

**FINGAL COUNTY COUNCIL
CHIEF EXECUTIVE'S REPORT
DRAFT KELLYSTOWN LOCAL AREA PLAN**

Introduction:

In accordance with Section 20 of the Planning and Development Act 2000 (as amended) the Draft Kellystown Local Area Plan went on public display from Thursday 17th September 2020 to Friday 6th November 2020 at Fingal County Council Offices, County Hall Swords, Civic Offices Grove Road Blanchardstown, Blanchardstown Library, Luttrellstown Community Centre and on the Fingal County Council on line consultation portal <https://consult.fingal.ie/en/browse>

The purpose of this report is to:

- Report on and provide a summary of the written submissions and observations received in relation to the Draft LAP during the consultation period.
- Set out the Chief Executive's response to the issues raised in the submissions and observations and make recommendations to the Elected Members on the issues.
- Note: All changes as recommended have been subject to Strategic Environmental Assessment & Appropriate Assessment Screening.

Structure of the Report:

This report contains the following:

- (A) Chief Executive's Recommendations.
- (B) List of persons/organisations who made submissions
- (C) Summary of issues raised in submissions, the opinion of the Chief Executive in relation to the issues raised and recommendations.
- (D) Summary of recommendations.
- (E) Overall Recommendation.

New text is denoted in green italics e.g. *new text*

Deleted text is denoted as red strikethrough e.g. ~~deleted text~~

Appendices:

- (1) Statement of Compliance with DMURS
- (2) Screening of Recommendations for Strategic Environmental Assessment & Appropriate Assessment.

Editorial changes and updating of the draft Plan will be carried out and minor typographical or graphical errors or discrepancies will be rectified.

PART A CHIEF EXECUTIVE'S RECOMMENDATIONS:

CER 1 Insert new paragraph after paragraph two, page V of the LAP as follows:

Where there is any discrepancy between the LAP and the relevant statutory Development Plan, the written statement and corresponding maps and appendices of the Development Plan in force at the time will take precedence.

CER 2 Amend the following text at Page V, Section entitled Public Consultation as follows:

~~Delete existing paragraph on public consultation (In June 2019, Fingal County Council published a Strategic Issues Paper for Kellystown. The consultation period ran for 6 weeks concluding on 31st July 2019. A total of 21 no. submissions were received during this time, each of which has been considered in the making of this Draft LAP. A public drop in information session was held at the Blanchardstown Civic Centre on 3rd July 2019 as part of the public consultation activities and was well attended) and~~ replace with the following text

Pre-draft public consultation, which included a Strategic Issues Paper, was held in 2019 and informed the Draft LAP. Public consultation on the Draft Plan was between 17th September and 6th November 2020. Taking account of COVID 19, the consultation period exceeded the statutory requirements and included extensive awareness raising through a range of platforms including a number of display locations throughout the County, print media, social media, radio, virtual meetings, webinars and leaflet drops.

CER 3 Delete Section 1.4 of the Draft LAP

~~In June 2019, Fingal County Council published a Strategic Issues Paper for Kellystown. The consultation period ran for 6 weeks, concluding on 31st July 2019. A total of 21 no. submissions were received during this time, each of which has been considered in the making of this Draft LAP. A public drop in information session was held at the Blanchardstown Civic Centre on 3rd July 2019 as part of the public consultation activities and was well attended. Submissions generally related to the following issues:~~

- ~~• Transport and movement, including the electrification of the Maynooth railway line and removal of level crossings;~~
- ~~• Retail and economic development, including the scale of development and size of individual units given proximity to Clonsilla Village and Blanchardstown Shopping Centre;~~
- ~~• Population and housing unit mix, densities, variety of housing types and formats;~~

- ~~• Open space and recreation future uses and amenities as well as current Annex 1 designation;~~
- ~~• Approved burial ground availability of space for Muslim Community;~~
- ~~• Active open space location of redeveloped St. Mochta's grounds;~~
- ~~• Building design height, layout, and quality;~~
- ~~• Green infrastructure protection of trees and hedgerows and reuse for amenity value;~~
- ~~• Education provision of school spaces as well as number and location of schools;~~
- ~~• Climate change and sustainability importance of building sustainable communities which are energy efficient and which facilitate walking and cycling; and~~
- ~~• Infrastructure including the servicing of existing properties in the area.~~

Provide new updated text in paragraph 1.4 as follows:

A series of preparation and consultation stages were taken in advance of the Kellystown Local Area Plan, including Pre-Draft Consultation and publication of a Draft LAP.

Pre-Draft Consultation

A Strategic Issues Paper was prepared and published to help inform pre-draft publication consultation, which took place in June 2019. A number of key issues were raised which helped to shape and inform the Draft LAP.

Draft LAP

A Draft LAP was published and consultation took place between 17th September and 06th November 2020. A total of 109 no. submissions were received during this period of public consultation including submissions from prescribed bodies, landowners, community groups, organisations and individual members of the public. Print media and social media were also used extensively. The issues raised in the submissions have informed the making of the Local Area Plan together with a series of other consultations with stakeholders. The draft Local Area Plan was also available for viewing in a number of public offices and locations throughout Fingal. The content of the Draft LAP was also informed by other key requirements, such as Flood Risk Assessment, baseline ecological surveys and studies and Strategic Environmental Assessment and Appropriate Assessment Screening.

CER 4 Insert new paragraph examining Objective 130 under paragraph entitled Fingal Development Plan 2017-2023. Section 7.1 Relevant Planning and Policy Documents of the Movement and Transport Strategy.

Objective 130

To fulfil the requirement of Objective 130, the Planning Authority as part of an examination of proposals for Kellystown Road, has undertaken a two-stage options assessment to determine the preferred route. This included the preparation of a Stage 1 Route Options phase which identified a do- nothing option together with nine alternative route options. The emerging preferred route- Option 3 providing for a crossing of the Royal Canal and the Dublin Maynooth Rail line at Barberstown provides the optimum location for the required road bridge and an appropriate link with approved strategic road infrastructure - Barnhill Ongar road which will serve the developing areas of Barnhill and Hansfield SDZ as well as the wider hinterland.

CER 5 Insert the following text under Section 6.3.1 Approach to the Development Area (new bullet point)

- *Facilitate remote working/community hubs to support local employment in the area.*

CER 6 In the 2nd paragraph 3rd column page 29 remove name of consultants ~~Clifton Scannell Emerson Associates~~ and replace with *consultants*.

CER 7 To ensure consistency with Figure 8.5 amend the text of Objective 8.8 to read as follows:

The following hedgerows/treelines shown on Figure 8.5 shall be retained: ~~H1~~, H2, H5, ~~H6, H7~~, H8, ~~H9, H10~~, *H12*, H13, ~~H15~~, H16 ~~H17, and H19~~, except were required to facilitate the construction of the Kellystown Link Road.

CER 8 Amend DA1.8 Section 6 Eastern Development Area Page 23 'Provide for temporary land uses ~~such as live work units~~ to the north-east portion of land in order to preserve the land for a future transport node at this location.

CER 9 Printing Error: Annotated text 'Upgraded Level Crossing' north of Western Development Area Figure 5.2 Kellystown Opportunities in Context Vision and Development Strategy Page 19 amended to read *Existing level Crossing*.

PART B LIST OF PERSONS/ORGANISATIONS THAT MADE SUBMISSIONS:

A total of no. 109 submissions were received during the public display of the Draft Kellystown Local Area Plan between the 17th of September 2020 and the 6th November 2020. All submissions have been given careful and serious consideration and Fingal County Council wish to thank those who engaged in the public consultation process. Listed in Table No. 1 are the submissions received including the name of the person or organisation making the submission and its allocated identification number.

Table No. 1: List of Submissions

ID NO.	Title	First Name	Surname	Organisation/on behalf of
FIN C331-1	Mr.	Darren J.	Prior	
FIN C331-2	Mr.	Mark	Byrne	Transport Infrastructure Ireland
FIN C331-3	Mr.	Nathan	Phipps O'Neill	
FIN C331-4				Garda Westmanstown Rugby Football Club
FIN C331-5				Department of Transport
FIN C331-6	Ms.	Suzanne	Forbes	
FIN C331-7	Mr.	Tony	Devlin	
FIN C331-8	Mr.	Ivo	Brett	
FIN C331-10	Mr.	Michael	MacAree	National Transport Authority
FIN C331-11	Ms.	Patricia	Brown	
FIN C331-12	Ms.	Urszula	Pabijan	
FIN C331-13		Chris	Yeates	
FIN C331-14	Ms.	Mary	Lenahan	
FIN C331-15	Ms.	Margaret	Drysdale	
FIN C331-16				St. Mochta's F.C.
FIN C331-17		Agnieszka	Eska	
FIN C331-18	Mr.	Jesus	Caballo	
FIN C331-19	Mr.	Jerome	Corby	
FIN C331-20	Ms.	Clodagh	Kenny	
FIN C331-21	Mr.	Peter	Alexander	
FIN C331-22	Mr.	Mark	Adamson	Office of Public Works
FIN C331-23		Phyl	Kenny	
FIN C331-24	Mr.	Noel	Kenny	
FIN C331-25	Mr.	Sean	Kenny	
FIN C331-26	Mr.	Manuel	Moreno	
FIN C331-27	Ms.	Grainne	Yeates	
FIN C331-28	Mr.	Cian	O'Mahony	Environmental Protection Agency
FIN C331-29	Mr.	John	Stinson	
FIN C331-30	Ms.	Nora	O'Rourke	

FIN C331-31	Mr.	John	Park	
FIN C331-32	Ms.	Mariada	Fidanza	
FIN C331-33	Mr. Mr.	Richie Eugene	Lynch O'Sullivan	Garda Westmanstown Gaels GAA Club
FIN C331-34	Mr.	John	Sweeney	
FIN C331-35	Ms.	Lynda	Masterson	
FIN C331-36	Ms.	Maria	Alexiuc	
FIN C331-37	Mr.	James	Long	
FIN C331-38	Mr.	Martin	O'Malley	
FIN C331-39	Mr.	Radoslaw	Slomski	
FIN C331-40	Mr.	John	Mooney	
FIN C331-41	Ms.	Rachel	Furlong	
FIN C331-42	Mr.	Colm	Reid	Mr. Kevin Molloy
FINC331-43	Mr.	Ronan	McKitterick	
FIN C331-44		Chris	Moore	
FIN C331-45	Ms.	Susan	Hardiman	
FIN C331-46	Ms.	Niamh	Digan	
FIN C331-47	Sen	Emer	Currie	
FIN C331-48	Ms.	Hannah	Furlong	
FIN C331-49	Mr.	Stephen	Rafferty	
FIN C331-50	Ms.	Josephine	Reilly	
FIN C331-51	Mr.	Michael	Lawler	
FIN C331-52	Mr.	Martin	Duffy	
FIN C331-53	Mr.	Paul	Corcoran	Fingal Cycling Campaign
FIN C331-54	Ms.	Niamh	McDonald	Irish Water
FIN C331-55	Ms.	Anne Marie	O'Connor	Office of the Planning Regulator
FIN C331-56		Jan Robert	Nelson Nelson	Strawberry Beds Residents Association
FIN C331-57	Mr.	Pat	Lynch	
FIN C331-58		Stephen Little & Associates		Castlethorn Construction UC & Castlethorn Developments Kellystown UC (Castlethorn)
FIN C331-59	Cllr.	Ted	Leddy	
FIN C331-60	Ms.	Anne	Mooney	
FIN C331-61	Ms.	Angela	Mooney	
FIN C331-62	Mr.	John	Dungan	Porters Gate Residents' Association
FIN C331-63	Ms.	Niamh	Duffy	
FIN C331-64	Ms.	Kamila	Plackowska	
FIN C331-65		Lukasz	Plackowski	
FIN C331-66	Mr.	Paul	Masterson	
FIN C331-67	Ms.	Claire	Ni Lochlainn	
FIN C331-68	Ms.	Jill	Fitzgerald	
FIN C331-69	Mr.	Grzegorz	Jablonski	

FIN C331-70	Mr.	Louis	Watters	
FIN C331-71	Ms.	Ciara	O'Neill	
FIN C331-72	Ms.	Emanuela	Aioanei	
FIN C331-73	Ms.	Sharon	Austin	
FIN C331-74	Mr.	Gerard	McGee	
FIN C331-75	Mr.	Adrian	Iosif Aioanei	
FIN C331-76	Mr.	Conor	McGee	
FIN-C331-77	Mr.	Ciaran	McGee	
FIN-C331-78	Ms.	Aleksandra	Jablonska	
FIN-C331-79		Blanchardstown Traveller Development Worker DMVF Architects		St. Brigid's Lawn residents
FIN-C331-80	Ms	Yvette	O'Brien	Parents Council Luttrellstown Community College
FIN-C331-81	Mr. Mr.	Colm Mark	Reynolds Conroy	Iarnród Éireann Dart+ Programme
FIN-C331-82	Ms.	Yvette	O'Brien	
FIN-C331-83	Mr.	Sean	Rafferty	
FIN-C331-84	Mr.	Grzegorz	Jablonski	
FIN-C331-85	Ms.	Sarah	Rafferty	
FIN-C331-86	Mr.	Kevin	O'Ceallaigh	
FIN-C331-87	Ms.	Aleksandra	Jablonska	
FIN-C331-88	Ms.	Celia	Durnin	Dublin 15 Community Council
FIN-C331-89	Mr.	Colm	Kelly	
FIN-C331-90	Cllr.	Howard	Mahony	
FIN-C331-91	Ms.	Liyang	Zhang	
FIN-C331-92	Mr.	Michael	Murphy	Department Tourism, Culture, Arts, Gaeltacht, Sport and Media.
FIN-C331-93	TD Cllr. Cllr.	Roderic Daniel Pamela	O' Gorman Whooley Conroy	
FIN-C331-94	TD	Paul	Donnelly	
FIN-C331-95	Mr.	Conor	O' Ceallaigh	
FIN-C331-96	Dr	Robert	Quigley	
FIN-C331-97	Mr	Mark	Allen	
FIN-C331-98	Ms.	Colette	Spears	Residents of St. Brigid's Lawn Porterstown
FIN-C331-99	Ms.	Małgorzata	Słomska	
FIN-C331-100	Cllr.	Siobhan	Shovlin	
FIN-C331-101	Ms	Ciara	Thornberry	
FIN-C331-102	Mr.	Charlie	Kurtz	
FIN-C331-103	Mr.	Pat	Lynch	

FIN-C331-104	Mr.	Lorcan	O' Ceallaigh	
FIN-C331-105	Mr.	Alan	Hanlon	Department of Education and Skills
FIN-C331-106	Ms	Shaunagh	M	
FIN-C331-107	Mr	Brian	O' Connor	
FIN C331-108	Cllr.	John	Walsh	
FIN-C331-109	Ms	Anne Reid Associates Chartered Town Planners	Mulcrone	Mr. Neil McDermot
FIN-C331-110	Ms Mr.	Katie Alberto	McLoughlin Rossi	

PART C: SUMMARY OF ISSUES RAISED IN SUBMISSIONS AND THE OPINION OF THE CHIEF EXECUTIVE IN RELATION TO THE ISSUES RAISED AND RECOMMENDATIONS:

PRESCRIBED BODIES:

1.0 Office of Public Works

Summary of issues raised:

- (a) The submission from the Office of Public Works (OPW) welcomes Fingal County Council's commitment to adhering to the Planning System and Flood Risk Management – Guidelines for Planning Authorities.
- (b) The inclusion of a Sustainable Drainage Strategy report is noted and supported by the OPW. The submission also supports the recommendations of the Strategic Flood Risk Assessment regarding detailed hydraulic modelling suggesting it is included as an objective.

Chief Executive's Response:

- (a) Noted and welcomed.
- (b) Noted and welcomed. A new objective can be included to reflect the SFRA.

Recommendation:

Insert new objective 11.20 after objective 11.19 page 65 of the LAP as follows:

Objective 11.20 Detailed hydraulic modelling shall be carried out as part of Site-Specific Flood Risk Assessments, as required and re-number subsequent objectives in this Section accordingly as 11.21 to 11.24.

2.0 Environmental Protection Agency

Summary of issues raised:

- (a) The EPA notes the proposed determination that SEA of the LAP is not required.
- (b) The EPA recommends that that Plan is consistent with the need for proper planning and sustainable development and that adequate and appropriate critical service infrastructure should be in place or required to be put in place to service any development proposed and authorised during the lifetime of the plan.
- (c) The submission states that there is merit in considering the re-zoning of certain areas of Open Space to 'Green Space' which may provide greater protection to those areas with greater biodiversity value in particular.
- (d) Other recommendations include consideration of the forthcoming EPA's State of the Environment report, clarity and examination of the requirement to protect and develop existing groundwater sources and aquifers and notification when a SEA determination is made.
- (e) The EPA indicates that there is merit in integrating the All Ireland Pollinator Plan with regard to landscaping and planting considerations.

Chief Executive's Response:

- (a) The submission of the EPA is welcomed and noted.
- (b) The Plan aligns with national commitments on climate change mitigations and adaptation and with the key higher levels plans and programmes ensuring consistency with all relevant objectives and policy commitments of the National Planning Framework and the Eastern and Midlands Regional Spatial and Economic Strategy. The provision of critical service infrastructure to serve the plan lands is reflected in the phasing section of the Draft LAP.
- (c) The rezoning of land can only be undertaken through the Development Plan process. It is noted however, that Green and Blue Infrastructure Objectives set out under Section 8.6 of the Draft Plan are robust and will ensure the delivery of this key infrastructure as part of development proposals
- (d) Section 4 of the Draft Plan – Climate Change and Environmental Sustainability will take cognisance of the next iteration of the EPA's State of the Environment report which is due to be published in November. The comments of the EPA on Objective 11.21 are noted, the details of which will be addressed as part of the development management process. The EPA will be notified as required regarding SEA determination.

- (e) An objective will be included in Chapter 9 – Parks, Open Space and Recreation requiring the inclusion of the All Ireland Pollinator Plan as part of landscaping and planting considerations.

Recommendation:

Section 4 of the Draft Plan – Climate Change and Environmental Sustainability. Insert the following after paragraph two page 14. *It is a general objective of this LAP to support the achievement of the above key environmental actions and those of the any subsequent State of the Environment reports.*

Include new objective on Page 55 Chapter 9 – Parks, Open Space and Recreation as follows *Objective 9.15 ‘All landscaping and planting proposals shall include appropriate measures to implement the All-Ireland Pollinator Plan.’*

3.0 Irish Water

Summary of issues raised:

- (a) The submission from Irish Water in which it states it has no objection to the Draft Local Area Plan for Kellystown is welcomed. Housing densities and the number of units in the three areas are in line with the Metropolitan Area Strategic Plan (MASP) and the Regional Economic and Spatial Strategy (RESS) and will assist in contributing to the long-term population capacity in the north west corridor.
- (b) Water Supply Objectives contained within the Plan are welcomed.
- (c) Irish Water confirms it has no current plans to connect the development area to water supply infrastructure and such connections should be developer led with all applications made through Irish Water’s Connection and Developer Services Section.
- (d) Foul Water Objectives 11.4-11.8 are welcomed by Irish Water.
- (e) New infrastructure including pumping stations and rising mains and a railway and canal crossing may be required to service the development areas and will be developer led. There is capacity in the network to cater for this development -phasing at connection application stage may be required.
- (f) Wastewater will flow into the Greater Dublin Drainage area and will be dependent on the progress of the relevant improvements works at Ringsend Waste Water Treatment Plant and the Greater Dublin Drainage project (GDD). Completion dates outlined in Section 3 of the LAP are subject to change.
- (g) Reference should be made to reflect Irish Water’s updated Investment Plan.

Chief Executive's Response:

- (a) Irish Waters submission endorsing the approach of the Draft LAP in contributing to the long-term population capacity in the north west corridor and provision of housing densities in line with the Metropolitan Area Strategic Plan (MASP) and the Regional Economic and Spatial Strategy (RESS) is welcomed.
- (b) Noted
- (c) Noted
- (d) Noted
- (e) And f) Section 12 of the Plan addresses phasing arrangements requiring the provision of wastewater facilities including pumping station as required be delivered in tandem with new development. This will be extended to also provide for required water supply infrastructure.
- (f) As (e) above
- (g) Section 3 Environmental Issues and Opportunities contains an extract from Section 7.2 of the Fingal Development Plan which references Irish Waters Capital Investment Plan 2014-2016 (or any updated plan). Section 3 will be amended to take into consideration that the completion dates for drainage infrastructural works by Irish Water are subject to change.

Recommendation:

Amend Section 12 Phasing of Development Page 67 to include:

Provision of all necessary infrastructure to connect the development area to water supply infrastructure and all necessary connections shall be delivered in tandem with new development

Amend the text in Section 3.4 Page 8 Water & Wastewater Section 3- Environmental Issues and Opportunities as follows:

'The Irish Water Capital Investment Programme includes the Greater Dublin Drainage Project which seeks to provide a new regional wastewater treatment facility and the associated infrastructure to serve the growing population of the Dublin area. ~~Irish Water forecasts that the project will be complete by 2024.~~ *Irish Water forecasts that the completion date of 2024 may be subject to change.*

4.0 Office of the Planning Regulator

Summary of issues raised:

- (a) **Observation 1:** *The Office would encourage the planning authority to consider the insertion of an objective to provide for periodic stock-taking and review of the*

Kellystown LAP in the light of the implementation of planned public transport and active travel infrastructure in the area and the potential for further development in accordance with government policy along public transport corridors.

- (b) **Recommendation 1:** *The planning authority is required to consider a better resolved approach in urban form and density policy consistent with national policy in relation to the north western section of the draft LAP and to achieve a successful spatial and functional linkage to and from Clonsilla train station.*

This should be done on an evidence-based approach, consistent with Government policy under section 28 guidelines, including inter alia the Guidelines for Planning Authorities Sustainable Residential Development in Urban Areas (2009), to increase residential density in such locations to maximise return on planned investment in commuter rail services.

- (c) **Observation 2:** *The planning authority is requested to conduct a review of the proposed layout and design of the draft LAP to ensure that it demonstrably implements the principles, approaches and standards to road and street design set out in DMURS, including, in particular:*

-How planned development will directly address the R121, the proposed link road (including the western development area) and Diswellstown Road; and

-Pedestrian and cycle permeability, connectivity, priority and safety throughout the site and with the surrounding area, with particular regard to key external destinations.

- (d) **Recommendation 2:** *The planning authority is required to provide for a revised network of cycle and pedestrian routes, which is comprehensive and integrated, and provides direct connections to/from:*

- *key attractors*
- *residential areas and schools and other facilities.*

in accordance with NTA's Transport Strategy for the GDA 2016-2035 to increase walking, cycling and public transport and to achieve safe, extensive and integrated active and sustainable transport mode networks.

Chief Executive's Response:

- (a) **Observation 1:** The Local Authority acknowledge the submission of the Office of the Planning Regulator. It is considered that the Planning and Development Act 2000 (as Amended) covers the requirement to statutorily review Local Area Plans.
- (b) **Recommendation 1:** The Western Development Area seeks to promote high density development with the need to provide a sensitive approach to archaeology and the re-use of Greenmount House a building of local vernacular character. Objective 6.4 also addresses this matter. While the density proposed in the LAP is in accordance with Ministerial Guidelines, the approach to promoting density and urban design in the western development area can be strengthened and made clearer.
- (c) **Observation 2:** To demonstrate the LAP's alignment with the principles and approaches set out in DMURS, a statement of compliance has been prepared and is

appended to this report. The compliance note demonstrates that the design of the LAP will promote sustainable living, through the prioritisation of measures supporting active travel and access to public transport. The LAP provides a comprehensive network of walking and cycling routes, via the street network and separate greenways, linking the residential lands to internal and external places of attraction.

- (d) **Recommendation 2:** The LAP provides direct pedestrian and cyclist links to/from the LAP lands to external destination points; including Clonsilla Village, Blanchardstown Centre, the train stations, external schools, parks and neighbourhood areas. Whilst some of these routes follow existing roads, the plan also includes for the provision of segregated paths and greenways remote from the traffic network, utilising the canal, existing hedge ways and open spaces. All cycle routes will be designed safely in accordance with the requirements of the National Cycle Manual. The indicative cycle and pedestrian network through the LAP area will be updated to clearly show all the pedestrian and cycle connections with key attractors such as the Clonsilla and Coolmine train stations, the bus services on Diswellstown Road, the district centre at Clonsilla and other residential areas and schools.

Recommendation:

- (a) No change
- (b) Amend Objective DA 3.1 to read as follows: Provide for a high quality residential area adjacent to Clonsilla Railway Station *at the upper end of densities supported across the LAP providing strong urban form and promote densities commensurate to the proximity to a railway station as per Section 28 Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (May 2009) and any subsequent Guidelines.*

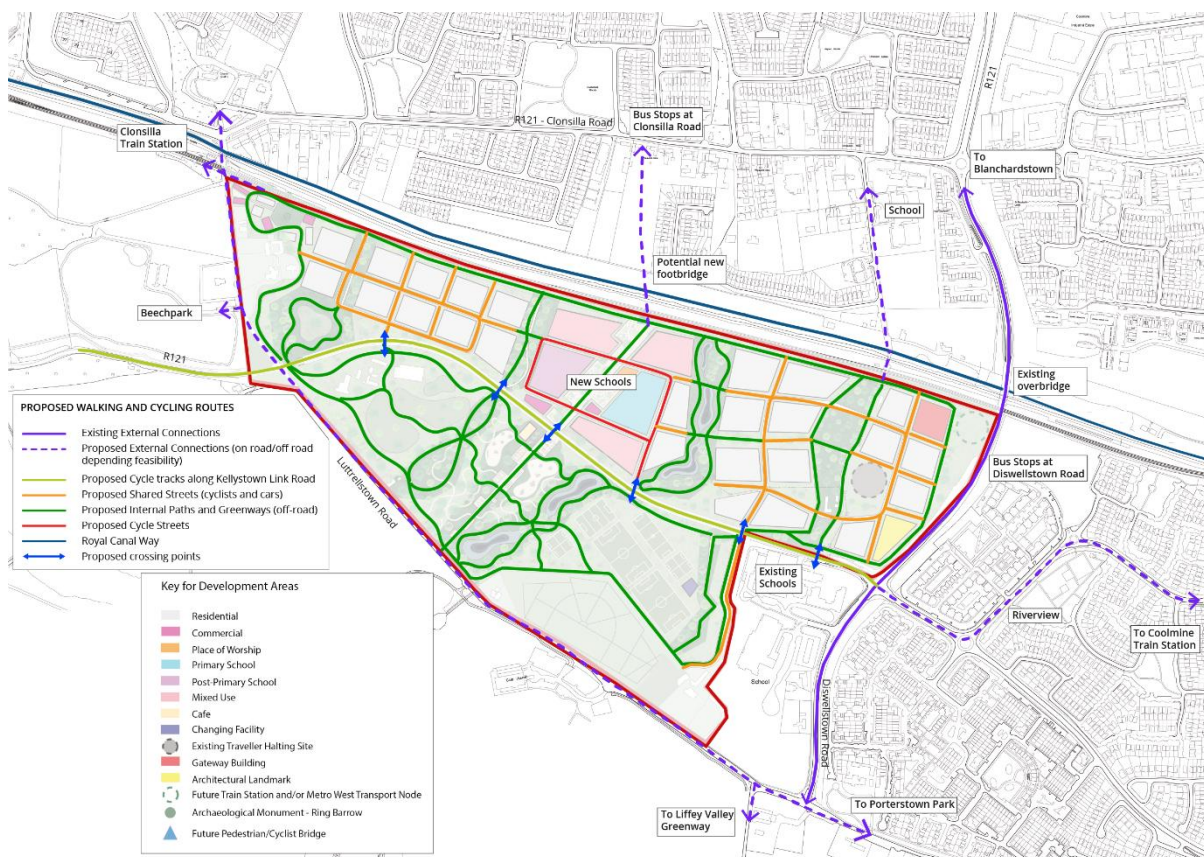
Alternative Layout: Western Development Area



Note: The layout and detail of design for the various development areas will be carried out as part of the Development Management process, adhering to the parameters and objectives of this LAP. Greenmount Demesne, while not a protected structure is of vernacular merit.

(c) See Appendix 1 of this report.

(d) Figure 7.11 Movement and Transport Strategy. The indicative cycle and pedestrian network through the LAP area will be updated to clearly show all the pedestrian and cycle connections with key attractors such as the Clonsilla and Coolmine train stations, the bus services on Diswellstown Road, the district centre at Clonsilla and other residential areas and schools. (Note: annotated text 'Proposed footbridge' north of the Western Development Area removed- printing error)



Updated Figure 7.11 Movement and Transport Strategy

In addition, additional text will be inserted under Section 7.6 LAP Internal Walking and Cycling Links Page 36 Section 7.6 Movement and Transport strategy as follows:

The internal links of the Kellystown LAP have been designed to maximise permeability for pedestrians and cyclists. Pedestrian and cyclist facilities are provided along the road network in addition to a series of interweaving greenways. In addition, filtered permeability for cyclists and pedestrians will be provided between the three main development areas where it will not be feasible to drive from one development area to the other without exiting onto the Kellystown Road, however it will be feasible to walk or cycle internally between the cells via a series of internal paths and greenways.

5.0 Department of Tourism, Culture, Arts Gaeltacht, Sports and Media

Summary of issues raised:

- (a) The Department welcomes the approach of the plan to the protection of the flora and fauna present in the area and notes positively the lands to the south which form a buffer between Luttrellstown Demesne and the Liffey Valley proposed Natural Heritage Area and/or subject to the Liffey Valley Special Amenity Order. Also welcomed are proposals to maintain a riparian corridor and a dark corridor along the northern boundary adjacent to the Dublin-Maynooth railway line and the Royal Canal and will be of considerable value to various wildlife species
- (b) While noting the ecological studies completed, the Department recommends that further surveys of the plan area and the adjacent Royal Canal pNHA are required. This should include analysis of badgers, otter holts, couches and other evidence of the presence of otter, as well as further bat surveys.

Chief Executive's Response:

- (a) The acknowledgement by the Department of the extensive ecological surveys carried out to inform the draft LAP is welcomed. This has included the undertaking of a number of baseline ecological surveys, including a flora and habitat survey (which was extended to cover the adjacent Royal Canal pNHA), a hedgerow appraisal survey and a bat and bird survey. As also acknowledged by the Department, the survey information has helped to determine the most important hedgerows/ treelines and habitats to protect under the LAP and has informed the key objectives and guiding principles of a number of key chapters including Green and Blue infrastructure, Parks Open Space and Recreation as well as the Development Areas.
- (b) The Royal Canal Greenway is a separate project and has independently undertaken a number of important ecological studies including the 'Royal Canal Urban Greenway Biodiversity Assessment 2018' prepared by Natura which includes Canal Breeding Waterbird Survey and a Mollusc Survey; an 'Ecological Study of the Royal Canal between Talbot Bridge and Maynooth Train Station' prepared by BEC consultants in 2013, as well as a number of Bat Surveys including that undertaken by Dr. Tina Aughney in 2019. The absence of water courses within the plan area reduces the potential for otters. An existing pond at the northern boundary is protected. The feasibility of providing a mammal corridor under the proposed Kellystown road linking the two SuDs components and providing onward connection to Luttrellstown golf course will be considered as part of the detailed design of the road.

The hedgerow appraisal undertaken as part of the site surveys did not identify any badger setts within the Plan lands.

Additional mitigation measures may be integrated to the LAP to include the following:

- Installation of bat bricks as part of new buildings as recommended in the Biodiversity for Low and Zero Carbon Buildings: A Technical Guide for New Build (RIBA and BCT 2010)
- Recommend the installation of swift boxes on new taller buildings again in line with the above guidance. This could also be extended to include for house martin, swallow and house sparrow boxes.

It is further noted that ecological surveys for any future developments within the Plan lands will also take appropriate account of the canal and associated habitats.

Recommendation:

Insert new text under 'Kellystown Link Road- Minimisation of Severance Effects Section 8 Green and Blue Infrastructure Page 49

- *The feasibility of providing a mammal corridor shall be examined during the design stage of the Kellystown road at a point linking the northern and southern SuDs components to allow large mammals such as otters and badgers to travel through the plan lands from north to south (from the Royal Canal to the Liffey Valley via Luttrellstown Demesne).*
- *The installation of bat bricks as part of new buildings to provide for new bat roosting sites (as recommended in the Biodiversity for Low and Zero Carbon Buildings: A Technical Guide for New Build (RIBA and BCT 2010) shall be considered for properties located along the northern boundary of the Plan lands and in the vicinity of the riparian corridor and SuDs features.*
- *The installation of swift boxes as well as nest boxes for house martin, swallow and sparrow, on new taller buildings shall be considered in all developments.*

6.0 Department of Education and Skills

Summary of issues raised:

- (a) The submission from the Department of Education and Skills confirms the requirement for a primary and a post primary level school to serve the plan lands as

set out in Section 10.2 and also Figure 9.4 of the Plan. The submission states that the LAP should include an additional objective regarding the availability of other outdoor space outside the sites reserved and makes reference to a number of design recommendations regarding block locations, car parking and set down areas.

- (b) The Department's arrangements for the establishment of new schools dictate that new schools are generally only established to serve demographic need where existing schools in an area cannot, between them, cater for demand. In determining the need for a new school, the Department may consider areas outside of the immediate LAP area as being relevant to serve the population of the local area concerned.

Chief Executive's Response:

- (a) Noted and welcome.
- (b) The indicative layout for the proposed primary and post-primary schools in the Kellystown LAP lands were designed using the Urban School Model and are in line with the Department's Technical Guidance Document '*TGD-025 Identification and Suitability Assessment of Sites for Primary Schools*' and Technical Guidance Document '*TGD-27 Identification and Suitability Assessment of Sites for Post Primary Schools*'. In this regard, the playing pitches located within the southern portion of the LAP lands have been identified for off-site elements of the urban school's model. The indicative layout for the two schools will be subject to future design and feasibility studies by the Department as part of the development management process, this will take into consideration parking, set down and other design elements.

The Department's indication that they may consider sites outside the LAP lands is noted however, it is prudent for this LAP to plan on the basis of schools in this area being required given existing and future population growth.

Recommendation:

No change

7.0 Transport Infrastructure Ireland

Summary of issues raised:

Transport Infrastructure Ireland has no observations to make in relation to the plan and states that public transport planning is a matter for the National Transport Authority.

Chief Executive's Response:

The comments of Transport Infrastructure Ireland are noted.

Recommendation:

No change

8.0 Department of Transport

Summary of issues raised:

- a) The Department refers to its ongoing review of sustainable mobility policy which will replace the existing sectoral policy documents published in 2009- Smarter Travel a Sustainable Transport Future 2009-2020 and the National Cycle Policy Framework.

- b) The Department requires that the Draft LAP reflect policy in relation to National Disability Inclusion Strategy and the ratification by Ireland of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD). This requires state parties, including Local Authorities, to ensure access for persons with disabilities to the physical environment and transport in both urban and rural areas.

To make public transport fully accessible to people with disabilities requires a ‘whole journey approach’ and a universal design to the built environment including footpaths, roads, pedestrian crossing points and bus stops shelters.

Chief Executive’s Response:

- (a) The submission from the Department of Transport is welcomed and review of sustainable mobility policy is noted.
- (b) The ethos behind the delivery of a ‘whole journey’ approach is one which the draft LAP promotes. A universal design to the built environment including footpaths, roads, pedestrian crossing points and bus stops shelters are fundamental to the formation of a successful well integrated built environment and are principles which are promoted in the Kellystown LAP.

Recommendation:

Insert new objective after Objective 7.22 Page 38 Movement and Transport Strategy

Objective 7.23 ‘Ensure a universal design approach to the built environment including footpaths, roads, pedestrian crossing points and bus stops shelters to ensure access for all’.

9.0 National Transport Authority

Summary of issues raised:

- (a) The Authority expresses support of the key movement and transport principles of the LAP.
- (b) The NTA states that while the wording is not definitive, the plan for DART+ West makes no provision for a new train station at Porterstown and advises that the LAP should not rely on this and should focus on providing direct connections to the two existing stations, the bus network and on providing optimum conditions for walking and cycling.
- (c) The submission notes the continued support in the draft LAP for the provisions of Local Objective 137 and states it is critical that the LAP be designed to reflect the objectives of DART+West. The Plan should be designed to reflect the movement objectives of the area given that the closure of the road is mitigated by the Diswellstown Road and by the Barberstown link forming part of the proposed Kellystown Road.
- (d) In relation to Bus Connects, the Kellystown area will be served by the L52 on the Clonsilla Road (or future route to be determined) and the P65 and 34 on the Diswellstown Road.
- (e) The provision of east-west movement for pedestrians and cyclists will be critical in order to access public transport services in Clonsilla and Coolmine Stations and a number of desire lines must be reflected in the movement networks in the Plan. Greater clarity is required in relation to connectivity to Clonsilla station and lands closest to Clonsilla station should be better utilised to provide higher densities and services.
- (f) The submission states that the mode share assumptions should not reflect the status quo in relation to the continued reliance on the private car when designing and planning for a new neighbourhood within walking and cycling distance of good public transport links and with high quality pedestrian and cycle networks.
- (g) Figure 7.11 should clearly reflect the pedestrian and cycle bridge at Porterstown proposed as part of DART +West which will continue to facilitate the strong desire line between schools and community facilities and should be clear as to the level of provision which is provided for on these routes. In order to encourage modal shift for school trips in particular, clear safe routes for the entire length of the trip should be provided. Potential conflicts at north south and east west intersections should be addressed and all intersections should be designed to give priority to pedestrians and cyclists.

- (h) The final LAP should reflect a comprehensive network of walking and cycling routes from all residential areas to all key destinations within and beyond the LAP area and should include the principle of filtered permeability whereby movement of walking and cycling is accommodated at certain locations without facilitating vehicular access.
- (i) The NTA recommends that basement car parking at the higher density sites should be an option for residential car parking.
- (j) The design of cycle infrastructure including cycle parking should be guided by the NTA's National Cycle Manual which should be reflected in the Local Area Plan.

Chief Executive's Response:

- (a) The submission from the NTA and its support for the key movement and transport principles contained within the Draft Kellystown LAP is welcomed.
- (b) Objective DMS122 of the Fingal Development Plan 2017-2023 identifies the need to retain the previous Metro West Corridor to support future potential orbital demand between Tallaght, Blanchardstown and the airport. While the Light Rail Corridor has not been included in the Government's Capital Programme and does not form part of the NTA's Greater Dublin Area Transport Strategy 2016-2035, a significant amount of preliminary design work has already been carried out and it is considered prudent to retain the corridor free from development as addressed in Objective DMS122. Irish Rail has indicated that its DART expansion programme does not preclude advancement of a station in the future at this location.
- (c) Local Objective 137 of the Development Plan seeks to '*preserve the exiting pedestrian and vehicular right of way at the level crossing at Porterstown*'. The Draft Kellystown LAP continues to support Local Objective 137 and does not contain proposals to amend the existing levels of vehicular and pedestrian permeability at Porterstown level crossing. It should be noted that transport and movement strategy of the LAP is not predicated on the closure of this crossing to vehicular traffic.
- (d) Comments with respect to Bus Connects are welcomed.
- (e) In terms of proposed layout and integration of networks, the LAP prioritises the movement needs of vulnerable roads users, providing a hierarchy of segregated and protected footway and cycle routes linking the future residential development to schools, public transport nodes and neighbouring residential areas and attractions. It is an objective of the LAP to provide the required pedestrian and cyclist links to/from the LAP lands to external destinations, including Clonsilla Village, Blanchardstown

Centre, the train stations, external schools, parks and neighbourhood areas. This also includes the provision of appropriate pedestrian and cycle linkages to Clonsilla station and this is provided for under Objective 7.5 of the Plan - 'Provide safe walking and cycling links to Clonsilla Rail Station'. Figure 7.11 will be updated to clearly illustrate the link to Clonsilla Train Station.

- (f) With regard to the mode share of 63%, it is important to state that this is not a target mode share, but a reflection of the potential mode share for the site based on the provided infrastructure. Given the proximity of the site to existing and future bus and rail services, the substantial investment in walking and cycling infrastructure, and proposed supporting mobility management and parking demand management measures; it is envisaged that a greater level of sustainable trip making will take place at Kellystown. Section 7 of the report will be updated to note that the 63% car mode share is a potential outcome, but that there is potential for a more sustainable mode share to be achieved.

- (g) The preservation and extension of desire lines from and to key destinations external to the plan lands including from St. Mochta's F.C. and Luttrellstown College is a key principle of the LAP. A dedicated pedestrian and cycle route is provided through the LAP linking Clonsilla, St. Mochta's F.C. and Luttrellstown College. Figure 7.11 of the Plan will be updated to present these links in a clearer manner. In addition, Objective 7.6 of the LAP seeks to provide appropriate pedestrian/cyclist facilities at the Porterstown level crossing. Figure 7.11 will be updated to clearly present this. In relation to perceived conflict at intersections north south/east west cycle movements it should be noted that whilst the cross section on Figure 7.7 illustrates the intention to provide a segregated cycle route along the East West Street, supported by cycle friendly roundabouts, it is agreed that the cycling map (Figure 7.11) could be made clearer to indicate the proposed cycle provision on each cycle route within the LAP lands. Accordingly Figure 7.11 will be updated to reflect the proposed cycle provision on each route.

- (h) The concept of filtered permeability for cyclists and pedestrians has been adopted throughout the Kellystown LAP. For example, there are three main development cells situated to the north of the proposed Kellystown Road. It is not feasible to drive from one cell to the other without exiting onto the Kellystown Road, however it is feasible to walk or cycle internally between the cells via a series of internal paths and greenways as illustrated in Figure 7.11. Accordingly Figure 7.11 will be updated to illustrate this point.

- (i) In relation to surface / basement car parking, the LAP has specified that a progressive parking strategy should be adopted for the site which encourages sustainable travel, however, the means by which the parking will be accommodated (at grade or basement) has not been specified. Additional text will be included in the LAP requiring that basement car parking at the higher-density sites should be considered for residential car parking.

- (j) Confirmation that the LAP will comply with NTA's National Cycle Manual is addressed under Objective 7.4 of the LAP which seeks to '*ensure delivery of the appropriate road infrastructure in line with the LAP road hierarchy of streets to develop the lands to their full potential. The design should be in accordance with the principles outlined in the Design Manual for Roads and Streets (DMURS) and the NTA's National Cycle Manual.* With regard to cycle parking facilities, sheltered bike parking is already provided at Clonsilla Station (30 secure spaces), however the Local Authority will work with Irish Rail to secure additional spaces as demand arises.

Recommendation:

Under Section 7.3 Demand for Travelling- Modelling Analysis Conclusions Movement and Transport Strategy Page 32, insert the following additional text at the end of the first paragraph:

It is important to note that the presented mode shares are not a target but a reflection of the potential mode share for the site based on the provided infrastructure. Given the proximity of the site to existing and future bus and rail services, the substantial investment in walking and cycling infrastructure and proposed supporting mobility management and parking demand management measures; it is envisaged that a greater level of sustainable trip making will take place at Kellystown.

Figure 7.11 LAP Walking and Cycling Network Page 40 Movement and Transport Strategy will be updated to clearly illustrate links to Clonsilla Train Station.

Figure 7.11 LAP Walking and Cycling Network Page 40 Movement and Transport will be updated to reflect the proposed cycle provision on each route.

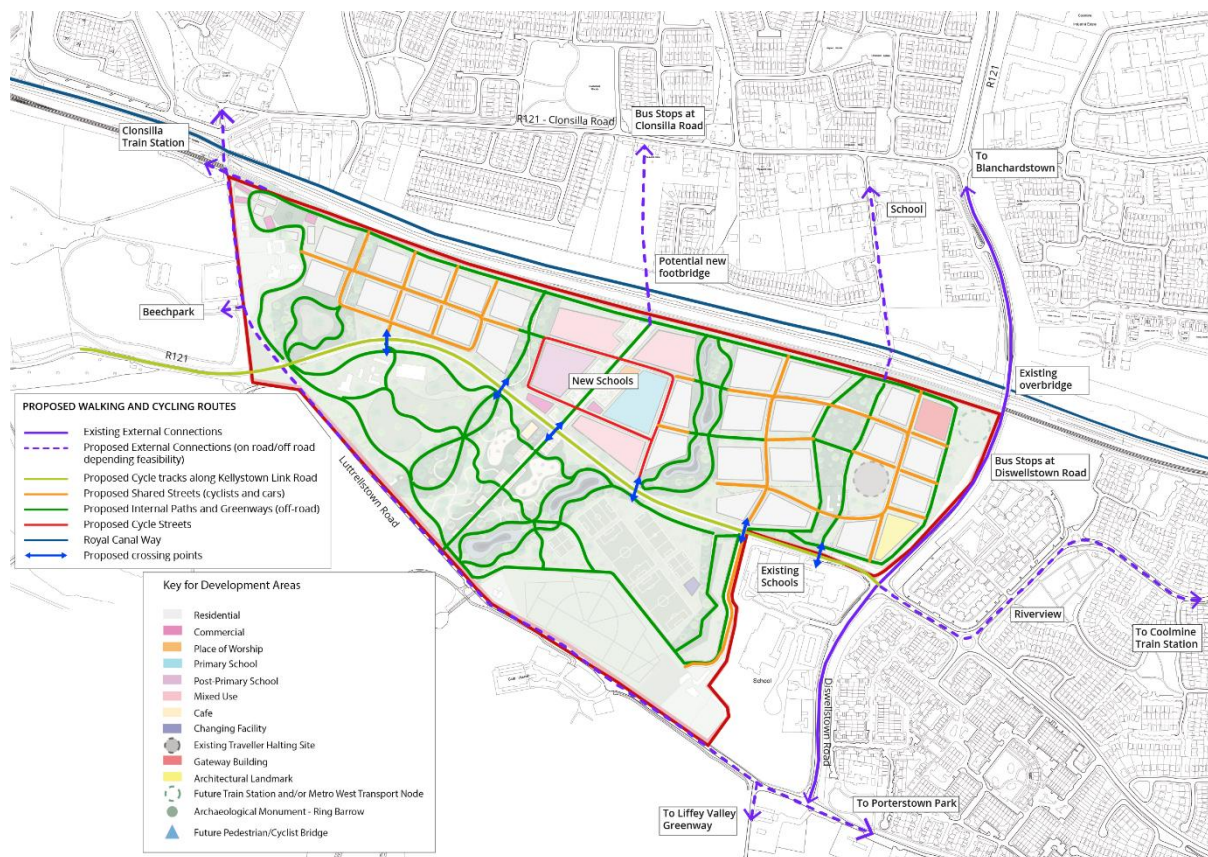
Insert additional text under Section 7.6 LAP Internal Walking and Cycling Links Page 36 Section 7.6 Movement and Transport Strategy:

The internal links of the Kellystown LAP have been designed to maximise permeability for pedestrians and cyclists. Pedestrian and cyclist facilities are provided along the road network in addition to a series of interweaving greenways. In addition, filtered permeability for cyclists

and pedestrians will be provided between the three main development areas where it will not be feasible to drive from one development area to the other without exiting onto the Kellystown Road, however it will be feasible to walk or cycle internally between the cells via a series of internal paths and greenways.

Insert the following text under Section 7.7 Parking Strategy -Residents Car Parking Page 37 Movement and Transport Strategy:

Consideration should be given to the provision of basement car parking in higher density residential schemes.



Updated Figure 7.11: LAP Walking and Cycling Network

10.0 Iarnród Éireann

Summary of issues raised:

- (a) Iarnród Éireann recognises that the Draft LAP is in full compliance with the Fingal Development Plan including all local objectives. A resultant consequence of increasing rail capacity under the DART +West project is the negative impact on the road environment at existing level crossings. DART+West is seeking to permanently close

existing level crossings at Porterstown, Clonsilla, and Barberstown and in lieu of same will provide a pedestrian and cyclist bridge crossing at Porterstown and Clonsilla and a full cyclist and vehicular bridge crossing at Barberstown level crossing. Iarnród Éireann requests that Fingal County Council takes due regard to the DART+ West design intent in the assessment of the feedback from the public consultations and finalisation of the LAP.

- (b) Comments made with regard to LAP Objectives, 7.5, 7.6, 7.7, 7.8, 7.14 are noted.
- (c) In addition, the submission notes and welcomes the build out of the development areas without linkage to the delivery of the DART +West programme.

Chief Executive's Response:

- (a) The submission from Irish Rail and its recognition that the Draft Plan is considered to maximise the beneficial use of the existing rail corridor is noted and welcomed.
- (b) DART + West, is a project under the DART + Programme being undertaken as part of the transport strategy for the Greater Dublin Area is noted. The delivery of the Kellystown LAP is not contingent upon the DART West Programme or any infrastructural works being examined as part of this scheme.
- (c) While the submission notes that a railway station at Porterstown is not included under DART + programme, the programme does not preclude advancement of a station in the future in line with Objective DMS122 of the Fingal Development Plan. It is considered prudent to safeguard the site and provide for appropriate interim uses.

Recommendation:

No change

PUBLIC SUBMISSIONS BY THEMES/CATEGORIES

11.0 GENERAL

Submissions received relevant to this section:

FIN C331-19, FIN C331-21, FIN C331-23, FIN C331-46, FIN C331-60, FIN C331-61, FIN C331-69, FIN C331-72, FIN C331-80, FIN C331-84, FIN C331-87, FIN C331-96, FIN C331-107, FIN C331-108.

Summary of Issues Raised:

- (a) Formation of a sub-committee of all stakeholder organisations and citizens to meet regularly to discuss the common themes/co-dependence of plan/projects and the impact on the Dublin 15 area.
- (b) Luttrellstown Community College Parents Association have requested that parents have access to cemetery car park during school hours
- (c) Incorporation of Old School House at Porterstown into LAP.
- (d) Adequacy of Public Consultation
- (e) Compliance with European Noise Directive

Chief Executive's Response:

- (a) The preparation of the LAP has had regard to the environmental sensitivity of the lands and surrounding areas. The proposed land uses are entirely consistent with the underlying land use zoning objectives – Residential Area and Open Space – of the Fingal Development Plan 2017-2023, which itself was subject to full Strategic Environment Assessment and Appropriate Assessment. The Royal Canal Urban Greenway Project is at a preliminary stage and has not been subject to EIA. The DART + West project is at early design and assessment stages of the planning and EIA process. This project will be required to have regard to Kellystown LAP in its EIA process. The formation of a subcommittee of all stakeholder organisations and citizens to meet regularly to discuss the common themes of co-dependence between each plan and the impact on the Dublin 15 area does not come within the scope of the LAP.
- (b) The car park has been designed to serve Kellystown Cemetery. Consideration of other uses of same would be premature until such time as the car park becomes operational.
- (c) The extent of the LAP lands has been established by the Fingal Development Plan 2017-2023. The Old School House at Porterstown is privately owned and is located north and outside of the statutory boundaries relating to the Kellystown Local Area Plan and is separated from same by the Royal Canal (RPS 944a) and the Dublin Maynooth rail line. The vision for the Old School House is set out under Objective 18 Blanchardstown of the Fingal Development Plan. A Strategic Housing Development with regard to the site is currently before An Bord Pleanála for determination.
- (d) The Planning Authority is cognisant of guidance from the Department of Housing, Local Government and Heritage with regard to the effect of National Level 5 Covid-19 Restrictions on the Planning System. The Department published a 'Frequently Asked Questions' guide on the 22nd of October 2020 with regard to the impacts on statutory planning timelines. Guidance with regard to planning applications, appeals, judicial review procedures or development plans, remain unaffected including all statutory periods and timeline. Having regard to the restrictions on movement, the Planning Authority

employed an extensive range of measures to consult with the local community including the following:

- The distribution of over 7000 no. leaflets to households in the area.
- Numerous advertisements in the Dublin Gazette.
- Radio adverts and interview with Charlie Kurtz on Phoenix FM
- The hosting of webinar events to discuss the draft LAP
- Advertisement on social media- Twitter/Facebook
- Stakeholder engagement contact by letter, e-mail and meeting.
- Contact with community groups on the Public Participation Network
- Presentations to Blanchardstown/Mulhuddart/Castleknock/Ongar Committee Meetings.

(e) Directive 2002/49/EC relating to the assessment and management of environmental noise (the Environmental Noise Directive–END) is the main EU instrument to identify noise pollution levels and to trigger the necessary action both at Member State and at EU level. In complying with Environmental Noise Directive, Fingal County Council in conjunction with the other Dublin Authorities has drawn up the Dublin Agglomeration Environmental Noise Action Plan December 2018-November 2023 aimed at managing Environmental Noise from Road, Rail and Industrial sources within the Fingal County Council (FCC) administrative area (but excluding noise from aircraft which is dealt with in a separate Noise Action Plan dedicated to the management of Aircraft Noise alone).

Recommendation:

No change

12.0 CLIMATE ACTION, SUSTAINABILITY AND DRAINAGE INFRASTRUCTURE

Submissions received relevant to this section:

FIN C331-16, FIN C331-42, FIN C331-60, FIN C331-93, FIN C331-94, FIN C331-100, FIN C331-102, FIN-C331-108.

Summary of Issues raised:

- (a) Climate action awareness and sustainability credentials of the Plan are broadly welcomed.
- (b) Additional energy efficiency and sustainable infrastructure initiatives should be explored including photovoltaic panels, maximisation of sun and light orientation, examination of microgeneration and community led and owned microgrids together with the omission of fossil fuel use.

- (c) The provision of electric bicycle and car charging points are welcomed. The location of charging infrastructure should have regard to the location of street furniture and should be integrated with same to avoid proliferation.
- (d) Location and maintenance of SuDs/ Green Infrastructure.
- (e) Additional biodiversity measures to protect wildlife are required.

Chief Executive's response:

- (a) Submissions welcoming the extent of biodiversity and climate action measures within the plan are noted.
- (b) Energy efficiency in the built environment is encouraged in the Plan and there will be continued promotion of new and emerging technologies. Objective 4.3 states 'promote the use of renewable energy in all developments.'
- (c) Provision will be made in the Plan for electric bicycle and car charging facilities. Integrated use of such infrastructure with proposed street furniture will be encouraged.
- (d) Location, extent and maintenance of green infrastructure and sustainable drainage features will be examined in detailed under the Development Management process. Full build out of the lands is unlikely to occur over the life of the LAP, thereby ensuring continuity of existing farming enterprises.
- (e) New habitats for wildlife are promoted under Section 8 Green and Blue infrastructure will be promoted in the Plan.

Recommendation:

Amend Objective 7.18 Page 38 Movement and Transport Strategy as follows:

Objective 7.18

Provide on-street and off-street Electric Vehicle and Cycle Charging points *and where feasible integrate charging facilities with proposed lighting infrastructure and/or street furniture.*

In line with recommendations under Section 5.0 of this report, insert new text under Kellystown Link Road- Minimisation of severance effects Section 8 Green and Blue Infrastructure Page 49 as follows:

- *The feasibility of providing a mammal corridor shall be examined during the design stage of the Kellystown road at a point linking the northern and southern SuDs components to allow large mammals such as otters and badgers to travel through the plan lands from north to south (from the Royal Canal to the Liffey Valley via Luttrellstown Demesne).*
- *The installation of bat bricks as part of new buildings to provide for new bat roosting sites as recommended in the Biodiversity for Low and Zero Carbon Buildings: A Technical Guide for New Build (RIBA and BCT 2010) shall be considered for properties*

located along the northern boundary of the Plan lands and in the vicinity of the riparian corridor and SuDs features.

- *The installation of swift boxes as well as nest boxes for house martin, swallow and sparrow on new taller buildings shall be considered in all developments.*

13.0 LAYOUT, DENSITY AND BUILDING HEIGHTS

Submissions received relevant to this section:

FIN C331-01, FIN C331-16, FIN C331-20, FIN C331-42, FIN C331-43, FIN C331-47, FIN C331-58, FIN C331-60, FIN C331-61, FIN C331-62, FIN C331-69, FIN C331-72, FIN C331-84, FIN C331-87, FIN C331-88, FIN C331-89, FIN C331-90, FIN C331-93, FIN C331-94, FIN C331-96, FIN C331-100, FIN C331-101, FIN C331-102, FIN C331-108.

Summary of Issues raised:

- (a) Provision of new homes and phasing in an east west manner is broadly welcomed. New homes should comprise a mix of sizes, tenure with appropriate housing provided for the elderly, mobility impaired, those wishing to upsize/downsize, provide facilities to work from home and should be served with appropriate private open space and car parking. Housing requirements under Part V of the Planning and Development Act should be fulfilled as should the provision of affordable housing. All housing types should conform to the principle of universal design and provision should be made for bi-lingual naming of estates.
- (b) Incorporate smart hubs for remote working.
- (c) Need for compact neighbourhoods/range of densities.
- (d) Clarity required in relation to Building Heights Strategy including that of Landmark Building.
- (e) LAP should exclude co-living accommodation.
- (f) Central Development Area should provide an appropriate level of retail to serve local needs with connections to Clonsilla as a focal point. The level of commercial/retail would appear to be excessive.
- (g) Concerns raised in relation to density and the size/structure of residential blocks indicated within Development Area 1.

Chief Executive's Response:

- (a) Submissions welcoming the provision of new homes and phasing arrangements within the Draft Plan are welcomed. A Key Strategic Aim of the Draft LAP is to *'support the development of a new residential quarter comprising high quality homes with a mix of dwelling types, sizes and tenure'* New homes will be required to provide for a mix of

housing type, designs, tenures, housing for elderly, etc. Housing provision under Part V of the Planning and Development Act 2000 (as amended) and design issues such as private open space, waste collection/recycling, housing design, boundary treatments, bi-lingual naming of estates and the design and quantum of car parking will be examined under the Development Management process and will accord with national guidance and the Fingal Development Plan. All housing types will be required to be constructed to current Building Regulations standards including all requirements with regard to universal access.

- (b) The development of smart hubs/ remote working facilities will be examined within the Central Development Area. (Refer to CER No. 5 which proposes to insert the following text at Section 6.3.1 – Approach to the Development Area. *Facilitate remote working/community hubs to support local employment in the area.*
- (c) Neighbourhood cells are promoted in the LAP with access to through traffic restricted thus providing for enhanced residential environments. E.g. Development Areas will be served by a single access from Kellystown road (with a secondary emergency access) while the remaining streets will be shared surface residential streets. The range of densities provided is in line with national guidance issued from the Department of Housing, Local Government and Heritage and is appropriate given proximity to public transport links and the requirements of the core strategy.
- (d) The Draft LAP does not prescribe building height requirements and all developments will be assessed in accordance with the Guidelines for Planning Authorities on Urban Development and Building Heights published in December 2018, the Fingal Development Plan 2017-2023 and any specific site characteristics/constraints applicable. The identification of a Landmark Building to the east of the LAP lands is to signify the approach to Kellystown and the focus under the Development Management process will be on achieving a high standard of architectural design and expression rather than a specific height.
- (e) Legislation is to come into effect shortly restricting the development of commercial co-living schemes. As such, it is unlikely that co-living developments will form part of the Kellystown LAP lands.
- (f) A modest level of retail and service provision is provided for in the Central Development Area to serve local needs with the primary retail needs of the Kellystown Area served by Clonsilla (Level 4 retail centre) and Blanchardstown (Level 2). Key Objective DA2.10 states to ‘examine the feasibility of providing for pedestrian and cycle links between the Central Development Area and Clonsilla Village via new pedestrian/cyclists bridge over the Royal canal’. Retail provision will also be provided

for in Phase 1 to ensure interim local shopping opportunities pending the development of the Central Development Area.

- (g) Densities proposed are in line with National policy and guidance issued under Section 28 of the Planning and Development Act. The residential blocks shown are indicative and represent one design solution. Alternative design proposals may be brought forward under the Development Management process provided all underlying principles and objectives are complied with.

Recommendation:

No change

14.0 SPORTING & COMMUNITY FACILITIES, OPEN SPACE & GREEN INFRASTRUCTURE PROVISION

Submissions Received relative to this Section:

FIN C331-4, FIN C331-16, FIN C331-20, FIN C331-21, FIN C331-33, FIN C331-39, FIN C331-42, FIN C331-43, FIN C331-47, FIN C331-58, FIN C331-59, FIN C331-60, FIN C331-62, FIN C331-69, FIN C331-72, FIN C331-79, FIN, C331-80, FIN C331-84, FIN C331-87, FIN C331-88, FIN C331-89, FIN C331-90, FIN C331-93, FIN C331-94, FIN C331-96, FIN C331-98, FIN C331-100, FIN C331-101, FIN C331-102, FIN C331-108.

Summary of issues raised:

- (a) Submissions have been received welcoming the provision of primary and post primary schools, proposed active and passive open space, focus on green infrastructure provision, amenity value of the Royal Canal and measures to preserve existing trees and hedgerows.
- (b) Submissions refer to the importance of existing sporting clubs and other recreational amenities within and in close proximity to the Plan lands.
- (c) A need for additional public pitches, all-weather facilities and associated community facilities to cater for existing clubs and other sporting codes is expressed.
- (d) Disproportionate level of open space provided relative to neighbouring areas. Appropriate set-backs from rail line are required in addition to the need for priority quiet spaces.
- (e) Inconsistency between objectives and mapping in relation to the preservation of high value hedgerows and concerns raised that there is an overprovision of open space within the Eastern Development Area. Concerns also expressed in relation to the

requirement to provide a Green Infrastructure Masterplan for Development Areas at pre-planning stage.

- (f) Play areas should be appropriately designed and community gardens, working farm and other similar initiatives would benefit school environmental awareness programmes.
- (g) Additional community facilities required including community creche/childcare facilities, community centre and remote working facilities
- (h) A number of submissions raise concerns in relation to the design, location and demand for Kellystown graveyard and its impact on proposed adjoining pitches.
- (i) Specific requirements of St. Brigid's Lawn community to be addressed.

Chief Executive's Response:

- (a) Submissions received welcoming schools' provision, location and extent of open space, amenities such as play areas and passive open space, green infrastructure provision and protection of existing hedgerows and trees.
- (b) The importance of all sporting and recreational amenities within and in the vicinity of the Plan lands and their contribution to the community are noted. The Plan will be amended to include the Strawberry Beds as an important recreational amenity in the area as well as the sporting and leisure facilities available at Westmanstown.
- (c) The layout represented within the Draft LAP would see the development of sporting facilities to the Eastern Development Area so as to ensure appropriate synergies with existing schools and community infrastructure. The formation, quantum and type of pitches proposed may be achieved in a number of alternative layouts and the lands will be subject to topographical and site survey analysis. St. Mochta's F.C. as a key stakeholder in the Plan is recognised in Section 9 Parks, Open Space and Recreation.
- (d) The quantum and location of zoned open space is derived from the Fingal Development Plan 2017-2023 and is reflected in the layout of the LAP. Open space, both active and passive will be located to the south of the Plan lands. The amenity value resulting from the mix of passive and active open space will be high with a significant proportion laid out as park land / non-active open space with quite spaces. Appropriate set-backs will be provided from rail infrastructure.
- (e) Inconsistencies between Figure 8.5 Valuable Hedgerows- Approximate Locations Identified and Objective 8.8 are addressed by CER No. 7. Development Area 1- Eastern Development Area Figure 6.3 demonstrates an indicative layout for the Development Area with 'green areas' shown indicating the requirement to preserve valuable hedgerows and for drainage/SuDs infrastructure. Appropriate layouts incorporating these key principles will be examined under the Development Management process. The requirement to agree a Green Infrastructure Masterplan (including all areas of passive and active open space) for the entire Development Area at pre-planning stage will be amended to refer to the application site only.

- (f) Community gardens, working farm and other similar community initiatives are promoted in the plan. The design of play areas will be addressed under the Development Management process.
- (g) Appropriate child care facilities will be required under the Development Management process and will be in line with the Childcare Facilities- Guidelines for Planning Authorities and the requirements of the Fingal Development Plan. Remote working/community hubs for local employment and community use are promoted.
- (h) The location, access arrangements, design and boundary treatments of Kellystown cemetery have been approved under Part XI of the Planning and Development Act 2000 (as amended) and it is not proposed to amend same at this time. It is also important to note the layout of pitches is yet to be finalised. Given the separation from existing and proposed schools it is not considered that the facility will impact same.
- (i) St. Brigid's Lawn residents are acknowledged as a key stakeholder in the plan. The accommodation needs of residents living on the site will be reviewed and refurbishment of the existing halting site to provide upgraded service units (including heating systems) will be carried out in line with the requirements of the Traveller Accommodation Programme 2019-2024. The Plan will be amended to include additional text within Section 6.2.2 Key Objectives

Recommendation:

Additional text will be provided in Section 3.12 Recreational Amenity and Open Space Page 10 Section 3 Environmental Issues and Opportunities to refer to sporting and leisure facilities at Westmanstown and the important amenity area of the Strawberry Bed as set out below.

'Currently there is limited active open space provision within the LAP boundary. However, there are a number of other recreational amenities located in the surrounding area. St. Mochta's Football Club is located within the LAP lands. Luttrellstown Golf Club, Castleknock Golf club, ~~and~~ Castleknock Celtic ~~are also located nearby~~ and a range of clubs and leisure facilities at Westmanstown are also located nearby. The Strawberry Beds is also an important recreational area in the vicinity of Kellystown'.

Insert additional text (new bullet point) under Section 6.3.1 Page 25 Approach to the Development in Section 6 Central Development Area as follows:

- *Facilitate remote working/community hubs to support local employment in the area.*
- Amend Objective 10.10 by adding at end *'including remote working spaces.*

Insert additional text (new Key Objective) under Section 6.2.2 Page 23 Key Objectives Section 6 Eastern Development as follows:

DA1.16 Review the accommodation needs of residents of St. Brigid's lawn and refurbish and upgrade the existing halting site to provide upgraded service units (including heating systems) in line with the requirements of the Traveller Accommodation Programme 2019-2024.

Amend text within Phase 1, Phase 2 and Phase 3 Section 12 Phasing of Development as follows:

Agreement of Green Infrastructure Masterplan (including all areas of passive and active open space) for ~~entire Eastern Development Area~~ *the application site* at pre-planning stage.

15.0 TRANSPORTATION AND INFRASTRUCTURE

Submissions received relevant to this section:

FIN C331-6, FIN C331-7, FIN C331-8, FIN C331-11, FIN C331-12, FIN C331-13, FIN C331-14, FIN C331-15, FIN C331-17, FIN C331-18, FIN C331-19, FIN C331-20, FIN C331-21, FIN C331-23, FIN C331-24, FIN C331-25, FIN C331-26, FIN C331-27, FIN C331-29, FIN C331-30, FIN C331-31, FIN C331-32, FIN C331-34, FIN C331-35, FIN C331-36, FIN C331-37, FIN C331-38, FIN C331-39, FIN C331-40, FIN C331-41, FIN C331-44, FIN C331-45, FIN C331-46, FIN C331-47, FIN C331-48, FIN C331-49, FIN C331-50, FIN C331-51, FIN C331-52, FIN C331-56, FIN C331-57, FIN C331-58, FIN C331-59, FIN C331-60, FIN C331-61, FIN C331-62, FIN C331-63, FIN C331-64, FIN C331-65, FIN C331-66, FIN C331-67, FIN C331-68, FIN C331-69, FIN C331-70, FIN C331-71, FIN C331-72, FIN C331-73, FIN C331-74, FIN C331-75, FIN C331-76, FIN C331-77, FIN C331-78, FIN C331-82, FIN C331-83, FIN C331-84, FIN C331-85, FIN C331-86, FIN C331-87, FIN C331-89, FIN C331-91, FIN C331-93, FIN C331-94, FIN C331-95, FIN C331-96, FIN C331-97, FIN C331-99, FIN C331-100, FIN C331-101, FIN C331-102, FIN C331-103, FIN C331-104, FIN C331-106, FIN C331-107, FIN C331-108, FIN C331-109, FIN C331-110.

Summary of issues raised:

- (a) A significant number of submissions link the Kellystown LAP to the DART+West project including proposals for the construction of a road bridge at Coolmine Riverwood /Stationcourt with associated dis-amenity and impact on neighbouring areas.
- (b) A number of submissions make reference to the use by Irish Rail of a Railway Order.
- (c) A rail station is not required at Porterstown. A new rail station to serve Coolmine should be provided under Dr. Troy Bridge instead with parking in the Kellystown LAP lands.
- (d) Provide a bridge crossing in the Kellystown LAP lands rather than in Coolmine.
- (e) Reference to Coolmine Bridge and any other non-existent transport infrastructure should be removed from the Draft LAP.
- (f) Submissions have been received raising the requirement for a N3-N4 link road.

- (g) A number of submissions request that a Park and Ride facility is provided to serve Clonsilla.
- (h) A number of submissions raise concerns in relation to Kellystown Road.
- (i) Concerns are raised that the Draft LAP is contrary to Objectives contained within the Fingal Development Plan including Objective PM26 PM37, PM64, PM66, PM69, and Objectives 130, 131, 137, 141 and 142.
- (j) Reference is made to previous map-based objectives contained in earlier Development Plans.
- (k) Compliance with Local Objective 144 in relation to the character of Luttrellstown Road.

Chief Executive's Response:

- (a) Whilst development in Kellystown will benefit from the enhanced service delivery offered by Dart+West, it is not contingent on its delivery or on any individual infrastructural components forming part of same including proposals for a new bridge at Coolmine/Stationcourt. Traffic from Kellystown is not at a level that requires mitigation in Coolmine. The infrastructural requirements of the Plan and detailed phasing arrangements are as set out in Section 12 of the Draft LAP. The build out of development within the Plan lands is not linked to the delivery of the DART +West programme as confirmed in the submission received from Irish Rail.
- (b) The LAP does not require a Railway Order. Certain works by Irish Rail are categorised as Strategic Infrastructure Developments (SID) and Iarnród Éireann must apply directly to An Bord Pleanála for permission.
- (c) The NTA has advised that there are no proposals for a train station at Porterstown. Irish Rail has indicated that its DART expansion programme does not preclude advancement of a station in the future at this location. While the Light Rail Corridor has not been included in the Government's Capital Programme and does not form part of the NTA's Greater Dublin Area Transport Strategy 2016-2035, a significant amount of preliminary design work has already been carried out and it is considered prudent to retain the corridor free from development as addressed in Objective DMS122 of the Development Plan. The identification of appropriate locations to accommodate rail stations and the provision of such infrastructure is a function of NTA/Irish Rail.
- (d) As part of a concurrent project undertaken by Fingal County Council, the Planning Authority has undertaken a two-stage options assessment of the preferred route options for Kellystown Road. This examined nine alternative route options. The emerging preferred route- Option 3 providing for a crossing of the Royal Canal and the Dublin Maynooth Rail line at Barberstown provides the optimum location for the required road

bridge and an appropriate link with approved strategic road infrastructure - Barnhill Ongar road. There is no requirement for a vehicular bridge crossing within the LAP lands.

- (e) References to Coolmine Bridge and Emerging Preferred Route at Coolmine Station contained within the Draft LAP are contextual only and are shown in reference to proposals by other agencies in the environs of the Plan lands.
- (f) The provision of a link between the N3 and the N4 is outside the scope of the LAP.
- (g) NTA has set up a Park and Ride office, the function of which is to identify the Park and Ride requirements across the entire Greater Dublin Area (GDA) in the context of existing and planned investment in public transport. There are no proposals in Kellystown as it would not be an efficient use of zoned lands within proximity to the rail corridor. However, it is advised that pedestrian and cycle routes to the train station are improved as well as additional cycling parking at stations.
- (h) Under a concurrent project undertaken by Fingal County Council, the Planning Authority has undertaken a two-stage options assessment of preferred route options for Kellystown Road. This comprised an initial non-statutory public consultation phase. Submissions received will inform the detailed design of the road which will be developed as the design stage progresses and that design will form part of the statutory consultation phase. All issues raised in relation to the impacts of the roadway on particular properties, onward and extended connectivity to locations outside the Plan lands, boundary treatments and detailed design issues will be taken into consideration by the project team.
- (i) The Local Area Plan is in full compliance with the Fingal Development Plan and with all Local Objectives pertaining to the Plan lands. CER 4 recommends the insertion of a new paragraph in Section 7.1 – Relevant Planning and Policy Documents of Section 7 Movement and Transport Strategy to expand on compliance with Local Objective 130.
- (j) Map based Local Objectives pertinent to earlier Development Plans are not applicable or relevant.
- (k) Compliance with Local Objective 144 in relation to the character of Luttrellstown Road is complied with. Kellystown road will provide east-west connectivity through the Plan lands and cycle and pedestrian connectivity will be significantly enhanced. Hedgerows and trees along Luttrellstown Road will be preserved.

Recommendation:

Figure 7.11 – LAP Walking and Cycling Network Page 40 Section 6 Movement and Transport Strategy will be updated to clearly illustrate the link to Clonsilla Train Station

16.0 PERMEABILITY AND CONNECTIVITY

Submissions received relevant to this Section:

FIN C331-3, FIN C331-07, FIN C331-16, FIN C331-20, FIN C331-21, FIN C331-23, FIN C331-29, FIN C331-31, FIN C331-33, FIN C331-47, FIN C331-53, FIN C331-56, FIN C331-57, FIN C331-58, FIN C331-60, FIN C331-61, FIN C331-62, FIN C331-69, FIN C331-88, FIN C331-93, FIN C331-94, FIN C331-100, FIN C331-101, FIN C331-102, FIN C331-103, FIN C331-108, FIN C331-110.

Summary of Issues raised:

- (a) Broad welcome for the extent of cycle and pedestrian connectivity throughout the Plan lands. Concerns are raised in relation to the provision and quality of onward connections and request improved pedestrian, cycle and bus connections to Clonsilla and Coolmine stations and further afield including to Porterstown Park, Westmanstown, Strawberry Beds and to the Royal Canal Greenway.
- (b) Concerns have been raised in relation to closure of existing level crossings.
- (c) Submissions raise concerns in relation to Luttrellstown Road and its perceived function as a support road for M50. Submissions were also received relating to the need to ensure compliance with Local Objective 144.
- (d) Appropriate design standards for roads, cycle ways and layouts must be adhered to.
- (e) Concerns raised that access arrangements to the schools are inappropriate and unrealistically focus on walking and cycle access. Also need to ensure appropriate car access and access to those with mobility impairments - Plan is insular in its approach in terms of access from areas outside Plan lands and by those who are mobility impaired.
- (f) Additional cycling facilities at train stations are required.
- (g) Appropriate directional signage required to facilities located outside of the Plan lands.

Chief Executive's Response:

- (a) It is an objective of the LAP to provide the required pedestrian and cyclist links to/from the LAP lands to external destinations, including Clonsilla and Coolmine stations, Clonsilla Village, external schools, parks and neighbourhood areas. Objective 7.5 of the Plan seeks to 'provide safe walking and cycling links to Clonsilla Rail Station'. Figure 7.11 will be updated to clearly illustrate the links to Clonsilla and Coolmine Train Stations. The Kellystown area will be served by the L52 on the Clonsilla Road (or future route to be determined) and the P65 and 34 on the Diswellstown Road. The NTA identify Clonsilla Road as a secondary level cycle route within the GDA Network plan. The Local Authority will work with the NTA to implement improved pedestrian and cycle facilities along this street. In addition, the Local Authority plan to procure

consultants to prepare a feasibility study/design to examine a cycle route from Clonsilla station to Damastown and also a link to the existing cycle-network on Clonsilla Link Road in 2021. The preliminary design being prepared for the Royal Canal Urban Greenway would provide a cycle route from Clonsilla station eastwards and westwards along the northern side of the Royal Canal. It is intended that an application for planning for the project will be made during 2021. Extensions to the cycle network will be kept under review.

- (b) The LAP continues to support Local Objective 137, 'to preserve the existing pedestrian and vehicular right of way at the level crossing at Porterstown' as set out in Section 7.1 of the Draft Plan.
- (c) Traffic from the LAP lands in an east west direction will be facilitated by the Kellystown Road -from the Diswellstown Road connecting to the Ongar Barnhill Road to the west. This will relieve Luttrellstown Road to the south and will ensure compliance with Local Objective 144 'protect the rural character and setting of the Luttrellstown Road and enhance its use for pedestrians and cyclists'.
- (d) The cycle network will be designed in accordance with the NTA's National Cycling Manual and will provide sufficient widths to accommodate the safe passage of cyclists. It is noted that cargo bikes require additional space for secure cycle parking and this will be supported in the LAP. All accessible parking spaces will be to Irish Wheelchair Association guidelines.
- (e) The proposed school campus is situated centrally within the Plan lands and caters for a range of transport modes. The Central Development Area will be served by a network of pedestrian and cycle links which will also serve and benefit the existing schools complex to the south east. Given the potential volume of cyclists attending the schools, appropriate design with priority afforded to pedestrians and cyclists is proposed in line with the School Streets principle set out in the LAP. Access to the schools' campus from outside the Plan lands will be available via the pedestrian and cycle routes as well as by car. The detailed design of the schools' campus / civic square will examine proposals for set down to cater for those who are mobility impaired.
- (f) Objective 7.5 of the Draft LAP recommends the provision of safe walking and cycling links to Clonsilla Rail Station. It is recommended that additional text be included requiring liaison with Irish Rail to provide additional cycle parking at Clonsilla station.
- (g) Directional signage will be provided throughout the plan lands to facilitate ease of movement for residents and visitors.

Recommendation:

Amend Objective 7.5 Section 7.8 Page 38 Movement and Transport Objectives of the Movement and Transport Strategy.

Objective 7.5

Provide safe walking and cycling links to Clonsilla Rail Station *and liaise with Irish Rail in providing additional cycle parking at the station.*

Amend Section 7.7 Parking Strategy -Bicycle Parking Page 37 of the Movement and Transport Strategy to include the following text:

Facilitate appropriate parking spaces for cargo bikes within the Plan lands.

Amend Objective 7.13 Section 7.8 Movement and Transport Objectives to include the following text:

To provide a comprehensive network of pedestrian and cyclist facilities *with appropriate directional signage* within the LAP lands, including crossings and cycle parking as per the Walking and Cycling Facilities Map.

17.0 BACKGROUND ANALYSIS / ENVIRONMENTAL ASSESSMENTS

Submissions received relevant to this Section:

FIN C331-3, FIN C331-6, FIN C331-8, FIN C331-11, FIN C331-12, FIN C331-13, FIN C331-14, FIN C331-15, FIN C331-17, FIN C331-18, FIN C331-19, FIN C331-20, FIN C331-21, FIN C331-23, FIN C331-24, FIN C331-25, FIN C331-26, FIN C331-27, FIN C331-29, FIN C331-30, FIN C331-31, FIN C331-32, FIN C331-34, FIN C331-35, FIN C331-36, FIN C331-37, FIN C331-38, FIN C331-39, FIN C331-40, FIN C331-41, FIN C331-43, FIN C331-44, FIN C331-45, FIN C331-46, FIN C331-47, FIN C331-48, FIN C331-49, FIN C331-50, FIN C331-51, FIN C331-52, FIN C331-56, FIN C331-57, FIN C331-59, FIN C331-61, FIN C331-62, FIN C331-63, FIN C331-64, FIN C331-65, FIN C331-66, FIN C331-67, FIN C331-68, FIN C331-69, FIN C331-70, FIN C331-71, FIN C331-72, FIN C331-73, FIN C331-74, FIN C331-75, FIN C331-76, FIN C331-77, FIN C331-78, FIN C331-82, FIN C331-83, FIN C331-84, FIN C331-85, FIN C331-86, FIN C331-87, FIN C331-89, FIN C331-90, FIN C331-91, FIN C331-93, FIN C331-94, FIN C331-95, FIN C331-96, FIN C331-97, FIN C331-99, FIN C331-100, FIN C331-101, FIN C331-102, FIN C331-103, FIN C331-104, FIN C331-106, FIN C331-107, FIN C331-108, FIN C331-110

Summary of Issues raised:

- (a) A number of submissions raise concerns in relation to reliance on the Maynooth Line Transport Study prepared by Irish Rail in support of the DART + West proposals and request that an independent survey for Kellystown is undertaken.

- (b) Submissions request that full consideration is given in the Plan to wider environmental impacts including on living conditions, human beings and flora and fauna.
- (c) A number of submissions have raised concerns in relation to the impact of traffic on the wider area; the cumulative impacts of traffic from development, the impacts of construction traffic and impacts on school safety. Submissions also raise concerns in relation to the underestimation of traffic impacts arising from the Plan.

Chief Executive's Response:

- (a) A strategic assessment of the site was firstly performed using the National Transport Authority's Eastern Regional Model (ERM). This is a regional model covering the entire eastern region (Dublin, Kildare, Meath, Wicklow etc.) and is therefore capable of assessing the regional impacts (as well as local impacts) likely to arise from the LAP. The ERM represents the most appropriate tool for assessing the wider and multi-modal impacts of the Kellystown LAP. Local modelling has also been undertaken using independent traffic count data, providing both a strategic and detailed local assessment of the Kellystown LAP, in the context of the wider planned growth in the Fingal area. The Kellystown LAP does not rely on the Maynooth Line Transport Study prepared by Irish Rail in support of the DART + West proposals.
- (b) A significant number of baseline surveys have been carried out to inform the Draft LAP including Habitat and Flora Surveys, Hedgerow Appraisal as well as Bat and Bird Surveys. Environmental Assessments including Screening for Strategic Environmental Assessment and Screening for Appropriate Assessment. Detailed Sustainable urban Drainage System analysis and Flood Risk Assessment have also informed the plan. Proposals for specified classes of development listed in the EIA Directive will be required to undertake Environmental Impact Assessment in line with the provisions of the Directive, as transposed, as part of the development management process. In addition, all planning applications must have regard to the requirements of the Traffic & Transport Assessment Guidelines (2014) published by National Roads Authority (NRA) now Transport Infrastructure Ireland (TII) in determining whether the need for a Traffic Impact Assessment arises.
- (c) Detailed analysis of traffic impacts on surrounding areas has been undertaken. See response to (a) above. In addition, the proposed school campus is situated centrally within the Plan lands and will be served by a network of pedestrian and cycle links. In line with Fingal County Council's approach to school traffic management which aims to improve road safety and air quality around schools, shared parking facilities at a desirable and feasible walking distance (500m) from schools will be provided, thus lowering pollution in proximity to schools. The design of road crossings and the submission of Construction and

Environmental Management plans will be addressed through the Development Management process.

Recommendation:

No change

18.0 PHASING OF DEVELOPMENT AND PLANNED SERVICES

Submissions received relevant to this Section:

FIN C331-42, FIN C331-58, FIN C331-61, FIN C331-62, FIN C331-69, FIN C3321-72, FIN C331-80, FIN C331-87, FIN C331-93, FIN C331-94, FIN C331-108

Summary of Issues raised:

- (a) Residential development within the Kellystown lands should be linked to the upgrades to the rail network and other transport infrastructure
- (b) Schools must be provided in a timely manner. Concern raised that housing in phase 1 will not benefit from school provision until the second phase.
- (c) Delivery of open space, sporting facilities and drainage infrastructure.

Chief Executive's response:

- (a) Whilst the LAP will benefit from the enhanced service delivery offered by Dart+West, it is not contingent on its delivery or on any individual infrastructural components forming part of same including proposals for a new bridge at Coolmine. The infrastructural requirements of the Plan and detailed phasing arrangements are as is set out in Section 12. The build out of development within the Plan lands is not subject to the delivery of the DART +West programme as confirmed in the submission received from Irish Rail. Kellystown road, when completed, will connect to the wider strategic road network including proposed road infrastructure serving Ongar Barnhill Road. The Phasing Plan is set out in Section 12 and requires that Kellystown Road must be completed prior to the development of Phase 2 and 3 and junction upgrade works to the Diswellstown/Kellystown road must be carried out as part of Phase 1.
- (b) Detailed phasing arrangements in relation to the Draft LAP are set out in Section 12 of the document. School sites have been set aside in the Central Development area at a key focal point adjacent the civic square. The delivery of the schools is contingent on the Capital Works Programme of the Department of Education and Skills The Phasing arrangements require that reservation of land for the provision of a primary school to

be made available to the Department of Education and Skills within the initial stage of development and prior to the occupation of the first dwelling house unless otherwise agreed with the Planning Authority following an educational needs assessment of the area to be undertaken by the applicant in consultation with the Department of Education and Skills. There is a requirement for the reservation of land to serve a post primary school also to be made available to the Department.

- (c) Phasing with regard to the delivery of residential development is set out in Section 12 of the Plan and there is a requirement that all Class 1 open space generated by proposed schemes is provided on lands zoned Open Space to the south of the land bank. Active open space is focused within the Eastern Development Area to benefit from proximity to existing and proposed schools and ensure appropriate synergies. The delivery of active open space and the re-location of St. Mochta's F.C. are specifically addressed in Section 9 of the Plan and are required to be delivered in a timely manner to facilitate the re-development of the existing club grounds for residential use. The delivery of drainage Infrastructure, including water and foul drainage provision is set also set out in Section 12.

Recommendation:

No change.

PART D

SUMMARY OF RECOMMENDED AMENDMENTS TO DRAFT LOCAL ARERA PLAN:

CHIEF EXECUTIVE'S AMENDMENTS

CER 1 Insert new paragraph after paragraph two, page V of the LAP as follows:

Where there is any discrepancy between the LAP and the relevant statutory Development Plan, the written statement and corresponding maps and appendices of the Development Plan in force at the time will take precedence.

CER2 Amend the following text at Page V, Section entitled Public Consultation as follows:

Delete existing paragraph on public consultation ~~(In June 2019, Fingal County Council published a Strategic Issues Paper for Kellystown. The consultation period ran for 6 weeks concluding on 31st July 2019. A total of 21 no. submissions were received during this time, each of which has been considered in the making of this Draft LAP. A public drop in~~

~~information session was held at the Blanchardstown Civic Centre on 3rd July 2019 as part of the public consultation activities and was well attended)~~ and replace with the following text

Pre-draft public consultation, which included a Strategic Issues Paper, was held in 2019 and informed the Draft LAP. Public consultation on the Draft Plan was between (17th September and 6th November 2020). Taking account of COVID 19, the consultation period exceeded the statutory requirements and included extensive awareness raising through a range of platforms including a number of display locations throughout the County, print media, social media, radio, virtual meetings, webinars and leaflet drops.

CER 3 Delete Section 1.4 of the Draft LAP

~~In June 2019, Fingal County Council published a Strategic Issues Paper for Kellystown. The consultation period ran for 6 weeks, concluding on 31st July 2019. A total of 21 no. submissions were received during this time, each of which has been considered in the making of this Draft LAP. A public drop in information session was held at the Blanchardstown Civic Centre on 3rd July 2019 as part of the public consultation activities and was well attended. Submissions generally related to the following issues:~~

- ~~• Transport and movement, including the electrification of the Maynooth railway line and removal of level crossings;~~
- ~~• Retail and economic development, including the scale of development and size of individual units given proximity to Clonsilla Village and Blanchardstown Shopping Centre;~~
- ~~• Population and housing – unit mix, densities, variety of housing types and formats;~~
- ~~• Open space and recreation – future uses and amenities as well as current Annex 1 designation;~~
- ~~• Approved burial ground – availability of space for Muslim Community;~~
- ~~• Active open space – location of redeveloped St. Mochta’s grounds;~~
- ~~• Building design – height, layout, and quality;~~
- ~~• Green infrastructure – protection of trees and hedgerows and reuse for amenity value;~~
- ~~• Education provision of school spaces as well as number and location of schools;~~
- ~~• Climate change and sustainability – importance of building sustainable communities which are energy efficient and which facilitate walking and cycling; and~~
- ~~• Infrastructure including the servicing of existing properties in the area.~~

Provide new updated text in paragraph 1.4 as follows:

A series of preparation and consultation stages were taken in advance of the Kellystown Local Area Plan, including Pre-Draft Consultation and publication of a Draft LAP.

Pre-Draft Consultation

A Strategic Issues Paper was prepared and published to help inform pre-draft publication consultation, which took place in June 2019. A number of key issues were raised which helped to shape and inform the Draft LAP.

Draft LAP

A Draft LAP was published and consultation took place between 17th September and 06th November 2020. A total of 109 no. submissions were received during this period of public consultation including submissions from prescribed bodies, landowners, community groups, organisations and individual members of the public. Print media and social media were also used extensively. The issues raised in the submissions have informed the making of the Local Area Plan together with a series of other consultations with stakeholders. The draft Local Area Plan was also available for viewing in a number of public offices and locations throughout Fingal. The content of the Draft LAP was also informed by other key requirements, such as Flood Risk Assessment, baseline ecological surveys and studies and Strategic Environmental Assessment and Appropriate Assessment Screening.

CER 4 Insert new paragraph examining Objective 130 under paragraph entitled Fingal Development Plan 2017-2023 Section 7.1 Relevant Planning and Policy Documents Movement and Transport Strategy.

Objective 130

To fulfil the requirement of Objective 130, the Planning Authority as part of an examination of proposals for Kellystown Road, has undertaken a two-stage options assessment to determine the preferred route. This included the preparation of a Stage 1 Route Options phase which identified a do-nothing option together with nine alternative route options. The emerging preferred route- Option 3 providing for a crossing of the Royal Canal and the Dublin Maynooth Rail line at Barberstown provides the optimum location for the required road bridge and an appropriate link with approved strategic road infrastructure- Barnhill Ongar road which will serve the developing areas of Barnhill and Hansfield SDZ as well as the wider hinterland.

CER 5 Insert the following text under Section 6.3.1 Approach to the Development Area (new bullet point)

- *Facilitate remote working/community hubs to support local employment in the area.*

CER 6 In the 2nd paragraph 3rd column page 29 remove name of consultants ~~Clifton Scannell Emerson Associates~~ and replace with *consultants*.

CER 7 To ensure consistency with Figure 8.5 amend the text of Objective 8.8 to read as follows:

The following hedgerows/treelines shown on Figure 8.5 shall be retained: ~~H1,~~ H2, H5, ~~H6, H7,~~ H8, ~~H9, H10,~~ *H12*, H13, ~~H15,~~ H16, ~~H17,~~ and ~~H19,~~ except were required to facilitate the construction of the Kellystown Link Road.

CER 8 Amend DA1.8 Section 6 Eastern Development Area Page 23 ‘Provide for temporary land uses ~~such as live work units~~ to the north-east portion of land in order to preserve the land for a future transport node at this location.

CER 9 Printing Error: Annotated text ‘Upgraded Level Crossing’ north of Western Development Area Figure 5.2 Kellystown Opportunities in Context Vision and Development Strategy Page 19 amended to read **Existing level Crossing**.

Section 3 Environmental Issues and Opportunities

No. 1 Amend the text in Section 3.4 Page 8 Water & Wastewater Section 3- Environmental Issues and Opportunities as follows:

‘The Irish Water Capital Investment Programme includes the Greater Dublin Drainage Project which seeks to provide a new regional wastewater treatment facility and the associated infrastructure to serve the growing population of the Dublin area. ~~Irish Water forecasts that the project will be complete by 2024.~~ **Irish Water forecasts that the completion date of 2024 may be subject to change.**

No. 2 Additional text will be provided in Section 3.12 Recreational Amenity and Open Space Page 10 Section 3 Environmental Issues and Opportunities to refer to sporting and leisure facilities at Westmanstown and the important amenity area of the Strawberry Bed as set out below.

‘Currently there is limited active open space provision within the LAP boundary. However, there are a number of other recreational amenities located in the surrounding area. St. Mochta’s Football Club is located within the LAP lands. Luttrellstown Golf Club, Castleknock Golf club, ~~and Castleknock Celtic are also located nearby~~ **and a range of clubs and leisure facilities at Westmanstown are also located nearby.** *The Strawberry Beds is also an important recreational area in the vicinity of Kellystown’.*

Section 4 Climate Change and Environmental Sustainability

No. 3 Section 4 of the Draft Plan – Climate Change and Environmental Sustainability. Insert the following after paragraph two Page 14. *It is a general objective of this LAP to support the achievement of the above key environmental actions and those of any subsequent State of the Environment reports.*

Section 6 Development Areas

No. 4 Amend Objective DA 3.1 to read as follows: Provide for a high quality residential area adjacent to Clonsilla Railway station ~~at the upper end of densities supported across the LAP~~ *providing strong urban form and promote densities commensurate to the proximity to a railway station as per Section 28 Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (May 2009) and any subsequent Guidelines.*

No. 5 Insert additional text (new bullet point) under Section 6.3.1 Page 25 Approach to the Development in Section 6 Central Development Area as follows:

- *Facilitate remote working/community hubs to support local employment in the area.*

No. 6 Insert additional text (new Key Objective) under Section 6.2.2 Page 23 Key Objectives Section 6 Eastern Development as follows:

DA1.16 Review the accommodation needs of residents of St. Brigid's Lawn and refurbish and upgrade the existing halting site to provide upgraded service units (including heating systems) in line with the requirements of the Traveller Accommodation Programme 2019-2024.

Section 7 Movement and Transport Strategy

No. 7 Figure 7.11 Movement and Transport Strategy. The indicative cycle and pedestrian network through the LAP area will be updated to clearly show all the pedestrian and cycle connections with key attractors such as the Clonsilla and Coolmine train stations, the bus services on Diswellstown Road, the district centre at Clonsilla and other residential areas and schools.

(Note: Annotated text 'Proposed Footbridge' north of the Western Development Area Figure 7:11 Page 40 removed- printing error).

No. 8. Insert new objective after Objective 7.22 Page 38 Movement and Transport Strategy

Objective 7.23 'Ensure a universal design approach to the built environment including footpaths, roads, pedestrian crossing points and bus stops shelters to ensure access for all'.

No. 9 Figure 7.11 Page 40 Movement and Transport Strategy will be updated to clearly illustrate links to Clonsilla Train Station.

Figure 7.11 Page 40 Movement and Transport will be updated to reflect the proposed cycle provision on each route.

No. 10 Insert additional text under Section 7.6 LAP Internal Walking and Cycling Links Page 36
Section 7.6 Movement and Transport Strategy: *The internal links of the Kellystown LAP have been designed to maximise permeability for pedestrians and cyclists. Pedestrian and cyclist facilities are provided along the road network in addition to a series of interweaving greenways. In addition, filtered permeability for cyclists and pedestrians will be provided between the three main development areas where it will not be feasible to drive from one development area to the other without exiting onto the Kellystown Road, however it will be feasible to walk or cycle internally between the cells via a series of internal paths and greenways.*

No. 11 Amend Objective 7.5 Section 7.8 Pg 38 Movement and Transport Objectives of the Movement and Transport Strategy. Provide safe walking and cycling links to Clonsilla Rail Station *and liaise with Irish Rail in providing additional cycle parking at the station.*

No. 12 Amend Section 7.7 Parking Strategy- Bicycle Parking Page 37 of the Movement and Transport Strategy to include the following text:
Facilitate appropriate parking spaces for cargo bikes within the Plan lands.

No. 13. Insert the following text under Section 7.7 Parking Strategy -Residents Car Parking Page 37 Movement and Transport Strategy:
Consideration should be given to the provision of basement car parking in higher density residential schemes.

No. 14 Amend Objective 7.13 Section 7.8 Movement and Transport Objectives to include the following text:
To provide a comprehensive network of pedestrian and cyclist facilities *with appropriate directional signage* within the LAP lands, including crossings and cycle parking as per the Walking and Cycling Facilities Map.

No. 15 Amend Objective 7.18 Page 38 Movement and Transport Strategy as follows:
Objective 7.18 Provide on-street and off-street Electric Vehicle and Cycle Charging points *and where feasible integrate charging facilities with proposed lighting infrastructure and/or street furniture.*

No.16 Under Section 7.3 Demand for Travelling- Modelling Analysis Conclusions Movement and Transport Strategy Page 32, insert the following additional text at the end of the first paragraph;

It is important to note that the presented mode shares are not a target but a reflection of the potential mode share for the site based on the provided infrastructure. Given the proximity of the site to existing and future bus and rail services, the substantial

investment in walking and cycling infrastructure and proposed supporting mobility management and parking demand management measures; it is envisaged that a greater level of sustainable trip making will take place at Kellystown.

Section 8- Green and Blue Infrastructure

No. 17 Insert new text under 'Kellystown Link Road- Minimisation of severance effects Section 8 Green and Blue Infrastructure Page 49

- *The feasibility of providing a mammal corridor shall be examined during the design stage of the Kellystown road at a point linking the northern and southern SuDs components to allow large mammals such as otters and badgers to travel through the plan lands from north to south (from the Royal Canal to the Liffey Valley via Luttrellstown Demesne).*
- *The installation of bat bricks as part of new buildings to provide for new bat roosting sites as recommended in the Biodiversity for Low and Zero Carbon Buildings: A Technical Guide for New Build (RIBA and BCT 2010) shall be considered for properties located along the northern boundary of the Plan lands and in the vicinity of the riparian corridor and SuDs features.*
- *The installation of swift boxes, as well as nest boxes for house martin, swallow and sparrow, on new taller buildings shall be considered in all developments.*

Section 9 Parks, Open Space and Recreation

No. 18 Include new objective on Page 55 Chapter 9 – Parks, Open Space and Recreation as follows *Objective 9.15 'All landscaping and planting proposals shall include appropriate measures to implement the All-Ireland Pollinator Plan.'*

Section 10- Creating Communities

No. 19 Amend Objective 10.10 Section 10 Creating Communities by adding the following text at end *'including remote working spaces*

Section 11- Water and Infrastructure Services

No. 20 Insert new objective 11.20 after objective 11.19 page 65 of the LAP as follows:

Objective 11.20 Detailed hydraulic modelling shall be carried out as part of Site-Specific Flood Risk Assessments, as required and renumber subsequent objectives in this chapter accordingly as 11.21 to 11.24

Section 12 Phasing of Development

No. 21 Amend Section 12 Phasing of Development Page 67 to include:

Provision of all necessary infrastructure to connect the development area to water supply infrastructure and all necessary connections shall be delivered in tandem with new development

No. 22 Amend text within Phase 1, Phase 2 and Phase 3 Section 12 Phasing of Development as follows:

Agreement of Green Infrastructure Masterplan (including all areas of passive and active open space) for ~~entire Eastern Development Area~~ *the application site* at pre-planning stage.

PART E OVERALL RECOMMENDATIONS:

It is recommended that the Council make the Local Area Plan as amended by passing the following resolution:

That Fingal County Council having prepared and published the draft Kellystown Local Area Plan and having taken into consideration the representations received and having considered the report of the Chief Executive hereby resolves pursuant to Section 20(3)(d) of the Planning and Development Act to adopt the Kellystown Local Area Plan.

Appendix 1

Design Manual for Urban Roads and Streets

Statement of Compliance

Design Principles	Provisions	Statement of Consistency
<p>Integrated Street Networks</p>	<ul style="list-style-type: none"> ▪ Does the development create connected centres that prioritise pedestrian movement and access to public transport? 	<ul style="list-style-type: none"> ✓ The proposed development will significantly improve permeability at this site for the wider community, creating key connections through the site to existing residential communities ✓ The internal road network will prioritise pedestrian movement and has been designed to promote vehicular traffic speeds of 30km/hr or less with narrow lane widths and a strong sense of enclosure. ✓ A number of public transport options are accessible from the site, with direct pedestrian and cycle links to Clonsilla train station.
<p>Movement and Place</p>	<ul style="list-style-type: none"> ▪ Does the development create a legible street hierarchy that is appropriate to its context? ▪ Are the proposed streets connected, maximising the number of walkable / cyclable routes between streets as well as specific destinations both within and external to the Kellystown LAP lands (i.e. community centre, shops, creche, schools etc.)? 	<ul style="list-style-type: none"> ✓ The proposed development will create a legible hierarchy of internal roads that responds to the site context. ✓ The LAP prioritises the movement needs of vulnerable roads users, providing a hierarchy of segregated and protected footway and cycle routes via proposed streets and segregated greenways. ✓ The comprehensive network of pedestrian and cycle routes will provide direct connections from future residential developments to internal schools and communities, as well as external attractions including, amongst others: <ul style="list-style-type: none"> ○ Clonsilla Village

Design Principles	Provisions	Statement of Consistency
		<ul style="list-style-type: none"> ○ Riverwood and Clonsilla residential communities ○ Luttrellstown Community College ○ St. Mochta's National School ○ Clonsilla and Coolmine train station ○ Existing and future bus stops ○ Blanchardstown Centre <p>✓ Vehicular traffic will be regulated through provision of three separate access points into the LAP lands from the proposed Kellystown Road. Vehicular traffic will not be permitted to drive internally throughout the entire LAP lands, however pedestrian and cyclists will experience full permeability through the adoption of filtered permeability.</p>
<p>Permeability and Legibility</p>	<ul style="list-style-type: none"> ▪ Has the street layout been well considered to maximise permeability for pedestrians and cyclists? ▪ Are the streets legible with maximum connection opportunities? 	<p>✓ The layout provides for safe and permeable pedestrian and cycle routes facilitating connection within the proposed development and to the local street network.</p> <p>✓ The concept of filtered permeability for cyclists and pedestrians has been adopted throughout the Kellystown LAP. For example, there are three main development cells situated to the north of the proposed Kellystown Road. It is not feasible to drive from one cell to the other without exiting onto the Kellystown Road, however it is feasible to walk or cycle internally between the cells via a series of internal paths and greenways.</p>
<p>Management</p>	<ul style="list-style-type: none"> ▪ Is the layout designed to self-regulate vehicle speeds and traffic congestion? ▪ Does the proposed layout minimise noise / air pollution wherever possible? 	<p>✓ The proposed internal street network will prioritise pedestrian and cyclist movement and be designed to self-regulate driver behaviour, encouraging speeds of 30km/hr or less.</p> <p>✓ Design of the internal roads has been undertaken to discourage vehicular 'rat running', but maximise permeability for pedestrian and cyclists</p>

Design Principles	Provisions	Statement of Consistency
		<ul style="list-style-type: none"> ✓ The provision of reduced residential car parking, particularly in close proximity to the railway stations, will promote a modal shift toward public transport and away from private car travel. ✓ The emphasis on promoting a modal shift and use of renewable energy will assist with improving air quality.
Speed Control	<ul style="list-style-type: none"> ▪ Does the proposed development balance speed management with the values of place and reasonable expectations of appropriate speed? ▪ Does the design promote a reasonable balance of both physical and psychological measures to regulate speed? 	<ul style="list-style-type: none"> ✓ Vehicle permeability within the scheme is restricted and accordingly traffic volumes and speeds will be minimised. ✓ The creation of a 'Cycle Street' in the centre of the development, in tandem with the 'Schools Street' principle, as well as remote parking areas, will reinforce the priority of active modes in the development, helping to further reduce vehicular speeds.
Streetscape	<ul style="list-style-type: none"> ▪ How does the planned development address the R121, the proposed link road (including the western development area) and Diswellstown Road? ▪ Does the scheme create an appropriate sense of enclosure in addition to a strong urban / suburban structure? ▪ Have street trees and areas of planting been provided where appropriate? ▪ Have active street edges been provided where appropriate? 	<ul style="list-style-type: none"> ✓ A block system of varying heights will create an appropriate sense of enclosure and enhance the urban structure within the site. Lower blocks are concentrated along the site's western and southern boundary where it adjoins existing low-rise dwellings ensuring the development responds sensitively to the established residential neighbourhood. ✓ The proposed scheme incorporates a comprehensive landscape plan that is carefully considered to provide a high-quality response to the redevelopment of this site and has regard to the hierarchy of open spaces proposed within the LAP lands and the biodiversity value of the site. ✓ Each block benefits from ground floor units with own door access to ensure that the internal streets are activated. This will be enhanced by the provision of neighbourhood level retail uses

Design Principles	Provisions	Statement of Consistency
Pedestrian and Cyclist Environment	<ul style="list-style-type: none"> ▪ Are footways of appropriate width provided so as to ensure pedestrian safety? ▪ Have pedestrian crossings, whether controlled or uncontrolled, been provided at appropriate locations? ▪ Are shared surfaces located appropriately in areas where an extension of the pedestrian domain is required? ▪ Have cycle facilities been factored into the design? 	<ul style="list-style-type: none"> ✓ All footpaths within the development site will exceed width minimum requirements and will respond to the needs of the adjoining uses (E.g. wider footpaths outside schools, community areas etc). ✓ All pedestrian crossings will be designed in accordance with the Design Manual for Urban Roads (DMURS) and Streets and the National Cycle Manual and will need to meet the FCC taking in charge specification. Appropriate tactile paving will be provided at all crossing points. Crossing points will reflect the desire lines for both cyclists and pedestrians. ✓ All public realm / shared surfaces will be designed in accordance with DMURS and the FCC taking in charge specification. Appropriate tactile paving will be provided to warn both cyclists and pedestrians of these shared spaces. ✓ Cycle parking will be provided at key external attraction points, including schools, the park, train station etc. ✓ Residential bicycle parking will be provided above the ratio outlined in the Development Plan to encourage more sustainable trip making. The bicycle parking shall be secure and sheltered, and where located at basement level, will be accessed via a segregated cycle access.
Carriageway Conditions	<ul style="list-style-type: none"> ▪ Are vehicular carriageways sized appropriately for their function / location? ▪ Are surface materials appropriate to their application in order to inform drivers of the expected driving conditions? 	<ul style="list-style-type: none"> ✓ Internal roads and carriageways will be designed to reduce vehicular speed and prioritise pedestrian and cyclist movements. Internal roads will vary between 4.8m for shared surfaces and 5.5m for two-way streets and are in accordance with DMURS requirements. ✓ Raised pedestrian/cycle crossings will be provided on the Kellystown

Design Principles	Provisions	Statement of Consistency
	<ul style="list-style-type: none"> ▪ Are junctions designed to balance traffic concerns with the needs of pedestrians / cyclists? ▪ Have adequate parking / loading areas been provided? 	<p>Road junctions (via cycle friendly junctions) as well as on crossing points on internal streets.</p> <ul style="list-style-type: none"> ✓ All surface materials will be specified as per the requirements of DMURS and the FCC taking in charge specification. ✓ The internal road network has also been designed to accommodate circulation of refuse vehicles and emergency vehicles.

Appendix 2

Screening of Recommendations (as provided in Part D of CE's Report) for Appropriate Assessment & Strategic Environmental Assessment.

Proposed Amendment	Outline Description (refer to Part D of this CE's Report)	Screening for Appropriate Assessment (AA)	Screening for Strategic Environmental Assessment (SEA)
CER 1	Amendment provides for clarification on the status of the Draft LAP in the context of the Development Plan.	New text provides clarity. Requirement for Stage 2 AA is excluded.	New text provides clarity. Requirement for SEA is excluded.
CER 2	Amendment provides for clarification on the periods of public consultation in the context of the Covid-19 pandemic.	No AA issues arise. Requirement for Stage 2 AA is excluded.	Amendment provides for clarity on Public Consultation. Requirement for SEA is excluded.
CER 3	Amendment provides for clarification on the preparation of the Draft LAP in the context of submissions received and studies undertaken.	No issues arise. Requirement for Stage 2 AA is excluded.	Amendment provides for clarity on Consultation by way of update. Requirement for SEA is excluded.
CER 4	Amendment provides for clarification on the proposed Kellystown Road, Local Objective 130 and the link to the Barnhill – Ongar Road.	The Kellystown Road project (which is an objective of the Development Plan) will be subject to the Appropriate Assessment process in its own right. Requirement for Stage 2 AA is excluded.	Amendment provides clarification in relation to Objective 130 of Development Plan. Requirement for SEA is excluded.
CER 5	Amendment provides for clarification on the provision of commercial floor space for local community use.	Amendment provides for clarity on local use commercial floor space within proposed development areas. Requirement for Stage 2 AA is excluded.	Amendment provides for clarity on local use commercial floor space. Requirement for SEA is excluded.
CER 6	Amendment deletes reference to particular consultants	Amendment provides for clarity of wording. Requirement for Stage 2 AA is excluded.	Amendment provides for clarity of wording. Requirement for SEA is excluded.
CER 7	Amendment provides for clarification on hedgerows to be protected.	Amendment provides for additional environmental protection. Requirement for Stage 2 AA is excluded.	Amendment provides for clarity to protect hedgerows. Requirement for SEA is excluded.
CER 8	Amendment provides for clarification on the Eastern Development Area.	Amendment provides for clarity by way of update. Requirement for Stage 2 AA is excluded.	Amendment provides for clarity by way of update. Requirement for SEA is excluded.
CER 9	Amendment provides for a 'printing error' and reference to the existing level crossing.	Amendment provides for clarity by way of update.	Amendment provides for clarity by way of update.

Proposed Amendment	Outline Description (refer to Part D of this CE's Report)	Screening for Appropriate Assessment (AA)	Screening for Strategic Environmental Assessment (SEA)
		Requirement for Stage 2 AA is excluded.	Requirement for SEA is excluded.
Section 3	Environmental Issues and Opportunities		
No. 1	Amendment to clarify timescales in relation to the provision of wastewater infrastructure.	Amendment provides for clarity by way of update. Delivery of development remains linked to delivery of key infrastructure. Requirement for Stage 2 AA is excluded.	Amendment provides for clarity by way of update. Requirement for SEA is excluded.
No. 2	Amendment to clarify issues in relation to recreation and leisure facilities.	Amendment provides for clarity by way of update. Requirement for Stage 2 AA is excluded.	Amendment provides for clarity by way of update. Requirement for SEA is excluded.
Section 4	Climate Change and Environmental Sustainability		
No. 3	Amendment to confirm that the Draft LAP will support key environmental actions in relation to Climate Change and Environmental Sustainability.	Enhanced environmental support. Requirement for Stage 2 AA is excluded.	Enhanced environmental support. Requirement for SEA is excluded.
Section 6	Development Areas		
No. 4	Amendments to clarify issues related to urban design, local employment / community hubs and upgrading of existing service units in line with Traveller Accommodation Programme.	Amendments provide for clarity by and enhanced measures in relation to human beings. Requirement for Stage 2 AA is excluded.	Amendments provide for clarity by and enhanced measures in relation to human beings. Requirement for SEA is excluded.
No. 5			
No. 6			
Section 7	Movement and Transport Strategy		
No. 7, 8, 9, 10, 11, 12, 13, 14, 15 16.	Amendments in the context of Movement and Transport in the Draft LAP – the cycle and pedestrian network, access for all, illustration of links to Clonsilla Train Station, internal links, cycle parking, car parking, signage and EV charging, mode shares are not a target but a reflection of the potential mode share for the site. It is envisaged that a greater level of sustainable trip making will take place at Kellystown' - including update to Figure 7.11	Amendments provide for clarity and enhanced pedestrian and cycle permeability and sustainable modes of transport. Requirement for Stage 2 AA is excluded.	Amendments provide for clarity by and enhanced measures in relation to human beings and sustainable modes of transport. Requirement for SEA is excluded.

Proposed Amendment	Outline Description (refer to Part D of this CE's Report)	Screening for Appropriate Assessment (AA)	Screening for Strategic Environmental Assessment (SEA)
	(including printing error on the 'proposed fotobridge).		
Section 8	Green and Blue Infrastructure		
No. 17	Amendment provides enhanced environmental protection, including the provision of corridors for mammal passage through the lands, and the provision of bat and bird boxes.	Amendment provides for additional environmental protection. Requirement for Stage 2 AA is excluded.	Amendment provides for additional environmental protection. Requirement for SEA is excluded.
Section 9	Parks, Open Space and Representation		
No. 18	Amendment provides enhanced environmental protection, ensuring that measures in the All-Ireland Pollinator Plan will be implemented.	Amendment provides for additional environmental protection. Requirement for Stage 2 AA is excluded.	Amendment provides for additional environmental protection. Requirement for SEA is excluded.
Section 10	Creating Communities		
No. 19	Amendment provides for clarification on the provision of remote working space at a local community level.	Requirement for Stage 2 AA is excluded.	Amendments provide for clarity by and enhanced measures in relation to human beings. Requirement for SEA is excluded.
Section 11	Water and Infrastructure Services		
No. 20	Amendment provides for clarification noting requirement for hydraulic modelling to be carried out as part of SSFRAs.	Amendment provides for additional environmental protection. Requirement for Stage 2 AA is excluded.	Amendment provides for additional environmental protection. Requirement for SEA is excluded.
Section 12	Phasing of Development		
No. 21	Amendment provides for clarification on the requirement for provision of water supply infrastructure in tandem with new development.	Amendment provides for delivery of development only with delivery of key infrastructure. Requirement for Stage 2 AA is excluded.	Amendment provides for delivery of development only with delivery of key infrastructure. Requirement for SEA is excluded.
No. 22	Amendment provides for clarification on the provision of green infrastructure within the LAP area.	Amendment provides for clarity. Requirement for Stage 2 AA is excluded.	Amendment provides for clarity. Requirement for SEA is excluded.

