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Planning Department

Dún Laoghaire–Rathdown County Council

County Hall

Marine Road

Dún Laoghaire

Co. Dublin

**Re: Obsecration to "Flood relief scheme for the Carrickmines and Shanganagh rivers"
Specifically In relation to the demolition of existing wall and removal of vegetation on
Castle view road.**

Dear Sir/Madam,

I am writing to formally object to the proposed demolition of the existing granite wall and removal of trees at Castlevue, Carrickmines, Dublin 18, as outlined in the above-referenced planning application. My objections are based on concerns regarding the potential impact of this development on the historical significance, aesthetic value, and environmental integrity of the area including noise pollution.

1. Impact on the Preservation Order for the Land

The land in question is subject to a preservation order due to its historical significance, particularly with regard to Carrickmines Castle, which lies in proximity to the proposed site. The area is of considerable archaeological and cultural value, and as such, any construction or demolition in this area would diminish the sites importance.

Carrickmines Castle itself is an important medieval site, and the broader area has been identified as a zone of archaeological significance, as outlined in the **National Monuments Act (1930)** and subsequent amendments. The castle and its surrounding features, including stone walls and remnants of other historical structures, contribute to our understanding of medieval life in Dublin. In 2004, the Irish government passed the **National Monuments (Amendment)**

Act, which restricted construction in areas of archaeological significance such as Carrickmines. This act explicitly prevented the construction of the M50 through the immediate area surrounding the castle, ensuring that its historical and archaeological integrity was maintained. Given this legal context, any further encroachment on this protected land, such as the demolition of the granite wall, would directly undermine the preservation efforts mandated by this legislation and impact the historical aesthetics of the area.

The proposed site is located within the historic area of Carrickmines and within proximity (circa 20m) from Recorded (RMP No. DU026-005001) which refers to Carrickmines Castle. The report from the Development Applications Unit of the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media dated the 10th of May 2021 stated that the National Monuments Service recommend that conditions referring to pre-development archaeological assessment be included in a grant of planning permission. Demolition of the existing wall and construction within this area is in direct conflict with dlroco development plan 11.3.2.2 policy objective HER2: Carrickmines castle archaeological conservation plan.



11.3.2 Protection of Archaeological Heritage

11.3.2.1 Policy Objective HER3: Protection of Historic Towns

It is a Policy Objective to promote and protect the Historic Town of Dalkey as identified by the Department of Culture, Heritage and the Gaeltacht (DCHG) (consistent with RPO 9.27 of the RSES).

Dalkey, a Historic Town, has been designated by the DCHG as a zone of Archaeological Potential, and is an area where intense archaeology is present.

The redevelopment of the Historic Town of Dalkey will include as far as is practical the retention of the existing street layout, historic building lines and traditional plot widths where these derive from medieval or earlier origins.

The historic core of Dalkey is also an Architectural Conservation Area, with specific policy recommendations formulated to protect its special character and guide its future development.

11.3.2.2 Policy Objective HER4: Carrickmines Castle Site

It is a Policy Objective to support the implementation of the (Archaeological) Conservation Plan for the Carrickmines Castle Site.

The Carrickmines Castle (Archaeological) Conservation Plan will guide the management and conservation of the archaeological site through specific policies and actions for its care and conservation based on an understanding of the site.

11.3.2.3 Policy Objective HER5: Historic Burial Grounds

It is a Policy Objective to protect historical and/or closed burial grounds within the County and encourage their maintenance in accordance with good conservation practice and to promote access to such sites where possible.

There are numerous ecclesiastical sites throughout the County which are of significant archaeological interest, many of which are listed in the Record of Monuments and Places.

For the purposes of this policy, a historical burial ground is generally one which is no longer active and/or one that is included within the Record of Monuments and Places.

11.3.2.4 Policy Objective HER6: Underwater Archaeology

It is a Policy Objective for all developments, which have potential to impact on riverine, intertidal and sub-tidal environments to require an archaeological assessment prior to works being carried out.

Under the National Monuments Act, all shipwrecks

3. Aesthetic Impact on the Area

The granite wall is a key visual feature of Castlevew, contributing significantly to the traditional aesthetic of the area. The stone wall, with its natural texture and historic character, has become an essential part of the local charm and atmosphere. Its demolition would disrupt the visual cohesion of the streetscape, negatively affecting the overall aesthetic appeal of this historically rich location and prevent the residents viewing and accessing the river which is a key feature of the road. Replacing this structure with more modern or less sympathetic materials would detract from the visual identity of the neighborhood and diminish the cultural and historical feel of the area. The trees that surround the river and would be removed as a result of this application are not only critical from an aesthetic perspective as shown below, but are extremely important to residents to create cover from the surrounding M50 motorway while providing acoustic insulation from road traffic pollution. The residents maintain the trees, river and wall each year themselves and is a key part of the community on the road as below.



4. Environmental Impact on the River and Surrounding Ecology

The Castlevue area is classified as high from an environmental sensitivity perspective as shown in the DLR overlay below. The proposed demolition and any subsequent construction activity would likely cause significant disruption to the local environment, particularly with regard to the nearby river and surrounding natural habitats. As we are aware, the area is home to

various species of wildlife including otters, and the disruption of the local ecosystem could have detrimental effects on biodiversity. The trees in the area are home to various forms of wildlife including squirrels, birds and other animals and removing them will have a detrimental impact on the local environment. Demolition work and construction activities risk contaminating the nearby water sources, affecting water quality and the health of aquatic life. The noise, vibration, and potential for increased pollution during the construction phase could negatively impact both terrestrial and aquatic ecosystems.

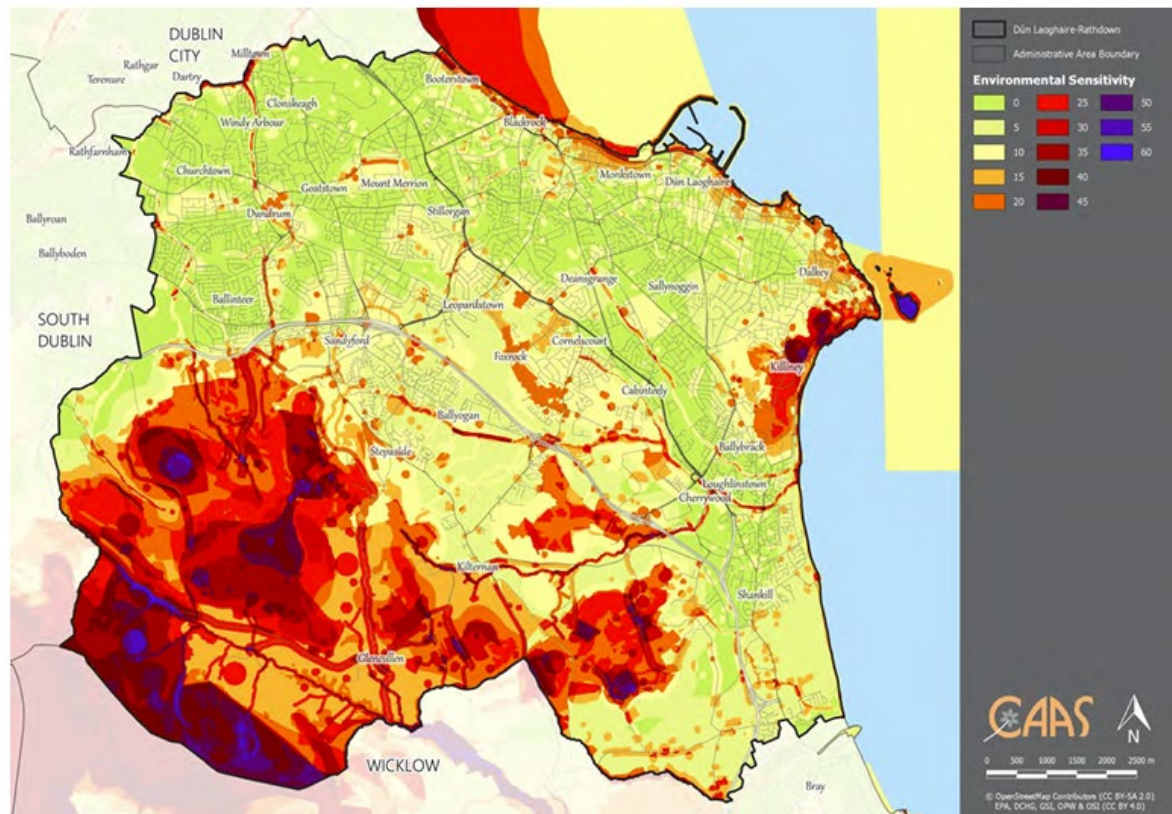


Figure 2.4 Overlay of Environmental Sensitivities

CAAS for Dún Laoghaire-Rathdown County Council

5. Heritage and Community Concerns

In addition to the environmental and aesthetic impacts, the demolition of the granite wall would also raise concerns within the local community. Many residents value the historical character of Carrickmines and the preservation of the area's traditional features. The removal of the wall could lead to a loss of community identity, as it forms part of the collective memory and historical narrative of the area.

Given that such features contribute to the overall well-being and quality of life for residents, it is essential that any proposals for the site take into account the preservation of the heritage and character of the area.

5. Visual Impact Assessment (VIA)

As part of my objection to the proposed demolition of the existing granite wall at Castlevue, Carrickmines, I would like to draw attention to the **visual impact** that this demolition would have on the area's character and aesthetic integrity.

- 1. Loss of Historical Aesthetic:** The granite wall is a key visual feature that contributes to the historical and cultural aesthetic of the Carrickmines area. Its rough-hewn stone and traditional design are consistent with the historical character of the region, particularly the nearby Carrickmines Castle. The wall serves as a visual cue of the historical significance of the area, maintaining the area's authentic and traditional look.
- 2. Impact on Visual Cohesion:** The demolition of the granite wall would create a noticeable gap in the streetscape. Without the wall, the transition between properties and the surrounding environment would be jarring and would detract from the visual harmony currently present. The open, more modern appearance that could replace the traditional stone wall would contrast sharply with the older structures in the area, diminishing the overall aesthetic appeal of the neighborhood.
- 3. Impact on Local Vantage Points:** From the **Carrickmines Green** and nearby viewpoints, the wall currently provides a sense of enclosure and aesthetic continuity. Its demolition would expose more of the development behind it, which is likely to be less visually compatible with the existing structures and the surrounding natural environment. This disruption in the visual experience would negatively affect the enjoyment of residents and visitors.
- 4. Effect on Historical Context:** The wall plays a role in contextualizing the area's history and character. Its demolition risks erasing part of the historical landscape and could lead to a fragmented and less cohesive representation of the area's heritage. This could be detrimental to the identity of Carrickmines and its surrounding communities, especially those who take pride in its historical context.
- 5. Overall Landscape Disruption:** Demolition of the wall would disturb the natural and built environment. The introduction of modern materials could conflict with the more naturalistic appearance of the surrounding landscape, including the stone and greenery that currently define the aesthetic of Carrickmines. The area would lose part of its charm and distinctive character, especially in a region that values both its heritage and natural beauty.

Conclusion

For the reasons outlined above, I strongly object to the proposed demolition of the existing granite wall and removal of the natural habitat in the form of trees at Castlevue, Carrickmines. The wall plays a crucial role in preserving the historical, aesthetic, and environmental integrity of the area and is cherished by the local community. The potential impacts of this proposal could be far-reaching, both in terms of local heritage and the surrounding natural environment.

I respectfully request that the planning application be reconsidered and that alternatives to demolition be explored to maintain the aesthetics of the area. A more thorough environmental

impact assessment and historical review of the site should be conducted before any decisions are made on consultation with the local residents and avoid impacting the local environment at all costs. There is no objection to regulating flow upstream/ downstream of castle view (Under the nearby bridges) where the impact is lower. Houses and surrounding areas are minimum circa 4M above the current river at high flow and flood concerns for this area do not exist and we request this area to be se-scoped from the project.

Thank you for considering my objections. I trust that the planning authority will take the necessary steps to ensure that this area, which holds significant cultural, environmental, and historical value, is protected for future generations.

Yours sincerely,

Jake Jackson



Strategic Environmental Assessment Statement

STRATEGIC ENVIRONMENTAL ASSESSMENT STATEMENT

FOR THE

DÚN LAOGHAIRE-RATHDOWN COUNTY DEVELOPMENT PLAN 2022-2028

for: Dún Laoghaire-Rathdown County Council

County Hall
Marine Road
Dún Laoghaire



by: CAAS Ltd.

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24-26 Ormond Quay Upper
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APRIL 2022

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Section 1 Introduction

1.1 Introduction and Legislative Context

This is the Strategic Environmental Assessment (SEA) Statement for the Dún Laoghaire-Rathdown County Development Plan (CDP) 2022-2028.

SEA is a systematic process of predicting and evaluating the likely environmental effects of implementing a plan, or other strategic action, in order to ensure that these effects are appropriately addressed at the earliest appropriate stage of decision-making on a par with economic and social considerations.

Directive 2001/42/EC of the European Parliament and of the Council of Ministers, of 27th June 2001, on the Assessment of the Effects of Certain Plans and Programmes on the Environment, referred to hereafter as the SEA Directive, introduced the requirement that SEA be carried out on plans and programmes which are prepared for a number of sectors, including land use. The SEA Directive was transposed into Irish Law through the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 and the Planning and Development (Strategic Environmental Assessment) Regulations 2004. The Regulations have been amended by the European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2011 and the Planning and Development (Strategic Environmental Assessment) (Amendment) Regulations 2011.

1.2 Content of the SEA Statement

Where SEA is undertaken, the Regulations require that a Statement is made available to

the public and the competent environmental authorities after the making of the Plan.

This Statement is referred to as an SEA Statement.

The SEA Statement is required to include information summarising:

- a) how environmental considerations have been integrated into the Plan;
- b) how the following have been taken into account during the preparation of the Plan:
 - the environmental report,
 - submissions and observations made to the planning authority on the Draft Plan and Environmental Report, and
 - any transboundary consultations (not required for this SEA).
- c) the reasons for choosing the Plan in the light of the other reasonable alternatives dealt with; and
- d) the measures decided upon to monitor the significant environmental effects of implementing the Plan.

1.3 Implications of SEA for the Plan

SEA has been undertaken on the Plan and the findings of the SEA are expressed in an Environmental Report, the first published version of which accompanied the Draft Plan on public display. The Environmental Report was updated in order to take account of changes to the original Draft Plan that were made on foot of submissions and recommendations in the submissions.

Dún Laoghaire-Rathdown County Council has been provided with the findings of SEA output during their consideration of the Plan and before the Plan was adopted.

Section 2 How Environmental Considerations were integrated into the Plan

2.1 Introduction

Environmental considerations were presented to the Council for its consideration through:

1. Consultations;
2. Communication of environmental sensitivities throughout the SEA process;
3. Appropriate Assessment;
4. Strategic Flood Risk Assessment;
5. Consideration of alternatives;
6. Integration of environmental considerations; and
7. Integration of individual SEA and AA provisions into the Plan.

2.2 Consultations

As environmental authorities identified under the Planning and Development (SEA) Regulations, as amended, the following authorities were sent SEA scoping notices indicating that submissions or observations in relation to the scope and level of detail of the information to be included in the environmental report could be made to Dún Laoghaire-Rathdown County Council¹: Department of Agriculture, Food and the Marine; Department of Culture, Heritage, and the Gaeltacht; Department of Housing, Planning and Local Government; Department of Communications, Climate Action and Environment; Environmental Protection Agency; Wicklow County Council; South Dublin County Council; and Dublin City Council.

Detail on submissions made on foot of the SEA scoping notice is provided under Section 3.2.

Detail is also provided on submissions that were made on the Draft Plan and/or the SEA Environmental Report while they were on public display (see Section 3).

¹ The names of some of the relevant authorities have changed since notification was provided.

2.3 Communication of environmental sensitivities throughout the SEA process

Environmental considerations were integrated into the Plan before it was placed on public display. Individual sensitivities that were considered by the Planning Team preparing the Plan included the following:

- European Sites (Special Areas of Conservation and Special Protection Areas);
- Other Ecological Designations;
- Status of Surface and Ground Waters;
- Various entries to the Water Framework Directive's Register of Protected Areas;
- Groundwater Vulnerability;
- Water Services Capacity, Performance and Demand;
- Cultural heritage (archaeological and architectural) sensitivities; and
- Landscape Designations.

A number of these sensitivities are mapped on Figures 2.1 to 2.3.

Overlay mapping of environmental sensitivities was also prepared and a number of the environmental sensitivities described above were weighted and mapped overlapping each other. Figure 2.4 provides the overlay mapping of Environmental Sensitivities that was prepared. Environmental sensitivities are indicated by colours which range from higher to lower sensitivity.

2.4 Appropriate Assessment

Appropriate Assessment (AA) Screening and Stage 2 AA have been undertaken alongside the Plan. The requirement for AA is provided

under the EU Habitats Directive (Directive 1992/43/EEC).

The conclusion of the AA is that the Plan will not affect the integrity of the European Sites, alone or in combination with other plans or projects.²

The preparation of the Plan, SEA and AA has taken place concurrently and the findings of the AA have informed the SEA.

2.5 Strategic Flood Risk Assessment

A Strategic Flood Risk Assessment (SFRA) has been undertaken alongside the Plan. The requirement for SFRA is provided under 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' (Department of Environment and Office of Public Works, 2009) and associated Department of the Environment, Community and Local Government Circular PL2/2014. The recommendations from the SFRA were integrated into the Plan.

2.6 Consideration of Alternatives

Consideration of the environmental effects arising from a variety of different alternatives for the Plan (see Section 4) has contributed towards the protection and management of the environment within the Plan.

2.7 Integration of environmental considerations into Zoning of the Plan

Environmental considerations were integrated into the Plan's zoning through an interdisciplinary approach.

Zoning has been applied in a way that primarily seeks to achieve sustainable and compact growth, taking into account the

various requirements set out in the higher-level NPF and Eastern and Midland RSES.

The detailed Plan preparation process undertaken by the Planning Department combined with specialist input from the SFRA process sought to facilitate zoning that avoids inappropriate development being permitted in areas of high flood risk. Various provisions have been inserted into the Plan that provide for flood risk management at project level. Also taken into account were environmental sensitivities relating to ecology, cultural heritage, landscape and water.

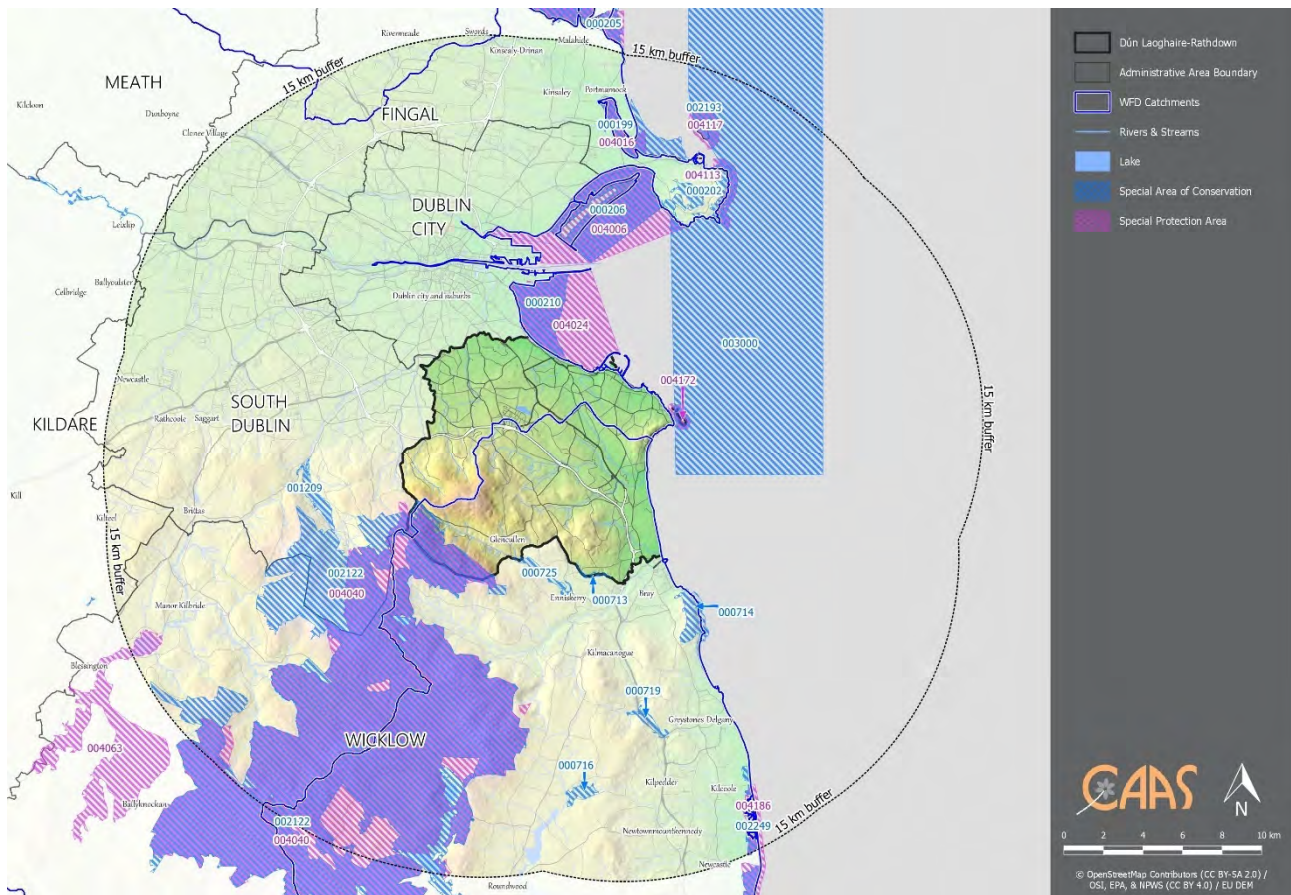
2.8 Integration of individual SEA, AA and SFRA provisions into the text of the Plan

Various provisions have been integrated into the text of the Plan through the Plan-preparation and SEA, SFRA and AA processes. Both the Planning and the assessment teams contributed towards the mitigation which was developed over multiple iterations and was informed by, inter alia, various communications through the SEA, AA and SFRA processes.

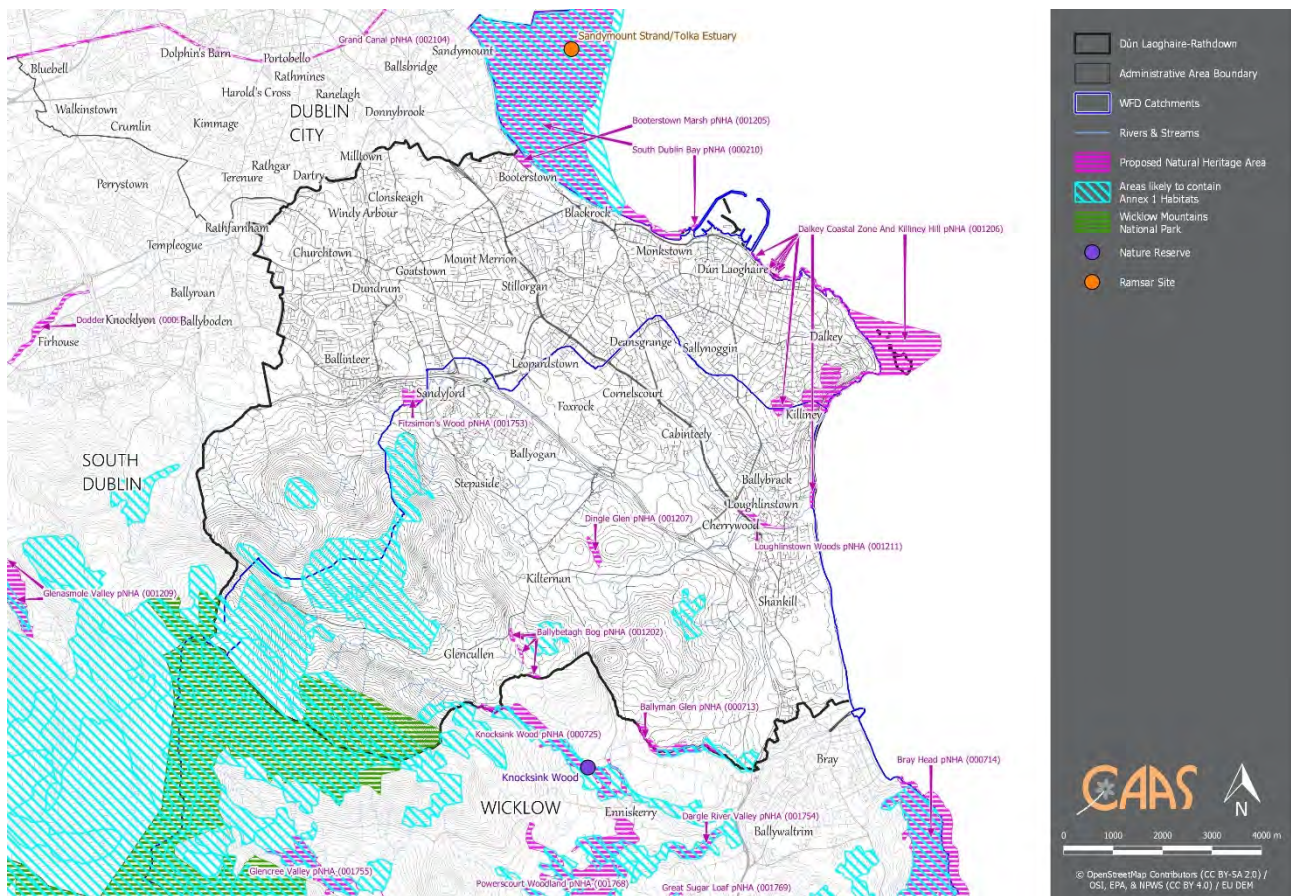
Table 2.1 links key mitigation measure(s) to the likely significant effects of implementing the Plan, if unmitigated. The measures generally benefit multiple environmental components i.e. a measure providing for the protection of biodiversity, flora and fauna could beneficially impact upon the minimisation of flood risk and the protection of human health, for example. Some of these measures, many of which were integrated into the current 2016-2022 Plan through the SEA and associated AA and SFRA processes for that Plan, have been retained and/or updated.

Some of the key provisions/part of provisions integrated into the Plan as a direct result of SEA and AA recommendations are detailed on Table 2.2.

² Except as provided for in Article 6(4) of the Habitats Directive, viz. There must be: (a) no alternative solution available, (b) imperative reasons of overriding public interest for the plan to proceed; and (c) adequate compensatory measures in place.

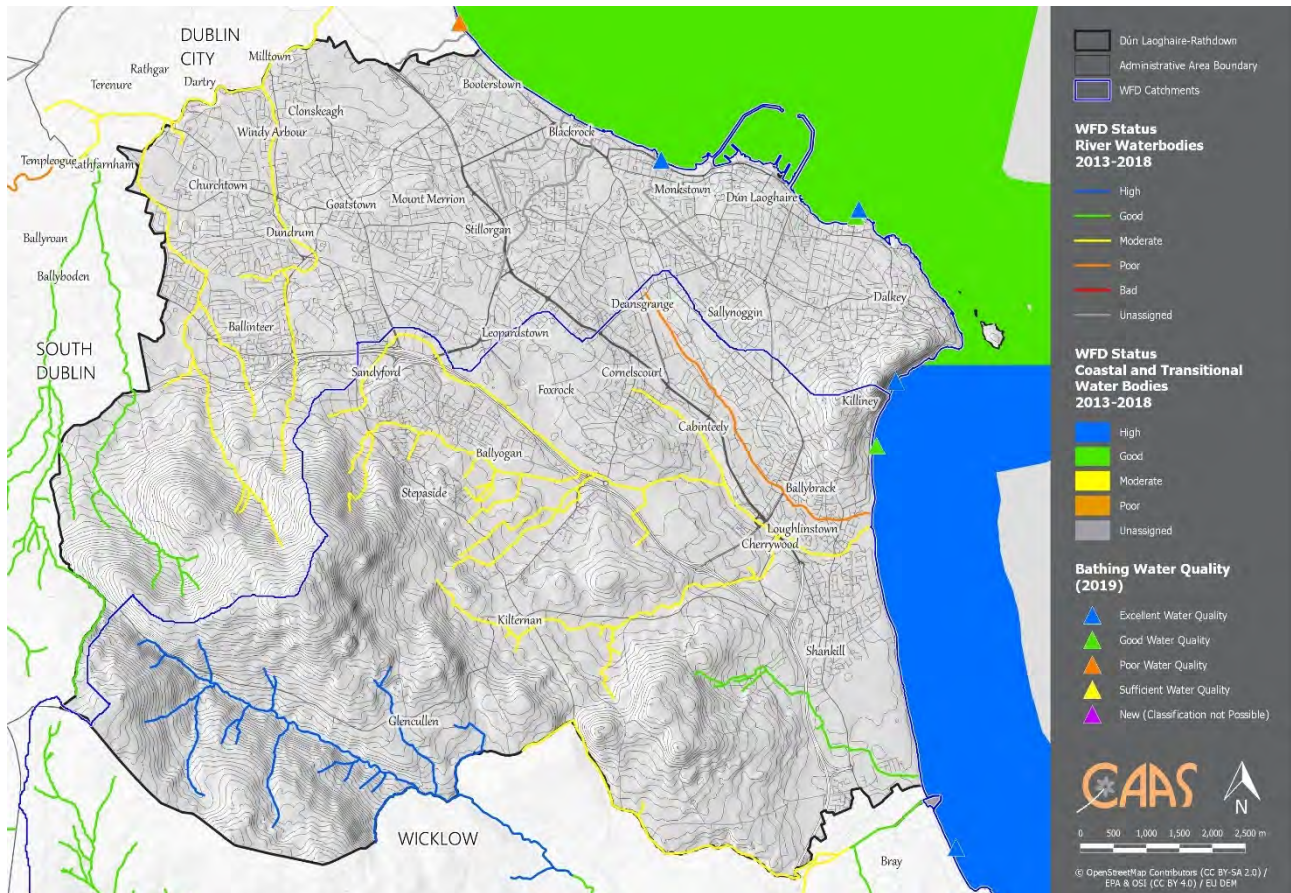


European Sites within and within 15 km of the County

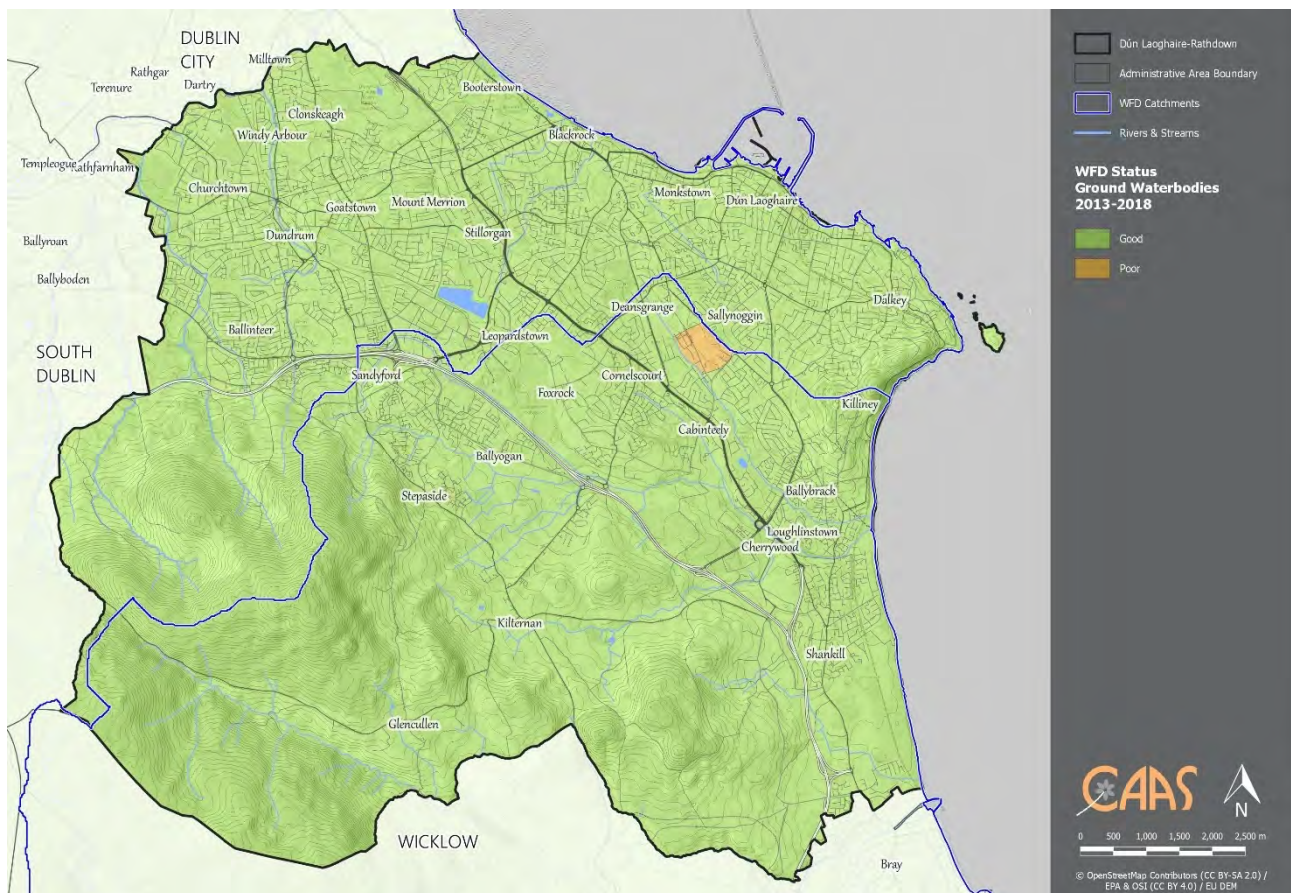


Proposed Natural Heritage Areas and Other Designations

Figure 2.1 Selection of Individual Environmental Sensitivities taken into account (1 of 3)

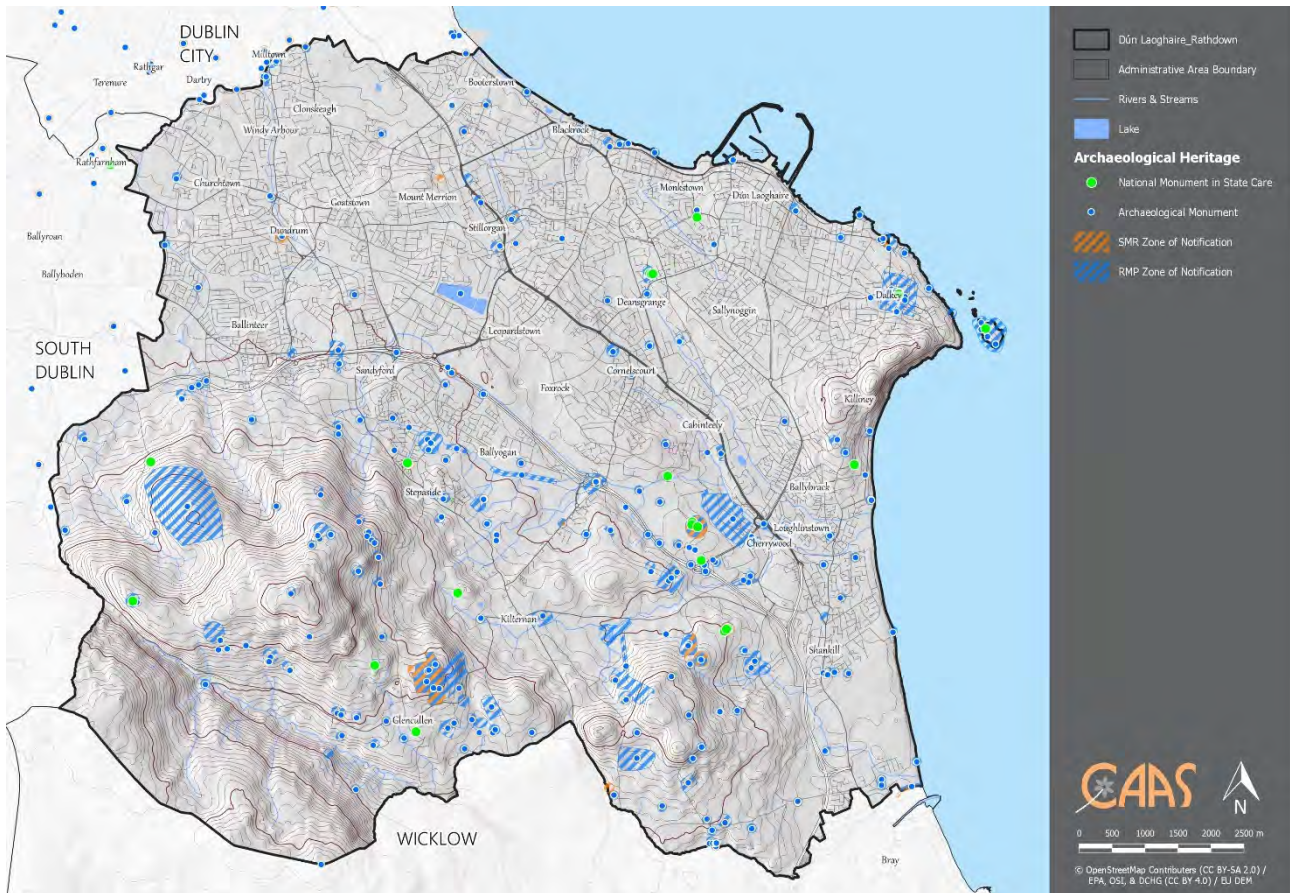


Surface Water Status

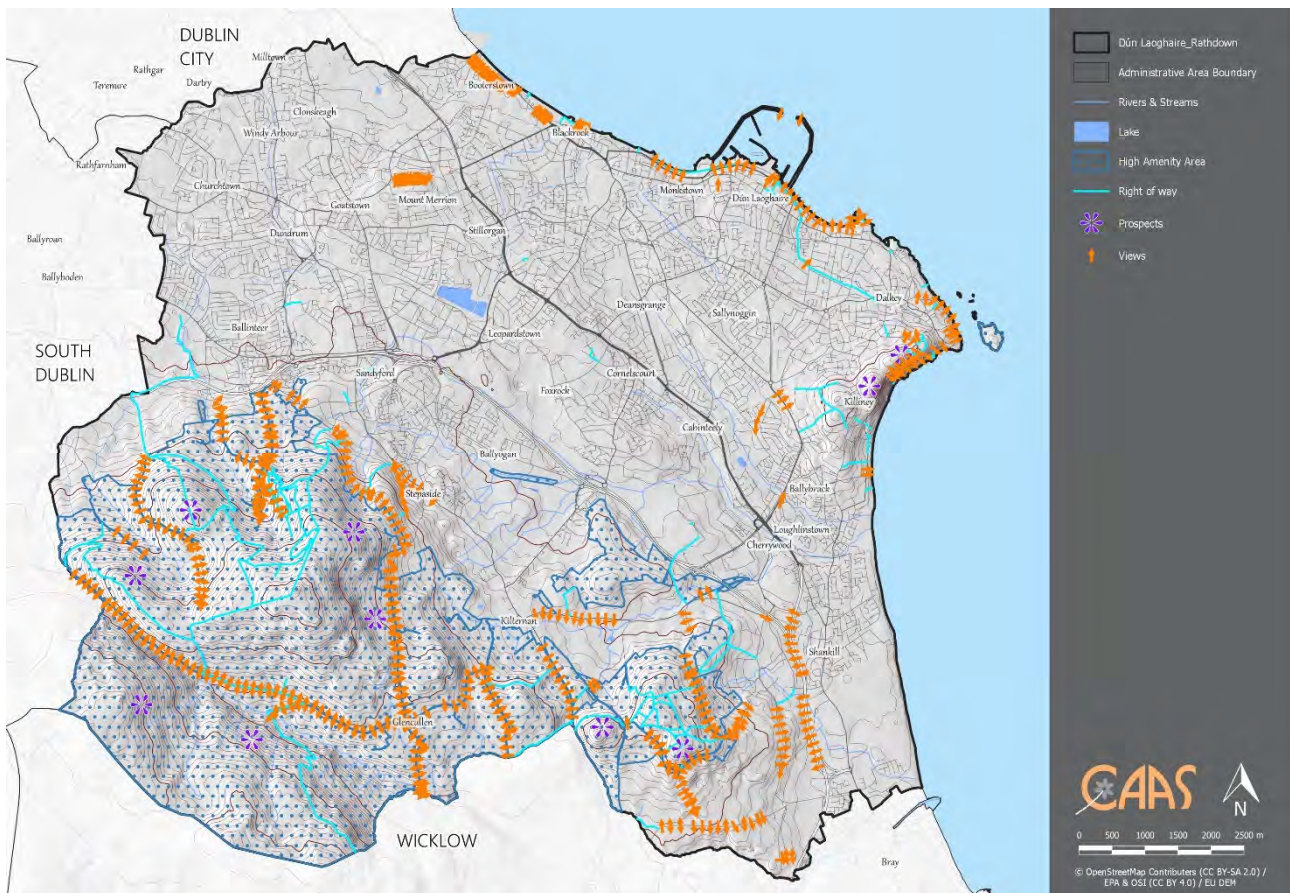


Groundwater Status

Figure 2.2 Selection of Individual Environmental Sensitivities taken into account (2 of 3)



Archaeological Designations



Landscape Designations

Figure 2.3 Selection of Individual Environmental Sensitivities taken into account (3 of 3)

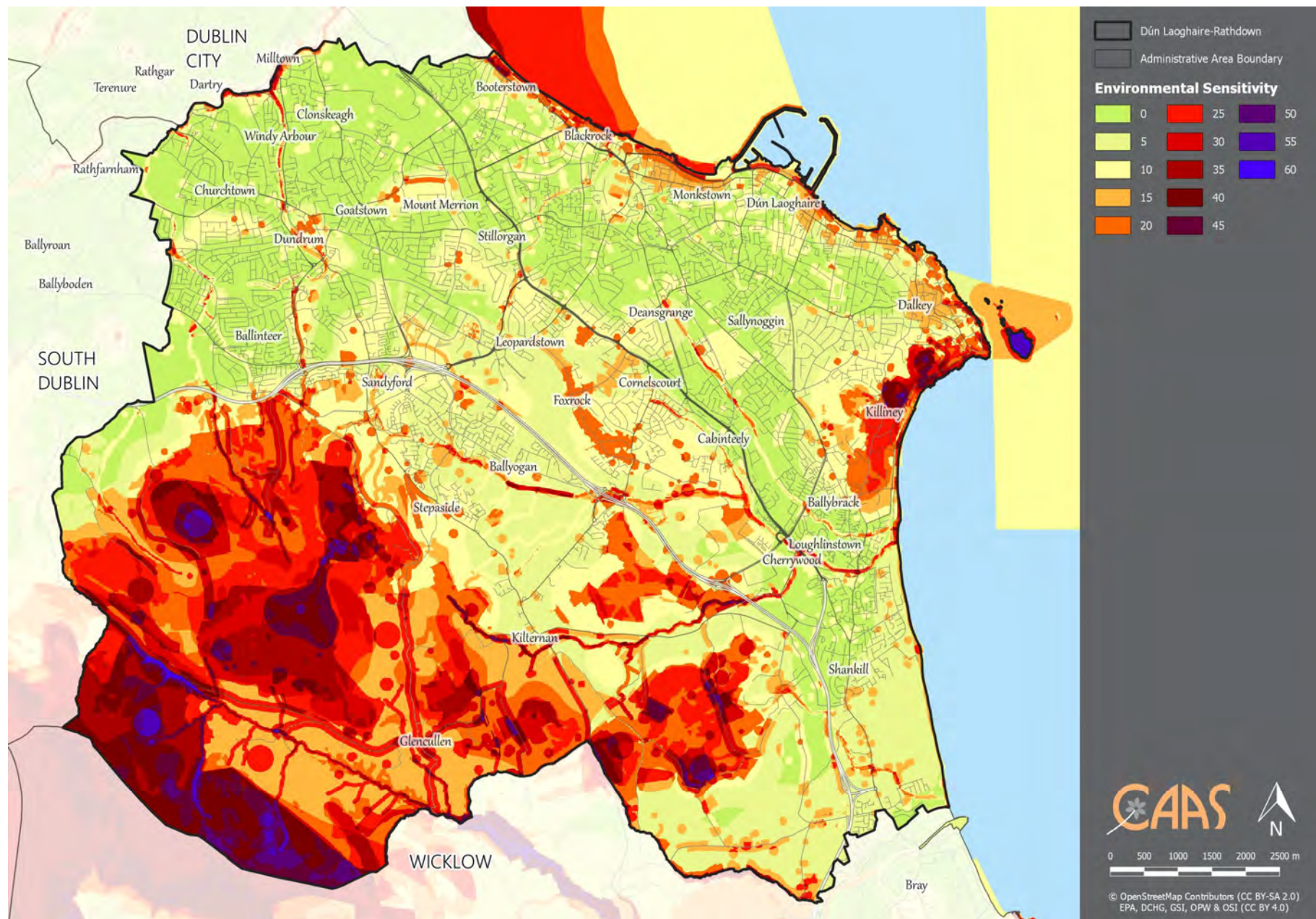


Figure 2.4 Overlay of Environmental Sensitivities

Table 2.1 Integration of Environmental Considerations into the Plan

Topic	Potentially Significant Adverse Effect, if Unmitigated	Recommendations integrated into the Plan, included in:
Various	Various	<p>Policy Objective T25: Environmental Assessment of New Roads It is a Policy Objective that where projects for new roads, identified under Section 5.8, are not already provided for by existing plans/programme or are not already permitted, that the feasibility of progressing these projects shall be examined, taking into account environmental sensitivities as identified in the SEA Environmental Report (including greenhouse gas emissions and other emissions to air) and the objectives of the Plan relating to sustainable mobility. A Corridor and Route Selection Process will be undertaken where appropriate, for relevant new road infrastructure in two stages: Stage 1 – Route Corridor Identification, Evaluation and Selection and Stage 2 – Route Identification, Evaluation and Selection. In implementing this Objective, the Council will comply with any national policy or guidelines issued relating to the assessment of greenhouse gas emissions and other emissions to air for new transport projects.</p>
Various	Various	<p>Special Local Objective 107 To co-operate with the National Transport Authority, Transport Infrastructure Ireland and Wicklow County Council in the establishment of a combined road across the County Brook Valley to provide connections between the proposed new development areas of Old Connaught and Fassaroe (Wicklow County). The Corridor and Route Selection Process outlined by Policy T25 should be followed</p>
Various	Various	<p>Green Infrastructure Policy Objective GIB1: Green Infrastructure Strategy It is a Policy Objective to continue to implement, and update, the DLR Green Infrastructure (GI) Strategy, to protect existing green infrastructure and encourage and facilitate, in consultation with relevant stakeholders, the development, design and management of high quality natural and semi-natural areas. This recognises the ecosystems approach and the synergies that can be achieved with regard to sustainable transport, provision of open space, sustainable management of water, protection and enhancement of biodiversity.</p>
Various	Various	<p>Policy Objective OSR7: Trees, Woodland and Forestry It is a Policy Objective to implement the objectives and policies of the Tree Policy and the forthcoming Tree Strategy for the County, to ensure that the tree cover in the County is managed, and developed to optimise the environmental, climatic and educational benefits, which derive from an 'urban forest', and include a holistic 'urban forestry' approach.</p>
Various	Various	<p>Policy Objective OSR8: Greenways and Blueways Network: It is a Policy Objective to develop a comprehensive network of County Greenways linking parks and public open spaces and to liaise with adjoining local authorities and other stakeholders to achieve and improve wider external linkages and corridors, to enable enhanced connectivity to wider strategic networks, and to allow for the long-term strategic expansion of urban areas (consistent with NPO 62 of the NPF).</p>
Various	Various	<p>Requirements under Chapter 12: Development Management, including those under the headings of: Impacts on the Environment</p> <ul style="list-style-type: none"> • Environmental Impact Assessment • Appropriate Assessment • Ecological Impact Assessment <p>Environmental Infrastructure</p> <ul style="list-style-type: none"> • Air Pollution • Noise Pollution • Noise, Odour and Vibration Generating Uses • Construction Management Plans • Hours of Construction • New Development/Change of Use - Environmental Impacts • Waste Management Infrastructure facilities and refuse transfer stations • Telecommunications • Development and Overhead Power Lines • Public lighting • Drainage and Water Supply • Flood Risk Management • Coastal Issues - Erosion/Flooding/ Recreation
Biodiversity and flora and fauna	<p>Arising from both construction and operation of development and associated infrastructure:</p> <ul style="list-style-type: none"> • Loss of/damage to biodiversity in designated sites (including European Sites and Wildlife Sites) and Annexed habitats 	<p>Policy Objective CS8 – Ecosystem Services Approach: It is a Policy Objective to promote an Ecosystem Services Approach in the preparation of lower-level Plans, Strategies and Development Management.</p> <p>Policy Objective T30: Street Lighting It is a Policy Objective to provide and maintain street lighting on the public road/footway/cycleways throughout the County in accordance with commonly accepted best practice, the Council's public lighting masterplan and the upgrade of sodium lights to LEDs.</p> <p>Policy Objective GIB7: National Marine Planning Framework (NMPF) It is a Policy Objective to support the policies and objectives as appropriate and relevant of the forthcoming National Marine Planning Framework (NMPF), with respect to the conservation, management, and protection for a sustainable future for the marine area.</p> <p>Policy Objective GIB10: Dublin Bay Biosphere It is a Policy Objective to participate, support and contribute to the management of the biosphere, along with its partners and to aim to raise awareness and education to people living, working and using the biosphere, through an Education Strategy. In furtherance of this Policy Objective DLR have contributed to the development of an Environmental Code of Practice for those working</p>

Topic	Potentially Significant Adverse Effect, if Unmitigated	Recommendations integrated into the Plan, included in:
	<p>and species, listed species, ecological connectivity and non-designated habitats; and disturbance to biodiversity and flora and fauna;</p> <ul style="list-style-type: none"> Habitat loss, fragmentation and deterioration, including patch size and edge effects; and Disturbance (e.g. due to noise and lighting along transport corridors) and displacement of protected species such as birds and bats. 	<p>in the Biosphere and all partners carry out conservation actions including gathering biodiversity data and monitoring within the biosphere.</p> <p>Policy Objective GIB11: Coastal Area Feasibility Study It is a Policy Objective to explore undertaking a comprehensive feasibility study on the recreational potential along the coastal area of the County which comprehensively addresses recreational impact - including visitor numbers, mapping and surveying of sensitive habitats and species and identification of significant threats on European sites - and which would allow an assessment of any future proposals, alone or in combination, to assess impact on the coastal and marine zone within and adjacent to the County boundary. The Council will explore the possibility of carrying out this study with adjoining and/or coastal Local Authorities and/or other agencies.</p> <p>Policy Objective GIB18: Protection of Natural Heritage and the Environment It is a Policy Objective to protect and conserve the environment including, in particular, the natural heritage of the County and to conserve and manage Nationally and Internationally important and EU designated sites - such as Special Protection Areas (SPAs), Special Areas of Conservations (SACs), proposed Natural Heritage Areas (pNHAs) and Ramsar sites (wetlands) - as well as non-designated areas of high nature conservation value known as locally important areas which also serve as 'Stepping Stones' for the purposes of Article 10 of the Habitats Directive.</p> <p>Policy Objective GIB19: Habitats Directive It is a Policy Objective to ensure the protection of natural heritage and biodiversity, including European sites that form part of the Natura 2000 network, in accordance with relevant EU Environmental Directives and applicable National Legislation, Policies, Plans and Guidelines.</p> <p>Policy Objective GIB20: Biodiversity Plan It is a Policy Objective to support the provisions of the forthcoming DLR County Biodiversity Action Plan, 2021 – 2025.</p> <p>Policy Objective GIB21: Designated Sites It is a Policy Objective to protect and preserve areas designated as proposed Natural Heritage Areas, Special Areas of Conservation, and Special Protection Areas. It is Council policy to promote the maintenance and as appropriate, delivery of 'favourable' conservation status of habitats and species within these areas.</p> <p>Policy Objective GIB22: Non-Designated Areas of Biodiversity Importance It is a Policy Objective to protect and promote the conservation of biodiversity in areas of natural heritage importance outside Designated Areas and to ensure that notable sites, habitats and features of biodiversity importance - including species protected under the Wildlife Acts 1976 and 2000, the Birds Directive 1979, the Habitats Directive 1992, Birds and Habitats Regulations 2011, Flora (Protection) Order, 2015, Annex I habitats, local important areas, wildlife corridors and rare species - are adequately protected. Ecological assessments will be carried out for all developments in areas that support, or have potential to support, features of biodiversity importance or rare and protected species and appropriate mitigation/ avoidance measures will be implemented. In implementing this policy regard shall be had to the Ecological Network including the forthcoming DLR Wildlife Corridor Plan and the recommendations and objectives of the Green City Guidelines (2008) and 'Ecological Guidance Notes for Local Authorities and Developers' (Dún Laoghaire- Rathdown Version 2014).</p> <p>Policy Objective GIB23: County-Wide Ecological Network It is a Policy Objective to protect the Ecological Network which will be integrated into the updated Green Infrastructure Strategy and will align with the DLR County Biodiversity Action Plan. Creating this network throughout the County will also improve the ecological coherence of the Natura 2000 network in accordance with Article 10 of the Habitats Directive. The network will also include non-designated sites.</p> <p>Policy Objective GIB24: Rivers and Waterways It is a Policy Objective to maintain and protect the natural character and ecological value of the river and stream corridors in the County and where possible to enhance existing channels and to encourage diversity of habitat and nature-based solutions that incorporate biodiversity features. It is also policy (subject to the sensitivity of the riverside habitat), to provide public access to riparian corridors, to promote improved passive recreational activities.</p> <p>Policy Objective GIB25: Hedgerows It is a Policy Objective to retain and protect hedgerows in the County from development, which would impact adversely upon them. In addition, the Council will promote the protection of existing site boundary hedgerows and where feasible require the retention of these when considering a grant of planning permission for all developments. The Council will promote the County's hedgerows by increasing coverage, where possible, using locally native species and to develop an appropriate code of practice for road hedgerow maintenance. The Council will promote the protection of existing hedgerows when considering a grant of planning permission for all developments.</p> <p>Policy Objective GIB26: Geological Sites It is a Policy Objective to protect, promote and preserve sites of Geological and Geomorphological importance, in particular the proposed Natural Heritage Areas (NHAs), and any County Geological Sites (CGS), that become designated during the lifetime of the Plan.</p> <p>Policy Objective GIB27: Green Belts It is a Policy Objective to retain the individual physical character of towns and development areas by the designation of green belt areas, where appropriate.</p> <p>Policy Objective GIB28: Invasive Species It is a Policy Objective to prepare an 'Invasive Alien Species Action Plan' for the County which will include actions in relation to invasive alien species (IAS) surveys, management and treatment and to also ensure that proposals for development do not lead to the spread or introduction of invasive species. If developments are proposed on sites where invasive species are or were previously present, the applicants will be required to submit a control and management program for the particular invasive species as part of the planning process and to comply with the provisions of the European Communities Birds and Habitats Regulations 2011 (S.I. 477/2011).</p> <p>Policy Objective GIB29: Nature Based Solutions It is a Policy Objective to increase the use of Nature Based Solutions (NBS) within the County and to promote and apply adaption and mitigation actions that favour NBS, which can have multiple benefits to the environment and communities. NBS has a role not only to meet certain infrastructure related needs (e.g. flooding management), and development needs, but also to maintain or benefit the quality of ecosystems, habitats, and species.</p> <p>Policy Objective OSR11: Water-Based Sports It is a Policy Objective to support and encourage water-based sports and maritime leisure activities along the coast subject to Council Bye-Laws, and the Habitats and Birds Directives. The County features seventeen kilometres of coastline, which is a valuable asset. If utilised to its full potential it can contribute to the health and well-being of the residents of, and workers, in the</p>

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		<p>County and will increase sport and physical activity participation levels locally. These activities can also offer significant potential for tourism growth.</p> <p>Policy Objective E11: Sustainable Management of Water It is a Policy Objective to work with Irish Water:</p> <ul style="list-style-type: none"> • To ensure the efficient and sustainable use and development of water resources and water services infrastructure in order to manage and conserve water in a manner that supports climate action, the circular economy, a healthy society and protection of the environment. (Consistent with NSO 9 of the NPF, RSO 7, RPO 10.1 of the RSES) • To continue the development and improvement of the water supply and wastewater systems throughout Dún Laoghaire-Rathdown in order to meet the anticipated water and wastewater requirements of the County. • To ensure facilities comply with the Water Framework Directive and the River Basin Management Plan or any updated version of the document, 'Water Quality in Ireland 2013-2018'(2019) or any updated version of the document, Pollution Reduction Programmes for Designated Shellfish Areas, the Urban Waste Water Treatment Directive and the Habitats Directive. <p>Policy Objective E17: Water Supply and Wastewater treatment and Appropriate Assessment It is a Policy Objective to require that all developments relating to water supply and wastewater treatment are subject to screening for Appropriate Assessment to ensure there are no likely significant effects on the integrity, defined by the structure and function, of any Natura 2000 sites and that the requirements of Article 6 of the EU Habitats Directive are met. (Consistent with RPO 10.7 of the RSES).</p> <p>Policy Objective E18: Groundwater Protection and Appropriate Assessment It is a Policy Objective to ensure the protection of the groundwater resources in and around the County and associated habitats and species in accordance with the Groundwater Directive 2006/118/EC and the European Communities Environmental Objectives (Groundwater) Regulations, 2010. In this regard, the Council will support the implementation of Irish Water's Water Safety Plans to protect sources of public water supply and their contributing catchment.</p> <p>Special Local Objective 18 To promote the development of the Sutton to Sandycove Promenade and Cycleway, as a component part of the National East Coast Trail Cycle Route and also the Dublin Bay trail from the boundary with Dublin City up to the boundary with Co. Wicklow. Any development proposal will protect and enhance public access to the coast where feasible. 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 SACs, SPAs, and pNHA(s) in Dublin Bay and the surrounding area</p> <p>Special Local Objective 35 To promote Water Leisure Facilities for public use at the coastal fringe of the Gut and rear of the West Pier, subject to the appropriate environmental assessments including any assessment required under the Habitats Directive in co-operation with the relevant agencies.</p> <p>Special Local Objective 115 - To provide an open seawater pool as a part of any future phase of the development at the Dún Laoghaire Baths site. This provision shall take into account environmental feasibility, including ecological, water and cultural heritage sensitivities. Any proposals shall be subject to Appropriate Assessment Screening in accordance with the requirements of the EU Habitats Directive and shall ensure the protection and preservation of all designated SACs, SPAs, and pNHA(s) in Dublin Bay and the surrounding area.</p> <p>Special Local Objective 116 - To provide a cultural and heritage centre in the environs of the Dún Laoghaire Harbour that focusses on the unique history of emigration from the Carlisle Pier, the construction of the harbour, the role of the harbour in the development of amateur watersports and the celebration of the first suburban rail line and mail boat service. Any proposals shall be subject to Appropriate Assessment Screening in accordance with the requirements of the EU Habitats Directive and shall ensure the protection and preservation of all designated SACs, SPAs, and pNHA(s) in Dublin Bay and the surrounding area.</p> <p>Special Local Objective 117 - The feasibility of incorporating the East Coast Cycle Trail into any coastal protection works required between Corbawn Lane and the proposed DART station at Woodbrook should be investigated. Such works shall be carried out in accordance with the recommendations of the Coastal Defence Strategy (2010) or any future Strategy. Any proposals shall be subject to Appropriate Assessment Screening in accordance with the requirements of the EU Habitats Directive and shall ensure the protection and preservation of all designated SACs, SPAs, and pNHA(s) in Dublin Bay and the surrounding area.</p> <p>Requirements under Chapter 12: Development Management, including those under the headings of:</p> <p>Impacts on the Environment</p> <ul style="list-style-type: none"> • Environmental Impact Assessment • Appropriate Assessment • Ecological Impact Assessment <p>Green Infrastructure and Biodiversity</p> <ul style="list-style-type: none"> • Green Infrastructure • Biodiversity • Sensitive Landscapes and Site Features • High Amenity Landscapes, Views and Prospects • Fencing of Hitherto Open Land <p>Construction Management Plan requirements under Plan Sections 12.9.4 to 12.9.6</p> <p>References to the protection of European sites/Appropriate Assessment or the Habitats Directive in the detailed text under:</p> <ul style="list-style-type: none"> • Policy Objective T13: Coastal Cycling Infrastructure Objective • Policy Objective T23: Roads and Streets • Policy Objective GIB10: Dublin Bay Biosphere • Policy Objective GIB18: Protection of Natural Heritage and the Environment • Policy Objective GIB19: Habitats Directive • Policy Objective GIB21: Designated Sites • Policy Objective GIB23: County-Wide Ecological Network

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		<ul style="list-style-type: none"> Policy Objective GIB24: Rivers and Waterways Policy Objective EI3: Wastewater Treatment Systems Policy Objective EI22: Flood Risk Management Policy Objective OSR8: Greenways and Blueways Network: <p>Requirements under Chapter 13 Land Use Zoning Objectives, under the heading of Appropriate Assessment</p> <p>SLO 151 To provide for a number of holiday caravan/camping facilities within a 1km radius of the cross roads at Glencullen subject to the following: ensuring that there is not an over proliferation of such facilities, ensuring any proposals do not undermine the overall zoning objective, ensuring proposals do not have a negative impact on the source protection area or sensitive watercourses as identified in the Glencullen Local Area Plan and/or in section 10.2.2.5 of this Plan and ensuring that the development (including any resultant increases in visitor numbers and/or behaviour) does not affect the integrity of the Knocksink Wood Special Area of Conservation. Each facility shall be limited to a total of 10 pitches (combination of pods, glamping, tents, camper vans) and any glamping pods shall be commensurate in size and scale to a tent/camper van so as to avoid any negative visual impact on the landscape.</p>
Population and human health	<ul style="list-style-type: none"> Potential adverse effects arising from flood events. Potential interactions if effects arising from environmental vectors. 	<p>Also see measures under other environmental components including Soil, Water and Air and Climatic Factors.</p> <p>Policy Objective T27: Traffic Noise It is a Policy Objective to ensure that traffic noise levels are considered as part of new developments along major roads/rail lines in accordance with best practice guidelines.</p> <p>Policy Objective EI14: Air and Noise Pollution It is a Policy Objective:</p> <ul style="list-style-type: none"> To implement the provisions of national and EU Directives on air and noise pollution and other relevant legislative requirements in conjunction with other agencies as appropriate. (Consistent with RPO 10.10 of the RSES) To maintain and manage a Dublin County ambient air quality monitoring network in conjunction with the EPA and TII and to make available to the public the resulting air quality measurements via the EPA website www.epa.ie/air/quality. To support the implementation of objectives of the 'Dublin Agglomeration Environmental Noise Action Plan 2018-2023'. <p>Policy Objective EI15: Light Pollution It is a Policy Objective to ensure that the design of external lighting schemes minimise the incidence of light spillage or pollution in the immediate surrounding environment and has due regard to the residential amenity of surrounding areas.</p> <p>Policy Objective EI16: Water Pollution It is a Policy Objective to implement the provisions of water pollution abatement measures in accordance with national and EU Directives and other legislative requirements in conjunction with other agencies as appropriate.</p> <p>Policy Objective EI17: Major Accidents It is a Policy Objective to have regard to the provisions of the Major Accidents Directive (European Council Directive 2012/110/EU). This Directive relates to the control of major accident hazards involving dangerous substances and its objectives are to prevent major accidents and limit the consequences of such accidents.</p>
Soil	<ul style="list-style-type: none"> Potential adverse effects on the hydrogeological and ecological function of the soil resource, including as a result of development on contaminated lands. Potential for riverbank and coastal erosion. 	<p>Also see measures under other environmental components including Water.</p> <p>Coastal Protection Policy Objective EI24: Coastal Defence It is a Policy Objective to implement and have regard to the recommendations of the Coastal Defence Strategy (2010) for the County where feasible. The Council will endeavour to (i) obtain funding from the OPW in order to undertake defence measures for specific areas as prioritised in the Strategy (ii) become part of any future national OPW Coastal Monitoring Survey Programme. Where feasible and appropriate the Council will endeavour to incorporate leisure and transport objectives with coastal protection.</p> <p>12.9.6 New Development/Change of Use - Environmental Impacts 12.9.6 New Development/Change of Use - Environmental Impacts, including: Where brownfield redevelopment is proposed, require adequate and appropriate investigations to be carried out into the nature and extent of any soil and groundwater contamination and the risks associated with site development work.</p>
Water	<ul style="list-style-type: none"> Potential adverse effects upon the status of water bodies and entries to the WFD Register of Protected Areas (ecological and human value), arising from changes in quality, flow and/or morphology. Increase in flood risk and associated effects associated with flood events. 	<p>Also see measures under other environmental components including Soil and Material Assets.</p> <p>Policy Objective EI5: River Basin Management Plans (RMBPs) It is a Policy Objective:</p> <ul style="list-style-type: none"> To ensure the delivery of the relevant policies and objectives of the River Basin Management Plan for Ireland 2018 – 2021 and any subsequent plan, including those relating to protection of water status, improvement of water status, prevention of deterioration and meeting objectives for designated protected sites. To support Irish Water in its implementation of Water Quality Management Plans for ground, surface, coastal and estuarine waters as part of the implementation of the EU Water Framework Directive. To support Irish Water in the development of Drinking Water Protection Plans. <p>Policy Objective EI8: Groundwater Protection and Appropriate Assessment It is a Policy Objective to ensure the protection of the groundwater resources in and around the County and associated habitats and species in accordance with the Groundwater Directive 2006/118/EC and the European Communities Environmental Objectives (Groundwater) Regulations, 2010. In this regard, the Council will support the implementation of Irish Water's Water Safety Plans to protect sources of public water supply and their contributing catchment.</p> <p>Policy Objective EI16: Water Pollution It is a Policy Objective to implement the provisions of water pollution abatement measures in accordance with national and EU Directives and other legislative requirements in conjunction with other agencies as appropriate.</p>

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		<p>Flood Risk Policy Objective EI21: Catchment Flood Risk Assessment and Management (CFRAM) It is a Policy Objective to assist the Office of Public Works (OPW) in the design and construction of flood relief schemes approved in the ten-year Programme of Investment in Flood Relief Measures following from the recommendations and outputs of the CFRAM for the Eastern District that are relevant for DLR.</p> <p>Policy Objective EI22: Flood Risk Management It is a Policy Objective to support, in cooperation with the OPW, the implementation of the EU Flood Risk Directive (2001/60/EC) on the assessment and management of flood risks, the Flood Risk Regulations (SI No 122 of 2010) and the Department of the Environment, Heritage and Local Government and the Office of Public Works Guidelines on 'The Planning System and Flood Risk Management' (2009) and relevant outputs of the Eastern District Catchment and Flood Risk Assessment and Management Study (ECFRAMS Study). Implementation of the above shall be via the policies and objectives, and all measures to mitigate identified flood risk, including those recommended under part 3 (flood risk considerations) of the Justification Tests, in the Strategic Flood Risk Assessment set out in Appendix 15 of this Plan.</p> <p>Policy Objective EI23: Cross Boundary Flood Management It is a Policy Objective to work with neighbouring Local Authorities when developing cross boundary flood management work programmes and when considering cross boundary development.</p>
Air and Climatic Factors	<ul style="list-style-type: none"> Potential conflict between development under the Plan and aiming to reduce carbon emissions in line with local, national and European environmental objectives. Potential conflicts between transport emissions, including those from cars, and air quality. Potential conflicts between increased frequency of noise emissions and protection of sensitive receptors. Potential conflicts with climate adaptation measures including those relating to flood risk management. 	<p>Also refer to: Section Error! Reference source not found. "Error! Reference source not found.", various sustainable mobility and transport provisions in Chapters 5 and 12 of the Plan and the overall approach to compact development and sustainability provided by the Plan</p> <p>Policy Objective CA1: National Climate Action Policy It is a Policy Objective to support the implementation of International and National objectives on climate change including the 'Climate Action Plan 2021 Securing Our Future', the 'National Adaptation Framework' 2018, the 'National Energy and Climate Plan 2021-2030', and take account of the 'Climate Action and Low Carbon Development (Amendment) Act 2021', and subsequent updates, other relevant policy, Guidelines and legislation, that support the climate action policies included in the County Development Plan.</p> <p>Policy Objective CA2: Regional Climate Action It is a Policy Objective to work closely with the Eastern Midland Regional Authority (EMRA) the Dublin Metropolitan Climate Action Regional Office (Dublin CARO), City of Dublin Energy Management Agency (Codema) and the Sustainable Energy Authority of Ireland (SEAI) to achieve the climate action policies and objectives set out in the Eastern and Midland Region Spatial and Economic Strategy (consistent with RPO 3.1, 36, 7.4, 7.30, 7.31, 7.32, 7.33, 7.35, 7.38, 7.40, 7.42, 7.43, 7.7 of the RSES).</p> <p>Policy Objective CA3: Measuring Greenhouse Gas Impacts It is a Policy Objective that spatial and infrastructure planning are consistent with climate mitigation and adaptation objectives. When it is available, the Council will be informed by the work led by the Eastern and Midland Regional Assembly to develop a methodology for quantifying the GHG impacts of spatial planning policies, (QGasSP, an ESPON EU research programme) and the forthcoming Development Plan Guidelines or other national guidance as appropriate. The Council will quantify the GHG impacts for this County Development Plan when EMRA guidelines become available and also ensure the Development Plan is consistent with the approach to climate action recommended in any forthcoming revised Section 28 Development Plan Guidelines or other relevant guidelines and if necessary, vary the development plan "(Consistent with NPO 54 of the NPF and RPO 3.6 of the RSES).</p> <p>Policy Objective CA4: Dún Laoghaire Rathdown County Council Climate Change Action Plan 2019-2024 (DLR CCAP) It is a Policy Objective to implement and take account of the Dún Laoghaire-Rathdown County Council Climate Change Action Plan 2019 - 2024 (DLR CCAP), to take account of the 'Climate Action and Low Carbon Development (Amendment) Act 2021', and subsequent updates of both and to transition to a climate resilient low carbon County. (Consistent with SO8 of the NPF, RPO 7.32, 7.33 of the RSES).</p> <p>Policy Objective CA5: Energy Performance in Buildings It is a Policy Objective to support high levels of energy conservation, energy efficiency and the use of renewable energy sources in existing and new buildings, including retro fitting of energy efficiency measures in the existing building stock.</p> <p>Policy Objective CA6: Retrofit and Reuse of Buildings It is a Policy Objective to require the retrofitting and reuse of existing buildings rather than their demolition and reconstruction where possible recognising the embodied energy in existing buildings and thereby reducing the overall embodied energy in construction as set out in the Urban Design Manual (Department of Environment Heritage and Local Government, 2009). (Consistent with RPO 7.40 and 7.41 of the RSES).</p> <p>Policy Objective CA7: Construction Materials It is a Policy Objective to support the use of structural materials in the construction industry that have low to zero embodied energy and CO2 emissions. (Consistent with the RPO 7.41 of the RSES)</p> <p>Policy Objective CA8: Sustainability in Adaptable Design It is a Policy Objective to promote sustainable approaches to the improvement of standards for habitable accommodation, by allowing dwellings to be flexible, accessible and adaptable in their spatial layout and design.</p> <p>Policy Objective CA9: Radon Gas It is a Policy Objective, in partnership with other relevant agencies, to promote best practice in the implementation of radon prevention measures.</p> <p>Policy Objective CA10: Renewable Energy It is a Policy Objective to support County, Regional, National and International initiatives and pilot schemes to encourage the development and use of renewable energy sources, including the SEAI Sustainable Energy Community initiatives, as a means of transitioning to a low carbon climate resilient County in line with national renewable energy targets.</p> <p>Policy Objective CA11: Onshore and Offshore Wind Energy and Wave Energy It is a Policy Objective to support in conjunction with other relevant agencies, wind energy initiatives, both on-shore and offshore, and wave energy, and onshore grid connections and reinforcements to facilitate offshore renewable energy development when these are undertaken in an environmentally acceptable manner. (Consistent with NSO 8 and NPO 42 of the NPF and</p>

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		<p>RPO 7.36 and 10.24 of the RSES).</p> <p>Policy Objective CA12: Small-Scale Wind Energy Schemes It is a Policy Objective to encourage small-scale wind energy developments and support small community-based proposals provided they do not negatively impact upon the environmental quality or amenity of the area, as a renewable energy resource which can contribute to the transition to a low carbon climate resilient County.</p> <p>Policy Objective CA13: Solar Energy Infrastructure It is a Policy Objective to encourage and support the development of solar energy infrastructure, including photo voltaic (PV) and solar thermal and seasonal storage facilities infrastructure in appropriate locations, as a renewable energy resource which can contribute to the transition to a low carbon climate resilient County. It is also a policy objective to support Ireland's renewable energy commitments by facilitating utility scale PV installations for the production of electricity provided they do not negatively impact upon the environmental quality, amenity or heritage of the area.</p> <p>Policy Objective CA14: Energy Storage Systems It is Policy Objective to support the use of efficient energy storage systems and infrastructure that supports energy efficiency and reusable energy system optimization, in accordance with proper planning and sustainable development when these are undertaken in an environmentally acceptable manner.</p> <p>Policy Objective CA15: District Heating It is a Policy Objective to support the development of district heat networks and the utilisation of waste heat recovery in the County as a renewable or low energy resource which can contribute to the transition to a low carbon climate resilient County. The Planning Authority will support the development of a Council wide District Heat policy following on from the forthcoming National Policy Framework for District Heat. (Consistent with RPO 7.38 of the RSES)</p> <p>Policy Objective CA16: Low Emission Vehicles It is a Policy Objective to support and facilitate the rollout of alternative low emission fuel infrastructure through the Development Management process, prioritising electric vehicle infrastructure.</p> <p>Policy Objective CA17: Electric Vehicles It is a Policy Objective to support, the Government's Electric Transport Programme by progressively electrifying our mobility systems by facilitating the rollout of Electric Powered Vehicle Recharging Parking Bays across the County and on public roads and other suitable location. The provision of e-bike chargers will be supported subject to the availability of Funding. (Consistent with NSO 4 of the NPF and RPO 7.42 of RSES)</p> <p>Policy Objective CA18: Urban Greening It is a Policy Objective to retain and promote urban greening - as an essential accompanying policy to compact growth - which supports the health and wellbeing of the living and working population, building resilience to climate change whilst ensuring healthy placemaking. Significant developments shall include urban greening as a fundamental element of the site and building design incorporating measures such as high quality biodiverse landscaping (including tree planting), nature based solutions to SUDS and providing attractive routes and facilities for the pedestrian and cyclist (Consistent with RPO 7.6, 7.22, 7.23, 9.10 of the RSES).</p> <p>Policy Objective CA19: Community Woodlands It is a policy objective to promote and support Community Woodland Schemes in line with government policy</p> <p>Policy Objective T27: Traffic Noise It is a Policy Objective to ensure that traffic noise levels are considered as part of new developments along major roads/rail lines in accordance with best practice guidelines.</p> <p>Policy Objective EI14: Air and Noise Pollution It is a Policy Objective: <ul style="list-style-type: none"> • To implement the provisions of national and EU Directives on air and noise pollution and other relevant legislative requirements in conjunction with other agencies as appropriate. (Consistent with RPO 10.10 of the RSES) • To maintain and manage a Dublin County ambient air quality monitoring network in conjunction with the EPA and TII and to make available to the public the resulting air quality measurements via the EPA website www.epa.ie/air/quality. • To support the implementation of objectives of the 'Dublin Agglomeration Environmental Noise Action Plan 2018-2023'. </p>
Material Assets	<ul style="list-style-type: none"> • Failure to provide adequate and appropriate waste water treatment (water services infrastructure and capacity ensures the mitigation of potential conflicts). • Failure to adequately treat surface water run-off that is discharged to water bodies (water services infrastructure and capacity ensures the 	<p>Also see measures under other environmental components including Population and Human Health, Cultural Heritage, Soil, Water, Air and various Land Use Zoning provisions from the Plan.</p> <p>Policy Objective T26: Traffic and Transport Assessments and Road Safety Audits It is a Policy Objective to require Traffic and Transport Assessments and/or Road Safety Audits for major developments – in accordance with the TII's 'Traffic and Transport Assessment Guidelines' (2014) - to assess the traffic impacts on the surrounding road network and provide measures to mitigate any adverse impacts - all in accordance with best practice guidelines.</p> <p>Policy Objective T29: Traffic Management It is a Policy Objective to introduce Traffic Management Schemes on particular roads and in appropriate areas throughout the County to reduce vehicle speeds to an acceptable level and to reduce the potential for traffic congestion and associated vehicular emissions in urban areas.</p> <p>Policy Objective EI1: Sustainable Management of Water It is a Policy Objective to work with Irish Water: <ul style="list-style-type: none"> • To ensure the efficient and sustainable use and development of water resources and water services infrastructure in order to manage and conserve water in a manner that supports climate action, the circular economy, a healthy society and protection of the environment. (Consistent with NSO 9 of the NPF, RSO 7, RPO 10.1 of the RSES) • To continue the development and improvement of the water supply and wastewater systems throughout Dún Laoghaire-Rathdown in order to meet the anticipated water and wastewater requirements of the County. • To ensure facilities comply with the Water Framework Directive and the River Basin Management Plan or any updated version of the document, 'Water Quality in Ireland 2013-2018'(2019) or any updated version of the document, Pollution Reduction Programmes for Designated Shellfish Areas, the Urban Waste Water Treatment Directive and the Habitats Directive. </p>

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	<p>mitigation of potential conflicts).</p> <ul style="list-style-type: none"> Failure to comply with drinking water regulations and serve new development with adequate drinking water (water services infrastructure and capacity ensures the mitigation of potential conflicts). Increases in waste levels. Potential impacts upon public assets and infrastructure. Potential interactions at local level between agricultural waste and soil, water, biodiversity and human health – including nitrogen deposition as a result of agricultural activities. However, this is likely to be a less significant issue at County level due to low levels of intensive agriculture. 	<p>Policy Objective EI2: Irish Water Enabling Policies Irish Water's Plans and Programmes It is a Policy Objective - in conjunction with the Eastern and Midland Regional Authority, where appropriate - to work with and support Irish Water in the delivery of the strategic objectives and strategic water and wastewater projects and infrastructure as set out in the 'Water Services Strategic Plan' (2015), any subsequent plan, Irish Water's Capital Investment Plan 2020 – 2024, any subsequent Capital Investment Plans and the forthcoming National Water Resources Plan, so as to ensure provision of infrastructure to service settlements in accordance with the Core Strategy of this Plan, and the settlement strategy of the RSES. (Consistent with RPO 10.2, 10.3, 10.11, 10.16 of the RSES)</p> <p>Reducing Leakage It is a Policy Objective to work with Irish Water to reduce leakage in accordance with any forthcoming Irish Water Regional Water Conservation Strategy. (Consistent with RPO 10.4 of the RSES)</p> <p>Water and Wastewater Network Design and Construction It is a Policy Objective to support the provision of integrated and sustainable water services through consultation with Irish Water on the layout and design of water services in relation to the selection and planning of development areas and the preparation of plans.</p> <p>Promote Water Conservation It is a Policy Objective in conjunction with Irish Water to promote and support water conservation and demand management measures among all water users in existing and new developments. (Consistent with NSO 9 of the NPF, RSO 7 and RPO 10.1 of the RSES)</p> <p>Policy Objective EI3: Wastewater Treatment Systems It is a Policy Objective that all new developments in areas served by a public foul sewerage network connect to the public sewerage system, either directly or indirectly. It is a Policy Objective to promote the changeover from septic tanks to collection networks where this is feasible and to strongly discourage the provision of individual septic tanks and domestic wastewater treatment systems in order to minimise the risk of ground and surface water pollution. It is a Policy Objective to prohibit multiple dwelling units discharging to communal wastewater treatment systems. Consideration of single dwelling domestic wastewater treatment systems in those areas not served by a public foul sewerage system will be subject to full compliance with the EPA Code of Practice Domestic Wastewater Treatment Systems (Population Equivalent ≤ 10) (March 2021), as may be amended or updated. Consideration of non-domestic wastewater treatment systems in those areas not served by a public foul sewerage system will be subject to full compliance with EPA Wastewater Treatment Manuals ('Treatment Systems for Small Communities, Business, Leisure Centres and Hotels')." Wastewater treatment systems shall be located entirely within the site boundary. The Council will liaise with Irish Water to ensure compliance with existing licenses, the Urban Waste water Directive and the EU Habitats Directive. See section 12.10.3 Waste Water Treatment Systems for detailed requirements.</p> <p>Policy Objective EI4: Water Drainage Systems It is a Policy Objective to require all development proposals to provide a separate foul and surface water drainage system – where practicable. (Consistent with RPO 10.12)</p> <p>Policy Objective EI6: Sustainable Drainage Systems It is a Policy Objective to ensure that all development proposals incorporate Sustainable Drainage Systems (SuDS).</p> <p>Policy Objective EI7: Water Supply and Wastewater treatment and Appropriate Assessment It is a Policy Objective to require that all developments relating to water supply and wastewater treatment are subject to screening for Appropriate Assessment to ensure there are no likely significant effects on the integrity, defined by the structure and function, of any Natura 2000 sites and that the requirements of Article 6 of the EU Habitats Directive are met. (Consistent with RPO 10.7 of the RSES).</p> <p>Policy Objective EI9: Drainage Impact Assessment It is a Policy Objective to ensure that all new developments prepare a Drainage Impact Assessment that meets the requirements of the Council's Development Management Thresholds Information Document (see Appendix 3) and the Stormwater Management Policy (See Appendix 7.1).</p> <p>Policy Objective EI10: Storm Overflows of Sewage to Watercourses It is a Policy Objective to work alongside Irish Water to minimise the number and frequency of storm overflows of sewage to watercourses and to establish, in co-operation with the adjoining Local Authorities and Irish Water, a consistent approach to the design, improvement and management of these intermittent discharges to ensure that the needs of the Region's receiving waters are met in a cost effective manner.</p> <p>Section 12.10.3 Waste Water Treatment Systems 12.10.3.1 Single dwelling domestic wastewater treatment systems Consideration of single dwelling domestic wastewater treatment systems in those areas not served by a public foul sewerage system will be subject to full compliance with the EPA Code of Practice Domestic Wastewater Treatment Systems (Population Equivalent ≤ 10) (March 2021), as may be amended or updated. A site suitability assessment shall be undertaken in accordance with the EPA Code of Practice Domestic Wastewater Treatment Systems (Population Equivalent ≤ 10) (March 2021), for new systems or upgrades of a system on an existing house. In addition, for new development(s) located in areas of "high" to "extreme" groundwater vulnerability (this includes areas in Rathmichael, Kiltiernan and Glencullen and may include other areas in the County) and where the provision of a single wastewater density of Domestic Wastewater Treatment Systems (DWWTS) results in a density of higher than 6 per hectare further assessment is required including:</p> <ul style="list-style-type: none"> The potential impact of the proposed system should be further assessed to show that the accumulative loading would not have a negative impact on groundwater quality, particularly with respect to E. coli and nitrate. In such cases, more detailed hydrogeological investigations should be carried out by a competent and experienced hydrogeologist to demonstrate that the site is suitable for a DWWTS. Particular attention should also be paid to the potential impact that the proposed DWWTSs may have on watercourses, drains/ditches, ponds/lakes and foreshore, depending on the

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		<p>location of the site.</p> <ul style="list-style-type: none"> In larger scale residential developments within areas of "high" to "extreme" groundwater vulnerability, the hydrogeological assessment should be conservative and take into consideration the potential impact that the overall proposed development may have on groundwater and surface water. For clarity in determining the 6 per hectare density, only the areas within the immediate site boundaries of dwellings in close proximity to prospective sites shall be calculable. <p>12.10.2.2 Non-domestic wastewater treatment systems</p> <p>Consideration of non-domestic wastewater treatment systems in those areas not served by a public foul sewerage system will be subject to full compliance with EPA Wastewater Treatment Manuals ('Treatment Systems for Small Communities, Business, Leisure Centres and Hotels').</p> <p>In areas of high to extreme groundwater vulnerability (this includes areas in Rathmichael, Kiltiernan and Glencullen and may include other areas in the County), further hydrogeological assessment shall be undertaken by a competent and experienced hydrogeologist, which assessment should demonstrate to the satisfaction of Dún Laoghaire-Rathdown County Council that the proposed treatment system serving the proposed development will not have any detrimental effect on surface water or groundwater quality.</p> <ul style="list-style-type: none"> Should the proposed discharge be greater than 5m³/d, a discharge licence to groundwater will be required and a successful assimilative capacity assessment will have to be undertaken in line with the EPA (2011) "Guidance on the Authorisation of Discharges to Groundwater". The tier of assessment (i.e. 2 or 3) required will be dependent on the potential risk of impact and the proposed daily discharge. Should a discharge to surface water be considered or should surface water be considered as a receptor at risk, the assimilative capacity should follow the technical rules established in the "Guidance, Procedures and Training on the Licensing of Discharges to Surface Waters" (Water Services National Training Group, 2011)". <p>Information on Groundwater data mapping and Groundwater protection responses are available on the GSI website (https://www.gsi.ie) and Appendix E of the EPA Code of Practice Domestic Wastewater Treatment Systems (Population Equivalent ≤ 10) (March 2021) and should be used as a resource tool.</p> <p>Wastewater treatment systems shall be located entirely within the site boundary.</p> <p>The Council will liaise with Irish Water to ensure compliance with existing licenses, the Urban Waste water Directive and the EU Habitats Directive.</p> <p>SLO 130 To ensure that development within this objective area does not (i) have a significant negative impact on the environmental sensitivities in the area including those identified in the SEA Environmental Report, and/or (ii) does not significantly detract from the character of the area either visually or by generating traffic volumes which would necessitate road widening or other significant improvements.</p> <p>Policy Objective E111: Resource Management</p> <p>It is a Policy Objective to implement the Eastern-Midlands Region Waste Management Plan 2015-2021 and subsequent plans, in supporting the transition from a waste management economy towards a circular economy, to enhance employment and increase the value recovery and recirculation of resources. Underpinning this objective is the requirement to conform to the European Union and National Waste Management Hierarchy of the most favoured options for waste as illustrated below subject to economic and technical feasibility and Environmental Assessment. (Consistent with RPO 10.25 of the RSES)</p> <p>Policy Objective E112: Waste Management Infrastructure, Prevention, Reduction, Reuse and Recycling (Circular Economy approach)</p> <p>It is a Policy Objective:</p> <ul style="list-style-type: none"> To support the principles of the circular economy, good waste management and the implementation of best international practice in relation to waste management in order for the County and the Region to become self-sufficient in terms of resource and waste management and to provide a waste management infrastructure that supports this objective. To aim to provide a supporting waste management infrastructure in the County for the processing and recovery of waste streams such as mixed municipal waste in accordance with the proximity principle. To provide for civic amenity facilities and bring centres as part of an integrated waste collection system in accessible locations throughout the County and promote the importance of kerbside source segregated collection of household and commercial waste as the best method to ensure the quality of waste presented for recycling is preserved. To ensure any waste amenity facilities adhere to the Waste Regional Offices Waste Management Infrastructure siting guidelines. To develop a County wide network of multi material recycling centres, bring centres and a reuse centre and to require the provision of adequately-sized recycling facilities in new commercial and large-scale residential developments, where appropriate. To promote the inclusion of such centres in all large retail developments to maximise access by the public. To ensure new developments are designed and constructed in line with the Council's Guidelines for Waste Storage Facilities (an excerpt of which is contained in Appendix 6). <p>Policy Objective E113: Hazardous Waste</p> <p>It is a Policy Objective to adhere to the recommendations of the 'National Hazardous Waste Management Plan 2014-2020' and any subsequent plan, and to co-operate with other agencies, to plan, organise, authorise and supervise the disposal of hazardous waste streams, including hazardous waste identified during construction and demolition projects.</p> <p>Construction Management Plan requirements under Plan Sections 12.9.4 to 12.9.6</p> <p>Various provisions under Chapter 6: Enterprise and Employment, including</p> <p>Policy Objective E17: Maritime Economy</p> <p>It is a Policy Objective to support the sustainable development of the maritime economy.</p> <p>Policy Objective E18: Rural Development</p> <p>It is a Policy Objective to facilitate the development of acceptable rural enterprises and to minimise pollution from agricultural and industrial sources by means of development management and water pollution legislation.</p>

Topic	Potentially Significant Adverse Effect, if Unmitigated	Recommendations integrated into the Plan, included in:
Cultural Heritage	<ul style="list-style-type: none"> Potential effects on protected and unknown archaeology and protected architecture arising from construction and operation activities. 	<p>Archaeological Heritage Policy Objective HER1: Protection of Archaeological Heritage It is a Policy Objective to protect archaeological sites, National Monuments (and their settings), which have been identified in the Record of Monuments and Places and, where feasible, appropriate and applicable to promote access to and signposting of such sites and monuments.</p> <p>Policy Objective HER2: Protection of Archaeological Material in Situ It is a Policy Objective to seek the preservation in situ (or where this is not possible or appropriate, as a minimum, preservation by record) of all archaeological monuments included in the Record of Monuments and Places, and of previously unknown sites, features and objects of archaeological interest that become revealed through development activity. In respect of decision making on development proposals affecting sites listed in the Record of Monuments and Places, the Council will have regard to the advice and/ or recommendations of the Department of Culture, Heritage and the Gaeltacht (DCHG).</p> <p>Policy Objective HER3: Protection of Historic Towns It is a Policy Objective to promote and protect the Historic Town of Dalkey as identified by the Department of Culture, Heritage and the Gaeltacht (DCHG) (consistent with RPO 9.27 of the RSES).</p> <p>Policy Objective HER4: Carrickmines Castle Site It is a Policy Objective to support the implementation of the (Archaeological) Conservation Plan for the Carrickmines Castle Site.</p> <p>Policy Objective HER5: Historic Burial Grounds It is a Policy Objective to protect historical and/or closed burial grounds within the County and encourage their maintenance in accordance with good conservation practice and to promote access to such sites where possible.</p> <p>Policy Objective HER6: Underwater Archaeology It is a Policy Objective for all developments, which have potential to impact on riverine, intertidal and sub-tidal environments to require an archaeological assessment prior to works being carried out.</p> <p>Architectural Heritage Policy Objective HER7: Record of Protected Structures It is a Policy Objective to include those structures that are considered in the opinion of the Planning Authority to be of special architectural, historical, archaeological, artistic, cultural, scientific, technical or social interest in the Record of Protected Structures.</p> <p>Policy Objective HER8: Work to Protected Structures It is a Policy Objective to:</p> <ol style="list-style-type: none"> Protect structures included on the RPS from any works that would negatively impact their special character and appearance; Ensure that any development proposals to Protected Structures, their curtilage and setting shall have regard to the 'Architectural Heritage Protection Guidelines for Planning Authorities' published by the Department of the Arts, Heritage and the Gaeltacht; Ensure that all works are carried out under supervision of a qualified professional with specialised conservation expertise; Ensure that any development, modification, alteration, or extension affecting a Protected Structure and/or its setting is sensitively sited and designed, and is appropriate in terms of the proposed scale, mass, height, density, layout, and materials; Ensure that the form and structural integrity of the Protected Structure is retained in any redevelopment and that the relationship between the Protected Structure and any complex of adjoining buildings, designed landscape features, or views and vistas from within the grounds of the structure are respected; Respect the special interest of the interior, including its plan form, hierarchy of spaces, architectural detail, fixtures and fittings and materials; Ensure that new and adapted uses are compatible with the character and special interest of the Protected Structure; Protect the curtilage of protected structures and to refuse planning permission for inappropriate development within the curtilage and attendant grounds that would adversely impact on the special character of the Protected Structure; Protect and retain important elements of built heritage including historic gardens, stone walls, entrance gates and piers and any other associated curtilage features; Ensure historic landscapes and gardens associated with Protected Structures are protected from inappropriate development (consistent with NPO 17 of the NPF and RPO 9.30 of the RSES). <p>Policy Objective HER9: Protected Structures Applications and Documentation It is a Policy Objective to require all planning applications relating to Protected Structures to contain the appropriate level of documentation in accordance with Article 23 (2) of the Planning Regulations and Chapter 6 and Appendix B of the 'Architectural Heritage Protection Guidelines for Planning Authorities', or any variation thereof.</p> <p>Policy Objective HER10: Protected Structures and Building Regulations It is a Policy Objective to protect the character and special interest of Protected Structures when considering or carrying out interventions to comply with the requirements of the Building Regulations - with particular reference to Part B and Part M.</p> <p>Policy Objective HER11: Energy Efficiency of Protected Structures It is a Policy Objective to have regard to the Department of Environment, Heritage and Local Government's publication on 'Energy Efficiency in Traditional Buildings' (2010) and the Irish Standard IS EN 16883:2017 'Conservation of cultural heritage - guidelines for improving the energy performance of historic buildings' (2017) and any future advisory documents in assessing proposed works on Protected Structures.</p> <p>Policy Objective HER12: National Inventory of Architectural Heritage (NIAH) It is a Policy Objective to review and update the RPS on foot of any Ministerial recommendations. The 'Ministerial Recommendations', made under Section 53 of the Planning Acts, will be taken into account when the Planning Authority is considering proposals for development that would affect the historic or architectural interest of these structures.</p>

Topic	Potentially Significant Adverse Effect, if Unmitigated	Recommendations integrated into the Plan, included in:
		<p>Policy Objective HER13: Architectural Conservation Areas It is a Policy Objective to:</p> <ul style="list-style-type: none"> i. Protect the character and special interest of an area which has been designated as an ACA. Please refer to Appendix 4 for a full list of ACAs. ii. Ensure that all development proposals within an ACA be appropriate to the character of the area having regard to the Character Appraisals for each area. iii. Ensure that any new development or alteration of a building within an ACA or immediately adjoining an ACA is appropriate in terms of the proposed design, including scale, height, mass, density, building lines and materials. iv. Seek a high quality, sensitive design for any new development(s) that are complimentary and/or sympathetic to their context and scale whilst simultaneously encouraging contemporary design which is in harmony with the area. Direction can also be taken from using traditional forms that are then expressed in a contemporary manner rather than a replica of a historic building style. v. Ensure street furniture is kept to a minimum, is of good design and any redundant street furniture removed. vi. Seek the retention of all features that contribute to the character of an ACA including boundary walls, railings, soft landscaping, traditional paving and street furniture. <p>Policy Objective HER14: Demolition within an ACA It is a Policy Objective to prohibit the demolition of a structure(s) that positively contributes to the character of the ACA.</p> <p>Policy Objective HER15: Shopfronts within an ACA It is a Policy Objective to:</p> <ul style="list-style-type: none"> i. Ensure that all original and traditional shopfronts which contribute positively to the appearance and character of a streetscape within an ACA are retained and restored. ii. Ensure that new shopfronts are well-designed, through the sympathetic use of scale, proportion and materials (Refer also to Chapter 12, Section 12.6.8). <p>Policy Objective HER16: Public Realm and Public Utility works within an ACA It is a Policy Objective to:</p> <ul style="list-style-type: none"> i. Retain or sensitively reintegrate any surviving items of historic street furniture and finishes such as granite kerbing and paving that contribute to the character of an ACA. ii. Ensure that works to the public realm - such as the provision of traffic control measures, street furniture, materials and finishes - have regard to the distinctive character of the area. iii. Encourage the undergrounding of over-head services and the removal of redundant wiring/cables within an ACA. <p>Policy Objective HER17: Candidate Architectural Conservation Areas It is a Policy Objective to assess candidate Architectural Conservation Areas to determine if they meet the requirements and criteria for re-designation as Architectural Conservation Areas.</p> <p>Policy Objective HER18: Development within a Candidate Architectural Conservation Area It is a Policy Objective that development proposals within a candidate Architectural Conservation Area will be assessed having regard to the impact on the character of the area in which it is to be placed.</p> <p>Policy Objective HER19: Protection of Buildings in Council Ownership It is a Policy Objective to:</p> <ul style="list-style-type: none"> i. Continue to demonstrate best practice with regard to Protected Structures, Recorded Monuments and other elements of architectural heritage in its ownership and care. ii. Ensure any works are undertaken having regard to the Department of Culture, Heritage and the Gaeltacht 'Advice Series' publications on how best to carry out repairs and maintain historic buildings and ensure the use of specialist practitioners in the field of conservation. <p>Policy Objective HER20: Buildings of Vernacular and Heritage Interest It is a Policy Objective to:</p> <ul style="list-style-type: none"> i. Retain, where appropriate, and encourage the rehabilitation and suitable reuse of existing older buildings/structures/features which make a positive contribution to the character and appearance of the area and streetscape in preference to their demolition and redevelopment and to preserve surviving shop and pub fronts of special historical or architectural interest including signage and associated features. ii. Encourage the retention and/or reinstatement of original fabric of our historic building stock such as windows, doors, roof coverings, shopfronts, pub fronts and other significant features. iii. Ensure that appropriate materials be used to carry out any repairs to the historic fabric. <p>Policy Objective HER21: Nineteenth and Twentieth Century Buildings, Estates and Features: It is a Policy Objective to:</p> <ul style="list-style-type: none"> i. Encourage the appropriate development of exemplar nineteenth and twentieth century buildings, and estates to ensure their character is not compromised. ii. Encourage the retention and reinstatement of features that contribute to the character of exemplar nineteenth and twentieth century buildings, and estates such as roofscapes, boundary treatments and other features considered worthy of retention. iii. Ensure the design of developments on lands located immediately adjacent to such groupings of buildings addresses the visual impact on any established setting. <p>Policy Objective HER22: Protection of Historic Street Furniture and Public Realm It is a Policy Objective to:</p> <ul style="list-style-type: none"> i. Preserve the retention of historic items of street furniture where these contribute to the character of the area including items of a vernacular or local significance. ii. Promote high standards for design, materials and workmanship in public realm improvements within areas of historic character. <p>Policy Objective HER23: Industrial Heritage It is a Policy Objective to:</p> <ul style="list-style-type: none"> i. Have regard to those items identified in the Industrial Heritage Survey listed in Appendix 4 when assessing any development proposals. ii. Identify further sites of industrial heritage significance with a view to assessing them for inclusion in the Record of Protected Structures.

Topic	Potentially Significant Adverse Effect, if Unmitigated	Recommendations integrated into the Plan, included in:
		<p>Policy Objective HER24: Protection of Coastline Heritage It is a Policy Objective to:</p> <ol style="list-style-type: none"> Encourage and promote the retention of features of the County's coastal heritage where these contribute to the character of the area. Have regard to those items identified in the Coastal Architecture Heritage Survey when assessing any development proposals. <p>Policy Objective HER25: Heritage Plan It is a Policy Objective to support the preparation and implementation of the third DLR County Heritage Plan 2021 – 2025.</p> <p>Policy Objective HER26: Historic Demesnes and Gardens It is a Policy Objective that historic demesnes and gardens should be identified and protected to reflect and acknowledge their significance as part of our National Heritage. The following houses and gardens are listed: Cabinteely House, Marlay House, Fernhill and Old Conna.</p> <p>Policy Objective HER27: Civic Memorials It is a Policy Objective that the Council will, at appropriate times and having due regard to resources and suitable subject matter, erect civic memorials in accordance with Part 1 of the Council's Memorials Policy adopted in 2011 in order to raise awareness of the County's history and heritage.</p> <p>Policy Objective HER28: The Metals It is a Policy Objective to manage and enhance The Metals from the Peoples Park to Dalkey giving due regard to its historic importance while continuing to facilitate and encourage its use as a walking and cycling route between Dún Laoghaire and Dalkey.</p> <p>Requirements under Chapter 12: Development Management, including those under the headings of:</p> <ul style="list-style-type: none"> Heritage Archaeological Heritage Architectural Heritage - Protected Structures Architectural Conservation Areas (ACAs) New Development within an ACA
Landscape	<ul style="list-style-type: none"> Occurrence of adverse visual impacts and conflicts with the appropriate protection of designations relating to the landscape. 	<p>Landscape</p> <p>Policy Objective GIB2: Landscape Character Areas It is a Policy Objective to continue to protect, manage and plan to conserve, maintain or enhance the distinctive characteristics of the County's landscapes, townscapes and seascapes in accordance with the recommended strategies as originally outlined in the Landscape Character Assessment (2002 and since updated), in accordance with the 'Draft Guidelines for Landscape and Landscape Assessment' (2000) as issued by the Department of Environment and Local Government, in accordance with the European Landscape Convention (Florence Convention) and in accordance with 'A National Landscape Strategy for Ireland – 2015-2025'. The Council shall implement any relevant recommendations contained in the Department of Arts, Heritage, and the Gaeltacht's National Landscape Strategy for Ireland, 2015 - 2025.</p> <p>Policy Objective GIB3: Seascape It is a Policy Objective to carry out a Local Seascape Assessment in accordance with any relevant recommendations or methodologies contained in the Irish Marine Institute's National Seascape Character Assessment and the Department of Culture, Heritage and the Gaeltacht's 'National Landscape Strategy for Ireland, 2015 – 2025'.</p> <p>Policy Objective GIB4: High Amenity Zones It is Policy Objective to conserve and enhance existing High Amenity Zones and to seek to manage these and other areas to absorb further recreational uses and activity without damaging their unique character.</p> <p>Policy Objective GIB5: Historic Landscape Character Areas In assessing development proposals and in the preparation of plans, it is a Policy Objective to have regard to the recommendations and findings of the Historic Landscape Character Assessments (HLCA), already undertaken for a number of the urban-rural fringe areas of the County most likely to come under development pressure.</p> <p>Policy Objective GIB6: Views and Prospects It is a Policy Objective to preserve, protect and encourage the enjoyment of views and prospects of special amenity value or special interests, and to prevent development, which would block or otherwise interfere with Views and/or Prospects.</p> <p>SLO 130 To ensure that development within this objective area does not (i) have a significant negative impact on the environmental sensitivities in the area including those identified in the SEA Environmental Report, and/or (ii) does not significantly detract from the character of the area either visually or by generating traffic volumes which would necessitate road widening or other significant improvements.</p> <p>SLO 151 To provide for a number of holiday caravan/camping facilities within a 1km radius of the cross roads at Glencullen subject to the following: ensuring that there is not an over proliferation of such facilities, ensuring any proposals do not undermine the overall zoning objective, ensuring proposals do not have a negative impact on the source protection area or sensitive watercourses as identified in the Glencullen Local Area Plan and/or in section 10.2.2.5 of this Plan and ensuring that the development (including any resultant increases in visitor numbers and/or behaviour) does not affect the integrity of the Knocksink Wood Special Area of Conservation. Each facility shall be limited to a total of 10 pitches (combination of pods, glamping, tents, camper vans) and any glamping pods shall be commensurate in size and scale to a tent/camper van so as to avoid any negative visual impact on the landscape.</p>

Table 2.2 identifies some of the key provisions/part of provisions that was integrated into the Plan as a direct result of SEA and AA recommendations.

Table 2.2 Selection of Recommendations from the SEA and AA processes

Chapter	Recommended Text Integrated into the Plan
2 Core Strategy	<p>Normal black text like this was already part of the emerging Draft Plan; Green text <i>like this</i> was proposed to be added to the Plan; Red strikethrough text like this was proposed to be deleted from the Plan</p> <p>Ecosystems Services Approach and Natural Capital Ecosystems are multifunctional communities of living organisms interacting with each other and their environment. Ecosystems provide a series of services for human well-being (ecosystem services) either directly or indirectly contributing towards human wellbeing. The Ecosystems Services Approach followed by the Plan provides a strategy for the integrated management of land, water and living resources that promotes conservation and sustainable use in an equitable way. Ecosystem Services Approach principles include:</p> <ul style="list-style-type: none"> a) Consideration of natural systems - by using knowledge of interactions in nature and how ecosystems function (this has been considered in preparing Chapters including no. 3, 8, 9 and 10) b) Taking into account of the services that ecosystems provide - including those that underpin social and economic well-being, such as flood and climate regulation (this has been considered in preparing Chapters including no. 3 and 8) or recreation, culture and quality of life (this has been considered in preparing Plan Chapters including no. 9 and 11) c) Involving people - those who benefit from the ecosystem services and those managing them need to be involved in decisions that affect them. Public consultation has informed the preparation of the Draft Plan which will be further refined before adoption, taking into account submissions/observations made on the Draft Plan during public display. <p>Natural capital consists of renewable and non-renewable resources (e.g. plants, animals, air, water, soils, minerals) which need to be managed. In recognition of this, policy objectives have been integrated into the Plan that will contribute towards the management of air quality, noise pollution, light pollution, pollination, flood risk, water bodies and river basins and natural resources supporting energy production and recreation.</p> <p>Policy Objective CS7 - Ecosystem Services Approach It is a policy objective to promote an Ecosystem Services Approach in the preparation of lower-level plans, strategies and Development Management.</p>
5 Transport and Mobility	<p>Policy Objective T25: Environmental Assessment of New Roads It is a Policy Objective that where projects for new roads, identified under Section 5.8, are not already provided for by existing plans/programme or are not already permitted, that the feasibility of progressing these projects shall be examined, taking into account environmental sensitivities as identified in the SEA Environmental Report (including greenhouse gas emissions and other emissions to air) and the objectives of the Plan relating to sustainable mobility. A Corridor and Route Selection Process will be undertaken where appropriate, for relevant new road infrastructure in two stages: Stage 1 – Route Corridor Identification, Evaluation and Selection and Stage 2 – Route Identification, Evaluation and Selection. In implementing this Objective, the Council will comply with any national policy or guidelines issued relating to the assessment of greenhouse gas emissions and other emissions to air for new transport projects.</p>
8 Green Infrastructure and Biodiversity	<ul style="list-style-type: none"> • Caveats added under Policy Objective GIB24 “Rivers and Waterways” to improve flexibility with regard to sustainable development • Reference to “Natura 2000 sites” changed to “European sites” throughout the document <p>8.7.1.2 Policy Objective GIB19: Habitats Directive It is a Policy Objective to ensure the protection of natural heritage and biodiversity, including European sites that form part of the Natura 2000 network, in accordance with relevant EU Environmental Directives and applicable National Legislation, Policies, Plans and Guidelines. Implementation of the above policy will be in accordance with the following and any updated/ superseding documents:</p> <ul style="list-style-type: none"> • EU Directives, including the Habitats Directive (92/43/EEC), as amended, the Birds Directive (2009/147/EC), the Environmental Liability Directive (2004/35/EC), the Environmental Impact Assessment Directive (85/337/EEC 2011/92/EU, as amended by 2014/52/EC), as amended, the Water Framework Directive (2000/60/EC) and the Strategic Environmental Assessment Directive (2001/42/EC). • National legislation, including the Wildlife Acts 1976 and 2010, as amended, the European Communities (Environmental Impact Assessment) Regulations 1989 (SI No. 349 of 1989), as amended, European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018, the European Union (Water Policy) Regulations 2003, as amended, the Planning and Development Act, 2000, as amended, the European Communities (Birds and Natural Habitats) Regulations 2011 (SI No. 477 of 2011), as amended, the European Communities (Environmental Liability) Regulations 2008, as amended, and the Flora Protection Order 2015. • National policy guidelines, including the Landscape and Landscape Assessment Draft Guidelines 2000, the Environmental Impact Assessment Sub- Threshold Development Guidelines 2003, Strategic Environmental Assessment Guidelines 2004, Flood Risk Management Guidelines 2009, Guidelines on the Information to be contained in Environmental Impact Assessment Reports 2017, and the Appropriate Assessment Guidance 2010. • Catchment and Water Resource Management Plans, including the Eastern National River Basin District Management Plan 2018-2021. • Biodiversity Plans and guidelines, including the forthcoming DLR County Biodiversity Action Plan 2021-2025, the National Biodiversity Action Plan 2017-2021, and the EU Biodiversity Strategy 2030. • Ireland's Environment 2016 (EPA) and to make provision, where appropriate, to address the report's goals and challenges.
9 Open Space and Recreation	<p>Policy Objective OSR11: Water-Based Sports It is a Policy Objective to support and encourage water-based sports and maritime leisure activities along the coast subject to Council Bye-Laws and the Habitats and Birds Directives. The County features seventeen kilometres of coastline, which is a valuable asset. If utilised to its full potential it can contribute to the health and well-being of the residents of, and workers, in the County and will increase sport and physical activity participation levels locally. These activities can also offer significant potential for tourism growth.</p>

Chapter	Recommended Text Integrated into the Plan
	Normal black text like this was already part of the emerging Draft Plan; Green text like this was proposed to be added to the Plan; Red strikethrough text like this was proposed to be deleted from the Plan
	<p>Development Management requirement under Section 12.7.2 “Biodiversity” The Planning Authority may require, where appropriate, Visitor/Management Plans to be submitted as part of the Development Management process for development proposals within or adjacent to an ecological sensitive site, as appropriate. The Visitor/Management Plan shall include appropriate measures to avoid significant negative effects and loss of habitat and associated disturbance to the ecological sensitive site.</p>
10 Environmental Infrastructure	<ul style="list-style-type: none"> • Caveats added under Policy Objectives EI7, EI5 and Section 10.2.1.4 to ensure consistency with Habitats Directive and Water Framework Directive. <p>Policy Objective EI19: Overhead Cables It is a Policy Objective to seek the undergrounding of all electricity, telephone and television cables wherever possible, in the interests of visual amenity and public health. Overhead cables detract from visual amenity and therefore it is Council policy to seek the placing underground of cables. It is the intention of the Council to co-operate with other agencies as appropriate, and to use its development management powers in the implementation of this policy. Where undergrounding of cables is being pursued, proposals should demonstrate that environmental impacts including the following are minimised:</p> <ul style="list-style-type: none"> • Habitat loss as a result of removal of field boundaries and hedgerows (right of way preparation) followed by topsoil stripping (to ensure machinery does not destroy soil structure and drainage properties); • Short to medium term impacts on the landscape where, for example, hedgerows are encountered; • Impacts on underground archaeology; • Impacts on soil structure and drainage; and • Impacts on surface waters as a result of sedimentation.
12 Development Management	<p>Policy Objective CA9: Radon Gas It is a Policy Objective, in partnership with other relevant agencies, to promote best practice in the implementation of radon prevention measures</p>
13 Land Use Zoning Objectives	<p>13.1.1 Purpose of Use Zoning Objectives</p> <p>The purpose of land use zoning is to indicate the development management objectives of the Council for all lands in its administrative area. Nineteen such zones are indicated in this Plan. They are identified by letter and colour on the Development Plan Maps. The land use zones used and the various objectives for these areas are detailed in Tables Nos.13.1.1– 13.1.19. In addition to land use zones being indicated, the accompanying maps detail various other considerations including, but not limited to, environmental, heritage, and locational specific considerations. An objective is also outlined for the Cherrywood Strategic Development Zone.</p> <p>Table Nos. 13.1.1– 13.1.19 inclusive are intended as guidelines in assessing development proposals. However, they relate only to land use. Factors such as making the most efficient use of land, density, height, massing, tr generation, public health regulations, design criteria, visual amenity, environmental considerations, flooding and potential nuisance by way of noise, odour or air pollution are also of importance in establishing whether or n development proposal conforms to the proper planning and sustainable development of an area. General guidelines are set out in subsequent paragraphs of this part of the Written Statement and targeted policy objectives development management standards are detailed across Chapters 2-12 and 14.</p> <p>Table Nos. 13.1.1– 13.1.19. list the land use activities most commonly encountered in the County and each is defined in Section 13.2 at the end of this chapter. They are intended as a general guideline and the uses listed are not exhaustive. An applicant is advised to consult with the Planning Authority prior to submitting an application for development in order to ascertain any specific considerations relating to the subject site (see Chapter 12, Development Management, Section 12.1.1.1).</p>
Chapter Specific Objectives 14 Local	<p>SLO115 - To provide an open seawater pool as a part of the nextphase of the development at the Dún Laoghaire Baths site. This provision shall take into account environmental feasibility, including ecological, water and cultural heritage sensitivities. Any proposals shall be subject to Appropriate Assessment Screening in accordance with the requirements of the EU Habitats Directive and shall ensure the protection and preservation of all designated SACs, SPAs, and pNHA(s) in Dublin Bay and the surrounding area.</p> <p>SLO116 - To provide a cultural and heritage centre in the environs of the Dún Laoghaire Harbour that focusses on the unique history of emigration from the Carlisle Pier, the construction of the harbour, the role of the harbour in the development of amateur watersports and the celebration of the first suburban rail line and mail boat service. Any proposals shall be subject to Appropriate Assessment Screening in accordance with the requirements of the EU Habitats Directive and shall ensure the protection and preservation of all designated SACs, SPAs, and pNHA(s) in Dublin Bay and the surrounding area.</p> <p>SLO117 - The feasibility of incorporating the East Coast Cycle Trail into any coastal protection works required between Corbawn Lane and the proposed DART station at Woodbrook should be investigated. Such works shall be carried out in accordance with the recommendations of the Coastal Defence Strategy (2010) or any future Strategy. Any proposals shall be subject to Appropriate Assessment Screening in accordance with the requirements of the EU Habitats Directive and shall ensure the protection and preservation of all designated SACs, SPAs, and pNHA(s) in Dublin Bay and the surrounding area.</p>

Section 3 Environmental Report and Submissions/ Observations

3.1 Introduction

This section details how both the Environmental Report and submissions and observations made to Dún Laoghaire-Rathdown County Council on the Environmental Report and SEA process have been taken into account during the preparation of the Plan and the SEA.

3.2 SEA Scoping Notices and Submissions

As part of the scoping process for preparation of the Plan, environmental authorities³ were notified that a submission or observation in relation to the scope and level of detail of the information to be included in the Environmental Report could be made to the Council.

Two SEA scoping submissions were received, one from the Department of Culture, Heritage and the Gaeltacht and one from the Department of Agriculture, Food and the Marine. In addition, other issues relevant to the SEA, and associated AA process, were raised in submissions received as part of a separate consultation process on the pre-draft Issues Paper for the Plan. The issues raised in both sets of these submissions, as follow, informed the integration of environmental considerations into the Plan, including through the development of Plan provisions identified on Table 2.1 and Table 2.2 of this report:

- Archaeology
- Nature Conservation
- Integrated assessment
- Monitoring
- Coastal habitat conservation and coastal squeeze
- Green infrastructure and ecological network review
- Important bird habitats outside Special Protection Areas

³ The following authorities were notified: Department of Agriculture, Food and the Marine; Department of Culture, Heritage, and the Gaeltacht; Department of Housing, Planning and Local Government; Department of Communications, Climate Action and Environment; Environmental Protection Agency; Wicklow County Council; South Dublin County Council; and Dublin City Council.

- Access to natural heritage and greenways
- Knocksink Wood/Ballyman Glen
- Red Squirrel in the Dublin Mountains
- The Dublin Bay Biosphere Reserve
- Nitrogen deposition
- Sea-fisheries and the marine environment
- Relevant Legislation, Plans and Policies
- Potential Impacts on Sea-Fisheries and Aquaculture
- Sources of Marine Data
- Consultation
- Available Guidance & Resources
- Environmental Sensitivity Mapping Webtool
- SEA WebGIS Tool
- WFD Application
- AA GeoTool
- Transition to a low carbon climate resilient economy and society
- Environmental Authorities
- consideration of mineral resources and potential resources
- Geohazards
- Geothermal Suitability mapping
- National Aquifer mapping
- Geothermal Suitability mapping
- Wastewater Infrastructure
- Water Infrastructure
- Suggested Text for the draft CDP
- Obligations under the Habitats Directive and other environmental legislation

3.3 Submissions on the Draft Plan, Proposed Amendments and Associated Documents

Various submissions were made on the Draft Plan, Proposed Amendments and/or associated environmental assessment documents while these documents were on public display. Certain submissions resulted in updates being made to the Plan's provisions.

Updates to the SEA/AA documents made on foot of submissions include:

- To provide reference in the final, consolidated SEA Environmental Report (prepared following adoption of the Plan), to the EPA's new State of the Environment Report Ireland's Environment – An Assessment 2020.
- To replace the following text from the Section 10 "Monitoring Measures" from the SEA Environmental Report:

"A stand-alone Monitoring Report on the significant environmental effects of

implementing the Plan will be prepared in advance of the beginning of the review of the Plan. This report will seek to address the indicators set out on Table 10.1. The Council is responsible for the ongoing review of indicators and targets, collating existing relevant monitored data, the preparation of monitoring evaluation report(s), the publication of these reports and, if necessary, the carrying out of remedial action."

With:

"The Council shall, in conjunction with the Regional Assembly and other sources as relevant, implement the monitoring programme as set out on Table 10.1. This will include the preparation of stand-alone SEA Monitoring Reports:

1. To accompany the report required of the manager under Section 15(2) of the Act, including information in relation to progress on, and the results of, monitoring the significant environmental effects of implementation of the Plan, as required by Article 13J(2) of the Planning and Development Regulations 2001 (as amended);
 2. On the significant environmental effects of implementing the Plan, in advance of the beginning of the review of the next Plan."
- To update Appendix I to the SEA Environmental Report to ensure reference to the Biodiversity Strategy for 2030 - Bringing nature back into our lives (European Commission, 2020).
 - To incorporate new information on Infrastructure Assessment for the Plan into the SEA ER.
 - To include the following indicator as part of the Monitoring Programme: "Where monitoring reveals visitor or development pressure is causing negative effects on designated archaeological or architectural heritage, the Council will work with Regional Assembly, Fáilte Ireland and the National Monuments Service and other stakeholders, as relevant, to address pressures through additional mitigation."
 - To update the list of fifteen Monuments in State Care (twelve in State Ownership and three in State Guardianship) in the Plan area.

These submissions also informed the integration of environmental considerations into the Plan, including through the amendment/modification of Plan provisions identified on Table 2.1 and Table 2.2 of this report. The Chief Executive's Report on submissions received on the Draft Plan and

associated documents⁴ and the Chief Executive's Report on submissions received on the Proposed Material Alterations and associated documentation⁵ accompany this SEA Statement and the adopted Plan documents and provide exact detail on how submissions were taken into account.

3.4 SEA documents including SEA Environmental Report

The Draft Plan and accompanying documents (including SEA Environmental Report and AA and SFRA documents) were placed on public display, having integrated various recommendations arising from the SEA, AA and SFRA processes. Responses to submissions made during the period of public display of a Draft Plan were integrated into a Chief Executive's Report and considered by Dún Laoghaire-Rathdown County Council.

A number of material alterations were proposed after public display of the Draft Plan. The Proposed Material Alterations were subject to Screening for SEA and AA and a selection of Alterations were subject to SEA and Stage 2 AA.

On adoption of the Plan, the Environmental Report that had been placed on public display alongside the Draft Plan was updated to become a final Environmental Report that is consistent with the adopted Plan, taking into account all changes that were made to the original Draft Plan that was placed on public display.

⁴ "Chief Executive's Report on Draft Plan Consultation" (2020) available on the Council's website at

<https://www.dlrco.ie/en/county-development-plan/county-development-plan-2022-2028>

⁵ "Chief Executive's Report on Proposed Amendments to the Draft Plan Consultation" available on the Council's website at

<https://www.dlrco.ie/en/county-development-plan/county-development-plan-2022-2028>

Section 4 Summary of Alternatives considered

4.1 Introduction

The SEA Directive requires that reasonable alternatives (taking into account the objectives and the geographical scope of the plan or programme) are identified, described and evaluated for their likely significant effects on the environment.

Whether or not alternatives for the County Development Plan are available has been identified by Dún Laoghaire-Rathdown County Council.

4.2 Limitations in Available Alternatives

The Plan is required to be prepared by the Planning and Development Act 2000 (as amended), which specifies various types of objectives that must be provided for by the Plan. The alternatives available for the Plan are limited by the provisions of higher-level planning objectives, including those of the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Region. These documents set out various requirements for the content of the Plan including on topics such as land use zoning and the sustainable development of rural areas.

4.3 Type 1: Alternatives for an Ecosystem Services Approach to the Plan

Although many natural capital⁶ and ecosystem⁷ service issues have been taken into account over previous Plan periods, the importance of these in fulfilling environmental obligations has increasingly emerged. An Ecosystems Services Approach would provide a strategy for the integrated management of land, water and living resources that promotes conservation and sustainable use in an equitable way.

- Type 1 - Alternative A: A Plan that takes an Ecosystems Services Approach.
- Type 1 - Alternative B: A Plan that does not take an Ecosystems Services Approach

Alternative A would integrate a strategy throughout the Plan for the integrated management of land, water and living resources that promotes conservation and sustainable use in an equitable way.

Principles that would be integrated throughout the Plan, in a coordinated and comprehensive manner, would include:

- Consideration of natural systems - by using knowledge of interactions in nature and how ecosystems function
- Taking into account of the services that ecosystems provide - including those that underpin social and economic well-being, such as flood and climate regulation or recreation, culture and quality of life
- Involving people - those who benefit from the ecosystem services and those managing them need to be involved in decisions that affect them.

This would mean that there would be:

- An increased likelihood in the extent, magnitude and frequency of positive effects occurring with regard to natural capital⁸ and ecosystem service issues, such as the management of air quality, noise pollution, light pollution, pollination, flood risk, water bodies and river basins and natural resources supporting energy production and recreation; and
- A decreased likelihood in the extent, magnitude and frequency of adverse effects on natural capital and ecosystem services.

⁶ Renewable and non-renewable resources (e.g. plants, animals, air, water, soils, minerals)

⁷ Ecosystems are multifunctional communities of living organisms interacting with each other and their environment. Ecosystems provide a series of services for human well-being (ecosystem services) either directly or indirectly contributing towards human well-being

⁸ Renewable and non-renewable resources (e.g. plants, animals, air, water, soils, minerals)

Alternative B would not integrate a strategy throughout the Plan for the integrated management of land, water and living resources that promotes conservation and sustainable use in an equitable way.

As has been the case over previous plan periods, many natural capital and ecosystem service issues would be integrated into individual Plan Policy Objectives and into decision making at lower tiers of plan preparation and development management. However, this approach would be less coordinated and comprehensive than would be the case under an Ecosystems Services Approach.

This would mean that there would be:

- A decreased likelihood in the extent, magnitude and frequency of positive effects occurring with regard to natural capital and ecosystem service issues; and
- An increased likelihood in the extent, magnitude and frequency of adverse effects on natural capital and ecosystem services.

Selected Type 1 Alternative for the Plan: Alternative A, subject to review of the existing Green Infrastructure Strategy into which the Ecological Network which will be integrated and which will align with the DLR County Biodiversity Action Plan (see Plan Policy Objectives GIB1 and GIB23).

4.4 Type 2: Land Use Zoning

These types of alternatives consider the land use zoning of social, educational, health, religious, recreational and leisure, cultural and civic infrastructure (collectively referred to as neighbourhood infrastructure) to serve the local and wider community.

- Type 2 - Alternative A: Zone neighbourhood infrastructure as it currently is, along with residential uses, with Land Use Zoning Objective A ("To protect and/or improve residential amenity").
- Type 2 - Alternative B: Zone neighbourhood infrastructure with Land Use Zoning Objective SNI "To protect, improve and encourage the provision of sustainable neighbourhood infrastructure".

Alternative A would place the lands that provide this essential infrastructure at risk from coming under pressure for residential development. Such pressure could result in existing facilities / uses on site being lost or significantly downgraded to a degree that they would not adequately serve the expanding adjoining residential communities.

Because of this, opportunities would be lost for retaining community and other facilities within close proximity of the communities they serve and the result would be more unsustainable forms of development with increased travel times and a resultant need to travel by private car with associated transport generated emissions.

Alternative A would make living and working within and adjacent to the existing built-up footprint less desirable. As areas within and adjacent to the existing built-up footprint are generally more robust from an environmental perspective, better serviced and better connected, this alternative would hinder the County to sustainably accommodate new residents and maintain and improve services to existing and future communities in accordance with the NPF and RSES.

Alternative B would:

- Improve accessibility / permeability between new and existing residential communities and neighbourhood infrastructure, reducing travel times and the need to travel by private car with associated transport generated emissions; and
- Ensure that the existing and future, local and wider, communities are better served by this infrastructure in accordance with the NPF and RSES.

As a result, this alternative would make living and working within and adjacent to the existing built-up footprint more desirable – these areas are generally more robust from an environmental perspective, better serviced and better connected. In this way, this alternative would contribute towards environmental protection and sustainable development, enabling the County to sustainably accommodate new residents and maintain and improve services to existing and future communities.

Selected Type 2 Alternative for the Plan: Alternative B: Zone neighbourhood infrastructure with Land Use Zoning Objective SNI “To protect, improve and encourage the provision of sustainable neighbourhood infrastructure”.

4.5 Type 3: Alternatives for Additional Accommodation in Existing Built-up Areas

The “O/O Zone” in the 2016 Plan has an objective for “No increase in the number of buildings permissible”. This objective covers sensitive areas of Killiney and Dalkey proximate to the coast and much of this area is located close to the DART line, where higher densities would otherwise be permissible. The Office of the Planning Regulator requested for the “O/O Zone” contained in the existing 2016 Plan not to be included in the new Plan.

Three alternatives were considered under this type as follow:

- Type 3 - Alternative A: Include “O/O Zone”
- Type 3 - Alternative B: Do not include “O/O Zone”
- Type 3 - Alternative C: Include “O/O Zone” but reduce extent in comparison to the 2016 Plan’s coverage

By applying the “O/O Zone” (which has an objective for “No increase in the number of buildings permissible”) over the widest area, **Alternative A** would provide the greatest amount of protection of areas which are often sensitive from an amenity (including that contributed towards by architectural structures/areas, archaeological monuments/zones and views, which are already protected under other Plan objectives) and ecological perspective (including the protected Dalkey Coastal Zone and Killiney Hill pNHA).

However, this application of the “O/O Zone” in locations close to public transport, where government policy supports higher densities, would not contribute towards objectives for sustainable mobility, minimising greenhouse gas emissions from transport, efficiently using land, compact growth and optimising the use of existing infrastructure. Development that could be sustainably accommodated in the area covered by the “O/O Zone” under Alternative A would have the potential to be pushed out towards areas that are less well-serviced and less well-connected, resulting in unnecessary potentially significant adverse effects on all environmental components.

By not including the “O/O Zone”, **Alternative B** would provide the least amount of protection of areas which are often sensitive from an amenity (including that contributed towards by architectural structures/areas, archaeological monuments/zones and views, which are already protected under other Plan objectives) and ecological perspective (including the protected Dalkey Coastal Zone and Killiney Hill pNHA).

The removal of the “O/O Zone” in locations close to public transport, where government policy supports higher densities, would contribute towards objectives for sustainable mobility, minimising greenhouse gas emissions from transport, efficiently using land, compact growth and optimising the use of existing infrastructure. Development that could be sustainably accommodated in the area currently covered by the “O/O Zone” under the existing 2016 Plan would not be pushed out towards areas that are less well-serviced and less well-connected, avoiding unnecessary potentially significant adverse effects on all environmental components.

Alternative C involves including the “O/O Zone” but reducing its extent in comparison to the 2016 Plan’s coverage, a mixture of Alternative A and B that takes into account traffic, visual and ecological designation issues and provides the “O/O Zone” in some locations but not in others. The new objective for these areas would allow for sensitive infill in locations which are within 10 minutes’ walk of a DART station and which would not detract from the unique character of the area visually or by traffic generation which would necessitate changes to the road network.

Selected Type 3 Alternative for the Plan: Alternative C: Include “O/O Zone” but reduce extent in comparison to the 2016 Plan’s coverage.

4.6 Type 4: Densities

Alternatives identified relating to densities comprise:

- Type 4 - Alternative A: Application of a single standard density across the whole County in order to calculate the potential residential yield relating to land zoned for residential purposes for the Core Strategy.
- Type 4 - Alternative B: Application of different densities at different locations, as appropriate; higher densities where sustainable transport mode opportunities are available and lower densities where constraints are presented by, for example, cultural heritage designations or the local road network.

Alternative A could lead to the potential over or undersupply of land for primarily residential purposes.

The application of a singular low net residential density across the County could fundamentally undermine both national and regional strategic outcomes including the efficient use of land, compact growth and the transition towards a low carbon and more climate resilient society. This would have the potential to push new development towards more environmentally sensitive lands outside of the County that are less well-served and less well-connected, resulting in unnecessary potentially significant adverse effects on all environmental components.

The application of a singular high net residential density could result in a potential mis-alignment between the supply of zoned land to meet the projected demand for new housing. This could result in a misalignment between new development and essential services provision with associated potential for adverse effects on environmental components.

Alternative B would provide for the most sustainable Core Strategy, which would contribute towards environmental protection and management the most.

Higher densities would be provided where sustainable transport mode opportunities are available and lower densities would be provided where constraints are presented by, for example, cultural heritage designations or the local road network. This approach would contribute towards national and regional strategic outcomes including the efficient use of land, compact growth and the transition towards a low carbon and more climate resilient society.

Alternative B would help to ensure compact, sustainable development within and adjacent to the existing built-up footprint and would conflict with the protection and management of environmental components the least. Alignment between new development and essential services provision would be most likely under Alternative B.

Selected Type 4 Alternative for the Plan: Alternative B: Application of different densities at different locations, as appropriate.

4.7 Type 5: Strategic Land Reserve for Old Connaught

In light of the population allocation approved by the Eastern Midland Regional Assembly to enable the planned growth of the Key Town of Bray to 2031 (falling outside the timeframe of the 2022-2028 Plan), and the regional designation of Old Connaught as a strategic residential development area to facilitate the westward expansion of Bray, it is considered appropriate to identify a Strategic Land Reserve (SLR) to meet this designated future growth. The SLR does not comprise a residential zoning status or any future zoning status however it does protect an area from ad hoc and inappropriate development and provide a framework for potential future growth beyond the timeframe of the Plan period of 2028.

Alternatives identified relating to the SLR, as identified and considered in the Draft Background Paper for the SLR for Old Connaught, comprise:

- Type 5 - SLR 1 Alternative A: Old Connaught North (see Figure 4.1)
- Type 5 - SLR 2 Alternative B: Old Connaught North West (see Figure 4.2)
- Type 5 - SLR 3 Alternative C: Old Connaught South West (see Figure 4.2)

Alternative A: SLR 1 Old Connaught North

The SLR 1 lands are considered to be strategically located to benefit from planned strategic infrastructure upgrades in the area. The location of the lands immediately adjacent to and within walking distance of planned high frequency transport including the Green Line Luas extension, a Core Bus Corridor and the DART, would support the potential of the lands to comprise a sustainable urban extension of the Old Connaught area with access, through sustainable means, to strategic employment locations, local services and amenities. Constraints relating to the SLR 1 lands include the loss of existing agricultural and forestry land, impacts on identified protected views, proximity to a protected structure and potential noise pollution associated with the M11. While the lands would comprise 'greenfield' expansion of the built-up area as opposed to brownfield/infill compact growth it is considered that, subject to planned infrastructure upgrades, the SLR 1 lands would comprise a sustainable extension to the Old Connaught area.

Alternative B: SLR 2 Old Connaught North West

The SLR 2 lands are considered to be well located to benefit from planned strategic infrastructure upgrades in the area. The location of the lands in proximity to the planned Green Line Luas extension would support the potential of the lands to comprise a sustainable urban extension of the Old Connaught area with access, through sustainable means, to strategic employment locations, local services and amenities. Constraints relating to the SLR 2 lands include the loss of an active sporting facility serving the local and wider community and impacts on identified protected views. While the lands would not be considered to comprise compact growth it is considered that, in the context of planned infrastructure upgrades, the SLR 2 lands could, in part, comprise a sustainable extension to the Old Connaught area.

Alternative C: SLR 3 Old Connaught South West

The SLR 3 lands are considered to be well located to benefit from planned strategic infrastructure upgrades in the area. The lands do however have a number of constraints including: the comparative distance of part of the lands from planned high frequency transport and resultant connectivity to requisite amenities, services and employment locations; loss of existing agricultural lands; proximity to the Ballyman Glen, a Special Area of Conservation; impact on views identified for preservation; existing utility infrastructure locating at the lands; and, archaeology.

Selected Type 5 Alternative for the Plan: Alternative A: SLR 1 Old Connaught North. Having appraised each of the potential sites and undertaken a comparative analysis, SLR 1 (Alternative A) emerges as the most preferable on a number of fronts, and in particular those criteria identified in the NPF and RSES, and it is therefore recommended that SLR 1 is advanced as a potential strategic land reserve for inclusion in the Plan. The rationale for this recommendation is expanded upon further in the main SEA Environmental Report.

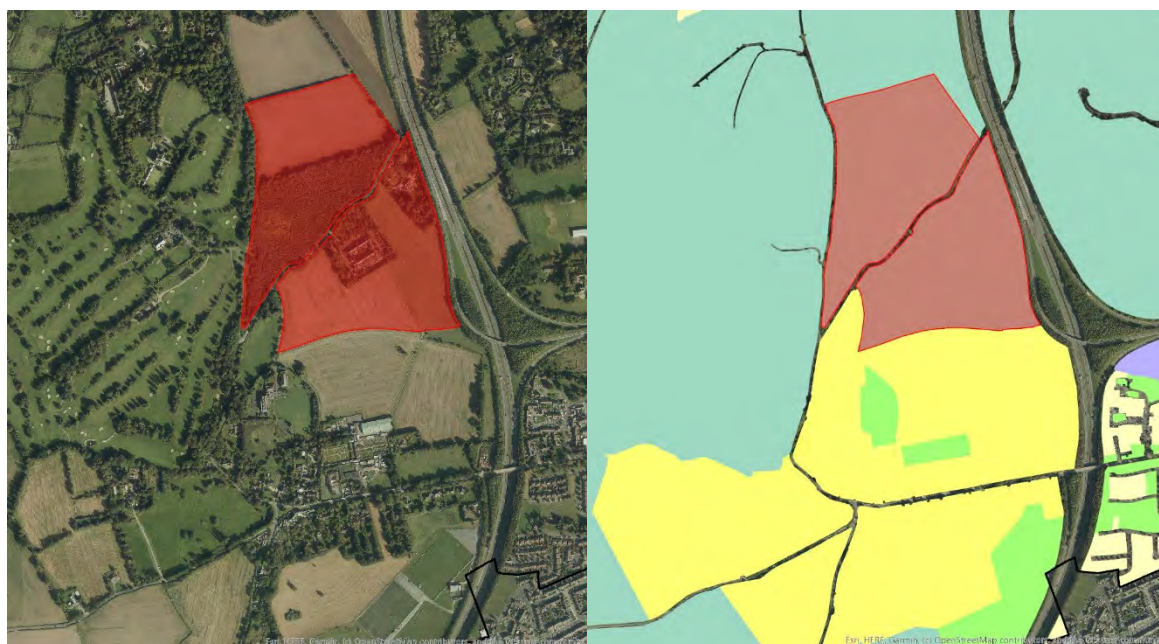


Figure 4.1 Type 5, Alternative A: SLR 1 Old Connaught North

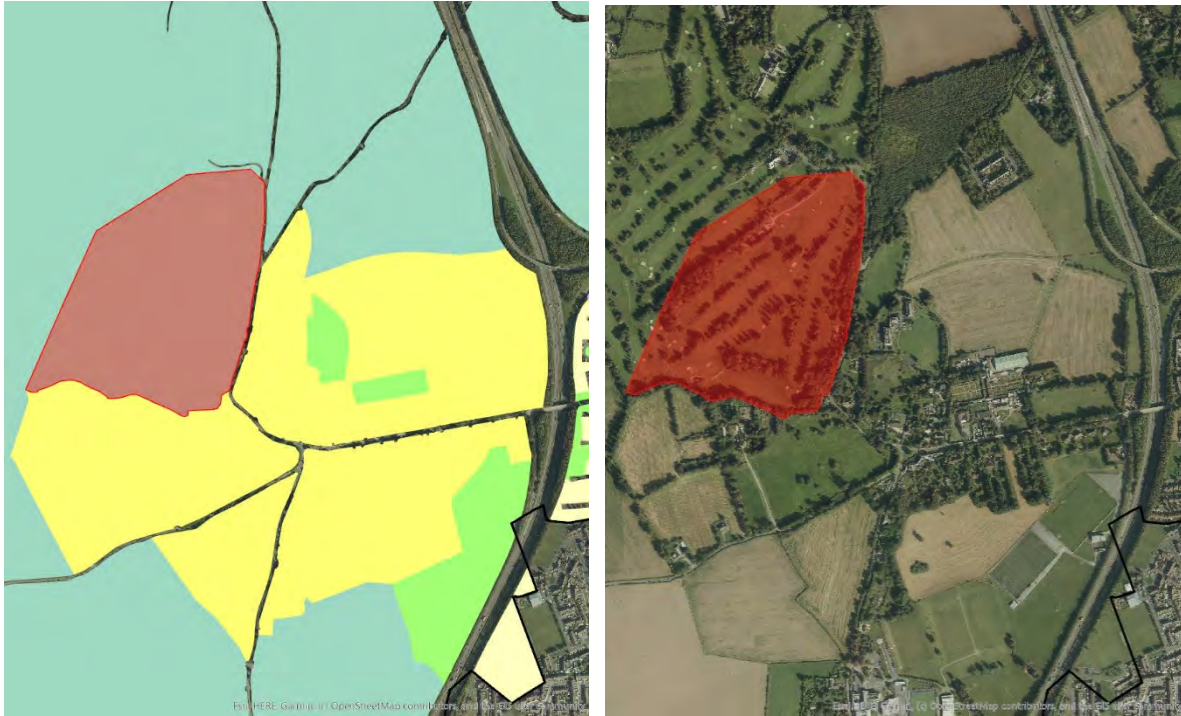


Figure 4.2 Type 5, Alternative B: SLR 2 Old Connaught North West

4.8 Reasons for Choosing the Selected Alternatives in light of Other Reasonable Alternatives Considered

Selected alternatives for the Plan from each of the tiers of alternatives that emerged from the planning/SEA process are indicated above.

These alternatives have been incorporated into the Plan having regard to both:

1. The environmental effects which are identified by the SEA and are detailed above; and
2. Planning - including social and economic - effects that also were considered by the Council.

Section 5 Monitoring Measures

5.1 Introduction

The SEA Directive requires that the significant environmental effects of the implementation of plans and programmes are monitored. This section details the measures which will be used in order to monitor the likely significant effects of implementing the Plan. It has been guided by the EPA guidance on this issue, “Guidance on SEA Statements and Monitoring” (2020).

Monitoring can both demonstrate the positive effects facilitated by the Plan and can enable, at an early stage, the identification of unforeseen adverse effects and the undertaking of appropriate remedial action.

The occurrence of significant adverse environmental effects not predicted and mitigated by this assessment, which are directly attributable to the implementation of the Plan, would necessitate consideration of these effects in the context of the Plan and potential remediation action(s) and/or review of part(s) of the Plan.

5.2 Indicators and Targets

Monitoring is based around indicators which allow quantitative measures of trends and progress over time relating to the Strategic Environmental Objectives identified in the main SEA Environmental Report and used in the evaluation. Each indicator to be monitored is accompanied by the target(s) which were identified with regard to the relevant strategic actions. Given the position of the Development Plan in the land use planning hierarchy beneath the Eastern and Midland Regional Spatial and Economic Strategy (RSES), the measures identified in that RSES SEA have been used – as they are, or having been slightly modified – in most instances. This consistency across the hierarchy of land use plans will improve the efficiency and effectiveness of future monitoring programmes.

Table 5.1 overleaf shows the indicators and targets which have been selected for monitoring the likely significant environmental

effects of implementing the Plan, if unmitigated.

Monitoring is an ongoing process and the programme allows for flexibility and the further refinement of indicators and targets. The Monitoring Programme may be updated to deal with specific environmental issues – including unforeseen effects – as they arise

5.3 Sources

The Plan will form part of the wider land use planning framework comprising a hierarchy of policies, plans, programmes, etc. This wider framework, including the National Planning Framework and the Eastern and Midland RSES, is subject to its own SEA (and associated monitoring) requirements. At lower tiers of the hierarchy, Local Area Plans and individual projects will be subject to their own monitoring requirements as relevant.

In implementing the Monitoring Programme the Council will take into account this hierarchy of planning and environmental monitoring.

Sources for indicators may include existing monitoring databases (including those maintained by planning authorities and national/regional government departments and agencies) and the output of lower-tier environmental assessment and decision making (including a review of project approvals granted and associated documents and the output of any EIA monitoring programmes).

5.4 Reporting and Responsibility

The Council shall, in conjunction with the Regional Assembly and other sources as relevant, implement the monitoring programme as set out on Table 5.1. This will include the preparation of stand-alone SEA Monitoring Reports:

1. To accompany the report required of the manager under Section 15(2) of the Act, including information in relation to progress

- on, and the results of, monitoring the significant environmental effects of implementation of the Plan, as required by Article 13J(2) of the Planning and Development Regulations 2001 (as amended); and
2. On the significant environmental effects of implementing the Plan, in advance of the beginning of the review of the next Plan.

IME1 "SEA Monitoring" provides that: "It is a Policy Objective to monitor the significant environmental effects of the implementation of the County Development Plan through the monitoring measures and reporting requirements set out in Section 10 of the SEA Environmental Report for the County Development Plan."

Table 5.1 Indicators, Targets, Sources and Remedial Action

Environmental Component	SEO Code	Indicators	Targets	Sources	Remedial Action
Biodiversity, Flora and Fauna	BFF	<ul style="list-style-type: none"> Condition of European sites 	<ul style="list-style-type: none"> Require all local level land use plans to include ecosystem services and green/blue infrastructure provisions in their land use plans and as a minimum, to have regard to the required targets in relation to the conservation of European sites, other nature conservation sites, ecological networks, and protected species Complete the review of the Dún Laoghaire-Rathdown Biodiversity Plan 2009-2013 and implement the revised Plan 	<ul style="list-style-type: none"> Department of Housing, Local Government and Heritage report of the implementation of the measures contained in the Habitats Directive - as required by Article 17 of the Directive (every 6 years). Department of Housing, Local Government and Heritage's National Birds Directive Monitoring Report for the under Article 12 (every 3 years) Consultations with the NPWS 	<ul style="list-style-type: none"> Where condition of European sites is found to be deteriorating this will be investigated with the Regional Assembly and the DHLGH to establish if the pressures are related to Plan actions / activities. A tailored response will be developed in consultation with these stakeholders in such a circumstance.
		<ul style="list-style-type: none"> Number of spatial plans that have included ecosystem services content, mapping and policy to protect ecosystem services when their relevant plans are either revised or drafted 	<ul style="list-style-type: none"> Require all local level land use plans to include ecosystem services and green/blue infrastructure provisions in their land use plans and as a minimum, to have regard to the required targets in relation to the conservation of European sites, other nature conservation sites, ecological networks, and protected species Complete the review of the Dún Laoghaire-Rathdown Biodiversity Plan 2009-2013 and implement the revised Plan 	<ul style="list-style-type: none"> Internal review of local land use plans 	<ul style="list-style-type: none"> Review internal systems
		<ul style="list-style-type: none"> SEAs and AAs as relevant for new Council policies, plans, programmes etc. 	<ul style="list-style-type: none"> Screen for and undertake SEA and AA as relevant for new Council policies, plans, programmes etc. 	<ul style="list-style-type: none"> Internal monitoring of preparation of local land use plans 	<ul style="list-style-type: none"> Review internal systems
		<ul style="list-style-type: none"> Status of water quality in the County's water bodies 	<ul style="list-style-type: none"> Included under Water below 	<ul style="list-style-type: none"> Included under Water below 	<ul style="list-style-type: none"> Included under Water below
		<ul style="list-style-type: none"> Compliance of planning permissions with Plan measures providing for the protection of Biodiversity and flora and fauna – see Chapter 8 “Green Infrastructure and Biodiversity” 	<ul style="list-style-type: none"> For planning permission to be only granted when applications demonstrate that they comply with all Plan measures providing for the protection of biodiversity and flora and fauna – see Chapter 8 “Green Infrastructure and Biodiversity” 	<ul style="list-style-type: none"> Internal monitoring of likely significant environmental effects of grants of permission 	<ul style="list-style-type: none"> Review internal systems
Population and Human Health	PHH	<ul style="list-style-type: none"> Implementation of Plan measures relating to the promotion of economic growth as provided for by Chapter 6 “Enterprise and Employment Strategy” 	<ul style="list-style-type: none"> For review of progress on implementing Plan objectives to demonstrate successful implementation of measures relating to the promotion of economic growth as provided for by Chapter 6 “Enterprise and Employment Strategy” By 2020 all citizens will have access to speeds of 30Mbps, and that 50% of citizens will be subscribing to speeds of 100Mbps (Also relevant to Material Assets) 	<ul style="list-style-type: none"> Internal review of progress on implementing Plan objectives Consultations with Department of Environment, Climate and Communications 	<ul style="list-style-type: none"> Review internal systems Consultations with Department of Environment, Climate and Communications

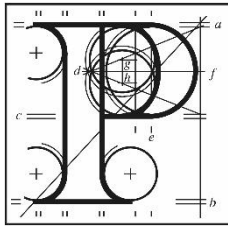
Environmental Component	SEO Code	Indicators	Targets	Sources	Remedial Action
		<ul style="list-style-type: none"> Number of spatial concentrations of health problems arising from environmental factors resulting from development permitted under the Plan 	<ul style="list-style-type: none"> No spatial concentrations of health problems arising from environmental factors as a result of implementing the Plan 	<ul style="list-style-type: none"> Consultations with the Health Service Executive and EPA 	<ul style="list-style-type: none"> Consultations with the Health Service Executive and EPA
		<ul style="list-style-type: none"> Proportion of people reporting regular cycling / walking to school and work above 2016 CSO figures 	<ul style="list-style-type: none"> Increase in the proportion of people reporting regular cycling / walking to school and work above 2016 CSO figures 	<ul style="list-style-type: none"> CSO data Monitoring of the Dún Laoghaire Rathdown County Council's Climate Change Action Plan 2019-2024 	<ul style="list-style-type: none"> Where proportion of population shows increase in private car use above CSO 2016 figures, the Council will coordinate with the Regional Assembly, the DHLGH, DECC and NTA to develop a tailored response.
		<ul style="list-style-type: none"> Number of spatial plans that include specific green infrastructure mapping 	<ul style="list-style-type: none"> Require all local level land use plans to include specific green infrastructure mapping 	<ul style="list-style-type: none"> Internal review of local land use plans 	<ul style="list-style-type: none"> Review internal systems
Soil (and Land)	S	<ul style="list-style-type: none"> Proportion of population growth occurring on infill and brownfield lands compared to greenfield (also relevant to Material Assets) 	<ul style="list-style-type: none"> Maintain built surface cover nationally to below the EU average of 4% as per the NPF Achieve the 50% target for all new homes within and adjacent to the existing built-up footprint of Dún Laoghaire-Rathdown To map brownfield and infill land parcels across the County. 	<ul style="list-style-type: none"> Environmental Protection Agency (EPA), Geoportal Compilation of greenfield and brownfield development for the Department of Housing, Local Government and Heritage AA/Screening for AA for each application 	<ul style="list-style-type: none"> Where the proportion of growth on infill and brownfield sites is not keeping pace with the targets set in the NPF and the RSES, the Council will liaise with the Regional Assembly to establish reasons and coordinate actions to address constraints to doing so.
		<ul style="list-style-type: none"> Instances where contaminated material generated from brownfield and infill must be disposed of 	<ul style="list-style-type: none"> Dispose of contaminated material in compliance with EPA guidance and waste management requirements 	<ul style="list-style-type: none"> Internal review of grants of permission where contaminated material must be disposed of 	<ul style="list-style-type: none"> Consultations with the EPA and Development Management
		<ul style="list-style-type: none"> Environmental assessments and AAs as relevant for applications for brownfield and infill development prior to planning permission 	<ul style="list-style-type: none"> Screen for and undertake environmental assessments and AA as relevant for applications for brownfield and infill development prior to planning permission 	<ul style="list-style-type: none"> Internal monitoring of grants of permission 	<ul style="list-style-type: none"> Review internal systems
Water	W	<ul style="list-style-type: none"> Status of water bodies as reported by the EPA Water Monitoring Programme for the WFD 	<ul style="list-style-type: none"> Not to cause deterioration in the status of any surface water or affect the ability of any surface water to achieve 'good status' Implementation of the objectives of the second cycle of the River Basin Management Plan by 2021 (and subsequent iterations as relevant) 	<ul style="list-style-type: none"> EPA Monitoring Programme for WFD compliance 	<ul style="list-style-type: none"> Where water bodies are failing to meet at least good status this will be investigated with the DHLGH Water Section, the EPA Catchment Unit, the Regional Assembly and, as relevant, Irish Water to establish if the pressures are related to Plan actions / activities. A tailored response will be developed in consultation with these stakeholders in such a circumstance. Where marine water bodies are failing to meet good ecological status, this will be interrogated with the Marine Institute and the DHLGH to establish if the pressures are related to RSES activities. A tailored response will be developed in consultation with the Marine Institute and DHLGH in such a circumstance. Where planning applications are rejected due to insufficient capacity in the Wastewater treatment

Environmental Component	SEO Code	Indicators	Targets	Sources	Remedial Action
					Plant (WWTP) or failure of the WWTP to meet Emission Limit Values, the Council will consider whether it is necessary to coordinate a response with the EMRA, EPA and Irish Water to achieve the necessary capacity.
		<ul style="list-style-type: none"> Number of incompatible developments permitted within flood risk areas 	<ul style="list-style-type: none"> Minimise developments granted permission on lands which pose - or are likely to pose in the future - a significant flood risk 	<ul style="list-style-type: none"> Internal monitoring of likely significant environmental effects of grants of permission 	<ul style="list-style-type: none"> Where planning applications are being permitted on flood zones, the Council will ensure that such grants are in compliance with the Flood Risk Management Guidelines and include appropriate flood risk mitigation and management measures.
Material Assets	MA	<ul style="list-style-type: none"> Programmed delivery of Irish Water infrastructure for all key growth towns in line with Irish Water Investment Plan and prioritisation programme to ensure sustainable growth can be accommodated Number of new developments granted permission which can be adequately and appropriately served with waste water treatment over the lifetime of the Plan 	<ul style="list-style-type: none"> All new developments granted permission to be connected to and adequately and appropriately served by waste water treatment over the lifetime of the Plan Where septic tanks are proposed, for planning permission to be only granted when applications demonstrate that the outfall from the septic tank will not – in combination with other septic tanks– contribute towards any surface or ground water body not meeting the objective of good status under the Water Framework Directive Facilitate, as appropriate, Irish Water in developing water and wastewater infrastructure See also targets relating to greenfield and brownfield development of land under Soil and broadband under Population and Human Health 	<ul style="list-style-type: none"> Internal monitoring of likely significant environmental effects of grants of permission Consultations with the Irish Water Department of Housing, Local Government and Heritage in conjunction with Local Authorities 	<ul style="list-style-type: none"> Where planning applications are rejected due to insufficient capacity in the Wastewater treatment Plant (WWTP) or failure of the WWTP to meet Emission Limit Values, the Council will consider whether it is necessary to coordinate a response with the EMRA, EPA and Irish Water to achieve the necessary capacity.
		<ul style="list-style-type: none"> Proportion of people reporting regular cycling / walking to school and work above 2016 CSO figures 	<ul style="list-style-type: none"> Increase in the proportion of people reporting regular cycling / walking to school and work above 2016 CSO figures 	<ul style="list-style-type: none"> CSO data Monitoring of the Dún Laoghaire Rathdown County Council's Climate Change Action Plan 2019-2024 	<ul style="list-style-type: none"> Where proportion of population shows increase in private car use above CSO 2016 figures, the Council will coordinate with the Regional Assembly, the DHLGH, DECC and NTA to develop a tailored response.
Air	A	<ul style="list-style-type: none"> Proportion of journeys made by private fossil fuel-based car compared to 2016 National Travel Survey levels of 74% NO_x, SO_x, PM10 and PM2.5 as part of Ambient Air Quality Monitoring 	<ul style="list-style-type: none"> Decrease in proportion of journeys made by private fossil fuel-based car compared to 2016 National Travel Survey levels Improvement in Air Quality trends, particularly in relation to transport related emissions of NO_x and particulate matter 	<ul style="list-style-type: none"> CSO data Data from the National Travel Survey EPA Air Quality Monitoring Consultations with Department of Transport and Department of Environment, Climate and Communications 	<ul style="list-style-type: none"> Where proportion of population shows increase in private car use above CSO 2016 figures, Council will coordinate with the Regional Assembly, DHLGH, DECC and NTA to develop a tailored response. See also entry under Population and human health above

Environmental Component	SEO Code	Indicators	Targets	Sources	Remedial Action
Climatic Factors ⁹	C	<ul style="list-style-type: none"> Implementation of Plan measures relating to climate reduction targets as provided for by Plan provisions including those provided for and referenced in Chapter 3 “Climate Action” 	<ul style="list-style-type: none"> For review of progress on implementing Plan objectives to demonstrate successful implementation of measures climate reduction targets as provided for by Plan provisions including those provided for and referenced in Chapter 3 “Climate Action” 	<ul style="list-style-type: none"> Internal monitoring of likely significant environmental effects of grants of permission 	<ul style="list-style-type: none"> Review internal systems
		<ul style="list-style-type: none"> A competitive, low-carbon, climate-resilient and environmentally sustainable economy 	<ul style="list-style-type: none"> Contribute towards transition to a competitive, low-carbon, climate-resilient and environmentally sustainable economy by 2050 	<ul style="list-style-type: none"> Monitoring of the Dún Laoghaire Rathdown County Council's Climate Change Action Plan 2019-2024 EPA Annual National Greenhouse Gas Emissions Inventory reporting Climate Action Regional Office Consultations with Department of Environment, Climate and Communications 	<ul style="list-style-type: none"> Where targets are not achieved, the Council will liaise with the Regional Assembly and the Dublin Climate Action Regional Office to establish reasons and develop solutions.
		<ul style="list-style-type: none"> Share of renewable energy in transport 	<ul style="list-style-type: none"> Contribute towards the target of the Renewable Energy Directive (2009/28/EC), for all Member States to reach a 10% share of renewable energy in transport by facilitating the development of electricity charging and transmission infrastructure, in compliance with the provisions of the Plan 		
		<ul style="list-style-type: none"> Carbon dioxide (CO₂) emissions across the electricity generation, built environment and transport sectors 	<ul style="list-style-type: none"> Contribute towards the target of aggregate reduction in carbon dioxide (CO₂) emissions of at least 80% (compared to 1990 levels) by 2050 across the electricity generation, built environment and transport sectors 		
		<ul style="list-style-type: none"> Energy consumption, the uptake of renewable options and solid fuels for residential heating 	<ul style="list-style-type: none"> To promote reduced energy consumption and support the uptake of renewable options and a move away from solid fuels for residential heating 		
		<ul style="list-style-type: none"> Proportion of journeys made by private fossil fuel-based car compared to 2016 levels 	<ul style="list-style-type: none"> Decrease in the proportion of journeys made by residents of the County using private fossil fuel-based car compared to 2016 levels 	<ul style="list-style-type: none"> CSO data Monitoring of the Dún Laoghaire Rathdown County Council's Climate Change Action Plan 2019-2024 	<ul style="list-style-type: none"> Where trends toward carbon reduction are not recorded, the Council will liaise with the Regional Assembly and the Dublin Climate Action Regional Office to establish reasons and develop solutions.
		<ul style="list-style-type: none"> Proportion of people reporting regular cycling / walking to school and work above 2016 CSO figures 	<ul style="list-style-type: none"> Increase in the proportion of people reporting regular cycling / walking to school and work above 2016 CSO figures 	<ul style="list-style-type: none"> CSO data Monitoring of the Dún Laoghaire Rathdown County Council's Climate Change Action Plan 2019-2024 	<ul style="list-style-type: none"> Where proportion of population shows increase in private car use above CSO 2016 figures, the Council will coordinate with the Regional Assembly, the DHLGH, DECC and NTA to develop a tailored response.
Cultural Heritage	CH	<ul style="list-style-type: none"> Percentage of entries to the Record of Monuments and Places, and the context these entries within the surrounding landscape where relevant, 	<ul style="list-style-type: none"> Protect entries to the Record of Monuments and Places, and the context of these entries within the surrounding landscape where relevant, from adverse effects resulting from development which is granted 	<ul style="list-style-type: none"> Internal monitoring of likely significant environmental effects of grants of permission 	<ul style="list-style-type: none"> Where monitoring reveals visitor or development pressure is causing negative effects on designated archaeological or architectural heritage, the Council will work with Regional Assembly, Fáilte Ireland and the National Monuments Service and

⁹ Please also refer to relevant legislation and requirements under Section 4.10, Section 8.6, Section 8.8.3 and Appendix I of the main SEA Environmental Report. Targets under the national Climate Action Plan are reviewed and updated periodically and include those under the headings of Electricity, Built Environment, Transport, Agriculture, Forestry & Land Use and Enterprise.

Environmental Component	SEO Code	Indicators	Targets	Sources	Remedial Action
		protected from adverse effects resulting from development which is granted permission under the Plan	permission under the Plan		other stakeholders, as relevant, to address pressures through additional mitigation.
		<ul style="list-style-type: none"> Percentage of entries to the Record of Protected Structures and Architectural Conservation Areas and their context protected from significant adverse effects arising from new development granted permission under the Plan 	<ul style="list-style-type: none"> Protect entries to the Record of Protected Structures and Architectural Conservation Areas and their context from significant adverse effects arising from new development granted permission under the Plan 	<ul style="list-style-type: none"> Consultation with Department of Housing, Local Government and Heritage 	
Landscape	L	<ul style="list-style-type: none"> Number of developments permitted that result in avoidable adverse visual impacts on the landscape, especially with regard to landscape and amenity designations included in Land Use Plans, resulting from development which is granted permission under the Plan 	<ul style="list-style-type: none"> No developments permitted which result in avoidable adverse visual impacts on the landscape, especially with regard to landscape and amenity designations included in Land Use Plans, resulting from development which is granted permission under the Plan 	<ul style="list-style-type: none"> Internal monitoring of likely significant environmental effects of grants of permission 	<ul style="list-style-type: none"> Where monitoring reveals developments permitted which result in avoidable adverse visual impacts on the landscape, the Council will re-examine Plan provisions and the effectiveness of their implementation



An
Bord
Pleanála

Inspector's Report ABP 310625-21.

Development

Development consisting of demolition of existing dwelling and construction of part-6 to part-8 No. storey over basement residential development comprising 72 No. units, car parking spaces, landscaping and all associated site works.

Location

0.4167 Ha site at Waterville, Old Glenamuck/Golf Lane, Carrickmines, Dublin 18 and, adjacent lands to the west bounded by Old Glenamuck/Golf Lane, and Glenamuck Road, Carrickmines, Dublin 18.

Planning Authority

Dún Laoghaire-Rathdown Co. Council

Planning Authority Reg. Ref.

D21A/0269

Applicants

Ren Shu

Type of Application

Permission

Planning Authority Decision

Refuse permission

Type of Appeal

First Party

Appellant	Ren Shu
Observers	None
Date of Site Inspection	13/10/21
Inspector	Siobhan Carroll

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1.0 Site Location and Description

- 1.1. The appeal site is situated immediately to the east of the roundabout at the Glenamuck Road South. Golf Lane bounds the site to the south-east. Junction 15 of the M50, Carrickmines is situated 280m to the north. Ballyogan Wood Luas stop is located 680m to the north-west. The no. 63 bus route serves the area it links Dún Laoghaire and Kilternan.
- 1.2. The Park shopping centre at Carrickmines is located to the west. It contains over thirty retail units and is served by cafes and fast food restaurants. Development has commenced on a neighbourhood centre at Quadrant 3 at 'The Park'. It will contain retail units, restaurant/café uses, cinema and other leisure space, residential units, crèche, office space, car showroom, medical centre and a linear park. It includes a new Ballyogan Link road which will provide pedestrian access from the Ballyogan Wood Green line Luas stop into the park.
- 1.3. Golf Lane is a cul de sac which extends for circa 850m. It is characterised by a mix of new residential development and low density single housing to the east. The entrance to Carrickmines Golf Course is located at the end of the lane. The surrounding areas of Carrickmines, Glenamuck, Kilternan and Ballyogan are currently undergoing development as they represents some of the main areas of growth within Dún Laoghaire-Rathdown.
- 1.4. The site has a stated area of 0.4167hectares and it comprises the plot of a detached single storey dwelling 'Waterville'. The property is served by a gated vehicular accessed off Golf Road. The neighbouring property to the east is a large, detached dwelling 'Shanagran'. To the north-east of this is a woodland area where permission has been granted for a scheme containing 482 no. apartments.
- 1.5. The residential scheme Carrickmines Green is situated to the south of the site. It comprises a mix of apartments and dwellings. The apartment buildings within the scheme are five storeys high. Two apartment buildings within the scheme directly address the roundabout at the Glenamuck Road South.

2.0 Proposed Development

- 2.1. Permission is sought for the development consisting of the following;

- Demolition of the existing dwelling (98sq m).
- Construction of a part-6 to part-8 No. storey over basement residential development (7,213sq m) comprising 72 No. units (14 No. studios, 16 No. 1 beds, 40 No. 2 beds and 2 No. 3 beds), all with associated balconies/terraces facing north, south, east and west.
- The development will also include the upgrading of the site entrance from Golf Lane to the south-east of the site.
- Pedestrian access from Glenamuck Road.
- 56 No. car parking spaces.
- Bicycle parking; bin store; boundary treatments; hard and soft landscaping; plant; photovoltaic panels; green roofs; sub-station; lighting; and all other associated site works above and below ground.

3.0 Planning Authority Decision

3.1. Decision

Permission was refused for seven reasons;

1. The proposed development includes a vehicular access directly off the Old Glenamuck Road, close to the Glenmuck Roundabout. It is considered that the proposed development would endanger public safety by reason of traffic hazard due to the additional traffic turning movements generated onto this road, which is the future Kilternan Link Road (included as a Roads Objective in Table 2.2.5 and Table 2.2.6 of the Dún Laoghaire-Rathdown County Development Plan 2016-2022 under the heading 'Cherrywood SDZ (necessary roads infrastructure as detailed in Cherrywood SDZ Planning Scheme)' and shown in Map 4.5 of the Cherrywood Planning Scheme. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.
2. It is considered that the proposed development would endanger public safety due to inadequate safe pedestrian facilities along desire line to/from the proposed development. In the absence of infrastructure, it is considered that

the inadequate safe direct pedestrian facilities along desire lines to/from the proposed development would endanger public safety by reason of traffic hazard and would have a serious adverse impact on the safety of pedestrians to/from the proposed development would endanger public safety by reason of traffic hazard or obstruction of road users or otherwise, as per Clause 4 of the FOURTH SCHEDULE (Reasons for the refusal of permission which Exclude Compensation) of the Planning & Development Act 2000. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

3. The proposed development is considered to represent piecemeal development, in that the proposed access arrangement would set an undesirable precedent for similar vehicular access point off the Old Glenamuck Road which is included as a Road Objective in Table 2.2.5 & Table 2.2.6 of the Dún Laoghaire-Rathdown County Development Plan 2016-2022 under the heading Cherrywood SDZ (necessary roads infrastructure as detailed in Cherrywood SDZ Planning Scheme) and shown in Map 4.5 of the Cherrywood Planning Scheme. This road is expected to be heavily trafficked once completed. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.
4. Regarding the future Kilternan Link Road, as required by the Cherrywood Planning Scheme, future traffic impacts and safety implications of the proposed access junction into/from the site, have not been assessed by the applicant. In this regard, it is considered that the proposed development could potentially have an adverse impact on the function of the Kilternan Link Road, as a Level 2 (50km/h) road and as a sustainable travel route, and on the safety of future users of the Kilternan Link Road. In addition, individual vehicular accesses to development sites along the future Kilternan Link Road are not favoured and could also potentially undermine the function of the Kilternan Link Road. Finally, the designed location of the proposed basement and other proposed infrastructure elements for the proposed development conflict with the location of the Kilternan Link Road reservation boundary. It is considered that this could potentially have an adverse impact on the buildability of the future Kilternan Link. In this regard, the proposed

development is therefore considered to be inconsistent with Objective PI 14 and Map 4.5 of the Cherrywood Planning Scheme and would be thereby contrary to the proper planning and sustainable development of the area.

5. The proposed development, by reason of its density, scale, massing height and unit mix, is considered to constitute overdevelopment of the site. The proposed development is thereby considered to be contrary to the Ballyogan & Environs Local Area Plan, 2019, the current County Development Plan and to the Urban Development and Building Heights, Guidelines for Planning Authorities (2018; DoHPLG). The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.
6. Having regard to the height, scale and proximity of the proposed development to the residential property, Shanagran, it is considered that the proposed development would be visually overbearing when viewed from this property and would result in overshadowing and therefore seriously injure the residential amenities and depreciate the value of this property. The proposed development would therefore materially contravene the zoning objective for the area, which is 'to protect and or improve residential amenity' and therefore would be contrary to the proper planning and sustainable development of the area.
7. The subject site is considered to be located in a suburban location therefore, the Planning Authority considers that the proportion of single aspect apartments in the proposed development would contravene SPPR4 of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities. The proposed development would fail to provide an adequate level of residential amenity for future occupants of the scheme and would be contrary to Ministerial Guidelines issued to Planning Authorities under Section 28 of the Planning and Development Act, 2000, as amended. The proposed development would therefore, be contrary to the proper planning and sustainable development of the area.

3.2. Planning Authority Reports

3.2.1. Planning Reports

- The report of the Planning Officer concluded that in relation to the planning history on the site (Reg. Ref. D18A/0579) that the previous reasons for refusal were not fully overcome in the current application. There are serious concerns in respect of the development that it would constitute a traffic hazard and piecemeal development. That it would have a serious impact on the adjoining residential property 'Shanagran' in terms of overbearing and overshadowing. That the proposed height of the development is not in accordance with the provisions of the Ballyogan and Environs Local Area Plan 2019 and the Building Height Guidelines for Planning Authorities. The report also referred to concerns in relation to the quality and quantum of open space and car parking. The Development Agency Project Team recommended refusal on the basis that the proposed development would be premature and would result in significant traffic impacts and that it would be inconsistent with the Cherrywood Planning Scheme.

3.2.2. Other Technical Reports

Transportation Planning – Refusal recommended.

Cherrywood Development Agency Project Team – Refusal recommended.

Drainage Planning – Further information requested.

Parks Department – Refusal recommended.

Environment Department – No objection subject to condition.

Housing Department – No objection subject to condition.

Public Lighting – Further information requested.

3.3. Prescribed Bodies

Irish Water – No objection.

Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media – In relation to archaeology it is noted that the development site is located in the historic area of Carrickmines and in proximity to a Recorded Monument (DU026-005001)- Carrickmines Castle). It is recommended that conditions referring to pre-

development archaeological assessment be included in a grant of planning permission.

Inland Fisheries Ireland – The proposed development is located on the Carrickmines river system with the Golf stream running through the site. It is important that salmonid water constraints apply to any development in this area. Should development proceed, best practice should be implemented at all times in relation to any activities that may impact on surface water or riparian habitats. Any discharges to surface streams present on or near the site must not impact negatively on the salmonid status of the system. Comprehensive surface water management measures must be implemented at the construction and operational stage to prevent any pollution of local surface waters.

Environmental Health Officer – the proposal is acceptable subject to conditions.

Transportation Infrastructure Ireland – The Authority will rely on the Planning Authority to abide by official policy in relation to development on/affecting national roads as outlined in DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012), subject.

An Taisce – An objection to the proposed scheme is made. It is noted that part of the site is in flood zone A with the rest of the site in flood zone C. Recently permitted scheme of 482 no. apartments (ABP 309026-20) on the adjacent site

3.4. Third Party Observations

- 3.4.1. The Planning Authority received three submissions/observations in relation to the application. The main issues raised concerns regarding traffic generation, the height and scale of the proposed development, overlooking, overshadowing and overbearing.

4.0 Planning History

Site

Reg. Ref. D18A/0579 – Permission was refused for the demolition of the dwelling on site 'Waterville' and the construction of 5 no. three-storey 3 bedroom houses with underground basements, a four-storey apartment block containing 8 no. two

bedroom and 4 no. one bedroom apartments with underground basement.

Permission was refused for seven reasons.

Reg. Ref. D11A/0197 & PL06D.239236 – Permission was refused for the demolition of the dwelling on site 'Waterville' and the construction of 19 no. apartments in two blocks

Adjacent Sites

ABP 309026-20 – Permission was granted for a Strategic Housing Development of 482 no. units comprising apartments within 7 no. blocks ranging in height from 6 to 22 stories and a childcare facility, gym and local shop. The site is situated to the north-east of the subject site.

ABP 302336-18 – Permission was refused for a strategic housing development on a site of 2.6 hectares comprising the former residential properties of 'Tintagel', 'Auburn', 'Keellogues', 'Villa Nova' & 'Arda Lodge' and adjoining lands. The site is situated to the north-east of the subject site.

Reg. ref. D18A/0257 & ABP 304396-19 – Permission was granted for development at Quadrant 3, the Park Carrickmines. The development comprises a neighbourhood centre (including retail, retail services and restaurant/café uses), retail warehouses, cinema and other leisure space, residential units, crèche, office space, car showroom, medical centre, linear park and associated infrastructural works. The site is situated to the north-west of the subject site at the Park Shopping Centre.

ABP303945 – Permission was granted for Glenamuck District Roads Scheme which will connect the existing R117 Enniskerry Road with the Glenamuck Road and new link distributor road which will connect to the Ballycorus Road and the R117 Enniskerry Road.

Reg. Ref. D18A/1175 & ABP 304642-19 – Permission was granted for a residential scheme comprising 48 no. apartments within a 4/5 storey block at the Glen, Golf Lane. The site is situated to the east of the subject site.

5.0 Policy Context

5.1. Project Ireland 2040 - National Planning Framework

- 5.1.1. The NPF includes a Chapter, No. 6 entitled 'People, Homes and Communities'. It sets out that place is intrinsic to achieving good quality of life. National Policy Objective 33 seeks to "prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location".
- 5.1.2. National Policy Objective 35 seeks "to increase residential density in settlements, through a range of measures including restrictions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights".
- 5.1.3. National Planning Objective 13 also provides that "In urban areas, planning and related standards, including in particular height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected".

5.2. Section 28 Ministerial Guidelines

- 5.2.1. The following is a list of section 28 Ministerial Guidelines considered of relevance to the proposed development. Specific policies and objectives are referenced within the assessment where appropriate.
- 'Urban Development and Building Heights' Guidelines for Planning Authorities
 - 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (including the associated 'Urban Design Manual')
 - 'Design Manual for Urban Roads and Streets' (DMURS)

- ‘The Planning System and Flood Risk Management’ (including the associated ‘Technical Appendices’)
- ‘Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities

5.3. Dún Laoghaire – Rathdown County Development Plan 2016-2022

- 5.3.1. The site is zoned Objective ‘A’ with a stated objective ‘to protect and/or improve residential amenity’.
- 5.3.2. The site is zoned ‘Objective A’ which seeks to ‘protect and/or improve residential amenity’. A small section of the site is zoned under the ‘Boundary of the Adopted Cherrywood Planning Scheme’ as it overlaps Golf Lane and relates to planned road linkages to the SDZ area. A portion of the site to the north east is also zoned under ‘Record of Monuments and Places (For Areas of Archaeological Potential)’.
- 5.3.3. Objective 131 relates to lands to the northwest of the site where it is an objective to provide for the development of a Neighbourhood Centre in the north-east ‘quadrant of the Park, Carrickmines, with a net retail floorspace cap of 6000 sq.m. and a leisure facility, which will help meet the existing and future retail and leisure needs of the growth areas of Carrickmines, Stepside-Ballyogan and Kiltiernan-Glenamuck’.
- 5.3.4. SLO 135 relates to the Local Area Plan for Ballyogan and Environs, covering the area within which the subject site lies in.
- 5.3.5. Objective 161 aims ‘to conserve and protect Carrickmines Castle site and to proceed to implement the Carrickmines Castle Conservation Plan 2015-2025’
- 5.3.6. SLO 52 which aims “to implement and develop the lands at Cherrywood in accordance with the approved Strategic Development Zone Planning Scheme.”
- 5.3.7. 6-year and long term roads objectives are outlined in Tables 2.2.5 & 2.2.6 of the operative CDP which include the infrastructure related to the Cherrywood SDZ (necessary roads infrastructure as detailed in Cherrywood SDZ Planning Scheme).

5.4. Ballyogan and Environs LAP 2019-2025

- 5.4.1. The site is located in the Carrickmines Quarter (16-Old Glenamuck Road) as defined in Figure 1.5 – Quarters and Neighbourhoods.

- 5.4.2. Proposed linkages identified in Policy BELAP MOV12 – New Linkages, include links from Glenamuck Link Distributor, The Park Carrickmines and Golf Lane (no.s 17-20 & 27 in Table 4.6)
- 5.4.3. Section 5.1.2 includes a table identifying estimated / approximated capacity for 400 units on development site ‘Golf Lane’
- 5.4.4. Table 5.4 – Target Residential Densities identifies a target density of 55 uph for the subject site area.
- 5.4.5. Table 5.5 – Building Heights states in relation to neighbourhood 16 that ‘The M50 corridor gives capacity for higher buildings in this Neighbourhood
- 5.4.6. Policies BELAP RES3 – Building Height by Neighbourhood, BELAP RES4 – Locations for Higher Buildings and BELAP – Building Height by Scheme, describe the considerations relevant to proposals for taller buildings. The subject site is identified as a suitable location for a “higher building”.
- 5.4.7. Section 5.3.5 describes policies in relation to housing.

5.5. Natural Heritage Designations

- 5.5.1. The nearest Natura 2000 sites are;
- Knocksink Wood SAC is 4.59km to the south of the appeal site.
 - Ballyman Glen SAC is 4.8km to the south of the appeal site.
 - Wicklow Mountains SAC and Wicklow Mountains SPA are 6.17km to the south-west of the appeal site.
 - South Dublin Bay SAC is 5.16km to the north-east of the site.
 - South Dublin Bay and River Tolka Estuary SPA is 5.16km to the north-east of the site.
 - Dalkey Island SPA is 6.3km to the east of the site.
 - Rockabill to Dalkey Island SAC is 5.85km to the east of the site.

5.6. EIA Preliminary Screening

- 5.6.1. An Environmental Impact Assessment Screening Report was not submitted with the planning application.
- 5.6.2. Class (10)(b) of Schedule 5 Part 2 of the Planning and Development Regulations 2001 (as amended) provides that mandatory EIA is required for the following classes of development:
- Construction of more the 500 No. dwelling units
 - Urban development which would involve an area greater than 2 ha is the case of a business district, 10 Ha in the case of other parts of a built-up area and 20ha elsewhere.
- 5.6.3. It is proposed to construct 72 No. residential units. The number of dwellings proposed is well below the threshold of 500 dwelling units noted above. The site has an overall area of 0.4167Ha and is located within an existing built-up area of Carrickmines. The site area is well below the applicable threshold of 10Ha. The site is an infill suburban site. The introduction of a residential development will not have a significant adverse impact in environmental terms on the surrounding land uses. It is noted the site is not designated for the protection of the landscape or of natural or cultural heritage. The proposed development is not likely to have a significant effect on any European Site (as discussed in section 7.6). The proposed development would not give rise to waste, pollution or nuisances that differ from that arising from other housing in the neighbourhood. It would not give rise to a risk of major accidents or risks to human health. The proposed development would use the public water and drainage services of Irish Water and Dún Laoghaire-Rathdown County Council., upon which its effects would be marginal.
- 5.6.4. Having regard to :-
- The nature and scale of the proposed development which is under the mandatory threshold in respect of Class 10 – Infrastructure Projects of Planning and Development Regulations 2011 (as amended)
 - The location of the site on lands that are zoned for residential uses under the provisions of the Dún Laoghaire-Rathdown County Development Plan, and the results of the strategic environmental assessment of the Dún Laoghaire-

Rathdown County Development Plan, under in accordance with the SEA Directive (2001/42/EC)

- The location of the site within the existing built-up urban area, which is served by public infrastructure, and the existing pattern of residential development in the vicinity
- The location of the site outside of any sensitive location specified in article 109 of the Planning and Development Regulations 2001 (as amended).
- The guidance set out in the 'Environmental Impact Assessment (EIA) Guidance for Consent Authorities regarding Sub-threshold Development' issued by the Department of Environment, Heritage and Local Government (2003), and
- The criteria set out in Schedule 7 of the Planning and Development Regulations 2001 (as amended),

5.6.5. I have concluded that by reason of the nature, scale and location of the subject site, the proposed development would not be likely to have significant effects on the environment and that on preliminary examination an environmental impact assessment report for the proposed development was not necessary in this case.

6.0 The Appeal

6.1. Grounds of Appeal

A first party appeal has been Thornton O'Connor Town Planning on behalf of the applicant Ren Shu. The issues raised are as follows;

- The Planning Authority refused permission under Reg. Ref. D21A/0269 for 7 no. reasons. It is submitted that the key issue refers to whether the supporting documentation provided with the application has proven that there will be no material impact on the implementation of the Kilternan Distributor Road as envisaged in the Cherrywood Planning Scheme and whether the part 6 to part 8 storey residential development will negatively impact on the residential amenity of the residential property 'Shanagran' to the east.

- The recent decision of the Board to grant permission on the 20th of April 2021 in respect of the Strategic Housing Development at Golf Lane, Glenamuck Road under ABP 309026-20 is cited as of relevance to the consideration of the current proposal.
- Refusal reason no. 1 refers to potential impacts on the future Kilternan Link Road. It is submitted that the Planning Authority in assessment of the proposal did not consider the An Bord Pleanála assessment of the permitted Strategic Housing Development on Golf Lane under ABP 309026-20. It is highlighted that the Board was satisfied that Golf Lane SHD which is significantly larger in scale than the proposed scheme would not adversely impact on the implementation and the operation of the Kilternan Link Road in the future.
- The first party dispute that the traffic movements associated with the development would 'endanger public safety by reason of traffic hazard due to the additional traffic turning movements generated onto this road.'
- A Traffic and Transportation Assessment was prepared by Trafficwise and submitted with the application. In the assessment it is anticipated that traffic at peak hours is 3 no. arrivals and 12 no. departures (15 no. two-way movements). It is noted that the Inspector of the Golf Lane SHD (under ABP Ref. 309026-20) referred to an anticipated 25 no. arrivals and 107 no. (132 no. two-way movements) departures in the morning. In the evening peak 77 no. arrivals and 29 no. departures (108 no. two-way movements) were forecast. The first party submit that the refusal is unwarranted and that the proposed development will not endanger public safety by reason of traffic hazard as a result of the additional traffic turning movements generated onto the road.
- It is highlighted that the Board has very recently considered a much larger scale development with a greater number of movements is appropriate on the future Kilternan Link Road. Therefore, it is submitted that there is no tangible evidence to suggest that the proposed development would endanger public safety by reason of traffic hazard due to the additional traffic turning movements generated onto the future Kilternan Link Road.

- Refusal reason no. 2 referred to inadequate safe pedestrian facilities along desire lines to/from the proposed development. In response to the matter the first party refer to the report of the Inspector for the Golf Lane SHD ABP Ref. 309026-20. It is noted in the report that 'the Kilternan Link Road is at proposal stage with final design details and approval yet to be formalised'. The report of the Inspector stated, 'this future road would necessitate the removal of landscaping shown as part of the proposed development, including a number of trees, however as final designs for the road are yet to be formalized, it is not certain exactly how the southern edge of the subject site would alter to accommodate the road...any alteration to the southern edge of the application site to accommodate this road in future would be subject to separate assessment and approval of details for the road. On the basis of the submitted details, I am satisfied that the proposed development is compatible with future aspirations for the road, and that conditions (as described above) can secure this compatibility in the event that planning permission is granted for the proposed development. I am therefore satisfied that the proposed development is not premature pending completion of these works.'
- It is highlighted in the appeal that the Kilternan Link Road has remained at a 'notional stage' throughout the lifetime of the development plan. The pedestrian and cycle routes proposed under the application are designed to connect to both Glenamuck Road South and Golf Lane. Regarding the pedestrian crossing on the Glenamuck Link Road to 'The Park', Carrickmines it is noted a condition attached to the Golf Lane SHD requires the implementation of such a crossing. It is acknowledged that the applicant cannot rely on the delivery of infrastructure on lands outside their control. Therefore, it is suggested that a condition be attached to a grant of permission stating that no units within the scheme can be occupied until the pedestrian infrastructure is delivered.
- It is submitted that the scheme has been designed with due regard to the need for pedestrian connectivity.
- Refusal reason no. 3 refers to piecemeal development. It states that the proposed development is considered to represent piecemeal development in that the proposed access arrangements would set an undesirable precedent

for similar vehicular access point off the Old Glenamuck Road. It is submitted that the recently granted Golf Lane SHD has set a precedent for the appropriate development of these residential zoned lands along Golf Lane including providing vehicular access. The first party question how a single vehicular access point would set an undesirable precedent when an access point to a much larger scheme was very recently granted from the same road and was deemed appropriate. It is noted that an access point already exists to serve the dwelling on site and that a farm gate serves the western portion of the lands. The design team have considered the future development of the Kilternan Link Road and provided in their multi-disciplinary expert opinions a reasonable setback for the implementation of this road infrastructure.

- Refusal reason no. 5 refers the overdevelopment of the site. It states, the proposed development, by reason of its density, scale, massing, height and unit mix, is considered to constitute overdevelopment of the site. It is submitted that Planning Authority in their assessment of the application failed to have regard to the direction provided by the Board in relation to the density of the development. The proposed density is 173 no. units per hectare. The documentation submitted with the application provided robust evidence for the site being considered as a 'Central and Accessible urban Location' having regard to the criteria set out in the Apartment Guidelines, 2020. However, the Planning Officer in their assessment considered that 'the density proposed is significantly higher than the density identified within the Ballyogan and Environs LAP (55uph). The Planning Authority consider that the proposal is compatible to what would normally be expected in a central and accessible urban location and given that the subject site is located in an intermediate suburban location, it is considered excessive.'
- Therefore, it is clear that the Planning Authority would consider that the density would be acceptable in a 'Central and Accessible Urban location' however they consider the site to be an 'Intermediate Suburban Location'. In comparison the Golf Lane SHD scheme recently granted directly to the north of the site has a net density of 268 no. units per hectare. The Planning Inspector in assessing the application stated, 'I also note the proximity of the site to Carrickmines Retail Park, where a range of shops and facilities exists,

albeit lacking a supermarket as highlighted in observer responses. The retail park is an employment location in my view, which also falls under the description of central/accessible locations in the guidelines.'

- It is highlighted that the site is located in close proximity to the Luas Green Line, where 2 no. stops and a closed station (Racecourse) are within 580-680 metres of the site. The closest stop is Ballyogan Wood to the north-west which is circa 10 minutes walk.
- Regarding the height, scale and massing of the proposed development, it is submitted that the height of the development is appropriate to demarcate a key junction of routes and achieve a sufficient density of development for a central and accessible site. The height in the scheme ranges between part 6 storeys to part 8 storeys. It is highlighted that the tallest elements follow the curvature of the Glenamuck Road to the west which is the least sensitive boundary and that the proposal provides an appropriate demarcation of Golf Lane on approach. It is considered that the height and massing of the development would establish an appropriately scaled building at the junction of the future Kilternan Link Road. It is submitted that the design of the building which follows the curvature of the Glenamuck Road ensures that it can be assimilated into its context and provide an attractive urban design solution. The height of the building is stepped down on the eastern side to 6 no. storeys and thus reduces the scale and massing when viewed from the low density dwellings to the east.
- In relation to the height of the proposal it is highlighted that regard should be had to the recently granted Golf Lane SHD where heights of up to 18 no. storeys have been permitted. Therefore, it is submitted that this has set a precedent for the subject lands. The proposed scheme will provide an appropriate step down in heights from the 18 no. storeys permitted on the neighbouring site.
- In relation to the matter of unit mix, the report of the Planning Officer acknowledges that the unit mix within the proposed development has been designed in accordance with the Apartment Guidelines. However, the report of the Planning Officer referred to the mix being below Development Plan

policy. They referred to policy RES7 of the Development Plan and also Section 8.2.3.3(iii) of the Plan which, such that larger schemes over 30 units should generally comprise of no more than 20% 1-bed units and a minimum of 20% of units over 80sq m. It was noted in the report of the Planning Officer that approximately 43% of all apartment units proposed would provide floor areas in excess of 80sq m in area, the one bedroom units of the proposed development would provide for a 22.2% proportion of same. The Planning Officer concluded that the proportion of one bed units would not accord with the provisions of Section 8.2.3.3(iii) of the Plan.

- The Apartment Guidelines, 2020 is the appropriate policy document for assessing the unit mix where no more than 50% one bedroom or studio type units are permitted. It is noted that the report of the Planning Officer accepted that the development comprising 19.4% studio and 22% one bed units was acceptable with reference to the Apartment Guidelines. However, it was concluded that the proposed unit mix was not satisfactory, and it was included in the reason for refusal. It is noted that there are many larger homes in the vicinity of the site including in housing estates in Carrickmines, Kilternan, Glenamuck Road, Ballyogan and Foxrock.
- Refusal reason no. 6 refers to the overbearing nature of the development in relation to the property 'Shanagran'. The first party refute the opinion of the Planning Authority that the proposed development would be a material contravention of the 'Objective A' zoned lands, where it is the stated objective 'to protect and-or improve residential amenity'. The key issue of concern for the Planning Authority referred to the potential for overshadowing and overbearing.
- The Planning Officer considered that the proposed development given its height, orientation of windows and balconies will result in some overlooking into the neighbouring property to the north east 'Shanagran' and south towards 'Beech House'. However, it was noted in the report that given the separation distances proposed between the proposed building and adjoining dwellings and the existing boundaries that the proposal will not unduly compromise the residential amenity of the residential properties in the vicinity by reason of overlooking. It was further stated in the report that it is

considered that the proposal will not unduly comprise the residential amenity of the residential properties within the vicinity by reason of overshadowing. However, it was concluded in the report that concerns arise given the overall height of the building that undue overshadowing will occur onto the adjoining property of 'Shanagran'.

- The documentation submitted with the application includes the Daylight Assessment prepared by BPG3. The technical and quantifiable assessment proves that full compliance with BRE guidelines will be maintained at 'Shanagran' as over 50% of the area assessed is capable of receiving two hours of direct sunlight on the 21st of the March with the proposed development in place. The Daylight Assessment prepared by BPG3 concluded that 'acceptable levels of sunlight access would be retained.'
- In relation to the potential for overbearing from the proposed development, it is reiterated that the recently granted Golf Lane SHD was for a residential scheme which ranged in height from 4-18 storeys and that it is located directly to the north of 'Shanagran'. The distances from 'Shanagran' to the proposed development is similar to that of the Golf Lane SHD scheme. In the case of the Golf Lane SHD scheme, it was noted in the Inspector's report that 'the closest property to the subject site is the dwelling at Creagan. The proposed development is situated a minimum of 27m to the east of Creagan, providing extensive separation distance at this point between the existing dwelling and the proposed block C at 5 storeys in height (with set back 7 storey) at this point.'
- It is noted a similar relationship exists between the current site and 'Shanagran'. A 33.7m minimum separation distance is provided with will ensure that the residential amenity and future development potential of 'Shanagran' is not compromised. A minimum separation distance of 28.4m is provided between the proposed apartment building and the boundary of 'Shanagran'. It is highlighted that the scheme has been designed so that the greatest heights are located closer to the Glenamuck Road where these heights can be more easily absorbed.

- The Inspector in assessing the Golf Lane SHD scheme referred to 18m being an acceptable separation distance to 'future imagined development' whereas the subject scheme provides significantly greater distances. A minimum separation distance of 28.4m is provided.
- It is therefore argued that the low density form of development on the adjacent site should not dictate the form of development on the subject lands. Such low density scheme as no longer considered appropriate for sustainability reasons.
- Regarding refusal reason no. 7 which refers to the inadequate proportion of single aspect apartments, it is stated that the site is located in a central and accessible location as determined by the Board in their assessment of the neighbouring Golf Lane SHD scheme. In respect of dual aspect requirements in Central and Accessible locations it is detailed in the Apartment Guidelines, 2020, that, 'it is a policy requirement that apartment schemes deliver at least 33% of the units as dual aspect in more central and accessible and some intermediate locations, i.e., on sites near to city or town centres, close to high quality public transport or in SDZ areas, or where it is necessary to ensure good street frontage and subject to high quality design.' The Planning Authority in their submission in respect of the Golf Lane SHD, sought 50% dual aspect units. The Planning Inspector noted in the report referring to that SHD scheme that 'the Planning Authority state that they consider the subject site to be an intermediate location under the Apartment Guidelines and therefore requires 50% dual aspect...I consider that the application site can accurately be described as a central/accessible location as defined under the guidelines. Therefore, a minimum 33% for dual aspect units applies.'
- It is submitted that the appropriate standard for the development is 33% dual aspect units. The proposed scheme exceeds the minimum 33% dual aspect unit requirement when only counting corner units it would have 38% dual aspect units.
- Regarding car parking, there are 48 no. additional parking spaces for residents of the scheme which represents an overall parking ratio of 0.77 car parking spaces per unit. It is submitted that this is a sufficient quantum of car

parking for this central and accessible location. It is stated in the report of the Planning Officer that, 'Transportation Planning consider, for an owner occupier development in this location, a minimum car parking ratio of 1 space per apartment acceptable with some additional provision of visitor parking, and therefore that the proposed development is deficient in the provision of car parking spaces.' It is noted that the Golf Lane SHD was granted with a parking ration of 0.6 no. car parking spaces per unit under ABP Ref. 309026-20. Therefore, the proposed scheme provides a higher car parking ratio than the permitted development on adjacent lands.

- In relation to open space, it is the opinion of the applicant's Planning Consultants that the Planning Authority misunderstood the landscaping proposals. It was stated in the report of the Planning Officer, 'the Planning Authority has concerns regarding the proposed public open space and its usability. This portion of the site does not appear to be accessible to the public, with only a small area of raised decking/walkway accessing the area. The Planning Authority has concerns regarding the quantity and quality of open space provision.' In relation to proposed wetland habitat, it is stated in the report that 'the overall approach to the retention of this habitat is generally considered acceptable, however, there are concerns that the raised viewing walkway/platform, stepped access and seating area, is the only access to this piece of land. The overall land is not accessible to the public. The usability of this space is unclear as well as its future management.'
- It is set out that the Landscape Report prepared by Stephen Diamond Landscape Architects clearly illustrated that the wetland habitat would be accessible to the public from Glenamuck Road. It is noted that the quality or quantum of public open space did not form part of the reasons for refusal.
- In conclusion it is the opinion of the applicant's Planning Consultants that the Planning Authority in making the decision on the application has allowed the neighbouring low density houses and the notional future Kilternan Link Road to dictate the form of the development to be provided on the adjacent site. It is submitted that the decision ignores the near identical assessment of many similar issues which referred to the determination of a recently permitted

residential scheme which was granted permission by the Board under ABP 309026-20.

- It is submitted that the Planning Authority failed to acknowledge the central and accessible location of the subject lands which are well connected to public transport and in close proximity to the Park Carrickmines. The report of the Planning Officer acknowledged that the site is suitable for increased heights, however the proposed scheme which ranges in height from 6-8 storeys was considered too height by the Planning Authority.
- It is submitted that the submitted that the proposed scheme is appropriately scaled for the site and that it would not be overbearing due to the separation distances provided and the high-end design solution proposed.

6.2. Planning Authority Response

- The Board is referred to the report of the Planning Officer.
- It is considered that the grounds of the appeal do not raise any new matters which would in the opinion of the Planning Authority justify a change of attitude to the proposed development.

7.0 Assessment

The main issues in this appeal are those raised in the grounds of appeal and it is considered that no other substantive issues arise. The issue of appropriate assessment screening also needs to be addressed. The issues can be dealt with under the following headings:

- Density, Height and Design
- Residential Amenities/Residential Standards
- Impact on amenities
- Access and traffic
- Other issues
- Appropriate Assessment

7.1. Density, Height and Design

Density

- 7.1.1. The lands in question are zoned 'Objective A' – to protect and/or improve residential amenity. The proposal is to demolish 'Waterville' a detached single storey dwelling and construct 72 no. apartments in a part six-storey, part eight-storey building. The existing dwelling subject of this application was built circa 1940's. The site has an area of 0.4167 hectares the proposed density would be equivalent to 173 units per hectare.
- 7.1.2. The Planning Authority in their assessment of the proposal considered that the scheme represented overdevelopment of the site. Refusal reason no. 5 stated that
- 7.1.3. *The proposed development, by reason of its density, scale, massing height and unit mix, is considered to constitute overdevelopment of the site. The proposed development is thereby considered to be contrary to the Ballyogan & Environs Local Area Plan, 2019, the current County Development Plan and to the Urban Development and Building Heights, Guidelines for Planning Authorities (2018; DoHPLG). The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.*
- 7.1.4. In relation to the proposed density, I note Section 8.2.3.2 of the Development Plan recommends the provision of densities at higher than 50 dwellings per hectare at locations readily accessible to public transport corridors – QBCs, Luas, DART.
- 7.1.5. In relation to the provisions of the Ballyogan and Environs Local Area Plan 2019-2025, the site is located in the Carrickmines Quarter (16-Old Glenamuck Road) as defined in Figure 1.5 – Quarters and Neighbourhoods. Section 5.1.2 of the BELAP includes a table identifying estimated / approximated capacity for 400 units on development site 'Golf Lane'. Table 5.4 of the BELAP refers to Target Residential Densities and it identifies a target density of 55 units per hectare for the subject site area.
- 7.1.6. The 'Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities provides the identification of suitable locations for apartment development. The report of the Planning Officer considered that the subject site at Old Glenamuck/Golf Lane would constitute an intermediate urban location. The first

party in response to the matter have argued that the site should be considered a central and/or accessible urban location. In respect of this issue, I note that the under the recently granted Strategic Housing Development scheme (ABP Ref. 309026-20) at Golf Lane that the Planning Inspector determined that the site has central/accessible characteristics and that it is therefore suitable for higher densities. The Inspector came this conclusion based on the site characteristics including that it is located within a reasonable walking distance (less than 800m) to the Ballyogan Luas station. The proximity of the site to 'The Park' at Carrickmines, which is a Retail Park, where there is a range of shops and facilities. The Planning Inspector considered that the retail park is an employment location which falls under the description of central/accessible locations in the Apartment Guidelines. The Board in determining the SHD application at Golf Lane concurred with the assessment and recommendation of the Inspector and were satisfied with the density of the scheme proposed which was equivalent to 188 units per hectare.

7.1.7. I note the assessment carried out by the Inspector in respect of the matter of appropriate density of the development at this location and I consider that the rationale provided in respect of this, namely that the location has central/accessible characteristics given the proximity to 'The Park', Carrickmines and the Luas is therefore acceptable.

7.1.8. Accordingly, on the basis of the precedent established in respect of that recent Board decision I would concur with the case made by the first party in relation to suitability of the site for increased residential density.

Height

7.1.9. Refusal reason no. 5 and no. 6 issued by the Planning Authority in respect of the application referred to the height of the proposed development. The report of the Planning Officer considered that having regard to the overall height of eight stories, with respect to its impact that the proposed development represents an abrupt transition between the existing dwellings and apartments in the immediate area. The Planning Officer concluded in their report that it had not been demonstrated that the proposal would successfully integrate or enhance the character of the public realm.

- 7.1.10. In relation to the height of the proposed apartment building it ranges for six storeys on the eastern side to eight storeys on the western side adjacent to Glenamuck Road South. The proposed height of the building is 27.9m.
- 7.1.11. Section 5.3.4 of the Ballyogan Environs Local Area Plan (BELAP) refers to building height. Policy BELAP RES4 – Locations for Higher Buildings: The locations identified as ‘RES4’ in Glencairn North, Kilgobbin South, Mimosa-Levmoss, Racecourse South, The Park Carrickmines, and Old Glenamuck Road are considered as suitable locations for higher buildings within the BELAP area (see Figure 11.1). Table 5.5 refers to Building Heights and in respect of Neighbourhood 16 – Old Glenamuck Road it advises that The M50 corridor gives capacity for higher buildings in this Neighbourhood.
- 7.1.12. Policy BELAP RES5 refers to Building Height by Scheme. It advises that any planning application for a scheme which proposes buildings in excess of 4 storeys shall be accompanied by an analysis of building height and positioning of buildings. In respect of this matter, I note that an analysis of building height was not submitted with the application.
- 7.1.13. The provisions of ‘Urban Development and Building Heights’ Guidelines for Planning Authorities, is of particular relevance in accessing the proposed development.
- 7.1.14. Specific Planning Policy Requirement (SPPR) 1 of the Building Height Guidelines is noted, - Government policy to support increased building height and density in locations with good public transport accessibility, where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the NPF, RSES and shall not provide for blanket numerical limitations on building heights. In respect of SPPR1 sites which are suitable for increased building height above six storeys are sites in town and city centre areas and in other urban locations with good public transport accessibility.
- 7.1.15. The Guidelines advise in Section 3.2, that the proposed development will be at a scale which satisfies the scale of the district/neighbourhood/street and that the proposed development is appropriate in relation to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light. In respect of access to daylight and sunlight, these matters are addressed in section 7.2 of this report.

- 7.1.16. The Guidelines advise in Section 3.6, that 4 storeys or more can be accommodated alongside existing larger buildings, trees and parkland, river/sea frontage or along wider streets.
- 7.1.17. In relation to the site location, it is in an urban area which has central/accessible characteristics. Regarding the policy in relation to building height as set out in the Table 5.5 of the BELAP that a key consideration regarding building height in Neighbourhood 16 – Old Glenamuck Road is that the M50 corridor gives capacity for higher buildings in this Neighbourhood. Policy BELAP RES4 which refers to locations for higher buildings identifies a number of locations including Old Glenamuck Road as considered suitable locations for higher buildings within the BELAP area. The indicative locations where Policy BELAP RES4 applies are shown on Figure 11.1 of the plan. As illustrated on Figure 11.1 RES4 applies to the residentially zoned lands on the northern side of Golf Lane.
- 7.1.18. Regarding the site context it is situated in an area which is subject to comprehensive urban development including the Q3 scheme at ‘The Park’ Carrickmines and substantial residential development including the permitted SHD at Golf Lane. The site is located close to high quality public transport with the Luas Station at Ballyogan Wood approximately 680m away.
- 7.1.19. Regarding the site context, the section of the Glenamuck Road South which adjoins the site to the west is a dual carriageway between Junction 15 of the M50 and the Glenamuck Road South roundabout. The width of the road way at the section adjacent to the subject site is circa 21m it features a median strip planted with hedging. Accordingly, I note advice in Section 3.6 of the ‘Urban Development and Building Heights’ Guidelines which states that 4 storeys or more can be accommodated alongside existing larger buildings, trees and parkland, river/sea frontage or along wider streets. Glenamuck Road South with a road width of circa 21m is an appropriate location for the proposed apartment building with a height of part six storeys and part eight storeys given the width of the roadway.
- 7.1.20. The subject site is a corner site situated immediately to the east of the roundabout at the Glenamuck Road South. In terms of the character of the existing residential development in the vicinity of the site, the residential scheme Carrickmines Green is situated to the south of the site. It comprises a mix of apartments and dwellings. The

apartment buildings within the scheme are five storeys high and two of the apartment buildings directly address the roundabout. Knockree located to the east is a small scheme of three-storey semi-detached houses and Blackberry Hill located to the east is a scheme of three-storey dwellings.

- 7.1.21. Furthermore, in respect of the site context I would note the height of the apartments permitted by the Board within the SHD at Golf Lane on the neighbouring site to the north-east range from 4 no. storeys to 22 no. storeys. The Board in their direction stated that they were satisfied that the proposed heights as submitted, having regard to the location of the proposed development adjacent to a high frequency public transport corridor, the M50 and the adjoining permitted and existing residential and mixed use developments would be in accordance with the Development Management Principles in section 3.1 and the Development Management criteria set out in section 3.2 of the Urban Development and building height Guidelines 2018. The Board considered that the 22 storeys proposed was appropriate for a landmark building adjacent to the M50 motorway at a key junction to an emerging retail / mixed use and residential area in the Carrickmines/Glenamuck Road area.
- 7.1.22. The permitted scheme under ABP 309026-20 contains the 22 no. storey block located adjacent to the northern site boundary at the M50. The building heights are staggered within the development with a 13 no. storey block located within the centre of the site and then the building heights reduced to 8 no. storeys towards the southern side of the site with 6 no. storeys in Block A1 which is situated to the north-east of the subject site. Having regard to the precedent set with the height of permitted apartment buildings on the northern side of Golf Lane, I consider this establishes a context in which the proposed apartment building of part six storeys and part eight storeys can be considered acceptable in principle.
- 7.1.23. In response the matter of building height it is set out in the appeal that the height of the development is appropriate as it provides a demarcation at a key junction of routes and achieve a sufficient density of development for a central and accessible site. The height in the scheme ranges between part 6 storeys to part 8 storeys. It is highlighted that the tallest elements follow the curvature of the Glenamuck Road to the west which is the least sensitive boundary and that the proposal provides an appropriate demarcation of Golf Lane on approach.

- 7.1.24. The Architectural Design statement prepared by Cantrell & Crowley Architects provides a rationale for the proposed height of the scheme. They stated that by locating the proposal at this distance from the neighbouring site that it provides the opportunity to create a higher more substantial building to occupy this prominent site. They consider that the building acts to terminate the view from Kilternan direction and represents a high quality form of development that adequately address its context and provides abundant visual interest at this important corner on the Old Glenamuck Road.
- 7.1.25. I would consider it is an appropriate location to site the proposed apartment building of this height as the corner site does provide an opportunity to design a building which is a standalone contemporary addition to the streetscape. I would consider the proposed height of the building is acceptable in the context of the existing surrounding development which comprises five storey apartments at Carrickmines Green to the south and also the permitted SHD scheme at Golf Lane to the north-east with apartment buildings ranging from four storeys to twenty two storeys.
- 7.1.26. In conclusion, having regard to the site context, the relevant provisions of the Ballyogan Environs Local Area Plan 2019-2025, the provisions of the Ministerial Guidelines in relation to Building Heights and the recent decision of the Board in respect of the permitted SHD scheme at Golf Lane, I would accept that the principle of an apartment building of part six storeys and part eight storeys can be considered subject to all other relevant planning considerations being satisfactorily addressed.

Design

- 7.1.27. As detailed in the submission from the first party submit it is highlighted that the design of the building follows the curvature of the Glenamuck Road which ensures that it can be assimilated into its context and provide an attractive urban design solution. The height of the building is stepped down on the eastern side to 6 no. storeys and thus reduces the scale and massing when viewed from the low density dwellings to the east.
- 7.1.28. In relation to the proposed design of the apartment building, it is contemporary it includes a flat roof and features a mix of balcony design including cantilevered balconies to the side elevations and projecting elements of the building to the front and rear elevations which contain balconies at first to sixth floor levels. The building

has a maximum length of 108m at ground to seventh floor level. The eight floor is inset 14m at the northern side of the building also inset 10m on the southern side. The proposed stepping down of the building height at the northern and southern side serves to reduce the massing of the proposal.

7.1.29. Regarding the setback of the building from the site boundaries I note that a minimum setback of 28.3m is proposed between the eastern elevation and the eastern boundary with the property 'Shanagran'. At the closest point the building is setback 4.6m from the western site boundary and the building setback 9m from the south-western boundary of the site. As indicated on the Landscape Masterplan, Drawing no: 20-550-SDA-DR-PD-GF-001, new planting is proposed around the site perimeter comprising birch trees and evergreen shrubs. The proposed landscaping and planting will serve to integrate the proposed apartment building into the site.

7.1.30. The proposed apartment building will be in a prominent location. Accordingly, it is important that it is of a high architectural design quality. I consider that it is of a high quality design. In particular the asymmetrical shape of the building along the western elevation which follows the curvature of the site boundary and provides a well designed attractive modern building. The proposed stepping down of the building from eight to six storeys serves to reduce the massing of the proposal. I consider that there is reasonable variety to the elevational treatment of the building and the materials and colour pallet of the external finish provide a good mix of high quality finishes. The proposed finishes include beige brick with light grey/white mortar joints, aluminium panels to windows, doors, balconies and railings, cement cladding to select walls and limestone cladding panels to balcony surrounds. Overall, in terms of the visual impact of the proposed scheme on the surrounding area I consider that the development has been designed well to integrate with the surrounding development.

7.2. Residential Amenities/Residential Standards

Sunlight

7.2.1. In relation to sunlight to windows, the BRE guidelines refer to a test of Annual Probable Sunlight Hours (APSH) to windows. According to the BRE Guidelines a dwelling or non-domestic building which has a particular requirement for sunlight will

appear reasonably sunlit provided the centre of at least one window in the main living room can receive 25% annual probable sunlight hours, including at least 5% of annual probable sunlight hours in winter.

- 7.2.2. The Building Height Guidelines do not explicitly refer to sunlight in proposed accommodation and within Section 3.2 of same it is stated that 'The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light'. Therefore, while daylight and overshadowing are explicitly referenced, there is no specific reference to sunlight, and reference is only to daylight, overshadowing or more generally 'light'. Section 8.2.3.1 of the Dún Laoghaire-Rathdown County Development Plan 2026-2022 refers to Quality Residential Design. It states that it is the objective of the Council to achieve high standards of design and layout to create and foster high quality, secure and attractive areas for living. Criteria which will be taken into consideration includes levels of privacy and amenity, the relationship of buildings to one another including considerations of overlooking, sunlight/daylight standards and the appropriate use of screening devices. Accordingly, an analysis of sunlight is required in this instance.
- 7.2.3. Study F within the report prepared by BPG3 provides an assessment of sunlight amenity to the proposed recreational areas within the scheme. The study contains a sunlight access assessment at all of the windows serving habitable accommodation within the development. 532 no. windows are considered in the assessment.
- 7.2.4. The results of the study are provided both in tabular form on Table 8 and Table 9 and illustrated in plan form on Figure's 15-30 inclusive. Plan form diagrams with indicative coloured windows are utilised to demonstrate BRE compliance with same (i.e. an APSH of 25% or greater and a Winter PSH of 5% or greater). In relation to the proportion of units which conform with strict interpretation of BRE guidelines for annual sunlight access a conformity rate of 73% was found. In relation to the proportion of units which conform with strict interpretation of BRE guidelines for annual sunlight access available during winter months a conformity rate of 69% was found.

- 7.2.5. Accordingly, I am satisfied that the report adequately demonstrates that acceptable levels of sunlight access in accordance with BRE standards, as relates to sunlight levels to living rooms which face 90 degrees of due south are provided.

Daylight

- 7.2.6. In relation to daylight, the BRE 209 guidance, with reference to BS8206 – Part 2, sets out minimum values for ADF that designers/developers should strive to achieve, with various rooms of a proposed residential unit, and these are 2% for kitchens, 1.5% for living rooms and 1% for bedrooms. Section 2.1.14 of the BRE Guidance notes that non-daylight internal kitchens should be avoided wherever possible, especially if the kitchen is used as a dining area too. If the layout means that a small internal galley-type kitchen is inevitable, it should be directly linked to a well-daylit living room. This BRE 209 guidance does not give any advice on the targets to be achieved within a combined kitchen/living/dining layout. However, Section 5.6 of the BS8206 – Part 2: 2008 Code of Practice for Daylighting states that, where one room serves more than one purpose, the minimum average daylight factor should be that for the room type with the highest value. For example, in a space which combines a living room and a kitchen the minimum average daylight factor should be 2%. As such the default ADF value to be applied to a Kitchen/Living/Dining Room (KDL) should be 2%.
- 7.2.7. Section 6.5 of the Apartment Guidelines states that the provision of acceptable levels of natural light in new apartment developments is an important planning consideration as it contributes to the liveability and amenity enjoyed by apartment residents. In assessing development proposals, planning authorities must however weigh up the overall quality of the design and layout of the scheme and the measures proposed to maximise daylight provision with the location of the site and the need to ensure an appropriate scale of urban residential development.
- 7.2.8. In the proposed development, combined open plan kitchen, living and dining spaces are included within the proposed apartment units. The submitted assessment of skylight amenity available within the proposed accommodation (Study D) sets out to achieve a target of 2% for the living/kitchen/dining areas and 1% for bedrooms.
- 7.2.9. Study D within the report prepared by BPG3 provides an assessment of skylight amenity available within proposed accommodation. A total of 174 no. rooms have

been analysed. The results are presented on Table 7 of the report and on Figure's 7-14 inclusive. As indicated on Table 7 the Average Daylight Factor is in excess of the advisory minimum for 160 no. rooms of the 174 no. rooms. In respect of the 14 no. rooms which fall short of the advisory minimum two of the rooms are bedrooms. Room 18 and room 148 refer to bedrooms within a two bedroom unit. I note that in the case of both these rooms the predicted ADF is 0.9 which is marginally under the advisory minimum of 1%. Given the marginal nature of the non-compliance with the advisory minimum standard I would consider that it is acceptable in this context.

- 7.2.10. The 12 no. rooms within the scheme which fall short of the advisory minimum relate to studio apartments. Table 7 in the report sets out the predicted ADF. For rooms 14, 16, 62, 64, 88 and 114 the predicted ADF is 1.4. For rooms 36, 38, 90, 114 and 142 the predicted ADF is 1.3. For room 140 the predicted ADF is 1.2. As detailed in Table 7 it is the professional opinion of the author of the study that adequate levels of internal skylight amenity would be provided. It is acknowledged in the report that while an increase reliance on artificial light can be expected for these spaces the predicted daylight factor distribution indicates that adequate levels of natural light would be provided to local areas proximate to external windows. Therefore, when occupants orientate themselves towards these areas a significant portion of the room will appear adequately daylit.
- 7.2.11. In respect of these rooms within studio apartments, I note that they are single aspect and west facing. The balconies of these studio apartments are designed with glazed balustrades I note that this will serve to increase light penetration into the residential units. Furthermore, I note that floor to ceiling height glazing is proposed which is designed to maximise access to daylight for these units.
- 7.2.12. Having regard to the fact that the predicted ADF's for these rooms are close to the minimum advised for main living rooms of 1.5% ADF with the predicted ADF's being predominately 1.4% and 1.3%, and the fact that as illustrated on Figure's 7-14 that adequate levels of daylight would be provided to the main living areas which are located to the front of the room, I would consider the shortfalls in predicted ADF's would be acceptable in this context as adequate compensatory features such as balconies, aspect, outlook and orientation have been provided.

7.2.13. Accordingly, having regard to the above assessment, in my view the achievement of 92% of the habitable rooms in the development being found to satisfy the advisory minimum for ADF is acceptable.

Overshadowing

7.2.14. The BRE Guidelines recommend that for a garden or amenity area to appear adequately sunlit throughout the year, at least 50% of the area should receive at least two hours of sunlight on March 21st. Study F within the report prepared by BPG3 provides an assessment of sunlight amenity to the proposed recreational areas within the scheme.

7.2.15. As detailed on Table 10 – Sunlight access predicted for outdoor recreation spaces proposed within the development, the two outdoor areas considered within the study (Area 1) the communal outdoor area at podium level and (Area 2) the communal area at terrace level receive in excess of 2 hours sunlight over more than 50% of the area on 21st March, complying with BRE target levels. Having reviewed figure 31 of the submitted assessment I concur with this conclusion and am satisfied that adequate sunlight is achieved to external communal space in the proposed development.

Unit mix

7.2.16. The provisions of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines (2020) sets out there is a need for greater flexibility in terms of apartment mix within proposed schemes. Specific Planning Policy Requirement 1 (SPPR1) states that housing developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. The unit mix within the scheme is 14 no. studios, 16 no. 1 beds, 40 no. 2 beds and 2 no. 3 beds. The percent of proposed studios within the scheme is 19.5% and the percentage of one bed units is 22.2%. I consider that the unit mix is acceptable in this instance, and it is compliant with SPPR1 of the Apartment Guidelines.

Dual aspect

7.2.17. SPPR4 as detailed in the Apartments Guidelines (2020) refers to the requirement for dual aspect units within scheme. It sets out that in relation to the minimum number of

dual aspect apartments that may be provided in any single apartment scheme that a minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate in. In suburban or intermediate locations, it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.

- 7.2.18. Refusal reason no. 7 refers to the concerns of the Planning Authority in respect of the proportion of single aspect apartments in the proposed development and that it would contravene SPPR4 of the Apartments Guidelines for Planning Authorities and therefore would fail to provide an adequate level of residential amenity for future occupants of the scheme.
- 7.2.19. The response from the first party on the matter submits that in the SHD application granted by the Board at Golf Lane, the Planning Inspector in their report considered that the application site could accurately be described as a central/accessible location as defined under the guidelines. Therefore, a minimum 33% for dual aspect units was applied in the assessment of that scheme. The Board agreed with the recommendation of the Inspector to grant permission for the scheme containing 482 no. units under ABP 309026-20.
- 7.2.20. The first party therefore argue that the appropriate standard of dual aspect units within the scheme is 33% dual aspect units. Having assessed the submit floor plans I am satisfied that 38% of the units within the scheme are dual aspect units.
- 7.2.21. As discussed in section 7.1.7 of this report I consider that the location has central/accessible characteristics accordingly the application of a minimum of 33% dual aspects units to the scheme is therefore appropriate. Accordingly, I consider that the provision of dual aspect units with the scheme acceptable in this instance, and it is compliant with SPPR4 of the Apartment Guidelines.

Private amenity space

- 7.2.22. As detailed in the Housing Quality Assessment Table contained in the Architectural Drawings submitted with the application, the proposed private open space areas to serve the residential units range from a minimum of 8sq m to 68sq m. The minimum requirements for private range between 4sq m to 9sq m as per Appendix 1 of the Apartment Guidelines. Accordingly, the apartment units are provided with either a

terrace or balcony of sufficient size which is in accordance with the standards set out in the Apartment Guidelines.

Public open space

- 7.2.23. Section 8.2.8.2 of the Development Plan refers to Public/Communal Open Space. It requires that residential schemes provide an absolute default minimum of 10% of the overall site area for residential developments to be reserved for use as public open and/ or communal space. A communal garden is proposed a ground floor level and a landscaped roof terrace is proposed at level 06. The public open space area proposed to the northern section of the site incorporates the existing watercourse and trees on site. The open space area is accessible via a bridge which links the northern building entrance to Glenamuck Road and the gardens at ground floor level. As detailed in the Housing Quality Assessment Table contained in the Architectural Drawings submitted with the application the total amount of public open space area and communal open space area proposed is 1,446sq m and this represents circa 34% of the total site area. The area of communal open space proposed is 697sq m.
- 7.2.24. Having regard to the standards set out in Appendix 1 of the Design Standards for New Apartments (updated December 2020), the overall communal space provision required for the apartment units is 434sq. m. As such I am satisfied that the standards for communal space have been met in this instance.
- 7.2.25. Accordingly, having regard to the quantum of public/communal open space provided within the scheme and the quality of the design of the communal garden and also the public open space area which incorporates existing site features, I consider the proposed public/communal open space is acceptable.

7.3. Impact on amenities

- 7.3.1. Refusal reason no. 6 refers to the proximity of the proposed development to the residential property, 'Shanagran', it is stated in the refusal that it is considered that the proposed development would be visually overbearing when viewed from this property and would result in overshadowing and therefore seriously injure the residential amenities and depreciate the value of this property. The proposed development would therefore materially contravene the zoning objective for the area, which is 'to protect and or improve residential amenity' and therefore would be

contrary to the proper planning and sustainable development of the area. I shall address the matter of potential impacts on the amenities of neighbouring properties in this section of the report.

Daylight, sunlight and overshadowing

- 7.3.2. There is no specific policy or objective in the Dún Laoghaire-Rathdown County Development Plan 2016-2022 requiring compliance with BRE or BS standards. Section 8.2.31 of the Development Plan refers to Quality Residential Design. It states that it is the objective of the Council to achieve high standards of design and layout to create and foster high quality, secure and attractive areas for living. Criteria which will be taken into consideration includes levels of privacy and amenity, the relationship of buildings to one another including considerations of overlooking, sunlight/daylight standards and the appropriate use of screening devices.
- 7.3.3. The Building Height Guidelines also seeks compliance with the requirements of the BRE standards and associated British Standard (note that BS 8206-2:2008 is withdrawn and superseded by BS EN 17037:2018), and that where compliance with requirements is not met that this would be clearly articulated and justified.
- 7.3.4. The Building Research Establishments (BRE) 'Site Layout Planning for Daylight and Sunlight – A guide to good practice' describe recommended values (eg. ADF, VSC, APSH, etc) to measure daylight, sunlight and overshadowing impact, however it should be noted that the standards described in the BRE guidelines are discretionary and not mandatory policy/criteria (para.1.6). The BRE guidelines also state in paragraph 1.6 that:
- 7.3.5. *"Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design."*
- 7.3.6. The BRE note that other factors that influence layout include considerations of privacy, security, access, enclosure, microclimate etc. in Section 5 of the standards. In addition, industry professionals would need to consider various factors in determining an acceptable layout, including orientation, efficient use of land and arrangement of open space, and these factors will vary from urban locations to more suburban ones. The BRE guidelines state that in relation to daylight to existing buildings:

7.3.7. *“Loss of light to existing windows need not be analysed if the distance of each part of the new development from the existing window is three or more times its height above the centre of the existing window. In these cases the loss of light will be small...” (para. 2.2.4)*

7.3.8. An Assessment of Daylight Levels Associated with the was submitted with the application dated 29th March 2021. In relation to daylight, the BRE Guidelines recommend that neighbouring properties should retain a VSC (this assesses the level of skylight received) of at least 27%, or where it is less, to not be reduced by more than 0.8 times the former value (i.e. 20% of the baseline figure). This is to ensure that there is no perceptible reduction in daylight levels, requiring electric lighting to be needed more of the time.

Daylight

7.3.9. The submitted assessment considers the impacts on daylight and sunlight on the following surrounding properties, ‘Shanagran’, ‘Greenan’ and ‘Beech House’.

7.3.10. The report graphically illustrates where windows have a VSC of greater than 27%. In relation to the windows identified in the neighbouring properties ‘Shanagran’ to the east and ‘Greenan’ to the east, it is illustrated in Table 1 of the report that all of the windows considered had a VSC in excess of 27% with the development in place. In relation to the apartment building Beech House located to the south of the subject site, it is illustrated that all of the windows considered, save for 4 no. on the façade of the building have a VSC of greater than 27% with the proposed development in place. The cases where the VSC levels were found to fall short of the advisory minimum levels refer to windows 5,16, 17 and 18 within Beech House. Secondary testing was carried out in relation to the average daylight factor approach outlined in BS 8206-2: 2008. Regarding the secondary testing, the industry standards regarding modelling assumptions were employed in line with BS 8206-2: 2008, and ADF’s for neighbouring properties were extrapolated as part of the secondary testing and analysis of potential impacts undertaken by the applicant. In relation to average daylight factor, the average daylight factor is used as the measure of general illumination from skylight. It is considered good practice that rooms in dwellings and in most other buildings have a predominantly daylight appearance. The recommended average daylight factor for living room/kitchens is 1.5/2% and for bedrooms is 1%.

7.3.11. In relation to window 5 the principle use of the room served by the window is a bedroom. The existing ADF is 2.4% and the ADF with the development in place is 2.1%. This impact falls within tolerable bounds as with the proposed development in place the advisory minimum associated with this rooms main use is still satisfied. In relation to window 16 the principal use of the room served by the window is living room the existing ADF is 1.1% and the ADF with the proposed development in place is 0.9%. This impact falls within tolerable bounds. Window 17 serves a room where the principal use of the room is a living room. The existing ADF is 1.0% and the ADF with the proposed development in place is 0.9%. This impact falls within tolerable bounds. Window 18 serves a room where the principal use is a living room. The existing ADF is 1.0% and the ADF with the proposed development in place is 1%. This impact falls within tolerable bounds.

Sunlight

7.3.12. The impact on sunlight to neighbouring windows is generally assessed by way of assessing the effect of the development on Annual Probable Sunlight Hours (APSH). The BRE Guidelines suggest that windows (to living rooms and conservatories) with an orientation within 90 degrees of due south should be assessed. According to the BRE Guidelines a dwelling or non-domestic building which has a particular requirement for sunlight will appear reasonably sunlit provided the centre of at least one window in the main living room can receive 25% annual probable sunlight hours, including at least 5% of annual probable sunlight hours in winter.

7.3.13. The report graphically illustrates the impact of the surrounding development on sunlight to surrounding windows. Having regard to the analysis illustrated on Table 3 of the report it is possible to conclude that with the development in place the advisory minimums recommended by the BRE would be satisfied in all cases.

Shadow Analysis

7.3.14. The BRE guidelines recommend using the 21st March for plotting shadow diagrams. In relation to overshadowing, the BRE guidelines state that an acceptable condition is where external amenity areas retain a minimum of 2 hours of sunlight over 50% of the area on the 21st March. The study to assess sunlight levels available to neighbouring recreational areas identified four neighbouring outdoor recreation spaces where altered sunlight levels could potentially register. The areas are

indicated on Figure 4 and are located to the east and south-east of the subject site. The report graphically illustrates existing amenity spaces associated with these neighbouring residential properties. The report states that 100% of the existing properties' back gardens receive over 2 hours of direct sunlight after the proposed development has been constructed. Appendix F of the report contains Shadow Casting Imagery. The findings of the analysis leads to the conclusion that the advisory minimums recommended by the BRE would be satisfied in all cases.

Overlooking/loss of privacy

- 7.3.15. In relation to the issue of overlooking the closest residential properties to the proposed apartment building are 'Shanagran' the neighbouring dwelling to the north-east and 'Beech House' the apartment building located to the south of the site.
- 7.3.16. The separation distance between the proposed apartment building at the closest point and the property 'Shanagran' is 28.2m to the site boundary and 32.5m to the dwelling. Accordingly, the separation distance provided ensures that the proposed development would not result in any undue overlooking.
- 7.3.17. The apartment building 'Beech House' is situated to the south of the site on the opposite side of the junction of Golf Road and the Glenamuck Road South roundabout. Beech House contains balconies to the front elevation of the building which address Golf Road and the roundabout. The southern side elevation of the proposed apartment building would be setback a minimum distance of 34m from the front elevation of 'Beech House'. Having regard to the separation distance provided I am satisfied that that no material overlooking or loss of privacy will occur.

Overbearing

- 7.3.18. Regarding the matter of potential overbearing impact, the report of the Planning Officer stated that the proposed building given its overall height, scale and massing in this specific context would appear visually overbearing and incongruous when viewed from the neighbouring house of 'Shanagran' to the east. In response to the matter the first party set out in the appeal that the separation distance proposed between the subject apartment building and 'Shanagran' is similar to the separation distance provided between 'Shanagran' and the permitted SHD at Golf Lane to the north-east. In the case of the permitted SHD the Planning Inspector noted in their report that a minimum separation distance of 27m was provided to the closest

residential property 'Creagan'. The separation distance of 27m was provided between 'Creagan' and block C which is a part five storey and part seven storey building. It is submitted in the appeal that a similar relationship exists between the current site and 'Shanagran'.

- 7.3.19. It is highlighted in the appeal that the proposed scheme has been designed so that the greatest heights are located closer to the Glenamuck Road where these heights can be more easily absorbed. The minimum separation distance provided between the apartment building and 'Shanagran' is 33.7m. The minimum separation distance between the proposed apartment building and the boundary of 'Shanagran' is 28.4m. I consider that the design of the scheme which includes the stepping down of the building height at the eastern side to six-storeys and the separation distance provided with 'Shanagran' satisfactorily addresses concerns relating to overbearing impact.
- 7.3.20. In conclusion, having reviewed the proposed layout of the scheme relative to the existing surrounding properties, I consider having regard to the proposed siting of the apartment building and relative separation distances to the existing property that the proposed scheme would not result in any material overlooking, overbearing or overshadowing of neighbouring residential properties.

7.4. Access and traffic

- 7.4.1. The first reason for refusal issued by the Planning Authority refers to issues of access and traffic. The Planning Authority determined that the proposed development would endanger public safety by reason of traffic hazard due to the additional traffic turning movements generated onto Old Glenamuck Road, close to the Glenmuck Roundabout. The reason for refusal also referred to the Roads Objective in Table 2.2.5 and Table 2.2.6 of the Dún Laoghaire-Rathdown County Development Plan 2016-2022 for the Kilternan Link Road.
- 7.4.2. The proposal entails the provision of a total of 72 no. dwelling units. It is proposed to upgrade the site entrance for Golf Lane and pedestrian access is proposed from Glenamuck Road.
- 7.4.3. In response to the refusal reason the first party stated that the Planning Authority in assessment of the proposed development did not take into consideration the

assessment which the Board took in determining the permitted Strategic Housing Development on Golf Lane under ABP 309026-20. It is highlighted in the appeal that the Board was satisfied that Golf Lane SHD which is significantly larger in scale than the proposed scheme would not adversely impact on the implementation and the operation of the Kilternan Link Road in the future.

- 7.4.4. In respect of that permitted SHD, I note that the vehicular access is located circa 175m to the north-east of the proposed vehicular access to serve the subject development.
- 7.4.5. Regarding the matter of traffic generated by the proposed scheme, a Traffic and Transportation Assessment was prepared by Trafficwise and was submitted with the application. The TRICS database was used to establish representative traffic generation rates. In relation to traffic generation Table 5.1 in the Traffic and Transportation Assessment sets out the rates of arrivals and departures per hour during peak hours between 0.700 and 19.00. As detailed on Table 5.1 of the assessment it is anticipated that traffic at the peak morning hour of between 0.800-09.00 is 3 no. arrivals and 12 no. departures (15 no. two-way movements). At the peak evening hour of between 17.00-18.00 it is detailed in table 5.1 that 11 no. arrivals and 4 no. departures are anticipated. This also amounts to (15 no. two-way movements). It is concluded in the TTA that given the peak traffic generation is in the order of 15 no. vehicular movements per hour that the impact of the proposed development on the capacity and operation of the receiving road network is not significant. In relation to the Kilternan Link Road it stated in section 10.1.20 of the TTA that it is reasonable to conclude that the modest traffic arising at the proposed development is unlikely to give rise to significant impact upon the operation and capacity of the future link road.
- 7.4.6. The anticipated traffic generated by the proposed scheme is compared in the appeal to the anticipated traffic generated by the permitted SHD at Golf Lane under ABP Ref. 309026-20. As detailed in the report of the Planning Inspector the SHD containing 482 no. residential units was anticipated to generate 25 no. arrivals and 107 no. (132 no. two-way movements) departures in the morning. In the evening peak 77 no. arrivals and 29 no. departures (108 no. two-way movements) were forecast. The Traffic and Transport Assessment Report submitted with that application was prepared by DBFL Consulting Engineers, it concluded there is

adequate capacity in the surrounding road network to accommodate the proposed development. The first party therefore contend that the refusal of permission on the basis of the additional traffic turning movements generated is unwarranted.

- 7.4.7. They have highlighted in the appeal that the Board's recent decision in respect of the Golf Lane SHD is a much larger scale development with a greater number of movements and that it was considered appropriate development at this location in the context of the future Kilternan Link Road. Therefore, the first party submit that there is no tangible evidence to suggest that the proposed development would endanger public safety by reason of traffic hazard due to the additional traffic turning movements generated onto the future Kilternan Link Road.
- 7.4.8. Regarding the level of additional traffic that the scheme would generate, in terms of overall scale and intensity the proposed development it is relatively modest in scale and specifically when compared with the large SHD permitted on the adjacent site at Golf Lane. Having reviewed the Traffic and Transport Assessment Report in respect of the SHD at Golf Lane, I note in relation to road network impact the analysis for Glenamuck Road South/Golf Lane demonstrated that the operational performance of the site access junction on Golf Lane following the implementation of the proposed 482 unit residential scheme has demonstrated that the proposed site access junction will operate well within capacity in the worst case 2038 Future Design Year. In relation to the operational performance of the Glenamuck Road South/Golf Lane roundabout junction it will operate within acceptable operational parameters in all Do-Nothing and Do-Something scenarios. It was concluded in the report that the introduction of the subject development traffic results in a negligible impact on the operational performance of this key off-site junction compared to the Do-Nothing scenario.
- 7.4.9. Accordingly, having regard to the foregoing assessment of the potential traffic impacts of the proposed development, I would consider the surrounding road network has sufficient capacity to deal with level of traffic likely to be generated by the proposed development.
- 7.4.10. In conclusion, I am satisfied that the first party has demonstrated that the existing road network has sufficient capacity to accommodate the traffic which the proposed development would generate.

- 7.4.11. Refusal reason no. 3 stated that the proposed development is considered to represent piecemeal development, in that the proposed access arrangement would set an undesirable precedent for similar vehicular access point off the Old Glenamuck Road which is included as a Road Objective in Table 2.2.5 & Table 2.2.6 of the Dún Laoghaire-Rathdown County Development Plan 2016-2022. This refers to the Kilternan Link Road. The Kilternan Link Road is a new link road is proposed between the M50, the SDZ area, Carrickmines and Kilternan. It is part of the Cherrywood Strategic Development Zone. The Kilternan Link Road is aligned with the southern edge of the site which is currently Golf Lane. It is noted that the road is at proposal stage with final design details and approval yet to be formalised.
- 7.4.12. Refusal reason no. 4 also refers to the future Kilternan Link Road and states that it is considered that the proposed development could potentially have an adverse impact on the function of the Kilternan Link Road and that individual vehicular accesses to development sites along the future Kilternan Link Road are not favoured and could potentially undermine the function of the Kilternan Link Road. Regarding this issue I note that the development boundary of the scheme has been set back from the edge of Golf Lane to accommodate the achievement of the full 24m Kilternan Link Road cross-section. As detailed in the TTA, this proposed setback is similar to the setback provided at the entrance to the Blackberry Hill residential development situated 75m from the site on the opposite of Golf Lane.
- 7.4.13. In response to concerns of the Planning Authority in respect of the provision of individual entrances onto Golf Lane, the first party note that the access point already exists and serving the dwelling on site. It is also highlighted that an access point to a much larger residential scheme was very recently granted permission by the Board from the same road and was deemed appropriate. The appeal also reiterates that the design team considered the future development of the Kilternan Link Road and provided a reasonable setback for the implementation of this road infrastructure. Having regard to the fact that the Board has recently granted permission for a residential scheme with 428 no. units under ABP 309026-20 with vehicular access onto Golf Lane, I am satisfied the Board has determined that direct vehicular access onto this existing section of road is appropriate to provide for the residential development of the zoned and serviced lands at this location to the north of Golf Lane. Furthermore, I am satisfied that the design of the scheme which incorporates a

setback from the edge of Golf Lane is compatible with future aspirations for the road. Accordingly, should the Board decide to grant permission, I would recommend the attachment of a condition specifying that prior to commencement of development that the land required by the planning authority for the future Kilternan Link Road to the south/east boundary of the site shall be reserved for implementation of the road. I note that a condition in respect of this matter was attached to the permission granted for the SHD at Golf Lane under ABP 309026-20.

- 7.4.14. Car parking standards are set out under Table 8.2.3 of the Dún Laoghaire Rathdown Development Plan 2016 – 2022 sets out the car parking standards for residential schemes. Generally, 1 no. car parking space is required for all one bed units, 1.5 spaces per two bed unit. The proposed scheme comprises a total of no. 72 apartments. It contains 14 no. studio apartments, 16 no. one bed apartments, 18 no. two bed units and 2 no. three bed units. The car parking is primarily proposed within the basement with 48 no. spaces proposed. A further 8 no. spaces are proposed at surface level comprising 2 no. accessible spaces, 2 no. car share spaces and 4 no. visitor spaces. In total 56 no. car parking spaces are proposed.
- 7.4.15. Based on the development plan standards 30 no. spaces would be required for the studio apartments and one bed units, 27 no. spaces would be required for the two bedroom units and 4 no. spaces would be required for the three bed units. Accordingly, a total of 61 no. car parking spaces would be required in accordance with Table 8.2.3 of the Development Plan. A total of 56 no. surface car parking spaces are proposed. There would be a shortfall of 5 no. spaces.
- 7.4.16. The first party in response to the matter of car parking state that the proposed scheme provides an overall parking ratio of 0.77 car parking spaces per unit. They submit that this is a sufficient quantum of car parking for this central and accessible location. They noted that the report of the Planning Officer stated that, 'Transportation Planning consider, for an owner occupier development in this location, a minimum car parking ratio of 1 space per apartment acceptable with some additional provision of visitor parking, and therefore that the proposed development is deficient in the provision of car parking spaces.' It is noted in the appeal that the SHD at Golf Lane granted under ABP Ref. 309026-20, which contains 428 no. apartments was granted with a parking ratio of 0.6 no. car parking

spaces per unit. Therefore, the first party submit that the proposed scheme provides a higher car parking ratio than the permitted development on adjacent lands.

- 7.4.17. 'Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities' December, 2020, advises in section 4.18, that the quantum of car parking or the requirement for any such provision for apartment developments will vary, having regard to the types of location in cities and towns that may be suitable for apartment development, broadly based on proximity and accessibility criteria.
- 7.4.18. Regarding public transport provision in the area, I note that the site is located circa 680m from the Luas Station at Ballyogan Wood. Accordingly, the site is within a reasonable walking distance approximately 10 minutes to this high frequency Green Luas Line. Carrickmines Luas Station is situated circa 1km from the site and this station is served by park and ride with a total of 352 no. spaces. The no. 63 bus route also serves the area it links Dún Laoghaire and Kilternan.
- 7.4.19. As detailed in section 4.19 of the New Apartments Guidelines, in central and/or accessible urban locations in larger scale and higher density developments, comprising wholly of apartments in more central locations that are well served by public transport, the default policy is for car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances. As concluded in section 7.1 of this report the site is located in an area which has central/accessible characteristics. Accordingly, I would concur with the case made by the first party in relation to suitability of the site for a reduction in car parking standards in accordance with the provisions of Section 4.19 of the Apartment Guidelines.
- 7.4.20. In relation to pedestrian access, it is proposed that the scheme will be served by a vehicular/pedestrian/cycle access on Golf Lane and a pedestrian/cycle access to the eastern side of Glenamuck Road. This access be situated immediately to the south of the access to 'The Park' and close to the permitted pedestrian crossing which is located immediately to the north of 'The Park' main access. The location of the pedestrian crossing provides access for future residents to 'The Park' and Ballyogan Road without them having to cross the bellmouth left-in-left out access to 'The Park'.
- 7.4.21. While currently these pedestrian crossing arrangements are not in place, the proposed improvements as part of the Q3 development at 'The Park' will be provided

shortly as the permitted scheme is currently under development and this will ensure safe pedestrian links to the Luas Station at Ballyogan Wood.

- 7.4.22. In relation to cycle parking 152 no. cycle parking spaces are proposed. These comprise 110 no. resident spaces and 36 no. visitor spaces. Standards for Cycle Parking and associated Cycle Facilities for New Developments was published by Dun Laoghaire Rathdown County Council in January 2018. Table 4.1 – Cycle Parking for residential development sets out that for apartments that 1 short stay visitor parking space is required for 5 units and that 1 long stay parking space is required per unit. Accordingly, the scheme would require 72 no. cycle spaces to serve the units and 15 no. cycle spaces for visitors. Therefore, in accordance with the requirements set out in Table 4.1 a minimum of 87 no. cycle spaces would be required. Accordingly, the proposed cycle parking within the scheme is in excess of these requirements and is acceptable.

7.5. Other issues

Section 49 Supplementary Development Contribution Scheme

- 7.5.1. The site is located within the area to which the Dún Laoghaire-Rathdown Supplementary Development Contribution Scheme for Extension of the Luas Line B1-Sandyford to Cherrywood applies. The proposed development is therefore liable for a contribution in respect of the scheme should the Board decide to grant permission.

Flood Risk/Drainage

- 7.5.2. The report of the Drainage Planning Section dated 1/4/2021 requested further information. It was stated in the report that it is proposed to locate the attenuation basins in close proximity to the watercourse and Flood Zone A. The report stated that the proposed scheme appears to be reliant on infiltration for discharge from the site, however, evidence that this design approach can be achieved was not provided. The report of the Drainage Planning Section also had concerns in respect of the proposed run-off rates.
- 7.5.3. In relation to the decision to refuse permission issued by the Planning Authority I note that the issues of flooding and drainage and were not included in the refusal of permission.

- 7.5.4. With reference to the Flood Zone Map no. 9 of the Dún Laoghaire-Rathdown County Development Plan 2016-2022 and OPW Flood mapping I note that there is no history of flooding at this location.
- 7.5.5. A Site Specific Flood Risk Assessment Report was submitted with the application. The Golf Stream is adjacent to the northern site boundary, it discharges to the Carrickmines Stream which is a tributary of the Shanganagh River. It is stated in the SFRA that it was part of the site is in Flood Zone A. This is based on Hydraulic Modelling carried out by JBA in respect of the Flood Risk Assessment prepared in relation to Q3 of The Park, Carrickmines. As indicated on Figure 4.1 in the SFRA Flood Zone A is situated within the north-eastern side of the site.
- 7.5.6. It is detailed in the SFRA that no development is proposed within the area of the site located within Flood Zone A. No changes are proposed to be made to the flood plain area on the site. The flood level on site is +79.00mAOD based on the Hydraulic Modelling carried out by JBA. The ground floor level is proposed at +84.00mAOD and the basement car park level is proposed at +80.80mAOD. In relation to the justification test for flood risk, the proposed use of the risk area of the development which is located near the stream is a soft landscaped area. A viewing platform is proposed at the northern area of the site where the wetland planting is located. It is proposed to be constructed as a water compatible structure. The level of the platform is proposed at +80.1mAOD.
- 7.5.7. As detailed in the Water Services Report prepared by CORA Consulting Engineers the surface water strategy is coordinated with the site landscaping to ensure that surface water generated on site is retained on site. All roofs within the scheme are proposed to be covered with sedium. Runoff from the sedium roofs is proposed to be directed to irrigate low level planters and soft landscaping at the ground floor podium level. Run-off from the podium level is proposed to be directed to infiltration basins located in the soft landscaped areas which are adjacent to the stream.
- 7.5.8. It was identified in the source-pathway-receptor analysis that a possible source of flood risk could arise from the surcharging or blockage of the development's drainage system. However, I note that this risk is mitigated by the integrated landscaping and surface water treatment strategy for the site. The strategy surface water strategy will significantly reduce run-off from the site to the public surface

water drainage infrastructure and will also reduce the localised flood risk from the site.

7.5.9. Having regard to the conclusions of the Site Specific Flood Risk Assessment it is considered that the proposed development would not result in displacement of fluvial floodwaters, would not result in an adverse impact to the hydrological regime of the area nor an increase in flood risk elsewhere. The proposed development would therefore be acceptable in terms of flood risk in the area.

7.5.10. Accordingly, I am satisfied with the submitted proposal subject to the details set out above being satisfactorily addressed by condition.

Part V of the Planning and Development Act, 2000, as amended

7.5.11. As detailed in the Planning report submitted with the application, the applicant engaged in Part V discussions with the DLR Housing Department in relation to the provision of Part V units in lieu of the land included in the application. The report of the Housing Department dated the 30th of April 2021 stated that the applicant is proposing to comply with the Part V requirement for the proposed development by way of transfer of 7 units on site. As detailed in the report the Housing Department stated that in order to fully assess the applicant's proposal, they will require in the event that planning permission is granted, a detailed submission to include, inter alia, existing and development use land values, construction, development and any attributable costs associated with the development. It was concluded in the report of the Housing Department that that should a decision be made to grant planning permission for the proposed development a condition be attached requiring the applicant/developer to enter into an agreement in accordance with Part V of the Planning and Development Act, 2000, as amended, prior to commencement, unless the applicant/developer shall have applied for and been granted an exemption certificate under section 97 of the Acts.

7.5.12. It is noted that in the interim since the decision of the Planning Authority was issued on the 26th of May 2021, changes to Part V of the Planning and Development Act, 2000, as amended, have taken effect from the 3rd of September 2021. Accordingly, these new legislative provisions set out timeframes in respect of the percentage Part V requirement. Should the Board decide to grant permission, I would note that the

attachment of the standard condition referring to Part V will satisfactorily address any contingencies which may arise as a result of these legislative changes.

Archaeology

- 7.5.13. The appeal site is located within the historic area of Carrickmines and within proximity (circa 355m) from Recorded (RMP No. DU026-005001) which refers to Carrickmines Castle. The report from the Development Applications Unit of the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media dated the 10th of May 2021 stated that the National Monuments Service recommend that conditions referring to pre-development archaeological assessment be included in a grant of planning permission. Should the Board decide to grant permission, I would recommend that attachment of a condition requiring archaeological appraisal of the site.

Material Contravention

- 7.5.14. Refusal reason no. 6 issued by the Planning Authority stated that, 'the proposed development would therefore materially contravene the zoning objective for the area, which is 'to protect and or improve residential amenity' and therefore would be contrary to the proper planning and sustainable development of the area.' The issue of concern of this relates to the potential for overshadowing and overbearing. Having regard to my assessment as set out in section 7.3 of the report I would not concur with the assessment of the Planning Authority that the proposed development would materially contravene the zoning objective for the area.
- 7.5.15. Section 37(2)(b) of the Planning and Development Act 2000, (as amended) states that the Board may decide to grant a permission even if the proposed development contravenes materially the development plan. Section 37(2)(b) (i)-(iv) lists the circumstances when the Board may grant permission in accordance with section 37(2)(a).
- 7.5.16. Under section 37(2)(b) (i) the proposed development can considered to be of strategic and national importance having regard to its potential to contribute to the achievement of the Government's policy to increase delivery of housing from its current under supply set out in Rebuilding Ireland – Action Plan for Housing and Homelessness issued in July 2016; and (iii) permission for the development should be granted having regard to guidelines under section 28 of the Act, specifically

SPPR 3 of the Building Height Guidelines which states that where a development complies with the Development Management Criteria in section 3.2, it may be approved, even where specific objectives of the relevant development plan or local area plan may indicate otherwise and national policy in Project Ireland 2040 National Planning Framework (in particular objectives 13 and 35). An assessment of the proposed development was carried out to determine that the proposed development conforms with the development management criteria in section 3.2 of those guidelines. I refer the Board to section 7.1 and section 7.2 of this report which addresses these matters in detail.

- 7.5.17. Accordingly, having regard to the details set out above, I am satisfied that a grant of permission, that may be considered to materially contravene the Dún Laoghaire-Rathdown County Development Plan is justified in this instance.

7.6. Appropriate Assessment

Stage 1 Screening

- 7.6.1. An AA screening report is submitted with the application. It was prepared by Moore Group Environmental Services. The report describes the development and identifies that the appeal site is not located within or directly adjacent to any Natura 2000 sites. It addresses a number of sites within a 15km catchment. I have reviewed the NPWS web site and consider that there are no other sites that would be within the zone of influence of the subject site or that have a potential hydrological link to the site.
- 7.6.2. There is an existing watercourse on the northern boundary of the site, the Golf Stream, which discharges to the Carrickmines Stream, a tributary of the Shanganagh River. The Shanganagh River discharges into the coastal waters of Killiney Bay circa 4.5km downstream, within which Rockabill to Dalkey Island SAC and Dalkey Island SPA are located.
- 7.6.3. The nearest European site to the subject site is Knocksink Wood SAC it located circa 4.59km from the site. Ballyman Glen SAC is located circa 4.8km to the south. Knocksink Woods SAC and the Ballyman Glen SAC are situated a higher elevation than that of the site and are located in a separate river catchment. There is, therefore, no scope for the development to negatively impact the groundwater which

feeds these habitats. The qualifying interests of both sites would not be affected by the proposed development.

- 7.6.4. Rockabill to Dalkey Island SAC circa 6.7km to the east and Dalkey Island SPA. The Screening Report considers whether the proposed development would have any potential impact on the qualifying interests and conservation objectives of these sites.
- 7.6.5. The qualifying interests/special conservation interests of the designated sites, are summarised as follows:

Rockabill to Dalkey Island SAC –Site Code (003000)	Dalkey Island SPA –Site Code (004172)
Reefs [1170]	Roseate Tern (<i>Sterna dougallii</i>) [A192]
Harbour porpoise (<i>Phocoena phocoena</i>) [1351]	Common Tern (<i>Sterna hirundo</i>) [A193]
	Arctic Tern (<i>Sterna paradisaea</i>) [A194]

- 7.6.8. The Conservation Objectives for Rockabill to Dalkey Island SAC (003000) is to maintain the favourable conservation condition of Reefs in the SAC, which is defined by a list of attributes and targets and to maintain the favourable conservation condition of Harbour porpoise in the SAC, which is defined by a list of attributes and targets. The Conservation Objective for Dalkey Island SPA (004172) is to maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA.
- 7.6.9. Given that the northern site boundary is adjacent to the Golf stream there is potential for hydrological impacts in the area arising from excavation, surface water runoff and discharge from the subject site during construction phase. The report submitted by Inland Fisheries Ireland noted that the proposed development is located on the Carrickmines river system with the Golf stream running through the site. It supports a resident population of Brown trout and further downstream they support a migratory population of Sea trout a condition is requested in this regard.
- 7.6.10. In relation to the matter of potential hydrological impacts during the construction phase having regard to the distance between the subject site and the European sites

at Killiney Bay there is capacity for dilution of any potential pollutants near the subject site within the local drainage network.

- 7.6.11. During the operational phase, the main potential impacts would arise from surface water run-off and foul drainage. The proposed attenuation measures would reduce variations in the runoff from the site. There is no potential, therefore, for the proposed development to alter the volume or characteristics of the flows into or from the surface water sewerage system that could conceivably have a significant effect on any Natura 2000 site. The foul effluent from the proposed development would drain to the existing Carrickmines Valley Sewer which runs to the Shanganagh wastewater treatment plant. The effluent is treated and then discharged into Killiney Bay. The Rockabill to Dalkey Islands SAC is located off shore approximately 1.4km from the mouth of the Shanganagh River. The proposed development is likely to result in a marginal increase in the discharge of wastewater to the Irish Sea. The development will incorporate SuDS and drain to the municipal system. It is considered that there is no risk that pollutants could reach the European sites in sufficient concentrations to have any likely significant effects on their qualifying interests.
- 7.6.12. In relation to in combination or cumulative effects it is noted in the Screening Report that a number of developments have been permitted in the vicinity of the site at Glenamuck and Carrickmines. Subject to appropriate drainage and wastewater treatment requirements being implemented for these developments then there will be no significant adverse effects due to the proposed project as a result of any in combination effects with these individual planning applications.
- 7.6.13. The proposed development would not be likely to have any significant effects on any Natura 2000 site, either directly or indirectly or in combination with other plans and projects.

AA Screening Conclusion

- 7.6.14. It is reasonable to conclude that on the basis of the information on the file, which I consider adequate in order to issue a screening determination, that the proposed development, individually or in combination with other plans or projects would not be likely to have a significant effect on European Site No. (003000) and European Site No. (004172) or any other European site, in view of the site's Conservation

Objectives, and a Stage 2 Appropriate Assessment (and submission of a NIS) is not therefore required.

8.0 Recommendation

8.1. I recommend a grant of permission.

9.0 Reasons and Considerations

9.1. Having regard to the zoning objective for the site as set out in the Dún Laoghaire Rathdown County Council, 2016 – 2022, the National Planning Framework, 2018 – 2040, the Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009), Urban Development and Building Heights, Guidelines for Planning Authorities, (2018), and the overall scale, design and height of the proposed development, it is considered that, subject to compliance with the conditions set out below, the proposed development would achieve an acceptable standard of urban design and would not seriously injure the residential or visual amenities of the area or of property in the vicinity, would respect the existing character of the area and would be acceptable in terms of traffic and pedestrian safety and convenience. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

10.0 Conditions

1. The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to commencement of development and the development shall be carried out and completed in accordance with the agreed particulars.

Reason: In the interest of clarity.

2. Water supply and drainage arrangements, including the attenuation and disposal of surface water, shall comply with the requirements of the planning authority for such works and services.

Reason: In the interest of public health.

3. The developer shall enter into water and wastewater connection agreements with Irish Water prior to the commencement of this development.

Reason: In the interests of the proper planning and sustainable development of the area.

4. Prior to the commencement of the development, the applicant shall submit to the Planning Authority for its written agreement proposals for the implementation of Mitigation measures identified in the approved Site Specific Flood Risk Assessment for the application. Final details of the appearance of flood flow-path areas shall also be provided and approved by the Planning Authority prior to the commencement of the development.

Reason: In the interest of public health.

5. Prior to commencement of development, land required by the planning authority for the future Kilternan Link Road to the south/east boundary of the site (as indicated in the lodged documentation) shall be reserved for implementation of the road. A drawing illustrating compatibility with the future Kilternan Link Road shall be submitted to the Planning Authority for approval. Details shall include details of the road reservation area, construction of temporary footpaths, future permanent vehicular entrance and the boundary treatment. Future purchasers shall be made aware of agreed details at the point of sale and the applicant shall ensure that the Kilternan Link Road Reservation line is set out by the contractor and agreed with the Planning Authority.

Reason: In the interest of traffic safety and to prevent the development of this area prior to its use for future road improvements.

6. The site access arrangements and the internal road network serving the proposed development, including turning bays, junctions, parking areas, footpaths and kerbs, shall be in accordance with the detailed requirements of the planning authority for such works. All residential parking spaces shall be constructed so as to be capable of accommodating future electric vehicle charging points with a minimum 10% of spaces to be fitted with functional electric vehicle charging points

Reason: In the interests of amenity and of pedestrian and traffic safety.

7. Details of the materials, colours and textures of all the external finishes to the proposed development shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

Reason: In the interest of visual amenity.

8. Details of all boundary treatments shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

Reason: In the interests of visual and residential amenity.

9. The developer shall appoint and retain the services of a qualified Landscape Architect (or qualified Landscape Designer) as a Landscape Consultant, throughout the life of the construction works and shall notify the planning authority of that appointment in writing prior to commencement of development. A practical completion certificate shall be signed off by the Landscape Architect when all landscape works are fully completed to the satisfaction of the planning authority and in accordance with the permitted landscape proposals.

Reason: To ensure full and verifiable implementation of the approved landscape design.

10. Prior to commencement of any permitted development, the developer shall engage the services of a qualified arborist as an arboricultural consultant, for the entire period of construction activity. The developer shall inform the planning authority in writing of the appointment and name of the consultant, prior to commencement of development. The consultant shall visit the site at a minimum on a monthly basis, to ensure the implementation of all of the recommendations in the tree reports and plans. To ensure the protection of trees to be retained within the site, the developer shall implement all the recommendations pertaining to tree retention, tree protection and tree works, as detailed in the submitted Tree Survey Report. All tree felling, surgery and remedial works shall be completed upon completion of the works. All works on retained trees shall comply with proper arboricultural techniques conforming to BS 3998: 2010 Tree Work – Recommendations. The clearance of any vegetation including trees and shrub shall be carried out outside the bird-breeding season (1 March–31 August inclusive) or as stipulated under the Wildlife Acts 1976 and 2000. The arborist shall carry out a post construction tree survey and assessment on the condition of the retained trees. A completion certificate is to be signed off by the arborist when all permitted development works are completed and in line with the recommendations of the tree report. The certificate shall be submitted to the planning authority upon completion of the works.

Reason: To ensure and give practical effect to the retention, protection and sustainability of trees during and after construction of the permitted development.

11. All service cables associated with the proposed development (such as electrical, telecommunications and communal television) shall be located underground. Ducting shall be provided by the developer to facilitate the provision of broadband infrastructure within the proposed development. All existing over ground cables crossing or bounding the site shall be relocated underground as part of the site development works, at the developer's expense.

Reason: In the interests of visual and residential amenity.

12. Proposals for the development name and apartment numbering scheme and associated signage shall be submitted to and agreed in writing with the planning authority prior to commencement of development. Thereafter, signs and numbers, shall be provided in accordance with the agreed scheme. No advertisements/marketing signage relating to the name of the development shall be erected until the developer has obtained the planning authority's written agreement to the proposed name.

Reason: In the interest of urban legibility, and to ensure the use of locally appropriate place names for new residential areas.

13. Site development and building works shall be carried out only between the hours of 0800 to 1900 Mondays to Fridays inclusive, between 0800 to 1400 hours on Saturdays and not at all on Sundays and public holidays. Deviation from these times will only be allowed in exceptional circumstances where prior written approval has been received from the planning authority.

Reason: In order to safeguard the residential amenities of property in the vicinity.

14. A minimum of 10% of all car parking spaces should be provided with EV charging stations/points, and ducting shall be provided for all remaining car parking spaces facilitating the installation of EV charging points/stations at a later date.

Reason: To provide for and/or future proof the development such as would facilitate the use of Electric Vehicles.

15. A plan containing details for the management of waste within the development, including the provision of facilities for the storage, separation and collection of the waste and, in particular, recyclable materials and for the ongoing operation of these facilities shall be submitted to, and agreed in

writing with, the planning authority prior to commencement of development. Thereafter, the waste shall be managed in accordance with the agreed plan.

Reason: In the interests of residential amenity and proper waste management.

16. Public lighting shall be provided in accordance with a scheme, details of which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. Such lighting shall be provided prior to the making available for occupation of any unit.

Reason: In the interests of residential amenity and public safety.

17. The developer shall facilitate the archaeological appraisal of the site and shall provide for the preservation, recording and protection of archaeological materials or features which may exist within the site. In this regard, the developer shall:

(a) notify the planning authority in writing at least four weeks prior to the commencement of any site operation (including hydrological and geotechnical investigations) relating to the proposed development, and

(b) employ a suitably-qualified archaeologist prior to the commencement of development. The archaeologist shall assess the site and monitor all site development works.

The assessment shall address the following issues:

- (i) the nature and location of archaeological material on the site, and
- (ii) the impact of the proposed development on such archaeological material.

A report, containing the results of the assessment, shall be submitted to the planning authority and, arising from this assessment, the developer shall agree in writing with the planning authority details regarding any further archaeological requirements (including, if necessary, archaeological excavation) prior to commencement of construction works.

In default of agreement on any of these requirements, the matter shall be referred to An Bord Pleanála for determination.

Reason: In order to conserve the archaeological heritage of the area and to secure the preservation (in-situ or by record) and protection of any archaeological remains that may exist within the site.

18. Prior to commencement of development, the applicant or other person with an interest in the land to which the application relates shall enter into an agreement in writing with the planning authority in relation to the provision of housing in accordance with the requirements of section 94(4) and Section 96(2) and (3) (Part V) of the Planning and Development Act 2000, as amended, unless an exemption certificate shall have been applied for and been granted under section 97 of the Act, as amended. Where such an agreement is not reached within eight weeks from the date of this order, the matter in dispute (other than a matter to which section 97(7) applies) may be referred by the planning authority or any other prospective party to the agreement to the Board for determination.

Reason: To comply with the requirements of Part V of the Planning and Development Act 2000, as amended, and of the housing strategy in the development plan for the area.

19. Prior to commencement of development, the developer shall lodge with the planning authority a cash deposit, a bond of an insurance company, or other security to secure the provision and satisfactory completion of roads, footpaths, watermains, drains, open space and other services required in connection with the development, coupled with an agreement empowering the local authority to apply such security or part thereof to the satisfactory completion of any part of the development. The form and amount of the security shall be as agreed between the planning authority and the developer

or, in default of agreement, shall be referred to An Bord Pleanála for determination.

Reason: To ensure the satisfactory completion of the development.

20. The developer shall pay to the planning authority a financial contribution in respect of public infrastructure and facilities benefiting development in the area of the planning authority that is provided or intended to be provided by or on behalf of the authority in accordance with the terms of the Development Contribution Scheme made under section 48 of the Planning and Development Act 2000, as amended. The contribution shall be paid prior to commencement of development or in such phased payments as the planning authority may facilitate and shall be subject to any applicable indexation provisions of the Scheme at the time of payment. Details of the application of the terms of the Scheme shall be agreed between the planning authority and the developer or, in default of such agreement, the matter shall be referred to An Bord Pleanála to determine the proper application of the terms of the Scheme.

Reason: It is a requirement of the Planning and Development Act 2000, as amended, that a condition requiring a contribution in accordance with the Development Contribution Scheme made under section 48 of the Act be applied to the permission.

21. The developer shall pay to the planning authority a financial contribution in respect of the extension of Luas Line B1 – Sandyford to Cherrywood' in accordance with the terms of the Supplementary Development Contribution Scheme made by the planning authority under section 49 of the Planning and Development Act 2000, as amended. The contribution shall be paid prior to commencement of development or in such phased payments as the planning authority may facilitate and shall be subject to any applicable indexation provisions (refer to SCSl Price Tender Index) of the Scheme at the time of payment. Details of the application of the terms of the Scheme shall be agreed between the planning authority and the developer or, in default of such

agreement, the matter shall be referred to An Bord Pleanála to determine the proper application of the terms of the Scheme.

Reason: It is a requirement of the Planning and Development Act 2000, as amended, that a condition requiring a contribution in accordance with the Supplementary Development Contribution Scheme made under section 49 of the Act be applied to the permission.

Siobhan Carroll
Planning Inspector

8th of October 2021

Chapter 4:

Archaeology & Cultural Heritage

4.0 ARCHAEOLOGY AND CULTURAL HERITAGE

4.1 INTRODUCTION

4.1.1 GENERAL

The following chapter details a pre-planning archaeological assessment undertaken for a proposed residential development at Golf Lane, Glenamuck Road in Carrickmines Great, Dublin 18 (Figure 4.1, ITM 721600, 723950). This assessment has been carried out to ascertain the potential impact of the proposed development on the archaeological and historical resource that may exist within the area. The assessment was undertaken by Maeve Tobin and Jacqui Anderson of IAC Archaeology.

The site partially lies within the zone of notification for Carrickmines Castle and associated features (DU026-005), a National Monument in local authority ownership. Archaeological testing was carried out within this part of site in 2007, although no archaeology was found at this time (Ministerial Consent C207, Registration No. E003332). Pre-planning consultation with the NMS noted that further testing should be carried out to inform this impact assessment; however, the current site conditions meant that this is not currently feasible (Figure 4.4). Detailed relating to all recorded monuments in the study area are included in Appendix 4.1.

The archaeological assessment involved a detailed study of the archaeological and historical background of the proposed development site and the surrounding area. This included information from the Record of Monuments and Places of County Dublin, the topographical files within the National Museum and all available cartographic and documentary sources for the area. A field inspection has also been carried out with the aim to identify any previously unrecorded features of archaeological or historical interest.

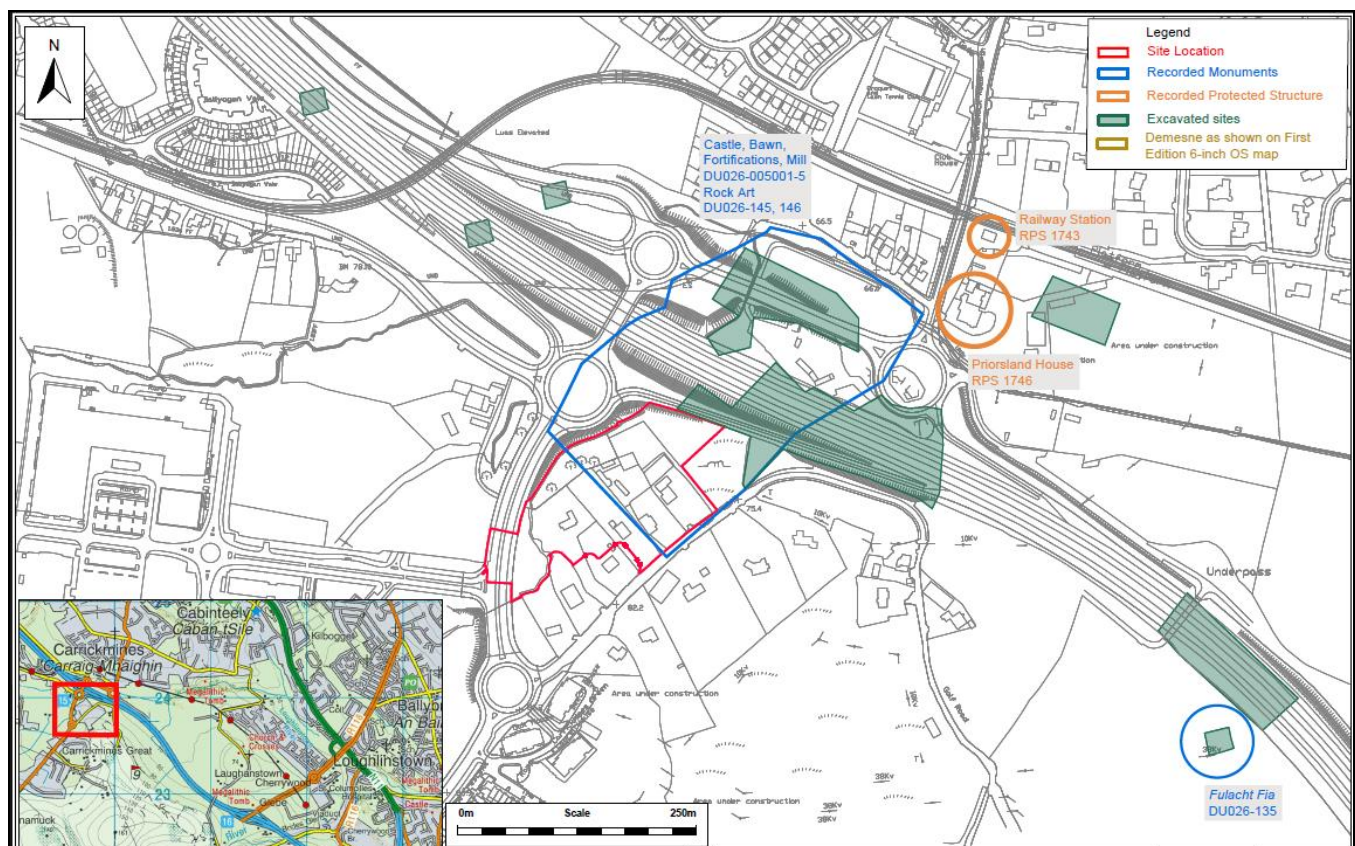


Figure 4.1 Site location showing recorded monuments and cultural heritage sites in the vicinity

4.1.2 IMPACT DEFINITIONS

Imperceptible An effect capable of measurement but without noticeable consequences.

Not significant An effect which causes noticeable changes in the character of the environment but without noticeable consequences.

Slight Effects An effect which causes noticeable changes in the character of the environment without affecting its sensitivities.

Moderate Effects An effect that alters the character of the environment in a manner that is consistent with existing and emerging trends.

Significant Effects An effect which, by its character, magnitude, duration or intensity alters a sensitive aspect of the environment.

Very Significant An effect which, by its character, magnitude, duration or intensity significantly alters the majority of a sensitive aspect of the environment.

Profound Effects An effect which obliterates sensitive characteristics.

Impacts as defined by the Draft EPA 2017 Guidelines (pg 42).

4.2 STUDY METHODOLOGY

Research for this chapter was undertaken in two phases. The first phase comprised a desk-top survey of all available archaeological, historical and cartographic sources. The second phase involved a field inspection of the site.

4.2.1 Desk-top Survey

- Record of Monuments and Places for County Dublin;
- Sites and Monuments Record for County Dublin;
- Monuments in State Care Database;
- Preservation Orders;
- Topographical files of the National Museum of Ireland;
- Cartographic and written sources relating to the assessment area;
- Dun Laoghaire Rathdown County Development Plan (2016–2022);
- Draft Carrickmines Conservation Plan (2015–2025);
- Cherrywood SDZ Planning Scheme (2014);
- Ballyogan and Environs Local Area Plan (2019–2025);
- Aerial photographs;
- Excavations Bulletin (1970–2019).

Record of Monuments and Places (RMP) is a list of archaeological sites known to the National Monuments Section, which are afforded legal protection under Section 12 of the 1994 National Monuments Act and are published as a record.

Sites and Monuments Record (SMR) holds documentary evidence and field inspections of all known archaeological sites and monuments. Some information is also held about archaeological sites and monuments whose precise location is not known e.g. only a site type and townland are recorded. These are known to the

National Monuments Section as 'un-located sites' and cannot be afforded legal protection due to lack of locational information. As a result, these are omitted from the Record of Monuments and Places. SMR sites are also listed on a website maintained by the Department of Culture Heritage, and the Gaeltacht (DoCHG) – www.archaeology.ie.

National Monuments in State Care Database is a list of all the National Monuments in State guardianship or ownership. Each is assigned a National Monument number whether in guardianship or ownership and has a brief description of the remains of each Monument. The remains of Carrickmines Castle (DU026-005001-5), situated c. 80m to the east of the application site, is a National Monument in local authority ownership.

The Minister for DoCHG may acquire national monuments by agreement or by compulsory order. The state or local authority may assume guardianship of any national monument (other than dwellings). The owners of national monuments (other than dwellings) may also appoint the Minister or the local authority as guardian of that monument if the state or local authority agrees. Once the site is in ownership or guardianship of the state, it may not be interfered with without the written consent of the Minister.

Preservation Orders List contains information on Preservation Orders and/or Temporary Preservation Orders, which have been assigned to a site or sites. Sites deemed to be in danger of injury or destruction can be allocated Preservation Orders under the 1930 Act. Preservation Orders make any interference with the site illegal. Temporary Preservation Orders can be attached under the 1954 Act. These perform the same function as a Preservation Order but have a time limit of six months, after which the situation must be reviewed. Work may only be undertaken on or in the vicinity of sites under Preservation Orders with the written consent, and at the discretion, of the Minister.

Topographical files of the National Museum of Ireland is the national archive of all known finds recorded by the National Museum. This archive relates primarily to artefacts but also includes references to monuments and unique records of previous excavations. The find spots of artefacts are important sources of information on the discovery of sites of archaeological significance. Cartographic sources are important in tracing land use development within the development area as well as providing important topographical information on areas of archaeological potential and the development of buildings.

Cartographic analysis of all relevant maps has been made to identify any topographical anomalies or structures that no longer remain within the landscape.

- Sir William Petty, Down Survey Map, 1654–56, Barony of Rathdown
- John Rocque's Exact survey of the city and suburbs of Dublin, 1760
- John Taylor's Map of the Environs of Dublin, 1816
- Ordnance Survey Maps of County Dublin (1837, 1871, 1909)

Documentary sources were consulted to gain background information on the archaeological and cultural heritage landscape of the proposed development area.

Development Plans contain a catalogue of all the Protected Structures and archaeological sites within the county. The Dun Laoghaire Rathdown Development Plan (2016–2022), Ballyogan and Environs Local Area Plan (2019–2025) and the Cherrywood Development Plan (2014) were consulted to obtain information on cultural heritage sites in and within the immediate vicinity of the proposed development area. This included a review of the relevant Environmental reports and Strategic Environmental Assessments (SEA). The application site is situated outside of the Cherrywood SDZ, which extends southeast from Golf Lane.

The Draft Carrickmines Castle Conservation Plan (2015–2025) sets out a framework for the conservation and management of the site of Carrickmines Castle. This was adopted by DLR in 2017.

Aerial photographic coverage and Satellite Imagery is an important source of information regarding the precise location of sites and their extent. It also provides initial information on the terrain and its likely potential for archaeology. A number of sources were consulted including aerial photographs held by the Ordnance Survey and Google Earth.

Excavations Bulletin is a summary publication that has been produced every year since 1970. This summarises every archaeological excavation that has taken place in Ireland during that year up until 2010 and since 1987 has been edited by Isabel Bennett. This information is vital when examining the archaeological content of any area, which may not have been recorded under the SMR and RMP files. This information is also available online (www.excavations.ie) from 1970-2019.

4.2.2 Field Inspection

Field inspection is necessary to determine the extent and nature of archaeological and historical remains, and can also lead to the identification of previously unrecorded or suspected sites and portable finds through topographical observation and local information.

The archaeological field inspection entailed -

- Walking the proposed development and its immediate environs.
- Noting and recording the terrain type and land usage.
- Noting and recording the presence of features of archaeological or historical significance.
- Verifying the extent and condition of any recorded sites.
- Visually investigating any suspect landscape anomalies to determine the possibility of their being anthropogenic in origin

4.3 THE EXISTING RECEIVING ENVIRONMENT (BASELINE SITUATION)

4.3.1 Archaeological and Historical Background

The application site comprises a large area (c. 2.6ha) of heavily overgrown land bound to the north and east by the M50, to the west by the Glenamuck Road and to the south by Golf Lane (formerly Glenamuck Road). It is situated in the townland of Carrickmines Great, Parish of Tully and Barony of Rathdown in Dublin 18 (Figure 4.1). The development area is located within a rich archaeological landscape, our knowledge of which has been augmented by recent archaeological excavations.

The site partially lies within the zone of notification for National Monument Carrickmines Castle and associated features DU026-005. The name Carrickmines may derive from 'Carraig-Maighin' meaning 'little plain of rocks' (Clinton and Shiels 2013). Investigations in advance of the M50 construction led to what has been described as one of the most important excavation of a medieval settlement landscape in Ireland. The excavations extended to the western perimeter of the motorway footprint (Figure 4.1) within the immediate vicinity of the current site. The core remains are however preserved in-situ between the motorway and slip road to the north c. 80m from the application site. Archaeological testing was carried out in the part of the application site within the zone of notification for the castle in 2007 although no archaeology was found at this time (Ministerial Consent C207, Registration No. E003332).

4.3.2 Prehistoric Period

This area was a prime location for settlement during the Prehistoric period, situated within the coastal plains, adjacent to a water source, with good visual corridors west to the hills and east to the coast. Although some Mesolithic stone tools have been recorded from the surrounding lands the first conclusive evidence for continued settlement in the wider area dates from the Neolithic period onwards.

Neolithic Period (4000–2500 BC)

Numerous megalithic tombs are recorded in the wider landscape, including Neolithic Portal tombs, which are the most prevalent in this region. Two examples are located in the wider vicinity of the proposed development area, at Brennanstown (DU026-007) c. 1.16km east and Kiltiernan demesne (DU026-019) c. 2.2km west. The Kiltiernan dolmen, known as Giant's Grave was partly investigated during the 1950s by the Board of Works at this point some sherds of Neolithic coarseware pottery, three flint hollow scrapers and two flint arrowheads were found.

The remains of Neolithic habitation features were identified during excavations at Carrickmines Great within the M50 footprint to the east of the application area (Ó Drisceoil 2013). Stray finds of polished stone axes and Neolithic flints are recorded from the wider area. A large pit containing early Neolithic waste overlying nine water-rolled pebble beads was recorded c. 500m to the southeast (ibid.). Excavations in advance of a housing development (Belarmine) at Kilgobbin c. 2km to the northwest revealed an early Neolithic house and associated pits associated with 26 early Neolithic vessels (Hagan 2013). Excavations in Laughanstown and Glebe 1.9km to the southeast and 1.8km to the south-southeast identified significant Neolithic burial and settlement evidence (Seaver 2004).

Bronze Age (2500–500 BC)

The megalithic tomb tradition extended into the Bronze Age with Wedge Tombs recorded as being in use at the start of this period. Examples are located at Laughanstown (DU026-024, Nat. Mon. 2016) and Ballyedmonduff (DU025-045) c. 1.9km south-southeast and 3.9km southwest respectively. Extensive evidence for Bronze Age burial and settlement activity has also been recorded from the wider area around Carrickmines Great, Jamestown, Laughanstown, Cherrywood, Glebe, and Kilgobbin (Seaver 2013; McQuade 2013; Ó Drisceoil 2013 and Hagen 2013). The nearest evidence for settlement comprises the early and late Bronze Age hut structures excavated c. 500m to the southeast at Carrickmines Great (Ó Drisceoil 2013). A large quantity of flints were recovered from these sites. Several fulachtaí fia, have been identified c. 550m southeast at Carrickmines Great (DU026-135) and 800m east at Brennanstown (Whitty, McIlreavy and Kavanagh 2018, Licence Ref.: 15E0471) which are likely to date to this period. A bronze palstave axehead is recorded as a stray find from Glenamuck South (NMI Ref.: 1974:89).

Megalithic rock art, cup-marked granite boulders (DU026-145 and DU026-144) were identified during groundworks associated with the M50 in Carrickmines Great and Laughanstown respectively. These stones are to be relocated to Cabinteely Park for public accessibility.

Evidence for burial at this time is wide spread in this locale with a Bronze Age cist burial (DU026-015) discovered in 1926 during quarrying in Jamestown c. 1.4km west. Excavation in advance of a golf course revealed further Bronze Age features in the adjacent field (Kyle 2012; Licence Ref.: 11E0085) and the NMI Topographical Files note stray finds of human bone and pottery sherds in the Jamestown area (NMI 1957:126–9, 1929: 1290). Further northwest evidence for an extensive prehistoric landscape have been identified in Kilgobbin including an urn burial (DU026-123). The presence of a mixture of finds from different periods in some of these features is significant in that it is representative of an intensive, multi-phased, prehistoric environment (Hagen 2013). These excavations included a Beaker enclosure, a Beaker hut site, Beaker pits, a Bronze Age burial complex with associated stakeholes, comprising two cremation burials and middle–late Bronze Age pottery.

A substantial Bronze Age cemetery was excavated at Laughanstown and an early Bronze Age cremation burial accompanied by an urn, a copper alloy pin and some burnt flint was identified and excavated 2km south-southeast and southeast at Laughanstown (Seaver 2013, McQuade 2003a; McQuade 2003b). A ring barrow (DU026-133), cremation burial and the remains of a roundhouse were also excavated further away at Cherrywood (O'Neill 1998).

Iron Age (c. 500 BC to AD 400)

There is a growing corpus of evidence for Iron Age activity in the wider vicinity of the application site. Settlement features have been recorded during excavations at Carrickmines Great, Jamestown, Laughanstown, and

Kilgobbin. Iron Age hut sites were excavated at Kilgobbin (Hagen 2013) and at Carrickmines Great (Ó Drisceoil 2013; Ó Drisceoil and Devine 2012). The early Iron Age habitation site at Carrickmines Great appeared to be a small undefended farmstead represented by a post-built circular house associated with iron-smelting furnace, charcoal-production features and cultivation of cereals (ibid.). At this time the surrounding landscape has been characterised as woodland with oak, alder, hazel, ash and apple trees in the vicinity. The application site is shown in the early modern historic mapping (Figure 4.3) as marginal scrubland.

A late Iron Age cremation burial pit was also recorded in the northern limit of the Carrickmines Great excavation area c. 50m north of the 'farmstead' discussed above (ibid.). Further evidence for Iron Age burial was identified as a cremation deposit within a ringditch excavated at Jamestown (Kyle 2012). A copper-alloy ring retrieved from this ringditch has been interpreted as a finger ring, a chain link, or part of a composite bracelet or necklace (ibid.).

4.3.3 Early Medieval Period

The territory around Carrickmines was ruled by the Lordship of the Uí Briúin Cualann. The Rathdown area was well-populated during this period with a large number of ecclesiastical centres established in the area (Rathmichael, Tully, Shankill and Kilternan) and close proximity to the coastal resource. It is therefore surprising that there is not greater evidence for settlement in the form of ringforts within the area. It is possible that there was no need for a large number of defended settlements within the area as Rathdown was out of reach of the constant attention of the Kings of Meath to the north of Dublin city and the Kings of Leinster to the west of the Wicklow Mountains. It is also possible that many of the sites were removed during the medieval period, when the arrival of the Anglo-Normans and their new techniques of warfare rendered the ringfort obsolete (Corlett 1999, 53).

Excavations have revealed a significant early medieval Hiberno-Norse settlement and burial site at Cherrywood (O'Neill 2000) and a secular settlement site (ringfort DU026-149) at Glebe 2.1–2.5km to the southeast (Corlett 2013). Tully Church, graveyard, crosses and ecclesiastical enclosure (DU026-023001–19, Nat. Mon. 225) located 1.6km southeast are situated on a natural prominence overlooking the coastal plains. Tully, which is thought to have been founded in the eighth century (Corlett 2013) gained much power and influence and it has been suggested (Potterton 2010, 67) that the site was a strategic holding of the church. The distribution of Rathdown slabs, including those at Tully Church, within this wider region appear to indicate additional evidence for the spread of Scandinavian settlement activity. A substantial cemetery founded in the early medieval period was also identified c. 2km to the east at Cabinteely (DU026-119).

4.3.4 Medieval Period

The arrival of the Anglo Normans and ensuing social upheaval led to the significant changes in land ownership and settlement. Much of Rathdown was granted to Walter de Ridelesford, however it appears that Henry II took back some of these lands though as he wanted to keep much of Dublin and its surroundings to himself. A large part of Rathdown then became part of the royal estate of O'brun. This estate included parts of Ballycorus, Kilternan, Powerscourt and Corke, near Bray (Murphy and Potterton 2010, 85). The greatest landowner within the region under the Norman regime was the Archbishop of Dublin, who retained those lands owned since before the invasion, including Dalkey, Rathmichael and Shankill.

There are a large number of fortified buildings within the Rathdown area and this was in part due to the presence of the Pale. The Pale was defined as a hinterland around the centre of Anglo-Norman rule based in Dublin. Carrickmines lay at the junction of two medieval roads, leading north to Dublin and east to Laughanstown/ coast (Clinton and Shiels 2013, 137). Excavations to the immediate east of the application site in advance of the M50 revealed three conjoined enclosures representing occupation from the late 12th century into the modern period (ibid.). It is likely, based on historical and archaeological records, that a small manor (including a stone-lined cereal-drying kiln) containing arable and pastoral land was present at Carrickmines from the mid-late 12th century (Bolton 2016, 112). In the following decades a horizontal watermill, workshop containing three furnaces or kilns, and an additional structure were built. In the early 13th century, the excavators have identified a moated

enclosure surrounding the manor, representing the first evidence for fortification at Carrickmines. This 'north enclosure' was situated c. 100m northeast of the application site. Later extensions of the enclosures, the 'southwest enclosure' and 'southeast enclosure' extend westwards to the immediate east of the application site (Figure 4.2). The southwest enclosure ditch enclosed a polygonal area (100m by 85m) and was 3.3–3.5m wide and c. 1.5m deep (ibid., 13). A significant number of artefacts (c. 90,000) were recovered during excavation at Carrickmines, including a vast number of locally produced ceramics and metalwork (Clinton and Shiels 2013, 138)

Carrickmines manor was situated on the frontier of Anglo-Norman and Gaelic-Irish land holdings and during the 14th and 15th centuries their interaction was characterised by interspersed violence. The site acted as a military base to defend the region from raiding by the O' Byrnes and the O' Tooles. Bolton (Bolton 2016, 114) describes the status of Carrickmines in the mid-14th century as a 'Ward' with military functions but not necessarily a defensive structure. The most defensive feature identified during excavation, the trivallate 'southeast enclosure' appears to have been constructed at this time, representing an attempt to strengthen the manor. Situated c. 100m to the east of the application site the innermost ditch was revetted with granite walling. A two-phased tower was identified at the northeast terminus of the inner ditch.

During the 15th century the 'Subsidised Castles Act' provided grants of ten pounds to encourage the construction of castles to defend the Pale against the native Irish. In 1400 Carrickmines passed to the Walsh family although Bolton (ibid. 116) notes that they were not great castle builders, and the presence of a 'castle' here remains speculative. In 1494 an act of Parliament required landowners to construct a line of defences along the border of the Pale, but it is likely that not all did so. Evidence for boundary of The Pale ditch has also been identified during numerous investigations c. 800m northwest (DU026-115) and 600m south (DU026-122) of the application site. The Pale fortifications would have led from Kilgobbin Castle to Carrickmines, although the exact alignment of the ditch, with respect to the current site is not known.

4.3.5 Post medieval Period

The Walsh's of Carrickmines continued to rise in power and affluence although this came to an abrupt conclusion in the mid-17th century with the eruption of the Irish Confederate War in 1641. During the 17th century rebellious activity took its effect on the landscape, especially in the neighbouring townlands of Carrickmines and Loughlinstown. The enclosure at Carrickmines acted as a base for the confederate forces in 1641 however the most significant historic event recorded at Carrickmines was its siege in March 1642. Excavations revealed two multiple graves (or mass graves) containing the remains of 15 individuals, including men, women and children (Clinton, Fibiger and Shiels 2013). The bodies appeared to be hastily buried in a non-Christian manner and several of the skeletons displayed evidence for unhealed blade trauma representative of interpersonal violence at their time of death. There is potential for remains of massacre burials to continue east within the portion of land preserved around the farmhouse (ibid. 149). Evidence for the siege was also represented by c. 30 musket balls and an impacted cannonball, their location suggesting incoming fire from the Dublin side of the Glenamuck Stream (ibid.).

By the 18th century, even with the turmoil of the English civil war and arrival of Cromwell in Ireland, the population of southeast Dublin and northeast Wicklow prospered. The house at Carrickmines was occupied by the Mooney Family at the turn of the 18th century (Clinton and Shiels 2013) and they continued on here until the 21st century. A significant 18th century military camp (DU026-127) was established in Laughanstown and Cherrywood townlands as a result of the Napoleonic threat c. 1.5km to the east. John Ferrars (1796), who drew the camp in 1796, described the 'tents of canvas, wooden taverns, wooden huts and buildings of brick'. Numerous programmes of investigation have indicated that the camp was heavily truncated and disturbed following closure, by centuries of agricultural activity and the construction of the railway. Middens of domestic waste and scattered finds of militaria in the topsoil are the main indicators of the camp occupation. Monitoring of topsoil stripping in 2003 exposed the remains of a military kitchen 2km southeast of the application site (McQuade 2003a; McQuade 2003c). The remains of a second military kitchen were discovered 400m to the north of this during recent testing (McIlreavy and Tobin 2016). Military buttons, musket shot, clay pipe, glass bottles, tokens and a range of 18th

century artefacts have been retrieved from the topsoil and plough zone as distant as the footprint of the M50 suggesting that the surrounding fields were used for manoeuvres.

The branch of the Dublin & South Eastern Railway was constructed running south from Harcourt Street Station to Bray in the mid-19th century. The route of the former railway line runs 290m to the east of application site within the approximate footprint of the current Luas line.

4.3.6 Summary of Previous Archaeological Fieldwork

A review of the Excavations Bulletin (1970–2019) revealed that a significant number of archaeological investigations, including geophysical survey, testing, monitoring and excavation, have been carried out in advance of the M50, Luas and other developments in the Carrickmines area. The most significant of these comprise the two-year excavation at Carrickmines Castle to the immediate east of the application site carried out by Mark Clinton (Clinton and Shiels 2013). The results of this excavation and other nearby works have been summarised above and shown on Figure 4.1. In summary, the excavations revealed 13th and 14th century fortified enclosures extending to the western perimeter of the M50 footprint (Figure 4.2).

Previous testing undertaken within the eastern half of the application site, to investigate the potential for medieval settlement features extending within the site boundary, did not reveal any archaeology (Moriarty 2007, Ministerial Consent C207, and Registration No. E003332). This is likely due to the fact that the site is shown on the first edition six-inch OS map and 25-inch OS map (Figure 4.3) as marginal scrubland or waterlogged terrain. Trenches 1–4, located nearest to the excavation site boundary in a former paddock, revealed an average depth of topsoil as 0.3m and a significant quantity of granite boulders in the subsoil (Figure 4.2). Some modern disturbance was noted in Trench 1, comprising a pit containing modern builders' rubble. Trench 4, situated in the western limit of the paddocks was excavated to a depth of +1.1m and indicated a deep deposit of modern dumped material (containing modern building rubble and iron and plastic waste). The excavator concluded that the test area had been subject to a level of modern disturbance associated with the construction of the houses, stables and paddocks; however, there was potential for previously unrecorded archaeological features to exist outside of the tested area. It was recommended that the area be subject to monitoring of ground works during construction (ibid., 13).

4.3.7 Cartographic Analysis

William Petty's Down Survey Map of The Barony of Rathdown, C. 1650

This map, though not accurately scaled, shows a large castle and houses to the immediate east at 'Carrickmaine'. The Glenamuck Stream is shown running along the southern perimeter of these features.

John Rocque's Map of the City and County of Dublin, 1760 (Figure 4.3)

This map shows the main topographical details and chief residences in the County of Dublin on an almost accurate scale. The application site is shown within rectangular enclosed fields to the west of Carrickmines. The house at Carrickmines is shown as a large U-shaped structure with outbuildings and sheds to the rear (west). The Glenamuck Stream is shown flowing from the northwest along the north of the settlement and continuing eastwards towards Brenanstown. There are no structures or features of archaeological potential illustrated within the application area.

John Taylor's Map of the Environs of Dublin 1816 (Figure 4.3)

This map presents a more accurate illustration of the topographical features and infrastructure of the surrounding landscape. The application site is shown to the immediate north of the newly constructed Glenamuck Road, which leads from Golden Ball in the southwest to Carrickmines in the northeast. The route of a watercourse, tributary to the Glenamuck Stream, is shown passing through the site.

First Edition Ordnance Survey Map, 1837, scale 1:10,560 (Figure 4.3)

This is the first accurate historic mapping coverage of the area containing the proposed development. By this time the application site is shown as marshy marginal scrubland to the immediate north of the Glenamuck Road. This patch of land is bordered by the watercourse noted above. For the first time the 'site of Castle' is annotated at Carrickmines, adjacent to the farmhouse. A small walled garden or orchard is shown to the west of the farmyard. There is no indication of the underlying enclosures or fortifications. There are no structures or features of archaeological potential shown within the application site.

Second Edition Ordnance Survey Map, 1871, scale 1:10,560

There are no changes to the mapping within the application site, although the key for site is now indicating cropping rock and marginal land.

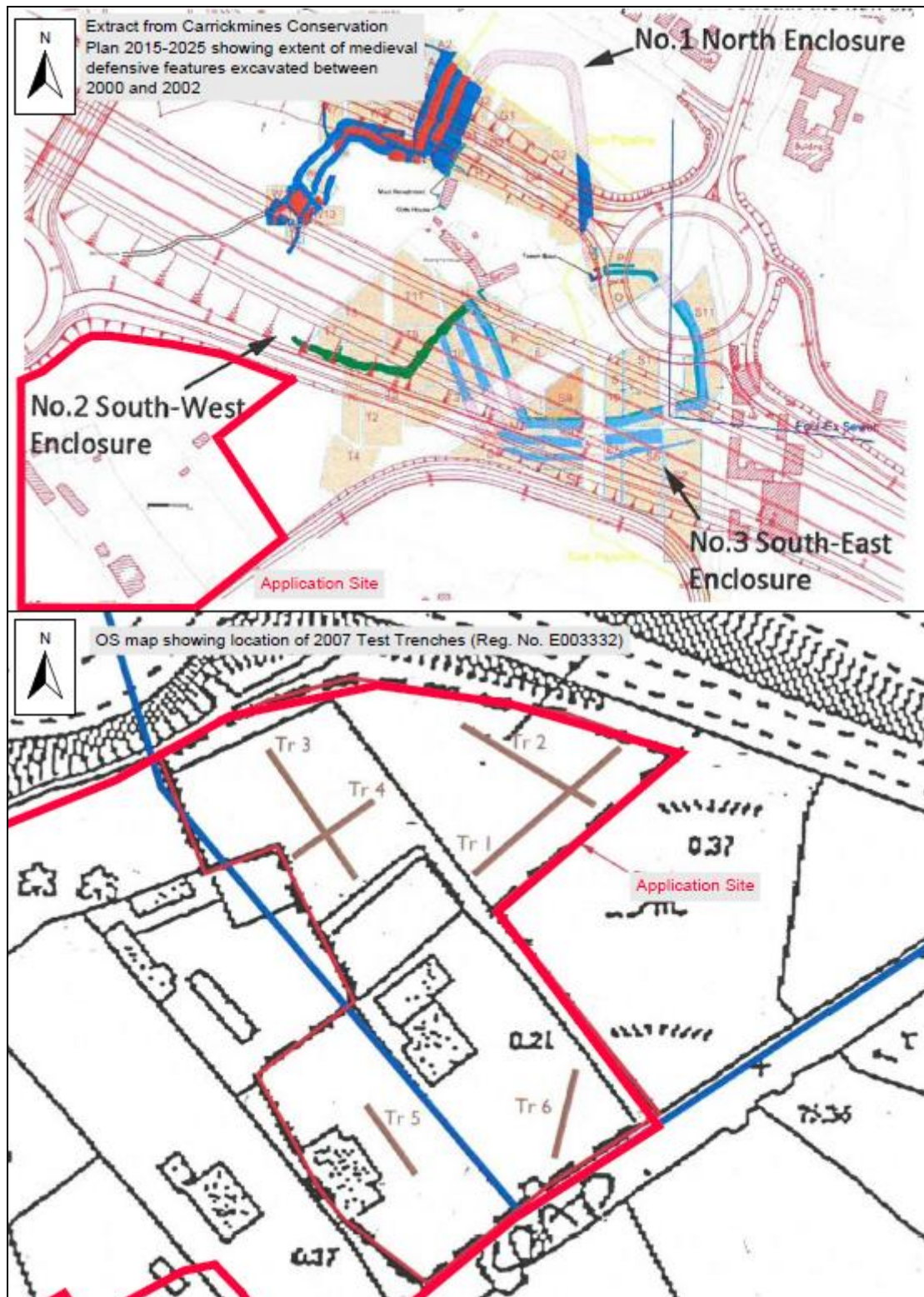


Figure 4.2: Previous Archaeological Investigations

Ordnance Survey Map, 1909, scale 1:2,500 (Figure 4.3)

The later mapping indicates that some land improvement has been carried out in the area with enclosure of fields around. A house has been constructed to the southwest of the application area however, with the exception of the watercourse, there are no other features of note. The site of the castle is marked c. 200m to the northeast in the farmyard. Elements of Carrickmines village have developed following the arrival of the Railway, c. 300m to the northeast.

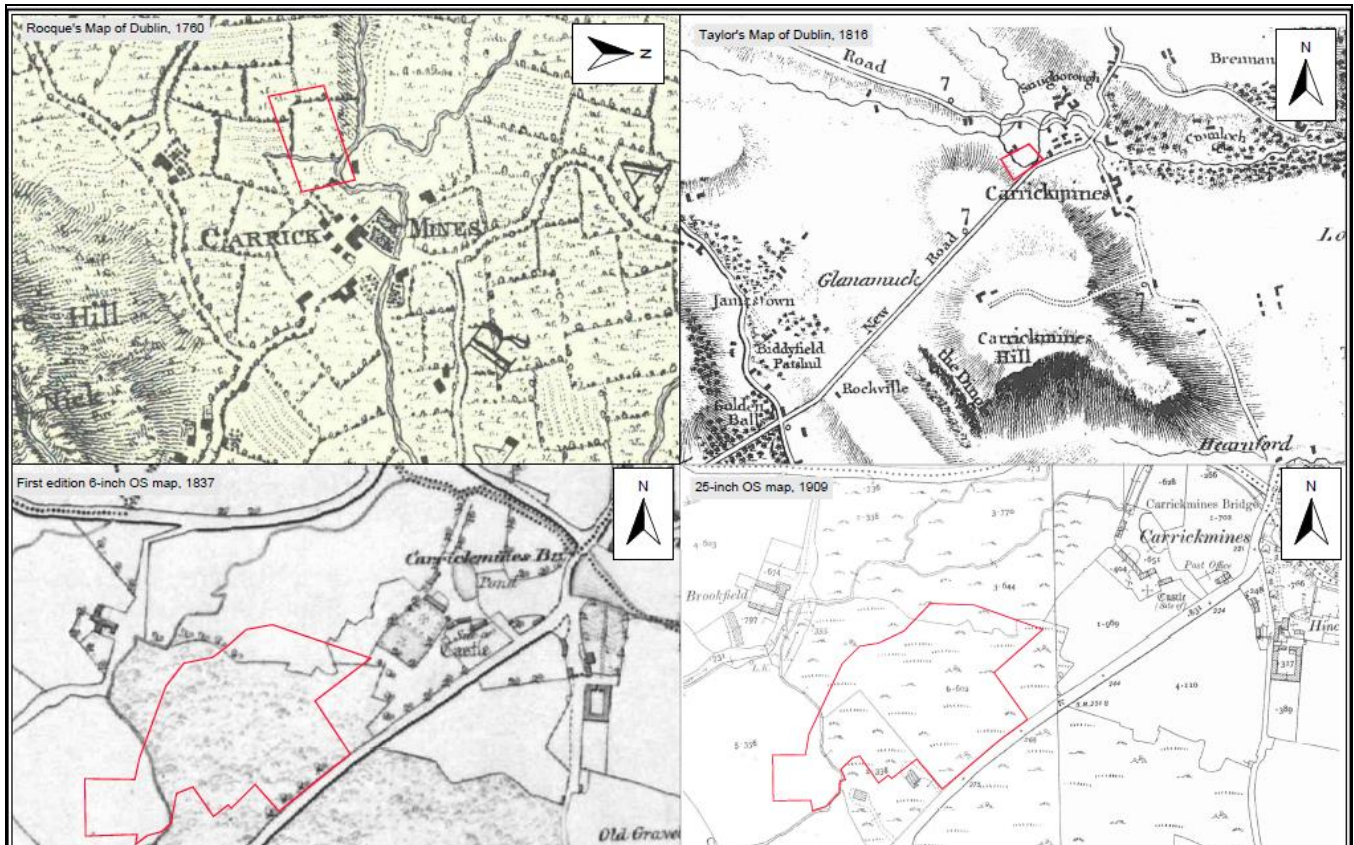


Figure 4.3: Extracts from historic maps (c. 1760-1909) showing the approximate location of the application site

4.3.8 County Development Plan

The DLR County Development Plan 2016–2022, Ballyogan and Environs Local Area Plan (2019–2025) and the Cherrywood Planning Scheme (2014), along with the relevant SEAs, detail all of the Recorded Monuments within the vicinity of the study area (Appendix 4.2). The site partially lies within the zone of notification for Carrickmines Castle and associated features DU026-005001–5, a National Monument in local authority ownership. The significance of this site is listed in within all the relevant plans and associated SEAs.

Extensive excavations carried out between 2000 and 2002 to the immediate northeast of the application site boundary revealed significant archaeological remains relating to the medieval manor, water mill and fortifications at Carrickmines. Testing within the eastern section of the proposed development area has failed to identify any archaeological remains associated with the medieval settlement of Carrickmines.

It is noted that Policy BELAP A1 of the Ballyogan and Environment LAP, that geophysical survey should form part of an archaeological assessment for a site adjacent to a site of archaeological significance or recorded monument. It should be noted that geophysical survey is only effective as an archaeological survey technique in lands that have not been subject to disturbance. Given the level of development and disturbance within the proposed development area, it would not be possible to carry out a geophysical survey that would produce any meaningful results.

4.3.9 The Carrickmines Castle Conservation Plan

The Carrickmines Castle Conservation Plan (2015–2025) which was adopted by DLR in 2017 states the significance of the Carrickmines site and discusses policies for its future (Appendix 4.2). The plan identifies the

significance of the site in respect of the following items: a) Defending the marches of the Pale, B) insight into rural medieval life, C) 1642 siege, D) its legacy of controversy, and E) its preservation within the M50 island. The six policies set out in the plan focus on continued preservation in-situ of the remains and maintenance of the buildings and vegetation levels to provide safe access.

4.3.10 Aerial Photographic Analysis & Satellite Imagery

A review of the aerial photographic coverage (1995–2019) confirmed that the area has been partly built up with residential houses, stables and paddocks during the 20th century. The grounds are mature gardens, which have grown significantly overgrown in the last decade. Demolition of the houses is evident in c. 2013 (Plate 4.1) with mounds of demolition rubble present across the site. Some of this was stored in the northeast quadrant of site, within the area that was previously identified as being artificially built up in 2007. A review of survey results from a decade ago now indicates that c. 1–2.25m of imported materials have been spread across this area (shown in Figure 4.4).

4.3.11 Topographical Files

Information on artefact finds from the study area in County Dublin has been recorded by the National Museum of Ireland since the late 18th century. Location information relating to these finds is important in establishing prehistoric and historic activity in the study area.

A significant quantity of artefactual material (c. 90,000 artefacts) was recovered during the archaeological excavations and has been accessioned to the National Museum of Ireland and is held in their repository in Swords, Co. Dublin. These includes pottery (c. 20,000 sherds), coins, weapons and ammunition, human skeletal remains, metal, glass, wood, leather and clay artefacts.

Table 4.1: Stray finds from the vicinity of the proposed development area

Townland, Parish & Barony	NMI No.	Find	Find Place	Description
Laughanstown Tully, Rathdown	1975:247	Medieval pottery	Vicinity of Tully Church	Base wall sherds, medieval pottery. Fairly coarse, hard, micaceous and quarzitic ware.
	1981:10	Medieval pottery	Vicinity of Tully Church	Body sherd of glazed vessel. Orange fabric with abraded pale green external glaze.
	1999:132	Medieval pottery	Vicinity of Tully Church	Five sherds of medieval pottery, consisting of 3 sherds of unglazed Leinster Cooking Ware and two sherds of glazed ware.
	1989:18	Bronze strap end, Various post-1790 items	Field walking over site of the military camp	Strap end of copper alloy. Possible 10th century with decoration. Finds recovered during. The finds have all be categorised as AD 1790 or later. Uniform buttons including military, livery, dress and railway examples. Some brass pieces from muskets and bugles. Bronze and copper military badges including both Irish and English regimental crests. Lead musket and pistol shot varying from 10–17mm. A variety of coins dating from 1792 onwards. A toy lead horse and bronze cannon. A bronze rosary crucifix.
Glenamuck North, Tully, Rathdown	1974:89	Bronze Palstave	Found in a field 18" deep.	Bronze Palstave cast in a bi-valve mould. It is heavily patinated and extremely pitted all over. L 13.5cm, W butt 2.8cm. cutting edge 5.8cm



Plate 4.1: Satellite image (Google Earth 2013) showing application site



Figure 4.4: Extract from Google Earth (May 2017) showing application site

4.3.12 Cultural Heritage Background

Toponymy of Townlands

Townland and topographic names are an invaluable source of information on topography, land ownership and land use within the landscape. They also provide information on history; archaeological monuments and folklore of an area. A place name may refer to a long-forgotten site, and may indicate the possibility that the remains of certain sites may still survive below the ground surface. The Ordnance Survey surveyors wrote down townland

names in the 1830's and 1840's, when the entire country was mapped for the first time. Some of the townland names in the study area are of Irish origin and through time have been anglicised. The main reference used for the place name analysis is *Irish Local Names Explained* by P.W Joyce (1870) and logainm.ie. A description and possible explanation of each townland name in the environs of the proposed development area are provided in the below table.

Table 4.2: Local townlands

Placename	Derivation	Possible Meaning
Carrickmines	<i>Carriag Maigin</i>	Rock of the little plain
Jamestown	-	-
Ballyogan	<i>Baile Ui Ogain</i>	O' Hogan's town/homestead
Brennanstown	-	-

Townland boundaries

The townland is an Irish land unit of considerable longevity as many of the units are likely to represent much earlier land divisions. However, the term townland was not used to denote a unit of land until the Civil Survey of 1654. It bears no relation to the modern word 'town' but like the Irish word *baile* refers to a place. It is possible that the word is derived from the Old English *tun* land and meant 'the land forming an estate or manor' (Culleton 1999, 174).

Gaelic land ownership required a clear definition of the territories held by each sept and a need for strong, permanent fences around their territories. It is possible that boundaries following ridge tops, streams or bog are more likely to be older in date than those composed of straight lines (ibid. 179).

The vast majority of townlands are referred to in the 17th century, when land documentation records begin. Many of the townlands are mapped within the Down Survey of the 1650s, so called as all measurements were carefully 'laid downe' on paper at a scale of forty perches to one inch. Therefore, most are in the context of pre-17th century landscape organisation (McErlean 1983, 315).

In the 19th century, some demesnes, deer parks or large farms were given townland status during the Ordnance Survey and some imprecise townland boundaries in areas such as bogs or lakes, were given more precise definition (ibid.). Larger tracks of land were divided into a number of townlands, and named Upper, Middle or Lower, as well as Beg and More (small and large) and north, east, south and west (Culleton 1999, 179). By the time the first Ordnance Survey had been completed a total of 62,000 townlands were recorded in Ireland.

Although not usually recorded as archaeological monuments in their own right, townland boundaries are important as cultural heritage features as they have indicated the extents of the smallest land division unit in the country—the townland—which have been mapped since the 19th century. It remains unclear how old these land units actually are, though it has been convincingly argued that they date to at least the medieval period and may be significantly older than this (McErlean 1983; MacCotter 2008).

The proposed development area is located within the townland of Carrickmines Great, however, there are no townland boundaries within the application site.

Cultural heritage sites

The term 'cultural heritage' can be used as an over-arching term that can be applied to both archaeology and architectural heritage. However, it also refers to more ephemeral aspects of the environment, which are often recorded in folk law or tradition or possibly date to a more recent period. No specific cultural heritage sites have been identified during the course of this assessment that relate to the proposed development area; however, the archaeological sites within the study area identified in Sections 3.4.1 to 3.4.11 should also be considered as cultural heritage.

4.3.13 Field Inspection

During the course of the field investigation, undertaken in July 2018, the study area and its surrounding environs were inspected for known or previously unknown sites of archaeological and cultural heritage interest.

The site is bound on all perimeters by high wooden hoarding (Plates 4.2 and 4.3). The northwest perimeter is formed by an overgrown grassed verge (Plate 4.4). Access to the interior was attempted from the southern perimeter on Golf Lane (formerly Glenamuck Road). The site was found to be significantly overgrown with areas of demolition rubble and fallen trees blocking ingress to the northern portion of site (Plates 4.5-4.8). The mature trees bordering the former property plots were notable and the former boundary walls were notable in part.

The level of dense vegetation cover (Figure 4.4) hindered any valuable inspection of the site in terms of identifying features of archaeological potential.



Plate 4.2: Hoarding along southern perimeter



Plate 4.3: Fencing along western perimeter



Plate 4.4: Dense vegetation within northern perimeter of site



Plate 4.5: Demolition debris and mature overgrowth within south of site



Plate 4.6: Remains of former buildings present in southeast quadrant



Plate 4.7: Mature trees lining former property boundaries



Plate 4.8: Fallen trees and dense overgrowth

4.3.14 Conclusions

The eastern half of the application site is situated within the zone of notification for Carrickmines Castle and associated features (DU026-005001–5), a National Monument in local authority ownership. Excavations undertaken in advance of the M50 construction revealed a significant medieval landscape including fortifications (banks and ditches), water mill, house sites, industrial features and the castle entrance; located immediately east of the current site boundary. Evidence for prehistoric occupation in the Neolithic, Bronze Age and Iron Age have also been identified through excavation within the footprint of the M50 within c. 500m of the application site.

Clinton and Shiels (2013) suggested that further structures associated with the medieval occupation of Carrickmines are almost certainly to be found beyond the limits of the M50 excavations, especially to the south and east. Previous testing undertaken within the eastern half of the application site to investigate the potential for medieval settlement features extending within the site boundary did not reveal any archaeology. This is likely due to the fact that the site is shown on the first edition six-inch OS map and 25-inch OS map (Figure 4.3) as marginal scrubland or waterlogged terrain.

Since 2007 several dwellings have been demolished within the application site and the lands have become substantially overgrown and inaccessible. The aerial imagery from 2013 and 2017 show the locations of

demolition rubble and indicate the level of overgrowth covering the site today. The northeast quadrant, comprising the former paddocks, has been built-up by c. 1–2.25m of imported modern demolition debris. This is in addition to the modern material previously noted during the 2007 programme of testing.

No specific cultural heritage sites have been identified within the proposed development area or its immediate environs.

4.4 CHARACTERISTICS OF THE PROPOSED DEVELOPMENT

The proposed development comprises a residential development of 482 no. units (all apartments), along with ancillary residential amenities, and provision of a childcare facility, gym, and local shop. The proposed residential units comprise 31 no. studio units, 183 no. 1-bedroom units, 229 no. 2-bedroom units, and 39 no. 3-bedroom units (including 2 no. duplex type units).

The proposed development is set out in 7 no. blocks which comprise the following:

- Block A1 comprises 62. no. apartments within a part four, part six storey building, including 10 no. studio units, 7 no. 1-bedroom units, 41 no. 2 bedroom units, and 4 no. 3-bedroom units. An ESB substation is provided at ground floor level.
- Block A2 comprises 85 no. apartments within a part four, part eight storey building, including 25 no. 1-bedroom units, 45 no. 2-bedroom units, and 15 no. 3-bedroom units.
- Block A3 comprises 79 no. apartments within a part four, part twelve storey building, including 21 no. studio units, 19 no. 1-bedroom units, 28 no. 2-bedroom units, and 11 no. 3-bedroom units.
- Block B0 comprises 150 no. apartments and resident's amenities within a part four, part eighteen, part twenty-one and part twenty-two storey building. The apartments include 76 no. 1-bedroom units, 68 no. 2-bedroom units, and 6 no. 3-bedroom units (including 2 no. duplex type units). An ESB substation, resident's concierge area and amenity space (171 sq.m sq.m) are provided at ground floor level. A further resident's amenity / event space is provided at the twentieth and twenty-first floor levels (83 sq.m).
- Block B1 comprises 8 no. apartments and is four storeys in height, directly abutting Block B. The apartments include 4 no. 1-bedroom units, and 4 no. 2-bedroom units.
- Block C comprises 42 no. apartments and a local shop within a part five, part seven storey building. The apartments include 30 no. 1-bedroom units, 9 no. 2-bedroom units, and 3 no. 3-bedroom units. A local shop (154 sq.m) and an ESB substation are provided at ground floor level.
- Block D comprises 56 no. apartments, a commercial gym, resident's concierge area, resident's lounge, and a childcare facility in a part four, part seven storey building. The apartments include 22 no. 1-bedroom units, and 34 no. 2-bedroom units. The resident's concierge area (99 sq.m), commercial gym (340 sq.m), and childcare facility (300 sq.m) units are located at ground floor level. The resident's lounge (292 sq.m) is located at first floor level.

Two basement levels are proposed, providing car parking spaces (299 no.), bin stores, plant rooms, bicycle parking (1,000 no. spaces), and circulation areas. A further 240 no. bicycle parking spaces and 4 no. car parking spaces are provided at ground level. The proposed development includes landscaping, boundary treatments, public, private and communal open space (including roof terraces), two cycle / pedestrian crossings over the stream at the western side of the site, along with a new pedestrian and cycle crossing of Glenamuck Road South at the west of the site, cycle and pedestrian facilities, play facilities, and lighting. The proposed buildings include the provision of private open space in the form of balconies and winter gardens to all elevations of the proposed buildings. The development also includes vehicular, pedestrian, and cycle accesses, drop off areas, boundary treatments, services, and all associated ancillary and site development works.

4.5 POTENTIAL IMPACT OF THE PROPOSED DEVELOPMENT

The eastern half of the application site is situated within the zone of notification for National Monument Carrickmines Castle and associated features (DU026-005001–5). Excavations undertaken immediately east of the site revealed significant medieval settlement features associated with the medieval manor and it was suggested by the excavator that these features would extend to the south and east of the excavation boundary. Previous testing undertaken within the eastern half of the application site did not reveal any archaeology, instead it indicated a level of modern interference.

The site has been subject to some disturbance in the past with four houses and outbuildings present until recent years. It is currently significantly overgrown and partly covered in areas of demolition debris, with the northeast quadrant of site built-up by 1–2.25m with imported materials.

While the results of the 2007 investigation suggest that the intense archaeological activity does not extend into the application site, there remains the potential for previously unrecorded archaeological remains to exist beneath the original ground level, outside of the previously tested areas. These potential remains may be directly and negatively impacted upon by ground disturbances associated with the proposed development. Prior to the application of mitigation these impacts may range from moderate to very significant in nature.

4.6 POTENTIAL CUMULATIVE IMPACTS

No cumulative impacts are predicted upon the archaeological or cultural heritage resource.

4.7 ‘DO NOTHING’ IMPACT

If the proposed development were not to proceed, there would be no negative impact on the archaeological or cultural heritage resource, over and above any impact which has occurred as a result of the construction and demolition of structures associated with the former residential development on the site.

4.8 AVOIDANCE, REMEDIAL & MITIGATION MEASURES

ARCH&CH CONST 1:

Following clearance of all demolition debris and overgrowth and in advance of any construction or excavation, a strategic programme of testing will be implemented, in consultation with the NMS, to all investigate the previously untested areas. This assessment will be carried out under an extension to the Ministerial Consent C207 and Registration E003332 granted for the 2007 investigation.

Archaeological Test Trenching can be defined as ‘a limited programme of intrusive fieldwork which determines the presence or absence of archaeological features, structures, deposits, artefacts or ecofacts within a specified area or site on land, inter-tidal zone or underwater. If such archaeological remains are present field evaluation defines their character, extent, quality and preservation, and enables an assessment of their worth in a local, regional, national or international context as appropriate’ (CIfA 2014a).

Further mitigation such as preservation by record (excavation) / in-situ and/ or monitoring of groundworks may be required dependant on the results of the above investigation.

Archaeological Excavation, or preservation by record, can be defined as ‘a programme of controlled, intrusive fieldwork with defined research objectives which examines, records and interprets archaeological deposits, features and structures and, as appropriate, retrieves artefacts, ecofacts and other remains within a specified

area or site on land, inter-tidal zone or underwater. The records made and objects gathered during fieldwork are studied and the results of that study published in detail appropriate to the project design' (ClfA 2014b).

Archaeological Monitoring can be defined as 'a formal programme of observation and investigation conducted during any operation carried out for non-archaeological reasons, such as topsoil stripping during construction. This will be within a specified area or site on land, inter-tidal zone or underwater, where there is a possibility that archaeological deposits may be disturbed or destroyed. The programme will result in the identification of archaeology, the preparation of a report and an ordered archive (ClfA 2014c).

4.9 PREDICTED IMPACTS OF THE PROPOSED DEVELOPMENT

In the event that the proposed mitigation measures above are implemented fully, there will be no predicted residual impact to the archaeological and cultural heritage resource by the proposed development. The implementation of mitigation measures detailed in this chapter, will ensure that the effect is neutral and imperceptible.

4.10 MONITORING

The mitigation measures recommended above would also function as a monitoring system during construction to allow the further assessment of the scale of the predicted impacts and the effectiveness of the recommended mitigation measures.

4.11 REINSTATEMENT

Not applicable

4.12 INTERACTIONS

No interactions were identified during the course of this assessment.

4.13 DIFFICULTIES ENCOUNTERED IN COMPILING

There were no difficulties encountered in the compilation of this chapter.

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APPENDIX 4.1: SMR/RMP SITES WITHIN THE SURROUNDING AREA

RMP No.	Location	Classification	Description	Distance From Site
DU026-005005	Carrickmines Great	Ringwork	This site is located in low-lying terrain off the Golden Ball-Carrickmines Road. Excavations at Carrickmines castle in 2001 uncovered evidence for an earthen bank/fosse-defended enclosure which has been interpreted as an irregularly shaped ringwork castle (Clinton 2001, 87).	20m northeast
DU026-146	Carrickmines Great	Rock Art	This is one of three small boulders containing cup-marks which were discovered during archaeological investigations on the route of the South-Eastern Motorway (Clinton 2002, 87; 2004, 131).	80m east
DU026-005004	Carrickmines Great	Water Mill	This site is located in low-lying terrain off the Golden Ball-Carrickmines Road. A millrace runs from the site identified on the OS 1st edition map as 'site of an ancient mill' to the N of Carrickmines castle.	90m northeast
DU026-005001	Carrickmines Great	Bawn	This site is located in low-lying terrain off the Golden Ball-Carrickmines Road. Excavations at Carrickmines castle have revealed a double fosse/double bank along the NW flank of the site. To the SE of the inner castle area is a stone-revetted fosse interpreted as part of the southern curtain wall. This enclosed an area of angular form and was connected to an earlier enclosure by a causeway. Two linear fosses identified c 60m to the S of the castle may represent some form of outer defence line. These contained Saintonge pottery which was made in the Saintonge region of France in the 13th and 14th centuries (Clinton 2002, 72; 2003, 85-7; 2004, 131).	100m east
DU026-005003	Carrickmines Great	Fortification	This site is located in low-lying terrain off the Golden Ball-Carrickmines Road. The fields SW of Carrickmines castle are uneven with rock outcrop and a series of irregular ditches marked on the 1937 OS 6 inch map and interpreted as outer defences (pers. comm. Mr. Paddy Healy). These ditches create a number of raised sub-rectangular platforms (L c. 50m, Wth 30m). Monitoring of trial trenches adjacent to the castle in 1996 exposed a stone built drain of post-medieval date (Connolly 1997, 16-17). Excavations have since revealed a double fosse/double bank along the NW flank of the site. To the SE of the inner castle area is a stone-revetted fosse interpreted as part of the southern curtain	100m northeast

RMP No.	Location	Classification	Description	Distance From Site
			wall. This enclosed an area of angular form and was connected to an earlier enclosure by a causeway. Two linear fosses identified c 60m to the S of the castle may represent some form of outer defence line (Clinton 2002, 72, 2003, 85-7, 2004, 131).	
DU026-005001	Carrickmines Great	Castle	<p>The fragmentary remains of Carrickmines Castle have been incorporated into farm outbuildings. This is located in low-lying terrain off the Golden Ball-Carrickmines Road. The castle fragment comprises a section of wall (H 4m) built of randomly coursed blocks of granite. It contains a square-headed window under a round segmental arch at ground level. The documentary evidence indicates a castle in existence of Carrickmines from the 14th-century (Ball 1901, 195-203). This castle was apparently levelled following a battle in the 1641 rebellion.</p> <p>The fields SW of the castle are uneven with rock outcrop and a series of irregular ditches marked on the 1937 OS 6 inch map and interpreted as outer defences (pers. comm. Mr. Paddy Healy). These ditches create a number of raised sub-rectangular platforms (L c. 50m, Wth 30m). Monitoring of trial trenches adjacent to the castle in 1996 exposed a stone built drain of post -medieval date (Connolly 1997, 16-17). Excavations have since revealed a double fosse/double bank along the NW flank of the site. To the SE of the inner castle area is a stone-revetted fosse interpreted as part of the southern curtain wall. This enclosed an area of angular form and was connected to an earlier enclosure by a causeway.</p> <p>Two linear fosses identified c 60m to the S of the castle may represent some form of outer defence line. These contained Saintonge pottery which was made in the Saintonge region of France in the 13th and 14th centuries. Remains of a two-phase building were also exposed N of the castle area. Considerable quantities of late 13th/early 14th century pottery have been retrieved. Finds include an iron axehead, spindle whorls, leather shoes, rotary querns, iron keys, nails buckles and sundry implements. A cobbled surface a millpond, kiln and wells were also found on the site (Clinton 2002, 72, 2003, 85-7, 2004, 131).</p>	110m northeast

APPENDIX 4.2: OBJECTIVES RELATING TO THE PROTECTION OF ARCHAEOLOGICAL HERITAGE

DUN LAOGHAIRE RATHDOWN COUNTY DEVELOPMENT PLAN 2016–2022

Policy AH1: Protection of Archaeological Heritage

It is Council policy to protect archaeological sites, National Monuments (and their settings), which have been identified in the Record of Monuments and Places (RMP) and, where feasible, appropriate and applicable to promote access to and signposting of such sites and monuments.

Policy AH2: Protection of Archaeological Material in Situ

It is Council policy to seek the preservation in situ (or where this is not possible or appropriate, as a minimum, preservation by record) of all archaeological monuments included in the Record of Monuments and Places, and of previously unknown sites, features and objects of archaeological interest that become revealed through development activity. In respect of decision making on development proposals affecting sites listed in the Record of Monuments and Places, the Council will have regard to the advice and/ or recommendations of the Department of Arts, Heritage and the Gaeltacht (DoAHG).

BALLYOGAN & ENVIRONS LOCAL AREA PLAN 2019 - 2025

Policy BELAP A1 – Archaeological Assessment: To require Archaeological Impact Assessments, including an archaeological geophysical survey, with any Planning application for future redevelopment within lands containing, or adjoining, sites of archaeological interest, including recorded monuments.

Policy BELAP A2 – Archaeological Features: To incorporate historic features and archaeological remains into the design and layout of new development areas so as to link new development with its historical context and enhance the sense of unique identity.

CARRICKMINES CASTLE CONSERVATION PLAN 2017

The Carrickmines Conservation Plan 2015-2025 was formally adopted by Dun Laoghaire-Rathdown County Council on the 13th February 2017 to provide a framework for the conservation and management of the site of Carrickmines Castle. The vision for the management of the Carrickmines Castle Site is that Dún Laoghaire-Rathdown County Council will raise awareness of the history of Carrickmines Castle, conserve the upstanding remains, provide supervised access to the site to members of the public where possible and facilitate reasonable access to the site for academic research.

Policy 1: Preserve the surviving archaeological structures.

Policy 2: It is the policy of this Conservation Plan to raise awareness of the history of Carrickmines Castle.

Policy 3: The site will be maintained in such a manner to protect biodiversity while allowing safe reasonable access and safeguarding the archaeology of the site.

Policy 4: It is the policy of this Conservation Plan to provide intellectual and physical access where possible to the site of Carrickmines Castle.

Policy 5: To permanently store archaeological material not accessioned to the National Museum of Ireland below-ground at the Carrickmines site.

Policy 6: It is the policy of this Conservation Plan to manage and maintain the shells of the remaining the farmhouse and outbuildings in a manner consistent with the Department of Arts, Heritage and the Gaelteacht Architectural Heritage Protection Guidelines for Planning Authorities (2011).

Policy 7: Dún Laoghaire-Rathdown County Council to implement the Conservation Plan in consultation with relevant stakeholders.