



DUNSINK

CITY QUARTER

DHÚN SINCHE

CEATHRÚ CHATHRACH

**CHIEF EXECUTIVE'S REPORT ON SUBMISSIONS
AND OBSERVATIONS RECEIVED ON THE
DRAFT DUNSINK URBAN AREA PLAN**

September 2026

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1. Introduction

1.1. Chief Executive's Report on Draft Dunsink Urban Area Plan Consultation

This Chief Executive's Report has been prepared in accordance with Section 75 of the Planning and Development Act 2024, as amended to provide a report on the submissions received in relation to the Draft Dunsink Urban Area Plan, to respond to the issues raised in the submissions, and to make recommendations in relation to the proposed plan, taking account of the principles of proper planning and sustainable development of Dunsink, the statutory obligations of Fingal County Council and relevant policies or objectives of the Government or of any Minister of the Government

1.2. Draft Dunsink Urban Area Plan Consultation

The Draft Dunsink Urban Area Plan went on public display from Friday 19th June 2026 to Friday 31st July 2026 (both dates inclusive) at the offices of Fingal County Council in Swords, County Dublin and Blanchardstown, Dublin 15; all Fingal branch Libraries and on the County Council's online consultation portal: <https://consult.fingal.ie/en/browse>. The Draft Plan was also displayed in the Dublin City Council Area Office and library in Finglas.

A total of 1,163 no. submissions were received from members of the public and other interested parties in relation to the Draft Dunsink Urban Area Plan during the public consultation period.

All submissions have been given careful consideration and Fingal County Council wishes to thank all those who engaged in the public consultation process. A list of all persons and organisations who made submissions is included in Appendix A of this report.

1.3. Structure of Chief Executive's Report

This Chief Executive's Report is structured as follows:

- Section 1: Introduction (this section)
- Section 2: A summary of the issues raised in the submissions received from the Minister for Housing, Local Government and Heritage, the Office of the Planning Regulator and the National Transport Authority; the Chief Executive's opinion in relation to the matters raised in those submissions; and, where required, proposed recommendations for amendments to the Draft Dunsink Urban Area Plan.
- Section 3: A summary of the issues raised in other submissions, the Chief Executive's opinion in relation to those issues; and, where required, proposed recommendations for amendments to the Draft Dunsink Urban Area Plan.

- Section 4: A summary list of the recommendations to the Elected Members for amendments to the Draft Dunsink Urban Area Plan (ordered in accordance with the structure of the Draft Dunsink Urban Area Plan document).

With regard to recommended changes to the text of the Draft Dunsink Urban Area Plan set out in Sections 2 and 3, new text is denoted in green e.g. **new text**, with deleted text denoted by red strikethrough e.g. ~~deleted text~~.

Editorial changes and updating of the Draft Dunsink Urban Area Plan will be carried out, such as final numbering of objectives, updating of figures, and minor typographical or graphical errors or discrepancies will be rectified. In addition, all maps, tables and drawings will be updated where relevant to reflect any proposed changes if agreed.

Appendix A contains a list of the persons/organisations who made submissions.

1.4. Strategic Environmental Assessment and Appropriate Assessment Screening

It should be noted that all changes as recommended in this report have been subject to Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) Screening. This is set out in Appendix B 'Screening of recommendations for Appropriate Assessment and Strategic Environmental Assessment'.

2. Submissions received from the Department of Housing, Local Government and Heritage, the Office of the Planning Regulation & the National Transport Authority

2.1. Introduction

In accordance with Section 75(10)(b), (d) and (e) of the Planning and Development Act 2024 as amended, this section of the report provides a summary of the submissions made by the Minister for Housing, Local Government and Heritage and the Office of the Planning Regulator and sets out the opinion of the Chief Executive and recommendations in relation to how the matters raised in the submissions from those agencies and the National Transport Authority should be addressed.

2.2. Submission from Minister for Housing, Local Government and Heritage

FIN-C973-665

Summary of Submission

The submission from the Department addresses a number of issues as follows:

Architectural Heritage

The submission welcomes the plan-led approach to the lands at Dunsink and notes that Chapter 8 of the Draft Plan which relates to Archaeological, Architectural and Cultural Heritage, is very comprehensive, outlines heritage assets in the plan lands in detail which are supported by a number policy objective. It is further considered that architectural heritage is broadly well embedded throughout the remainder of the Plan.

The submission refers to the architectural and archaeological heritage present in the Plan lands, noting that there are significant architectural assets requiring consideration as part of the development of the area. The submission makes 3 no. observations in this regard:

1. It is noted that pitches are proposed to the northeast of Dunsink Observatory. While the Department has no objection to these, it is stated that the provision of floodlighting to these pitches could incur a visual impact on Dunsink Observatory and lands. It is recommended that further consideration to be given to this issue, through the relocation of pitches to a less sensitive location or through policies regarding the use and/or permissible height of lighting standards or the requirement to use retractable flood lighting systems.
2. Reference is made to Chapter 12 which sets out the urban design framework. It is acknowledged that this is a high level guide. However it is stated that it is somewhat difficult to see how it interacts with architectural heritage in terms of designed landscapes, as these are not mapped within the plan. It is stated that it is important to ensure that a level of flexibility is provided in the urban framework to facilitate a tailored design approach to sites which relate to and/or are in close proximity to architectural heritage sites and their associated gardens and parklands.
3. It is stated that it is unclear if any architectural heritage surveys and/or reports were prepared to facilitate the preparation of the plan. It is stated that it would be beneficial if any such documents could be made available to the public by way of appendices to the plan or as supplementary information.

Nature Conservation

Reference is made to the submission made by the Department to Fingal County Council as part of the Strategic Environmental Assessment scoping process. The Department notes and welcomes that the information and suggestions made concerning measures to be adopted in the Urban Area Plan appear to have informed and influenced the content of the plan. The Department, in particular welcomes that its recommendation in respect of maintaining water quality in the stretch of the River Tolka within the Urban

Area Plan area is reflected in the Sustainable Drainage Strategy for Dunsink. It is stated that it is essential that planning authorities when evaluating any planning permissions within the plan area, will only accept schemes in which the SuDS to be installed have been designed in line with the Dunsink Sustainable Strategy.

The Department also welcomes Objective UDF46 in the Urban Design Framework which refers to the requirement for lighting in the Central Development Area to be low impact and designed to minimise disturbance to wildlife on the river corridor and Objective UDF106 in respect of lighting for the Tolka Valley Regional Park.

The submission does highlight concerns regarding potential adverse effects on fauna, flora and habitats of ecological value within the plan area, and especially in Tolka Valley Park and associated with the proposed 'Southern Link Road' along the southern boundary of the Dunsink Central area immediately above the top of the largely wooded northern escarpment slope of the Tolka valley. It is considered that the proposed route will to a great extent cut off terrestrial mammals with dens in the Tolka Valley from the areas to the north over which they currently forage. Light spillage from this road and water runoff from the surface of its carriageways contaminated with hydrocarbons could also detrimentally impact on animal and plant species and habitats of ecological significance downslope from its route in the Tolka Valley Park.

The Department consequently recommends that consideration should be given to re-routing the proposed 'Southern Link Road' further north within the Dunsink Central lands away from the Tolka Valley with residential cul de sacs sited off it backing onto the top of the valley escarpment. It is stated that if such a re-routing is not considered feasible, then its design should include:

- The location of mammal underpasses along it at sites to be determined by surveys of the Tolka valley and the Dunsink lands as a whole for badger setts and activity,
- The minimisation of light spill from it into the Tolka valley to the greatest extent possible, and
- The direction of runoff from its carriageways into constructed wetlands.

Chief Executive's Response

The submission from the Department of Housing, Local Government and Heritage is welcomed, particularly the recognition given to the incorporation of measures the Department had previously raised in their scoping submission into the Draft Plan and the acknowledgement of the comprehensive nature of the archaeological, architectural and culture heritage chapter and that architectural heritage is embedded in the Draft Plan.

The location of the proposed recreational hub has been influenced by the underlying land use zoning which would facilitate this purpose, the objective in the Fingal County Development Plan 2023-2029 to provide a recreational hub in this area and the limitations associated with the former landfill which is located to the west of the proposed recreational hub. It is also considered that the proposed location will promote future use by residents in adjoining areas thereby enhancing its overall community benefit. The concerns expressed regarding lighting in this area are recognised and are acknowledged in the Draft Plan at Section 12.2.7 which relates to the Regional Park and Recreational Hub development area and states that "Particular regard shall be had to the interface with Dunsink Observatory to the south, ensuring that design, public lighting and activity levels are appropriately managed to protect its operational function....".

Section 12.5 of the Draft Plan provides details in respect of lighting within the Plan area which promotes a low impact light approach, particularly having regard to the Dunsink Observatory. The provisions of the Draft Plan have been further examined and it is considered appropriate to amend these to clarify that they relate to all forms of external lighting including commercial, recreational and sports lighting, transport-related lighting, architectural lighting, illuminated signage and other external lighting sources that have the potential to impact on the observatory, biodiversity and environmental quality. Furthermore, additional provisions requiring all development proposals incorporating external lighting to assess potential impacts on light spill, sky glow and the operation of Dunsink Observatory are recommended. This will ensure that lighting considerations are integrated into the design process at an early stage and that the cumulative impacts of external lighting are appropriately addressed.

With respect to the comments relating to Chapter 12, the Draft Plan is a high-level strategic framework for the future sustainable development of Dunsink. Its strategic objectives include, but are not limited to, protecting and integrating the built and natural heritage assets of the area and ensuring that development responds sensitively to the historic and environmental context of Dunsink. Figure 12.12 of the Draft Plan provides a spatial layout overview of the Plan lands, illustrating the location of Protected Structures, Recorded Monuments and other architectural heritage sites. The spatial layout illustrates how heritage features have been sensitively incorporated into the proposed Development Areas, for example the proposed open green space around Elm Green (Protected Structure) in Dunsink West that will protect its setting while integrating it into the new urban quarter. The Project Team involved in the preparation of the Draft included archaeological and cultural heritage consultants and conservation architects in addition to relevant Fingal County Council staff. Background research included desktop studies and field surveys as necessary to inform the preparation of the Draft Plan.

The comments in respect of lighting in the Tolka Valley Park are noted. The Draft Plan supports a sensitive approach to lighting in the Plan area having regard to the heritage and ecological sensitivity present. This approach is referenced in Section 12.5 of the Draft Plan which states that:

“Lighting should operate only when needed. Lighting schemes should incorporate smart controls where appropriate, including:

- Time-based dimming
- Motion sensors.”

Furthermore, Objective UDF114 states “Ensure that lighting levels and design are appropriate to the environmental sensitivity of the surrounding area, particularly within parklands, ecological corridors and areas of lower ambient brightness”.

The detailed engineering design of the Southern Link Road will incorporate sensitive environmental design, including consideration of mammal underpasses/passes, wildlife buffers, low-spill/dark-sky public lighting, and comprehensive SuDS to treat roadway runoff and enhance biodiversity along the Tolka Valley corridor. As noted in the submission received from the Department, the Draft Plan contains extensive provisions relating to sustainable drainage system. As referred to above, there are provisions in the Draft Plan relating to lighting which can be further expanded while Section 7.4 of the Draft Plan states that habitat features shall be included in new building designs and managed landscapes including “Mammal underpasses beneath roads that provide safe wildlife crossing opportunities, maintain habitat connectivity and support the movement and long-term conservation of native mammal populations.”

Chief Executive's Recommendation

Amend objective UDF13 on page 90 as follows:

‘Implement low impact ~~public~~ **external** lighting that minimises light spill and skyglow across the development area in accordance with the ~~public~~ **external lighting** requirements of this Plan.’

Amend objective UDF38 on page 96 as follows:

‘Lighting shall be low impact and designed to avoid glow or light spill in accordance with the **external** lighting strategy for the Plan area.’

Amend objective UDF67 on page 99 as follows:

‘Implement low impact ~~public~~ **external** lighting that minimises light spill and skyglow across the development area in accordance with the ~~public~~ **external lighting** requirements of this Plan.’

Amend Section 12.5 as follows:

Change heading of Section 12.5 to read '~~Public~~ **External** Lighting in the Landscape'

Include additional text at the start of the section as follows:

This guidance and associated objectives relate to external lighting in the landscape including but not limited to public lighting, commercial, recreational, exterior building lighting and signage lighting.

Amend UDF 117 as follows:

UDF117 Planning applications for development proposals which include ~~public~~ **external** lighting shall be accompanied by a detailed ~~public~~ **external** lighting design which shall comply with the principles as outlined in this Plan.

Amend Section 12.5 as follows:

Include two additional objectives in the section as follows (numbering to sequentially follow UDF117 as listed in the Draft Plan):

To require a commensurate lighting impact assessment to be submitted with all applications which include external lighting to assess potential impacts associated with the proposed external lighting design including the minimisation of light spill, glare and sky glow, the protection of biodiversity and residential amenity and the safeguarding of the operational integrity of Dunsink Observatory.

Restrict the use of externally illuminated and digital advertising displays where they would result in unacceptable impacts on dark sky conditions, residential amenity, biodiversity, landscape character or the operation of Dunsink Observatory.

2.3. Office of the Planning Regulator

FIN-C973-606

Summary of Submission

The submission recognises the strategic location of the Dunsink lands and potential to make a substantial contribution to meeting the future housing needs of Dublin city. The submission specifically positively notes and supports:

- The promotion of transport-oriented, design and residential led development;
- The commitment to ensuring that community infrastructure is coordinated with residential development and the integration of such facilities within walkable neighbourhoods;

- The sensitive integration of the area's rich and distinctive built and natural heritage assets into the overall vision for the area; and
- The creation of a new regional park on the site of the former landfill.

The submission notes the requirement for the Urban Area Plan to be materially consistent with the Development Plan and states that future reviews of the zoning framework may present opportunities to enhance connectivity, better integrate new and existing communities, maximise the role of Tolka Valley Regional Park and option the distribution of land uses in support of a more integrated and sustainable urban structure.

The submission makes 3 specific observations which relate broadly to connectivity, density and implementation and monitoring, which are set out further below.

The submission also addresses some of the existing non-residential land use zonings in the Plan area in the Fingal County Development Plan. It acknowledges the legislative requirement for urban area plans to be materially consistent with the relevant development plan and the lack of scope to depart from the zoning provisions set out in the Development Plan. It is, however, stated that this results in constraints or missed opportunities to maximise the opportunities presented by the proximity to existing communities to the south (Castleknock) and west (Ashtown) and the DART rail corridor. It is stated that this particularly relates to the lands currently zoned as High Amenity (proposed to be designed as Tolka Valley Regional Park) and the High Technology zoned lands between the Navan Road and the rail line at Dunsink South. The OPR is of the view that strategic and limited rezoning for residential or mixed-use development purposes should be considered for the High Amenity zoned lands, particularly those in proximity to the Ashtown train station/village centre. The High Technology zoned lands are stated to warrant further consideration for residential or mixed-use purposes.

The Office requests that the Planning Authority gives full consideration to these views in terms of any future review of the zoning objectives.

Connectivity

The submission refers to the spatial strategy of the Draft UAP which aims to minimise through-traffic and prioritise active and public transport. It notes future public transport plans for the area including DART+ West and the Tyrrelstown Luas. It states that presently, there are limited connections from the central development area (Dunsink East, Dunsink Central and Dunsink West) through the proposed Tolka Valley Regional Park to the DART train line. It is stated that further consideration should be given to the opportunity for additional linkages, including potential vehicular/bus routes, between the proposed urban development and Navan Road Parkway train station.

Observation 1 advises the Planning Authority to review the opportunities for further multi-modal connectivity between the development areas of Dunsink West, Dunsink Central and Dunsink East through the proposed Tolka Valley Regional Park to the DART railway line.

Density of Residential Development

The OPR submission references the National Planning Framework First Revision (2025) growth targets and strategy for cities and metropolitan areas, the density guidance in the 'Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities' (2024) (referred to hereafter as the Compact Settlements Guidelines) and the density strategy in the Draft UAP including the specific density ranges proposed for the Dunsink East and Dunsink Central Development Areas. The submission acknowledges that the approach in the Draft UAP appropriately reflects the objectives of the Compact Settlements Guidelines by seeking to balance the efficient use of investment in high-quality public transport with the objective of maximising access to these services for residents. The commitment to achieving densities that support compact growth in highly accessible areas is also acknowledged.

The submission goes on to refer to the content of the Compact Settlements Guidelines which recognise that density outcomes should be considered in the context of placemaking, viability, housing delivery and the wider development of an area. The submission states that the OPR considers that the density approach could be strengthened by providing greater recognition of the practical realities of development delivery and the need for flexibility in how the target density range is achieved over time, and supporting the creation of mixed tenures. It is stated that it should be acknowledged that achieving higher densities is often an incremental process, with reference made to the experience in the adjoining Ashtown/Pelletstown area and the inclusion of a range of densities in the early stages of the development.

Observation 2 advises the Planning Authority to review the provisions made in respect of the density ranges for Dunsink Central and Dunsink East to provide greater flexibility and clarity regarding the density range for individual and early-stage schemes within the relevant overall density ranges.

Implementation and Monitoring

The submission references the need for the development of Dunsink to be coordinated, infrastructure-led and delivered in a planned and sustainable manner. Reference is made to the large scale infrastructure that is needed to support the full build out of the Dunsink lands including the Greater Dublin Drainage Scheme, Water Supply Project and Luas Tyrellstown Extension.

In this context, Observation 3 advises that the UAP should include a detailed phasing and implementation plan for the development lands, supported by indicative timelines and delivery mechanisms and details of monitoring arrangements and review measures that would support the planning authority in actively tracking progress and responding effectively as implementation advances.

Chief Executive's Response

Fingal County Council welcomes the recognition in the submission from the Office of the Planning Regulator (OPR) of the strategic location of the Dunsink lands and potential to make a substantial contribution to meeting the future needs of Dublin city. Variation No. 1 to the Fingal County Development Plan 2023-2029 identified these lands as a critical component in meeting the demand for homes in Fingal in the coming years. The Variation, as adopted on 30th March 2026, committed to the preparation of an Urban Area Plan within the lifetime of the Development Plan. The publication of the Draft Plan on 19th June has delivered on this objective.

The comments in respect of zoning are noted. As referenced in the submission, the Dunsink Urban Area Plan is required to be materially consistent with the zoning objectives of the Fingal County Development Plan 2023-2029. Therefore any change to the current zonings is considered to be outside the scope of the Draft Plan. Any future consideration of zoning will take place in the context of a Development Plan process and have regard to statutory obligations and considerations and the overall proper planning and sustainable development of the area.

The Draft Plan contains a comprehensive movement strategy based on the principle of transport orientated demand and predicated on public transport. Within the short term, proposed bus services and active travel infrastructure will facilitate access from the identified Phase 1 lands to the rail station at Ashtown. The wider walking and cycling network illustrated in the Draft Plan, will facilitate direct connections to the rail stations at Ashtown and Navan Parkway. The Draft Plan recognises that the residential core area of the Plan lands is affected by physical barriers that act as severance points including the Royal Canal. It is a priority of the Plan to address these including with the provision of an active travel bridge across the Tolka Valley Park to the Navan Road Parkway. This will directly link into the active travel loop throughout the Plan lands, addressing the existing severance issue. The bridge can also facilitate public transport usage, as per Objective CM14A of the Draft Plan which states "Support and facilitate the development of active travel infrastructure while providing consideration, where appropriate, for integration of public transport infrastructure." In the interests of clarity, it is considered that the references to the Navan Parkway bridge can be amended to include the potential for public transport usage referenced in Objective CM14A.

The density targets set out in the Draft Urban Area Plan have had cognisance of the content of the Compact Settlement Guidelines, public transport investment committed in this area, particularly in the form of Dart+ West and the need to support future investment in services notable the Luas green line extension. The approach in the Draft Plan is to recognise that the early phase of development in the Plan lands may be at a lower density, supporting a range of housing typologies which will be beneficial in terms of housing mix across the area as a whole, and thereafter densities will increase to support public transport investment. This is incorporated into the strategy for the Dunsink East and Dunsink Central areas.

The Council recognises the need for densities in this area to support the significant investment of public funds that will be made in public transport in this area. However, the Council is also mindful of the current character of the area, other submissions in relation to the scale and density of development across the Plan area (also discussed in Section 3.12 of this report) and the contents of the Compact Settlements Guidelines. It is therefore considered that the density range in the Dunsink East and Central development areas could be amended to range from 50 units in the early phase and the upper limits reduced within the overall density range for 'City – Urban Neighbourhoods' as specified in the Compact Settlements Guidelines.

The comments provided by the OPR in respect of implementation and monitoring are noted. In respect of water services as referred to in the submission, the wider Dublin area is dependent on the Greater Dublin Drainage (GDD Scheme) and Water Supply Project. The provision of adequate water services to deliver on the objectives of the National Planning Framework: First Revision, the NPF Implementation: Housing Growth Requirements and the Eastern and Midland Regional Authority Regional Spatial and Economic Strategy is of national importance. Fingal County Council will continue to liaise with the agencies responsible for delivering on this infrastructure.

In the interim, there is sufficient capacity to cater for the first phase of development of the Dunsink lands. As noted in Objectives SIEF01 and SEIF03, development will only be permitted where there is adequate capacity within the water supply and foul drainage networks and in agreement with Uisce Éireann.

It is acknowledged that the future Luas Tyrellstown extension will represent a defining feature in the Plan lands in terms of urban structure and, particularly for the final, western phase of development, will be an important component in the transport strategy for the area. This is referenced in Section 13.2 of the Draft Plan. The strategy of the Plan requires that an adequate reservation is retained to facilitate the future provision of the line. As noted in the submission received from the OPR, the Draft Plan contains a number of other

significant transport infrastructure proposals in the medium and long term. The Draft Plan also, however, contains proposals for short term measures, particularly to ameliorate the accessibility of the proposed Phase 1 lands to public transport. These include the upgrade of Dunsinea Lane and Scribblestown Lane, for which funding was awarded to Fingal County Council earlier this year under the Housing Infrastructure Investment Fund, and which will provide active travel connection to Ashtown Station. A network of bus services has also been identified. Fingal County Council has engaged with the NTA in developing these proposals.

While the Luas Tyrellstown scheme is currently indicated as a post 2042 project, it is anticipated that the review of the NTA 'Transport Strategy for the Greater Dublin Area, 2022-2042' will commence in 2027. This will represent an opportune time to reconsider the timeframe for delivery of this project. In the meantime, the early phases of the development of the Plan lands are not reliant on the Luas in terms of transport and movement.

Chapter 13 details the phasing programme for the Urban Area Plan. Phase 1 accords with the timeframe for the existing Fingal County Development Plan 2023-2029 and core strategy allocation for the area in that Plan. Thereafter, the quantum of development and associated timeline will be influenced by future development plan policy. It is not considered appropriate to prejudge that process of allocation. Instead, the plan promotes an infrastructure led approach to population growth, identifying the key infrastructural requirements necessary to sustain certain thresholds in housing provision. It is recognised that a multi-agency approach is needed to facilitate the build out of the Plan lands, given their strategic regional importance and having regard to the role that other government and national agencies will play in infrastructure provision. In this regard, Fingal County Council will continue to liaise with the relevant organisations and welcomes their involvement in the implementation of the Urban Area Plan. Housing delivery monitoring occurs on an ongoing basis, through Fingal County Council's contribution to the '4Dublin Housing Supply Pipeline Monitor' report, which is published on a quarterly basis. The Environmental Report which accompanied the Draft Plan also includes monitoring measures. It is considered that the approach set out in the Draft Plan will ensure that the necessary physical and social infrastructure required to serve the area and the needs of its residents can be delivered effectively in line with population growth.

Chief Executive's Recommendation

Amend Section 5.4 as follows:

Navan Road Parkway: This will require a new pedestrian and cycle bridge from Dunsink to the station in order to bridge the severance created by the Royal Canal, **while**

providing consideration for the integration of public transport infrastructure into the design of the structure.

Amend Section 12.2.2 Dunsink Central as follows:

The proposed active travel bridge is a key piece of infrastructure within the Plan area, providing a direct connection between residential areas and the Navan Road Parkway Rail Station. By prioritising walking and cycling, it supports sustainable mobility and integrates the Plan lands with the wider transport network. **Consideration can also be given to the potential integration of public transport infrastructure into the design of this bridge.**

UDF47 The proposed active travel bridge linking to the existing Navan Road Parkway rail station shall be designed as a high-quality and inclusive piece of infrastructure that prioritises pedestrians and cyclists and demonstrating high-quality architectural design, structural form and material finish. **Consideration can also be given to the potential integration of public transport infrastructure into the design of this bridge.** The bridge shall be fully integrated into the surrounding landscape and movement network, ensuring seamless connectivity and universal accessibility. Appropriate and sensitive treatment shall be provided at each landing point with well-designed public realm and strong visual and physical connections into adjoining areas.

Amend text in Section 12.2.1 as follows:

The density of development in this area will range from approximately ~~75~~ **50** to ~~200~~ **150** units per hectare (net) with the lower figure relating to the first phase of development. Thereafter, densities will increase to support public transport investment.

Amend table on P. 91 as follows:

Density Range (Net)	c. 75 50 – c. 200 150 dph
Approximate Unit Range	c.6,500 no. – c.6,800 no. c. 1900 no. – 5,700 no.

Amend text in Section 12.2.2 as follows:

The density of development in this area will range from approximately ~~75~~ **50** to ~~160~~ **140** units per hectare (net) with the lower figure relating to the first phase of development. Thereafter, densities will increase to support public transport investment.

Amend table on P. 96 as follows:

Density Range (Net)	c. 75 50 – c. 160 140 dph
Approximate Unit Range	c.4,250 no. – c.4,550 no. c. 1,600 no. – 4,500 no.

Amend table on P. 99 as follows:

Density Range (Net)	c. 190 120 – c. 220 180 dph
Approximate Unit Range	c.6,750 no. – c.7,050 no. c. 4,000 no. – 6,000 no.

Amend text in Section 12.3 as follows:

The inclusion of the lower range density of ~~75~~ **50** units per hectare (net) is envisaged for the first phase of development with the subsequent phases providing density at the higher level to support high capacity public transport investment.

2.4. National Transport Authority

FIN-C973-455

Summary of Submission

The submission welcomes the publication of the Draft Plan and the engagement of Fingal County Council to date at pre-draft stages. The submission considers that the subject Plan represents an opportunity to provide for plan-led development at this significant site that can be supported by a public transport network and integrated with the surrounding built-up-area. The submission makes specific comments in respect of Luas, bus services and a future transport interchange as set out below.

Luas

The submission welcomes the inclusion of a segregated corridor for a future Luas alignment through the site. It is requested that the local authority engage with the National Transport Authority (NTA) prior to finalising the UAP in order to address a number of issues with respect to the light rail corridor including the width of the alignment, future planning the corridor north of the M50 as part of the wider transport corridor outside of the plan lands, the M50 crossing, road junctions across the corridor and future bridge structures or crossings along the corridor.

It is also stated that the authority should consider the application of general objectives in the UAP that seek to ensure that future development at the site is designed in a manner that does not prejudice the delivery of a future Luas along the identified corridor.

Provision for Bus

The submission refers to the proposed bus services indicated in the Draft Plan. The inclusion of 4 indicative bus routes including an extension of the N6 route from Finglas and the 36 route from Ashtown alongside the potential new local route to Blanchardstown are welcomed. The submission queries the inclusion of the proposed new B5 Spine Bus in the Draft Plan. It is stated that under the BusConnects Network Redesign Plan, the B-Spine service will travel along the Navan Road to Blanchardstown and at present, it is not considered that a further spine service to Dunsink could be accommodated. It is, therefore, requested that this option is removed from future versions of the UAP.

It is also requested that text on P. 28 of the Draft Plan is amended as follows:

Delete *"Bus provision shall be agreed in consultation with the NTA"*

and replace with

"These bus routes will be subject to more detailed planning and design work prior to implementation. This design work will be led by NTA in partnership with FCC. The introduction of bus services will be subject to funding."

It is submitted that potential bus stop locations should be considered and indicated bus stop locations should be shown in the UAP in order to safeguard appropriate locations for bus stops. It is also requested that map based objectives are included for bus terminus infrastructure such as turning loops and laybys. The submission also states that the local authority should seek the future provision of driver welfare facilities in close proximity to any bus terminus points.

The submission addresses road layouts in the context of bus services and notes that it is important that the UAP adequately provides for future bus movements through the site. It is requested that the local authority seek to ensure that the primary street network, including junctions on potential future bus routes, can accommodate the movements of a bus.

Future Transport Interchange

The submission highlights the stated need for space to be reserved for a major additional transport facility at a central location, to ensure that, should a future transport services, additional to bus and Luas Tyrellstown be identified as a requirement to meet the transport demands of this area in the long term, sufficient land will be available to provide for same at a prominent location within the subject area. The submission states that the

requirement for such a site to be reserved will be clarified as part of the upcoming review of Transport Strategy.

Chief Executive's Response

The comments of the NTA are welcomed.

The safeguarding of a future Luas corridor through the Dunsink lands is supported and it is acknowledged that there is a need to ensure that a sufficient reservation is protected to accommodate all aspects of the infrastructure including the overall width, stop infrastructure, structural capacity and route continuity so as not to prejudice delivery of the scheme. This can be reflected in updated text of the Urban Area Plan. The potential M50 crossing point has been re-examined and a modification will be made to the indicative route shown in the Draft Plan to provide for a more favourable alignment. Fingal County Council will continue to liaise with the NTA with respect to the Tyrellstown Luas extension in order to secure the delivery of the project at the earliest opportunity.

Fingal County Council welcomes the positive reaction from the NTA to the inclusion of some of the indicative bus routes proposed in the Draft Plan. The comment regarding the proposed B5 Spine is acknowledged and it is considered that the reference to this route should be removed from the Plan text. It is recognised that additional design and planning work will be required in respect of future bus services. Fingal County Council will continue to liaise with the NTA on this and it is considered that additional text should be included in the Plan in this regard.

The comments regarding bus stop, terminus and operational infrastructure are noted. It is agreed that these should be integrated into the urban structure from an early stage to ensure that future bus services can operate effectively and attractively. The Draft UAP states that provision will be made for bus layby and terminus on a phased basis with dedicated welfare facilities for bus and rail drivers proposed to be provided in the proposed mobility hubs. Additional detail can be provided regarding indicative bus stop locations and bus terminus infrastructure (including turning circles, laybys and driver welfare facilities).

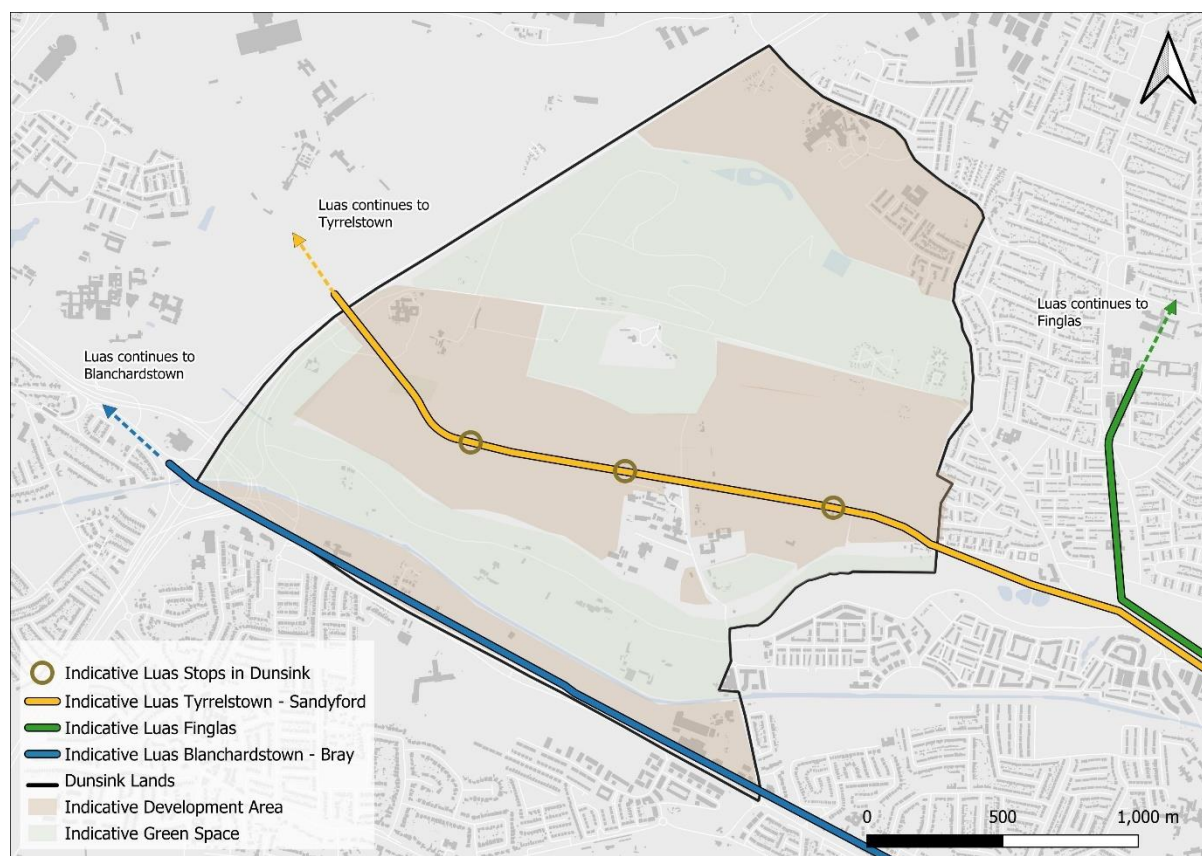
It is recognised that the primary street network needs to be designed to accommodate future bus movements and to allow for extension of the city bus network into and through the Dunsink lands. This approach is consistent with the overall transport strategy developed for the area, which provides for phased bus service enhancements penetrating the core of the development. It is considered that an additional objective can be included to address the issue of the design of the street network.

As set out in the Draft UAP, Fingal County Council supports the provision of the public transport infrastructure necessary to support the sustainable development of these lands. The Council will continue to work with the NTA to secure the delivery of public transport services for this area and will engage with the forthcoming review of Greater Dublin Area transport strategy with regards to the need for additional strategic transport services in this area.

Chief Executive's Recommendation

Amend Figure 5.4 Proposed Public Transport - Light Rail Luas on Page 27 as follows:

Updated indicative Luas alignment route over the M50 to be illustrated (and any other relevant figures within the Draft Plan showing the indicative route alignment) in line with the revised figure below.

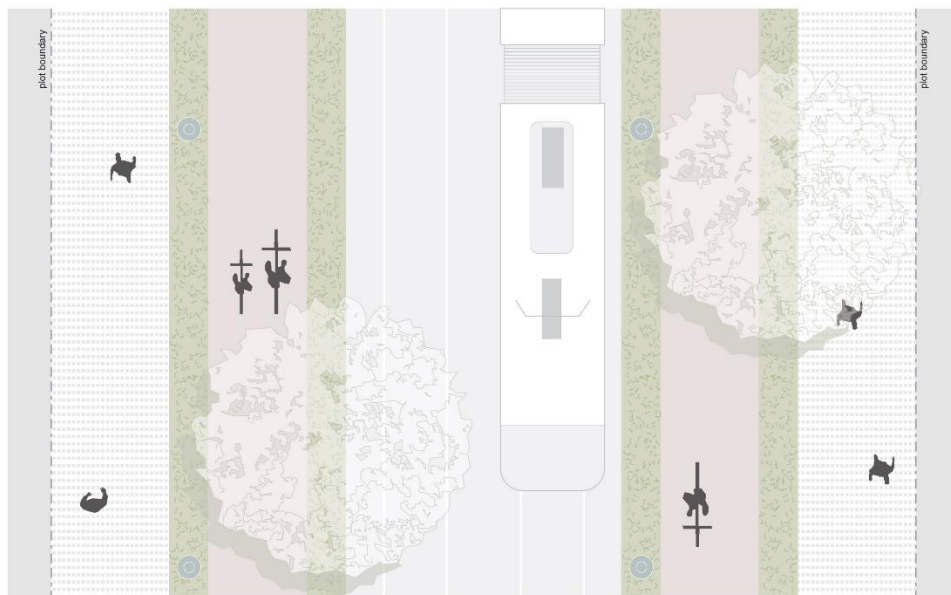


Amend Section 5.4 Proposed Public Transport - Light Rail Luas on Page 27 as follows:

'Design considerations for the future Luas' section to include the following text:

"A minimum width of 8 to 10m should be reserved for a Luas alignment excluding any other active travel or public transport requirements, widened to an 18m width for a length of 70m at stop locations. Road junctions across the Luas corridor should be kept to an absolute minimum. All future bridge structures or crossings along the

Luas corridor should be designed sufficiently to cater for a Luas alignment and Luas loadings. The Luas crossing of the M50 will be located in such a way as to minimise the length of the crossing lengths and subsequent bridge structures, away from any junction and associated slip lanes, to minimise the future bridge length and safeguard the operational requirements of the M50".



Amend Objective CM04 Proposed Public Transport - Light Rail Luas on Page 27 as follows:

CM04: Safeguard and reserve a continuous corridor within the Plan lands for the provision of a future Tyrrelstown Luas route, including adequate reservations for three Luas stops within the core development areas, **ensuring that future development is designed in a manner that does not prejudice the delivery of a future Luas along the identified corridor."**

Amend Section 5.4 Proposed Public Transport – Bus on Page 28 as follows:

~~New B5 Spine Bus: This spine bus route will travel from the City Centre to Blanchardstown via Dunsink, offering local and wider connectivity.~~

Amend Section 5.4 Urban Layout to Accommodate Buses on Page 28 as follows:

Delete the following text:

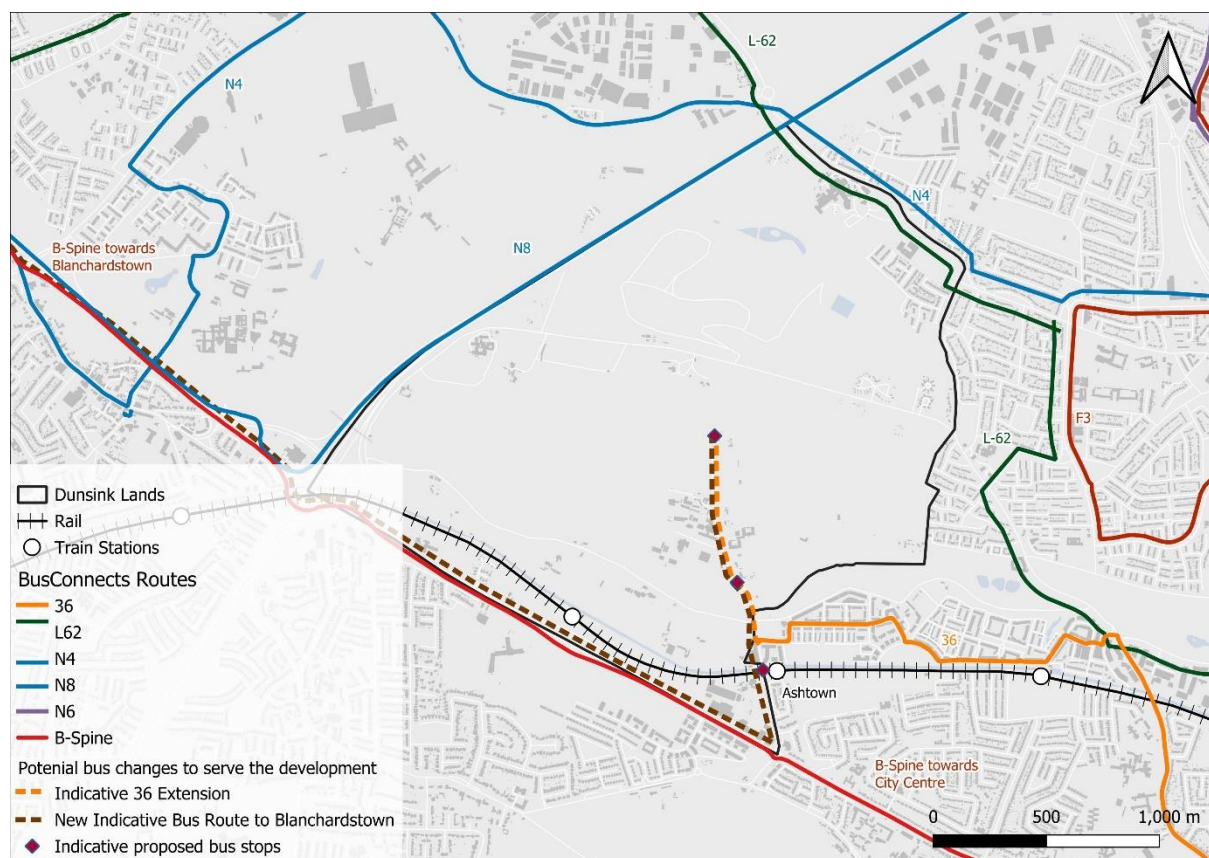
~~“Bus provision shall be agreed in consultation with the NTA”~~

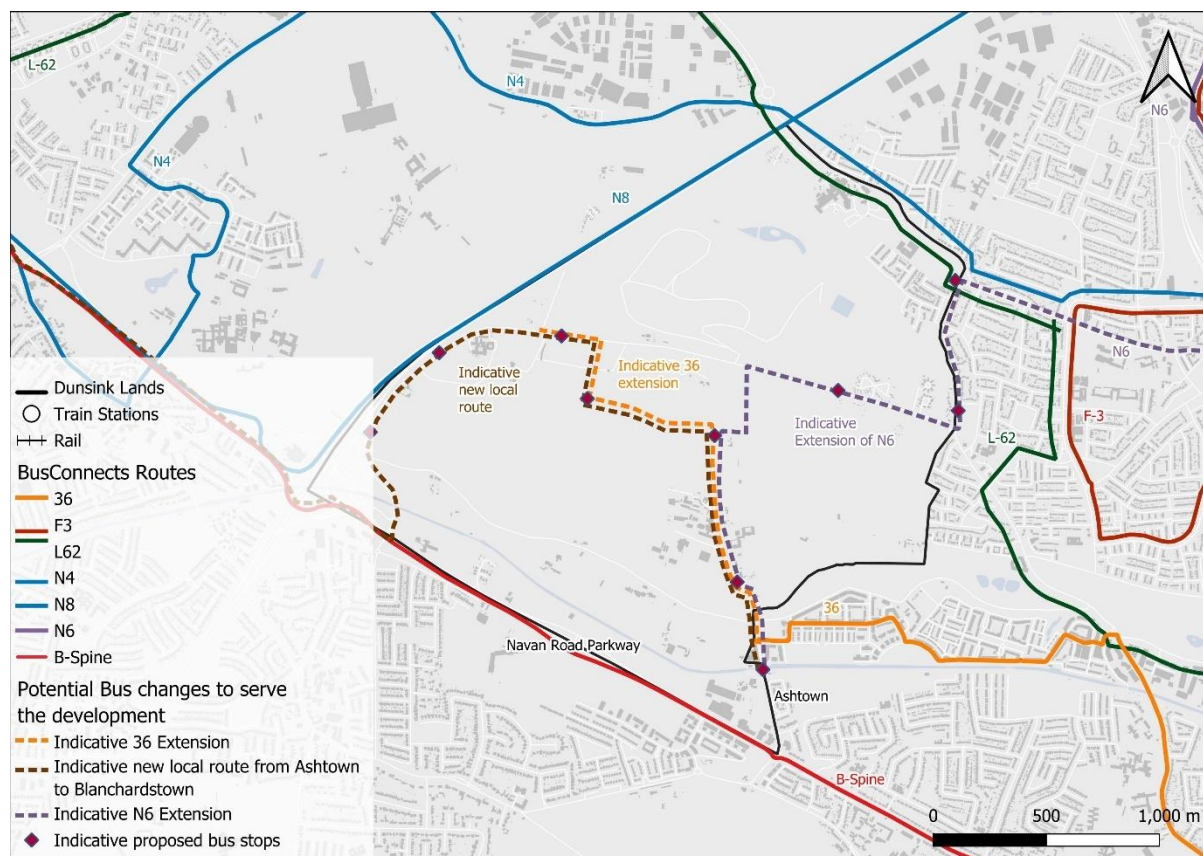
Include updated text as follows:

While provision has been made for bus routes within the urban area plan, these bus routes will be subject to more detailed planning and design work prior to implementation. This design work will be led by NTA in partnership with Fingal County Council.

Amend Figure 5.5 BusConnects Maps Phases 1, 2 / Full Build Out on Page 28 as follows:

Include indicative bus stop location maps and bus terminus infrastructure (including turning circles, laybys and driver welfare facilities as illustrated in the figures below and overleaf)





Amend Section 5.4 Proposed Public Transport – Bus on Page 29 as follows:

Insert additional objective after Objective CM07 and CM08 as follows:

Ensure that the street network, including junctions, will accommodate future movement by bus.

3. Thematic Issues Raised

The section of the report summarises other submissions on a thematic basis, as per Section 75(10)(b)(ii) of the Planning and Development Act 2024, as amended and provides the opinion and recommendations of the Chief Executive in respect of the matters raised. These are structured around the various chapters of the Draft Urban Area Plan followed by other specific issues.

Issues which relate to matters which are out of scope of the Draft Dunsink Urban Area Plan are addressed at the end of the section.

For each of the issues raised, the response of the Chief Executive is provided in addition to recommendations to amend the Draft Dunsink Urban Area Plan where appropriate.

3.1. Issues relating to Chapter 1 'Introduction and Background'

FIN-C973-10, FIN-C973-22, FIN-C973-27, FIN-C973-77, FIN-C973-89, FIN-C973-97, FIN-C973-100, FIN-C973-101, FIN-C973-105, FIN-C973-106, FIN-C973-129, FIN-C973-146, FIN-C973-149, FIN-C973-150, FIN-C973-152, FIN-C973-163, FIN-C973-178, FIN-C973-188, FIN-C973-203, FIN-C973-204, FIN-C973-205, FIN-C973-206, FIN-C973-208, FIN-C973-209, FIN-C973-210, FIN-C973-221, FIN-C973-226, FIN-C973-235, FIN-C973-237, FIN-C973-239, FIN-C973-240, FIN-C973-244, FIN-C973-247, FIN-C973-251, FIN-C973-278, FIN-C973-287, FIN-C973-291, FIN-C973-304, FIN-C973-317, FIN-C973-319, FIN-C973-342, FIN-C973-346, FIN-C973-352, FIN-C973-356, FIN-C973-362, FIN-C973-366, FIN-C973-404, FIN-C973-409, FIN-C973-463, FIN-C973-464, FIN-C973-492, FIN-C973-503, FIN-C973-504, FIN-C973-515, FIN-C973-543, FIN-C973-557, FIN-C973-564, FIN-C973-572, FIN-C973-580, FIN-C973-593, FIN-C973-610, FIN-C973-621, FIN-C973-624, FIN-C973-626, FIN-C973-644, FIN-C973-645, FIN-C973-658, FIN-C973-668, FIN-C973-695, FIN-C973-705, FIN-C973-708, FIN-C973-717, FIN-C973-755, FIN-C973-917, FIN-C973-924, FIN-C973-926, FIN-C973-932, FIN-C973-985, FIN-C973-1001, FIN-C973-1014, FIN-C973-1017, FIN-C973-1055, FIN-C973-1056, FIN-C973-1125, FIN-C973-1128, FIN-C973-1138, FIN-C973-1146, FIN-C973-1155, FIN-C973-1157, FIN-C973-1158.

Summary of Submissions

A number of submissions express the view that the level of public consultation undertaken was limited for a plan of such scale and together with the limited awareness of the plan, did not provide sufficient opportunities for meaningful public engagement with those affected by the plan.

A number of submissions expressed concern regarding the timing, location and accessibility of the public consultation. A number of submissions express concerns regarding the timing of the public consultation during the summer period when residents and stakeholders may be less able to engage with the process. The lack of dedicated public event for communities beyond the Fingal area was raised.

A number of submissions requested that a public information event should have been held in a convenient location close to communities directly impacted by the proposed Draft Plan. Difficulties accessing the printed documentation, including the reported cost of a hard copy, limited library availability of documents and the predominance of online material via the consultation portal were considered to disadvantage those without digital access and reduced the overall accessibility of the process. Comments were also made regarding the use of the specific online portal by Fingal County Council to receive submissions; stating that the system has no statutory footing and querying the implications of using the system on the lawfulness of the consultation process.

Submissions also emphasise the importance of undertaking inclusive and targeted consultation with specific resident and community groups including communities within Dublin City Council's jurisdiction, the Traveller community, local landowners, local horse and pony clubs and local sporting clubs, to ensure that the Draft Plan is informed by inclusive stakeholder participation.

A number of submissions recommended enhanced public consultation including extending the public consultation period, holding accessible information sessions with affected residents and communities including within the Dublin City Council administrative area. Other submission sought greater transparency regarding the engagement undertaken prior to the publication of the Draft Plan. Requests included publication of pre-draft engagement and notification of continued stages. One submission expresses concern that the application of GDPR provisions in practice, reduces the visibility of community led information and limits opportunities for public understanding and engagement. Overall submissions requested more open and inclusive public consultation given the significance of proposals for the plan area.

Chief Executive's Response

The Draft Dunsink Urban Area Plan was placed on public display in accordance with Section 75 of the Planning and Development Act 2024 as amended. Public consultation was undertaken in accordance with the statutory requirements of the Act including the prescribed consultation period and notification process. Notice of the proposed plan was published in a national newspaper and on the Council's website, as required. The prescribed bodies identified in legislation were also notified. Otherwise, there is no statutory requirement to notify individual landowners or other persons.

The Draft Plan was made available, free of charge for inspection, at designated public offices including Fingal County Council Offices and Fingal County Council Libraries. Copies of the Plan were also placed in Dublin City Council's Finglas Library and Finglas Area Office within Dublin City Council's administrative area. A co-ordinated programme of social media posts and digital communications further promoted the consultation, ensuring that information on the Draft Plan, the public display period and submission process was widely communicated and readily accessible.

During the statutory six-week public display period, members of the public and interested parties were invited to make submissions and observations for consideration by the Planning Authority, prior to the finalisation of the Plan.

It is noted that the digital planning portal is a mechanism for accessing and enabling a review of the plan documents and to allow submissions to be made. The system does not

restrict the length of submissions. The digital portal is one component of the overall active and inclusive public consultation process required under Section 75 of the Planning and Development Act 2024. It is also noted that submissions could be made in writing and by post to the Council in relation to the Draft Plan.

The Council is satisfied that the statutory requirements for public availability of the Draft Plan were met and that members of the public had reasonable opportunities to access the documentation and make submissions.

The Planning and Development Act 2024 as amended details how submissions must be made available. The submissions received by the Council were made available for viewing by the public in accordance with statutory requirements. In addition, it is noted that any personal data contained in the submissions must be handled in accordance with applicable data-protection GDPR requirements and the Council has no discretion in this regard.

Recognising the importance of meaningful stakeholder engagement, the Draft Dunsink Urban Area Plan process sought to engage proactively with a broad range of stakeholders and interested parties.

This included targeted consultation and engagement with the local Traveller families living in the area to provide an opportunity for members of the community to make their perspectives known during the plan process. This engagement sought to ensure their views were considered alongside those of other stakeholders in informing the Draft Plan process and as the area evolves.

It is also noted that the Council's Housing Section continues to proactively advance the established Traveller Accommodation Programme. The provision of Traveller-specific accommodation is advanced through a separate statutory process and will continue to be guided by relevant national and local policy objectives. The Council remains committed to supporting appropriate Traveller accommodation and fostering an inclusive and sustainable community within the future Dunsink City Quarter and recognising and respecting the area's unique social and cultural heritage.

Engagement also took place with the Elected Members and area TD's of Fingal County Council and Dublin City Council, recognising the strategic importance of the area and the need for co-ordinated planning across administrative boundaries.

A public information event was held in the Blanchardstown Library during the consultation period to provide members of the public with an opportunity to learn more

about the Draft Plan. The event facilitated open dialogue and provided an accessible forum for engagement with residents and interested parties. The public information evening was well attended by interested members of the local community and provided a valuable opportunity for parties to engage directly with the project team.

Overall, the preparation of the Draft Plan was characterised by a robust and inclusive engagement process. Through a combination of formal public consultation, targeted stakeholder engagement, briefings to Elected Members and TD's, adjoining Local Authority collaboration and a public information event, the Planning Authority sought to ensure that the Draft Plan is informed by a range of perspectives and views. In total, 1,163 submissions were received by the Planning Authority during the consultation process, illustrating the level of significant engagement by members of the public with the plan making process.

As required by legislation, the report of the Chief Executive will be distributed to the Elected Members of Fingal County Council for their consideration. The report will also be published online in accordance with the statutory requirements. There is no specific statutory requirement to notify other individual parties at this stage of the process.

Engagement is ongoing outside the statutory plan process between the operators of the local Horse and Pony Club and the relevant internal departments of Fingal County Council to identify a long-term and sustainable solution for continued operations. Fingal County Council will continue to work constructively with the operators and other relevant stakeholders to support the development of an appropriate long-term and sustainable solution that is consistent with the objectives of the Plan.

The Council continues to engage with Dublin City Council on an ongoing basis in relation to cross boundary plans, projects and initiatives. Ongoing collaboration between the two Local Authorities is important to ensure a co-ordinated approach to land-use, planning and infrastructure provision, transport, environmental protection and the delivery of strategic amenities and services across the administrative areas. This engagement will support the alignment of relevant policies and projects and help ensure that development in the plan area is appropriately integrated within adjoining areas.

Chief Executive's Recommendation

No change.

3.2. Issues relating to Chapter 2 'Policy Context'

FIN-C973-20, FIN-C973-503, FIN-C973-674, FIN-C973-678, FIN-C973-682.

Summary of Submissions

Some submissions note that the planned development within Dunsink will help meet national and regional housing targets and are supportive of the 15-minute concept based on the provision of infrastructure, services and amenities in tandem with development.

A number of submissions raise concerns regarding the extent to which the Draft Dunsink Urban Area Plan aligns with objectives of the National Planning Framework (NPF) and specifically, the priority hierarchy with specific reference to compact growth and the sequential approach, regeneration and brownfield development of the NPF and the Climate Action Plan 2025 where large-scale peripheral development risks an increase in embodied carbon, car dependency, transport emissions and presents challenges in the achievement of national climate change objectives and targets as well as the Regional Spatial and Economic Strategy (RSES) objectives in achieving resilient development, integration and infrastructure-led growth.

Chief Executive's Response

The preparation of the Draft Dunsink Urban Area Plan has been prepared in accordance with all relevant legislation, policies, guidelines and statutory requirements including the National Planning Framework First Revision April 2025 (NPF), the Climate Action Plan 2025, the Regional Spatial and Economic Strategy 2019-2031 (RSES) and other relevant policy documents. Chapter 2 Policy Context is not intended to constitute an exhaustive list of all relevant guidance and policy documents considered.

The Draft Dunsink Urban Area Plan seeks to promote compact and sustainable growth, integrate land use and transportation planning, support sustainable mobility, protect and enhance blue and green infrastructure and incorporates measures that strengthen climate resilience and facilitate adaptation to the impacts of climate change.

The NPF promotes compact growth as a core national planning objective through the regeneration and consolidation of existing urban areas to accommodate projected population growth. It targets at least 50% of all new homes within the existing built-up footprint of the five cities and their suburbs with a further focus on the sustainable development of appropriate strategic locations including greenfield locations that are capable of delivering significant housing supply, in a planned and co-ordinated manner and at locations that can be supported by existing and planned public transport investment and transit orientated development, that reduces dependence on private car travel.

The proposed development at Dunsink is consistent with this strategic approach. It represents the planned expansion of the Dublin Metropolitan Area, at a location identified through national and regional planning policy and incorporates phased delivery in tandem with strategic public transport, community infrastructure, employment opportunities and green infrastructure, thereby supporting the achievement of compact growth at scale through a framework for the co-ordinated and sustainable development of these strategic lands.

The Climate Action Plan seeks to reduce greenhouse gas emissions through integrated land use and transport planning, compact settlement patterns, sustainable public transport, walking and cycling infrastructure, strategic green infrastructure, nature-based solutions and climate adaptation measures. These objectives are reflected through the Draft Dunsink Urban Area Plan which provides for a transit-orientated pattern of development supported by strategic public transport, active travel networks, green and blue infrastructure, sustainable urban drainage systems and measures to enhance biodiversity and climate resilience. The Climate Action Plan does not preclude the development of strategically identified greenfield lands but rather requires that future growth is planned and delivered in a manner that minimises emissions and supports the transition to a low carbon and climate resilient society. In this regard, the proposed Draft Urban Area Plan is consistent with the objectives of the Climate Action Plan and national climate policy.

The RSES promotes the regeneration of brownfield lands as a key element of compact growth but equally acknowledges that strategically located greenfield lands are required to accommodate projected population growth supported by high-capacity public transport and essential enabling infrastructure.

The development of Dunsink as a strategic growth area is consistent with the Metropolitan Area Strategic Plan (MASP) contained within the RSES, which specifically recognises Dunsink as “a major greenfield landbank with long term potential to develop a new district centre” and further states that strategic public transport investment will “unlock long-term capacity including strategic landbanks such as Dunsink”.

The designation of Dunsink within the RSES reflects a strategic regional planning approach where the area is identified as capable of accommodating significant growth in an integrated and sustainable manner, essential to meeting the long-term housing and employment needs of the Dublin Metropolitan Area, supported by the timely delivery of public transport and other essential enabling infrastructure.

The Draft Dunsink Urban Area Plan gives effect to this regional strategy by providing for a plan led, compact, phased and infrastructure led pattern of development. The Draft Dunsink Urban Area Plan also gives effect to the RSES vision for resilient development by providing for an infrastructure-led, phased pattern of growth that integrates sustainable transport, strategic scale green infrastructure, biodiversity enhancement, sustainable urban drainage systems, flood risk management, urban greening and climate adaption objectives.

Accordingly, the Draft Dunsink Urban Area Plan is consistent with the NPF, the Climate Action Plan and RSES and represents an appropriate framework for the long-term, climate resilient development of this strategically identified and zoned landbank, balancing compact growth objectives with the delivery of a well-connected, low carbon and climate-resilient urban community.

Chief Executive's Recommendation

No change.

3.3. Issues relating to Chapter 3 'Vision and Strategic Objectives'

FIN-C973-94, FIN-C973-121, FIN-C973-148, FIN-C973-158, FIN-C973-166, FIN-C973-168, FIN-C973-242, FIN-C973-321, FIN-C973-350, FIN-C973-351, FIN-C973-356, FIN-C973-404, FIN-C973-454, FIN-C973-455, FIN-C973-478, FIN-C973-491, FIN-C973-496, FIN-C973-504, FIN-C973-512, FIN-C973-520, FIN-C973-535, FIN-C973-612, FIN-C973-659, FIN-C973-701.

Summary of Submissions

Overall, the submissions reflect a range of views with support for the vision and broader objectives and principles of the Draft Plan which provides an opportunity to support a compact, co-ordinated, sustainable and community and landscape led focused approach to address housing need in this underutilised area. A number of submissions are opposed to the overall principle of development and the impacts that the proposed development will bring to the area.

The submission from the Heritage Council as a Prescribed Body supports the Draft Plan's vision of creating a sustainable, connected urban community which respects its rich environment and heritage. The Heritage Council endorses the plan's vision which acknowledges the role of heritage in shaping place identity. The submission acknowledges that the natural and cultural heritage assets of Dunsink provide a unique basis for creating a sense of place. The submission also welcomes the prominence of heritage in the strategic objectives, particularly those relating to the protection and

enhancement of biodiversity and the protection and integration of built and natural heritage.

The submission from Dublin City Council as a Prescribed Body welcomes the publication of the Draft Dunsink Urban Area Plan and supports the vision and strategic objectives of the Plan for the co-ordinated delivery of housing and sustainable growth within the Dublin Metropolitan Area. The submission notes that the Draft Plan represents an important first step in the long-term development of these strategic lands, establishing an overarching framework, subject to further detailed design and technical studies at development management stage, to guide their future development. The submission highlights that the development of these strategic lands has the potential to make a significant contribution to meeting housing growth requirements and advancing National Planning Framework objectives for compact, transit-orientated development, having regard to the proximity of the lands to existing and planned strategic public transport infrastructure. Dublin City Council welcomes continued engagement with Fingal County Council and other relevant stakeholders as the Plan evolves and is implemented.

The submission from the Land Development Agency welcomes the Draft Dunsink Urban Plan which facilitates the development of this strategic landbank which is capable of delivering new homes at scale, based on a transit-orientated, infrastructure-led and phased development approach, to address future housing growth in the Dublin Metropolitan Area. The submission also highlights the Land Development Agency's role as a housing provider in utilising and optimising relevant public lands including lands in the plan area and welcomes engagement with Fingal County Council in this regard.

Chief Executive's Response

The supportive submissions from the Heritage Council, Dublin City Council and the Land Development Agency and the commitment for continued engagement with Fingal County Council in the context of advancing the Draft Dunsink Urban Area Plan are acknowledged and welcomed.

As set out in Section 3.2 of this report, the proposed development of this zoned strategic landbank is aligned with the settlement, growth, housing and sustainable development objectives of the applicable national, regional and local policy framework. Development of this landbank will support the planned consolidation and sustainable expansion of the wider Dublin Metropolitan area, make efficient use of zoned lands and contribute to the delivery of development in accordance with the established spatial strategy.

Accordingly, the Draft Plan represents policy led development of strategically identified lands. The vision and strategic objectives of the Draft Plan seek to promote compact,

sustainable and phased growth in tandem with the co-ordinated delivery of infrastructure alongside new development.

Chief Executive's Recommendation

No change.

3.4. Issues relating to Chapter 4 'Spatial Strategy'

FIN-C973-319, FIN-C973-357, FIN-C973-591.

Primary Land Uses

Summary of Submissions

Some submissions are supportive of the proposed spatial strategy for the plan area.

One submission requests that Figure 4.2 Spatial Framework be corrected to show the Dublin Grass Machinery lands as existing built environment in line with the approach taken for other lands in commercial and employment uses within the plan area. The submission contends that the mapping appears to assume the future removal of the business without justification.

Concerns were also raised that development identified in the spatial framework overlaps with existing properties and homes and notes that existing properties cannot be simply displaced to facilitate future development.

Chief Executive's Response

The support for the proposed spatial strategy is welcomed.

The concerns regarding the spatial framework are noted. In the interests of clarity, the spatial framework as shown in Figure 4.2 is intended to provide a high-level, indicative spatial framework for the plan area and does not represent a detailed land-use map and is not intended to preclude or unnecessarily restrict existing properties, businesses or operations. It is intended to illustrate potential development opportunities and the broad spatial arrangement of future growth. Any future development would be subject to detailed assessment, design, planning processes and consideration of existing land uses and property interests, through the development management process, which includes statutory public consultation stages to address issues of concern.

Chief Executive's Recommendation

No change.

3.5. Issues relating to Chapter 5 'Connectivity and Movement'

FIN-C973-1, FIN-C973-3, FIN-C973-4, FIN-C973-5, FIN-C973-7, FIN-C973-11, FIN-C973-14, FIN-C973-16, FIN-C973-17, FIN-C973-19, FIN-C973-21, FIN-C973-23, FIN-C973-24, FIN-C973-25, FIN-C973-26, FIN-C973-27, FIN-C973-28, FIN-C973-29, FIN-C973-31, FIN-C973-33, FIN-C973-34, FIN-C973-35, FIN-C973-38, FIN-C973-39, FIN-C973-40, FIN-C973-41, FIN-C973-42, FIN-C973-43, FIN-C973-51, FIN-C973-52, FIN-C973-55, FIN-C973-58, FIN-C973-60, FIN-C973-61, FIN-C973-69, FIN-C973-77, FIN-C973-78, FIN-C973-79, FIN-C973-80, FIN-C973-81, FIN-C973-85, FIN-C973-87, FIN-C973-89, FIN-C973-90, FIN-C973-91, FIN-C973-92, FIN-C973-93, FIN-C973-96, FIN-C973-97, FIN-C973-99, FIN-C973-100, FIN-C973-101, FIN-C973-102, FIN-C973-103, FIN-C973-104, FIN-C973-105, FIN-C973-107, FIN-C973-109, FIN-C973-110, FIN-C973-112, FIN-C973-113, FIN-C973-114, FIN-C973-115, FIN-C973-116, FIN-C973-117, FIN-C973-118, FIN-C973-119, FIN-C973-121, FIN-C973-122, FIN-C973-123, FIN-C973-124, FIN-C973-125, FIN-C973-126, FIN-C973-128, FIN-C973-129, FIN-C973-130, FIN-C973-134, FIN-C973-135, FIN-C973-136, FIN-C973-137, FIN-C973-138, FIN-C973-139, FIN-C973-140, FIN-C973-142, FIN-C973-143, FIN-C973-144, FIN-C973-145, FIN-C973-146, FIN-C973-147, FIN-C973-148, FIN-C973-149, FIN-C973-150, FIN-C973-151, FIN-C973-153, FIN-C973-154, FIN-C973-155, FIN-C973-156, FIN-C973-157, FIN-C973-159, FIN-C973-160, FIN-C973-161, FIN-C973-162, FIN-C973-163, FIN-C973-164, FIN-C973-165, FIN-C973-166, FIN-C973-167, FIN-C973-168, FIN-C973-169, FIN-C973-174, FIN-C973-175, FIN-C973-176, FIN-C973-177, FIN-C973-178, FIN-C973-179, FIN-C973-180, FIN-C973-182, FIN-C973-183, FIN-C973-187, FIN-C973-188, FIN-C973-189, FIN-C973-190, FIN-C973-191, FIN-C973-192, FIN-C973-193, FIN-C973-194, FIN-C973-195, FIN-C973-196, FIN-C973-197, FIN-C973-198, FIN-C973-199, FIN-C973-200, FIN-C973-201, FIN-C973-202, FIN-C973-207, FIN-C973-208, FIN-C973-209, FIN-C973-210, FIN-C973-213, FIN-C973-214, FIN-C973-215, FIN-C973-216, FIN-C973-217, FIN-C973-218, FIN-C973-219, FIN-C973-220, FIN-C973-221, FIN-C973-222, FIN-C973-223, FIN-C973-224, FIN-C973-226, FIN-C973-228, FIN-C973-229, FIN-C973-233, FIN-C973-237, FIN-C973-238, FIN-C973-239, FIN-C973-241, FIN-C973-242, FIN-C973-243, FIN-C973-244, FIN-C973-247, FIN-C973-248, FIN-C973-249, FIN-C973-251, FIN-C973-272, FIN-C973-274, FIN-C973-278, FIN-C973-279, FIN-C973-280, FIN-C973-281, FIN-C973-287, FIN-C973-291, FIN-C973-293, FIN-C973-295, FIN-C973-298, FIN-C973-302, FIN-C973-304, FIN-C973-316, FIN-C973-317, FIN-C973-319, FIN-C973-321, FIN-C973-323, FIN-C973-324, FIN-C973-325, FIN-C973-328, FIN-C973-331, FIN-C973-334, FIN-C973-335, FIN-C973-337, FIN-C973-338, FIN-C973-341, FIN-C973-342, FIN-C973-344, FIN-C973-345, FIN-C973-346, FIN-C973-348, FIN-C973-350, FIN-C973-352, FIN-C973-355, FIN-C973-357, FIN-C973-362, FIN-C973-364, FIN-C973-366, FIN-C973-367, FIN-C973-372, FIN-C973-373, FIN-C973-374, FIN-C973-375, FIN-C973-377, FIN-C973-379, FIN-C973-380, FIN-C973-382, FIN-C973-383, FIN-C973-385, FIN-C973-386, FIN-C973-388, FIN-C973-389, FIN-C973-390, FIN-C973-391, FIN-C973-392, FIN-C973-393, FIN-C973-394, FIN-C973-395, FIN-C973-396, FIN-C973-397, FIN-C973-398, FIN-C973-399, FIN-C973-400, FIN-C973-402, FIN-C973-403, FIN-C973-404, FIN-C973-405, FIN-C973-407, FIN-C973-408, FIN-C973-409, FIN-C973-410, FIN-C973-411, FIN-C973-412, FIN-C973-414, FIN-C973-415, FIN-C973-416, FIN-C973-417, FIN-C973-418, FIN-C973-419, FIN-C973-420, FIN-C973-421, FIN-C973-423, FIN-C973-424, FIN-C973-425, FIN-

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C973-772, FIN-C973-773, FIN-C973-774, FIN-C973-775, FIN-C973-776, FIN-C973-777, FIN-C973-778, FIN-C973-779, FIN-C973-780, FIN-C973-781, FIN-C973-782, FIN-C973-783, FIN-C973-784, FIN-C973-785, FIN-C973-786, FIN-C973-787, FIN-C973-788, FIN-C973-789, FIN-C973-790, FIN-C973-792, FIN-C973-793, FIN-C973-794, FIN-C973-795, FIN-C973-796, FIN-C973-797, FIN-C973-798, FIN-C973-799, FIN-C973-800, FIN-C973-801, FIN-C973-802, FIN-C973-803, FIN-C973-804, FIN-C973-806, FIN-C973-807, FIN-C973-808, FIN-C973-809, FIN-C973-810, FIN-C973-811, FIN-C973-812, FIN-C973-813, FIN-C973-814, FIN-C973-815, FIN-C973-816, FIN-C973-817, FIN-C973-818, FIN-C973-819, FIN-C973-820, FIN-C973-821, FIN-C973-822, FIN-C973-823, FIN-C973-824, FIN-C973-825, FIN-C973-826, FIN-C973-827, FIN-C973-828, FIN-C973-829, FIN-C973-830, FIN-C973-831, FIN-C973-832, FIN-C973-833, FIN-C973-834, FIN-C973-835, FIN-C973-836, FIN-C973-837, FIN-C973-838, FIN-C973-839, FIN-C973-840, FIN-C973-841, FIN-C973-842, FIN-C973-843, FIN-C973-844, FIN-C973-845, FIN-C973-846, FIN-C973-847, FIN-C973-848, FIN-C973-849, FIN-C973-850, FIN-C973-851, FIN-C973-852, FIN-C973-853, FIN-C973-854, FIN-C973-855, FIN-C973-856, FIN-C973-857, FIN-C973-858, FIN-C973-859, FIN-C973-860, FIN-C973-861, FIN-C973-862, FIN-C973-863, FIN-C973-864, FIN-C973-865, FIN-C973-866, FIN-C973-867, FIN-C973-868, FIN-C973-869, FIN-C973-870, FIN-C973-871, FIN-C973-872, FIN-C973-873, FIN-C973-874, FIN-C973-875, FIN-C973-876, FIN-C973-877, FIN-C973-878, FIN-C973-879, FIN-C973-880, FIN-C973-881, FIN-C973-882, FIN-C973-883, FIN-C973-884, FIN-C973-885, FIN-C973-886, FIN-C973-887, FIN-C973-888, FIN-C973-889, FIN-C973-890, FIN-C973-891, FIN-C973-892, FIN-C973-893, FIN-C973-894, FIN-C973-895, FIN-C973-896, FIN-C973-897, FIN-C973-898, FIN-C973-899, FIN-C973-900, FIN-C973-901, FIN-C973-902, FIN-C973-903, FIN-C973-904, FIN-C973-905, FIN-C973-906, FIN-C973-907, FIN-C973-908, FIN-C973-909, FIN-C973-910, FIN-C973-911, FIN-C973-912, FIN-C973-913, FIN-C973-914, FIN-C973-915, FIN-C973-916, FIN-C973-917, FIN-C973-918, FIN-C973-919, FIN-C973-920, FIN-C973-921, FIN-C973-922, FIN-C973-923, FIN-C973-924, FIN-C973-925, FIN-C973-926, FIN-C973-927, FIN-C973-928, FIN-C973-929, FIN-C973-930, FIN-C973-931, FIN-C973-932, FIN-C973-933, FIN-C973-934, FIN-C973-935, FIN-C973-936, FIN-C973-937, FIN-C973-938, FIN-C973-939, FIN-C973-940, FIN-C973-941, FIN-C973-942, FIN-C973-943, FIN-C973-944, FIN-C973-945, FIN-C973-946, FIN-C973-947, FIN-C973-948, FIN-C973-949, FIN-C973-950, FIN-C973-951, FIN-C973-952, FIN-C973-953, FIN-C973-954, FIN-C973-955, FIN-C973-956, FIN-C973-957, FIN-C973-958, FIN-C973-959, FIN-C973-960, FIN-C973-961, FIN-C973-962, FIN-C973-963, FIN-C973-964, FIN-C973-965, FIN-C973-966, FIN-C973-967, FIN-C973-968, FIN-C973-969, FIN-C973-970, FIN-C973-971, FIN-C973-972, FIN-C973-973, FIN-C973-974, FIN-C973-975, FIN-C973-976, FIN-C973-977, FIN-C973-978, FIN-C973-979, FIN-C973-980, FIN-C973-981, FIN-C973-982, FIN-C973-983, FIN-C973-985, FIN-C973-987, FIN-C973-988, FIN-C973-989, FIN-C973-990, FIN-C973-991, FIN-C973-992, FIN-C973-993, FIN-C973-994, FIN-C973-995, FIN-C973-997, FIN-C973-998, FIN-C973-999, FIN-C973-1000, FIN-C973-1001, FIN-C973-1002, FIN-C973-1004, FIN-C973-1005, FIN-C973-1006, FIN-C973-1007, FIN-C973-1008, FIN-C973-1009, FIN-C973-1010, FIN-C973-1011, FIN-C973-1012, FIN-C973-1013, FIN-C973-1014, FIN-C973-1015, FIN-C973-1016, FIN-C973-1018, FIN-C973-1019, FIN-C973-1020, FIN-C973-1021, FIN-C973-1022, FIN-C973-1023, FIN-C973-1024, FIN-C973-1025, FIN-C973-1026, FIN-C973-1027, FIN-C973-1028, FIN-C973-1029, FIN-C973-1032, FIN-C973-1033, FIN-C973-1034, FIN-C973-1035, FIN-C973-

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Proposed Public Transport

Summary of Submissions

Submissions raise a range of issues regarding the provision, capacity and timing of public transport infrastructure required to support the scale of development proposed within Dunsink. While there is broad support for the Draft Plan's transit-oriented development approach, many submissions emphasise that the success of this strategy is dependent on the timely delivery of high-capacity public transport and associated active travel infrastructure.

A recurring concern is that existing public transport services are already operating under significant pressure. Submissions note that rail services serving Ashtown and Navan Road Parkway stations, as well as existing bus services, experience capacity constraints and overcrowding at peak periods. It is argued that substantial additional population growth should not proceed in advance of the public transport capacity necessary to support it.

Several submissions seek stronger commitments regarding the delivery of major public transport projects, including DART+ West, Luas Finglas and the proposed Luas extension to Tyrrelstown. Concerns are raised regarding the funding, approval status, delivery timelines and governance arrangements associated with these projects. A number of

submissions request that DART+ West be fully operational before substantial residential occupation occurs within Dunsink and that future development phases be linked to the delivery of key public transport infrastructure.

Some submissions state that extensive residential development in advance of the delivery of high-capacity public transport, particularly the proposed Luas extension, would be inconsistent with national, regional and local planning policy. Reference is made to the EMRA Regional Spatial and Economic Strategy, which identifies Dunsink as a strategic growth area on the basis of high-capacity public transport provision.

Many submissions support the acceleration of DART+ West and seek its prioritisation through the National Development Plan and associated investment programmes. Some submissions contend that the enhanced capacity provided by DART+ West could accommodate a greater proportion of future growth and reduce reliance on the proposed Luas extension to Tyrrelstown.

A number of submissions support the principle of Transit-Oriented Development (TOD) but argue that the Draft Plan does not fully align with TOD principles due to uncertainty surrounding the timing and delivery of key transport infrastructure. It is argued that the Plan's low-car development model, high residential densities and modal-share assumptions are heavily dependent on public transport projects that are not yet approved, funded or sufficiently advanced in the planning process.

Particular concerns are raised regarding the reliance placed on the proposed Luas extension to Tyrrelstown. Submissions state that the project is not currently committed for delivery within the Greater Dublin Area Transport Strategy period and argue that uncertainty regarding its delivery undermines assumptions underpinning the transport strategy. Several submissions also note that the Transport Assessment identifies the Luas as a critical element in maintaining future network performance and request that accelerated housing delivery be matched by accelerated delivery of the Luas project. Some submissions recommend that the forthcoming review of the Greater Dublin Area Transport Strategy prioritise the Luas Tyrrelstown extension.

Several submissions highlight that the Luas extension is only required to be under construction or operational by Phase 3, while other public transport interventions, such as the N6 bus extension are identified for later phases of development. Concerns are raised that early phases could therefore proceed with limited public transport provision, resulting in increased pressure on the existing road network.

Some submissions object to the proposed Luas alignment and request the Council publish an options assessment appraising alignments.

A number of submissions request that development and occupancy thresholds be linked to the delivery of public transport infrastructure, with future phases of residential development contingent on specified transport improvements being operational. Submissions also seek ongoing monitoring of passenger demand, service performance and network capacity throughout the development of the area, together with defined intervention and mitigation measures where required.

Some submissions highlight that while Dunsink is located relatively close to Ashtown and Navan Road Parkway stations, actual walking and cycling routes are indirect and less convenient than straight-line distances suggest. These submissions support measures to improve accessibility to both stations, including enhanced pedestrian and cycle links, improved public realm and better integration with the wider active travel network.

A number of submissions identify Navan Road Parkway Station as having greater long-term potential to function as a strategic transport hub due to perceived constraints at Ashtown Station. These submissions support enhanced connections to Navan Road Parkway, including a new bridge crossing, access to the Royal Canal Greenway, improved interchange facilities and enhanced bus connectivity to surrounding employment and residential areas.

Several submissions seek clarification regarding proposed bus network changes, including extensions to existing routes, the operation of the proposed bus gate on Dunsinea Lane and the timing of orbital bus services. Concerns are raised regarding the certainty of these interventions and their potential impacts on existing communities.

Several submissions seek clarification regarding proposed amendments to existing bus services, including the 40E route, and their potential impact on adjoining residential amenity and surrounding communities.

A submission from Sport Ireland notes that the Luas alignment shown on the Draft Plan, could have a significant impact on the campus. While Sport Ireland supports the extension of the Luas to serve the campus, it requests that the final alignment fully take account of the campus and its Government-supported masterplan. Sport Ireland also highlights that the early delivery of the Luas bridge could provide an opportunity to accommodate bus services and active travel infrastructure, creating direct connections between Dunsink to Sport Ireland, TUD and Connolly Hospital.

Some submissions request that the Luas alignment be confirmed before the plan is adopted and request confirmation of any part of Scribblestown Park and other areas which would be taken for the proposed Luas alignment.

Iarnród Éireann is broadly supportive of the Draft Plan and its transport strategy. The submission supports higher-density development in proximity to Ashtown and Navan Road Parkway stations and welcomes proposals for improved walking and cycling links, mobility hubs and enhanced access to the rail network. Iarnród Éireann has indicated its willingness to work with Fingal County Council and other stakeholders in advancing these proposals.

Submissions support the principle of transit-oriented development within Dunsink but seek greater certainty regarding the timing, funding and delivery of public transport infrastructure. A recurring theme is that development should be closely aligned with the provision of sufficient rail, Luas, bus and interchange capacity to ensure that sustainable transport objectives can be achieved and that additional pressure is not placed on the existing transport network.

Chief Executive's Response

The Draft Dunsink Urban Area Plan is based on the principles of Transit-Oriented Development (TOD), with the scale and phasing of development aligned to the delivery of public transport, active travel and supporting transport infrastructure. The objective of the Draft Plan is to create a highly accessible and sustainable urban community where a significant proportion of trips can be undertaken by public transport, walking and cycling, reducing reliance on private car travel.

The concerns raised regarding the capacity of existing public transport services are acknowledged. Fingal County Council recognises the importance of ensuring that sufficient transport capacity is available to accommodate future population growth. In this regard, the Transport Assessment has been informed by the National Transport Authority's Regional Modelling System and assesses the capacity of future transport infrastructure, including DART+ West, enhanced bus services and the future Luas corridor, to accommodate projected travel demand arising from the development of Dunsink.

The Draft Plan strongly supports the delivery of DART+ West and recognises it as a critical component of the area's future transport network. The project has received Railway Order approval and is progressing through the delivery process. The substantial increase in rail capacity associated with DART+ West will significantly enhance the accessibility of Dunsink and support future development within the area.

Fingal County Council also acknowledges submissions seeking greater certainty regarding the delivery of the proposed Luas extension to Tyrrelstown. While the timing of this project is subject to the National Transport Authority's investment and delivery programmes, the Draft Plan safeguards and protects a strategic public transport corridor to facilitate its future delivery. It is anticipated that the review of the National Transport Authority's 'Transport Strategy for the Greater Dublin Area 2022-2042' will commence next year and will provide an opportunity to revisit the timescale for delivery of this project. The Draft Plan identifies the Luas as a key long-term component of the public transport network and supports its advancement through ongoing engagement with the National Transport Authority, Transport Infrastructure Ireland and other relevant stakeholders.

The phased transport strategy set out in the Draft Plan is intended to ensure that public transport provision evolves alongside development. This includes enhanced local and orbital bus services, improved connections to Ashtown and Navan Road Parkway Stations, new active travel infrastructure, and the protection of future public transport corridors. The Draft Plan also supports improvements to public transport interchange facilities, walking and cycling access to rail stations and stronger connections to the wider public transport network.

The submissions supporting enhanced connectivity to Navan Road Parkway Station are noted. The Draft Plan includes provision for a new active travel bridge, which may also facilitate public transport, connecting Dunsink to Navan Road Parkway Station, the Royal Canal Greenway and the surrounding area. This strategic link will significantly improve accessibility to the rail network and strengthen integration between Dunsink and adjoining communities.

The concerns raised regarding indirect walking and cycling routes to existing rail stations are acknowledged. The Draft Plan includes a comprehensive network of active travel connections designed to improve access to both Ashtown and Navan Road Parkway Stations and encourage greater use of sustainable travel modes.

Fingal County Council notes the requests for development thresholds linked to transport delivery. The Draft Plan already incorporates a phased infrastructure-led approach whereby key transport infrastructure is delivered in parallel with development. This is detailed in Chapter 13 of the Plan.

In relation to bus services, the public transport proposals contained within the Draft Plan have been developed in consultation with the National Transport Authority and are intended to improve accessibility both within Dunsink and to surrounding communities.

The detailed design and operation of future bus routes, including the proposed bus gate on Dunsinea Lane, route extensions and service frequencies, will be determined by the relevant transport agencies as projects progress.

Fingal County Council welcomes the support expressed by Iarnród Éireann for the overall transport strategy, including higher-density development in proximity to rail stations, enhanced active travel links, mobility hubs and improved access to the rail network. The support from Sport Ireland for improved public transport and active travel connections is also welcomed. The Council acknowledges Sport Ireland's request that any future Luas alignment should be developed having regard to the operation and future development of the Sport Ireland Campus. As set out previously in Section 2.4, the alignment through the western end of the Plan lands is recommended to be amended which would affect the alignment into the Sport Ireland Campus. It is recognised that the routing and alignment of the Luas shown in the Draft Plan is indicative and will be refined by the National Transport Authority and other relevant agencies as part of the future project development process. Therefore, an indicative alignment outside of the Plan lands will not be shown.

The concerns raised regarding land requirements, route alignments and impacts on existing properties are also acknowledged. Any future transport infrastructure projects will be subject to detailed design, environmental assessment, statutory consent processes and consultation with affected landowners. Fingal County Council will continue to work with landowners and stakeholders to minimise impacts on residential amenity, property access and landholdings wherever possible.

Overall, it is considered that the Draft Plan provides a robust and integrated public transport strategy which supports the delivery of a sustainable, transit-oriented community. The Plan aligns with national, regional and local transport policy objectives and provides an appropriate framework for the phased delivery of public transport infrastructure required to support the long-term development of Dunsink.

Chief Executive's Recommendation

No change.

Proposed Active Travel Provision

Summary of Submissions

Submissions generally support the Draft Plan's objective of prioritising walking, cycling and public transport and welcome the proposed network of greenways, active travel routes and connections to surrounding communities. There is strong support for the creation of a safe, connected and attractive active travel network that links new

development areas with public transport services, schools, employment centres, community facilities and recreational destinations.

Several submissions seek the early delivery of key active travel infrastructure, including connections to the Royal Canal Greenway, enhanced pedestrian and cycle routes and new footpaths and cycleways linking Dunsink with surrounding communities. The Department of Transport also welcomes the strong emphasis placed on active travel and sustainable transport within the Draft Plan.

A number of submissions support the provision of a new pedestrian and cycle bridge linking Dunsink with Navan Road Parkway Station, River Road and Coolmine Rugby Club, citing benefits including improved accessibility, enhanced connectivity to public transport, reduced car dependency and wider community benefits. Some submissions also note that the bridge would improve access to businesses operating within the grounds of Coolmine Rugby Club by facilitating customer access on foot and by bicycle from nearby rail stations. Support is also expressed for improved connections between Dunsink and Tolka Valley, including the provision of a pedestrian and cycle link from River Road to Tolka Valley Park.

Strong support is also expressed for the proposed light rail and active travel bridge crossing the M50, with submissions noting that the proposal is consistent with the objectives of the Fingal Development Plan and would provide an important strategic connection between Dunsink, the Sport Ireland Campus, Connolly Hospital and the wider Dublin Enterprise Zone. Sport Ireland, in particular, strongly supports the proposed active travel connections and bridge link to the Sport Ireland Campus lands

A number of submissions request additional active travel connections, including links to adjoining residential areas and other key destinations. Submissions also seek engagement with affected landowners, community groups and sporting organisations during the detailed design stage, together with clear wayfinding and signage measures. Some submissions question the how active travel routes will interact with the operation and function of existing businesses, community and health services.

Submissions raise concerns regarding existing road safety issues in the area, including congestion, inadequate cycling facilities, poor-quality footpaths and limited crossing opportunities on routes such as the Ratoath Road. Measures requested include road safety assessments, traffic calming, improved crossings and footpaths, and the delivery of active travel infrastructure in advance of, or alongside, residential development. Some submissions also suggest that Scribblestown Lane should function as an active travel corridor rather than a principal vehicular access route.

A number of submissions support the proposed conversion of River Road into a quietway through the introduction of filtered permeability measures. These submissions advocate for implementation during Phase 1, or earlier, noting that the existing road environment is unsuitable for pedestrians and cyclists and that alternative routes are available for through traffic. One submission also refers to previous proposals to upgrade River Road and recommends that such improvements be delivered in tandem with the development of Dunsink.

Conversely, a number of submissions object to the proposed filtered permeability measures on River Road, expressing concerns regarding their potential impact on existing businesses, residential access arrangements and future servicing requirements. These submissions seek assurances that access for residents, businesses, deliveries and emergency services will be maintained throughout the lifetime of the Plan. Some submissions also question the justification for the proposal, noting that alternative strategic cycling routes are identified within the Greater Dublin Area Cycle Network Plan.

Some submissions further emphasise that walking and cycling infrastructure should be protected from the impacts of increased traffic associated with future development. A number of submissions also request that future school developments be accompanied by evidence-based travel assessments, road safety audits, traffic sensitivity testing, school street assessments and appropriate monitoring and mitigation measures where required.

Chief Executive's Response

The Draft Dunsink Urban Area Plan is founded on the principle of sustainable mobility and promotes a modal shift towards walking, cycling and public transport. The Plan includes a comprehensive active travel network designed to connect existing and future communities with public transport services, schools, employment areas, community facilities, open spaces and recreational destinations.

The strong support expressed for the Plan's active travel strategy, including the proposed greenway network, active travel routes and connections to surrounding communities, is welcomed. The Plan provides for the phased delivery of active travel infrastructure, including the Active Travel Loop, greenway connections, strategic walking and cycling routes, and improved links to existing and proposed public transport infrastructure.

In response to submissions seeking enhanced connectivity to the Royal Canal Greenway and neighbouring communities, the Draft Plan includes a number of strategic connections linking Dunsink to Navan Road Parkway Station, the Royal Canal Greenway, Ashtown, the Tolka Valley and adjoining residential areas. These connections will improve

accessibility, support sustainable travel patterns and strengthen integration with the wider movement network.

The support received for the proposed active travel and public transport bridge connecting Dunsink to Navan Road Parkway Station is noted. Objective CM11 and Objective UDF47 provide for the delivery of this strategic connection, which will significantly improve access to rail services, the Royal Canal Greenway and the wider active travel network. Subject to feasibility, the bridge could also provide improved connectivity to Coolmine Rugby Club and associated businesses, supporting local accessibility and reducing reliance on private car travel.

Similarly, support for the proposed active travel and public transport bridge across the M50 is noted. This infrastructure forms an important component of the movement strategy for Dunsink and will provide strategic connections to the Sport Ireland Campus, Connolly Hospital, the Dublin Enterprise Zone and surrounding employment destinations. The support expressed by Sport Ireland for the proposed active travel connections and bridge link is welcomed.

The requests for additional active travel connections, enhanced wayfinding and continued engagement with local communities, sporting organisations and landowners are acknowledged. The detailed design and implementation of active travel infrastructure will be progressed through subsequent planning and design stages, where stakeholder engagement and accessibility considerations will form part of the process.

Concerns relating to road safety, congestion, pedestrian and cycling facilities, crossing points and footpath quality are also noted. The proposed active travel network, together with future development proposals, will be subject to detailed transport assessments, road safety considerations and infrastructure design requirements to ensure safe and attractive environments for walking and cycling. The Draft Plan supports the delivery of active travel infrastructure in tandem with the development of the area and seeks to create a network of safe, accessible and connected routes throughout Dunsink

With regard to River Road, the Draft Plan proposes the introduction of filtered permeability measures to facilitate its transformation into a quieter and safer environment for walking and cycling while maintaining local vehicular access. The objective of this approach is to reduce through-traffic and rat-running, improve safety and support the delivery of the Active Travel Loop and connections to Navan Road Parkway Station, Coolmine Rugby Club, the Royal Canal Greenway and the wider active travel network. The concerns raised regarding the potential impact of filtered permeability measures on residents, businesses and servicing requirements are

acknowledged. It is not intended to restrict local access to properties or businesses on River Road. Access for residents, businesses, deliveries, servicing and emergency vehicles will be maintained, with the specific design and operation of any filtered permeability measures to be determined through detailed design and assessment. This issue can be clarified in the text of the Plan.

Overall, the Draft Plan provides a robust framework for the delivery of a comprehensive active travel network while balancing the need for connectivity, accessibility, road safety and the operational requirements of existing communities and businesses.

Chief Executive's Recommendation

Amend Section 5.5 Proposed Active Travel Provision on Page 31 under Segregated Cycleways:

Insert the following text:

Two connections will link directly to Navan Road Parkway and Ashtown Rail Stations, enabling seamless access to the future DART+ West and the Royal Canal Greenway. The link to Navan Road Parkway station will also allow links with the Royal Canal Greenway **and if feasible, should also provide a link to Coolmine Rugby Club.**

Amend Section 5.5 Proposed Active Travel Provision, Page 31, under Quietway on River Road:

Insert the following text:

River Road is proposed to become a designated quietway. Quietways are cycling and walking routes designed to provide a safer, calmer alternative to busy main roads. Through traffic will be removed by installing a filtered permeability solution. **Local access to residents and businesses situated along River Road will be maintained from the M50 and Ashtown Road/Dunsinea Lane.**

Proposed Road Improvements and Vehicular Movement

Summary of Submissions

A number of submissions raise concerns regarding the capacity of the existing road network to accommodate the scale of development proposed within Dunsink. Particular concerns relate to existing congestion on the Navan Road, Ratoath Road, Scribblestown Lane, Dunsink Lane, Dunsinea Lane, Tolka Valley Road and River Road corridors, with submissions arguing that the proposed development could place additional pressure on an already constrained network.

Several submissions highlight existing congestion on the N3 and M50 corridors, particularly at the M50/N3 Interchange (Junction 6), and question whether the road

network has sufficient capacity to accommodate the projected increase in population and travel demand. Some submissions contend that the Draft Plan does not provide for significant new strategic road infrastructure or enhanced access to the M50, despite the scale of development proposed.

A number of submissions request the delivery of road upgrades, junction improvements, new road connections and additional access points either in advance of, or alongside, development. In particular, submissions seek improved vehicular connections from the Castleknock, N3 and M50 side of the Plan area, rather than relying primarily on access through Finglas and the eastern side of Dunsink.

Concerns are also raised regarding the cumulative impact of planned and permitted developments in the wider area, including the potential for increased congestion at key junctions and along surrounding routes. Several submissions question whether the transport modelling adequately captures these cumulative impacts and request ongoing monitoring and the timely implementation of mitigation measures as development progresses.

The role of Scribblestown Lane as a principal access route to the new urban area is a recurring issue. A number of submissions question the suitability of the lane for this function, citing its rural character, proximity to existing residential properties, perceived capacity constraints and potential road safety impacts. Some submissions contend that the proposed role of Scribblestown Lane is inconsistent with the principles in the 'Design Manual for Urban Roads and Streets' (2013) (DMURS) and suggest that it should instead function primarily as a quietway or active travel corridor.

A number of submissions also raise similar concerns about Dunsinea Lane, citing the impact on the natural and built environment and the character of the Lane.

Similarly, concerns are raised regarding the use of Scribblestown Lane, Dunsink Lane and Ratoath Road to accommodate development traffic during the early phases of development, with submissions highlighting the potential impacts on existing communities, junction performance and road safety. Some submissions request the reopening of Dunsink Lane to alleviate traffic volumes.

Several submissions refer to funding allocated for the upgrade of Dunsinea Lane and Scribblestown Lane and seek clarification regarding the nature, extent and timing of these works. Related submissions express concern that proposed road widening works, active travel routes and new road connections may affect private lands, property rights and existing access arrangements. Submissions state that consideration should be given

to allowing the upgrade of Dunsinea Lane and Scribblestown Lane to serve as a quietway/ active travel route rather than being a primary vehicular access point for new housing.

Teagasc request that Dunsinea Lane remains a local access road and not become a route serving the proposed residential development. The submission expresses concern that road widening and increased traffic volumes could exacerbate existing congestion and adversely affect the operation and future development of the Teagasc Food Research Centre.

A number of submissions seek improved connections between Dunsink and Navan Road Parkway Station, including the provision of a vehicular link capable of supporting bus and rail interchange functions. It is suggested that a new arterial connection through the Plan area would improve accessibility and support development in the short to medium term. Submissions note that a road connection north of Navan Road Parkway Station was identified in the Dunsink Feasibility Study 2022 but has not been carried forward into the Draft Plan.

Submissions also raise concerns regarding existing road safety conditions, particularly on Ratoath Road and at key junctions throughout the area. Requests are made for road safety audits, traffic calming measures, junction improvements and enhanced pedestrian crossing facilities, particularly in the vicinity of schools, residential areas and community facilities.

Several submissions observe that while large parts of the proposed urban area are planned as low-car or car-free environments, surrounding roads such as Ratoath Road, Dunsink Lane and Scribblestown Lane are expected to accommodate significant levels of traffic movement. It is argued that this could place disproportionate pressure on existing roads surrounding the Plan area.

Concerns are also raised regarding the design of certain proposed streets, with submissions suggesting that some street cross-sections are overly engineered and inconsistent with DMURS principles. Some submissions further contend that the lack of dedicated bus corridors on surrounding arterial routes could reduce the effectiveness of the proposed public transport network.

A number of submissions request that additional transport connections be explored to the west and south of the Plan area, including potential links through Premier Business Park and the National Sports Campus, and from Cappagh Road, in order to distribute traffic more evenly across the network and reduce pressure on existing communities.

The National Orthopaedic Hospital Cappagh (NOHC) welcomes, in principle, the urban design strategy set out in the Draft UAP and supports continued engagement with Fingal County Council regarding proposals for new road connectivity extending south-westwards from Cappagh Road. The submission notes that the proposed road corridor along the north-western boundary of the NOHC lands requires further detailed consideration, particularly in relation to protecting the future operational and development needs of the hospital campus, including the potential provision of a future access point from the north-west.

Transport Infrastructure Ireland broadly supports the Draft Plan but emphasises the need to protect the strategic function, safety and operational performance of the M50 and associated national road infrastructure. TII also highlights the importance of ensuring that future development is accompanied by appropriate mitigation measures, complies with relevant standards and is aligned with the delivery of high-capacity public transport infrastructure. Concerns are raised regarding development in close proximity to the M50 and the need to have regard to the Spatial Planning and National Roads Guidelines for Planning Authorities (2012).

Overall, submissions highlight concerns regarding existing and future traffic congestion, the adequacy of proposed road improvements, road safety, access arrangements and the timing of infrastructure delivery. While many submissions seek additional road capacity and access points to support development, others caution against increasing the strategic role of existing local roads and advocate for prioritising these routes for walking, cycling and local access.

Chief Executive's Response

The concerns raised regarding existing traffic congestion on the surrounding road network, including the N3, M50, Navan Road, Ratoath Road, Scribblestown Lane, Dunsink Lane, Dunsinea Lane, Tolka Valley Road and River Road, and the potential impact of future development on these routes are acknowledged.

The transport strategy for the Draft Dunsink Urban Area Plan is informed by a comprehensive Transport Assessment and a detailed Local Area Traffic Model. The modelling assessed existing and future transport conditions and incorporated committed and permitted development within the wider area, including growth within Ashtown, Pelletstown, Castleknock, Finglas and along the wider Navan Road corridor. The assessment therefore considers the cumulative impacts of planned growth and identifies the transport interventions required to support the phased development of Dunsink.

The Draft Plan adopts a transport-led approach that prioritises public transport, walking and cycling in accordance with national and regional policy. The strategy seeks to minimise reliance on private car travel through the delivery of DART+ West, enhanced bus services, a safeguarded Luas corridor, strategic active travel infrastructure and a connected internal street network. The Transport Assessment demonstrates that, with the delivery of the proposed transport measures, the network can accommodate the planned growth of Dunsink.

The submissions seeking additional strategic road infrastructure, including enhanced access to the M50, N3 and Castleknock areas are noted. While a range of transport options were considered during the preparation of the Transport Assessment, additional motorway access and strategic road capacity were not pursued as they would increase private car dependency, conflict with the Transit-Oriented Development principles underpinning the Plan and undermine national policy objectives relating to the protection of the strategic function, safety and capacity of the national road network as set out in the 'Spatial Planning and National Roads Guidelines for Planning Authorities' (2012).

Concerns regarding congestion at the M50/N3 Interchange, key junction performance and the adequacy of proposed mitigation measures are acknowledged. The Transport Assessment identifies a programme of junction upgrades, traffic management measures and signal optimisation works that will be delivered in tandem with development. Further transport modelling, junction assessments and detailed design work will be undertaken as individual development areas come forward.

The movement strategy for Dunsink is based on a distributed network approach. Strategic development traffic will primarily be accommodated through the planned Southern Link Road and the internal street network rather than being concentrated on existing road. Scribblestown Lane and Dunsink Lane form part of a wider network of access routes which improve network resilience, distribute traffic movements and provide alternative routes for emergency access.

The concerns raised regarding the potential impact of future upgrades to Scribblestown Lane and Dunsinea Lane on the character of these routes, including their natural and built heritage features are acknowledged. The existing rural character of these lanes, including mature trees, hedgerows, stone walls and other heritage features, is recognised as an important element of local distinctiveness. Any future upgrading works will be subject to detailed design and environmental assessment and will seek to retain and protect these features, where practicable, while achieving the necessary improvements in accessibility, safety and sustainable mobility.

The concerns raised regarding the impact of road improvements, active travel routes and new connections on private lands and existing access arrangements are acknowledged. The Draft Plan identifies strategic infrastructure requirements at a high level only. The precise alignment, design and land requirements for future infrastructure projects will be determined at subsequent stages of design, assessment and statutory approval processes. Landowner engagement will form part of these processes and any future proposals will be developed having regard to property access requirements, environmental considerations and the public interest objectives of the Plan.

In relation to Dunsinea Lane, the concerns raised by Teagasc regarding traffic volumes, access arrangements and the operation of the Teagasc Food Research Centre are noted. It is intended that access to existing premises will be retained as part of the upgrade of Dunsinea Lane. The upgrade works will directly facilitate the use of public transport, reducing reliance on private transport to access this area. The detailed design and function of any future upgrades will be subject to a separate consent process, and the Planning Authority will continue to engage with Teagasc and other stakeholders as proposals are developed.

The submissions seeking a vehicular connection between Dunsink and Navan Road Parkway Station are noted. While previous feasibility studies examined a range of transport options, the Draft Plan prioritises active travel and public transport connectivity to Navan Road Parkway Station through the proposed bridge connection. As addressed previously in Section 2.3 of this report, amendments are recommended to confirm that this linkage could accommodate public transport in addition to active travel. Fingal County Council is satisfied that the transport strategy set out in the Draft Plan provides an appropriate framework for the phased development of the lands and that additional strategic vehicular connections are not required at this stage.

The concerns raised relating to road safety on routes such as the Ratoath Road and requests for road safety audits, traffic calming measures, improved junctions and enhanced pedestrian crossing facilities are noted. The Draft Plan provides for a coordinated programme of transport improvements and all significant road and junction projects will be subject to detailed design, Road Safety Audits and compliance with relevant national standards and guidance, including DMURS.

Submissions regarding the design of proposed streets and compliance with DMURS principles are noted. The street hierarchy has been developed to accommodate walking, cycling, public transport and vehicular movement in a balanced manner. Detailed street layouts and cross-sections will be refined through future design stages to ensure that placemaking, movement and safety objectives are appropriately balanced.

The phasing and implementation strategy set out in the Draft Plan supports the delivery of key transport infrastructure in tandem with development as raised in submissions. Chapter 13 of the Draft UAP establishes a phased delivery framework which links development to the provision of supporting transport infrastructure, including the Southern Link Road, public transport enhancements, active travel infrastructure and other transport interventions.

The Draft UAP identifies an indicative road network to support the sustainable development of the Dunsink lands and improve connectivity throughout the area. The alignment of future roads and junction arrangements will be subject to detailed design, environmental assessment, land assembly and statutory consent processes. The Council acknowledges the importance of the National Orthopaedic Hospital Cappagh as a strategic healthcare facility and agrees that the future operational requirements and access needs of the hospital should be considered as part of the detailed design and delivery of the adjoining road infrastructure. Continued engagement with the hospital and relevant stakeholders will be undertaken as development proposals progress.

The observations of Transport Infrastructure Ireland are noted and welcomed. The Draft Plan has been prepared having regard to the Spatial Planning and National Roads Guidelines for Planning Authorities and relevant TII standards. The strategic role, safety and operational integrity of the M50 and N3 corridors will continue to be protected as development progresses.

Chief Executive's Recommendation

No change.

Parking Strategy

Summary of Submissions

Submissions express a range of views on the parking strategy proposed in the Draft Plan. A number of submissions support the proposed approach, noting that reduced parking provision and communal parking arrangements can support more sustainable travel patterns, reduce development costs and improve the quality of the public realm by reducing the dominance of private vehicles within residential areas.

However, many submissions raise concerns that the proposed parking provision, particularly the indicative ratio of 0.3 spaces per dwelling, may be insufficient to meet the needs of future residents, especially during the early phases of development before the full delivery of planned public transport infrastructure, including the proposed Luas extension. These submissions argue that inadequate parking provision could result in

overspill parking within nearby communities, including Ashtown, Finglas and along Dunsinea Lane, creating additional pressure on existing residential areas.

Several submissions request that higher parking standards be applied, including the provision of one or two parking spaces per dwelling together with adequate visitor parking. It is argued that parking provision should reflect likely levels of car ownership and travel behaviour and that the potential impacts of overspill parking, visitor demand and delays to public transport infrastructure require further assessment.

A number of submissions state that the parking standards set out in the Fingal Development Plan provide greater flexibility than those proposed in the Draft Plan. These submissions contend that the communal and remote parking model is relatively untested and may not adequately cater for the needs of future residents. Concerns are also raised regarding the potential impact of reduced parking provision on housing delivery, market attractiveness and development viability. Some submissions therefore request confirmation that the Zone 1 parking standards of the Fingal Development Plan will apply within the plan area and that references to remote parking arrangements be removed or treated as optional.

Some submissions reference experiences from other developments where reduced parking provision has, in their view, contributed to parking pressures, unauthorised parking and negative impacts on the public realm. It is argued that overly restrictive parking standards can result in parking displacement and conflicts within established communities.

Conversely, a number of submissions consider the proposed parking levels to be appropriate in a highly accessible location served by high-quality public transport and active travel infrastructure, provided that these transport improvements are delivered in a timely manner.

Overall, submissions highlight differing views on the extent to which the proposed parking provision is appropriate. While support is expressed for a lower-car development model, many submissions emphasise that reduced parking standards should be closely aligned with the phased delivery of public transport and active travel infrastructure and accompanied by appropriate monitoring and mitigation measures to avoid parking displacement into surrounding areas.

Chief Executive's Response

The Draft Dunsink Urban Area Plan seeks to promote a sustainable pattern of development that prioritises walking, cycling and public transport, while recognising that

parking requirements may change over time as transport infrastructure and services are delivered. The parking strategy has been informed by national and regional planning policy, which supports reduced car dependency and lower parking provision in locations that are, or will be, served by high-capacity public transport and high-quality active travel infrastructure.

The parking strategy contained within the Draft Plan is intended to provide a strategic framework to support a gradual transition towards more sustainable travel patterns over the lifetime of the Plan. The indicative provision of 0.3 parking spaces per residential unit represents a long-term aspiration for a fully developed and highly accessible urban area. It is not intended to apply uniformly across all phases of development irrespective of prevailing transport conditions. This is reflected in Section 5.8 of the Draft Plan which states that "... in the ultimate full build-out scenario Dunsink will operate as a low-car residential development, with a proposed car parking provision of 0.3 parking spaces per residential unit." The Draft Plan recognises that during the transition period for the full build out of public transport infrastructure, there will still be a level of demand for private transport, with parking provision to follow best practice maximum parking standards as per the Fingal County Development Plan and 'Compact Settlements Guidelines for Planning Authorities' and take into consideration access to public transport, local services and future public transport services.

The level of parking to be provided as part of individual development proposals will be considered through the planning application process, having regard to the availability of public transport, active travel connections, travel demand, visitor parking requirements, accessibility needs and the specific characteristics of each development. Detailed parking provision for individual developments will continue to be assessed in accordance with the applicable Development Plan standards, national policy guidance and the circumstances of each planning application.

The Draft Plan also recognises the importance of ensuring that parking provision evolves in tandem with the delivery of public transport and active travel infrastructure. The use of mobility hubs, communal parking arrangements and managed on-street parking forms part of a broader approach to reducing the dominance of private vehicles within the public realm while ensuring that the needs of residents, visitors and businesses are appropriately accommodated.

Concerns regarding the potential for overspill parking in surrounding residential areas are acknowledged. As outlined previously, proposed parking provision will have regard to transport infrastructure delivery, parking demand, travel behaviour and the need to protect the amenity of existing and future communities.

Overall, it is considered that the proposed parking strategy provides an appropriate and flexible framework that balances the objectives of sustainable mobility, compact growth and high-quality placemaking with the parking needs of residents, visitors and businesses throughout the phased development of Dunsink.

Chief Executive's Recommendation

No change.

Mobility Hubs

Summary of Submissions

Some submissions question the feasibility of the proposed mobility hub at Ashtown Station citing space constraints and state that the proposed mobility hub at Navan Road Parkway cannot function properly without a direct vehicular connection into Dunsink. This submission considers Navan Road Parkway station to be the most suitable location for a comprehensive mobility hub, given its greater potential to accommodate high-quality interchange facilities and support access by a range of transport modes.

Chief Executive's Response

The Draft UAP fully recognises the strategic importance of both Navan Road Parkway Station and Ashtown Station as key public transport gateways serving the wider area. The plan proposes a comprehensive mobility hub at Navan Road Parkway Station, supported by a dedicated active travel and public transport connection linking Dunsink to the station and the Royal Canal Greenway. Ashtown Station is also identified as a location for a mobility hub, reflecting its important role within the existing and future public transport network.

The detailed design, layout and operation of both mobility hubs will be developed through subsequent design and planning processes, informed by detailed technical assessment, stakeholder engagement and public consultation. These processes will consider site-specific constraints, access arrangements and interchange requirements to ensure that the mobility hubs are appropriately designed and capable of supporting efficient multi-modal travel.

Chief Executive's Recommendation

No change.

Construction Traffic Management

Summary of Submissions

A number of submissions raised concerns regarding the potential impacts associated with the construction phase of development within the Plan area, particularly in relation to traffic, road safety, residential amenity and environmental effects.

Construction access was a recurring issue. Several submissions objected to the use of Scribblestown Lane, Dunsinea Lane, Ratoath Road and other local roads for construction traffic, citing existing congestion, constrained road conditions and road safety concerns. It was argued that these routes are unsuitable for significant construction traffic and could adversely affect nearby residents, schools, nursing homes, pedestrians, cyclists and emergency vehicle access. Many submissions therefore requested that construction traffic access the lands primarily via the strategic road network, including the N3 and M50. Some submissions suggested alternative construction access routes, while others expressed concerns regarding the suitability of those alternatives.

A number of submissions highlighted the potential impacts of construction traffic on local communities and sought measures to minimise road safety risks, traffic congestion and disruption. Concerns were also raised regarding potential impacts on air quality, noise and vibration levels during the construction period.

Some submissions expressed concerns that proposed construction access routes could affect private property rights and requested that any future construction arrangements carefully consider impacts on adjoining landowners.

Several submissions called for the preparation of a comprehensive Construction Traffic Management Strategy for the overall development area, together with detailed Construction Traffic Management Plans for individual development phases. Submissions requested that these plans include clearly defined haul routes, restrictions on the use of unsuitable local roads, ongoing traffic monitoring and enforcement measures, published thresholds for intervention and appropriate mitigation measures where impacts arise.

Several submissions sought additional controls on construction activities, including restrictions on HGV operating hours, the avoidance of residential frontages where possible, management of cumulative impacts arising from multiple construction sites and the implementation of measures such as wheel-wash facilities, dust suppression and independent monitoring.

Some submissions also requested the inclusion of a specific objective requiring developers to design and construct acoustic barriers or other noise mitigation measures to reduce acoustic impacts associated with construction activities.

Overall, submissions emphasised that construction-related impacts should be carefully managed to ensure that development does not exacerbate existing traffic congestion, adversely affect local residents or vulnerable road users, or compromise accessibility within the surrounding area during the build-out of the Plan lands.

Chief Executive's Response

A number of submissions raise concerns regarding the potential impacts of construction traffic on the surrounding road network, local communities, residential amenity and environmental quality during the build-out of the Dunsink lands. Particular concerns relate to the use of local roads such as Scribblestown Lane, Dunsinea Lane and Ratoath Road for construction traffic, together with potential impacts on road safety, traffic congestion, air quality, noise, vibration and access to homes, schools, community facilities and businesses.

Section 5.10 of the Draft Plan recognises the need to manage construction-related impacts and Objective CM23 requires the submission of Construction Traffic Management Plans for development proposals that have the potential to generate significant construction traffic.

Construction Traffic Management Plans will be required to identify designated construction access routes from the strategic road network into the plan area and demonstrate how impacts on existing communities will be minimised. Construction traffic accessing the Dunsink lands will be directed via approved routes connecting to the strategic road network, including Dunsink Lane where appropriate, rather than through local residential streets. The use of local residential roads for construction traffic will be avoided wherever feasible. This may require a staged upgrading of Dunsink Lane in order to accommodate construction traffic. Currently, the upgrade of the lane is included in Phase 2 of phasing strategy for the Plan lands as set out in Chapter 13 of the Draft Plan. It is recommended that this be amended to include improvements as necessary to accommodate construction vehicles in Phase 1 with the completion of the upgrade in Phase 2.

The concerns relating to road safety, accessibility and impacts on existing communities are acknowledged. Development proposals within the Plan area will be required to demonstrate how construction traffic can be safely accommodated, how impacts on local residents, vulnerable road users, schools, businesses and community facilities will be

minimised, and how access for emergency services will be maintained throughout the construction period.

The Draft Plan also recognises the need to protect residential amenity and environmental quality during the construction phase. Construction Traffic Management Plans and Construction Management Plans will be required to address matters including construction vehicle routing, traffic management measures, pedestrian and cyclist safety, noise and dust mitigation, hours of operation, site access arrangements and environmental controls. It is not considered feasible for the UAP to identify detailed construction routes given the timeframe over which development will occur and need for construction vehicles to access sites where development is occurring, including proposals to existing properties in the area. However, it is considered appropriate that the Plan should indicate that construction traffic should utilise to the strategy road network including the N3, M50 and Dunsink Lane to the greatest extent possible in order to minimise impacts on existing residential areas.

Given the scale and phased nature of development within Dunsink, a coordinated approach to construction traffic management is considered appropriate. The identification of designated construction access routes and the management of cumulative impacts arising from multiple development sites will assist in minimising disruption to surrounding communities and ensuring the safe and efficient delivery of development.

Chief Executive's Recommendation

Amend Section 5.10 Construction Traffic Management on Page 39 as follows:

Insert the following text as the end of the paragraph:

Construction traffic associated with the development of the Dunsink lands shall be directed to utilise designated routes connected to the strategic road network, including the N3, M50 and Dunsink Lane, to the greatest extent possible. The use of local residential streets for construction traffic shall be avoided wherever possible, and in circumstances where this is proposed, it shall be demonstrated to the satisfaction of the Planning Authority that no feasible alternative is available.

Amend Phase 1 infrastructure requirements on P. 120 as follows:

Insert additional bullet point to read:

Improvements to Dunsink Lane as are necessary to accommodate construction traffic.

Amend Phase 2 infrastructure requirements on P. 121 as follows:

Amend text as follows:

Upgrade of Dunsink Lane **completed** and central portion of Southern Link Road confirmed.

3.6. Issues relating to Chapter 6 'Services, Infrastructure and Energy Framework'

FIN-C973-12, FIN-C973-20, FIN-C973-52, FIN-C973-67, FIN-C973-69, FIN-C973-77, FIN-C973-78, FIN-C973-81, FIN-C973-82, FIN-C973-90, FIN-C973-95, FIN-C973-103, FIN-C973-104, FIN-C973-105, FIN-C973-108, FIN-C973-113, FIN-C973-138, FIN-C973-142, FIN-C973-143, FIN-C973-144, FIN-C973-146, FIN-C973-149, FIN-C973-151, FIN-C973-155, FIN-C973-156, FIN-C973-159, FIN-C973-164, FIN-C973-167, FIN-C973-168, FIN-C973-172, FIN-C973-173, FIN-C973-175, FIN-C973-180, FIN-C973-184, FIN-C973-185, FIN-C973-212, FIN-C973-214, FIN-C973-216, FIN-C973-217, FIN-C973-218, FIN-C973-222, FIN-C973-224, FIN-C973-228, FIN-C973-229, FIN-C973-229, FIN-C973-230, FIN-C973-234, FIN-C973-240, FIN-C973-241, FIN-C973-242, FIN-C973-244, FIN-C973-246, FIN-C973-251, FIN-C973-272, FIN-C973-280, FIN-C973-291, FIN-C973-293, FIN-C973-294, FIN-C973-295, FIN-C973-296, FIN-C973-302, FIN-C973-319, FIN-C973-326, FIN-C973-334, FIN-C973-338, FIN-C973-358, FIN-C973-368, FIN-C973-372, FIN-C973-373, FIN-C973-374, FIN-C973-375, FIN-C973-378, FIN-C973-404, FIN-C973-405, FIN-C973-409, FIN-C973-437, FIN-C973-441, FIN-C973-447, FIN-C973-461, FIN-C973-463, FIN-C973-475, FIN-C973-480, FIN-C973-499, FIN-C973-503, FIN-C973-507, FIN-C973-509, FIN-C973-535, FIN-C973-537, FIN-C973-555, FIN-C973-557, FIN-C973-560, FIN-C973-561, FIN-C973-567, FIN-C973-574, FIN-C973-592, FIN-C973-599, FIN-C973-610, FIN-C973-611, FIN-C973-612, FIN-C973-621, FIN-C973-624, FIN-C973-626, FIN-C973-627, FIN-C973-645, FIN-C973-652, FIN-C973-658, FIN-C973-667, FIN-C973-680, FIN-C973-681, FIN-C973-687, FIN-C973-691, FIN-C973-695, FIN-C973-701, FIN-C973-723, FIN-C973-724, FIN-C973-725, FIN-C973-726, FIN-C973-727, FIN-C973-728, FIN-C973-730, FIN-C973-731, FIN-C973-733, FIN-C973-734, FIN-C973-735, FIN-C973-736, FIN-C973-737, FIN-C973-738, FIN-C973-739, FIN-C973-740, FIN-C973-741, FIN-C973-742, FIN-C973-743, FIN-C973-744, FIN-C973-745, FIN-C973-746, FIN-C973-747, FIN-C973-748, FIN-C973-749, FIN-C973-750, FIN-C973-751, FIN-C973-752, FIN-C973-753, FIN-C973-755, FIN-C973-756, FIN-C973-757, FIN-C973-758, FIN-C973-759, FIN-C973-760, FIN-C973-761, FIN-C973-762, FIN-C973-763, FIN-C973-764, FIN-C973-765, FIN-C973-766, FIN-C973-767, FIN-C973-769, FIN-C973-770, FIN-C973-771, FIN-C973-772, FIN-C973-773, FIN-C973-774, FIN-C973-775, FIN-C973-777, FIN-C973-778, FIN-C973-781, FIN-C973-783, FIN-C973-784, FIN-C973-785, FIN-C973-786, FIN-C973-787, FIN-C973-788, FIN-C973-789, FIN-C973-790, FIN-C973-792, FIN-C973-793, FIN-C973-795, FIN-C973-796, FIN-C973-797, FIN-C973-798, FIN-C973-799, FIN-C973-800, FIN-C973-801, FIN-C973-802, FIN-C973-803, FIN-C973-804, FIN-C973-806, FIN-C973-807, FIN-C973-808, FIN-C973-809, FIN-C973-810, FIN-C973-811, FIN-C973-812, FIN-C973-813, FIN-C973-814, FIN-C973-815, FIN-C973-816, FIN-C973-817, FIN-C973-818, FIN-C973-819, FIN-C973-820, FIN-C973-821, FIN-C973-822, FIN-C973-823, FIN-C973-824, FIN-C973-825, FIN-C973-826, FIN-C973-827, FIN-C973-828, FIN-C973-830, FIN-C973-831, FIN-C973-832, FIN-C973-833, FIN-C973-834, FIN-C973-835, FIN-C973-836, FIN-C973-837, FIN-C973-

838, FIN-C973-839, FIN-C973-840, FIN-C973-842, FIN-C973-843, FIN-C973-844, FIN-C973-845, FIN-C973-847, FIN-C973-848, FIN-C973-849, FIN-C973-850, FIN-C973-851, FIN-C973-852, FIN-C973-853, FIN-C973-854, FIN-C973-855, FIN-C973-856, FIN-C973-857, FIN-C973-858, FIN-C973-859, FIN-C973-860, FIN-C973-861, FIN-C973-862, FIN-C973-863, FIN-C973-864, FIN-C973-865, FIN-C973-866, FIN-C973-867, FIN-C973-868, FIN-C973-869, FIN-C973-870, FIN-C973-871, FIN-C973-872, FIN-C973-873, FIN-C973-874, FIN-C973-875, FIN-C973-876, FIN-C973-877, FIN-C973-878, FIN-C973-879, FIN-C973-880, FIN-C973-881, FIN-C973-882, FIN-C973-883, FIN-C973-884, FIN-C973-886, FIN-C973-887, FIN-C973-888, FIN-C973-889, FIN-C973-890, FIN-C973-891, FIN-C973-892, FIN-C973-893, FIN-C973-894, FIN-C973-895, FIN-C973-896, FIN-C973-897, FIN-C973-899, FIN-C973-900, FIN-C973-901, FIN-C973-902, FIN-C973-903, FIN-C973-904, FIN-C973-905, FIN-C973-906, FIN-C973-907, FIN-C973-908, FIN-C973-909, FIN-C973-910, FIN-C973-911, FIN-C973-913, FIN-C973-914, FIN-C973-915, FIN-C973-916, FIN-C973-917, FIN-C973-918, FIN-C973-919, FIN-C973-920, FIN-C973-921, FIN-C973-922, FIN-C973-923, FIN-C973-924, FIN-C973-925, FIN-C973-926, FIN-C973-927, FIN-C973-928, FIN-C973-929, FIN-C973-931, FIN-C973-933, FIN-C973-934, FIN-C973-935, FIN-C973-936, FIN-C973-937, FIN-C973-938, FIN-C973-939, FIN-C973-940, FIN-C973-941, FIN-C973-942, FIN-C973-943, FIN-C973-944, FIN-C973-945, FIN-C973-946, FIN-C973-947, FIN-C973-948, FIN-C973-949, FIN-C973-950, FIN-C973-951, FIN-C973-952, FIN-C973-953, FIN-C973-954, FIN-C973-955, FIN-C973-956, FIN-C973-957, FIN-C973-958, FIN-C973-959, FIN-C973-960, FIN-C973-961, FIN-C973-962, FIN-C973-963, FIN-C973-964, FIN-C973-965, FIN-C973-966, FIN-C973-968, FIN-C973-969, FIN-C973-970, FIN-C973-971, FIN-C973-972, FIN-C973-973, FIN-C973-974, FIN-C973-975, FIN-C973-976, FIN-C973-976, FIN-C973-977, FIN-C973-978, FIN-C973-979, FIN-C973-980, FIN-C973-981, FIN-C973-983, FIN-C973-984, FIN-C973-987, FIN-C973-988, FIN-C973-989, FIN-C973-990, FIN-C973-991, FIN-C973-992, FIN-C973-993, FIN-C973-994, FIN-C973-995, FIN-C973-997, FIN-C973-998, FIN-C973-999, FIN-C973-1000, FIN-C973-1002, FIN-C973-1004, FIN-C973-1005, FIN-C973-1006, FIN-C973-1007, FIN-C973-1008, FIN-C973-1009, FIN-C973-1010, FIN-C973-1011, FIN-C973-1012, FIN-C973-1013, FIN-C973-1015, FIN-C973-1016, FIN-C973-1018, FIN-C973-1020, FIN-C973-1021, FIN-C973-1022, FIN-C973-1023, FIN-C973-1024, FIN-C973-1025, FIN-C973-1026, FIN-C973-1027, FIN-C973-1028, FIN-C973-1029, FIN-C973-1031, FIN-C973-1032, FIN-C973-1033, FIN-C973-1034, FIN-C973-1035, FIN-C973-1036, FIN-C973-1037, FIN-C973-1038, FIN-C973-1039, FIN-C973-1041, FIN-C973-1042, FIN-C973-1044, FIN-C973-1045, FIN-C973-1046, FIN-C973-1049, FIN-C973-1050, FIN-C973-1052, FIN-C973-1053, FIN-C973-1054, FIN-C973-1055, FIN-C973-1058, FIN-C973-1060, FIN-C973-1061, FIN-C973-1062, FIN-C973-1063, FIN-C973-1064, FIN-C973-1065, FIN-C973-1067, FIN-C973-1068, FIN-C973-1070, FIN-C973-1071, FIN-C973-1072, FIN-C973-1073, FIN-C973-1075, FIN-C973-1076, FIN-C973-1078, FIN-C973-1079, FIN-C973-1080, FIN-C973-1082, FIN-C973-1083, FIN-C973-1084, FIN-C973-1086, FIN-C973-1088, FIN-C973-1090, FIN-C973-1091, FIN-C973-1092, FIN-C973-1093, FIN-C973-1094, FIN-C973-1095, FIN-C973-1096, FIN-C973-1098, FIN-C973-1100, FIN-C973-1101, FIN-C973-1102, FIN-C973-1103, FIN-C973-1104, FIN-C973-1105, FIN-C973-1106, FIN-C973-1107, FIN-C973-1108, FIN-C973-1109, FIN-C973-1110, FIN-C973-1112, FIN-C973-1113, FIN-C973-1114, FIN-C973-1115, FIN-C973-1116, FIN-C973-1117, FIN-C973-1118, FIN-C973-1119, FIN-C973-1120, FIN-C973-1121, FIN-C973-1124, FIN-C973-

1126, FIN-C973-1127, FIN-C973-1129, FIN-C973-1130, FIN-C973-1131, FIN-C973-1132, FIN-C973-1133, FIN-C973-1134, FIN-C973-1135, FIN-C973-1136, FIN-C973-1137, FIN-C973-1139, FIN-C973-1140, FIN-C973-1141, FIN-C973-1143, FIN-C973-1144, FIN-C973-1145, FIN-C973-1146, FIN-C973-1147, FIN-C973-1148, FIN-C973-1149, FIN-C973-1151, FIN-C973-1152, FIN-C973-1153, FIN-C973-1154, FIN-C973-1156, FIN-C973-1156, FIN-C973-1157, FIN-C973-1159, FIN-C973-1160, FIN-C973-1161, FIN-C973-1162, FIN-C973-1163, FIN-C973-1164.

Infrastructure Capacity

Summary of Submissions

A number of submissions raise concerns regarding the capacity of existing water, wastewater, flood management and other utility infrastructure in the area, noting that current constraints may be further affected by the proposed level of development. Submissions highlight that the provision of key infrastructure must be delivered in tandem with development, aligned with firm commitments, funding and completion timelines for key upgrades. Support was expressed for a co-ordinated plan led approach but also a request that delivery responsibilities and sequencing be made clear.

Chief Executive's Response

The Fingal Development Plan 2023-2029 and the Draft Dunsink Urban Area Plan promote a plan-led and infrastructure-led approach to growth with development supported by the necessary infrastructure and services. Specifically, the Draft UAP provides for a phased approach to development, enabling the timing and scale of development to be aligned with the provision and capacity of essential infrastructure. This approach seeks to ensure that growth is appropriately co-ordinated with investment in water, wastewater, energy and other utilities, with infrastructure provision progressing in tandem with development.

The Draft Plan identifies the requirement for new and upgraded infrastructure to facilitate future development, with infrastructure to be delivered in tandem with the phased development of the plan lands. Specifically, Chapter 13 (Phasing of Development) of the Draft Plan outlines the infrastructure provision required to support development in tandem with the established sequencing of development ensuring that necessary infrastructure is delivered in tandem with each phase of development to ensure sustainable growth.

The Council will continue to liaise with the relevant infrastructure providers to ensure that development advances in tandem with the delivery and capacity of the necessary infrastructure at strategic level and through the Development Management process.

Chief Executive's Recommendation

No change.

Water Infrastructure – Water Supply and Foul Drainage

Summary of Submissions

A number of submissions identified water supply and foul drainage capacity as critical constraints and highlighted the need to use Fingal networks to avoid pressure on adjoining areas. Concerns were also expressed that the existing network 9c sewer may have no remaining capacity for additional large-scale development and that future regional capacity may already be committed and confirmation was required in this case. One submission suggested the use of an independent tertiary wastewater treatment facility to serve the plan area. Generally, submissions sought agreed, funded and timely water service upgrades aligned with phasing.

The submission from Uisce Éireann as a Prescribed Body supports the principle of sustainable, infrastructure-led growth within the plan lands. It is highlighted that the successful delivery of the scale of development proposed will require substantial and co-ordinated investment in water and wastewater infrastructure and ongoing collaboration between Fingal County Council and Uisce Éireann to ensure that water services infrastructure is planned, funded and delivered in tandem with development.

The submission highlights that the initial anticipated phase of housing units can be accommodated subject to some local upgrades, however, full delivery of up to 18,500 homes (Phases 2 and 3) will require the delivery of both the Water Supply Project (WSP) and the Greater Dublin Drainage Project (GDD). It is noted that the WSP is at planning approval stage with no determined timeline for delivery. It is also highlighted that the GDD has secured planning approval and is currently anticipated to be operational by 2032, however, it is noted that timelines may be subject to change prior to the commencement of construction. The promotion of water efficiency measures in the Draft Plan is welcomed which is considered particularly important in the interim, until delivery of the Water Supply Project.

The submission highlights that non-domestic uses can impact water demand and wastewater loading forecasts and information in terms of proposed non-domestic uses is beneficial to inform future network design calculations. It is noted that any wayleaves and diversions in existence on the plan lands will need to be maintained for access purposes and potential future upgrades. It is also noted that an application for a diversion via the Connection Services Section can be made on the Uisce Éireann website.

It is highlighted that Uisce Éireann may require the reservation of corridors for future strategic watermains where required and early engagement with Uisce Éireann regarding network reinforcement and system upgrades is considered necessary in this regard.

Objectives SIEF 01 SIEF02, SIEF03, SIEF04 which support water services infrastructure in tandem with housing delivery in the Draft Plan are welcomed.

Given the dependency of future housing development on the provision of strategic water services infrastructure in the plan area, continued engagement and co-ordination between Fingal County Council and Uisce Éireann is considered essential to ensure alignment between housing delivery and the timely provision of the necessary infrastructure. Uisce Éireann welcomes continued engagement with Fingal County Council in the finalisation and implementation of the Draft Plan.

Chief Executive's Response

As set out in above, the Draft Plan identifies the requirement for new and upgraded infrastructure to facilitate future development, with infrastructure to be delivered in tandem with the phased development of the plan lands. The Council will continue to liaise with the relevant infrastructure providers to ensure that development advances in tandem with the delivery and capacity of the necessary infrastructure at strategic level and through the development management process.

The comments as set out in Uisce Éireann's submission in relation to water services capacity particularly relating to the early phase of development where there are no significant water services constraints identified are acknowledged and welcomed.

The need for both the Water Supply Project (WSP) and the Greater Dublin Drainage (GDD) projects to facilitate the full build of the plan area is acknowledged. Both the Water Supply Project (WSP) and the Greater Dublin Drainage (GDD) projects are strategic infrastructure necessary to accommodate future development in the Dublin Metropolitan Area and the wider region, including the plan lands, in a co-ordinated and sustainable manner. The current planning and construction status updates for both the WSP and GDD and projects are also noted.

Considerations relating to wayleave/diversion requirements, the need for strategic corridor preservation, future connection permissions and support for water services infrastructure and phasing objectives as set out in the Draft Plan are noted. The Draft Plan sets out that this area would develop on the basis of mixed-use residential-led development. There are 10 no. sites identified for future schools. Supporting commercial,

community, healthcare uses are also envisaged, however, employment numbers and the quantum of floorspace will be determined at the development management stage.

The commitment from Uisce Éireann for continued engagement with Fingal County Council to advance new or upgraded networks is welcomed. Fingal County Council will continue to engage with Uisce Éireann and other relevant stakeholders, to support the timely delivery of new or updated water services infrastructure required to facilitate the phased delivery of the plan lands and work towards the identification of potential synergies in the delivery of new infrastructure, through the strategic planning and development management processes, to facilitate the sustainable growth of the plan area.

Chief Executive's Recommendation

No change.

Sustainable Water Management

Summary of Submissions

The submission from the OPW as a Prescribed Body, welcomes the Sustainable Drainage Strategy prepared as part of the Draft Plan which sets out the suitable Sustainable Drainage Systems (SuDS) techniques, as well as demonstrating on maps the preferred approach for integrating multi-functional SuDS components within the plan area.

A number of submissions advocate a nature-based surface-water management approach, using swales, surface attenuation basins and constructed wetlands. This approach was linked to the ecological value of established hedgerows, grassland, scrub and adjoining river and canal corridors, and to protecting water quality. It was also requested that planning applications include detailed construction-phase surface-water treatment plans identifying measures such as silt screens and attenuation ponds, implementation timelines and monitoring post development.

Chief Executive's Response

The support for the Sustainable Drainage Systems (SuDs) approach is acknowledged and welcomed. Appendix 4 Sustainable Drainage Strategy has been prepared to inform the Draft Plan and sets out an integrated approach to surface water management, including the use of nature-based solutions and SuDs measures having regard to relevant national guidance. This approach is particularly relevant to the ecological value of the existing ecological assets with the plan lands with the design and management of surface water infrastructure providing an opportunity to protect and enhance these assets and contribute to the overall green infrastructure network.

Objectives SIEF05–SIEF10 of the Draft Plan promotes a comprehensive, above-ground nature-based 'Treatment Train' approach to treat and attenuate surface water runoff at source. Below-ground attenuation tanks are strictly restricted to a last-resort option.

Development proposals will be required to demonstrate compliance with the plan's robust surface water management objectives through the Development Management process. Specifically, proposals will be required to demonstrate how surface water will be managed through the implementation of appropriate SuDs measures, having regard to the site's characteristics, receiving environment and ecological sensitivities including long-term management, to ensure that water quality, biodiversity and amenity functions are retained.

Section 3.18 of this report addresses the issues raised specifically in respect of the Sustainable Drainage Strategy and outlines a number of recommendations in this regard.

Chief Executive's Recommendation

No change.

Flood Risk Management

Summary of Submissions

Submissions sought flood-management infrastructure to be delivered alongside development. Existing trees, hedgerows, grasslands, streams and floodplains were described as important natural attenuation features, with concern that their removal could increase flood risk locally and downstream. Reported experience of flooding, uncertainty regarding infrastructure capacity and potential loss of natural floodplain areas underpinned requests to retain these features and integrate nature-based drainage into the development framework. Clarity is required on how flood risk is addressed in the Plan.

Chief Executive's Response

A Strategic Flood Risk Assessment (SFRA) was undertaken to inform the preparation of the Draft Plan and is included as Appendix 3. The SFRA assessed the implications of flood risk and provides a strategic framework for the management of flood risk for the development of the plan area. The Draft Plan recognises that the protection of natural heritage assets, including riparian corridors and other natural drainage features can make an important contribution to flood risk management by providing space for natural storage, attenuation and conveyance. This is particularly relevant along the River Tolka and its associated floodplain, where the retention of natural floodplain areas can assist in managing any potential flooding and contribute to wider climate resilience, in addition to protecting biodiversity and ecological connectivity. The protection of these areas is

therefore an important component of an integrated approach to flood risk management for the plan area and is consistent with the relevant flood-risk management provisions of the Fingal Development Plan.

Future development proposals will be required to have regard to the SFRA and demonstrate that development will not result in an unacceptable increase in flood risk or adversely affect the functioning of the natural floodplain areas and other natural drainage features.

Section 3.17 of this report addresses the issues raised specifically in respect of the SFRA and outlines a number of recommendations in this regard.

Chief Executive's Recommendation

No change

Electricity

Summary of Submissions

The submission from the ESB as a Prescribed Body, welcomes the preparation of the Draft Plan and supports the ambition and overarching objectives of compact, sustainable growth and regeneration, for this strategic landbank within the Dublin Metropolitan Area, which represents a significant opportunity to accommodate strategic growth at scale, while supporting national housing delivery, climate objectives and sustainable transport investment, in line with relevant national, regional and local policy and objectives.

The ESB in their submission note that the existing network can provide some capacity for the initial phases of development subject to detailed technical assessment, however they advise that the full build of the plan area will require significant reinforcement of the distribution network in the area.

The ESB considers the development of Dunsink is dependent on the timely delivery of enabling infrastructure, particularly electricity transmission and distribution infrastructure, safeguarding and future proofing of ESB network assets, phased development with network capacity and substantial ongoing investment in providing decarbonised electricity and resilient infrastructure. In this regard, an infrastructure, plan led and collaborative approach to electricity infrastructure provision is considered necessary to support planned growth at Dunsink. The ESB welcomes the inclusion of a dedicated Services, Infrastructure and Energy Framework within the Draft Plan.

The ESB in their submission highlights their commitment to a low-carbon future through investment in smart networks and renewable energy, having regard to relevant policy

provisions at national, regional and local level, to facilitate sustainable growth and a transition to a low carbon future.

The ESB recommends the following is considered prior to the finalisation of the Draft Plan to support the sustainable and planned growth of the plan area:

- Acknowledgement of the need for significant future electricity network reinforcement to support the scale of development envisaged across the plan area;
- Requirement for two future 110kV/MV substations and approximately 30-40 secondary substations, together with associated medium-and low-voltage distribution infrastructure required to serve the plan area. In this regard, ESB Networks welcome early engagement with Fingal County Council regarding potential substation and route corridor identification along the Strategic Energy Infrastructure Corridor with 0.5 has of land and safeguarding accordingly;
- Protection of strategic electricity cable corridors, wayleaves and existing network assets from inappropriate development that could compromise their operation, maintenance, or future expansion;
- Rewording of Objective SIEF12 to allow ESB Networks to specify voltage levels during detailed network planning and design stage;
- Support for the continued assessment of opportunities to underground existing high-voltage electricity infrastructure within the Plan area, where technically feasible and economically justified, while safeguarding the operational integrity, resilience and future development requirements of the strategic electricity network through ongoing engagement with ESB Networks. In this regard, ESB welcomes the inclusion of Policy SIEF13 in the Draft Plan;
- Link future development phases to the delivery of electricity infrastructure, ensuring that housing, employment and community development is aligned with available network capacity and planned reinforcement works;
- A co-ordinated and plan led approach to EV infrastructure to support low-carbon choices, reducing emissions and accommodating future electricity demand in a sustainable and efficient manner;
- Recognise the strategic relationship between electricity and digital infrastructure and support a co-ordinated approach to infrastructure delivery; and

- Support ongoing coordination between Fingal County Council, ESB Networks, EirGrid and other infrastructure providers to facilitate the integrated planning and timely delivery of enabling infrastructure, throughout the lifetime of the Plan.

The ESB welcomes continued engagement with Fingal County Council and other relevant stakeholders as the Draft Plan advances, to ensure that plan objectives are achieved in a co-ordinated and plan led manner to support planned and sustainable growth.

Chief Executive's Response

The supportive submission from the ESB is welcomed. The comments set out in their submission which note that the existing network can provide some capacity to accommodate the initial phases of development, subject to detailed technical assessment, are acknowledged and welcomed. The significant reinforcement of the distribution network to facilitate the full build of the plan area is acknowledged.

The Draft Plan at Section 6.7 is explicit in acknowledging that the provision of reliable and resilient electricity infrastructure is essential to support the scale of development envisaged within the Plan lands. The Draft Plan also recognises that this planned development will require a coordinated approach to electricity infrastructure planning, ensuring that adequate network capacity and distribution infrastructure are delivered in tandem with the phased development of the area.

The need for critical upgrades and capacity enhancements to address grid constraints and facilitate renewable energy integration aligns with the strategic objectives of the Fingal Development Plan. It is also noted that utility infrastructure is permissible or open for consideration in all zoning objectives across the County and, consequently in Dunsink, within Chapter 13 (Land Use Zoning) of the Development Plan and where development proposals would be assessed in accordance with the relevant policies and objectives of the Development Plan, including normal standard criteria, through the development management process.

The Draft Plan is explicit in acknowledging that full delivery of the entirety of the Plan lands will require adequate 110/20 kV primary substation capacity and highlights that this may be achieved through the expansion of existing infrastructure or the provision of additional primary electricity infrastructure, subject to detailed network assessment by ESB Networks. The Draft Plan also acknowledges that the provision of new or expanded primary substation capacity will enable the development to connect to the wider electricity transmission network and ensure sufficient capacity to support long-term

development. Figure 6.3 of the draft Plan provides an indicative electricity infrastructure layout across the Plan lands.

In the interests of clarity, it is recommended that Figure 6.3 of the Draft Plan be amended to acknowledge and correct a minor graphical error which currently suggests a second potential location for a 110kv substation to the north of the proposed Regional Park. The amended figure shall clearly identify the proposed undergrounding of the relevant infrastructure and remove any ambiguity regarding the location of the substation.

In respect of the second potential location for a 110kv substation, it is considered that the optimal location would be within the Dunsink West development area. This area forms part of the longer-term Phase 3 development lands and would therefore provide greater opportunity for the location of the substation to be considered comprehensively as part of the future development of the area. This approach would also allow the substation location to be considered in the context of other major planned development and infrastructure, including the proposed LUAS.

Objective SIEF11 of the Draft Plan seeks to support the safeguarding of land and corridors to accommodate primary substation capacity either through expansion of existing infrastructure or delivery of additional primary infrastructure, subject to ESB Networks agreement. The Council will continue to engage with the ESB to ensure that sufficient land and appropriate infrastructure requirements for future electricity network capacity are identified and safeguarded at the appropriate stage of development process.

ESB concerns regarding objective SIEF12 are acknowledged and it is proposed to amend this objective in this regard.

Objective SIEF13 of the Draft Plan seeks to promote the undergrounding of overhead high-voltage electrical infrastructure where possible, subject to feasibility and agreement with ESB Networks.

The Draft Plan at Section 5.9 (Mobility Hubs) and Figure 5.14 is explicit in supporting and facilitating the provision of co-ordinated EV charging network within the plan area by integrating charging infrastructure into strategically located mobility hubs where different transport modes and services converge. Locating chargers at these hubs makes EV charging more accessible and convenient, while enabling users to combine charging with other activities such as public transport, cycling, shared mobility or local services. The Development Plan also includes a number of requirements for EV charging infrastructure to be incorporated into new development proposals, ensuring that EV charging provision is considered from the outset of the planning and design process in

development proposals. Section 14.17.10 of the Fingal Development Plan refers in detail to this.

Objective IUO54 of the Fingal Development Plan supports and facilitates the sharing and co-location of digital connectivity infrastructure.

The Planning Authority recognises the value of early engagement with utility providers including the ESB in the design and delivery of infrastructure projects to facilitate development. The Fingal Development Plan includes specific policy IUP29 in this regard.

Chief Executive's Recommendation

Amend objective SIEF12 at page 45 as follows:

Require development proposals to integrate a coordinated ~~20-kV~~ ring main backbone and associated secondary substations, **with the voltage level and network configuration to be determined by ESB Networks, and to be** delivered in tandem with development and integrated with urban design, flood risk management and green infrastructure.

Amend Figure 6.3 at page 44 as follows:

Clearly identify the proposed under grounding of the relevant infrastructure with the northern section of the proposed Regional Park lands to remove any ambiguity regarding the location of primary substation infrastructure.

Gas – Low Carbon Heat Solutions

Summary of Submissions

A number of submissions consider that the scale and compact nature of the planned strategic growth envisaged within the plan area provides a strong opportunity for district heating, consistent with relevant national, regional and local policy. The benefits of district heating against air source heat pump solutions are highlighted.

Submissions highlight the potential to utilise waste heat from nearby data centres in the Dublin 15 area and reference existing district heating initiatives and emerging opportunities as well as examples of district heating schemes and best practice approaches in Ireland and in Europe. Some submissions note that expanding the proposed Blanchardstown District Heating Scheme to include the plan area would improve commercial viability and help to reduce overall costs to consumers.

Some submissions express concern that the Plan's energy strategy places a strong emphasis on individual electric heat pumps while treating district heating primarily as an option where it can be demonstrated to be technically, environmentally and economically

feasible. It is suggested that this approach may not fully recognise the potential viability and wider benefits of district heating at the scale proposed and represents a missed opportunity.

Development should be connection-ready through low-temperature emitters, plant space, risers and stubs. A published techno-economic feasibility and zoning study, consideration of relevant legislation and regulation and consumer protection, and review of the longer-term phasing of district heating were also sought. A potential connection to Sport Ireland, including its possible contribution to the system, was identified for examination.

Chief Executive's Response

The Fingal Development Plan 2023-2029 currently provides a policy framework which supports district heating as part of the transition to a low carbon energy system. Specifically, policy CAP18 actively encourages low carbon and highly efficient district heating and decentralised energy systems, including systems utilising renewable energy and waste heat recovery. Policy CAP19 supports the potential of district heating in Fingal while policy CAP20 recognises the potential for waste heat recovery from facilities such as data centres on adjoining or nearby sites. These policies are reinforced by the development management standards in Section 14.21.2 where district heating and waste heat recovery systems will be supported and requires future applications to have regard to the future potential for district heating. Taken together, these provisions provide the basis for considering district heating at an area-wide and strategic scale, while retaining flexibility to assess the most appropriate energy solution having regard to technical and environmental considerations.

The Draft Plan at Sections 6.8, 6.10 and 11.2 in addition to objectives SIEF20 and CA04 also contains provisions to support the development of district heating infrastructure and the potential utilisation of waste heat from adjoining data centres. This approach supports the efficient use of available energy resources, facilitates the integration of lower-carbon heat sources into the energy system, contributing to the overall sustainability and energy efficiency of the planned development.

Accordingly, the existing Development Plan and Draft Plan provisions are considered to provide robust support for district heating solutions including in areas of significant planned growth and in proximity to potential heat sources such as Dunsink. The requirement for development proposals to assess the feasibility and future compatibility of district heating also facilitates consideration of such infrastructure at an early stage of the development process. The phasing strategy of the Draft Urban Area Plan requires that development in phases 2 and 3 should future proof all residential development and

potential major heat users to connect into future district heating system. The comments regarding facilitating a district heating system from the outset of the development of this area are noted. As set out above, the provisions of the Draft Plan strongly support the provision of district heating within the Plan area. It is therefore considered that the phasing proposals set out in Chapter 13 should be amended to include provision for making development in Phase 1 future proofed for district heating where it would be appropriate to do so.

Chief Executive's Recommendation

Amend Section 13.2 on page 120 as follows:

Include an additional bullet point in Phase 1:

Future proof all residential development and potential major heat users to connect into future district heating system as appropriate.

Telecommunications

Summary of Submissions

A number of submissions support the provision of coordinated and shared telecommunications and digital infrastructure where possible, to ensure the creation of a connected and resilient community and minimise the number of masts and antenna locations, avoiding locations near schools and places where people congregate.

Chief Executive's Response

The Draft Plan at Section 6.9 supports the provision of coordinated telecommunications infrastructure to ensure efficient delivery. This is consistent with national policy objectives supporting the sustainable development of digital connectivity and the efficient use of land and infrastructure. Proposals for such infrastructure will be assessed in accordance with relevant planning criteria within the Development Management Process which includes statutory public consultation stages, where issues of concern may be raised.

Chief Executive's Recommendation

No change.

Energy and Climate Change

Summary of Submissions

A number of submissions promote greater use of renewable and locally generated energy within future development, including the provision of solar energy infrastructure and the application of the circular economy approach.

Chief Executive's Response

The Draft Plan at Chapter 6 and Section 6.10 supports the transition to a low-carbon and climate-resilient form of development and the integration of renewable and low-carbon energy technologies within future development.

Chapter 11 of the Draft Plan promotes a low-carbon and climate resilient approach by supporting measures that reduce greenhouse gas emissions, improve energy efficiency and increase resilience to the impacts of climate change. It embeds circular economy principles by encouraging the efficient use of resources and waste prevention towards a more sustainable and resource efficient economy.

The incorporation of renewable energy measures will be considered as part of the design and assessment of individual development proposals through the development management process, having regard to the relevant sustainability policies, objectives and applicable standards.

Chief Executive's Recommendation

No change.

Landfill Aftercare

Summary of Submissions

The submission from the EPA, a Prescribed Body, notes that Fingal County Council has been issued a licence for the closure and restoration of areas previously landfilled at Dunsink Landfill. The EPA supports the repurposing of closed landfills for public amenities provided that waste licence conditions are adhered to. It is noted that any changes which require the EPA's approval under the licence, or any planned amendments to the site's restoration and aftercare plan, must be submitted by the Council to the EPA for approval. The Council is also reminded of the requirement to maintain all monitoring infrastructure at the landfill and to ensure that any monitoring and necessary remedial actions are carried out, as required by the licence.

A number of submissions express support for the proposed Regional Park on the former landfill lands while seeking greater clarity on the long-term governance, funding, maintenance and environmental management and remediation arrangements having regard to relevant legislative requirements, to ensure that the park can be safely and effectively managed over the long-term, while continuing to meet the requirements of the EPA licence.

Other submissions raise concerns regarding development of the proposed Regional Park on the former landfill lands and the proposals for residential development in the vicinity of the former landfill.

Concerns include potential risks to human health, public safety as well as potential environmental impacts arising from the residual landfill materials and associated gas migration and leachate. Concerns are also raised regarding potential impacts on watercourses and soils, soil stability and the potential for all these issues to affect existing and future residents and residential amenity in the area. Potential effects of landfill leachate and contamination on groundwater and surface water reinforced calls for comprehensive assessment, monitoring and transparent reporting.

Submissions question the suitability of the area for development and seeks a precautionary approach until sufficient evidence is available to demonstrate that development can occur without unacceptable risks to public safety, human health and the environment.

A number of submissions request that a comprehensive gas risk assessment and appropriate programme of testing be undertaken by a suitably qualified independent assessor, extending beyond the immediate plan area to the wider area where appropriate. They also seek further information on the current condition and management of the former landfill, including the status and effectiveness of capping, landfill gas and leachate management, environmental monitoring, and the status of any ongoing or planned remediation and long-term monitoring and aftercare arrangements. A number of submissions also request that relevant environmental monitoring data and information on the long-term management and after care of the former landfill be made publicly available and early delivery of community benefit commitments.

In addition, some submissions propose the provision of an appropriate buffer between the former landfill lands and planned development, in conjunction with detailed mapping of the former landfill, based on a topographical survey with the intention of all these measures addressing potential public safety, environmental and residential amenity considerations.

Overall, the concerns raised focus on ensuring that the condition and risks associated with the former landfill are fully understood, independently assessed and appropriately managed, before development proceeds, with adequate safeguards in place to protect human health, the environment and residential amenity over the long term. Some submissions request a landfill remediation and long-term monitoring strategy be included in the plan.

Chief Executive's Response

Dunsink landfill accepted waste from 1976 till 1997. The Dunsink landfill was built and operated before the EU landfill directive came into force. However, the landfill site was chosen based on its favourable geology for groundwater protection and gas migration. The waste accepted was household waste, non-hazardous industrial and commercial waste and construction waste for cover and basal lining.

Since its closure in 1997, aftercare of the landfill has operated under a licence issued and regulated by the Environment Protection Agency. The landfill is monitored for air quality, surface water quality, groundwater and landfill gas and results are compared against licence limits and other environmental standards. This process allows for monitoring of emissions and the early identification of any potential exceedances in the limits specified in the licence. Monitoring results are made available on the Environmental Protection Agency's website. The licence monitoring process is considered to be sufficient in terms of identifying any potential risk associated with the former landfill and consequently, further quantitative risk assessments are not considered necessary.

The EPA's submission noting the Council's role and responsibilities in the implementation of the waste licence conditions is acknowledged and welcomed.

No housing or building is proposed on the waste body. The risk of gas on the housing development lands is based on standard assessment methods. These classify risk from 1-7 with 1 being low and 7 high. The assessment is made by measuring gas generation and flow in gas monitoring points. These monitoring wells on the south side of Dunsink lane have been in place for many years and are regularly monitored and the results are in the lowest risk category not requiring any measures to protect against gas.

Volatile Organic Compounds (VOC) (including methane) are monitored at the landfill site surface. There are isolated levels above trigger points particularly in a small area along the motorway to the west and investigations are ongoing at the moment in this area to see if the gas extraction in this area requires upgrading or the clay cover requires improvement.

The Council was required to undertake a Hydrological Review/Technical Assessment of the landfill for the Environment Protection Agency in 2015. The outcome concluded that the *"groundwater monitoring programme indicates that the facility is generally good"* and *"It is considered that indirect discharges to groundwater are not significant in volumes or effect"*. The monitoring results for the period 2023 to 2026 show no detection of List I & II (200 compounds monitored) hazardous substances. Most parameters measured were below

detection limits. Where substances were detected, they were below the limits for treated drinking water.

Leachate from the landfill is collected in pipes below the waste and is pumped to the leachate lagoon and then pumped to the Uisce Eireann sewer for treatment at Ringsend Wastewater Treatment Works.

No excavation of the landfill is proposed for buildings, pipelines and roads. Pathways may be constructed on top of the clay capping as part of the creation of the regional park. Pipelines and excavation close to the landfill but outside the waste area may have to take precautionary measures to prevent gas migration when backfilling trenches and cuttings. This typically involves backfilling with impermeable material and would not serve as a constraint to developing the area.

Chief Executive's Recommendation

No change.

3.7. Issues relating to Chapter 7 'Green Infrastructure and Natural Heritage

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Biodiversity

Summary of Submissions

Submissions received reflect a range of views in relation to natural heritage and biodiversity within the plan lands.

A number of submissions support the proposals in the Draft Plan for the protection and enhancement of existing biodiversity features in the plan area. Submissions emphasise that existing environmental assets should shape the future growth of the plan area through a landscape-led approach having regard to European, national, regional and local policy provisions relating to biodiversity protection and enhancement, including the EU Nature Restoration Plan and National Biodiversity Plan.

The submission from the Heritage Council as a Prescribed Body commends the proposed Green Infrastructure Strategy as set out in the Chapter 7 and reinforces the Draft Plan approach to the protection and enhancement of existing biodiversity and natural

heritage assets, affirming that these principles form a fundamental basis for the plan's landscape led strategy and overall spatial framework and considers that the development of Dunsink presents an opportunity to demonstrate heritage led placemaking from the outset.

The submission welcomes the biodiversity benefits of the proposed Regional Park on the former landfill lands and notes that their ecological value will depend on ongoing management and maintenance. In this regard, it is recommended that objective GI10 be amended to include provisions for the long-term management and maintenance of this area.

The submission also welcomes the Draft Plan's emphasis on strengthening ecological connections through a number of objectives in Chapter 7. It is noted that the retention of ecological assets should be the first step in the sequential approach to managing nature in the development process and recommends that the natural heritage section of the plan be supported by a detailed habitat map, prepared in accordance with Heritage Council habitat identification and classification guidance to include habitats, trees, hedgerows and other features as per Table 5.3 of the Environmental Report. The submission also recommends undertaking a survey of mature trees to identify specimens and groups suitable for Tree Preservation Orders.

A number of submissions highlight the ecological, biodiversity and landscape value of local natural heritage assets in the plan lands including trees, hedgerows, grasslands, field boundaries, habitats and their species and the local waterways of the River Tolka Valley, the Royal Canal and the Scribblestown Stream.

Submissions also highlight the biodiversity, ecological, landscape, cultural and amenity value of Scribblestown Lane and Dunsinea Lane with some supportive photographs, noting their contribution to local character, heritage, culture and community well-being. Submissions highlight the importance of safeguarding these lanes and their associated features in the development of the plan lands with some submissions recommending biodiversity protection measures, environmental impact assessment of any proposed works with a particular emphasis on flora and fauna relating to Scribblestown Lane as well as the application of a preservation order to Scribblestown Lane, in order, to protect its character and heritage value.

Submissions emphasise the importance of retaining and protecting these natural assets as part of the development of the lands particularly when taken in the context of cumulative greenfield development in the wider area. Some submissions therefore advocate urban consolidation and the regeneration of vacant properties in established

centres, rather than outward expansion, on the basis that this would reduce pressure on ecological corridors.

Submissions emphasise that cumulatively these natural heritage assets provide important biodiversity, ecological and landscape functions, supporting a range of habitats and species including protected species such as varieties of bats, birds, otter and salmon and supporting local biodiversity networks, ecological corridors and landscape permeability for species as well as contributing to environmental sustainability, resource efficiency and climate resilience and providing recreation, amenity, education and well-being opportunities.

Submissions highlight that these natural heritage assets comprise an important element of the green infrastructure network strengthening ecological corridors, protecting biodiversity and reinforcing landscape connectivity across the local and wider region and require long-term management and environmental monitoring of these environmental resources as well as pollution control and seasonal restrictions during the construction phase, to ensure sustainable urban development. In this regard, it is highlighted that cumulative environmental impacts should be assessed.

A number of submissions express concern that development of the plan area will result in biodiversity loss, habitat fragmentation, disturbance to species, ecological corridors and connectivity as well as environmental pollution, arising from development including traffic and transport infrastructure and construction. In this regard, a number of submissions request more robust provisions in the Draft Plan for the protection and enhancement of biodiversity, supported by environmental impact assessment and mitigation and biodiversity net gain measures, to ensure that ecological assets and networks are safeguarded and enhanced in the plan area. Some submissions contend that proposed biodiversity enhancement proposals in the proposed Regional Park do not off-set biodiversity losses in key development areas.

A number of submissions also request additional biodiversity and amenity proposals within the plan area with an emphasis on the Dunsink East development area, continuous biodiversity corridors linked to the wider green infrastructure network as well as minimum protective setbacks along the River Tolka, Scribblestown Stream and Royal Canal and a low impact lighting approach to protect nocturnal species and the preservation of views. One submission requests that required minimum setbacks for Scribblestown Stream as set out in the plan are shown on the Draft Plan maps, given the proposed scale of adjoining development. Some submissions require implementation of robust mitigation measures relating to Scribblestown Stream and the Tolka Valley to

reduce potential impacts. One submission requests a Royal Canal frontage and access strategy.

Submissions also request the preparation of detailed multi-seasonal ecological surveys, a biodiversity conservation management plan including biodiversity mapping, including tree canopy targets, designation of special conservation protection areas within the eastern, southern and western development areas, retention of the lands as a green lung, sensitive lighting strategies to protect nocturnal species, seasonal restrictions to protect nesting birds during construction, appropriate transitioning between development and ecological assets, ecological connections to outside the plan area, compliance with the All-Ireland Pollinator Plan, rewilding in parklands and confirmation that strategic public transport of the LUAS will not encroach on the Tolka Valley, all prior to the finalisation of the plan.

Chief Executive's Response

The Draft Plan has been prepared having regard to the relevant European, national and local legislative and policy framework relating to biodiversity, nature conservation and green infrastructure, including the EU Habitats Directive, Birds Directive, Wildlife Acts, Wildlife (Amendment) Act 2023, Ireland's National Biodiversity Action Plan 2023-2030, the Fingal Development Plan 2023-2029, the Fingal Biodiversity Plan and the objectives of the Nature Restoration Regulation (EU) 2024/1991 as well as the relevant government guidelines including the 'Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities'. It is noted that the public consultation period for the initial draft National Nature Restoration Plan (NRP) ended on 1st July 2026. The final Plan has yet to be published. The State will submit its initial draft NRP to the European Commission by 1st September 2026.

In accordance with these policy provisions, the Green Infrastructure Strategy set out in Chapter 7 of the Draft Plan ensures that growth is directed towards appropriate locations while safeguarding green infrastructure networks and environmental assets.

The Green Infrastructure Strategy underpins the spatial layout of the plan by adopting a landscape-led approach that recognises the intrinsic value of the area's natural assets and their role in shaping the sustainable growth of the plan area, ensuring that future development is planned in a manner that maintains ecological connectivity, enhances biodiversity and strengthens climate resilience. This landscape-led approach supports compact growth by integrating development with existing natural systems, protecting environmental quality, enhancing place-making and contributing to the creation of healthy, resilient and sustainable communities. The Heritage Council's submission which reinforces this landscape led approach is acknowledged and welcomed. A comprehensive

suite of specific objectives to protect, enhance and integrate biodiversity, ecological networks and green infrastructure as part of the future development of the area supports the Green Infrastructure Strategy.

Specifically, the Green Infrastructure Strategy is explicit in acknowledging the key ecological assets such as the River Tolka Valley, the Royal Canal, Scribblestown Stream and the associated green infrastructure assets, including mature trees, hedgerows, historic townland boundaries as well as the historic country houses and their associated landscapes in the plan area.

The Draft Plan promotes habitat protection, ecological connectivity and biodiversity enhancement across the Plan area through the protection and enhancement of the key ecological and biodiversity assets and associated ecological corridors together with the provision of strategic and local parklands and green linkages, nature-based solutions, sustainable drainage systems, the promotion of measures to prevent pollutants to enter watercourses during construction and operational phases through objective SIEF06, a low impact lighting approach to protect nocturnal species and the promotion of pollinator-friendly planting. These measures contribute to the conservation and enhancement of biodiversity and supports the delivery of a resilient, interconnected green infrastructure network which supports the objectives of both the National Biodiversity Action Plan and the Fingal Biodiversity Plan.

Specifically, the Green Infrastructure Strategy provides for a hierarchy of interconnected open spaces, including two strategic parks, the proposed Regional Park and Recreational Hub and the Tolka Valley Regional Park. These strategic open spaces together with an integrated network of green linkages seek to protect and enhance the River Tolka, the Royal Canal and Scribblestown Stream while strengthening ecological connectivity across the Plan area, linking these important ecological assets to the wider green infrastructure network.

Objective GI05 of the Draft Plan states that *'Development proposals shall seek to contribute to measurable biodiversity net gain, through habitat creation, ecological enhancement, and species support in line with national, regional, and local planning policy.'*

The proposed Regional Park and Recreational Hub will facilitate the restoration of the former landfill as multifunctional green space, delivering biodiversity enhancement, ecological connectivity, climate resilience and recreational benefits.

Objective GI10 seeks of the Draft Plan seeks to, *'Support the development of a Regional Park and Recreational Hub for passive and active recreational uses, incorporating biodiversity*

restoration and enhancement measures, habitat creation and green linkages at the former Dunsink landfill.

It is acknowledged that ongoing management and maintenance are essential to ensuring the long-term sustainability and ecological value of the strategic Regional Park at the former landfill. The lands are under the control of Fingal County Council which will provide for their long-term management and maintenance through the proposed Recreational Plan for the area. Having regard to the Heritage Council's recommendation, objective GI10 is proposed for amendment to support the long-term management and maintenance of the proposed Regional Park, to ensure its continued ecological, recreational and environmental value.

The River Tolka and its associated corridor are retained as part of the proposed Tolka Valley Regional Park where they will be protected and enhanced for biodiversity, flood management, landscape character and ecological connectivity, while accommodating only low intensity recreational and amenity uses that are compatible with the environmental sensitivities of the area. The River Tolka is afforded additional protection through the adjoining high amenity zoned lands which provides a landscape buffer and safeguards its ecological and riparian functions and landscape character as well as maintaining the integrity of this key biodiversity corridor.

The Plan also contains objectives to protect and enhance the Royal Canal and Scribblestown Stream as significant ecological and landscape features, recognising their role in supporting biodiversity, ecological connectivity and climate resilience.

The Draft Plan at section 7.4 is explicit in recognising the Royal Canal as a proposed Natural Heritage Area and acknowledges its ecological importance. The protection of the Royal Canal is further reinforced by its integration into the proposed Tolka Valley Regional Park and wider green infrastructure network, ensuring that any future development is carefully managed to avoid any adverse impacts on its biodiversity, landscape and cultural value. This approach provides a more comprehensive landscape strategy with the Royal Canal functioning as an integral element of the park rather than as a separate frontage. Access and accessibility will be addressed through the proposed Tolka Valley Regional Park approach. Section 3.12 of this report recommends a new objective within Chapter 12 (Urban Design Framework) to ensure the protection and enhancement of the Royal Canal where a sensitive design approach is required for any adjoining development.

The Draft Plan includes provisions for appropriate minimum setbacks and transitional design requirements from key ecological assets, including the River Tolka, the Royal Canal

and Scribblestown Stream to protect their ecological, riparian and landscape functions and ensure an appropriate transition between sensitive habitats and new development. Scribblestown Stream is integrated into proposed parkland as a key component of the green infrastructure network, enhancing biodiversity, ecological connectivity and amenity value. In addition, objective UDF19 specifically requires a minimum 10 metre riparian buffer from the top of the bank either side of the Scribblestown Stream. Development proposals will be required to adhere to the minimum set back requirements, ensuring appropriate separation from the stream corridor and safeguarding the integrity of the green infrastructure network and objective UDF19 is considered sufficiently robust in this regard.

A tree and hedgerow survey was undertaken to inform the preparation of the Draft Plan and informed the green infrastructure strategy and spatial framework as set out in the Draft Plan. The survey identified mature trees of higher ecological and landscape value predominantly located within the Tolka River valley, along the Royal Canal, Dunsink Observatory and Cappagh Hospital lands and within historic landscapes associated with the existing historic country houses. The Draft Plan acknowledges the contribution of these trees to biodiversity, landscape character and visual amenity as part of a connected green infrastructure network.

These identified trees are protected through their integration within the proposed Tolka Valley Regional Park which supports their retention and long-term management.

Similarly, the mature trees associated with Dunsink Observatory will contribute to the character and setting of the proposed Cultural Quarter, reinforcing the historic and landscape significance of the area. The spatial framework for the lands demonstrates the integration of trees associated with the historic country houses, ensuring that these established landscape assets continue to inform the identity and structure of future development. In addition, the existing mature trees within the vicinity of Cappagh Hospital will contribute to the amenity, landscape quality and the creation of an attractive community focused environment. Younger tree planting is evident across much of the golf course lands. Hedgerows were primarily identified along the River Tolka and within the eastern and central sections of the plan lands.

The tree survey carried out as part of this Draft Plan can inform consideration of future Tree Preservation Orders for the lands where appropriate, through the separate statutory process for making of such orders. Having regard to the green infrastructure strategy, spatial framework of the Draft Plan including robust tree protection objectives set out in both the Fingal Development Plan and the Draft Plan, it is considered that the

matter of Tree Preservation Orders can be kept under review and that no order is required at this time.

Chapter 7 of the Draft Plan contains specific objectives to retain and protect existing trees and hedgerows within the plan area where appropriate. Chapter 8 of the Plan seeks to protect and enhance historic townland boundaries, recognising their contribution to biodiversity, landscape character, ecological connectivity and local heritage.

The Draft Plan also includes a range of provisions to safeguard ecological networks. These include objectives promoting a low-lighting approach across the entire plan lands, including within the Tolka Valley to minimise disturbance to bats and other nocturnal species, the provision of mammal movement corridors to maintain and enhance ecological connectivity as well as design and buffer requirements to ensure an appropriate transition between new development and sensitive ecological assets, with particular emphasis on protecting the ecological and landscape character of the River Tolka, the Scribblestown Stream and the Royal Canal. Section 2.2 of this report details a number of recommendations for amendments in respect of external lighting in the context of the Department of Housing, Local Government and Heritage submission, to ensure the protection of natural and key built heritage assets within the plan area, from potential adverse impacts arising from inappropriate or excessive lighting.

The Draft Plan at objective GI07 seeks to ensure new public parks, streetscapes, and amenity areas, are designed to support diverse flora and fauna through native planting, varied habitat structures, and pollinator-friendly species which aligns with the principles of the All-Ireland Pollinator Plan and complements the biodiversity objectives of the Fingal Development Plan by promoting the use of native planting, habitat creation and ecological enhancement measures throughout the plan area.

Objective GI02 seeks to protect the elevated topography and major ridgelines in the northern part of the residential zoned lands, ensuring that the transformation of the former landfill into a regional park preserves and enhances panoramic views across the wider landscape. Key landscape views for protection along the River Tolka are shown on Figure 4.2 of the Draft Plan.

The Draft Dunsink Urban Area Plan is accompanied by a Strategic Environmental Report and a Natura Impact Report prepared in accordance with the relevant European and National environmental legislation. These assessments informed the preparation of the Draft Plan by identifying any potential environmental effects of implementing the Plan including any measures to avoid, reduce and mitigate any adverse impacts on the environment, including biodiversity, habitats and ecological networks.

The Chief Executive acknowledges the value of habitat mapping in supporting the identification and protection of ecological assets and acknowledges the Heritage Councils advice regarding the benefit of habitat mapping based on their guidance. The Environmental Report was informed by an ecological assessment and mapping of habitats and species within the plan area and the wider area. The findings of this assessment have informed the Draft Plan's environmental objectives and measures for the protection and enhancement of biodiversity.

The Draft Plan at Section 7.9 requires that all future development proposals are informed by detailed ecological assessment and comply with all relevant environmental legislation. Detailed ecological surveys, species specific mitigation, biodiversity enhancement measures, biodiversity net gain and construction management including pollution controls will be considered as part of the Development Management Process and any associated environmental assessments.

Objective GI31 of the Draft Plan states that 'Planning applications must be supported by comprehensive ecological surveys and assessments to protect local species such as badgers, otters, bats, and native bird species.'

Any future development proposals in the vicinity of Scribblestown Lane and Dunsinea Lane will be required to have regard to their ecological, landscape and historical value and associated protection objectives in the Fingal Development Plan and Draft Plan including the requirement for the ecological surveys and assessment reference above and environmental impact assessment as required, to ensure that development is sensitively designed and appropriately integrated with existing environmental assets through the development management process. This process provides a formal statutory opportunity for public participation that enables members of the public and interested parties to raise relevant planning and environmental matters for consideration by the Planning Authority.

In response to the request to identify specific lands as special areas of conservation, it should be noted that the lands in question are zoned for development in accordance with the zoning provisions of the Fingal Development Plan 2023-2029 and the planned growth strategy for the area. The Draft Plan seeks to balance the provision of planned development with the protection and enhancement of biodiversity and natural heritage assets through a robust Green Infrastructure Strategy that seeks the protection, enhancement and integration of biodiversity, ecological assets and green infrastructure and ecological connectivity, while facilitating the sustainable development of the plan area.

In relation to the proposed Luas corridor and potential for impacts on the Tolka Valley, it is noted that the route shown further to the north of the Tolka Valley as set out in the Draft Plan is indicative only. It is noted that any future Luas proposal will be subject to a separate statutory consent process which will include the preparation of detailed design and specific route alignment, will be accompanied by required environmental assessments, including the consideration of potential impacts on the biodiversity, ecological connectivity and corridors and include statutory public consultation stages to ensure that matters including biodiversity, landscape and environmental considerations are fully assessed.

The Draft Plan provides an appropriate and balanced framework for accommodating planned growth while protecting and enhancing the area's natural heritage assets and green infrastructure.

Chief Executive's Recommendation

Amend Objective GI10 at page 54 as follows:

'Support the development of a Regional Park and Recreational Hub for passive and active recreational uses, incorporating biodiversity restoration and enhancement measures, habitat creation and green linkages at the former Dunsink landfill, **and provide for its long-term management and maintenance to ensure its continued ecological, recreational and environmental value.**

Recreation and Open Space

Summary of Submissions

A number of submissions highlight that the Draft Plan presents a significant opportunity to identify and facilitate the delivery of a range of high-quality sports and recreational facilities for existing and new communities in the area, that will promote health, wellbeing, social inclusion, community interaction and prevent anti-social behaviour.

A number of submissions support the development of the former landfill as a Regional Park and Recreational Hub, noting that the new park will serve as a model for environmental regeneration but is dependent on a plan led and a co-ordinated long term management approach to ensure long term sustainability and such a plan is required prior to development.

It is emphasised that the planning and development of such facilities should be undertaken in consultation with the relevant sporting organisations to ensure that future provision is appropriately located, designed and aligned with community needs and delivered in the early phases of development. The potential amenity value of Ashton House is highlighted.

Submissions request the provision of a variety of sporting and recreational facilities including full-size playing pitches for soccer and GAA, all-weather pitches, running/walking tracks, MUGA's, handball alley, tennis courts, gym equipment, walking and cycling trails including BMX trails, playgrounds, changing facilities, an indoor training facility, youth facilities, scout den, as well as dedicated equestrian facilities to accommodate the established cultural activity of equestrianism and green open spaces all to serve existing and new communities in the area.

A number of submissions highlight the current shortfall in the provision of sports and recreational amenities in the area with specific reference to communities beyond the plan area within Dublin City Council's administrative areas including such areas as Finglas.

Submissions from sporting clubs within and adjoining the plan area highlight that existing club facilities are operating at or near capacity and there is a growing need for additional sporting infrastructure to support current and future demand, including the need for full size soccer and GAA pitches and supporting ancillary facilities. The findings of the Fingal Sports and Recreational Audit are documented in support of the provision of new sporting infrastructure requirements. Submissions highlight the potential for the plan area to address these sporting needs.

A number of submissions request a sporting infrastructure strategy detailing the number and type of pitches and changing facilities that can be accommodated within the proposed Regional Park and Recreational Hub and based on the Council's Sports and Recreation Facilities Audit. A minimum number of playing pitches and changing rooms to be delivered in phase one of development is requested. Engagement with existing sporting clubs in the wider area relating to the design of the recreational hub and access for existing clubs is also requested. Engagement with the DCC Dublin Northwest Sports Forum is also requested to ensure coordination between cross border clubs and the relevant stakeholders.

Submissions highlight the need for recreational facilities that are fully accessible to all ages and abilities.

A number of submissions express concerns regarding the loss of the Tolka Valley Park for recreation and well-being purposes and emphasise the impacts of proposed road schemes in the area on the recreational resource of the Tolka Valley including implications for accessibility to the parkland.

A number of submissions express concerns regarding the potential implications for the continued operations of the Elmgreen Golf Club arising from the development of the plan

lands. Submissions highlight the vital recreational amenity, well-being and social role that the existing golf club plays for its members and the wider community and questions the need for development of these lands. Submissions acknowledge the need for additional housing in the area but highlight that a balance is required between the need for development and retention of this long-established recreational amenity that supports health, wellbeing, and social cohesion. Submissions highlight the importance of engagement with the Golf Club and its representatives to assist in appropriately balancing the objectives of the Draft Plan with the operation and future needs of the golf club, including identifying a solution towards an alternative location for the golf club.

A number of submissions raise concerns regarding the future of existing horse and pony related activities within the plan area which is part of the local identity and the social and cultural infrastructure of the area, supporting community participation, inclusion and well-being. In this regard, a number of submissions request a permanent solution for their continued operations.

Some submissions contend that the proposed provision of public open space asset out in the Draft Plan is in excess of Development Plan requirements, particularly in the context of high-quality open space and recreational provision in the wider area, such as the National Sports Campus and Phoenix Park which has implications for the amount of land available for development, resulting in greater density of development.

A number of submissions object to the in-lieu provision relating to public open space as set out in the Draft Plan and consider that the inclusion of such a provision is not in keeping with policy and objective 5.1 of the Sustainable Residential and Compact Settlements Guidelines 2024. It is stated that the quantum of zoned open space provided within the Draft Plan should contribute towards the full provision of public open space for the residential zoned lands. It is submitted that this approach is supported by Policy and Objective 5.1 of the guidelines relating to public open space provision. A submission requests public open space capacity testing relative to population. A submission requests a review of the public open space calculation by distinguishing between the land affected by its former land fill use and land that is currently suitable and available for public amenity use against the 2.5 hectares of public open space per 1000 population standard.

A number of submissions also express concerns regarding the loss of open space lands of Scribblestown Park in the context of future development in the area and particularly future LUAS provision.

Chief Executive's Response

The Draft Plan establishes a clear hierarchy of parks and open spaces that will facilitate the delivery of a broad range of passive and active recreational opportunities including sports facilities and playing pitches as development progresses.

This hierarchy of open space is intended to ensure that recreational provision is distributed across the plan area, ranging from strategic destination regional parks serving the wider metropolitan area to neighbourhood and local parks that meet the day-to-day needs of residents and contribute to healthy, inclusive and active communities. Importantly, these parklands are designed to function as an interconnected green infrastructure network, linked by a comprehensive system of walking, cycling and active travel corridors thereby improving accessibility, encouraging sustainable travel and enhancing connectivity between neighbourhoods, recreational amenities and the wider metropolitan greenway network.

At strategic level, the Plan provides for the delivery of a Regional Park and Recreational Hub on the former landfill lands with the delivery of the first phases of the park to be delivered in phase one of the development of the plan lands. This park will accommodate a broad range of active and passive recreational uses for new and existing communities. The detailed nature and extent of these facilities will be informed by a Recreational Plan in accordance with the Draft Plan provisions which will establish the appropriate mix of sporting, recreational and complementary uses and long-term management. This Recreational Plan will be subject to a separate process where relevant stakeholders including local communities will be given the opportunity to engage with the Recreational Plan to ensure that their views and priorities are considered.

It is acknowledged that ongoing management and maintenance are essential to ensuring the long-term sustainability and ecological value of the strategic Regional Park. The lands are under the control of Fingal County Council which will provide for their long-term management and maintenance through the proposed Recreational Plan for the area.

The Council acknowledges the importance of providing a comprehensive network of recreational and open space facilities to support the needs of existing and future communities. The important role played by local sporting clubs in supporting community well-being, participation and social inclusion is acknowledged and the need for additional sporting and recreational facilities is noted, particularly where existing facilities are experiencing increased demand.

The concerns raised regarding the provision of sports and recreational facilities are acknowledged. Submissions highlight the need for additional sports infrastructure, including playing pitches, all-weather facilities, indoor leisure facilities and recreational

amenities, and emphasise the importance of ensuring that future provision serves both existing and future communities.

It is agreed that engagement with existing sporting organisations, including GAA, rugby and other sporting clubs, will be important in informing the future design and operation of recreational facilities. The requests for facilities catering to a range of age groups, including teenagers, older persons and youth organisations such as Scouts, are supported in principle and are consistent with the inclusive community objectives of the Plan.

The Draft Urban Area Plan provides an opportunity to support the provision of appropriately located community and recreational infrastructure as part of the future growth of the area.

The allocation of sports pitches within the Regional Park will be undertaken in accordance with Fingal County Council's adopted policies and procedures for the allocation and management of pitches, ensuring a transparent and equitable approach to the provision of sporting facilities in the area.

It is noted that the primary purpose of the Draft Plan is to establish an appropriate planning framework to meet the recreational needs generated by the planned development of the Dunsink plan area. The identification and delivery of recreational infrastructure within Dublin City Council's administrative area remains a matter for the relevant departments of Dublin City Council through land-use planning and their capital investment programme. Nevertheless, the proposed strategic parklands and recreational facilities within the plan area will provide benefits that extend beyond the Fingal administrative boundary and will be accessible to surrounding communities. The strategic scale of the proposed Regional Park and Recreational Hub and the Tolka Valley Regional Park and the interconnected active travel network will make a significant contribution to the wider metropolitan open space network and provide substantial recreational, health and well-being benefits for existing and future communities across both Local Authority areas.

The Draft Plan provides for the enhancement of the Tolka Valley Regional Park, recognising its important ecological, biodiversity and riparian functions. Accordingly, the emphasis within the Tolka Valley is on lower-intensity, nature-based recreation that is compatible with the protection and enhancement of this significant environmental asset.

The Draft Plan requires the delivery of neighbourhood and local parks in tandem with new development, ensuring that open space and recreational infrastructure is phased alongside population growth and integrated with the wider green infrastructure network.

The Draft Plan at Chapter 9 Inclusive Communities and Section 9.3 seeks to ensure that the built environment and community infrastructure including parks, opens spaces and recreational facilities are designed in accordance with the principles of universal design and inclusive placemaking, ensuring that they are accessible and capable of meeting the recreational, play and wellbeing needs of people of all ages and abilities, consistent with the objectives of the National Planning Framework, the Desing Manual for Urban Roads and Streets (DMURS) and the Building for Everyone, A Universal Design Approach guidance.

The important recreational role that Elmgreen Golf Club currently performs is acknowledged. Notwithstanding this, the lands occupied by the golf club under the ownership of Fingal County Council are zoned for residential purposes and form part of the zoned strategic landbank identified to accommodate the long-term planned growth of Dunsink, having regard to the National Planning Framework and the Regional Spatial and Economic Strategy, both of which identify the area as a strategic location for the planned expansion of the Dublin Metropolitan Area. The inclusion of the Elmgreen Golf Club lands within this strategic landbank is necessary to ensure the comprehensive planning of the area, facilitate integrated infrastructure delivery and respond to future housing, community and recreational needs over the lifetime of the Plan.

The Draft Dunsink Urban Area Plan provides a long-term framework for the phased development of this zoned development area. Having regard to the scale of the overall landbank, infrastructure requirements, sequencing of development and the need to deliver strategic transport, utilities, community facilities and open space, it is anticipated that lands currently occupied by the existing Elmgreen Golf Club would form part of the later phases of development. The value of continued engagement with Elmgreen Golf Club and its representatives in the long-term development of the plan lands is recognised. Continued collaboration with all relevant stakeholders will help to inform the detailed planning and future delivery of development proposals in balanced and constructive manner.

The long-standing association of horses with the area and the cultural, recreational and community importance of existing horse and pony related activities within the plan area is recognised. The relevant sections of the Council continue to engage with representatives of horse and pony activities in the area and other relevant stakeholders, to identify practical, sustainable and long-term solutions that seeks to balance the

delivery of strategic growth of the area with the continued support of the established community and cultural practices.

The proposed allocation of public open space has regard to the open space policy set out in the Sustainable Residential Development and Compact Settlements Guidelines (2024) (the 'Compact Settlements Guidelines'). In this regard, the lands at Dunsink fulfil the criteria for a strategic and sustainable development location referenced in the Compact Settlement Guidelines and the associated 'Development Plan Guidelines for Planning Authorities' (2022) and the minimum public open space basis is being determined in accordance with Policy and Objective 5.1 of the Compact Settlements Guidelines which states that "In the case of strategic and sustainable development sites, the minimum public open space requirement will be determined on a plan-led basis, having regard to the overall approach to public park provision within the area."

Section 7.5.5 of the Draft Plan acknowledges Dunsink's role as a sustainable and strategic development site and seeks to ensure that adequate public open space is provided as part of new residential development, while recognising, in certain circumstances, it may not be practical or appropriate for the full public open space requirement to be delivered on site.

It is noted that Section 5.1 of the Compact Settlements Guidelines does not advocate a single approach to the provision of public open space but rather allows for distinct areas of flexibility, having regard to the specific characteristics of individual sites and settlements. In such instances, a financial contribution in lieu of a portion of the public open space requirement may be considered where this will facilitate the delivery of high-quality public open spaces serving the wider community. Accordingly, the proposed approach is considered consistent with the flexibility provided for under Section 5.1 of the guidelines and allows for a balanced and context-sensitive approach to the provision of public open space.

It is considered appropriate to retain the former landfill lands within the planned public open space network as these lands have the potential to be regenerated as significant public park subject to appropriate remediation and environmental requirements. Their regeneration would provide a valuable public amenity. The allocation of public open space as set out in the Draft Plan is considered appropriate having regard to the specific context and characteristics of the plan lands. The provision of the proposed public open space provides an opportunity to deliver a high-quality and well-integrated green network supporting green infrastructure, biodiversity enhancement and climate resilience objectives. It also contributes to amenity, recreation and connectivity for existing and future residents. In this context, the level of public open space provision is considered to

represent a positive contribution to the overall plan area and to the achievement of broader environmental and place-making objectives.

Regarding concerns relating to the loss of open space lands associated with Scribblestown Park residential development, the lands are outside the Draft Dunsink Urban Area Plan boundary and within Dublin City Council's administrative area. The Luas route shown is indicative only and does not represent a defined or confirmed alignment. Any future Luas proposal will be subject to a separate statutory consent process which will include the preparation of detailed design and specific route alignment, will be accompanied by required environmental assessments, including the consideration of potential impacts on the biodiversity, ecological connectivity and open space and include statutory public consultation stages to ensure that matters including biodiversity, landscape and environmental considerations are fully assessed.

Chief Executive's Recommendation

No change.

3.8. Issues relating to Chapter 8 'Archaeological, Architectural and Cultural Heritage'

FIN-C973-6, FIN-C973-77, FIN-C973-114, FIN-C973-146, FIN-C973-166, FIN-C973-177, FIN-C973-186, FIN-C973-192, FIN-C973-193, FIN-C973-194, FIN-C973-203, FIN-C973-204, FIN-C973-205, FIN-C973-207, FIN-C973-216, FIN-C973-240, FIN-C973-289, FIN-C973-317, FIN-C973-319, FIN-C973-346, FIN-C973-348, FIN-C973-352, FIN-C973-362, FIN-C973-366, FIN-C973-368, FIN-C973-436, FIN-C973-475, FIN-C973-487, FIN-C973-491, FIN-C973-492, FIN-C973-504, FIN-C973-507, FIN-C973-515, FIN-C973-534, FIN-C973-551, FIN-C973-577, FIN-C973-612, FIN-C973-621, FIN-C973-627, FIN-C973-638, FIN-C973-645, FIN-C973-653, FIN-C973-665, FIN-C973-674, FIN-C973-682, FIN-C973-704, FIN-C973-712, FIN-C973-755, FIN-C973-780, FIN-C973-912, FIN-C973-924, FIN-C973-926, FIN-C973-1030, FIN-C973-1146, FIN-C973-1160.

Archaeological Heritage

Summary of Submissions

A number of submissions highlight the importance of early identification, assessment and protection of known and potential archaeological remains within the plan lands before development proceeds as well as the provision of protection buffers around known monuments and archaeological monitoring during construction. Particular concern is raised regarding two in-situ monuments, DU014-032-Earthwork and DU014-034-Burial Ground, that may be vulnerable to development with detailed comprehensive archaeological investigation and survey considered necessary to identify any potential subsurface structures and to avoid accidental damage during construction.

Specific concerns raised include historic tunnels near the ruins of an old castle to the rear of Valley Park, old bridges and possible archaeological interest of the Dunsinea Lane bridge and stone wall. It is requested that relevant features are checked against the Record of Monuments and Places and Sites and Monuments Record and that any unrecorded archaeological remains exposed during works be addressed through construction method statements and notification requirements

Chief Executive's Response

The policies set out in the Fingal Development Plan 2023-2029 (10.5.1 Archaeological Heritage) provide a comprehensive policy approach for archaeology in Fingal. The development management approach as detailed in the Fingal Development Plan including the requirement for detailed archaeological assessment, will ensure that development is designed and carried out in a manner that protects archaeological heritage and avoids adverse impacts on archaeological sites and their settings, and on objects or features of significant archaeological interest in the plan area.

These protection provisions are carried through to the Draft Plan, Chapter 8 includes a robust suite of objectives to protect and enhance both known and previously unidentified archaeological sites, recognising their importance as a non-renewable cultural resource and their contribution to understanding and preserving the area's heritage. Objectives AACH01, AACH02, AACH03, AACH04, AACH05 and AACH06 refers in this regard.

The Draft Plan seeks to protect archaeological monuments DU014-032-Earthwork and DU014-034-Burial Ground, by promoting their retention in situ within proposed parkland areas where they can make a positive contribution to the green infrastructure network by acting as focal points within the landscape. Their integration into this network will also enhance their cultural heritage value and support their long-term preservation through integration into future development of the area.

The Record of Monuments and Places / Sites and Monuments Record for the entire subject area were examined as part of the Plan preparation process. The Recorded Monuments/SMRs for the Plan area are listed on p.63 of the Draft Plan alongside those identified in the Record of Protected Structures and Other Architectural Heritage Sites. Objective AACH01 of the Draft Plan provides for the protection of all Recorded Monuments and all newly discovered sites and features of archaeological and historic interest and seek their preservation in situ (or at a minimum, preservation by record) through the planning process, having regard to the advice and recommendations of the National Monuments Service (NMS) of the Department of the Housing, Local Government and Heritage (DHLGH) and the Planning Authority.

Chief Executive's Recommendation

No change.

Architectural Heritage

Summary of Submissions

The submission from the Heritage Council as a Prescribed Body welcomes the heritage led approach to the plan making process. The submission notes that heritage is considered a primary placemaking tool and welcomes the compressive mapping of cultural and built heritage features on Map 8.1 of the Draft Plan together with comprehensive policies that deal with the main architectural and cultural heritage considerations in the plan area.

A heritage and adaptive reuse strategy is also proposed to identify historic buildings, landscape and views and industrial heritage to ensure that heritage assets remain legible, accessible, and integrated into new development. One submission promotes architectural design codes, extensive protection of pre-1950 and non-designated buildings and reconstruction and re-use of historic structures.

Submissions highlight the need to protect protected structures, non-designated heritage assets and their settings with particular attention to historic bridges, walls, water pumps, mill related features, historic tunnels and rural lanes. Submissions request surveys of built heritage along Scribblestown Lane, Dunsinea Lane and Dunsink Lane with particular emphasis on the Lady Forbes estate together with a list of features to be retained. Requests include formal assessment of Dunsinea Lane for possible inclusion on the Record of Protected Structures or NIAH together with the preservation of the bridge. Enforcement of protections and restricting relating to Longford Bridge is also requested. Concerns are also raised that the Draft Plan may omit or inaccurately describe architectural features including elements within the curtilage of Ashton House and Ashtown Mill, water pumps, the Ashtown Mill Race and the history and condition of the masonry bridge over the River Tolka. It also requested that references be checked and updated accordingly and listed for preservation on the Record of Protected Structures or alternatively referenced in the plan.

Chief Executive's Response

The Heritage Council's support for a heritage led approach is welcomed. The Draft Plan actively promotes this principle in line with the heritage led design approach promoted in the Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities.

The Draft Plan has been informed by a comprehensive assessment of the built heritage within the plan area, including the consideration of the significance, character and setting of identified heritage assets. As stated above, the Record of Monuments and Places / Sites and Monuments Record for the entire subject area were also examined as part of the plan process. The Recorded Monuments/SMRs for the Plan area are listed on p.63 of the Draft Plan alongside those identified in the Record of Protected Structures and Other Architectural Heritage Sites in Table 8.1 and Table 8.2.

The Draft Plan responds to the area's existing heritage features using these as a key influence in advancing the spatial layout of the plan to ensure that new development responds positively to the existing receiving environment and integrates successfully with existing heritage features, creating a distinctive, sustainable and well-integrated place for future residents.

The Fingal Development Plan 2023-2029 contains robust policy and objectives for the protection and enhancement of the County's built heritage. Specifically, the policy and objectives set out in Section 10.5.2 Architectural Heritage and Section 14.19.3 Architectural Heritage of the Development Plan guide development management relating to architectural heritage, whether a site has a statutory protected status or is not currently covered by specific designation but positively contributes to the character of the place or the historic building stock of Fingal.

Chapter 8 of the Draft Dunsink Urban Area Plan seeks the protection and enhancement of built heritage features within the plan lands, including Protected Structures and other identified architectural heritage features and include a robust suite of objectives in this regard, including objectives AACH01-AACH20. This ensures continuity with the overarching Development Plan framework and provides an appropriate policy basis for the protection and enhancement of heritage assets within the plan lands as part of future development proposals.

The provisions and policies of the Fingal Development Plan together with the specific objectives and provisions incorporated in the Draft Plan are considered sufficiently robust to ensure the protection, conservation and enhancement of built heritage with the plan lands. These provisions provide an appropriate policy framework for the retention and sensitive adaptation of buildings of heritage value where feasible and appropriate. The retention, re-use and sensitive adaptation of built heritage stock is strongly supported by the Fingal Development Plan 2023-2029 including policy HCAP9, HCAP10 and HACAP22, to ensure heritage conservation and sustainable development.

Any future development proposals in the vicinity of Scribblestown Lane and Dunsinea Lane will be required to have regard to their ecological, landscape and historical value and associated protection objectives in the Fingal Development Plan and Draft Plan including the requirement for environmental, heritage and visual impact assessment as required, to ensure that development is sensitively designed and appropriately integrated with existing heritage assets through the development management process. This process provides a formal statutory opportunity for public participation that enables members of the public and interested parties to raise relevant planning and environmental matters for consideration by the Planning Authority.

Table 8.1 clearly outlines in the description for Ashton House that the protected status extends to the main house, entrance gates and piers, gate lodge, boundary walls, and outbuildings. It is recommended that Table 8.1 be amended to give clarity to the Ashtown Mill and Mill Race/Channel and to acknowledge the partial damage to Dunsinea Lane bridge due to flooding.

The Forbes Estate that is being referred to appears to be Scribblestown House. The coordinates provided are sited on the potential remains of the farmyard and walled garden of Scribblestown House. The historic house was located further south and was the home to Lady Eva Forbes in the late 19th century. The house was badly damaged by fire in the 1970s but it does appear from aerial images that some elements such as the historic planting, boundary walls and the walls of the walled garden potentially still survive as evidenced in Table 8.2 and shown in Figure 8.1 of the Draft Plan.

Objective HCAO32 of the Fingal Development Plan 2023-2029 states to 'Require that proposals for development within historic designed landscapes include a Designed Landscape Appraisal (including an ecological assessment) as part of the planning documentation to fully consider the potential impacts of the proposal. The appraisal should be carried out prior to the initial design of any development, in order that this evaluation to inform the design which must be sensitive to and respect the built heritage elements and green space values of the site.'

Objective AACH08 of the Draft Plan is 'To protect and enhance the existing historic building stock within the Plan area, ensuring its contribution to local character is preserved and strengthened and to support the adaptive re-use of historic buildings.'

Table 8.2 indicates it is a non-exhaustive list of other architectural heritage sites in the Plan Area. Where other surviving historic structures or historic street furniture elements are revealed through site surveys or visits, they will be noted by the Planning Authority for consideration in any future pre-planning discussions, reviews of the Record of

Protected Structures, or any themed heritage audits such as the Historic Street Elements Audit.

Any proposal to add a structure to the Record of Protected Structures is outside the scope of the of the Draft Plan process and is subject to a separate statutory process under Part 4 of the Planning and Development Act 2000, as amended (and in the forthcoming Part 10 of the Planning and Development Act 2024 as amended).

Chief Executive's Recommendation

Amend the wording in Table 8.1 at page 67 as follows:

Structure Name	RPS No.	NIAH Building & Garden Survey Number	Description
Ashtown Mill & Mill Race/Channel	0691	11362067	Early 19th century former linseed oil mill complex consisting of mill building and ancillary historic buildings. The route of the water channel/ mill race serving the mill and site of the mill pond may still survive. forms part of the mill complex. The site of the mill pond has been covered in by a parking area but elements may survive underneath.

Amend the wording in Table 8.2 at page 68 as follows

Structure Name	Description
Masonry Bridge, Dunsinea Lane	Double arched masonry bridge over the River Tolka. Partially damaged in the 1950s by flooding.

Key Architectural Sites - Dunsink Observatory

Summary of Submissions

A number of submissions are supportive of the Draft Plan's recognition of Dunsink Observatory as a key heritage, scientific and cultural asset of international, national and local significance in the Draft Plan. Support is expressed for the Draft Plan's objective to

promote the observatory as destination for complementary scientific, educational and cultural activities.

A number of submissions highlight the Protected Structure status of Dunsink Observatory and welcomed the inclusion of a landscape buffer as an important measure to protect the observatory and its setting, while enhancing its role as a public amenity and visitor destination. Policy HACAP18 of the Fingal Development Plan relating to the protection of designed landscape features, settings and views is cited in support of the protection of Dunsink Observatory.

A number of submissions highlight Dunsink Observatory's role within the multi-site UNESCO World Heritage nomination and emphasise the need for the Draft Plan to fully recognise and protect its Outstanding Universal Value (OUV) having regard to strategic World Heritage protection pillars. In this regard, submissions consider that the Draft Plan should contain robust strategic provisions to safeguard the observatory, its setting and attributes of OUV, together with robust land-use and development objectives to ensure that future development does not compromise the operations and integrity of the observatory or prejudice the potential UNESCO World Heritage nomination.

The Heritage Council, as Prescribed Body highlights that consideration of the OUV attributes should be embedded within the Spatial Strategy at Section 4.2.4, informing development parameters and especially the Cultural Quarter and adjoining development areas from the outset, rather than being addressed solely at the individual planning application stage. They welcome the text in the Draft Plan at Section 8.3.2.1 relating to the protection of the OUV of Dunsink Observatory including objectives AACH09, AACH12 and AACH13 and supporting text at Section 8.3.3.3. They recommended that Section 8.3.3.3 reflect the attributes of authenticity of the potential OUV in design considerations. This approach reflects the OPW-Heritage Sections position on the matter.

While generally supporting the regeneration and future development of the plan area, submissions identified a number of issues which require further consideration to ensure an appropriate balance is achieved between facilitating development and protecting heritage significance, the operational function and landscape setting of the observatory. Particular concerns were raised regarding the potential cumulative impacts arising from the scale, building height and massing of future development, visual intrusion into the historic landscape, the erosion of important views and sightlines to and from the observatory, impacts on architectural integrity and setting, the potential for increased lighting and light pollution to adversely affect both the scientific function of the observatory and the quality of the night sky and construction related impacts.

A number of submissions including those from the Prescribed Bodies of the Heritage Council and the Office of Public Works-Heritage Section recommend that building height parameters within the vicinity of the observatory be reviewed and clarified in context of proposed building height ranges. Submissions seek the provision of more robust and clearly defined building heights within the plan area to ensure that future development remains subordinate to the heritage asset and does not adversely affect key views or the wider cultural landscape. Some submissions recommended that building heights in the immediate proximity to the observatory shall not exceed 2 storeys. Supportive photo montages and cross sections are submitted in support of recommended revised heights. Some submissions request that the Draft Plan is amended to explicitly recognise the Observatory as a factor in determining the scale of development within the Dunsink West, Central and East Development Areas in Section 12.4.4 of the Draft Plan relating to the Cultural Quarter.

Submissions also recommend that existing views and strategic sightlines be protected through statutory protection with additional views/sightlines identified and safeguarded through robust plan objectives.

A number of submissions welcome the 79.6 datum approach to development in the central development area as set out in the Draft Plan, in order to provide certainty regarding future building heights and their relationship to the observatory. A number of submissions including the OPW-Heritage Section recommend the application of this datum beyond the central area where feasible.

The issue of lighting received considerable attention throughout the submissions which highlighted the importance of maintaining dark sky conditions to protect the continued operations of the observatory, supporting the UNESCO nomination and enabling ecological, cultural heritage and climate policy commitments. One submission questioned whether the proposed changes to lighting controls intended to protect the observatory's operation and setting is consistent with objective CSO32 of the Fingal Development Plan, which supports its designation as a UNESCO World Heritage site.

In this regard, submissions recommend that the Draft Plan include robust lighting provisions and design standards beyond public lighting and in the absence of local objectives 101 and 102 of the Fingal Development Plan, the retention of the existing stated sky quality metrics value of 19SQM together with detailed requirements relating to external lighting design, illumination levels and the inclusion of effective monitoring and compliance provisions relating to lighting in the Draft Plan.

Submissions also addressed the proposed landscape buffer surrounding the observatory. While there was broad support for the inclusion of a buffer and wider cultural park to protect the setting of the observatory, a number of submissions seek clarity regarding its purpose, status and extent. Some submissions considered that the proposed 250 metre buffer was overly restrictive and requested that this be reduced to 100 metres with associated landscaping and low-rise medium density housing within the vicinity of the observatory to avoid the unnecessary sterilisation of adjoining residential zoned lands to facilitate appropriate residential development. A number of European examples are submitted in support of a reduced landscaped buffer in proximity to the observatory.

Other submissions consider that the extent of the buffer should be informed and established in the Draft Plan by the requirements of the UNESCO nomination and should provide an effective level of protection for the OUV, setting and operational requirements of the observatory. In addition, supporting objectives are required in the Draft Plan.

A number of submissions including submissions from the OPW-Heritage Section and the Heritage Council recommended that the Draft Plan be informed by additional evidence-based assessments based on UNESCO precautionary principles, to demonstrate that proposed development can be accommodated without adverse effects on the observatory's status as a protected structure and as a component site of a proposed World Heritage property, in consultation with relevant heritage stakeholders. These include the preparation of a Heritage Impact Assessment, Landscape and Visual Impact Assessments. UNESCO Guidance for Heritage Impact Assessments has been submitted in support of this approach.

The Heritage Council, as a Prescribed Body acknowledges the benefit of carrying out a Heritage Impact Assessment at this stage of the plan making process, providing a comprehensive assessment to inform the plan making process from the outset, as opposed to individual development application stage. In this regard, the benefit of amending objective AACH12 is highlighted to make specific reference to the need for a Heritage Impact Assessment for proposals that may impact on the potential OUV as opposed to 'due regard' in the objective.

Some submissions note that Dunsink Observatory is in the ownership of the OPW which extends beyond the observatory lands. Concern is expressed regarding Fig.12.12 as set out in the Draft Plan which shows a proposal for an opening in the boundary wall of the observatory to facilitate access as part of a wider landscaped proposal. It is noted that this wall is associated with the Protected Structure of the observatory and may give rise to impacts on the cultural heritage and landscape character value of the observatory as well as ecological and biodiversity functions and security and operational issues. The

OPW highlights the importance of protecting access, boundaries and security for Dunsink Observatory.

Submissions also highlight the importance of protecting and enhancing the historic approach to Dunsink Observatory, particularly the Meridian Line and Hamilton Way. It is recommended that the Hamilton Way be preserved as a continuous, legible pedestrian route incorporating high-quality public realm, interpretation way finding and landscaping to reinforce its historic significance and strengthen connections between the observatory and the surrounding area.

Submissions further support measures to promote and interpret the observatory as an internationally significant heritage, scientific, educational and cultural destination through enhanced interpretation and visitor facilities, partnerships with educational institutions to promote science outreach and complimentary land uses that respect its heritage significance and operational requirements. One submission supports the development of a planetarium within the area to the west of Dunsink Observatory, subject to datum provisions and would be open to exploring partnership opportunities, where appropriate, with relevant key stakeholders to advance such a project.

Submissions highlight the need for continued engagement with Prescribed Bodies including the OPW-Heritage Section and the Heritage Council and key relevant stakeholders with Fingal County Council in the plan making process as essential to securing the long-term protection, enhancement and appropriate management of this internationally and nationally significant heritage asset.

Chief Executive's Response

The Draft Plan at Chapter 8 recognises Dunsink Observatory as a heritage asset of international, national and local significance and seeks to protect and enhance its scientific and cultural functions, while facilitating the sustainable development of the wider plan area.

The Draft Plan has been informed by extensive engagement with key stakeholders and the relevant sections of the Council to inform and advance a sustainable and balanced approach to the protection and enhancement of Dunsink Observatory and its setting, with specialist design input, to ensure that the approach is both heritage-led and responsive to the wider objective for the area, including placemaking, connectivity and high-quality design.

The Draft Plan establishes an appropriate framework to guide future development and to protect Dunsink Observatory, its setting and heritage significance. The Draft Plan

includes provisions to ensure that future development is compatible with the heritage significance and operational requirements of the observatory.

The potential for Dunsink Observatory to be advanced for UNESCO World Heritage nomination and the importance of explicitly recognising and safeguarding its OUV within the spatial strategy from the outset, rather than at assessment stage, as advocated by the Heritage Council and the OPW-Heritage Section is acknowledged.

The Draft Plan has been prepared having regard to the emerging nomination and provides an appropriate framework that safeguards the qualities and attributes which underpin the nomination bid. Specifically, Sections 8.3.2.1 and Sections 8.3.3 – 8.3.3.3 of the Draft Plan and objectives AACH09-AACH13 refers in this regard.

Objective AACH10 is to 'Support the designation of Dunsink Observatory as a UNESCO World Heritage Site'. Specifically, the Draft Plan recognises the importance of the observatory's heritage significance and OUV within the spatial strategy and provides a range of complementary measures to inform and control future development, including a landscape buffer, design and building height controls, the application of appropriate development management criteria including heritage and visual impact assessment, where required and the promotion of complementary uses

The proposed landscape buffer, which forms part of the wide Cultural Quarter, extends beyond Dunsink Observatory and its immediate setting to provide an appropriate transitional zone that can support and strengthen any future UNESCO World Heritage Nomination, particularly given that no defined UNESCO World Heritage boundary has been established at this time. Accordingly, Fingal County Council will continue to liaise with key relevant stakeholders and prescribed bodies as appropriate, as the nomination process progresses and further information regarding the extent and management of any potential UNESCO World Heritage boundary becomes available.

Fingal County Council will also keep the relevant Urban Area Plan and Development Plan provisions under review and will consider whether a future review or amendment is necessary should the World Heritage nomination progress, a buffer zone be formally defined or new management requirements emerge. This will ensure that the planning policy framework remains responsive to the evolving designation process and continues to provide appropriate protection for the sites heritage significance while allowing for sustainable and appropriately managed development.

Any future development proposals will be required to demonstrate that they do not adversely affect the heritage significance, setting or attributes of the OUV of the

observatory where applicable, in accordance with relevant plan provisions and specifically requirements set out under objectives AACH09-AACH13.

As referenced above, the proposed landscape buffer has been identified having regard to the heritage significance of Dunsink Observatory, its setting and the need to provide an appropriate transition between the existing heritage asset and future development. The extent of the buffer has been carefully considered and is deemed appropriate to protect the setting and visual prominence of the Observatory, while also allowing for a meaningful and integrated relationship with the emerging development.

The proposed landscape buffer forms an integral part of the proposed Cultural Quarter and is intended to function as more than solely a transition zone. Incorporating parklands, landscaped areas and other complementary cultural and recreational uses will provide a high quality-transition between the Observatory and new development, enhancing the setting of the heritage asset while creating an attractive and accessible public realm. This approach seeks to balance the protection of the Observatory's significance with the delivery of a coherent, connected and vibrant Cultural Quarter.

The proposed landscaped buffer is considered necessary and proportionate to ensure that development does not unduly encroach upon or diminish the character, setting or appreciation of the observatory and integration into the wider parkland and cultural landscape ensures that these lands contribute to placemaking, biodiversity, amenity and the overall identity of the proposed Cultural Quarter. Figure 12.12 of the Draft Plan illustrates an indicative approach to the proposed Cultural Quarter incorporating the proposed landscape buffer and integrating parklands and other complimentary uses.

The concerns raised regarding the scale, massing and building heights of the proposed development in relation to Dunsink Observatory are acknowledged and in particular the submissions from the Heritage Council and OPW-Heritage Section seeking a review of building height provisions to ensure that new development remains subordinate to the observatory and not adversely impact on key views or the wider cultural landscape. The Draft Plan includes specific building height controls in areas where development has the potential to affect the Observatory and its setting together with measures to protect identified key views to ensure that the scale and form of development are appropriately considered in relation to the observatory.

The proposed plan provisions together with recommended measures provides a robust framework to manage the scale, massing and height of future development, protect the visual prominence and setting of the observatory and avoid adverse impacts on key views and the wider cultural landscape.

It is considered that the 79.6 metre OD provision provides a clear height parameter within the central development area where building height has the greater potential to affect the setting and visual relationship of the observatory, preventing development from rising above an established datum and providing greater certainty in assessing the scale and massing of any relevant development proposals, thereby ensuring that the observatory's visual prominence, its relationship with the surrounding landscape and important views to and from the observatory are maintained. In combination with the Draft Plan's heritage protection objectives, landscape buffer, context sensitive design approach, the protection of key views as set out in Fig. 8.8, lighting controls and heritage and visual impact assessment requirements for development proposals relative to the observatory, the extent of this control is considered sufficient to safeguard the observatory and its setting.

Section 12.5 of the Draft Plan provides details in respect of lighting within the Plan area which promotes a low impact light approach, particularly having regard to the Dunsink Observatory. The provisions of the Draft Plan have been further examined and it is considered appropriate to amend these to clarify that the lighting provisions relate to all forms of external lighting and to include additional provisions in relation to potential impacts on the Observatory. In this regard, the Chief Executive makes a number of enhanced lighting recommendations in the context of the submission by the Department of Housing, Local Government and Heritage and supports a sensitive and co-ordinated approach to lighting within the area.

It is considered appropriate that a detailed Heritage and Visual Impact Assessment is undertaken at development application stage when the specific nature, scale, form, massing and landscaping and other characteristics of the proposed development are known and allows any potential impacts on the observatory and its setting to be assessed accurately and comprehensively.

Objective AACH12 of the Draft Plan seeks to ensure that regard is taken of the World Heritage Resource Manual 'Managing World Heritage' (2026, UNESCO, ICCROM, ICOMOS and IUCN), 'Guidance and Toolkit for Impact Assessments in a World Heritage Context' (UNESCO, ICCROM, ICOMOS and IUCN) and the 'Strategy for World Heritage in Ireland 2025-2035' (Government of Ireland) in the design and the assessment of any development proposals that affect Dunsink Observatory or its setting.

Specifically, objective AACH13 of the Draft Plan states that 'Development proposals where relevant, shall incorporate the required landscape setback, high quality and context-sensitive design, appropriately scaled building heights and carefully designed low impact lighting and the protection of key views, informed by an Architectural Heritage Impact

Assessment and Visual Impact Assessment, to be undertaken by suitably qualified professionals, in order to protect the scientific and cultural significance of Dunsink Observatory'.

This objective provides support for the Planning Authority to require the carrying out of Architectural Heritage Impact and Visual Impact Assessments to be carried out where there is a concern that a proposal may impact on the scientific and cultural significance of Dunsink Observatory.

It is proposed to amend objective AACH13 as set out above to include a requirement for 3D modelling information to support the assessment of development proposals in relation to Dunsink Observatory, providing a spatial and three-dimensional evidence base of how development would relate to the observatory and its wider setting, complementing the required Heritage and Visual Impact Assessments.

The Draft Plan integrates the Hamilton Way and Meridian Line through a legible high-quality public realm, strengthening connections between the Observatory and the wider plan area. This will improve accessibility and connectivity while reinforcing the Observatory as a focal point and enhancing its setting and relationship with the proposed Cultural Quarter. Figure 12.12 within the Draft Plan provides an indicative illustration of this approach.

The Chief Executive acknowledges that Dunsink Observatory is privately owned and acknowledges the concerns raised in relation to the proposals illustrated in Figure 12.12. Figure 12.12 is an indicative conceptual illustration only and depicts an overall approach to the proposed Cultural Quarter. The illustration seeks to illustrate the legibility of the Meridian Way, a component of the cultural heritage of the area, strengthen connections in the area and improve the relationship between the Observatory and the wider Cultural Quarter and Plan area. It is acknowledged that the lands are in private ownership and that the decision to facilitate the opening up of these lands to wider access is entirely within the remit of the landowner. To address concerns, it is recommended that Figure 12.12 be amended to remove an indication of an opening in the boundary wall of the Dunsink Observatory property.

The Planning Authority welcomes support for the further promotion of Dunsink Observatory as a focus for complementary cultural and educational uses, including through partnerships with relevant stakeholders, to explore and advance appropriate opportunities that enhance public engagement, interpretation and appreciation of the observatory's heritage and scientific significance, while supporting its long-term protection and conservation.

The Planning Authority will continue to liaise with key relevant stakeholders and prescribed bodies as appropriate, on an ongoing basis in relation to the protection, conservation and enhancement of Dunsink Observatory and its setting, including in the context of the UNESCO World Heritage site bid, to ensure that the planning framework and emerging development proposals appropriately reflect the observatory's heritage significance and support the objectives of its potential designation and long-term conservation.

Chief Executive's Recommendation

Amend Figure 12.12 Dunsink Cultural Quarter Conceptual Image on Page 104 as follows:

Remove the space in boundary wall at the Meridian Wall to illustrate a closed boundary wall.

Amend objective AACH13 on page 72 as follows:

'Development proposals where relevant, shall incorporate the required landscape setback, high quality and context-sensitive design, appropriately scaled building heights and carefully designed low impact lighting and the protection of key views, informed by an Architectural Heritage Impact Assessment and Visual Impact Assessment, **including 3D modelling information**, to be undertaken by suitably qualified professionals, in order to protect the scientific and cultural significance of Dunsink Observatory'.

Historic Country Houses

Summary of Submissions

A number of submissions call for fuller recognition and assessment of historic houses, remains and associated landscapes. Specific reference is made to Scribblestown House and Avondale House in Ashtown where these properties represent important and irreplaceable heritage assets which may be vulnerable to development and result in the permanent loss of their unique historic character. Their local historical associations are cited as further justification for protection and integration into the plan area.

One submission notes that Scribblestown House is identified as a heritage property within the Draft Plan, however, it does not have formal Protected Structure status.

Chief Executive's Response

The Fingal Development Plan contains robust provisions for the protection of such heritage assets including section 10.5.2 Architectural Heritage and specifically section 10.5.2.4 relating to the protection of historic designed landscapes. These provisions provide an established policy framework for recognising and safeguarding the

architectural, historical and cultural significance of historic country houses and their associated landscapes.

The Development Plan and the Draft Plan contain robust provisions for the protection, conservation and enhancement of historic country houses and their associated settings. These provisions have informed the preparation of the Draft Plan's spatial framework which seeks to appropriately integrate identified historic country houses into the overall structure and character of the plan lands with the aim of safeguarding their heritage significance and maintaining their contribution to the character and identity of the area. This approach ensures that future development is sensitively integrated with the existing heritage resource while enabling the sustainable development of the lands.

While noting that Scribbletown House does not have formal Protected Structure status, the Draft Plan expressly recognises the architectural and cultural value of Scribbletown House including Avondale House as set out in Table 8.2 and provides an appropriate framework for ensuring that these heritage assets and their settings are considered in the design of future development.

Objective HCAO32 of the Fingal Development Plan 2023-2029 is to, *'Require that proposals for development within historic designed landscapes include a Designed Landscape Appraisal (including an ecological assessment) as part of the planning documentation to fully consider the potential impacts of the proposal. The appraisal should be carried out prior to the initial design of any development, in order that this evaluation to inform the design which must be sensitive to and respect the built heritage elements and green space values of the site.'*

Objective AACH08 of the Draft Plan is *'To protect and enhance the existing historic building stock within the Plan area, ensuring its contribution to local character is preserved and strengthened and to support the adaptive re-use of historic buildings.'*

Chief Executive's Recommendation

No change.

Cultural Heritage

Summary of Submissions

Some submissions seek Gaeilge amháin - Irish language only naming schemes to be applied to part or all of residential development within the plan area and others requesting naming to be reflective of local history and cultural features rather than generic naming.

Some submissions requests that local historical and cultural associations are integrated into the plan area.

Some submissions express concerns regarding the overall name of the planned area with some submissions considering 'Dunsink' incomplete or associated with the former landfill while others object to 'quarter' or 'city quarter'.

Some submissions request the preparation of a cultural framework to promote the distinct cultural identity of the plan area to include public art, performance spaces, interpretation of the areas cultural heritage and community led cultural events.

Chief Executive's Response

The request for residential development to be named in Irish is noted.

Objective HCAO63 of the Fingal Development Plan 2023-2029 states *'Ensure that the naming of mixed residential and mixed-use schemes reflect local history, folklore and/or place names and are stated in the Irish language.'*

The Draft Plan within Chapter 8 acknowledges the resurgence and continued use of the Irish language and supports its appropriate consideration in the plan area. The naming of residential developments will be addressed through the Development Management process in consultation with the Council's Heritage Officer, where appropriate, in accordance with relevant provisions of the Development Plan.

It is considered that local historical and cultural associations can be integrated into the plan area through place names or street naming.

A dedicated cultural framework is considered to fall outside the remit of the Plan. This matter would be more appropriately considered through the Council's arts and cultural functions and any relevant future initiatives.

While concerns regarding the naming of the plan are acknowledged, it is noted that public perception of the area can evolve through successful regeneration. Well designed placemaking can establish a new narrative around the name and ensure that future associations with the name are based on the quality, character and community of the area rather than its historic land use.

Chief Executive's Recommendation

No change.

Townland Names

Summary of Submissions

A number of submissions express concerns that existing townland identities could be subsumed within a general Dunsink designation. Particular concerns relate to the perceived classification of parts of Castleknock and the description of Dunsinea Lane as Dunsink rather than Scribblestown. Submissions request the retention and use of Castleknock, Scribblestown and other existing townland names.

Chief Executive's Response

In the interests of clarity, Section 8.4.2. of the Plan references Castleknock as a townland, parish and a barony. Section 8.4.3. details the significance of historic townland boundaries including those of Castleknock and Objective AACH17 seeks to avoid detrimental impacts on historic townland boundaries where possible.

Chief Executive's Recommendation

No change.

Traveller Culture

Summary of Submissions

A number of submissions welcome the recognition of the area's established Traveller culture in the plan area and associated heritage and community significance and identify the plan as an opportunity to improve Traveller specific accommodation and cultural recognition.

The submission from the Heritage Council as a Prescribed Body welcomes the provisions under Section 8.4.6 of the Draft Plan on Traveller culture which recognises the significant intangible and physical cultural contribution the community makes to the area.

A number of submissions seek delivery of Traveller culture and culturally appropriate accommodation through meaningful partnership with the community.

Chief Executive's Response

Submissions are welcomed and the importance of recognising Traveller culture and providing culturally appropriate accommodation is acknowledged. The Draft Plan recognises the contribution and importance of Traveller culture within the area at Chapter 8 and supports the creation of socially balanced, inclusive and sustainable communities. Chapter 9 Inclusive Communities seeks to ensure that the needs of all members of the community are appropriately considered in the planning and provision of services and accommodation. In addition, Chapter 12 Urban Design Framework specifically acknowledges the need for Traveller accommodation and responds to

identified needs in key development areas. The Draft Plan therefore supports the provision of Traveller accommodation as part of an inclusive approach to housing and community development. As stated earlier in this report, the Council's Housing Section continues to proactively advance the established Traveller Accommodation Programme through a collaborative approach.

Chief Executive's Recommendation

No change.

3.9. Issues relating to Chapter 9 'Inclusive Communities'

FIN-C973-2, FIN-C973-11, FIN-C973-12, FIN-C973-16, FIN-C973-20, FIN-C973-24, FIN-C973-26, FIN-C973-27, FIN-C973-30, FIN-C973-35, FIN-C973-37, FIN-C973-47, FIN-C973-48, FIN-C973-49, FIN-C973-50, FIN-C973-52, FIN-C973-55, FIN-C973-80, FIN-C973-81, FIN-C973-85, FIN-C973-88, FIN-C973-89, FIN-C973-90, FIN-C973-91, FIN-C973-102, FIN-C973-108, FIN-C973-110, FIN-C973-113, FIN-C973-127, FIN-C973-129, FIN-C973-141, FIN-C973-142, FIN-C973-143, FIN-C973-144, FIN-C973-146, FIN-C973-148, FIN-C973-155, FIN-C973-167, FIN-C973-168, FIN-C973-169, FIN-C973-170, FIN-C973-175, FIN-C973-182, FIN-C973-183, FIN-C973-210, FIN-C973-211, FIN-C973-212, FIN-C973-215, FIN-C973-216, FIN-C973-220, FIN-C973-221, FIN-C973-223, FIN-C973-226, FIN-C973-230, FIN-C973-233, FIN-C973-239, FIN-C973-241, FIN-C973-242, FIN-C973-244, FIN-C973-254, FIN-C973-255, FIN-C973-269, FIN-C973-272, FIN-C973-274, FIN-C973-278, FIN-C973-287, FIN-C973-319, FIN-C973-321, FIN-C973-331, FIN-C973-335, FIN-C973-339, FIN-C973-342, FIN-C973-352, FIN-C973-355, FIN-C973-360, FIN-C973-364, FIN-C973-367, FIN-C973-368, FIN-C973-373, FIN-C973-375, FIN-C973-377, FIN-C973-378, FIN-C973-385, FIN-C973-402, FIN-C973-409, FIN-C973-413, FIN-C973-453, FIN-C973-459, FIN-C973-464, FIN-C973-467, FIN-C973-469, FIN-C973-475, FIN-C973-480, FIN-C973-481, FIN-C973-488, FIN-C973-491, FIN-C973-493, FIN-C973-495, FIN-C973-503, FIN-C973-504, FIN-C973-509, FIN-C973-557, FIN-C973-567, FIN-C973-569, FIN-C973-584, FIN-C973-589, FIN-C973-591, FIN-C973-593, FIN-C973-612, FIN-C973-621, FIN-C973-623, FIN-C973-627, FIN-C973-633, FIN-C973-636, FIN-C973-645, FIN-C973-650, FIN-C973-653, FIN-C973-654, FIN-C973-655, FIN-C973-658, FIN-C973-661, FIN-C973-663, FIN-C973-668, FIN-C973-670, FIN-C973-673, FIN-C973-676, FIN-C973-680, FIN-C973-681, FIN-C973-682, FIN-C973-684, FIN-C973-685, FIN-C973-688, FIN-C973-695, FIN-C973-699, FIN-C973-700, FIN-C973-701, FIN-C973-704, FIN-C973-705, FIN-C973-713, FIN-C973-714, FIN-C973-717, FIN-C973-719, FIN-C973-722, FIN-C973-732, FIN-C973-751, FIN-C973-752, FIN-C973-753, FIN-C973-768, FIN-C973-783, FIN-C973-791, FIN-C973-794, FIN-C973-846, FIN-C973-898, FIN-C973-984, FIN-C973-996, FIN-C973-1003, FIN-C973-1018, FIN-C973-1051, FIN-C973-1077, FIN-C973-1097, FIN-C973-1111, FIN-C973-1122, FIN-C973-1123, FIN-C973-1146, FIN-C973-1157.

Community Infrastructure and Services

Summary of Submissions

A number of submissions emphasise the need for social, community and service infrastructure to be delivered in tandem with residential development. Submissions express concern that existing schools, healthcare services, community facilities, sports amenities and other public services in Finglas and surrounding areas are already under pressure and that further population growth could exacerbate existing capacity constraints. Many submissions request clear phasing arrangements, delivery triggers and infrastructure-led development, with some seeking the provision of key facilities, including schools, healthcare services and employment opportunities, in advance of or alongside residential occupation. Submissions also highlight the importance of ongoing coordination between local authorities, statutory agencies and service providers to ensure investment and infrastructure delivery aligns with population growth.

A number of submissions raise concerns regarding education provision within the Plan area. While welcoming the inclusion of school sites, submissions seek greater clarity regarding the number, capacity, phasing and delivery timelines for primary and post-primary schools. Concerns are raised regarding existing school capacity in the surrounding area and the potential for future demand to exceed current projections. Submissions request a clear strategy linking school delivery to residential development, together with provision for special educational needs facilities, including special classes and school accommodation. Some submissions also seek the identification of additional or specific sites for future post-primary education.

The submission from the Department of Education and Youth notes that the scale of future population growth will create significant demand for additional school places and may place pressure on existing educational facilities. It states that apart from the necessity of seeking site reservations for new schools, the Department's preference is to expand existing facilities (if possible) should there be a requirement for additional school places arising from planned population increases. They recommend that opportunities for the expansion of existing schools be considered, that sufficient flexibility is retained within school sites to facilitate future expansion where required, and that the Plan explicitly supports the delivery of special educational needs accommodation.

Several submissions highlight the importance of childcare provision and seek greater certainty regarding the number and delivery of childcare facilities. Concerns are raised regarding whether adequate childcare capacity will be provided during the early phases of development and whether childcare units will be designed in a manner that allows their long-term viability and occupation by childcare providers.

A number of submissions seek enhanced healthcare and community services, including GP, primary care, dental and mental health facilities, together with services and facilities for older persons and people with disabilities. Submissions also identify the need for adequate Garda, community policing, fire and emergency services to support future population growth and maintain community safety.

Numerous submissions support the provision of a broad range of community, cultural, recreational and commercial facilities to create a vibrant and self-sustaining community within Dunsink. Suggested facilities include community centres, libraries, cultural spaces, cafés, local shops, flexible commercial space, parks, playgrounds, allotments and walking and cycling routes. Submissions state that such facilities are important in fostering community identity, social inclusion, local employment opportunities and healthy lifestyles. Some submissions consider that Dunsink should develop as a distinct community with its own range of services rather than relying primarily on existing facilities in Finglas and surrounding areas.

A number of submissions highlight the importance of delivering a thriving and inclusive community supported by timely social infrastructure, accessible transport, local employment opportunities, meaningful community engagement and sustained investment in community development. A small number of submissions also request amendments to the community infrastructure assessment and the correction of identified errors in the classification of facilities within the Plan, and the omission of the horse and pony club.

Chief Executive's Response

The Chief Executive acknowledges the issues raised regarding the timely delivery of community infrastructure and services alongside residential development. Many submissions emphasise the importance of ensuring that social, educational, healthcare, recreational and community facilities are delivered in tandem with population growth rather than after residential occupation. This is also addressed in response to the issues raised relating to Chapter 13 in Section 3.13 of this report.

The Draft Plan adopts an infrastructure-led approach to development. Objective IC03 requires social and community infrastructure to be identified and delivered alongside population growth, while Objectives IC01 and IC02 support the provision of community, cultural, recreational and social facilities necessary to create sustainable communities. This approach is reinforced by the Fingal Development Plan 2023-2029. Objective DMS078 requires a Community and Social Infrastructure Audit to accompany large-scale residential and mixed-use developments. This audit will assess existing infrastructure provision, identify service deficits and determine any additional facilities required to

support proposed development. This requirement will apply to future planning applications within Dunsink and will help ensure infrastructure needs are assessed and addressed as development progresses.

The detailed sequencing of development is addressed in Chapter 13 (Phasing of Development) in the Draft UAP. The importance of ongoing inter-agency coordination is recognised and is considered important to the successful delivery of the Plan. The Council will continue to engage with key stakeholders including the Department of Education and Youth, the Health Service Executive, An Garda Síochána, Tusla and Dublin City Council to ensure that infrastructure needs are considered on a coordinated, cross-boundary basis.

The support expressed for the inclusion of educational facilities within the Draft Plan is welcomed. Concerns regarding existing school capacity and the future educational requirements of Dunsink are acknowledged. Section 9.3.2 identifies a requirement for approximately six primary schools and four post-primary schools and reserves ten school sites within the Plan area under Objective IC06. Provision is made for two school sites in the first phase of development in the Plan lands, with additional schools provided as population growth occurs.

The precise timing, capacity and type of schools required is a matter for the Department of Education and Youth and cannot be determined with certainty at Urban Area Plan stage, noting that the submission received from the Department of Education and Youth states that the Department's preference is to expand existing facilities (if possible) should there be a requirement for additional school places arising from planned population increases. This approach would affect the timing and requirement for new build schools. The importance of maintaining close engagement with the Department to ensure that educational provision is aligned with population growth is recognised and the Council will continue to engage with the Department in this respect to ensure the timely delivery of school places.

The recommendation from the Department of Education and Youth that opportunities for future school expansion be protected, where feasible, is considered reasonable and will be considered in future Development Plan processes in the county, noting that this would constitute a zoning issue which is outside of the scope of the Plan. The Department's request for the Plan to support special educational needs provision is recognised. The Plan will facilitate the delivery of special educational needs accommodation within reserved school sites where a need is identified by the relevant authorities. In addition, it is recommended that specific reference to special education needs is made in the Plan.

The request to identify specific sites for post-primary education, including lands adjacent to Coolmine Rugby Club, is noted. As noted above, provision has been made for 10 no. future school sites in the Draft Plan and this is considered sufficient. However, the provision and need for educational facilities will be kept under ongoing review in conjunction with the Department of Education and Youth.

Submissions seeking greater certainty regarding childcare provision are noted. The 'Childcare Facilities Guidelines for Planning Authorities' (2001) and 'Planning Design Standards for Apartments Guidelines for Planning Authorities' (2025) set out national policy in respect of childcare facilities. Section 9.3.1 and Objectives IC04 and IC05 of the Draft Plan require the provision of childcare facilities in accordance with national guidelines. Applications for residential development will therefore have to demonstrate how they are complying with these guidelines and how they will provide the requisite facilities. This provides a clear framework for the delivery of childcare facilities alongside residential development and is considered sufficient to ensure childcare capacity is provided from the early stages of development.

Concerns regarding the viability and operational requirements of childcare facilities are acknowledged and through the development management process applicants will be encouraged to take due account of these issues when developing proposals for childcare facilities.

The need for healthcare provision, including primary care, GP services, dental care, mental health services and facilities for older persons and people with disabilities, is recognised. While the delivery of healthcare services falls primarily within the remit of the Health Service Executive, the Plan identifies healthcare infrastructure as an important component of community infrastructure. The Council will continue to engage with the HSE regarding future healthcare requirements and will facilitate the delivery of healthcare facilities.

In relation to community safety, Section 9.3.4 of the Draft Plan acknowledges the potential requirement for additional Garda and fire service facilities to serve future population growth. The precise timing and delivery of these facilities is a matter for the relevant statutory agencies. However, the Council will continue to engage with these bodies to ensure service provision evolves in line with development.

Submissions supporting a broad range of community, cultural, recreational and commercial facilities are welcomed. The Plan seeks to create a sustainable and inclusive community through the provision of neighbourhood centres, community facilities, local services, public open space and recreational infrastructure.

The aspiration that Dunsink develops a distinct identity and functions as a self-sustaining urban area rather than relying solely on existing services in the wider area is consistent with the overall vision and objectives of the Plan.

The observations regarding the importance of community development, social inclusion, stakeholder engagement, local employment and timely infrastructure delivery are also welcomed and align with the objectives of the Draft Plan.

It is also noted that Table 9.2 contains a classification error whereby sports and recreation facilities and health and social services facilities have been transposed. This matter should be corrected. In addition, reference should be included to the St. Joseph's Horse & Pony Club in Table 9.1 and Figure 9.1 which was inadvertently omitted from the Draft Plan.

Chief Executive's Recommendation

Amend Section 9.3.2 on page 79 as follows:

Aligned with childcare provision, meeting the requirements of future primary and post-primary aged persons, **including children and young people with special educational needs**, in Dunsink represents a critical element in creating a long-term community.

Based on demographic information recorded by the Census in 2022 and taking cognisance of the national declining birth rate as per CSO data/projections, it is estimated that c.6 no. primary schools and c.4 no. postprimary schools may ultimately be required for Dunsink. The Urban Area Plan makes provision for 10 no. school locations across Dunsink **to accommodate these requirements or, alternatively if required, the sites can facilitate special educational needs schools.**

Amend Table 9.1 on page 77 to add the following text (other content of the table remains unchanged).

Category Infrastructure Resource	Category Infrastructure Resource
Sports and Recreation	• Coolmine Rugby Club • Phoenix Football Club • Elmgreen Golf Club • Play Area (Dunsoghly Drive) • St. Joseph's Horse & Pony Club

Amend Figure 9.1 to include reference to St. Joseph's Horse & Pony Club.

Amend Table 9.2 on page 78 as follows (other content of the table remains unchanged):

Category	Provision
Health and Social Services Sports and Recreation	• Coolmine Rugby Club • Phoenix Football Club • Elmgreen Golf Club • Play Area (Dunsoghly Drive)
Sports and Recreation Health and Social Services	• Ashtown Medical Centre • Village Medical Centre Finglas • Finglas West Family Resource Centre

Inclusive Communities

Summary of Submissions

A number of submissions emphasise that the success of Dunsink will depend on the creation of an inclusive, socially sustainable and well-connected community, supported by community infrastructure, local services, employment opportunities, accessible transport and ongoing community development. Submissions highlight the importance of meaningful engagement with existing and future residents throughout the planning and implementation process and stress that social infrastructure, community organisations, cultural facilities, public spaces and local amenities are essential to fostering community cohesion, social inclusion and long-term wellbeing.

Submissions also emphasise the need for Dunsink to cater for people at different stages of life and from diverse backgrounds, including families, older persons, people with disabilities, young people and those experiencing homelessness. Universal accessibility, age-friendly design and opportunities for interaction between existing and new communities are identified as important components of an inclusive community.

A number of submissions raise concerns regarding the proposed housing mix, tenure profile and affordability of homes within Dunsink. While many submissions support the delivery of social and affordable housing, views differ regarding the appropriate balance between private, social, affordable and cost-rental housing.

Several submissions request greater clarity regarding the proportion of social and affordable homes to be provided and seek a stronger emphasis on affordable and social housing, particularly given the extent of public land ownership within the Plan area. Some submissions propose specific targets for social and affordable housing delivery, while others seek restrictions on the sale or bulk purchase of homes by institutional investors,

private investment funds or Approved Housing Bodies. In contrast, a small number of submissions advocate for a predominantly owner-occupied housing model.

A number of submissions also seek greater clarity regarding the future delivery model for Dunsink, including the potential roles of the Land Development Agency, Approved Housing Bodies, Fingal County Council and private developers, together with the funding mechanisms that may support delivery.

Concerns are also raised regarding the extent of apartment-led development and its ability to deliver a balanced and mixed community. Submissions seek a broad range of dwelling types, sizes and tenures, including family homes, own-door units, duplexes, accessible housing, starter homes, housing for older persons and accommodation suitable for people with disabilities. Some submissions question whether the proposed housing mix will adequately meet the needs of future residents.

Several submissions seek clarity regarding the allocation of social and affordable housing and request assurances regarding who will benefit from new housing within Dunsink. Requests are also made for housing provision to prioritise local need and to provide greater transparency regarding allocation processes.

A number of submissions support the recognition of the existing Traveller community within the Plan area and seek continued provision for Traveller accommodation as part of the future development of Dunsink.

Submissions request greater clarity regarding the future delivery of Traveller-specific accommodation and emphasise the importance of meaningful engagement and consultation with Traveller families, representative organisations and local residents. Views expressed include support for upgrading existing accommodation, providing new Traveller-specific accommodation, expanding existing provision where appropriate and ensuring that any changes affecting existing accommodation are undertaken through consultation and agreement with affected families.

Several submissions also highlight the importance of recognising and supporting Traveller culture and heritage, including established horse and equine traditions, as part of an inclusive and culturally responsive approach to future development.

Chief Executive's Response

The concerns raised regarding housing tenure, affordability and the creation of a balanced community are noted. Section 9.3.3 of the Draft Plan, Creating an Inclusive and Socially Balanced Community, establishes the objective of providing a broad range of

housing typologies and tenures to meet the needs of different household types, including families, older persons, people with disabilities, students, and those requiring social and affordable housing.

Objective IC07 requires that a balanced mix of housing tenures be delivered across the Plan area and seeks to avoid the concentration or dominance of any single tenure type. The objective also promotes tenure-blind development whereby homes of different tenures are integrated throughout neighbourhoods and are indistinguishable in design and appearance. It is considered that the Plan provides an appropriate framework for the delivery of a socially balanced and inclusive community.

The Draft Plan should also be read in conjunction with the Fingal Development Plan 2023-2029 and associated Housing Strategy and national housing policy, all of which seek to deliver a mix of private, social, affordable and cost-rental housing to meet identified needs. The precise tenure mix and the proportion of social and affordable housing delivered on individual sites will be determined through the statutory mechanisms of, and through individual development proposals on the Plan lands.

A number of submissions seek specific quotas for social, affordable, cost-rental or owner-occupied housing, and restrictions on sales to institutional investors. Part V of the Planning and Development Act 2000, as amended/Part 7 of the Planning and Development Act 2024 as amended provide the statutory basis for providing social and affordable housing as part of development proposals. Save for these, there is no statutory or policy basis under Section 28 of the Planning and Development Act 2000, as amended/Section 25 of the Planning and Development Act 2024 as amended to enable a planning authority to stipulate particular tenure mix. The 'Regulation of Commercial Institutional Investment in Housing Guidelines for Planning Authorities' (2023) enable planning authorities and An Coimisiún Pleanála to restrict the purchase of own-door units, that is houses and duplex units, by institutional investment. These guidelines are implemented during the development management process. There is no similar statutory or national policy that facilitates limitations on apartment ownership. The Council will, however, continue to maximise opportunities for the delivery of social, affordable and cost rental housing on publicly owned lands in accordance with national and local housing objectives.

In relation to concerns regarding apartment-led development, the Draft Plan seeks to provide a range of housing typologies, including apartments, duplexes and family-sized homes. There is no specific breakdown of residential units provided for in the Draft Plan. While it is likely that apartment development will form the majority housing typology, there will be a mix of housing typologies across the Plan lands. The detailed mix of

dwelling types will be determined at planning application stage having regard to identified housing need, national policy and development plan standards. The Plan supports housing suitable for families, older people, people with disabilities and younger households and therefore provides sufficient flexibility to accommodate changing demographic requirements over time.

Submissions seeking clarity regarding the delivery model for Dunsink, including the role of the Land Development Agency, Approved Housing Bodies, the local authority and private developers are noted. The specific delivery mechanisms, funding arrangements and development partnerships that may arise over the lifetime of the Plan will evolve in response to Government policy, market conditions and housing need. It is therefore not considered appropriate to prescribe a single delivery model within the Plan.

The comments made regarding housing allocation arrangements are also noted. The management of social housing stock is outside the scope of the Urban Area Plan. In cases where Fingal County Council is responsible for the allocation of Housing Support, this is an executive function which has regard to the provisions of the Allocations Scheme for Social Housing Support.

A key theme arising from submissions is the need to ensure that Dunsink caters for people at different stages of life and from different backgrounds. The Draft Plan supports the delivery of age-friendly communities, universal access and inclusive design principles and seeks to ensure that housing and neighbourhoods are accessible, adaptable and capable of meeting changing needs over time.

The submissions highlighting the needs of older people, people with disabilities, young people, those experiencing homelessness and families are welcomed. The objectives of the Draft Plan support housing choice and flexibility and seek to ensure that future development contributes to social inclusion, community wellbeing and equal participation in community life.

The importance of social infrastructure, community facilities, employment opportunities, cultural facilities and public spaces in fostering community cohesion is also recognised. The Draft Plan acknowledges that creating an inclusive community extends beyond housing provision alone and requires the coordinated delivery of supporting services and amenities, as addressed elsewhere in the Plan.

The submissions relating to Traveller accommodation and inclusion are acknowledged. Section 9.2 of the Plan recognises the longstanding presence of the Traveller community within Dunsink and acknowledges its important contribution to the area's cultural

heritage and identity. The Draft Plan supports the continued inclusion of the Traveller community and facilitates the provision of accommodation specific to the Traveller community. There are specific objectives detailed in the draft Plan to support the provision Traveller accommodation in the Dunsink North, East and South Development Areas (where existing Traveller families reside).

The importance of meaningful and ongoing engagement with Traveller families, representative organisations and other stakeholders in determining future accommodation needs and provision is recognised. The form of future accommodation provision, including improvements to existing sites, new accommodation or a combination of approaches, will be considered through continued consultation and in accordance with the Fingal Traveller Accommodation Programme. Support for Traveller cultural traditions is consistent with the Plan's commitment to recognising and respecting cultural diversity within Dunsink.

Chief Executive's Recommendation

No change.

3.10. Issues relating to Chapter 10 'Economy and Employment'

FIN-C973-40, FIN-C973-76, FIN-C973-337, FIN-C973-338, FIN-C973-343, FIN-C973-347, FIN-C973-357, FIN-C973-503, FIN-C973-601, FIN-C973-754.

Summary of Submissions

Submissions generally support the employment-led, mixed-use approach set out in the Draft Plan but seek stronger provision, integration and timely delivery of employment, retail and commercial uses.

Several submissions request that employment and retail development be delivered in tandem with, or in advance of, residential development in each phase of the Plan to reduce commuting requirements and ensure that economic, service and community needs are met as the area develops. One submission also requests that opportunities be provided for local employment during the construction phase. A further submission seeks greater flexibility in zoning and land use provisions to allow employment or retail floorspace to convert to residential uses should commercial demand not materialise.

A number of submissions emphasise the importance of retail as a key component of community infrastructure and advocate for its coordinated delivery alongside housing, transport and community facilities. Submissions support the provision of vibrant mixed-use centres incorporating a range of retail formats, food and beverage uses, recreation

and services capable of meeting the needs of future residents and workers. The need for appropriately sized commercial units, modern servicing arrangements and facilities to accommodate click-and-collect and home delivery services is also highlighted. Retail provision is further linked to employment generation, economic growth, sustainability and active travel objectives.

Some submissions consider that the Draft Plan does not provide sufficient economic ambition or commercial floorspace to support long-term growth. These submissions advocate a more intensive development model centred on the proposed public transport corridor, incorporating higher-density mixed-use development, significant employment-generating uses, innovation and research hubs, commercial enterprises and supporting retail and civic facilities. It is suggested that increased commercial development could contribute to the delivery of strategic infrastructure and public amenities.

Submissions also raise concerns regarding the continued operation and viability of existing employers and businesses within the area. In particular, concerns are expressed regarding the proximity of proposed residential development to existing businesses and employment, and the potential for land-use conflicts to arise. Assessment and mitigation measures are requested to ensure the continued operation and future development of these facilities. Concerns are also raised regarding the potential impact of filtered permeability measures on River Road and the proposed Tolka Valley Regional Park on existing businesses and access arrangements. Improved connectivity, including a bridge connection between Navan Road Parkway, River Road and Coolmine Rugby Club, is supported as a means of improving accessibility and reducing local traffic congestion.

Postal and logistics services were identified as part of the area's economic and essential infrastructure. The infrastructure-led sequencing approach and recognition of last-mile services were welcomed, alongside a request that postal infrastructure be planned through each development phase with housing, employment, education, transport and utilities. Suggested actions included safeguarding suitably located land, retaining flexibility for future operational facilities, and enabling post boxes, parcel lockers and associated customer facilities in neighbourhood and local centres, public spaces, main and local streets, and mixed-use areas as demand develops. Continued engagement with the Planning Authority was also supported.

Chief Executive's Response

The Draft Dunsink Urban Area Plan supports the creation of a sustainable, mixed-use community where housing, employment, retail, community services and supporting infrastructure are developed in an integrated manner. A key objective of the Plan is to provide opportunities for people to live, work and access daily services within Dunsink,

thereby reducing the need for commuting and supporting the development of complete and self-sustaining neighbourhoods.

The economic strategy set out in the Fingal Development Plan 2023-2029 and reflected in this Draft Plan supports the delivery of strategic growth and employment areas to accommodate future population and employment growth, alongside the consolidation and regeneration of infill, brownfield and underutilised lands. A key objective of the UAP is to deliver new homes in tandem with employment-generating commercial development and a range of supporting services and facilities, including retail, healthcare, education and community infrastructure, to create a sustainable and integrated urban community.

The Plan supports a strong employment-led approach through the provision of a range of employment-generating uses, including office, research and development, education, healthcare, retail and service-based activities. In particular, Dunsink South is designated as a High Technology employment area, supporting office, research and development activities, corporate headquarters and other high-value employment uses within a high-quality built environment.

The Draft Plan also seeks to support the continued operation and expansion of key existing employers in the area, including Teagasc, the National Orthopaedic Hospital Cappagh, New Cross College and Dunsink Observatory. Future development proposals will be required to have regard to existing employment uses and to address potential land use interface issues, including any impacts on established research, education and business operations, through the normal development management process. Issues regarding filtered permeability on River Road and the active travel and public transport bridge are dealt with under Chapter 5, Section 3.5 under the heading of Active Travel. It is intended that access to existing properties along River Road would be retained.

Retail and commercial services are recognised as important components of a successful neighbourhood. The Draft Plan provides for retail development within the East, West and Central Development Areas, ensuring that residents, workers and visitors have access to a range of convenience, comparison and service retail uses. These mixed-use centres are intended to meet local needs, support employment generation, encourage social interaction and contribute to the vitality and vibrancy of the new communities.

The Draft Plan contains a range of objectives (EE01-EE06) that support the provision of retail and commercial services, including the delivery of a balanced mix of retail uses, ground floor convenience retail in neighbourhood locations, active and attractive retail environments, and temporary retail and market uses during early phases of

development. The Draft Plan also supports retail and commercial development that promotes sustainable travel patterns and contributes to an active daytime and evening economy.

The detailed scale, timing and delivery of employment, retail and other commercial uses will be determined through the phased development of the area, having regard to market demand, infrastructure delivery, population growth and the overall objectives of the Plan. It is considered that the Draft UAP provides sufficient flexibility to accommodate a broad range of employment and commercial activities while ensuring that Dunsink develops as a balanced and sustainable urban area.

Chief Executive's Recommendation

No change.

3.11. Issues relating to Chapter 11 'Climate Action'

FIN-C973-557, FIN-C973-627.

Summary of Submissions

A number of submissions request that climate action measures be embedded in the design and delivery of development from the outset. Commitments on sustainable drainage, flood resilience, urban tree planting, green infrastructure and climate adaptation should be strengthened and implemented from the earliest phases. Green infrastructure is presented as essential public infrastructure, indicating that it should be treated as a core requirement of the development of the plan area from the outset.

The integration of renewable energy solutions into the design of homes, community buildings and other development is recommended to support climate objectives and reduce household energy bills. District heating is proposed for consideration as a potentially lower-cost and more efficient alternative to separate heating systems in individual homes. Collectively, these measures seek to combine emissions reduction and climate resilience with affordability and long-term adaptability.

Chief Executive's Response

The Draft Plan promotes the retention and advancement of green infrastructure as a key response to climate change, recognising that through sustainable urban drainage, tree planting, green spaces and other nature-based measures, it can reduce flood risk, manage surface water, enhance biodiversity, reduce urban heat and increase resilience of communities to future climate impacts.

Specifically, objective GI24 of the Draft Plan states that:

'Natural systems should play a central role in shaping the design of public spaces, streets and neighbourhoods. Sustainable drainage, ecological restoration and landscape-led design shall be integrated into the urban fabric from the outset, ensuring that environmental systems work with the development rather than being treated as secondary technical infrastructure.'

Objective GI29 of the Draft Plan states that:

'The landscape network should help address climate challenges by managing surface water, reducing flood risk, increasing tree canopy cover and providing natural cooling within urban areas. Through these measures, the green infrastructure and natural heritage framework will contribute to a healthier microclimate and improve the long-term environmental performance of the development.'

The Draft Plan at Chapter 6 and Section 6.10 supports the transition to a low-carbon and climate-resilient form of development and the integration of renewable and low-carbon energy technologies within future development.

Chapter 11 of the Draft Plan promotes a low-carbon and climate resilient approach by supporting measures that reduce greenhouse gas emissions, improve energy efficiency and increase resilience to the impacts of climate change. It embeds circular economy principles by encouraging the efficient use of resources and waste prevention towards a more sustainable and resource efficient economy. The issue of district heating is dealt with in more detail under Section 6.10 of the Draft Plan and in Section 3.6 of this report.

The incorporation of climate action and renewable energy measures will be considered as part of the design and assessment of individual development proposals through the development management process, having regard to the relevant sustainability policies, objectives and applicable standards of both the Fingal Development Plan and relevant provisions of the Draft Dunsink UAP.

Chief Executive's Recommendation

No change.

3.12. Issues relating to Chapter 12 'Urban Design Framework'

FIN-C973-18, FIN-C973-47, FIN-C973-52, FIN-C973-60, FIN-C973-67, FIN-C973-69, FIN-C973-76, FIN-C973-77, FIN-C973-80, FIN-C973-81, FIN-C973-82, FIN-C973-83, FIN-C973-84, FIN-C973-86, FIN-C973-89, FIN-C973-90, FIN-C973-91, FIN-C973-92, FIN-C973-97, FIN-C973-99, FIN-C973-100, FIN-C973-101, FIN-C973-102, FIN-C973-103, FIN-C973-104, FIN-

C973-105, FIN-C973-106, FIN-C973-108, FIN-C973-109, FIN-C973-110, FIN-C973-111, FIN-C973-113, FIN-C973-115, FIN-C973-116, FIN-C973-119, FIN-C973-121, FIN-C973-123, FIN-C973-125, FIN-C973-126, FIN-C973-127, FIN-C973-128, FIN-C973-130, FIN-C973-131, FIN-C973-133, FIN-C973-135, FIN-C973-136, FIN-C973-138, FIN-C973-139, FIN-C973-140, FIN-C973-142, FIN-C973-143, FIN-C973-144, FIN-C973-146, FIN-C973-149, FIN-C973-150, FIN-C973-153, FIN-C973-154, FIN-C973-155, FIN-C973-156, FIN-C973-159, FIN-C973-161, FIN-C973-165, FIN-C973-166, FIN-C973-167, FIN-C973-168, FIN-C973-169, FIN-C973-177, FIN-C973-180, FIN-C973-182, FIN-C973-183, FIN-C973-184, FIN-C973-187, FIN-C973-188, FIN-C973-189, FIN-C973-190, FIN-C973-191, FIN-C973-192, FIN-C973-193, FIN-C973-194, FIN-C973-195, FIN-C973-196, FIN-C973-197, FIN-C973-198, FIN-C973-199, FIN-C973-201, FIN-C973-202, FIN-C973-203, FIN-C973-204, FIN-C973-205, FIN-C973-206, FIN-C973-207, FIN-C973-208, FIN-C973-209, FIN-C973-210, FIN-C973-212, FIN-C973-215, FIN-C973-216, FIN-C973-217, FIN-C973-218, FIN-C973-220, FIN-C973-221, FIN-C973-223, FIN-C973-224, FIN-C973-225, FIN-C973-226, FIN-C973-228, FIN-C973-229, FIN-C973-233, FIN-C973-235, FIN-C973-237, FIN-C973-240, FIN-C973-241, FIN-C973-242, FIN-C973-244, FIN-C973-247, FIN-C973-251, FIN-C973-272, FIN-C973-278, FIN-C973-279, FIN-C973-280, FIN-C973-281, FIN-C973-287, FIN-C973-291, FIN-C973-294, FIN-C973-295, FIN-C973-298, FIN-C973-302, FIN-C973-319, FIN-C973-321, FIN-C973-327, FIN-C973-334, FIN-C973-337, FIN-C973-338, FIN-C973-342, FIN-C973-345, FIN-C973-350, FIN-C973-352, FIN-C973-356, FIN-C973-357, FIN-C973-360, FIN-C973-362, FIN-C973-364, FIN-C973-365, FIN-C973-366, FIN-C973-367, FIN-C973-368, FIN-C973-372, FIN-C973-373, FIN-C973-374, FIN-C973-375, FIN-C973-377, FIN-C973-389, FIN-C973-402, FIN-C973-404, FIN-C973-409, FIN-C973-429, FIN-C973-437, FIN-C973-441, FIN-C973-453, FIN-C973-459, FIN-C973-463, FIN-C973-464, FIN-C973-469, FIN-C973-475, FIN-C973-477, FIN-C973-488, FIN-C973-500, FIN-C973-504, FIN-C973-508, FIN-C973-509, FIN-C973-511, FIN-C973-516, FIN-C973-517, FIN-C973-535, FIN-C973-543, FIN-C973-545, FIN-C973-551, FIN-C973-553, FIN-C973-557, FIN-C973-560, FIN-C973-561, FIN-C973-564, FIN-C973-569, FIN-C973-575, FIN-C973-577, FIN-C973-585, FIN-C973-591, FIN-C973-593, FIN-C973-601, FIN-C973-610, FIN-C973-612, FIN-C973-621, FIN-C973-624, FIN-C973-626, FIN-C973-627, FIN-C973-636, FIN-C973-644, FIN-C973-655, FIN-C973-659, FIN-C973-661, FIN-C973-663, FIN-C973-665, FIN-C973-667, FIN-C973-671, FIN-C973-672, FIN-C973-678, FIN-C973-681, FIN-C973-682, FIN-C973-684, FIN-C973-691, FIN-C973-692, FIN-C973-695, FIN-C973-699, FIN-C973-701, FIN-C973-704, FIN-C973-705, FIN-C973-708, FIN-C973-717, FIN-C973-719, FIN-C973-723, FIN-C973-724, FIN-C973-725, FIN-C973-726, FIN-C973-727, FIN-C973-728, FIN-C973-729, FIN-C973-730, FIN-C973-731, FIN-C973-733, FIN-C973-734, FIN-C973-735, FIN-C973-736, FIN-C973-737, FIN-C973-738, FIN-C973-739, FIN-C973-740, FIN-C973-741, FIN-C973-742, FIN-C973-743, FIN-C973-744, FIN-C973-745, FIN-C973-746, FIN-C973-747, FIN-C973-748, FIN-C973-749, FIN-C973-750, FIN-C973-751, FIN-C973-752, FIN-C973-753, FIN-C973-756, FIN-C973-757, FIN-C973-758, FIN-C973-759, FIN-C973-760, FIN-C973-761, FIN-C973-762, FIN-C973-763, FIN-C973-764, FIN-C973-765, FIN-C973-766, FIN-C973-767, FIN-C973-769, FIN-C973-770, FIN-C973-771, FIN-C973-772, FIN-

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Dunsink East

Summary of Submissions

The Heritage Council, as a prescribed body, states that the mature hedgerows and tree lines within Dunsink East, including those associated with long-established field boundaries, should be retained and incorporated into the layout of future development, where practicable.

A number of submissions seek the removal of the Dunsink East Development Area from the Draft Plan. Other submissions raise concerns regarding the scale and height of development along the eastern boundary adjoining existing residential areas in Finglas and consider that taller buildings could adversely affect residential amenity, visual amenity and the character of established neighbourhoods.

A submission relating to Scribblestown House and the surrounding lands objects to the identification of these lands as a proposed park location, part of the regional park network, and within the greenway and active travel loop. Concerns are raised regarding the potential impact of these proposals on the use and enjoyment of the lands, access arrangements and the setting of Scribblestown House.

One submission requests that Objective UDF04 be amended to require up to 15% rather than a minimum of 15% employment, commercial, community, cultural and other non-residential uses within mixed-use residential and employment areas. The submission also seeks the inclusion of own-door residential units as a means of providing active frontage. The submission states that active frontages can be achieved through a variety of building typologies and land use arrangements and considers that the current objective places undue emphasis on non-residential uses as the primary means of creating active street frontages. It is further suggested that monitoring compliance with a minimum non-residential use requirement may be challenging in practice.

Chief Executive's Response

The Draft Plan seeks to provide for sustainable development of Dunsink through the delivery of housing, employment, community facilities, open space and supporting infrastructure, while protecting and enhancing existing environmental, landscape and heritage assets.

In relation to the retention of mature hedgerows and tree lines within Dunsink East, the Council acknowledges the important contribution these features make to landscape character, biodiversity and the historic field pattern of the area. This matter is already addressed through Objective GI01, which requires future development proposals to prioritise the retention and reinforcement of existing hedgerows, mature trees and field boundaries and to integrate these features into the design of streets, public spaces and open spaces wherever possible.

The request to remove the Dunsink East Development Area from the Draft Plan is not supported. The lands in question are zoned for residential development in the Fingal County Development Plan. They form an important component of the overall development framework for Dunsink and are required to support the strategic growth objectives of the Plan, including the delivery of housing, supporting infrastructure, community facilities and open space.

Notwithstanding this, in response to concerns regarding potential impacts on residential and visual amenity, a number of amendments are proposed to the Draft Plan which will

recognise the need to ensure an appropriate transition between new development and existing residential areas.

It is proposed to remove the indicative 2-4 storey development block along the eastern boundary and replace it with open space. This open space will provide a buffer between the existing residential areas of Scribblestown Avenue, Valley Park, Woodbank Drive and Woodbank Avenue and the proposed new development area. An additional block is proposed further west of this buffer, to the north of Scribblestown Park. It is also proposed to remove the gateway building located at the north-eastern corner of the plan lands adjacent to the Ratoath Road. This will increase the separation distance between existing housing and future development in this area. The most northern element of the remaining block will be demarcated as a gateway location and the building line of the block as it extends southwards will also be staggered to facilitate a wider set back to the existing adjoining development to the east.

Gateway locations are intended to act as visual landmarks, enhancing the legibility of streets and public spaces and contributing to a strong sense of place. The gateway function can be achieved through high-quality architectural design, active ground floor uses and strong integration with surrounding public spaces. It is recognised that building height is not the sole means of achieving this objective.

To reflect this approach, the indicative 15+ storey height currently associated with gateway locations will be removed from the Height Strategy Diagram. Building heights will instead align with the height parameters identified for the relevant development area in Figure 12.18. Section 12.4.4 should also be amended to clarify that gateway buildings should be distinguished primarily through architectural treatment and design quality rather than height, with the gateway locations illustrated on the Dunsink East and Dunsink West spatial frameworks (Figures 12.4 and 12.9 respectively).

In the Dunsink East Development Area, this approach will result in the gateway locations being reduced from the 15+ storey category to the 7+ storey height category for the location south of Dunsink Lane (this is the same height as shown for this building in the Draft Plan) while the gateway location south of Scribblestown Lane will have a height range of 2-6 storeys, a reduction from the 7+ threshold shown in the Draft Plan. The gateway designation has been removed on the block to the north of Scribblestown Lane, with this height proposed at 2-6 storeys, a reduction from the 7+ threshold shown in the Draft Plan. Notwithstanding these amendments, the appropriateness of any proposed building height or design will be assessed in the context of future planning applications, having regard to the detailed site context and relevant planning considerations.

To further strengthen the protection of adjoining residential areas, it is proposed to introduce a new objective requiring future development proposals to provide an appropriate interface with existing communities and to demonstrate that building height, scale, massing and layout have been carefully designed to protect residential amenity.

The building height strategy, as illustrated in the typical scenarios shown on Figure 12.18 and in Figures 12.19 and 12.20 is for the higher elements to function as spot heights rather than uniform massing. This provides for greater visual interest and assists in providing preferable sunlight to courtyard blocks. In order to clarify this further, a footnote will be added to Figure 12.18.

As set out previously response to the submission received from the Office of the Planning Regulator (OPR), it is considered appropriate to amend the Development Area Characteristics for the Dunsink East and Dunsink Central Development Areas in respect of density. The proposed density range will be revised to allow development from 50 units per hectare during the early phases of development. This amendment will provide greater flexibility in housing delivery, facilitate a broader range of housing typologies and remain consistent with the Compact Settlements Guidelines policy for City Urban Neighbourhoods. Amendments to the plan associated with the OPR recommendations are dealt with in Section 2.3 of this report.

In relation to the lands surrounding Scribblestown House, the proposed open space network and active travel routes identified within the Draft Plan are strategic and indicative in nature. The detailed alignment, design and delivery of these proposals will be subject to further assessment through future planning processes. Any future proposals will be required to have regard to property rights, access arrangements, heritage assets, landscape character and environmental considerations.

With regard to the requested amendment to Objective UDF04, the Council considers that the existing objective provides an appropriate framework for the delivery of mixed-use neighbourhoods. The minimum proportion of non-residential uses is intended to support local employment opportunities, community services, cultural uses and commercial activity, thereby contributing to vibrant and sustainable urban environments and reducing the need to travel. It is noted that other submissions received, particularly in relation to Chapters 9 (Inclusive Communities) and Chapter 13 (Phasing of Development), have emphasised that supporting infrastructure should be delivered in advance of, or in tandem with development. Objective UDF04 is an important component in achieving that.

While own-door residential units can make a positive contribution to street activity and passive surveillance, they do not provide the same level of employment, community or

commercial activity as non-residential uses. It is considered that the current wording of Objective UDF04 remains appropriate and that compliance can be assessed through the development management process. Accordingly, no amendment to Objective UDF04 is recommended.

Chief Executive's Recommendation

Amend Figure 4.2 Spatial Framework on page 20 as follows and illustrated on the revised diagram below:

- Omit the block along the eastern boundary of the Plan lands with Woodbank, Valley Park Road and Scribblestown Avenue residential developments and replace it with open space.
- Include an additional residential block north of Scribblestown Park.
- Omit the block at the northeast corner of Dunsink Lane, adjacent to Westwood Road.
- Stagger the building line of the block west of Westwood and Woodbank Avenue residential developments.
- Remove the gateway location from the block north of Scribblestown Lane at the south east corner of the development area and include a gateway location at the most northeasterly block.
- Revised alignment for the Luas line through the Dunsink West development area and consequential changes (see also Section 2.4 which addresses the submission received from the NTA).



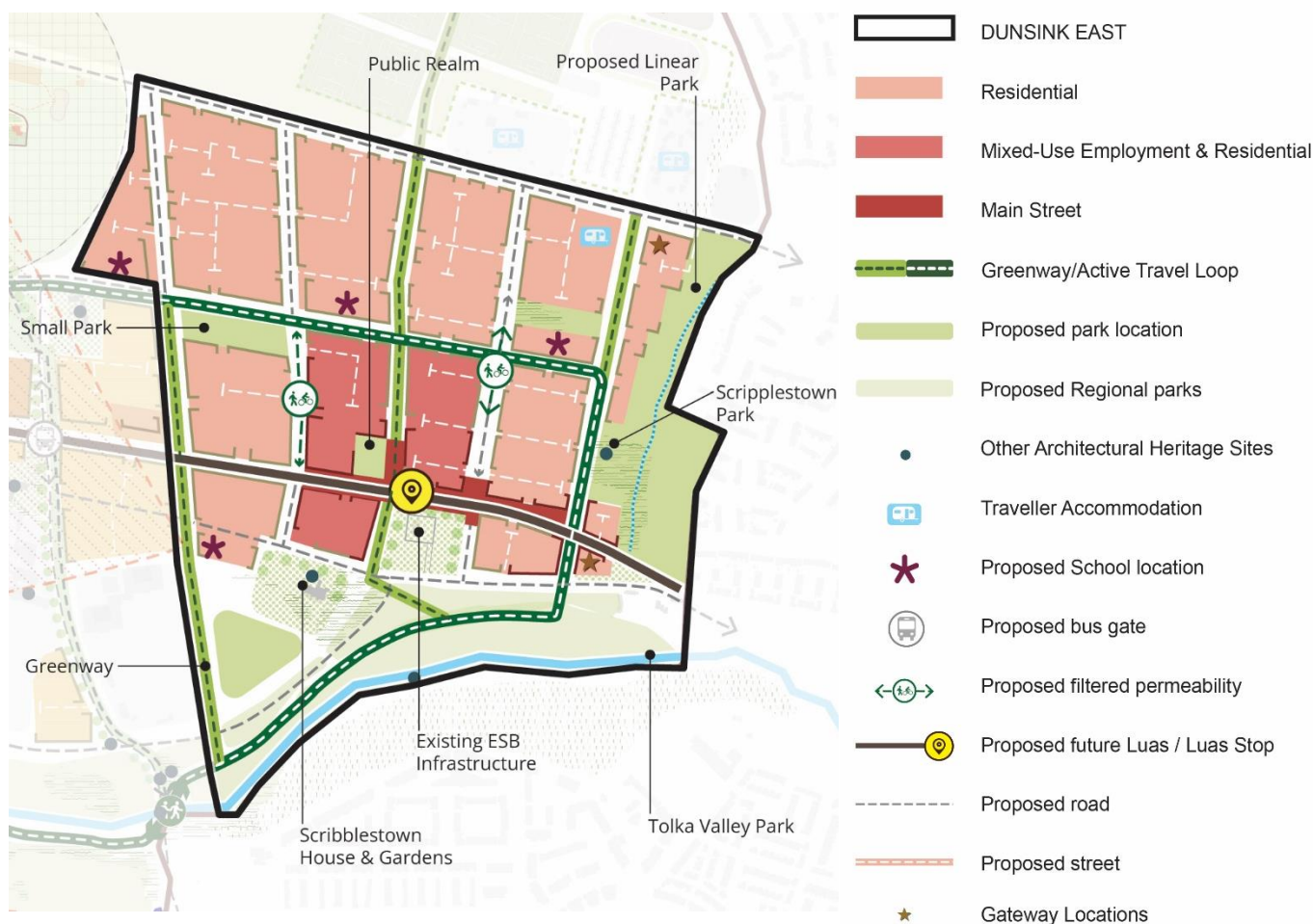
Amend Figure 12.2 Spatial Layout Overview on page 89 as follows and illustrated on the revised diagram below:

- Omit the block along the eastern boundary of the Plan lands with Woodbank, Valley Park Road and Scribblestown Avenue residential developments and replace it with open space.
- Include an additional residential block north of Scribblestown Park.
- Omit the block at the northeast corner of Dunsink Lane, adjacent to Westwood Road.
- Stagger the building line of the block west of Westwood and Woodbank Avenue residential developments.
- Remove the gateway location from the block north of Scribblestown Lane at the south east corner of the development area and include a gateway location at the most northeasterly block.
- Revised alignment for the Luas line through the Dunsink West development area and consequential changes to the block layout in this area (see also Section 2.4 which address the submission received from the NTA).



Amend Figure 12.4 Dunsink East Development Area-Spatial Framework on page 92 as follows and illustrated on the revised diagram below:

- Omit the block along boundary with Woodbank, Valley Park Road and Scribblestown Avenue residential developments and replace it with open space.
- Include an additional residential block north of Scribblestown Park.
- Omit the block at the northeast corner of Dunsink Lane, adjacent to Westwood Road.
- Illustrate proposed gateway building location at southeast corner of the development area include a gateway location at the most northeasterly block.



Amend Section 12.4.4 'Gateway/Landmark Buildings' as follows:

Gateway buildings ~~can be signified by increased height and/or~~ **shall be signified by** distinctive architectural treatment.

....

Fig. 12-18 shows indicative building heights ~~and gateway locations~~ within the Plan lands.

Amend Figure 12.18 Building Heights on page 116 as follows and illustrated on the revised diagram below:

- Omit the block along boundary with Woodbank, Valley Park Road and Scribblestown Avenue residential developments and replace it with open space.
- Include an additional residential block north of Scribblestown Park.
- Omit the block at the northeast corner of Dunsink Lane, adjacent to Westwood Road.
- Remove gateway building designation from blocks shown and replace with height of 2-6 storeys for the blocks to the north and south of Scribblestown Lane in the Dunsink East development area and 15+ storeys height in the Dunsink West development area.
- Include footnote with respect to upper building heights.



Include new objective on page 91 as follows: (number to sequentially follow UDF 22 as listed in the Draft Plan)

Ensure that future development proposals incorporate an appropriate interface with existing residential areas, ensuring that building height, scale, massing and layout are carefully designed to protect residential amenity.

Dunsink Central

Summary of Submissions

The Heritage Council, as a prescribed body, recommend that design proposals to the north of this area need to strongly consider the attributes of the (potential) Outstanding Universal Value of the Historic Astronomical Observatories of Ireland.

Chief Executive's Response

The matters raised by the Heritage Council are addressed in Section 3.8, under the heading Dunsink Observatory, of this report.

As referred to in Section 2.3 of this report, it is proposed to amend the density range for this development area.

Chief Executive's Recommendation

No change.

Dunsink West

Summary of Submissions

The Heritage Council, as a prescribed body, welcomes the identification of Elm Green House as a key heritage feature within the Dunsink West Spatial Framework. The submission recommends that Elm Green House should act as an anchor feature for the development area and that future development blocks, landscaping and planting should be designed to reinforce an appreciation of the building, its setting and its principal elevations.

Transport Infrastructure Ireland (TII), as a prescribed body, requests the inclusion of a site-specific objective within the Urban Design Framework for Dunsink West to ensure the protection of the strategic function, operation and physical integrity of the M50 and associated infrastructure. The submission also highlights the need to safeguard future occupants and users of adjoining lands from potential impacts associated with proximity to the motorway.

Chief Executive's Response

The submissions are welcomed and noted. The significance of Elm Green House as an important heritage asset within Dunsink West is acknowledged. The Draft Plan already identifies the building as a key feature within the spatial framework and future development proposals will be required to respond appropriately to its setting, character and heritage significance through the detailed design process.

It is considered appropriate that, as recommended in the submissions from Transport Infrastructure Ireland, the strategic function, operation and physical integrity of the M50 and its associated infrastructure should be explicitly reflected within the Urban Design Framework. Given the proximity of lands within Dunsink West to the motorway corridor, it is considered appropriate to include a specific objective to ensure that future development protects the operation, maintenance and capacity of the national road network and complies with relevant TII requirements.

In addition, as referred to previously in relation to the Dunsink East Development Area, amendments are proposed to the Draft Plan in relation to gateway buildings. Gateway buildings will no longer be identified through a specific height category on the Building Heights Diagram. Instead, they will be identified within the individual Development Area drawings and the text of the Plan will be amended to clarify that gateway buildings are

intended to perform a placemaking and wayfinding function through high-quality architectural treatment and urban design, rather than through height alone.

The indicative 15+ storey building height category will continue to apply within parts of the Dunsink West Development Area, having regard to its strategic location adjacent to the M50 and the proposed Luas to Tyrrelstown corridor. The appropriateness of the proposed building height of a particular proposal will be assessed as part of future planning applications having regard to detailed design, visual impact and compliance with relevant planning policy.

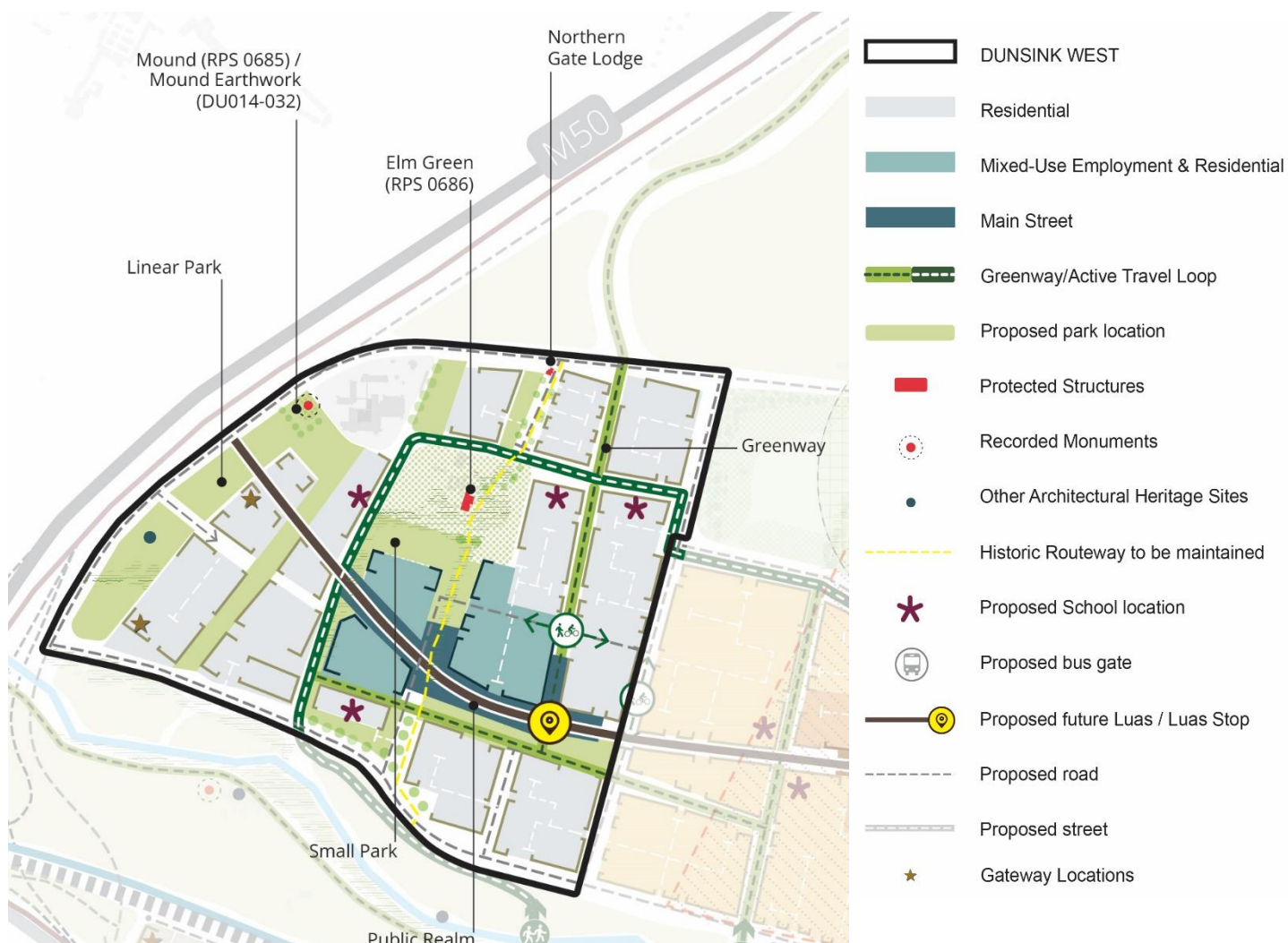
Figure 12.9 Dunsink West Development Area will be amended to reflect this.

In response to the NTA submission, the indicative Luas line alignment has been amended. Section 2.4 of this report has further details in this regard. This shall be reflected in in Figure 12.9 Dunsink West Development Area and the figure, together with all associated figures, will be updated accordingly.

Chief Executive's Recommendation

Amend Figure 12.9 Dunsink West Development Area-Spatial Framework on page 100 as follows and illustrated on the revised diagram below:

- Amend the alignment of the Luas line through the area and the M50 crossing point location.
- Consequentially revise the indicative block layout and the proposed location of the Luas stop in this area.
- Illustrate gateway locations.



Include new objective in this section at page 99 as follows: (numbers to sequentially follow UDF 68 as listed in the Draft Plan)

Development proposals adjoining or affecting national road infrastructure shall protect the M50's strategic function, operation and physical integrity, including drainage, bridges and structures, demonstrate compliance with all relevant TII Publications (Standards and Technical) requirements and ensure that the safety, operation, maintenance and capacity of the motorway and associated assets are not adversely affected.

Cultural Quarter

Summary of Submissions

The Heritage Council, as a prescribed body, states that Section 12.2.4 of the Draft Plan should place greater emphasis on the attributes associated with the potential Outstanding Universal Value (OUV) of Dunsink Observatory as part of the Historic Astronomical Observatories of Ireland. The submission considers that these heritage

attributes should clearly inform the vision, aspirations, development approach and key objectives for the area. It is argued that the potential OUV should not be treated as an additional consideration to be addressed at a later stage but as a fundamental element of the plan-making and design process.

A number of submissions consider that the Dunsink Cultural Quarter requires a stronger heritage-led design rationale and recommend that the significance and setting of the Observatory play a more prominent role in shaping the future development framework.

It is submitted that development proposals, particularly within the northern portion of Dunsink Central, should demonstrate how the layout, scale, form and treatment of development respond to the heritage significance of the Observatory and its setting.

Some submissions objects to the illustrative proposal shown in Figure 12.12 which depicts an opening in the southern boundary wall of Dunsink Observatory to facilitate access and would give rise to security and operational issues.

Chief Executive's Response

The submission from the Heritage Council which considers that the Draft Plan should place greater emphasis on the attributes contributing to the OUV of Dunsink Observatory with these considerations informing the preparation of the Draft Plan from the outset to ensure that the plan appropriately recognises, protects and sustains the sites OUV is acknowledged. Chapter 8 of this report responds to this issue under the heading of Dunsink Observatory.

The Draft Plan at Chapter 8 and specifically Section 8.3.3.2 promotes Dunsink Observatory as a key attractor within the proposed Cultural Quarter recognising its historic and cultural significance and its potential to act as a focal point for visitors and strengthen the identity of the Cultural Quarter as well as supporting wider cultural activity in the area.

Objective AACH13 of the Draft Plan seeks to ensure that, 'Development proposals where relevant, shall incorporate the required landscape setback, high quality and context-sensitive design, appropriately scaled building heights and carefully designed low impact lighting and the protection of key views, informed by an Architectural Heritage Impact Assessment and Visual Impact Assessment, to be undertaken by suitably qualified professionals, in order to protect the scientific and cultural significance of Dunsink Observatory.'

As recommended in Section 3.8 of this report under the heading Dunsink Observatory, Objective AACH13 should be amended to require the use of 3D modelling as part of the assessment of planning applications, where appropriate. This will provide an additional tool to evaluate the potential visual impacts of proposed development on Dunsink Observatory and its setting, and to ensure the protection of its scientific and cultural significance.

Section 3.8 of this report responds to the issues raised relating to Figure 12.12.

Chief Executive's Recommendation

No change.

Dunsink North

Summary of Submissions

The National Orthopaedic Hospital Cappagh (NOHC) supports the proposed greenway network and wider connectivity proposals within Dunsink North, including connections through the Regional Park and Recreational Hub. The submission emphasises that the design and delivery of these connections must protect hospital operations, patient safety and site security. It also requests that the interface between the hospital campus and the Regional Park be designed as a safe, attractive and high-quality transition area and that all walking and public transport infrastructure be designed in accordance with universal access principles.

NOHC supports the proposed public transport improvements and highlights the importance of prioritising accessible public transport provision. The submission also supports the proposed building heights within Dunsink North and notes that future expansion of the hospital campus may require development at these heights, or greater where appropriate.

The hospital further requests that the UAP explicitly recognise and support the long-term growth and intensification of the campus through the inclusion of a specific Key Development Objective. This objective would provide for the preparation of a Masterplan to guide the future development of the campus, including building design, scale and height, green infrastructure, mobility management measures, and connections to the proposed Regional Park and the wider Dunsink area.

Transport Infrastructure Ireland (TII) supports the inclusion of stronger measures to protect the strategic function, operation and physical integrity of the M50 and associated infrastructure. TII requests the inclusion of a specific objective within the Urban Design Framework to ensure that future development adjacent to the motorway does not

adversely affect its operation, safety, maintenance or associated infrastructure, including bridges and drainage assets.

Chief Executive's Response

The Draft UAP recognises the National Orthopaedic Hospital Cappagh as a strategically significant healthcare facility and supports its continued operation, expansion and long-term development. The issues raised regarding hospital accessibility, operations, patient safety, site security and active travel connections will be considered as part of the detailed design and planning application process for future development proposals.

The request for a high-quality interface between the hospital campus and the proposed Regional Park is addressed through Key Development Objective UDF78, which seeks to ensure that future development strengthens the southern edge of Dunsink North through active frontages, passive surveillance and a coherent built form that positively addresses the adjoining parklands. Future infrastructure and public realm improvements will be designed to maintain and enhance access to the hospital while supporting wider connectivity objectives across Dunsink.

The request for a dedicated Masterplan requirement for the hospital campus is noted. However, it is not considered necessary or appropriate to include a specific Key Development Objective requiring the preparation of a Masterplan. Instead, it is considered appropriate to include a new Key Development Objective which explicitly supports the continued operation and future development of the National Orthopaedic Hospital Cappagh and ensures that future development and infrastructure proposals protect hospital operations, accessibility, patient safety and security in accordance with the underlying community infrastructure zoning.

In relation to the submission from Transport Infrastructure Ireland, the strategic importance of the M50 corridor and the need to protect its operation, safety and physical integrity is acknowledged. It is considered appropriate to amend the Draft UAP by including a specific Key Development Objective requiring that development proposals affecting national road infrastructure safeguard the operation, maintenance, safety and capacity of the motorway and associated infrastructure.

Chief Executive's Recommendation

Include two new objectives in the section as follows: (numbers to sequentially follow UDF 84 as listed in the Draft Plan)

To support the continued operation and future development of the National Orthopaedic Hospital Cappagh and ensure that future development, including road

connections, public transport infrastructure and active travel routes, reinforces and protects hospital operations, accessibility, patient safety and security.

Development proposals adjoining or affecting national road infrastructure shall protect the M50's strategic function, operation and physical integrity, including drainage, bridges and structures, demonstrate compliance with all relevant TII Publications (Standards and Technical) including the Spatial Planning and National Roads Guidelines and ensure that the safety, operation, maintenance and capacity of the motorway and associated assets are not adversely affected.

Dunsink South

Summary of Submissions

The Heritage Council states that the Draft Plan does not adequately recognise the Royal Canal as a proposed Natural Heritage Area (NHA) within the relevant development area objectives. The submission recommends the inclusion of a specific objective to protect and enhance the canal's natural heritage value and to ensure appropriate buffers and sensitive development along its southern bank.

Several submissions also support the proposed green corridor and greenway connection between Navan Road Parkway Station and the Dunsink lands. These submissions request that Objective UDF 89 be amended to explicitly provide for pedestrian and cycle connections to existing community facilities, including Coolmine Rugby Club, where feasible and practicable.

Chief Executive's Response

The submissions are acknowledged and welcomed. The Royal Canal is an important heritage, biodiversity and recreational asset. The status of the canal as a proposed Natural Heritage area is detailed in Section 7.4 of the Draft Plan and the Draft Plan recognises the importance of the canal and fully integrates it into the green infrastructure network in the Plan lands. It is considered appropriate to amend the text of the Draft Plan relating to the Dunsink South development area to provide similar reference and to clearly recognise the need to protect both the built and natural heritage value of the canal and to ensure that development in its vicinity is undertaken sensitively.

The request to extend active travel access to Coolmine Rugby Club has been discussed in Section 3.5 of this report under the heading Proposed Active Travel Provision and as stated, it is recommended that this access should be provided as part of the active travel bridge if feasible.

Chief Executive's Recommendation

Amend Objective UDF89 at page 107 as follows:

Provide pedestrian and cycle linkages to the wider Plan lands, surrounding neighbourhood and key public transport infrastructure, particularly the Navan Road Parkway rail station **and including the provision of such linkages to existing community facilities, such as the Coolmine Rugby Club lands, where feasible.**

Include new objective in the section at page 107 as follows: (numbers to sequentially follow UDF 92 as listed in the Draft Plan)

Protect and enhance the built and natural heritage of the Royal Canal and ensure that development along it or within its vicinity is sensitively designed and does not have a detrimental effect on the character of the Canal, its built elements and its natural heritage values. Works to the built fabric of the Royal Canal should have regard to Waterways Ireland's Heritage and Biodiversity Plan 2030 and Guidelines for Conservation of Built Heritage-Repair and maintenance of heritage structures on the inland waterways of Ireland, (2015).

Regional Park and Recreational Hub

Summary of Submissions

The proposed Regional Park and Recreational Hub was generally welcomed as a significant opportunity to provide high-quality public open space, recreation, health and community facilities within Dunsink. Many submissions supported the creation of an inclusive and accessible destination offering a wide range of active and passive recreational uses, connected by safe walking and cycling routes and integrated with the wider green infrastructure and landscape network.

Several submissions emphasised the need for the park to respond sensitively to existing ecological, landscape and heritage features and to provide facilities that can serve both existing and future communities. A number of submissions also requested that the Regional Park and Recreational Hub incorporate a diverse range of recreational, sporting and community facilities.

Submissions further highlighted the importance of addressing the relationship between the proposed park and the M50. It was requested that the Plan include clear provisions to ensure the protection of the strategic function, operation and physical integrity of the motorway and associated infrastructure, while safeguarding park users and ensuring compliance with relevant national road requirements.

Chief Executive's Response

The strong support expressed for the proposed Regional Park and Recreational Hub is welcomed including the acknowledgement of its importance in providing high-quality open space, recreation, health and wellbeing opportunities for both existing and future communities. The Draft Plan seeks to establish a multifunctional regional destination that supports a broad range of active and passive recreational uses and is integrated with the wider green infrastructure, active travel and landscape networks across Dunsink.

The submissions seeking an inclusive and accessible recreational hub connected by safe walking and cycling routes and designed to respond appropriately to the area's ecological, landscape and heritage assets are noted. As set out in Section 12.2.7 and objective UDF93 of the Draft Plan, the detailed design and delivery of the Regional Park and Recreational Hub will be informed by the preparation of a comprehensive Recreational Plan, which will establish a clear vision for the park, guide the provision of facilities and activities, and ensure its development in a coordinated and sustainable manner that maximises long-term recreational and community benefits.

The submissions regarding the relationship between the Regional Park and the M50 are noted. Any future development proposals within or adjoining the park will be required to have regard to the operational, safety and infrastructural requirements of the national road network and ensure that the function, operation and integrity of the M50 are protected. It is recommended to include an additional objective to give effect to this.

Other matters relating to the Regional Park and Recreational Hub are addressed in this report at Section 3.7 under the heading Recreation and Open Space.

Chief Executive's Recommendation

Include new objective in the section at page 109 as follows: (numbers to sequentially follow UDF 103 as listed in the Draft Plan)

Development proposals adjoining or affecting national road infrastructure shall protect the M50's strategic function, operation and physical integrity, including drainage, bridges and structures, demonstrate compliance with all relevant TII Publications (Standards and Technical) including the Spatial Planning and National Roads Guidelines and ensure that the safety, operation, maintenance and capacity of the motorway and associated assets are not adversely affected.

Tolka Valley Regional Park

Summary of Submissions

The Heritage Council, as a prescribed body, strongly supports the policy provisions relating to the Tolka Valley Regional Park and its role within the emerging green infrastructure network.

A number of submissions highlight the importance of the Tolka Valley Regional Park as a significant landscape, ecological, recreational and amenity resource. These submissions request that the Draft Plan strengthens connections to the park while ensuring that future development does not adversely affect its character, biodiversity, recreational function, visual amenity, or environmental quality.

Several submissions support enhanced walking and cycling connections, the continuity of green infrastructure networks, and the sensitive treatment of development adjoining the park. Submissions emphasise the need for appropriate interfaces between future development and the park, including good accessibility, passive surveillance and overlooking, while retaining landscape buffers and protecting biodiversity and recreational amenity.

A submission from the owners of Ashbrook House objects to the inclusion of the property within the Tolka Valley Regional Park designation. The submission states that the inclusion of the lands within a public regional park could create uncertainty regarding the future use, management and accessibility of the property. The submission requests either the removal of Ashbrook House from the park boundary or the inclusion of a site-specific objective recognising its status as a protected structure in private residential use and safeguarding existing vehicular access from River Road.

Submissions also request that Ashton House and other lands south of River Road be removed from the proposed regional park and identified as suitable for residential development.

One submission objects to the inclusion of the Dublin Grass Machinery lands within the proposed extension of the Tolka Valley Regional Park, citing concerns that the designation could restrict the future operation, development or expansion of the existing business.

A number of submissions also request that the extension to the Tolka Valley Regional Park only should only extend as far south as the planned greenway on River Road with lands between River Road and the Royal Canal instead identified as suitable for residential development.

Chief Executive's Response

The proposed Tolka Valley Regional Park is a central element of the Draft Plan and will provide a significant landscape, biodiversity, recreation and amenity resource for both existing and future communities. The park will play an important role in delivering an integrated green infrastructure network, enhancing ecological connectivity, providing opportunities for recreation and active travel, and protecting the environmental qualities of the Tolka Valley.

The support expressed for the protection and enhancement of the proposed Regional Park is welcomed and the importance of ensuring that development adjoining the park is appropriately designed is acknowledged. Future development proposals will be required to provide high-quality interfaces with the park that support accessibility, passive surveillance, biodiversity enhancement, landscape character and recreational amenity, in accordance with the objectives and development principles of the Plan.

The Tolka Valley Regional Park is zoned High Amenity ('HA') in the Fingal County Development Plan 2023-2029 and is a key element of the Draft Plan. An Urban Area Plan must be materially consistent with the zoning objectives of a development plan therefore it is not within the remit of the Plan to identify these lands for residential purposes.

In relation to Ashbrook House and Ashton House and the surrounding lands, the importance of protecting the heritage significance and setting of protected structures is recognised. However, given the strategic scale and function of the proposed Regional Park, it is not considered appropriate to exclude these protected structures from the park boundary. The inclusion of lands within the Regional Park does not alter ownership or imply public access to private lands. Existing objectives within the Draft Plan and Development Plan provide for the protection of protected structures, their settings and existing access arrangements.

Similarly, the request to remove lands south of River Road, including Ashbrook House lands or the Dublin Grass Machinery lands, from the proposed Regional Park is not considered appropriate. The inclusion of these lands forms part of a comprehensive vision for the expansion of the Tolka Valley Regional Park and the creation of a connected landscape and recreational corridor. The underlying land use zoning remains unchanged and any amendments to zoning objectives would be a matter for consideration through a future development plan process rather than through the Urban Area Plan process. Any future development or expansion of existing uses would be subject to detailed assessment, design, planning processes and consideration of existing land uses and property interests, through the development management process, which includes statutory public consultation stages to address issues of concern.

Accordingly, no amendment to the park boundary or land use designations is considered necessary.

Chief Executive's Recommendation

No change.

Scale and Density of Development

Summary of Submissions

A number of submissions raise concerns regarding the scale and density of development proposed within the Draft Plan and the potential impacts on existing communities, landscape character and residential amenity. Concerns include overlooking, loss of privacy, overshadowing, visual impact, changes to the skyline and the relationship between higher-density development and established lower-rise neighbourhoods. Some submissions advocate for lower-density and lower-rise forms of development, including greater provision of private gardens and more gradual transitions at sensitive interfaces.

Conversely, a number of submissions support compact growth and higher-density development in recognition of the need to deliver additional housing and make efficient use of strategically located lands. These submissions emphasise that higher densities should be accompanied by high-quality design, public transport infrastructure, community facilities, open space and recreational amenities.

Several submissions state that density should be determined having regard to local context, accessibility, infrastructure capacity, urban design quality, landscape considerations and placemaking objectives, rather than solely by numerical density targets.

Some submissions contend that the proposed density ranges are overly broad and lack sufficient clarity regarding the form and intensity of development that may be delivered across the Plan area.

A number of submissions question the appropriateness of the proposed densities in locations further from existing rail stations and public transport infrastructure. These submissions state that lands closer to existing public transport services should accommodate higher densities and that the proposed density strategy is not sufficiently aligned with current levels of accessibility.

Several submissions raise concerns that the proposed density ranges may affect the viability and deliverability of development and could limit the provision of a diverse range

of housing typologies, including terraced housing, duplexes, courtyard housing and family-orientated homes.

Submissions also query whether the proposed density ranges are consistent with the overall housing delivery targets for the Plan area and seek clarification on how the density strategy compares to previous studies and assessments prepared for the Dunsink lands.

Some submissions state that a larger portion of the lands, including areas zoned High Amenity, should be included within the development area in order to achieve the proposed housing numbers at lower overall densities.

A number of submissions advocate for a phased and context-responsive approach to density, with development intensity varying across the Plan area to reflect proximity to public transport, heritage assets, landscape features, existing communities, and the availability of services and infrastructure.

Chief Executive's Response

The Draft Plan seeks to deliver compact and sustainable growth in accordance with national and regional planning policy while supporting the efficient use of strategically located lands within the Dublin Metropolitan Area. The density strategy is intended to facilitate the delivery of new homes while creating a sustainable and well-served urban neighbourhood.

The proposed density ranges are indicative and are not intended to result in a uniform pattern of development across the Plan area. The scale, density and form of development will be influenced by a range of factors, including phasing, local context, proximity to existing and planned public transport, landscape and heritage considerations, existing residential interfaces, urban design principles, open space provision and placemaking objectives. Accordingly, density will be applied in a manner that responds to the specific characteristics of each development area.

The concerns regarding the potential impacts of higher-density development on existing residential areas are acknowledged. A number of amendments are recommended to the Dunsink East Development Area to alleviate these. These are detailed in Section 3.12 of this report under the heading Dunsink East. Detailed considerations such as overlooking, privacy, overshadowing, visual impact and the relationship with adjoining development will be assessed at the planning application stage.

In relation to concerns regarding accessibility and public transport, the Draft Plan adopts a long-term, plan-led approach to growth. The initial phase of development includes

proposals to facilitate access to existing rail services and new bus services and the area is also planned to benefit from significant investment in sustainable transport infrastructure, including DART+ West, BusConnects and the proposed Luas extension. The density strategy is designed to support both existing and planned transport infrastructure and to encourage a shift towards more sustainable patterns of travel.

The importance of providing a broad range of housing typologies and tenures to support mixed and balanced communities is recognised and supported in the Draft Plan. The density ranges proposed do not preclude the delivery of houses, duplexes, courtyard developments or apartments and provide flexibility to respond to future market conditions, design requirements and community needs.

The density strategy has been informed by national planning policy, including the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024), as well as revised housing targets and the strategic objectives of the Fingal Development Plan. While previous studies informed the evolution of the Draft Plan, the current density approach reflects the most recent policy context and housing requirements.

Section 12.3 of the Draft Plan clarifies the distinction between the gross and net development areas for Dunsink. It should be noted that portions of the lands are not suitable for residential development, including the former landfill site, while lands subject to certain zoning objectives such as High Amenity are not intended to accommodate residential development. The calculation of a net development area has been carried out in order to assess the potential unit numbers that could be accommodated in the Plan lands and inform infrastructure planning. The figures in Section 12.3 and the development area characteristics tables which relate to the Dunsink East, Central and West development areas, are not intended to be prescriptive. It is recognised that the overall net development area specified may change having regard to the specifics of individual development proposals which are brought forward through the development management process. It is recommended that the text of the Draft Plan be clarified to amend this.

Having regard to the submissions received and the observations of the Office of the Planning Regulator, it is recommended that the density ranges for the Dunsink East, Central and West Development Areas be amended while remaining consistent with national guidance and the overall objectives of the Draft Plan. The amendment in this regard is dealt with in Section 2.3 of this report.

Chief Executive's Recommendation

Amend Section 12.3 Scale and Density of Development as follows:

The gross plot area of the East, Central and West development areas constitutes c.165 hectares. The calculated net residential area of this land is c.102 hectares. The net residential area excludes non-residential uses such as reserved school sites, proposed parks, commercial and community uses. The overall net residential density figures for the East, Central and West development areas align with those set out in the Sustainable Residential Development and Compact Settlement Guidelines (2024) for City-Urban Neighbourhoods between 50-250 dph. **It should be noted that the net residential area of c.102 hectares is indicative only. This figure may be subject to change as individual development proposals are brought forward.**

Inclusive Lifetime Communities

Summary of Submissions

A number of submissions emphasise the need for a balanced mix of housing types to meet the needs of residents at different stages of life and to support the creation of diverse, inclusive and sustainable communities. These submissions advocate for a range of housing typologies, including own-door houses, duplexes and apartments, to provide choice and accommodate changing household needs over time.

Some submissions express concern that the Draft Plan places too much emphasis on apartment development and request greater provision of family housing and own-door dwellings.

Several submissions also raise concerns regarding the viability of apartment delivery, particularly outside the most valuable locations. These submissions contend that a greater proportion of own-door housing, duplexes and medium-density development would improve delivery prospects and reduce reliance on State intervention. In this regard, submissions seek increased flexibility in relation to residential density and built form to facilitate a broader range of housing typologies.

Chief Executive's Response

The Draft Plan seeks to deliver sustainable, mixed and inclusive communities through the provision of a broad range of housing types, sizes and tenures. The Plan recognises the importance of providing housing choice to cater for households at different stages of life and with varying needs.

The proposed residential framework does not rely on a single housing typology. Rather, it promotes a diverse mix of development, including own-door houses with private gardens, duplexes, lower-rise residential units and apartment buildings. This approach is

intended to support age-friendly communities, facilitate lifelong living and create balanced neighbourhoods with a diverse resident population.

The Draft Plan also recognises the importance of flexibility in housing delivery. The proposed density ranges are not prescriptive and allow for a variety of housing forms across the development areas, having regard to location, context, accessibility and urban design considerations. This will enable the delivery of a range of housing typologies while supporting the overall objective of compact and sustainable growth in accordance with national and regional planning policy.

Chief Executive's Recommendation

No change

Urban Design and Placemaking

Summary of Submissions

A number of submissions support a people-centred and place-based approach to the development of Dunsink and emphasise the need to create distinctive neighbourhoods with a strong sense of identity. Submissions highlight the importance of delivering high-quality public realm, accessible open spaces, community facilities, active travel infrastructure and mixed-use development to support vibrant and sustainable communities.

Many submissions advocate a landscape-led and heritage-informed approach to development. It is requested that existing landscape features, including hedgerows, trees, field patterns, waterways and open spaces, together with heritage assets such as Dunsink Observatory, should act as key structuring elements in shaping future development. Submissions state that these features should inform development layouts, public spaces and neighbourhood character, while protecting important views and ensuring sensitive transitions between new development and existing communities, parks and environmentally significant areas.

A number of submissions seek a neighbourhood-based approach, whereby Dunsink is planned as a series of walkable, mixed-use neighbourhoods supported by community infrastructure, sustainable transport and high-quality public spaces. Submissions emphasise the importance of ensuring that infrastructure, open space and community facilities are delivered in tandem with development to create inclusive and liveable communities.

Some submissions request that community safety and crime prevention principles be incorporated into the design process through the provision of active frontages, natural

surveillance, well-overlooked public spaces, appropriate lighting, clear visibility and safe movement networks.

A number of submissions consider that, given the scale and complexity of the proposed development, the Draft Plan should be supported by a more detailed urban design framework, including three-dimensional modelling and visualisations illustrating building heights, streetscapes, open spaces and infrastructure. These submissions seek greater clarity regarding how the proposed urban structure and design principles will translate into future development.

Overall, submissions seek stronger and more prescriptive urban design guidance to ensure that landscape, heritage, placemaking, accessibility, sustainability and community safety considerations are fully integrated into the future development of Dunsink.

Chief Executive's Response

The issues raised are substantially addressed through the Draft Plan's urban design, placemaking, movement and green infrastructure frameworks, which seek to deliver a coherent, people-centred and sustainable urban structure for Dunsink. The Plan promotes the creation of distinctive neighbourhoods supported by a network of high-quality streets, public spaces, community facilities, parks and active travel connections. It aims to ensure that future development is integrated with surrounding communities while responding to the unique landscape, heritage and environmental characteristics of the area.

The Draft Plan adopts a landscape-led and heritage-informed approach to development. Existing landscape features, including hedgerows, trees, watercourses, field boundaries and heritage assets such as Dunsink Observatory, are identified as key structuring elements that will help shape the character and identity of future development areas. Development proposals will be required to demonstrate how these features have informed site layout, urban structure, open space provision and placemaking.

The Draft Plan also promotes the delivery of walkable, mixed-use neighbourhoods with a strong emphasis on accessibility, inclusion and sustainable movement. Community infrastructure, open space, active travel networks and public transport infrastructure are integrated throughout the framework to support the creation of vibrant and sustainable communities as development progresses.

In relation to crime prevention and community safety, the Draft Plan incorporates principles of passive surveillance, active frontages, legible street networks and well-overlooked public spaces and routes. The detailed design of buildings, streets, parks,

greenways and public spaces will be required to further demonstrate compliance with best practice in relation to safety, accessibility and inclusive design at planning application stage.

With regard to requests for three-dimensional modelling and a more comprehensive urban design framework, the Draft Plan establishes the overarching spatial structure, place-making principles and development parameters for the area. More detailed design matters, including visualisations, three-dimensional modelling, townscape assessment and heritage impact assessment, will be considered as part of future planning applications, where appropriate.

In particular, proposals affecting sensitive heritage assets or significant views may be required to provide 3D modelling and visual impact assessments to demonstrate compliance with the objectives of the Plan. The change to Objective AACH13 at Section 3.8 under the heading Dunsink Observatory of this report addresses this.

Chief Executive's Recommendation

No change.

Building Heights

Summary of Submissions

A number of submissions raise concerns regarding the proposed building heights, scale and massing across the Draft Plan area. Concerns are particularly focused on locations where taller buildings may adjoin established residential communities, including Valley Park, Scribblestown Estate and Scribblestown Lane. The principal issues identified relate to overlooking, loss of privacy, overshadowing, reduced daylight and sunlight, visual intrusion, impacts on landscape character, and changes to the existing skyline and residential character of surrounding areas.

Several submissions contend that the existing topography of the Dunsink lands would increase the prominence of taller buildings and accentuate their visual impact when viewed from surrounding neighbourhoods. It is argued that the proposed heights would appear out of scale with the prevailing character and form of existing residential development.

Some submissions link concerns regarding building height to the overall density and scale of development proposed within the Draft Plan area and call for a more context-led and graduated approach to the distribution of density and height across Dunsink.

Conversely, a number of submissions support higher-density development and increased building heights in appropriate locations as a means of addressing housing need, supporting compact growth and making efficient use of strategically located lands.

Specific submissions relating to Dunsink Observatory request that development in the vicinity of the Observatory should be subject to additional height restrictions in recognition of its heritage significance and setting. Submissions seek explicit recognition within the Draft Plan that the Observatory should be a key determinant of building height and scale in adjoining development areas and that future development should respond appropriately to this important heritage asset and request inclusion of a statement to that effect in Section 12.4.4 Building Heights (p.116).

Chief Executive's Response

The Draft Plan seeks to deliver a sustainable and well-connected urban quarter in accordance with national and regional planning policy which promotes compact growth, increased housing delivery and the efficient use of strategically located lands. The building height strategy forms part of a broader framework that provides for a range of housing typologies, densities and building forms across the Plan area.

The Council acknowledges the concerns raised regarding the potential impact of building height on existing residential communities, particularly in relation to overlooking, privacy, daylight and sunlight, visual amenity and the transition between new and established neighbourhoods. Building heights within the Draft Plan have been informed by a detailed assessment of local context, topography, landscape character, heritage assets, existing residential development and planned transport infrastructure. The proposed building height ranges are indicative and provide flexibility for future development proposals while ensuring an appropriate response to site-specific circumstances.

The building height strategy of the Draft Plan is not intended to apply a uniform height pattern across the Plan area and has regard to the varying characteristics and sensitivities of individual development areas. Future planning applications will be required to demonstrate that proposals protect residential amenity and provide appropriate transitions in scale and massing.

In relation to Dunsink Observatory, the Draft Plan recognises its importance as a nationally significant heritage asset. The building height strategy has been informed by the need to protect the setting and significance of the Observatory, with building heights generally stepping down in its vicinity and increasing towards less sensitive locations. The protection of the Observatory and its setting is addressed through the heritage policies

and objectives set out in Chapter 8 of the Draft Plan. Issues relating to Dunsink Observatory are dealt with in Section 3.8 of this report.

Having regard to the concerns raised in submissions regarding impacts on residential and visual amenity, it is considered appropriate to strengthen the interface between future development and existing residential areas to the east of the Plan lands. As discussed previously, amendments are proposed to the Dunsink East Development Plan to create an increased landscape buffer between new development and existing residential communities and to amend the height and identification of gateway locations. These are set out previously in this report at Section 3.12 under the heading Dunsink East.

Chief Executive's Recommendation

No change.

Public Lighting in the Landscape

Summary of Submissions

Submissions generally acknowledge the importance of lighting in supporting safety, security and the use of streets, walking and cycling routes, parks and public spaces. However, significant concerns are raised regarding the potential impacts of external lighting on landscape character, biodiversity, residential amenity, dark sky conditions and the operation of Dunsink Observatory.

A number of submissions seek a carefully managed lighting strategy that limits lighting to where it is necessary and minimises glare, light spill, upward light emission and excessive levels of illumination. Recommendations include the use of directional lighting fixtures, warm-coloured or ecologically sensitive lighting, dimming and timing controls, and the application of different lighting standards depending on the character and sensitivity of the receiving environment.

Many submissions emphasise the importance of protecting dark skies, wildlife corridors and the setting and scientific operation of Dunsink Observatory. It is submitted that lighting should be considered as a key component of urban design, landscape design and ecological planning from the outset, rather than solely as a technical infrastructure requirement.

Some submissions note that the Draft Plan's provisions relating to light pollution and night-time brightness should be considered in the context of Proposed Variation No. 3 to the Fingal Development Plan 2023-2029.

A number of submissions consider that the Draft Plan adopts an overly narrow focus on public lighting and should instead address all forms of external lighting, including commercial, recreational and sports lighting, transport infrastructure lighting, building illumination, signage and digital advertising displays.

Submissions also request the inclusion of more robust and measurable lighting standards, together with requirements for lighting impact assessments, ongoing monitoring and consultation with stakeholders where appropriate. Some submissions further seek recognition of dark sky protection as a strategic objective that contributes to biodiversity protection, cultural heritage, climate action and environmental sustainability objectives.

Chief Executive's Response

The Draft Plan recognises the sensitive environmental, ecological and heritage context of the area and seeks to ensure that all external lighting is carefully designed and managed to minimise adverse impacts while continuing to provide safe and attractive public spaces. The Plan promotes a low-impact lighting approach that avoids unnecessary illumination, light spill, glare and sky glow and encourages the use of appropriate lighting levels, directional fittings, warm-coloured lighting and other best-practice measures where required.

The Draft Plan already includes a number of provisions aimed at protecting the operational integrity of Dunsink Observatory. Objective UDF7 seeks to protect the operational integrity of the Observatory through the implementation of a low-impact lighting approach while Objective UDF117 requires that planning applications incorporating public lighting be accompanied by a detailed lighting design demonstrating compliance with the principles set out in the Plan. Section 12.5 further provides that lighting design will be informed by recognised best-practice guidance, including guidance relating to dark sky protection and light pollution reduction.

As outlined previously in Section 2.2 of this Report, it is recommended that Section 12.5 of the Draft Plan should be amended to clarify that the guidance relates to all forms of external lighting and not solely public lighting. This includes commercial, recreational and sports lighting, transport-related lighting, architectural lighting, illuminated signage and other external lighting sources that have the potential to impact on the observatory, biodiversity and environmental quality. In addition, it has been previously recommended to include additional objectives requiring lighting impact assessments for proposals which include external lighting and restricting advertising displays which would result in negative impacts associated with lighting.

Chief Executive's Recommendation

No change.

3.13. Issues relating to Chapter 13 'Phasing of Development'

FIN-C973-4, FIN-C973-5, FIN-C973-8, FIN-C973-12, FIN-C973-14, FIN-C973-19, FIN-C973-20, FIN-C973-24, FIN-C973-34, FIN-C973-35, FIN-C973-55, FIN-C973-61, FIN-C973-77, FIN-C973-78, FIN-C973-80, FIN-C973-90, FIN-C973-93, FIN-C973-99, FIN-C973-104, FIN-C973-107, FIN-C973-108, FIN-C973-113, FIN-C973-122, FIN-C973-129, FIN-C973-146, FIN-C973-148, FIN-C973-151, FIN-C973-167, FIN-C973-175, FIN-C973-183, FIN-C973-213, FIN-C973-217, FIN-C973-219, FIN-C973-220, FIN-C973-227, FIN-C973-237, FIN-C973-240, FIN-C973-241, FIN-C973-244, FIN-C973-272, FIN-C973-279, FIN-C973-291, FIN-C973-316, FIN-C973-317, FIN-C973-320, FIN-C973-321, FIN-C973-339, FIN-C973-343, FIN-C973-347, FIN-C973-352, FIN-C973-352, FIN-C973-355, FIN-C973-357, FIN-C973-368, FIN-C973-389, FIN-C973-394, FIN-C973-395, FIN-C973-402, FIN-C973-404, FIN-C973-405, FIN-C973-429, FIN-C973-429, FIN-C973-459, FIN-C973-475, FIN-C973-478, FIN-C973-488, FIN-C973-495, FIN-C973-497, FIN-C973-504, FIN-C973-506, FIN-C973-509, FIN-C973-511, FIN-C973-535, FIN-C973-553, FIN-C973-557, FIN-C973-561, FIN-C973-569, FIN-C973-591, FIN-C973-612, FIN-C973-621, FIN-C973-623, FIN-C973-645, FIN-C973-650, FIN-C973-663, FIN-C973-667, FIN-C973-674, FIN-C973-678, FIN-C973-682, FIN-C973-684, FIN-C973-699, FIN-C973-701, FIN-C973-704, FIN-C973-705, FIN-C973-732, FIN-C973-776, FIN-C973-780, FIN-C973-782, FIN-C973-783, FIN-C973-791, FIN-C973-829, FIN-C973-841, FIN-C973-846, FIN-C973-885, FIN-C973-912, FIN-C973-985, FIN-C973-1065, FIN-C973-1134, FIN-C973-1146.

Sequencing of Development

Summary of Submissions

A number of submissions raised the issue that development at Dunsink should be infrastructure led rather than housing led. It is noted that the Draft Plan proposes c18,000 new homes and it is stated that substantial transport, utility, water, wastewater and community infrastructure will be required to support development of this scale. Submissions stated that existing infrastructure, schools, healthcare facilities and community services in this area are already operating at or near capacity. They state that development should avoid repeating past experiences where housing outpaced infrastructure. Specific reference is made to the development of areas in the vicinity including Pelletstown, Rathborne and Royal Canal Park where, it is stated, that residential development proceeded ahead of supporting services and facilities. Submissions express the view that Dunsink should be developed in a manner that avoids repeating the shortcomings of previous developments.

Arising from this, the submissions argue that new housing should only proceed, or as stated in some submissions, should not be occupied, unless supporting infrastructure is delivered before or at the same time as residential occupation.

Some submissions seek stronger and more enforceable phasing arrangements, including legally enforceable infrastructure delivery milestones, clear 'triggers' linking housing occupations to the completion of infrastructure or requirements that future development phases cannot proceed until agreed infrastructure is operational. Reference is made to including triggers linking housing to services, schools, healthcare capacity being available, transport services being operational and road links/active travel facilities being completed. It is specifically requested that the text in Chapter 13 which states "Infrastructure requirements set out here are indicative and will be determined on a case-by-case basis" be removed from the Plan.

A number of submissions specifically refer to transport infrastructure in the context of phasing. It is contended that the commencement of phase 1 would be premature prior to road network and public transport upgrades. The delivery date of post 2042 for the Luas extension is noted. Submissions outline concerns regarding reliance on public transport projects that are not yet funded or committed, the phasing of the Luas extension, Bus Connects and road infrastructure and that homes could be occupied before public transport is in place and that there would be potential for severe traffic congestion in early phases as a result. Submissions request the delivery of public transport including the Dart+ West and Luas, before or in tandem with housing, the completion of strategic roads including the Southern Link Road, and the Cappagh Road–Dunsink Lane link and orbital routes in advance of major development. Reference is made to assessing station capacity and improvements in this regard before residential units are occupied. Submissions also request for there to be traffic monitoring during each phase of development, traffic thresholds and mitigation measures published and ongoing coordination with transport agencies. It is requested that existing transport bottlenecks, especially at the Navan Road and Ashtown Road junction, are addressed before significant additional housing is occupied. It is also requested that traffic calming and active travel improvements for existing communities are delivered on the same timescale as those proposed for new Dunsink neighbourhoods. A submission welcomes the phasing in respect of the Luas Tyrrelstown extension in terms of permitted the first 2 phases of the development of the area prior to delivery of the project.

Stronger commitments on funding and delivery timelines for Luas, DART+ West and bus services are requested. A submission notes that the Draft Plan also states that junctions along Ratoath Road, in the Dublin City Council area, will need to be upgraded for extra capacity, without any detail on design, land take or Dublin City Council's agreement. A submission states that the plan phasing places emphasis of delivering the highest density elements during the early phases and appears to prioritise taller apartment buildings before many of the community facilities and neighbourhood amenities have been provided.

A number of submissions referred to community and social infrastructure in terms of phasing. Many submissions expressed concerns that existing schools and healthcare services in Finglas, Ashtown, Cabra and surrounding areas would have to absorb additional demand for places/services in the early phases of development. Submissions requested variously that an education delivery strategy be developed, that school sites should be reserved and delivered early and that schools should open before or in tandem with housing delivery. It was also requested that childcare places should be expressed in places per household and secured in the first phase of development. It is proposed that funding for at least 1 no. secondary school should be confirmed before Phase 1 residential units are occupied. Submissions state that pre school provision should be made in each phase. It is stated in a submission that the plan does not clearly set out the number of primary and post primary schools proposed, the capacity of individual schools, timing of delivery of each school and opening thresholds. It is requested that an 'Education Delivery Strategy' be published for Dunsink in conjunction with the Department of Education.

It is stated that early and funded healthcare provision should be agreed with the Health Services Executive. It is stated that community centres should be delivered early and community infrastructure should be phased alongside population growth.

A submission stated that active street frontages, local services and neighbourhood amenities including shops and postal services should be developed concurrently with housing.

It is also stated in submissions that parks and recreation facilities and playing pitches should be provided from the first phase of development, with sports infrastructure targets, public access agreements and consultation with local clubs and sports organisations.

One submission states that the requirement for the delivery of the first phase of the Regional Park, together with active travel linkages from Phase 1 sites through the Regional Park towards Cappagh Road, Cappagh Hospital and the Dunsoghly area is outside of the control of the landowner in question and exceeds what is necessary to support the initial phase of development. The submission considers these measures to premature and raises concerns that the provision of pedestrian and cycle links in advance of surrounding development could result in isolated and unsupervised routes, potentially contributing to anti-social behaviour.

Some submissions request further details in respect of the evidence base and requirement for social infrastructure. The publication of projected population figures for

each phase is requested. Service capacity audits and studies assessing school, childcare, healthcare and transport demand are requested in addition to evidence demonstrating how infrastructure will meet projected demand. It is suggested that this be carried out jointly with Dublin City Council.

Chief Executive's Response

Fingal County Council recognise the importance that phasing will play in ensuring that Dunsink will develop in a coordinated and sustainable manner. The comments made highlighting a lack of capacity in services in the wider area and precedent development areas are noted.

The Draft Plan promotes an infrastructure led approach to population growth, identifying the key infrastructural requirements necessary to sustain certain thresholds in housing provision. The phasing and implementation section of the Draft UAP seeks to provide community infrastructure, such as schools and open space, in each phase of development and states, as referred to in many of the submissions received, that "development will be phased to ensure that the infrastructure required for a given level of development is provided in tandem, or in advance of development".

In addition, Objective POD0 of the Draft Plan requires that:

"All Planning applications for residential development shall clearly set out a phasing programme as part of the application. This shall set out how the objectives of the phasing strategy, as relevant and applicable to the overall proposal for development, will be achieved in addition to illustrating a clear understanding of how each phase of the development is to be completed including infrastructural requirements prior to the commencement of the next phase of development".

Each phase of development is required to provide community/culture facilities at a scale appropriate to the overall scale, mix and nature of development proposed and in line with the requirements of the Fingal Development Plan. Within the mixed use employment and residential areas, development proposals must include a land use mix with at least 15% employment/ commercial/ community /cultural uses. This requirement will ensure that the area will not develop solely on a residential basis and that active street frontage, local services and neighbourhood amenities will be developed concurrently with homes. The requirement of the Draft Plan that infrastructure is provided in tandem with or in advance of development and the above objective will provide a means to ensure that adequate infrastructure is in place to serve the new community in this area.

The transport strategy for the Draft Plan which informs the phasing strategy has identified the infrastructure necessary to support a given number of units. It is therefore not a requirement to deliver some transport proposals in the first phase such as the Southern Link Road, Cappagh Road-Dunsink Lane link, orbital routes or the Luas in the first phase. Dart+ West is a permitted project, having been granted a railway order and is currently progressing through the development process. The UAP provides the overall strategy transport framework. However, it should also be noted that individual development proposals will have to be accompanied by a traffic and transport assessment where new development is likely to have a significant impact on travel demand and the capacity of the surrounding transport network. This is currently the policy of the Fingal County Development Plan and allows for the specifics of a given proposal to be assessed further.

The delivery of traffic calming and active travel improvements for existing communities or transport proposals not required to support the development of the Plan lands is outside the remit of the Urban Area Plan.

The support expressed for the Draft Plan phasing with respect to the Luas Tyrrelstown extension is noted.

The request regarding the text in Chapter 13 stating “Infrastructure requirements set out here are indicative and will be determined on a case-by-case basis” be removed from the Plan is noted. The text in question is intended to reflect that circumstances may change over the long-term implementation of the Plan and enable those circumstances to be addressed. This is referenced in Section 13.2 of the Draft Plan which states:

“Deviations from the phasing strategy may be considered on a case-by-case basis, and agreed to the satisfaction of the Planning Authority, to allow for unforeseen circumstances beyond the reasonable control of an individual developer or the Local Authority. Deviations may comprise viable alternatives or interim measures that accord with the overall objectives of the Plan. Any interim proposals must ensure and maintain consistency with the buildout or ‘long-term’ infrastructure objectives of the Plan.”

The Draft Plan is clear that the development of these lands must occur in an integrated and coordinated manner, providing the necessary infrastructure, particularly social infrastructure to serve the new community.

The phasing strategy for the Draft Plan does not propose to deliver the highest density and taller buildings during the early phase of development. Lands in the Dunsink East and Dunsink Central Development Areas, which include the lands identified for Phase 1,

are subject to the lowest density range in the Plan. The tallest buildings are proposed to be located in the Western Development Area, which also is the densest development area. This area would be developed as Phase 3, the last phase.

The capacity of individual schools, delivery timescale and funding are within the remit of the Department of Education and Youth. The Draft Plan has made provision for 10 no. school sites: 6 no. primary schools and 4 no. post primary schools. The phasing strategy sets out the timing for the transfer of school sites to the Department of Education and Youth. It is noted that the submission received from the Department of Education and Youth also states that the preference is to expand existing facilities (if possible) should there be a requirement for additional school places resulting from planned population increases. Fingal County Council work with the Department with regards to any future requirements in this regard for educational premises outside of the Plan area and in delivering the school sites required within the Plan lands.

The Draft Plan recognises the importance of providing childcare facilities, with Objective ICO4 requiring that these facilities are provided in line with national guidelines. The national guidelines for childcare facilities do not operate on a places per household basis but rather on the general standard of 1 facility of a minimum of 20 childcare places per 75 dwelling units. This broad standard is adjusted depending on the unit mix of a given scheme as required by the 'Design Standards for Apartments Guidelines for Planning Authorities' (2025). As set out in the phasing strategy, each phase of development is required to provide community/culture facilities at a scale appropriate to the overall scale, mix and nature of development proposed and in line with Development Plan requirements. Community facilities would include childcare facilities.

The Draft Plan recognises that delivering community infrastructure including healthcare facilities in tandem with population growth will be essential in order to create a successful mixed use urban neighbourhood. Policy IC03 of the Draft Plan is to "Ensure that social and community infrastructure requirements are identified and delivered as required alongside other associated land uses in tandem with population growth, in order to facilitate a high quality of life for future residents." Community space will be an integral part of new developments in Dunsink. Fingal County Council has delivered and operates an extensive network of community centres across the county and continues to expand and provide new space as needed. This will include the provision of new community space in Dunsink.

The Draft Plan recognises the importance of providing open space and recreational facilities in this area, from the outset of development. The Draft Plan sets out a hierarchy of open spaces which will be delivered in the area, ranging from two regional parks, a

recreational hub, a local park, small parks and pocket parks. These spaces will accommodate a variety of uses; from lower intensive passive recreational purposes in the sensitive Tolka Valley Regional Park to a recreational hub in the Dunsink Regional Park. All proposals for development will be required to deliver the open space in accordance with the standard set out in Section 7.5.5 of the Draft Plan i.e. a minimum provision of 2.5 hectares per 1,000 population. This will be required in the first applications for development which are made on these lands. In addition, delivery of the first phase of the Dunsink Regional Park, is identified as required infrastructure for Phase 1 of the development of these lands. This proposal will be developed by Fingal County Council. The development of playing pitches/facilities in the recreational hub will be subject to the preparation of a recreational plan which will examine, amongst other things, the range of activities to be accommodated in the hub and will be subject to consultation. The issue raised of delivery of the first phase of the regional park and active travel linkages from the park to adjoining areas and concerns regarding potential anti-social activity are noted. As highlighted in a number of the submissions received, it is vital that open space and recreational facilities, as a key component of a sustainable community, are delivered in tandem with housing delivery. The development of the Regional Park and recreational hub at the former landfill site will be beneficial to both the new community and existing residents of this area and is considered to represent a transformational project for this area. In order to facilitate access, particularly by active travel, and usage of the facility, it is considered vital that the network of active travel linkages is developed in tandem with Phase 1 of the park and therefore it is not proposed to amend the phasing strategy in this regard.

The requests for information on projected population figures for each phase are noted. The full build out of the development of the Dunsink UAP lands is a long-term project. The ultimate population will depend on household size which can only be estimated at this point in time. The development of the Draft Plan is based on an average household size of 2.5 persons.

Consideration has been given in the preparation of the Draft Plan of the demand for schools, childcare facilities, transport services and healthcare facilities. The transport strategy in Chapter 5 and Appendix 5 of the Draft Plan contains a detailed assessment of transport demand for the Plan lands. As set out previously, community and educational facilities, including childcare facilities, will be provided in tandem with development. Individual planning applications will have to include proposals for childcare facilities in line with national standards. Demand for educational facilities has been projected to result in a requirement for 10 no. schools and sites for these have been identified in the Draft Plan area.

Chief Executive's Recommendation

No change.

Funding and Implementation

Summary of Submissions

Multiple submissions refer to the implementation of the Plan and governance arrangements surrounding this.

Clarity is requested regarding anticipated annual dwelling completions for the Plan area.

Some submissions states that the success of Dunsink depends on the coordinated delivery of transport, utilities, healthcare, policing, parks and commercial services and request a multi-agency governance and oversight structure be established to oversee infrastructure delivery, funding, phasing and ongoing monitoring to ensure coordinated decision-making and accountability. Submissions reference the need for the organisations including NTA, TII, HSE, EirGrid, An Garda Síochána, and Iarnród Éireann to participate in such structures. Some submissions request that a formal joint transport working group with Dublin City Council, the NTA, TII and other relevant parties is established prior to the adoption of the plan.

Separately, it is requested that Fingal County Council work with Dublin City Council and other state agencies to address deficits in community infrastructure and services in the Rathbourne and wider Royal Canal Park area as an immediate priority and not as part of a new development in Dunsink.

The cross-boundary nature of the plan was identified as requiring closer co-ordination between Fingal County Council and Dublin City Council. Submissions called for engagement with Dublin City Council residents and local Elected Members to address cross boundary issues and promote a co-ordinated approach to land-use planning and the delivery of infrastructure and services in the plan lands. A co-ordinated approach was considered necessary to ensure that communities outside the plan area could form part of the plan making process in a meaningful way.

Some submissions consider that the impacts associated with the development of Dunsink will extend into Dublin City Council areas, particularly Finglas, Ashtown and Cabra. Submissions request that a formal joint Dublin City Council/Fingal County Council oversight committee under the Local Government Act be established to manage cross boundary impacts on Finglas and surrounding communities and to ensure both local authorities have shared oversight of planning, infrastructure and community impacts.

It is stated that Objective CSO31 of the Fingal County Development Plan 2023-2029 requires an infrastructural audit with costings and an implementation strategy. This information has not been provided. Members have not been told what infrastructure will cost, when it will arrive or who will pay for it. A submission states that the Draft Plan does not state how it is intended to fund an extension to the Tolka Valley Regional Park. Options such as compulsory purchase or timelines for development are not stated in Section 13.3 of the Draft Plan.

A submission states that the reliance on S48 contributions to fund regional parks would place an undue burden on private home buyers at Dunsink.

A submission welcomes the reference to the use of the county's development contribution scheme to fund infrastructure noting that there is no reference to a supplemental development contribution scheme. It is stated that any potential future funding should recognise that apartment development viability is challenging.

Ongoing consultation with affected neighbouring communities is requested.

A number of submissions refer to processes and reporting of development. Some submissions highlight concerns regarding a lack of clarity on infrastructure funding, responsibility and delivery timelines. It is requested that there is a transparent implementation programme with funding plans and cost estimates; that there is annual public reporting on progress and infrastructure delivery, biodiversity monitoring and mechanisms to pause development if infrastructure delivery falls behind.

Chief Executive's Response

It is recognised that a multi-agency approach is needed to facilitate the build out of the Plan lands, given their strategic regional importance and having regard to the role that other government and national agencies will play in infrastructure provision. Consultation has taken place with relevant organisations as part of the preparation of the Plan. Fingal County Council will continue to liaise with the relevant organisations and welcomes their involvement in the implementation of the Urban Area Plan. It is envisaged that this will occur through the existing frameworks and processes in place in the council. The establishment of committees under the Local Government Act is a separate statutory process to an Urban Area Plan and it is not considered to be within the remit of the Plan.

The Draft Plan includes a prescriptive account of the infrastructure necessary to support the development of the Plan lands. It is not possible to assess the total cost of infrastructure as that would require detailed designs for individual projects and would be affected by fluctuations in land values, construction costs and other economic variables.

In addition, there are multiple agencies involved in the delivery of such projects and many are outside the remit of Fingal County Council. Funding will therefore in many instances come from the capital programmes of other organisations, for example, Uisce Éireann in respect of the Greater Dublin Drainage and Dublin Water Supply Project, the National Transport Authority in respect of public transport, Iarnród Éireann in relation to the Dart+ West project, the Department of Educational and Youth for school developments and so forth.

The Plan has adopted an infrastructure led approach to development, specifying what infrastructure is required to support thresholds of housing units rather than detailing timelines. The use of compulsory purchase orders is a matter for consideration at the detailed design stage of a scheme.

The use of development contribution schemes under Section 48 of the Planning and Development Act 2000 as amended to fund regional parks in this area is considered reasonable given that permitted developments will benefit from those facilities. In addition to development contributions schemes, council projects will be funded through the Council's capital expenditure programme and other relevant potential funding sources, such as the Housing Infrastructure Investment Fund. Whilst not specifically referenced in the Draft Plan, the adoption of a supplemental development contribution scheme in the future remains available and may be considered at a future date should circumstances warrant. The references made to viability issues in apartment delivery are noted and acknowledged. Whilst having cognisance of this, the Draft Plan is a long term document and endeavours to provide a long term vision for this area, noting that the economic climate may change during this time.

Outside of the statutory consultation process for this Urban Area Plan, public participation will be possible through the development management process. In addition, community consultation will take place as required for specific projects.

The quantity of annual housing completions will depend on a multiple of factors including development phasing and infrastructure provision. At a policy level, it will also depend on the core strategy allocation assigned to this area in the future. The current Fingal Development Plan assigns 2,500 units to this area for the period to 2029. Future development plans will detail the allocation thereafter.

Housing delivery monitoring occurs on an ongoing basis, through Fingal County Council's contribution to the '4Dublin Housing Supply Pipeline Monitor' report, which is published on a quarterly basis. The Environmental Report which accompanied the Draft Plan also includes monitoring measures.

Chief Executive's Recommendation

No change.

3.14. Out of Scope

FIN-C973-9, FIN-C973-15, FIN-C973-17, FIN-C973-223, FIN-C973-238, FIN-C973-295, FIN-C973-332, FIN-C973-333, FIN-C973-372, FIN-C973-374, FIN-C973-437, FIN-C973-475, FIN-C973-553, FIN-C973-682, FIN-C973-688, FIN-C973-691, FIN-C973-696, FIN-C973-718, FIN-C973-723, FIN-C973-724, FIN-C973-725, FIN-C973-726, FIN-C973-727, FIN-C973-728, FIN-C973-730, FIN-C973-731, FIN-C973-733, FIN-C973-734, FIN-C973-735, FIN-C973-736, FIN-C973-738, FIN-C973-739, FIN-C973-740, FIN-C973-741, FIN-C973-742, FIN-C973-743, FIN-C973-744, FIN-C973-745, FIN-C973-746, FIN-C973-747, FIN-C973-748, FIN-C973-749, FIN-C973-750, FIN-C973-751, FIN-C973-752, FIN-C973-753, FIN-C973-756, FIN-C973-757, FIN-C973-758, FIN-C973-759, FIN-C973-760, FIN-C973-761, FIN-C973-762, FIN-C973-763, FIN-C973-764, FIN-C973-765, FIN-C973-767, FIN-C973-769, FIN-C973-770, FIN-C973-771, FIN-C973-772, FIN-C973-773, FIN-C973-774, FIN-C973-775, FIN-C973-777, FIN-C973-778, FIN-C973-779, FIN-C973-781, FIN-C973-784, FIN-C973-785, FIN-C973-786, FIN-C973-787, FIN-C973-788, FIN-C973-789, FIN-C973-790, FIN-C973-792, FIN-C973-793, FIN-C973-795, FIN-C973-796, FIN-C973-797, FIN-C973-798, FIN-C973-799, FIN-C973-800, FIN-C973-801, FIN-C973-802, FIN-C973-803, FIN-C973-804, FIN-C973-806, FIN-C973-807, FIN-C973-808, FIN-C973-809, FIN-C973-810, FIN-C973-811, FIN-C973-812, FIN-C973-813, FIN-C973-814, FIN-C973-815, FIN-C973-816, FIN-C973-818, FIN-C973-819, FIN-C973-820, FIN-C973-821, FIN-C973-822, FIN-C973-823, FIN-C973-824, FIN-C973-825, FIN-C973-826, FIN-C973-827, FIN-C973-828, FIN-C973-830, FIN-C973-831, FIN-C973-832, FIN-C973-833, FIN-C973-834, FIN-C973-835, FIN-C973-836, FIN-C973-837, FIN-C973-838, FIN-C973-839, FIN-C973-840, FIN-C973-842, FIN-C973-843, FIN-C973-844, FIN-C973-845, FIN-C973-847, FIN-C973-848, FIN-C973-849, FIN-C973-850, FIN-C973-851, FIN-C973-852, FIN-C973-853, FIN-C973-854, FIN-C973-855, FIN-C973-856, FIN-C973-857, FIN-C973-858, FIN-C973-859, FIN-C973-860, FIN-C973-861, FIN-C973-862, FIN-C973-863, FIN-C973-864, FIN-C973-865, FIN-C973-866, FIN-C973-867, FIN-C973-868, FIN-C973-869, FIN-C973-870, FIN-C973-871, FIN-C973-872, FIN-C973-873, FIN-C973-874, FIN-C973-875, FIN-C973-876, FIN-C973-877, FIN-C973-878, FIN-C973-879, FIN-C973-880, FIN-C973-881, FIN-C973-882, FIN-C973-883, FIN-C973-884, FIN-C973-886, FIN-C973-887, FIN-C973-888, FIN-C973-889, FIN-C973-890, FIN-C973-891, FIN-C973-892, FIN-C973-893, FIN-C973-894, FIN-C973-895, FIN-C973-896, FIN-C973-897, FIN-C973-899, FIN-C973-900, FIN-C973-901, FIN-C973-902, FIN-C973-903, FIN-C973-904, FIN-C973-906, FIN-C973-907, FIN-C973-908, FIN-C973-909, FIN-C973-910, FIN-C973-911, FIN-C973-913, FIN-C973-914, FIN-C973-915, FIN-C973-916, FIN-C973-918, FIN-C973-919, FIN-C973-920, FIN-C973-921, FIN-C973-922, FIN-C973-923, FIN-C973-925, FIN-C973-926, FIN-C973-927, FIN-C973-928, FIN-C973-929, FIN-C973-931, FIN-C973-933, FIN-C973-934, FIN-C973-935, FIN-C973-936, FIN-C973-937, FIN-C973-938, FIN-C973-939, FIN-C973-940, FIN-C973-941, FIN-C973-942, FIN-C973-943, FIN-C973-944, FIN-C973-945, FIN-C973-946, FIN-C973-947, FIN-C973-948, FIN-C973-949, FIN-C973-950, FIN-C973-951, FIN-C973-952, FIN-C973-953, FIN-C973-954, FIN-C973-955, FIN-C973-956, FIN-C973-957, FIN-C973-958, FIN-

C973-959, FIN-C973-960, FIN-C973-961, FIN-C973-962, FIN-C973-963, FIN-C973-964, FIN-C973-965, FIN-C973-966, FIN-C973-968, FIN-C973-969, FIN-C973-970, FIN-C973-971, FIN-C973-972, FIN-C973-973, FIN-C973-974, FIN-C973-975, FIN-C973-976, FIN-C973-977, FIN-C973-978, FIN-C973-979, FIN-C973-980, FIN-C973-981, FIN-C973-983, FIN-C973-987, FIN-C973-988, FIN-C973-989, FIN-C973-991, FIN-C973-992, FIN-C973-993, FIN-C973-994, FIN-C973-995, FIN-C973-997, FIN-C973-998, FIN-C973-999, FIN-C973-1000, FIN-C973-1002, FIN-C973-1004, FIN-C973-1005, FIN-C973-1006, FIN-C973-1007, FIN-C973-1008, FIN-C973-1009, FIN-C973-1010, FIN-C973-1011, FIN-C973-1012, FIN-C973-1013, FIN-C973-1015, FIN-C973-1016, FIN-C973-1020, FIN-C973-1021, FIN-C973-1022, FIN-C973-1023, FIN-C973-1024, FIN-C973-1025, FIN-C973-1026, FIN-C973-1027, FIN-C973-1028, FIN-C973-1029, FIN-C973-1031, FIN-C973-1032, FIN-C973-1033, FIN-C973-1034, FIN-C973-1035, FIN-C973-1036, FIN-C973-1037, FIN-C973-1038, FIN-C973-1039, FIN-C973-1041, FIN-C973-1042, FIN-C973-1044, FIN-C973-1045, FIN-C973-1046, FIN-C973-1049, FIN-C973-1050, FIN-C973-1052, FIN-C973-1053, FIN-C973-1054, FIN-C973-1058, FIN-C973-1060, FIN-C973-1061, FIN-C973-1062, FIN-C973-1063, FIN-C973-1064, FIN-C973-1067, FIN-C973-1068, FIN-C973-1070, FIN-C973-1071, FIN-C973-1072, FIN-C973-1073, FIN-C973-1075, FIN-C973-1076, FIN-C973-1078, FIN-C973-1079, FIN-C973-1080, FIN-C973-1082, FIN-C973-1083, FIN-C973-1084, FIN-C973-1088, FIN-C973-1090, FIN-C973-1091, FIN-C973-1092, FIN-C973-1093, FIN-C973-1094, FIN-C973-1095, FIN-C973-1096, FIN-C973-1098, FIN-C973-1100, FIN-C973-1101, FIN-C973-1102, FIN-C973-1103, FIN-C973-1104, FIN-C973-1105, FIN-C973-1106, FIN-C973-1108, FIN-C973-1109, FIN-C973-1110, FIN-C973-1112, FIN-C973-1113, FIN-C973-1114, FIN-C973-1115, FIN-C973-1116, FIN-C973-1117, FIN-C973-1118, FIN-C973-1119, FIN-C973-1120, FIN-C973-1121, FIN-C973-1122, FIN-C973-1124, FIN-C973-1126, FIN-C973-1127, FIN-C973-1129, FIN-C973-1130, FIN-C973-1131, FIN-C973-1132, FIN-C973-1133, FIN-C973-1134, FIN-C973-1135, FIN-C973-1136, FIN-C973-1137, FIN-C973-1140, FIN-C973-1141, FIN-C973-1143, FIN-C973-1144, FIN-C973-1145, FIN-C973-1147, FIN-C973-1148, FIN-C973-1149, FIN-C973-1151, FIN-C973-1152, FIN-C973-1153, FIN-C973-1154, FIN-C973-1156, FIN-C973-1159, FIN-C973-1160, FIN-C973-1162, FIN-C973-1163, FIN-C973-1164.

Summary of Submissions

A number of submissions raise concerns regarding existing anti-social behaviour and socio-economic challenges within the area. These submissions express concern that additional residential development could exacerbate existing issues and place further pressure on local communities. Related submissions contend that policing and community services are currently under-resourced and should be enhanced to support future growth. A small number of submissions characterise the proposed development as a potential social hazard and emphasise the need for appropriate social and community infrastructure.

A number of submissions seek changes to land use zonings or propose the inclusion of additional lands beyond the Draft UAP boundary. These include requests to extend the Plan area south of Navan Road Parkway Station; rezone lands adjacent to existing rail

stations for residential, mixed-use or employment development; change the zoning of lands near Navan Road Parkway Station from High Technology to Metro and Rail Economic Corridor; and remove development zoning from an area of wetland east of the station. Submissions generally argue that lands in close proximity to existing public transport infrastructure should be prioritised for development in accordance with the principles of sustainable and transit-oriented development.

Other submissions raise matters, including a proposal for a new DART connection linking Dunsink, Dublin Airport and the Dublin-Sligo and Dublin-Belfast rail lines; concerns regarding existing service deficits in nearby developments such as Rathborne; a request for a schedule of works within the Dublin City Council administrative area; and queries regarding the sequencing of the Draft UAP relative to existing uncommenced planning permissions elsewhere in Fingal.

Some submissions also address matters beyond the remit of the Draft UAP, including requests for information relating to previous consultation processes, and commentary on national immigration.

The submission from the Health and Safety Authority (HSA) advises that the Local Authority should have regard to the Authority's approach to land use planning as set out in the document 'Guidance on Technical Land-Use Planning Advice' and identifies a number of establishments in the Dublin 15 area that may be relevant in this regard.

A separate submission refers to the HSA submission and requests confirmation as to whether any of the proposed residential development areas within the Draft Plan fall within the consultation distances associated with the establishments. The submission further requests that any maps or site-specific advice provided by the HSA during the consultation process be published.

Chief Executive's Response

An Urban Area Plan must be materially consistent with the zoning objectives and strategic policies of the Fingal Development Plan 2023-2029 and cannot be used to alter Development Plan zoning objectives or rezone lands outside the Plan boundary. Requests to extend the Plan area, amend zoning objectives, or consider the future development of lands adjoining the Plan area are therefore outside the scope of the Draft Dunsink Urban Area Plan and would more appropriately be considered through a future Development Plan process.

The Draft UAP has been prepared having regard to the principles of sustainable development, compact growth and the delivery of supporting physical, social and

community infrastructure. The provision of community facilities, social infrastructure and services is addressed throughout the Plan, including within Chapter 9: Inclusive Communities. Matters relating to policing resources, community safety initiatives and the operational responsibilities of An Garda Síochána and other service providers fall outside the remit of the Urban Area Plan. The Council's response to submissions relating to community facilities and future service provision is set out in Section 3.10 Community Infrastructure and Services of this report.

The Draft UAP is also not the appropriate mechanism to consider matters relating to requested transport projects outside those identified in adopted national, regional and local policy, national immigration policy, general Council administration, or matters directed towards Government Departments, statutory agencies or the Office of the Planning Regulator.

Concerns regarding existing service provision in nearby communities, the sequencing of development, requests for schedules of works within the Dublin City Council administrative area, and queries relating to previous consultation processes are noted. However, these matters are either outside the scope of the Draft UAP or will be addressed through the implementation of the Plan, future development management processes and the ongoing coordination of relevant Council departments and statutory agencies.

The HSA's guidance document relating to the technical land use planning advice requirements under the Seveso III Directive is noted. None of the consultation distances associated with the sites in question extend into the Plan lands. Fingal County Council will continue to consult and liaise with the Health and Safety Authority, as a prescribed body, through the development management process, as required.

The Draft Plan has been prepared having regard to relevant health and safety considerations, including the requirements of the Seveso III Directive and the guidance issued by the Health and Safety Authority. The consultations distances for the sites do not extend into the Plan lands. Fingal County Council will continue to consult and liaise with the Health and Safety Authority, as a prescribed body, through the development management process as required.

Chief Executive's Recommendation

No change.

3.15. Appendix 1 SEA Environmental Report

FIN-C973-68, FIN-C973-77, FIN-C973-216, FIN-C973-232, FIN-C973-238, FIN-C973-537, FIN-C973-577, FIN-C973-612, FIN-C973-696, FIN-C973-712.

Summary of Submissions

Some submissions raise concerns regarding the quality, consistency and robustness of the Strategic Environmental Assessment (SEA) Environmental Report. Issues identified include potential inconsistencies within the documentation, queries regarding the application of the assessment methodology, and concerns that elements of the report may not have been sufficiently tailored to the Dunsink Urban Area Plan.

Submissions request that the SEA documentation be reviewed to ensure accuracy, internal consistency and alignment with the Plan. Clarification is also sought in relation to aspects of the assessment methodology, including the selection of environmental receptors and designated sites considered within the assessment, the application of screening criteria, and the basis for certain assessment conclusions.

Some submissions further question whether sufficient evidence has been provided to support elements of the assessment, particularly in relation to infrastructure and transport capacity. Concerns are also raised regarding document presentation, cross-referencing and quality assurance. Accordingly, a number of submissions request that the SEA documentation be comprehensively reviewed and amended, where necessary, prior to adoption of the Plan.

A number of submissions contend that cumulative environmental impacts have not been adequately assessed and that greater weight should be given to biodiversity protection, habitat connectivity and green infrastructure. Particular concerns relate to the River Tolka corridor, Scribblestown Stream, Tolka Valley Park and the wider ecological network. It is stated that proposed infrastructure works, including the widening of Scribblestown Lane, could result in habitat loss, fragmentation of wildlife corridors, removal of established hedgerows and adverse impacts on biodiversity. Submissions reference the presence of a range of fauna and protected species within the area, including bats, otters, badgers, birds, fish and amphibians, and emphasise the ecological importance of these habitats.

Submissions also request that wildlife surveys and ecological monitoring be undertaken at appropriate times of year and under the supervision of qualified ecologists prior to the commencement of development. Additional concerns are raised regarding potential increases in air pollution, noise and environmental disturbance arising from future traffic

and development activity. One submission also references EPA mapping which identifies pockets of elevated radon potential within parts of the Plan area.

Submissions from statutory environmental bodies provide recommendations and guidance in relation to environmental assessment processes. The Department of Climate, Energy and the Environment (Geological Survey Ireland) recommends the use of its online resources in relation to SEA, Environmental Impact Assessment Report (EIAR) preparation and planning processes, and requests that the results of any future site investigations be submitted to its national database.

The Environmental Protection Agency (EPA) provides guidance on SEA processes, monitoring requirements, the assessment of alternatives and the preparation of the SEA Statement. The EPA also highlights the importance of ensuring alignment with relevant national and regional planning policy and advises that mitigation measures identified through the SEA process should be reflected in the final Plan.

The Heritage Council recommends that the strategic environmental objectives as set out in Table 6.1 of the environmental report should have the potential OUV of the tentative UNESCO site as a key objective, under the cultural heritage heading.

One submission supports the preferred development strategy identified as Alternative 1 within the SEA, namely the development of the lands primarily for residential purposes, and supports the precautionary approach adopted within the Environmental Report.

One submission states that under the European Union (Land Use Planning - Strategic Environmental Assessment) Regulations 2025, Fingal County Council must ensure that environmental risks are fully mitigated before development proceeds. The submission contends that the Draft Plan area is constrained by a former landfill, areas of flood risk, transport challenge, delayed infrastructure delivery and concerns regarding emergency access. It is argued that, in light of these issues, the Draft Plan does not align with the spirit or intent of the SEA Regulations.

A number of submissions raise concerns regarding the assessment of alternatives within the SEA. In particular, it is argued that the SEA does not adequately assess alternative scenarios relating to the timing of the proposed Luas extension in relation to the phased development of Dunsink. It is contended that the environmental implications of different delivery scenarios, including early delivery of the Luas relative to development phases, should be assessed and compared. Concerns are also raised that a lack of clarity regarding the proposed timing of Luas delivery undermines the assessment of the Plan's environmental effects.

One submission states that the density proposed fails to adequately respect the SEA baselines. The submission requests enforceable environmental buffer zones horizontally and vertically to protect existing biodiversity.

Finally, submissions refer to previous planning processes and environmental assessments within the wider area and request that future development proposals fully consider cumulative impacts on biodiversity, protected species, water quality, flood risk, wastewater infrastructure, habitat connectivity and cultural heritage.

Chief Executive's Response

The Strategic Environmental Assessment (SEA) Environmental Report was prepared in accordance with the requirements of the Planning and Development Act 2024 as amended, the SEA Regulations and relevant EPA guidance. The environmental assessment process formed an integral part of the preparation of the Draft Dunsink Urban Area Plan and considered the likely significant environmental effects arising from implementation of the Plan.

The concerns raised in relation to the accuracy, consistency and quality assurance of the Environmental Report are noted. The SEA Environmental Report will be reviewed prior to the finalisation of the Plan and any typographical errors, drafting inconsistencies, cross-referencing issues, figure and table numbering anomalies, and other editorial matters identified through the submissions process will be corrected where necessary. This includes review of references cited within the report, including the heading of Section 8.2 and other identified formatting and numbering issues, to ensure that the document accurately reflects the Dunsink Urban Area Plan and is internally consistent.

The concerns regarding the inclusion of European sites beyond the stated 15km screening distance are noted. The Appropriate Assessment and SEA documentation will be reviewed and amended where necessary to provide additional clarity regarding the methodology applied, the rationale for the inclusion of individual sites, and the screening approach adopted.

Concerns relating to the use of generic assessment language and the adequacy of objective-specific environmental assessment are also noted. The SEA process assessed the strategic objectives and policies of the Draft Plan having regard to the environmental baseline, environmental sensitivities and Strategic Environmental Objectives identified for the area. The assessment methodology is consistent with SEA guidance and will be reviewed further as part of the finalisation process.

In relation to transport, utilities and infrastructure capacity, the Environmental Report was informed by a range of supporting technical studies prepared alongside the Draft Plan, including transport modelling and infrastructure assessments. These documents informed the conclusions of the SEA and the overall plan-making process.

The submissions raising concerns regarding cumulative impacts, biodiversity, habitat connectivity, green infrastructure and ecological protection are noted. The Draft UAP has been prepared with sustainability, climate resilience and biodiversity enhancement as central principles. The Plan includes a comprehensive suite of Green Infrastructure objectives, including Objectives GI01-GI04, which seek to protect and enhance ecological networks, biodiversity resources, habitat connectivity and the River Tolka and Scribblestown Stream corridors.

Any future development proposals arising from the Plan will be required to comply with all relevant environmental legislation and will be subject to Appropriate Assessment Screening, Environmental Impact Assessment Screening and the preparation of Natura Impact Statements and/or Environmental Impact Assessment Reports, where required. Detailed ecological surveys, environmental assessments and mitigation measures will be required at project level, as appropriate. Construction Environmental Management Plans will also be required and will address matters such as biodiversity protection, water quality, noise, air quality, lighting and other environmental considerations.

With regard to concerns relating to hedgerows, wildlife corridors and protected species, the Plan seeks to retain, protect and enhance existing biodiversity wherever feasible. Any proposed interventions affecting ecological features will be subject to detailed assessment by qualified ecologists and will be required to demonstrate compliance with the policies and objectives of the UAP and the Fingal Development Plan.

The concerns regarding landfill remediation, flood risk, transport constraints, utilities infrastructure, emergency access and environmental risk are noted. Future development proposals will be required to demonstrate compliance with all relevant environmental, engineering and regulatory requirements. In relation to the former Dunsink Landfill, remediation works continue under the oversight of the Environmental Protection Agency and shall continue in accordance with all relevant legislative and licensing requirements.

The submissions seeking further assessment of alternatives, including alternative phasing scenarios linked to the delivery of the proposed Luas extension, are noted. The alternatives assessed through the SEA process were developed by the Plan-making team as reasonable and realistic strategic alternatives for the area and satisfy the requirements of the SEA process. The Draft UAP provides for a range of sustainable transport measures,

including active travel and public transport infrastructure. Early phases of development are not dependent on the delivery of the proposed Luas extension.

The recommendations made by statutory environmental bodies, including the Environmental Protection Agency, the Department of Climate, Energy and the Environment (Geological Survey Ireland), and the Heritage Council, are welcomed and have been carefully considered. The recommendations relating to SEA monitoring, mitigation, environmental assessment processes, geological information resources and cultural heritage will be taken into account in the finalisation of the Environmental Report and associated environmental documentation, where appropriate.

The submissions supporting the SEA approach and the preferred development strategy are noted.

It is considered that the SEA Environmental Report, together with the accompanying environmental assessments, provides an appropriate framework for assessing the likely environmental effects of the Draft Dunsink Urban Area Plan. The environmental documentation will be reviewed and updated where necessary in light of submissions received prior to the finalisation of the Plan

Chief Executive's Recommendation

No change. The Environmental Report will be amended as required at the outcome of the process.

3.16. Appendix 2 Appropriate Assessment Screening and Natura Impact Report

FIN-C973-68, FIN-C973-216, FIN-C973-238, FIN-C973-241, FIN-C973-709.

Summary of Submissions

Some submissions raise concerns regarding the accuracy, consistency and robustness of the Appropriate Assessment Screening and Natura Impact Report. Issues identified include apparent discrepancies in document formatting, numbering and cross-referencing, as well as concerns regarding the application of the assessment methodology and the adequacy of supporting evidence for certain conclusions.

Submissions also question aspects of the baseline ecological information and the extent to which potential pathways for effects on European sites have been assessed and documented. Concerns are raised regarding whether sufficient information has been provided to support certain screening and assessment conclusions, particularly in relation to ecological receptors, environmental pathways and potential effects.

In addition, some submissions consider that the mitigation measures relied upon within the assessment are not sufficiently specific to the European sites assessed and request further detail regarding the basis on which the effectiveness of mitigation has been determined.

Several submissions request that the Appropriate Assessment documentation be subject to a comprehensive review to ensure that conclusions are fully supported, methodologies are clearly explained, and the documents are internally consistent and accurate prior to adoption of the Plan.

A submission states that local biodiversity surveys have identified a range of protected and notable species within and around the Dunsink area, including bat species protected under the EU Habitats Directive, a variety of bird species, otters, badgers, pine martens and other mammals. It also highlights the presence of mature trees with ecological value, protected plant species, and the importance of the River Tolka corridor as a habitat for a range of wildlife. The submission expresses concern that increased traffic, noise, habitat loss and habitat fragmentation associated with future development could adversely affect these ecological resources and protected species. It requests that a comprehensive Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) be prepared prior to development.

One submission notes that a plan-level AA/NIR does not substitute for project level screening of the proposed widening of the bridge on Dunsinea Lane over the River Tolka and requests that the Council confirms that a separate, project-level AA screening (and NIR if required) will be carried out specifically for the Dunsinea Lane bridge widening works rather than relying on the plan-level conclusion.

Chief Executive's Response

The Appropriate Assessment (AA) Screening Report and Natura Impact Report were prepared in accordance with the requirements of the Habitats Directive and relevant guidance and assessed the potential for likely significant effects on European sites arising from implementation of the Draft Dunsink Urban Area Plan.

The concerns raised regarding the accuracy, consistency and robustness of the AA documentation are acknowledged. The AA Screening Report and Natura Impact Report will be reviewed prior to finalisation of the Plan and any identified typographical, formatting, referencing, numbering or editorial issues will be corrected as necessary to ensure clarity and consistency throughout the documentation.

With regard to concerns relating to assessment methodology, baseline ecological information, environmental pathways and the evidential basis for certain conclusions, it

is noted that the assessment is in accordance with relevant legislative and methodological requirements. The AA documentation will be reviewed, where necessary, to ensure that assessment methodologies, supporting information and the rationale underpinning conclusions are clearly presented and explained.

The concerns regarding the mitigation measures contained within the Natura Impact Report are also noted. The mitigation measures identified have been informed by the conservation objectives of the relevant European sites and are supported by the biodiversity, green infrastructure, water quality and environmental protection policies and objectives contained within the Fingal Development Plan and the Draft UAP. The documentation will be reviewed and refined, where appropriate, to provide additional clarity regarding the operation and effectiveness of mitigation measures.

The submissions relating to biodiversity, protected species, habitat connectivity and the ecological value of the Dunsink lands are noted. The Draft UAP includes a range of objectives to protect, enhance and restore biodiversity, ecological networks and green infrastructure throughout the Plan area. Particular emphasis is placed on the protection and enhancement of the River Tolka corridor, Scribblestown Stream corridor and associated ecological resources. In addition, the Draft UAP requires development proposals to contribute to biodiversity enhancement and demonstrate compliance with all relevant environmental protection requirements.

The concerns raised regarding the accuracy, and consistency of the AA documentation are acknowledged. The AA Screening Report and Natura Impact Report will be reviewed prior to finalisation of the Plan and any identified typographical, formatting, referencing, numbering or editorial issues will be corrected as necessary to ensure clarity and consistency throughout the documentation.

With regard to concerns relating to assessment methodology, baseline ecological information, environmental pathways and the evidential basis for certain conclusions, it is noted that the assessment is in accordance with relevant legislative and methodological requirements. The AA documentation will be reviewed, where necessary, to ensure that assessment methodologies, supporting information and the rationale underpinning conclusions are clearly presented and explained.

The concerns regarding the mitigation measures contained within the Natura Impact Report are also noted. The mitigation measures identified have been informed by the conservation objectives of the relevant European sites and are supported by the biodiversity, green infrastructure, water quality and environmental protection policies and objectives contained within the Fingal Development Plan and the Draft UAP. The

documentation will be reviewed and refined, where appropriate, to provide additional clarity regarding the operation and effectiveness of mitigation measures.

The submissions relating to biodiversity, protected species, habitat connectivity and the ecological value of the Dunsink lands are noted. The Draft UAP includes a range of objectives to protect, enhance and restore biodiversity, ecological networks and green infrastructure throughout the Plan area. Particular emphasis is placed on the protection and enhancement of the River Tolka corridor, Scribblestown Stream corridor and associated ecological resources. In addition, the Draft UAP requires development proposals to contribute to biodiversity enhancement and demonstrate compliance with all relevant environmental protection requirements.

It is also noted that the AA process undertaken as part of the Draft UAP is strategic and plan-led in nature. The adoption of the Plan does not remove the requirement for project-level environmental assessment. Any future development proposals or infrastructure projects arising from the implementation of the Plan will be subject to all relevant statutory environmental assessment requirements, including Appropriate Assessment Screening and, where necessary, the preparation of a Natura Impact Statement. Further ecological surveys and assessments may also be required at project level where deemed necessary by the competent authority.

It should be noted that the Fingal Development Plan contains policies and objectives which promote biodiversity protection and biodiversity net gain. In addition, Objective GI05 of the Draft UAP requires development proposals to contribute to measurable biodiversity net gain through habitat creation, ecological enhancement and species support measures. Objectives GI01-GI04 further seek to protect and strengthen ecological networks, habitat connectivity and green infrastructure throughout the Plan area.

The Draft UAP seeks to enhance accessibility and amenity along the River Tolka while ensuring the protection and enhancement of the river corridor and its associated ecological value. Any future development proposals affecting ecological receptors, including protected species and habitats, will be required to demonstrate compliance with the environmental protection objectives of the UAP, the Fingal Development Plan and relevant national and European legislation.

The submission regarding the proposed widening of the Dunsinea Lane bridge is noted. The Appropriate Assessment undertaken as part of the Draft UAP is strategic and plan-level in nature. Any future bridge widening proposal or other infrastructure project arising from the implementation of the Plan will be subject to separate project-level

environmental assessment requirements, including Appropriate Assessment Screening and, where necessary, the preparation of a Natura Impact Statement. Additional ecological surveys relating to mammals, birds, bats and other ecological receptors may be required as part of those assessments.

It is considered that the AA Screening Report and Natura Impact Report provide an appropriate assessment of the potential effects of the Draft Dunsink Urban Area Plan on European sites. The environmental documentation will be reviewed and updated where necessary in light of submissions received prior to the finalisation of the Plan.

The comments received are noted. As required by Section 205 of the Planning and Development Act 2024 as amended, the Planning Authority is required to undertake an Appropriate Assessment of the Urban Area Plan. This process includes consideration of all submissions received in respect of the Natura Impact Report. It is considered that the AA Screening Report and Natura Impact Report provide an appropriate assessment of the potential effects of the Draft Dunsink Urban Area Plan on European sites. Notwithstanding this, both documents will be reviewed and updated, where necessary, having regard to the issues raised in submissions and as part of the finalisation of the Plan.

Chief Executive's Recommendation

No change. The comments received will be taken into account when the Appropriate Assessment is carried out for the Plan.

3.17. Appendix 3 Strategic Flood Risk Assessment

FIN-C973-68, FIN-C973-218, FIN-C973-231, FIN-C973-238, FIN-C973-278, FIN-C973-287, FIN-C973-317, FIN-C973-375, FIN-C973-475, FIN-C973-516, FIN-C973-517, FIN-C973-612, FIN-C973-687, FIN-C973-701, FIN-C973-712, FIN-C973-768, FIN-C973-841, FIN-C973-924, FIN-C973-926, FIN-C973-1146.

Summary of Submissions

The OPW submission is generally supportive of the Draft Dunsink Urban Area Plan from a flood risk perspective. The OPW welcomes the flood modelling, the application of flood risk management principles, and the Sustainable Drainage Strategy, while highlighting the ongoing review of River Tolka flood mapping and reminding the Council of statutory requirements relating to watercourse crossings.

A number of submissions raise technical concerns about the SFRA. In particular they argue that the climate change scenario applied to 'highly vulnerable' development is not

consistent with the approach set out in the Council's own policy. They contend that the assessment applies a lower climate change standard than the policy requires.

Submissions also note omissions in the analysis of flood risk and state that a flood risk source identified in the Report is never assessed.

A number of submissions state that pluvial / surface water flood risk is screened out by narrative reasoning rather than assessment.

Submissions state that the Scribblestown Stream flood zone has not been independently assessed.

The submission requests specific ecological assessment for Scribblestown stream and lands immediately south of Elmgreen Golf Course in terms of flooding and wildlife. The submission requires confirmation prior to adoption of the plan whether the inclusion of floodplain land at the western and eastern ends of the Tolka River Valley for residential development is a mapping error and if not to publish ecological justification for developing this land.

Submissions question the independence of flood modelling and express uncertainty as to whether the document represents the final version relied upon by Fingal County Council.

A submission states that, based on Fingal County Council's own management plans, this project would drastically affect the Flood Attenuation (Arterial Drainage and Flood Relief Schemes and National Flood Forecasting and Warning Service, which should have been completed for the Tolka by 2021. The effect of building in the Dunsink area is queried.

Similarly, it is asked how the planned building will affect the flood plain through limiting the flow of water and speeding up the flow of water drastically changing the composition of the river.

A submission identifies concerns regarding flooding concerns, as it is stated that the park beside Scribblestown Lane has experienced flooding on numerous occasions.

A submission states that the widening of Dunsinea Lane would require the extending or replacement of a historic bridge over the River Tolka. It further notes that the bridge experiences localised flooding and to widen it would disrupt water flow and increase the flood risk upstream and downstream.

A submission references flooding having occurred below the National Observatory at Dunsink and notes similar issues with surface water in the former Rathbourne Candle Factory and in the buildings owned by Teagasc adjacent to the factory. It outlines concerns that there will be less percolation through the soil given that ground will now be covered by concrete and tarmacadam.

Reference is made to the 'Document Control' table in the SFRA and querying the status of the document.

Chief Executive's Response

It is acknowledged that there is an error in Table 7.1 of the SFRA with details the minimum design level requirements for fluvial flooding. The 'MRFS' in the first row of Table 7.1 should be replaced with 'HEFS' as per the Fingal County Development Plan 2023-2029 Strategic Flood Risk Assessment. It is recommended that this is changed.

With regards to flooding concerns beside Scribblestown Lane, the SFRA has considered past flood events and predicted flooding.

Submissions refer to a flood risk source identified in the Report as never having been assessed. This applies to Section 2.4 and Figure 2.4 of the SFRA. The text in question states "Flood risk from identified open water features is considered subsequently in the report." This text is intended to relate to Figure 2.4, which is below the text in question and illustrates watercourses in/adjoining the Plan area, i.e. the River Tolka, Scribblestown Stream, Royal Canal. Other features are not 'identified' and those in the northern portion of the Plan Area are associated with the landfill and therefore are not fluvial so are not considered further as part of the SFRA. The watercourses on the landfill have not been included in the assessment as there will be no development in this area. Any potential pollution risk from the landfill will be considered as part of landfill transformation. In this regard, reference should also be made to Section 3.6 of this report under the heading Landfill Aftercare which addresses submissions in respect of landfill management. It is recommended that the SFRA is amended to clarify this.

The SFRA adopts a standard approach to assessment of surface water flood risk. A strategic assessment does not automatically require hydraulic pluvial modelling as by its nature, a SFRA is strategic only. Site specific FRAs will be needed where the proposed development is in a flood zone or an area which Fingal County Council considers there is a potential risk of flooding. This is addressed on a county wide basis in the Fingal County Development Plan 2023-2029, for example, Objectives IUO16 and DMSO212 which state the following:

"Have regard to the OPW Flood Risk Management Guidelines 2009, as revised by Circular PL 2/2014, when assessing planning applications and in the preparation of statutory and non-statutory plans and to require site specific flood risk assessments to be considered for all new developments within the County. All development must prepare a Stage 1 Flood Risk Analysis and if the flooding risk is not screened out, they must prepare a Site-Specific Flood Risk Assessment (SSFRA) for the development, where appropriate."

In the interests of clarity, it is considered that a similar objective should be included in the Urban Area Plan.

Any future bridge crossings would be required to obtain planning permission where flood risk assessment would be subject to consideration and would also require consent from the OPW under Section 50 of the Arterial Drainage Act 1945. The latter is specifically referenced in the submission received from the OPW on the Draft Plan which noted that there are restrictions on the construction, replacement or alteration of bridges and culverts over any watercourse and that appropriate consent is required from the OPW.

The SFRA is a strategic document addressing flood risk on an area wide basis and has included consideration of flood risk associated with the Scribblestown Stream and River Tolka. Figure 3.2 of the SEA Scoping Report is a conceptual diagram, not drawn to scale. The area to the north of the Tolka River is zoned 'High Amenity' in the Fingal County Development Plan 2023-2029. The Draft UAP is consistent with these zonings. For the purposes of clarification, no changes in zoning are proposed in the Draft UAP.

The data in respect of the Scribblestown Stream flood zone was obtained from previous work commissioned by Fingal County Council for a 'Feasibility Study' on the Dunsink lands which was completed in 2022. This is referred to in Section 4.3.3 of the SFRA and the report is available on the website of Fingal County Council ¹ and includes information on the Scribblestown stream modelling inputs. Fingal County Council are satisfied that the modelling and hydraulics in the study are robust.

Submissions refer to the same consultancy firm having prepared the county wide strategic flood risk assessment and the flood risk assessment for the Draft Dunsink UAP with the view being expressed that the same consultant is validating its own county-wide and site-specific flood mapping. The SFRA for both plans have been carried out in accordance with the requirements of 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' (2009) and have been/are being subject to public consultation and review including by Fingal County Council itself and the OPW.

¹ The Dunsink Lands 'Feasibility Study' (2022) can be accessed at the following link: <https://www.fingal.ie/sites/default/files/2022-04/dunsink-feasibility-study.pdf>

The 'Revision History' section of the SFRA refers to company internal processes. The document was placed on public display with the Draft UAP and represents the formal document for this purpose. The 'Revision History' can be amended in line with the finalisation of the UAP.

Chief Executive's Recommendation

The following amendments are recommended:

Amend Table 7.1 to read as follows:

Highly Vulnerable	Greater of: • 0.1% AEP (present day / Flood Zone B) flood level + 500 mm freeboard • 0.1% AEP MRES HEFS CC flood level + 250 mm freeboard
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Amend Section 2.4 as follows:

The Royal Canal is situated between the River Tolka and southern boundary of the Plan Area. ~~A number of open water features associated with the Dunsink landfill are located in the northern portion of the Plan Area.~~

Flood risk from identified open water features is considered subsequently in the report. **It is noted that a number of 'artificial' / controlled open water features associated with the Dunsink landfill are located in the northern portion of the Plan Area but are not considered a source of fluvial flooding and as such, do not form part of this assessment.**

Amend Section 6.6 to include a new objective as follows (numbering to be in sequence)

"Have regard to the OPW Flood Risk Management Guidelines 2009, as revised by Circular PL 2/2014, when assessing planning applications and to require commensurate site specific flood risk assessments to be considered for all new developments within the Plan area. All development must prepare a Stage 1 Flood Risk Analysis and if the flooding risk is not screened out, they must prepare a Site-Specific Flood Risk Assessment (SSFRA) for the development, where appropriate."

3.18. Appendix 4 Sustainable Drainage Strategy

FIN-C973-68, FIN-C973-231, FIN-C973-375, FIN-C973-475, FIN-C973-665, FIN-C973-1146.

Summary of Submissions

The submission received from the OPW and a number of other submissions welcome the Sustainable Drainage Strategy prepared as part of the Draft Plan.

A number of submissions state that the drainage strategy applies the Mid Range Future Scenario (MRFS) uniformly, without the vulnerability-based distinction required by the companion SFRA which risks pluvial flooding downstream along Dunsinea Lane and the Tolka River basin. They recommend a move towards the OPW's higher end design standard of approximately 30% to ensure that drainage systems are designed for future climate conditions to minimise flood risks, water quality impacts and downstream effects on the Tolka catchment.

Submissions state that the drainage hierarchy relies on an infiltration assumption that is untested and internally contradicted.

Submissions state that the interaction between an infiltration-led drainage strategy and unassessed former landfill contamination is not addressed.

Submissions note a possible siting conflict between proposed SuDS storage features and mapped flood zones.

Submissions note lack of consideration of archaeological and heritage constraints. Submissions request further assessment, clarification and revision of the SDS before the Plan is adopted.

Chief Executive's Response

References are made in submissions to the application of freeboard with requirements for surface water drainage. In respect of flood risk, the High-End Future Scenario (HEFS) is required for highly vulnerable development while the Mid-Range Future Scenario is required for less vulnerable development. For surface water drainage, the Mid-Range Future Scenario is required in all instances.

This is in line with Fingal County Council policy as set out in the 'Green / Blue Infrastructure for Development Guidance Note'² and the SFRA for the Fingal County Development Plan 2023-2029. Notwithstanding this, surface water design proposals will have to comply with the prevailing statutory policy in place at the time and take account of any revised national or local guidance in this regard.

The 'Sustainable Drainage Strategy' prepared for the Draft UAP is a strategic document and does not constitute a detailed drainage design for individual development parcels. As set out in Objective SIEF06 of the Draft Plan, development proposals must be accompanied by a detailed surface water management plan. Objective SIEF09 of the Draft Plan states that "The design of surface water drainage systems shall apply a minimum 20% rainfall climate change allowance". It is considered that the wording of this objective could be amended to reflect that changes in policy documents may occur over the lifetime of the Plan and designs must comply with the prevailing policy in place at the time a proposal is being prepared.

It is acknowledged that the SDS cites superseded climate change guidance. The reference in Section 3.4.4 should be updated to the current climate change guidance.

The SDS does not assume that infiltration is feasible. Section 3.3 expressly makes infiltration subject to site investigation and infiltration testing, while Section 3.4 provides separate approaches for both infiltration-suitable and infiltration-unsuitable conditions. In particular, the indicative attenuation storage volumes (Table 3.1, Table 3.2) were calculated without any allowance for infiltration, expressly because no infiltration testing is currently available.

SDS report makes clear that infiltration is a preferred option (based on hierarchy) but does state "where infiltration is deemed unsuitable through site investigation / infiltration testing, flows will be attenuated throughout the Plan Area and final flows attenuated to the rates prescribed" in Section 3.4.

The potential contamination constraint associated with the former Dunsink landfill is identified in Table 2.2, together with the requirement for site investigation/infiltration testing. The SDS also requires groundwater risk screening where infiltration is proposed. Consideration of contamination is outside the scope of the SDS. Reference should also be made to Section 6.11 of the Draft UAP and Section 3.6 of this report under the heading Landfill Aftercare which refers to the former landfill.

² This document can be accessed at the following link: <https://www.fingal.ie/sites/default/files/2022-02/no-1-green-blue-infrastructure-guidance-document-draft-dev-plan-rev0.2-nov-2021.pdf>

In the interests of clarity, the SDS could be amended to state that infiltration SuDS shall not be adopted in areas of known or suspected contamination unless site-specific investigation and risk assessment demonstrate that infiltration would not result in unacceptable mobilisation of contaminants or risk to groundwater.

Consideration was given to fluvial floodplains and heritage features in the siting of SuDS features in the SDS. As stated in the SDS document, the SuDS masterplan is a 'concept' plan and is subject to detailed design. It is intended to inform plan-making rather than fix detailed drainage layouts. In this regard, Sections 1.2 and 4.2 of the SDS states the following:

"While any development proposal(s) for the Plan Area should carefully consider the findings and recommendations of the SDS when developing outline and detailed drainage layouts, the SuDS concept masterplan is not fixed, and there is flexibility in terms of how the final layout is defined."

However, further text could be added to clarify that the design for the development must address the specifics of a given site, including flood risk assessment and heritage features.

It is acknowledged that the development of these lands in accordance with the underlying zoning objectives will result in the development of existing greenfield areas. In terms of pluvial flood risk, the SDS sets out how proposed development must be drained via SuDS features which will ensure that flow rates and volumes are restricted to pre-development, that is, greenfield. This is also referenced in Objective SEIF08 of the Draft UAP which states "Ensure that surface water run-off from development sites is attenuated to greenfield run-off rates, incorporating appropriate climate change allowances and ensuring that development does not increase flood risk on-site or elsewhere."

Chief Executive's Recommendation

It is recommended that the following amendments are made:

Amend Objective SIEF09 of the Draft UAP to read as follows:

The design of surface water drainage systems shall apply a minimum 20% rainfall climate change allowance **or any revised percentage which may be identified in local or national policy.**

Amend Section 3.4.4 of the Sustainable Drainage Strategy to read as follows:

The future impacts of climate change on rainfall should be accounted for in the design of a drainage scheme. Requirements for climate change allowances are set out in the OPW's

'Climate Change Sectoral Adaptation Plan' published in ~~2019~~ 2025, which recommends a 20% uplift in extreme rainfall depths for the Mid-Range Future Scenario (MRFS) and a 30% uplift for the High-End Future Scenario (HEFS)

Amend Section 3.5.1 to include additional text as follows:

Where site investigation / infiltration testing indicates that existing ground conditions have sufficient capacity for infiltration, groundwater risk screening should be undertaken to demonstrate manageable risk (as set out in Chapter 26, Tables 26.5 and 26.6 of the CIRIA SuDS Manual). **In addition, infiltration SuDS shall not be adopted in areas of known or suspected contamination unless site-specific investigation and risk assessment demonstrate that infiltration would not result in unacceptable mobilisation of contaminants or risk to groundwater.**

Amend Section 4.2 of the SDS to include the following paragraph at the end of the section:

In particular, the detailed layouts and design shall take into account the context and constraints associated with a given site including the findings of site-specific flood risk assessments and, particularly for ground disturbing components such as basins, wetlands and swales, must take into account any identified archaeological and architectural heritage assets and any associated buffer or consultation requirements.

3.19. Appendix 5 Transport Assessment Report

FIN-C973-1, FIN-C973-8, FIN-C973-12, FIN-C973-24, FIN-C973-68, FIN-C973-71, FIN-C973-213, FIN-C973-238, FIN-C973-241, FIN-C973-244, FIN-C973-352, FIN-C973-355, FIN-C973-375, FIN-C973-495, FIN-C973-497, FIN-C973-557, FIN-C973-558, FIN-C973-621, FIN-C973-623, FIN-C973-655, FIN-C973-682, FIN-C973-696, FIN-C973-704, FIN-C973-1146.

Summary of Submissions

A number of submissions raise concerns regarding the transport strategy, infrastructure assumptions and modelling that underpin the Draft Dunsink Urban Area Plan and question whether the proposed transport network can adequately accommodate the scale of planned growth.

Several submissions note that the Draft Plan provides for a substantial increase in population but does not propose significant new strategic road infrastructure or direct additional access to the M50. Concerns are raised that access to the area will continue to rely on a limited number of existing routes, including River Road, Ashtown Road, Scribblestown Lane, Dunsink Lane and Cappagh Road, together with the existing M50

Junction 6. Some submissions state that no new motorway junction, slip roads or other strategic road interventions are proposed despite the scale of development envisaged.

A number of submissions refer to findings within the Transport Assessment which acknowledge existing congestion and capacity constraints on parts of the road network. These submissions question whether the projected growth can be accommodated without additional strategic road investment and request that Fingal County Council investigate options for enhanced access to the M50 and other strategic road improvements, particularly if planned public transport projects are delayed or not delivered within anticipated timeframes.

Some submissions express concern that transport modelling indicates a number of key junctions are forecast to operate close to, or above, capacity under future development scenarios. While junction upgrades, optimisation measures and traffic management interventions are proposed, submissions contend that insufficient evidence has been provided to demonstrate that these measures will adequately address forecast congestion levels.

A recurring theme within submissions is the reliance of the Draft Plan on major public transport investment, particularly the proposed Luas extension to Tyrrelstown. Submissions note that the Transport Assessment is based on a number of public transport interventions that have not yet been approved, funded or progressed to a sufficiently advanced planning stage. Concerns are raised that the Plan does not define clear development phases or delivery timelines and that the transport strategy may be overly dependent on infrastructure that has not yet been approved or funded.

Several submissions highlight that the Transport Assessment assumes a high-frequency Luas service and contend that the report acknowledges uncertainty regarding the interaction between the proposed Tyrrelstown and Finglas Luas services. It is argued that if the required service frequency cannot be achieved, public transport capacity could be lower than forecast and demand on the road network could increase.

Some submissions note that sensitivity testing has been carried out for a scenario where the Luas extension is delayed but state that similar testing has not been undertaken for delays to other key transport projects, including DART+ West and BusConnects. It is argued that any delay in the delivery of these projects could result in increased car dependency and additional pressure on the road network.

A number of submissions question whether the transport strategy places excessive reliance on ambitious walking and cycling targets. These submissions request that

alternative mode-share scenarios, including lower active travel uptake rates, be modelled and assessed in order to understand the implications should projected modal shift targets not be achieved.

Several submissions also question whether the transport modelling adequately accounts for cumulative growth and planned development in surrounding areas, including Ashtown, Pelletstown, Castleknock and the wider Navan Road corridor. Requests are made for confirmation that committed and permitted developments have been incorporated into the modelling assumptions and that wider development pressures have been fully considered.

Some submissions request the publication of the committed development schedule, transport model assumptions and detailed modelling outputs used to inform the Draft Plan. Additional requests are made for the Local Area Model to be extended to assess potential impacts on a wider range of existing residential streets and communities surrounding the plan area.

The submission from the Department of Transport states that the Transport Assessment incorporates a number of public transport interventions which have not yet been formally approved by the National Transport Authority, including proposed bus network enhancements and service assumptions relating to DART+ West and Luas projects. The submission expresses concern that these assumptions may overestimate future public transport accessibility and mode share and recommends that additional sensitivity testing be undertaken to assess outcomes should these interventions not be delivered as assumed.

Submissions also raise concerns regarding the assessment of existing congestion, particularly on the Ratoath Road, Navan Road, Ashtown Road, River Road, Dunsink Lane and Scribblestown Lane corridors. It is argued that existing road and rail networks are already constrained and that future development could place additional pressure on surrounding residential areas. In this regard, submissions seek greater clarity regarding development phasing, annual housing delivery assumptions, transport thresholds, mitigation triggers, monitoring arrangements and the identification of any additional transport measures that may be required as development progresses.

A number of submissions argue that the Draft UAP acknowledges significant road capacity constraints, particularly at the M50/N3 Interchange and the Navan Road/River Road junction, where traffic modelling indicates junctions could operate close to capacity. However, it states that the only proposed mitigation, a review of traffic signal timings, is insufficient and has not been adequately assessed. Submissions therefore contend that

the Draft UAP may not comply with national planning guidance relating to development near national roads. Some submissions queried the Transport modelling and associated conclusions.

Chief Executive's Response

The Draft Dunsink Urban Area Plan has been prepared in accordance with the principles of Transit-Oriented Development (TOD), which seek to accommodate growth through the integration of high-capacity public transport, active travel infrastructure and compact mixed-use development. The transport strategy is designed to reduce reliance on private car travel while ensuring that transport infrastructure is delivered in tandem with development.

The concerns raised regarding the scale of proposed development, the capacity of the existing transport network and the absence of additional strategic road infrastructure are noted. The transport strategy has been informed by a comprehensive Transport Assessment, comprising the National Transport Authority's Eastern Regional Model and a detailed Local Area Model developed specifically for Dunsink and its surrounding area. The modelling incorporated committed and planned development across the wider catchment area, including Ashtown, Pelletstown, Castleknock, Finglas and the wider Navan Road corridor.

The Transport Assessment identifies a range of junction upgrades, traffic management measures, active travel improvements and public transport interventions required to support the phased development of Dunsink. Through an iterative modelling process, these interventions were assessed and refined. While some junctions experienced capacity constraints under initial scenarios, the assessment demonstrates that, following implementation of the proposed mitigation measures, the assessed network can accommodate forecast growth within acceptable operational thresholds.

The submissions requesting additional access to the M50 and further strategic road infrastructure are acknowledged. These options were considered as part of the transport assessment process. However, the provision of additional motorway junctions, slip roads or strategic vehicular connections would be inconsistent with national and regional transport policy, which seeks to prioritise sustainable transport modes, reduce car dependency and protect the strategic function and operational efficiency of the national road network. The transport strategy therefore focuses on public transport, active travel and targeted road network improvements rather than the expansion of strategic road capacity.

A number of submissions raise concerns regarding the reliance on major public transport projects, particularly the proposed Luas extension to Tyrrelstown. The transport strategy has been developed using a phased infrastructure-led approach. Chapter 13 of the Draft UAP links development delivery to the provision of transport infrastructure and services. The delivery of DART+ West, enhanced bus services and active travel infrastructure is required to support the initial phases of development, while the proposed Luas extension supports the later phases and full build-out of the area.

In relation to concerns regarding rail capacity, the Transport Assessment concluded that the Maynooth Rail Corridor will have sufficient capacity to accommodate forecast demand following the implementation of DART+ West. The Railway Order for DART+ West has been approved and the project is progressing through detailed design. The planned upgrade will increase passenger carrying capacity on the corridor from approximately 5,000 passengers per hour to over 13,000 passengers per hour, providing significant additional capacity for future growth. The corridor will also be supported by services operating on the M3 Parkway line and, in the longer term, by the proposed Luas extension to Tyrrelstown.

The concerns raised by the Department of Transport regarding assumptions relating to future public transport services are also noted. The indicative bus network enhancements included within the Transport Assessment were developed in consultation with the National Transport Authority and reflect the level of public transport provision required to support the phased development of Dunsink. Detailed service design and operational arrangements will be subject to further assessment and agreement with the relevant transport agencies.

Submissions requesting additional sensitivity testing and contingency planning in the event of delays to major transport projects are acknowledged. However, the Draft UAP adopts an infrastructure-led approach whereby development is linked to the delivery of transport infrastructure and services. The phasing framework ensures that development cannot proceed beyond specified thresholds without the supporting transport infrastructure being in place. Further transport assessments and modelling will also be required as individual development areas progress through the statutory planning process.

The concerns expressed regarding active travel assumptions and requests for alternative mode-share scenarios are noted. The transport strategy is based on the delivery of a comprehensive network of walking and cycling infrastructure that will connect homes, schools, employment areas, community facilities and public transport services. The active

travel assumptions are therefore linked to the delivery of high-quality infrastructure and the application of Transit-Oriented Development and 15-Minute City principles.

Concerns regarding existing congestion on routes including the Ratoath Road, Navan Road, Ashtown Road, River Road, Dunsink Lane and Scribblestown Lane are acknowledged. The Draft UAP provides for a range of transport and movement interventions, including junction improvements, active travel infrastructure, public transport enhancements and demand management measures, which are intended to support future growth while improving accessibility and network efficiency.

The requests for greater clarity regarding development phasing, transport thresholds, monitoring arrangements and mitigation measures are also noted. Chapter 13 of the Draft UAP establishes a clear relationship between development delivery and infrastructure provision and provides a framework for phasing development over the lifetime of the Plan.

It is noted that requests were made for further publication of modelling assumptions and outputs. The Transport Assessment, including the modelling methodology, assumptions, forecasts, sensitivity testing and Local Area Model analysis used to inform the Draft UAP, was published as part of Appendix 5 of the draft Plan and formed part of the public consultation process. The Transport Assessment demonstrates that the proposed transport strategy, incorporating DART+ West, enhanced bus services, active travel infrastructure, junction improvements and the future Luas extension, can accommodate the planned growth of Dunsink in a manner consistent with national and regional transport policy. The Draft UAP adopts a phased, infrastructure-led approach that links development delivery to the provision of transport infrastructure and services and provides an appropriate framework for the sustainable growth of the area over the lifetime of the Plan.

Chief Executive's Recommendation

No change.

4. List of Chief Executive's Recommendations

This section of the report sets out the recommendations of the Chief Executive to the Elected Members in relation to the Draft Dunsink Urban Area Plan.

In the interests of clarity, the recommendations are presented in the order they would appear in the Draft Dunsink Urban Area Plan document. New text is denoted in green e.g. **new text**, with deleted text denoted by red strikethrough e.g. ~~deleted text~~.

Chief Executives Recommendation (1) –

Amend Figure 4.2 Spatial Framework on page 20 as follows and illustrated on the revised diagram below:

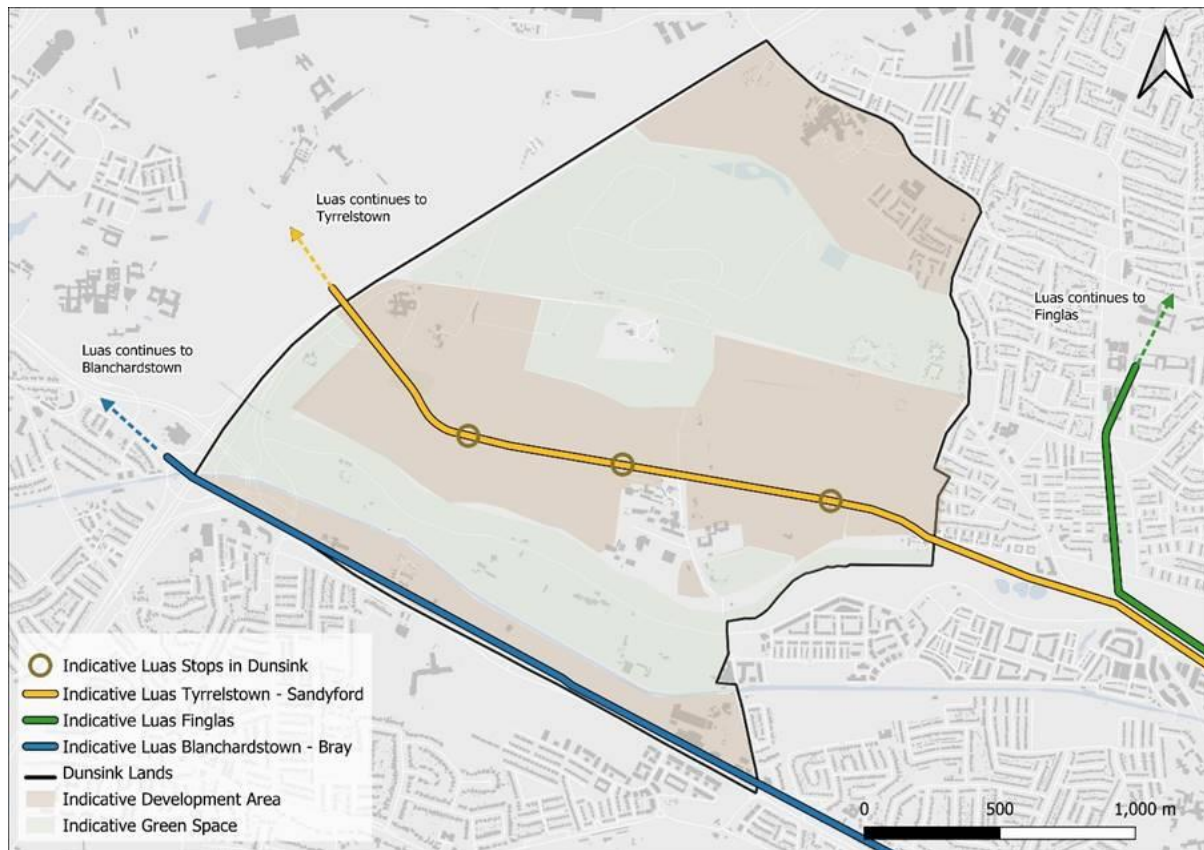
- Omit the block along the eastern boundary of the Plan lands with Woodbank, Valley Park Road and Scribblestown Avenue residential developments and replace it with open space.
- Include an additional residential block north of Scribblestown Park.
- Omit the block at the northeast corner of Dunsink Lane, adjacent to Westwood Road.
- Stagger the building line of the block west of Westwood and Woodbank Avenue residential developments.
- Remove the gateway location from the block north of Scribblestown Lane at the south east corner of the development area and include a gateway location at the most northeasterly block.
- Revised alignment for the Luas line through the Dunsink West development area and consequential changes.



Chief Executives Recommendation (2) –

Amend Figure 5.4 Proposed Public Transport - Light Rail Luas on Page 27 as follows:

Updated indicative Luas alignment route over the M50 to be illustrated (and any other relevant figures within the Draft Plan showing the indicative route alignment) in line with the revised figure below.



Chief Executives Recommendation (3) –

Amend Section 5.4 on page 26 as follows:

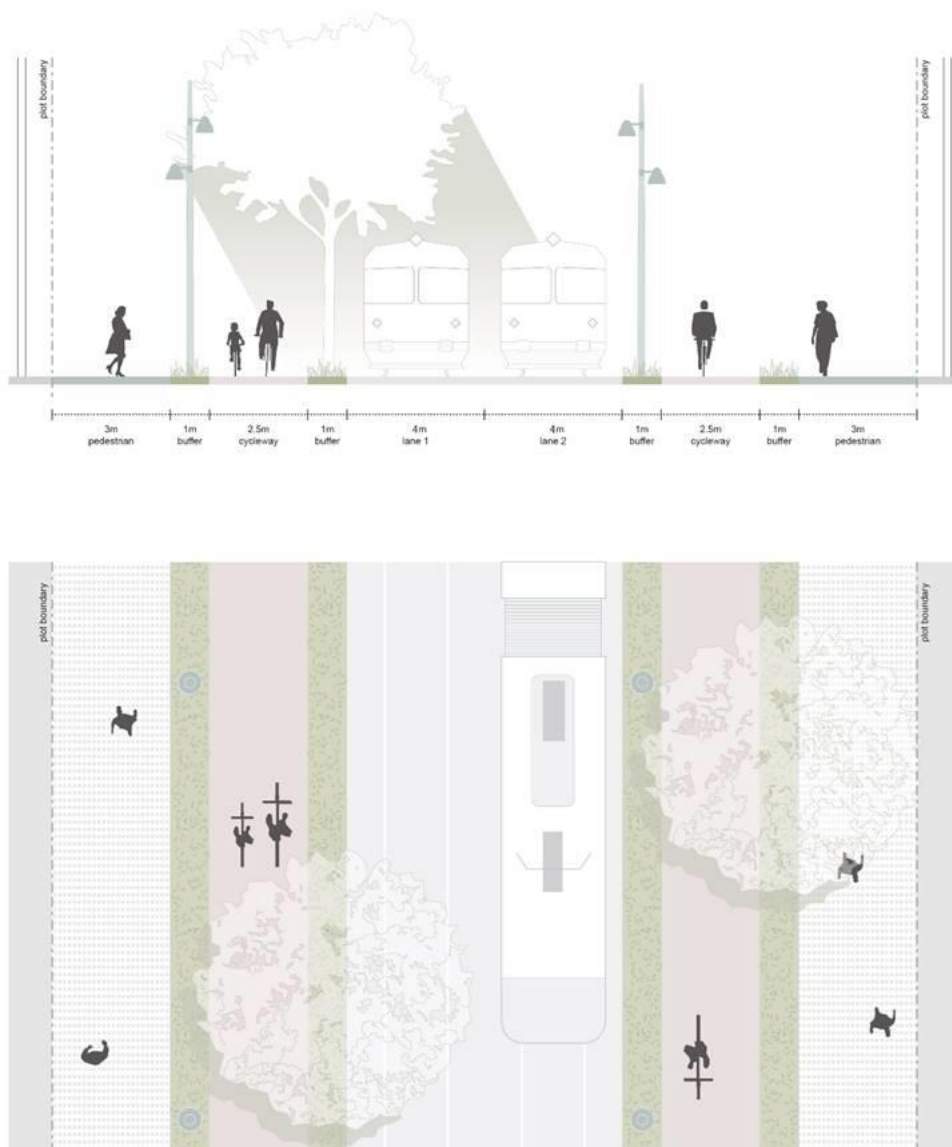
Navan Road Parkway: This will require a new pedestrian and cycle bridge from Dunsink to the station in order to bridge the severance created by the Royal Canal, **while providing consideration for the integration of public transport infrastructure into the design of the structure.**

Chief Executives Recommendation (4) –

Amend Section 5.4 Proposed Public Transport - Light Rail Luas on Page 27 as follows:

'Design considerations for the future Luas' section to include the following text:

"A minimum width of 8 to 10m should be reserved for a Luas alignment excluding any other active travel or public transport requirements, widened to an 18m width for a length of 70m at stop locations. Road junctions across the Luas corridor should be kept to an absolute minimum. All future bridge structures or crossings along the Luas corridor should be designed sufficiently to cater for a Luas alignment and Luas loadings. The Luas crossing of the M50 will be located in such a way as to minimise the length of the crossing lengths and subsequent bridge structures, away from any junction and associated slip lanes, to minimise the future bridge length and safeguard the operational requirements of the M50".



Chief Executives Recommendation (5) –

Amend Objective CM04 Proposed Public Transport - Light Rail Luas on Page 27 as follows:
CM04: Safeguard and reserve a continuous corridor within the Plan lands for the provision of a future Tyrrelstown Luas route, including adequate reservations for three Luas stops within the core development areas, **ensuring that future development is designed in a manner that does not prejudice the delivery of a future Luas along the identified corridor."**

Chief Executives Recommendation (6) –

Amend Section 5.4 Proposed Public Transport – Bus on Page 28 as follows:

~~New B5 Spine Bus: This spine bus route will travel from the City Centre to Blanchardstown via Dunsink, offering local and wider connectivity.~~

Chief Executives Recommendation (7) –

Amend Section 5.4 Urban Layout to Accommodate Buses on Page 28 as follows:

Delete the following text:

~~“Bus provision shall be agreed in consultation with the NTA”~~

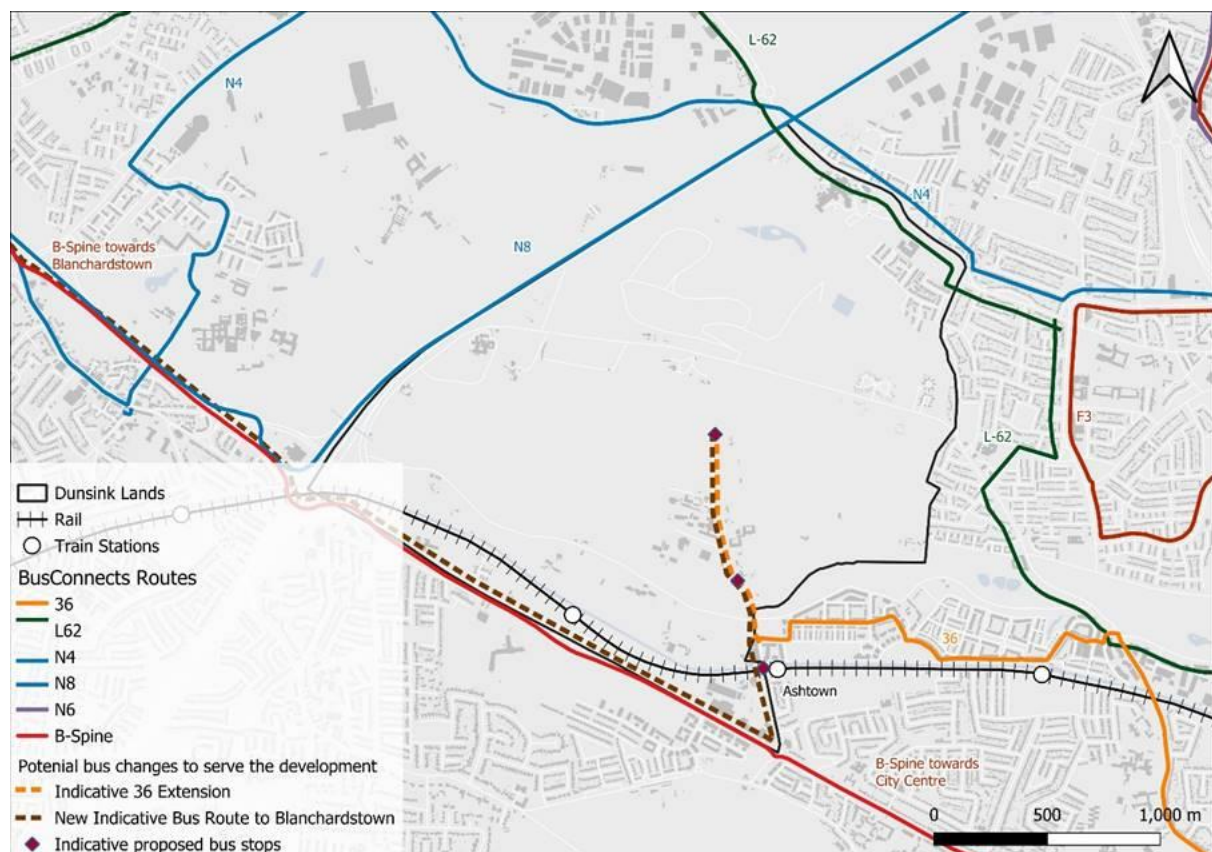
Include updated text as follows:

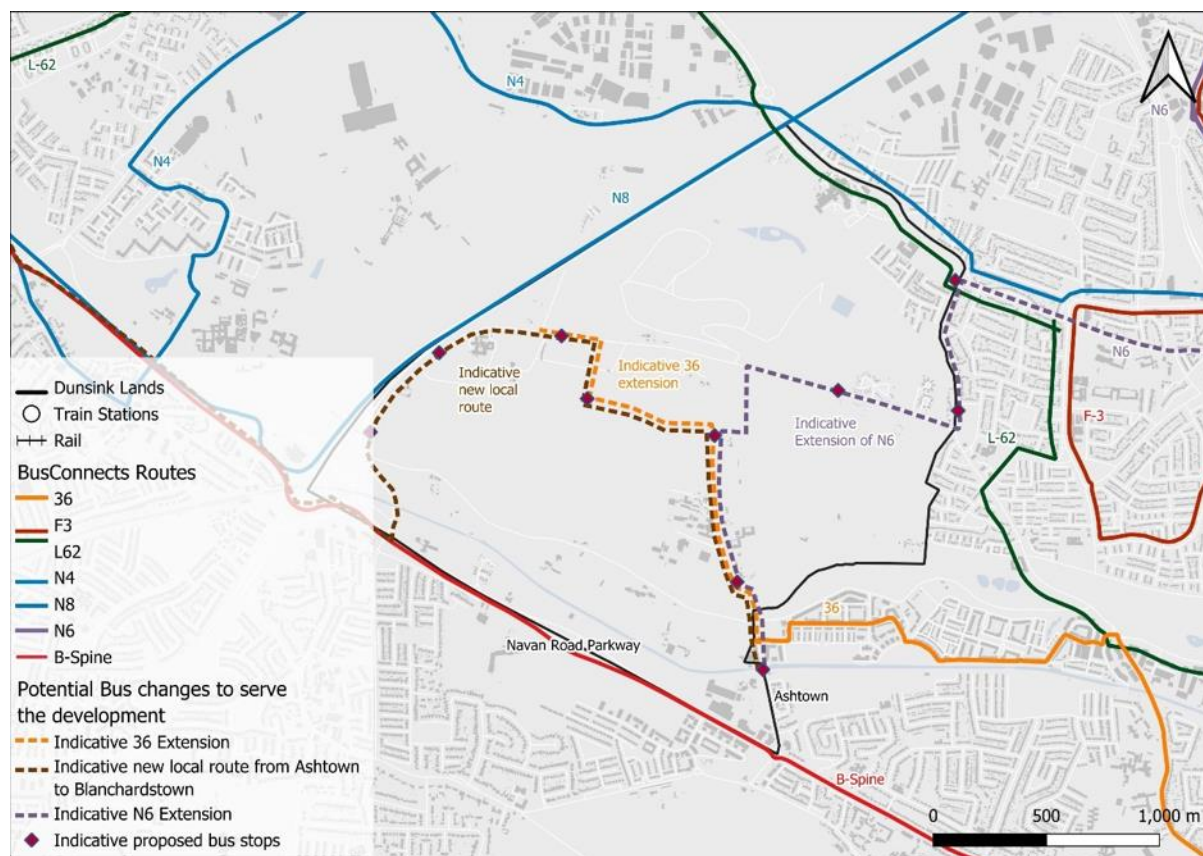
While provision has been made for bus routes within the urban area plan, these bus routes will be subject to more detailed planning and design work prior to implementation. This design work will be led by NTA in partnership with Fingal County Council.

Chief Executives Recommendation (8) –

Amend Figure 5.5 BusConnects Maps Phases 1, 2 / Full Build Out on Page 28 as follows:

Include indicative bus stop location maps and bus terminus infrastructure (including turning circles, laybys and driver welfare facilities as illustrated in the figures below and overleaf





Chief Executives Recommendation (9) –

Amend Section 5.4 Proposed Public Transport – Bus on Page 29 as follows:

Insert additional objective after Objective CM07 and CM08 as follows:

Ensure that the street network, including junctions, will accommodate future movement by bus.

Chief Executives Recommendation (10) –

Amend Section 5.5 Proposed Active Travel Provision, Page 31, under Quietway on River Road as follows:

Insert the following text:

River Road is proposed to become a designated quietway. Quietways are cycling and walking routes designed to provide a safer, calmer alternative to busy main roads. Through traffic will be removed by installing a filtered permeability solution. **Local access to residents and businesses situated along River Road will be maintained from the M50 and Ashtown Road/Dunsinea Lane.**

Chief Executives Recommendation (11) –

Amend Section 5.5 Proposed Active Travel Provision on Page 31 under Segregated Cycleways:

Insert the following text:

Two connections will link directly to Navan Road Parkway and Ashtown Rail Stations, enabling seamless access to the future DART+ West and the Royal Canal Greenway. The link to Navan Road Parkway station will also allow links with the Royal Canal Greenway **and if feasible, should also provide a link to Coolmine Rugby Club.**

Chief Executives Recommendation (12) –

Amend Section 5.10 Construction Traffic Management on Page 39 as follows:

Insert the following text as the end of the paragraph:

Construction traffic associated with the development of the Dunsink lands shall be directed to utilise designated routes connected to the strategic road network, including the N3, M50 and Dunsink Lane, to the greatest extent possible. The use of local residential streets for construction traffic shall be avoided wherever possible, and in circumstances where this is proposed, it shall be demonstrated to the satisfaction of the Planning Authority that no feasible alternative is available.

Chief Executives Recommendation (13) –

Amend Objective SIEF09 of the Draft UAP to read as follows:

The design of surface water drainage systems shall apply a minimum 20% rainfall climate change allowance **or any revised percentage which may be identified in local or national policy.**

Chief Executives Recommendation (14) –

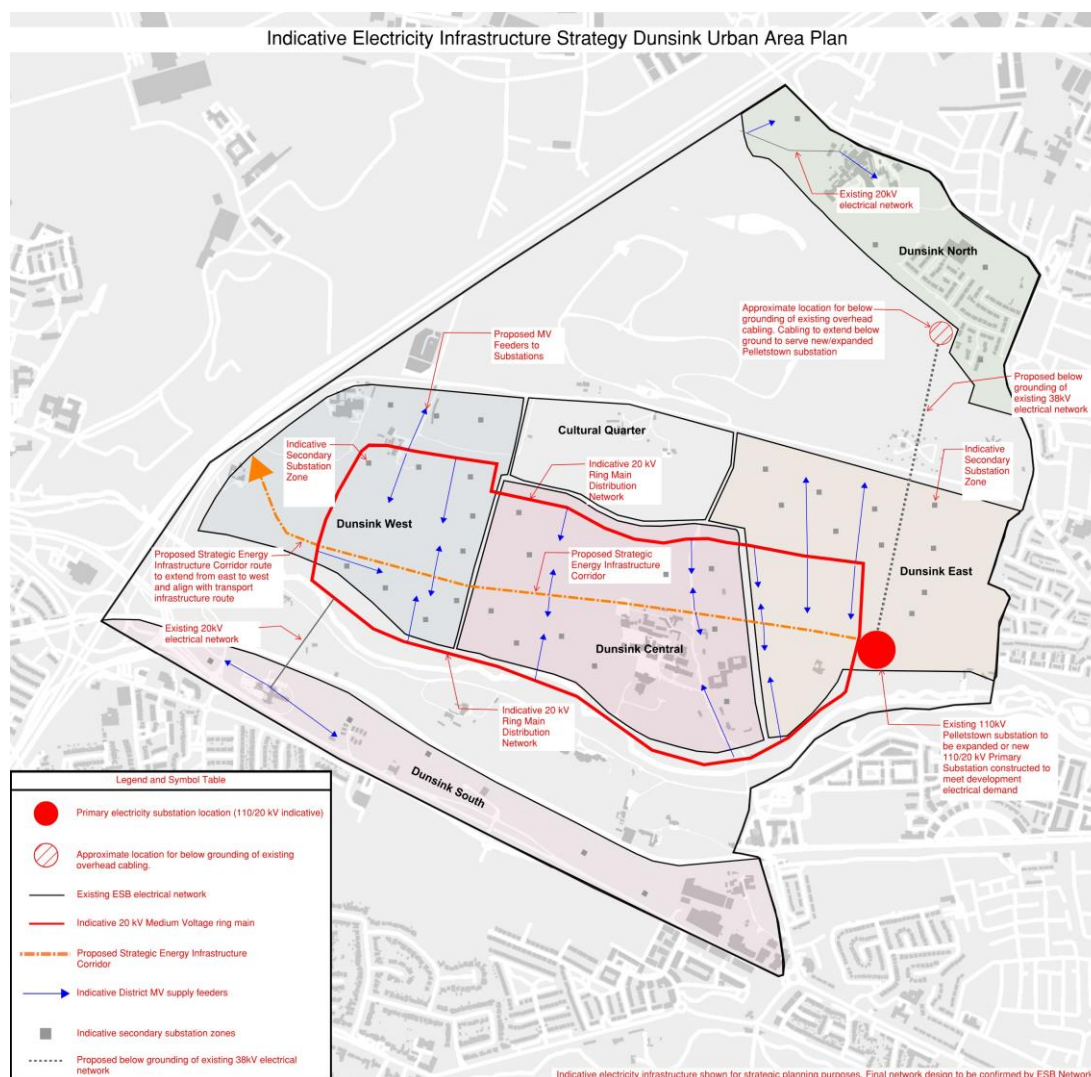
Amend Section 6.6 to include a new objective as follows (numbering to be in sequence)

“Have regard to the OPW Flood Risk Management Guidelines 2009, as revised by Circular PL 2/2014, when assessing planning applications and to require commensurate site specific flood risk assessments to be considered for all new developments within the Plan area. All development must prepare a Stage 1 Flood Risk Analysis and if the flooding risk is not screened out, they must prepare a Site-Specific Flood Risk Assessment (SSFRA) for the development, where appropriate.”

Chief Executives Recommendation (15) –

Amend Figure 6.3 on page 44 as follows:

Clearly identify the proposed under grounding of the relevant infrastructure with the northern section of the proposed Regional Park lands to remove any ambiguity regarding the location of primary substation infrastructure.



Chief Executives Recommendation (16) –

Amend objective SIEF12 on page 45 as follows:

Require development proposals to integrate a coordinated ~~20 kV~~ ring main backbone and associated secondary substations, **with the voltage level and network configuration to be determined by ESB Networks, and to be** delivered in tandem with development and integrated with urban design, flood risk management and green infrastructure.

Chief Executives Recommendation (17) –

Amend Objective GI10 on page 54 as follows:

'Support the development of a Regional Park and Recreational Hub for passive and active recreational uses, incorporating biodiversity restoration and enhancement measures, habitat creation and green linkages at the former Dunsink landfill, **and provide for its long-term management and maintenance to ensure its continued ecological, recreational and environmental value.**

Chief Executives Recommendation (18) –

Amend the wording in Table 8.1 on page 67 as follows:

Structure Name	RPS No.	NIAH Building & Garden Survey Number	Description
Ashtown Mill & Mill Race/Channel	0691	11362067	Early 19th century former linseed oil mill complex consisting of mill building and ancillary historic buildings. The route of the water channel/ mill race serving the mill and site of the mill pond may still survive. forms part of the mill complex. The site of the mill pond has been covered in by a parking area but elements may survive underneath.

Chief Executives Recommendation (19) –

Amend the wording in Table 8.2 on page 68 as follows

Structure Name	Description
Masonry Bridge, Dunsinea Lane	Double arched masonry bridge over the River Tolka. Partially damaged in the 1950s by flooding.

Chief Executives Recommendation (20) –

Amend objective AACH13 on page 72 as follows:

'Development proposals where relevant, shall incorporate the required landscape setback, high quality and context-sensitive design, appropriately scaled building heights

and carefully designed low impact lighting and the protection of key views, informed by an Architectural Heritage Impact Assessment and Visual Impact Assessment, **including 3D modelling information**, to be undertaken by suitably qualified professionals, in order to protect the scientific and cultural significance of Dunsink Observatory'.

Chief Executives Recommendation (21) –

Amend Table 9.1 on page 77 to add the following text (other content of the table remains unchanged).

Category Infrastructure Resource	Category Infrastructure Resource
Sports and Recreation	- Coolmine Rugby Club - Phoenix Football Club - Elmgreen Golf Club - Play Area (Dunsoghly Drive) St. Joseph's Horse & Pony Club

Amend Figure 9.1 to include reference to St. Joseph's Horse & Pony Club.

Chief Executives Recommendation (22) –

Amend Table 9.2 as follows (other content of the table remains unchanged)

Category	Provision
Health and Social Services Sports and Recreation	- Coolmine Rugby Club - Phoenix Football Club - Elmgreen Golf Club - Play Area (Dunsoghly Drive)
Sports and Recreation Health and Social Services	- Ashtown Medical Centre - Village Medical Centre Finglas - Finglas West Family Resource Centre

Chief Executives Recommendation (23) –

Amend Section 9.3.2 as follows:

Aligned with childcare provision, meeting the requirements of future primary and post-primary aged persons, **including children and young people with special educational needs**, in Dunsink represents a critical element in creating a long-term community.

Based on demographic information recorded by the Census in 2022 and taking cognisance of the national declining birth rate as per CSO data/projections, it is estimated that c.6 no. primary schools and c.4 no. post primary schools may ultimately be required for Dunsink. The Urban Area Plan makes provision for 10 no. school locations across

Dunsink **to accommodate these requirements or, alternatively if required, the sites can facilitate special educational needs schools.**

Chief Executives Recommendation (24) –

Amend Figure 12.2 Spatial Layout Overview on page 89 as follows and illustrated on the revised diagram below:

- Omit the block along the eastern boundary of the Plan lands with Woodbank, Valley Park Road and Scribblestown Avenue residential developments and replace it with open space.
- Include an additional residential block north of Scripplestown Park.
- Omit the block at the northeast corner of Dunsink Lane, adjacent to Westwood Road.
- Stagger the building line of the block west of Westwood and Woodbank Avenue residential developments.
- Revised alignment for the Luas line through the Dunsink West development area and consequential changes to the block layout in this area.



Chief Executives Recommendation (25) –

Amend text in Section 12.2.1 as follows:

The density of development in this area will range from approximately ~~75~~ **50** to ~~200~~ **150** units per hectare (net) with the lower figure relating to the first phase of development. Thereafter, densities will increase to support public transport investment.

Chief Executives Recommendation (26) –

Amend objective UDF13 on page 90 as follows:

‘Implement low impact ~~public~~ **external** lighting that minimises light spill and skyglow across the development area in accordance with the ~~public~~ **external** lighting requirements of this Plan.’

Chief Executives Recommendation (27) –

Include new objective on page 91 as follows: (number to sequentially follow UDF 22 as listed in the Draft Plan)

Ensure that future development proposals incorporate an appropriate interface with existing residential areas, ensuring that building height, scale, massing and layout are carefully designed to protect residential amenity.

Chief Executives Recommendation (28) –

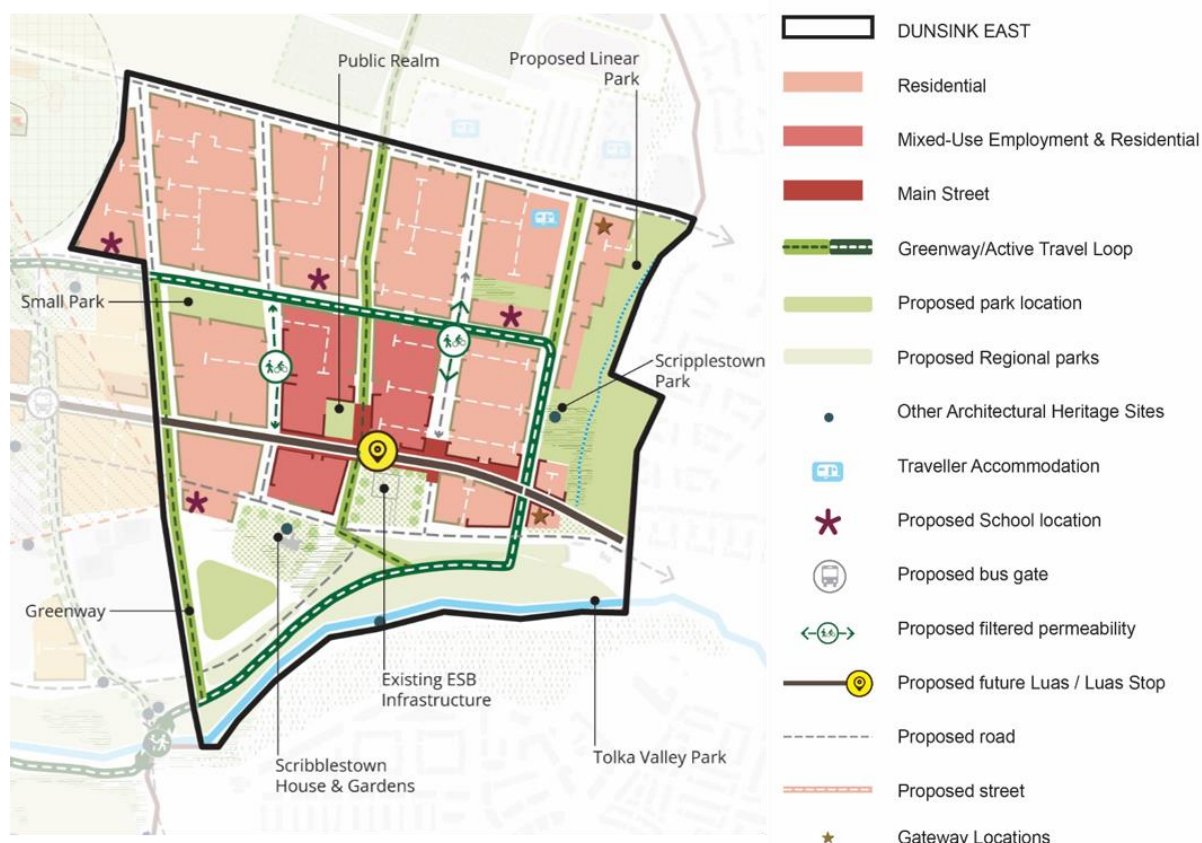
Amend table on P. 91 as follows:

Density Range (Net)	c. 75 50 – c. 200 150 dph
Approximate Unit Range	c.6,500 no. – c.6,800 no. c. 1900 no. – 5,700 no.

Chief Executives Recommendation (29) –

Amend Figure 12.4 Dunsink East Development Area-Spatial Framework on page 92 as follows and illustrated on the revised diagram below:

- Omit the block along boundary with Woodbank, Valley Park Road and Scribblestown Avenue residential developments and replace it with open space.
- Include an additional residential block north of Scribblestown Park.
- Omit the block at the northeast corner of Dunsink Lane, adjacent to Westwood Road.
- Illustrate proposed gateway building locations at southeast corner of the development area.



Chief Executives Recommendation (30) –

Amend Section 12.2.2 at page 94 as follows:

The density of development in this area will range from approximately ~~75-50~~ to ~~160-140~~ units per hectare (net), with the lower figure relating to the first phase of development.

Chief Executives Recommendation (31) –

Amend Section 12.2.2 at page 94 as follows:

The proposed active travel bridge is a key piece of infrastructure within the Plan area, providing a direct connection between residential areas and the Navan Road Parkway Rail Station. By prioritising walking and cycling, it supports sustainable mobility and integrates the Plan lands with the wider transport network. **Consideration can also be given to the potential integration of public transport infrastructure into the design of this bridge.**

Chief Executives Recommendation (32) –

Amend objective UDF38 on page 96 as follows:

‘Lighting shall be low impact and designed to avoid glow or light spill in accordance with the **external** lighting strategy for the Plan area.’

Chief Executives Recommendation (33) –

Amend UDF47 at page 96 as follows:

UDF47 The proposed active travel bridge linking to the existing Navan Road Parkway rail station shall be designed as a high-quality and inclusive piece of infrastructure that prioritises pedestrians and cyclists and demonstrating high-quality architectural design, structural form and material finish. **Consideration can also be given to the potential integration of public transport infrastructure into the design of this bridge.** The bridge shall be fully integrated into the surrounding landscape and movement network, ensuring seamless connectivity and universal accessibility. Appropriate and sensitive treatment shall be provided at each landing point with well-designed public realm and strong visual and physical connections into adjoining areas.

Chief Executives Recommendation (34) –

Amend table on P. 96 as follows:

Density Range (Net)	c. 75 50 – c. 160 140 dph
Approximate Unit Range	c.4,250 no. – c.4,550 no. c. 1,600 no. – 4,500 no.

Chief Executives Recommendation (35) –

Amend objective UDF67 on page 99 as follows:

‘Implement low impact ~~public~~ **external** lighting that minimises light spill and skyglow across the development area in accordance with the ~~public~~ **external lighting** requirements of this Plan.’

Chief Executives Recommendation (36) –

Include new objective at page 99 as follows: (numbers to sequentially follow UDF 68 as listed in the Draft Plan):

Development proposals adjoining or affecting national road infrastructure shall protect the M50's strategic function, operation and physical integrity, including drainage, bridges and structures, demonstrate compliance with all relevant TII Publications (Standards and Technical) requirements and ensure that the safety, operation, maintenance and capacity of the motorway and associated assets are not adversely affected.

Chief Executives Recommendation (37) –

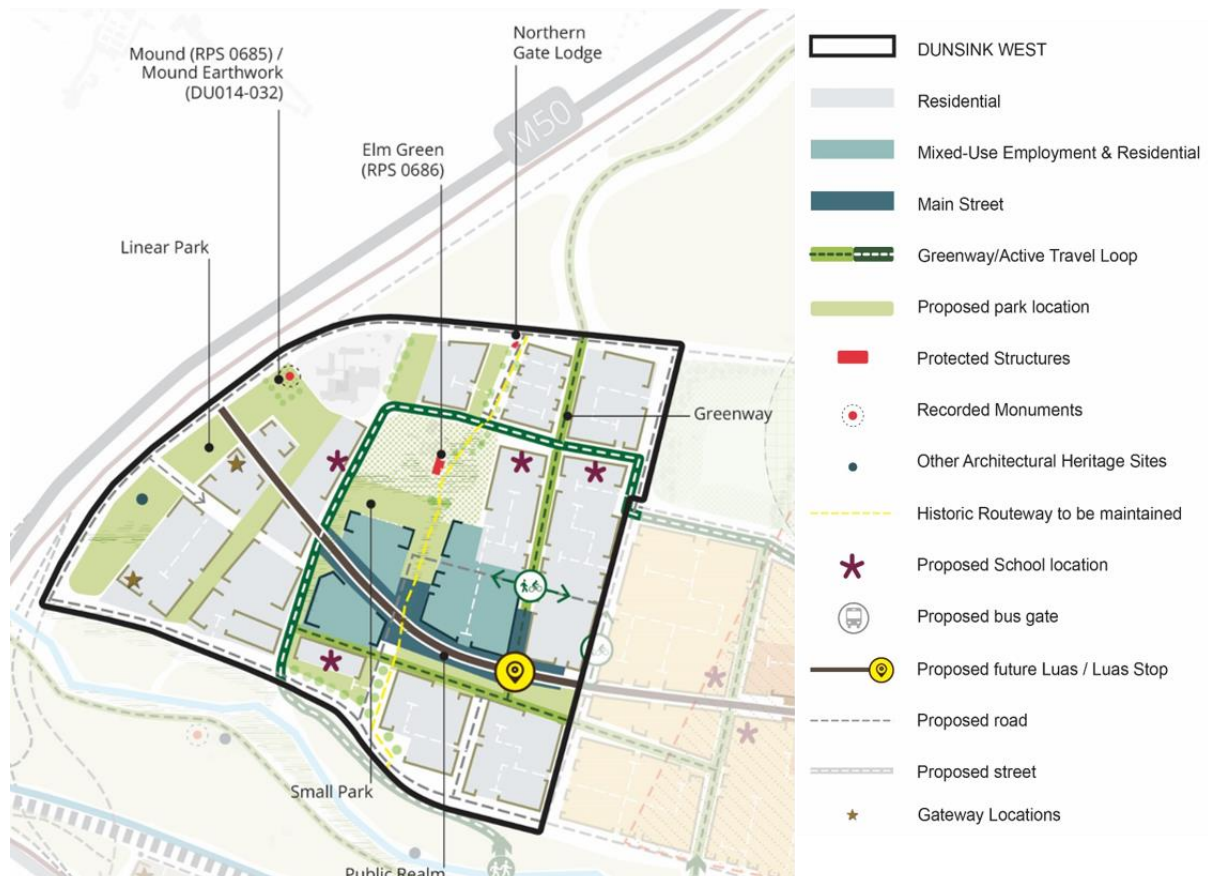
Amend table on P. 99 as follows:

Density Range (Net)	c. 190 120 – c. 220 180 dph
Approximate Unit Range	c.6,750 no. – c.7,050 no. c. 4,000 no. – 6,000 no.

Chief Executives Recommendation (38) –

Amend Figure 12.9 Dunsink West Development Area-Spatial Framework on page 100 as follows and illustrated on the revised diagram below:

- Amend the alignment of the Luas line through the area and the M50 crossing point location.
- Consequentially revise, the indicative block layout and the proposed location of the Luas stop in this area.



Chief Executives Recommendation (39) –

Amend Figure 12.12 Dunsink Cultural Quarter Conceptual Image on Page 104 as follows:
Remove the space in boundary wall at the Meridian Wall to illustrate a closed boundary wall.

Chief Executives Recommendation (40) –

Include new objective at page 105 as follows: (number to sequentially follow UDF 84 as listed in the Draft Plan)

To support the continued operation and future development of the National Orthopaedic Hospital Cappagh and ensure that future development, including road

connections, public transport infrastructure and active travel routes, reinforces and protects hospital operations, accessibility, patient safety and security.

Chief Executives Recommendation (41) –

Include new objective at page 105 as follows: (numbers to sequentially follow UDF 85 as listed in the Draft Plan)

Development proposals adjoining or affecting national road infrastructure shall protect the M50's strategic function, operation and physical integrity, including drainage, bridges and structures, demonstrate compliance with all relevant TII Publications (Standards and Technical) including the Spatial Planning and National Roads Guidelines and ensure that the safety, operation, maintenance and capacity of the motorway and associated assets are not adversely affected.

Chief Executives Recommendation (42) –

Amend Objective UDF89 at page 107 as follows:

Provide pedestrian and cycle linkages to the wider Plan lands, surrounding neighbourhood and key public transport infrastructure, particularly the Navan Road Parkway rail station **and including the provision of such linkages to existing community facilities, such as the Coolmine Rugby Club lands, where feasible.**

Chief Executives Recommendation (43) –

Include new objective at page 107 as follows: (numbers to sequentially follow UDF 92 as listed in the Draft Plan)

Protect and enhance the built and natural heritage of the Royal Canal and ensure that development along it or within its vicinity is sensitively designed and does not have a detrimental effect on the character of the Canal, its built elements and its natural heritage values. Works to the built fabric of the Royal Canal should have regard to Waterways Ireland's Heritage and Biodiversity Plan 2030 and Guidelines for Conservation of Built Heritage-Repair and maintenance of heritage structures on the inland waterways of Ireland, (2015).

Chief Executives Recommendation (44) –

Include new objective on page 109 as follows: (numbers to sequentially follow UDF 103 as listed in the Draft Plan)

Development proposals adjoining or affecting national road infrastructure shall protect the M50's strategic function, operation and physical integrity, including drainage, bridges and structures, demonstrate compliance with all relevant TII Publications (Standards and Technical) including the Spatial Planning and National Roads Guidelines and ensure that the safety, operation, maintenance and capacity of the motorway and associated assets are not adversely affected.

Chief Executives Recommendation (45) –

Amend Section 12.3 Scale and Density of Development at page 114 as follows:

The gross plot area of the East, Central and West development areas constitutes c.165 hectares. The calculated net residential area of this land is c.102 hectares. The net residential area excludes non-residential uses such as reserved school sites, proposed parks, commercial and community uses. The overall net residential density figure for the East, Central and West development area aligns with those set out in the Sustainable Residential Development and Compact Settlement Guidelines (2024) for City-Urban Neighbourhoods between 50-250 dph. **It should be noted that the net residential area of c.102 hectares is indicative only. This figure may be subject to change as individual development proposals are brought forward.**

The inclusion of the lower range density of ~~75~~ **50** units per hectare (net) is envisaged for the first phase of development with the subsequent phases providing density at the higher level to support high capacity public transport investment.

Chief Executives Recommendation (46) –

Amend Section 12.4.4 'Gateway/Landmark Buildings' at page 116 as follows:

Gateway buildings ~~can be signified by increased height and/or~~ **shall be signified by** distinctive architectural treatment.

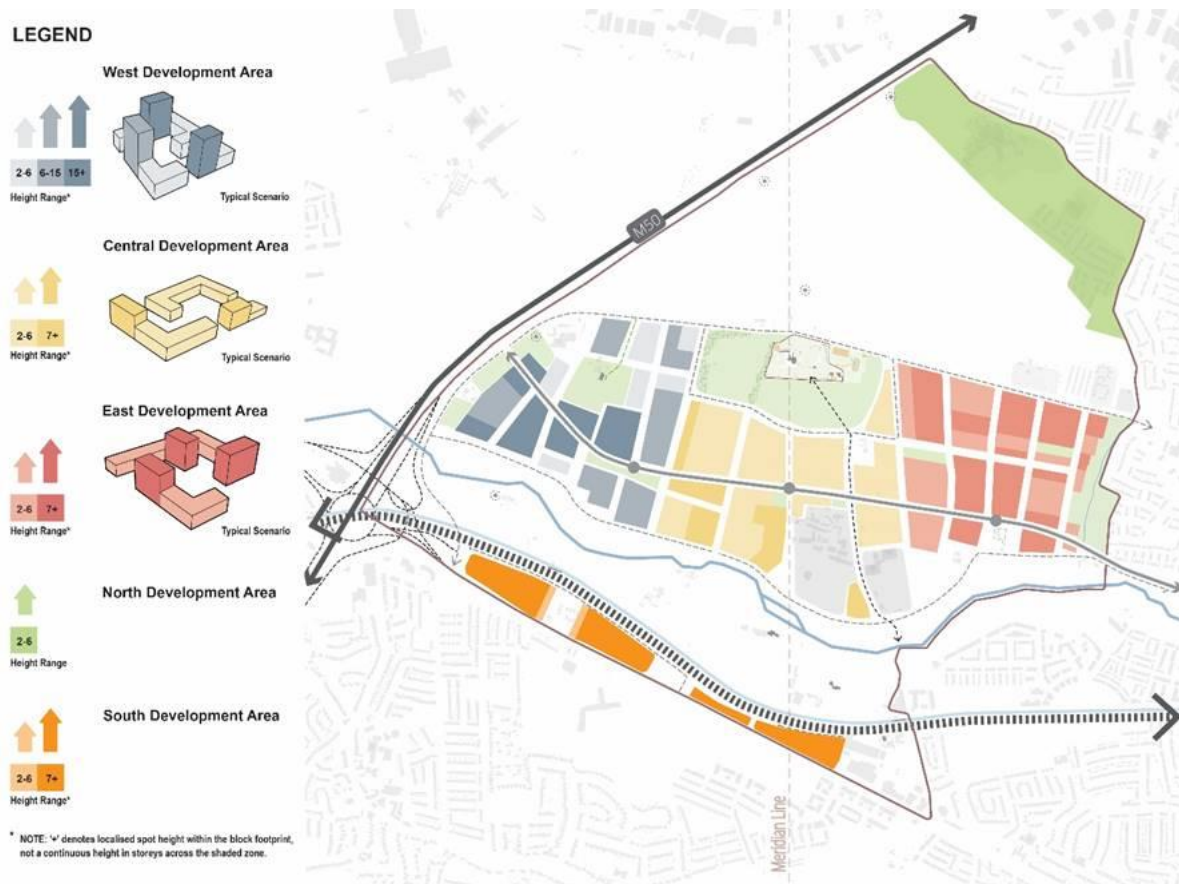
....

Fig. 12-18 shows indicative building heights ~~and gateway locations~~ within the Plan lands.

Chief Executives Recommendation (47) –

Amend Figure 12.18 Building Heights on page 116 as follows and illustrated on the revised diagram below:

- Omit the block along boundary with Woodbank, Valley Park Road and Scribblestown Avenue residential developments and replace it with open space.
- Include an additional residential block north of Scribblestown Park.
- Omit the block at the northeast corner of Dunsink Lane, adjacent to Westwood Road.
- Remove gateway building designation from blocks shown and replace with height of 2-6 storeys height for the Dunsink East development area and 15+ storeys height in the Dunsink West development area.
- Include footnote with respect to upper building heights.



Chief Executives Recommendation (48) –

Amend text in Section 12.3 as follows:

The inclusion of the lower range density of ~~75~~ 50 units per hectare (net) is envisaged for the first phase of development with the subsequent phases providing density at the higher level to support high capacity public transport investment.

Chief Executives Recommendation (49) –

Amend Section 12.5 as follows:

Change heading of Section 12.5 to read '~~Public~~ External Lighting in the Landscape'

Include additional text at the start of the section as follows:

This guidance and associated objectives relate to external lighting in the landscape including but not limited to public lighting, commercial, recreational, exterior building lighting and signage lighting.

Chief Executives Recommendation (50) –

Amend UDF 117 at page 118 as follows:

UDF117 Planning applications for development proposals which include ~~public~~ **external** lighting shall be accompanied by a detailed ~~public~~ **external** lighting design which shall comply with the principles as outlined in this Plan.

Chief Executives Recommendation (51) –

Include one objective at page 118 as follows (numbering to sequentially follow UDF117 as listed in the Draft Plan):

To require a commensurate lighting impact assessment to be submitted with all applications which include external lighting to assess potential impacts associated with the proposed external lighting design including the minimisation of light spill, glare and sky glow, the protection of biodiversity and residential amenity and the safeguarding of the operational integrity of Dunsink Observatory.

Chief Executives Recommendation (52) –

Include one objective at page 118 as follows (numbering to sequentially follow UDF118 as listed in the Draft Plan):

Restrict the use of externally illuminated and digital advertising displays where they would result in unacceptable impacts on dark sky conditions, residential amenity, biodiversity, landscape character or the operation of Dunsink Observatory.

Chief Executives Recommendation (53) –

Amend Phase 1 infrastructure requirements on P. 120 as follows:

Insert additional bullet point to read:

Improvements to Dunsink Lane as are necessary to accommodate construction traffic.

Chief Executives Recommendation (54) –

Amend Phase 2 infrastructure requirements on P. 121 as follows:

Amend text as follows:

Upgrade of Dunsink Lane **completed** and central portion of Southern Link Road confirmed.

Chief Executives Recommendation (55) –

Amend Section 13.2 on page 120 as follows:

Include an additional bullet point in Phase 1:

Future proof all residential development and potential major heat users to connect into future district heating system as appropriate.

Chief Executives Recommendation (56) –

Provide for review and correction/update as necessary of the SEA Environmental Report and AA Natura Impact Report.

Chief Executives Recommendation (57) –

Amend Table 7.1 to read as follows:

Highly Vulnerable	Greater of: • 0.1% AEP (present day / Flood Zone B) flood level + 500 mm freeboard • 0.1% AEP MRFS HEFS CC flood level + 250 mm freeboard
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Chief Executives Recommendation (58) –

Amend Section 2.4 of the Strategic Flood Risk Assessment as follows:

The Royal Canal is situated between the River Tolka and southern boundary of the Plan Area. ~~A number of open water features associated with the Dunsink landfill are located in the northern portion of the Plan Area.~~

Flood risk from identified open water features is considered subsequently in the report. **It is noted that a number of 'artificial' / controlled open water features associated with the Dunsink landfill are located in the northern portion of the Plan Area but are not considered a source of fluvial flooding and as such, do not form part of this assessment.**

Chief Executives Recommendation (59) –

Amend Section 3.4.4 of the Sustainable Drainage Strategy to read as follows:

The future impacts of climate change on rainfall should be accounted for in the design of a drainage scheme. Requirements for climate change allowances are set out in the OPW's 'Climate Change Sectoral Adaptation Plan' published in ~~2019~~ **2025**, which recommends a 20% uplift in extreme rainfall depths for the Mid-Range Future Scenario (MRFS) and a 30% uplift for the High-End Future Scenario (HEFS)

Chief Executives Recommendation (60) –

Amend Section 3.5.1 to include additional text as follows:

Where site investigation / infiltration testing indicates that existing ground conditions have sufficient capacity for infiltration, groundwater risk screening should be undertaken to demonstrate manageable risk (as set out in Chapter 26, Tables 26.5 and 26.6 of the CIRIA SuDS Manual). **In addition, infiltration SuDS shall not be adopted in areas of known or suspected contamination unless site-specific investigation and risk assessment demonstrate that infiltration would not result in unacceptable mobilisation of contaminants or risk to groundwater.**

Chief Executives Recommendation (61) –

Amend Section 4.2 of the SDS to include the following paragraph at the end of the section:

In particular, the detailed layouts and design shall take into account the context and constraints associated with a given site including the findings of site-specific flood risk assessments and, particularly for ground disturbing components such as basins, wetlands and swales, must take into account any identified archaeological and architectural heritage assets and any associated buffer or consultation requirements.

Appendix A List of Submissions Received

The table below lists the submissions received in relation to the Draft Dunsink Urban Area Plan. The table provides the unique reference number assigned to the submission by the Council's online portal and the name of the person or organisation making the submission. Each submission may be viewed online at:

<https://consult.fingal.ie/en/node/42106/submissions>

URN	Individual/Author	Type	On Behalf Of
FIN-C973-1	Ruarc Sorensen	Individual	
FIN-C973-2	Alison Ryan	Individual	
FIN-C973-3	Elaine Coffey	Individual	
FIN-C973-4	Eamonn Walsh	Individual	
FIN-C973-5	David Farrell	Individual	
FIN-C973-6	Darren J. Prior	Individual	
FIN-C973-7	Cian McGuire	Individual	
FIN-C973-8	Melvin Properties Limited	Organisation	
FIN-C973-9	James Carr	Individual	
FIN-C973-10	Patrick Mc Donagh	Individual	
FIN-C973-11	Carol Romero	Individual	
FIN-C973-12	Lucy McGinty	Individual	
FIN-C973-13	Cycling Ireland	Organisation	
FIN-C973-14	Michael Kelly	Individual	
FIN-C973-15	The Health & Safety Authority	Organisation	
FIN-C973-16	Jennifer Kane	Individual	
FIN-C973-17	Tamara Whelan	Individual	
FIN-C973-18	Erin's Isle GAA Club	Organisation	
FIN-C973-19	Hugo Gaudino	Individual	
FIN-C973-20	Noel Kelly	Individual	
FIN-C973-21	Philip Vavasour	Individual	
FIN-C973-22	Micheal Halton	Individual	
FIN-C973-23	Joanne McGrath	Individual	
FIN-C973-24	Pia Mc Dermott	Individual	
FIN-C973-25	Lauren OBrien	Individual	
FIN-C973-26	Ian Pike	Individual	
FIN-C973-27	Gavin Fitzgerald	Individual	
FIN-C973-28	Niamh Harford	Individual	
FIN-C973-29	Niamh Harford	Individual	
FIN-C973-30	Niamh Harford	Individual	
FIN-C973-31	Niamh Harford	Individual	
FIN-C973-32	Niamh Harford	Individual	
FIN-C973-33	Niamh Harford	Individual	

FIN-C973-34	Liam Moore	Individual	
FIN-C973-35	David Murphy	Individual	
FIN-C973-36	Simon Cooper	Individual	
FIN-C973-37	David O connor	Individual	
FIN-C973-38	James Neylon	Individual	
FIN-C973-39	Sarah Daly	Individual	
FIN-C973-40	Liam Billington	Individual	
FIN-C973-41	Colm Sheedy	Individual	
FIN-C973-42	Eiméar O'Flanagan	Individual	
FIN-C973-43	Sorcha Burns	Individual	
FIN-C973-44	Declan Ryan	Individual	
FIN-C973-45	Amy Fagan	Individual	
FIN-C973-46	Paul Martin	Individual	
FIN-C973-47	Stephen Crosbie	Individual	
FIN-C973-48	Robert Grogan	Individual	
FIN-C973-49	Jade Mcloughlin	Individual	
FIN-C973-50	Robert Shaw	Individual	
FIN-C973-51	David Tolan	Individual	
FIN-C973-52	Sandra Cooper	Individual	
FIN-C973-53	Thomas Devlin	Individual	
FIN-C973-54	Lynne Mooney	Individual	
FIN-C973-55	Martha Cleary	Individual	
FIN-C973-56	Philip Fitzgerald	Individual	
FIN-C973-57	Claire Murphy	Individual	
FIN-C973-58	A Ridgeway	Individual	
FIN-C973-59	Stacey Cummins	Individual	
FIN-C973-60	Andrew Finnegan	Individual	
FIN-C973-61	Caitriona OConnor	Individual	
FIN-C973-62	Louise McGrane	Individual	
FIN-C973-63	Richard O Neill	Individual	
FIN-C973-64	Mary Molloy	Individual	
FIN-C973-65	Jennifer Jones	Individual	
FIN-C973-66	Anne O'Donovan	Individual	
FIN-C973-67	Liam Graham	Individual	
FIN-C973-68	Gareth Martin	Individual	
FIN-C973-69	Elaine McDermott	Individual	
FIN-C973-70	Roy Larkin Larkin	Individual	
FIN-C973-71	Maria Makarevich	Individual	
FIN-C973-72	Graham Donnelly	Individual	
FIN-C973-73	Aoife Kavanagh	Individual	
FIN-C973-74	Aoife byrne	Individual	
FIN-C973-75	Jude Casey	Individual	
FIN-C973-76	Austin Kelly	Individual	
FIN-C973-77	David Boland	Individual	
FIN-C973-78	Jemma Kelly	Individual	

FIN-C973-79	Nicola Mooney Dowling	Individual	
FIN-C973-80	Jacqui Mythen	Individual	
FIN-C973-81	Ray McDermott	Individual	
FIN-C973-82	Jason Ó Muirí	Individual	
FIN-C973-83	Kolyn Byrne	Individual	
FIN-C973-84	Caitriona OConnor	Individual	
FIN-C973-85	Sinead Farrell	Individual	
FIN-C973-86	Michael Galvin	Individual	
FIN-C973-87	Laura Bent	Individual	
FIN-C973-88	Patrick Dinu	Individual	
FIN-C973-89	Cllr. Gavin Pepper	Individual	
FIN-C973-90	Adam Lovett	Individual	
FIN-C973-91	Brendan Spillane	Individual	
FIN-C973-92	Jerome W	Individual	
FIN-C973-93	Andrew Desborough	Individual	
FIN-C973-94	David Kernan	Individual	
FIN-C973-95	Cathrina Hyland	Individual	
FIN-C973-96	Grace Grimes	Individual	
FIN-C973-97	Fiona Treanor	Individual	
FIN-C973-98	Shaz Hutch	Individual	
FIN-C973-99	Una Raeside	Individual	
FIN-C973-100	Josh Kelly	Individual	
FIN-C973-101	Erin McDonnell	Individual	
FIN-C973-102	Ciaran Gilmartin	Individual	
FIN-C973-103	Will Briscoe	Individual	
FIN-C973-104	Andrew Treacy	Individual	
FIN-C973-105	Keith Kidd	Individual	
FIN-C973-106	Thomas Finn	Individual	
FIN-C973-107	Shannon O'Neill	Individual	
FIN-C973-108	Melissa Carter	Individual	
FIN-C973-109	Transport Infrastructure Ireland	Organisation	
FIN-C973-110	Lee Hughes-Martin	Individual	
FIN-C973-111	Ricardas Varnelis	Individual	

FIN-C973-112	Mark Lucas	Individual	
FIN-C973-113	Jodie Hyland	Individual	
FIN-C973-114	Michelle Tobin	Individual	
FIN-C973-115	Keith Groves	Individual	
FIN-C973-116	Nora Kennedy	Individual	
FIN-C973-117	Rachel Ward	Individual	
FIN-C973-118	Darragh Moorhouse	Individual	
FIN-C973-119	Anita Coleman	Individual	
FIN-C973-120	Fergus De Brún	Individual	
FIN-C973-121	Robert Murphy	Individual	
FIN-C973-122	Shane Foley	Individual	
FIN-C973-123	Gillian Gilchrist	Individual	
FIN-C973-124	Linda Emmett	Individual	
FIN-C973-125	Martin O'Connor	Individual	
FIN-C973-126	Tina Lyons	Individual	
FIN-C973-127	Debra Kearns	Individual	
FIN-C973-128	Albert O'Callaghan	Individual	
FIN-C973-129	Noreen Power	Individual	
FIN-C973-130	Michael Kelly	Individual	
FIN-C973-131	Eamonn Lynch	Individual	
FIN-C973-132	John Harrison	Individual	
FIN-C973-133	Erin McDonnell	Individual	

FIN-C973-134	Josh Kelly	Individual	
FIN-C973-135	Leon Bradley	Individual	
FIN-C973-136	Ann O'Reilly	Individual	
FIN-C973-137	Imelda O Reilly	Individual	
FIN-C973-138	Graham Milne	Individual	
FIN-C973-139	Abby McDonagh	Individual	
FIN-C973-140	Marcelo Queiroz	Individual	
FIN-C973-141	Brenda Keane	Individual	
FIN-C973-142	Ann Marie Hennelly	Individual	
FIN-C973-143	Laticia Galligan	Individual	
FIN-C973-144	Sean Butler	Individual	
FIN-C973-145	Jade McDonnell	Individual	
FIN-C973-146	Sinn Féin	Organisation	Dessie Ellis TD, Cllr. Anthony Connaghan & Cllr. Leslie Kane
FIN-C973-147	Cliff O Neill	Individual	
FIN-C973-148	Pamela Carrie	Individual	
FIN-C973-149	Ann Hyland	Individual	
FIN-C973-150	Jason McElroy	Individual	
FIN-C973-151	Mark Carey	Individual	
FIN-C973-152	James Reilly	Individual	
FIN-C973-153	Bernie Browne	Individual	
FIN-C973-154	Mark Grimes	Individual	

FIN-C973-155	Marie Ray	Individual	
FIN-C973-156	Carolann McMahon	Individual	
FIN-C973-157	Fliona Fogarty	Individual	
FIN-C973-158	Shaz Hutch	Individual	
FIN-C973-159	Tara Hutch	Individual	
FIN-C973-160	Sharon Conroy	Individual	
FIN-C973-161	Leanne Dunne	Individual	
FIN-C973-162	Desmond Walsh	Individual	
FIN-C973-163	Derek Freney	Individual	
FIN-C973-164	Louise Baker	Individual	
FIN-C973-165	Patrick O Beirne	Individual	
FIN-C973-166	Cllr. Anthony Connaghan	Individual	
FIN-C973-167	Jennifer Brereton	Individual	
FIN-C973-168	Royal Canal Park Community Association	Organisation	
FIN-C973-169	Stacey Ridgeway	Individual	
FIN-C973-170	James Louttit	Individual	175th Castleknock Scout Group
FIN-C973-171	St Brendan's GAA	Organisation	
FIN-C973-172	Karen Kearney	Individual	
FIN-C973-173	Lynne Ryan	Individual	
FIN-C973-174	Davin Richardson	Individual	
FIN-C973-175	Shane Ashmore	Individual	
FIN-C973-176	Laura Hazel	Individual	

FIN-C973-177	Dean O'Kelly	Individual	
FIN-C973-178	Sarah Purcell	Individual	
FIN-C973-179	Derek Smith	Individual	
FIN-C973-180	Karen Murphy	Individual	
FIN-C973-181	Matt Treacy	Individual	
FIN-C973-182	DK Planning Ltd	Organisation	National Orthopaedic Hospital Cappagh
FIN-C973-183	Shauna Fay	Individual	
FIN-C973-184	Declan Moloney	Individual	
FIN-C973-185	Yuno Energy	Organisation	
FIN-C973-186	Armagh Observatory and Planetarium	Organisation	Astronomical Observatories of Ireland
FIN-C973-187	Rosaleen Kidd	Individual	
FIN-C973-188	Laura Dunne	Individual	
FIN-C973-189	Stella Tuite	Individual	
FIN-C973-190	Rose Tuite	Individual	
FIN-C973-191	Lynn Kinch	Individual	
FIN-C973-192	Dylan Kinch	Individual	
FIN-C973-193	Niamh Kinch	Individual	
FIN-C973-194	Kadie Martin	Individual	
FIN-C973-195	William Kinch	Individual	
FIN-C973-196	Robyn Kelly	Individual	
FIN-C973-197	Kian Dwyer	Individual	

FIN-C973-198	Kelvin Hilliard	Individual	
FIN-C973-199	Darren Graham	Individual	
FIN-C973-200	Aoife Heffernan	Individual	
FIN-C973-201	Gary Kelly	Individual	
FIN-C973-202	Annemarie Dwyer	Individual	
FIN-C973-203	Sean Mooney	Individual	
FIN-C973-204	Wesley Murphy	Individual	
FIN-C973-205	Barbara Brien	Individual	
FIN-C973-206	Martin Brien	Individual	
FIN-C973-207	Antoinette McMahon	Individual	
FIN-C973-208	Dianne Allen	Individual	
FIN-C973-209	Donna Allen	Individual	
FIN-C973-210	Callum Kearney	Individual	
FIN-C973-211	Lisa Valentine	Individual	
FIN-C973-212	Susan O Beirne	Individual	
FIN-C973-213	Marzena Ksiazek	Individual	
FIN-C973-214	Francis Kelly	Individual	
FIN-C973-215	Karl O'Toole	Individual	
FIN-C973-216	Brian Daly	Individual	
FIN-C973-217	Lynne Dowley	Individual	
FIN-C973-218	Liam Redmond	Individual	
FIN-C973-219	Elaine Dalton	Individual	

FIN-C973-220	Nicola Colfer	Individual	
FIN-C973-221	Tom Thompson	Individual	
FIN-C973-222	Sharon Reddy	Individual	
FIN-C973-223	Lucia Ricardin	Individual	
FIN-C973-224	Damien Dowling	Individual	
FIN-C973-225	Marie Mooney	Individual	
FIN-C973-226	Susan O'Neill	Individual	
FIN-C973-227	Jordan Kerin	Individual	
FIN-C973-228	Fred Kinch	Individual	
FIN-C973-229	Kristina Cregan	Individual	
FIN-C973-230	Amy O'Brien	Individual	
FIN-C973-231	Office of Public Works	Organisation	
FIN-C973-232	Department of Climate, Energy and the Environment	Organisation	Geological Survey Ireland
FIN-C973-233	Susan Byrne	Individual	
FIN-C973-234	Colm MacSuibhne	Individual	
FIN-C973-235	Joe Stokes	Individual	
FIN-C973-236	St. Brigid's GAA Club	Organisation	
FIN-C973-237	Leeann Deegan	Individual	
FIN-C973-238	Gareth Martin	Individual	
FIN-C973-239	Damien Sheridan	Individual	
FIN-C973-240	Gail richardson	Individual	
FIN-C973-241	Treasa Fagan	Individual	

FIN-C973-242	Niamh Lambert	Individual	
FIN-C973-243	David Kellegher	Individual	
FIN-C973-244	Alan Fagan	Individual	
FIN-C973-245	Natalie Kiernan	Individual	
FIN-C973-246	Robyn Myna	Individual	
FIN-C973-247	Denise Kearney	Individual	
FIN-C973-248	Wayne Mulligan	Individual	
FIN-C973-249	Caitlin Lanigan	Individual	
FIN-C973-250	Elmgreen Golf Club	Organisation	
FIN-C973-251	David Geraghty	Individual	
FIN-C973-252	Philippe Thirroueiz	Individual	
FIN-C973-253	Keith Mooney	Individual	
FIN-C973-254	Ray O'Kelly	Individual	
FIN-C973-255	Darren Russell	Individual	
FIN-C973-256	Adam Murphy	Individual	
FIN-C973-257	Conaill O Ceallaigh	Individual	
FIN-C973-258	John O Neill	Individual	
FIN-C973-259	Charlie Horkan	Individual	
FIN-C973-260	Aidan Maher	Individual	
FIN-C973-261	Ben Murphy	Individual	
FIN-C973-262	John Elliott	Individual	
FIN-C973-263	Frank Aherne	Individual	

FIN-C973-264	Eoghan O'Donovan	Individual	
FIN-C973-265	Norman Kelly	Individual	
FIN-C973-266	John Tinsley	Individual	
FIN-C973-267	St Josephs Horse and Pony	Organisation	
FIN-C973-268	David Mulready	Individual	
FIN-C973-269	Alan Waters	Individual	
FIN-C973-270	Martin Connolly	Individual	
FIN-C973-271	Alan Keane	Individual	
FIN-C973-272	Scribblestown Residents Association	Organisation	
FIN-C973-273	Cormac Molloy	Individual	
FIN-C973-274	David Power	Individual	
FIN-C973-275	Michael Reidy	Individual	
FIN-C973-276	Lucille Sheehy	Individual	
FIN-C973-277	Hendri Booysen	Individual	
FIN-C973-278	John Reddy	Individual	
FIN-C973-279	Sarah Byrne	Individual	
FIN-C973-280	Alana May Ridgeway	Individual	
FIN-C973-281	Laura Dunne	Individual	
FIN-C973-282	Stiofan MacDonncha	Individual	
FIN-C973-283	Peter Moran	Individual	
FIN-C973-284	Sam Lord	Individual	
FIN-C973-285	Craig McDonagh	Individual	

FIN-C973-286	Richard Kelly	Individual	
FIN-C973-287	Elaine Kelly	Individual	
FIN-C973-288	Elm Green Golf Club	Organisation	
FIN-C973-289	Dublin Institute of Advanced Studies	Organisation	
FIN-C973-290	Peter McKiernan	Individual	
FIN-C973-291	Cllr Keith Connolly	Individual	
FIN-C973-292	Donald O'Brien	Individual	
FIN-C973-293	Christina Whelan	Individual	
FIN-C973-294	Rachel O'Connell	Individual	
FIN-C973-295	Larry Yawell	Individual	
FIN-C973-296	Jacqui Kinsella	Individual	
FIN-C973-297	Josh Grant	Individual	
FIN-C973-298	Daniel Hyland	Individual	
FIN-C973-299	Tracey Hutton	Individual	
FIN-C973-300	Rolandas Vizbara	Individual	
FIN-C973-301	Larry Kavanagh	Individual	
FIN-C973-302	Marian Mc Cluskey	Individual	
FIN-C973-303	Patricia Horgan	Individual	
FIN-C973-304	Tara McEneaney	Individual	
FIN-C973-305	Abbey McMahon	Individual	
FIN-C973-306	Ian Trimble	Individual	
FIN-C973-307	Jolene Mooney	Individual	

FIN-C973-308	Natasha Beldi	Organisation	
FIN-C973-309	Felix McCann	Individual	
FIN-C973-310	Paddy Dunne	Organisation	
FIN-C973-311	Graham Sweeney	Individual	
FIN-C973-312	David Donovan	Individual	
FIN-C973-313	Rachid Beldi	Organisation	
FIN-C973-314	Paul Bohan	Individual	
FIN-C973-315	Joseph Turner	Individual	
FIN-C973-316	Freda Oneill	Individual	
FIN-C973-317	Shane McEneaney	Individual	
FIN-C973-318	Tara Hutch	Individual	
FIN-C973-319	Morgan Lambert	Individual	
FIN-C973-320	David Curran	Individual	
FIN-C973-321	Lorcan Sheehan	Individual	
FIN-C973-322	Stephen Kelly	Individual	
FIN-C973-323	Peter Fay	Individual	
FIN-C973-324	Liz White	Individual	
FIN-C973-325	Glen Fowler Fowler	Individual	
FIN-C973-326	Noel White	Individual	
FIN-C973-327	Angela Treacy	Individual	
FIN-C973-328	Zack Brennan	Individual	
FIN-C973-329	Brendan O'Rourke	Individual	

FIN-C973-330	Colette Roche	Individual	
FIN-C973-331	Patrick Rogers	Individual	
FIN-C973-332	BMA Planning	organisation	Flynn & O'Flaherty Construction
FIN-C973-333	BMA Planning	organisation	Smorgs Property Holdings Ltd.
FIN-C973-334	Terrie Scurry	Individual	
FIN-C973-335	Linda Redmond	Individual	
FIN-C973-336	Joshua Magee	Individual	
FIN-C973-337	Teagasc	Organisation	
FIN-C973-338	Suzanne Phelan	Individual	
FIN-C973-339	Seamus Cowman	Individual	
FIN-C973-340	Jim Feary	Individual	
FIN-C973-341	Indira Usenbaeva	Individual	
FIN-C973-342	Mary Ridgeway	Individual	
FIN-C973-343	An Post	Organisation	
FIN-C973-344	Jason Cunningham	Individual	
FIN-C973-345	Michael Hall	Individual	
FIN-C973-346	Aine McEneaney	Individual	
FIN-C973-347	Tesco Ireland	Organisation	
FIN-C973-348	Gar Herbert	Individual	
FIN-C973-349	Yvonne Keaveney	Individual	
FIN-C973-350	Amy Pepper	Individual	
FIN-C973-351	Planning, Property & Economic Development	Organisation	

	Department, Dublin City Council		
FIN-C973-352	Paul McAuliffe TD	Individual	
FIN-C973-353	Peter Carroll	Individual	
FIN-C973-354	Elaine Fogarty	Individual	
FIN-C973-355	Éimear O'Flynn	Individual	
FIN-C973-356	Philomena Byrne Murphy	Individual	
FIN-C973-357	Armstrong Planning Ltd	Organisation	Dublin Grass Machinery
FIN-C973-358	Uisce Éireann	Organisation	
FIN-C973-359	Mujeebur Awan	Individual	
FIN-C973-360	Jim Brogan	Individual	Cumann Luthcleas Gael Coiste Átha Cliath (Dublin G.A.A County Board)
FIN-C973-361	Alexander Ignatiev	Individual	
FIN-C973-362	Mark Lord	Individual	
FIN-C973-363	Frances Coldrick	Individual	
FIN-C973-364	Jane Killoch	Individual	
FIN-C973-365	Deirdre McInerney	Individual	
FIN-C973-366	James McCluskey Lambert	Individual	
FIN-C973-367	Mark McGuinness	Individual	
FIN-C973-368	Kevin Nolan	Individual	
FIN-C973-369	Fergal Collins	Individual	
FIN-C973-370	Tommie Mc Manus	Individual	

FIN-C973-371	Dolores Brady	Individual	
FIN-C973-372	Samantha Kelly	Individual	
FIN-C973-373	Colette Brady	Individual	
FIN-C973-374	Jonathan Walsh	Individual	
FIN-C973-375	Anna Lalor	Individual	
FIN-C973-376	Patrick Coyne	Individual	
FIN-C973-377	Solange Meucci Dornan	Individual	
FIN-C973-378	Richard Dornan	Individual	
FIN-C973-379	Coolmine Rugby Football Club (RFC)	Organisation	
FIN-C973-380	Artur Dermenji	Individual	
FIN-C973-381	Nicola Mooney Dowling	Individual	
FIN-C973-382	Cillian Martin	Individual	
FIN-C973-383	Ciaran Harrison	Individual	
FIN-C973-384	Mary Walsh	Individual	
FIN-C973-385	Padraig Flanagan	Individual	
FIN-C973-386	Rory Farrell	Individual	
FIN-C973-387	Louis Parminter	Individual	
FIN-C973-388	Cyrielle De Baets	Individual	
FIN-C973-389	Sorcha Keane	Individual	
FIN-C973-390	Paul Dooley	Individual	
FIN-C973-391	Grainne Healy	Individual	
FIN-C973-392	Richard Grimmett	Individual	

FIN-C973-393	Raymond Renaghan	Individual	
FIN-C973-394	Taciane Alegra	Individual	
FIN-C973-395	Liam Lanigan	Individual	
FIN-C973-396	Alan Chiswick	Individual	
FIN-C973-397	Eamonn Connelly	Individual	
FIN-C973-398	Ross Metcalfe	Individual	
FIN-C973-399	Oliver Prunty	Individual	
FIN-C973-400	John McDonnell	Individual	
FIN-C973-401	Jamie Starrs	Individual	
FIN-C973-402	Anne Xavier	Individual	
FIN-C973-403	Kevin Gleeson	Individual	
FIN-C973-404	Edward Mac Manus	Individual	
FIN-C973-405	Andres Perez Morales	Individual	
FIN-C973-406	Rachel Starrs	Individual	
FIN-C973-407	Robert Gilbert	Individual	
FIN-C973-408	Tom Dillane	Individual	
FIN-C973-409	Megan Cukur	Individual	
FIN-C973-410	Brian Blaney	Individual	
FIN-C973-411	Catherine Mullen	Individual	
FIN-C973-412	Layla de Cogan Chin	Individual	
FIN-C973-413	Patrick Starrs	Individual	
FIN-C973-414	Brian Farrell	Individual	

FIN-C973-415	Aaron O'Callaghan	Individual	
FIN-C973-416	Sarah Connelly	Individual	
FIN-C973-417	Barry Murphy	Individual	
FIN-C973-418	Jan Markmann	Individual	
FIN-C973-419	John O'Brien	Individual	
FIN-C973-420	Brian Carey	Individual	
FIN-C973-421	Jennifer Atkinson	Individual	
FIN-C973-422	Brian Carey	Individual	
FIN-C973-423	Ciaran McDonnell	Individual	
FIN-C973-424	Charlie Canavan	Individual	
FIN-C973-425	Louise Farrell	Individual	
FIN-C973-426	Ciarán Moore	Individual	
FIN-C973-427	Shane Gleeson	Individual	
FIN-C973-428	Eric Mitchell	Individual	
FIN-C973-429	Cllr. Gayle Ralph	Individual	
FIN-C973-430	John Monaghan	Individual	
FIN-C973-431	Deirdre Canavan	Individual	
FIN-C973-432	Richard Bonney	Individual	
FIN-C973-433	Mark Donnelly	Individual	
FIN-C973-434	Patrick Sheehan	Individual	
FIN-C973-435	Kenneth Watson	Individual	
FIN-C973-436	Irish Georgian Society	Organisation	

FIN-C973-437	Mary Kelly	Individual	
FIN-C973-438	Harry Keogh	Individual	
FIN-C973-439	Mary Corcoran	Individual	
FIN-C973-440	Ciaran Troy	Individual	
FIN-C973-441	Ruth Matthews	Individual	
FIN-C973-442	Barry Dennehy	Individual	
FIN-C973-443	Niall Farrell	Individual	
FIN-C973-444	Colman O'Loughlin	Individual	
FIN-C973-445	Dave Toole	Individual	
FIN-C973-446	Tom Dinneen	Individual	
FIN-C973-447	Kirsty Starrs	Individual	
FIN-C973-448	Rocco Lupoi	Individual	
FIN-C973-449	Danny Keohane	Individual	
FIN-C973-450	Steven O'Brien	Individual	
FIN-C973-451	Bernie Doherty	Individual	
FIN-C973-452	Maeve Morrissey	Individual	
FIN-C973-453	Maria McDonnell	Individual	
FIN-C973-454	Land Development Agency (LDA)	Organisation	
FIN-C973-455	National Transport Authority	Organisation	
FIN-C973-456	Matthew Grogan	Individual	
FIN-C973-457	Ian Bane	Individual	
FIN-C973-458	Ciarán Ó Conghaile	Individual	

FIN-C973-459	Karen Rath	Individual	
FIN-C973-460	Greg Stafford	Individual	
FIN-C973-461	Codema	Organisation	
FIN-C973-462	Darragh Gogarty	Individual	
FIN-C973-463	Barry Sherlock	Individual	
FIN-C973-464	Dublin Northwest Partnership	Organisation	
FIN-C973-465	Ruth Walsh	Individual	
FIN-C973-466	Leslie Lennox	Individual	
FIN-C973-467	Aaron Dillon	Individual	
FIN-C973-468	Garreth Tierney	Individual	
FIN-C973-469	Department of Education and Youth	Organisation	
FIN-C973-470	Marcus Seoigh	Individual	
FIN-C973-471	Patricia Caulfield	Individual	
FIN-C973-472	John Whitty	Individual	
FIN-C973-473	Emmet Browne	Individual	
FIN-C973-474	Scott Fealy	Individual	
FIN-C973-475	Reddy Architecture + Urbanism	Organisation	
FIN-C973-476	Philip McEvitt	Individual	
FIN-C973-477	Aidríán O'Armais	Individual	
FIN-C973-478	Pavlo Dyachenko	Individual	
FIN-C973-479	John Barrett	Individual	
FIN-C973-480	Ciara O'Brien	Individual	

FIN-C973-481	James Kennedy	Individual	
FIN-C973-482	Aidan Kelly	Individual	
FIN-C973-483	Noel Stenson	Individual	
FIN-C973-484	Edel Clarke	Individual	
FIN-C973-485	Shane Cassidy	Individual	
FIN-C973-486	Adam Carmody	Individual	
FIN-C973-487	David Barton Community Campaigner	Individual	
FIN-C973-488	Iveta Feldmane	Individual	
FIN-C973-489	Irish Cycling Campaign	Organisation	
FIN-C973-490	Cormac Reilly	Individual	
FIN-C973-491	Cllr. Siobhan Shovlin & Emer Currie TD	Individual	
FIN-C973-492	Roisin Ni Cheallaigh	Individual	
FIN-C973-493	John Smith	Individual	
FIN-C973-494	Anthony Harland	Individual	
FIN-C973-495	Nicola Murray	Individual	
FIN-C973-496	Robert Keogh	Individual	
FIN-C973-497	David Lynam	Individual	
FIN-C973-498	Ciaran Caverly	Individual	
FIN-C973-499	Leanne Higgins	Individual	
FIN-C973-500	Karen Edmonds	Individual	
FIN-C973-501	Sandra Brennan	Individual	
FIN-C973-502	Daniel McGing	Individual	

FIN-C973-503	Marcus Reid	Individual	
FIN-C973-504	Mary McCamley	Individual	
FIN-C973-505	Craig Dunne	Individual	
FIN-C973-506	Cillian Long	Individual	
FIN-C973-507	David Cotter	Individual	
FIN-C973-508	Rita Mimmagh Lambert	Individual	
FIN-C973-509	Beatrice Bowers	Individual	
FIN-C973-510	Nóirín Boland	Individual	
FIN-C973-511	Katie Dunne	Individual	
FIN-C973-512	Claire McDermott	Individual	
FIN-C973-513	Michael Grogan	Individual	
FIN-C973-514	Carmel Grogan	Individual	
FIN-C973-515	Gillian Ennis	Individual	
FIN-C973-516	Stephen Carroll	Individual	
FIN-C973-517	Adrian Leddy	Individual	
FIN-C973-518	Strength-2-Strength	Organisation	
FIN-C973-519	Brian Moloney	Individual	
FIN-C973-520	Natalie Cooney	Individual	
FIN-C973-521	Mark Higgins	Individual	
FIN-C973-522	Georgina Maddox	Individual	
FIN-C973-523	Teresa Stenson	Individual	
FIN-C973-524	Derek McMenamin	Individual	

FIN-C973-525	Tony Bridgeman	Individual	Phoenix Football Club
FIN-C973-526	Yvonne Devlin	Individual	
FIN-C973-527	Harry Peake	Individual	
FIN-C973-528	Greg Culhane	Individual	
FIN-C973-529	Avril Tierney	Individual	
FIN-C973-530	Darren Kane	Individual	
FIN-C973-531	Thomas Connolly	Individual	
FIN-C973-532	Allen Nuzum	Individual	
FIN-C973-533	Deirdre Grimmett	Individual	
FIN-C973-534	Office of Public Works	Organisation	
FIN-C973-535	Sport Ireland	Organisation	
FIN-C973-536	Corin Bridson	Individual	
FIN-C973-537	EPA	Organisation	
FIN-C973-538	Stephen O'Rourke	Individual	
FIN-C973-539	Ciara Kenny	Individual	
FIN-C973-540	Nika Micek	Individual	
FIN-C973-541	Darina O Flanagan	Individual	
FIN-C973-542	Eileen Joyce	Individual	
FIN-C973-543	Denise Nolan	Individual	
FIN-C973-544	S. Mceneaney	Individual	
FIN-C973-545	Keith Noone	Individual	
FIN-C973-546	Elmgreen Ladies Golf Club	Organisation	

FIN-C973-547	Colin O'Shea	Individual	
FIN-C973-548	Carol Nitoi	Individual	
FIN-C973-549	Aileen Donegan	Individual	
FIN-C973-550	Sandra Kenny	Individual	
FIN-C973-551	D. Herbert	Individual	
FIN-C973-552	Allison Rooney	Individual	
FIN-C973-553	Cllr Ted Leddy	Individual	
FIN-C973-554	Edgar Kerr	Individual	
FIN-C973-555	Agnes Kenny	Individual	
FIN-C973-556	Clare Rudden	Individual	
FIN-C973-557	Przemyslaw Kaczmarczyk	Individual	
FIN-C973-558	Department of Transport	Organisation	
FIN-C973-559	Mary Jo Leatham	Individual	
FIN-C973-560	Stephen Connor	Individual	
FIN-C973-561	Agnieszka Wiesyk	Individual	
FIN-C973-562	Tanya Quinn	Individual	
FIN-C973-563	Colette McEvoy	Individual	
FIN-C973-564	McGill Planning	Organisation	Jane Donnelly
FIN-C973-565	Mary Largey	Individual	
FIN-C973-566	patricia rutledge	Individual	
FIN-C973-567	J. Brennan	Individual	
FIN-C973-568	Helen Johnston	Individual	

FIN-C973-569	Simon Gibson	Individual	
FIN-C973-570	Ed Martin	Individual	
FIN-C973-571	Judy Vahey	Individual	
FIN-C973-572	Rebecca Curry	Individual	
FIN-C973-573	Shaun Fahey	Individual	
FIN-C973-574	Anita Taite	Individual	
FIN-C973-575	Iarnród Éireann / Irish Rail	Organisation	
FIN-C973-576	Nora Rahill	Individual	
FIN-C973-577	The Heritage Council	Organisation	
FIN-C973-578	Gerard Kelly	Individual	
FIN-C973-579	Kieran Byrne	Individual	
FIN-C973-580	Renata Szumlanska	Individual	
FIN-C973-581	Adrian Charles	Individual	
FIN-C973-582	Carl Duffy	Individual	
FIN-C973-583	Jack Price	Individual	
FIN-C973-584	Fintan Guihen	Individual	
FIN-C973-585	John Keel	Individual	
FIN-C973-586	Kathy Sheridan	Individual	
FIN-C973-587	Aoife Graham	Individual	
FIN-C973-588	John Cagney	Individual	
FIN-C973-589	Declan Mescall	Individual	
FIN-C973-590	Neil Feeney	Individual	

FIN-C973-591	JSA Planning	Organisation	Glenveagh Properties Ltd.
FIN-C973-592	ESB	Organisation	
FIN-C973-593	Sarah Weldon	Individual	
FIN-C973-594	Damien Maury	Individual	
FIN-C973-595	Fintan Brown	Individual	
FIN-C973-596	Breda Hayes	Individual	
FIN-C973-597	Tim O'Keeffe	Individual	
FIN-C973-598	Michael Phillips	Individual	
FIN-C973-599	Colin Kenny	Individual	
FIN-C973-600	Ciaran Lanigan	Individual	
FIN-C973-601	Mark Boyle	Individual	
FIN-C973-602	Brad Eck	Individual	
FIN-C973-603	Roisin Whitty	Individual	
FIN-C973-604	Fred Hickey	Individual	
FIN-C973-605	Andrew Wood	Individual	
FIN-C973-606	Office of the Planning Regulator	Organisation	
FIN-C973-607	Shaun Quinn	Individual	
FIN-C973-608	Bernard Jarvis	Individual	
FIN-C973-609	Donal Garrihy	Individual	
FIN-C973-610	Fiona Maguire	Individual	
FIN-C973-611	Wild Ireland Defence CLG	Organisation	
FIN-C973-612	Charles Kurtz	Individual	

FIN-C973-613	Matthew Garrihy	Individual	
FIN-C973-614	Michael Russell	Individual	
FIN-C973-615	Gavin Nolan	Individual	
FIN-C973-616	Patrick Kelly	Individual	
FIN-C973-617	Damien Bates	Individual	
FIN-C973-618	Nelu Porubin	Individual	
FIN-C973-619	Laurence Pollard	Individual	
FIN-C973-620	Michael Bermingham	Individual	
FIN-C973-621	Cllr Conor Reddy	Individual	
FIN-C973-622	Noreen Harrison	Individual	
FIN-C973-623	Paul Caffrey	Individual	
FIN-C973-624	Neil Dowling	Individual	
FIN-C973-625	Helena Malone	Individual	
FIN-C973-626	Gráinne Lambert	Individual	
FIN-C973-627	John Burtchaell	Individual	Ruth Coppinger TD, Cllr John Burthchaell, Cllr Helen Redwood
FIN-C973-628	Shane Delaney	Individual	
FIN-C973-629	Vivienne O'Leary	Individual	
FIN-C973-630	Jon Kelly	Individual	
FIN-C973-631	Ken Doherty	Individual	
FIN-C973-632	Daragh O'Connor	Individual	
FIN-C973-633	Ken Clarke	Individual	

FIN-C973-634	Tom Geraghty	Individual	
FIN-C973-635	Emma Cummins	Individual	
FIN-C973-636	Patricia Sheehan	Individual	
FIN-C973-637	Kathleen Bridson	Individual	
FIN-C973-638	Sean Ryan	Individual	
FIN-C973-639	Nicole Beatty	Individual	
FIN-C973-640	Martin Toomey	Individual	
FIN-C973-641	Cinthya Oliveira McManus	Individual	
FIN-C973-642	Jim Malone	Individual	
FIN-C973-643	Susan McCann	Individual	
FIN-C973-644	Yvonne Donaghy	Individual	
FIN-C973-645	Dublin West Sinn Féin	Organisation	Paul Donnelly TD, Cllr Angela Donnelly, Cllr Breda Hanaphy
FIN-C973-646	Eamon Farrelly	Individual	
FIN-C973-647	Stephen Lyons	Individual	
FIN-C973-648	Ronan Clerkin	Individual	
FIN-C973-649	Liam Murphy	Individual	
FIN-C973-650	Eoin Cahalan	Individual	
FIN-C973-651	Timmy Kenna	Individual	
FIN-C973-652	Peter wheatley	Individual	
FIN-C973-653	Orla Kelly	Individual	
FIN-C973-654	Tito Livio Pereira da Cruz	Individual	

FIN-C973-655	Niamh Holly	Individual	
FIN-C973-656	Josephine Ryan	Individual	
FIN-C973-657	Michael Conway	Individual	
FIN-C973-658	Martin Hoey	Individual	
FIN-C973-659	Laura & Michael K	Individual	
FIN-C973-660	Frank Colgan	Individual	
FIN-C973-661	Geraldine Bermingham	Individual	
FIN-C973-662	Cathy Bresnan	Individual	
FIN-C973-663	Cllr. Mary Callaghan	Individual	
FIN-C973-664	Dermot Dooley	Individual	
FIN-C973-665	Department of Housing, Local Government and Heritage	Organisation	
FIN-C973-666	Conor O Keeffe	Individual	
FIN-C973-667	Ruairí Ó Dúlaing	Individual	
FIN-C973-668	Gavin Power	Individual	
FIN-C973-669	Kate ONeill	Individual	
FIN-C973-670	Marie Cullen	Individual	
FIN-C973-671	Kieran Moloney	Individual	
FIN-C973-672	Sayonara Lemanski	Individual	
FIN-C973-673	Ruth Moloney	Individual	
FIN-C973-674	Tom McGrath	Individual	
FIN-C973-675	Lilian Charles	Individual	
FIN-C973-676	Leisha McDonald	Individual	

FIN-C973-677	Josh Byrne	Individual	
FIN-C973-678	Property Industry Ireland	Organisation	
FIN-C973-679	Jan Walker	Individual	
FIN-C973-680	Emma Fitzpatrick	Individual	
FIN-C973-681	Kairit Neiland	Individual	
FIN-C973-682	Stephen Little and Associates Planning & Development Consultants	Organisation	Castlethorn
FIN-C973-683	Danielle O' Reilly	Individual	
FIN-C973-684	Martin Sneyd	Individual	
FIN-C973-685	Mary Moloney	Individual	
FIN-C973-686	Martin O Gara	Individual	
FIN-C973-687	Finglas Biodiversity Action Group	Organisation	
FIN-C973-688	D McMahon	Individual	
FIN-C973-689	Riona Finn	Individual	
FIN-C973-690	Andrew Lane	Individual	
FIN-C973-691	Morgana Lemanski	Individual	
FIN-C973-692	Allyson Lambert	Individual	
FIN-C973-693	Oran Farrell	Individual	
FIN-C973-694	David Lynch	Individual	
FIN-C973-695	Treasa McVeigh	Individual	
FIN-C973-696	Cllr. David Healy	Staff member	
FIN-C973-697	St. Oliver Plunkett Eoghan Ruadh GAA Club	Organisation	
FIN-C973-698	James Ruxton	Individual	

FIN-C973-699	Cllr. Gerard Sheehan	Individual	
FIN-C973-700	Ann Donovan	Individual	
FIN-C973-701	Rathborne Community Association	Organisation	
FIN-C973-702	St. Oliver Plunkett Eoghan Ruadh GAA Club	Organisation	
FIN-C973-703	Mark Coulter	Individual	
FIN-C973-704	Daithi O'Brien	Individual	
FIN-C973-705	Rory Hearne TD	Individual	
FIN-C973-706	Jason Morris	Individual	
FIN-C973-707	Orlagh Wilson	Individual	
FIN-C973-708	Robyn Barkey	Individual	
FIN-C973-709	Elizabeth Gageby Bell	Individual	
FIN-C973-710	Corey Mc Grath	Individual	
FIN-C973-711	Stephen Davis	Individual	
FIN-C973-712	Caroline Conroy	Individual	
FIN-C973-713	Eamonn & Aileen Connelly	Individual	
FIN-C973-714	Hannah Connelly	Individual	
FIN-C973-715	Helen Kelliher	Individual	
FIN-C973-716	Eugene O'Reilly	Individual	
FIN-C973-717	Cllr John Walsh	Individual	
FIN-C973-718	Pat the Goat	Individual	
FIN-C973-719	Pauline Ray	Individual	
FIN-C973-720	Chud Thompson	Individual	

FIN-C973-721	Shane Flanagan	Individual	
FIN-C973-722	Aileen Connelly	Individual	Eamonn Connelly
FIN-C973-723	Aaron Hand	Individual	
FIN-C973-724	Abbie Foster	Individual	
FIN-C973-725	Abbie Purcell	Individual	
FIN-C973-726	Aidan Doyle	Individual	
FIN-C973-727	Aidan Lawlor	Individual	
FIN-C973-728	Adrianna Belive	Individual	
FIN-C973-729	Avril Brady	Individual	
FIN-C973-730	Alan Devereux	Individual	
FIN-C973-731	Alex Churchard	Individual	
FIN-C973-732	Alan McKenna	Individual	
FIN-C973-733	Alex Kavanagh	Individual	
FIN-C973-734	Alison Connolly	Individual	
FIN-C973-735	Amanda Keogh	Individual	
FIN-C973-736	Amy McGivney	Individual	
FIN-C973-737	Andrea Power Treacy	Individual	
FIN-C973-738	Alan Ward	Individual	
FIN-C973-739	Anita McAuley	Individual	
FIN-C973-740	Anna Wang	Individual	
FIN-C973-741	Anthony Donovan	Individual	
FIN-C973-742	Anthony Hand	Individual	

FIN-C973-743	Anthony McDonell	Individual	
FIN-C973-744	Alex Hughes	Individual	
FIN-C973-745	Aoife Connolly	Individual	
FIN-C973-746	Alycia Ward	Individual	
FIN-C973-747	Ari Carrroll	Individual	
FIN-C973-748	Armend Devoy	Individual	
FIN-C973-749	Amanda Doran	Individual	
FIN-C973-750	Armondo John Demy	Individual	
FIN-C973-751	Amanda Doyle	Individual	
FIN-C973-752	Amber Smith	Individual	
FIN-C973-753	Amy Phelan	Individual	
FIN-C973-754	Andrew & Sharon Byrne	Individual	
FIN-C973-755	Astrid Green	Individual	
FIN-C973-756	Andrew Hosey	Individual	
FIN-C973-757	Andy Corrigan	Individual	
FIN-C973-758	Adam McAuley	Individual	
FIN-C973-759	Ann O'Connor	Individual	
FIN-C973-760	Anthony Keogh	Individual	
FIN-C973-761	Bronwyn Boland	Individual	
FIN-C973-762	Bronagh Leen	Individual	
FIN-C973-763	Breda Murray	Individual	
FIN-C973-764	Bobbi Flood	Individual	

FIN-C973-765	Bernadette Brown	Individual	
FIN-C973-766	Barbara Chaney	Individual	
FIN-C973-767	Anne Doran	Individual	
FIN-C973-768	Anne-Marie Troy	Individual	
FIN-C973-769	Anthony Dolan	Individual	
FIN-C973-770	Anthony Dwyer	Individual	
FIN-C973-771	Aoibh Fallon Cowan	Individual	
FIN-C973-772	Ashling O'Reilly	Individual	
FIN-C973-773	Audrey Jenkins	Individual	
FIN-C973-774	Carol Donovan	Individual	
FIN-C973-775	Catherine McCarthy	Individual	
FIN-C973-776	Cathrina Hyland	Individual	
FIN-C973-777	Cesove Marren	Individual	
FIN-C973-778	Chantel Kane	Individual	
FIN-C973-779	Charity Ocuchaba	Individual	
FIN-C973-780	Chris McCloskey	Individual	
FIN-C973-781	Bernard McGurney	Individual	
FIN-C973-782	Christine Beresford	Individual	
FIN-C973-783	Ciara Hyland	Individual	
FIN-C973-784	Betty Byrne	Individual	
FIN-C973-785	Ciara McCourt	Individual	
FIN-C973-786	Ciaran Robinson	Individual	

FIN-C973-787	Claire Byrne	Individual	
FIN-C973-788	Betty Darcy	Individual	
FIN-C973-789	Claire Foster	Individual	
FIN-C973-790	Claire Murtagh	Individual	
FIN-C973-791	Cllr Patrick Quinlan	Individual	
FIN-C973-792	Conor Naughton	Individual	
FIN-C973-793	Conor Savage	Individual	
FIN-C973-794	Cora Redmond	Individual	
FIN-C973-795	Corey McDonnell	Individual	
FIN-C973-796	Craig Doyle	Individual	
FIN-C973-797	Betty Maguire	Individual	
FIN-C973-798	Beverley Gannon	Individual	
FIN-C973-799	Brenda Gannon	Individual	
FIN-C973-800	Brigid Gannon	Individual	
FIN-C973-801	Camila Carneiro	Individual	
FIN-C973-802	Carol Conlon	Individual	
FIN-C973-803	Carol McGrath	Individual	
FIN-C973-804	Catherine Cukur	Individual	
FIN-C973-806	Catrione Lyons	Individual	
FIN-C973-807	Celine Bonney	Individual	
FIN-C973-808	Celine Gannon	Individual	
FIN-C973-809	Celine McKeever	Individual	

FIN-C973-810	Christopher Cassidy	Individual	
FIN-C973-811	Christopher McClaskey	Individual	
FIN-C973-812	Cian Kavanagh	Individual	
FIN-C973-813	Ciaran Gorman	Individual	
FIN-C973-814	Claire Robinson	Individual	
FIN-C973-815	Dalimda Todoran	Individual	
FIN-C973-816	Daniel Moran	Individual	
FIN-C973-817	Daniel O'Donnell	Individual	
FIN-C973-818	Daniel O'Donovan	Individual	
FIN-C973-819	Danielle Gill	Individual	
FIN-C973-820	Dave Moore	Individual	
FIN-C973-821	David Brady	Individual	
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FIN-C973-825	Debbie McDermott	Individual	
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FIN-C973-827	Deborah Cobbs	Individual	
FIN-C973-828	Deborah Robinson	Individual	
FIN-C973-829	Declan Troy	Individual	
FIN-C973-830	Deirdre Galvin	Individual	
FIN-C973-831	Demi Grimes	Individual	

FIN-C973-832	Derek Walsh	Individual	
FIN-C973-833	Derek Walsh	Individual	
FIN-C973-834	Des Churchard	Individual	
FIN-C973-835	Des Kane	Individual	
FIN-C973-836	Dolores Walsh	Individual	
FIN-C973-837	Dylan Murphy	Individual	
FIN-C973-838	Dylan Walsh	Individual	
FIN-C973-839	Elaine Kelly	Individual	
FIN-C973-840	Ellen Darcy	Individual	
FIN-C973-841	Ellen Troy	Individual	
FIN-C973-842	Evelyn Thompson	Individual	
FIN-C973-843	Freda Barnes	Individual	
FIN-C973-844	Francis Gannon Snr	Individual	
FIN-C973-845	Gary Dillon	Individual	
FIN-C973-846	Gary Lawlor	Individual	
FIN-C973-847	Geraldine McMahon	Individual	
FIN-C973-848	Gerard L	Individual	
FIN-C973-849	Gillian Cashel	Individual	
FIN-C973-850	Harriett Monaghan	Individual	
FIN-C973-851	Isabelle Hosey	Individual	
FIN-C973-852	Isabelle O'Donnell	Individual	
FIN-C973-853	Izabela Becloa	Individual	

FIN-C973-854	Jake Burns	Individual	
FIN-C973-855	Jamie Geraghty	Individual	
FIN-C973-856	Jason Elliott	Individual	
FIN-C973-857	Jason Gorman	Individual	
FIN-C973-858	Jason Kane	Individual	
FIN-C973-859	Jean O'Reilly	Individual	
FIN-C973-860	Jennie Fagan	Individual	
FIN-C973-861	Jessica Dwyer	Individual	
FIN-C973-862	Jessica Hogan	Individual	
FIN-C973-863	Jessica Walsh	Individual	
FIN-C973-864	Joanne Fulham	Individual	
FIN-C973-865	Joe Curran	Individual	
FIN-C973-866	John Hanney	Individual	
FIN-C973-867	John Kidd	Individual	
FIN-C973-868	John O'Neill	Individual	
FIN-C973-869	John Whelan	Individual	
FIN-C973-870	Josh Thompson	Individual	
FIN-C973-871	Kaja Belive	Individual	
FIN-C973-872	Keith Hosey	Individual	
FIN-C973-873	Keith Reynolds	Individual	
FIN-C973-874	Kelly Stafford	Individual	
FIN-C973-875	Kevin Walsh	Individual	

FIN-C973-876	Kim Kidd	Individual	
FIN-C973-877	Kyran Gorman	Individual	
FIN-C973-878	Laura Hughes	Individual	
FIN-C973-879	Leah Farrell	Individual	
FIN-C973-880	Lee Gorman	Individual	
FIN-C973-881	Lee Kavanagh	Individual	
FIN-C973-882	Leigh Scanlan	Individual	
FIN-C973-883	Leona Scanlan	Individual	
FIN-C973-884	Lesley Savage	Individual	
FIN-C973-885	Liam Redmond	Individual	
FIN-C973-886	Linda Cassidy	Individual	
FIN-C973-887	Linda Hosey	Individual	
FIN-C973-888	Lisa Swift	Individual	
FIN-C973-889	Lorcan Nolan	Individual	
FIN-C973-890	Lorraine Carroll	Individual	
FIN-C973-891	Lorraine Fitzgerald	Individual	
FIN-C973-892	Louise Fallon	Individual	
FIN-C973-893	Lyndsey Doyle	Individual	
FIN-C973-894	Lynette Mooney	Individual	
FIN-C973-895	Margaret Casly	Individual	
FIN-C973-896	Margaret Nolan	Individual	
FIN-C973-897	Maria McKay	Individual	

FIN-C973-898	Marian Keogh	Individual	
FIN-C973-899	Marie Coleman	Individual	
FIN-C973-900	Marie Gorman	Individual	
FIN-C973-901	Mark Murphy	Individual	
FIN-C973-902	Martha Stafford	Individual	
FIN-C973-903	Martin Stullen	Individual	
FIN-C973-904	Mary Hendrick	Individual	
FIN-C973-905	Mary McCaffrey	Individual	
FIN-C973-906	Melissa Kinsell	Individual	
FIN-C973-907	Michael Casly	Individual	
FIN-C973-908	Michael Kelly	Individual	
FIN-C973-909	Michaele Devereux	Individual	
FIN-C973-910	Michelle Murphy	Individual	
FIN-C973-911	Michelle Smith	Individual	
FIN-C973-912	Moir Lambert	Individual	
FIN-C973-913	Natalie Horan	Individual	
FIN-C973-914	Nathan Dwyer	Individual	
FIN-C973-915	Nathan O'Reilly	Individual	
FIN-C973-916	Neil Flynn	Individual	
FIN-C973-917	Avril Brady	Individual	
FIN-C973-918	Niall Farrell	Individual	
FIN-C973-919	Niamh Cashell	Individual	

FIN-C973-920	Noel O'Connor	Individual	
FIN-C973-921	Nora Leen	Individual	
FIN-C973-922	Orla Stafford	Individual	
FIN-C973-923	Paddy Boyle	Individual	
FIN-C973-924	Pat Allison	Individual	
FIN-C973-925	Pat Darcy	Individual	
FIN-C973-926	Patricia Dunleavy	Individual	
FIN-C973-927	Patricia Manning	Individual	
FIN-C973-928	Patrick O'Reilly	Individual	
FIN-C973-929	Patrick Reilly	Individual	
FIN-C973-930	Paul Goddard	Individual	
FIN-C973-931	Paul McCluskey	Individual	
FIN-C973-932	Paula Moran	Individual	
FIN-C973-933	Paula Whelan	Individual	
FIN-C973-934	Rachel Devereux	Individual	
FIN-C973-935	Rachel Ward	Individual	
FIN-C973-936	Rachel Ward	Individual	
FIN-C973-937	Rhonda Elliott	Individual	
FIN-C973-938	Rima O'Reilly	Individual	
FIN-C973-939	Robert Hone	Individual	
FIN-C973-940	Robyn McKay	Individual	
FIN-C973-941	Ronnie Coleman	Individual	

FIN-C973-942	Rosaleen Kidd	Individual	
FIN-C973-943	Roy Burn	Individual	
FIN-C973-944	Ryan Kane	Individual	
FIN-C973-945	Ruth McKeever	Individual	
FIN-C973-946	Roy Jenkins	Individual	
FIN-C973-947	Sara O'Donohue	Individual	
FIN-C973-948	Sarah Walsh	Individual	
FIN-C973-949	Scott Darcy	Individual	
FIN-C973-950	Sean Gannon	Individual	
FIN-C973-951	Sean Jackson	Individual	
FIN-C973-952	Sean Whelan	Individual	
FIN-C973-953	Shannon Preston	Individual	
FIN-C973-954	Shauna Murphy	Individual	
FIN-C973-955	Siobhan Duffy	Individual	
FIN-C973-956	Spencer Lawlor	Individual	
FIN-C973-957	Stacy Memery	Individual	
FIN-C973-958	Stela Rug	Individual	
FIN-C973-959	Taylor Jenkins	Individual	
FIN-C973-960	Theresa Keogh	Individual	
FIN-C973-961	Thomas Leen	Individual	
FIN-C973-962	Tomasz Belica	Individual	
FIN-C973-963	Tommy O'Connor	Individual	

FIN-C973-964	Tommy O'Halloran	Individual	
FIN-C973-965	Tristan McKay	Individual	
FIN-C973-966	Val Dany	Individual	
FIN-C973-967	Valerie Dunne	Individual	
FIN-C973-968	Vivienne Carey	Individual	
FIN-C973-969	Zarah Elliott	Individual	
FIN-C973-970	Zhau Feng Wang	Individual	
FIN-C973-971	Yavuz Cukur	Individual	
FIN-C973-972	Damien Flood	Individual	
FIN-C973-973	Daniel Kearney	Individual	
FIN-C973-974	Daniel Traynor	Individual	
FIN-C973-975	Danielle Lynch	Individual	
FIN-C973-976	Danny Martin	Individual	
FIN-C973-977	Darren Ashmore	Individual	
FIN-C973-978	Darren Flynn	Individual	
FIN-C973-979	David Brown	Individual	
FIN-C973-980	David Hand	Individual	
FIN-C973-981	David Murray	Individual	
FIN-C973-982	David Purcell	Individual	
FIN-C973-983	Debbie Branagan	Individual	
FIN-C973-984	Debbie McDermott	Individual	
FIN-C973-985	Debbie Ward	Individual	

FIN-C973-986	Debora Kenny	Individual	
FIN-C973-987	Deborah Lynch	Individual	
FIN-C973-988	Deborah Ward	Individual	
FIN-C973-989	Dylan O'Shea	Individual	
FIN-C973-990	Eilis Dalton	Individual	
FIN-C973-991	Elizabeth Dalton	Individual	
FIN-C973-992	Ellie Fox	Individual	
FIN-C973-993	Eoin Haughey	Individual	
FIN-C973-994	Ernest Beggs PC	Individual	
FIN-C973-995	Evan Grimes	Individual	
FIN-C973-996	Favour Ocuchaba	Individual	
FIN-C973-997	Fiona Carroll	Individual	
FIN-C973-998	Gary Corcoran	Individual	
FIN-C973-999	Gemma McAuley	Individual	
FIN-C973-1000	George Kavanagh	Individual	
FIN-C973-1001	Glen Fowler	Individual	
FIN-C973-1002	Glen Lynch	Individual	
FIN-C973-1003	Graham Carrick	Individual	
FIN-C973-1004	Graham Hanna	Individual	
FIN-C973-1005	Hannah Jones	Individual	
FIN-C973-1006	Harry Flemming	Individual	
FIN-C973-1007	Hugh Coll + Family	Individual	

FIN-C973-1008	Hughie McMahon	Individual	
FIN-C973-1009	Ignacio Irigoien	Individual	
FIN-C973-1010	Irene Traynor	Individual	
FIN-C973-1011	Iris O'Donovan	Individual	
FIN-C973-1012	Jack Doyle	Individual	
FIN-C973-1013	Jade Kane	Individual	
FIN-C973-1014	Jake Hyland	Individual	
FIN-C973-1015	Jamie Horan	Individual	
FIN-C973-1016	Jamie Martin	Individual	
FIN-C973-1017	Jason Goddard	Individual	
FIN-C973-1018	Jason Hyland	Individual	
FIN-C973-1019	Jason Srokes	Individual	
FIN-C973-1020	Beirne Dwyer	Individual	
FIN-C973-1021	Jennifer Doyle	Individual	
FIN-C973-1022	Jennifer Moran	Individual	
FIN-C973-1023	Jimmy Clarke	Individual	
FIN-C973-1024	Joan Carroll	Individual	
FIN-C973-1025	Joan Hughes	Individual	
FIN-C973-1026	Jodie Li Flynn	Individual	
FIN-C973-1027	Joe Keogh	Individual	
FIN-C973-1028	Joe McDermott	Individual	
FIN-C973-1029	John Paul Kane	Individual	

FIN-C973-1030	John Redmond	Individual	
FIN-C973-1031	Josh Hanna	Individual	
FIN-C973-1032	Josh Smith	Individual	
FIN-C973-1033	Josie Kearney	Individual	
FIN-C973-1034	Justin Egan	Individual	
FIN-C973-1035	Jason Molloy	Individual	
FIN-C973-1036	John Thornton	Individual	
FIN-C973-1037	Kaan Cukar	Individual	
FIN-C973-1038	Kaci Thornton	Individual	
FIN-C973-1039	Kaila Purcell	Individual	
FIN-C973-1040	Karen Rooney	Individual	
FIN-C973-1041	Karl Traynor	Individual	
FIN-C973-1042	Katie Kinsella	Individual	
FIN-C973-1043	Katie Power	Individual	
FIN-C973-1044	Katie Staniford	Individual	
FIN-C973-1045	Kelly Moran	Individual	
FIN-C973-1046	Kerry Hancock	Individual	
FIN-C973-1047	Kevin Kerrigan	Individual	
FIN-C973-1048	Kieran Foran	Individual	
FIN-C973-1049	Killian Halpin	Individual	
FIN-C973-1050	Kim McCourt	Individual	
FIN-C973-1051	Laura Smith	Individual	

FIN-C973-1052	Laura Staniford	Individual	
FIN-C973-1053	Lauren Corcoran	Individual	
FIN-C973-1054	Leanne Maguire	Individual	
FIN-C973-1055	Layla Fitzpatrick	Individual	
FIN-C973-1056	Leanne Stapleton	Individual	
FIN-C973-1057	Leanne Ward	Individual	
FIN-C973-1058	Lee Lynch	Individual	
FIN-C973-1059	Lee McCluskey Lambert	Individual	
FIN-C973-1060	Lily Lynch	Individual	
FIN-C973-1061	Lily Thornton	Individual	
FIN-C973-1062	Linda Corcoran	Individual	
FIN-C973-1063	Lisa Dunne	Individual	
FIN-C973-1064	Lisa Kane	Individual	
FIN-C973-1065	Lisa O'Neill	Individual	
FIN-C973-1066	Lorna Goddard	Individual	
FIN-C973-1067	Louise Gerraty	Individual	
FIN-C973-1068	Lynn Adderly	Individual	
FIN-C973-1069	Lynn Kinch	Individual	
FIN-C973-1070	Lynn O'Donnell	Individual	
FIN-C973-1071	Lisa Flynn	Individual	
FIN-C973-1072	Marcella Lynch	Individual	
FIN-C973-1073	Margaret Devereux	Individual	

FIN-C973-1074	Margeurite Kelly	Individual	
FIN-C973-1075	Marianna Prodon	Individual	
FIN-C973-1076	Marie Flemming	Individual	
FIN-C973-1077	Marie Kearns	Individual	
FIN-C973-1078	Marisa Traynor	Individual	
FIN-C973-1079	Mark and Aisling Simpson	Individual	
FIN-C973-1080	Mark Dalton	Individual	
FIN-C973-1081	Mark Holland	Individual	
FIN-C973-1082	Mark Kelly	Individual	
FIN-C973-1083	Mark Traynor	Individual	
FIN-C973-1084	Marlaina Kennedy	Individual	
FIN-C973-1085	Martin Maguire	Individual	
FIN-C973-1086	Martina Cush	Individual	
FIN-C973-1087	Martina Kenny	Individual	
FIN-C973-1088	Mary Curran	Individual	
FIN-C973-1089	Mary Martin	Individual	
FIN-C973-1090	Mary Mooney	Individual	
FIN-C973-1091	Mary O'Reilly	Individual	
FIN-C973-1092	Matthew Phelan	Individual	
FIN-C973-1093	Megan Donovan	Individual	
FIN-C973-1094	Meghan Dunne	Individual	
FIN-C973-1095	Mia Demay	Individual	

FIN-C973-1096	Michael Bowden	Individual	
FIN-C973-1097	Michael Joyce	Individual	
FIN-C973-1098	Michael O'Reilly	Individual	
FIN-C973-1099	Michael Savage	Individual	
FIN-C973-1100	Mick Darcy	Individual	
FIN-C973-1101	Mick Moran	Individual	
FIN-C973-1102	Ashling Byrne	Individual	
FIN-C973-1103	Natalie Hanna	Individual	
FIN-C973-1104	Natasha Foster	Individual	
FIN-C973-1105	Nathan Hand	Individual	
FIN-C973-1106	Nicola Brown	Individual	
FIN-C973-1107	Noel Byrne	Individual	
FIN-C973-1108	Noel Gill	Individual	
FIN-C973-1109	Nora Bowden	Individual	
FIN-C973-1110	Paddy Devereux	Individual	
FIN-C973-1111	Patricia Barnes	Individual	
FIN-C973-1112	Patricia Whelan	Individual	
FIN-C973-1113	Patrick Connolly	Individual	
FIN-C973-1114	Patrick Darcy	Individual	
FIN-C973-1115	Patrick Dillon	Individual	
FIN-C973-1116	Patrick Hendrick	Individual	
FIN-C973-1117	Patrisha Flynn	Individual	

FIN-C973-1118	Paul Coleman	Individual	
FIN-C973-1119	Paula Fanning	Individual	
FIN-C973-1120	Paula Kearney	Individual	
FIN-C973-1121	Paula Maguire	Individual	
FIN-C973-1122	Pauline Bulger	Individual	
FIN-C973-1123	Pauline and Thomas McKenna	Individual	
FIN-C973-1124	Peter Dunne	Individual	
FIN-C973-1125	Philip Byrne	Individual	
FIN-C973-1126	Phylis Whelan	Individual	
FIN-C973-1127	Robert Byrne	Individual	
FIN-C973-1128	Robert Carey	Individual	
FIN-C973-1129	Robyn Donovan	Individual	
FIN-C973-1130	Robyn McDonnell	Individual	
FIN-C973-1131	Rose Toal	Individual	
FIN-C973-1132	Rosemary Curran	Individual	
FIN-C973-1133	Ross McDonnell	Individual	
FIN-C973-1134	Sandie Burdis	Individual	
FIN-C973-1135	Sandra Corrigan	Individual	
FIN-C973-1136	Sandra Farmer	Individual	
FIN-C973-1137	Sarah Errity	Individual	
FIN-C973-1138	Sarah O'Connor	Individual	
FIN-C973-1139	Sean Dowd	Individual	

FIN-C973-1140	Shannon Doyle	Individual	
FIN-C973-1141	Sharon Farrell	Individual	
FIN-C973-1142	Shauna Savage	Individual	
FIN-C973-1143	Shellby O'Connell	Individual	
FIN-C973-1144	Sinead Burns	Individual	
FIN-C973-1145	Sonia Maguire	Individual	
FIN-C973-1146	Stephen Redmond, National Party	Individual	
FIN-C973-1147	Stevo Lynch	Individual	
FIN-C973-1148	Suzanne Larkin	Individual	
FIN-C973-1149	Tara Darcy	Individual	
FIN-C973-1150	Taylor Stapleton	Individual	
FIN-C973-1151	Theresa Keogh Junior	Individual	
FIN-C973-1152	Thomas McCluskey	Individual	
FIN-C973-1153	Thomas Whyte	Individual	
FIN-C973-1154	Tori McCarthy	Individual	
FIN-C973-1155	Troy Fowler	Individual	
FIN-C973-1156	Tynan Maguire	Individual	
FIN-C973-1157	Valerie Dunne	Individual	
FIN-C973-1158	Linda Bannon	Organisation	Valley Park Residents Group
FIN-C973-1159	Vicky Thornton	Individual	
FIN-C973-1160	Vivienne Hanlon	Individual	
FIN-C973-1161	Warren Bale	Individual	

FIN-C973-1162	Yvonne McCarthy	Individual	
FIN-C973-1163	Zara Brown	Individual	
FIN-C973-1164	Alannah Darcy	Individual	

Appendix B Screening of Recommendations for AA and SEA

The table below details the screening of the Chief Executive's Recommendations to the Elected Members for Appropriate Assessment and Strategic Environmental Assessment. For formatting purposes, maps/figures have not been included. Reference should be made to the maps/ figures in Section 4.

Proposed Amendment	Text of Proposed Amendment	Screening for Appropriate Assessment & Strategic Environmental Assessment
CE Rec. 1	<u>Amend Figure 4.2 Spatial Framework on page 20 as follows and illustrated on the revised diagram:</u> • Omit the block along the eastern boundary of the Plan lands with Woodbank, Valley Park Road and Scribblestown Avenue residential developments and replace it with open space. • Include an additional residential block north of Scribblestown Park. • Omit the block at the northeast corner of Dunsink Lane, adjacent to Westwood Road. • Stagger the building line of the block west of Westwood and Woodbank Avene residential developments. • Remove the gateway location from the block north of Scribblestown Lane at the south east corner of the development area and include a gateway location at the most northeasterly block. • Revised alignment for the Luas line through the Dunsink West development area and consequential changes.	Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
CE Rec. 2	<u>Amend Figure 5.4 Proposed Public Transport - Light Rail Luas on Page 27 as follows:</u> Updated indicative Luas alignment route over the M50 to be illustrated (and any other relevant figures within the Draft Plan showing the indicative route alignment) in line with the revised figure.	The proposed amendment provides for a more rational alignment of the indicative Luas route approaching and crossing the M50. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-

		207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
CE Rec. 3	<u>Amend Section 5.4 on page 26 as follows:</u> Navan Road Parkway: This will require a new pedestrian and cycle bridge from Dunsink to the station in order to bridge the severance created by the Royal Canal, while providing consideration for the integration of public transport infrastructure into the design of the structure.	Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
CE Rec. 4	<u>Amend Section 5.4 Proposed Public Transport - Light Rail Luas on Page 27 as follows:</u> 'Design considerations for the future Luas' section to include the following text: "A minimum width of 8 to 10m should be reserved for a Luas alignment excluding any other active travel or public transport requirements, widened to an 18m width for a length of 70m at stop locations. Road junctions across the Luas corridor should be kept to an absolute minimum. All future bridge structures or crossings	The proposed amendment provides for safeguarding of future Luas provision. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European

	along the Luas corridor should be designed sufficiently to cater for a Luas alignment and Luas loadings. The Luas crossing of the M50 will be located in such a way as to minimise the length of the crossing lengths and subsequent bridge structures, away from any junction and associated slip lanes, to minimise the future bridge length and safeguard the operational requirements of the M50".	sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
CE Rec. 5	<u>Amend Objective CM04 Proposed Public Transport - Light Rail Luas on Page 27 as follows:</u> CM04: Safeguard and reserve a continuous corridor within the Plan lands for the provision of a future Tyrrelstown Luas route, including adequate reservations for three Luas stops within the core development areas, ensuring that future development is designed in a manner that does not prejudice the delivery of a future Luas along the identified corridor."	The proposed amendment provides for safeguarding of future Luas provision. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
CE Rec. 6	<u>Amend Section 5.4 Proposed Public Transport – Bus on Page 28 as follows:</u> New B5 Spine Bus: This spine bus route will travel from the City Centre to Blanchardstown via Dunsink, offering local and wider connectivity.	Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and

		Strategic Environmental Assessment are not required.
CE Rec. 7	<u>Amend Section 5.4 Urban Layout to Accommodate Buses on Page 28 as follows:</u> Delete the following text: "Bus provision shall be agreed in consultation with the NTA" Include updated text as follows: While provision has been made for bus routes within the urban area plan, these bus routes will be subject to more detailed planning and design work prior to implementation. This design work will be led by NTA in partnership with Fingal County Council.	The amendment provides for clarity on consultation and delivery of public transport. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
CE Rec. 8	<u>Amend Figure 5.5 BusConnects Maps Phases 1, 2 / Full Build Out on Page 28 as follows:</u> Include indicative bus stop location maps and bus terminus infrastructure (including turning circles, laybys and driver welfare facilities) as illustrated in the figures below	The amendment provides for clarity in relation to public transport. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.

CE Rec. 9	<u>Amend Section 5.4 Proposed Public Transport – Bus on Page 29 as follows:</u> Insert additional objective after Objective CM07 and CM08 as follows: Ensure that the street network, including junctions, will accommodate future movement by bus.	The amendment provides for clarity and safeguarding in relation to public transport. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
CE Rec. 10	<u>Amend Section 5.5 Proposed Active Travel Provision, Page 31, under Quietway on River Road as follows:</u> Insert the following text: River Road is proposed to become a designated quietway. Quietways are cycling and walking routes designed to provide a safer, calmer alternative to busy main roads. Through traffic will be removed by installing a filtered permeability solution. Local access to residents and businesses situated along River Road will be maintained from the M50 and Ashtown Road/Dunsinea Lane.	The amendment provides for clarity in relation to proposed quietways. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
CE Rec. 11	<u>Amend Section 5.5 Proposed Active Travel Provision on Page 31 under Segregated Cycleways:</u>	The amendment seeks to provide for enhanced active travel connectivity. Having regard to Schedule 2 of S.I. 456 of

	Insert the following text: Two connections will link directly to Navan Road Parkway and Ashtown Rail Stations, enabling seamless access to the future DART+ West and the Royal Canal Greenway. The link to Navan Road Parkway station will also allow links with the Royal Canal Greenway and if feasible, should also provide a link to Coolmine Rugby Club.	2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
CE Rec. 12	<u>Amend Section 5.10 Construction Traffic Management on Page 39 as follows:</u> Insert the following text as the end of the paragraph: Construction traffic associated with the development of the Dunsink lands shall be directed to utilise designated routes connected to the strategic road network, including the N3, M50 and Dunsink Lane, to the greatest extent possible. The use of local residential streets for construction traffic shall be avoided wherever possible, and in circumstances where this is proposed, it shall be demonstrated to the satisfaction of the Planning Authority that no feasible alternative is available.	The amendment provides for clarity in relation to control of construction traffic and protection of local roads and streets. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
CE Rec. 13	<u>Amend Objective SIEF09 of the Draft UAP to read as follows:</u> The design of surface water drainage systems shall apply a minimum 20% rainfall climate change allowance or any revised percentage which may be identified in local or national policy.	The amendment provides for clarity and future-proofing. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024)

		the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
CE Rec. 14	<u>Amend Section 6.6 to include a new objective as follows (numbering to be in sequence)</u> “Have regard to the OPW Flood Risk Management Guidelines 2009, as revised by Circular PL 2/2014, when assessing planning applications and to require commensurate site specific flood risk assessments to be considered for all new developments within the Plan area. All development must prepare a Stage 1 Flood Risk Analysis and if the flooding risk is not screened out, they must prepare a Site-Specific Flood Risk Assessment (SSFRA) for the development, where appropriate.”	The amendment provides for protection in relation to consideration of flood risk. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
CE Rec. 15	<u>Amend Figure 6.3 on page 44 as follows:</u> Clearly identify the proposed under grounding of the relevant infrastructure with the northern section of the proposed Regional Park lands to remove any ambiguity regarding the location of primary substation infrastructure.	The amendment provides for clarity. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European

		sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
CE Rec. 16	<u>Amend objective SIEF12 on page 45 as follows:</u> Require development proposals to integrate a coordinated 20 kV ring main backbone and associated secondary substations, with the voltage level and network configuration to be determined by ESB Networks, and to be delivered in tandem with development and integrated with urban design, flood risk management and green infrastructure.	The amendment provides for clarity in relation to the delivery of supporting infrastructure. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
CE Rec. 17	<u>Amend Objective GI10 on page 54 as follows:</u> 'Support the development of a Regional Park and Recreational Hub for passive and active recreational uses, incorporating biodiversity restoration and enhancement measures, habitat creation and green linkages at the former Dunsink landfill, and provide for its long-term management and maintenance to ensure its continued ecological, recreational and environmental value.	The amendment provides for clarity in relation to the proposed Regional Park and Recreational Hub. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic

		Environmental Assessment are not required.		
CE Rec. 18	Amend the wording in Table 8.1 on page 67 as follows:			The amendment provides for clarity in relation to the full extent of the protected structure. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
	Structure Name	RPS No.	NIAH Building & Garden Survey Number	
	Ashtown Mill & Mill Race/Channel	0691	11362067	Early 19th century former linseed oil mill complex consisting of mill building and ancillary historic buildings. The route of the water channel/mill race serving the mill and site of the mill pond may still survive. forms part of the mill complex. The site of the mill pond has been covered in by a parking area but elements may survive underneath.

CE Rec. 19	Amend the wording in Table 8.2 on page 68 as follows <table><tr><th>Structure Name</th><th>Description</th></tr><tr><td>Masonry Bridge, Dunsinea Lane</td><td>Double arched masonry bridge over the River Tolka. Partially damaged in the 1950s by flooding.</td></tr></table>	Structure Name	Description	Masonry Bridge, Dunsinea Lane	Double arched masonry bridge over the River Tolka. Partially damaged in the 1950s by flooding.	The amendment provides for clarity in relation to the condition of the masonry bridge at Dunsinea Lane. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
Structure Name	Description					
Masonry Bridge, Dunsinea Lane	Double arched masonry bridge over the River Tolka. Partially damaged in the 1950s by flooding.					
CE Rec. 20	Amend objective AACH13 on page 72 as follows: ‘Development proposals where relevant, shall incorporate the required landscape setback, high quality and context-sensitive design, appropriately scaled building heights and carefully designed low impact lighting and the protection of key views, informed by an Architectural Heritage Impact Assessment and Visual Impact Assessment, including 3D modelling information, to be undertaken by suitably qualified professionals, in order to protect the scientific and cultural significance of Dunsink Observatory’.	Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.				
CE Rec. 21	Amend Table 9.1 on page 77 to add the following text (other content of the table remains unchanged).	The amendment provides for clarity in relation to existing sports and recreation resources. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2				

	<table><tr><th>Category Infrastructure Resource</th><th>Category Infrastructure Resource</th></tr><tr><td>Sports and Recreation</td><td> - Coolmine Rugby Club - Phoenix Football Club - Elmgreen Golf Club - Play Area (Dunsoghly Drive) - St. Joseph's Horse & Pony Club </td></tr></table> Amend Figure 9.1 to include reference to St. Joseph's Horse & Pony Club.	Category Infrastructure Resource	Category Infrastructure Resource	Sports and Recreation	- Coolmine Rugby Club - Phoenix Football Club - Elmgreen Golf Club - Play Area (Dunsoghly Drive) - St. Joseph's Horse & Pony Club	(ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.		
Category Infrastructure Resource	Category Infrastructure Resource							
Sports and Recreation	- Coolmine Rugby Club - Phoenix Football Club - Elmgreen Golf Club - Play Area (Dunsoghly Drive) - St. Joseph's Horse & Pony Club							
CE Rec. 22	Amend Table 9.2 as follows (other content of the table remains unchanged) <table><tr><th>Category</th><th>Provision</th></tr><tr><td>Health and Social Services Sports and Recreation</td><td> - Coolmine Rugby Club - Phoenix Football Club - Elmgreen Golf Club - Play Area (Dunsoghly Drive) </td></tr><tr><td>Sports and Recreation Health and Social Services</td><td> - Ashtown Medical Centre - Village Medical Centre Finglas - Finglas West Family Resource Centre </td></tr></table>	Category	Provision	Health and Social Services Sports and Recreation	- Coolmine Rugby Club - Phoenix Football Club - Elmgreen Golf Club - Play Area (Dunsoghly Drive)	Sports and Recreation Health and Social Services	- Ashtown Medical Centre - Village Medical Centre Finglas - Finglas West Family Resource Centre	The amendment provides for correction of titles. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
Category	Provision							
Health and Social Services Sports and Recreation	- Coolmine Rugby Club - Phoenix Football Club - Elmgreen Golf Club - Play Area (Dunsoghly Drive)							
Sports and Recreation Health and Social Services	- Ashtown Medical Centre - Village Medical Centre Finglas - Finglas West Family Resource Centre							
CE Rec. 23	Amend Section 9.3.2 as follows:	The amendment provides for clarity. Having regard to Schedule 2 of S.I. 456 of						

	Aligned with childcare provision, meeting the requirements of future primary and post-primary aged persons, including children and young people with special educational needs, in Dunsink represents a critical element in creating a long-term community. Based on demographic information recorded by the Census in 2022 and taking cognisance of the national declining birth rate as per CSO data/projections, it is estimated that c.6 no. primary schools and c.4 no. postprimary schools may ultimately be required for Dunsink. The Urban Area Plan makes provision for 10 no. school locations across Dunsink to accommodate these requirements or, alternatively if required, the sites can facilitate special educational needs schools.	2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
CE Rec. 24	<u>Amend Figure 12.2 Spatial Layout Overview on page 89 as follows and illustrated on the revised diagram:</u> • Omit the block along the eastern boundary of the Plan lands with Woodbank, Valley Park Road and Scribblestown Avenue residential developments and replace it with open space. • Include an additional residential block north of Scribblestown Park. • Omit the block at the northeast corner of Dunsink Lane, adjacent to Westwood Road. • Stagger the building line of the block west of Westwood and Woodbank Avenue residential developments. • Revised alignment for the Luas line through the Dunsink West development area and consequential changes to the block layout in this area.	Provides for update arising from proposed amendments. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
CE Rec. 25	<u>Amend text in Section 12.2.1 as follows:</u>	The amendment provides for slight changes (and correction in lower unit

	The density of development in this area will range from approximately 75 50 to 200 150 units per hectare (net) with the lower figure relating to the first phase of development. Thereafter, densities will increase to support public transport investment.	numbers) to density range in response to submissions seeking to protect existing residential amenity. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
CE Rec. 26	<u>Amend objective UDF13 on page 90 as follows:</u> 'Implement low impact public external lighting that minimises light spill and skyglow across the development area in accordance with the public external lighting requirements of this Plan.'	The amendment provides for clarity. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
CE Rec. 27	<u>Include new objective on page 91 as follows: (number to sequentially follow UDF 22 as listed in the Draft Plan)</u>	The amendment provides for clarity in relation to protection of residential amenity. Having regard to Schedule 2 of

	Ensure that future development proposals incorporate an appropriate interface with existing residential areas, ensuring that building height, scale, massing and layout are carefully designed to protect residential amenity.	S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.				
CE Rec. 28	<u>Amend table on P. 91 as follows:</u> <table><tr><td>Density Range (Net)</td><td>c. 75 50 – c.200 150 dph</td></tr><tr><td>Approximate Unit Range</td><td>c.6,500 no. – c.6,800 no. c. 1900 no. – 5,700 no.</td></tr></table>	Density Range (Net)	c. 75 50 – c. 200 150 dph	Approximate Unit Range	c.6,500 no. – c.6,800 no. c. 1900 no. – 5,700 no.	The amendment provides for slight changes (and correction in lower unit numbers) to density range in response to submissions seeking to protect existing residential amenity. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
Density Range (Net)	c. 75 50 – c. 200 150 dph					
Approximate Unit Range	c.6,500 no. – c.6,800 no. c. 1900 no. – 5,700 no.					
CE Rec. 29	<u>Amend Figure 12.4 Dunsink East Development Area-Spatial Framework on page 92 as follows and illustrated on the revised diagram:</u>	Provides for update arising from proposed amendments. Having regard to Schedule 2 of S.I. 456 of 2025 and Part				

	• Omit the block along boundary with Woodbank, Valley Park Road and Scribblestown Avenue residential developments and replace it with open space. • Include an additional residential block north of Scribblestown Park. • Omit the block at the northeast corner of Dunsink Lane, adjacent to Westwood Road. • Illustrate proposed gateway building locations at southeast corner of the development area.	6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
CE Rec. 30	<u>Amend Section 12.2.2 at page 94 as follows:</u> The density of development in this area will range from approximately 75-50 to 160-140 units per hectare (net), with the lower figure relating to the first phase of development.	The amendment provides for slight changes to density ranges. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
CE Rec. 31	<u>Amend Section 12.2.2 at page 94 as follows:</u> The proposed active travel bridge is a key piece of infrastructure within the Plan area, providing a direct connection between residential areas and the Navan Road Parkway Rail Station. By prioritising walking and cycling, it supports sustainable mobility and integrates the Plan lands with the wider transport network. Consideration can also be given to	The amendment provides for further consideration of public transport measures. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the

	the potential integration of public transport infrastructure into the design of this bridge.	amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required
CE Rec. 32	<u>Amend objective UDF38 on page 96 as follows:</u> 'Lighting shall be low impact and designed to avoid glow or light spill in accordance with the external lighting strategy for the Plan area.'	The amendment provides for clarity. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
CE Rec. 33	<u>Amend UDF47 at page 96 as follows:</u> UDF47 The proposed active travel bridge linking to the existing Navan Road Parkway rail station shall be designed as a high-quality and inclusive piece of infrastructure that prioritises pedestrians and cyclists and demonstrating high-quality architectural design, structural form and material finish. Consideration can also be given to the potential integration of public transport infrastructure into the design of this bridge. The bridge shall be fully integrated into the surrounding landscape and movement network, ensuring seamless connectivity and universal accessibility. Appropriate and sensitive treatment shall be	The amendment provides for further consideration of public transport measures. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate

	provided at each landing point with well-designed public realm and strong visual and physical connections into adjoining areas.	Assessment and Strategic Environmental Assessment are not required.				
CE Rec. 34	<u>Amend table on P. 96 as follows:</u> <table><tr><td>Density Range (Net)</td><td>c. 75 50 – c.160 140 dph</td></tr><tr><td>Approximate Unit Range</td><td>c.4,250 no. – c.4,550 no. c. 1,600 no. – 4,500 no.</td></tr></table>	Density Range (Net)	c. 75 50 – c. 160 140 dph	Approximate Unit Range	c.4,250 no. – c.4,550 no. c. 1,600 no. – 4,500 no.	The amendment provides for slight changes (and correction in lower unit numbers) to density range in response to submissions seeking to protect existing residential amenity. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
Density Range (Net)	c. 75 50 – c. 160 140 dph					
Approximate Unit Range	c.4,250 no. – c.4,550 no. c. 1,600 no. – 4,500 no.					
CE Rec. 35	<u>Amend objective UDF67 on page 99 as follows:</u> 'Implement low impact public external lighting that minimises light spill and skyglow across the development area in accordance with the public external lighting requirements of this Plan.	The amendment provides for slight changes (and correction in lower unit numbers) to density range in response to submissions seeking to protect existing residential amenity. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental				

		effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.				
CE Rec. 36	<u>Include new objective at page 99 as follows:</u> (numbers to sequentially follow UDF 68 as listed in the Draft Plan): Development proposals adjoining or affecting national road infrastructure shall protect the M50’s strategic function, operation and physical integrity, including drainage, bridges and structures, demonstrate compliance with all relevant TII Publications (Standards and Technical) requirements and ensure that the safety, operation, maintenance and capacity of the motorway and associated assets are not adversely affected.	The amendment provides for clarity and safeguarding in relation to protection of existing infrastructure and future development, including residential development. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.				
CE Rec. 37	<u>Amend table on P. 99 as follows:</u> <table><tr><td>Density Range (Net)</td><td>c. 190 120 – c.220 180 dph</td></tr><tr><td>Approximate Unit Range</td><td>c.6,750 no. – c.7,050 no. c. 4,000 no. – 6,000 no.</td></tr></table>	Density Range (Net)	c. 190 120 – c. 220 180 dph	Approximate Unit Range	c.6,750 no. – c.7,050 no. c. 4,000 no. – 6,000 no.	The amendment provides for slight changes (and correction in lower unit numbers) to density range in response to submissions seeking to protect existing residential amenity. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024)
Density Range (Net)	c. 190 120 – c. 220 180 dph					
Approximate Unit Range	c.6,750 no. – c.7,050 no. c. 4,000 no. – 6,000 no.					

		the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
CE Rec. 38	<u>Amend Figure 12.9 Dunsink West Development Area-Spatial Framework on page 100 as follows and illustrated on the revised diagram below:</u> • Amend the alignment of the Luas line through the area and the M50 crossing point location. • Consequentially revise, the indicative block layout and the proposed location of the Luas stop in this area.	Provides for update arising from proposed amendments. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
CE Rec. 39	<u>Amend Figure 12.12 Dunsink Cultural Quarter Conceptual Image on Page 104 as follows:</u> Remove the space in boundary wall at the Meridian Wall to illustrate a closed boundary wall.	The amendment provides for clarity. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European

		sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
CE Rec. 40	<u>Include new objective at page 105 as follows:</u> (number to sequentially follow UDF 84 as listed in the Draft Plan) To support the continued operation and future development of the National Orthopaedic Hospital Cappagh and ensure that future development, including road connections, public transport infrastructure and active travel routes, reinforces and protects hospital operations, accessibility, patient safety and security.	Provides for clarity in relation to supporting the operation of and potential development of the National Orthopaedic Hospital Cappagh. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
CE Rec. 41	<u>Include new objective at page 105 as follows:</u> (numbers to sequentially follow UDF 85 <u>as</u> listed in the Draft Plan) Development proposals adjoining or affecting national road infrastructure shall protect the M50's strategic function, operation and physical integrity, including drainage, bridges and structures, demonstrate compliance with all relevant TII Publications (Standards and Technical) including the Spatial Planning and National Roads Guidelines and ensure that the safety, operation, maintenance and capacity of the motorway and associated assets are not adversely affected.	The amendment provides for clarity and safeguarding in relation to protection of existing infrastructure and future development, including residential development. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and

		will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
CE Rec. 42	<u>Amend Objective UDF89 at page 107 as follows:</u> Provide pedestrian and cycle linkages to the wider Plan lands, surrounding neighbourhood and key public transport infrastructure, particularly the Navan Road Parkway rail station and including the provision of such linkages to existing community facilities, such as the Coolmine Rugby Club lands, where feasible.	The amendment seeks to provide for enhanced active travel connectivity. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
CE Rec. 43	<u>Include new objective at page 107 as follows:</u> (numbers to sequentially follow UDF 92 as listed in the Draft Plan) Protect and enhance the built and natural heritage of the Royal Canal and ensure that development along it or within its vicinity is sensitively designed and does not have a detrimental effect on the character of the Canal, its built elements and its natural heritage values. Works to the built fabric of the Royal Canal should have regard to Waterways Ireland's Heritage and Biodiversity Plan 2030 and Guidelines for Conservation of Built Heritage-Repair and maintenance of heritage structures on the inland waterways of Ireland, (2015).	The amendment provides for enhanced protection for built and natural heritage of the Royal Canal and its corridor. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and

		Strategic Environmental Assessment are not required.
CE Rec. 44	<u>Include new objective on page 109 as follows:</u> (numbers to sequentially follow UDF 103 as listed in the Draft Plan) Development proposals adjoining or affecting national road infrastructure shall protect the M50's strategic function, operation and physical integrity, including drainage, bridges and structures, demonstrate compliance with all relevant TII Publications (Standards and Technical) including the Spatial Planning and National Roads Guidelines and ensure that the safety, operation, maintenance and capacity of the motorway and associated assets are not adversely affected.	The amendment provides for clarity and safeguarding in relation to protection of existing infrastructure and future development, including residential development. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
CE Rec. 45	<u>Amend Section 12.3 Scale and Density of Development at page 114 as follows:</u> The gross plot area of the East, Central and West development areas constitutes c.165 hectares. The calculated net residential area of this land is c.102 hectares. The net residential area excludes non-residential uses such as reserved school sites, proposed parks, commercial and community uses. The overall net residential density figure for the East, Central and West development area aligns with those set out in the Sustainable Residential Development and Compact Settlement Guidelines (2024) for City-Urban Neighbourhoods between 50-250 dph. It should be noted that the net residential area of c.102 hectares is	The amendment provides for clarity. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.

	indicative only. This figure may be subject to change as individual development proposals are brought forward.	
CE Rec. 46	The inclusion of the lower range density of 75 50 units per hectare (net) is envisaged for the first phase of development with the subsequent phases providing density at the higher level to support high capacity public transport investment.	
CE Rec. 47	<u>Amend Section 12.4.4 'Gateway/Landmark Buildings' at page 116 as follows:</u> Gateway buildings can be signified by increased height and/or shall be signified by distinctive architectural treatment. Fig. 12-18 shows indicative building heights and gateway locations within the Plan lands.	The amendment provides for clarity. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
	<u>Amend Figure 12.18 Building Heights on page 116 as follows and illustrated on the revised diagram:</u> • Omit the block along boundary with Woodbank, Valley Park Road and Scribblestown Avenue residential developments and replace it with open space. • Include an additional residential block north of Scribblestown Park. • Omit the block at the northeast corner of Dunsink Lane, adjacent to Westwood Road.	Provides for update arising from proposed amendments. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites.

	- Remove gateway building designation from blocks shown and replace with height of 2-6 storeys height for the Dunsink East development area and 15+ storeys height in the Dunsink West development area. - Include footnote with respect to upper building heights.	Appropriate Assessment and Strategic Environmental Assessment are not required.
CE Rec. 48	<u>Amend text in Section 12.3 as follows:</u> The inclusion of the lower range density of 75 50 units per hectare (net) is envisaged for the first phase of development with the subsequent phases providing density at the higher level to support high capacity public transport investment.	The amendment provides for slight changes to density range in response to submissions seeking to protect existing residential amenity. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
CE Rec. 49	<u>Amend Section 12.5 as follows:</u> Change heading of Section 12.5 to read 'Public External Lighting in the Landscape' Include additional text at the start of the section as follows: This guidance and associated objectives relate to external lighting in the landscape including but not limited to public lighting,	The amendment provides for clarity. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and

	commercial, recreational, exterior building lighting and signage lighting.	Strategic Environmental Assessment are not required.
CE Rec. 50	Amend UDF 117 at page 118 as follows: UDF117 Planning applications for development proposals which include public external lighting shall be accompanied by a detailed public external lighting design which shall comply with the principles as outlined in this Plan.	The amendment provides for clarity. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
CE Rec. 51	<u>Include one objective at page 118 as follows (numbering to sequentially follow UDF117 as listed in the Draft Plan):</u> To require a commensurate lighting impact assessment to be submitted with all applications which include external lighting to assess potential impacts associated with the proposed external lighting design including the minimisation of light spill, glare and sky glow, the protection of biodiversity and residential amenity and the safeguarding of the operational integrity of Dunsink Observatory.	The amendment provides for enhanced protection and safeguarding for the operational integrity of Dunsink Observatory. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.

CE Rec. 52	<u>Include one objective at page 118 as follows (numbering to sequentially follow UDF118 as listed in the Draft Plan):</u> Restrict the use of externally illuminated and digital advertising displays where they would result in unacceptable impacts on dark sky conditions, residential amenity, biodiversity, landscape character or the operation of Dunsink Observatory.	The amendment provides for enhanced protection and safeguarding for Dunsink Observatory. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
CE Rec. 53	<u>Amend Phase 1 infrastructure requirements on P. 120 as follows:</u> Insert additional bullet point to read: Improvements to Dunsink Lane as are necessary to accommodate construction traffic.	The amendment provides for clarity on phased delivery of infrastructure. The proposed amendment provides for safeguarding of future Luas provision. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.

CE Rec. 54	<u>Amend Phase 2 infrastructure requirements on P. 121 as follows:</u> Amend text as follows: Upgrade of Dunsink Lane completed and central portion of Southern Link Road confirmed.	The amendment provides for clarity on phased delivery of infrastructure. The proposed amendment provides for safeguarding of future Luas provision. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
CE Rec. 55	<u>Amend Section 13.2 as follows:</u> Include an additional bullet point in Phase 1: Future proof all residential development and potential major heat users to connect into future district heating system as appropriate.	The amendment provides for future proofing. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
CE Rec. 56	Provide for review and correction/update as necessary of the SEA Environmental Report and AA Natura Impact Report.	Not applicable

CE Rec. 57	<u>Amend Table 7.1 to read as follows:</u> <table><tr><td>Highly Vulnerable</td><td>Greater of: • 0.1% AEP (present day / Flood Zone B) flood level + 500 mm freeboard • 0.1% AEP MRES HEFS CC flood level + 250 mm freeboard </td></tr></table>	Highly Vulnerable	Greater of: • 0.1% AEP (present day / Flood Zone B) flood level + 500 mm freeboard • 0.1% AEP MRES HEFS CC flood level + 250 mm freeboard	The amendment provides for enhanced protection from flood risk. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
Highly Vulnerable	Greater of: • 0.1% AEP (present day / Flood Zone B) flood level + 500 mm freeboard • 0.1% AEP MRES HEFS CC flood level + 250 mm freeboard			
CE Rec. 58	<u>Amend Section 2.4 of the Strategic Flood Risk Assessment as follows:</u> The Royal Canal is situated between the River Tolka and southern boundary of the Plan Area. A number of open water features associated with the Dunsink landfill are located in the northern portion of the Plan Area. Flood risk from identified open water features is considered subsequently in the report. It is noted that a number of ‘artificial’ / controlled open water features associated with the Dunsink landfill are located in the northern portion of the Plan Area but are not considered a source of fluvial flooding and as such, do not form part of this assessment.	The amendment provides for clarity. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.		

CE Rec. 59	<u>Amend Section 3.4.4 of the Sustainable Drainage Strategy to read as follows:</u> The future impacts of climate change on rainfall should be accounted for in the design of a drainage scheme. Requirements for climate change allowances are set out in the OPW's 'Climate Change Sectoral Adaptation Plan' published in 2019 2025, which recommends a 20% uplift in extreme rainfall depths for the Mid-Range Future Scenario (MRFS) and a 30% uplift for the High-End Future Scenario (HEFS).	The amendment provides for update. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
CE Rec. 60	<u>Amend Section 3.5.1 to include additional text as follows:</u> Where site investigation / infiltration testing indicates that existing ground conditions have sufficient capacity for infiltration, groundwater risk screening should be undertaken to demonstrate manageable risk (as set out in Chapter 26, Tables 26.5 and 26.6 of the CIRIA SuDS Manual). In addition, infiltration SuDS shall not be adopted in areas of known or suspected contamination unless site-specific investigation and risk assessment demonstrate that infiltration would not result in unacceptable mobilisation of contaminants or risk to groundwater.	The amendment provides for clarity and protection in relation to flood zones. Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
CE Rec. 61	<u>Amend Section 4.2 of the SDS to include the following paragraph at the end of the section:</u>	The amendment provides for clarity and protection in relation to flood zones.

	In particular, the detailed layouts and design shall take into account the context and constraints associated with a given site including the findings of site-specific flood risk assessments and, particularly for ground disturbing components such as basins, wetlands and swales, must take into account any identified archaeological and architectural heritage assets and any associated buffer or consultation requirements.	Having regard to Schedule 2 of S.I. 456 of 2025 and Part 6, Chapter 2 (ss.198-207) of the Planning and Development Act 2024 (No. 34/2024) the amendment will not give rise to potential for significant environmental effects and will not have a likely significant effect on any European sites. Appropriate Assessment and Strategic Environmental Assessment are not required.
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