

21st March 2025

Senior Executive Officer,
Planning and Economic Development Department,
Dún Laoghaire-Rathdown County Council,
County Hall,
Marine Road,
Dún Laoghaire,
Co. Dublin.

Re: Draft Kiltiernan – Glenamuck Local Area Plan 2025

A chara,

Thank you for your authority's work on preparing the draft Kiltiernan - Glenamuck Local Area Plan 2025 (the draft Local Area Plan).

As your authority is aware, a key function of the Office is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning.

The Office has evaluated and assessed the draft Local Area Plan under the provisions of sections 31AO(1) and 31AO(2) of the Planning and Development Act 2000, as amended (the Act) and this submission has been prepared accordingly.

The Office's evaluation and assessment has regard to the Dún Laoghaire-Rathdown County Development Plan 2022-2028 (the County Development Plan), the Eastern and Midlands Regional Assembly (EMRA) Regional Spatial and Economic Strategy (RSES) and relevant section 28 guidelines.

Observations take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are required to ensure alignment with policy and legislative provisions. The planning authority is advised by the Office to action an observation.

A submission can include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. The planning

authority is requested by the Office to give full consideration to the advice contained in a submission.

Overview

The Office commends the significant work undertaken by the Dún Laoghaire-Rathdown County Council (Planning Authority) to inform the draft Local Area Plan. This includes an Area Based Transport Assessment (ABTA), Urban Design Report, Community Audit and Sustainable Neighbourhood Infrastructure Review and a Demographic and Housing Analysis, as well as the relevant statutory reports including Appropriate Assessment Screening (AA Screening), SEA Report and Strategic Flood Risk Assessment (SFRA). The Office is satisfied that the key recommendations and findings from these reports have been appropriately reflected in the draft Local Area Plan.

The draft Local Area Plan sets out a clear and detailed development planning framework for the development of the area over the lifetime of the plan. In particular, the Office welcomes the preparation of the Urban Design Framework and the detailed 10 individual Site Development Frameworks (SDF), which will guide future development proposals for the identified land parcels that are as yet undeveloped.

The Office also welcomes the emphasis on the 10-minute neighbourhood concept and the measures proposed in the draft Local Area Plan, such as, improvements to sustainable transport, permeability, regeneration, housing provision and the enhancement of social and community infrastructure to implement this concept. In this regard, the Office strongly commends the significant efforts made in the preparation of the ABTA that has informed the draft Local Area Plan.

The Office has identified only one matter that requires further consideration prior to the adoption of the LAP, in relation to Implementation and Monitoring.

It is within this context the submission below sets out one (1) observation under the following theme:

Key theme	Recommendation	Observation
Implementation and monitoring	-	Observation 1

1. Consistency with the Regional, Spatial and Economic Strategy (RSES)

The Office considers the draft Local Area Plan to be generally consistent with the regional policy objectives of the EMRA RSES. In this regard, the draft Local Area Plan promotes compact sustainable growth and significant housing delivery across Kiltiernan- Glenamuck, which forms part of Dublin City and suburbs and is identified as a strategic corridor (Metrolink/Luas Greenline) in the Metropolitan Area Strategic Plan (MASP).

The draft Local Area Plan is also generally consistent with Regional Policy Objectives in the RSES for compact growth (RPO 3.2 and RPO 3.3), MASP sustainable transport (RPO 5.2 and RPO 5.3) and MASP housing and regeneration (RPO 5.4 and RPO 5.5).

2. Consistency with development plan and core strategy

Section 19(2) of the Act requires a local area plan to be consistent with the objectives of the development plan and its core strategy. This requirement also applies under section 20(5) of the Act.

The County Development Plan's settlement strategy (figure 2.9 core strategy map) identifies Kiltiernan - Glenamuck as a new residential community largely within the boundary of Dublin City and suburbs. The County Development Plan's core strategy states that there is capacity to accommodate a potential yield of between 22,763 and 25,353 residential units across the county on 553 ha of lands identified for residential development and mixed use. Kiltiernan – Glenamuck will contribute to this figure with the potential to accommodate 2,015 additional residential units over the County Development Plan period 2022-2028.

The housing target of 2,524 units set out in the draft Local Area Plan has had regard to the quantum of development that has taken place in recent years, the application of the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) and the plan period of the draft Local Area Plan (2025-2031).

The draft Local Area Plan acknowledges that lands at Kiltiernan - Glenamuck are an important part of the Planning Authority's residential land supply and sets out appropriate policies to support same. The Office is therefore satisfied that the draft Local Area Plan is generally consistent with the County Development Plan, including its core strategy.

3. Compact growth, zoning and infrastructural services

All of the lands within the draft Local Area Plan boundary were zoned as part of the preparation of the County Development Plan. As such, the Office is satisfied that the land use zonings and Site Development Frameworks are consistent with RPO 3.2 (compact growth), RPO 4.1 (settlement strategy), RPO 5.2 and RPO 5.3 (MASP sustainable transport) and RPO 5.6 (MASP employment lands) of the RSES.

In accordance with RPO 5.1 (enabling infrastructure) of the RSES and section 4.5.2 of the Development Plans, Guidelines for Planning Authorities (2022) the Office is satisfied that there are sufficient infrastructural services in the area to cater for the projected growth of the Local Area Plan area.

4. Town centre regeneration

In relation to the Neighbourhood Centre zoning at the core of the plan area, identified as Kiltiernan Village Centre, the Office welcomes policy KGLAP41 of the Local Area Plan to provide an appropriate multifunctional mix of uses and to ensure a high quality, attractive civic environment and a sense of place and vitality which also optimises access to public transport corridors.

The Office wishes to acknowledge and commend the considerable work regarding the preparation of SDFs in the draft Local Area Plan, including the policies and objectives for each site which support RPO 5.5 of the RSES in relation to housing and regeneration in Dublin City and suburbs.

The Office also welcomes the policies and objectives in relation to enhancements to the public realm in each of these areas consistent with RPO 8.1 (integration of transport and land use planning) of the RSES.

5. Economic development and employment

The draft Local Area Plan identifies eight hectares of Economic and Employment zoning to the north of the plan area (Employment Lands – SDF1), which is consistent with Policy Objective CS7 – Strategic Employment Locations in the County Development Plan and with RPO 5.6 (MASP employment lands) of the RSES.

The Office welcomes policies and objectives for SDF1 which ensure the provision of a network of legible connected routes through the area, and that the transition between large

scale employment uses to the north and open space to the south is encouraged and active travel linkages with adjoining sites are maximised.

6. Transport and accessibility

The Planning Authority's commitment to improving opportunities for walking, cycling and public transport is clearly evident from the extensive work undertaken in the preparation of the ABTA, which accompanies the draft Local Area Plan. This assessment provides a clear evidence base for policies and objectives, including active travel proposals, in the draft Local Area Plan.

The Office welcomes this approach which is in accordance with the National Transport Authority (NTA) guidance.

The Office also welcomes Objective PT3 - Kiltiernan Bus Terminus of the Local Area Plan, to work with the NTA on the delivery of an interim bus terminus at Enniskerry Road and the identification and delivery of a dedicated bus terminus facility in the longer term.

The policies and objectives to improve connectivity, permeability, enhance pedestrian and cycle movements, promote the 10-minute neighbourhood concept, improve modal shift and reduce vehicle movements, all demonstrate consistency with the Transport Strategy for the Greater Dublin Area 2022-2042, the Greater Dublin Area Cycle Network Plan (2022), the National Sustainable Mobility Policy (2022) and RPO 8.4 (integration of transport and land use planning) of the RSES.

7. Flood Risk Management

A Strategic Flood Risk Assessment (SFRA) has been included as appendix 1 of the draft Local Area Plan. The SFRA is based on the information provided in the SFRA for the County Development Plan, which was prepared in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) and Circular PL 2/2014, RPO 7.12 (flooding) of the RSES and NPO 57 (water quality and resource management) of the National Planning Framework.

The Office acknowledges that policy KGLAP15 of the Local Area Plan addresses flood risk considerations for proposed development in and adjacent to Flood Zone A and B, and policy KGLAP10 ensures that Sustainable Urban Drainage Systems (SuDS) are applied to any development in the plan area.

8. Environment, natural and built heritage

The Office welcomes the integration of the climate action policies and objectives from the County Development Plan into the draft Local Area Plan.

Specifically, the Office supports the integration and implementation of the policies and provisions of the Dún Laoghaire-Rathdown County Council Climate Action Plan 2024-2029 in the preparation of the draft Local Area Plan.

The Office welcomes the policies and objectives in relation to Green Infrastructure, in particular the promotion of biodiversity, nature-based solutions to surface water management and the enhancement and extension of the parks and recreational facilities in the area.

The Office acknowledges the extension of the Local Area Plan boundary from that defined in the County Development Plan to include lands at Dixon's Lane and Dingle Glen proposed Natural Heritage Area.

The Office welcomes the policies and objectives in the draft Local Area Plan for the protection and conservation of the built and cultural heritage of the plan area, in accordance with RPO 9.27 (heritage) of the RSES, and the inclusion of policies KGLAP53 and KGLAP54 of the Local Area Plan to conserve archaeological heritage and protect recorded monuments from inappropriate development.

9. Education, social and community

The Office recognises that lands have been identified in the draft Local Area Plan for future education use, and the detailed requirement for post-primary or primary school provision within the plan area is yet to be determined and will be the subject of continued liaison with the Department of Education.

The Office welcomes the identification of Education zoned lands at a central location (SDF9) within the plan area, the inclusion of policies KGLAP19 and KGLAP20 to ensure future school provision and objectives SN1 and SN2 which provide for a new purpose-built community facility in the Neighbourhood Centre zoning (SDF6).

At a more general level, the inclusion of policies KGLAP17 and KGLAP18 support the provision of sustainable neighbourhood infrastructure consistent with the 10-minute neighbourhood concept.

10. Implementation and monitoring

The Office welcomes the inclusion of chapter 9 Implementation and Monitoring as part of the draft Local Area Plan which sets out the implementation and / or phasing of relevant policies and objectives.

Notwithstanding the level of detail provided, the Office considers that further detail in relation to identifying timelines and ownership / leadership for the implementation of key policies and objectives would strengthen the primary focus of the draft Local Area Plan to ensure that an adequate level of supporting services and amenities are provided in tandem with new developments.

A more detailed implementation and monitoring strategy would ensure a more efficient and effective plan implementation and would also assist in meeting the requirements of section 15 of the Act.

Observation 1 – Implementation and Monitoring

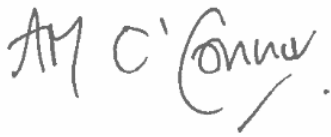
Having regard to section 6 of the Local Area Plans, Guidelines for Planning Authorities (2013), the Planning Authority is advised to review the proposed provisions of the draft Kiltiernan - Glenamuck Local Area Plan 2025 (draft Local Area Plan) concerning implementation and monitoring to provide more detail in relation to timelines and ownership / leadership to monitor the implementation of key policies and objectives of the Local Area Plan.

Summary

The Office advises that your authority addresses the observation outlined above and looks forward to continued positive engagement with your authority regarding the preparation of the Local Area Plan.

Please feel free to contact the staff of the Office in the context of your authority's consideration of the above, which we would be happy to facilitate. Contact can be initiated through plans@opr.ie.

Is mise le meas,

A handwritten signature in black ink that reads "AM O'Connor". The signature is written in a cursive style with a diagonal slash at the end.

Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluations

Designated Public Official under the Regulation of Lobbying Act 2015
