



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

OPR Ref: MA-015-23

19th August 2025

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

Re: Proposed Material Alterations to Draft Old Connaught Local Area Plan 2025

A chara,

Thank you for your authority's work in preparing the proposed Material Alterations (material alterations) to the draft Old Connaught Local Area Plan 2025 (Local Area Plan).

As Dún Laoghaire-Rathdown County Council (the Planning Authority) is aware, a core function of the Office of the Planning Regulator (the Office) is the strategic evaluation and assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning. This includes a requirement to make submissions on statutory plans, including any observations or recommendations the Office considers necessary to ensure the effective co-ordination of national, regional and local planning requirements.

The Office has evaluated and assessed the proposed material alterations under the provisions of sections 31AO(1) and 31AO(2) of the Planning and Development Act 2000, as amended, and within the context of the Office's earlier recommendations and observations.

The Office's evaluation and assessment of the proposed material alterations has regard to the Dún Laoghaire-Rathdown County Development Plan 2022-2028 (County Development Plan), the Regional Spatial and Economic Strategy (RSES) for

Teach na Páirce, 191-193A An Cuarbhóthar Thuaidh, Baile Átha Cliath 7, D07 EWV4.

Park House, 191-193A North Circular Road, Dublin 7, D07 EWV4.

T +353 (0)1 854 6700 | E info@opr.ie | W www.opr.ie

Eastern and Midland Regional Assembly Area (EMRA) and the relevant section 28 guidelines.

Overview

As outlined in the Office's submission to the draft Local Area Plan, the Office considered the draft Old Connaught Local Area Plan 2025 to be consistent with the RSES for EMRA and the relevant section 28 guidelines.

The Office's submission made three (3) observations on the draft Local Area Plan to enhance its alignment with the County Development Plan, the objectives of the RSES and section 28 guidelines in regard to core strategy, compact growth/zoning and infrastructural capacity, and urban village and retail sections of the draft Local Area Plan.

The Office is generally satisfied with the responses to the observations and the clarity of the responses in the Chief Executive's Report (CE's Report). In particular, the Office welcomes MA 2 with the inclusion a new paragraph and table at section 4.3.1 by way of response to Observation 1. This now identifies the distinct 4 Character Areas, their site scale and potential residential yield which provides clarity and a baseline information which links with the Phasing Implementation section. However, it is noted that the requisite density for each Character Area has not been included in this table and also noted that the potential residential yields have been amended due to material alterations which will be further addressed below.

The Office also acknowledges the CE's Report comments and welcomes MA 13 which proposes the insertion of a new bullet point into Policy Objective OCLAP23 to address Observation 3, which aims to protect the vitality and viability of the established neighbourhood centres or higher tier centres in the wider area including Bray. The Office also acknowledges the explanation regarding the scale of the retail provision at the proposed Neighbourhood Centre at different sections of the document and accepts the approximate broader band figure at section 5.4.4 of 1,000-1500 (gross square metres) and acknowledges the specific figure at 5.2 has been caveated.

The Office also notes and welcomes a number of other material alterations including MA 17 which includes reference to the National Transport Authority's (NTA) Cycle Design Manual at Policy OCLAP34 Cycle Parking, MA 23 strengthening Policy OCLAP37 to ensure the preservation of the views and prospects of Old Connaught and MA 25 which includes reference to supporting wind and battery storage systems at Policy OCLAP63 Renewable Energy Use.

The inclusion of MA 29 also positively inserts new text which aims to provide flexibility in the Phasing Plan and allows for infrastructure provision to be implemented earlier in the phase should circumstances permit. MA 30 to undertake a further study on the operation of Thornhill Road to review traffic operation of the road is similarly positive.

While the Office has commended and accepts the extensive work undertaken by the Planning Authority in regard to the Infrastructure Capacity Assessment Study and notes the CE's Report comments by way of response to Observation 2, that the requisite infrastructure has been identified particularly in chapter 11 Phasing and Implementation, the Office remains of the view that the draft Local Area Plan would benefit from the insertion of a summary table which focuses on the trigger points for the implementation of key infrastructure requirements so all relevant parties are fully aware of the stages and how these interventions will support the integration of the provision of New Residential zonings within the Old Connaught Area.

Apart from the matters raised below, the Office therefore considers the approach taken to the proposed material alterations has been robust and evidence based.

It is within this context the submission below sets out two (2) observations under the following two themes:

Key theme	Recommendation	Observation
Consistency with development plan and core strategy - residential density	-	Observation 1

Infrastructure and phasing	-	Observation 2
--	---	-------------------------------

Recommendations issued by the Office relate to clear breaches of the relevant legislative provisions of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28. As such, planning authorities are requested to implement or address recommendation(s) made by the Office to ensure consistency with the relevant policy and legislative provisions.

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

A submission can include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. Planning authorities are requested by the Office to give full consideration to the advice contained in a submission.

1. Consistency with the development plan and core strategy – residential density

The Office notes MA 1 and the proposed change to the overall residential yield at table 1.3 and also MA 3 which proposes a change of use from Strategic Open Space to Residential at 50-60 density per hectare at lands north of Jubilee Hall and MA 4 and MA 5 which propose to reduce residential density bands at Central, Southern and Western Character Areas by approximately 10 units per hectare and MA 6 which proposes to reduce two small pockets of land to the east of the Central Character Area by 10-20 units per hectare. The Office is satisfied, however, that the material alterations align with the core strategy of the County Development Plan and the spatial arrangement of density across the Local Area Plan area is considered appropriate.

The provisions for average and minimum density footnotes attached to MA 4 and MA 5 will also ensure consistency with Policy Objective 3.1 and section 3.3.1 of the

Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) to achieve appropriate densities that respond to place contexts.

However, the Office would recommend in the interests of transparency and accuracy that the Planning Authority reviews the density figures and overall residential yield for zoned land and update table 1.3 and table 4.1 accordingly and also insert the proposed density ranges for the 4 Character Areas and subsections to table 4.1. This will establish a useful and accurate baseline for future variations or updates to Development Plans, Guidelines for Planning Authorities (2022), including the implementation of Revised National Planning Framework housing growth requirements.

MA Observation 1 - Core strategy – residential density

Having regard to:

- the core strategy for Dún Laoghaire-Rathdown County Development Plan 2022-2028;
- Policy Objective 3.1 and section 3.3.1 of the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) to achieve appropriate densities that respond to place contexts; and
- appendix A of Development Plans, Guidelines for Planning Authorities (2022),

the Planning Authority is advised to:

- (i) review residential density and population figures at MA 1, MA 2, MA 3, MA 4, MA 5 and MA6 to confirm accuracy and subsequently revise and update table 1.3 where necessary;
- (ii) revise table 4.1 to include a column of revised densities into the 4 Character Areas and segregated sub sections where appropriate; and

- (iii) insert any necessary revised densities in text onto figure 11.1 (chapter 11) for all 4 Character Areas and new sub-sections for density ranges and phasing within.

2. Infrastructure and phasing

The Office notes proposed material alterations at MA 26 which involves the uplifting of approximately one third of Phase B or 100% of the Southern Character area into the first Phase A. This equates to an increase of approximately 400-450 residential units to an earlier phase as part of the overall Phasing Strategy. While the Office supports the desire to deliver new homes in the Local Area Plan area, it will be important to ensure that this can be achieved with the identified transport infrastructure improvements to existing road network and the provision of new active travel interventions.

In this respect, the Office notes that MA 26 has been raised as a concern in table 5.1 Overall Findings - Summary of Effects arising from the Proposed Material Alterations that are subject to SEA in the Strategic Environmental Assessment (SEA) and highlights that this alteration will result in a higher number of journeys by car, delayed implementation of active travel measures and an increase in greenhouse gas emissions and likely to exceed the capacity of the local transport network. In particular, it highlights that the proposed alteration would introduce uncertainty regarding the phasing of the proposed bus gate which would affect the optimal sequencing of transport interventions. The SEA also concludes that the alteration will be contrary to 10-minute neighbourhood concept and habitants will be unable to walk, cycle or use public transport to access facilities in a 10-minute timeframe, which is one of the key overarching transport policies, Policy OCLAP30 of the draft Local Area Plan.

The Office also notes NTA's comments regarding Phasing and Implementation at draft stage highlighting the importance of transport infrastructure in advance of delivery of housing at Phase B:

The NTA is broadly supportive of this proposed Phasing sequence, which prioritises land closest to existing public transport services east of the M11 in the short term. Subsequent phases, to the west and south of the LAP, would be dependent on the delivery of a range of infrastructure including transport measures such as new roads, bus services and active travel facilities.

As such, the Office recommends the Planning Authority reviews of the Phasing Plan and ensures that the quantum of residential units to transfer over to Phase A is aligned with the need for public transport, active travel and local road network improvements to appropriately serve the new housing within a reasonable timeframe.

The Office also notes MA18, MA19, MA20 regarding the upgrade to the Wilford Roundabout and the issues raised also at summary table, table 5.1 from the SEA and would recommend that the Planning Authority review these material alterations in consultation with NTA and Transport Infrastructure Ireland to ensure the overall success of the Transport Strategy and wider Phasing and Implementation Plan for the draft Local Area Plan.

MA Observation 2 - Infrastructure and phasing

Having regard to the need for integration of land use and sustainable transportation and the transition to a low carbon and climate resilient society including the reduction of greenhouse gas emissions and in particular to:

- RPO 4.40, RPO 5.3, RPO 8.1 and RPO 8.4 of the RSES; and
- Policy Objectives T1 and T2 of the Dún Laoghaire - Rathdown County Development Plan 2022-2028,

the Planning Authority is advised to:

- (i) review the phasing of development to ensure that it is aligned with the sequencing of key transport infrastructure implementation including existing road network improvements, provision of bus gates and the implementation

of the N11/M11 Junction 14 Improvement Scheme and vehicular bridge over the N11; and

- (ii) review MA 18, MA 19 and MA 20 in consultation with National Transport Authority and Transport Infrastructure Ireland regarding Wilford Roundabout to protect the delivery of the Transport Strategy and Phasing and Implementation Plan of the draft Old Connaught Local Area Plan 2025.

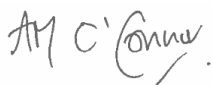
In summary

The Office's evaluation and assessment of the proposed material alterations concludes that no recommendations are warranted, and the substantive issue contained in observations of the Office's submission on the draft Local Area Plan has been satisfactorily addressed.

However, the Office considers that the final Local Area Plan would benefit from some further modifications and review to address the issues raised as observations above.

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 plans@opr.ie.

Is mise le meas,



Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluation

Designated Public Official under the Regulation of Lobbying Act 2015
