

**PARK WEST – CHERRY ORCHARD
LOCAL AREA PLAN 2019**

**Strategic Environmental Assessment (SEA)
STATEMENT**



4th November 2019.

Prepared following the adoption of the draft Park West – Cherry Orchard LAP, as amended by the members of Dublin City Council on the 7th October 2019, which was published and came into effect on the 4th November 2019.

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1 Introduction and Background

1.1 Terms of Reference

This is the Strategic Environmental Assessment 'Statement' for the Park West – Cherry Orchard LAP 2019, prepared in accordance with the requirements of the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (SI 436 of 2004).

The Plan was adopted at a City Council meeting on the 7th October 2019, thereafter coming into effect four weeks from that date, in accordance with Section 20(4A) of the Planning and Development Act 2000 (as amended); the plan comes into effect on the **4th November 2019**.

1.2 SEA Definition

Strategic Environmental Assessment (SEA) is the process by which environmental considerations are required to be fully integrated into the preparation of Plans and Programmes and prior to their final adoption. The objectives of the SEA process are to provide for a high level of protection of the environment and to promote sustainable development by contributing to the integration of environmental considerations into the preparation and adoption of the Plan.

1.3 Legislative Context

The SEA was carried out to comply with the provisions of the SEA Directive (Directive 2001/42/EC) of the European Parliament and of the Council, of 27th June 2001, on the Assessment of Certain Plans and Programmes on the environment, referred to hereafter as the SEA Directive. The SEA Directive was transposed into Irish Law through: -

- The European Communities (Environmental Assessment of Certain Plans and Programmes Regulations 2004 (S.I. No. 435 of 2004);
- The Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436 of 2004);
- Planning and Development (Environmental Assessment of Certain Plans and Programmes) (S.I. No. 200 of 2011) and
- Planning and Development (Strategic Environmental Assessment) (Amendment) Regulations 2011 (S.I. No. 201 of 2011).

The legislation requires that the plan-making authority must make available a statement summarising how the SEA and consultations have been taken into account in the Plan. This statement is referred to as the SEA Statement.

1.4 Summary of the SEA Process

Step 1: Screening to determine if SEA is required. The Planning Authority undertook a screening of the proposed LAP for the purposes of determining whether an SEA was required. Due to the size of the population within the LAP area (in excess of 5,000 persons), it was determined that an SEA was required.

Step 2: Scoping & Statutory Consultation to ensure that the relevant environmental issues are identified so that they can be addressed appropriately in the Environmental Report. The objective of scoping is to identify key issues of concern that should be addressed in the environmental assessment of the LAP. This step involved the preparation of a Scoping Issues Paper (April 2018) which was submitted to the statutory environmental authorities for their consideration. This process informs the level of detail to be included in the Environmental Report.

Step 3: Preparation of a Draft Environmental Report (alongside the draft LAP). The likely significant effects of implementing the LAP were identified, described and evaluated in the draft Environmental Report.

Step 4: Statutory Consultation on Draft LAP & Environmental Reports: The Draft Park West – Cherry Orchard Local Area Plan and associated Environmental Assessments including the SEA were placed on public display for a period of six weeks, from 11th June to 22nd July (inclusive)

during which time submissions and observations were invited. A total of 126 no. submissions were received.

Step 5: Preparation of an SEA Statement summarising how environmental considerations have been integrated into the Local Area Plan, how the results of opinions expressed, submissions received and consultations carried out have been taken into account in the SEA process and the reasons for choosing the LAP as adopted. This report forms the SEA Statement.

Step 6: Monitoring of significant environmental effects following adoption and implementation of the Plan.

1.5 Implication of SEA for the Local Area Plan

Strategic Environmental Assessment (SEA) was undertaken on the Draft Park West – Cherry Orchard LAP in order to comply with the SEA Directive and transposing Regulations. The findings of the SEA are expressed in an Environmental Report, the first published version of which accompanied the Draft Local Area Plan on public display.

In addition to the SEA, Screening for Appropriate Assessment (AA) was also undertaken on the Draft Plan, in order to comply with EU Habitats Directive (92/43/EEC) and transposing Regulations. The ‘Appropriate Assessment Screening Report’ contains the findings of this assessment.

A Strategic Flood Risk Assessment (SFRA) was also undertaken in order to comply with the Flood Risk Management Guidelines.

The Draft LAP and the aforementioned environmental reports were placed on public display for a period of 6 weeks from 11th June to 22nd July 2019 (inclusive) during which time submissions and observations were invited. The elected members were invited to consider the Draft LAP and the Chief Executive’s Report on Public Submissions (CE Report no. 275/19). During this consideration period Members were invited to submit motions based on report 275/19. The subsequent Chief Executive’s Report on these Motions (CE Report No. 276/19), together with the CE report on public submissions, was submitted for consideration at the monthly Council City Council meeting held on the 7th October 2019. The Members, having considered the Draft LAP, the accompanying environmental reports and the CE Reports resolved to make the Local Area Plan, in accordance with the amendments set out in the CE reports. These amendments were deemed to be non-material in nature. The Local Area Plan, in accordance with the Planning and Development Act 2000 (as amended), will come into effect four weeks after the decision to adopt; on the 4th November 2019.

1.6 SEA Statement

The SEA Statement is described in Article 9 of the SEA Directive as a statutory requirement and should be made available with the adopted Plan. This will be issued to the environmental authorities previously consulted, with a view to outlining the key stages of the SEA process and illustrating how environmental considerations have been integrated into the plan and key decisions taken in the Plan as a consequence of the SEA.

The SEA Statement is required to include the following information: -

- a) How environmental considerations have been integrated into the Plan;
- b) How the Environmental Report, submissions and observations made to the planning authority and any transboundary consultations (where relevant) have been taken into account during the preparation of the Plan;
- c) The reasons for choosing the Plan, as adopted, in the light of the other reasonable alternatives dealt with; and
- d) The measures decided upon to monitor the significant environmental effects of implementation of the Plan.

2 Integration of Environmental Considerations into the Local Area Plan

2.1 Introduction

Environmental considerations were integrated in the Local Area Plan making process at all stages. As the LAP developed, environmental considerations were directly considered at a number of stages in the SEA process as outlined in Table 1 below which shows the key stages of SEA.

This section of the report sets out how environmental considerations and the findings of the Strategic Environmental Assessment (SEA) as presented in the Environmental Report were taken into account during the preparation of the LAP for Park West – Cherry Orchard. It also sets out how submissions on the Draft Plan and Environmental Report were incorporated into the process.

The SEA, the Appropriate Assessment (AA) and the Strategic Flood Risk Assessment (SFRA) processes have been undertaken in parallel to the preparation of the Draft Plan. From the outset, considerations of the environmental consequences of the alternatives have been taken into account. The iterative process ensured that the SEA/AA & SFRA and the preparation of the LAP were integrated in order to meet the environmental objectives and the objectives of the Plan.

Table 1: Key stages of the SEA Process

Stage	Description
Screening	The first stage of the Strategic Environmental Assessment (SEA). Screening assessed the need to undertake a SEA. Under the Planning and Development Act 2000 (as amended) a full SEA is mandatory for the Park West – Cherry Orchard Local Area Plan.
Scoping	Scoping of the Park West – Cherry Orchard LAP 2019 was carried out in accordance with Article 5 (4) of the SEA Directive (2001/42/EC). Scoping is undertaken to ensure that the relevant environmental issues are identified allowing them to be addressed appropriately in the Environmental Report. The principal purpose of the Scoping stage is to decide upon the range of environmental issues to be included in the Environmental Report. By highlighting some of the significant issues at an early stage ensure these issues are firmly to the forefront when considering the objectives of the LAP. A Scoping Issues Paper was prepared by the Planning Authority and initial consultation was carried out in April 2018 with the statutory consultees.
Consultation with the Environmental Authorities	Submissions were received from:- Department of Culture, Heritage and the Gaeltacht Environmental Protection Agency
Scoping Report	Submissions received from the environmental authorities were reviewed and incorporated into the process where warranted.
Preparation of ER & Local Area Plan	A multi-disciplinary team was established to create policy consistent documents and to examine the effects on the environment of implementing the LAP objectives. Key principles and objectives of the LAP assessed in the Environmental Report (ER) and development options examined. Feedback from on-going Plan preparation process and ER preparation. Mitigation measures were discussed and chosen.

	Monitoring incorporated into existing methods.
Monitoring the Local Area Plan	Monitoring significant environmental effects over the lifetime of the Park West – Cherry Orchard Local Area Plan 2019.

2.2 Screening

Screening assesses the need to undertake a Strategic Environmental Assessment. Under the Planning and Development Act 2000 (as amended) a full SEA is mandatory for the Park West – Cherry Orchard Local Area Plan 2019, based on the size of the population (in excess of 5,000 persons).

2.3 Scoping & Pre-Draft Stage

Scoping of the Park West – Cherry Orchard Local Area Plan was carried out in accordance with Article 5 (4) of the SEA Directive (2001/42/EC).

The principal purpose of the Scoping stage is to decide upon the range of issues and level of detail to be included in the Environmental Report. An overview of the relevant environmental issues requiring further analysis is presented and considered in the Environmental Report and ultimately in the LAP itself. By highlighting some of the significant issues at an early stage ensure these issues are firmly to the forefront when considering the objectives of the LAP.

The scoping aspect involved consultation with the statutory consultees, as identified under the Planning and Development (Strategic Environmental Assessment) (Amendment) Regulations 2011 which includes: -

- The Environmental Protection Agency (EPA)
- Department of Housing, Planning, Community and Local Government
- Department of Culture, Heritage and the Gaeltacht
- Department of Agriculture, Food and the Marine
- Department of Communications , Climate Action & Environment
- Any adjoining Planning Authority whose area is contiguous to the area of a planning authority which prepared a plan – in this case South Dublin County Council.

In addition to the above the City Council also engaged with Waterways Ireland (due to the proximity of the Canal).

In line with best practice a Scoping Issues Paper was prepared by the planning authority to facilitate the consultation process. Initial consultation was carried out in April 2018 with the issuing of the Scoping Issues Paper to the above mentioned statutory environmental authorities. Written feedback was received and was taken on board.

Summary of Feedback from the Environmental Authorities

1. Department of Culture, Heritage and the Gaeltacht
 - Grand Canal pNHA forms a boundary with the LAP. The Local Authority should ensure an adequate buffer is left along this waterway to ensure it continues to act as an ecological corridor as envisaged under article 10 of the Habitats Directive.
 - Guidance provided in relation to nature conservation, Strategic Environmental Assessment and Appropriate Assessment and the making of the LAP.

2. Environmental Protection Agency

Submission provided guidance as to the SEA process, with key aspects to be considered including:

- Supporting the national transition to a climate resilient low carbon economy and society
- Linking of development to the ability to provide adequate and appropriate critical service infrastructure
- Protecting environmental sensitivities within / adjacent to the Plan area, including national and European designated sites and associated ecological corridors.
- Ensuring consistency with key high level plans / programmes including the National Planning Framework (DHPLG), River Basin Management Plan for Ireland (DHPLG), Smarter Travel (DTTAS), National Mitigation Plan and National Adaptation Framework (DCCAE), Irish Water's Capital Investment Plan, Water Services Strategic Plan.

2.4 Pre-Draft Non Statutory Consultation Issues Paper

The pre-draft consultation process began with the preparation of an Issues Paper, to identify the issues for the local area from the point of view of local residents, businesses, land owners, state bodies, operating services in the area and other interested stakeholders. To assist this process a non-statutory Issues Paper was prepared and put on public display for a four week period, from 12th February 2018- 29th March 2018 (both dates inclusive), with public notification by way of a newspaper notice, use of the City Council website and social media accounts (facebook, twitter) and erection of local posters in the area. During this period the Issues Paper was made available for viewing at the City Council offices at Wood Quay, at the Orcharde Community Development Centre, the Ballyfermot Community Civic Centre and online at www.dublincity.ie. In addition, members of the Planning Authority were available locally in the area to assist with any queries on a number of specified days/times.

A summary of the issues raised during this period was presented to the Council in a Chief Executive's Report (Report No. 136/2018) in June 2018. The motion to prepare a Draft LAP for the area was put and carried at this meeting. Following the pre-draft consultation process and the Scoping exercise outlined above, preparation began on the Draft LAP.

2.5 Environmental Report

The type of information to be provided in the Environmental Report is set out in Annex I of the SEA Directive - reproduced in Schedule 2B of the Planning and Development Regulations 2001 (as inserted by article 12 of the Planning and Development (Strategic Environmental Assessment) Regulations 2004).

The Environmental Report is prepared alongside the LAP process and investigates, describes and evaluates the effects on the receiving environment of implementing the LAP. The report also assesses and identifies development alternatives and identifies the environmentally preferred development strategy.

The preparation of the Environmental Report influenced the formulation of the Local Area Plan in a number of distinct ways: -

- It encouraged the wide use of background environmental data and formally connects this data to the making of the plan.
- It determined the Environmental Protection Objectives (EPOs) against which the key principles and objectives of the plan were assessed.
- The Environmental Protection Objectives (EPOs) will form the basis for the future on-going monitoring of the Local Area Plan.
- The Environmental Report which determined the identified development strategy options provides the most sustainable and appropriate environmental approach to the future

development of the area's settlements, when assessed against the Strategic Environmental Objectives.

- It provides greater transparency to the public as to how environmental issues are incorporated and assessed in the plan-making process.

Key issues were identified in the Environmental Report across each of the environmental areas. The full review of key issues is set out in Chapter 3 of the Environmental Report.

2.5.1 SEA of the Draft Plan

The Draft Plan was considered for its possible impacts on the environment. The initial stage aimed to ascertain the quality, if any, of the potential impact. Each of the Plan's objectives was screened for their impact and where a neutral impact is noted no further discussion is provided within this report. This format allows for the Environmental Report to focus on the negative and positive impact.

It is thus a more robust, more focused approach to understanding the potential impact associated with the Plan's implementation. Where it was determined that an objective may potentially result in a negative impact on an environmental receptor appropriate level mitigation measures were identified or proposed.

The assessment informing the Draft Plan was arrived at following both the submissions received during Scoping Consultation in addition to the assessment of the Draft Plan key principles and objectives against the established Environmental Protection Objectives (EPO's).

2.5.2 Consideration of Alterations

A number of alternatives were considered at an early stage in the process and evaluated for their likely significant environmental effects (see section 6 and 7 of the Environmental Report). Options considered were based around the use of specific key sites for varying purposes: -

For the purposes of this Local Area Plan, three key sites/locations were examined: -

1. Site no. 5, Barnville Site (south of Cherry Orchard Park)
2. Site no. 3a, M50 Cloverhill Site (west of Cloverhill Road)
3. Site no. 4, M50 – Cedarbook Avenue Site (north of the train station).

By evaluating each of these alternatives against the Environmental Protection Objective's the options chosen for the LAP were based upon informed environmental as well as planning considerations.

2.5.3 Mitigation

In order to comply with various statutory requirements and in order to comply with the requirements of the statutory consultees, mitigation measures are recommended to be integrated into the Plan.

Mitigation measures are the measures to prevent, reduce and as fully as possible offset any adverse environmental effects if there are found to be any adverse impacts as a result of implementing the LAP. The LAP proposes a number of measures under the headings of water and air & noise which if implemented will significantly (a) reduce the probability of surface water flooding and (b) reduce noise and air impacts from car travel. The LAP also proposes a number of new traffic/ pedestrian connections, which if implemented will enhance permeability and reduce the need to travel by car.

Mitigation for Air and Noise

The largest available land banks for development in the Plan area immediately adjoin the M50. Obtaining air and noise data from the Environmental Health section of the City Council significantly shaped the development strategy of the LAP. It became clear from the outset that while these lands are favourably located in the city, in an existing urban area and close to existing amenities and services, residential development immediately abutting the M50 is not desirable from a noise and air quality perspective. In order to strike a balance between the two factors, the LAP provides for a commercial buffer between future residential development and the M50. This will bring the residential development building line back from the M50. The Plan also requires the provision of a “green strip” of planting to the M50, with a focus on native trees (Objective GI3). New proposals will be required to submit a detailed assessment and mitigation strategy for noise and air as part of future planning applications (Objective UD14).

The LAP also proposes a number of traffic connections considered necessary to serve the area which will enhance permeability, improve legibility and movement through the area, thus reducing (i) the need to travel by car; (ii) the distance undertaken for car trips and (iii) queuing of cars/congestion.

Key connections include:

- (i) New north-south link public roadway linking Ballyfermot Road and Cherry Orchard Green, delivered as part of Site no. 1.
- (ii) Reserve lands for a future new public roadway over the railway link at the junction of Cherry Orchard Drive/ Avenue/ Parade.
- (iii) New pedestrian/ cycle connection over the Grand Canal in the vicinity of the Gallanstown Waterworks site.
- (iv) New Green link linking Le Fanu Park and the Canal.

These connections detailed under Section 4.5 of the LAP and provided for in the site briefs (chapter 5 where appropriate), will positively impact traffic in the area, and in turn reduce noise and air pollution impacts.

Mitigation for Water Issues

The ‘Opportunities and Constraints’ report prepared by Arup’s and meetings with the City Council’s Drainage Department and Irish Water formed the basis for mitigating measures required to facilitate additional development.

Surface Water

The LAP identifies a number of potential interventions to support opportunities to allow for Surface Water Management Protection of existing watercourses and to support opportunities to build further resilience into the surface water drainage network to aid the delivery of additional development in the area.

Potential interventions include: -

- (a) Support opportunities to allow for Surface Water Management Protection of existing watercourses and the reopening (re-lighting) of covered or culverted watercourses e.g. Gallanstown Stream, Blackditch stream and Galback streams.
- (b) Support opportunities to build further resilience into the surface water drainage network.

Whilst in general there is well developed infrastructure in the area, in order to service the identified development sites additional surface water infrastructure will be required in order to convey runoff from these sites to the existing surface water sewer network and connect to existing outfalls. A survey should be carried out to determine if the existing surface water infrastructure is adequate to serve the both the existing and future surface water volumes. Development within the LAP lands must take cognisance of the impact on downstream receiving watercourses, the Camac

River and the River Liffey, which discharges into Dublin Bay. It may be necessary to carry out upgrades of the existing surface water drainage network, pending a more detailed assessment of the capacity and condition of the existing infrastructure.

River Camac Drainage Catchment

The majority of the LAP lands fall within the River Camac Drainage Catchment. Dublin City Council's Environmental Services section are currently examining the River Camac under the Water Framework Directive as part of implementing the Camac Greenway. It is an objective of Dublin City Council to improve its status from "Poor Status" up to "Good Status". DCC WFM Strategy guidelines for developments proposals within the Camac Catchment, are included in the Local Area Plan.

It is an objective of the LAP to support the implementation of the Water Framework Directive to improve the status of the Camac, through implementing best practice SuDS and potential works to streams as part of any future development within the LAP area and to support and facilitate the upgrade of existing surface water infrastructure where possible (Objectives INF1, INF3).

SuDS Infrastructure

The development of the LAP lands affords the opportunity to implement best practice SuDS features in order to reduce the volume and increase the quality of outflow from the public open spaces and roads. One of the guiding objectives of the proposed Park West - Cherry Orchard Local Area Plan is "to create a vibrant and sustainable new urban area". The implementation of SuDS principles within the LAP lands will support this vision, ensuring that surface water is managed in a positive and sustainable manner within the lands, reclaiming water as an asset for the area. SuDS approaches are holistic in their management of surface water, considering not only the volume of water to be accommodated, but also the quality of this water as well as the amenity and habitat functions that these features can often perform.

A core objective of the strategy is to manage surface water in a sustainable way, ensuring there is no unacceptable residual risk of flooding to the LAP lands as well as ensuring no increased flood risk up or downstream of the lands. A fundamental pillar of the strategy is the provision of adequate levels of treatment of the surface water as it is proposed to discharge to existing watercourses. Surface water discharges shall be limited to 2l/s/ ha for proposed development. With the above objectives in mind, it is recommended that a SuDS treatment train approach be implemented across the LAP lands.

Potential SuDS Locations

Based on the SuDS strategy outlined above, the topography of the LAP lands, the flood risk identified within the LAP lands and the ground conditions encountered during the ground investigations which have been carried out within the LAP lands, the following areas have been identified as appropriate for SuDS features within public realm areas. The final location and design of these features will require further geotechnical assessment:

1. Public Road Cross-Sections

A number of existing roads within the LAP area, particularly the Park West Business Park and Industrial areas have cross sections which include trees and grassed verges and this provides the opportunity to implement SuDS features such as tree pits, street planters and swales as a source control measure whilst improving the landscape and amenity value of these areas.

The introduction of such features into the existing roads in the area which are wide such as Cherry Orchard Avenue shall also be explored as along with reducing the volume and increasing the quality of runoff they would greatly help improve the landscape and visual amenities of these areas.

2. Public Open Spaces

SuDS features should also be incorporated within public open spaces where appropriate to reduce the volume and increase the quality of runoff from these areas, as well as to improve their landscape and amenity value. A number of public open spaces exist within the LAP lands, in particular within the Cherry Orchard residential area. These public open spaces afford the opportunity to implement further SuDS features within the LAP lands.

Two significant public open spaces exist within the LAP lands, namely Cherry Orchard Park and Old Cherry Orchard Park. These areas afford the opportunity to implement larger SuDS features such as detention basins to collect runoff from public roads and public open spaces. Based on site specific investigation, infiltration trenches and basins could also be implemented in locations where the required infiltration rates can be achieved as well as swales to convey runoff through the open spaces.

Some additional potential interventions/objectives

There are a number of tributary streams that run through the LAP area which feed into the Camac River. In most instances, these streams are culverted through the LAP area. The LAP seeks to support opportunities to allow for Surface Water Management Protection of existing watercourses and the reopening (re-lighting) of covered or culverted watercourses as part of all new development e.g. Gallanstown Stream, Blackditch stream and Galback streams. There are significant potential benefits when daylighting streams especially within green corridors, allowing for the creation of ecological synergies between the fresh water systems within the LAP lands.

The development of the LAP lands also affords the opportunity to build further resilience into the surface water drainage network through the provision of an additional surface water sewer crossing under the railway tracks, or as may be required to support future developments subject to detail design.

No additional mitigation measures were considered necessary in order to implement the Park West - Cherry Orchard Local Area Plan. Indeed the provision of additional population and employment on brownfield sites, on a major public transport route is considered to have significant environmental benefits, encouraging sustainable travel patterns and offsetting the need to develop elsewhere outside the City on greenfield sites. The key principles and objectives of the LAP are fully in line with national and regional policy to consolidate and ensure a more compact city.

2.5.4 Monitoring

Article 10 of the SEA Directive sets out the requirement that monitoring is to be carried out of the significant environmental effects of the implementation of the Park West – Cherry Orchard Local Area Plan in order to identify at an early stage any unforeseen adverse effects and to be able to undertake appropriate remedial action.

Chapter 10 of the SEA Environmental Report outlines the monitoring requirements for the Park West – Cherry Orchard area. Methods of monitoring and indicators of change in the environment have been proposed with set targets to be reviewed mid-way through the LAP.

2.6 Submissions on the Draft LAP and Environmental Reports

The Draft LAP and associated environmental assessments were placed on public display for a period of 6 weeks (11th June to 22nd July inclusive), during which time submissions and observations were invited. A series of staffed public consultation sessions were also organised during this period to coincide with the consultation period, where planners were available to answer questions from members of the public.

A total of 126 no. submissions were received, including submissions from the Office of the Planning Regulator, the Department of Education and Skills, Department of Culture, Heritage and the Gaeltacht, Transport Infrastructure Ireland, National Transport Authority, Irish Water, the Office of Public Works, Inland Fisheries Board and South Dublin County Council. Below is a summary of the submissions received from the statutory authorities and how their recommendations were incorporated into the Plan. All of the public submissions and responses are set out in Chief Executive Report no. 275/19.

The Chief Executive's report on these submissions outlines the response and recommendation to the various submissions, with proposed additions shown in **green** (and bold), and deletions in **red** (and bold). The Members of the City Council accepted these recommendations at the Council meeting on the 7th October 2019, when they adopted the Plan.

2.6.1 Office of the Planning Regulator (OPR)

The OPR's submission notes that the Draft LAP was published in advance of the finalisation of the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly area, which addresses the national policies, and objectives of the NPF at a regional level.

Following the making of the RSES for the Eastern and Midland Regional Assembly, the Council is required to undertake a review of the Dublin City Development Plan 2016-22 to determine if it is consistent with the RSES and to commence a variation to the plan or the preparation of a new plan as appropriate.

Given these circumstances, the Council is requested to clearly state the interim status of the Park West-Cherry Orchard LAP and that it will be subject to a review exercise subsequent to the examination of the Dublin City Development Plan for consistency with the adopted RSES for the Eastern and Midland Regional Assembly. The OPR submission recommends the inclusion of a written objective to the effect of the above, in the LAP.

Chief Executive's Response:

The Regional Spatial and Economic Strategy (RSES) was adopted by the members of the Eastern Midlands Regional Assembly on the 3rd May 2019, and it came into effect on Friday 28th June 2019.

The Draft Park West – Cherry Orchard LAP was published for public consultation on 11th June 2019, having had full regard to the adopted RSES and future proofed accordingly. It is proposed that minor changes are made to the wording of section 1.3.2 of the Draft LAP to acknowledge the change in status from the RSES being adopted to being in effect.

DCC is preparing a report and variation on the implications of the RSES for the City Development Plan which will be brought to the Council this autumn. As per section 18(4)(b) of the Planning and Development Act 2000 (as amended) the LAP will remain in force following any variation to the DCDP, except should the Plan conflict with said variation, whereby Section 19(2B) of the Act shall apply, i.e. where any objective of the local area plan is no longer consistent with the objectives of a development plan for the area, the planning authority shall as soon as may be (no later than one year following the making or amending of the plan), amend the LAP to ensure consistency. As noted above given that the LAP had the advantage of being published following the adoption of the RSES, it is not anticipated that any amendments will be required. Any alterations that may arise will be carried out as per the Planning and Development Act 2000 (as amended).

Chief Executive's Recommendation:

The following recommendations were put and carried:

Proposed Amendment No. 1:

Amend Section 1.3.2 (page 5 & 6);

Delete: ~~The Eastern and Midland Regional Assembly issues a draft Regional Spatial and Economic Strategy for public consultation in November 2018, which was approved on 3rd May 2019.~~

Replace with: **The Regional Spatial and Economic Strategy which was approved by the Eastern and Midland Regional Assembly in May 2019 came into effect on the 28th June 2019.**

Final sentence of this paragraph: ~~Once adopted~~ **This** statutory plan will act as a twelve year strategic planning and investment framework for the Dublin City Metropolitan Area.

Image (page 5): replace the image showing the front cover of the Draft RSES with the final published document.

Amend text to image on page 6 showing the Dublin Metropolitan Area Strategic Plan, as follows: *Extract from ~~Draft~~ Regional Spatial & Economic Strategy*

2.6.2 Department of Education & Skills (DES)

The DES welcomed the provision of a primary school site as referenced in Chapter 5 (page 70 of the plan) and the location of this site adjacent to the proposed additional residential development within Park West.

The DES is of the view that there will probably be a requirement for a second primary school in the LAP area (the Cherry Orchard part of the area) should the projected population in all the identified sites materialise. The Department wishes to state that lands adjacent to existing schools should where possible be protected for future educational use to allow for expansion of these schools, subject to site suitability and agreement of the various stakeholders.

Additional post-primary school population will emerge from the development in the Park West/Cherry Orchard LAP area. The existing Ballyfermot post-primary schools may be able to cater for this additional demand or there may be a requirement to reserve a new post-primary school site in the adjoining Naas road brownfield area that could cater for both the additional population in Cherry Orchard/Park West and increased population emerging from any proposed additional development off the Naas road.

Chief Executive's Response:

Consultation between the LAP team and the DES during the pre-Draft stage led to provision being made for a new primary school site, as per section 4.7.5 of the Draft Plan and objective CS6 of the Plan: *It is an objective of Dublin City Council to seek the provision of a new primary school within Site No. 6, in conjunction with the Department of Education and Skills.*

With regard to the new proposal for a possible second primary school within Cherry Orchard, this provision does not currently form part of the Draft LAP. However taking on board the submission from the DES it is considered that there is sufficient space surrounding the existing St. Ultan's National School, which could accommodate an expansion to St. Ultan's and/or the provision of a new school. This land which is owned by the Diocesan Trust is currently fenced off as part of the existing school boundary lands. It is zoned Z15 in the Dublin City Development Plan which allows for future school provision. To take account of this change, additional/ amended text is proposed to be inserted into section 4.7.5 of the LAP.

What is also important in the context of providing for future school provision at this site is the interface between a new school building and the future redesign of Cherry Orchard Park. Given that the park is a priority project for the LAP, it will be important for the design team to liaise closely with the DES, the Diocesan Trust and the existing school to ensure the best outcome for all is achieved.

With regards to the future need for post-primary schools, it is considered that this can be accommodated in the “regeneration” lands to the south of the Canal, or indeed to the immediate east of the proposed new school site in Site No. 6, subject to rezoning and Masterplanning for this area. DCC will continue to work with the DES in preparing plans for these areas.

Chief Executive’s Recommendation:

The following recommendations were put and carried:

Proposed Amendment No. 2:

Amend, insert new text into Section 4.7.5 Education (page 53)

2nd Paragraph, amend as follows: Consultation with this Department during the LAP preparation phase has identified a clear need for an additional primary school(s) in the area.

Insert new text at end of this section: **In addition, the LAP supports the expansion of the existing St. Ultan’s NS and/or the provision of an additional primary school, within the Z15 lands surround the existing school. Currently underutilised these lands present a poor interface with the adjoining Cherry Orchard Park. It is considered that there is scope to provide new educational buildings which better relate to and make use of the adjoining park and its facilities.**

Amend Objective CS6 as follows: *It is an objective of Dublin City Council to seek the provision of a new primary school within Site No. 6, and the provision of additional primary school resources adjoining/ part of St. Ultan’s NS, in conjunction with the Department of Education and Skills.*

Proposed Amendment No. 3:

Inset text into Section 4.7.1 Cherry Orchard Park as follows (page 52):

3rd Paragraph: It is hence an objective of the LAP to carry out a complete redesign of the park, which will be subject to further detailed public consultation, with **the Department of Education and Skills, the Diocesan Trust**, the local school, clubs and sporting organisations, and to ensure that this work occurs in tandem with the provision of new housing provision in the area.

Proposed Amendment No. 4:

Inset a new bullet point into Chapter 5: Amenity Development Sites; A: Cherry Orchard Park Site, under the heading of Development Objectives for the Site (page 73):

- **The Department of Education and Skills have stated that there may be a requirement for additional primary level educational resources in Cherry Orchard. This could take the form of an extension to the existing St. Ultan’s NS or the provision of a new school. Consultation with this Department and with the Diocesan Trust will form an important role in determining the interface of the park with the adjoining school lands.**

2.6.3 Department of Culture, Heritage and the Gaeltacht

The Department of Culture, Heritage and the Gaeltacht referenced a set of broad policy principles for the protection of archaeological heritage as set out in a document Framework and Principles for the Protection of the Archaeological Heritage, published by the then Department of Arts, Heritage, Gaeltacht and the Islands in 1999. Some key policy principles set down in the Framework document should be followed:-

1. The National Monuments Acts will be used to the fullest possible extent, in accordance with relevant international conventions, to secure the protection of the archaeological heritage.

2. Gathering of information about the archaeological heritage should not destroy any more of that heritage than is absolutely necessary.
3. There should always be a presumption in favour of the avoidance of developments impact on the archaeological heritage.
4. Preservation in situ of archaeological sites must be presumed to be the preferred option.
5. Where archaeological sites or monuments have to be removed as a result of development it is essential that the approach of preservation by record be applied i.e. that there be appropriate archaeological excavation and recording.
6. Proper archaeological assessment can ensure that the most appropriate approach to archaeological preservation is adopted.

Chief Executive's Response:

The LAP lands contain one known national monument, located in the vicinity of the Crescent apartment building at Park West, and believed to be an early Christian burial mound, see Section 2.8 Natural and Built Heritage: Archaeology and Section 4.8.2 Archaeological Heritage of the LAP; and Section 3.8.3 Archaeology of the SEA Environmental Report.

Due to the proximity of sites 6, 7 and 8 to this known National Monument, the LAP contains the following Objective, H2:

It is an objective of Dublin City Council to safeguard known National Monument sites and to agree strategies for the protection of potential future sites in conjunction with the City Archaeologist, with particular reference to Sites 6, 7 and 8.

In addition the site brief for Site no. 6 specifically states that archaeological testing shall be required.

Taking on board the submission from the Department of Culture, Heritage and the Gaeltacht, it is proposed to make minor amendments to the wording of the development objectives for Site no. 6, and to insert the same amended wording into the development objectives for Sites 7 and 8 in Chapter 5.

Chief Executive's Recommendation:

The following recommendations were put and carried:

Proposed Amendment No. 5:

Amend text in Chapter 5: Site Brief, Site no. 6; Development Objectives for the Site (page 70), as follows:

- Archaeological testing shall be required **in keeping with the Framework and Principles for the Protection of the Archaeological Heritage (Department of Arts, Heritage, Gaeltacht and the Islands, 1999).**

Proposed Amendment No. 6:

Insert the following bullet point into Chapter 5: Site Brief, Site no. 7; Development Objectives for the Site (page 71), as follows:

- **Archaeological testing shall be required in keeping with the Framework and Principles for the Protection of the Archaeological Heritage (Department of Arts, Heritage, Gaeltacht and the Islands, 1999).**

Proposed Amendment No. 7:

Insert the following bullet point into Chapter 5: Site Brief, Site no. 8; Development Objectives for the Site (page 72), as follows:

- **Archaeological testing shall be required in keeping with the Framework and Principles for the Protection of the Archaeological Heritage (Department of Arts, Heritage, Gaeltacht and the Islands, 1999).**

2.6.4 Transport Infrastructure Ireland (TII)

The TII submission makes reference to the previous TII submission to the pre-draft stage of the Park West Cherry Orchard LAP by letter issued on 26 February 2018 (TIL-1800775).

In reviewing the Draft LAP, the TII submission notes in particular, Chapter 1: Introduction and Policy Context; Chapter 2: Local Area Context and Analysis, subsection 2.9.1 Transport and Movement; Chapter 4 Local Area Plan Development Strategy, section 4.5 Access and Movement Strategy. TII has also reviewed the Strategic Environment Assessment (SEA) accompanying the Draft LAP.

TII recognises that a draft development strategy that subdivides the LAP area into smaller "sites" is presented. In this regard, site nos. 3a, 4, 7 and 8, indicated for low to medium density development, are located adjacent to the M50. It is submitted that the location of the Draft LAP area relative to the M50 that acts as the western boundary of the LAP area does not appear to be reflected in the LAP in accordance with TII's earlier submission.

TII's earlier submission recommended the identification of noise mitigation measures for those areas adjacent to the M50 that are indicated for development and may be considered a sensitive noise receptors. It is acknowledged that section 4.6.7 reflects the submission in this regard; "Noise/Air pollution mitigation will need to be designed into the layout of developments adjacent to the M50. All planning applications for development proposals adjoining the M50 and the railway line shall submit a detailed assessment and mitigation strategy for noise and/or air quality."

Chief Executive's Response:

The LAP team received a submission from TII during the pre-draft stage of the LAP as referred in the TII submission on the Draft LAP. The pre-draft submission has informed the preparation of the Draft LAP.

In this regard noise and air pollution was carefully considered as part of the development strategy for the Park West Cherry Orchard area, in particular the Land Use Strategy for the LAP. The TII submission acknowledges that section 4.6.7 reflects the pre-draft submission in this regard; "Noise/Air pollution mitigation will need to be designed into the layout of developments adjacent to the M50. All planning applications for development proposals adjoining the M50 and the railway line shall submit a detailed assessment and mitigation strategy for noise and/or air quality."

The Noise/Air pollution mitigation requirements identified for development sites adjacent to the M50 as per above will be required to be addressed as part of the final design / layout proposals for these development sites. This requirement is further supported by section 4.6.7 Building Design and Quality and objective UD14 where it is an objective of the LAP "To seek the submission of detailed assessment mitigation strategy for noise and/or air, for all development proposals adjoining the M50 or railway line, as part of future planning applications."

Chief Executive's Recommendation:

The following recommendations were put and carried:

Proposed Amendment No.8:

Amend, insert text into Section 4.6 Urban Form and Design Strategy (page 51), Objective UD14 as follows:

“To seek the submission of detailed assessment mitigation strategy for noise and/or air **quality**, for all development proposals adjoin the M50 or railway line, as part of future planning applications.”

2.6.5 National Transport Authority (NTA)

The NTA’s submission makes reference to their submission to the pre-draft stage of the Park West Cherry Orchard LAP and states that the NTA is satisfied that their recommendations have been brought forward into the Draft LAP. The submission also states that the Draft LAP is consistent with the Transport Strategy for the Greater Dublin Area 2016-2035, and only proposes some minor text suggestions to update / clarify on current investment priorities for transport infrastructure to serve the LAP lands.

Bus Connects:

In relation to the Bus Connects project the NTA make the following suggestions: The NTA submission states that while there are a number of strands to the Bus Connects programme, it is the (Core Bus Corridors (CBC) and the Metropolitan Bus Network Review that are most relevant to the planning process. As such it would be best to express these strands separately within the LAP.

The Liffey Valley (CBC) project, as currently perceived, will deliver full bus priority along Ballyfermot road running along the northern boundary of the LAP delivering benefits to the Plan area by delivering reduced journey times for residents and employees in the PARK West Cherry Orchard area Design and planning work is ongoing for this project and an application to An Bord Pleanála is expected in 2020.

In addition and separately to the above, the ongoing Metropolitan Bus Network Review is seeking to enhance the level of service within the plan area in relation to the existing 79/A bus service providing improved links to the Cherry Orchard train station. A revised second draft (to be published in September 2019) is likely to further improve the offer for the Plan area in terms of frequency and connectivity to the city centre, heavy rail and LUAS. The revised network will also be more adaptable than the existing network in terms of its ability to expand and serve developing areas such as Parke West Cherry Orchard making use of emerging new links / roads as proposed within the Draft LAP.

DART Expansion:

As part of the DART expansion program, the NTA intends to deliver DART levels of service along the Dublin Kildare railway line using battery electric carriages which can run at higher speeds and higher frequencies than the existing diesel engines - in advance of the electrification and DART underground.

In addition to the above updates the NTA also make the following recommendations to clarify text in relation to two of the Movement Objectives:

MO13 – include reference to the National Cycle Manual

MO14 - insert the word “local” before "Park and Ride"

Chief Executive’s Response:

Consultation between the LAP team and the NTA during the pre-Draft stage led to many of the recommendations from the NTA being brought forward through many of the Movement Objectives of the Plan MO1 – MO15 along with a number of the Urban Design objectives of the Plan UD4, UD8 and UD10. As such the Plan is considered to be consistent with the NTA Transport Strategy for the Greater Dublin Area 2016-2035 by both the NTA and DCC. However, the Council is

requested to update the Plan with some minor text suggestions to update / clarify on current investment priorities for transport infrastructure to serve the LAP lands as per below:

Chief Executive's Recommendation:

The following recommendations were put and carried:

Proposed Amendment No. 9:

Amend Section 4.5.6 Movement Objectives (page 46);

Insert text into Objective MO13 as follows:

MO13: To ensure that all development proposals for new roads, streets and residential layouts comply with the 'Design Manual for Urban Roads and Streets' (DMURS, 2013) **and the NTA National Cycle Plan focusing** on the needs of pedestrian, cyclists and public transport.

Proposed Amendment No. 10:

Amend Section 4.5.6 Movement Objectives (page 46);

Insert text into Objective MO14 as follows:

MO14: To explore the potential for car parking facilities including **local** Park and Ride near Park West – Cherry Orchard train station.

Proposed Amendment No. 11:

Amend, insert new text into Section 4.5.3.1 Public Transport – Rail and LUAS (page 43)

Insert new text at end of this section: **As part of the DART expansion program, the NTA intends to deliver DART levels of service along the Dublin Kildare railway line battery electric carriages which can run at higher speeds and higher frequencies than the existing diesel engines. This will allow enhanced levels of service to operate along the line in advance of electrification and in advance of the DART underground.**

Proposed Amendment No. 12:

Amend, insert new text into Section 4.5.3.2 Public Transport – Bus (page 44)

Insert new text into para 2 section 4.5.3.2 creating two new additional paragraphs:

The National Transport Authority (NTA) is in the process of redesigning Dublin's bus system under the 'Bus Connects' project which will identify a network of high quality radial and orbital bus corridors. The project which aims to overhaul the current bus network system in the Dublin region has implications for the Park West – Cherry Orchard area which will avail of a high frequency bus network better connecting the area to the City Centre and other areas of the city such as University College Dublin. **While there are a number of strands to the Bus Connects programme, it is the (Core Bus Corridors (CBC) and the Metropolitan Bus Network Review that are most relevant to the planning process.**

The Liffey Valley (CBC) project, as currently conceived, will deliver full bus priority along Ballyfermot road running along the northern boundary of the LAP delivering benefits to the Plan area by delivering reduced journey times for residents and employees in the PARK West Cherry Orchard area Design and planning work is ongoing for this project and an application to An Bord Pleanála is expected in 2020.

In addition and separately to the above, the ongoing Metropolitan Bus Network Review is seeking to enhance the level of service within the plan area in relation to the existing 79/A bus service providing improved links to the Cherry Orchard train station. A revised second

draft (to be published in September 2019) is likely to further improve the offer for the Plan area in terms of frequency and connectivity to the city centre, heavy rail and LUAS. The revised network will also be more adaptable than the existing network in terms of its ability to expand and serve developing areas such as Parke West Cherry Orchard making use of emerging new links / roads as proposed within the Draft LAP.

~~It will involve slight alterations to existing routes through the area however the Draft Bus Connect Review published in 2018 envisaged that frequency of services in the area will be every 10 to 15 minutes along with faster, more reliable and predictable bus journeys.~~ The City Council will continue to work with and support the NTA in planning and implementing improvements and enhancements to the public transport network in the area.

2.6.6 Irish Water (IW)

The IW submission requests a number of minor text changes be made within section 4.10.3 Foul Drainage Infrastructure, to provide better clarity regarding some of the terminology used within the Plan. The submission also provides an update with regards to the current studies and surveys that are being undertaken to prepare a Drainage Area Plan model for the area, and requests for additional text to be added to the Plan. The current estimated date for completion of the study is the end of 2020.

The IW submission also requests minor text changes to be made within section 4.10.4 Water Supply and provides updated text that further outlines IW strategy and objectives under the National Water Resource Plan (NWRP) to replace the existing 3rd paragraph.

Chief Executive's Response:

Consultation between the LAP team and IW has been ongoing during the pre-Draft stage. It was agreed that further surveys and studies would be required to determine if the existing foul drainage infrastructure would be adequate to serve both the existing and future volumes. The IW submission on the Draft LAP provides an update with regards to the current studies and surveys that are being undertaken to prepare a Drainage Area Plan model for the area, which can now be added to the relevant section of the Plan

Chief Executive's Recommendation:

The following recommendations were put and carried:

Proposed Amendment No. 13:

Amend and replace with new text as per below into Section 4.10.3 Foul Drainage Infrastructure (page 60);

Paragraph 2: Amend and replace text: Each of these boundaries provides physical constraints to the provision of new ~~surface-water~~ **waste water** infrastructure and the creation of new outfalls.

Paragraph 4: Amend and replace text: In order to service the identified development sites additional foul drainage infrastructure will be require to convey ~~runoff~~ **waste water** from these sites to the existing sewer network and connect to existing outfalls.

Paragraph 4: Insert additional new text at the end of paragraph: **IW are currently undertaking studies and the surveys to prepare a Drainage Area Plan and model for the area. The report and model will identify the main issues and propose solutions for same. The current estimated date for completion of the study is the end of 2020**

Proposed Amendment No.14:

Amend and replace with new text as per below into Section 4.10.4 Water Supply (page 60):

Paragraph 2 remove text: However, as a result of the piecemeal and incremental nature of how the area has developed it is necessary to review the LAP area in terms of the supply/capacity for **both** water

Paragraph 3: Remove and replace paragraph with new text: ~~Following further correspondence and feedback from Irish Water, it has been confirmed that there is a good water supply network in the area and there is good water supply network available. However, some of the existing older watermains (1950s/1960s) may need upgrading.~~

As developments progress, Irish Water will need to model the required demand for water against latest network demands to ascertain local network upgrade requirements. New connections may be assigned on a first come, first served basis until any necessary capital works are completed. Local works will be developer led. Developers should engage early with IW through the IW New Connections or Pre-Connection Enquiry Process. IW will then assess and review the local network to develop a solution/options for the developer's proposals.

In line with Irish Water and RSES Objectives, the Water Supply Project for the East and Midlands Region, is key to securing a robust water supply for the region in the longer term. Irish Water is preparing for the future by developing the National Water Resources Plan (NWRP). The strategic plan for water services will outline how we move towards a sustainable, secure and reliable public drinking water supply over the next 25 years, whilst safeguarding the environment. The NWRP will outline how Irish Water intends to maintain the balance between the supply from water sources around the country and demand for drinking water over the short, medium and long-term. This will allow preparation for the future and ensure the provision of sufficient safe, clean drinking water to facilitate the social and economic growth of our country

2.6.7 The Office of Public Works (OPW)

The OPW submission notes that there is a history of pluvial flooding in the area of Park West - Cherry Orchard and a history of fluvial flooding on parts of the Camac River to the south of the development area. The OPW acknowledge Dublin City Councils commitment to adhere to the Planning System and Flood Risk Management Guidelines within the SFRA provided.

The OPW recommend that capacity of the culverted sections of the Blackditch Stream, Galback Stream and Gallanstown Stream may need to be assessed to ensure that they are suitable to convey any additional runoff/flows from the proposed development sites. It may be particularly important to ensure that at any pinch points (such as the railway line crossing) are suitably designed to ensure that they are protected from blockages of any kind.

Chief Executive's Response:

It is considered that the above recommendation is already covered more broadly within section 4.10.1 Proposed Surface Water Drainage Infrastructure. However, there is merit in making specific reference to the culverted sections of the Blackditch Stream, Galback Stream and Gallanstown Stream along with specific references to any pinch points (such as the railway line crossing) in order to highlight the importance of these as part of the overall assessment of the existing Surface Water Drainage Infrastructure.

Chief Executive's Recommendation:

The following recommendations were put and carried:

Proposed Amendment No. 15:

Amend and replace with new text as per below into Section 4.10.1 Surface Water Drainage Infrastructure (page 59);

Para 1: Insert additional new text as follows: A survey should be carried out to determine if the existing surface water infrastructure is adequate to serve both the existing and future surface water volumes, **in particular the capacity of the culverted sections of the Blackditch Stream, Galback Stream and Gallanstown Stream and the culverted pinch point at the railway may need to be assessed to ensure that they are suitable to convey any additional runoff/flows from the proposed development sites and to ensure that they are suitably designed so that they are protected from blockages of any kind.**

2.6.8 Inland Fisheries Board

The LAP needs to protect the aquatic environment through protection of water quality, hydrological processes, biodiversity and protection of the physical environment. The LAP should protect existing natural floodplains and avoid development in such.

The LAP must demonstrate that there is sufficient capacity in the receiving sewerage drainage system and sufficient treatment capacity within the receiving waste water treatment plants to protect the integrity of the receiving waters at the point of discharge.

Under the EU Water Framework Directive (WFD) (2000/60/EC) DCC is legally obliged to protect the ecological status of river catchments and channels. Development within the LAP lands, adjacent to waterways (riparian buffer zones) should be managed so as to lessen the impact on these habitats, for example river corridors / buffer zones with a recommended minimum 10m undisturbed zone. The Plan should also include a clear policy on the use of clear span structures over fisheries waters to minimise the impact on fish passage and water flows.

Chief Executive's Response:

A number of tributaries of the River Camac flow through the LAP lands as indicated in Fig 28: Existing Watercourses of the LAP and also in the SEA and Flood Risk Assessment. Currently all of the existing watercourses that flow through the LAP lands are culverted and mostly located in existing built up areas.

It is an objective of the LAP to support the implementation of the Water Framework Directive to improve the status of the Camac, through implementing best practice SuDS and potential works to streams as part of any future development within the LAP area and to support and facilitate the upgrade of existing surface water infrastructure where possible.

Objective INF3: Support the Water Framework Directive for the rehabilitation of the Camac River through implementation of best practice SuDS infrastructure throughout the LAP lands in order to improve quality and control of outflow to the river Camac from the LAP land.

Proposed amendments above responding to OPW and Irish Water are considered to address concerns relating to surface and foul water issues.

A riparian / buffer zone is as per the submission a vegetated area near a stream, which helps shade and partially protect a stream from the impact of adjacent land uses and it plays an important role in protecting and improving the water quality in associated watercourses. The LAP currently contains a riparian zone along the banks of the Grand Canal. Section 4.9.2 Proposed Green Infrastructure and Biodiversity Strategy, sets out three core green routes to be provided as part of the Plan, including along the northern boundary of the Grand Canal. This section states: *"In order to fully optimise the potential of the Grand Canal to act as a 'green corridor' it is imperative that any future development along its bank is set back to fully optimise its potential as a recreational amenity and as a biodiversity resource for the City. This is of particular importance for any proposals to develop the Gallanstown Waterworks Site.* It is proposed to insert new text into the above paragraph to require a minimum of a 10m set back from the water's edge, and to ensure that any new bridges allow for clear passage of fish and water flows.

Chief Executive's Recommendation:

The following recommendations were put and carried:

Proposed Amendment No. 16:

Insert new text into Section 4.9.2 Proposed Green Infrastructure and Biodiversity Strategy; 2. Along the north boundary of the Grand Canal, (page 56):

In order to fully optimise the potential of the Grand Canal to act as a "green corridor" it is imperative that any further development along its bank is set back a **minimum of 10 metres from the water's edge** to fully optimise its potential as a recreation amenity and as a biodiversity resource for the City. This is of particular importance for any proposals to develop the Gallanstown Waterworks site. **The provision of a new pedestrian/ cycle bridge at this location shall ensure that any new structures put in place do not impact on fish passage or water flows.**

(Additional amendments to this section were made following public submissions, under the heading of Green Infrastructure).

2.6.9 South Dublin County Council (SDCC)

South Dublin County Council (SDCC) welcomes and supports the LAP, and acknowledges that it is in accordance with the NPF and the RSES with regards to the vision for the lands. The submission notes that the rezoning of the lands to the south of the LAP within SDCC, from "EE" enterprise and employment to "REGEN" has been adopted by the Elected Members of SDCC and is now in effect. The submissions recommends that DCC considers the significant ongoing projects in the area and SDCC future plans for the Ballymount / Naas Road 'REGEN' zoned lands. It also refers to the URDF funding secured by both DCC and SDCC and the ongoing joint research and analysis of the industrial lands in both administrative areas.

The submission outlines a number of key issues for consideration, notably:

- Connectivity and Permeability – SDCC acknowledges and supports the provision of a new pedestrian/ cycle routes as shown set out in the LAP at the Gallanstown Waterworks site, and is supportive of future enhanced connections in light of the new 'REGEN' zoned lands to the south east of the LAP.
- Education Facilities – SDCC welcomes and supports the provision of a new primary school on Site No. 6 in the Draft LAP. The submission also acknowledges that future engagement between DCC, SDCC and the Department of Education and Skills is required in considering the wider context.
- Grand Canal Greenway - Welcomes and support proposals within the LAP to enhance linkages to the Grand Canal Greenway and the provision of recreational and sporting use, but cautions on the need on the need for ecological and environmental amenity to also be a priority.
- Scale and Density – the submissions is supportive of the scale and density proposed within the LAP, which optimises the opportunity to develop these strategically located brownfield sites that are well served by public transport.
- SDCC recommends that DCC, in preparing the final LAP, considers the significant ongoing projects in the area and SDCC future plans for the Ballymount / Naas Road 'REGEN' zoned lands.

Chief Executive's Response:

Taking on board that the proposed rezoning of lands to the immediate south of the LAP are now adopted and in effect, it is proposed that the LAP is amended accordingly to reflect this. Changes are proposed to the text under section 1.3.5 Other Relevant Plans & Policy; South Dublin County Council, and to Figures 9 and 10 which shows the land use plans for both DCC and SDCC (page 9 and 10).

The City Council is working in partnership with SDCC following the allocation of funding under the URDF scheme which is examining opportunities and constraints within DCC's "Z6" lands at Park West Industrial Park, and wider industrial zoned lands, in conjunction with SDCC newly zoned "regen" lands. As part of this process we will examine issues of further enhanced connectivity, school provisions etc. to serve this wider area, outside of the LAP lands.

With regard to the need to protect the ecological and environmental amenity of the canal, it is considered that the proposed amendments No. 16 (above) and No.32 (below), adequately addresses this concern.

Chief Executive's Recommendation:

The following recommendations were put and carried:

Proposed Amendment No. 17:

Amend Section 1.3.5 Other Relevant Plans & Policy; South Dublin County Council (page 9).

Delete the second paragraph:

~~In December 2018, South Dublin County Council commenced the formal process to amend the zoning objective of approximately 178 hectares of land from zoning objective EE (Enterprise and Employment) to objective REGEN (Regeneration) under the "Proposed Variation No. 3 – Zoning Amendment to Lands at Ballymount / Naas Road", see Fig. 9. These lands are located in the Ballymount/ Naas Road area, which are south of the Grand Canal and east of the M50, adjoining the boundary with Dublin City Council. The proposed variation seeks a plan led approach, including provision for a new Local Area Plan, to provide a framework for the sequential and phased development of these lands. The closing date for public submissions on this (amended) variation was 29th March 2019.~~

Replace with:

While the lands to the immediate south of the LAP and abutting the M50 are zoned for enterprise and employment, it is of significance to note to that South Dublin County Council recently rezoned 178 hectares of land in the Ballymount / Naas Road area from enterprise and employment to "REGEN" (regeneration), which came into effect on the 7th May 2019. This variation to the South Dublin County Development Plan 2016-2022 contains a Specific Policy Objective, CS6 SLO 1, to initiate a plan led approach to the sustainable regeneration of the brownfields lands in the Naas Road/ Ballymount REGEN zoned lands, with a view preparing a LAP or other appropriate mechanism for regeneration. Dublin City Council and South Dublin County Council are currently working together carrying out detailed analysis of these REGEN lands and the City's "Z6" lands north and south of the Canal.

Delete **Fig. 9: Extract from South Dublin County Council Proposed Variation No. 3.**

Amend Fig 10: Dublin City Development Plan 2016-2022 merged with South Dublin County Council Development Plan 2016-2022; to show the newly adopted "REGEN" zoned lands.

Non-Material Changes

The above changes and others set out in Chief Executive Executive's reports no. 275/19 and 276/19, were deemed to be non-material to the Local Area Plan.

3 Consideration of Alternatives

3.1 Introduction

This section describes the alternative scenarios considered for the Park West – Cherry Orchard Local Area Plan, as set out in Chapters 6 and 7 of the SEA Environmental Report which accompanied the Draft LAP.

The issue of alternatives is a critical function of the SEA process and necessary to evaluate the likely environmental consequences of a range of alternative development strategies for the plan area, within the constraints imposed by environmental conditions. The SEA Statement reflects the content of Section 20(3)(f) of the Planning and Development Act 2000, as amended.

3.2 Legislation Context

Article 5 of the SEA Directive requires the consideration of reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme and the significant environmental effects of the alternatives proposed. It states under Article 5(1) that: -

‘Where an environmental assessment is required under Article 3(1), an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. The information to be given for this purpose is referred to in Annex I.’

In accordance with SEA guidelines the alternatives put forward should be reasonable, realistic and capable of implementation. They should also be in line with the appropriate strategic level at which the Plan will be implemented within the national and City planning hierarchy. The Park West – Cherry Orchard Local Area Plan will be framed within a policy context set by a hierarchy of National, Regional and City level strategic plans as well as the Irish and European legislative framework. Therefore the options for alternatives are limited, and a scenario such as the ‘do-nothing’ situation was not included as it is neither reasonable nor realistic.

The alternatives proposed have been assessed against the relevant Environmental Protection Objectives (EPOs) established for the key aspects of the environment likely to be affected by the Plan’s implementation. The evaluation process resulted in the identification of potential impacts and informed the selection of the preferred development scenario for the Park West – Cherry Orchard LAP.

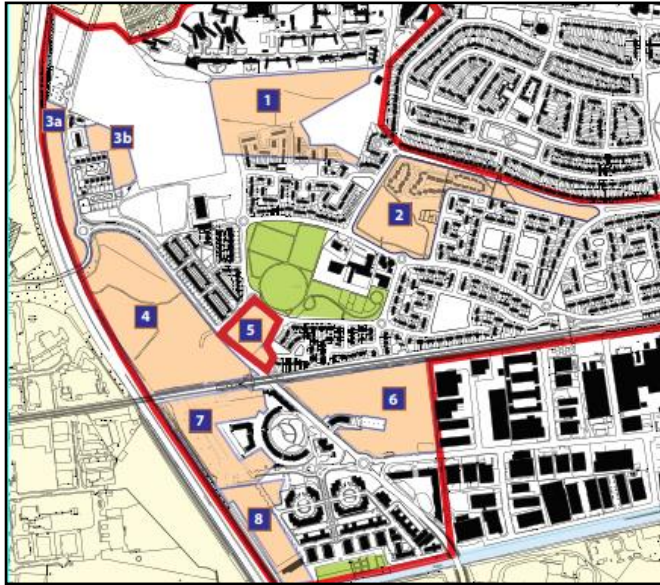
3.3 Reason for Choosing the Alternatives as Chosen for the (Draft) LAP

This section summarises Section 6 and 7 of the Environmental Report which evaluates the various Alternatives chosen and their impact on the Environmental Protection Objectives as set out in Section 4 of the Environmental Report.

Article 5 of the SEA Directive requires the plan-making authority to identify, describe and evaluate alternative ways of realising the objectives of the plan. As stated in the Directive an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated.

For the Park West – Cherry Orchard LAP, the alternatives were based on three of the key development sites in the LAP area and the scope of opportunities that they could offer.

3.3.1 Alternative No. 1: Site No. 5 Barnville Site (South of Cherry Orchard Park)

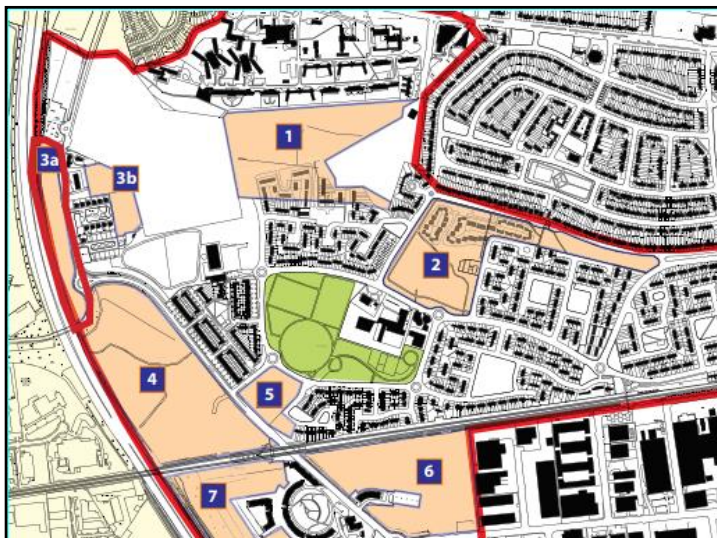


Alternative 1A – To develop the site as a neighbourhood centre (with convenience retail shopping).

Alternative 1B – To develop the site for predominantly residential use.

Alternative 1B was chosen as it will 'fill in' a prominent site adjoining existing residential estates. Residential use can more favourably protect the existing residential amenity as opposed to a neighbourhood centre which will bring its own use constraints – loading / servicing requirements, blank gables, traffic, long operating hours etc. Other sites were considered more suitable for retail facilities, adjoining existing local amenities at a local level, and adjoining the railway line at the higher convenience shopping level.

3.3.2 Alternative No. 2: Site no. 3a, M50 Cloverhill Road Site

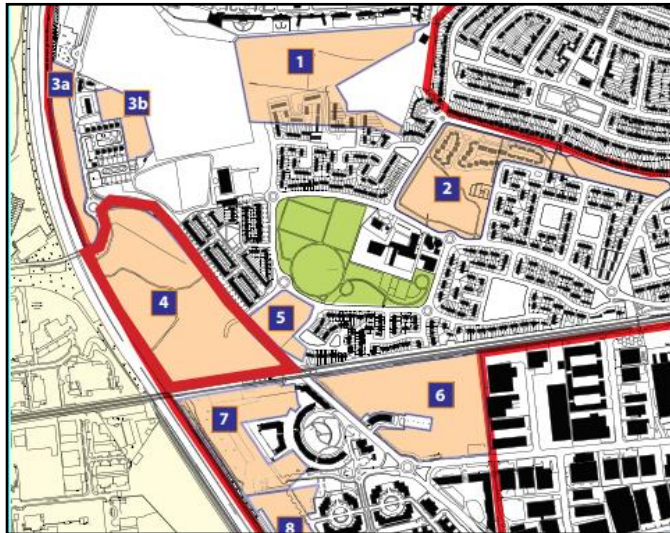


Alternative 2A – To develop the site for residential uses only.

Alternative 2B - To develop the site for enterprise and employment uses.

Alternative 2B was chosen, on the grounds that the site immediately abuts the M50 and the air and noise pollution concerns were too great to support residential development. Additionally given the amount of housing land available in the LAP area it is considered beneficial to provide land for enterprise and employment uses for the existing and future residents.

3.3.3 Alternative no. 3: Site No. 4, M50: Cedarbrooke Avenue Site



Alternative 3A – To develop the residential portion for high density only.

Alternative 3B – To develop the residential portion for a mix / range of densities.

Alternative 3B was chosen in order to provide a more flexible development approach to assist this challenging area. Identifying this from the outset in a systematic and logical manner provides greater certainty for the market, state agencies and the local people.

3.4 Environmental Assessment of Alternatives

Section 7 of the Environmental Report sets out the evaluation process of the various alternatives, carried out for the Draft LAP. Each of the alternatives was evaluated against Environmental Protection Objectives (EPOs) previously identified in Section 4 of the Report. The EPO's are outlined below in Table 2.

Table 2 Environmental Protection Objectives

Environmental Protection Objectives	
ENVIRONMENTAL RECEPTOR	ENVIRONMENTAL PROTECTION OBJECTIVE
Population and Human Health	<p>PHH To create a sustainable compact city in which to live, work and/or visit.</p> <p><i>(other EPOs relating to population and human health are covered under each of the environmental headings below)</i></p>
Biodiversity/Flora & Fauna	<p>BFF To protect and where appropriate enhance the diversity and range of habitats, species and their resources within the LAP area.</p>
Air Quality & Noise	<p>AN1 To protect good air quality status and minimise all forms of air pollution (i.e. Nitrogen oxides & Particulate Matter).</p> <p>AN2 To maintain and, where possible, improve the good acoustical quality for the current and future residents of the plan area.</p>
Climatic Factors	<p>CF To minimise emissions of greenhouse gases.</p>
Water	<p>W1 To comply with EU Water Framework Directive to ensure and maintain good ecological status of all receiving water in the LAP area.</p> <p>W2 To reduce and manage the risk of flooding.</p> <p>W3 To provide adequate wastewater treatment, water distribution and drainage networks.</p>
Material Assets	<p>MA1 To reduce traffic levels by encouraging modal change from car to more sustainable modes of transport such as public transport, walking & cycling.</p> <p>MA2 To reduce the generation of waste and adopt a sustainable approach to waste management.</p>
Cultural Heritage	<p>CH To protect and conserve the cultural heritage including the built environment and settings; archaeological (recorded monuments, architectural structures, materials and urban fabric) and manmade landscape features.</p>
Landscape & Soils	<p>LS To protect and where appropriate enhance the character, diversity and special qualities of Park West – Cherry Orchard landscapes and soils.</p>

The impact of each alternative was assessed against the EPO's using the following assessment key: -

Table 3

SYMBOL	IMPACT ON THE ENVIRONMENTAL PROTECTION OBJECTIVE
+	Significant Beneficial Impact
?	Uncertain impact
x	Significant Adverse Impact
0	No Relationship, or Insignificant Impact

The evaluation of the various alternative scenarios was tested against the EPOs and this was detailed in Section 7.2 of the Environmental Report.

The tables set out below provide a summary of the three key sites (See also section 7.3.1 – 7.3.3 of the Environmental Report): -

3.4.1 Alternative No. 1: Site No. 5: Barnville Site

Table 4 below summarises the environmental assessment of the alternatives considered for Site No. 5, Barnville Site.

Table 4: No. 1 Alternative Summation of Evaluation

EPO	Alternative 1A To develop the site as a neighbourhood centre	Alternative 1B To develop the site for residential uses only
PHH	+	+
BFF	+	+
AN1	+ / x	+
AN2	x	0
CF	+ / x	+ / x
W1	+	+
W2	+	+
W3	+ / x	+ / x
MA1	+	+
MA2	0	0
CH	0	0

LS	+	+
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Alternative Chosen 1B: Given the location of the site adjoining existing residential developments of Barnville Park and Cedar Brook and facing the existing Cherry Orchard Park, the LAP favours residential use for this site. This will 'fill' in this important and visible site and improve the legibility of the adjoining residential estates, while also protecting the existing residential amenities by relocating the neighbourhood centre and commercial uses to more favourable sites.

3.4.2 Alternative No. 2: Site No. 3a, M50 – Cloverhill Road Site

Table 5 below summarises the environmental assessment of the alternatives considered for Site 3a.

Table 5: No. 2 Alternative Summation of Evaluation

EPO	Alternative 2A To develop the site for residential uses only.	Alternative 2B To develop the site for enterprise and employment uses.
PHH	+	+
BFF	+ / x	+ / x
AN1	+ / x	+ / x
AN2	x	+
CF	+ / x	+ / x
W1	+	+
W2	+	+
W3	+ / x	+ / x
MA1	+	+
MA2	0	0
CH	0	0
LS	+	+

Alternative Chosen 2B: Having regard to the site's location immediately adjoining the M50 and the noise and air pollution information from Section 3 of the SEA, the LAP does not support the use of this site for residential development. Positioning houses right beside the M50 would negatively impact the future residents' health and well-being. Furthermore taking account the need to create additional local employment and availability of housing land in the LAP it is considered that this site should be utilised for enterprise and employment uses.

3.4.3 Alternative No. 3: Site no. 4, M50- Cedarbrook Road site

Table 6 below summarises the environmental assessment of the alternatives considered for the largest development site, to the north of the train station, site No. 4, M50- Cedarbrook Road site.

Table 6: No. 3 Alternative, Summation of Evaluation

EPO	Alternative 3A To develop the residential portion for high density only.	Alternative 3B To develop the residential portion for a mix/range of densities.
PHH	+	+
BFF	+	+
AN1	+	+ / x
AN2	+	+
CF	+ / x	+ / x
W1	+	+
W2	+	+
W3	+ / x	+ / x
MA1	+	+ / x
MA2	0	0
CH	0	0
LS	+	+

Alternative Chosen 3B: During the LAP preparation process all of the vacant sites in Park West – Cherry Orchard were reviewed. Given the amount of housing land available in the area and the lack of development in this area of the city it is considered that the LAP should support the a mix or range of densities on a large, key site to ‘kick-start’ development in the area and leverage the existing services and facilities.

4 Monitoring Measures and Reporting

4.1 Introduction

Article 10 of the SEA Directive requires that monitoring should be carried out in order to identify at an early stage any unforeseen adverse effects due to the implementation of the Plan, and to be able to take remedial action if required. Monitoring is carried out by reporting on a set of indicators which enable positive and negative impacts on the environment to be measured. Environmental targets and indicators were developed during the SEA process and were developed during the SEA and the preparation of the Plan; see Section 4 of the Environmental Report. The monitoring is based on these indicators.

Section 10 of the Environmental Report (Table 22 of ER and see also Appendix 1 below) sets out the Monitoring Programme. The monitoring programme has been devised having regard to the existing monitoring systems in place and in use by Dublin City Council. Monitoring plays an important role in assessing whether the LAP is achieving its environmental objectives and targets, whether these need to be re-examined and whether the proposed mitigation measures are being implemented. It also enables at an early stage, the identification of any unforeseen adverse effects and enables appropriate remedial action to be taken.

The monitoring programme is subject to review at each reporting stage to reflect new data. Should this identify significant adverse impacts (such as impacts on designated sites etc) early on in the implementation of the LAP, this should trigger a review of both the LAP and associated monitoring programme. All information gathered from planning applications and reports submitted which include information on any surveys carried out or environmental constraints mapping should be integrated into the monitoring programme.

4.2 Indicators and Targets

This section sets out the proposed monitoring measures in accordance with Article 10 of the SEA Directive which requires that “*significant environmental effects of the implementation of plans and programmes in order, inter alia, to identify at an early stage unforeseen effects, and to be able to undertake appropriate remedial action*”. A monitoring programme has been devised having regard to the existing monitoring systems in place and in use by Dublin City Council.

4.3 Data Sources

Measurements for indicators generally come from existing monitoring sources, such as those maintained by Dublin City Council and other relevant authorities, e.g. the Environmental Protection Agency (EPA), the National Parks and Wildlife Service (NPWS) and the Central Statistics Office (CSO). The Development Management process in Dublin City Council will provide passive monitoring of various indicators and targets as applications come in. In the case where significant adverse effects, including positive, cumulative or indirect impacts have the potential to occur, i.e. impact on ecological networks for example, as a result of undertaking of individual projects, such instances should be identified and recorded and should feed into the monitoring process. Monitoring will focus on aspects of the environment that are likely to be significantly impacted on by the LAP. Where possible indicators have been chosen based on the availability of the necessary information and the degree to which data will allow the target to be linked directly to the implementation of the plan.

4.4 Monitoring

For the purposes of the Strategic Environmental Assessment (SEA) of the Park West – Cherry Orchard LAP, the SEA in-house team developed environmental protection indicators (EPOs), targets and indicators early on in the SEA process; see Section 4 of the Environmental Report.

Monitoring of the indicators is essential in order to track the impacts of the proposed development on the environmental. A monitoring programme setting out the environmental protection

objectives, targets, indicators, frequency of reporting and department responsibility is included in the Environmental Report (see Table 22 of the Environmental Report: Monitoring Programme).

4.5 Responsibility

Dublin City Council will be responsible for gathering the monitored data, the preparation of the interim report and the implementation of corrective actions, if necessary.

4.6 Thresholds at which Corrective Action will be taken

- The occurrence of flood events
- Court cases taken by the Department of Culture, Heritage and the Gaeltacht regarding impacts upon archaeological heritage including entries to the Record of Monuments and Places;
- Complaints received from statutory consultees regarding avoidable impacts resulting from development which is granted permission under the LAP, and
- Boil notices on drinking water.

4.7 Conclusion

The Strategic Environmental Assessment carried out during the preparation of the LAP has ensured that any potential significant environmental impacts of the Plan have been identified and that they may have been given appropriate consideration. Consultation on the proposed plan and environmental report has further contributed to the development and finalisation of the adopted Local Area Plan. The SEA statement is not the final stage of the process as the plan will be monitored over its lifetime and reported on at regular intervals to assess its impact on the environment.

Appendix 1: Monitoring Programme (See also Table 22 of the Environmental Report)

Table 22: Monitoring Programme / Environmental Protection Objectives, Targets & Indicators					
Environmental Receptor	Environmental Protection Objective	Target	Indicator	Frequency Reporting	of Department Responsible
Population and Human Health	<i>PHH To create a sustainable compact city in which to live, work and/or visit.</i>	Sustainable densities achieved in new residential/ mixed use schemes.	Average density of new residential development for LAP area.	Mid-LAP	Planning and Property, Development Department
		Increase in the number of residential properties.	Number of residential units commenced on site/ completed within LAP.	Mid-LAP	Planning and Property, Development Department
		Increased population within the LAP area.	Percentage increase in population based on CSO.	Mid-LAP based on planned 2021 census results	Planning and Property, Development Department
Biodiversity, Flora & Fauna	<i>BFF To protect and where appropriate enhance the diversity and range of habitats, species and their resources within the LAP area.</i>	No losses of relevant habitats species or their sustaining resources as a result of implementing the LAP.	Survey and monitor bird population.	Mid-LAP	Parks & Landscape Services
			Survey and monitor distribution of bat populations.	Mid-LAP	Parks & Landscape Services
			Evidence of recorded Protected Species.	Mid-LAP	Parks & Landscape Services
			Survey and monitor extent and distribution of invasive species.	Mid-LAP	Parks & Landscape Services
		All streets to be tree-lined.	No. of new trees planted in the LAP area.	Mid-LAP	Parks & Landscape Services
		New local parks provided or Upgrade of existing parks	No. of new parks provided / upgrade to Cherry Orchard Park and other local parks	Mid-LAP	Parks & Landscape Services

Environmental Receptor	Environmental Protection Objective	Target	Indicator	Frequency of Reporting	Department Responsible
Air Quality and Noise	AN1 To protect good air quality status and minimise all forms of air pollution (i.e. Nitrogen oxides & Particulate Matter).	Maintain air quality status and meet value targets for named pollutants in line with Air Quality Framework Directives.	Values of monitored pollutants in the air, including the levels of Nitrogen Oxides (NO _x) and Particulate matter (PM ₁₀) not in breach of regulation limits.	Mid-LAP	Roads & Traffic – Noise & Air Section
		An increase in the population travelling to work or school by public transport or non-mechanical means.	% of population within the plan area travelling to work or school by public transport or non-mechanical means.	Mid LAP - To be based on 2021 Census results	Roads & Traffic Planning and Property, Development Department
	AN2 To maintain and, where possible, improve the good acoustical quality for the current and future residents of the plan area.	Minimise noise pollution.	% of residents exposed to noise levels above undesirable levels.	Mid-LAP	Roads & Traffic – Noise & Air Section
Climate Factors	CF To minimise emissions of greenhouse gases.	Decrease greenhouse gas emissions in line with national targets.	Average energy consumption of new residential housing stock Tonnes of CO ₂ /Capita/Year.	Mid-LAP	Environment and Engineering Department in association with Codema

Environmental Receptor	Environmental Protection Objective	Target	Indicator	Frequency of Reporting	Department Responsible
Water (including flooding)	W1 To comply with EU Water Framework Directive to ensure and maintain good ecological status of all receiving water in the LAP area.	All water bodies to meet targets set in River Basin Management Plan for Ireland 2018-2021'	Ecological status of water bodies.	Mid-LAP	Environment and Engineering Department – Water Division
	W2 To reduce and manage the risk of flooding.	Compliance with the OPW's Guidelines for Planning Authorities – The Planning System and Flood Risk Management.	Percentage of planning applications incorporating flood risk assessment and conditions requiring appropriate flood resilient measures for new developments.	Mid-LAP	Environment and Engineering Department (Planning and Property, Development Department)
		Provide Sustainable Urban Drainage Systems in all new developments.	Number of Sustainable Urban Drainage Systems implemented in new planning applications, and in public areas.	Mid-LAP	Environment and Engineering Department (Planning and Property, Development Department)
	W3 To provide adequate wastewater treatment, water distribution networks and drainage networks	Provision of adequate water, wastewater treatment and drainage infrastructure.	Capacity of water supply and wastewater infrastructure versus demand.	Mid-LAP	Environment & Engineering – Water Division (in association with Irish Water)

Environmental Receptor	Environmental Protection Objective	Target	Indicator	Frequency of Reporting	Department Responsible
Material Assets (transport and waste management)	MA1 To reduce traffic levels by encouraging modal change from car to more sustainable modes of transport such as public transport, walking & cycling.	Extension and improvement of the cycling and walking network in the area.	Length of new cycling paths/lanes and walking routes developed and permeability linkages created.	Mid-LAP	Roads & Traffic Department
		Bus Connects to serve the area.	Bus Connects operational.	Mid-LAP	Roads & Traffic Department
		DART services available in area.	DART expansion programme operational	Mid-LAP	Roads & Traffic Department
	MA2 To reduce the generation of waste and adopt a sustainable approach to waste management.	Increased recycling.	% of waste recycled.	Mid-LAP	Environment & Engineering – Waste Division

Environmental Receptor	Environmental Protection Objective	Target	Indicator	Frequency of Reporting	Department Responsible
Cultural Heritage	CH To protect and conserve the cultural heritage including the built environment and settings; archaeological (recorded monuments, architectural structures, materials and urban fabric) and manmade landscape features.	Ensure that the cultural heritage of the LAP area is maintained and protected from damage or deterioration	No. of archaeological sites investigated/ number of planning applications with input from or screened by the City Archaeologist.	Mid-LAP	Planning and Property, Development Department
			Monitor the City Council's additions to the Record of Protected Structures for the National Inventory of Architectural Heritage NIAH recommendations for Cherry Orchard Hospital and the Dublin City Industrial Heritage Record (DCIHR) recommendations for Industrial Heritage.		
Landscape (including soil)	LS To protect and where appropriate enhance the character, diversity and special qualities of Park West – Cherry Orchard's landscapes and soils.	Develop brownfield lands and vacant sites	Total area of brownfield lands and vacant sites developed/ granted planning permission.	Mid-LAP	Planning and Property, Development Department
		Develop new areas of open space	Number of new parks/ open spaces, green link through the LAP lands.	Mid-LAP	Parks & Landscape Services (Planning and Property, Development Department)

