



Draft Old Connaught Local Area Plan (LAP) 2025

The Eastern and Midland Regional Assembly notes the publication of the Draft Old Connaught Local Area Plan (LAP) 2025 and sets out hereunder recommendations and observations on behalf of the Assembly. This submission has been prepared by the executive and approved by the members of the Eastern and Midland Regional Assembly at its meeting of 11th of April 2025.

1.0 Legislative Context

The role and function of the Regional Assembly, including the scope of the Regional Spatial and Economic Strategy (RSES), is currently provided for in the Planning and Development Act 2000, as amended. It should be noted that this legislation has been superseded by the Planning and Development Act 2024, which was signed into law on 17th October 2024. However, the provisions of the Planning and Development Act 2024 relevant to the Regional Assemblies have not commenced to date, and they will commence on a staged basis in the coming months. Until then, the provisions of the Planning and Development Act 2000, as amended, remain in force.

Section 19 of the Planning and Development Act 2000, as amended, requires that a local area plan shall be consistent with any regional spatial and economic strategy that applies to the area of the plan. While the Regional Assembly is not required under Section 27 of the Planning and Development Act 2000, as amended, to prepare a submission and observations on a local area plan prepared by a local authority as is the case for a development plan, or variation thereof, the Regional Assembly considers that regionally important and strategic plans should be commented upon by the Assembly, and in this case the preparation of a draft local area plan with close connections to a designated Key Town (Bray) in the Region is considered as such. In this regard the Assembly makes this submission and the comments hereunder to be taken into consideration by the local authority in the preparation of the Draft Old Connaught LAP 2025.

2.0 Regional Spatial and Economic Strategy (RSES)

The RSES for the Eastern and Midland Region, which was made by the Members of the Assembly on 28th June 2019, is a strategic plan and investment framework to shape future growth throughout the Region. It identifies regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives (RPOs).

A primary statutory objective of the RSES is to support the implementation of the National Planning Framework (NPF), alignment with the investment priorities of the National Development Plan 2021-2030 (and thus Project Ireland 2040), by coupling new development with the requisite investment in

services and infrastructure. The RSES is of critical importance for the delivery of Project Ireland 2040, given that it is the succeeding tier of policy delivery in Ireland.

The overall vision of the Strategy is to create a sustainable and competitive Region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunity for all. The vision is supported by sixteen Regional Strategic Outcomes (RSOs) that are framed around three key principles of Healthy Placemaking, Climate Action and Economic Opportunity.

The Growth Strategy of the RSES identifies the Old Connaught lands as a strategic development area that forms part of the westward expansion of Bray, a designated Key Town as set out in Table 4.2 Settlement Hierarchy of the RSES and located inside the Dublin Metropolitan Area. The role of Key Towns within the RSES is to serve as large economically active service and/or county towns that provide employment for their surrounding areas and with high-quality transport links and the capacity to act as growth drivers to complement the Regional Growth Centres. The RSES also identifies Bray as a key node on the North-South (DART) Corridor.

3.0 Submission

At the outset, the Assembly would like to acknowledge the extensive work that Dún Laoghaire-Rathdown County Council has carried out in order to prepare the draft LAP and, in particular, the overall approach and effort of the local authority to coordinate and incorporate policies and objectives so that they are consistent with the RSES.

The Draft LAP outlines the strategic policy framework that highlights how the plan will be informed by a hierarchy of planning guidance, including the National Planning Framework (NPF), the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region and the Dún Laoghaire-Rathdown County Development Plan 2022-2028. The structure and content of the Draft LAP comprises the following headings:

1. Introduction and Local Area Context
2. Strategic Planning Framework
3. Climate Action
4. Spatial Strategy and Site Development Frameworks
5. Sustainable Urban Village
6. Transport and Movement
7. Green Infrastructure and Biodiversity
8. Open Space, Parks and Recreation
9. Heritage and Conservation
10. Infrastructure, Utilities and Flood Risk

11. Phasing and Implementation
12. Monitoring and Evaluation

The Assembly considers that these areas of focus satisfactorily align with the three key principles of the RSES (Healthy Placemaking, Climate Action and Economic Opportunity) and the sixteen Regional Strategic Outcomes (RSOs), which are outlined in Section 2.3 of the RSES.

3.1 Introduction and Local Area Context

Chapter 1 of the Draft LAP outlines the context of the local area under consideration. Compared to the plan area set out in the Dún Laoghaire-Rathdown County Development Plan 2022-2028, the indicative boundary of the Draft Plan area has been extended to the north. The character of the draft area of the LAP is distinctly rural in form with a landscape characterised by the transition zone between the uplands to the west and the lowlands to the east. The Draft LAP indicates that the estimated population within the area of the LAP based on the 2022 Census data is c. 454 people. However, the Core Strategy of the Dún Laoghaire-Rathdown County Development Plan 2022-2028 provides for significant residential growth at Old Connaught which could increase the population to c. 6,000-6,500 people (Table 1.3 and Figure 2.6 of the Draft LAP). Chapter 11 of the Draft LAP identifies how this can be provided on a phased and coordinated basis in the plan's phasing strategy. A SWOC analysis was undertaken as part of the Draft LAP and the Assembly welcomes the identification of the 'strength' of Old Connaught as a 'strategic location adjacent to the RSES 'Key Town' of Bray and identified for residential development in the Dublin Metropolitan Area Strategic Plan (MASP). The Assembly further welcomes the extensive reference to the Luas Green Line extension within the Draft LAP. Notwithstanding, the Assembly notes that the degree to which the land in question is unserved is noted as a 'weakness' in the Draft LAP, as well as the 'challenges' of ensuring the delivery of sustainable transport and neighbourhood infrastructure in tandem with the delivery of housing (see also Section 3.5 below).

The Draft LAP is also informed by a number of studies and appendices, including:

- Infrastructure Capacity Assessment Study
- Area Based Transport Assessment
- Community Infrastructure Audit
- Strategic Environmental Assessment
- Habitats Directive Assessment
- Strategic Flood Risk Assessment

The Assembly considers the overall plan preparation to be comprehensive, with the structure and content being in accordance with Local Area Plan Guidelines for Planning Authorities 2013 and the Development Plans Guidelines for Planning Authorities 2022 (where relevant).

3.2 Strategic Planning Framework

Chapter 2 of the Draft LAP states that the primary focus of the plan is to progress the development of a sustainable residential community at Old Connaught while acknowledging that the majority of policies, objectives and development standards that will apply in the Old Connaught LAP area are already determined in the Dún Laoghaire-Rathdown County Development Plan 2022-2028. In this regard, the Draft LAP has been framed in accordance with the contents of the Dún Laoghaire-Rathdown County Development Plan 2022-2028, particularly in relation to residential development objectives and Core Strategy population and housing targets.

The Regional Assembly welcomes the references to the location of the Draft LAP within the Dublin MASP area and Old Connaught's relationship with the development of Bray. Chapter 3 of the RSES, Growth Strategy, outlines growth enablers for settlements in the Metropolitan Area, including Bray, Enniskerry and Kilmacanogue, and these include:

- To realise ambitious compact growth targets of at least 30% of all new homes to be built, to be within or contiguous to the existing built-up area of metropolitan settlements, with a focus on healthy placemaking and improved quality of life;
- Delivery of strategic development areas identified in the MASP, located at key nodes along high-quality public transport corridors in tandem with the delivery of infrastructure and enabling services to ensure a steady supply of serviced sites and to support accelerated delivery of housing.
- To increase employment in strategic locations, providing for people intensive employment at other sustainable locations near high quality public transport nodes, building on commercial and research synergies in proximity to large employers, industry clusters and smart specialisation and activating strategic sites to strengthen the local employment base in commuter towns.
- Enhance co-ordination across local authorities and relevant agencies to promote more active land management and achieve compact growth targets through the development of infill, brownfield and public lands, with a focus on social as well as physical regeneration and improved sustainability.

Furthermore, the Settlement Strategy contained in Chapter 4 of the RSES identifies Bray as a Metropolitan Key Town in the settlement hierarchy of the Region. In this respect the RSES characterises Bray as a strong active town that provides higher order services, including tertiary education, health, cultural and leisure facilities, is a major retail and shopping destination, and attracts people from the surrounding towns and villages.

The RSES recognises that population growth in Bray has been modest compared to other settlements as expansion of the town is constrained by the coast to the east, Bray Head/Sugarloaf mountain to the south and the N/M11 to the west.

The Assembly therefore welcomes recognition within the Draft LAP of Old Connaught's role as part of the westward expansion of Bray, its location within the North-South Corridor (DART) making Old Connaught part of the strategic development corridor of the MASP.

3.3 Climate Action

The Draft LAP document includes Policy OCLAP1 Low Carbon and Climate Resilient Community which states that 'It is Policy to progress the development of Old Connaught as a low carbon and climate resilient community'. The Draft LAP seeks to progress this goal by providing a strategy for the integrated management of land, water, and living resources that promotes conservation and sustainable use in an equitable way. This is welcomed by the Regional Assembly as it is aligned with the key principle of Climate Action, which is one of the three key principles of the RSES, supported by RSOs 6-11 in relation to climate action and RPOs for biodiversity and natural heritage, enhanced green infrastructure, supporting the transition to low carbon and clean energy, building climate resilience, sustainable management of water, waste and other environmental resources, and integrated transport and land use.

3.4 Spatial Strategy and Site Development Framework/Sustainable Urban Village

Section 4.2 of the Draft LAP sets out the overarching vision for Old Connaught to support the growth of the area as a sustainable urban village with a strong sense of place and integrating both the existing and planned new communities underpinned by the following strategic objectives:

- Sustainable Urban Village
- Character and Heritage
- Sustainable Transport and Movement
- Sustainable Neighborhoods and Quality Housing
- Healthy Placemaking and Liveability
- Climate and Ecosystems

The Assembly welcomes the reference above to 'Healthy Placemaking' as one of the three key principles underpinning the RSES and draws attention to RPOs 9.10 to 9.13 in this regard.

The Draft LAP presents a plan-led approach to development and Objective SDF1 states that future development should accord with the land uses identified within the Draft LAP. As per the Dún Laoghaire-Rathdown County Development Plan 2022-2028, there are c. 50 hectares of undeveloped

‘A1’ zoned land at Old Connaught which can accommodate a wide range of land uses in addition to residential to facilitate the development of a sustainable urban village.

Chapter 5 of the Draft LAP sets out policies and objectives aimed at realising the concept of a sustainable urban village. i.e. that people should be able to sustainably access most of their living requirements within easy reach such as the provision of primary schools, childcare, local shops and community and recreational facilities. The Draft LAP highlights the needs of the existing and future population to cater for in terms of sustainable neighbourhood Infrastructure consistent with the 10-Minute Neighbourhood Concept.

The Assembly welcomes the goal of creating a sustainable urban village and would draw attention to the Guiding Principles for the creation of healthy and attractive places as set out at section 9.4 of the RSES.

In terms of employment, RPO 4.38 of the RSES supports the development of Bray as a strategic employment location with a particular focus on attracting high value investment in ‘people’ based industries at accessible locations, to increase the number of local jobs. The Assembly welcomes the recognition of Bray as an employment destination and the proposal that through the progression of public transport and active travel infrastructure Old Connaught will sustainably align with a range of employment locations thereby minimising the divergence between the places people live and work.

3.5 Transport and Movement

Chapter 6 of the Draft LAP outlines how the future transport and movement network of Old Connaught is a fundamental component in delivering a sustainable community focused on compact and climate resilient growth. The Assembly considers that the final LAP should consider the sustainability of all elements of the proposed transport network, including vehicular circulation and transport infrastructure, to ensure efficient movement within the LAP area, as well as linkages to the M11 (north and south) and the Key Town of Bray to minimise potential congestion. The Assembly recognises the opportunity of the planned delivery of the extension of the Luas Green Line to Bray. Policy OCLAP27 of the Draft LAP states that ‘It is policy to support the extension of the Luas Green Line southwards in order to serve the Bray and Environs area’. Table 5.1 of the RSES also highlights the Luas extension to Bray as long-term enabling infrastructure. At the same time, it is recognised in the Draft LAP that the Old Connaught area is currently poorly served in terms of meaningful public transport infrastructure and as a strategic development corridor with the MASP area, the westward expansion of Bray to Old Connaught needs to be linked to improved public transport connections.

RPO 5.2 of the RSES is to support the delivery of key sustainable transport projects including Metrolink, DART and Luas expansion programmes, BusConnects and the Greater Dublin Metropolitan Cycle Network to ensure that future development maximises the efficiency and protects the strategic

capacity of the metropolitan area transport network, existing and planned. Furthermore, RPO 5.3 of the RSES states that future development in the Dublin Metropolitan Area shall be planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive street environment for pedestrians and cyclists. Further to this, the Assembly notes that the only transport-linked phasing in the draft LAP relates to the provision of road access.

The Draft LAP refers widely to the Luas Green Line extension, which is welcomed by the Regional Assembly. Notwithstanding, a number of these references refer to it as a "potential" rather than "planned" or "proposed" development. In this context, it should be noted that the Luas Green Line extension is referred to in the Greater Dublin Area Transport Strategy 2022-2042 Figure 19.1 for medium-term delivery (i.e. 2031 to 2036). Furthermore, given the emphasis in the First Revision to the NPF on Transport-Orientated Development, and in the RSES on strategic development areas and corridors, and reference in the RSES to the delivery of the Luas Green Line Extension as enabling infrastructure for urban development in this area, the Regional Assembly considers that the term "potential" should not be used to refer to this essential enabling infrastructure. In this context, the Regional Assembly recommends that the LAP recognises that the Luas extension is essential to the successful implementation of the LAP and that the Luas extension is included in the phasing plan in the LAP, with the delivery of the Luas within the 2031-2036 timeframe so that new residents can benefit from multiple positive individual and societal benefits. The Assembly further recognises that rapid delivery of the Luas Green Line extension - as a vital high quality public transport infrastructure - would bestow significant benefits including the potential to reduce the cost of housing (by reducing the number of car parking spaces needed) and the potential to improve the ability of households to afford housing (by reducing the number of cars per household).

RPO 5.1 of the RSES is to support continued collaboration between infrastructure providers, state agencies and local authorities in the metropolitan area to inform cross sectoral investment plans and capital spending plans to accelerate the development of strategic development areas and secure the best use of public lands in the Dublin Metropolitan Area. Aligned with this, Policy OCLAP28 of the Draft LAP states that 'It is Policy to continue to co-ordinate and co-operate, as appropriate, with Wicklow County Council and the relevant transport agencies to facilitate the delivery of key enabling transport infrastructure and services to support the sustainable development of Old Connaught'. The Regional Assembly welcomes this objective which is supportive of a coordinated planning approach.

The Regional Assembly welcomes the strategic objective of the Draft Plan to manage existing and future transport demand in a sustainable manner and reference in paragraph 6.3.2 of the Draft LAP to the National Sustainable Mobility Policy (2022) and the accompanying Action Plan. This approach is supportive of RPO 4.41 of the RSES which encourages the plan area's transition towards sustainable and low carbon transport modes through the promotion of alternative modes of transport and

‘walkable communities’ whereby a range of facilities and services will be accessible within short walking or cycling distance. Furthermore, the Assembly welcomes the emphasis in the Draft LAP on filtered permeability and active travel. Notwithstanding, the Regional Assembly notes that integration of walking and cycling links, especially to public transport, schools and other local amenities, should be considered for inclusion in the phasing plan provided for in the LAP. The preparation of an Area Based Transport Assessment to support the transport strategy of the Draft LAP also aligns with RPO 8.6 of the RSES which is in relation to the preparation of Local Transport Plans for selected settlements in the Region. The Regional Assembly considers that this document should be published separately and alongside the Draft LAP.

To enhance knowledge and expertise in this area, the Regional Assembly encourages continued engagement by Dún Laoghaire-Rathdown County Council with the Pathfinder 27 Project, the Smart and Sustainable Mobility Accelerator Programme (SSMA), which is being delivered by the Regional Assembly for the Eastern and Midland Region. The programme aims to support local authorities and stakeholders in the Region to design and implement smart and sustainable mobility projects under the National Sustainable Mobility Policy (SMP) Action Plan 2022-2025. Dún Laoghaire-Rathdown County Council is welcome to consult with the Regional Assembly in relation to the SSMA Programme.

3.6 Green Infrastructure and Biodiversity

Chapter 7 of the Draft LAP acknowledges that though it has been managed over time, the majority of the plan area remains predominantly rural in character. The landscape of Old Connaught is representative of the wider Dún Laoghaire-Rathdown area which is framed by its coastal and upland landscapes, and where landscape features are integral to the daily experiences of residents. Old Connaught lands represent a transition zone between the upland and the lowland with the Draft LAP lands primarily located in the Ballyman Landscape Character Area.

In terms of biodiversity and natural heritage, the Ballyman Glen Special Area of Conservation (SAC) and proposed Natural Heritage Area (pNHA) is the most important area of biodiversity in the Plan area. The Qualifying Interest habitats of the Ballyman Glen SAC are both dependent on the maintenance of hydrological conditions which are susceptible to disturbance by development. The Assembly therefore welcomes Policy OCLAP38 – Ballyman Glen SAC/pNHA and policy in relation to Groundwater Dependent Terrestrial Ecosystems which seek to protect these designated areas.

The Draft LAP sets out how the Dún Laoghaire-Rathdown County Development Plan approach is integrated into the Draft LAP ensuring that development, where practicable and possible, protects existing green infrastructure and furthermore, encourages and facilitates, the creation, management, restoration and enhancement of our natural and semi-natural areas. The Assembly welcomes the inclusion of Policy OCLAP36 and the mapping of existing green infrastructure as indicated in Figure 7.1 of the Draft LAP. However, it is considered that the green infrastructure policy objectives could be further strengthened by the inclusion of guidance on how Green and Blue Infrastructure features can be integrated into the new proposals and by making reference to the ‘Guiding Principles in the preparation of Green Infrastructure Strategies’ in Section 7.7 of the RSES which mentions the need to

identify and protect existing Green Infrastructure assets; the importance of connectivity; consideration of the ecological impacts of greenways; integrating an ecosystem services approach; carbon sequestration and integration with the natural and built environment.

Furthermore, through participation on the Interreg Europe PROGRESS project, the Assembly has developed a range of resources to support the implementation of objectives for ecosystem services and green infrastructure which may be of assistance to the local authority in balancing environmental sensitivity with development. These include a green infrastructure and ecosystem services mapping methodology, policy briefs which include 'how to' recommendations, good practice handbooks, and infographics.

As part of the PROGRESS project, in cooperation with Dún Laoghaire-Rathdown County Council and the Ecological Research and Forestry Applications Centre, Barcelona, Spain, the Assembly secured Interreg Europe funding to test a Green Infrastructure Decision Support Mapping Approach for Ecosystem Services. This involved developing and testing a mapping methodology to contribute to enhanced decision-making for Green Infrastructure by scoring and mapping ecosystem services for the Dún Laoghaire-Rathdown County Council administrative area. A methodology was developed with the Dún Laoghaire-Rathdown Biodiversity Officer and criteria were established to test the transfer of the SITxell conceptual model and methodology. A range of ecosystem services were mapped based on three contrasting perspectives: 1) Intrinsic value, 2) Functional value, and 3) Leisure/Cultural value. The Pilot Action also tested whether these three dimensions might be combined in order to identify the areas maximising the sum and the diversity of values.

The Mapping Approach was evaluated by target users at dedicated workshops in January 2022 and it was determined that the methodology and mapping approach was both effective and appropriate to contribute to the development of a coordinated approach for Green Infrastructure and Ecosystem Services Mapping in Dún Laoghaire-Rathdown and the Dublin Metropolitan Area more broadly. The technical report outlining the methodology of the mapping approach was published in June 2022. The Regional Assembly directs the local authority to the findings of this approach and that these can be incorporated into the Draft LAP, where relevant, for the implementation of the green infrastructure and biodiversity policies of the Draft LAP.

3.7 Open Space, Parks and Recreation

Chapter 8 of the Draft LAP outlines a plan-led approach to the provision of a network of nine strategic parks and open spaces to support the sustainable development of Old Connaught. These parks and open spaces are identified in the Draft LAP to be linked where possible by active travel routes. The Assembly welcomes this approach which is consistent with the guiding principles of healthy placemaking and supports RPOs 9.14-9.17 of the RSES.

3.8 Heritage and Conservation

Despite the size and rural character of Old Connaught, the area of the Draft LAP is rich in heritage, which contributes positively to its identity and unique sense of place. The Draft LAP highlights thirteen

protected structures in Appendix 5 of the Draft LAP, dating mainly from the 19th Century, with the Victorian Walled Gardens and Jubilee Hall of particular importance.

It is noted that Section 9.27 of the RSES identifies the importance of cultural, architectural, and archaeological heritage within the Region, particular in contributing to a town's identity, and the repair and reuse of historic buildings is identified as an integral part of sustainable development. Policies OCLAP47 and OCLAP48, of the Draft LAP are consistent with this approach and support the protection, conservation and encouragement of use of Protected Structures, which is welcomed by the Regional Assembly.

Given this rich cultural heritage, the Assembly welcomes recognition in the Draft LAP of the importance of the managing the integration of the new development and the inclusion of policies OCLAP50, OCLAP51, and OCLAP52. Furthermore, Objectives HC1 and HC2 of the Draft LAP align with RPO 9.30 of the RSES which is concerned with supporting the sensitive reuse of Protected Structures.

3.9 Infrastructure, Utilities and Flood Risk

Section 10 of the Draft LAP relates to infrastructure, utilities and flood risk and outlines that an Infrastructure Capacity Assessment Study was undertaken to inform the appropriate zoning of land to facilitate plan-led development.

Following completed works in 2024 on the Old Connaught/Woodbrook Water Supply Scheme which comprised the upgrade of the drinking water supply for parts of South County Dublin and North Wicklow, according to the Draft LAP, it is not anticipated that any additional significant water infrastructure will be required to enable development in the area.

At the same time, it is recognised in the Draft LAP that the Old Connaught area is not currently served with strategic wastewater infrastructure meaning that many existing residents own and maintain their own septic tanks. The Assembly therefore welcomes Policy OCLAP56 – Wastewater Treatment to ensure discharge after treatment of wastewater.

Notwithstanding, the Assembly considers that any required wastewater upgrades for the Old Connaught area be undertaken in support of RPO 10.3 of the RSES in relation to co-operating with Uisce Éireann in the delivery of their investments work programme to increase capacity to service settlements in accordance with the settlement strategy of the RSES and local authority core strategies.

Section 10.4 of the Draft LAP discusses surface water drainage and ground water with the promotion of SUDS in new development proposals as set out in the planning and development objectives, and this is welcomed by the Assembly. Notwithstanding, it is considered that this aspect of the Draft LAP could be further strengthened by making reference to the guiding principles for Sustainable Drainage

Systems as set out in Section 10.2 of the RSES. In addition, the local authority should note the recent publication of *'Nature Based Management of Urban Rainwater and Urban Surface Water Discharges – A National Strategy'* by the Department of Housing, Local Government and Heritage in May 2024 which is of relevance to the above.

Strategic Flood Risk Assessment (SFRA) has been undertaken, which aligns with RPO 7.12 of the RSES, alongside the preparation of the Draft LAP, the SEA and the NIR. It is further noted that the recommendations from the SFRA have been integrated into the Draft LAP which is welcomed by the Regional Assembly. In keeping with best practice, it is recommended that the Local Authority takes opportunities to enhance biodiversity and amenities, including where flood risk management measures are planned, in line with RPOs 7.14 and 7.15 of the RSES.

3.10 Phasing and Implementation

Chapter 11 of the Draft LAP provides commentary on how the strategic vision, contents and objectives for Old Connaught over the plan and beyond will be realised. In this respect, under Section 11.3, the Draft LAP outlines an 'Old Connaught LAP Phasing Strategy'. The Strategy outlines three distinct phases:

- Phase A – Sequentially preferable first phase, Zoned A1, potential to deliver c.850 -1000 new homes.
- Phase B -- Sequentially preferable second phase, Zoned A2, potential to deliver c. 1300 – 1400 new homes.
- Phase C – Sequentially preferable third phase, Zoned GB, potential to deliver c. 1050 new homes.

Within Phase A, there has been a further delineation between sub-phase 1 and sub-phase 2. In order to enable sub-phase 2, planning permission is required for the 'progression of a new road and bridge over the N11 to the Dublin Road (including link connections) or the N11/M11 Junction 4 to Junction 14 Improvement Scheme' along with a range of other requirements ranging from Active Travel measures to Wastewater Infrastructure Development.

The Draft LAP notes that the purpose of this subcategory is to provide a level of clarity as to the future development of the Draft LAP area as well as to safeguard these lands to ensure the orderly and sequential development of the area in the period beyond the lifetime of the Draft LAP as per the provisions of the Development Plans Guidelines for Planning Authorities (2022).

As a key part of the enabling infrastructure in the area, the new road and bridge over the N11 to the Dublin Road is required to have commenced construction prior to the granting of planning permission for development within Phase B and Phase C.

Tables 11.1, 11.2, and 11.3 within Chapter 11 provide a detailed breakdown on implementation and infrastructure requirements needed for each phase of development.

Overall, the Assembly welcomes the detail that has been provided by the local authority in Chapter 11 of the Draft LAP in relation to the implementation strategy for strategic and key development areas in Old Connaught along with expected timeframes for the provision of supporting infrastructure to service same. It is considered that the inclusion of this section provides greater clarity on the short-, medium- and long-term development strategy for the entire plan area and aligns with RPO 4.37 of the RSES which supports the westward expansion of Bray Town supported by the delivery of public transport links and road improvements. However, as outlined in Section 3.5 above, the Regional Assembly recommends that the LAP recognises that the Luas extension is essential to the successful implementation of the LAP and that the Luas extension is included in the phasing plan in the LAP, with the delivery of the Luas within the 2031-2036 timeframe so that new residents can benefit from multiple positive individual and societal benefits. Furthermore, the Regional Assembly recommends that the integration of walking and cycling links, especially to public transport, schools and other local amenities, should be considered for inclusion in the phasing plan provided for in the LAP.

3.11 Monitoring and Evaluation

The Assembly welcomes the inclusion of detail in relation to monitoring, and the attention of the local authority is directed to the Regional Development Monitor (RDM), which is aligned to National and Regional Strategic Outcomes in the NPF and RSES, which may provide additional support in relation to monitoring.

3.12 SEA and AA

The Assembly welcomes the preparation of the Draft LAP in tandem with the required environmental processes, namely Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA)

The SEA Environmental Report sets out an assessment of the environmental effects in combination with the wider planning framework arising from the Draft LAP to provide a clear understanding of the likely environmental consequences of decisions arising from the LAP. Regarding mitigation, the Draft LAP states that by integrating all related recommendations into the Draft LAP, the local authority has ensured that both the beneficial environmental effects of implementing the LAP have been and will be maximised and that potential adverse effects have been and will be avoided, reduced or offset.

The Draft LAP is subject to Appropriate Assessment (AA) and a Natura Impact Report (NIR) has been prepared which states that having incorporated mitigation measures into the Draft LAP, it has been demonstrated that the Draft LAP is not foreseen to give rise to any significant adverse effects to designated European sites, alone or in combination with other plans or projects. This determination has been made in view of the conservation objectives of the habitats and/or species, for which these

sites have been designated. The Natura Impact Report will, alongside any other inputs from the Plan-preparation/AA process, inform the competent authority when it undertakes the final Appropriate Assessment determination at adoption of the LAP. The AA process is ongoing and will inform and be concluded at adoption of the LAP.

4.0 Recommendations

The Regional Assembly would like to acknowledge the extensive work that Dún Laoghaire-Rathdown County Council has carried out in order to prepare the Draft Old Connaught Local Area Plan 2025 and, in particular, the overall approach and effort of the Council to coordinate and incorporate policies and objectives so that they are consistent with the RSES is welcomed.

The Regional Assembly advises that Dún Laoghaire–Rathdown County Council pays particular attention to the following issues in the finalisation of the Old Connaught Local Area Plan 2025 in order to ensure consistency with the RSES, and makes the following recommendations:

1. The Assembly considers that Section 4 of the Draft LAP should make reference to Healthy Placemaking RPOs 9.10, 9.12 and 9.13, and Figure 9.2 Healthy Placemaking Strategy of the RSES.
Reason: In the interest of demonstrating consistency with the RSES.
2. The Assembly considers that Chapter 5, Section 5.2 of the Draft LAP could be strengthened by making reference to the Healthy Placemaking Strategy (Figure 9.2) of the RSES to underpin the ambitions of the Draft Plan on integrated land use and transportation in the creation of healthy and attractive places.
Reason: In the interest of demonstrating consistency with the RSES.
3. The Assembly considers that Chapter 6 of the LAP could be strengthened by considering the sustainability and efficiency of all elements of the proposed transport network, including vehicular circulation and transport infrastructure, and recognising that the Luas Green Line extension, as referred to in Figure 5.4 of the RSES, is essential to the successful implementation of the LAP and that the Luas Green Line extension is included in the phasing plan in the LAP.
Reason: In the interest of demonstrating consistency with the RSES and to ensure efficient movement within the LAP area, as well as linkages to the M11 (north and south), the Key Town of Bray and the Dublin Metropolitan Area.

4. The Assembly considers that best practice should be applied in order to mitigate and reduce the effects of climate change, and in this respect the Assembly would like to draw attention to Figure 7.4 Climate Strategy of the RSES which should be referred to in the Draft LAP.
Reason: In the interest of best practice and in demonstrating consistency with the RSES.
5. The Draft LAP should make reference to RPOs 7.14 and 7.15 of the RSES regarding flood risk management, and should make reference to the guiding principles for Sustainable Drainage Systems as set out in Section 10.2 of the RSES.
Reason: In the interest of demonstrating consistency with the RSES.
6. The Assembly considers that Chapter 8 of the Draft LAP could be further strengthened by making reference to the 'Guiding Principles in the preparation of Green Infrastructure Strategies' in Section 7.7 of the RSES.
Reason: In the interest of demonstrating consistency with the RSES.

The following are observations by the Regional Assembly that should be taken into consideration in the finalisation of the Draft Old Connaught Local Area Plan in the interest of best practice:

1. The Assembly considers that in the implementation of the LAP, Dún Laoghaire-Rathdown County Council should work to ensure that sustainable transport and neighbourhood infrastructure are delivered in tandem with the delivery of housing.
Reason: In the interest of best practice.
2. The Assembly considers that the integration of walking and cycling links, especially to public transport, schools and other local amenities, should be considered for inclusion in the phasing plan provided for in the LAP.
Reason: In the interest of best practice.
3. The Assembly considers that the Old Connaught Area Based Transport Assessment (OCABTA) which has informed the preparation of the Draft LAP should be published as a separate document and included as part of the appendices of the LAP.
Reason: In the interest of best practice.
4. The Assembly would like to draw the attention of the local authority to the recent publication of *'Nature Based Management of Urban Rainwater and Urban Surface Water Discharges – A National Strategy'* by the Department of Housing, Local Government and Heritage in May 2024.
Reason: In the interest of best practice.

5. The Assembly would like to direct the local authority to their involvement in, and the findings of, the PROGRESS report and that this methodology approach should be incorporated into the implementation of green infrastructure and biodiversity policies in the Draft LAP.

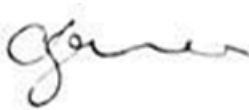
Reason: In the interest of best practice.

5.0 Conclusion

It is considered that the Draft Old Connaught LAP is generally consistent with the Regional Spatial and Economic Strategy (RSES) 2019-2031 and would be further enhanced by addressing the recommendations set out above.

It should be noted that the officials of the Eastern and Midland Regional Assembly are available to discuss the matters raised and the Assembly welcomes further opportunities to engage in the statutory process of the making of the Old Connaught Local Area Plan 2025.

Regards,



Clare Bannon
A/Director
Eastern and Midland Regional Assembly
11th April 2025