funding/financing, and also to obtain the required planning permission and building control/fire safety certificates.</p>
iv) Submission states that the Housing Strategy should note the need to supply long term supported housing for chronically homeless – currently facilities available in Dublin City only. If the Council could facilitate long-term supported housing, Bentley House could focus	A102		The contents of this submission are noted and will be considered during the preparation of the Draft Plan and the Housing Strategy.

Key Issue	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
<p>Section 1: Sustainable Communities Strategy</p>			
<p>on emergency temporary accommodation. Plan should also fully implement national policy aimed at alleviating homelessness and also address the particular needs of the county's homeless, the majority of whom consist of 1 person households. The one-bedroom sector should be a focus for the Plan.</p>			
<p>1.2 Sustainable Transportation and Travel</p>			
<p>1.2.1 Sutton to Sandycove (S2S) Cycle Route</p>			
<p>i) Various submissions stating support for the S2S proposed cycle/pedestrian route and / or a cycleway along the coast.</p>	<p>A002 A008 A014 A033 A043 A045 A051 A058 A059 A099</p>	<p>2 3</p>	<p>The proposed S2S Promenade and Cycleway forms part of the East Coast Trail within the Greater Dublin Area Cycle Network Plan. The full route of S2S straddles the administrative areas of Fingal, Dublin City and Dún Laoghaire-Rathdown.</p> <p>It should be noted that this coastal route will be subject to a feasibility study including an assessment of route options. Any development proposals shall be subject to Appropriate Assessment Screening in accordance with the requirements of the EU Habitats Directive to ensure the protection and preservation of all designated Special Protection Areas (SPAs), Special Areas of Conservation (SACs), and (proposed) Natural Heritage Areas (pNHAs) of Dublin Bay and surrounding areas.</p> <p>The National Transport Authority (NTA) has confirmed its intention to procure a specialist consultant to evaluate all options for the section of the route between Sandymount Strand and Booterstown Marsh. The study will be undertaken by the NTA with the active</p>

Key Issue	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
<p>Section 1: Sustainable Communities Strategy</p>			<p>involvement of Dún Laoghaire-Rathdown and Dublin City.</p>
<p>ii) Submission requests that a cycle/walk way from Howth to Bray should be constructed a few metres above sea-level but well below the height of the cliffs to act as a barrier to the sea.</p>	<p>A051</p>	<p>2 3 4 7 10 14</p>	<p>The contents of this submission have been noted – see response 1.2.1 i) above.</p>
<p>iii) Submission notes the scope for accommodating the S2S cycle route through the Harbour Masterplan Area.</p>	<p>A099</p>	<p>3</p>	<p>The contents of this submission have been noted.</p>
<p>1.2.2 Cycling and Walking</p>			
<p>i) Various submissions were received expressing support for cycling and walking. The contents of these suggestions/recommendations are listed below.</p>			<p>General Response: Many of the issues raised in the submissions below under this topic heading have merit and will be considered during the preparation of the Draft Plan. Policy T2 and Policy T12 of the current County Development Plan relating to the Development of Sustainable Travel and to Cycling and Walking should be updated and carried forward into the preparation of the Draft Plan.</p> <p>The Council's Cycle Network and the Greater Dublin Area Cycle Network Plan will help inform the development of new cycle routes in the County and subsequent links to help create more permeable walking and cycling routes.</p> <p>In accordance with the 'Urban Design Manual – a Best Practice Guide', (DEHLG 2008) and</p>

Key Issue Section 1: Sustainable Communities Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
			'Design Manual for Urban Roads and Streets' (DECLG and DTTaS 2013) new development is required to maximise permeability and connectivity for pedestrians and cyclists, in order to create direct attractive links to adjacent roads, public transport and existing nearby development. The Design Manual for Urban Roads and Streets' aims to end the practice of designing streets as traffic corridors, and instead focus on the needs of pedestrians, cyclists and public transport users.
ii) Submission requests that the Development Plan place an emphasis on slow modes of transport and cater for pedestrians and cyclists through a range of measures. Focus on prioritising pedestrians in residential areas.	A008 A017		The contents of this submission have been noted – see response to 1.2.2 i) above.
iii) Submission seeks to encourage the Council to develop dedicated cycle lane infrastructure where feasible.	A032		The contents of this submission have been noted – see response to 1.2.2 i) above.
iv) Submission asks for support for cycling/walking to UCD, welcomes improvements to the cycle network and potential for extension of a cycle sharing scheme to the County.	A037	1 2	The contents of this submission are noted and a policy in relation to Public Bike Facilities shall be considered during the preparation of the Draft Plan.
v) Submission seeks support for expansion of existing cycle routes.	A045		The Council's Cycle Network and the Greater Dublin Area Cycle Network Plan will help inform the development of new cycle routes in the County and subsequent links to help create more permeable walking and cycling routes. This will be considered during the preparation of the Draft Plan.
vi) Submission requests the designation of Quinn's Road East as a pedestrian priority zone and the development of a cycle path alongside the pedestrian walk between Killiney beach and	A051	10	The Council's Cycle Network and the Greater Dublin Area Cycle Network Plan will help inform the development of new cycle routes in the County and subsequent links to help create more permeable walking and cycling routes. This will be considered during the preparation of the Draft Plan.

Part 3: Summary of Main Issues & Chief Executive's Opinion & Recommendations

Key Issue Section 1: Sustainable Communities Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
Seafield.			
vii) Submission seeks support for the widening of access times for bicycles on the Dart.	A051 A058		This issue is not within the remit of the Local Authority. It is an operational issue for the NTA and Iarnród Éireann.
viii) Submission expresses concern that the cycle track at St. Columbanus is poorly planned and is putting school children at risk. General condition of roads/pathways in the estate deemed to have deteriorated immensely since the opening of the Luas.	A071	1	The contents of the submission are noted, however this is not considered a strategic County Development Plan issue but a roads maintenance issue.
ix) Submission requests that consideration should be given to providing a cycle racing facility in the new Jamestown Regional Park to be developed on the site of the remedial Ballyogan landfill.	A090	9	The contents of this submission are noted and will be considered during the preparation of the Draft Plan.
x) Submission requests that priority be given to pedestrians using paths throughout the County and ensuring that they are fit and safe to walk on. Submission also expresses concern over the dangerous condition of footpaths in Stillorgan Road area.	A092	2 6	The contents of the submission are noted, however this is not considered a strategic County Development Plan issue but a roads maintenance issue.
xi) Submission expresses support for cycling and walking and also enhanced pedestrian access to the Harbour Area of Dún Laoghaire.	A099	3	The contents of this submission have been noted.

Key Issue Section 1: Sustainable Communities Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
xii) Submission requests that two-way streets with low traffic volumes be reduced to one-lane with dedicated cycling lane.	A100		The contents of this submission have been noted.
xiii) Submission requests: <ul style="list-style-type: none"> • Protect and promote greenways and consider designating them public rights-of-way • Support traffic free cycleways • Appoint a Cycling Officer and for the Plan content to include NCPF and Fáilte Ireland strategies among other strategies mentioned • Include content promoting the economic advantages of walking • Protect the access routes to existing rights-of-way/upland walks. 	A101		<p>Many of the issues raised in the submissions below under this topic heading have merit and will be considered during the preparation of the Draft Plan. Policy T2 and Policy T12 of the current County Development Plan relating to the Development of Sustainable Travel and to Cycling and Walking should be updated and carried forward into the preparation of the Draft Plan.</p> <p>The Council's Cycle Network and the Greater Dublin Area Cycle Network Plan will help inform the development of new cycle routes in the County and subsequent links to help create more permeable walking and cycling routes.</p> <p>In accordance with in the 'Urban Design Manual – a Best Practice Guide', (DEHLG 2008) and 'Design Manual for Urban Roads and Streets' (DECLG and DTTaS 2013) new development is required to maximise permeability and connectivity for pedestrians and cyclists, in order to create direct attractive links to adjacent roads, public transport and existing nearby development. The Design Manual for Urban Roads and Streets' aims to end the practice of designing streets as traffic corridors, and instead focus on the needs of pedestrians, cyclists and public transport users.</p>
xiv) Submission requests that the GDA cycle network is reflected in the new Development Plan.	A108		The GDA Cycle Network Plan will inform the development of new cycle routes within the Draft Plan.
xv) Submission requests signposting and wayfinding on rights-of-way to notify walkers that a right-of-way exists and protection/promotion of public rights-of-way.	A117		Policy T23 of the current County Development Plan sets out Council policy in relation to Waymarking Signage. It is envisaged that this will be carried forward into the consideration of the Draft Plan.

Key Issue Section 1: Sustainable Communities Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
xvi) Submission advocates: <ul style="list-style-type: none"> • The integration of attractive and safe walking and cycling routes connecting the future terminus of Luas Line B2 to employment/residential centres. • The need to avoid segregation of pedestrians/cyclists from Luas lines in future street networks. 	A119		The contents of this submission are noted and will be considered during the preparation of the Draft Plan.
1.2.3 Integration of Land Use and Transportation			
i) Submission requests that the new Plan continues to support sustainable transportation policies with appropriate objectives such as higher densities near public transport corridors and nodes.	A007 A017 A038 A047 A099 A108 A112 A119		Existing County Development Plan Policy T1 relating to 'Integration of Land Use and Transportation Policies' will be updated and carried forward into the Draft Plan.
ii) Submission requests that District Centres should be easily accessible by walking, cycling and public transport.	A014		The contents of this submission have been noted and agreed.
iii) Submission requests that the NTA's Draft Transport Strategy must be followed.	A017 A095		The Draft Plan will be consistent with the NTA's Draft GDA Transport Strategy.

Key Issue Section 1: Sustainable Communities Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
iv) Submission requests that a Local Transport Plan be prepared alongside the Development Plan setting out how the objectives of the National Smarter Travel Policy will be achieved.	A017		The specific thrust of this submission and the ability / resources to deliver same will be examined during the preparation of the Draft Plan.
v) Submission indicates that Mobility Management Plans must be mandatory for all applications – including one-off houses- and demonstrate how the objectives of Smarter Travel can be achieved.	A017		All developments above a certain size threshold and all schools are required to develop a Workplace Travel Plan as per Smarter Travel, the National Transport Policy, and in accordance with National Transport Authority Guidelines.
vi) Submission recommends that the Plan reflects Government policy on land use near public transport corridors and explore other options for public transport if major projects do not go ahead.	A047		The contents of this submission have been noted and agreed. The Draft Plan will be consistent with the guidance set out in the 'Sustainable Residential Developments for Urban Areas (2009)' and the NTA's Draft GDA Transport Strategy.
vii) Submission requests that the Plan maintain objectives for high density developments on lands to be served directly by public transport connections in the long term (Old Conna).	A094	14	The contents of this submission have been noted and agreed. Existing County Development Plan Policy T1 relating to 'Integration of Land Use and Transportation Policies' should be updated and carried forward into the new Development Plan.
viii) Submission requests that the key trip destination-focussed principles related to optimising the integration of land use and transport are included as follows: <ul style="list-style-type: none"> • High volume, trip intensive developments, such as offices and retail, should primarily be focussed into Dublin City Centre and the larger Regional Planning Guidelines (RPG) 	A108		The contents of the submission are noted. The preparation of the Draft Plan will be informed by the land-use and transportation policies contained within both the NTA's GDA Transport Strategy and the NTA's Integrated Implementation Plan.

Key Issue Section 1: Sustainable Communities Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
<p>higher order centres within the GDA.</p> <ul style="list-style-type: none"> • The role and function of district centres and neighbourhood centres should be supported and promoted in order to exploit the levels of accessibility offered by public transport, walking and cycling at these locations. • Except in limited circumstances such as where specific physical requirements exist for the siting and operation of a particular land use, trip intensive developments or significant levels of development should not occur in locations not well served by existing or committed high quality public transport. • The strategic transport function of national roads, including motorways, should be maintained by limiting the extent of development that would give rise to the generation of local car-based traffic on the national road network. • All non-residential development proposals in the GDA should be subject to maximum parking standards and should vary spatially on the basis of centrality and the level of public transport provision. 			

Key Issue Section 1: Sustainable Communities Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
<ul style="list-style-type: none"> • In locations where the highest intensity of development occurs, an approach that caps car parking on an area-wide basis should be applied • For all major employment developments and all schools, travel plans should be conditioned as part of planning permissions and be carried out in a manner consistent with existing guidance. 			
<p>ix) Submission requests that the key origin focussed principles related to optimising the integration of land use and transport are included as follows:</p> <ul style="list-style-type: none"> • Residential development located proximate to high capacity public transport should be prioritised over development in less accessible locations in the GDA. • To the extent practicable, residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites - are prioritised. 	A108		<p>The contents of the submission are noted. The preparation of the Draft Plan will be informed by the land-use and transportation policies contained within both the NTA's GDA Transport Strategy and the NTA's Integrated Implementation Plan.</p>
<p>x) Submission recommends that in relation to the development of individual sites, the following key principles are included:</p>	A108		<p>Many of the issues raised have merit and should be considered during the preparation of the Draft Plan. Existing County Development Plan Policies relating to Cycling, Walking, Public Transport and Rights-of-Way will be reviewed and updated and carried forward</p>

Key Issue Section 1: Sustainable Communities Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
<ul style="list-style-type: none"> • Planning at local level should promote walking, cycling and public transport by maximising the number of people living within walking/cycling distance of their district centres, public transport and other services. • New development areas should be fully permeable for walking and cycling and the retrospective implementation of walking and cycling facilities should be undertaken where practicable, in existing neighborhoods. • Development proposals should exploit opportunities to enhance the effectiveness of transport investment. • The density and location of employment development should maximise the potential for the use of walking, cycling and public transport. • Where possible, developments should provide for filtered permeability. • To the extent practicable, proposals for right of way extinguishments should only be considered where it does not result in a more circuitous trip for local residents. 			<p>into the Draft Plan.</p>

Key Issue Section 1: Sustainable Communities Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
1.2.4 Permeability			
i) Submission expresses opposition to permeability and requests that there be no intrusion (either vehicular or pedestrian) into Corke Abbey Estate.	A003	14	<p>The specific access arrangements at Corke Abbey are not considered a Strategic Development Plan issue.</p> <p>However, in accordance with in the 'Urban Design Manual – a best practice guide', (DEHLG 2008) and 'Design Manual for Urban Roads and Streets' (DECLG and DTTaS 2013) new development is required to maximise permeability and connectivity for pedestrians and cyclists, to create direct attractive links to adjacent roads, public transport and existing nearby development. The Design Manual for Urban Roads and Streets' aims to end the practice of designing streets as traffic corridors, and instead focus on the needs of pedestrians, cyclists and public transport users.</p> <p>The Council Cycle Network and the Greater Dublin Area Cycle Network Plan will help inform the development of new cycle routes in the County and subsequent cycle links to help create more permeable walking and cycling routes.</p>

Key Issue Section 1: Sustainable Communities Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
<p>ii) Submissions emphasises support for permeability to facilitate/promote cycling and walking.</p> <p>However, one submission advocates that each case must be decided on its own merits to ensure that resident's health and safety/security concerns are taken into account.</p>	<p>A017 A032 A043 A099 A100 A105 A108 A112 A117 A119</p>		<p>Many of the issues raised in the submissions have merit and should be considered during the preparation of the Draft Plan. Existing County Development Plan Policy T12 relating to Cycling and Walking should be updated and carried forward into the new Plan.</p> <p>In accordance with in the 'Urban Design Manual – a best practice guide', (DEHLG 2008) and 'Design Manual for Urban Roads and Streets' (DECLG and DTTaS 2013) new development is required to maximise permeability and connectivity for pedestrians and cyclists, to create direct attractive links to adjacent roads, public transport and existing nearby development. The Design Manual for Urban Roads and Streets' aims to end the practice of designing streets as traffic corridors, and instead focus on the needs of pedestrians, cyclists and public transport users.</p> <p>The Council Cycle Network and the Greater Dublin Area Cycle Network Plan will help inform the development of new cycle routes in the County and subsequent cycle links to help create more permeable walking and cycling routes.</p>
<p>iii) Submission requests that the Development Plan contain the overall objective of significantly reducing travel demand by creating compact walkable settlements and include detailed policies on walking and cycling (including permeability and way-finding studies to identify a safe network of existing/future walking and cycling routes which should be used as the primary criteria in relation to the selection of Lands appropriate for development.</p>	<p>A017</p>		<p>The contents of this submission have been noted – see response to 1.2.4 ii) above.</p>

Key Issue Section 1: Sustainable Communities Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
iv) Submission requests that the Development Plan ensures a high standard of permeability throughout the Harbour Area and for appropriate provision of pedestrian connectivity to the Town Centre.	A099		The contents of this submission have been noted – see response to 1.2.4 ii) above. In addition, the contents of this submission should be examined more closely in the context of any future process for considering and formulating an overall strategy and vision for the Dún Laoghaire Town Centre and Environs area.
v) Submission requests that permeability and connectivity issues to and from proposed Luas termini (at Fassaroe and Bray town) are addressed in the Development Plan.	A119		The contents of this submission have been noted – see response to 1.2.4 ii) above. In addition, the Council will strive to work alongside both the NTA and the Luas operators to ensure the issues highlighted are addressed.
1.2.5 Bus Rapid Transit (BRT)			
i) Submissions requested that BRT should be extended to Brewery Road and Bray and from Sandyford Business District to UCD.	A001 A074 A078	1 2 6 10 14	The delivery, integration and implementation of public transport infrastructural projects is no longer within the remit of the Local Authority but fall under the auspices of the NTA. Any decisions on additional BRT routes will be decided by the NTA. The Council will however engage with the NTA in relation to the issue raised. It should be noted that the 'Blue Line BRT' - from Sandyford to the Dart line at Sydney Parade – is included under Policy T9 of the existing County Development Plan. In addition, the 'Blue Line' is also included within the NTA's Draft GDA Transport Strategy, subject to assessment by the NTA. The 'Blue Line' is, however, not included within the NTA's Integrated Implementation Plan 2013-2018 list of projects to be delivered over the next five years.
ii) Submissions advocate that BRT - and /or bus based options - should be provided in lieu of the proposed Luas lines and/or other public transport options should be explored if major	A001 A047 A078 A094		As stated above, the delivery, integration and implementation of public transport infrastructural projects is no longer within the remit of the Local Authority but fall under the auspices of the NTA. The Council will however continue to develop a close working relationship with the NTA to achieve common objectives such as alignment with the RPGs

Key Issue Section 1: Sustainable Communities Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
<p>projects do not go ahead.</p>			<p>settlement strategy and to ensure that the provision of high quality public transport infrastructure will not be a limiting factor in terms of delivering forecasted growth in the County.</p> <p>Any decisions on BRT or bus-based services replacing long-term light rail projects will be decided on by the NTA. The Council will engage with the NTA in relation to the issues raised.</p>
<p>iii) Submission requests that the BRT route between N11 (UCD) and Blanchardstown, as detailed within the NTA's Integrated Implementation Plan is reflected within the Draft Plan.</p>	<p>A037 A038 A073 A108</p>	<p>1</p>	<p>As part of the National Transport Authority Integrated Implementation Plan 2013 to 2018, a BRT route has been identified that links City Centre to UCD (as part of Blanchardstown to UCD route) and a commitment is made to move the scheme to planning approval and construction over the 5-year period subject, however, to resources being available. No other routes have been identified as part of this five year Implementation Plan.</p>
<p>1.2.6 Bus</p>			
<p>i) Submission states that many bus lanes throughout the County and specifically on Glenageary Road are used very infrequently. These bus lanes should be decommissioned.</p>	<p>A032 A085</p>	<p>3</p>	<p>The licensing of bus routes is a matter for the National Transport Authority. However the Council will engage with the NTA in relation to the issues raised.</p>
<p>ii) Submission recommends that any proposals for bus priority take account of:</p> <ul style="list-style-type: none"> • changes to the bus network since the plan was adopted and • also any longer term changes to the network. 	<p>A032 A108</p>		<p>Current County Development Plan Policy T5 and Table 12.2 relating to the Quality Bus Network should be revisited and updated in the Draft Plan.</p>

Key Issue Section 1: Sustainable Communities Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
iii) Submission requests that the need for new bus depots to be addressed in the plan.	A108		The contents of the submission are noted and DLR welcomes further engagement from the NTA on this issue.
iv) Submission supports further improvements to bus services.	A037		Current County Development Plan Policy T5 and Table 12.2 relating to the Quality Bus Network should be revisited and updated in the new Plan.
v) Submission voices concerns in relation to: <ul style="list-style-type: none"> • the reduction in bus services (and public transport services generally) at weekends and • the high costs associated with same. 	A037 A112		The licensing of bus routes is a matter for the National Transport Authority. However the Council will engage with the NTA in relation to the issues raised.
1.2.7 Taxi			
i) Submission requests the provision of a dedicated Taxi Rank in Cornelscourt Village (and near Dunne's Stores).	A069	6 7	The current County Development Plan Policy T8 relating to Taxi/Minibus/Hackney Transport should be re-examined and revised as appropriate and incorporated in the Draft Plan.
1.2.8 Luas			
i) Submission recommends the proposed extension of the Green Luas Line Luas to Bray be replaced by BRT.	A001	10 14	The delivery, integration and implementation of public transport infrastructural projects is no longer within the remit of the Local Authority but fall under the auspices of the NTA. Any decisions on BRT or bus-based services replacing long-term light rail projects will be decided on by the NTA. The Council will however engage with the NTA in relation to the issue raised.

Key Issue Section 1: Sustainable Communities Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
ii) Submissions expressed the view that Shankill/Bray is already well served by public transport. Submissions also recommend the Luas Green Line to be extended from Brides Glen to serve Loughlinstown Hospital and / or North Shankill.	A017 A020 A021 A022 A024 A025 A026 A028 A036 A040 A043 A045 A054 A064 A075 A098 A100	10 14	<p>As stated above, the delivery, integration and implementation of public transport infrastructural projects is no longer within the remit of the Local Authority but fall under the auspices of the NTA. The Council will however continue to develop a close working relationship with the NTA to achieve common objectives such as alignment with the RPGs settlement strategy and to ensure that the provision of high quality public transport infrastructure will not be a limiting factor in terms of delivering forecasted growth in the County.</p> <p>Any decisions on amendments to long-term light rail projects will be decided on by the NTA. The Council will engage with the NTA in relation to the issues raised.</p>
iii) Submission details concerns regarding the safety of schoolchildren on Stonebridge Road if Luas Green Line extended beyond Brides Glen.	A021	10	The contents of this submission are noted and will be considered during the preparation of the Draft Plan.
iv) Submission details concern that the location of the Luas Green Line between the South County Business Park and Central Park effectively creates a significant barrier between the two areas.	A084	6	The extension of the Luas Green Line to Brides Glen and the creation of a Luas stop in Central Park has undoubtedly improved access to the overall Sandyford Business District with good access routes to all nearby offices and commercial complexes – including South County Business Park.
v) Submission opposed moving forward with alternatives to Luas Line B2.	A112	10 14	The delivery, integration and implementation of public transport infrastructural projects is no longer within the remit of the Local Authority but fall under the auspices of the NTA. The Council will however continue to develop a close working relationship with the NTA to achieve common objectives such as alignment with the RPGs settlement strategy and to

Key Issue Section 1: Sustainable Communities Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
			<p>ensure that the provision of high quality public transport infrastructure will not be a limiting factor in terms of delivering forecasted growth in the County.</p> <p>Any decisions on BRT or bus-based services replacing long-term light rail projects will be decided on by the NTA. The Council will engage with the NTA in relation to the issues raised.</p>
vi) The RPA request that the corridor for Luas Line B2 continue to be preserved and identified on County Development Plan maps.	A119	10 14	The specific contents of this submission will be examined during the preparation of the Draft Plan.
1.2.9 Public Transport General			
i) Submission requests Local Authorities form a coherent lobby group to press for the introduction of a fairer public transport charging scheme.	A032		Public transport price fixing is not within the remit of the Local Authority but falls under the auspices of the NTA. The Council will however, continue to develop a close working relationship with the NTA to achieve common objectives such as more equitable public transport price structure within a high quality public transport network. In this regard the 'Leap' card has been introduced alongside well-established tax-breaks for regular public transport users.
ii) Submission supports improved access by public transport to retail developments	A038		<p>The contents of this submission are noted and will be considered during the preparation of the Draft Plan.</p> <p>The development of Public Transport Corridors will be in accordance with the requirements set out in the NTA's Integrated Implementation Plan 2013 to 2018 and the NTA's overall Draft GDA Transport Strategy.</p>

Key Issue Section 1: Sustainable Communities Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
iii) Submission expresses strong concerns relating to the lack of public transport within Foxrock.	A046	6	<p>The delivery, integration and implementation of public transport infrastructural projects is no longer within the remit of the Local Authority but fall under the auspices of the NTA.</p> <p>However it should be noted that Foxrock is, in relative terms, well served by public transport. The N11, which is in close proximity, is a high frequency, high capacity priority bus corridor with the 46A operating at nine minute intervals during the peak hours.</p> <p>In addition, Foxrock is located in close proximity to both Carrickmines Luas stop Brennanstown Luas stop, with the Luas Green line operating at 4-10 minute intervals during the peak hours.</p>
iv) Submission raises concerns in relation to public transport waiting times plus journey time to services. Inadequate coverage of resting places and / or shelters.	A073		<p>The delivery, integration and implementation of public transport infrastructure is not within the remit of the Local Authority but falls under the auspices of the NTA. The Council will however, continue to develop a close working relationship with the NTA to achieve common objectives such as improving journey times and improving inadequate resting places / shelters.</p>
v) Submission requests that policy must focus on facilitating and promoting Dún Laoghaire Town Centre by all modes of transport – including public transport, walking and cycling.	A095	3	<p>The issue raised in the submission has merit and will be considered during the preparation of the Draft Plan.</p>
vi) Submission requests that the Draft Plan facilitates the priorities and objectives set out in the NTA's Integrated Implementation Plan.	A108		<p>The contents of this submission have been noted.</p>

Key Issue Section 1: Sustainable Communities Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
1.2.10 Traffic Calming and Management			
i) Submission indicates that the road network around Dún Laoghaire Harbour is not capable of accommodating passengers from cruise liners.	A006	3	This is a Development Management issue. It is considered, nevertheless, that with considered and properly implemented Traffic Management Plan the road network around Dún Laoghaire Harbour has sufficient capacity to facilitate the envisaged traffic movement associated with cruise liner activity.
ii) Submission urges the Council to engage with residents on traffic management issues. One submission recommends the implementation of traffic management measures to benefit walking and cycling.	A008 A014 A017 A033 A095		Individual Traffic Management Schemes are generally subject to comprehensive public consultation and dialogue. However further improvements in relation to public consultation protocols and engagement with affected communities will be considered further.
iii) Submissions requests roads/areas where traffic calming and traffic management are sought including: <ul style="list-style-type: none"> • Tivoli Road • Foxrock • Priorsland Link Road • Dundrum • Rathmichael • Glenageary • Kill Avenue • Baker's Corner • Sallyglen Road • Rochestown Avenue • Killiney Hill Road 	A013 A043 A046 A066 A072 A085 A101 A112		<p>The Council's "Traffic Calming Prioritisation Programme" sets out the criteria for the provision of traffic calming on roads within the County. The priorities identified in the programme will be reflected in the new County Development Plan. This document was produced following detailed technical analysis of various criteria (road collision assessment, speed analysis, traffic volumes etc) and a period of comprehensive public consultation.</p> <p>Many of the issues raised in the submissions have merit and should be considered during the preparation of the Draft Plan. Existing County Development Plan Policy T12 relating to Cycling and Walking should be updated and carried forward into the new Plan.</p> <p>In accordance with in the 'Urban Design Manual – a best practice guide', (DEHLG 2008) and 'Design Manual for Urban Roads and Streets' (DECLG and DTTaS 2013) new development is required to maximise permeability and connectivity for pedestrians and cyclists, to create direct attractive links to adjacent roads, public transport and existing</p>

Key Issue Section 1: Sustainable Communities Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
<ul style="list-style-type: none"> • Haigh Terrace • Countywide 			nearby development. The Design Manual for Urban Roads and Streets' aims to end the practice of designing streets as traffic corridors, and instead focus on the needs of pedestrians, cyclists and public transport users.
iv) Submission outlines residents' perception that traffic management measures are punitive and anti-car.	A032 A073		The purpose of traffic management measures are to improve the safety and accessibility of an area for all modes and are not intended to be 'anti-car'. In addition, individual Traffic Management Schemes are generally subject to comprehensive public consultation.
1.2.11 Park and Ride			
i) Submissions advocate providing car parking facilities and feeder buses to encourage use of public transport. Submissions focused primarily at Brides Glen and Cherrywood Luas Stations.	A045 A051 A085	10	A Park and Ride has been permitted adjacent to Brides Glen Luas stop. On-road car parking and facilities for feeder buses have been provided. Policy T7 'Park and Ride' of the existing Plan will be reviewed and updated during the preparation of the Draft Plan.
ii) Submission reiterates the potential for two public transport interchange (with feeder buses to the Luas Green line and proposed BRT) in the Sandyford Business District area.	A074	6	<p>It should be noted that SLO 114 of the current County Development Plan makes provision '<i>To Provide a Public Transport Interchange along Blackthorn Avenue</i>'. This will be reviewed and updated as appropriate.</p> <p>The delivery, integration and implementation of public transport infrastructure –including feeder buses - is not within the remit of the Local Authority but falls under the auspices of the NTA. The Council will however, continue to develop a close working relationship with the NTA to achieve common objectives such as improving public transport connections.</p>

Key Issue Section 1: Sustainable Communities Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
1.2.12 Parking Standards			
i) Submission advocates that car parking charges be made mandatory in out of town retail and commercial developments to 'level the playing field' and end unfair competitive advantage accruing to out-of-town retailers.	A017		The issue of the setting of parking charges is clearly an operational matter and not considered appropriate in the context of the Draft Plan.
ii) Submission issues support for the continued consolidation and rationalisation of parking on the UCD campus through a range of measures.	A037	1 2	The contents of this submission have been noted.
iii) Submission seeks setting of minimum levels of parking provision for Electric Vehicles.	A042		The Development Management guidelines in Section 16.10.12 of the current County Development Plan regarding facilities for electric vehicles will be reviewed and updated as appropriate and carried forward into the new Plan.
iv) Submission requests the revision of development standards to include a specific car parking standard of 1:14 for 'retail-food' along public transport corridors, and an acknowledgement that car parking requirements for 'drive through' restaurants are different from other forms of retail activity. This should be reflected in planning policy.	A055		The current County Development Plan maximum car parking standards for non-residential developments contained in Table 16.4 will be reviewed and updated as appropriate.
v) Submission advocates the provision of a Harbour related car park within the re-development of St. Michael's to offset the removal of on-street parking within the Harbour	A099	3	This is not a strategic County Development Plan issue but a Development Management issue. To be addressed by the Council in conjunction with the Dún Laoghaire Harbour Company.

Key Issue Section 1: Sustainable Communities Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
area.			
vi) Submission recommends that all non-residential development proposals in the Greater Dublin Area (GDA) should be subject to maximum parking standards and should vary spatially on the basis of (i) centrality and (ii) the level of public transport provision. The Submission also recommends that, in locations where the highest intensity of development occurs, a considered approach that caps car parking on a more comprehensive area-wide basis should be considered.	A108		The contents of this submission are noted and will be considered during the preparation of the Draft Plan. The current County Development Plan maximum car parking standards for non-residential developments contained in Table 16.4 will be reviewed and updated as appropriate.
1.2.13 Parking General			
i) Submissions recommend that: <ul style="list-style-type: none"> the Council engage with residential communities regarding pay parking and promote a zonal approach to pay parking. 	A008 A014		The Council will engage with local communities regarding pay parking in accordance with the Parking Control Bye-laws and the Guidelines for the Implementation of Pay and Display Parking Control Schemes.
ii) A number of submissions were received relating to parking in general, or in specific areas. Requests were received: for the provision of additional parking/set down areas and / or changes to pay parking pricing structure in	A033 A046 A051 A069 A071 A073		Current County Development Plan Policy T7 relating to Park and Ride and Policy T17 relating to Control of On-Street Parking and will be reviewed and updated as appropriate and carried forward into the Draft Plan. Regarding Foxrock Village, a Part 8 was approved in 2013 for the provision of a car park totaling 51 spaces. This development will address car parking difficulties in the village.

Key Issue Section 1: Sustainable Communities Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
<ul style="list-style-type: none"> • Foxrock area • Dún Laoghaire • Windy Arbour Luas Station • Hollypark / Foxrock Avenue • Cornelscourt Village. <p>Submissions also detail concerns relating to commuter parking in residential areas including</p> <ul style="list-style-type: none"> • St. Columbanus Estate/Road Dundrum, • Dún Laoghaire • Quinn's Road East. <p>One submission advocates the establishment of IT systems to improve the parking situation (Dún Laoghaire).</p>	A085 A095 A099 A105 A118		<p>Requests for paid parking schemes on individual roads or specific estates are clearly operational matters and are not considered appropriate in the context of a strategic County Development Plan. Provision for paid parking schemes in residential areas is governed by the Parking Control Bye-laws and the Guidelines for the Implementation of Pay and Display Parking Control Schemes.</p> <p>Similar to above, the establishment of an IT based car parking system is clearly an operational matter and is not considered appropriate in the context of the County Development Plan.</p>
iii) Submission states that car parking fees at Shankill DART station are perceived as being too expensive.	A051	10	Parking fees are an operational issue to be decided by the Council. This issue is not considered appropriate in the context of a strategic County Development Plan.
iv) Submissions perceive parking fees as expensive, punitive, anti-car, primarily revenue generating in purpose, inflexible and a deterrent to visitors/shoppers both in Dún Laoghaire and the wider County as a whole.	A032 A073 A101	3	Parking fees are an operational issue to be decided by the Council. This issue is not considered appropriate in the context of a strategic County Development Plan. Nevertheless, it should be noted that car parking charges in Dún Laoghaire and the wider environs were reduced in March 2014 and other initiatives not based on cost are also being considered.
v) Submission requested car parking at all public transport termini (with covered walkways).	A073		The contents of this submission are noted and will be considered during the preparation of the Draft Plan.
vi) Submission supports the provision of a multi-story car park at St. Michael's Hospital.	A099	3	This is not a strategic County Development Plan matter but a Development Management issue. To be pursued with the Hospital authorities.

Key Issue Section 1: Sustainable Communities Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
vii) Submission requests the Council to be proactive in the provision of car parks that are open 7 days per week for non-commuter/recreational users.	A117		The contents of this submission are noted and will be considered during the preparation of the Draft Plan.
1.2.14 Road Objectives			
i) Submission requests various roads projects within and in close proximity to the Cherrywood SDZ Scheme lands namely: <ul style="list-style-type: none"> • the inclusion of the Kiltiernan Link Road and M50 Overbridge • Grand Parade Vehicular Road • Junction 16 underpass <p>be incorporated into the new Development Plan.</p>	A043	7 9 10	The contents of this submission are noted and will be considered during the preparation of the Draft Plan. It should be noted that the large scale infrastructural projects such as Long-Term and 6-Year Road Schemes as adopted within the Cherrywood SDZ Planning Scheme will be incorporated within both the narrative and the mapping for the County Development Plan.
ii) Submission requests the inclusion of an objective to provide for and safeguard lands for the proposed link road across the N11, as provided for in the NRA M50/M11/N11 Corridor Study.	A009	10 14	The contents of this submission are noted and will be considered during the preparation of the Draft Plan.
iii) Submission recommends that all new roads objectives must be discontinued.	A017		The contents of this submission are noted and will be considered during the preparation of the Draft Plan.
iv) Submissions expressed concern over the urban appearance of new roundabouts and roads in the Rathmichael area.	A020 A025 A026	9 10 13	The detailed specification of the surfacing of roundabouts in the Rathmichael area is an operational / maintenance issue not a strategic matter for consideration in a County Development Plan.

Key Issue Section 1: Sustainable Communities Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
	A028 A064 A098		
v) Submissions relating to the M50 including support for widening the M50. Attenuation of surface water run-off from the M50 to prevent downstream flooding at Shanganagh and Bayview.	A025 A026	5 6 9 10 14	In the longer term, sections of the M50/M11 may be widened by the addition of a third lane with an additional auxiliary lane where required. Attenuation of surface water runoff is now standard on motorway schemes.
vi) Submissions expressed support for the Eastern Bypass.	A038 A073	1 2 5 6	The Dublin Eastern By-pass is not recommended for development during the period of the NTA Draft Transport Strategy for The Greater Dublin Area 2011-2030. However it is recommended that the Eastern By-pass route corridor be protected for a possible future transport scheme that may be implemented after 2030.
vii) Submission requests various road projects / improvement works are incorporated in the new Plan, namely: <ul style="list-style-type: none"> • Widening of the lanes on the Wilford Roundabout • Widening and improvement of Dundrum Road towards Milltown and junction improvements at Dundrum Cross • Provision of a south bound slip road from the Sandyford Business District to the M50 • Tivoli Road • Re-instatement of the roundabout at junction of Glenageary Road and Mounttown Road. 	A013 A051 A066 A074 A085	3 5 6 14	The contents of this submission are noted and will be considered during the preparation of the Draft Plan.

Key Issue Section 1: Sustainable Communities Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
viii) Submission requests the removal of the a section of the Eastern Bypass – Goatstown Interchange)	A091	1 2 5 6	The Dublin Eastern By-pass is not recommended for development during the period of the NTA Draft Transport Strategy for The Greater Dublin Area 2011-2030. However it is recommended that the Eastern Bypass route corridor be protected for a possible future transport scheme that may be implemented after 2030.
1.2.15 Section 48 and 49 Levies			
i) Submission requests that the Section 49 levy scheme be reviewed for the Glenamuck Distributor Roads.	A012	9 13	The contents of the submission are noted. It is the intention of the Council to review the Section 49 Supplementary Development Contribution Scheme for Kiltiernan.
ii) Submission recommends that Section 48 levies should not be requested in lieu of off-street car parking in town centres to counteract vacancy and revitalise town centres.	A017		<p>Under Section 48, of the Planning and Development Acts planning authorities must draw up a development contribution scheme in respect of public infrastructure and facilities provided by, or on behalf of the local authority that benefit development in the area.</p> <p>A comprehensive consultation process for the adoption of a development contribution scheme is provided for in section 48 (4)-(9) the Act. The making of such a development contribution scheme is a reserved function of the Elected Members and therefore is not considered appropriate in the context of a County Development Plan.</p>
iii) Submission requests that provision of infrastructure beyond the limits of an SDZ boundary (Cherrywood) should be identified in the plan and provision made to fund these projects via section 48 and section 49 levies.	A043	7 9 10	<p>Section 49 of the Planning and Development Acts, enables a Planning Authority when granting planning permission pursuant to Section 34 of the Act to attach a condition to a planning permission requiring payment of a financial contribution in respect of any public infrastructure service or project.</p> <p>Subsection 1 of Section 49 specifies that the project or service shall be specified in a Supplementary Development Contribution Scheme (SDCS) made by the Planning Authority.</p>

Key Issue Section 1: Sustainable Communities Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
			The making of such a SDCS is a reserved function of the Elected Members and therefore it is not considered appropriate in the context of a County Development Plan.
1.2.16 Electric Vehicles			
i) Submissions supportive of Electric Vehicles.	A038 A042 A073 A112		Current County Development Plan policy T10 and the Development Management requirements of Section 16.10.12 in relation to electric vehicles to be updated as appropriate and carried forward into the Draft Plan.
ii) Submission raised concerns in relation to the lack of recognition in relation to electric cars within the 'Have Your Say' document.	A038		The 'Have Your Say' document was never intended to be an all encompassing publication. Its intention was to stimulate debate on current strategic planning and development matters. All inputs related to the development of Electric Vehicles is however warmly welcomed and would be wholly consistent with the philosophy underpinning 'Sustainable Travel and Transportation'.
iii) Submission recommends that transportation policy objectives should reflect overarching EU and National policy objectives that place Electric Vehicles central to plans for zero carbon emissions systems.	A042		All EU and National policy objectives will be taken into consideration during the preparation of the Draft Plan.
iv) Submission recommends that planning should take account of future provision of appropriate facilities for electric vehicles.	A073		Current County Development Plan policy T10 and the Development Management requirements of Section 16.10.12 in relation to electric vehicles to be updated as appropriate and carried forward into the Draft Plan.

Key Issue Section 1: Sustainable Communities Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
v) Submission seeks the promotion of electric/hybrid vehicles and change current bus fleet to greener forms of transport.	A112		Current County Development Plan policy T10 and the Development Management requirements of Section 16.10.12 in relation to electric vehicles to be updated as appropriate and carried forward into the Draft Plan.
1.2.17 Miscellaneous			
i) Submission requests a Mobility Management Plan be implemented in relation to the bowling and tennis club on Quinn's Road East. Maintain / repair all roads in Shankill.	A051 A058	10	These issues relate to operational / maintenance matters and are not considered appropriate in the context of a strategic County Development Plan.
ii) Submission suggests connecting tourist sites to the main street in Dún Laoghaire via covered walkways/San Francisco style cable cars/moving walkways.	A095	3	It is considered that this proposal is not strategic but is local and should be examined properly in the context of any future process for considering and formulating an overall strategy and vision for the Dún Laoghaire Town Centre and Environs area.
iii) Submission details the NTA functions within the preparation of a Development Plan as including: <ul style="list-style-type: none"> • transport investment priorities • maximizing the performance of the transport system by effective land-use planning • Recommendations regarding the optimal use, location, pattern and density of development taking account of its Transport Strategy. 	A108		The contents of this submission have been noted.

SECTION 2

ENTERPRISE AND EMPLOYMENT STRATEGY

Key Issue Section 2: Enterprise and Employment Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
2.1 Enterprise and Employment			
2.1.1 Shankill			
<p>i) This submission from Corbawn Residents Association, Shankill, refers to the redevelopment of Shankill Shopping Centre being an economic catalyst for the area.</p> <p>Small incubation units should be set up in Shankill with no rates.</p>	A058	10	<p>It is acknowledged that the successful redevelopment of the Shopping Centre in Shankill will both provide a much needed retail offer in the Village and provide local employment and this is welcomed.</p> <p>In relation to incubator units, Policy E9: Enterprise Incubator Units included in the existing County Development Plan states that <i>"It is Council policy to assist in the provision of Enterprise Centres in association with other agencies and in the context of local need"</i> and that <i>"The availability of adequate incubator space for enterprises in the early stages of development should be part of the enterprise infrastructure in Dún Laoghaire-Rathdown"</i>.</p> <p>Support systems for small enterprise are provided by a range of State agencies and the policy indicates that the Council will liaise with the public sector enterprise support agencies, with voluntary community development groups and with business organisations in Dún Laoghaire-Rathdown to facilitate the provision of suitable premises for such enterprises.</p>
2.1.2 Sandyford			
<p>i) Submission from Sandyford Business District Association requests that Sandyford should be designated to reflect its primary role as a key business district in the County. The growth &</p>	A074	6	<p>The contents of this submission have been noted. The Sandyford Business District represents the single largest concentration of employment in the County, with over 15,000 persons employed in the area. As such, it is a critically important area of focus for the Council and is reflected in the policy of the Sandyford Urban Framework Plan which seeks to <i>"promote and</i></p>

Key Issue Section 2: Enterprise and Employment Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
development of Sandyford should be nurtured and promoted.			<i>facilitate employment growth in Sandyford Business District recognising its status as a primary growth centre in the Economic Development Strategy of the Regional Planning Guidelines 2010-2022".</i>
ii) Submission calls for the redevelopment of existing 'tired' areas rather than rezone new employment lands. County Development Plan policy should reward entrepreneurs/startups.	A112		<p>Given the sizeable quantum of undeveloped zoned employment lands and the range of existing, unimplemented planning permissions for redevelopment of brownfield employment lands in areas like Sandyford, it is difficult to see, at this juncture a strong evidence-based case emerging to support the rezoning of additional employment lands. This issue will be explored in depth in the Core Strategy of the Draft County Development Plan.</p> <p>The recent establishment of the 'Local Enterprise Office' as part of the Local Authority, will bring a coordinated approach to the delivery of services to start-up companies - including Business Advice Clinics, Business Mentoring, Small Business Training Courses, Management Development Programmes, Financial Supports and Enterprise Education Initiatives.</p>
2.1.3 Employment Zoned Lands			
i) Submission from Regional Planning Guidelines Office recognises that employment zoned lands are limited and much employment takes place in lands not zoned 'E'. Core strategy should assess location of current employment, employment trends typology and demands in assessing land use requirements.	A007		The contents of this submission have been noted. As stated above, the Core Strategy of the Draft Plan will include a detailed analysis of the existing employment/enterprise landbank and future requirements having regard to population growth forecasts and other considerations such as job ratio, labour force participation rates and likely 'employment density' in new development areas.
2.1.4 Miscellaneous			
i) Employment spin-offs from harbour /sailing	A016	3	It is considered that such a proposal can be further explored during any future process for

Key Issue Section 2: Enterprise and Employment Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
activities – Council should develop a 'Local Economic & Community Plan' for the Harbour itself.			considering and formulating an overall strategy and vision for the Dún Laoghaire Town Centre and Environs area and also examined during the preparation of the Draft Plan. A 'standalone' Local Economic and Community Plan (LECP) for the entire County is to commence preparation in the very near future.
ii) Wide ranging submission from An Taisce <ul style="list-style-type: none"> • Prudent to plan for different scenarios – low growth/no growth/ contraction • Locality is important – local markets for local produce • Promote local farmers markets • County Development Plan should include an Employment Land Survey to inform quantum and location of any additional zoned lands • Small scale local commercial zones should be promoted rather than large scale industrial/warehouse parks. 	A017		<p>As stated above, the Draft County Development Plan Core Strategy will include a detailed analysis of existing employment/enterprise lands and will make recommendations regarding future requirements. In relation to planning for different growth scenarios, the County Development Plan population growth forecasts are part of a wider regional scenario – the assumptions that inform population forecasting and targeting involve not just demographic factors but issues such as economic growth and migration trends.</p> <p>It is considered that the 'CoCo Markets' Council-run farmers markets programme is a successful and popular feature of the public park programme of events and positively discriminates in favour of locally sourced and produced goods.</p> <p>In relation to the proposal that small-scale local commercial zones should be promoted rather than large scale industrial/warehouse parks. The Planning Authority see significant benefit in facilitating through land use zoning the clustering of high-intensity employment land uses proximate to high quality public transport corridors. In any event, the commercial zones in the County vary quite significantly in scale, with a significant amount of employment being located <u>outside</u> of the large commercial cores such as Sandyford.</p>
iii) Submission from UCD states that the University is a major economic contributor to the County, with a current population c.26k. UCD plans to review its Masterplan - to be published 2015 and looks forward to working with the Council through the County Development Plan process.	A037	1/2	The contents of this submission have been noted. The Planning Authority will continue to work closely with UCD as part of the County Development Plan process reflecting not only the importance of the University both as the largest single employer in the County, but also as the largest third level institution in the State.

Key Issue Section 2: Enterprise and Employment Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
<p>iv) Submission from Dún Laoghaire Business Improvement District 'BID' committee states that larger retail and office units are required in Dún Laoghaire. Also, that a link should be created between IADT and Dún Laoghaire.</p> <p>It is also stated that the role of Dún Laoghaire as an educational centre should be expanded (at all levels).</p> <p>It is stated that there is 'real tourist potential' in the Town and some enhancements are suggested – a walkway travelator to improve access from the coast to Georges St./new tourist accommodation/upgrading of Haigh Terrace.</p>	<p>A095</p>	<p>3</p>	<p>It is considered that these proposals have merit and can be examined during any future process for considering and formulating an overall strategy and vision for the Dún Laoghaire Town Centre and Environs area and also examined during the preparation of the Draft Plan.</p>
<p>v) Submission refers to the Dún Laoghaire Community Enterprise Centre located at the Old Fire Station. There are 16 business incubation units operated on a self financing/nom-profit basis.</p> <p>Maintenance is expensive/difficult and new premises required. The County Development Plan should support this initiative. Should have facilities for craft food producers (high growth area). Foster close links with IADT.</p>	<p>A111</p>	<p>3</p>	<p>The County Development Plan Review process offers the opportunity to review policy on a County-wide basis in relation to business incubation units. The current Development Plan states that <i>"The availability of adequate incubator space for enterprises in the early stages of development should be part of the enterprise infrastructure in Dún Laoghaire-Rathdown"</i>. It is anticipated that the new Plan will expand upon this initiative in conjunction with the Local Enterprise Office.</p>

Key Issue Section 2: Enterprise and Employment Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
2.2 Retailing			
2.2.1 Retail Hierarchy			
i) Submission requests that retail policies and retail development within the County should support the policies and recommendations of the Retail Strategy for the Greater Dublin Area (GDA) contained in the Regional Planning Guidelines. The Retail Strategy for the County is aligned with the hierarchy for the GDA, with the exception of Carrickmines, which is not a District Centre in the GDA Strategy. Submission also recommends that other retail nodes in the County, but not yet included in the RPG retail hierarchy, should also be addressed.	A007	9	Examine the possible reclassification within the retail hierarchy of Carrickmines and other relevant retail nodes during the preparation of the Draft Plan.
ii) Submission indicates that the Development Plan can, and should, provide flexibility in zoning sites for retail development. It also needs to provide options for retailers in centres whose retail format cannot be accommodated within a tight urban grain.	A055		It is considered that the current Retail Hierarchy in the existing County Development Plan is well established and provides sufficient flexibility in sites zoned for retail development. It is envisaged that this approach will be continued in the preparation of the Draft Plan.
iii) Submission requests that any proposals for comparison retailing provision in Cornelscourt should meet the needs of the local community and	A069	6	Policy RET7 of the existing County Development Plan already advocates this approach to the development of Neighbourhood Centres and it is envisaged that this approach will be continued into the Draft Plan.

Key Issue Section 2: Enterprise and Employment Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
be consistent with the Neighbourhood Centre status of the village.			
iv) This submission seeks to promote the benefits of community-based retail policy. It recommends that the following issues be considered for the Town, District and Neighbourhood Centres across the County: <ul style="list-style-type: none"> • Improved public realm at the centres • Reduced vacancy levels • Continue to endorse the sequential approach and adhere to the retail hierarchy • Continued accessibility to retail centres • Support local facilities in existing neighbourhood centres • Incorporate the objectives of the Retail Planning Guidelines 2012 as specific retail policies in the County Development Plan • The Council should assist in resolving impediments to town centre redevelopment opportunities 	A115		It is considered that the existing County Development Plan already currently promotes and advocates such a package of objectives but this can be further examined during the preparation of the Draft Plan. The objectives of the Retail Planning Guidelines for Planning Authorities 2012 are already considered an integral component of the preparation of the Retail Section of the Draft Plan.
2.2.2 Carrickmines District Centre			
i) Submission indicates that the designation of Carrickmines as a District Centre is not inconsistent with the Greater Dublin Area Retail Strategy 2008, as Carrickmines could not have been listed in the aforementioned strategy as it was adopted in 2008 and the Carrickmines designation was adopted in	A009 A087	9	During the preparation of the Draft Plan the Council will examine the existing retail hierarchy for the County to assess its alignment with the Retail Strategy for the Greater Dublin Area 2008-2016 and the Regional Planning Guidelines 2010-2022. An Bord Pleanála refused planning permission for the development of the District Centre at Carrickmines, under planning application D12A/0163. The reasons for refusal indicated that the

Key Issue Section 2: Enterprise and Employment Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
<p>2010.</p> <p>The designation of Carrickmines as a District Centre is fully consistent with the policy recommendations of the GDA Retail Strategy 2008 and the Regional Planning Guidelines 2010-2022 and it accords with the principles of sustainable development.</p>			<p>proposed development would conflict with the Retail Hierarchy for the Greater Dublin Area as set out in the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 and the Retail Strategy for the Greater Dublin Area 2008-2016, neither of which identifies Carrickmines as a Level 3 District Centre. The proposed development would also undermine the Retail Hierarchy for the Greater Dublin Area and the designated role of Dún Laoghaire and Dundrum as Level 2 Town Centres to serve the needs of the County. The Bord also considered that the proposed development would generate a high level of car dependency and this outcome would be contrary to national and local transportation policy, as set out in, 'Smarter Travel – A Sustainable Transport Future 2009-2020' and Policy T2 of the Dún Laoghaire-Rathdown Development Plan 2010-2016.</p> <p>It should be noted that the preparation of the Draft Plan is taking place in a vacuum of up-to-date information in terms of guidance from the new Eastern and Midlands Regional Assembly, formerly the Regional Planning Authority. The Greater Dublin Area Retail Strategy dates back to 2008 and was formulated using 2006 Census data at a time when a very different economic environment prevailed. Despite recommendations that the GDA Retail Strategy would be reviewed and undated regularly every two years to respond to changing economic circumstances, the strategy has not been revised or updated since its publication in 2008. The prospect of receiving any new guidance in relation to a new Retail Strategy for the Greater Dublin Area before the new Development Plan is adopted appears very unlikely.</p>
<p>2.2.3 Cherrywood SDZ</p>			
<p>i) Submission requests that the County Development Review will now need to include Cherrywood Town Centre within the retail hierarchy for the entire County. The designation of Carrickmines as a District Centre is flawed and needs to be addressed.</p>	<p>A043</p>	<p>7 9 10</p>	<p>The retail hierarchy for the County will be reviewed during the preparation of the Draft Plan.</p> <p>The issue of the District Centre at Carrickmines has been addressed at 2.2.2 above.</p> <p>The current County Development Plan and the Retail Planning Guidelines 2012 both adopt a</p>

Key Issue Section 2: Enterprise and Employment Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
The prohibition of Retail Warehousing in Cherrywood needs to be addressed.			cautionary approach to retail warehousing. With regard to Cherrywood this issue was already comprehensively examined during the statutory SDZ process.
2.2.4 Sandyford Urban Framework Plan			
i) Submission expresses concern that its current designation as a "Neighbourhood Centre" is restrictive and inappropriate. Would support the redesignation of the area to a "District Centre" zoning designation so as to avail of opportunities that may arise in the coming years.	A074	6	Examine the possible reclassification within the retail hierarchy of the Sandyford Business Estate during the preparation of the Draft Plan.
2.2.5 Stillorgan District Centre			
<p>i) Submission supports the policies relating to the District Centre in Stillorgan and requests that these be retained in the 2016-2022 County Development Plan.</p> <p>The Retail Planning Guidelines for Local Authorities do not advocate a floorspace cap for District Centres.</p> <p>The new County Development Plan should incorporate an objective to review the existing Stillorgan Local Area Plan in the short term to take account of the significant change in circumstances.</p>	A082	2	<p>The floorspace cap for the Stillorgan District Centre is consistent with the guidance provided by the Retail Strategy for the Greater Dublin Area 2008-2016.</p> <p>The Retail Planning Guidelines for Planning Authorities are National guidelines but are silent on the issue of floorspace limitations for District Centres The Guidelines do state that District Centres should not serve as a retail destination in their own right sufficient to adversely impact on the Town Centre to which they are subservient and in this regard the existing floorspace cap in place at Stillorgan is considered appropriate.</p> <p>The lifetime of the Stillorgan Local Area Plan was extended in 2012 for an additional five-year period up to 2017. The existing plan may need to be reconsidered at some future date.</p>

Key Issue Section 2: Enterprise and Employment Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
2.2.6 Nutgrove District Centre			
i) Submission supports the policies relating to the District Centre in Nutgrove and requests that these be retained in the 2016-2022 County Development Plan. The imposition of a floorspace cap at Nutgrove and other District Centre' in the County is not consistent with the Retail Planning Guidelines for Local Authorities and should be reconsidered.	A086	1	<p>The floorspace cap for the Nutgrove District Centre is consistent with the guidance provided by the Retail Strategy for the Greater Dublin Area 2008-2016.</p> <p>The Retail Planning Guidelines for Planning Authorities are national guidelines but are remarkably silent on the issue of floorspace limitations for District Centres. The Guidelines do state that District Centres should not serve as a retail destination in their own right sufficient to adversely impact on the Town Centre to which they are subservient and in this regard the existing floorspace cap in place at Nutgrove is considered appropriate.</p>
2.2.7 Blackrock District Centre			
i) Submission refers to the current proposals to increase the size of Frascati Shopping Centre and indicates that there is plenty of shopping in Blackrock – it is a village not a town or city. Also indicates that the Frascati Shopping Centre should not develop up to the busy Frascati Road.	A092	2	<p>Any proposals to increase the size and scale of the Frascati Shopping Centre shall be considered having regard to the policies and objectives of the current County Development and the Draft Blackrock Local Area Plan 2014, once prepared. The scale of retailing in Blackrock District Centre is currently capped in the County Development Plan at 25,000sqm net retail floor space. Any proposals for additional retail floor space in any redevelopment of the Frascati Shopping Centre will require to be considered having regard to its proportionate share of the remaining available retail floor space for the entire District Centre.</p> <p>Any redevelopment of the Frascati Shopping Centre shall, in the interests of good urban design, provide an active and interesting street frontage, whilst respecting the nature and function of the road along its frontage and pedestrian safety.</p>

Key Issue Section 2: Enterprise and Employment Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
2.3 Major Town Centres			
2.3.1 Dún Laoghaire			
i) Submission proposes that Dún Laoghaire should market its Irishness like Dingle.	A015	3	This proposal is not considered a strategic County Development Plan issue but could be explored further during any future process for considering and formulating an overall strategy and vision for the Dún Laoghaire Town Centre and Environs area.
ii) Submission requests that the cost of car parking in Dún Laoghaire be reduced to encourage shoppers to use the local shops and to stop the commercial decline in the Town Centre.	A033	3	The issue of parking fees is an operational matter and not one for consideration as part of the strategic County Development Plan process. Nevertheless it should be noted car parking charges in Dún Laoghaire were reduced in March 2014 and other initiatives not based on cost are also being considered.
iii) Submission requests that a specialist retail role for Dún Laoghaire be pursued within the Local Area Plan process.	A047	3	This issue is considered to have merit and will be considered during any future process for considering and formulating an overall strategy and vision for the Dún Laoghaire Town Centre and Environs area.
iv) Submission requests that the lands adjoining Haigh Terrace at the Royal Marine Hotel in Dún Laoghaire should be designated to provide a more animated frontage and an appropriate mix of commercial uses to encourage tourism.	A070	3	It is considered the current zoning of the site to allow for "Major Town Centre uses" is sufficient to enable these proposals to be achieved.
v) Submission indicates that Dún Laoghaire can be reinvented by: <ul style="list-style-type: none"> • the provision of a new town square • providing larger retail and office units 	A095	3	It is considered that many of these proposals have merit and can be explored further during any future process for considering and formulating an overall strategy and vision for the Dún Laoghaire Town Centre and Environs area and during the preparation of the Draft Plan.

Key Issue Section 2: Enterprise and Employment Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
<ul style="list-style-type: none"> • becoming an age friendly town • improved IT systems • increasing the number of parking spaces • creating a link between the IADT campus and Dún Laoghaire town and expanding Dún Laoghaire's role as an educational centre. <p>This submission also indicates that instead of downsizing the Major Town Centre zoning in Dún Laoghaire, this zoning should be expanded and the strategy should be to double the resident population in the BID area of the town.</p>			<p>The proposal to provide a larger Major Town Centre zoning in Dún Laoghaire cannot be considered at this stage of the Development Plan process. In any event it is not considered a tenable proposition. The size and scale of the current Major Town Centre zoning is sprawling. It extends from the Peoples Park westwards to the Dún Laoghaire Further Education Institute on Cumberland Street and from Crofton Road southwards to the top of Patrick Street.</p> <p>This issue will be explored further during any future process for considering and formulating an overall strategy and vision for the Dún Laoghaire Town Centre and Environs area and during the preparation of the Draft Plan. The Major Town Centre zoning may benefit from a more refined commercial/retail zoning or alternative zoning objectives such as primary and secondary cores in the town, given that the Major Town Centre zoning performs other functions in addition to retailing.</p> <p>The Council fully supports any proposals aimed at increasing the resident population in the Town Centre. There has been recent residential development activity in the Town Centre with the provision of 25 apartments at Georges Court in Georges Place.</p>
<p>vi) Submission requests that the Draft Plan specifically promotes the development of multiple units for specialist goods for the tourist market in the Harbour area.</p>	A099	3	<p>The contents of this submission are noted and will be considered during the preparation of the Draft Plan.</p>
<p>vii) Submission states that urgent action is needed to halt the decline of Dún Laoghaire with over 100 empty shops in the town.</p>	A104	3	<p>The decline of the town centre is not unique to Dún Laoghaire and has occurred throughout the Country during the recession.</p> <p>The loss of retailing can be attributed primarily to the downturn in the economy but also to a range of other factors - some demographic, such as the pronounced population decline in the immediate catchment of the Town Centre over the last 20 years, and some physical, such as the fragmented and often unclear land ownership patterns and the unwieldy, elongated nature of George's Street itself.</p>

Key Issue Section 2: Enterprise and Employment Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
			Other issues include the relative scarcity of large-floorplate retail outlets in the town and the lack of availability of many of the top performing clothing brands, which can act as a significant 'pull factor' in attracting footfall. These issues will be examined during the preparation of any future process for considering and formulating an overall strategy and vision for the Dún Laoghaire Town Centre and Environs area and the Draft Plan process.
2.3.2 Dundrum			
<p>i) Submission seeks,</p> <ul style="list-style-type: none"> • The reaffirmation of Dundrum as a 'Major Town Centre' • support in policy terms of proper use of scarce land and higher density development • recognition of the scale and significance for the planning and development of 'Major Town Centres' • recognition in the Development Plan of the role of Dundrum as a retail centre of national and international significance and provide support for the ongoing development of the Town Centre • revisions to the Dundrum Urban Structure Plan <p>This submission also requests the extension of the 'Major Town Centre' zoning.</p>	A066	3/1/5	<p>The contents of this submission are noted and will be considered during the preparation of the Draft Plan.</p> <p>The proposal seeking an extension to the 'Major Town Centre' zoning cannot be considered at this stage of the Development Plan process.</p>

SECTION 3
GREEN INFRASTRUCTURE STRATEGY

Key Issue Section 3: Green Infrastructure Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
3.1 Landscape, Biodiversity & Natural Heritage			
3.1.1 General			
i) Submission requests Development Plan policies should be informed and shaped by environmental directives.	A007		Development Plan policies will be informed and shaped by Environmental Directives.
ii) Consider promoting local heritage sites such as Puck's Castle, Lead Mines and Shanganagh Castle.	A051	9 10 13 14	The key messages of the second Dún Laoghaire-Rathdown Heritage Plan "DLR heritage Plan 2013 – 2019" are to communicate the story of the County's heritage, to care for the environment and to increase levels of community involvement in heritage. Work on implementing the plan will include promotion of heritage sites in the County.
iii) Submission suggests that Heritage and Biodiversity should have a Chapter of their own (separate from landscape).	A117		This will be examined further during the preparation of the Draft Plan but it is considered that landscape is integral to both heritage and biodiversity.
iv) Submission suggests that in the existing Chapter 6 relating to the coast and the mountains should be subdivided.	A117		This proposal will be examined during the preparation of the Draft Plan.
v) Submission contains various policy suggestions based on other County Development Plans.	A117		Policies will be examined during the preparation of the Draft Plan. However, background work to date has already involved examination of other County Development Plans for best practice examples.
vi) Submission contains various suggestions relating to wording in the Draft Plan.	A117		The contents of this submission have been noted. These will be examined when drafting the Plan.
vii) Submission suggests inclusion of a policy relating	A117		The relevance of the policy to the upland areas of Dún Laoghaire-Rathdown will be critically

Key Issue Section 3: Green Infrastructure Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
to fencing in upland areas based on policy in the plans of Mayo, Sligo and Galway County Council.			examined during the preparation of the Draft Plan.
3.1.2 Designated sites			
i) Consider designating the area around Shanganagh Castle as a Special Area of Conservation.	A051	14	Special Areas of Conservation are not related to Built Heritage but are a natural heritage designation under EU Habitats Directive.
ii) Submission requests that the 'proposed Natural Heritage Area' status at Killiney Hill be changed to 'Natural Heritage Area'.	A096 A097	4 7	In relation to the changing of Killiney Hill, Roches Hill from a proposed Natural Heritage Area to Natural Heritage Area the area in question is one of 650 no. proposed NHAs in the Country. The Council does not have a role in the designation of pNHAs or NHAs. This National Parks and Wildlife Service are statutorily charged with responsibility in relation to identifying and designating Natural Heritage Areas.
iii) Submission requests that the agricultural and high amenity zoning currently shown in the Ballycorus Valley be retained and that the importance of farming be recognised.	A103	13	The Ballycorus area is identified as a specific Landscape Character Area in the Landscape Character Assessment of the County. This assessment recognises the sensitive landscape of the area and the need to maintain field patterns and boundaries along with the important role of mining in the area in the past. The north-western portion of this area as identified in the Landscape Character Assessment has however been adulterated as development in accordance with the Kiltiernan Glenamuck Local Area Plan has advanced.
iv) Submission suggests the inclusion of a policy in relation to World Heritage Sites.	A117		No potential World Heritage Site has been identified in DLR nor are there any sites on any tentative list.
v) Submission seeks designation of a SAAO for Killiney Hill. Seeks a feasibility study to report within one year of the adoption of the Plan on other areas worthy of designation.	A117	4 7	A very large proportion of the area of Killiney Hill, Dalkey Hill and Roches and Mullins Hill is actually in the ownership of, and maintained by, the County Council. The Parks Department published a draft Roches Hill Management Plan 2013 - 2017 in October 2012. The Draft Management Plan sets out a series of specific management proposals for Roches Hill that would not be dissimilar to the type of objectives that would be included in a SAAO.

Key Issue Section 3: Green Infrastructure Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
			<p>Kiliney Hill / Dalkey Quarry is managed similarly and the Parks Department aspires to developing a similar Draft Management Plan for this site. However, due to limitations on resources, this is unlikely to be published in 2014.</p> <p>Given that the lands in question are effectively in Council control and that Management Plans and proposals for the sites are being introduced the preparation of an SAAO would represent unnecessary duplication.</p>
vi) Submission suggests that the Plan should include a policy relating to Dalkey Island.	A117	4	Any policy impacting on Dalkey Island should be based on the recently published Dalkey Islands Conservation Plan 2014-2024.
3.1.3 Biodiversity			
i) Plan should encourage the growth of salt marshes and sand dunes along the fragile lengths of the County's coastline.	A015		Much of the coastal area in the County adjoins the built-up area. However the County does contain one significant and important marsh at Booterstown.
ii) Large areas of forestry over the mountains are destroying the bogs. The bog could be artificially reconstituted by filling in the forestry drainage ditches.	A015		Large areas of coniferous forestry in the County fall within the ownership, and are the responsibility of Coillte, not the County Council.
iii) Submission recommends that the Plan include a Natural Heritage section listing Designated Sites, taking into account Appropriate Assessment, Biodiversity Convention, Ramsar Convention, Birds and Habitats Directive, Wildlife Acts.	A017		The existing County Development Plan contains a robust set of policies and objectives relating to the protection of the environment, biodiversity, waterways and both designated and undesignated sites. It is intended that the new plan will further strengthen this chapter having regard to changes in National and European environmental legislation. Policies will address issues including biodiversity corridors, connection of the County's green spaces, planting of trees and the development of wetlands and marshes.
iv) Submission recommends that the Plan should recognise undesignated sites and stepping-	A017		The Draft Plan will deal specifically with undesignated sites.

Key Issue Section 3: Green Infrastructure Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
stones.			
v) Submission recommends that the Plan should contain policies on invasive species, protection of hedgerows, waterways.	A017		The Draft Plan will deal specifically with invasive species, protection of hedgerows and waterways.
vi) Submission recommends that the Plan should incorporate the policy recommendations of the National Biodiversity Plan 2010 – 2015. A local Biodiversity Action Plan should be prepared.	A017		DLR have prepared a County Biodiversity Plan 2009 – 2013 which aims to translate international, European and Irish policies and obligations into effective local action on the ground.
vii) Submission recommends that the Council should develop biodiversity corridors to facilitate movement of species and connect up green belts and parks.	A045		The Green Infrastructure Strategy to be incorporated as a component part of the overall Development Plan will address biodiversity corridors.
viii) Submission recommends that the Plan should encourage the further planting of trees, including neighbourhood forests to offset CO ² emissions.	A045		The DLR Tree Strategy supports the further planting of trees.
ix) Submission suggests that small streams in Rathmichael could be enhanced to restore the natural flood plain and promote biodiversity by suitable planting.	A045	10 14	The contents of this submission have been noted.
x) Submission suggests that the Council should use art and nature exhibitions to teach people about the environment.	A112		The Environmental Awareness Office of Dún Laoghaire-Rathdown is highly engaged in giving talks and providing information to schools on environmental issues.
xi) Submission suggests that the Indicative Forestry Strategy be relocated into a new Chapter.	A117		This can be investigated when drafting the new Plan.

Key Issue Section 3: Green Infrastructure Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
3.1.4 Coastal Erosion			
i) Submission states that access to the beach at Corbawn Lane is dangerous.	A058	10	This is an operational/maintenance issue and not a strategic Development Plan issue. Council engineers have recently met with local residents on site.
ii) Submission states that the cliffs between Shanganagh and Quinn's Road have deteriorated dramatically and rapidly since 2010. Submission states that there has been a loss of cliff in front of Seafield. No work has been done to deal with this issue.	A051 A058	10	The Coastal Defence Strategy Study examined Seafield, but as the houses, public road, and services would not be at risk in the next 50 years, this area was not included on the priority list. As this area will be at risk in less than 70 years (current erosion rate of 0.23m/year), consultants have been requested to ascertain if there are any low cost remedial measures than can be taken to slow the rate of erosion along this section of cliff. As access to the beach in this area is extremely limited, there may be a cost benefit in undertaking some works in this area at the same time as the works to the adjacent access off Corbawn Lane. Council engineers have recently met with local residents on site to discuss matters further.
iii) Submission argues that a new coastal cycle route below the cliffs at Shanganagh could act as a barrier to the sea.	A058	10	The contents of this submission have been noted.

Key Issue Section 3: Green Infrastructure Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
3.1.5 Green Belt			
<p>i) Submission suggests that the Area West of the M11 south of Cherrywood should be protected as green belt thus avoiding the gradual amalgamation of Bray and Shankill.</p> <p>Submission suggests the maintenance of the green belt at Shankill between Quinn's Road and Shanganagh Park.</p> <p>Submission requests the protection of the green belt around Rathmichael</p>	A026 A051 A058 A106	10 14	<p>In the current County Development Plan there are areas which are zoned objective GB – To protect and enhance the open nature of lands between urban areas. These GB areas include large swathes of land to the west of the M11 at Rathmichael and Old Conna, areas to the east of the M11, south of Shanganagh Park and a small area to the north of Shanganagh Park. Policy LHB14 of the current plan is to retain this green belt area over the lifetime of the existing plan. In looking at this policy and the way forward over the life of the next plan a balance needs to be struck between the fact that land in the County is a finite resource, that there is considerable pressure to meet development needs and the need to protect the green belt.</p>
3.1.6 300 Foot Contour			
<p>i) Submission requests that the prohibition of building above the 300 foot contour should be reinstated thus ensuring protection of upland areas.</p>	A022 A025 A028 A030 A045 A106	10 14	<p>The County Development Plan 2010 – 2016 contains SLO No. 71 pertaining to Maps 10 and 14 which states that;</p> <p><i>"No insensitive or large scale development shall take place above the 90 metre contour line at Rathmichael, from old Connaught Golf Course to Pucks Castle Lane – maps 10 and 14. Any proposal for development, other than development directly related to agriculture, forestry recreation or the promotion of other bona fida rural enterprise or employment activity, shall be domestic in scale appearance and function."</i></p> <p>The wording of the SLO was changed from the 2004 – 2010 plan which stated "no development" and this change reflected that fact that there are certain sites zoned A (residential) above the 300 foot contour where infill development might be considered appropriate subject to the normal planning considerations. It does not make sense and is not practical to place a total prohibition on</p>

Key Issue Section 3: Green Infrastructure Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
			<p>development above the 90 metre/300 foot contour.</p> <p>It is considered that other upland areas are afforded adequate protection through the stringent zoning provisions of the County Development Plan and also by way of the policies in relation to development in upland areas. In accordance with the Department of the Environment, Heritage and Local Government 2005 "Sustainable Rural Housing, Guidelines for Planning Authorities" the Development Plan has a key role in providing policies in relation to rural housing. It is not considered necessary to have a blanket prohibition on building above the 90 metre contour insofar as the existing Development Plan policies ensure that any rural housing development in the high amenity zoning will not have negative effects on the area including visual prominence or impacts on views and prospects, or the natural and built heritage.</p>
3.1.7 Village Design Statement			
i) Submission requests that the Plan should include a policy on Village Design Statements.	A015 A017		Village Design Statements' (VDS) are an initiative of The Heritage Council. The VDS Programme seeks to provide <i>"an opportunity for meaningful public participation in the Irish planning system"</i> for local communities, with a particular emphasis placed on the conservation and management of local heritage. The inclusion of policies in relation to VDS and to the County Villages will be examined during the preparation of the Draft Plan.
3.1.8 Geological Heritage			
i) Submission provides information with regard to the geological heritage of the county.	A035		This information is welcome and will be used in the preparation of the Draft Plan.
ii) Submission suggests a series of policies regarding geological sites.	A117		A survey of the County's geological heritage is being carried out by the Heritage Office which will highlight important sites and make recommendations.

Key Issue Section 3: Green Infrastructure Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
3.1.9 S2S			
<p>i) Submissions request that the Plan should include S2S Sutton to Sandycove cycleway proposal.</p> <p>Submission requests that the S2S proposal should not be removed.</p> <p>General support for S2S project.</p>	A002 A033 A051 A058	2 3	<p>The proposed S2S Promenade and Cycleway forms part of the East Coast Trail within the Greater Dublin Area Cycle Network Plan. The full route of S2S straddles the administrative areas of Fingal, Dublin City and Dún Laoghaire-Rathdown.</p> <p>It should be noted that this coastal route will be subject to a feasibility study including an assessment of route options. Any development proposals shall be subject to Appropriate Assessment Screening in accordance with the requirements of the EU Habitats Directive to ensure the protection and preservation of all designated Special Protection Areas (SPAs), Special Areas of Conservation (SACs), and (proposed) Natural Heritage Areas (pNHAs) of Dublin Bay and surrounding areas.</p> <p>The National Transport Authority (NTA) has confirmed its intention to procure a specialist consultant to evaluate all options for the section of the route between Sandymount Strand and Booterstown Marsh. The study will be undertaken by the NTA with the active involvement of Dún Laoghaire-Rathdown and Dublin City.</p>
3.1.10 Landscape			
i) Submission considers broad-brush Landscape Character Area inappropriate. Each area should be capable of sustaining an appropriately situated quarry.	A005		It is considered that the Landscape Character Areas identified are not broad brush but relate to specific character areas in the rural portion of the County. Any proposal for quarries in these areas would be subject to the Development Management process and the relevant policies and objectives of the County Development Plan.
ii) Submission suggests review of Landscape Character Assessments.	A117		Landscape Character areas will be reviewed and updated as part of the Development Plan process.
iii) Submission suggests complete review of Historic	A117		Historic Landscape Character Assessments have been carried out in this County to support, and in

Key Issue Section 3: Green Infrastructure Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
Landscape Character Assessments.			conjunction with, Local Area Plans as they provide focused information for use in forward planning. Historic Assessments of all the character areas is a good idea in principle but the policy of prioritizing areas will continue.
iv) Submission requests that the Plan address the identification of Archaeological Landscapes and Identification of Landscape Conservation Areas.	A117		No change. Archaeological sites are already adequately dealt with under current designations.
3.1.11 Heritage			
i) Submission suggests including the main objectives of Heritage Plan in the County Development Plan.	A117		The main objectives of the Heritage Plan will be included in the Draft Plan.
3.1.12 Dublin Mountain Partnership			
i) Submission requests the promotion of Shankill as the beginning of the Dublin Mountain Way in order to provide spin-off economic benefits.	A058	10	In 2006 Dublin Mountains Partnership (DMP) was formed, comprising representatives from Coillte, South Dublin County Council, DLR, National Parks and Wildlife (NPWS) and the Dublin Mountains Initiative (DMI). The Dublin Mountains Partnership was established to oversee the preparation of a 10 year Strategic Plan for Development of Outdoor Recreation in the Dublin Mountains area. An examination of the map of the Dublin Mountains Way available on their website www.Dublinmountains.ie indicates that the Dublin Mountain Way already commences (and finishes) in Shankill.
ii) Submission requests that the Council should advertise and provide easy access and information on the available routes.	A112		The Dublin Mountains Partnership (DMP) already fulfills this role and DLR are involved in this initiative.

Key Issue Section 3: Green Infrastructure Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
3.2 Open Space, Recreation & Sports Development			
3.2.1 General			
i) Submission requests that: <ul style="list-style-type: none"> • Underused land be developed as additional playground and recreational facilities • Improvement and maintenance of parks and playgrounds is vital • Sports facilities must be supported 	A014		The Parks and Landscape Section of the Council have been very successful over recent years in developing and improving the existing parks and open spaces and will continue to do so subject to resources/funding.
ii) Submission seeks the continued support for recreational amenities, provide vandal proof bins and clean undergrowth of parks regularly.	A033		The forthcoming County Development Plan will continue to support recreational amenities. The other issues raised in this submission are operational matters.
iii) Submission requests the following: <ul style="list-style-type: none"> • Continue to invest in additional infrastructure and facilities • Amendments to the extension of the tennis club at Quinn's Road, Shankill • Amendments to the new small park at the front of the Dart station in Shankill • An audit of trees on Corbawn Lane and the Old Bray Road • Shanganagh Castle should be developed for community use and youth training; facilities within the castle such as the gym should be made available and an enhanced library 	A051 A058 A059	10	<p>The Parks and Landscape Section of the Council have been very successful over recent years in developing and improving recreational facilities and will continue to do as resources/funding permit.</p> <p>The requested amendments to the Tennis Club and the small park at the DART station in Shankill are outside the remit of the County Development Plan process as these schemes have already been approved by the Part 8 process.</p> <p>Trees at Corbawn Lane are protected by a Tree Preservation Order, one of only nine such designations in the County. In addition, groups of trees in this area are identified for protection on the existing County Development Plan maps.</p> <p>An audit of existing community facilities in the County will be undertaken during the preparation of</p>

Key Issue Section 3: Green Infrastructure Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
facility could be provided <ul style="list-style-type: none"> All social groups within the Shankill area should be facilitated by the provision of social centre (perhaps within the Castle). 			the Draft Plan. The results of this audit will identify deficits. These will be prioritised in the provision of facilities. A new community centre has been constructed and recently opened in Shankill at the Stonebridge Estate at a cost of 1.1 million Euro. The new facility features meeting rooms, a purpose-built childcare facility with a secure playground, a fully fitted computer room and office space.
iv) Submission requests an objective for large-scale tree planting programme focused on key centres.	A067		The existing County Development Plan in Section 10.2.6 states that the Council will plan for new planting to add to the urban forest. In addition the Council's has prepared a Tree Strategy for the County, DLR Trees 2011-2015. One of the objectives of the strategy is to plant more trees and Policy D2 is to promote urban tree planting. This strategy will be integrated into the Draft Plan.
v) Submission requests that the Council considers landscaping and semi mature planting in Cornelscourt.	A069	6	It is considered that these are operational matters and not strategic County Development Plan issues.
vi) Submission indicates that there is a need for community facilities within the St. Columbanus Estate. In recent years the sense of community has been lost in the area and youth facilities/clubs and green spaces within the estate have been lost resulting in limited play opportunities for local children. There were plans for a playground but this has not been progressed.	A071	1	The provision of a playground within the estate is an operational matter for the Parks and Landscape Services Section of the Council. An audit of existing community facilities in the County will be undertaken during the preparation of the Draft Plan. The results of this audit will be used in addressing obvious deficits in the provision of facilities in the County.
vii) Submission expresses concerns that sports/recreation facilities detailed through SLO 88 would be remote from Cherrywood and should be located on lands closest to Junction 16.	A088	10	The contents of this submission relates to issues already dealt with through the statutory SDZ process. The Cherrywood SDZ will be incorporated into the County Development Plan as adopted on the 29 th of April 2014. The SDZ process and subsequently adopted Plan stand-alone from the County Development Plan process and will not be altered.
viii) Submission refers to the open spaces proposed in the Dún Laoghaire Harbour Masterplan.	A099	3	The contents of this submission have been noted.

Key Issue Section 3: Green Infrastructure Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
ix) Submission requests that the development of the baths in Dún Laoghaire should include a public swimming pool.	A104 A113	3	The Council is well advanced in preparing a proposal for interim works at the Baths Site. These works include: <ul style="list-style-type: none"> • the renovation and re-opening of pavilion building to provide a public café/gallery, toilets, terrace area and artists studios • the creation of a new route with associated landscaping to connect the walkway at Newtownsmith to both the East Pier and the Peoples Park • enhanced facilities for swimming and improved access to the waters edge e.g. ramps, steps and renovation of the existing bandstand and • the creation of a small jetty in line with the existing structure and the provision of a changing area.
x) Submission indicates the following: <ul style="list-style-type: none"> • Existing open spaces should be improved while providing new open spaces as part of any new development • Larger parks should be priorities for concentrating recreational facilities but not to the detriment of existing users • A limited amount of commercial activity should be provided within Regional Parks in order to enhance their use but not reduce their appeal • There should be maintenance of walking trails and provision of exclusive cycle paths within and between existing parks • Generally there is sufficient open space, however, in some areas there is a dearth of open space • There may be a need to improve private and public open space standards depending on the expected population of a new development and open space should be provided where there is insufficient provision 	A112		The contents of this submission are noted and will be considered during the preparation of the Draft Plan.

Key Issue Section 3: Green Infrastructure Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
locally.			
3.2.2 Allotments and Community Gardens			
i) Submission requests that allotments and community gardens should be available across the County.	A008		<p>Policy OSR5 of the existing County Development Plan indicates that it is Council policy to support the development of public allotments and community gardens. There are a number of these facilities currently available in the County and the recently opened Shanganagh Community Garden is proving very successful.</p> <p>It is considered that this request has merit and will be examined during the preparation of the Draft Plan.</p>
ii) Submission requests that community allotments could be considered in public parks.	A014		<p>Activities associated with allotments such as parking, welfare facilities, carriage of tools, goods, plant material etc. do not generally fit well with a public park and could give rise to conflicts with other park users. Consequently the Council's preference is to explore other suitable locations.</p>
iii) Submission requests that suitable locations for allotments/community gardens be designated and that each new residential/mixed-use development should have an allotment space provided.	A017		<p>As discussed under submission A008 above, there are a number of these facilities currently available in the County. However it is considered that this request has some merit and the issues raised will be examined during the preparation of the Draft Plan.</p>
3.2.3 Green Infrastructure			
i) Submission welcomes the development of a Green Infrastructure Strategy for the County.	A007		<p>The contents of this submission have been noted.</p>
ii) Submission requests that the County Development Plan should adopt a Green Infrastructure approach.	A017		<p>It is expected that the forthcoming County Development Plan will adopt a Green Infrastructure approach.</p>

Key Issue Section 3: Green Infrastructure Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
iii) Submission makes reference to green infrastructure and discusses the merits of the Dún Laoghaire Harbour Masterplan.	A099	3	The contents of this submission are noted and will be considered during the preparation of the Draft Plan.
iv) Submission indicates the importance in land use planning and environmental protection of Green Infrastructure.	A117		The Council has recently appointed consultants to prepare a Green Infrastructure Strategy for the County and it is envisaged that the outcomes of the strategy will inform the preparation of the Draft Plan.
3.2.4 Sports Development			
i) Submission requests that sailing training should be encouraged in schools and that the harbour is the ideal place to teach students how to sail and survive at sea.	A016	3	This is noted. The issue of sailing training is not, however, a strategic County Development Plan issue.
ii) Submission requests that an objective be attached to the St. Thomas Estate for the promotion of athletics for children and adults.	A034	5	It is considered that this request has merit and will be examined during the preparation of the Draft Plan. Any objective for this site would need to have regard to the site topography, natural and built heritage while also ensuring a high standard of design quality for any new works.
iii) Submission indicates that Dún Laoghaire Harbour offers world class leisure sailing resource and policies recognising and supporting water-based recreational uses should be provided within the County Development Plan. Submission requests that the policies for the protection and enhancement of water based	A077 A081	3	Sports development and recreation will be encouraged through a series of objectives/policies that will be examined in the preparation of the Draft Plan. This may include the possibility of including a specific policy in relation to water-based sports.

Key Issue Section 3: Green Infrastructure Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
recreational amenity in Dún Laoghaire Harbour be included in the 2016-2022 County Development Plan.			
iv) Submission requests that a 50 metre swimming pool be built at Glenalbyn or Ballyogan.	A079	6 9	The proposed redevelopment of Glenalbyn does not include for the development of a 50 metre pool. Phase 1 of the Samuel Beckett Civic Campus is currently under construction in Ballyogan. Phase 2 of this development will include a 6 lane 25 metre swimming pool.
v) Submission requests that consideration should be given to providing a cycle racing facility in the Jamestown landfill area.	A090	9	The contents of this submission will be considered during the preparation of the Draft Plan.
vi) Submission requests that the redevelopment of Glenalbyn Pool be fast tracked.	A092	6 9	Funding has been provided in the Council's Capital Programme for the development of a leisure facility at Glenalbyn.
vii) Submission seeks supports from the Council for sport and rugby in the County. DLR should develop further open recreational space for use as grass playing pitches, should promote sporting hubs in the major parks and should partner with local sporting organisations in the development of pitches and facilities. The submission also indicates that they would be interested in partnering with DLR to develop a pitch for rugby.	A093		The contents of this submission will be considered during the preparation of the Draft Plan.
viii) Submission seeks an objective in the emerging County Plan for a high standard running track and that Marlay Park would be an ideal venue for such a facility.	A110	5	The contents of this submission will be considered during the preparation of the Draft Plan.

SECTION 4
PHYSICAL INFRASTRUCTURE STRATEGY

Key Issue Section 4: Physical Infrastructure Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
4.1 Environmental Infrastructure & Management			
4.1.1 Water & Wastewater Infrastructure			
i) Submission supports the areas currently zoned for development, which will require the provision of water and wastewater infrastructure being delivered by Irish Water.	A007		The Council no longer has any direct control in relation to the provision of water and wastewater services. The delivery, integration and implementation of strategic water and wastewater projects and infrastructural improvements are now the responsibility of Irish Water. However the Council will continue to develop a close working relationship with Irish Water to achieve common objectives such as alignment with the RPGs settlement strategy and ensuring that the provision of water/wastewater services will not be a limiting factor in terms of forecasted growth. This will be reflected within the Draft Plan.
ii) Submission requests that an Infrastructure Delivery Plan is developed as part of the Draft Plan, which links the delivery of key pieces of social, physical and environmental infrastructure with the sequential and phases development of zoned land. Submission requests that the quantum of land zoned in the Draft Plan must be carefully matched and phased with the existing and/or planned Population Equivalent (PE) capacity of the local waste-water treatment plan.	A017		The Council no longer has any direct control in relation to the provision of water and wastewater services. The delivery, integration and implementation of strategic water and wastewater projects and infrastructural improvements are now the responsibility of Irish Water. However the Council will continue to develop a close working relationship with Irish Water to achieve common objectives such as alignment with the RPGs settlement strategy and ensuring that the provision of water/wastewater services will not be a limiting factor in terms of forecasted growth. This will be reflected within the Draft Plan. The amount of serviced zoned land will be audited and reviewed and the findings utilised in the preparation of the Core Strategy.
iii) Submission requests that the use of Integrated Constructed Wetlands (ICW) is explored as a low-cost and environmentally sustainable alternative to heavy engineered and energy intensive wastewater treatment facilities.	A017		The use of Integrated Constructed Wetlands (ICW) may, in site specific circumstances, be a viable option as part of larger suite of SUDs measures. It should be noted that the application of ICW is considered somewhat limited in an urban built environment. In addition, as stated above, the Council no longer has any direct control in relation to the provision of water and wastewater services. The delivery, integration and implementation of strategic water and wastewater projects and infrastructural improvements are now the responsibility of Irish

Key Issue Section 4: Physical Infrastructure Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
			Water.
iv) Submission would support a more flexible approach in situations where developers are willing to provide required infrastructure. The Plan should have appropriate flexibility to ensure development is not unintentionally restricted.	A055 A116		The Council no longer has any direct control in relation to the provision of water and wastewater services. The delivery, integration and implementation of strategic water and wastewater projects and infrastructural improvements are now the responsibility of Irish Water. However the Council will continue to develop a close working relationship with Irish Water to achieve common objectives such as alignment with the RPGs settlement strategy and ensuring that the provision of water/wastewater services will not be a limiting factor in terms of forecasted growth. This will be reflected within the Draft Plan.
v) Submission requests that DLR liaise directly with Irish Water to deliver the infrastructure required. Would welcome a combination of appropriate interim and/or phased infrastructural water and wastewater works at Woodbrook and Old Conna. Submission supports the phased delivery of these schemes which could be advanced with initial developer funding in the absence of allocated public funding.	A068 A094	10 14	The Council no longer has any direct control in relation to the provision of water and wastewater services. The delivery, integration and implementation of strategic water and wastewater projects and infrastructural improvements are now the responsibility of Irish Water. However the Council will continue to develop a close working relationship with Irish Water to achieve common objectives such as alignment with the RPGs settlement strategy and ensuring that the provision of water/wastewater services will not be a limiting factor in terms of forecasted growth. This will be reflected within the Draft Plan. Note: The inclusion of the Old Connaught / Woodbrook Water and Wastewater schemes within Irish Waters Proposed Capital Investment Plan 2014-2016 at the " <i>continue planning and business case review</i> " stage should be noted.
vi) Submission requests that all existing infrastructure is upgraded or expanded to include additional capacity to ensure future growth is possible.	A112		The Council no longer has any direct control in relation to the provision of water and wastewater services. The delivery, integration and implementation of strategic water and wastewater projects and infrastructural improvements are now the responsibility of Irish Water. However the Council will continue to develop a close working relationship with Irish Water to achieve common objectives such as alignment with the RPGs settlement strategy and ensuring that the provision of water/wastewater services will not be a limiting factor in terms of forecasted growth. This will be reflected within the Draft Plan.

Key Issue Section 4: Physical Infrastructure Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
4.1.2 Water and Wastewater Infrastructure- Rathmichael			
i) Submission would welcome the introduction of a Specific Local Objective (SLO) to limit future development in the Rathmichael area, until current wastewater infrastructural deficiencies are addressed.	A054 A057	10 13 14	The current wastewater infrastructural deficiencies in the Rathmichael area are acknowledged. Consideration will be given to the incorporation of a policy - within the Draft Plan – taking into account future development in the area until wastewater infrastructural deficiencies are addressed.
ii) Submission requests that an objective to address the current infrastructural deficits within the Rathmichael area is included within the Plan.	A060 A098	9 10 13 14	The current wastewater infrastructural deficiencies in the Rathmichael area are acknowledged. The Council no longer has any direct control in relation to the provision of water and wastewater services. The delivery, integration and implementation of strategic water and wastewater projects and infrastructural improvements are now the responsibility of Irish Water. However the Council will continue to develop a close working relationship with Irish Water to achieve common objectives such as alignment with the RPGs settlement strategy and ensuring that the provision of water/wastewater services will not be a limiting factor in terms of forecasted growth. This will be reflected within the Draft Plan.
iii) Submission would oppose any proposals to extend the mains drainage in the Rathmichael area.	A098	10 13 14	The contents of this submission have been noted – see response 4.1.2 ii) above.
4.1.3 Water and Wastewater – Policies & Objectives			
i) Submission requests the inclusion of a suite of integrated policy measures to ensure that the Planning Authority's legal obligations under the Water Framework Agreement (WFD) and the	A017		The Council recognises the importance and the legal obligations associated with both the WFD and the RBMP and will incorporate relevant policies when preparing the Draft Plan.

Key Issue Section 4: Physical Infrastructure Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
operable River Basin Management Plan (RBMP) are achieved.			
ii) Submission would welcome objectives and policies to exclude storm water from foul and combined foul and surface water drains managed by Irish Water in order to increase capacity for foul drainage in the sewer network and at treatment plants and to minimize impacts on the water environment from combined sewer overflows.	A109		The Council acknowledges the need to support and protect investments currently being made by Irish Water in terms of the management of water and wastewater. The contents of this submission are noted and will be considered when preparing the Draft Plan.
iii) Submission would welcome objectives and policies encouraging householders and businesses to conserve water.	A109		The Council acknowledges the need to support and protect investments currently being made by Irish Water in terms of the management of water and wastewater. The contents of this submission are noted and will be considered during the preparation of the Draft Plan.
iv) Submission requests the inclusion of an objective stating that DLR will work with Irish Water to achieve common objectives.	A116		The Council will continue to develop a close working relationship with Irish Water to achieve common objectives such as alignment with the RPGs settlement strategy and ensuring that the provision of water/wastewater services will not be a limiting factor in terms of forecasted growth. This will be reflected within the Draft Plan.
4.1.4 Localised Drainage Issues			
i) Submission raises concerns over recent man made flooding events at Corbawn Drive which was compounded by an overflow mechanism that resulted in a mix of foul and rain water being released locally. Request that this inadvertent mixing of land drainage and sewerage is investigated. Submission raises concerns in relation to the outflow from 'land water drainage' outlets that	A051 A058 A059	10	It is considered that these are operational matters and not strategic County Development Plan issues.

Key Issue Section 4: Physical Infrastructure Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
<p>enter the sea at the end of Corbawn Lane.</p> <p>Submission would welcome additional drains being located on Quinn's Road to ensure no further flooding occurs and would welcome the maintenance of all drains on roads.</p>			
<p>4.1.5 Waste Management Infrastructure</p>			
<p>i) Submission requests the inclusion of an objective for a waste separation plant that can extract recyclable waste from mixed waste.</p>	<p>A112</p>		<p>In relation to the treatment of waste, DLR is committed to developing a waste management model which conforms to the European Union and National Waste Management Hierarchy. The 'Dublin Regional Waste Management Plan 2005-2010' – is being comprehensively reviewed this year. A new Regional Waste Management Plan for the Eastern and Midlands Region is to be published for the first quarter of 2015. Any waste management policies and objectives contained within the new Regional Plan – including the provision of a waste separation plant - will be considered when preparing the Draft Plan.</p>
<p>4.1.6 IT & Telecommunications Infrastructure</p>			
<p>i) The submission seeks support for the improvements to IT infrastructure within Dún Laoghaire, with a particular focus on broadband speeds for businesses.</p>	<p>A095</p>	<p>3</p>	<p>The Council does not have any direct control in relation to the provision of IT infrastructure, however, improvements policies and / or objectives which support the provision of IT infrastructure and broadband speeds will be considered when preparing the Draft Plan</p>
<p>4.1.7 Energy Infrastructure</p>			
<p>i) Submission recommends the Draft Plan contains reference to the "Government Policy Statement on</p>	<p>A061</p>		<p>The specific contents of this submission will be considered when preparing the Draft Plan.</p>

Key Issue Section 4: Physical Infrastructure Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
<p>Strategic Importance of Transmission and Other Energy Infrastructure".</p> <p>Submission also recommends that a section on Energy and Energy Infrastructure is included with three separate policies suggested, which relate to:</p> <ul style="list-style-type: none"> • The Council promoting Eirgrid's Grid 25 Strategy • The facilitation of energy networks in principle (subject to certain caveats) • The Council engaging with Eirgrid when consulted on strategic infrastructural projects relating to electricity. 			
<p>4.1.8 Environmental Management - Development Management Issues</p>			
<p>i) Submission requests the Development Plan prohibits the laying of concrete and asphalt on open ground and that no new developments on or near vulnerable watercourses takes place.</p>	<p>A015</p>		<p>The issues raised shall be considered during the preparation of the Draft Plan.</p> <p>It should be noted that it will remain Council policy to ensure that all development proposals incorporate Sustainable Urban Drainage Systems (SUDS) that are consistent with the Greater Dublin Strategic Drainage Study. Development will only be permitted where the Council is satisfied that suitable measures have been considered that balance the impact of urban drainage through the achievement of control of run-off quantity and quality, and enhances amenity and habitat. In particular the requirements of the '<i>SUDS Manual by the UK's Construction Industry Research and Information Association (CIRIA)</i>' shall be followed unless specifically exempted by Council.</p> <p>In addition, the existing County Development Plan contains a robust set of policies and objectives relating to the protection of the environment, riparian corridors, biodiversity, waterways and both designated and undesignated sites. It is intended that the new Plan will</p>

Key Issue Section 4: Physical Infrastructure Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
			further strengthen this section having regard to changes in National and European environmental legislation. Policies will address issues including biodiversity / riparian corridors, connection of the county's green spaces, planting of trees and the development of wetlands and marshes.
ii) Submission seeks the prescription of mandatory Sustainable Urban Drainage Systems (SUDS) measures and rainwater harvesting for all new development proposals.	A017		<p>SUDs measures appropriate to the scale and location of development will be conditioned for all new developments.</p> <p>It should be noted that the Council are proactive on the issue of Green Roofs. The existing County Development Plan contains references to the Council's 'Green Roofs Guidance Document' in which mandatory thresholds and types of development for which green roofs are required are prescribed.</p>
iii) Submission would support a flexible approach in relation to sustainability initiatives so as to allow individual projects develop solutions on a case-by-case basis. Concerns that requiring certain solutions for all developments is not appropriate i.e. the provision of a green roof on a single storey supermarket is not appropriate due to the general structure of these buildings or the placement of solar panels which could adversely affect the performance of green roof construction. Not all SUDs measures can be accommodated within all developments.	A037 A055		<p>SUDs measures appropriate to the scale and location of development will be conditioned for all new developments.</p> <p>There are various examples of green roofs in all development types. In this regard, structural engineers are adept at designing columns to withstand any roof weight. Where space is limited other soft measures may be acceptable. Green walls may be considered as an alternative to green roofs.</p> <p>It is considered achievable to accommodate both solar panels and a green roof on the same roof.</p>

Key Issue Section 4: Physical Infrastructure Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
4.2 Climate Change Adaptation & Energy Efficiency			
4.2.1 General			
i) Submission suggests that there can be conflict between sustainability strategies such as green roof construction and solar panels.	A037		The contents of this submission have been noted. It is considered that good design can overcome any such conflicts.
ii) Submission contends that climate change is a global problem. Local efforts to reduce greenhouse gases should be made in line with European targets.	A112		Agreed.
iii) Submission states that the majority of carbon emissions come from vehicle usage. Promoting electrical and hybrid vehicles as well as changing the current stock of buses etc to greener forms of transport should be considered.	A112		DLR have played a strong role in promoting electrical vehicles with policies relating to both contained in the existing County Development Plan. It is current policy that nonresidential developments provide recharging facilities for battery-operated cars. DLR is not responsible for the bus stock that serves the county.
4.2.2 Renewable Energy			
i) Submission requests that a flexible approach be given in the planning process towards achieving sustainable objectives.	A037		The contents of this submission have been noted.
ii) Submission states that hydro and wind schemes can provide clean energy but can have serious	A112		The County Development Plan 2010 - 2016 includes a Wind Energy Strategy which analyses suitable area for wind energy based on a number of criteria that include landscape evaluation

Key Issue Section 4: Physical Infrastructure Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
environmental effects including visual intrusion.			and sensitivity, natural and build heritage designations and Development Plan objectives that include views and prospects. This strategy concluded that there were no land-based areas in the County where large-scale commercial wind energy infrastructure should be either acceptable or permitted in principle. It is recommended that the new Plan incorporate this Wind Energy Strategy.
4.2.3 Energy Efficiency			
i) Submission states that fossil fuel and climate change are the biggest interrelated and defining challenges of our time.	A017		It is agreed that fossil fuel and climate change are among the biggest challenges of our time.
ii) Submission argues that the primary objective of the County Development Plan should be to break the locality's dependence on oil.	A017		The County Development Plan sets out the overall strategy for the proper planning and sustainable development of an area and must include objectives which promote sustainable settlement and transportation strategies including measures to reduce energy demand, measures to reduce greenhouse gas emission and address the necessity of adaptation to climate change. The Development Plan will contain many policies, which will in themselves impact on usage of non-renewable energy sources.
iii) Submission suggests that the Council should prepare a local Climate Change Strategy.	A017		<p>In December 2012 the Department of Environment, Community and Local Government (DoECLG) published the National Climate Change Adaptation Framework.</p> <p>The DoECLG has been identified as the lead body on National Adaptation policy. Local Authorities have been given the role to prepare local adaptation plans through the Development Plan review process.</p> <p>Guidance on how to prepare these strategies is currently being prepared by the EPA and may be available by the end of 2014. Preparing a strategy is likely to be task which will require significant resources and buy in at all levels and from all Council departments. Due to the time frames involved in terms of preparation of the Draft Plan it is likely that work on the strategy will commence post adoption of the Plan and will be incorporated into the Plan by way of a statutory Variation.</p>

Key Issue Section 4: Physical Infrastructure Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
iv) Submission request that minimum BER ratings should be imposed on new builds. Grants should be available for existing home owners to improve energy efficiency.	A112		Currently all new buildings constructed in the County must accord with part L of the Building regulations which ensures that the resultant buildings have a high BER rating. Grants are currently available for various works from www.seai.ie .
v) Submission agrees that the submission of energy statements as part of planning applications is an excellent idea.	A112		This is agreed in relation to larger planning applications.
4.3 Flood Risk			
4.3.1 General			
i) Submission suggests that in order to address flooding, flood defenses and drainage schemes should be studied to determine the most cost effective solutions.	A112		<p>The Office of Public Works (OPW) are the lead authority on flooding in the Country and in 2011 they commenced a National Catchment Flood Risk Assessment and Management (CFRAM) programme. CFRAM is currently being carried out for the Eastern Region which includes Dún Laoghaire-Rathdown. The Eastern CFRAMs are still being finalised and are not in the public domain (July 2014).</p> <p>The fact that the Eastern CFRAM study is not yet in the public domain places DLR in a vacuum in terms of information. It is hoped that the CFRAM study will have progressed in time to dovetail with publication of the Draft Plan.</p> <p>The objectives of the CFRAM project are to identify and map existing and future potential flood hazard risk, identify measures for managing that flood risk and develop a long term strategy for dealing and managing that risk. The CFRAM process has involved the collection of survey data and the development of hydraulic computer models of the various rivers. The project would have included the study of flood defenses and drainage schemes and a key element is cost benefit analysis of proposed solutions.</p>

Key Issue Section 4: Physical Infrastructure Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
ii) Submission recommends that new development on flood plains should be prevented.	A015		Strategic Flood Risk Assessment (SFRA) will be used to avoid new development on flood plains.
iii) Submission suggests that County Development Plan should down zone lands in Flood Zones A or B applying the sequential approach. If the zoning is to be retained a detailed Justification Test must be done.	A017		<p>As part of the Development Plan process the Council will be carrying out SFRA in accordance with the then DoEHLG Guidelines "The Planning System and Flood Risk Management, Guidelines for Planning Authorities" published in November 2009.</p> <p>The purpose of the SFRA will be to provide sufficient information to allow sound planning decisions to be made on sites at risk of flooding over the lifetime of the next County Development Plan 2016 – 2022 and also to ensure that Elected Members have appropriate information with regard to flooding, the sequential approach and the Justification Test in coming to decisions on the Draft Plan.</p> <p>There are three key principles that underpin the sequential approach in flood risk management. These are:</p> <ul style="list-style-type: none"> • Avoid the risk, where possible, • Substitute less vulnerable uses, where avoidance is not possible, and • Mitigate and manage the risk, where avoidance and substitution are not possible. <p>The Guidelines state that where an authority is considering the future development of areas in an urban settlement that are at moderate or high risk of flooding, for uses or development vulnerable to flooding that would generally be inappropriate, it must be satisfied that it can clearly demonstrate on a solid evidence base that the zoning or designation for development will satisfy the Justification Test.</p> <p>The fact that the Eastern CFRAM study is not yet in the public domain places DLR in a vacuum in terms of information for generating the SFRA. It is hoped that the SFRAM study will have progressed in time to dove-tail with publication of the Draft Plan.</p>
iv) Submission recommends that any maps on flood risk must include gradient, embankments, existing flood attenuation measures and capacity of culverts.	A029		The CFRAMS process referred to above will generate a suite of maps which will include flood extent maps, flood depth maps, flood velocity maps and flood hazard maps.

Key Issue Section 4: Physical Infrastructure Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
<p>v) Submission requests good communication on Flood Risk Management.</p> <p>Submission suggests that there is a need to investigate if culvert pipes for Deansgrange River are subject to silting that could slow down flow.</p> <p>Submission recommends that there is a need to monitor silting in Shanganagh River at Bayview Glen.</p> <p>Submission raises the issue of flood insurance. Submission requests flood warnings on spring tide surges. An example is a text alert system.</p>	A029		The contents of the submission are noted, however these are not considered to be strategic County Development Plan issues but Water Services Operations Section issues.
vi) Submission recommends that natural flood plains along streams be restored by widening streambeds and using planting.	A045		The contents of the submission are noted, however these are not considered to be strategic County Development Plan issues but Water Services Operations Section issues.
vii) Submission states that planning should enhance flood control and not exacerbate it.	A079		The contents of the submission are noted, however these are not considered to be strategic County Development Plan issues but Water Services Operations Section issues.
4.3.2 Specific flooding issues			
i) Submission recommends that coastal towns such as Blackrock and Dún Laoghaire need flood defences.	A014		The contents of the submission are noted, however these are not considered to be strategic County Development Plan issues but Water Services Operations Section issues.
ii) Submission requests a monitored sensor for river water levels at Bayview Glen and on the Deansgrange River between Bayview and Seafield.	A029		The contents of the submission are noted, however these are not considered to be strategic County Development Plan issues but Water Services Operations Section issues.

Key Issue Section 4: Physical Infrastructure Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
<p>Submission states that flooding has exacerbated in the Bayview estate. Questions whether there is a need for an emergency plan for estates like Bayview.</p> <p>Submission requests that information on water levels in the Shanganagh River at Bayview Glen and the Deansgrange River at the culvert grid between Seafield and Bayview be linked to the OPW water level website for easily accessible real time information.</p> <p>Submission requests use of soft engineering works to provide more river water soakage at Loughlinstown Common Woodlands and Ecopark.</p> <p>Submission argues that flood attenuation works upstream have created greater hazard for Bayview.</p>			The contents of the submission are noted, however these are not considered to be strategic County Development Plan issues but Water Services Operations Section issues.
iii) Submission raises impact of Cherrywood development on flooding down stream.	A029		Stringent SUDs measures are incorporated into the Cherrywood Planning Scheme.
iv) Submission requests a wider exit pipe through the railway embankment or a second culvert to deal with the Deansgrange River at Seafield Estate.	A029		The contents of the submission are noted, however these are not considered to be strategic County Development Plan issues but Water Services Operations Section issues.
v) Submission raises issue of man made flooding in Corbawn Drive due to Tennis Club development.	A051 A058		The contents of the submission are noted, however these are not considered to be strategic County Development Plan issues but Roads Maintenance Section issues.
vi) Submission requests six new drains along Quinn's Road to deal with surface water.	A051 A058		The contents of the submission are noted, however these are not considered to be strategic County Development Plan issues but Roads Maintenance Section issues.

SECTION 5
BUILT HERITAGE STRATEGY

Key Issue Section 5: Built Heritage Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
5.1 Archaeological Heritage			
5.1.1 Access to Archaeological Monuments			
i) Submission requests that a right of way beginning opposite Rose Cottage, Killiney Hill Road and ending opposite the Monument of Killiney Church would be considered as part of the monument itself as the ROW functioned as a funeral way for burials at the church.	A056	4 7	The contents of this submission have been noted.
ii) Submission suggest that in the context of DLR Heritage Management Plan the new County Development Plan needs to include objectives relating to the implementation of conservation, management and access plans for key sites including: <ul style="list-style-type: none"> • Tully Church • Glen Druid Valley and Glen Druid House • Rathmichael early medieval monastic site • Ballyman, dedicated to St Kevin • Pucks Castle, Shankill 	A067	10 13 14	The contents of this submission will be considered during the preparation of the Draft Plan. However, it should be noted that the Council has no control over Protected Structures, Monuments and/or archaeological sites in private ownership and cannot, therefore, commit to improving public accessibility to same.
iii) Submission requests the Council to support, promote and preserve public access to Dalkey Island for recreational users and protect its landscape character, amenities and heritage from inappropriate development	A117	4	Issues addressed in this submission are already covered by policies and objectives in the current Development Plan including AH1, AH2, AH3, AH4, AH5 and AH6 which will be reincorporated in the preparation of the Draft Plan. The forthcoming Draft Development Plan will have due regard to the recently published 'Dalkey Islands Conservation Plan, 2014-2024'.

Key Issue Section 5: Built Heritage Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
5.1.2 Miscellaneous			
i) Submission requests that an exhibition of Heritage sites and monuments should be provided along with useful information available online and on-site.	A112		The contents of this submission have been noted.
ii) Submission states that there may be tourism potential in relation to archaeological and architectural heritage within the County. Preservation of such sites/buildings for education purposes should be prioritised rather than exploiting them for economic benefits.	A112		<p>Agreed. There is a balance to be struck between increasing access to key heritage sites and their protection to ensure that this finite resource is not compromised. The Council is committed to achieving this by the formulation of appropriate policies and objectives in the preparation of the Draft Plan.</p> <p>The contents of this submission will be considered during the preparation of the Draft Plan.</p>
iii) Submission requests that Archaeological Landscapes are identified.	A117		Policy AH4 of the County Development Plan 2010-2016 deals with the designation of Archaeological Landscapes. It is envisaged that this objective will follow through in the preparation of the Draft Plan.
iv) Submission requests additional appendices for Historic Graveyards, Preservation Orders on Monuments and Zones of Archeological Potential.	A117		Many of the County's historic burial grounds are listed in Appendix C, Schedule 2, Record of Monuments & Places (RMP) in the County Development Plan 2010-2016. The RMP also includes those sites which are the subject of Preservation Order and are marked with (P). Zones of Archaeological Potential are designated by the Department of Arts, Heritage and the Gaeltacht (DAHG) and not the Council. The Historic Town of Dalkey is the only area to have been given this designation to date as per Policy AH3.

Key Issue Section 5: Built Heritage Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
5.2 Architectural Heritage			
5.2.1 Record of Protected Structures (RPS)			
i) Submissions seek clarification on the status of a property known as Durham Cottage, Tivoli Road and, if not already protected, request its inclusion on the RPS.	A004 A049	3	As part of the process leading towards the new Development Plan the current RPS will be reviewed. Any recommendations for the inclusion of a structure will be considered against the categories of Special Interest (architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest) as set in the Planning and Development Act, 2000. Any structure, which has one or more of the above categories of special interest, shall be recommended for inclusion in the RPS.
ii) Submission seeks the removal of Mountainview House from the Record of Protected Structures.	A052	1	Any structure proposed for removal from the RPS will be assessed using the same procedures for making additions. Deletions will only take place where the Planning Authority considers that the structure has entirely lost its special interest. The removal of structure from the RPS is a reserved function of the Elected Members.
iii) Submission seeks a review of structures within Cornelscourt Village with a view to protecting structures from a heritage aspect.	A069	6	As part of the process leading towards the new Development Plan the current RPS will be reviewed. Any recommendations for the inclusion of a structure will be considered against the categories of Special Interest (architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest) as set in the Planning and Development Act, 2000. Any structure, which has one or more of the above categories of special interest, shall be recommended for inclusion onto the RPS.
iv) Submission requests that there should be a review of Protected Structures periodically to check if structures should be removed. This would depend on their architectural and historical value and only removed with a very strong case to do so.	A112		Any structure proposed for removal from the RPS will be assessed using the same procedures for making additions. Deletions will only take place where the planning authority considers that the structure has entirely lost its special interest. The removal of structures from the RPS is a reserved function of the elected members.

Key Issue Section 5: Built Heritage Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
5.2.2 Architectural Conservation Areas (ACAs)			
i) Submission requests that ACAs are further strengthened and encouraged in the new Development Plan. Support and encouragement is provided for the designation of Dún Laoghaire Harbour as an ACA or the equivalent of a Special Area of Conservation.	A006 A016 A017	3	There is a statutory obligation under the Planning & Development Act, 2000 for Planning Authorities to include objectives to preserve ACAs within a Development Plan. The Council will progress the adoption of Candidate ACAs currently listed in Appendix C Schedule 4 of the County Development Plan 2010-2016, in accordance with Chapter 3 of the DAHG 'Architectural Heritage Protection Guidelines' and to critically assess additional candidate areas that may benefit from such designations.
ii) Submission states that Dún Laoghaire Harbour warrants Candidate Architectural Conservation Area status due to the conglomeration of protected structures and monuments.	A016 A077 A099	3	The Harbour is a cACA and there are no plans to remove this designation in the preparation of the Draft Plan.
iii) Submission states that there should be encouragement for designated ACAs to having utility lines underground.	A016		Policy AR9 of the County Development Plan 2010-2016 deals with this subject. This Policy will be retained in the preparation of the Draft Plan.
iv) Submission seeks the designation of Special Planning Control Schemes.	A017		Under the provisions of Section 84 of Planning & Development Act, 2000, and Section 3.13.1 of the DAHG 'Architectural Heritage Protection Guidelines', 'a Planning Authority may, if it considers that all or part of an ACA is of special importance to, or as respects, the civic life or the architectural, historical, cultural, or social character of a city or town in which it is situated, prepare a scheme setting out development objectives for the preservation and enhancement of that area, or part of that area, and providing for matters connected therewith.'
v) Submission requests that the Foxrock ACA designation be continued in the new Development Plan and possibly be extended with any new development being mindful of this	A046	6	There is an existing ACA for Foxrock and there are no plans to remove this designation. Once objectives to preserve an ACA have been approved by the Elected Members it carries through from Development Plan to Development Plan (as set out in Section 3.1.2 of the Architectural Heritage Protection Guidelines).

Key Issue Section 5: Built Heritage Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
<p>designation, particularly those developments within the considerable amount of backland area available for development.</p>			<p>The boundaries of the Foxrock ACA were defined after careful consideration of the wider Foxrock area.</p> <p>An additional area within Foxrock – Knocksinna, has been designated a candidate ACA, but it is geographically severed from the Foxrock ACA. Knocksinna therefore will be a stand alone ACA once its status is confirmed.</p>
<p>vi) Submission states Dún Laoghaire Harbour is of International heritage value which should be recognized in the Draft Plan through key strategic objectives as set out in the Harbour Masterplan:</p> <ul style="list-style-type: none"> • '15. Seek to protect the heritage of the Harbour and ensure the implementation of the Architectural Heritage Management Plan • 16. Secure the preservation of all Protected Structures within the Harbour area. • 17. Have regard to the designation of part of the Harbour area as a proposed ACA. • 18. Seek to preserve archaeological heritage through investigation, preservation in-situ and recording as appropriate'. 	A099	3	<p>Agree with the sentiments expressed in this submission. The Council recognises the significance of the Harbour as indicated by the number of Protected Structures listed in RPS, the listing of the Harbour as a cACA and in Policy AR7: Protection of Coastline Heritage. The Archeology Heritage is protected under Policy AH1, AH2 and AH6 all of which will be retained in the preparation of the Draft Plan.</p> <p>The Heritage Management Plan prepared by Dún Laoghaire Harbour Company has no statutory basis.</p>
<p>5.2.3 General Architectural Heritage</p>			
<p>i) Submission requests that The Architectural Heritage Protection Guidelines for Planning Authorities must be implemented in full.</p>	A017		<p>As stated in Policy AR1 of the County Development Plan 2010-2016 the Council has regard to the DAHG 'Architectural Heritage Protection Guidelines for Planning Authorities' in assessing proposals for Protected Structures.</p>
<p>ii) Submission requests that Blackrock and Dún</p>	A033	2	<p>It is an objective of the Council to facilitate improvements to both Blackrock and Dún</p>

Key Issue Section 5: Built Heritage Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
<p>Laoghaire Baths should be demolished.</p>		<p>3</p>	<p>Laoghaire Baths by way of public realm improvements and/or refurbishments of existing structures. SLO9 of the County Development Plan encourages the redevelopment of the Blackrock Baths and DART Station area. In the preparation of the Draft Blackrock Local Area Plan, it is anticipated that further improvements will be proposed. SLO21 of the County Development Plan proposes to improve the area between East Pier and Sandycove including the upgrading of the Dún Laoghaire Baths site.</p> <p>The Council is well advanced in preparing a proposal for interim works at the Dún Laoghaire Baths site. These works include,</p> <ul style="list-style-type: none"> • the renovation and re-opening of pavilion building to provide a public café/gallery, toilets, terrace area and artists studios • the creation of a new route with associated landscaping to connect the walkway at Newtownsmith to both the East Pier and the Peoples Park • enhanced facilities for swimming and improved access to the waters edge e.g. ramps, steps and renovation of the existing bandstand and • the creation of a small jetty in line with the existing structure and the provision of a changing area.
<p>iii) Submission states that redevelopment of redundant or derelict buildings are very important as this can define the character of an area. The dereliction of any structure should not be allowed.</p>	<p>A112</p>		<p>Agreed. This however is not a matter that can be dealt with in the context of the Development Plan. This should be dealt with through the established Derelict Sites Legislation. Any property/site referred to Derelict Sites Section would automatically trigger a site inspection.</p>
<p>iv) Submission states that the reason for protecting a building in the first place should be preserved in any future provision of energy efficiency and universal access.</p>	<p>A112</p>		<p>Agreed. Policy AR5 of the County Development Plan 2010-2016 deals with Energy Efficiency and Protected Structures. This Policy will be retained in the preparation of the Draft Plan.</p>
<p>v) Submission requests that support be given to a practical approach regarding development within the curtilage of a protected structure and the timing and phasing of any such work in the</p>	<p>A116</p>		<p>The inclusion of a structure onto the RPS does not prevent development within the curtilage of a structure provided that the impact of any proposed development does not negatively affect its character and setting in accordance with the DAHG 'Architectural Heritage Protection Guidelines'.</p>

Key Issue Section 5: Built Heritage Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
context of the overall development.			It is envisaged that Development Management guidelines for development in relation to Protected Structures as set out in Policy DM4 will be elaborated upon in the preparation of the Draft Plan.

SECTION 6
COMMUNITY STRATEGY

Key Issue Section 6: Community Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
6.1 Social & Community Development			
6.1.1 Social Inclusion			
i) Submission requests that there is better integration of homeless accommodation across the County rather than provision in only certain areas.	A013		The contents of this submission will be considered during the preparation of the Draft Plan.
ii) Submission requests a more meaningful engagement with local communities, including children, in the development plan process.	A017		<p>There is a statutory obligation as set down within the Planning and Development Act 2000, as amended, that any plan must go through public consultation to ensure that local communities have their input in the preparation of a Plan.</p> <p>It should be noted that The Planning and Development (Amendment) Act 2010, added Section 11(2)(bb) which states that children or groups representing the interests of children are entitled to make submissions / observations. Having regard to this amendment in legislation, the pre-draft consultation process specifically targeted post primary schools within the County seeking input to the Draft Plan.</p>
iii) Submission has stated that the Council appears to be following Government policy of 'Putting People First'.	A038		It is a statutory requirement that the preparation of the forthcoming County Development Plan has regard to all relevant Government and National policies. The Local Government Reform Act 2014 made legal provision for the reforms set out in the Government's Action Programme for Effective Local Government, Putting People First.
iv) Submission requests that the principal of accessibility and Universal Design should be promoted more rigorously in any new development given the demographics of the County. This should be included in each section of the Plan.	A039		The forthcoming County Development Plan will continue to promote access for all in new developments in line with Building Control requirements.

Key Issue Section 6: Community Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
v) Submission requests that the Housing Strategy should note the need to provide housing for the homeless, that the Plan should support National and Regional policies to alleviate homelessness and it should commit to addressing the needs of the homeless households in the County.	A102		The forthcoming County Development Plan and Housing Strategy must seek to strike a balance between providing for the needs of all citizens requiring social housing supports, including those who are homeless, rough sleeping or at risk of homelessness and ensuring protection of amenities in residential areas. The contents of this submission are noted and will be considered during the preparation of the Draft Plan.
vi) Submission states that there is a need to engage the community to build together, and if funding is insufficient then compromises are required on both sides – limited funding should not be used as an excuse to do nothing.	A112		Agreed. It is an objective of the Council to engage with key stakeholders / community groups etc to develop shared responsibility for community development in the County. Policy SCC2 of the County Development Plan 2010-2016 states that everyone should be able to participate in and contribute to community life. These objectives and policies will be reincorporated into the preparation of the Draft Plan. The specific contents of this submission are noted and will be considered during the preparation of the Draft Plan.
6.1.2 Housing and Services for the Elderly			
i) Submission supports the provision of retirement villages.	A038		The forthcoming County Development Plan will support the development of Elderly accommodation and specific policies and objectives will be examined during the preparation of the Draft Plan.
ii) Submissions relate primarily to the provision of housing and meeting the needs of older people within the County. Specific requests have been made as follows: <ul style="list-style-type: none"> • All potential sites suitable for sheltered housing should be identified and set aside • Housing supply and land use policy must have regard to the housing and community need of older people 	A044 A050		The forthcoming County Development Plan will support the development of Elderly accommodation and specific policies and objectives will be examined during the preparation of the Draft Plan.

Key Issue Section 6: Community Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
<ul style="list-style-type: none"> • An innovative response to providing housing for older people is required given constraints on availability of money • Consideration is given to joint development of sheltered dwellings between the Council and Charities • The Council should provide guarantees for commercial loans in order that charities could build sheltered housing in cases where the Government is not in a position to provide funding • The best practice model of sheltered accommodation, as used by the Abbeyfield organisation, requires substantial financial resources at the outset and rents alone would not service the cost of borrowing. 			
iii) Submission states that a similar project to that of Beaufort (Glasthule) is required in Dún Laoghaire.	A050	3	The forthcoming County Development Plan will support the development of Elderly accommodation and specific policies and objectives will be examined during the preparation of the Draft Plan.
iv) Submission states that there is need for better day care facilities for the elderly within the Shankill Area and should be developed in conjunction with local organisations.	A058 A059	10	The contents of this submission will be considered during the preparation of the Draft Plan. It should be noted that there are existing services provided within Shankill for older people including the Shankill Active Retirement Association (SARA) at the St Anne's Resource Centre and the Shankill Old Folks' Association at the Shankill Old Folks' Centre.
v) Submission states that there is a need for more community based sheltered accommodation within the Shankill area.	A058 A059	10	The forthcoming County Development Plan will support the development of accommodation for the Elderly and specific policies and objectives will be examined during the preparation of the Draft Plan.
vi) Submission requests that as the elderly will form a large demographic within the County it is essential that emphasis is placed on providing additional	A112		The contents of this submission will be considered during the preparation of the Draft Plan.

Key Issue Section 6: Community Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
<p>services for this age group.</p>			
<p>6.1.3 Community Facilities</p>			
<p>i) Submission requests that all social groups within the Shankill area are facilitated by the provision of social centre (perhaps within the Castle).</p>	<p>A058 A059</p>	<p>10</p>	<p>There are currently a number of community facilities available within the Shankill area, including the recently opened community centre at the Stonebridge Estate and Shanganagh House.</p> <p>An audit of existing community facilities in the County will be undertaken during the preparation of the Draft Plan. The results of this audit will identify deficits. These will be prioritised in the provision of facilities.</p>
<p>ii) Submission states that there is a need for community facilities within the St Columbanus Estate; over recent years the sense of community has been lost in the area and youth facilities/clubs and green spaces within the estate have been lost resulting in limited play opportunities for local children. There were plans for a playground but this has not been progressed.</p>	<p>A071</p>	<p>1</p>	<p>The provision of a playground within the estate is an operational matter for the Parks and Landscape Services Section of the Council.</p> <p>An audit of existing community facilities in the County will be undertaken during the preparation of the Draft Plan. The results of this audit will identify deficits. These will be prioritised in the provision of facilities.</p>
<p>iii) Submission requests that specific community facilities be provided as standard in line with local and neighbourhood developments in order to provide a successful community.</p>	<p>A112</p>		<p>The contents of this submission will be considered during the preparation of the Draft Plan.</p>

Key Issue Section 6: Community Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
6.1.4 Libraries and Leisure/Recreational Facilities			
i) Submission requests that sailing training is encouraged in schools; Dún Laoghaire harbour is the ideal place to teach students how to sail and survive at sea.	A016	3	Sports development and recreation will be encouraged through a series of objectives/policies. The Council will investigate the possibility of including a specific policy in relation to water based sports. Providing specific training within local schools however is a matter for each school and cannot be provided for within the County Development Plan.
ii) Submission requests that Shanganagh Castle be developed for community use and youth training. Facilities within the castle such as the gym should be made available and an enhanced library facility could be provided.	A058 A059	10	An audit of existing community facilities in the County will be undertaken during the preparation of the Draft Plan. The results of this audit will identify deficits. These will be prioritised in the provision of facilities.
iii) Submission states that Dún Laoghaire Harbour offers world class leisure sailing resource and policies recognizing and supporting water based recreational uses should be provided within the County Development Plan.	A077	3	Sports development and recreation will be encouraged through a series of objectives/policies. The Council will investigate the possibility of including a specific policy in relation to water based sports.
iv) Submission requests that consideration should be given to providing a cycle racing facility in Jamestown landfill area.	A090	9	The contents of this submission will be considered during the preparation of the Draft Plan.
v) Submission requests that the redevelopment of Glenalbyn Pool be fast tracked.	A092	6	Funding has been provided in the Council's Capital Programme for the development of a leisure facility at Glenalbyn.

Part 3: Summary of Main Issues & Chief Executive's Opinion & Recommendations

Key Issue Section 6: Community Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
vi) Submission request that a new library is provided within the Sandyford Industrial Estate.	A092	6	The adopted Sandyford Urban Framework Plan will provide for the development of a range of social facilities in this area. There is a library planned in Phase 2 of the Samuel Beckett Civic Campus on Ballyogan Road which will provide improved library facilities for the Sandyford area - in addition to existing Library services in Stillorgan.
vii) Submission states that there is a need for smaller local libraries in areas where such facilities do not exist and there may be potential to offer libraries in existing vacant commercial properties. The Killiney/Ballybrack area is in need of such a facility and provision of new/additional libraries should be included within the Development Plan.	A101	7 10	The forthcoming County Development Plan will continue to support library development. There are existing library facilities in Dalkey and Shankill which currently serve the Killiney/Ballybrack areas. Gaps in services provided will be examined in the preparation of the Draft Plan.
viii) Submission requests that the development of the Dún Laoghaire Baths site should include public swimming facilities.	A104 A113	3	The Council is well advanced in preparing a proposal for interim works at the baths site. These works include, <ul style="list-style-type: none"> • the renovation and re-opening of pavilion building to provide a public café/gallery, toilets, terrace area and artists studios • the creation of a new route with associated landscaping to connect the walkway at Newtownsmith to both the East Pier and the Peoples Park • enhanced facilities for swimming and improved access to the waters edge e.g. ramps, steps and renovation of the existing bandstand and • the creation of a small jetty in line with the existing structure and the provision of a changing area.
ix) Submission seeks an objective in the emerging County Plan for a high standard running track and that Marlay Park would be an ideal venue for such a facility.	A110	5	The contents of this submission will be considered during the preparation of the Draft Plan.
x) Submission states that existing leisure facilities are under pressure and new facilities would	A112		The forthcoming County Development Plan will continue to support leisure facilities and library development. The other issues raised in this submission are operational matters.

Key Issue Section 6: Community Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
<p>greatly improve resources within the County. The new library will provide some new space, however similar facilities should be spread throughout the County.</p>			
<p>6.1.5 Schools / Third & Fourth Level Education Facilities</p>			
<p>i) Submission requests that the new Development Plan continues to support the aims of the ongoing development of UCD by providing a range of uses on campus and fostering strong links between education, community and the business sector within the County.</p> <p>Submission further states that it is anticipated that an increase of circa 25% of on-campus student accommodation will be required at UCD together with off campus accommodation and this need should be reflected in the next plan as it is presently under policy RES11, however it is suggested that the one pedestrian kilometre is removed due to the significant uptake of cycling – the present maximum distance can be restrictive and a 3km distance would be more reasonable.</p>	<p>A037</p>	<p>1 2</p>	<p>Section 8.3.5 of the County Development Plan 2010-2016 recognises the significant role that UCD plays in the County with regards to education, research and employment. The Council actively engages and cooperates with UCD in relation to the continuing development of the campus.</p> <p>The forthcoming County Development Plan will continue to support development at UCD and will examine policies and guidance in relation to on and off campus developments including provisions for the realization of the UCD Master Plan and provision of adequate Student accommodation.</p>
<p>ii) Submission provides the information used to calculate educational infrastructural requirements, indicates guidance documents for sites suitable for educational provision, asks the Council to note the memorandum of understanding on the acquisition</p>	<p>A076</p>		<p>The Council will continue to co-operate with the Department of Education and Skills (DES) with regards to the identification of sites for new schools within the County in accordance with the 'Memorandum of Understanding Between the Department of Education and Skills and the County and City Managers' Association on the acquisition of sites for planning purposes'.</p>

Key Issue Section 6: Community Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
<p>of sites for schools and asks that all existing educational site zonings and reservations be retained in the new County Development Plan.</p>			<p>The forthcoming County Development Plan will continue to support the development of schools within the County and will examine specific policies and guidance in relation to schools having regard to 'The Provision of Schools and the Planning System - A Code of Practice for Planning Authorities, the Department of Education and Science, and the Department of the Environment, Heritage and Local Government, 2008'.</p>
<p>iii) Submission requests that students are supported within the County – student housing promoted and promotion of training locally within institutions.</p>	A112		<p>The forthcoming County Development Plan will continue to support student facilities and training opportunities within the County.</p> <p>Policies and objectives will be provided in relation to the provision of student housing.</p>
<p>iv) Submission states that the current number of schools within the County seems to be inadequate. Provision of new schools should be a priority given the rising population and in order to avoid of overcrowding in existing schools.</p>	A112		<p>As per the Chief Executive's response under 6.1.5ii) above, the Council will continue to support the development of schools within the County in cooperation with Department of Education and Skills.</p> <p>The DES has a GIS based data set linked to child benefit year-on-year which is able to identify areas where demand for school places and subsequent school development is required and can prioritise development as required.</p>
<p>v) Submission requests that facilities within existing schools be opened up for use by the wider community and actively encouraged (such as the case with New Park School) but not to the detriment to students of the school.</p>	A112		<p>Public access to facilities provided within existing school sites cannot be facilitated under the provisions of the County Development Plan, however dual use of new school facilities can be encouraged and policies / objectives in this regard will be examined in the preparation of the Draft Development Plan.</p> <p>It should be noted that the 'Memorandum of Understanding Between the Department of Education and Skills and the County and City Managers' Association on the acquisition of sites for planning purposes' states that 'the Department and Local Authorities view the provision of schools as a partnership between them in the provision of facilities in a community'.</p>

Key Issue Section 6: Community Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
6.1.6 Health Care Facilities			
i) Submission requests that communities are developed having regard to health impacts given that obesity is a growing problem in Ireland. The development plan should implement policies included in 'Building Young Hearts' report recently published, in particular fast food outlet development should be avoided in areas close to schools.	A017		Policies and guidance set out within the Development Plan encourage increased usage of public transport, walking and cycling and aims to reduce dependence on the private car. The Plan also encourages a mix of uses within walking and/or cycling distance of residential areas. In relation to fast food restaurant locations proximate to schools should be considered in the context of combating childhood obesity, it is agreed that land use plans in general are not a panacea and it is unreasonable to expect that Planning Authorities can somehow take responsibility for the lifestyle choice of individuals.
ii) Submission requests that the development plan encourages the development of Health Service providers within Cornelscourt Village.	A069	6 7	The contents of this submission are noted and will be considered during the preparation of the Draft Plan. However the provision of health services is primarily the responsibility of the HSE in conjunction with local healthcare practitioners.
6.1.7 Childcare Facilities			
i) Submission relates to the provision of childcare facilities within the County specifically requesting the following: <ul style="list-style-type: none"> • Childcare definitions and required floor space per child are updated in line with current guidelines. • Population increase in DLR Area will inevitably lead to an increased demand for childcare places, this need must be identified at the 	A027		The Childcare definitions and requirements will be updated in line with current National Guidelines and Policies during the preparation of the Draft Plan. The forthcoming County Development Plan will continue to support childcare/pre-school development within the County and specific contents of this submission will be examined in the preparation of the Draft Plan.

Key Issue Section 6: Community Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
<p>earliest stage of the planning process.</p> <ul style="list-style-type: none"> • There has been significant investment and expansion of early years and school age childcare in the County and in order to avoid displacement and duplication of such facilities, a policy should be in place to take account of the geographical distribution of services and the demographic profile of an area when a new facility is proposed. • Any policy stated within the Development Plan should take account of updated childcare legislation and remove reference to outdate/replaced guidelines etc. • Similar guidelines to those included in Dublin City Development Plan are included in the Dún Laoghaire County Development Plan. 			
ii) Submission requests that the childcare guidelines for Local Authorities are used as a guide only and that a flexible application of childcare requirement is applied to all new developments. The provision of a crèche in developments of 75 units or more in all cases has resulted in a high vacancy rate in crèches where there is insufficient demand.	A116		<p>The forthcoming County Development Plan will continue to support childcare/pre-school development within the County.</p> <p>The specific contents of this submission will be examined during the preparation of the Draft Plan.</p>
6.1.8 General			
i) Submission requests that the Council actively lobbies for greater Garda resources in the Shankill Area to help deter/reduce crime and there should be CCTV installed to reduce crime, anti-social	A058 A059	10	<p>The forthcoming County Development Plan will continue to promote and deliver safe living environments throughout the County and matters raised within this submission will be examined in conjunction with the Joint Policing Committee during the preparation of the Draft Plan.</p>

Key Issue Section 6: Community Strategy	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
behavior and fly tipping in the area.			However the points raised in this submission are, in the main, operational issues primarily under the control of An Garda Síochána and are not a strategic Development Plan matter. Likewise the issue of fly-tipping is an operational management issue to be addressed by the Councils Environmental Section.
6.2 Cultural & Arts Development			
i) Submission request that an objective is included in the Plan to include a Diaspora Centre in the new library with phase 1 being provided between the library and the Mariners Church, rather than providing a new building.	A016	3	SLO 16 of the current County Development Plan encourages the redevelopment of the Carlisle Pier and the redevelopment should integrate with the immediate built environment, should provide improved accessibility between the development and Dún Laoghaire town centre and should commemorate the unique heritage and history of the Pier as a gateway for the Irish Diaspora. It is envisaged that the forthcoming Draft Plan will continue to encourage the provision of a Diaspora Centre in Dún Laoghaire.

SECTION 7
PRINCIPLES OF DEVELOPMENT

Key Issue Section 7: Principles of Development	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
7.1 Urban Design, Building Height & Place Making			
i) Submission states that Tivoli Road could benefit from urban realm improvements – street lighting/pavement/tree planting/possible one-way traffic system.	A013		The contents of the submission are noted. The County Development Plan review will allow for the shaping of County-wide policy on the issue of public realm enhancement and upgrade schemes.
ii) Plan should include a Village Design Statement, which enable local residents/business to participate positively in the planning process and be 'Community Led'.	A015		'Village Design Statements' (VDS) are an initiative of The Heritage Council. The VDS Programme seeks to provide <i>"an opportunity for meaningful public participation in the Irish planning system"</i> for local communities, with a particular emphasis placed on the conservation and management of local heritage. The inclusion of policies in relation to VDS and to the County Villages will be examined during the preparation of the Draft Plan.
iii) Submission from Cornelscourt Residents & Business Association refers to the village and notes that any new development in Cornelscourt should take account of existing building height and character. Quality street furniture/finishes should be taken into account. The County Development Plan should provide for the completion of the Cornelscourt Village Improvement Scheme.	A069		The contents of the submission are noted. Development standards in relation to building height, character and finishes will be considered as part of the Development Plan Review process. A Specific Local Objective of the current County Development Plan is <i>"To progress the implementation of the Village Improvement Scheme for Cornelscourt Village."</i> The Review of the County Development Plan will allow for the assessment of such schemes. As only limited resources are now available to expedite Village Improvement Schemes, projects will be brought forward on a prioritised basis subject to availability of resources.
iv) No more apartments should be built – 3-4 bed houses for families.	A092		The County Development Plan will include policies on dwelling mix that will generally seek to encourage the establishment of sustainable residential communities by ensuring the provision of a wide variety of housing and apartment types, sizes and tenures. It is notable that the recently published Housing Agency report, "Housing Supply Requirements in Ireland's Urban Settlements 2014 – 2018", forecasts that 57% of all new households formed in the Dublin Region over the Study period will be for one and two person households, while three person households will account for a further 18%. Therefore, three quarters of all

Key Issue Section 7: Principles of Development	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
			<p>households formed over this period will be for three people or fewer.</p> <p>A County Development Plan policy that excludes all dwelling types other than 3-4 bedroom houses would not provide a suitable housing stock for the County's diverse range of household types.</p>
<p>v) Submission refers to Ballybrack/Killiney area - Since Ballybrack Village Improvement Scheme, the area has received little attention, with infrastructural upgrading focussing on larger areas. Also notes that housing densities could be increased, particularly near public transport corridors</p>	<p>A101</p>		<p>The review of the County Development Plan will include consideration of proposals for urban realm enhancements in different parts of the County. Significant capital expenditure was expended on the Ballybrack Village Improvement Scheme over two financial years between 2002 and 2006.</p>
<p>vi) Submission states that, notwithstanding national standards re: density/dwelling size, the Plan should be 'pragmatic' when considering current 'market demands'.</p> <p>There should be more flexibility for building height in relation to infill sites – impacts can be assessed without regard to unnecessarily rigid standards.</p>	<p>A116</p>		<p>The forthcoming County Development Plan must have regard to national policy guidance on residential density as set out in Sustainable Residential Development in Urban Areas-Guidelines for Planning Authorities (2009). While it is possible to review density standards in the context of these Guidelines, the Chief Executive would caution against any course of action that would lead to an abandonment of the principles of sustainable development in favour of dubious short-term market demands.</p> <p>The Building Heights Strategy, which was adopted as a Variation to the County Development Plan in 2011 will be reviewed as part of the County Plan review, providing an opportunity to revisit building height standards for infill development schemes. As an aside, the Building Height Strategy does allow for some discretion – upward and downward modifiers – based on the particular characteristics of the site and seek to avoid blanket, immutable policies for particular areas.</p>

SECTION 8
NON-SPECIFIC/GENERIC ZONING OBJECTIVES

Key Issue Section 8: Non-Specific/Generic Zoning Objectives	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
8.1 Rathmichael Area/Greenbelt/Density			
<p>i) No development should be permitted above 300ft /90m contour line as was stipulated in previous County Development Plans.</p> <p>Development Plan maps should show specific permitted residential density, as was the practice in previous Plans.</p>	<p>A020 A024 A026 A028 A036 A040 A041 A054 A064 A100 A106</p>	<p>10 14</p>	<p>The existing County Development Plan contains a SLO71 stating <i>"No insensitive or large scale development shall take place above the 90 metre contour line at Rathmichael, from old Connaught Golf Course to Pucks Castle Lane – maps 10 and 14. Any proposal for development, other than development directly related to agriculture, forestry recreation or the promotion of other bona fida rural enterprise or employment activity, shall be domestic in scale appearance and function."</i></p> <p>The wording of the SLO was amended from <i>"No development"</i> in the previous 2004 Development Plan to <i>"No inappropriate development"</i> in the 2010 Plan. This amendment was introduced to acknowledge certain localised sites zoned "A" on lands above the 300 foot contour limit where sensitive infill development might be considered appropriate subject to the normal planning considerations associated with such sites. It is considered that this policy provision and the restrictive nature of the 'Objective G' Zoning affords a high level of protection to these lands. (Also refer to Section 3.1.6 i)).</p> <p>The practice of displaying density 'bands' on County Development Plan maps was based on the practice of allowing very low 'maximum' densities in unserved areas such as Rathmichael. It has not been practice to set such low maximum densities since the 1998 County Development Plan. While there are strategic water and drainage (foul and surface) infrastructure deficits in the Rathmichael area and the delivery of Luas Line B2 has been postponed, the longer term strategy for Rathmichael area would be inconsistent with a return to planning for multiple residential low-density schemes as was the case with Development Plans in the 1980's and 1990's.</p>
<p>ii) Retention of GB zoning and Luas B2 proposal are mutually exclusive – if B2 proceeds, the GB zone will be under threat from development.</p>	<p>A054</p>	<p>14</p>	<p>The submission is noted. It is acknowledged that the overall context of the Greenbelt lands may change fundamentally with the insertion of Luas Line B2 or whatever substitute public transport system might utilise the corridor as a replacement for Line B2. It is also the case</p>

Key Issue Section 8: Non-Specific/Generic Zoning Objectives	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
			that the infrastructure necessary to serve this part of the County (both public transport, water supply and foul drainage) may not be delivered within the forthcoming Development Plan cycle, depending on resources. The rezoning of any additional lands for development within the existing Greenbelt 'Objective GB' lands would have to derive from an evidence-based assessment of residential land supply, as part of the formulation of the Core Strategy – as noted previously in the Report, the key metrics informing the existing Core Strategy have not altered significantly and any recommendation on additional zoning in the forthcoming Plan will reflect this.
iii) Requests retention of residential zoning at site in Rathmichael area.	A060	10 14	The content of the submission is noted.
8.2 Land Use Zoning Objectives			
i) A 'more nuanced' zoning scheme is required – too broad at present.	A008		The land use zoning 'matrix' of permissible uses will be assessed as part of the County Development Plan Review. The submission will be considered as part of this review.
ii) A SLO is proposed to support 'Pembroke District' in the Dundrum Shopping Centre, as centre of restaurant/ leisure evening uses – with priority given to commercial uses over residential.	A066	1/5	The contents of the submission are noted and will be considered as part of the assessment of zoning policies applicable to Dundrum as a Major Town Centre.
iii) None of the County Development Plans 12 no. land use zonings are mixed use - they generally allow for one primary use, with some ancillary/subsidiary uses. Instance given of Residential zone A, with restrictions on size of convenience stores and/or offices within this zone. A new 'mixed use' zoning category should be	A080		The Chief Executive does not agree with the substance of the submission. There are three separate mixed-use zones in the County – Major Town Centre/District Centre/Neighbourhood Centre – which allow for a broad and diverse range of uses. Many of the other land uses, such as Residential, as referred to in the submission, actually have a broad range of uses 'Open for Consideration'.

Key Issue Section 8: Non-Specific/Generic Zoning Objectives	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
<p>created for the development of 'key sites'.</p>			
<p>iv) Submission concerns County Development Plan policy in relation to crematoria. Growth in demand for crematorium services – none in DLR. Crematoria are 'Open for Consideration' in Zone F 'Open Space', but not at all in Zone B 'Agriculture'- even though 'Cemetery' and 'Place of Public Worship' are Permitted in Principle – this is an anomaly. Crematorium should be 'Open for consideration' in Zone B and possibly other zones.</p>	<p>A088</p>		<p>The content of the submission is noted – the County Development Plan Review will include a critical reassessment of all of the land use zoning objectives and the various land uses permitted therein.</p>
<p>v) A submission on behalf of the Dún Laoghaire Harbour Company addresses the land use Zoning Objective 'W' (Waterfront and Harbour related Uses) and notes that 'Shop - Specialist' defined as a 'single retail unit which sells specialised merchandise' is Open for Consideration in the zone. It is stated that one possible interpretation could be that only one such shop would be permissible. The County Development Plan should specifically promote the development of multiple such units.</p> <p>Also, within the Zoning Objective 'W' zone, 'Leisure Facility' is not permitted. This appears to be "an anomaly."</p>	<p>A099</p>	<p>3</p>	<p>The land use zoning 'matrix' of permissible uses will be assessed as part of the County Development Plan Review. The submission will be considered as part of this review.</p> <p>However it should be noted that any proposed uses in the Harbour area would need to be complementary to the adjacent MTC zoning and uses and should not compete with same.</p>
<p>vi) Retain G and B Land use zonings in the Ballycorus Valley area where walkers/cyclists tourists etc enjoy this beautiful scenery.</p>	<p>A103</p>		<p>The content of the submission is noted. It is current Council policy to "<i>conserve and enhance</i>" existing High Amenity zones (Policy LHB2) and any reassessment of zoning designation in these areas would have to be considered with this over-arching principle in mind.</p>

Key Issue Section 8: Non-Specific/Generic Zoning Objectives	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
<p>vii) Submission from 'Kentucky Fried Chicken' UK and Ireland concerns policy in relation to fast food restaurants/takeaways.</p> <p>Submission highlights economic contribution of drive thru 'restaurants'. States that it is unreasonable that takeaways are singled out for restrictive policies in County Development Plan. There is no specific definition for 'Fast Food/Takeaway'.</p> <p>'Drive thru restaurant' should be included as a typology/land use category in the County Development Plan.</p> <p>Submission queries the use of the planning system to regulate in the area of obesity/healthy eating, noting that a KFC 'BBQ Rancher Burger' contains approximately 400 calories - <i>"lower than many high street sandwiches"</i>.</p> <p>LAP Guidelines advice on location of fast food takeaways proximate to schools etc should not be adhered to in County Development Plan – issue more complex than land use. 'No Fry Zone' around schools of 1.5km for example would almost prohibit any future takeaway development such is the spatial distribution of schools across the County.</p>	<p>A107</p>		<p>Policy on fast food restaurants/takeaways in successive County Development Plans has generally considered among other things, the potential effect of noise, general disturbance, hours of operation, litter and fumes on the amenities of nearby residents or adjoining commercial activities. Rather than 'unfairly singling out' fast food restaurants/takeaways, it is considered entirely reasonable to take into account the particular characteristics of this commercial use when framing policy in this regard.</p> <p>Takeaway restaurants are generally defined in the Planning and Development Regulations as uses <i>"for the sale of hot food for consumption off the premises"</i> and this general description is considered to be a satisfactory 'working' definition in planning terms. The issue of creating a separate use class for 'drive-thru restaurant' could be considered as part of the Development Plan Review process.</p> <p>In relation to suggestion in the Local Area Plan Guidelines that fast food restaurant location proximate to schools should be considered in the context of combating childhood obesity, it is agreed that land use plans in general are not a panacea and it is unreasonable to expect that Planning Authorities can somehow take responsibility for the lifestyle choice of individuals.</p>
<p>viii) Range of uses 'permitted' under Zone A is too</p>	<p>A116</p>		<p>As stated above, there is a very wide range of uses which are 'Open for Consideration' in the</p>

Key Issue	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
<p>Section 8: Non-Specific/Generic Zoning Objectives</p>			
<p>restrictive.</p>			<p>Objective 'A' Residential land use zone. This approach allows for consideration of many uses in residential areas, while retaining the primacy of the residential use and recognising the protection of residential amenities as the key consideration.</p>
<p>8.3 Miscellaneous</p>			
<p>i) Green areas surrounding Marsham Court should be protected.</p>	<p>A018</p>	<p>2 6</p>	<p>The contents of the submission will be considered as part of the review of the County Development Plan.</p>

SECTION 9
DEVELOPMENT MANAGEMENT

Key Issue Section 9: Development Management	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
9.1 General			
i) Submission requests that the written statement should include measures to minimize noise as an objective.	A041		The Dublin Agglomeration Noise Action Plan 2013-2018 will be referenced during the preparation of the Draft Plan.
ii) Submission discusses the parameters for exempted development for domestic extensions.	A056		These issues are not considered to be pertinent to the County Development Plan as they are statutorily governed by the Planning and Development Regulations 2001, as amended, and Section 5 of the Planning and Development Act 2000, as amended.
iii) There may be a need to improve private and public open space standards depending on the expected population of a new development and open space should be provided where there is insufficient provision locally.	A112		The public and private open space standards for the forthcoming Draft Plan will be reviewed to consider their use and value in relation to proposed developments. One of the central themes in the review will be to base the amount of open space provision on the expected population as suggested in this submission. It may be the case that only new development of a certain size will be capable of providing open space to supplement insufficient local provision. For example the new development at Honeypark has provided a local park for the surrounding area.
iv) Submission seeks the inclusion of a specific use class and supporting policy in relation to the 'assisted living' concept.	A114		<p>The Chief Executive fully recognizes the importance of the 'assisted living' concept and is very mindful of the ageing demographic of the County. The average age of persons in the County is one of the highest in the Country.</p> <p>Policy RES9 'Housing for the Elderly' in the existing County Development Plan currently supports the concept for independent living for older people.</p> <p>In this regard it is considered that the contents of this submission have merit and will be considered during the preparation of the Draft Plan.</p>
v) Submission seeks amendments/additions to the development management section of the Draft Plan included planning enforcement, telecommunications, wind energy, hydro energy,	A117		The contents of this submission are noted and will be considered during the preparation of the Draft Plan.

Key Issue Section 9: Development Management	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
extractive, rights-of-way, fencing and golf courses.			
9.2 Land Use Zoning Objectives			
i) Submission indicates that zoning objective A in the current plan is too vague and open to interpretation with regard to housing density and the graveyard proposal in Ballycorus.	A020 A028 A036 A040 A041 A054	9 10 14	The existing County Development Plan is very specific in the uses that may be permitted or are open for consideration in areas zoned with the land use objective A. It is considered that this specificity will be continued in the Draft Plan.
ii) Submission requests that the 'F' Zoning should be amended to include childcare facilities as being permitted in principle rather than only open for consideration.	A027		The contents of this submission are noted and will be considered during the preparation of the Draft Plan.
iii) Submission requests that a specific objective be included to facilitate a medical centre/primary health care centre in the 'W' zoning objective. Also requests that the Draft Plan specifically promotes the development of multiple units for specialist goods for the tourist market in the Harbour area.	A099	3	It is considered that medical centre uses may be better suited to the adjoining and extensive zoning of Major Town Centre in Dún Laoghaire. Any uses proposed in the Harbour area would need to be complementary to the adjacent Major Town Centre zoning and uses and should not compete with same.

Key Issue	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
Section 9: Development Management			
9.3 Education (See Section 6.1.5)			
9.4 Childcare Facilities (See Section 6.1.7)			

SECTION 10
STRATEGIC ENVIRONMENTAL ASSESSMENT & APPROPRIATE ASSESSMENT

Key Issue	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
<p>Section 10: Strategic Environmental Assessment & Appropriate Assessment</p>			
<p>10.1 Strategic Environmental Assessment</p>			
<p>i) Submission stresses the importance of the SEA process.</p> <p>Submission requests that the Strategic Environmental Objectives in the SEA cover:</p> <ul style="list-style-type: none"> • Habitats and species both within and outside designated sites. • Protected species such as crayfish, salmon and lamprey. <p>Baseline study for the SEA should consult NPWS and the data of the National Biodiversity Data Centre.</p> <p>SEA needs to take account of new environmental legislation.</p>	<p>A007 A017 A063</p>		<p>The Council is aware of the importance of the SEA process and the need for this process to be ongoing and iterative and to feed into the review of the Development Plan at every stage. The Council has already consulted with the EPA and NPWS prior to embarking on the review process.</p>
<p>10.2 Appropriate Assessment</p>			
<p>i) Submission requests that all relevant plans and infrastructure projects which have the potential to</p>	<p>A007</p>		<p>The Plan will be subject to AA screening.</p>

Key Issue Section 10: Strategic Environmental Assessment & Appropriate Assessment	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
impact on Natura 2000 sites either individually or in combination with other plans and projects be assessed under the provisions of the Habitats Assessment Directive			
ii) Draft Plan should be screened for Appropriate Assessment.	A063		The Plan will be subject to AA screening.
iii) The rule of thumb often used is to include all Natura 2000 sites within a distance of 15km. Suggest that in some instances - where there are hydrological connections - a whole river catchment or a groundwater aquifer may need to be included.	A063		The contents of this submission have been noted.
iv) Submission requests that the AA procedure take place in consultation with all the teams working on the draft plan and the SEA as each process can help inform the other to ensure that the objectives and policies in the draft plan will have no significant effects on any Natura 2000 sites.	A063		The Development Plan Team are aware that there is a need for each process – be it the drafting of the development plan, the AA or the SEA - to be working together and informing one another so that the process will be an iterative one thus ensuring that the objectives and policies in the Draft Plan will have no significant effects on any Natura 2000 sites.
v) AA should examine the effects of policies, objectives and any indicative maps or zonings as well as cumulative impacts with other plans and projects both within and outside the plan area.	A063		This is agreed.

SECTION 11
MISCELLANEOUS

Key Issue Section 11: Miscellaneous	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
11.1 Dún Laoghaire Harbour			
11.1.1 General			
i) Submission provides details from the ICOMOS charter on Managing Tourism in Places of Heritage Significance.	A006	3	The contents of this submission have been noted.
ii) Submission contends that the Harbour is underused.	A077	3	The contents of this submission have been noted.
iii) Submission contends many leisure and bathing uses require rationalisation and improvement.	A077	3	<p>The Council is well advanced in preparing a proposal for interim works at the Baths site. These works include:</p> <ul style="list-style-type: none"> • the renovation and re-opening of pavilion building to provide a public café/gallery, toilets, terrace area and artists studios • the creation of a new route with associated landscaping to connect the walkway at Newtownsmith to both the East Pier and the Peoples Park • enhanced facilities for swimming and improved access to the waters edge e.g. ramps, steps and renovation of the existing bandstand and • the creation of a small jetty in line with the existing structure and the provision of a changing area.
iv) Submission states that Crofton Road/Queens Road and the railway forms a barrier between the Harbour and the town.	A077	3	Successive plans have recognised that the railway cutting and roadways sever the town from the Harbour. Bridging over the railway line in some areas has had a hugely positive effect on improving connectivity between the harbour and the Town Centre.
v) Sailing clubs have concerns relating to the suitability of a Diaspora centre for the Carlisle Pier.	A077		The existing Dún Laoghaire-Rathdown County Development Plan contains SLO No. 16 on Map 3 relating to the Carlisle Pier as follows;

Key Issue Section 11: Miscellaneous	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
			<p><i>"To retain the Carlisle Pier structure and to encourage redevelopment on it that will incorporate uses that will bring significant cultural, social, recreational and economic benefits to Dún Laoghaire-Rathdown and must provide for a high degree of public accessibility and permeability, with walkways, viewing areas and public spaces throughout. The redevelopment should integrate with the immediate built environment, should provide improved accessibility between the development and Dún Laoghaire town centre and should commemorate the unique heritage and history of the Pier as a gateway for the Irish Diaspora."</i></p> <p>Any planning application for redevelopment of the Carlisle Pier will be dealt with through the appropriate Development Management mechanism.</p>
vi) Submission argues that any commercial shipping proposals should be required to ensure that there is no material detrimental impact upon water-based amenities.	A081	3	The impact of any commercial shipping proposals on water based amenities would be assessed by the competent authority dealing with any such proposals.
vii) Submission requests that the provision of the Dún Laoghaire Harbour Master Plan be incorporated into the County Development Plan	A099	3	<p>The Harbour Masterplan is a completely separate and non-statutory document prepared and adopted by the Dún Laoghaire Harbour Company following extensive consultation with the general public and other stakeholder interests.</p> <p>Dún Laoghaire Harbour Authority have always accepted the non-statutory status of the Masterplan.</p> <p>DLR as a Planning Authority have a regulatory function in relation to development in the Harbour area.</p>
viii) Submission states that mixed uses as proposed in the Dún Laoghaire Master Plan will allow for passive surveillance and improve the urban realm.	A099	3	The contents of this submission have been noted.
ix) Zoning objective W does not allow for a leisure facility. Submission requests an SLO to include this use.	A099	3	The National Ports Policy 2013 has implications for the Dún Laoghaire Harbour area. In this Policy, Dún Laoghaire is identified as a Port of Regional Significance, and in this regard will retain a role as a regional freight distribution hub, but with an increasingly important role in

Key Issue Section 11: Miscellaneous	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
			the areas of marine leisure and tourism. During the drafting of the County Development Plan (or any future process for considering and formulating an overall strategy and vision for the Dún Laoghaire Town Centre and Environs area) further consideration may be given to the role of marine tourism associated with the Harbour area.
x) Submission considers that harbour can accommodate 2-3 star budget hotels.	A099	3	Ultimately, the provision of guesthouses / hotels is a matter for private individuals and commercial operators. During the drafting of the County Development Plan (or any future process for considering and formulating an overall strategy and vision for the Dún Laoghaire Town Centre and Environs area), however, consideration may be given to identifying particular areas or locations where such uses may be desirable / appropriate.
xi) Submission questions the need for a floating pool/urban beach in Dún Laoghaire Harbour.	A113	3	There is a current planning application Register Reference D13A/0682 for a new urban beach and floating pool facility in Dún Laoghaire Harbour. This issue is being dealt with through the appropriate Development Management mechanism. No decision has yet been issued.
xii) Bay should be kept free of inappropriate industrialisation.	A113	3	A sizeable proportion of Dublin Bay that falls within the jurisdiction of DLR is protected under various environmental legislations which would have a bearing on any major industrial proposals.
11.1.2 Cruise Liner Berth			
i) Submission opposes development of the cruise liner terminal as it will divide the historic harbour into two harbours and prevent the waterways from racing on their historic courses which would represent a serious loss of yachting heritage, it will be visually intrusive, irreversible, not commercially viable and would represent a loss of recreational amenity. In addition the existing infrastructure could not support such a development.	A006	3	The facilitation of cruise ship activity to Dún Laoghaire Harbour is promoted by Dún Laoghaire Harbour Company who is currently responsible for the operation of the Harbour and its immediate environs.

Key Issue Section 11: Miscellaneous	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
ii) Sailing clubs have concerns relating to some of the proposals of the Harbour Master Plan including the proposed pier and terminal for large cruise ships.	A077	3	The facilitation of cruise ship activity to Dún Laoghaire Harbour is promoted by Dún Laoghaire Harbour Company who is currently responsible for the operation of the Harbour and its immediate environs.
iii) Submission contends that the development of a cruise liner terminal will bring in a considerable number of overseas visitors with many spin off benefits. Submission requests the inclusion of the cruise liner terminal as an SLO.	A099	3	The facilitation of cruise ship activity to Dún Laoghaire Harbour is promoted by Dún Laoghaire Harbour Company who is currently responsible for the operation of the Harbour and its immediate environs.
11.1.3 Sailing			
i) Submission supplies details of the water wags club past and present.	A006	3	The contents of this submission have been noted.
ii) Submission states that new plan should promote youth sailing in the Harbour. Submission states that new plan should encourage sailing in the harbour and the development of spin off employment. Submission requests that sailing training is encouraged in schools; the harbour is the ideal place to teach students how to sail and survive at sea.	A016	3	Sports development and recreation will be encouraged through a series of objectives/policies. The Council will investigate the possibility of including a specific policy in relation to water based sports. Providing specific training within local schools is, however, a matter for each school and cannot be provided for within the County Development Plan.
iii) Submission contends that there is significant scope for the further development of sailing in Dún Laoghaire and that sailing should be protected by policies in the plan.	A077	3	Historically, Dún Laoghaire Harbour was an important freight port but this function has changed dramatically in recent times. The Harbour is now primarily used as a seasonal passenger port and for recreational sailing. During the drafting of the County Development Plan (or any future process for considering and formulating an overall strategy and vision for

Key Issue Section 11: Miscellaneous	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
			<p>the Dún Laoghaire Town Centre and Environs area), however, consideration may be given to the need to protect the harbour for harbour related uses but also in the future to attract other activities and uses that cater for a broader spectrum of the population.</p> <p>It is agreed that tourism and leisure pursuits and the development of improved facilities in relation to the maritime environment will form an important part of the County Development Plan or any future process for considering and formulating an overall strategy and vision for the Dún Laoghaire Town Centre and Environs area.</p>
<p>iv) Submission states that Dún Laoghaire Harbour offers world class leisure sailing resource and is among the best locations to handle the fast growing spectator friendly forms of sailing as the outer piers allow for multiple viewing points. In this regard, policies recognizing and supporting water based recreational uses should be provided within the County Development Plan.</p> <p>Submission outlines a number of factors that contribute towards Dún Laoghaire Harbour being an excellent sailing arena. Factors include the shelter provided by the harbour, the prevailing south westerly's and proximity to Dún Laoghaire town. Submission considers that all the clubs are operating to capacity but that there is overall considerable growth potential for sailing as a sport in Ireland.</p>	<p>A077</p>	<p>3</p>	<p>Sports development and recreation will be encouraged through a series of objectives/policies. The Council will investigate the possibility of including a specific policy in relation to water based sports.</p>

Key Issue Section 11: Miscellaneous	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
11.2 Rights-of-Way			
11.2.1 General			
i) There is a need to sustain pedestrian rights-of-way.	A056		The contents of this submission have been noted.
ii) Submission requests that Local Authorities signpost rights-of-way.	A117		An objective of the current Heritage Plan is to carry out an interpretation Plan for the County. This plan will deal with the issue of heritage and recreational signage in the County. There is no specific time frame as yet in relation to this plan.
iii) Submission requests that rights-of-way should be identified before any development proposed in relation to forestry, wind energy, golf courses and telecommunications.	A117		In the assessment of any planning applications for development existing rights-of-way are taken into account.
iv) Submission requests that all greenways be made rights-of-way.	A117		The Council is proposing to prepare a Green Infrastructure Strategy for the County that will include greenways. It is anticipated that the Strategy will be embedded in the County Development Plan.
v) Submission requests that an additional objective is included to facilitate the creation of public rights-of-way to sites of archaeological and historic interest and to National Monuments in State and Local Authority ownership and in other cases, routes will be acquired by agreement with landowners or by way of compulsory powers.	A117		<p>Many of the issues addressed in this submission are already covered by policies and objectives in the current Development Plan including AH1, AH2, AH3, AH4, AH5 and AH6 which will be retained in the preparation of the Draft Plan.</p> <p>The Council has no control over Archaeological Monuments and/or sites in private ownership and cannot, therefore, commit to improving public accessibility to same.</p> <p>A balance must be struck between access and protection of the heritage asset which can be</p>

Key Issue Section 11: Miscellaneous	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
			compromised by uncontrolled access and associated problems. Any proposals must have regard to the Department of Arts, Heritage and the Gaeltacht publication <i>"Access: Improving the Accessibility of Historic Buildings and Places"</i>
11.2.2 Inclusion of Rights-of-Way			
<p>i) Submission requests inclusion of the following Rights-of-Way:</p> <ul style="list-style-type: none"> • Reinstate ROW between Sharavogue estate and Marlborough Road. • Knocknaree Park to Knocknaree Road. • Rail Viaduct transiting Cherrywood Road linking Loughlinstown Hospital complex with Cherrywood Science and Technology Park and LUAS. • Section of Loreto Avenue, Dalkey linking Convent Road with the laneway to the foreshore and Lady's Well (latter lane is currently designated as a ROW). • Farm track linking Ballyman Road, near its junction with Ballyman Lane, with St Kevin's Church and Holy Well an early Christian site and National Monument where access has been blocked by the landowner. • Pathway linking Lehaunstown Lane along the line of the Luas to the underpass at Glen Druid and proceeding along the line of the river valley to the Brennanstown Portal Tomb and Glen Druid House. • Local Authority should be proactive in 	<p>A011 A030 A048 A067 A117</p>	<p>7 4 10 14</p>	<p>Dún Laoghaire-Rathdown has a strong track record in displaying rights-of-way on the County Development Plan maps and considerable work was done as far back as the 2004 – 2010 Plan on including rights-of-way. However, in making a right-of-way the burden of proof rests with the Local Authority and, therefore, sufficient supporting evidence is required in order to allow the Council make the decision on whether a right-of-way should or should not be made. The ultimate decider on a right-of-way is the Circuit Court and a number of the rights-of-way included in the 2004 County Development Plan have had to be removed on foot of Circuit Court cases.</p> <p>It should be noted that the Development Plan does not purport to include every right-of-way in the County. Section 14 (7) (a) of the Planning and Development Act 2000 – 2010 states that "Nothing in this section shall effect the existence or validity of any public right-of-way which is not included in the development plan" which can be interpreted to mean that rights-of-way exist even when they are not included in the County Development Plan.</p> <p>It is considered that none of the submissions received provide the level of evidence that is required. The Council would need to gather this evidence, undertake research and establish proofs that may be subject to discussion and dispute (between users and landowners). The Council would require, at a minimum, the services of a local historian and an experienced legal Counsel to take a view as to whether evidence gathered would meet the threshold established by the Supreme Court in the Lissadell case. This would be a time consuming and resource intensive process that needs to be done correctly. In conclusion it is considered that there is not sufficient time in this Development Plan review process to adequately gather the evidence required to include these purported additional rights-of-way in the Draft Plan.</p>

Key Issue Section 11: Miscellaneous	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
designating new rights-of-way by way of a Variation to the County Development Plan.			Recommendation: To avoid making a premature decision which may give rise to judicial questioning it is recommended that the list of purported additional rights-of-way be investigated during the lifetime of the new Plan 2016 - 2022 and that also the provision of Section 206 of the Planning and Development Act, which allows for creation of a right-of-way by means of agreement with the landowners consent, be investigated thus avoiding litigation. The device of using agreed 'recreational routes' as was done in the 2010 – 2016 plan should also be investigated.
ii) Submission requests inclusion of the following Right-of-Way - Knocknaree Road to Torca Road.	A011	4	There is an existing ROW shown on the County Development Plan Map No 4. showing Knocknaree Road to Torca Park. No further action is required.
iii) Submission requests inclusion of the following Rights-of-Way: <ul style="list-style-type: none"> • Killiney Hill Road (opposite Rose Cottage) to Marino Avenue Killiney Hill Road (opposite Rose Cottage) to Marino Avenue West. • Marino Avenue West and the Coast Road. 	A056	7	There is an existing right-of-way shown at this location on County Development Plan Map No.7. No further action is required.
iv) Submission requests inclusion of the following Rights-of-Way - Path northwards across Roches Hill Killiney from the end of Glenalua Road and linking with Claremont Road.	A067	7	There is an existing ROW shown on the County Development Plan Map No 7 showing a link across Roches Hill connecting Glenalua Road to Claremont Road, no further action is required.
v) Submission requests inclusion of the following Rights-of-Way - Farm track linking Bishop's Lane Kiltiernan with the Kiltiernan Dolmen, a renowned National Monument, currently inaccessible.	A067	9	There is a legal history relating to the ROW running from Bishop's Lane Kiltiernan to the Kiltiernan Dolmen. The Circuit Court made a declaration that a public right-of-way does not exist, from Bishop's Lane to "Druid's Altar" via Kiltiernan Abbey and the ROW was subsequently removed from the County Development Plan.
vi) Submission requests inclusion of the following Rights-of-Way - Pathway along the perimeter of the development site at Kiltiernan Sports Hotel providing a new and safer link for the Dublin Mountain Way linking the Scalp with Ballybetagh	A067	13	There is an existing ROW in the County Development Plan at the Kiltiernan Sports Hotel although the Dublin Mountain Partnership (DMP) are seeking to locate the DMP walking route at another location which falls within the jurisdiction of Wicklow County Council. DLRCC are aware that DMP wish to provide this new and safer link and will continue to monitor events between DMP and Wicklow County Council.

Key Issue	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
townland and Glencullen.			
11.2.3 Rights-of-Way that are blocked or in disrepair			
i) Submissions raised issues with regard to ROW which have been blocked or fallen into disuse as follows: <ul style="list-style-type: none"> • ROW at Sorrento Terrace has been blocked. • Continuation of Rathmichael Lane from its junction with Rathmichael Road and leading to Bride's Glen. • ROW from Lehaunstown Lane via the M50 bridge to Heronford Lane. 	A048 A067	4 10	In relation to the blocking and obstruction of rights-of-way shown in the County Development Plan the Local Authority can repair damage or remove any obstruction in accordance with Section 208 of the Planning and Development Act 2000 (as amended). It is acknowledged that it is the responsibility of the Council to maintain rights-of-way that are shown on Development Plan maps. However the ongoing maintenance of rights-of-way is an operational matter and not an issue to be addressed through the Development Plan process.
11.3 Part V and Development Levies/Contributions			
i) Section 49 scheme for Glenamuck Road/ Attenuation Ponds should be reviewed. Current levies are too high/unfair. There should be an exemption for those building on family land even if the applicant is not a native.	A012	9	The contents of the submission are noted. It is the intention of the Council to review the Section 49 Supplementary Development Contribution Scheme for Kiltiernan.

Part 3: Summary of Main Issues & Chief Executive's Opinion & Recommendations

Key Issue Section 11: Miscellaneous	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
<p>ii) In relation to student housing, Submission states that all student accommodation – not just on-campus – should be exempt from Part V obligations. Such a requirement discourages the provision of off-campus accommodation despite increasing demand for same.</p> <p>It is noted that other local authorities (including DCC) do not apply a Part V obligation to off-campus accommodation.</p>	A080		<p>The County Development Plan Review will involve the formulation of a new Housing Strategy. The Housing Strategy will set out exemptions to Part V contributions, if applicable, and the Submission will be given consideration as part of this process.</p>
<p>iii) Submission suggests that the Plan make reference to the review of the Development Contribution Scheme which will run from 2015 on.</p> <p>Some 'flexibility' requested regarding phasing of development contributions/Part V payments.</p>	A116		<p>The Development Contribution Scheme, which is prepared jointly for the four Dublin Authorities, is considered under a completely separate process and legislation to the County Development Plan Review process. The fact that the Scheme was reviewed in 2012 (shortly after its adoption) in response to rapidly changing market conditions for property development in Dublin demonstrates the willingness of the Local Authorities to maintain a Scheme which is current and consistent with market realities.</p> <p>In relation to payment arrangements for contributions/bonds etc, these matters would generally not be considered as part of a Development Plan review, which is more strategic in nature.</p>
<p>11.4 Cherrywood SDZ Planning Scheme</p>			
<p>i) Submission details various requests which relate to funding, transportation and open space and recreation.</p>	A043	7 9 10	<p>In the main this submission relates to issues already dealt with through the statutory SDZ process. The Cherrywood SDZ will be incorporated into the County Development Plan as adopted on the 29th of April 2014. The SDZ process and the subsequently adopted Planning Scheme stand-alone from the County Development Plan process and will not be altered.</p>

Part 3: Summary of Main Issues & Chief Executive's Opinion & Recommendations

Key Issue Section 11: Miscellaneous	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
11.5 Sandyford Urban Framework Plan			
i) Submission opposes the defining of development heights in terms of the number of floors. It is specifically concerned with a site contained within South County Business Park, Sandyford.	A062	6	<p>The Building Heights Strategy - which is attached as an Appendix to the existing County Development Plan - aims to reinforce the County's image as a high quality residential urban area with mixed-use town centres by encouraging higher densities and, where appropriate, taller buildings around existing and emerging new urban nodes.</p> <p>On a more micro level the Sandyford Urban Framework Plan (SUFPP) - which was adopted as a Variation to the existing County Development Plan in September 2011 – details both the permitted / developed building height limits and the proposed building height limits within Sandyford Business District. The site in question has a permitted / developed building height limit of 3 storeys with no proposed building height indicated.</p> <p>The issues raised are acknowledged. However, it should be noted that the building height limits within the SUFP were established through an extensive assessment of the location and character of the area and the existing or proposed land-use. Scale of development is defined not just by height but by plot ratio. In this regard, as the Plan is prepared there will be a need to have regard to the overall capacity of Sandyford to develop.</p>
ii) Submission voices concerns in relation to a level playing field between Sandyford and Cherrywood in terms of both Development Management standards and financial contributions.	A074	6 7 9 10	The forthcoming County Development Plan will continue to promote and advocate a consistent approach to both Development Management Standards and financial contributions throughout the entire County.

Part 3: Summary of Main Issues & Chief Executive's Opinion & Recommendations

Key Issue Section 11: Miscellaneous	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
<p>iii) Submission seeks the removal of SLO 122, which states, <i>'To facilitate the provision of an access from South County Business Park to the car parks within Central Park'</i> and the associated phasing requirement under the fourth bullet point within Policy P9, which states, <i>"No additional development or new permission will be permitted in Central Park or lands accessed from Central Park until a vehicular link is provided from Central Park to South County Business Park accessing a new entrance off Leopardstown Road"</i>.</p> <p>Submission raises strong concerns in relation to the delivery of SLO 122 being unrealistic and its potentially negatively impact on the development of the Central Park area.</p>	A084	6	The contents of this submission are noted and will be considered during the preparation of the Draft Plan.

Part 3: Summary of Main Issues & Chief Executive's Opinion & Recommendations

Key Issue Section 11: Miscellaneous	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
11.6 Other			
11.6.1 Aggregates and Quarries			
<p>i) Submission requests that certainty be established for the aggregates industry through the issuing of longer-term permissions (25 years) in order to ensure the continued operation of companies that are in compliance with their planning permissions and to enable long term investment.</p> <p>Submission requests that Planning Authorities make adequate provision within their Development Plan policies to ensure the ongoing best balance of social, economic and environmental cost, whilst ensuring that extraction and development are consistent with the principles of sustainable development.</p> <p>Submission states that planning system needs to recognise the land use requirements for the aggregate industry, determine future resource extraction points and protect these areas within County Development Plans.</p>	A005		<p>As a County Dún Laoghaire-Rathdown contains three very small scale quarries registered under section 261 of the Planning and Development Act 2000 (as amended). Only 2 of these quarries are currently operational. Standard conditions were attached to these quarries when they were registered. Any future planning applications relating to these quarries will be dealt with on a case by case basis including the length of any permission granted.</p> <p>Currently extractive industries are included as a use class which are permitted in principle on lands zoned objective B – To protect and improve rural amenity and to provide for the development of agriculture. They are also open for consideration on lands zoned Objective E – To provide for economic development and employment and lands zoned Objective G – To protect and improve high amenity areas.</p> <p>Given that the County is predominantly urban with the remaining rural area one of high scenic value it is not envisaged that the plan would propose mineral reserve areas.</p>

Part 3: Summary of Main Issues & Chief Executive's Opinion & Recommendations

Key Issue Section 11: Miscellaneous	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
ii) Submission requests that Local Authorities should give due regard to the information contained in the GSI Aggregate Potential Mapping Resource when considering policy for the potential zoning of raw material reserves.	A005		The contents of this submission have been noted.
iii) Submission welcomes the introduction of Section 261 of the Planning and Development Act and urges Planning Authorities to refer to and use the DECLG guidelines and ABP standard conditions.	A005		Standard conditions have been attached to the 3 registered quarries in accordance with the DECLG guidelines.
iv) Submission suggests that conditions imposed in relation to after use of quarries should reflect economic realities of aggregates workings. Worked out extraction sites can offer favourable opportunities for biodiversity.	A005		The contents of this submission have been noted.
v) Submission includes a detailed statement to be included in the County Development Plan.	A005		Given the lack of existing large scale aggregate industries in the County and the lack of future potential for further development it is not considered necessary to include this statement.
11.6.2 Procedure			
i) Submission from the Office of the Minister for Justice and equality Submission requests notification of any specific detail of the proposed Plan of relevance to the department.	A010		The contents of this submission have been noted.

Part 3: Summary of Main Issues & Chief Executive's Opinion & Recommendations

Key Issue Section 11: Miscellaneous	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
ii) Submission expresses concern in relation to inflexibility of the submissions process. The fact that only written submissions will be considered has implications for under-resourced individuals. Submission suggests that a series of 'town hall' style meetings be convened involving planning officials and elected representatives and that oral submission could be made.	A023		DLR have carried out a comprehensive Pre-Draft consultation process in accordance with Section 11 of the Planning and Development Act 2000 2010 (as amended). As part of this pre draft consultation process Planning Officials were available in person on six different days and evenings in each of the County's electoral wards. In providing this level of consultation Dún Laoghaire-Rathdown afforded residents and groups within the County an opportunity to meet with officials face-to-face and to discuss any issue with regard to the Development Plan and how submissions to be made. In general the feed back in relation to these Open Days was positive with individuals and groups seeking advice on how to make submissions.
iii) Submission from the Dublin Airport Authority stating that they had no comment.	A031		The contents of this submission have been noted.
iv) Submission states that adverse public reaction to the scale of the library and to the proposed Oil Rig in the Bay shows that there must be full consultation and not token consultation with communities.	A104		<p>The Central Library for Dún Laoghaire was subject to public consultation as follows;</p> <ul style="list-style-type: none"> • The plans were referred to the Dún Laoghaire Area committee on 25th May 2009 for Councillors information. • The project was put on public display in the Council offices in Dún Laoghaire and Dundrum from the 10th August 2009 to 21st September 2009 and the public had a further two weeks until 5th October 2009 to make a submission. • 33 submissions were received. These submissions were considered and summarised and a comprehensive Chief Executive's Report was prepared for the Council meeting on 9th November 2009. At this meeting the Councillors approved the proposed development under Minute Number c/549/09. <p>The proposed Oil Rig was not a Council development.</p>
11.6.3 Sustainability			
i) Submission suggests that works on sustainability be used and referenced in the drafting of the plan particularly in relation to urban design.	A053		The Planning Authority welcomes the details of reference materials provided and will endeavour to examine the literature when drafting the Plan.

Part 3: Summary of Main Issues & Chief Executive's Opinion & Recommendations

Key Issue Section 11: Miscellaneous	Sub. No.	Map No.	Chief Executive's Opinion & Recommendation
ii) Submission questions how progress is measured in terms of the existing plan and achievement of objectives.	A053		<p>Section 15 of the Planning and Development Act 2000 (as amended) states that <i>"The Chief Executive of a Planning Authority shall, not more than 2 years after the making of a development plan, give a report to the members of the authority on the progress achieved in securing the objectives referred to..."</i></p> <p>This report aids the Local Authority in establishing whether the objectives are being met. In addition under the Strategic Environmental Assessment process - which looks at the impacts of the Plan on the environment - a report was also prepared which examined certain environmental indicators in the county. This assessment also aids the Local Authority in measuring progress in relation to implementing the objectives of the Plan.</p>
iii) Submission raises issue of integration with adjoining areas and plans.	A053		<p>The fact that political /administrative boundaries do not coincide with geographical, hydrological and other boundaries is always an issue, especially when dealing with a County such as Dún Laoghaire-Rathdown which functions as part of the wider Dublin Metropolitan Area. Liaison with adjoining Counties/City forms part of the Development Plan Review process. The Regional Authority and other bodies such as the National Transport Authority also have a role in ensuring coordination between adjoining areas.</p>

APPENDICES A-E

Appendix A
Persons/Bodies Directly Informed

Appendix A: Persons/Bodies Directly Informed

1. Prescribed Bodies

- An Bord Pleanála, 64 Marlborough Street, Dublin 1
- Chief Executive, Dublin Airport Authority, Head Office, Dublin Airport, Co Dublin
- Mr Shaun Quinn, Chief Executive, Fáilte Ireland, National Tourism Authority, Environment Unit, 88-95 Amiens Street, Dublin 1
- Chief Executive, Central Fisheries Board, Swords Business Campus, Balheary Road, Swords, Co Dublin
- Arts Council, Planning Section, An Comhairle Ealaíon, 70 Merrion Square, Dublin 2
- Office of Public Works, Office of Minister of State at Department of Finance, St Stephens Green, Dublin 2
- Mr Gerry Murphy, Chief Executive Officer, National Transport Authority, Dún Sceine, Harcourt Lane, Dublin 2
- Mr. John Redmond, Company Secretary, c/o Ms. Bridie Lynch, ESB Business Service Centre, 27 Lr. Fitzwilliam Street, Dublin 2.
- Chief Executive, Forfas, Wilton Park House, Wilton Place, Dublin 2
- The Heritage Council, Rothe House, Kilkenny, Co Kilkenny
- National Authority for Occupational Safety & Health, HAS, Metropolitan Buildings, James Joyce Street, (off Talbot St), Dublin 1
- Chief Executive, National Roads Authority, St Martin's House, Waterloo Road, Dublin 4
- Eastern Regional Fisheries Board, 15a Main Street, Blackrock, Co. Dublin
- An Taisce, The Tailors Hall, Back Lane, Dublin 8
- Dublin City Council, Planning Department, Civic Offices, Fishamble Street, Dublin
- South Dublin County Council, Planning Department, County Hall, Tallaght, Dublin 24
- Wicklow County Council, Planning Department, County Buildings, Wicklow, Co Wicklow
- Bray Town Council, Planning Department, Municipal Offices, St Cronan's, Main Street, Bray, Co. Wicklow
- Dublin Regional Authority, Unit K28 Drinan Enterprise Centre, Swords Enterprise Park, Feltrim Road, Swords, Co Dublin
- Mr Tadhg O'Mahony, Senior Scientific Officer, Environmental Protection Agency, SEA Section, Office of Licensing & Guidance, Regional Inspectorate, Inniscarra, Co Cork
- The Manager, Development Applications Unit (DAU) Department of Arts, Heritage & The Gaeltacht, Newtown Road, Wexford
- Chief Executive, Railway Procurement Agency, Parkgate Business Centre, Parkgate Street, Dublin 8
- Irish Water HQ., Coleville House, 24-26 Talbot Street, Dublin 1.
- Company Secretary, EirGrid, The Oval, 160 Shelbourne Road, Ballsbridge, Dublin 4
- Dublin Bus, 59 Upper O'Connell Street, Dublin 1.
- An Garda Síochána, Phoenix Park, Dublin 8.
- Chief Executive Officer, Health Service Executive, Dr. Stephen's Hospital, Dublin 8.
- Spatial Policy Section, Dept of the Environment, Community & Local Government, Custom House, Dublin 1.
- Co-Ordination Unit, Dept of Communications Energy & Natural Resources, 1st Floor, Elm House, Cavan

2. Government Departments

- Minister for the Environment, Community and Local Government, Department of Environment, Community and Local Government, Custom House, Dublin 1.
- Minister for Communications, Energy and Natural Resources, Department of Communications, Energy & Natural Resources, 29-31 Adelaide Road, Dublin 2.
- Minister for Education and Skills, Department of Education & Skills, Marlborough Street, Dublin 1.
- Minister for Enterprise, Jobs and Innovation, Department of Enterprise, Jobs & Innovation, 23 Kildare Street, Dublin 2.
- Minister for Transport, Tourism & Sport, Department of Transport, Tourism & Sport, Transport House, 44 Kildare Street, Dublin 2.
- Minister for Arts, Heritage & The Gaeltacht, 23 Kildare Street, Dublin 2.
- Minister for Agriculture, Food and the Marine, Department of Agriculture, Food and the Marine, Agriculture House, Kildare Street, Dublin 2.

Appendix A: Persons/Bodies Directly Informed

- Tánaiste & Minister for Foreign Affairs and Trade, Dail Eireann, Kildare Street, Dublin 2.
- Minister for Justice Equality & Defence, Department of Justice, Equality & Defence, 94 St. Stephen's Green, Dublin 2.

3. Elected Members (28)

4. Local TDs

5. Libraries

6. Other Bodies

- Strategic Planning Committee Members
- circa 600 members from Community & Voluntary Forum, Various Interest Groups including Tourism, Construction and Social & Economic Organisations and Residents Associations
- circa 100 'Top Businesses in the County'
- circa 35 Post-Primary Schools
- circa 20 Business Associations and Chambers of Commerce

Appendix B
Submissions Received
Numerical Order
Alphabetical Order

Appendix B: Submissions Received Numerical Order

Appendix B Submissions Received Numerical Order

Ref No	Name	Organisation
A001	Alice Jackman	
A002	Denis Coughlan	
A003	Thomas Clune	Corke Abbey Residents Association
A004	Margaret Madigan	
A005	Liam Smyth	Irish Concrete Federation
A006	Vincent Delany	The Water Wag Club
A007	Malachy Bradley	Dublin & Mid East Regional Authority
A008	Niamh Breathnach	
A009	John Spain	John Spain Associates on behalf of Tristor Ltd.,
A010	Chris Quattrociocchi	Office Of The Minister for Justice and Equality
A011	Kieran Dooley	
A012	Barbara Dwyer	
A013	Joanna Marsden	
A014	Deirdre Kingston	
A015	Veronica Heywood	An Taisce Booterstown Nature Reserve Management Advisory Committee
A016	Martin McCarthy	
A017	Tomás Bradley	An Taisce

Appendix B: Submissions Received Numerical Order

Ref No	Name	Organisation
A018	Michael Nolan	Marsham Court Residents Association
A019	Paul King	
A020	Nicholas Headley	
A021	Barbara Pierce	
A022	Patrick Pierce	
A023	Reg McCabe	Dalkey Civic Trust
A024	Trevor & Diane Orr	
A025	Michael Herbert	
A026	Sarah O'Connor	Rathmichael Residents Association Ltd
A027	Patricia Greaney	Dún Laogharie-Rathdown County Childcare Committee
A028	Conor Clinch	
A029	Roslyn Nicholson	Bayview Residents Association
A030	Jacinta Skelly Shepherd	
A031	Yvonne Dalton	Dublin Airport Authority
A032	John Sweeney	Marley Grange Residents Association
A033	Mark & Carmel McAllister	
A034	Ciaran O'Brien	O'Brien Finucane Architects on behalf of Dundrum South Dublin Athletic Club Ltd
A035	John Buttler	Geological Survey of Ireland

Appendix B: Submissions Received Numerical Order

Ref No	Name	Organisation
A036	Don Fleming	
A037	Andrew J. Deeks	University College Dublin
A038	Barry & Camilla Cahill	Probus Club Dún Laoghaire Marine
A039	Pat Coffey	On behalf of Dún Laoghaire-Rathdown County Council Disability Consultation Group
A040	Jill Fleming	
A041	Paul Clinch	
A042	Gerard Crowley	ESB Business Service Centre
A043	Ray Ryan	BMA Planning on behalf of Cherrywood Properties
A044	Clifford Hilliard	The Abbeyfield (Dublin) Society
A045	John & Marie Cross	
A046	Frank Hearne	Foxrock Area Community & Enterprise Ltd (F.A.C.E.)
A047	Fergal MacCabe	
A048	Michael Shiell	
A049	Olivia Dunne	Royal Terrace Residents Association
A050	Sheila Simmons	Irish Association Of Older People
A051	Teresa Whitaker	Corbawn Residents Association
A052	John O'Keefe	O'Keefe Architects
A053	Jane Reid	

Appendix B: Submissions Received Numerical Order

Ref No	Name	Organisation
A054	Andrew Bonar Law	
A055	Muireen Duffy	GVA on behalf of Tesco Ireland Ltd
A056	Marie Durkin	
A057	Laura Brock	Brock McClure Planning & Development Consultants on behalf of Jim & Gretta Leyden
A058	The Secretary	Corbawn Residents Association
A059	Mary Anderson	Seafield Residents
A060	Laura Brock	Brock McClure Planning & Development Consultants on behalf of Patrick & Evelyn Brock
A061	Sinead O'Malley	Eirgrid
A062	David Gilligan	Gilligan Architects on behalf of Green Property Ltd
A063	Patricia O'Leary	Department of Arts, Heritage & The Gaeltacht
A064	Michael Fitzpatrick	
A065	Warren Whitney	
A066	Ray Ryan	BMA Planning on behalf of Crossridge Investments Limited/Lenridge Properties
A067	Reg McCabe	Dalkey Civic Trust
A068	James Leonard	Castlethorn Construction
A069	Desmond Morgan	Cornelscourt Residents & Business Association

Appendix B: Submissions Received Numerical Order

Ref No	Name	Organisation
A070	Darran Quaile	Simon Clear & Associates on behalf of William Neville & Sons Construction
A071	Caleb Murray	
A072	Martin D. Bermon	
A073	Matthew I. Coleman	Irish Seniors Citizens Parliament
A074	Tony Manahan	Manahan Planners on behalf of Sandyford Business District Association
A075	Brid Meehan	
A076	Clare Connolly	Department of Education & Skills
A077	Auveen Byrne	Auveen Byrne & Associates on behalf of Dún Laoghaire Combined (Sailing) Clubs
A078	Darran Quaile	Simon Clear & Associates on behalf of Ballymore Properties
A079	Rob Genest	
A080	Robert Keran	John Spain Associates on behalf of Ziggurat Montrose Ireland Ltd
A081	Robert Keran	John Spain Associates on behalf of National Yacht Club
A082	Robert Keran	John Spain Associates on behalf of Cavaili Real Estate Fund I
A083	Paul O'Neill	GVA on behalf of Drury Investments Ltd
A084	Robert Keran	John Spain Associates on behalf of Green Property Limited
A085	Cliona O'Sullivan	

Appendix B: Submissions Received Numerical Order

Ref No	Name	Organisation
A086	John Spain	John Spain Associates on behalf of Percy Nominees Ltd
A087	John Spain	John Spain Associates on behalf of Tristor Limited
A088		Development Land Services
A089	John Spain	John Spain Associates on behalf of Park Developments Ltd
A090	Paul Tansey	Orwell Sheelers Cycling Club
A091	Philip Kavanagh	Stephen Little Associates on behalf of Knockraboo Developments Ltd
A092	Marita Conlon McKenna	
A093	Daniel Shanahan	Stillorgan Rugby Football Club
A094	Maria Lombard	RPS on behalf of Cosgrave Developments
A095	Sven Spollen-Behrens	Dún Laoghaire Business Improvement District
A096	Joan Whyte	Ballinclea Heights Residents Association
A097	P.J. Drudy	Rocheshill Protection Association
A098	Ken J. Byrne	
A099	Philip Kavanagh	Stephen Little & Associates on behalf of Dún Laoghaire Harbour Company
A100	Joey Mason	
A101	Richard Dolan	
A102	Thomas Maguire	Crosscare

Appendix B: Submissions Received Numerical Order

Ref No	Name	Organisation
A103	Elizabeth Clooney	
A104	Richard Boyd Barrett	People Before Profit
A105	Patrick Daly	Columbanus Community Campaign
A106	John & Sarah O'Connor	
A107	Paul O'Neill	GVA on behalf of KFC UK & Ireland
A108	Hugh Creegan	National Transport Authority
A109	John Casey	Irish Water
A110	Eamonn Prenter	Cunnane Stratton Reynolds
A111	Miriam Hegarty	Dún Laoghaire Community Enterprise Society
A112	Paul Sweeney	
A113	Sara O'Rourke	Save our Seafront
A114	Kevin Hughes	Hughes Planning & Development Consultants on behalf of Pegasus Life
A115	Laura Brock	Brock McClure Planning & Development Consultants on behalf of Musgrave Retail Partners Ireland
A116	Eamonn Prenter	Cunnane Stratton Reynolds on behalf of New Generation Homes
A117	Roger Garland	Keep Ireland Open
A118	Hugh Larkin	
A119	Pat O'Donoghue	Railway Procurement Agency

Appendix B: Submissions Received Alphabetical Order

Appendix B Submissions Received Alphabetical Order

Ref No.	Name	Organisation
A088		Development Land Services
A059	Anderson Mary	Seafield Residents
A072	Bermon Martin D.	
A054	Bonar Law Andrew	
A104	Boyd Barrett Richard	People Before Profit
A007	Bradley Malachy	Dublin & Mid East Regional Authority
A017	Bradley Tomás	An Taisce
A008	Breathnach Niamh	
A057	Brock Laura	Brock McClure Planning & Development Consultants on behalf of Jim & Gretta Leyden
A060	Brock Laura	Brock McClure Planning & Development Consultants on behalf of Patrick & Evelyn Brock
A115	Brock Laura	Brock McClure Planning & Development Consultants on behalf of Musgrave Retail Partners Ireland
A035	Buttler John	Geological Survey of Ireland
A077	Byrne Auveen	Auveen Byrne & Associates on behalf of Dún Laoghaire Combined (Sailing) Clubs
A098	Byrne Ken J.	
A038	Cahill Barry & Camilla	Probus Club Dún Laoghaire Marine

Appendix B: Submissions Received Alphabetical Order

Ref No.	Name	Organisation
A109	Casey John	Irish Water
A028	Clinch Conor	
A041	Clinch Paul	
A103	Clooney Elizabeth	
A003	Clune Thomas	Corke Abbey Residents Association
A039	Coffey Pat	On behalf of Dún Laoghaire-Rathdown County Council Disability Consultation Group
A073	Coleman Matthew I.	Irish Seniors Citizens Parliament
A092	Conlon McKenna Marita	
A076	Connolly Clare	Department of Education & Skills
A002	Coughlan Denis	
A108	Creegan Hugh	National Transport Authority
A045	Cross John & Marie	
A042	Crowley Gerard	ESB Business Service Centre
A031	Dalton Yvonne	Dublin Airport Authority
A105	Daly Patrick	Columbanus Community Campaign
A037	Deeks Andrew J.	University College Dublin
A006	Delany Vincent	The Water Wag Club
A101	Dolan Richard	

Appendix B: Submissions Received Alphabetical Order

Ref No.	Name	Organisation
A011	Dooley Kieran	
A097	Drudy P.J.	Rocheshill Protection Association
A055	Duffy Muireen	GVA on behalf of Tesco Ireland Ltd
A049	Dunne Olivia	Royal Terrace Residents Association
A056	Durkin Marie	
A012	Dwyer Barbara	
A064	Fitzpatrick Michael	
A036	Fleming Don	
A040	Fleming Jill	
A117	Garland Roger	Keep Ireland Open
A079	Genest Rob	
A062	Gilligan David	Gilligan Architectson behalf of Green Property Ltd
A027	Greaney Patricia	Dún Laogharie Rathdown County Childcare Committee
A020	Headley Nicholas	
A046	Hearne Frank	Foxrock Area Community & Enterprise Ltd (F.A.C.E.)
A111	Hegarty Miriam	Dún Laoghaire Community Enterprise Society
A025	Herbert Michael	
A015	Heywood Veronica	An Taisce Booterstown Nature Reserve Management Advisory Committee

Appendix B: Submissions Received Alphabetical Order

Ref No.	Name	Organisation
A044	Hilliard Clifford	The Abbeyfield (Dublin) Society
A114	Hughes Kevin	Hughes Planning & Development Consultants on behalf of Pegasus Life
A001	Jackman Alice	
A091	Kavanagh Philip	Stephen Little Associates on behalf of Knockraboo Developments Ltd
A099	Kavanagh Philip	Stephen Little & Associates on behalf of Dún Laoghaire Harbour Company
A080	Keran Robert	John Spain Associates on behalf of Ziggurat Montrose Ireland Ltd
A081	Keran Robert	John Spain Associates on behalf of National Yacht Club
A082	Keran Robert	John Spain Associates behalf of Cavaili Real Estate Fund I
A084	Keran Robert	John Spain Associates on behalf of Green Property Limited
A019	King Paul	
A014	Kingston Deirdre	
A118	Larkin Hugh	
A068	Lenoard James	Castlethorn Construction
A094	Lombard Maria	RPS on behalf of Cosgrave Developments
A047	MacCabe Fergal	
A004	Madigan Margaret	
A102	Maguire Thomas	Crosscare

Appendix B: Submissions Received Alphabetical Order

Ref No.	Name	Organisation
A074	Manahan Tony	Manahan Planners on behalf of Sandyford Business District Association
A013	Marsden Joanna	
A100	Mason Joey	
A033	McAllister Mark & Carmel	
A023	McCabe Reg	Dalkey Civic Trust
A067	McCabe Reg	Dalkey Civic Trust
A016	McCarthy Martin	
A075	Meehan Brid	
A069	Morgan Desmond	Cornelscourt Residents & Business Association
A071	Murray Caleb	
A029	Nicholson Roslyn	Bayview Residents Association
A018	Nolan Michael	Marsham Court Residents Association
A034	O'Brien Ciaran	O'Brien Finucane Architects on behalf of Dundrum South Dublin Athletic Club Ltd
A106	O'Connor John & Sarah	
A026	O'Connor Sarah	Rathmichael Residents Association Ltd
A119	O'Donoghue Pat	Railway Procurement Agency
A052	O'Keefe John	O'Keefe Architects
A063	O'Leary Patricia	Department of Arts, Heritage & The Gaeltacht

Appendix B: Submissions Received Alphabetical Order

Ref No.	Name	Organisation
A061	O'Malley Sinead	Eirgrid
A083	O'Neill Paul	GVA on behalf of Drury Investments Ltd
A107	O'Neill Paul	GVA on behalf of KFC UK & Ireland
A113	O'Rourke Sara	Save our Seafront
A024	Orr Trevor & Diane	
A085	O'Sullivan Cliona	
A021	Pierce Barbara	
A022	Pierce Patrick	
A110	Prenter Eamonn	Cunnane Stratton Reynolds
A116	Prenter Eamonn	Cunnane Stratton Reynolds on behalf of New Generation Homes
A070	Quaile Darran	Simon Clear & Associates on behalf of William Neville & Sons Construction
A078	Quaile Darran	Simon Clear & Associates on behalf of Ballymore Properties
A010	Quattrociocchi Chris	Office Of The Minister for Justice and Equality
A053	Reid Jane	
A043	Ryan Ray	BMA Planning on behalf of Cherrywood Properties
A066	Ryan Ray	BMA Planning on behalf of Crossridge Investments Limited/Lenridge Properties
A093	Shanahan Daniel	Stillorgan Rugby Football Club

Appendix B: Submissions Received Alphabetical Order

Ref No.	Name	Organisation
A048	Shiell Michael	
A050	Simmons Sheila	Irish Association Of Older People
A030	Skelly Shepherd Jacinta	
A005	Smyth Liam	Irish Concrete Federation
A009	Spain John	John Spain Associates on behalf of Tristor Ltd
A086	Spain John	John Spain Associates on behalf of Percy Nominees Ltd
A087	Spain John	John Spain Associates on behalf of Tristor Limited
A089	Spain John	John Spain Associates on behalf of Park Developments Ltd
A095	Spollen-Behrens Sven	Dún Laoghaire Business Improvement District
A032	Sweeney John	Marley Grange Residents Association
A112	Sweeney Paul	
A090	Tansey Paul	Orwell Sheelers Cycling Club
A058	The Secretary	Corbawn Residents Association
A051	Whitaker Teresa	Corbawn Residents Association
A065	Whitney Warren	
A096	Whyte Joan	Ballinclea Heights Residents Association

Appendix C

**Principal National, Regional And Local Policy Documents, Guidelines And Plans That Will Help Inform
And Guide The Preparation Of The New Development Plan**

Appendix C Principal national, regional and local policy documents, guidelines and plans that will help inform and guide the preparation of the new Development Plan.

National

- Local Government Reform Act, 2014
- Review of Part V of the Planning and Development Act, 2000 – Consultation Document. DKM, BSM, November 2012.
- National Housing policy for People with a Disability, 2011 – 2016, DECLG.
- Housing Policy Statement, June 2011, DECLG.
- Construction 2020, a Strategy for a Renewed Construction Sector, Department of the Taoiseach, May 2014.
- Housing Supply Requirements in Irelands Urban Settlements 2014 – 2018, Overview, The Housing Agency, April 2014.
- Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities and Urban Design Manual: A Best Practice Guide, DECLG, May 2009.
- Sustainable Urban Housing: Design Standards for new Apartments. Guidelines for Planning Authorities, DOELG, September 2007
- Towards 2016 - Ten Year framework Social Partnership Agreement 2006-2015.
- The Planning and Development Act & Regulations, 2000 - 2013 (as amended).
- National Spatial Strategy 2002-2020, People Places Potential, DOELG 2002.
- Implementing the National Spatial Strategy: 2010 Update and Outlook, October 2010.
- Guidance notes on Core Strategies, DECLG, November 2010.
- Action on Housing, DOELG. June 2000.
- Water Services Act 2013.
- DMURS – Design Manual for Urban Roads and Streets 2013, Department of Transport, Tourism and Sport and DECLG.
- National Cycle Manual, National Transport Authority, 2011.
- National Heritage Plan, Department of Arts, Heritage Gaeltacht and the Islands, April 2002.
- National Monuments Acts, 1930-1994.
- Actions for Biodiversity, 2011 – 2016, Department of Arts, Heritage, Gaeltacht and the Islands, 2002.
- Sustainable Urban Housing: Design Standards for New Apartments, September 2007.
- "Ready Steady Play!" A National Play Strategy, 2004.
- The National Action Plan for Social Inclusion.
- Development Plans - Guidelines for Planning Authorities, DECLG, June 2007
- Residential Density Guidelines - Guidelines for Planning Authorities, DOELG, 1999
- Childcare Facilities- Guidelines for Planning Authorities, DOELG, 2001.
- Quarries and Ancillary Activities - Guidelines for Planning Authorities, DOELG, 2004.
- Architectural Heritage Protection-Guidelines for Planning Authorities, DOELG, 2005.
- Architectural Heritage (National Inventory) and Historic Monuments (Miscellaneous Provisions) Act, 1999.
- Heritage Act, 1995.
- Framework and Principles for the Protection of the Archaeological Heritage, Department of Arts, Heritage, Gaeltacht and the Islands 1999
- Sustainable Rural Housing – Guidelines for Planning Authorities, DOELG, 2005.
- Landscape and Landscape Assessment – Consultation Draft Guidelines for Planning Authorities, DOELG, 2000.
- Appropriate Assessment of Plans and Projects in Ireland. Guidelines for Planning Authorities, DECLG, February 2010.
- Code of Practice on the provision of Schools and the Planning System, DEHLG and DoES, January 2008.
- Implementation of SEA Directive (2001/42/EC): Assessment of the Effects of Certain Plans and Programmes on the Environment. Guidelines for regional Authorities and Planning Authorities, DOEHLG, November 2004.

- Planning and Development Strategic Environmental Assessment Regulations (SI. 436 of 2004) as amended by (SI.201 of 2011).
- Quality Housing for Sustainable Communities - Best Practice Guidelines.
- Transport 21, Strategy for the Greater Dublin Area, 2006-2016, Department of Transport.
- Waste Management - Changing our Ways, 1998.
- Wind Energy- Development Guidelines for Planning Authorities, July 1996.
- Telecommunications Antennae and Support Structures-Guidelines for Planning Authorities, DOELG, 1996. (Under Review).
- Delivering a Sustainable Energy Future for Ireland (2007). Government White Paper on The Energy Policy Framework.
- Bio- Energy Action Plan, Department of Communication, Energy and Natural Resources.
- Retail Planning, Guidelines for Planning Authorities, DECLG, April 2012.
- Retail Design Manual, A companion guide to the Retail Planning, Guidelines for Planning Authorities, DECLG, April 2012.
- Supporting Economic Recovery and Jobs – Locally, Local Government Sectoral Strategy to promote Employment and Support local Enterprise, DECLG, Action Plan for Jobs, 2012.
- Putting People First, Action Programme for Effective Local Government, DECLG, October 2012.
- General Scheme of Maritime Area and Foreshore (Amendment) Bill 2013.
- Implementing the National Spatial Strategy, 2010 update and outlook, DECLG, October 2010.
- Smarter Travel, A Sustainable Transport Future, A new Transport policy for Ireland, 2009 – 2020.
- Spatial Planning and National Roads, Guidelines for Planning Authorities, DECLG, January 2012.
- Local Area Plans, Guidelines for Planning Authorities, DECLG, June 2013.
- Manual for Local Area Plans, A companion document to the Guidelines for Planning Authorities on Local Area Plans, June 2013.
- National Climate Change Strategy 2007 – 2012, DECLG.
- National Climate Change Adaptation Framework, Building Resilience to Climate Change, DECLG, Dec 2012.
- National Biodiversity Plan, “Actions for Biodiversity, 2011 – 2016” prepared by the Department of the Arts, Heritage, Gaelteacht and the Islands
- A National Landscape Strategy for Ireland – Strategy Issue paper for Consultation” Sept 2011.
- Proposed Capital Investment Plan, 2014 – 2016, Irish Water.

Regional

- CSO Regional Population Projections, December 2013
- Retail Planning Strategy for the Greater Dublin Area 2008-2016.
- Regional Planning Guidelines for the Greater Dublin Area 2010 – 2022.
- Greater Dublin Strategic Drainage Study, 2002-2031.
- Greater Dublin Water Supply Strategic Study, 1996-2016.
- Dublin Mountains Strategic Plan for Development of Outdoor Recreation 2007-2017.
- Greater Dublin Area Draft Transport Strategy. 2011 – 2030 Vision, NTA, June 2011.
- Waste Management Plan for the Dublin Region 2005-2010.
- Air Quality Plan for the Dublin Region 1999.
- Eastern CFRAM Study, HA10 Inception report, OPW, July 2012.
- Integrated Implementation Plan 2013 – 2018, National Transport Authority.
- Eastern River Basin District River Basin Management Plan 2009 – 2015.
- Planning and Development of Large Scale, Rail Focused Residential Areas in Dublin, NTA, DECLG, May 2013.
- Dublin Environmental Noise Action Plan 2013 – 2018, December 2013.

Local

- Dún Laoghaire-Rathdown County Development Plan 2010 – 2016 (including variations).
- Traveler Accommodation Programme (2014 – 2018).
- Dún Laoghaire-Rathdown Biodiversity Plan 2009 – 2013.
- 'In Honour and Memory' - Memorials of Dún Laoghaire-Rathdown.
- An Urban Design Framework for Foxrock Village: Preliminary Report.
- Stepside Action Area Plan, 2000.
- Green City Guidelines, Advice of the protection and enhancement of biodiversity in medium to high-density urban development. UCD, Dún Laoghaire-Rathdown County and Council and Fingal County Council. 2008.
- Deansgrange Local Area Plan 2010 – 2020. Dún Laoghaire-Rathdown County Council. June 2010.
- Kiltiernan/Glenamuck Local Area Plan, 2013 – 2019, Dún Laoghaire-Rathdown County Council, September 2013.
- Goatstown Local Area Plan, Dún Laoghaire-Rathdown County Council, April 2012.
- Woodbrook/Shanganagh Local Area Plan 2006 – 2016, Dún Laoghaire-Rathdown County Council, Nov 2006.
- Glencullen Local Area Plan 2008, Dún Laoghaire-Rathdown County Council, March 2008.
- Cherrywood SDZ Planning Scheme, April 2014.
- Stillorgan Local Area Plan, Dún Laoghaire-Rathdown County Council, October 2007.
- Dún Laoghaire-Rathdown County Council Coastal Defence Strategy Study, Final Report, Malachy Walsh and Partners, 2010.
- Dún Laoghaire Harbour Masterplan, Dún Laoghaire Harbour Authority.
- DLR Heritage Plan 2013 – 2019, Contributing towards Quality of Life.
- County Sports Participation Strategy 2013-2017 to the 'Local section' at the end of Appendix C.

Note: This list is not exhaustive and additional documents will help inform and guides the preparation of the Draft County Development Plan.

Appendix D
Mandatory Requirements for Development Plan

Appendix D Mandatory Requirements for Development Plan

A number of mandatory requirements must be included in any Development Plan. In summary a Plan must:

- Set out an overall strategy for the proper planning and sustainable development of the areas of the Development Plan and shall consist of a written statement and a plan or plans indicating the development objectives for the area in question.
- Include a core strategy.
- Have regard to economic, social and cultural considerations in the development of policies and proposals.
- Be consistent as far as possible with National Plans, Strategies and Policies.
- Have regard to the Development Plans of adjoining planning authorities.
- Include a separate statement, which shows that the development objectives in the development plan are consistent, as far as practicable, with the conservation and protection of the environment.
- Include objectives for the zoning of land for particular purposes (whether residential, commercial, industrial, agricultural, recreational, as open space or otherwise, or a mixture of these uses) where and to such an extent as the proper planning and sustainable development of the area requires these uses to be indicated.
- Include objectives for the provision, or facilitation of the provision, of infrastructure including:
 - (i) Transport, energy and communication facilities,
 - (ii) Water supplies and waste water services (regard having being had to the water services strategic plan for the area made in accordance with the Water Services Act 2007) (A new water services strategic plan will be prepared by Irish Water in accordance with the Water Services Act 2013),
 - (iii) Waste recovery and disposal facilities (regard being had to the waste management plan for the area made in accordance with the Waste Management Act 1996), and
 - (iv) Any ancillary facilities or services.
- Include objectives for the conservation and protection of the environment including the archaeological and natural heritage and the conservation and protection of European Sites and any other sites which may be prescribed for the purposes of this paragraph.
- Include objectives for the encouragement, pursuant to Article 10 of the Habitats Directive, of the management of features of the landscape, such as traditional field boundaries, important for the ecological coherence of the Natura 2000 network and essential for the migration, dispersal and genetic exchange of wild species.
- Include objectives for the promotion of compliance with environmental standards and objectives established:
 - (i) For bodies of surface water, by the European Communities (Surface Water Regulations 2009),
 - (ii) For Groundwater, by the European Communities (Groundwater) Regulations 2010.
- Include objectives for the integration of planning and sustainable development with the social, community and cultural requirements of the area and its population
- Include objectives for the preservation of the character of the landscape where, and to the extent that, in the opinion of the planning authority, the proper planning and sustainable development of the area requires it, including the preservation of views and prospects and the amenities of places and features of natural beauty or interest including views and prospects.
- Include objectives for the preservation of the character of Architectural Conservation Areas.
- Include objectives for the protection of structures or parts of structures, which are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest.
- Include objectives for the renewal of areas in need of regeneration.
- Include objectives for the provision of accommodation for travellers, and the use of particular areas for that purpose.
- Include objectives for the preservation, improvement and extension of amenities and recreational amenities.

Appendix D: Mandatory Requirements for Development Plan

- Include objectives for the control having regard to the provision of the Major Accidents Directive and any Regulations, under any enactment, giving effect to that Directive of:
 - (i) Siting of new establishments,
 - (ii) Modification of existing establishments, and
 - (iii) Development in the vicinity of such establishments,For the purposes of reducing the risk or limiting the consequences of a major accident.
- Include objectives for the provision of, or facilitation of the provision, of services for the community, including schools, crèches and other education and childcare facilities.
- Include objectives on the promotion of sustainable settlement and transportation strategies in urban and rural areas including the promotion of measures to:
 - (i) Reduce energy demand in response to the likelihood of increases in energy and other costs due to long term decline in non renewable resources,
 - (ii) Reduce anthropogenic greenhouse emissions, and
 - (iii) Address the necessity of adaptation to climate change in particular having regard to location, layout and design of new development.
- Include objectives on the preservation of public rights of way which give access to seashore, mountain, lakeshore, riverbank or other place of natural beauty or recreational utility, which right of way shall be identified both by marking them on at least one of the maps forming part of the development plan and by indicating their location on a list appended to the development plan.
- Include objectives on landscape, in accordance with relevant policies or objectives for the time being of the Government or any Minister of the Government relating to providing a framework for identification, assessment, protection, management and planning of landscape and developed having regard to the European Landscape Convention held in Florence in October 2000.
- Include a strategy (the Housing Strategy) for ensuring that the proper planning and sustainable development of the County provides for the housing of the existing and future population of the County.
- Includes policies and proposals for retail development in accordance with the DOECLG Retail Planning Guidelines.
- Incorporate an Environment Report resulting from a Strategic Environment Assessment of the Plan.
- There are also additional optional objectives, which may be included in the Plan. These are set out in the First Schedule of the Act and include objectives relating to the location and pattern of development, control of areas and structures, community facilities, environment and amenities, infrastructure and transport.
- The new Maritime and Foreshore (Amendment) Bill 2013 which has yet to be enacted will amend the Planning and Development Act 2000 to specify that mandatory objectives shall be included in development plans for 'development in the near shore area'.

Appendix E
Development Plan Timetable

