



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

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17th October 2023

Planning Department
Dun Laogharie-Rathdown County Council,
County Hall,
Marine Road,
Dun Laogharie
Co. Dublin
A96K6C9

**Re: Issues Paper for the Kiltiernan / Glenamuck Local Area Plan Pre-Draft
Consultation Issues Paper 2024**

A chara,

Thank you for your authority's work in preparing the Issues Paper (the Issues Paper) for the proposed Kiltiernan / Glenamuck Local Area Plan (the LAP).

The planning authority is commended for publishing an Issues Paper, engaging proactively with the public, and notifying the Office of the intention to prepare the LAP.

In accordance with the provisions of section 31AO of the *Planning and Development Act 2000*, as amended (the Act), the Office is obliged to evaluate and assess local area plans to ensure alignment with national and regional planning policy and the objectives of your county Development Plan.

The Office has set out some broad issues relevant to the preparation of LAPs, in addition to some specific issues of particular relevance to the preparation of this LAP, under the following headings:

1. [Strategic policy framework](#)
2. [Zoning, compact growth and infrastructural services](#)
3. [Regeneration](#)

4. [Education, social and community amenities](#)
5. [Economic development, employment and retail](#)
6. [Transport and mobility](#)
7. [Climate change, including flood risk management](#)
8. [Environment, built and natural heritage](#)
9. [Implementation and monitoring](#)

The comments are offered without prejudice to any observations and recommendations by the Office at future stages of the plan-making process. They also do not affect the obligation on your planning authority to comply with the relevant legislative requirements, or to be consistent with the fullness of the detailed policy context of the higher order plans and strategies and Ministerial guidelines.

1. Strategic Policy Framework

Section 20(5) of the Act requires the LAP to be consistent with the objectives of the Regional Spatial and Economic Strategy (RSES), National Planning Framework (NPF), the specific planning policy requirements (SPPRs) of section 28 guidelines and the relevant development plan.

The Office encourages the planning authority to liaise with the Eastern & Midland Regional Assembly (EMRA) in preparation of the draft LAP, particularly where clarity is required on how the objectives and guiding principles set out in the RSES relate to the LAP.

The RSES sets out the strategic residential and employment development corridors in the Metropolitan Area Strategic Plan (MASP) to create sustainable compact communities with improved housing choice, access to social and economic opportunities, enhanced services and amenities for a resident population. In this regard, the RSES identifies a new residential community at Kiltiernan / Glenamuck with a new mixed-use centre at Kiltiernan along the Metrolink / LUAS Greenline Corridor.

The RSES also sets phasing and enabling infrastructure¹ such as road upgrades to support the development of a new residential community and new mixed use centre at Kiltiernan / Glenamuck.

The Kiltiernan / Glenamuck area has experienced significant residential development in recent years. In this regard a number of strategic objectives to support the existing and new community were set out in the preceding LAPs (2013 and 2007) which are also relevant to the next plan period including:

- bypass road of the village core of Kiltiernan;
- implementation of a Neighbourhood Framework Plan to consolidate the Village Core;
- graduation of residential densities from higher densities adjacent to the LUAS line (northern area of the LAP), to lower densities further from the main public transport artery; and
- provision of a centrally located major public open space / school site.

2. Zoning, Compact growth, density and infrastructural services

The Office notes that the physical growth of Kiltiernan has accelerated relatively rapidly in the last decade with significant development particularly residential schemes currently under construction at a number of sites off the Enniskerry and Glenamuck Roads. As outlined in the Issues Paper, there were 7 separate housing developments under construction at Q2 2023 providing for a potential of 791 units primarily to the western side of the LAP area. While the residential densities in the permitted developments appear to be generally consistent with the density bands in section 4.2 of the existing LAP, they have exceeded the density bands in some instances.

The draft LAP should review and strengthen the density standards having regard to relevant section 28 guidelines and any SPPRs therein, including:

- *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas: Cities, Towns & Villages (2009);*

¹ RSES Table 5.1 Strategic Development Areas and Corridors, Capacity Infrastructure and Phasing

- *Urban Development and Building Heights Guidelines for Planning Authorities* (2018); and
- *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities* (2020).

The planning authority's attention is also drawn to the *Sustainable and Compact Settlements Guidelines for Planning Authorities, Draft for Consultation August 2023*.

The draft LAP should also consider how the delivery of housing in locations that are well serviced in terms of the social and physical infrastructure, and are easily accessible by walking, cycling and public transport can be supported and prioritised.

3. Regeneration

Both the NPF (NPO 4 urban places, NPO 6 urban regeneration, NPO 18a proportionate growth, NPO 18b new homes and NPO 35 increasing residential use) and the policy objectives of the RSES emphasise the importance of opportunities for urban and village regeneration to create attractive, liveable, and high quality urban places.

In respect of the Kiltiernan / Glenamuck area, the Dun Laoghaire-Rathdown County Development Plan 2022 – 2028 (the Development Plan) contains policy objective RET7 which seeks to support the development of the Neighbourhood Centres as the focal point of the communities and neighbourhoods they serve, by way of the provision of an appropriate mix, range and type of uses – including retail and retail services subject to the protection of the residential amenities of the surrounding area. The Office notes that a site has been identified extending c. 3.8 Ha with zoning objective NC to provide for a neighbourhood centre.

In this regard, the forthcoming LAP should include a revised development framework for future development of the neighbourhood centre with appropriate guidance regarding layout, massing, permeability, green infrastructure and Sustainable Urban Drainage Systems (SuDS) etc as set out in section 5.7 of the LAP Guidelines.

The Office also recommends that the draft LAP includes a strong policy framework to support the utilisation of existing buildings, brownfield/infill sites, and derelict and underutilised sites, including proactive land activation measures and aligning with any relevant funding sources.

4. Education, social and community and amenities

Access to quality childcare, education and health services is a National Strategic Outcome of the NPF Regional Strategic Outcome 13 relates. The draft LAP should therefore seek to align population growth with investment in childcare and education facilities on well-located sites within or close to the existing built-up areas, to meet the diverse needs of local populations.

As such, the LAP should be informed by a social or civic infrastructure audit to establish the capacity of existing facilities, including community centres, leisure, amenity and cultural facilities to serve existing and future residents, and identify the need for any additional facilities.

It is also important that access to existing and proposed facilities by walking or cycling is prioritised consistent with the sustainable approach to settlement and mobility discussed below.

The Office notes that a strategic objective of the LAP will be to ensure the timely delivery of an appropriate range of social and community facilities in the Kiltiernan / Glenamuck area to meet the growing demands of an expanding community. In this regard, the Office notes that the Development Plan makes reference to the potential need for an additional school in the area and includes an objective on the zoning map. Consultation with the Forward Planning and Site Acquisitions Section of the Department of Education and integration with existing and proposed walking and cycling networks will be important in this respect.

The preparation of the draft LAP should also be informed by the planning authority's *Local Economic and Community Plan* and *Traveller Accommodation Programme 2019-2024* where relevant.

5. Economic development, employment and retail

The NPF, RSES and section 28 guidelines emphasise the need to take an evidence-based approach to the inclusion of objectives for employment and other commercial uses.

In particular, the LAP should be aligned with the detailed economic strategy and all relevant guiding principles of the RSES, in addition to any objectives concerning strategic enterprise / employment sites. The Office notes that a portion of the Carrickmines

Strategic Employment site is located within the northern extent of the LAP area which comprises c. 8.7 Ha of employment lands.

The Office notes that two other Strategic Employment Locations are located within the vicinity of the LAP area at Cherrywood and Sandyford with significant capacity for employment growth. In this regard, the Office would encourage the planning authority to ensure that active travel is prioritised to provide sustainable mobility patterns particularly between new residential / mixed use areas and the Strategic Employment Locations.

The Office notes Specific Local Objective (SLO) 82 in the Development Plan which seeks 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 6,000 sqm and a leisure facility, to assist the existing and future retail and leisure needs of the growth areas of Carrickmines, Stepside Ballyogan and Kiltiernan-Glenamuck, while also protecting employment use at this location.

It is noted that, any future development of the north east quadrant should ensure that the Ballyogan link road, parkland area and greenway are completed and available for use by the general public before occupation of development. In this regard, the emerging LAP should consider how this SLO is to be fulfilled during the plan period.

The facilitation of retail facilities also need to be considered to provide for the anticipated population growth. Particular regard should be given to the sequential approach to the location of retail development and other provisions of the *Retail Planning Guidelines for Planning Authorities (2012)* and the position of the settlement in the retail hierarchy of the Development Plan. The Office notes that Kiltiernan is identified as a Key Development Area in the retail hierarchy set out the development plan which seeks to promote mixed-use potential of Neighbourhood Centres as appropriate, subject to protection of local amenities.

6. Transport and mobility

The *Climate Action Plan 2023* identifies the need to significantly reduce car kilometres and increase sustainable journeys, guided by the *National Sustainable Mobility Policy (2022)* and the proposed National Demand Management Strategy.

The integration of land use and transportation is centrally important to this objective and to the objectives and provisions of the NPF (NPO 27 alternatives to the car, NPO 33 location of new homes and NPO 64 air quality, among others) and the RSES.

The Office welcomes the preparation of a Local Transport Plan using the Area Based Transport Assessment methodology, and consistent with Policy Objective T2 of the Development Plan.

Given the location and existing constraints in the area, the delivery of an effective transport network in the LAP area will be of critical importance to ensure the delivery / implementation of the LAP. In this regard, it is noted that the limitations of the existing road network will require significant investment and upgrading to facilitate movement within and around the LAP area particularly in relation to active travel measures.

The Office notes that the Glenamuck District Roads Scheme (GDRS) is included in the Development Plan table 5.3 as a six-year road objective, and is further detailed in the Kiltiernan Glenamuck Local Area Plan 2013. The Office welcomes the recent progress of this scheme which has completed its detailed design stage with works expected to commence in Q4 of 2023 on the Glenamuck District Distributor Road running from De La Salle grounds in Stepside to Carrickmines roundabout with completion expected in Q3 2024. The Office notes that works will then commence on Glenamuck District Link Road to Kiltiernan.

The provision of much improved sustainable travel options will however be a critical if the emerging neighbourhood is not to become dependent on the private car as the dominant mode of transport for both commuter and local trips. The Office notes that the existing LAP for Kiltiernan / Glenamuck makes provision several active travel upgrades which include but are not limited to;

- The upgrade of the Glenamuck Road to facilitate pedestrian and cyclist use of the road on an improved alignment;
- A cycle route linking Ballyogan Road to the Enniskerry Road via the proposed Jamestown Park; and
- Provision of a Greenway including a walkway/cycleway connecting the planned Neighbourhood Centre at Kiltiernan to the proposed Jamestown Park and beyond.

Further active travel measures may also emerge from the transport assessment and should be integrated into the draft LAP.

The planning authority is strongly advised to liaise with the National Transport Authority (NTA) and Transport Infrastructure Ireland (TII) in the preparation of the ABTA / LTP to align the objectives and initiatives with the emerging LAP and to set out a clear implementation strategy for the delivery of both local road upgrades and active travel measures.

In addition, the LAP should set out an ambitious (but realistic) modal shift target for the Kiltiernan / Glenamuck area.

In order to increase the potential for trips to be made on foot, bicycle or public transport, the LAP should demonstrate consistency with Avoid-Shift-Improve principle and the 10-minute town concept, as well as providing for the proactive implementation of the *Design Manual for Urban Roads and Streets* (revised 2019) and the NTA's *Permeability Best Practice Guide* (2015).

Consistency with the NTA's Transport Strategy for the Greater Dublin Area is required for LAPs within the GDA planning authorities.

7. Climate action, including flood risk management

It is a National Strategic Outcome of the NPF to transition to a low carbon climate resilient society. The effective implementation of climate mitigation objectives through the LAP are critical to the achievement of the Government's Greenhouse Gas emissions reduction target to mitigate climate change.

In this regard, the Office welcomes the acknowledgement of the issue of climate action in the Issues Paper and notes that it is a strategic county outcome of the Development Plan to promote a climate resilient county.

In addition to the cross cutting climate considerations discussed above, consistency with:

- NPO 53 (land use);
- NPO 54 (climate targets);
- NPO 55 (renewable energy); and

- NPO 57 (flood risk),

together with the relevant objectives of the RSES and the Development Plan, will be of particular importance in this respect.

It is likely that flood risk management will be the most critical climate change adaptation measure to be addressed in the LAP, informed by a Strategic Flood Risk Assessment (SFRA), and the planning authority is strongly advised to liaise with the Office of Public Works in the early stages of preparing the SFRA.

In accordance with NPO 57, the LAP is required to integrate sustainable water management solutions, such as SuDS. In this regard, the Office draws the planning authority's attention to *Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, Water Sensitive Urban Design, Best Practice Interim Guidance Document (2022)*.

8. Environment and natural and built heritage

The planning authority is the competent authority for Strategic Environmental Assessment and Appropriate Assessment, and will be aware of the section 28 *Strategic Environmental Assessment Guidelines for Regional Assemblies and Planning Authorities (2022)* and the *Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities (2009)*.

The planning authority should also ensure the LAP is consistent with objectives of the NPF and RSES concerning environmental protection. From our experience in assessing statutory plans the Office has found that, in addition to the objectives identified above that might also apply to this subject, particular consideration should be given to:

- NPOs 58 (green infrastructure);
- NPO 62 (greenbelts);
- NPO 63 (water infrastructure); and
- NPO 64 (air quality).

The Office also highlights the importance of integrating green and blue infrastructure into the LAP consistent with NPO 58. Planning for green and blue infrastructure can contribute to climate change adaptation, in particular flood risk management through nature-based

solutions. It can also make a positive contribution to climate mitigation and have positive impacts on biodiversity.

Regarding built-heritage, the planning authority should consider what location specific objectives or measures would assist in the protection or improvement of built heritage over the period of the LAP. Accordingly, the planning authority should have regard to the *Architectural Heritage Protection Guidelines for Planning Authorities (2004)*, as amended.

9. Implementation and monitoring

The NPF and the RSES place increased emphasis on the importance of monitoring the implementation of statutory strategies and plans to measure plan effectiveness and to continually update a relevant evidence base to inform future planning strategies.

The planning authority is therefore encouraged to set out specific provisions for monitoring the implementation of the objectives of the LAP, having regard to the provisions of the Development Plans Guidelines and the Local Area Plans Guidelines.

Summary

In summary, the Office commends the planning authority for the preparation of this Issues Paper. The Office advises the local authority to pay particular attention to the following issues in the preparation of the LAP:

- integration of the Local Transport Plan and the LAP, particularly in relation to prioritising active travel measures to provide sustainable mobility patterns for new residential / mixed use areas and the Strategic Employment Locations, and including a clear implementation strategy;
- provide a clear strategy for the graduation of residential densities consistent with national and regional policy;
- review the Neighbourhood Framework Plan to ensure consistency with up to date policy and standards;
- clearly identify social infrastructure requirements to serve the rapidly growing community, including liaising with the Department of Education in relation to the delivery of school facilities.



The Office looks forward to reviewing the future draft LAP and to continued positive engagement with your authority in the implementation of national and regional policies at the county and local level.

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

Is mise le meas,

Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluations
