

To the Lord Mayor and  
Members of Dublin City Council

Report No. 199/2017 of the  
Assistant Chief Executive



Comhairle Cathrach  
Bhaile Átha Cliath  
Dublin City Council

---

**DRAFT BALLYMUN LOCAL AREA PLAN 2017**  
**CHIEF EXECUTIVE REPORT ON SUBMISSIONS FROM PUBLIC**  
**DISPLAY OF DRAFT PLAN**

---

**RICHARD SHAKESPEARE**  
**ASSISTANT CHIEF EXECUTIVE,**  
**DUBLIN CITY COUNCIL**  
**9<sup>th</sup> June 2017**

<b>1</b>	<b>INTRODUCTION.....</b>	<b>3</b>
1.1	FORMAT OF CHIEF EXECUTIVE’S REPORT .....	3
1.2	CONTEXT .....	3
<b>2</b>	<b>PROCESS TO DATE AND NEXT STEPS .....</b>	<b>4</b>
2.1	PRE-DRAFT CONSULTATION PROCESS (ISSUES PAPER).....	4
2.2	DRAFT BALLYMUN LOCAL AREA PLAN 2017 PUBLIC CONSULTATION PROCESS .....	4
2.3	NEXT STEP: ADOPTION / AMENDMENT OF PLAN .....	5
<b>3</b>	<b>SUBMISSION RECEIVED .....</b>	<b>6</b>
3.1	CHIEF EXECUTIVE’S RESPONSE TO PRESCRIBED BODIES .....	6
3.1.1	<i>Department of Housing, Planning, Community and Local Government (Submission No. 69)</i> 6	
3.1.2	<i>Transport Infrastructure Ireland (TII) (Submission No. 220)</i> .....	10
3.1.3	<i>National Transport Authority (NTA) (Submission No. 171)</i> .....	11
3.1.4	<i>Fingal County Council (Submission No. 92)</i> .....	13
3.1.5	<i>Environmental Protection Agency (Submission no. 96)</i> .....	13
3.1.6	<i>Submission from Department of Education and Skills (Submission no. 68)</i> .....	17
3.2	SUMMARY OF INDIVIDUAL SUBMISSIONS BY TOPIC AND RESPONSE FROM THE CHIEF EXECUTIVE	19
3.2.1	<i>Chapter 1: Introduction and Policy Context</i> .....	19
3.2.2	<i>Chapter 5: LAP Development Strategy</i> .....	19
3.2.2.1	Section 5.2 Land Use strategy .....	19
3.2.2.2	Section 5.3 Economic Development and Employment .....	20
3.2.2.3	Section 5.4 Movement.....	24
3.2.2.4	Section 5.5 Urban Form and Design.....	27
3.2.2.5	Section 5.6 Housing and tenure .....	28
3.2.2.6	Section 5.7 Social and community infrastructure and supports.....	30
3.2.2.7	Section 5.8 Sports, Recreation and Open Space.....	32
3.2.2.8	Section 5.9 Green Infrastructure and Biodiversity .....	42
3.2.2.9	Section 5.10 Drainage & Water.....	42
3.2.3	<i>Chapter 6: Site Briefs</i> .....	43
3.2.3.1	Section 6.2 Main Street Sites.....	43
3.2.3.2	Section 6.3 Neighbourhood sites .....	45
3.2.3.3	Section 6.4 M50 Lands.....	55
3.2.4	<i>Chapter 7: Implementation and phasing</i> .....	57
3.2.4.1	Phasing (Section 7.3).....	57
3.2.5	<i>Additional Notes</i> .....	58
<b>4</b>	<b>OVERALL SUMMARY OF SUBMISSIONS AND RECOMMENDATION.....</b>	<b>59</b>
<b>5</b>	<b>CONCLUSION AND CHIEF EXECUTIVE’S RECOMMENDATION .....</b>	<b>60</b>
<b>6</b>	<b>APPENDIX 1: LIST OF ALL PERSONS OR BODIES THAT MADE SUBMISSIONS/ OBSERVATIONS ON THE DRAFT BALLYMUN LOCAL AREA PLAN.....</b>	<b>61</b>
<b>7</b>	<b>APPENDIX 2: SUMMARY OF THE ISSUES RECEIVED FROM INDIVIDUAL SUBMISSIONS/OBSERVATIONS .....</b>	<b>67</b>

# 1 Introduction

This Chief Executive's Report forms part of the statutory procedure for the preparation of a local area plan as required by Section 20 of the Planning and Development Acts 2000 (as amended). It consists of the Report and Recommendation of the Chief Executive on the submissions or observations received on the Draft Ballymun Local Area Plan 2017.

## 1.1 Format of Chief Executive's Report

This report contains the following: -

1. A list of the persons or bodies that made submissions/observations, set out in Appendix 1.
2. A summary of the issues received from individual submissions/ observations, set out in Appendix 2.
3. A summary of the issues raised by the Prescribed Bodies and the Chief Executive's response and recommendation on these issues.
4. A summary of all other issues raised by topic, and the Chief Executive's response and recommendation thereon.

Minor typographical or graphical errors or discrepancies will be amended in the final local area plan and have not been included in this report. Similarly, where draft plans or policy documents referenced in the document have been up-dated or approved since the preparation of the draft plan, these will be amended accordingly in the final document.

## 1.2 Context

In 1997 a government decision was made to regenerate the area of Ballymun. Dublin City Council (DCC) set up Ballymun Regeneration Limited (BRL) to oversee and implement the regeneration process. The Ballymun Masterplan was produced in 1998 following consultation with the local community, and over the next 17 years BRL implemented the key objectives of this plan which sought to enhance the economic, social, environmental and physical character of Ballymun. With the winding down of Ballymun Regeneration Limited and the transfer of its functions and responsibilities to Dublin City Council it is timely that a new plan for Ballymun is prepared which will build on the successes of the Masterplan and address its future challenges. The preparation of the Local Area Plan will help safeguard the significant investment made in the area to date and ensure the regeneration is brought to a successful conclusion.

The LAP reviews the progress made in implementing the aims and objectives of the Ballymun Masterplan, and provides an updated strategy for the future development and management of the area to meet the needs of the existing and future population.

The preparation of this Local Area Plan is identified as an objective of the Dublin City Development Plan 2016-2022 (Table F). LAP's are a key mechanism to deliver the Core Strategy as set out in the Development Plan and are prioritised for areas subject to large scale development / redevelopment.

There are c. 33.44 hectares of undeveloped land available for mixed use commercial and residential development within the Ballymun LAP area (including the mixed use shopping centre site and the Hampton Wood private development, c. 2.9ha, under construction), and an additional c. 24 ha within the adjoining Ballymun M50 lands (i.e. outside the LAP boundary). This land is all serviced and predominantly under the ownership of Dublin City Council (52.63ha) thus putting Ballymun in a unique position to take advantage of the current economic upturn and become a strong growth centre of the City. As such it is important to set out the future development context both to protect the significant investment made in the area to date and to guide the continued sustainable development of the area.

## 2 Process to Date and Next Steps

The draft LAP has so far been through a number of steps in its preparation, a summary of which is outlined below.

### 2.1 Pre-Draft Consultation Process (Issues Paper)

An important step in making a Local Area Plan is to identify the issues for the local area from the point of view of local residents, business people, land owners, state bodies operating services in the area, and other interested stakeholders. To assist this process, the preparation of the draft local area plan began with initial research undertaken by the Planning and Property Development Department and discussions with the elected Councillors (presentation given to the North West Area Committee (NWAC) on the 16<sup>th</sup> June regarding the items to be included in the Issues Paper).

The Issues Paper (i.e. pre-draft local area plan) was subsequently prepared and put on public display for a four week period from 5<sup>th</sup> November 2015 to 3<sup>rd</sup> December 2015 (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, in the Civic Centre, Ballymun and online at [www.dublincity.ie](http://www.dublincity.ie). In addition, members of the Planning Department were available locally in the area to assist with any queries on the following public consultation dates: -

- Friday 6<sup>th</sup> November: 10am - 1pm
- Thursday 12<sup>th</sup> November: 1pm - 4pm
- Saturday 21<sup>st</sup> November: 10am – 12pm
- Thursday 26<sup>th</sup> November: 7pm - 9pm

A summary of the issues raised during this period were presented to the Council in a report of the Assistant Chief Executive, at the April 2016 Council meeting, Report No. 105/2016. The motion to prepare a Draft LAP for the area was put and carried at this meeting. Following the pre-draft consultation process, the Draft LAP was prepared, taking into account the submissions received; and national; regional and City Council policy.

### 2.2 Draft Ballymun Local Area Plan 2017 Public Consultation Process

The Draft LAP was placed on public display for a period of 6 weeks from Wednesday 5<sup>th</sup> April to Wednesday 17<sup>th</sup> May 2017 (inclusive) during which time submissions and observations were invited. Public displays were erected for viewing at the City Council offices at Wood Quay, in the Civic Centre, Ballymun and online at [www.dublincity.ie](http://www.dublincity.ie).

A series of staffed public consultation sessions were also organised to coincide with the consultation period, where planners were available to answer questions from members of the public. These sessions took place in Ballymun Civic Centre on the following dates: -

Thursday 6 <sup>th</sup> April:	17.30 - 19.30
Saturday 22 <sup>nd</sup> April:	10.30 - 12.30
Wednesday 26 <sup>th</sup> April:	10.00 - 12.00

The City Council invited interested parties, individuals and groups, including children, to make submissions or observations with respect to the draft Local Area Plan during the public consultation period.

This Chief Executive's Report is prepared in response to the submissions received during the Draft LAP public consultation period.

### **2.3 Next Step: Adoption / Amendment of Plan**

The elected members are invited to consider the Draft Ballymun Local Area Plan and the Chief Executive's Report on submissions made during the public consultation process. During this period of consideration councillors are invited to submit motions.

A second Chief Executive's Report will be prepared addressing the issues raised in the motions and this will be circulated to the members of the City Council. The Councillors will then be invited to consider both reports and to either adopt the Plan or to make alterations. If the decision is made to materially alter the LAP, these material alterations will be placed on public display for public consultation for a 4 week period. In addition, all amendments will be subject to strategic environmental assessment and appropriate assessment and the findings of same will also be placed on public display.

### **3 Submission Received**

A total of 226 no. submissions were received by Dublin City Council during the consultation period, please refer to Appendix 1 for list of names and/or organisations. The purpose of this report is to summarise these submissions and present the Chief Executive's recommendation.

In accordance with the Planning Acts, the issues raised in the submissions by the Minister for Housing, Planning, Community and Local Government and the National Transport Authority are dealt with separately to other submissions received. For clarity all submissions received from prescribed by bodies are set out in Section 3.1 and responded to individually.

All other submissions received are grouped together into themes, summarised and responded to within Section 3.2 below. Further detailed summaries of individual submissions are included within Appendix 2.

#### **3.1 Chief Executive's Response to Prescribed Bodies**

##### **3.1.1 Department of Housing, Planning, Community and Local Government (Submission No. 69)**

###### **Submission Summary:**

The Department considers that the Ballymun Draft Local Area Plan 2017-2023 provides a comprehensive framework for the continued development and regeneration of this important part of Dublin City and in particular, for the planned future growth of new housing and employment development in tandem with the necessary supporting community and physical infrastructure.

The Local Area Plan (LAP) details the strong leadership of the City Council in the acquisition of the Ballymun shopping centre and the proactive efforts to develop this and other development sites as a focus for the regeneration strategy for Ballymun.

The submission considers that the LAP would benefit from a schedule/table of the potential housing sites with an estimate of housing yield as this would assist in the monitoring of LAP implementation and the planned new housing delivery.

The submission considers the site design guide provided in Chapter 6 to be useful in assisting the design of development proposals/projects for the individual sites identified.

In terms of the sites outside the LAP boundary (sites 26-31) which are owned by the City Council, the Department does not consider it appropriate for these lands to be included in the Ballymun LAP as it does not extend to the adjoining jurisdiction, and a joint LAP as provided for under S. 18(2) of the Planning & Development Act, 2000 is not being undertaken. The Council is requested to remove the current format/detail for these sites in the documentation as appropriate in order to avoid any potential ambiguity in their status as outside the Dublin City Council area.

###### **Chief Executive's Response:**

The CE welcomes the submission and support from the DHPCLG on the proposals set out within the Draft LAP, and the City's continued regeneration of this area.

A table detailing the housing potential of each of the sites has been prepared as recommended and it is proposed to include it as a new section, after 6.3 of the Plan. This will further reinforce the potential of the LAP lands only, i.e. this table will not include the M50 lands.

With regard to the proposals for Sites Nos. 26-31, these sites are contained within a separate section of the LAP (Section 6.4, to be re-named 6.5 following above); where it clearly states that the lands are located within Fingal County Council administrative area.

Given that these lands provide an important contextual basis for the LAP; that they were key lands of the Ballymun regeneration project and the '1998 Ballymun Masterplan', and that Site No. 31 straddles the two administrative boundaries, it is considered important for the LAP that the briefs for these lands are retained. Furthermore the objectives for these lands are set out in accordance with the Fingal County Council Development Plan 2017-2023, and as supported by Fingal in their submission on the Draft Plan. However to avoid any confusion or ambiguity, it is proposed to modify Chapter 6 to further differentiate the boundary and context of the LAP, and to move Site No. 30 (south of the Ballymun Industrial estate) into section 6.3, and re-number the sites accordingly. A new map will be inserted at the start of Section 6.4 (proposed 6.5) to highlight the administrative context and the text will be strengthened on this point.

#### **Chief Executive's Recommendation:**

##### Proposed Amendment No. 1:

Inset new table and text at end of 6.3, as a new section 6.4 (the existing 6.4 will be renamed 6.5 accordingly)

#### **6.4 Summary of Development Potential**

**The development potential for each site, as set out in Sections 6.2 and 6.3 above is summarised in the table below.**

<b>Site No.</b>	<b>Site Location</b>	<b>Site Area</b>	<b>Commercial / mixed use development (Indicative estimates)</b>	<b>Residential Units (Indicative estimates)</b>
<b>1</b>	<b>Shopping Centre Site</b>	<b>3.2 ha</b>	<b>41,000 sq.m</b>	<b>300</b>
<b>2</b>	<b>Site to south of Shopping Centre</b>	<b>1.5 ha</b>	<b>28,000 sq.m</b>	
<b>3</b>	<b>Site to north of Shopping Centre</b>	<b>1.2 ha</b>	<b>20,000 sq.m</b>	
<b>4</b>	<b>Balcurris, Main Street</b>	<b>0.34 ha</b>	<b>10,000 sq.m</b>	
<b>5</b>	<b>Main Street Site south of Santry Cross</b>	<b>0.8 ha</b>	<b>16,000 sq.m</b>	
<b>6</b>	<b>Coultry, Main Street (north of Boiler House)</b>	<b>1.5 ha</b>	<b>30,000 sq.m</b>	
<b>7</b>	<b>Site in front of Boiler House</b>	<b>0.1 ha</b>	<b>4,000 sq.m</b>	
<b>8</b>	<b>Coultry (north west of Coultry Park)</b>	<b>0.67ha</b>		<b>30 - 40</b>
<b>9</b>	<b>Coultry Road</b>	<b>0.95ha</b>		<b>80-100</b>
<b>10</b>	<b>Shangan Road</b>	<b>3.2ha</b>		<b>150-180</b>
<b>11</b>	<b>Silloogue Avenue</b>	<b>2.7 ha</b>		<b>110-140</b>
<b>12</b>	<b>Silloogue Road</b>	<b>2.2ha</b>		<b>100</b>

	(opposite Sillogue NC)			
13	Sillogue Road (opposite Holy Spirit Church)	1 ha		40-50
14	Balbutcher Lane South	5.2ha		285-310 (if housing) or 750 (if apartments)
15	Balcurris Gardens	0.1ha		10
16	Balcurris Close	0.07 ha		10
17	South of Santry Cross (Linnbhla apartments)	0.2ha		20-40
18	Balcurris	0.67ha		40-50
19	St. Joseph's	1.1 ha		40-50
20	Poppintree Neighbourhood Centre Extension	0.2 ha	1,000 sq.m	
21	Poppintree (opposite Poppintree NC)	0.2 ha		10-14
22	Balbutcher Lane, Cranogue Road	1.1 ha		24-28
23	Balbutcher Lane, Doon Court	0.16 ha		8
24	Belclare Way	0.26 ha		10
25	Parkview	1.9 ha	Crèche, size not specified	94
26	Site to the south of Ballymun Industrial Estate <u>(re-named Site no. 26, from Site 30)</u>	0.8 ha	Not specified	
31	M50 Lands – Balcurris (Portion of land in DCC ownership only)	1.4ha		150**
	<b>Totals</b>		<b>150,000 sq.m.</b>	<b>1511-1684*</b>
<p><b>*Please note: For the Main Street sites an overall mixed use approach is desired. The quantum allocated above for sites Nos. 2-7 have the potential to deliver additional residential units within a mixed-use format, achieving overall approximately 2,000 housing units.</b></p>				
<p><b>**A portion of Site No. 31 is located within the DCC administrative area, which is estimated could accommodate c. 150 no. residential units within the LAP functional area. The wider site located within Fingal County Council's land has the potential to deliver an additional c. 600 residential units, plus mixed use development.</b></p>				



Proposed Amendment No. 2:

Insert a new map at the start of Section 6.4 (to be renamed 6.5 as above) that clearly shows the lands within this section to form part of the Fingal County Council administrative area.

Proposed Amendment No. 3:

Move Site No. 30 (page 62): Site to the south of Ballymun Industrial Estate. Move all text and map for this site out of section 6.4 'M50 Lands' and into section 6.3 'Neighbourhood Sites', and re-number it Site No. 26; renumber all remaining site numbers accordingly.

Proposed Amendment No. 4:

Amend the first paragraph of Section 6.4 as follows:

Delete the following text (page 60):

**M50 Lands**

**The following section sets out the site briefs for the City Council owned lands to the south of the M50, which are largely all located within the administrative boundary of Fingal County Council. These briefs 'set up' a coherent build out of the lands, assisted and informed by an overarching strategic vision –see Fig. 14.**

Replace with:

**6.5 M50 Lands: Outside the LAP Area**

**The Ballymun 'M50 Lands' are located within the Fingal County Council administrative area, with the exception of a small section of Site No. 31 which at its southern end is located with Dublin City Council's administrative area. As such these lands do not form part of the Statutory Local Area Plan. The pertinent planning policy context for these lands is set out in Fingal County Council's Development Plan.**

**Largely undeveloped, these lands form an important contextual basis for the Ballymun area and the LAP itself. There were a key component of the '1998 Ballymun Masterplan' and the overall Ballymun Regeneration project; and apart from Ikea (and an ESB substation); the lands are in the ownership of Dublin City Council. The site briefs set out in this section provide for the coherent build out of the lands, assisted and informed by an overarching strategic vision. They express the vision of DCC for the lands, which is in keeping with the zoning objectives of Fingal County Council and also having regard to the proposed Metro North route. The site briefs for these sites do not however form part of the statutory requirements of the LAP, as they are not within the LAP boundary.**

Proposed Amendment No. 5:

Add text to the current objective EO7 as follows:

EO7: Development the M50 lands with a priority given to high density employment generating uses **in accordance with Fingal County Council's Development Plan.**

### **3.1.2 Transport Infrastructure Ireland (TII) (Submission No. 220)**

#### **Submission Summary:**

The Trans-European Transport Networks (TEN-T) are a planned set of transport networks across Europe, with regulations defining objectives to provide safe, secure and high-quality standards for road users and freight transport. The core network in Ireland consists of the route from Northern Ireland via Dublin to both Cork/Ringaskiddy and Limerick/Foynes, or which the M50 plays a key role. It is important that policies and objectives are drafted to allow the network of national roads to continue to play the intended strategic role etc. There is a critical need to manage these key roads in accordance with national policy as outlined in Smarter Travel (DTTAS 2009) and the provisions of Spatial Planning and National Roads Guidelines for planning Authorities (DoECLG 2012). The draft LAP includes no reference to the DoECIG Guidelines or to the critical need to safeguard function of the national road network in the area. The submission from TII recommends this requirement in reflected in the LAP.

Protection of the M50 Corridor: The TII recommends that the M50 Demand Management Report is referenced and evaluated in relation to land use planning issues; and that zoning proposals in proximity to national road networks such as the lands at Junction 4 of M5, if included in the LAP are supported by required evidence base to demonstrate that the additional traffic loading can be accommodated. The Council should ensure a consistent approach between DCC and Fingal CO. Council.

TII recommends that consideration is given to including the requirements of Chapter 3 of the DoECLG Spatial Planning and National Roads Guidelines in the LAP concerning specific objectives relating to Traffic and Transport Assessment, Road Safety Audit, Environmental Noise requirements and Signage.

#### **Chief Executive's Response:**

The CE welcomes the submission from Transport Infrastructure Ireland (TII). The submission focuses on the need to protect the M50 and to recognise its key role within the national transport framework. The key potential impacts from Ballymun on the M50 will arise from the development of the M50 lands, which is outside the scope of this Local Area Plan. Developing the lands within the DCC administrative area focuses on residential and mixed-use development along Ballymun Main Street, a street which is currently served by a high quality bus route and as per Government policy will in time be served by Metro North. This consolidation of urban lands along a public transport route is in keeping with national transport and land use policies.

The Draft LAP shows an overview of the M50 lands (Section 6.4) in relation to local transport connections, as agreed with Fingal County Council, and as influenced by the original Metro North Railway Order which included the condition to link the Ballymun M50 lands with the Metro station east of the R108; a proposal which is now a specific objective of the Fingal County Council Development Plan 2017-2023. The zoning objectives set out in Fingal's Development Plan are also significantly influenced by the proposed Metro North scheme, with the Ballymun's lands primarily zoned for employment generating/ high technology and Metro Economic Corridor. The Draft Plan shows indicative maps of how development could be accommodated on these lands in the context of their current zoning objectives. This is shown in the LAP on a contextual basis only and not on any statutory footing. Indeed the submission from the Department of Housing, Planning, Community and Local Government suggests removing reference to lands outside the LAP to avoid confusion.

It is the CE opinion that as these lands form an important contextual basis, there is merit in retaining reference to them within the LAP. They should not however form a key component of the LAP. However it is acknowledged that the M50 to the north is of major national importance, and in order to highlight this it is proposed to include a new sentence within Section 6.4 (to be renamed as 6.5, as per section 3.1.1) under the heading of the M50 Lands Overview.

### **Chief Executive's Recommendation:**

#### Proposed Amendment No. 6:

Insert a new sentence within Section 6.4 (to be renamed as 6.5, as per section 3.1.1) adjoining Fig. 14: M50 Lands Overview (page 63), as follows:

**Given the location of the M50 lands, adjoining junction 4 of the M50, a key Trans-European Transport Network within Ireland, it is imperative that all proposals for these lands take account of the M50 Demand Management Project and the Department of Housing, Planning, Community and Local Government's 'Spatial Planning and National Roads Guidelines'.**

### **3.1.3 National Transport Authority (NTA) (Submission No. 171)**

#### **Submission Summary:**

The submission from the NTA recognises Ballymun "*as a key location for development in the Dublin region. The regeneration of the existing neighbourhoods, coupled with the intensification of land uses across the plan, area, represents close integration between land use planning and transport planning and is considered to be consistent with the Transport Strategy for the Greater Dublin Area*".

The submission states that the identification of the preferred Metro alignment will be finalised by year end, 2017. Therefore the NTA is not able at this stage to confirm the level of impact with proposed development, but they are fully cognisant of the constraints, risks and context which apply to the emerging Ballymun Main Street. It is the intention of the NTA to fully engage with DCC as the scheme develops.

The submission seeks a number of amendments to the Draft to makes reference to the following:

- (i) Ballymun will benefit from the development of a core bus corridor as proposed in the NTA strategy and the recently commenced review of the city's bus services. As such the authority recommends that Objective MO3 be replaced by two objectives;
  - Facilitate the delivery of a core bus corridor through Ballymun as proposed in the NTA transport strategy.
  - Work with the NTA to ensure that the recommendations of the bus network review are implemented in Ballymun.

It is recommended that references to these two projects are made in the body of the LAP as appropriate.

- (ii) All road schemes in the area should be undertaken in accordance with the 'Principles of Road Development' as set out in Section 5.8.3 of the NTA Transport Strategy. This is to ensure that there is no significant increase in private vehicle capacity on radial roads inside the M50. The submission requests the inclusion of an additional movement objective as follows;
  - Undertake all new road schemes in accordance with the Principles of Road Development as set out in the NTA Transport Strategy.

#### **Chief Executive's Response:**

The CE welcomes the support given to the overall land use context of the LAP and its consistency with the "*Transport Strategy for the Greater Dublin Area*." It is also welcoming to note that the NTA are currently undertaking a route option selection study for a new Metro North. While this final route and station configuration is still to be determined, it is

clear that Ballymun offers a good opportunity to develop lands at suitably high density along a future Metro route, and we look forward to working with the NTA to optimise on this route and station development.

The proposed objectives set out in the submission are welcomed and it is proposed to amend the LAP to include them.

#### **Chief Executive's Recommendation:**

##### Proposed Amendment No. 7:

Amend Movement Objective M01 as follows (page 35):

MO1: Complete the outstanding pieces of road infrastructure required to enhance connectivity and to service the remaining development sites. **All new road schemes will be delivered in accordance with the Principles of Road Development as set out in the NTA's 'Transport Strategy for the Greater Dublin Area 2016-2035', (Section 5.8.3).**

##### Proposed Amendment No. 8:

Amend section 5.4.4: Bus Network:

Delete existing paragraph:

#### **5.4.4 Bus Network**

**While Ballymun is considered reasonably well served by the public bus network (see Section 3.7), one notable exception is links with the airport to the north (currently available from the Swords Road). It is an objective to seek the provision of additional bus service to provide this connection until such point as a rail link is provided.**

Replace with the following:

#### **5.4.4 Bus Network**

**Ballymun is reasonably well served by the public bus network (see Section 3.6), with Ballymun to Phibsborough identified in the NTA's *Transport Strategy for the Greater Dublin Area 2016-2035*, as a key core radial bus route. These routes are identified in the Strategy for bus improvements including as far as practicable for continuous bus priority. The Strategy does also note that this priority may be amended in conjunction with the development of the new Metro North scheme.**

**The NTA have commissioned a full re-design of Dublin bus routes (to commence June 2017) with the aim of increasing bus patronage and improving efficiency. The City Council will work with the NTA on this study, to ensure that the recommendations of the review are implemented in Ballymun, and as part of this review will seek the provision of a bus service between Ballymun and the airport (e.g. through the extension of the No. 4 bus route).**

##### Proposed Amendment No. 9:

Delete Movement Objective MO3 (page 35):

**MO3: Seek enhancements to the public bus network including linkages with the airport.**

Replace with new objectives as follows:

**MO3: Facilitate the delivery of a core bus corridor through Ballymun as proposed in the NTA transport strategy.**

**MO4: Work with the NTA to ensure that the recommendations of the bus network review are implemented in Ballymun.**

For clarity the existing MO4 will be renamed MO5 if the above proposals are approved.

### **3.1.4 Fingal County Council (Submission No. 92)**

#### **Submission Summary:**

The submission from Fingal County Council welcomes and supports the Draft LAP and in particular the vision and objectives set for the “M50” lands. It recognises and supports the important economic role of the M50 lands and is committed to working with DCC on the consolidation of these key economic lands in proximity to the proposed Metro North route, including the provision of a link under the R108 to link these lands with the future Metro stop:

*“The ‘M50’ Lands’ are zoned for high density mixed use development within the Fingal Development Plan 2017-2033 and the Dublin City Development Plan 2016-2022. These zoning objectives are based in part on the anticipated delivery of Metro North through Ballymun, which will serve these lands. It is an objective of Fingal Development Plan to link the Ballymun M50 lands directly with the future Metro stop, via a link under the R108 and this infrastructural requirement is acknowledged within the Draft Ballymun LAP... The Draft LAP notes that the extent of vacant lands along the Metro route in public ownership provides the opportunity to deliver suitable high density schemes along the Metro line, which will encourage sustainable travel patterns in the city... Fingal will work with DCC and the NTA to ensure the provision of a high quality transport system along this route.”*

Fingal County Council support the vision for site Nos. 26, 27, 28, 29 and 31, located within the Fingal Co. Co. administrative area, and notes that there is no conflict between the proposed land uses illustrated in the Draft LAP and Fingal's designated land use zoning objectives.

#### **Chief Executive's Response:**

The CE welcomes the submission and support from Fingal County Council and is also committed to working together to achieve the vision and objectives for the Ballymun M50 lands.

#### **Chief Executive's Recommendation:**

No change proposed to Draft LAP.

### **3.1.5 Environmental Protection Agency (Submission no. 96)**

#### **Submission Summary:**

##### *Comments on the Draft LAP*

The submission acknowledges the environmental related objectives within the Draft Plan including the provision/ protection of green infrastructure and biodiversity and the need to improve surface water drainage. It welcomes the undertaking of the bat survey and the need to improve access to, and use of, public transport as a means of minimising greenhouse gas emissions. The alternatives described in the SEA are noted.

The submission makes a number of specific comments/ recommendations:

- There is merit in describing in greater detail how environmental related issues such as noise and air quality issues will be mitigated / addressed.
- It would be useful to consider including an environmental summary section in the Plan, which highlights how the key environmental issues have been taken into account.

- The Plan should consider including a commitment to integrate the relevant recommendations of the National Mitigation Plan, Climate Change Adaptation Framework and any local climate change adaptation strategies that may be adopted over the lifetime of the Plan, as appropriate.
- With regard to the SEA, it is suggested that there is a commitment to taking into account the relevant recommendations of the national Draft River Basin Management Plan, upon its adoption.
- Also with regard to the SEA it would be useful to consider describing whether any alien invasive species have been identified in the plan area.

The submission highlights the next steps in the process, including the need to screen for likely significant effects where amendments are proposed, and the production of the SEA Statement following adoption of the Plan.

### **Chief Executive's Response:**

The Chief Executive welcomes the submission from the EPA. The LAP has a statutory requirement to conform to the core strategy, policies and objectives of the Dublin City Development Plan. Therefore at the outset the land use zonings applicable to Ballymun have been assessed as part of the Strategic Environmental Assessment of the Dublin City Development Plan 2016-2022. The LAP specifically states within Section 5.1 and 6.1 that all the policies and objectives of the Dublin City Development Plan (in operation at time of planning application), apply to the Ballymun LAP area. The Draft plan specifically does not include any new policies as it is considered that the policy context is set at Development Plan level, and to do so would create unnecessary duplication and could potentially lead to conflict if policies were to be introduced at local level which were not included for in the City Plan. There has been an attempt to keep the Plan as concise and "user-friendly" as possible.

With the above in mind, it is important to note that there are a significant number of policies and objectives contained within the Dublin City Development Plan 2016-2022 that specifically aim to mitigate against air and noise pollution, (Policies SI24 and SI25; and Objectives SIO20, SIO21, SIO22, SIO23, SIO24, SIO25, SIO26, SIO27, SIO28, SIO29, in addition to the requirements of Ch. 16 Development Standards). These policies and objectives apply to the whole City Council area including Ballymun. Notwithstanding this, to address the concerns of the EPA, it is proposed to insert a new section within the SEA on mitigation for Air and Noise.

With regard to climate matters, the City Council's Climate Change Strategy is currently being updated with a focus on actions and targets, and will likely include measures relating to areas of transport, energy, waste management and biodiversity setting out specific indicators for each area. The Council is also proposing to develop and adopt a local climate change action plan as part of the "National Climate Adaption Framework – Building Resilience to Climate Change". Based on the EU approach, the Framework requests Local Authorities to prepare and publish local adaption plans which will complement mitigation actions and reduce our vulnerability to the negative impacts of climate change. In Dublin City Council, the climate change action plan will be completed by end of 2018 and will contain adaption and mitigation measures. Once adopted, it will come part of the Dublin City Development Plan, and a variation to the development plan will be made in the event of the strategy requiring any material alteration to the Plan. As stated previously all policies and objectives of the Dublin City Development Plan pertain to the Ballymun area and it is not considered necessary to duplicate them.

Dublin City Council acknowledges the EPA's comments in relation to taking into account the relevant recommendations of the national Draft River Basin Management Plan, upon its adoption. It is noted that Dublin City Council is committed to implementing the programme of measures in the River Basin Management Plans. The Dublin City Development Plan 2016-2022 incorporates a number of policies and objectives which aim to promote and maintain the achievement of good status in all water bodies in the City, in this regard please refer to Section 9.5.2, policy SI4 which seeks 'to promote and maintain

the achievement of at least good status in all water bodies in the city', and also policies to promote the enhancement of aquatic ecosystems and environments, see policies SI5 and SI6. Dublin City Council is also committed to protecting the groundwater in the City through Policy SI7 which seeks to promote the progressive reduction of pollution of groundwater and prevent its further pollution. Furthermore objective SIO6 in the Development Plan seeks to 'implement the European Union Water Framework Directive through the implementation of the appropriate River Basin Management Plan and Programme of Measures'. Policy SI3 of the Development Plan also provides a commitment to ensuring that development is permitted in tandem with available water supply and wastewater treatment and to manage development , so that new schemes are permitted only where adequate capacity or resources exist or will become available within the life of a planning permission'. The SEA accompanying the Ballymun LAP does address the issue of water quality. Section 3.6.6 highlights existing environmental issues relating to water and of these maintaining or improving the water quality of waterbodies in/traversing the plan area in line with the adopted Programme of measures in the Eastern River Basin Management Plan was highlighted. However given the recently published River Basin Management Plan, is to proposed to make a minor amendment to section 3.6.2

With regard to invasive species, Section 3.3.6 of the SEA draws attention to the *Dublin City Invasive Alien Species Action Plan 2016-2020*, ([www.dublincity.ie](http://www.dublincity.ie)), which notes a recording of *Herculeum mantegazzianum* (Giant Hogweed) in the vicinity of the Ballymun Main Street and Coultrey Avenue, on the border with Fingal County Council. Within the DCC/ LAP lands, the area where the species is identified is fully developed within an urban context. It is noted that this species could be present within the Ballymun M50 lands, given the proximity to the Santry River. However these lands are located outside of the statutory LAP area it is not considered appropriate to further add to the SEA on this matter. No other known alien species have been recorded in the Ballymun area.

Finally, with regard to the request to include an environmental summary section in the Plan, it is proposed to insert a new section, 5.11 Environmental Assessment of the Draft Ballymun LAP, at the end of Chapter 5.

#### **Chief Executive's Recommendation:**

##### Proposed Amendment No. 10:

Insert a new section into the Strategic Environmental Assessment (page 126):

#### **Section 9.2.4 Mitigation for Air and Noise Pollution**

**The single biggest generator of air and noise pollution within the LAP stems from traffic on the road network. The LAP is ideally placed to help reduce traffic on the road network, providing new residential and employment opportunities along a core bus route and a future Metro route, in an area well served by community and social infrastructure. The build out of Ballymun has the ability to consolidate the city, reducing commuter traffic, which in turn will have a positive impact on noise and air pollution.**

**As required under the Dublin City Development Plan all new proposals will also have to demonstrate sustainable design and construction measures to reduce emissions.**

**The LAPs settlement strategy will also help to mitigate the impacts of noise pollution, providing new residential units within the "quieter" residential areas, and where appropriate to provide new parks alongside them. Mixed-use and commercial activity will be focused along the Main Street. Where new residential development is proposed along the Main Street, applicants will be required to have regard to the development standards set out within the Dublin City Development Plan, and in particular Section 16.10.3 Residential Quality Standards for Apartments and Houses, which provides recommendations for minimising disruption from noise in dwellings. The Development Plan also states that proposals close to noisy places, such as busy streets may need a noise impact assessment and mitigation plan.**

Furthermore, where it is considered that a proposed development is likely to create disturbance due to noise, a condition can be imposed by the planning authority on any planning permission limiting the hours of operation and level of noise generation.

Proposed Amendment No. 11:

Insert a new section into the Strategic Environmental Assessment (page 52):

Replace bullet point v. on top of page 52

From:

~~v. Preparation of the updated plans and programme of measures for the next cycle of river basin management plans, covering the period 2015-2021 are expected to be delivered in the second half of 2017.~~

To:

v. The draft second cycle River Basin Management Plan has recently been published and is out on public consultation. This draft plan provides an assessment of the pressures on the water environment in Ireland, and the proposed programme of measure to be implemented. This will cover the period from 2018 – 2021.

Proposed Amendment No. 12:

Insert a new section at the end of Chapter 5 of the LAP (page 42):

**Section 5.11: Integration of Environmental Considerations into the Plan**

A Strategic Environmental Assessment has been carried out in compliance with the requirements of Directive 2001/42/EC of the European Parliament, the objective of which is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation of the adaptation of plans.

As required by the SEA Directive and the SEA Regulations a document referred to as an SEA Statement will be produced and made available to the public following the adoption of the Local Area Plan to make known, how the SEA process influenced the outcome and identify how environmental considerations have been integrated into the final Plan.

Environmental considerations were integrated into the LAP process at a number of stages in the SEA i.e. the Scoping stage, at the Environmental Report stage and following the submissions and observations from the Environment Authorities and the public. In addition, the environmental sensitivities of the LAP area were communicated to the Plan preparation team on a regular basis from the outset of the Plan preparation process.

The Local Area Plan was also subject to Appropriate Assessment Screening under the Habitats Directive (92/43/EEC) at both the draft and amendment stage.

The overall strategy for the LAP was to facilitate and co-ordinate development opportunities on a number of key sites while addressing issues such as infrastructure, economic development, public realm and community/sporting facilities whilst achieving a sustainable city neighbourhood.

The LAP promotes the development of the remaining sites in the Ballymun to help create a sustainable compact city in which to live, work and visit in line with the environmental objectives. The development of the LAP lands will also alleviate the need to develop in areas that may not have existing suitable infrastructure. The LAP promotes the achievement of a more compact city with the reuse of the brownfield sites which will alleviate the need for sprawl to the urban fringes and into Greenfield sites. The LAP also incorporates green infrastructure into the new



developments by the provision of number of pocket parks, the provision of tree lined and landscaped streets and the creation of a green route through the M50 lands. The delivery of new homes in a sustainable manner along key public transport routes and the proposed Metro North routes will also create sustainable travel patterns thus protecting air quality and reducing city noise levels. Impacts on climatic factor will be improved with the development of a more compact consolidated and sustainable mixed use area, with good transport links, which will reduce the need to travel by private car, and thus reducing emission of greenhouse gases. While in the short term there may be emissions relating to construction and infrastructural provision, these will be short term impacts.

The Ballymun Surface Water Masterplan identified a number of outstanding pieces of infrastructure necessary to facilitate additional development and to improve two existing areas of house, including the provision of a new surface water attenuation facility, and also the need to upgrade the surface water connections of Sillogue Gardens and Coultrey Gardens.

The LAP also proposes a number of new road connections considered necessary to enhance permeability and thus reduce the need to travel by car, reduce queuing of cars/congestion and reducing distances undertaken for car trips which will positively impact on noise and air quality.

The LAP will have a positive impact in securing the cultural heritage of the area, by ensuring there is no loss or adverse impact on the National Inventory of Architectural Heritage or Protected Structures. The LAP will also seek the provision of a new civic amenity space across from St. Pappin's Church to enhance the setting of this historic building.

The SEA concluded that the LAP included sufficient mitigation measures to offset any potential impacts on the environmental receptors. It should also be noted that all the policies and objectives of the Dublin City Development Plan (in operation at time of planning application), apply to the Ballymun LAP area.

### **3.1.6 Submission from Department of Education and Skills (Submission no. 68)**

#### **Submission Summary:**

The submission from the Department of Education and Skills states that it is important to ensure there is sufficient educational infrastructure to meet the needs for the community. The Department requests that where possible site reservations are made close as possible to community facilities such as sports facilities, libraries etc, so that these can be shared between the school and community. The Department is open to the concept of multi-campus school arrangements, to reduce the land take for school development. The educational zoned lands should be placed beside open space or green belt zonings if possible to allow ready access to these amenities and other aligned facilities to future proof possible future expansion.

The submission requests the Council consider a policy of introducing a buffer zone around existing school sites, where possible to facilitate adequate separation from housing while allowing reasonable scope for increased school heights in established neighbourhoods.

For school purposes, the Ballymun area is located in the 'Finglas East\_Ballymun Dublin 1'" school planning area, as designated by the Dept. The area is currently served by 9 primary and 1 post-primary schools.

#### **Chief Executive's Response:**

Ballymun currently has 18.74 ha zoned Z15 in the Dublin City Development Plan, for educational and community use (excluding the Z15 lands of the Poppintree Community and Sports Centre and Willows FC). The LAP area contains 8 no. primary schools; one post-primary school and a CDET facility (Ballymun Youthreach). All of these facilities are

surrounded by sufficient levels of open space to permit future expansion should the need arise (with perhaps the exception of the new Coumtry Gaelscoil Bhaile Munna).

During the consultation process on the Draft LAP a number of public submissions were received seeking the provision of a new second level Irish school in the area. Given that Ballymun contains two dedicated Irish primary schools, and the presence of Gaelscoil Ui Earcain in Finglas East, it is reasonable to consider there may be a need for such a facility. The Planning Department has written to the Department of Education and Skills requesting feedback on this matter.

The most appropriate location for such new facility is considered to be on the land/ site of the current CDETB building on Ballymun Road. The current building which is in use by Youthreach, is also home on a temporary basis to Gaelscoil Bhaile Munna (during their construction period). Dating from the late 1960's/ early 1970s, this single-storey building is dated and represents an underutilisation of the existing site. This site also has the benefit of having extensive sporting pitches to the rear of the existing building.

#### **Chief Executive's Response:**

##### Proposed Amendment No 13:

Insert new text into: **5.7 Social and Community Infrastructure and Supports.**

New paragraph at end of section 5.7:

**Following submissions received on the Draft Ballymun Local Area Plan, requesting a new second level Irish school, and the creation of an Irish hub in the area, the City Council will work with the Department of Education and Skills to explore the possibility of locating a new second level school within Ballymun. Based on the existence of two Irish speaking primary schools in the area it is considered reasonable that there is demand for such an amenity. The optimum location for such a facility is regarded to be the lands of the current CDETB, next to Scoil an tSeachtar Laoch.**

**The City Council will also liaise with the City of Dublin Education and Training Board to ascertain the requirements for further educational services in Ballymun.**

##### Proposed Amendment No. 14:

Insert two new objectives into section 5.7:

It is an objective of Dublin City Council to:-

**SC3: Work with the Department of Education and Skills to determine the need for a second level Irish school in the area.**

**SC4: Liaise with the City of Dublin Education and Training Board to ascertain the requirements for further educational services in Ballymun.**

## **3.2 Summary of Individual Submissions by Topic and Response from the Chief Executive**

### **3.2.1 Chapter 1: Introduction and Policy Context**

Submission No. 174

#### **Summary of Submission:**

A submission was received seeking the boundary of the LAP, as set out in Section 1.2 of the Draft Plan, to be extended to include the lands north of Ballymun, with involvement from Fingal County Council in the development of the LAP. It requested that the LAP be linked to development of Santry Demesne to ensure coherence to the whole area and provision of necessary infrastructure; also suggesting that the LAP include for connections to the proposed Santry River Greenway, with opportunity to link Ballymun to Finglas and perhaps further to the Royal Canal Greenways.

#### **Chief Executive's Response:**

There is no provision within the Fingal County Council Development Plan 2017-2023 for a Local Area Plan for Ballymun. The boundary of the Draft Plan is consequently contained within the administrative area of Dublin City Council.

However it is agreed that the Ballymun M50 lands do provide an important contextual basis to the LAP, particularly as they are largely under the ownership of Dublin City Council. As a result the Draft LAP does provide a section on the "M50 Lands" (Section 6.4; proposed to be re-numbered to 6.5), and refers to them in the context of economic development (Section 5.3.2). The landuse context for these lands has been largely influenced by the former statutory North Ballymun LAP (adopted by Fingal Co. Co. in December 2005), and DCC has worked closely with Fingal County Council on the preparation of the current Draft Ballymun LAP; and are committed to continuing to work together to seek the development of these lands.

The Santry River intersects only very briefly within the north-east corner of Site No. 27; entering the site via a culvert under the M50 and existing via another culvert under the R108. Given the depth of the culvert and the short distance whereby it transverses these lands it is unlikely that it could be opened within the site. The LAP does however propose a "green-way" running through the M50 lands; but it should be noted that this is outside the statutory LAP.

#### **Chief Executive's Recommendation:**

Submission noted. Retain LAP boundary and contextual area as existing.

### **3.2.2 Chapter 5: LAP Development Strategy**

#### **3.2.2.1 Section 5.2 Land Use strategy**

Submission No.165

#### **Summary of Submission:**

A submission was received expressing concern regarding the proposed disposal of green spaces; that while these lands may be the subject of anti-social behaviour and illegal dumping, they should not be used for property development, but rather for environmental awareness and education, with the areas properly enforced by the Gardai. The

submission requests community engagement through provision of adequate and quality shopping facilities, transport, vibrant and safe environments before any future development can take place.

Queries whether all the proposed residential developments on these sites should proceed; and what the impact will be on existing community and social infrastructure.

#### **Chief Executive's Response:**

The Draft LAP has been prepared in the context of the Dublin City Development Plan 2016-2022, the Regional Planning Guidelines for the Greater Dublin Area 2010-2020, the Greater Dublin Area Transport Study 2016-2035, and having regard to environmental issues including those addressed in the City Council's Climate Change Strategy. These higher level policy documents all point to the need to consolidate the city, in particular in areas well served by public transport and social and community infrastructure. There has been a considerable investment in the community and recreational infrastructure in Ballymun as part of the regeneration, and there is capacity within the local schools to cater for an increase in population. The Draft Dublin City Council Parks Strategy 2016 states: *"In the North West area there is overall good access to community grade parks. Notable to this area is the cluster of contemporary designed Grade 1 parks developed as part of the Ballymun regeneration. No deficit areas are present."* The LAP proposes new housing within the neighbourhoods on sites left vacant following the demolition of the flat blocks and also on a number of small in-fill sites which currently present a poor urban form, resulting in little or no passive surveillance and anti-social problems. New local parks are proposed within the larger housing sites. It is anticipated that the development of these vacant and underutilised sites will help to support the provision of additional services in the area, in particular new retail services.

#### **Chief Executive's Recommendation:**

No alterations proposed; an appropriate mix of green space and housing is provided for in the LAP.

### **3.2.2.2 Section 5.3 Economic Development and Employment**

Submissions: No. 19, No. 17, No. 169, No. 174, No. 165, No. 182, No. 21, No. 213, No. 156, No. 13, No. 216.

#### **Summary of Submissions:**

Submissions on economic development and employment were received in relation to (i) Main Street; (ii) Neighbourhood Centres; (iii) M50 lands; (iv) Industrial Estates; and (v) economic development and environmental / arts potential; each dealt with accordingly below.

##### **(i) Main Street**

A number of submissions addressed the need to attract new investment to the Main Street, bringing in new retail, more cafes/ pubs, restaurants, hotels, professional services etc. to create a vibrant Main Street. The core of Ballymun should be ambitious and dramatic and create a sense of place that can be recognised as an urban town and not just a suburb. A business plan should be prepared that allows for the various types of commercial and professional services to be accommodated in the area. The public realm should be to an exceptional standard with high standards of maintenance. Support was expressed for the proposal to extend the central plaza to the other side of the road.

One submission queried the number of fast food outlets, off-licences and alcohol suppliers in light of the high alcohol and drug dependency rates in the area, in comparison to affordable quality food and vegetable outlets.

Prioritising the demolition of the shopping centre and the surrounding vacant buildings is key to attracting new economic development and continuing the regeneration, as it is currently a blemish on the streetscape. There is also a need to address areas of commercial activity developed by BRL that are a blight on the landscape, and it was suggested that the retail units at Santry Cross be the subject of a CPO. The submission from Ballymun Tidy Towns also requests that all vacant sites are tidied up until development goes ahead, for example the area around Silverstream nursing home on Main Street. One submission believes that the regeneration has failed as there is no focal point following the wind down of the shopping centre. Ballymun needs a new focus point.

The vacant sites offer an opportunity to address the shortfall in student accommodation which also adds economic and social value to Ballymun. The provision of high quality private accommodation in the central area was also proposed in order to change the economic profile of the area.

It was also suggested that general parking for visitors and customers to the town be provided (addressed below under the heading of Parking).

## **(ii) Neighbourhood Centres**

One submission criticised the neighbourhood centres for failing to provide focal points, due to a lack of sufficient footfall and overuse by the voluntary sector; while another sought consideration for alternative uses for the neighbourhood centre units.

## **(iii) M50 Lands**

The submission from the Ballymun4Business network states that the M50 land's are in a prime location and DCC should strongly consider retaining these lands for commercial use. It suggests actively marketing, selling, targeting and promoting this land, showcasing Ballymun as an advantageous location for large companies to locate business; to link new businesses with local workforce agency to create local employment, and seeks to be involved in the economic studies for these lands.

Another submission seeks the development of these lands as an SDZ (Strategic Development Zone) to deliver community facilities, employment and residential development.

One submission seek the establishment of an industry/commercial corridor to extend around the M50 surrounding Poppintree and St. Margaret's Industrial Estates; while another considers Ballymun and its surrounding area has great potential due to its proximity to Dublin city centre, DCU, the airport and the proposed development of Metro North. It states that there is potential to develop land here as a high end business park, similar to those in Sandyford/Dundrum etc, which will bring jobs to the area and attract a greater mix of residents. There is also potential to deliver a student hub/village to cater for DCU, DIT, and Trinity students.

The submission from the St. Margaret's Travellers Community Association expresses concern over the proposed new Dublin City Council "super depot". Residents in the St. Margaret's Park area believe that the depot will impact negatively on their lives and do not want this development in their area. The submission requests that the plan should include the concerns of the residents and requests that the City Council finds an alternative location for their 'super depot'.

There is also a submission from Ballymun Kickhams, which relates specifically to Site No. 31 within the M50 lands which is dealt with separately below, under the Sports, Recreation and Open Space section. This submission seeks the use of Site No. 31 within the M50 lands, for GAA facilities.

**(iv) Industrial Estates**

A number of submissions expressed the importance of having industry identified in the plan; while the Ballymun4Business submission seeks the retention and an increase in size of the industrial zones. Both Poppintree Industrial Estate and Ballymun Industrial Estate could be modernised and enlarged to attract more investment

**(v) Economic development and the environment / arts potential**

The submission from the Ballymun Tidy Towns seeks continued support for environmental groups; the Rediscovery Centre, GAP Ballymun and axis to promote Ballymun as an area for outsiders to visit, and to continue the great work in environmental issues and promotion of the arts in the area.

There are insufficient litter bins in new developments to support litter control. Provision of additional litter bins and cigarette bins at bus stops and outside all shops throughout the area which have been identified as litter black spots by the committee are sought. Supervalu on Main Street, the Travelodge hotel, axis and Poppintree Parade are examples of such black spots. The City Council should put a 'litter plan' and litter awareness plan in place.

The bin storage areas in newer houses should be closed off as they have become rubbish dumps.

**Chief Executive's Response:**

The issues raised above are addressed under the various sub-headings outlined.

**(i) Main Street**

Local Area Plans by their very definition and nature are prepared for areas where large scale redevelopment or regeneration is proposed. The development of the vacant sites along the Main Street forms a key element of the Draft Plan. The LAP fully recognises the need to attract additional retail, mixed use and employment generating uses along the Main Street; within an enhanced public realm with new civic spaces/ focal points.

It is a specific objective to demolish the existing shopping centre and make way for new high density, mixed use development (Objective EO2); and work is on-going in pursuing the vacating of this site, following the CPO order.

The Economic Appraisal as sought under Objective E08 has been commissioned, and will assist with the development of future sites.

The Dublin City Development Plan sets the context for uses that are permissible within Z4 areas, including student accommodation. Chapter 16 of the Development Plan provides guidance to avoid the over-proliferation of fast food outlets and off-licences in any one area. What was very clear from the retail study commissioned as part of the LAP, was the need to attract additional population and greater spending power into the area. Shops are commercial enterprises and need people to spend locally if quality food/ vegetable outlets are to be encouraged into the area. The LAP is seeking to create the environment that will support future economic growth, thus providing greater services locally to everyone.

The City Council will continue to work with Ballymun Tidy Towns and other environmental groups to enhance the local environment, addressing areas of concern (as per Objective EO13). The City Council will also through its Active Land Management Unit, seek ways of rejuvenating areas such as Santry Cross, with acquisition as an option if other approaches do not work.

## **(ii) Neighbourhood Centres**

As acknowledged in the Draft LAP (Section 3.4.2) the local neighbourhood centres, with the exception of the Poppintree Neighbourhood Centre, have struggled with occupancy rates since their construction. An economic officer has been appointed by DCC to work specifically within Ballymun and an “Economic Strategy for Ballymun, 2015” has been prepared seeking to address amongst other issues, vacancy within the Neighbourhood Centres. It is a specific objective of the Draft LAP to *Support the provision of local retail needs within the neighbourhood centres (EO4) and to Support the implementation of the Economic Strategy for Ballymun, 2015, (EO10)*. Zoned Z3 (neighbourhood Centres) under the Dublin City Development Plan, a variety of uses are permissible/ open for consideration on these sites. Designed with residential above all future uses will have to have regard to the immediate residential amenity.

## **(iii) M50 Lands**

Strategic Development Zones (SDZs) are identified by the Government for specified development, which is considered to be of economic or social importance to the State. Such designations can only be made by the Minister.

The “M50 lands” associated with Ballymun form a key contextual basis for the area, and are identified for high density employment uses, in accordance with the zoning objectives of the Fingal County Council Development Plan 2017-2023. An Economic Appraisal of these lands (as per Objective E08) has recently been commissioned to inform future use scenarios and timeframes for developing these lands, i.e. for implementing the vision for the lands as set out in the LAP; and to provide local employment. The lands are largely under the ownership of DCC (with the exception of IKEA and an ESB station). Objective EO7 seeks to develop these lands with a priority given to high density employment generating uses, in accordance with Fingal’s Development Plan.

The opposition to the “Superdepot” location is noted. It is referred to in the LAP for context; but does not form part of the statutory LAP as its location is outside of the Dublin City Council administrative area. It will be the subject of a planning application by Dublin City Council to Fingal County Council, with normal statutory public consultations applying.

## **(iv) Industrial Estates**

The Draft Ballymun LAP supports the retention of the Ballymun and Poppintree Industrial estates, as important sources of local employment; set out in Section 5.3.3 of the Draft Plan. It also promotes the development of Site No. 30; to the south of the Ballymun Industrial Estate, as a means of addressing the poor relationship between the existing industrial estate and Balbutcher Lane North. This will allow for an extension in part to this industrial estate. Outside the LAP, the lands surrounding this industrial estate to the north and east also have the potential for additional employment uses; i.e. sites 26, 27, 28, 29 and 31 located within Fingal County Council.

## **(v) Economic development and the environmental/arts potential**

Section 5.3.4 Arts and Environmental Potential of the LAP notes the important role the arts and the environment have played in the regeneration of Ballymun, through organisations such as axis, Ballymun Tidy Towns, GAP, and the Rediscovery Centre. Objectives EO12 and EO13 state it is an objective of Dublin City Council to continue to work with Ballymun Tidy Towns and other environmental groups to enhance the local environment, and to support the branding of Ballymun as a hub for arts and culture, centred on axis.

The issue of litter bins is not an issue for the LAP, but it is recognised how important it is for attracting businesses, ensuring the area is kept litter free and is well presented. The

local area office will continue to work the Ballymun Tidy Towns group to identify where new bins should be sited, having regard also to health and safety.

#### **Chief Executive's Recommendation:**

Submissions noted; matters addressed within the LAP.

Note proposed amendments No. 4 (Section 6.4: M50 Lands) & No. 5 (Objective EO7) which further differentiates the M50 lands from the statutory LAP area.

Matters outside the scope of the LAP to be addressed by the City Council:

- Refer vacant sites on the Main Street to the Active Land Management Unit within the Planning Department.
- Refer requests for addition bin provision to the Local Area Office in Ballymun.

### **3.2.2.3 Section 5.4 Movement**

Submissions: No. 17, No. 19, No. 156, No. 165, No. 216, No. 219, No. 225, No. 174 No. 211, No. 146.

#### **Summary of Submissions:**

Submissions on movement related to Metro North, road connections/ alignments, bus routes, cycle lanes and car parking.

There were a number of submissions citing the importance of Metro North for Ballymun, which will create major opportunities for the area. Some concern was expressed over the rail line creating a divide up the middle of Main Street, and it was requested that DCC should ensure that Ballymun gets the best deal during the planning process of Metro North. It was put that no option should be ruled out while the NTA/TII alignment study is ongoing, and that any commitment for Metro is premature pending conclusion of the alignment study. The use of the term "heavy rail" was queried for Metro. There was also a request for the metro stop to be located parallel to the central plaza area; and for fees / contributions for Metro North to be abolished.

It was stated that a direct bus link between the Airport, Ballymun and DCU would be advantageous and improve connectivity. The existing bus service was stated as sub-standard.

A number of submissions related to cycle lanes; for the inclusion of 'soft' bicycle lanes on roads in the area and in new developments; for direct cycle lanes between Ballymun and the city centre to encourage more people to cycle; and where possible the extension of the Dublin Bike scheme to Ballymun Town Centre.

One submission stated that the area suffers from substandard road conditions due to heavy goods vehicles using the area as a rat run. There was also a request to realign the road (and remove the bend) at Site no 20 (next to Poppintree Neighbourhood Centre); to include extra car parking spaces and relocate the bus stop.

Support was expressed for the proposal to open the Hampton Wood junction into Hampton Wood. This should be coupled with a public transport service for the area.

#### *Parking*

The submissions from the Ballmun4Business network seeks the provision of general parking for visitors and customers to Ballymun; within municipal zones as opposed to allocated to individual building requirements.

The submission on behalf of Lidl seeks an increase in the parking standard for their proposed supermarket/ discount store on Site No. 3, on the basis of the need to:

- Maximise claw-back of convenience spending leakage



- High parking levels in surrounding food retailers that are drawing spending away from the centre of Ballymun (ALDI on Santry Avenue have 1:10 sq.m parking ratio, and ample parking at Charlestown and Omni Centres)
- Notes car parking flexibility for regeneration areas contained within Dublin City Development Plan 2016-2022
- Car parking standards in Fingal County Council; 1:20 sq. m for food stores (including discount stores).

The submission seeks a specific objective of 1 car parking space per 18 sq.m. to be applied to any supermarket proposal on site 3.

### **Chief Executive's Response:**

#### *Metro North*

The Draft LAP has been prepared in the context of the 'Fingal/North Dublin Transport Study: Stage 2 Appraisal Report' (June 2015), as prepared by the National Transport Authority (NTA). This study took a fresh and comprehensive examination of the long term public transport needs of the Fingal / North Dublin region. Following this detailed examination the NTA has commenced initial work on the design and planning stages of the 'new Metro North' option, which as per the detail in the aforementioned document runs from St. Stephen's Green through Ballymun, under the Airport and on to Swords. The key objective of this first phase is to determine the 'Emerging Preferred Route'. Given the level of detail, already published by the NTA, it was considered prudent to consider the implications of the 'new Metro North' within the LAP, a statutory land use planning document, to determine the impacts on the build out and urban design of the Main Street having regard to the amount of vacant sites along this important and highly visible through-fare. It is noted that the submission from the NTA states their commitment to fully engage with the City Council as further details of the scheme emerge.

As per the wording contained in the 'Fingal/North Dublin Transport Study: Stage 2 Appraisal Report', it is recommended that the use of "heavy rail" should be omitted.

#### *Bus Network*

Following publication of the Draft LAP, the NTA announced that the Dublin Bus network will be reviewed. The 'Dublin Area Bus Network Redesign Choices Report' is subject to a separate public consultation process, with the first stage having commenced on the 6<sup>th</sup> June. As per the amendments proposed under the submission from the NTA (amendments Nos. 8 & 9), it is proposed to include an objective to "*facilitate the delivery of a core bus corridor through Ballymun as proposed in the NTA transport study*", and to the "*work with the NTA to ensure that the recommendations of the bus network review are implemented in Ballymun*".

#### *Cycling*

To create a more sustainable city, the Dublin City Development Plan in accordance with national policy, places emphasis on the need for a modal shift from motorised private modes of transport towards public transport, cycling and walking. This requires improvements to both the current public transport network and facilities for pedestrians and cyclists. The City Council is committed to working with the emerging strategy of the National Transport Authority in this regard, as per Section 2.3.6 of the City Development Plan). For new road improvements the construction of these will be required to adhere to the Design Manual for Urban Roads and Streets (DMURS) (set down in the Section 16.9 of the City Development Plan).

The predominant provision for cycling in the City Council area is by means of either on street cycle lanes or bus lanes. For Ballymun, there is a cycle lane along Main Street, adjoining the bus lane, which continues into Glasnevin and onto the city centre. This cycle lane is of greater quality in Ballymun, in the suburbs and reduces the closest it gets to the city, as road widths narrow and traffic volumes increase (for example in and around Botanic Road / Prospect Road). This is outside of the remit of the LAP area, however the

NTA's Greater Dublin Area Cycle Strategy (2013) attempts to address some of the 'pinch points' and proposes the utilisation of the Royal Canal Bank, Blessington Street Park route to access Parnell Square and O'Connell Street as an alternative route into town. North of Cross Guns Bridge, the Strategy suggests assessing the scope of a contra flow cycling for the Prospect Road, Finglas Road, Botanic Road junction. The quieter streets of the neighbourhoods are suitable for integrated cycling without the need for segregated cycling facilities.

In relation to dublinbikes expansion to Ballymun, submissions were received at Issues Paper stage requesting this service. This was examined as part of the preparation of the Draft LAP and due to funding constraints of the project, there is no definite timeframe for the expansion of the scheme to the suburbs.

#### *Roads*

Support for the link road with Hampton Woods is welcomed by the CE. With respect to the quality of other internal roads in Ballymun, this is under the control and management of the Roads Maintenance Division of the City Council.

#### *Parking*

The City is divided into three areas for the purpose of parking control as indicated on Map J of the Dublin City Development Plan 2016-2022. Ballymun falls under Parking Area 3. It is noted that Area 2 parking standards should be applicable in Key District Centres (and Ballymun is designated as such) as these areas are a focus for integrated land-use/transportation and generally allow for higher densities. The Area 2 car parking standards primarily relate to the core of Ballymun and correlate to the Z4 land use zoning i.e. along Main Street.

Section 5.4.6 of the Draft LAP references the car parking standards and policies as set out in the Dublin City Development Plan. The LAP references in particular, Section 16.38 of the Development Plan which permits the provision of car parking in excess of the maximum car parking standards. The Development Plan states this is allowable in exceptional circumstances, for example in areas adjoining different local authorities or to facilitate the sustainable development of a regeneration area. The LAP notes that Ballymun adheres to the 'exceptional circumstances' for this policy relaxation.

Such relaxations should apply until such time as a similar accessibility based parking policy and parking standards as applicable to the City Council area are adopted by the adjoining planning authorities in the Dublin metropolitan area. This is of particular importance for the LAP area as it borders Fingal County Council to the north, and there are significant variances between the car parking requirements of the two authorities. In this regard, given the regeneration policies contained within the Development Plan, the importance of building on the existing investment in the area, making it easier to do business and attracting new investment into the area, the Draft LAP notes that the City Council, will consider the relaxation of car parking standards for Ballymun when assessing the type and nature of the development proposed.

#### **Chief Executive's Recommendation:**

##### Proposed Amendment No. 15:

Amend Section 5.4.3 Metro North (page 34):

Delete the use of **heavy rail transport**

Replace with **rail transport**.

See also amendments proposed in response to the NTA submission.

Matters outside the scope of the LAP to be addressed by the City Council:

- Matters pertaining to road quality to be sent to the Roads and Traffic Section.

### 3.2.2.4 Section 5.5 Urban Form and Design

Submissions No. 167, No.169.

#### Submission Summary:

A submission was received stating that Dublin needs high-rise development and that Ballymun is the perfect location for high density, mixed use development. It suggests that 12-24 stories should be sought to ease the current housing crisis and help attract foreign investment.

A submission was also received requesting that the public realm within Ballymun needs to be of exceptional standard.

#### Chief Executive's response:

The Local Area Plan for Ballymun must be consistent with the core strategy and objectives of the Dublin City Development Plan 2016-2022, which states, within Section 15.1.1.2 SDRA 2 Ballymun:

*"To provide an appropriate urban main street context with buildings of 4-6 storeys in height along the main street, with potential for limited increases in the vicinity of a public rail station. Key gateway landmark buildings already exist framing the 1km long main street."*

In keeping with the SDRA Guidelines, the Draft LAP, Section 5.5 on Urban Design, states that *"heights of 4-6 storeys will be sought along Main Street, stepping down to 2-4 storey in the residential neighbourhoods, and taking into account heights of adjoining properties."*

In the context of the Main Street, the Draft LAP provides further guidance;

*"To provide an appropriate urban Main Street context within parapet heights of c. 18m directly to Main Street, with potential for limited increases in the vicinity of the public rail station, and on the cross-roads of the Main Street/Balbutcher Lane junction. As blocks turn away from the Main Street opportunities for some additional height may be considered having regard to prevailing height."*

The proposed heights of 12-24 storey would not be consistent with the provisions of the Dublin City Development Plan. It is considered that the Draft Plan is fully in accordance with the SDRA guidance and provides an appropriate context for this area.

There may be options for taller buildings on the M50 lands, guided by Fingal County Council's Development Plan.

To assist with the provision of high quality materials, it is proposed to carry out an audit of all materials used in Ballymun to ensure consistency in approach. It is considered that reference to this audit should be included for within the LAP as an amendment.

#### Chief Executive's Recommendation:

Proposed Amendment No.16:

Inset a new objective within Section 5.5. Urban Form and Design, as follows;

**UD5: Carry out an audit of materials within the public realm in Ballymun to ensure consistency and quality in future design responses.**

### 3.2.2.5 Section 5.6 Housing and tenure

Submissions: No. 1, No. 13, No.17 No. 46, No. 193 No. 211.

#### **Summary of Submissions:**

There were a number of varied perspectives received in relation to housing and tenure diversity. It was stated in one submission that the tenure diversity strategy for Ballymun has not worked. There was a request for the removal of any prohibition on access to HAP, RAS or rent supplement in Ballymun area; and in another that the rent bans are not understood, leading to a sense of discrimination. There was a request that sites be looked at a case by case basis as some sites can cater for more than 10% social housing as required by Part V.

Other submissions stated that there is a sufficient level of social housing built in the area to date. What is needed are more housing options in the area, mixed types, rental and purchase. Co-operatives were suggested a number of times as a means of delivering housing locally. Vacant sites were suggested as a means to address the shortfall in student accommodation which also adds economic and social value to Ballymun. There was also a request to convert vacant retail units into apartments.

One submission stated that obvious housing sites are not identified in the Plan, e.g. the land beside the co-operative housing on-site in Poppintree should be extended. This area would not be a great place for a park and would attract anti-social behaviour. There is an issue of dumping on this site which housing provision would improve.

There were some requests to re-examine the “courts” in Ballymun, as they are being overlooked in the Plan. Previous proposals to reverse the courts were discussed years ago by Ballymun Regeneration, and it was queried if these old proposals could be added to the Plan.

A concern was expressed over avoiding an over-concentration of apartments, as much of the anti-social behaviour in Ballymun exists within apartment blocks. Families in the area looking to buy want houses and not apartments. There was a request that all apartment and house sizes and should be similar to those use in the Ballymun Regeneration housing project: - 55/60 sq.m for 1 bed; 70/80 sq.m. for 2 bed; and 90/98 sq.m for 4 bed.

#### **Chief Executive's Response:**

Given the amount of available development land (33.4ha) contained in the functional area a background paper was prepared to detail the tenure mix to accurately inform and propose housing policy within the Draft LAP. This was carried out in September 2016 and was prepared by collating all of the up to date information from the relevant housing bodies (i.e. Approved Housing Bodies, Dept of Social Protection and the Housing Dept of the City Council). This analysis indicated a skewed housing mix, with an overreliance on social housing and associated social / housing support services, when compared to Dublin City figures. This report was circulated to Elected Members of the North West Area Committee, where it was discussed and changes agreed, with the Draft LAP providing a summary of the background report and an approach of providing a good mix of housing options for the area adopted. The Draft LAP proposes a wide range of housing options for the remaining undeveloped housing sites – both for rent and owner-occupancy and including affordable, student and senior citizen housing options. All of these housing options are to be provided in tandem with the Part V social housing requirements. Previously Ballymun was exempt from the Part V requirement, but this exemption was lifted in the current Dublin City Development Plan in an effort to address the housing crisis and provide additional social housing units in the area.

In order to progress the delivery of the remaining housing sites it was agreed with the Elected Members that a monitoring group would be established to review housing output and tenure in an effort to further progress the over-riding aim of the national housing

strategy – i.e. the development of sustainable mixed tenure communities ('Rebuilding Ireland: Action Plan for Housing and homelessness', July 2016).

In terms of the request to convert the vacant retail units, there are challenges facing the traditional village cores of Dublin City's suburbs where the parade of local shops have to compete within challenging economic conditions and competing discount retailers. It is important to provide interesting, enlivening streetscapes that cater for the local retail / commercial needs of an area. Ballymun is designated as Level 4, District Centre within the national retail hierarchy and is a Key District Centre as per the Dublin City Development Plan. It is crucial that the City Council continues to encourage retail / commercial provision throughout the city in accordance with this retail and settling hierarchy to retain activity within the heart / core of its suburbs and villages.

With respect to Ballymun, the City Council acknowledges in the Draft LAP that the Main Street and neighbourhood centres (with the exception of Poppintree NC) have struggled with occupancy rates since their construction. Following completion of the Retail Strategy for Ballymun a concerted effort has been undertaken by the City Council to concentrate retail activity along the Main Street, as the primary node of activity, by pursuing the Compulsory Purchase Order of the shopping centre and selling the vacant site to the north. The disposal of the northern site (site no. 3) and future planning application by LIDL will greatly assist in defining this retail core, marking the centre of Ballymun and reducing one of the 'gaps' along the Main Street. This in turn will help to attract inward investment into the adjoining vacant retail units on Main Street. The City Council have also appointed an Economic Officer to work specifically within the area and an 'Economic Strategy for Ballymun, 2015' has been prepared seeking to address amongst other issues, vacancy within the Neighbourhood Centres. It is a specific objective of the Draft LAP to *Support the provision of local retail needs within the neighbourhood centres* (EO4) and to *Support the implementation of the Economic Strategy for Ballymun, 2015* (EO10).

The vacant retail units in the area are located on Main Street, a busy radial route in and out of the city, or in the local neighbourhood centres, addressing the important local streets, adjoining schools, childcare and other social uses. Converting these units to residential would be extremely difficult in terms of complying with the private open space standards and appropriately addressing the streets and roads.

The over-riding land use strategy of the Draft LAP follows the higher level planning policy document for the need to consolidate the city, in particular in areas well served by public transport and social and community infrastructure – such as Ballymun. The site briefs provide indicative densities to promote higher densities in and around Main Street, adjoining the quality bus corridor and proposed Metro North route, with lower densities for the neighbourhood centres, adhering the established build pattern. This can take the form of a wide range of different housing options such as apartments, duplexes with apartments above or below, townhouses, student housing etc. The assessment of the quality, appearance and suitability of the schemes will be carried out as part of the planning application process, in accordance with the Dublin City Development Plan standards.

The 'Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities', as published by the Department of the Environment, Community and Local Government in December 2015 sets the national standards which all local authorities must adhere for apartment units, whether public or private. The Local Area Plan must comply with these standards. For houses, the floor areas must comply with the standards set out in Section 5.3 of the 'Internal Layout and Space provision' of the 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007) as published by the Department. These standards are more detailed than the previous standards utilised under the regeneration programme, as they take into account the number of persons living in the house and the number of floors.

Requests were received for improvements to the existing 'courts' in Ballymun, as part of this LAP process. The 'courts' in Ballymun comprise the original two storey, suburban 'Radburn' style housing. While improvement works were carried out to some of the courts (e.g. Burren Court and Dolmen Court) as part of the new 'wrap around' developments by Ballymun Regeneration Limited, it is not considered an issue for the LAP. Local Area

Plans by their very definition and nature are prepared for areas where large scale redevelopment or regeneration is proposed and the Draft LAP for Ballymun is thus focusing on providing a blueprint for the vacant sites; c. 33.4ha. The City Council is committed to improving and investing in the area as evident in the completion of the energy retrofitting of all of the two storey timber clad housing, improving the insulation and external appearance of the social housing units. This work will continue outside the remit of this land-use plan. It is also noted that the housing within the courts is both privately and publically owned. The matter can perhaps be addressed by the Housing Department as part of their on-going management of these lands.

A submission was received requesting the use of the site beside the co-op in Poppintree for housing purposes, as opposed to open space (is zoned Z9). Proposed amendments elsewhere within this report include objectives to examine this land for use as a skatepark or for allotments/ urban farm. Should the outcome of these studies indicate that the more appropriate site for these amenities is along Balbutcher Lane (site 14), then perhaps housing could be looked at instead for this site. This however would have to be led by a rezoning of the Dublin City Development Plan from Z9 (open space) to Z1 (residential). Pending the outcome of the decisions on the above, it is considered premature to initiate such a rezoning.

#### **Chief Executive's Recommendation:**

Submissions noted, no changes proposed for reasons set out above.

#### **3.2.2.6 Section 5.7 Social and community infrastructure and supports**

Submissions No. 19, No. 82, No. 193, No. 216, No. 21, No. 170, No.165, No. 82

#### **Summary of Submissions:**

A variety of issues arose under this heading:

(i) The need for continued support for Safer Ballymun to tackle anti-social behaviour in the area particularly in the vicinity of Poppintree Parade and the park. There are requests for an increase in services around safety and policing, and also for a more localised solution to be found, tackling anti-social issues. There was also a request for Garda consultation at each stage of design in new builds to advise on how to avoid design flaws including creating opportunities for anti-social behaviour. There is also a need for continued support around tackling illegal dumping, e.g. pilot mobile CCTV unit.

(ii) There should be a drop-in recycling centre, to prevent dumping of household items, manned by DCC staff (who would then bring the waste to the centre on Collins Avenue). Also a new closed off bottle bank should be provided. There should be recycling workshops with local residents to educate them and entice them to recycle more by offering money off their refuse bill each month.

(iii) The submission from Sinn Fein seeks the provision of a new Gaeltacht/Irish quarter, comprising Setanta GAA club, Scoil an tSeachtar Laoch and a new Irish secondary non-denominational school on the 'former old boy's comprehensive school' site. It further states that the public library and law services should be relocated to the plaza, allowing Setanta GAA to use the building and the lands. The submission from Naionra Glor na nGael also refers to the future use of the Ballymun library, stating that Radharc Ceilteach, Cumann Baire Setanta, Glor na nGael and Setanta Strings wish to use Ballymun Library as a cultural centre for Ballymun. The Setanta Strings orchestra has had to relocate to Riverside Tennis club due to capacity issues.

(iv) There is a severe shortage of amenities for older members of the community. Specific facilities for the elderly should be provided.

(v) Need to address shortage of facilities for people who wish to learn to dance in the area

### **Chief Executive's Response:**

'Safer Ballymun' is an action based problem solving partnership between An Garda Síochána, Dublin City Council and the community focusing on making Ballymun a safer, cleaner, greener place in which to live, work and visit. Safer Ballymun convenes a public meeting every two months where representatives from the agencies meet with local residents to discuss issues of concern to them. This initiative is managed and resourced by the City Council Area Office in Ballymun. This work will continue outside the remit of this land-use plan. The safety concerns raised in the submissions will be forwarded to the DCC Ballymun Area Office.

The Public Domain Officer(s) in conjunction with the Project Estate Officers in Ballymun target residents who are illegally dumping. The Area Office is running a dumping programme to try and target households who have no bin providers. 'Big Clean Up' events including tree planting are also run by the Public Domain officer for different areas including Ballymun. These programmes will continue outside of the remit of the land-use plan.

In preparing the 'Masterplan for Ballymun', Ballymun Regeneration Limited consulted with An Garda Síochána over the need to 'design out' anti-social behaviour and crime within new developments. Recommendations included the need for passive surveillance, buildings 'turning corners', avoiding blank gables and enhanced connectivity etc., with these principles included within the LAP under Urban Form and Design (Section 5.5.) The Dublin City Development Plan 2016-2022 (Appendix 14) also includes safety and security design guidelines to promote safety and security and avoid anti-social behaviour. It is considered that these specific objectives and guidance provide the framework to ensure safety and security are included as paramount considerations for the development of the vacant sites.

With respect to new recycling facilities Dublin City Council proposes to provide a new 'super depot' and civic amenity site (see site no. 29 in Chapter 6) on the "M50 lands". This will be subject to a separate design and planning process, which will be submitted by the City Council to Fingal County Council. The Rediscovery Centre (RDC) has recently opened its new environmental and resource recovery centre in the old Boiler House on Main Street. The RDC provides recycling and up styling services and is an accredited Discover Centre under the Discover Primary Science and Maths programme. The RDC receives funding under the Social Regeneration Fund and is supported by Objective SC2 of the Draft LAP which seeks the continuation of funding for this funding programme.

The submission in relation to the new Gaeltacht/Irish quarter is addressed below in Section 3.2.2.7 on Sports, Recreation and Open Space.

The Community Team Members of the Ballymun Area Office link with a variety of older person group networks, including University of the Third Age (U3A); Active Living, Country Crafts, Age Friendly Group, and the Ballymun Active Disability Interest Group (BADIG); to provide a wide range of services and programmes for the older citizens in the area. These groups utilise the community and neighbourhood facilities, such as Sillogue NC (BADIG's office is located here) and the sports hall in Poppintree Sports and Community Centre (HSE classes on avoiding trip hazards are run here for example). The Public Domain team also work with the Liaison Officers in the Senior Citizen complexes to improve the visual appearance of the complexes and plant more trees and plants. This work is ongoing and falls outside the remit of the land-use planning document. The Draft LAP proposes additional senior citizen accommodation including more innovative models such as stepped-down living, as per Objective HO5.

In terms of request for additional dance facilities, there is a wide range of sporting, community and educational structures located through-out the neighbourhoods which provide halls and rooms for those who wish to teach dance: -

- Ballymun Leisure Centre: multi-purpose studios

- Poppintree Sports and Community Centre: large basketball hall and small multi-purpose studios
- Marewood Senior Citizen Complex: large multi-purpose hall
- Axis: multi-purpose rooms
- The Reco: multi-purpose rooms
- Five primary schools and one secondary school: wide range of available facilities

**Chief Executive's Recommendation:**

Submissions noted, no changes for reasons set out above.

**3.2.2.7 Section 5.8 Sports, Recreation and Open Space**

Submissions: No. 17, No. 54, No. 54, No. 8, No. 94, No. 162, No. 173, No. 102, No. 218, No. 46, No. 182, No. 17, No. 18 No. 2, No. 3, No. 4, No. 5 , No. 6 , No. 7, No. 8, No. 10, No. 11, No. 12 , No. 14, No. 16, No. 20, No. 21, No. 23, No. 25, No. 26, No. 27, No. 28, No. 29, No. 30, No. 31, No. 32, No. 34, No. 35, No. 36, No. 38, No. 39, No. 40, No. 41, No. 42, No. 44, No. 45, No. 46, No. 47, No. 48, No. 49, No. 50, No. 51, No. 52, No. 55, No. 56, No. 58, No. 59, No. 60, No. 61, No. 62, No. 63, No. 64, No. 65, No. 66, No. 67, No. 70, No. 71, No. 72, No. 73, No. 74, No. 75, No. 80, No. 83, No. 84, No. 85, No. 87, No. 88, No. 89, No. 90, No. 91, No. 93, No. 95, No. 96, No. 97, No. 98, No. 99, No. 100, No. 10, No. 103, No. 104, No. 105, No. 106, No. 107, No. 108, No. 109, No.110, No. 111, No. 112, No. 113, No. 114, No. 115, No.116, No. 117, No. 118, No. 119, No. 120, No. 121, No. 122, No. 123, No. 124, No. 125, No. 127, No. 128, No. 129, No. 131, No. 132, No. 133, No. 134, No. 135, No. 136, No. 137, No. 138, No. 139, No. 142, No. 143, No.144, No. 145, No.147, No. 148, No.151, No. 153, No. 154, No. 155, No. 157, No.158, No.159, No. 161, No. 163, No.18, No. 166, No. 168, No. 172, No. 175, No. 176, No. 177, No. 178, No. 179, No. 180, No. 181, No. 183, No. 184, No.185, No. 186, No. 187, No. 190, No.191, No. 194, No. 196, No. 197, No. 198, No.199, No. 200, No.201, No. 202, No. 203, No.205, No. 206, No. 207, No. 208, No. 209, No. 210, No. 212, No. 214, No. 215, No. 216, No. 217, No. 221, No. 222, No.223, No. 226, No. 211, No. 82, No. 165, No. 182.

**Summary of Submissions:**

A wide variety and a large number of submissions were received in relation to sports, recreation and open space, detailed below as follows:

There is a need to improve amenities for young people, particularly out of hours, weekends etc, which can help combat anti-social behaviour. Amenities such as skate parks, basketball courts can help create 'places' for locals. One submission requests something like the skate park in Blanchardstown Millennium Park as an example that could be replicated in Ballymun. New parks should incorporate playgrounds, skateparks, gym equipment etc.

Support was expressed for Poppintree Park, as a good amenity which works well in the area. There were requests for a dog run (Poppintree Park suggested), with fenced area and poo bin. Also requested were dog handling courses and vet services. It was requested that Shangan Park be redesigned to make it more child friendly and to provide a new playground.

There were number of submissions seeking the provision of a communal floodlight, all-weather sports pitch that can be used by all sports groups and schools from the area, ideally managed by the City Council, and requesting that such a facility not have an anchor tenant that may lead to the exclusion of some clubs over others. The submission from Cumann Báire Setanta (hurling and camogie club) expressed an interest, along with any other club/group that may use that facility, in being part of the management



committee of such a facility. Their submission seeks this facility in the heart of Ballymun, citing site No. 14 (Balbutcher Lane) as an ideal location.

The land to the rear of the old Trinity Comprehensive School was also cited as an area for improved sporting amenities; including the repair to the Futsal dome.

There was a request that Ballymun United FC should be expanded towards Mayestown Downs.

The submission from the Three Bridges Boxing Club is seeking the provision of a new club premises to increase visibility and be more accessible for young people. Formed in 2010, their membership includes boys and girls from the settled and traveller community. They are affiliated to the IABA with many young people boxing on a weekly basis. Since 2014, the club has been located in a small room at the back of the stage in Virgin Mary School.

The submission from Ballymun Kickhams seeks the development of Site No. 31 of the LAP (between the Ballymun Industrial Estate and the R108) for a new GAA centre, to provide a new home for the club. This new facility would be funded and managed by DCC, with a contribution from Ballymun Kickhams through fundraising and the disposal of their own lands in Collinstown Lane. The proposed GAA centre would include the following components:

- Fully enclosed and secure site
- Hard surface car park with lighting
- Full size, floodlit and enclosed (with low level fencing) grass GAA pitch
- Full-size, floodlit and enclosed (with low level fencing) all-weather GAA pitch
- Full-size and enclosed (with low level fencing) grass GAA pitch
- Netting (for stopping balls) around the pitches and behind the goals.
- Clubhouse – to include minimum 6 dressing rooms, equipment room, referees' room, meeting rooms, gym, physio room, shop, sports hall (suitable for basketball, badminton etc).

The submission states that the club do not wish to operate a bar within its pavilion. It also states that they would encourage local schools to play their school matches in the facility and that the facility would be available for weekday use for the local community groups.

A large number of submissions were received in support of the Ballymun Kickhams submission to the Draft Plan, as it will bring the core element of the club closer to Ballymun. The existing location causes difficulty in attracting children to the club due to its distance from Ballymun.

The submission from Ballymun4Business supports the relocating of Ballymun Kickhams to the centre of Ballymun, but they believe "*The M50 land's are in a prime location and DCC should strongly consider retaining these lands for commercial use*".

Submissions were received requesting greater community involvement in the provision of community gardens/ spaces, allotments, biodiversity sites; in particular due to the existing allotments being provided on a temporary basis.

A submission was received requesting land allocation for an urban farm to grow organic fruit and vegetables (c. one quarter of an acre) for business purposes/ social enterprise. A second submission was received in support of this proposal, suggesting the M50 lands.

The submission from the Sandyhill/Balbutcher Community Garden Project proposes the establishment of a city farm in Ballymun. The proposal notes that the previous Dublin City Development Plan 2011-2017 included an objective to establish a city farm, an objective which is not contained within the current Development Plan. The submission requests that this objective is reinstated as an objective of the City Council and that the identified area in Ballymun is set aside for that development. The submission identifies site No. 14 (Balbutcher Lane) as a location for this proposal. The benefits of a city farm, as submitted, are:

- Create a significant visitor/tourist attraction
- Provide opportunities to run educational courses and workshops, both short and long term across a number of topics from horticulture to animal husbandry
- Provide centre for a farmers market supporting artisan producers
- Could link in with third level institutions e.g. DCU, Blanchardstown IT and the National Botanic Gardens and draw those institutions in to the community
- Form part of a suite of visitor/tourist attractions in the area which would complement each other e.g. The National Botanic Gardens, Glasnevin Cemetery and the recently opened Rediscovery Centre
- Provide excellent educational resource for both primary and secondary schools in Ballymun, the surrounding areas and indeed the City and County as a whole providing a particular visitor attraction for those institutions. All of the above would translate into social and economic benefits for the area.

### **Chief Executive's Response:**

Responses to the above submissions are grouped below under the following sub-headings: (i) Sports facilities and playing pitches; (ii) parks; (iii) skatepark; and (iv) community garden/ urban farm.

#### *(i) Sports Facilities and Playing Pitches*

In responding to the above submissions for a communal all-weather sports facility and a new GAA base for Ballymun Kickhams, there is a need to set out the existing sporting context within Ballymun which provides the rationale for the Draft LAP objectives.

It should be noted in the context of site No. 31 that the Draft LAP mistakenly refers to a site area of 7.7 ha. This figure however relates only to the land within Fingal County Council's administrative area. The site area for the entire site as shown in the Draft Plan is 10.2 ha.

In preparing the Draft Local Area Plan the City Council carried out an audit of the community and sporting amenities in the area, which includes the following:

Existing Sporting Facilities in Ballymun: (please refer also to Fig 10 within the Draft LAP, page 40)

1. Poppintree Park; 5 pitches: 1 x GAA; 1 x rugby/ camogie; and 3 x soccer (sizes) (a 6<sup>th</sup> pitch is currently unused due to drainage problems)
2. Balcurris Park: juvenile GAA pitch
3. Coultry Park: Grade A adult soccer pitch
4. Trinity Comprehensive School: outdoor tennis courts (x3), hall with gym and all weather pitch (c. 60m x 50m).
5. Setanta club: club house with all weather pitch (32m x 17m).
6. CDETB: 2 x. pitches (c. 137m x 76m, and 61m x 95m).
7. The Reco youth centre: 5-aside all weather pitch (c. 33m x 50m).
8. Poppintree Community and Sports Centre: multi-purpose sports centre with large hall, dedicated boxing centre and 5-aside all weather pitch (c. 25m x 38m).
9. Ballymun United: clubhouse for Ballymun United, 1 x soccer pitch, 1 x all-weather c. 60m x 30m); plus one DCC public soccer pitch to rear.
10. Willows FC: clubhouse with all-weather pitch (c. 30m x 42m).
11. Ballymun Sports and Fitness Centre, Main Street: swimming pool, gym, dance studio
12. Axis: arts and community resource centre with dance studio

13. Ballymun East Community centre: hall (7m x 18m)
14. Primary Schools: Indoor halls within the local schools:
15. Site No. 31 (Naul lands): one temporary adult soccer pitch.

Surrounding Ballymun, within 15 walk of Civic Centre:

1. St. Kevin's Boys FC:
2. St. Aidan's Boy Secondary School: new all-weather pitch used by school, St. Kevin's FC and Whitehall Colmcille's GAA
3. DCU Sports Campus – on site and on Ballymun Road: contains swimming pool, gym, sports hall, soccer centre with five 5-aside pitches and one larger pitch; sports campus on Ballymun Road with 2 x adult GAA pitches, 2 x soccer pitches, 1 x rugby pitch, 1 new all weather GAA pitch, and gym.
4. Trinity College Sports Campus, Santry Avenue: newly refurbished campus with 1 x rugby pitch, 1 x GAA pitch (85 x 130m), 2 x soccer pitches, 1 x hockey, and three 5-aside pitches.
5. Morton Stadium: national athletics club and home to Fingal FC

To the north of Ballymun, along the Old Airport Road (Collinstown), are a number of GAA cubs/ pitches catering for Ballymun Kickhams, Starlights and Na Fianna.

Pitch Lettings:

Information on pitch lettings was also obtained to ascertain the level of usage on DCC's public pitches:

1. Balcurris Park: Juvenile GAA Pitch; currently only used by Setanta
2. Coultry Park: Soccer Pitch: Sandyhill/ Shangan FC
3. Poppintree Park: 1 x GAA pitch used by Ballymun Kickhams, Setanta and Rosmini; 1 x rugby used by Ballymun United FC and BGF Ravens; and 3 x soccer used by Willows FC, Belclare Celtic, Buttercrust United, Shamrock Celtic
4. Poppintree; Ikea: soccer pitch: used by Ballymun United and Willows FC
5. Nearby: Johnstown Park, Finglas East: pitch No. 2 GAA pitch used Ballymun Kickhams and Na Fianna

LAP Sports Workshop:

To further inform the LAP, a sports and recreation workshop was held in the Ballymun Civic Centre on the 18<sup>th</sup> May 2016. All of the sports clubs (31 no. in total), the governing bodies, and educational providers were invited, along with local and sports staff from DCC. The session was chaired by an independent facilitator.

Following an open discussion the following were identified as priorities for the area:

1. Fix the roof of the Futsal Dome
2. Provision of a new all-weather astro pitch with lights
3. Improvement of existing facilities
4. Changing facilities for Poppintree Park and fix rugby pitch so that it is fit for purpose.
5. Need to solve anti-social problems and supply nets to Balcurris Park.

The workshop also focused on the most appropriate location for a new all-weather pitch that would serve the community as a whole. Three possible locations were discussed in detail:

- a) Rear of Trinity Comprehensive Secondary School (requires additional land-take from the City Council to facilitate this)
- b) Poppintree Park (within the main park landholding)
- c) Change the City Council pitch at the rear of Ballymun United to Astro turf.

Issues of cost, management and maintenance were discussed; while ultimately the benefit of locating any such new facility in conjunction with Trinity Comprehensive School was deemed the preferred option, as it would allow for use by the school during the day and the community at evenings and weekends; and the school already has 24/7 security in place.

#### LAP Objectives:

The above information formed the basis for the Draft LAP objectives: It is an objective of Dublin City Council to:-

SC1: Ensure that all community facilities are optimally utilised

SRO1: Work with Trinity Comprehensive School to develop a sporting hub for the school and community, and explore options to provide a new all-weather pitch.

SR02: Provide changing facilities within Poppintree Park.

SR03: Maximise the use of the sporting lands to the immediate west of Ikea for use by the whole community.

SR04: Improve use of the pitch at Balcurris Park (including the provision of new ball catching nets).

SR05: Support the provision of new sporting activities/ clubs in the area.

SR07: Review the use of the Z9 lands to the west of Carton Terrace and south of St. Margaret's Road.

SR08: Review the use of GAA facilities in the area and ascertain if additional sporting lands are required. (This objective stemmed from Councillor requests following discussions with Ballymun Kickhams).

Since the Sports workshop was held work has begun on the provision of new changing facilities along the western edge of Poppintree Park to serve the public pitches within this park. In addition new gym equipment has been installed in this park, and a new cricket crease has been provided for in the nearby Albert College Park/ Hampstead Park.

#### Draft LAP Consultation:

Since publishing the Draft Ballymun LAP a significant number of submissions were received seeking the relocation of Ballymun Kickhams from their current base at Collinstown to Ballymun. The club's own submission specifically seeks Site no. 31 to provide a new home for the club, to contain a clubhouse and 3 x adult GAA pitches. Other submissions were received seeking a centrally located all-weather pitch which would be available for use by all clubs/ the community.

There were also submissions requesting a new second level Irish school in Ballymun and to develop a new Irish quarter in the vicinity of the library, Setanta and the current CDET B. In response to this latter issue the Planning Department has written to the Department of Education and Skills to seek an understanding of the need for a second level Irish school. It is noted that Ballymun contains 2 no. primary Irish schools and that a third Irish primary school exists in Finglas East. It is also noted that the existing CDET B building on the western side of Ballymun Main Street is underutilised and dated. There is a significant amount of open space to the rear of this school, currently laid out as two pitches.

In addressing the above varied submissions; the demand for a new all-weather pitch locally, the desire of Ballymun Kickhams to create a new hub within the area and the demand for a new second level Irish School, it is considered that there are a number of options available for further consideration, each of which has advantages and disadvantages to varying degrees.

1. CDETB lands
2. Site No. 14 Balbutcher Lane
3. Site No. 31, Balcurris (west of R108)
4. Site to the rear of Trinity Comprehensive school
5. Poppintree Park

**1. CDETB Lands, Z15 lands (on the site of/ in the vicinity of the former Junior Comprehensive School, now Youthreach).**

This option could be explored in conjunction with the provision of a new second-level Irish school next to Scoil an tSeachtar Laoch, Setanta and the library; providing a centre of excellence for Irish language, sport and music, as sought for in a number of submissions. A new club house for Ballymun Kickhams could be standalone or provided in conjunction with the proposed school, thus allowing for sharing options around a sports hall, outdoor pitches and rooms. To the rear the existing open space provision could accommodate one full size GAA pitch, plus two smaller training pitches (60x 45 and 75 x 35). For comparison this is the same as provided to the front of Na Fianna clubhouse. The land is zoned for education and community use and it is within walking distance of all other schools in the area.

**2. Site No. 14: Balbutcher Lane South**

This site was also suggested as a possible location for a community all-weather pitch within the submissions received. While it is large in size (5.2ha) and could accommodate similar level provision to the CDETB site above, the level differences across this site would make it a difficult and expensive site to on which to deliver pitch facilities. The provision of a large GAA pitch on this site would undermine the ability to provide high density residential use, within close walking distance to the town centre and future Metro North. Elsewhere within this report it is recommended that this site be explored as a possible location for a skatepark (across from the Reco); and /or an urban farm/ community garden. It is considered that these options allow greater scope to be developed alongside much needed residential units. This site is zoned Z1 (residential).

**3. Site No. 31: Balcurris (west of R108)**

The submission from Ballymun Kickhams specifically seeks the provision of a new GAA facility on this site, to provide 3 x adult GAA pitches and new club house. Straddling the DCC/ Final County Council administrative border, this site is zoned Z4 (mixed use) and Z1 (residential) within the DCC lands and ME, Metro Economic Corridor within the Fingal County Council lands. The previous Metro North Railway Order included provision for a Metro Stop at Northwood, and required the provision of an underpass linking the station with the Ballymun M50 lands to the west of the R108 (now an objective of Fingal's Development Plan). Given the zoning objectives for this land and its proximity to the proposed Metro North route (and possible stop), there is a recognised need to provide high density residential/ mixed-use development on this site. However it is also considered that the site is capable of providing a new municipal sports complex, managed by DCC and catering for all local sports clubs, within a c.3 ha part of the site, provided that employment, mixed uses appropriate for the metro corridor is provided for, preferably on the R108 frontage.

#### **4. Site to the rear of the Trinity Comprehensive School**

This site was the preferred option at the sports workshop for the provision of a municipal all-weather pitch, as it could be used by the school during the day and the clubs/ community in the evenings/ weekends; would have 24/7 security as currently provided by the school, and would complement the existing sports facilities to the rear of the school. In order to provide a new pitch, part of Site No. 10 would be allocated for pitch use. The advantages include providing the local school/ children with an upgraded sports campus right in the heart of Ballymun; however the constraints presented by the site and in particular the location of the sports hall, do not allow for a full-size GAA sized pitch at this location. It would also result in the loss of lands zoned Z1 (residential) within walking distance of the Town Centre.

#### **5. Poppintree Park**

This is a large 18.5 ha park located to the west of Ballymun, with the eastern half of the park providing passive recreation, ponds, playground and wildflower swale. The western end of the park is in active sporting use, with 1 x adult GAA pitch, 1 x rugby/ camogie/ junior GAA pitch and 3 x soccer pitches. DCC are currently providing new changing facilities to serve these pitches. This site was discussed at the sports workshop as a possible location for a municipal all-weather pitch, but concerns were also expressed about security for the pitch within a park setting. The park is zoned Z9 open space and is currently laid out for sporting use.

It is proposed to amend the Draft LAP text to reflect the above options.

A proposal was also received to extend the Ballymun United grounds further west. It is noted that there is a triangular shaped site of undeveloped land between the football grounds and the Silloge Bridge, zoned for Open Space within the Fingal County Council Development Plan. This land was originally reserved to allow for Silloge Bridge to be realigned in the future. Following the outcome of the South Fingal Fringe study of the entire road network, it may be possible to allocate this land for residential or other uses, e.g. allotments. Such a decision is however premature pending the results of the Fingal road study. In order to highlight the potential of this land, it is proposed to insert a new objective into Section 5.8.

##### *(ii) Parks*

As noted above work has begun on the provision of new changing facilities in Poppintree Park and new gym equipment has been installed. The provision of a dog run within this Park is not an LAP issue, and the matter will be referred to the Parks Department for consideration.

There was also a request to redesign Shangan Park and make it more child friendly with new play equipment installed. It should be noted that the design of the current park was part of a "planning for real" exercise, designed in consultation with the residents of the surrounding houses. Unfortunately anti-social behaviour has resulted in the loss of much of the play equipment. This matter will be referred to the Parks Department for review.

##### *(iii) Skatepark*

It is agreed that the provision of skatepark within Ballymun would be a desirable amenity locally, providing diversity in sporting/ recreational amenity. Two possible locations are considered suitable for such a facility: (a) on the Z9 lands to the north-west of the Poppintree Community and Sports Complex. The centre could manage the facility and

provide important toilet and changing facilities; and (b) to the south-east of Site No. 14 (former Balbutcher Lane flats site), across from the Reco. The Reco is a purpose built youth facilities building and pending agreement could provide toilet facilities for the new skatepark.

(iv) *Community Garden / Urban Farm*

Ballymun currently has temporary allotments on Site No. 6 on the Main Street, south of the Silverstream Nursing Home. Allotments are also provided for on the site next to the Virgin Mary Church in Shangan.

In addition Ballymun Regeneration Ltd, provided temporary allotments just north of the M50 within Meakstown (next to Dog's Aid and the Equestrian Centre). The development comprised the laying out of 4,000 sq.m. of land for allotments, within a 7,409 sq.m. site; along with a watermain, taps, paving and parking. The temporary nature of these allotments was due to proposals for Metro West at the time it was submitted. The new Transport Strategy for the Greater Dublin Area 2016-2035 has no provision for Metro West. Fingal have rezoned these lands from Rural to General Employment seeking opportunities for enterprise and employment. It is considered that this site may be suitable for a local enterprise seeking land for an organic farm, as there is space alongside the community allotments for expansion.

Proposals were also submitted for a City Farm within the Ballymun LAP area; which would serve as a visitor attraction, educational resource and also a community garden. It is considered that this proposal should be explored further, with both the Z9 lands to the North-West of Poppintree Park and Site No. 14 (Balbutcher Lane) examined as potential suitable sites.

**Chief Executive's Recommendation:**

Proposed Amendment No. 17:

Amend site area for Site No. 31:

Delete **7.7 ha**

Replace with **10.2 ha**

Noted Proposed Amendment Nos 13 & 14

As included for in the response to the Department of Education and Skills:

Proposed Amendment No. 18:

Amend text in **Section 5.8 Sports, Recreation and Open Space**; (page 39):

Insert the following after the second paragraph, points 1-5:

**During the public consultation process on the Draft Ballymun Local Area Plan, an additional request was received to provide a new home for Ballymun Kickhams within the LAP area.**

Amend the following text, 3<sup>rd</sup> paragraph:

The LAP Sports Strategy is to prioritise and maximise resources within **the four following** identifiable locations:

1. Trinity Comprehensive School
2. Poppintree Park
3. Poppintree Sports and Community Centre and Lands to the West of Ikea
4. **Identify a suitable site for Ballymun Kickhams within the area**

Insert the following text after the paragraph on the Poppintree Sports and Community Centre and Lands to the West of Ikea:

***Site for Ballymun Kickhams / enhanced GAA facilities***

In order to facilitate the relocation of Ballymun Kickhams from their current home in Collinstown, to Ballymun, it is proposed to carry out detailed site analysis and feasibility studies on the following locations:

1. Lands in the vicinity of CDET B (Z15 lands in the vicinity of Scoil an tSeachtar Loach, Setanta, Youthreach (former Junior Comprehensive School))
2. Site No. 14 Balbutcher Lane
3. Site No. 31 Balcurris (west of R108) (part thereof)
4. To the rear of Trinity Comprehensive school
5. Poppintree Park

Delete the following:

**Additional Sporting Lands**

Further to the making of the City Development Plan 2016-2022 requests were received from the Elected Members to explore options of providing additional GAA facilities. It is thus an objective of this LAP process to work with City Council Departments to undertake a review of GAA facilities in the area.

Proposed Amendment No. 19:

Reword Objective SR08:

From:

**SR08: Review the use of GAA facilities in the area and ascertain if additional sporting lands are required.**

To:

**SR08: Explore options identified within the LAP for the provision of a new GAA municipal facility that will provide a new home for Ballymun Kickhams.**

Proposed Amendment No. 20:

Insert new Objective SR09:

**SR09: Explore the future use of the DCC lands to the immediate west of Ballymun United, for amenity or housing in collaboration with Fingal County Council and following the outcome of South Fingal Fringe road study.**

Proposed Amendment No. 21:

Insert new text into **Section 5.8 Sports, Recreation and Open Space**

***Skatepark***

Following the public consultation phase of the Draft Ballymun LAP requests were received to provide a skatepark in the area, which would provide a new amenity for the local community and attract people into the area. It is proposed to examine the feasibility of providing such a facility (a) on the Z9 lands to the north-west of the Poppintree Community and Sports Complex; or alternatively (b) to the south-east of Site No. 14 (Balbutcher Lane flats), across from the RECO. These locations are



adjoining an existing sports and youth centre, which could serve as a base for the facility (providing toilet, changing facilities etc).

Insert new Objective SR10:

**SR10: Explore the provision of a skate park within Ballymun within the Z9 lands to the northwest of Poppintree Community Sports Centre or Site No. 14 (beside the Reco).**

Proposed Amendment No. 22:

Amend text in Section 5.8.1 Open Space:

Delete the following paragraph:

**It is also an objective to review the land zoned Z9 to the west of Carton Terrace and south of St. Margaret's Road. This zoning was based on the Masterplan aim to provide a sporting use to these lands and link them with the Poppintree Community and Sports Centre. It was predicated on the removal of the exiting roadway at this location, which is no longer an objective under the LAP. Furthermore with a long-term objective to develop the lands north of St. Margaret's Road and to the west of Ikea for enhanced sporting activity an appropriate use for these lands needs to be defined.**

Replace with:

Allotments are currently provided for in Ballymun on a temporary basis on Site No. 6 on the Main Street, and next to the Virgin Mary School. In addition allotments were provided by Ballymun Regeneration Ltd on a temporary basis at Meakstown, located next to Dog's Aid and the purpose built Equestrian Centre (See Fig 5: Social Infrastructure). At the time it was not envisaged that the latter facility would remain long-term as it was located along the line of the proposed Metro West. With Metro West no longer part of the TII's Transport Strategy for the Greater Dublin Area 2016-2035, it may be possible to extend this facility to cater for additional allotments and/or local enterprise.

Within the LAP area it is proposed to explore other options for the provision of community gardens/ allotments. These may be part of a standalone facility or combined with the provision of a City Farm as advocated for during the public consultation phase of the LAP. Possible locations include (a) on the Z9 lands to the north-west of the Poppintree Community and Sports Complex; or (b) within Site No. 14 (Balbutcher Lane flats). The latter site is zoned Z1 with an objective to provide a new park/ open space as part of the scheme. It may be feasible to allocate the open space provision for allotments/ community farm, without unduly undermining the site's available to provide housing locally. Smaller allotment facilities may also be possible on small infill sites.

The Z9 lands to the west of Carton Terrace and south of St. Margaret's Road have been included for above as a possible location for a skatepark and also a community farm/ allotments. There is a need for a detailed review of these lands as part of implementing the LAP.

Amend SRO7:

SRO7: Review the use of the Z9 lands to the west of Carton terrace and south of St. Margaret's Road, **to provide for residential development on the western half of the site and to explore the provision of a skatepark and / or allotments and a community farm. An alternative suitable location for these uses may be Site No. 14: Balbutcher Lane. (this may involve a variation to the City Development Plan)**

Following the above, amend text within Site No. 14: see below in Section 3.2.3.1.

Matters outside the scope of the LAP to be addressed by the City Council:

- Refer request for a dog run within Poppintree Park or alternative location to the Parks Department.
- Refer requests for redesign and play equipment within Shangan Park to the Parks Department.

### **3.2.2.8 Section 5.9 Green Infrastructure and Biodiversity**

Submissions: No. 19, No. 182, No. 216.

#### **Summary of Submissions:**

Landscaping of new developments should include plants and trees that support the biodiversity plan for Ballymun particularly pollinator friendly plants. There is a need for improved planting in existing residential areas to improve areas and create a sense of pride in the area. Tree stands should be fitted with weed membranes or cemented as they are an eyesore and catch rubbish and weeds. The maintenance of tree bases along Balbutcher Lane and Poppintree Parade is poor; litter is collecting, shrubs are not trimmed and some of the metal surrounds are broke/ out of shape, needing repair. All grass verges should be trimmed and fitted with metal mowing edging to prevent growing into footpath and there should be a weed eradication plan to get rid of weeds on cobble lock pavements.

#### **Chief Executive's Response:**

It is a specific objective of the Draft LAP, G11, to continue to support and implement the recommendations of the Biodiversity Action Plan (2008, 2014), and G12, to ensure that all new streets are appropriately landscaped and tree lined.

Maintenance of tree stands, grass verges and weed treatment are operational matters for the City Council and will be referred to the Parks Department.

#### **Chief Executive's Recommendation:**

Submissions noted, matters are addressed in the LAP.

Matters outside the scope of the LAP to be addressed by the City Council;

- Refer concerns over tree pits, grass verges and weed eradication to the Parks Department.

### **3.2.2.9 Section 5.10 Drainage & Water**

Submissions: No. 165, No. 211.

#### **Summary of Submissions:**

There is inadequate water/ sewerage infrastructure in the area, in particular near the Courts. There is a need to fully implement the Moylan Report on drainage, included remedial works to Coultry Gardens, Sandyhill Gardens, Shangan Gardens and Sillogue Gardens.

### **Chief Executive's Response:**

It is a specific objective of the Draft LAP (Objective DW1) to continue to implement the Ballymun Surface Water Masterplan including the provision of necessary upgrading works to the surface water network within the 1960's housing areas of Sillogue Gardens and Coultry Gardens.

All new developments will be required to demonstrate sufficient capacity in the water/drainage system, including the provision of segregated drainage systems and Sustainable Urban Drainage Systems (SUDS); as per LAP Objective DW3; and Dublin City Development Plan policies and objectives SI1, SI2, SI3, SIO1, SIO2, SIO3, SIO4, SI18, SIO13, SIO14

### **Chief Executive's Recommendation:**

Submissions noted, matters are addressed within the Draft LAP and the Dublin City Development Plan.

## **3.2.3 Chapter 6: Site Briefs**

### **3.2.3.1 Section 6.2 Main Street Sites**

#### ***Sites Nos. 1 & 2: Shopping Centre site and Site to south of shopping centre***

Submissions: No. 169, No. 182.

### **Summary of Submissions:**

The submission from Musgraves welcomes the proposal for high density mixed use development on these sites and the associated requirements for public realm improvements and road upgrades on Gateway Crescent, Sillogue Road and the Sillogue Link Road, to generate further activity on Main Street. It states however that Sites 1 and 2 should be the "retail core" within Ballymun and the starting point for any sequential test within the LAP area, as opposed to site No. 3. New comparison and convenience retail development should be directed to these sites in the first instance.

Support was expressed for the proposal to extend the central plaza to the other side of the road, and the breaking up of the shopping centre site, rather than providing for a "block" type shopping Centre.

### **Chief Executive's Response:**

The CE welcomes the support for the town centre proposals including the proposal to include a new central plaza on Main Street.

As set out within the Site Briefs for Sites Nos 1, 2 and 3 of the Draft LAP, a 'Future Development Strategy' for the town centre lands was prepared in 2013, which facilitated the incremental / phased delivery of the town centre site (west of Main Street). The strategy identified and acknowledged the immediate lack of convenience retail shopping within Ballymun, which was supported in the recently commissioned retail study for the LAP. Site No. 3 to the immediate north of the existing shopping centre site is vacant and immediately available to deliver on this. The existing shopping centre site which was purchased by the City Council in December 2014 has been the subject of a CPO process (confirmed January 2017) and the City Council is engaging with the remaining tenants to fulfil the legal obligations of this order. Given the constraints presented by the existing shopping centre, the time required to fully de-tenant and demolish the centre, and the immediate need for additional retail, Site No. 3 is believed to be the best available site for immediate retail provision, providing the necessary retail function. In addition its Main

Street presence will signify a positive change helping to attract future redevelopment. The LAP states that it is the intention to concentrate the retail offering on the western side of the Main Street and the more civic functions on the eastern side. Following the recent disposal of Site No. 3 to LIDL it is hoped that a planning application will be lodged in the near future for a new retail store.

**Chief Executive's Recommendation:**

Submission noted, no alterations necessary.

**Site No. 3: Site to the north of shopping centre, (also relates to section 5.3.1 Main Street (retail))**

Submission No. 146.

**Summary of Submission:**

The submission by LIDL Ireland relates to their recent acquisition of Site No. 3, dealing with two issues (i) parking as addressed above; and (ii) retail capacity. In relation to the latter the submission raises concern that the retail figures set out in the Retail Study could be viewed as 'caps', irrespective of their intention as 'direction fingers' or guides by planning decision makers. Concern that the low and high capacity scenario figures do not provide much room for wider retail development and may prejudice potential investment in the core of Ballymun.

The submission proposes that a specific objective for the prioritisation of a mid-sized supermarket to help claw back convenience spending leakage is attached to site 3.

**Chief Executive's Response:**

In preparing the LAP and to inform the retail quantum of development appropriate for Main Street, an independent retail study was carried out by consultants on behalf of Dublin City Council in March 2016 (see Appendix 1 of the Draft Plan). This Study provides guidance on the capacity for new retail development in the Key District Centre of Ballymun, as well as advice on the nature and location of this development up to the year 2022. The Study stresses that the findings and qauntums are *"not intended to function as floorspace caps. Rather as recognised in the national 2012 Retail Planning Guidelines (Section 3.6) the floorspace estimates are intended to provide broad guidance on retail floorspace need and should not inhibit competition"*. The Planning Authority is of the same opinion, that the retail figures are only providing guidance in order to assist the future build out and development of the vacant sites. In this regard, the Study has assisted the development of a clear strategy to concentrate retail development on the west side of Main Street, with the civic functions concentrated on the east side (Section 5.3.1, Last paragraph of point no. 4); this in turn will assist in the identification of a clear heart / centre of Ballymun, with the uses clearly demarcated.

To avoid any confusion or ambiguity, it is proposed to insert additional text in Section 5.3.1 to highlight and strengthen that the stated quantum are estimates and guidance figures only.

Under the heading of Supporting Information/ Requirements for Site No. 3, the Draft LAP states *"a Development Strategy' was prepared in 2013 for the town centre lands, which identified this site for early release in order to deliver additional retail prior to the redevelopment of the main Shopping Centre site. In line with this strategy the City Council is in the process of selling this site with the aim of attracting additional retail to the area, to address the current retail seepage out of Ballymun"*. To reinforce DCC's commitment to provide additional retail at this location, it is considered that it is appropriate to specify a supermarket under the 'Proposed Use section.

### **Chief Executive's Recommendation:**

#### Proposed Amendment No 23:

Insert new text at the end of the bullet points at Section 5.3.1:

**The retail figures set out above are not intended to function as floorspace caps. Rather as recognised in the 2012 Retail Planning Guidelines (Section 3.6) the floorspace estimates are intended to provide broad guidance on retail floorspace need and should not inhibit competition. This is especially important as the vacant sites area developed and demand for retail increases.**

#### Proposed Amendment No. 24:

Section 6.2 Main Street; Site 3: Site to north of shopping centre; 4<sup>th</sup> bullet point: Proposed Use(s):

Insert new text:

- Proposed Use(s): Mixed Uses, **to include a convenience supermarket.**

### **3.2.3.2 Section 6.3 Neighbourhood sites**

#### **Site No. 10: Shangan Road**

Submissions: No. 82, No.46.

#### **Summary of Submissions:**

A submission was received requesting that the height for new buildings on site No. 10 is no higher than the existing housing in Santry. Residents in Oldtown Road and Avenue need to be involved in the design prior to public consultation. One submission cited this site as a possible option for senior citizen housing and co-operative housing.

#### **Chief Executive's Response:**

Site no. 10 is a significant site of 3.2 ha, which at its western end adjoins the rear of the Civic Centre and to the east will join up with the new 3-storey housing along Shangan Avenue, with 2-storey housing at Oldtown to the rear. The site brief for this site, divides the site into two parts A & B; with B backing onto the houses at Oldtown. The Draft LAP states in relation to site 10B: *"To the north of Oldtown Avenue; housing is required to secure the exposed rear boundaries of Oldtown. Different heights and roof types could be explored to sensitively integrate the new dwellings with the existing housing (for example, 3 storey mono-pitch to the road with 2 storeys to the rear). If apartments were located on this site 3-4 storeys would be achievable."*

It is considered that the guidance within the LAP is appropriate to the context. Requiring all new development on this site to be capped at 2-storey is inappropriate. The design of the new housing, the distances between opposing buildings, and the need to address the building context along Shangan Avenue will all impact upon the heights of future buildings proposed. The LAP requires new build formats to sensitively integrate with existing housing and to secure the rear boundaries of properties in Oldtown. It is considered the development of this site will significantly enhance the setting and security of housing in Oldtown which currently back onto exposed open space. All housing options will be considered to help deliver the LAP objectives for this site.

#### **Chief Executive's Recommendation:**

No alterations proposed for reasons set out above.

**Site No. 11: Sillogue Avenue**

Submission No.165.

**Summary of Submissions:**

The submission queries why the expired planning permission Reg. Ref. 3337/07 had only 61 units, and the LAP proposes 110-140 units.

**Chief Executive's Response:**

As stated within the Draft LAP, the previous planning permission 3337/07, only related to part of this site. The site outline for 3337/07 only equates to approximately one-third of overall site No. 11.

**Chief Executive's Recommendation:**

Submission noted, matter is addressed in the LAP.

**Site no. 12: Sillogue Road (opposite Sillogue NC)**

Submissions: No. 141, No. 219.

**Summary of Submissions:**

This site should be developed for housing with a small area for green space, as the site is currently a dumping ground for rubbish and anti-social behaviour. Co-op housing suggested.

**Chief Executive's Response:**

As sought for, the Draft LAP shows this site for new housing development, with a new green space/ local park to be located directly opposite the Sillogue Neighbourhood Centre. All forms of housing options will be considered to help implement the objectives of the LAP, including co-operative housing.

**Chief Executive's Recommendation:**

Submission noted, matter is addressed in the LAP

**Site No. 13: Sillogue Road (opposite Holy Spirit Church)**

Submission No. 219.

**Summary of Submission:**

This site should be developed for housing with small area for green space, as the site is currently a dumping ground for rubbish and anti-social behaviour. Co-op housing suggested.

**Chief Executive's Response:**

As sought for, the Draft LAP shows this site for new housing development, with a new green space/ local park to be located directly opposite the Holy Spirit NS. All forms of

housing options will be considered to help implement the objectives of the LAP, including co-operative housing.

**Chief Executive's Recommendation:**

Submission noted, matter is addressed in the LAP

**Site No. 14: Balbutcher Lane South (page 53)**

Submissions: No. 141, No. 219, No. 145, No. 195.

**Summary of Submissions:**

Submissions were received stating that this site, No. 14 (parcels A,B,C) should be used for housing and not for sporting uses, as there is a shortage of accommodation. To develop it for sports grounds should leave a large section of Balbutcher Lane isolated and dangerous for pedestrians, and lead to anti-social behaviour. There is a request for it to be developed as co-operative housing with a green area. Requests were also received to explore this site for the provision of a communal community floodlit pitch and also for the provision of community gardens and a community farm (the latter two issues covered above under Sports, Recreation and Open Space in Section 3.2.2.7 above)

**Chief Executive's Response:**

Site No. 14 was formed following the demolition of the Balbutcher Lane flats and Plunkett Tower (total of 282 no. units). It is zoned Z1 in the Dublin City Development Plan and the Draft LAP shows the site as capable of providing in the order of 285-310 housing units (if developed at a low-medium density) or in the order of 750 units if developed as apartments. Located immediately behind the shopping centre site it is centrally located within the heart of Ballymun and easily accessible. The LAP also includes a specific objective (SRO6) for a new local green as part of the redevelopment of this site, as shown within the site brief indicative layout.

The site brief for site no 14 states *"it is an objective of the LAP (SR08) to undertake a review of the GAA provision in the area. This may impact on the development potential of this site"*. As discussed in detail above, the LAP is proposing to examine 5 sites as possible locations to accommodate Ballymun Kickhams. Given the level differences on this site, it is not considered an ideal location for new pitches. As also detailed above under Sports, Recreation and Open Space, the LAP is proposing to explore options for a skatepark in Ballymun and for the provision of allotments either standalone or as part of a new community farm. Proposed amendments to SR07 above, state it is an objective of Dublin City Council to *Review the use of the Z9 lands to the west of Carton terrace and south of St. Margaret's Road, exploring the provision of a skatepark and / or allotments and a community farm. An alternative suitable location for these uses may be Site No. 14: Balbutcher Lane.* Having regard to this proposed new objective, it is proposed to insert new text into Site. No. 14.

**Chief Executive's Recommendation:**

Proposed Amendment No. 25:

Delete the following sentence, (from the site brief for site no 14):

**It is an objective of the LAP (SR08) to undertake a review of the GAA provision in the area. This may impact on the development potential of this site.**



Proposed Amendment No. 26:

Replace the above deleted text (page 53) with the following new text:

**It is an objective of the LAP (SR07) to explore sites for the provision of a new skate park, community garden and for a community farm, with Site No. 14 identified as one of two possible sites to serve all or some of the above. No such provision should account for the entire site, and such a provision would account for the open space requirement as per objective SR06.**

**Site No. 17: South of Santry Cross (Linnbhla apartments)**

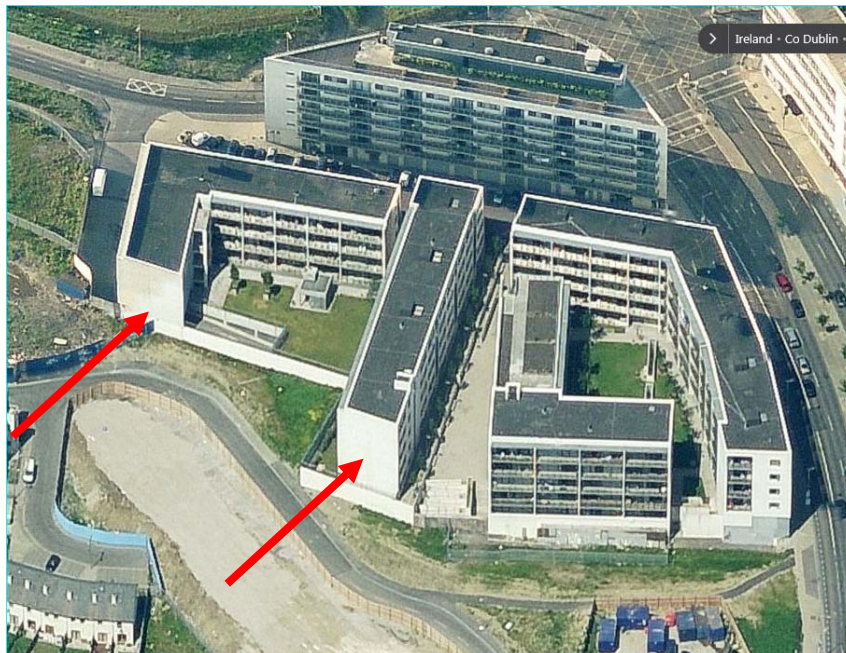
Submissions: No. 15, No. 57, No. 76, No. 126.

**Summary of Submissions:**

Submissions were received objecting to the proposed development at Site No. 17, next to Linnbhla apartments at Santry Cross. The objections believe the proposed development will result in a loss of sunlight, blocked views, reduced privacy, and will make Linnbhla feel very enclosed. There is also concern regarding vandalism and anti-social behaviour that any new development might bring. While antisocial issues have eased since the flats were demolished, the existing residents are still paying for private security. The density of the apartments in Santry Cross is already higher than other parts of Ballymun and this will only make the situation worse.

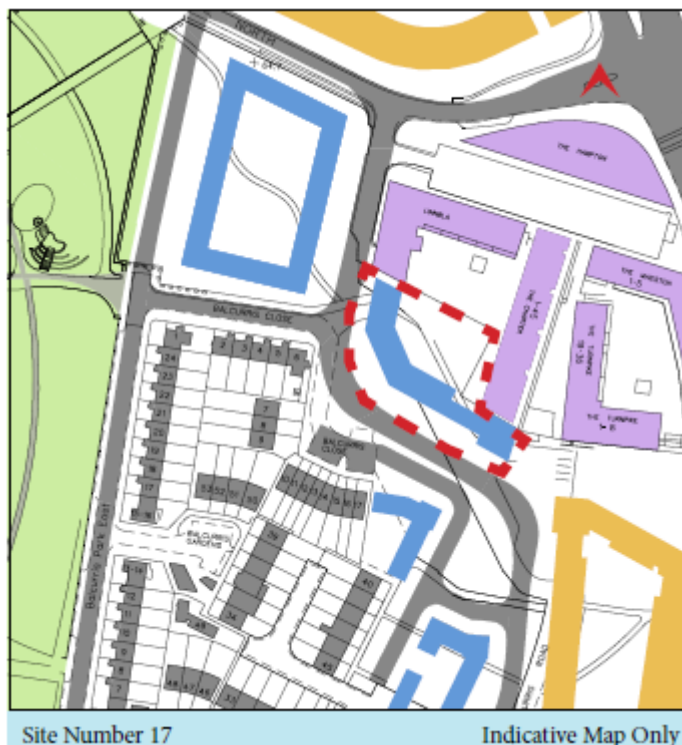
**Chief Executive's Response:**

The existing development at Santry Cross contains two large blank gables (see image below), designed to ultimately link in with a new development to "complete" the courtyard framework. The layout as constructed was a direct result of the Balcurris flat blocks remaining to the immediate south when it was constructed. The regeneration of Ballymun had secured tax incentives for the Santry Cross development site, which would mark the entrance to the 1km Main Street from the North, and for which schemes had to be developed within a specific timeframe, resulting in its development prior to the demolition of the Balcurris flats.





The LAP proposes to complete the southern portion of the Linnbhla apartment block (see below), which would address these gable walls and provide a frontage onto the proposed realigned Balcurris Road, and provide a terminating vista to the proposed new St. Pappin's Square. The realignment of Balcurris Road is particularly important in the context of this site, as leaving such an exposed "back of house" view will continually create a poor visual impact on the streetscape, and provide an environment conducive to anti-social behaviour. Providing the framework to complete the regeneration is a key priority for the Draft LAP, as set out for Site No. 17.



**Chief Executive's Recommendation:**

Retain the LAP proposals to complete this development, subject to final design, which will be the subject of a planning application.

**Site No. 19 St. Josephs (Termon Court), page 56**

Submissions: No. 1, No. 22, No. 24, No.130, No. 149, No. 150, No. 165, No. 188, No. 189, No. 192, No. 46.

**Summary of Submissions:**

A number of submissions were received, predominantly from residents of Termon Court, objecting to development at Site no. 19. The submissions express concern over loss of privacy, loss of light, inconvenience, noise pollution during construction, impact on property values, anti-social behaviour, the use of the Court for over-flow car parking and eroding community spirit in the area. Concerns over drainage and traffic issues were also raised.

There were objections to the possible demolition of 2 no. houses at Site A, and the construction of 3-storey houses. There was support for building single storey homes for the elderly with access remaining for people to get to the church and the school; and also for 2-storey housing in keeping with the existing housing. There were queries over who

would be housed in the area, and the impact on the social infrastructure in the area. There were concerns that new housing may bring further anti-social behaviour.

A key concern expressed was also around the loss of the green space. While it was acknowledged in some submissions that there are serious anti-social problems along this site; the preference expressed is for a community garden/ landscaping plan, or crèche. Bats can be found in the existing line of trees.

Some objections cited a lack of public consultation as a key reason for objection.

Some submissions sought improvements to the courtyards.

### **Chief Executive's Response:**

This site comprises of a long linear element with large tracts of land to the north and to the south just north of Carrig Road. Along its entire length the site is backed onto by rear gardens and rear laneways, with no over-looking and no passive supervision (see images below). It has been the subject of frequent "facebook parties", dumping and general anti-social behaviour. The LAP seeks to address these issues through the creation of a new traffic calmed street overlooked by housing on both sides where feasible, or on one side where the space is tight. It is not a straightforward site for development; to achieve the goal of supervision along the length of the site, will require a land transfer with the St. Laurence O'Toole Diocesan Trust (owners of the Church site). Linkage to the church and school is an important factor that will be required to be retained in promoting permeability and access to key community amenities. This can be specifically mentioned in the Plan by way of amendment.

Heights will be in the range of 1-3 storeys, with the 3-storey element only located to the northern section. It is noted that site B within this overall site, previously had planning permission for 38 no. apartments within a 4-storey building, with crèche and afterschool club at ground floor, and basement car parking (Ref. 5488/07). The Draft LAP did not include a requirement for childcare as a new facility has subsequently been provided in the upgraded and extended Poppintree Community and Sports Centre to the immediate west of Termon Court. However given the proximity of this site to the school the provision of a childcare would be considered an appropriate development and it is proposed to amend the Draft LAP to include this as a possible future use.

Some of the submissions received appeared to mistake the provisions of the LAP for a planning application. The LAP is a local interpretation of the City Development Plan, within which this site is zoned Z1 (residential). All planning applications will be the subject of detailed design and will be subject to the statutory public consultation requirements. The use of the site for senior citizen housing and for co-ops is open for consideration as part of the implementation of the LAP objectives.

An independent bat survey was specifically commissioned for the LAP area in preparing the Draft Plan, with a specific request to monitor the lands in the vicinity of St. Joseph's Church, as a result of following previous bat recordings here. While the 2016 survey did detect both Common Pipistrelle and Leisler's bat passing through, neither was confirmed to be roosting within the nearby Church buildings, and activity was regarded as being of a low level.

Requests were also received for the existing courtyards in Poppintree to be upgraded as part of the LAP/any redevelopment proposals. While it is acknowledged that Ballymun Regeneration Ltd carried out improvements to Burren Court and Dolmen Court as part of new "wrap-around" developments, this is not considered an issue for the LAP. The focus of the LAP is on providing objectives for undeveloped land. Housing within the courts is both privately and DCC owned. The matter can perhaps be addressed by the Housing Department as part of their on-going management of these lands.



*Image google maps*



**Chief Executive's Recommendation:**

Proposed Amendment No. 27:

Include a new sentence within the section Supporting Information / Requirements, at end of 2<sup>nd</sup> paragraph: (page 56)

In order to secure a design that addresses and designs out problem areas it is proposed that Carrig Road is realigned and extended north to Balbutcher Lane North, creating new residential development sites along its length. A transfer of land from the St. Laurence O'Toole Diocesan Trust (owners of the land at St. Joseph's Church) to the City Council is required to facilitate the construction of this road, and allow space for house construction fronting onto it. **Retaining linage and permeability to the Church and school is an essential requirement of any development proposal.**

Proposed Amendment No. 28:

Include within Site B, the following sentence as a new bullet point under Supporting Information / Requirements:

**The provision of a new childcare facility (crèche or afterschool) would also be considered a good use of this land, adjoining St. Joseph's NS.**

## **Site 20: Poppintree Neighbourhood Centre Extension**

Submissions: No. 141, No. 219, No. 46.

### **Summary of Submissions:**

Sites no. 20 & 21 are very small for development. Requests that this site be used for car parking to secure the viability of Poppintree Neighbourhood Centre.

### **Chief Executive's Response:**

This site comprises a linear strip of land left over from the development of the adjoining Poppintree Neighbourhood Centre (NC). It was intended as part of the Ballymun Masterplan to complete this development and provide a 'corner' element to the NC. The unfinished nature of this development creates an unfinished / blank gable which runs contrary to best practice urban design principles. The side entrance to the rear enterprise units is quite visible as is the access stairs to the residential units above. Providing development on this site would secure these elements. The indicative layout indicated in site no. 20 addresses these matters.

With respect to the need to provide additional parking for the NC, this could be provided as part of this proposal, in the form of a linear strip of parallel parking along Belclare View. Provision of parking along this stretch would reduce the internal carriageway to the south of Knowth Court, which can currently take two cars along this internal access road. This small reduction in width would reduce speeds, making it safer, as it immediately adjoins residential houses and could provide a more defined streetscape addressing Belclare View. This can be specifically mentioned in the Plan by way of amendment.



*Image: google maps*

**Chief Executive's Recommendation:**

Submission noted, matter is addressed in the LAP.

**Proposed Amendment No. 29:**

Include a new sentence within the section Supporting Information / Requirements, at end of the paragraph, for site no. 20:

Future development will be required to retain access to the rear of the Poppintree Neighbourhood Centre (c. 3.7m minimum access width), and to protect the residential amenity of the existing residential units at the upper levels of the neighbourhood centre. The proposed design should have cognisance of how it addresses the existing centre.

**The build out of this site will require the provision of additional parallel parking along Belclare View for the new mixed use development and adjoining existing Poppintree Neighbourhood Centre. Provision of this additional parking will reduce the internal carriageway to the south of Knowth Court in order to provide a more defined streetscape addressing Belclare View.**

***Site 21: Poppintree (opposite Poppintree Neighbourhood Centre)***

Submissions: No. 141, No. 219, No. 46, No. 211.

**Summary of Submissions:**

There is a request for housing on this site to help with anti-social issues.

Objection to 3-storey element and opening of the cul-de-sac on Belclare Green. Another submission believes the site is very small for development and states that the site has not been maintained by the Council, and that environmental improvements are required instead.

**Chief Executive's Response:**

Site no. 21 is situated opposite Poppintree Neighbourhood Centre. The principle of housing for this site has been established under Register Reference 2727/05 where permission was granted for 14 no. units on this site (8 no. 3-bed houses, 2 no. 3-bed apts. and 4 no. 2-bed apts), now expired. The indicative layout addresses the street, Poppintree NC and secures the exposed rear and side boundaries of the houses of Belclare Green. The removal of the cul-de-sac is shown as a potential indicative access point and would be subject to detailed design and assessment as part of a planning application for the subject site.

The CE welcomes the support of this site for new housing development as indicated in the Draft LAP.

**Chief Executive's Recommendation:**

The CE does not agree with the submissions received for the planning reasons set out above.

***Sites 22: Balbutcher Lane, Cranogue Road***

Submissions: No. 141, No. 219.

**Summary of Submissions:**

Submissions request housing on this site.



**Chief Executive's response:**

The CE welcomes the support of this site for new housing development as indicated in the Draft LAP.

**Chief Executive's Recommendation:**

Submission noted, matter is addressed in the LAP.

**Site 23: Balbutcher Lane, Doon Court**

Submissions: No. 141, No. 219.

**Summary of Submissions:**

Submissions request housing on this site.

**Chief Executive's response:**

The CE welcomes the support of this site for new housing development as indicated in the Draft LAP.

**Chief Executive's Recommendation:**

Submission noted, matter is addressed in the LAP.

**Site 25: Parkview**

Submission No. 43.

**Summary of Submission:**

The original aspirations of the plan need to be achieved, particularly with regard to economic development and social regeneration. Disappointed to see the imbalance of social housing in this area, when compared to neighbouring areas. It is crucial that Parkview development is earmarked for private residential and affordable housing to further social progress in the area and in encouraging private homeowners to remain.

**Chief Executive's Response:**

Parkview is located to the west of Poppintree Park and comprises a private residential development which was constructed by a private developer. This development is unfinished and there are a number of unfinished sites within the scheme. There are 94 no. residential units and a crèche which are remaining from the parent permission, as per the time extension permitted under Reg. Ref. 1582/10/x1. The site is currently under the control of the receiver and negotiations are ongoing between the City Council and receiver to resolve all of the outstanding issues, including the return of the unfinished sites to the Council. The build-out of the unfinished sites will be in line with the Housing Objectives as per Section 5.6 of the Draft LAP.

**Chief Executive's Recommendation:**

Submission noted, matter is addressed in the LAP.

### 3.2.3.3 Section 6.4 M50 Lands

Submissions: No. 77, No. 169.

#### Summary of Submissions:

The submission from the Dublin Airport Authority acknowledges Policy SI25 of the Dublin City Development Plan 2016-2022 regarding air and noise quality. The submission notes that the most northerly part of Electoral Division (Ballymun A) falls within the 'Outer Airport Noise Zone', and requests that the LAP includes an acknowledgement that any further proposals for noise sensitive uses falling within the outer airport noise zone will be subject to noise assessment and insulation, to ensure appropriate internal noise levels can be achieved.

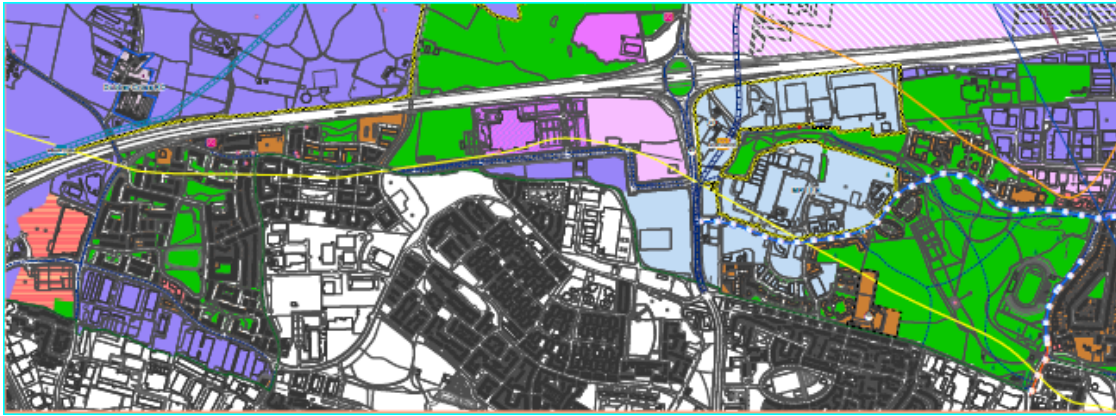
The submission from Musgrave expresses their concerns about the potential for inappropriate retail development on the "M50 Lands", Site No. 26. The Draft LAP for this site indicates "big box" type retail warehousing within the site indicating that the retail warehousing could potentially be developed across the entire site. The submission requests:

- Proposals for site 26 should not prejudice the South Fingal Fringe Study, as required by Fingal County Council's 2017-2023 Development Plan (Objective MT07)
- Any proposals for additional retail uses must be evidence based and in accordance with the principles contained in the 'Retail Planning Guidelines for Planning Authorities, 2012'. No evidence is provided in the Draft LAP or Retail Study to support the proposals for additional retail warehousing floorspace at this location.
- Concerns that the provisions in the Draft LAP may be used to promote 'Retail Warehouse Club' type uses.
- The Retail Planning Guidelines discourage retail development which relies on car borne transport on a site located adjacent to motorway network. The traffic implications of any retail development proposals close to the M50 must be considered

#### Chief Executive's Response:

The Outer Airport Noise Zone is indicated on the map/image below (yellow line). This map forms part of Fingal County Council's Development Plan, as it is best placed to show the relationship between this zone, the LAP lands and the contextual lands. As can be seen only a tiny fraction of Hampton Woods residential development is within the City Council administrative area, and as such the statutory LAP area. The DCC lands within the Outer Airport Noise Zone are fully developed.

It is acknowledged that a significant portion of the Ballymun 'M50' lands falls within this zone, and in the interest of clarity, it is proposed to include reference to such under the "Supporting Information/ Requirements" section for Sites Nos. 26, 27 and 28. It is not considered necessary to provide any further detail as the Plan states that the planning policy of Fingal's Development Plan applies to this area, which includes provision for the Airport Noise Zone.



Extract from Fingal County Council's Development Plan 2017-2023.

In relation to the submission from Musgraves, Site no. 26 is located to the east of IKEA and is part of the City Council owned lands to the south of the M50 which are located within the administrative boundary of Fingal County Council.

Chapter 6 of the LAP identifies the vacant sites in Ballymun suitable for redevelopment. A total of 31 no. sites were identified and grouped under three category headings: (i) Main Street; (ii) Neighbourhood Sites, and (iii) M50 Lands.

These site briefs illustrate how the sites could potentially be developed as stated in Section 6.1 of the Draft LAP:

*“The overall aspirations for each site are set out below, including indicative build patterns, appropriate heights, ownership etc. Site constraints and pertinent planning histories are also detailed. The estimated capacity relates to the build patterns shown on the Masterplan 2017 (Fig. 11) and is subject to further detailed design and development mix analysis (i.e. at design and planning application stage)”.*

The ‘yellow blocks’ indicated on the site brief are indicative ‘urban blocks’ and follow the same format utilised for all of the site briefs in Chapter 6 - providing an indication of how the sites could be developed. The urban blocks illustrated on Site no. 26 thus do not indicate a “big box” type retail warehousing.

It is noted that site no. 26 (and site nos. 27-31) are all located within Fingal County Council's administrative area. The objectives for these lands as set out in the Draft LAP accord with the Fingal County Council Development Plan 2017-2023, as supported by Fingal in their submission on the Draft Plan. The Draft LAP is not proposing any other zonings or uses and will thus not prejudice the South Fingal Fringe Study, as required by Objective MT07 of the Fingal Development Plan.

To avoid any confusion or ambiguity, it is proposed to modify Chapter 6 to further differentiate the boundary between the City Council and Fingal County Council and the importance of the M50 lands providing a contextual basis for the LAP. A new map will be inserted at the start of Section 6.4 (proposed 6.5) to highlight the administrative context and the text will be strengthened on this point. This matter is set out in greater detail in the response to the Department of Housing, Planning, Community and Local Government's submission.

**Chief Executive's Recommendation:**

Proposed Amendment No.30:

Insert text into the brief for Site No. 26 (page 60):

**This site is located within the Outer Airport Noise Zone.**



Proposed Amendment No. 31:

Insert text into the brief for Site No. 27 (page 60)

**This site is located within the Outer Airport Noise Zone.**

Proposed Amendment No. 32:

Insert text into the brief for Site No. 28 (page 61):

**This site is located within the Outer Airport Noise Zone.**

Please note the above site numbers are proposed to be re-numbered following the movement of Site No. 30, as per amendment No. 3 above.

Note also proposed amendments Nos. 2 (map), No. 4 (Section 6.4: M50 Lands) & No. 5 (Objective EO7) which further differentiates the M50 lands from the statutory LAP area.

### **3.2.4 Chapter 7: Implementation and phasing**

#### **3.2.4.1 Phasing (Section 7.3)**

Submission No. 46

##### **Submission Summary:**

Council should develop the bigger sites first to develop particularly those around the town centre; to have the effect of regenerating the town centre

##### **Chief Executive's Response:**

The City Council has been proactive in concentrating its efforts on the Main Street sites to continue the regeneration of Ballymun through the following actions: -

- (a) Compulsory Purchase Order (CPO) of the Shopping Centre site to provide a clear development site
- (b) Disposal of the northern site (which had no legal impediments) to the market for mixed use development
- (c) Completion of the repurposing of the Boiler House for the Rediscovery Centre as a centre of excellence for education and resource recovery, providing a 'destination' space for Main Street

In terms of a phasing strategy, Section 7.3 states *"it is the intention of the LAP to be a flexible working framework document and to respond to the evolving needs of the community and market forces. As such a specific phasing or sequencing programme is not considered necessary given the detail contained in the site briefs (Chapter 6)"*.

It is specific objective under E08 to carry out an Economic Appraisal of the mixed use sites along Main Street and the M50 lands in order to assist with the development of these. This study has been commissioned and will provide a factual appraisal to inform the development timelines assisting the implementation bodies of the LAP (i.e. Ballymun Working Group and Ballymun Civic Alliance). This study will be presented to the Elected Members.

**Chief Executive's Recommendation:**

Proposed Amendment No. 33:

Insert text into at the end of the first paragraph in Section 7.3 Phasing: -

**The Economic Appraisal of the mixed use sites along Main Street and the M50 lands (Objective E08) will provide a factual appraisal of the vacant lands and will help to inform the development timelines assisting the implementation bodies of the LAP (i.e. Ballymun Working Group and Ballymun Civic Alliance).**

**3.2.5 Additional Notes**

Submissions: No. 37, No. 140, No. 152, No. 204, No. 9

There were a number of additional submissions received which had no text or which was not applicable.

#### **4 Overall Summary of Submissions and Recommendation**

Submissions received generally welcomed the Local Area Plan and the aspirations to develop Ballymun as a sustainable town. Key areas of support included the development of the Main Street for economic and employment uses, the demolition of the shopping centre and support for Metro North. Support for developing the M50 lands as an employment hub for Ballymun was also received.

Areas of concern related primarily to two in-fill residential areas located next to Termon Court and Santry Cross (site Nos 17 and 19). The responses provided above set out the rationale behind the proposals for these two sites, which seek to create safe, secure environments that addresses the streetscape and provide a pleasant place to live.

Other key issues raised relate to the request by Ballymun Kickhams for DCC to deliver Site No. 31, in conjunction with them, as a GAA centre and a new home for the club, and for a new second level Irish school in the area. Other amenities requested included an urban farm/ allotments and a skatepark. The Chief Executive proposes a number of amendments to the Plan in addressing these requests. Key amendments proposed include examining five sites in greater detail, along with an economic feasibility for the provision of a sports centre; and exploring the use of the CDET B for a new second level Irish school, alongside Setanta and Scoil an tSeachtar Laoch, and possibly Ballymun Kickhams.

Other proposed amendments include examining both the Z9 lands to the north-west of the LAP and site No. 14 for possible use as an urban farm / allotments and/or a skatepark whilst providing for housing on the western part of the Z9 site (this will involve a variation to the City Development Plan). Given that these changes if agreed constitute material amendments to the draft plan, it will be necessary to go back out for a second period of public consultation.

## 5 Conclusion and Chief Executive's Recommendation

As outlined above the Chief Executive's Report makes a number of recommendations which if accepted would materially alter the Draft Plan, thus requiring it to go back out on public display to seek comments on the proposed amendments only.

If the proposed material amendments are not adopted, the Council can decide to adopt the Draft LAP as published or with minor non-material amendments. In this scenario the Plan comes into effect 4 weeks after adoption.

The issuing of this Chief Executive's Report (dated 09<sup>th</sup> June 2017) marks the start of the period for member's consideration, during which time members of the City Council may submit motions for consideration (last day for motions, 19<sup>th</sup> June 2017).

At the City Council meeting on the 13<sup>rd</sup> July 2017, the members of the Council may: -

**adopt the Plan as publically displayed;**

**adopt the Plan as per the proposed recommendations set out in this report (material and non-material proposals);**

**adopt the Plan as per submitted motions that do not materially alter the Plan;**

**make material amendments/ alterations to the Plan and put it back on public display; or**

**revoke the plan.**

If the Council decide not to adopt the Draft LAP but rather to make material alterations then these alterations will be placed back on public display, and the alterations will be assessed for the purposes of Strategic Environmental Assessment and Appropriate Assessment, and put on display also.

**6 Appendix 1: List of All Persons or Bodies that made submissions/ observations on the Draft Ballymun Local Area Plan.**

Number	First Name or Organisation	Surname	On behalf of
1.	Aidan	Crosbie	
2.	Aideen	Grattan	
3.	Aisling	Nolan	
4.	Aisling	Noonan	
5.	Alan	Boyle	
6.	Alan	George	
7.	Alan	Hubbard	
8.	Alan	O'Reilly	
9.	Amanda	Delaney	
10.	Amanda	Dunne	
11.	Andrew	McManus	
12.	Ann Marie	Murray	
13.	Anne	Wood	
14.	Anthony	Rock	
15.	Antoinette	Reilly	
16.	Aoife	Moore	
17.	Ballymun for Business, B4B		Robert Murphy, Chairperson
18.	Ballymun Kickhams		Dermot McMahon, Secretary
19.	Ballymun Tidy Towns Committee		Suzanne Stone
20.	Barbara	Drumm	
21.	Bernadette	Roche O'Sullivan	
22.	Bernie	Smith	
23.	Brenda	Crawford	
24.	Brian & Phyllis	Morgan	
25.	Brian	Ashton	
26.	Brian	Burgess	
27.	Brian	Moore	
28.	Brian	Noonan	
29.	Brian	Rooney	
30.	Carl		
31.	Carmel	Andrews	
32.	Cathal	Roche	
33.	Catherine	Small	
34.	Cathy	Rock	
35.	Cecily	Leonard	
36.	Cian	Andrews	
37.	Cian	Gerrard	

38.	Ciara	Byrne	
39.	Ciara	Kelly	
40.	Ciaran	Dunne	
41.	Ciaran Paul	Roche	
42.	Ciaran	Staunton	
43.	Claire	Quinn	
44.	Claire		
45.	Cliona		
46.	Cllr. Noeleen	Reilly	Sinn Féin Councillor
47.	Colin	Moore	
48.	Concepta	Dalton	
49.	Conor	Byrne	
50.	Conor	Noonan	
51.	Cora	Herbert	
52.	Cora	Vizzard	
53.	Cumann Báire Setanta		Tommy Gibson, P.R.O
54.	Cumann Báire Setanta		Liam Ó Briain, Secretary
55.	Daire	Andrews	
56.	Daragh	McArdle	
57.	David	Coyle	
58.	David	Lynch	
59.	David	Quinlivan	
60.	Deborah	McLoughlin	
61.	Declan	Bolger	
62.	Declan	Cody	
63.	Declan	Kilmartin	
64.	Declan	O'Brien	
65.	Declan	Small	
66.	Deirdre	Adamson	
67.	Deirdre	Byrne	
68.	Dept. of Education & Science		
69.	Dept. of Housing, Planning, Community & Local Government		
70.	Dermot	King	
71.	Dermot	Leahy	
72.	Des	Nolan	
73.	Dillon	Keating	
74.	Dolores	McKenna	
75.	Donal	Noonan	
76.	Donna	Barry	
77.	Dublin Airport Authority		

78.	Eamonn	Donnelly	
79.	Eamonn	McNanee	
80.	Edward	Christie	
81.	Éilis	NíChearnaigh	
82.	Elaine	Mulhern	
83.	Elizabeth	Higgins	
84.	Elliott	Reilly	
85.	Emma	O'Riain	
86.	Environmental Protection Agency		
87.	Eoin	Roche	
88.	Evan	Comerford	
89.	Fergal	Roche	
90.	Fergal	McSharry	
91.	Fiach	MacAindriú	
92.	Fingal County Council		
93.	Fionn	Andrews	
94.	Fionntan	MacGib	
95.	Fran	Lee	
96.	Frank	O'Connell	
97.	Gabrielle	Dunne	
98.	Garry	Dorgan	
99.	Gemma	Sexton	
100.	George	Robertson	
101.	Ger	Farrelly	
102.	Ger	Gorman	
103.	Geraldine	Kelly	
104.	Geraldine	O'Neill	
105.	Gerry	Black	
106.	Gillian	Fox	
107.	Gordon	Stirling	
108.	Grace	Wilson	
109.	Graham	Robertson	
110.	Greg	Flanagan	
111.	Helen	O'Reilly	
112.	James	Burke	
113.	Jim	Mulcahy	
114.	Jim	O'Reilly	
115.	Jim	Rock	
116.	Joan	Smith	
117.	Joanna	Lynch	
118.	John	Clinton	

119.	John	Hogg	
120.	John	Leonard	
121.	John	MacAindriu	
122.	John	Moore	
123.	John	O'Reilly	
124.	John	Small	
125.	Jonathan	Rock	
126.	Josh	Hogan	
127.	Judy	Harford	
128.	Juliana	Adelman	
129.	Karl	Connolly	
130.	Katrina	Crosbie	
131.	Kellie	Capper	
132.	Kevin	Darcy	
133.	Kevin	Leahy	
134.	Kevin	Noonan	
135.	Kieran	O'Flynn	
136.	Kieron	McDonnell	
137.	Lauren	Au	
138.	Laurence	Tighe	
139.	Leon	Young	
140.	Lesley	Martin	
141.	Leslie	Kane	
142.	Liam	Ashton	
143.	Liam	Hogan	
144.	Liam	O'Donovan	
145.	Liam	O'Reilly	
146.	LIDL Ireland		Tony Bamford Planning
147.	Linda	Parnell	
148.	Lisa	Murphy	
149.	Liz	Herbert	
150.	Lorraine	Cullen	Residents of Termon Court
151.	Lorraine	Horrigan	
152.	Margaret	Hopkins	
153.	Margaret	Tunney	
154.	Maria	Fox	
155.	Marion	O'Reilly	
156.	Mark	McDonnell	
157.	Mark	Taite	
158.	Martin	Gilligan	
159.	Michael	Maher	



160.	Martin	Matthews	
161.	Martin	Moore	
162.	Martin	Reardon	
163.	Martina	Burgess	
164.	Mary	Cosgrove	
165.	Mary	Noonan	
166.	Martin	Drury	
167.	Mike	Harvey	
168.	Miriam	Noonan	
169.	Musgrave Limited		BMA Planning
170.	Naíonra Glór na nGael		
171.	National Transport Authority		
172.	Niamh	Lawlor	
173.	Noel	Whelan	
174.	Odran	Reid	DIT Bolton Street
175.	Orna	Heuston	
176.	Owen	Richardson	
177.	Paddy	Small	
178.	Pat	Brenna	
179.	Pat	Kenny	
180.	Pat	Mannion	
181.	Patrick	Flanagan	
182.	Paul	Hayes	Ballymun Sinn Féin Cumann
183.	Paul	Ryan	
184.	Paula	Kenny	
185.	Peter	Kelly	
186.	Philip	Nolan	
187.	Philly	McMahon	
188.	Philomena	Wood	
189.	Residents of Termon Court		
190.	Robert	Byrne	
191.	Rose	Cullen	
192.	Rose	Murphy	
193.	Ruth	Brant	Ballymun Job Centre
194.	Sabrina	Furman	
195.	Sandyhill/Balbutcher Community Garden Project		Stephen Hayden
196.	Sara	Murphy	
197.	Sarah	Boyle	
198.	Seamus	Hogan	
199.	Seamus	McMahon	
200.	Seán	Brennan	

201.	Sean	Currie	
202.	Sean	Moore	
203.	Sean	Power	
204.	Sharon	Lawlor	
205.	Shay	Bannon	
206.	Simon	Lawlor	
207.	Sinead	Andrews	
208.	Sinead	Moloney	
209.	Sinéad	Nic An Ultaigh	
210.	Sinéad	Robertson	
211.	Sinn Fein		McCabe Quigley Cumann
212.	Stephen	Kelly	
213.	St. Margaret's Travellers Community		Damien Smyth
214.	Susan	Nolan	
215.	Suzanne	Kelly	
216.	Suzanne	Stone	
217.	Tara	Robertson	
218.	Three Bridges Boxing Club		Ann McDonagh
219.	Thomas F.	Quinn	Poppintree Neighbourhood Centre
220.	Transport Infrastructure Ireland		
221.	Tom	Noonan	
222.	Val	Andrews	
223.	Vincent	McAree	
224.	Vinny	Kelly	
225.	Warren	Whitney	
226.	Wendy	Dowling	

## **7 Appendix 2: Summary of the issues received from individual submissions/observations**

### **No. 1 Aidan Crosbie**

Submission states that there is a sufficient level of social housing built in the area to date. Proposes community gardening/allotments or landscaping of the hill surrounding Termon Court in lieu of a wrap around housing scheme.

### **No. 2 Aideen Grattan**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility closer to Ballymun to bring the club home.

### **No. 3 Aisling Nolan**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

### **No. 4 Aisling Noonan**

Submission is supportive of Ballymun Kickhams submission to Draft LAP and have the club located as near as possible to their community.

### **No. 5 Alan Boyle**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer Ballymun to bring the club home.

### **No. 6 Alan George**

Submission is supportive of Ballymun Kickhams request for land closer to Ballymun centre to bring the club home.

### **No. 7 Alan Hubbard**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer Ballymun to bring the club home.

### **No. 8 Alan O'Reilly**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer Ballymun to bring the club home.

### **No. 9 Amanda Delaney**

Submission is requesting to be housed in Ballymun as current housing is unsuitable.

### **No. 10 Amanda Dunne**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer Ballymun to bring the club home.

**No. 11 Andrew McManus**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer Ballymun to bring the club home. Would be of benefit for the club, area and community to have a prominent club located in the heart of its catchment area.

**No. 12 Ann Marie Murray**

Submission is supportive of Ballymun Kickhams moving nearer to Ballymun.

**No. 13 Ann Wood**

Submission states that there is a need for industry and housing of mixed types for rental and purchase.

**No. 14 Anthony Rock**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer Ballymun to bring the club home. The current facilities are outdated and too far away from Ballymun – too dangerous for young children to get to.

**No. 15 Antoinette Reilly**

Opposed to proposed development close to Linnbhla block of Santry Cross development in terms of privacy of the existing balconies. Proposed development will block views and make the Santry Cross development feel closed-in. Concern regarding vandalism and anti-social behaviour of new development right beside Santry Cross (who's management company is still paying for private security).

**No. 16 Aoife Moore**

Submission is supportive of Ballymun Kickhams submission to Draft LAP. Supportive of bringing club back to where they belong, in Ballymun itself and in the interest of children's safety, promotion of healthy lifestyles and community spirit.

**No. 17 Ballymun for Business, B4B (Robert Murphy, Chairperson)**

Submission raised a number of issues: -

*Vacant Sites*

- Vacant sites offer a key opportunity to address the shortfall in student accommodation which also adds economic and social value to Ballymun.

*M50 Lands*

- M50 lands should be retained for commercial use
- Suggests actively market, selling, targeting and promoting this land
- Showcase Ballymun as an advantageous location for large companies to locate business
- Link new businesses with local workforce agency to create local employment
- Involve B4B in the economic studies for these lands

*Main Street*

- Create a vibrant Main Street and Neighbourhood Centres
- Existing retail business should be enhanced and complement new businesses coming into town

- Attract more cafes/pubs/hotels/professional services will create jobs and enhance place making
- Alternative uses of the neighbourhood centre units should be considered
- Shopping Centre should be demolished as soon as possible to continue economic regeneration – it is a blemish on streetscape
- General parking for visitors and customers to the town; not just within building requirements

#### *Industrial Estates*

- Retention, augmentation and modernisation of existing industrial estates to attract more investment

#### *Sporting / Recreation Uses*

- Relocating Ballymun Kickhams to the centre of Ballymun would be beneficial for the town. Any redevelopment should be multi-use, with extra sporting uses and opening hours to serve entire community
- Improving amenities or young people, particularly out of hours, weekends etc, can help combat anti-social behaviour
- Amenities such as skate parks, basketball courts can help create 'places' for locals

#### *Metro North & Transport*

- Major opportunity for Ballymun
- Concerns about a train line creating a divide up the middle of Main Street
- DCC should ensure Ballymun gets the best deal during the planning process of Metro North.
- Fees / contributions for Metro North should be abolished
- Direct bus link between Airport, Ballymun and DCU would be advantageous and improve connectivity

#### **No. 18: Ballymun Kickhams (Dermot McMahon, secretary)**

Submission states that the club are looking to work with the City Council to develop a parcel of land in Ballymun which they can call home. The club is proposing to acquire Site 31 (7.7ha/19 acres), as it is the only parcel of land that is sufficiently large enough to accommodate the club's requirements and will allow the wind-down and disposal of the existing site at Collinstown Lane.

The proposed GAA centre will include the following components: -

- Fully enclosed and secure site
- Hard surface car park with lighting
- Full size, floodlit and enclosed (with low level fencing) grass GAA pitch
- Full-size, floodlit and enclosed (with low level fencing) all-weather GAA pitch
- Full-size and enclosed (with low level fencing) grass GAA pitch
- Netting (for stopping balls) around the pitches and behind the goals.
- Clubhouse – to include minimum 6 dressing rooms, equipment room, referees' room, meeting rooms, gym, physio room, shop, sports hall (suitable for basketball, badminton etc).

The submission states that the club do not wish to operate a bar within its pavilion.

The club state that the design of the new facility will be agreed with DCC and that DCC would then fund and manage the development of the facility. The submission states that

the club will play their part in fundraising and leveraging the value of their lands in Collinstown Lane.

The submission states that they would encourage local schools to play their school matches in the facility (free of charge) and that the facility would be available for weekday use for the local community groups.

#### **No. 19 Ballymun Tidy Towns Committee (Suzanne Stone)**

Committee commends the LAP and supports the proposals to protect the plaza and Main Street if the proposed Metro North goes ahead. The submission includes the following suggestions: -

- Landscaping of new developments to include plants and trees that support the biodiversity plan for Ballymun particularly pollinator friendly plants.
- Prioritise the demolition of old and vacant buildings including the shopping centre, the old health centre and the Garda station.
- Continue to support for the Ballymun4Business group who are working to improve the economy but who are also a great support to the work of the Tidy Towns Committee
- Continued support for environmental groups; the Rediscovery Centre, GAP Ballymun and axis to promote Ballymun as an area for outsiders to visit, and to continue the great work in environmental issues and promotion of the arts in the area.
- Include sufficient litter bins in new developments to support litter control - one of the key areas of work of the Tidy Towns committee
- Provision of additional litter bins and cigarette bins at bus stops and outside all shops throughout the area which have been identified as litter black spots by the committee. Supervalu on Main Street, the Travelodge hotel, axis and Poppintree Parade are examples of such black spots.
- Tidy up vacant sites until development goes ahead, for example area around Silverstream nursing home on Main Street
- Inclusion of 'soft' bicycle lanes on roads in the area and in new developments.
- Support where possible the extension of the Dublin Bike scheme to Ballymun Town Centre.
- Continued support for the community gardens in the area.
- Continued support for events in local parks such as the park run in Poppintree Park.
- Support Ballymun Kickhams and other sports groups to secure training grounds within the area as the current grounds are disconnected from the local area.
- Continued support for Safer Ballymun to tackle anti social behaviour in the area particularly the shops at Poppintree Parade and the park.
- Continued support around tackling illegal dumping, e.g. pilot mobile CCTV unit.
- Improved planting in existing residential areas to improve areas and create a sense of pride in the area.

#### **No. 20 Barbara Drumm**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer Ballymun to bring the club home.

#### **No. 21: Bernadette Roche O'Sullivan**

Submission is supportive of the move of Ballymun Kickhams pitch to the centre of the community and states that it should be in the community making it accessible to all.

**No. 22: Bernie Smith**

Submission does not support the housing plans for Termon Court as it is the only green area they have.

**No. 23: Brenda Crawford**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer Ballymun to bring the club home.

**No. 24: Mr. & Mrs. B Morgan**

Submission does not support the proposed development of apartment buildings in the green space adjacent to Termon Court. The submission is concerned about loss of privacy, loss of light, inconvenience, noise pollution during construction, impact on property values, anti-social behaviour, the use of the Court for over-flow car parking and eroding community spirit in the area. Queries who will be housed in these units and the impact the development would have on the already over-stretched social infrastructure. Objects to the development on the grounds that there has been no public consultation.

**No. 25: Brian Ashton**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer Ballymun to bring the club back where it belongs.

**No. 26: Brian Burgess**

Submission is supportive of Ballymun Kickhams request for land closer to Ballymun centre to bring the club home.

**No. 27: Brian Moore**

Submission is supportive of Ballymun Kickhams request for land to build a facility in the heart of its base and in the heart of it support. Considers that the current location is "out in the country", does not suit anyone at present and is not close to the club's roots.

**No. 28: Brian Noonan**

Submission is supportive of Ballymun Kickhams's submission to Draft LAP. It is important that this club is located as near as possible to their community.

**No. 29: Brian Rooney**

Submission is supportive of Ballymun Kickhams request for new grounds as their current facility is only accessible by car and it is not suitable for children to travel on foot and is stopping children from joining the club.

**No. 30: Carl**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility closer to Ballymun to bring the club home.

**No. 31: Carmel Andrews**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 32: Cathal Roche**

Submission is supportive of Ballymun Kickhams efforts to build a facility nearer their Ballymun heartland.

**No. 33: Catherine Small**

Submission is supportive of Ballymun Kickhams's submission to the LAP.

**No. 34: Cathy Rock**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 35: Cecily Leonard**

Submission is supportive of Ballymun Kickhams quest to attain land to build new premises nearer to Ballymun to bring the club home.

**No. 36: Cian Andrews**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 37: Cian Gerrard**

No text in submission.

**No. 38: Ciara Byrne**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 39: Ciara Kelly**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun.

**No. 40: Ciaran Dunne**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 41: Ciaran Paul Roche**

Submission is supportive of Ballymun Kickhams submission to Draft LAP and is supportive of bringing the soul of the club back to the heart of Ballymun for the community and the club.

**No. 42: Ciaran Staunton**



Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home. It would benefit the community allowing players to access the pitch easier.

**No. 43: Claire Quinn**

Submission is in relation to Site 25 (Parkview). The original aspirations of the plan need to be achieved, particularly with regard to economic development and social regeneration. Disappointed to see the imbalance of social housing in this area, when compared to neighbouring areas. It is crucial that Parkview development is earmarked for private residential and affordable housing to further social progress in the area and in encouraging private homeowners to remain.

**No. 44: Claire**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 45: Cliona**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 46: Cllr Noeleen Reilly (Councillor and resident)**

Submission is grouped under the following headings: -

*Site Briefs*

- Council should develop the bigger sites first, particularly those around the town centre; to have the effect of regenerating the town centre;
- Over concentration of apartments should be avoided; much of the anti-social behaviour in Ballymun exists within apartment blocks;
- Families in the area looking to buy want houses and not apartments
- Some sites identified for housing are possibly too small, e.g. site at Termon Court. We should not be knocking housing to build apartments, site is too small for building, new units will be right on top of the road and this should be avoided
- Obvious housing sites are not identified; land besides co-operative housing should be extended. This area would not be a great place for a park and would attract anti-social behaviour. There is an issue of dumping on this site – housing would improve this.
- Shangan site could support senior citizen housing and co-operative housing
- Sites no. 20 & 21 are very small for development. Site no. 21 has not been maintained by the Council; environment improvements are required here.

*Sports & Recreation*

- Shortage of facilities in the area for sports club
- Council should cater for Ballymun Kickhams moving closer to Ballymun and need to provide additional pitches for Setanta GAA
- Need to look at the expansion of Setanta as much more takes place here than just hurling.
- There is land at the rear of the old Trinity Comprehensive which could be used.

- Need to address shortage of facilities for people who wish to learn to dance in the area

#### *Tenure Diversity*

- Tenure diversity strategy has not worked
- Rent bans are not understood in the area; contributing to population decrease & sense of discrimination
- Sites should be looked at a case by case basis as some sites can cater for more than 10% required by Part V

#### **No. 47: Colin Moore**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility closer to Ballymun which will be of great benefit to the Ballymun community.

#### **No. 48: Concepta Dalton**

Submission is supportive of Ballymun Kickhams quest to build a facility nearer to Ballymun.

#### **No. 49: Conor Byrne**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

#### **No. 50: Conor Noonan**

Submission is supportive of Ballymun Kickhams's submission to Draft LAP. It is important that this club is located as near as possible to their community.

#### **No. 51: Cora Herbert**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

#### **No. 52: Cora Vizzard**

Submission is supportive of Ballymun Kickhams's submission to the LAP. It is a club that has done huge work for the children of Ballymun / Glasnevin. It has generated a positive image of the area and its people.

#### **No. 53: Cumann Báire Setanta (Tommy Gibson, P.R.O)**

Submission states their interest in a shared use of any facility, i.e. an all weather sports pitch, which may be developed as part it. Also expresses their interest, along with any other club/group that may use that facility, in being part of the management committee of that facility.

#### **No. 54: Cuman Báire Setanta (Liam Ó Briain Secretary)**

Submission is from Cuman Baire Setanta, hurling and camogie club in Ballymun who also promote engagement in the Irish language and culture. They request a communal all weather floodlit arena in line with Section 3.5.5, Part 3 of the Draft LAP for use by all

sports groups and schools from the area. This communal facility should be based in the heart of Ballymun. The Balbutcher site beside the Holy Spirit school is considered to be an ideal location. An all weather pitch would provide more versatility. The Alfie Byrne Park is cited as an example in the submission.

**No. 55: Daire Andrews**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 56: Daragh McArdle**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 57: David Coyle**

Submission relates to the proposed development opposite the Linnbhla block of Santry Cross. Concerned that the new block would block sun in the existing communal area, create a dark and enclosed space and would reduce the value of the existing apartments and amenities. The density of the apartments in Santry Cross is already higher than other parts of Ballymun and this will only make the situation worse.

**No. 58: David Lynch**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 59: David Quinlivan**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 60: Deborah McLoughlin**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 61: Declan Bolger**

Submission requests that the club is moved back to Ballymun.

**No. 62: Declan Cody**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 63: Declan Kilmartin**

Submission is supportive of Ballymun Kickhams proposal to relocate their pitches and clubhouse nearer their catchment area. This will facilitate the juvenile section, enhancing the safety for children travelling to training and matches.

**No. 64: Declan O'Brien**

Submission is supportive of Ballymun Kickhams in their pursuit for a new facility in the Ballymun area.

**No. 65: Declan Small**

Submission is supportive of Ballymun Kickhams quest for The Naul lands to bring the club home.

**No. 66: Deirdre Adamson**

Submission is supportive of Ballymun Kickhams quest land they request for the younger generation. The current site is too dangerous for kids to get too. If the club was more centrally located kids could make their own way there.

**No. 67: Deirdre Byrne**

Submission is supportive of Ballymun Kickhams's submission to Draft LAP. In support of the club building a facility near to Ballymun/Glasnevin as it will be beneficial to the local community.

**No. 68: Department of Education and Skills**

Submission states that it is important that there is sufficient educational infrastructure to meet the needs for the community. The Department requests that where possible site reservations are made close as possible to community facilities such as sports facilities, libraries etc, so that these can be shared between the school and community. The Dept is also open to concept of multi-campus school arrangements, to reduce the land take for school development. The educational zoned lands should be placed beside open space or green belt zonings if possible to allow ready access to these amenities and other aligned facilities to future proof possible future expansion.

The submission requests the Council consider a policy of introducing a buffer zone around existing school sites, where possible to facilitate adequate separation from housing while allowing reasonable scope for increased school heights in established neighbourhoods.

For school purposes, Ballymun area is located in the 'Finglas East\_Ballymun Dublin 1'" school planning area, as designated by the Dept. The area is current served by 9 primary and 1 post-primary schools.

**No. 69: Department of Housing, Planning, Community and Local Government**

The Department considers that the Ballymun Draft Local Area Plan 2017-2023 provides a comprehensive framework for the continued development and regeneration of this important part of Dublin City and in particular, for the planned future growth of new housing and employment development in tandem with the necessary supporting community and physical infrastructure.

The Local Area Plan (LAP) details the strong leadership of the City Council in the acquisition of the Ballymun shopping centre and the proactive efforts to develop this and other development sites as a focus for the regeneration strategy for Ballymun.

The submission considers that the LAP would benefit from a schedule/table of the potential housing sites with an estimate of housing yield as this would assist in the monitoring of LAP implementation and the planned new housing delivery.

The submission considers the site design guide provided in Chapter 6 to be useful in assisting the design of development proposals/projects for the individual sites identified.

In terms of the sites outside the LAP boundary (sites 26-31) which are owned by the City Council, the Department does not consider it appropriate for these lands to be included in the Ballymun LAP as it does not extend to the adjoining jurisdiction, and a joint LAP as provided for under S. 18(2) of the Planning & Development Act, 2000 is not being undertaken. The Council is requested to remove the current format/detail for these sites in the documentation as appropriate in order to avoid any potential ambiguity in their status as outside the Dublin City Council area

**No. 70: Dermot King**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 71: Dermot Leahy**

Submission is supportive of Ballymun Kickhams's submission to Draft LAP. In support of their request to obtain land to develop pitches and other facilities.

**No. 72: Des Nolan**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 73: Dillion Keating**

Requests Ballymun Kickhams to be given a new clubhouse.

**No. 74: Dolores McKenna**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 75: Donal Noonan**

Submission is supportive of Ballymun Kickhams's submission to Draft LAP. It is important that the club is located near to the community.

**No. 76: Donna Barry**

Submission is opposed to the proposed building to the south of Linnbhla, Santry Cross. Questions the removal of the green space and attraction of additional people into an area that existing unresolved problems.

**No. 77: Dublin Airport Authority**

The submission from the Dublin Airport Authority acknowledges Policy SI25 of the Dublin City Development Plan 2016-2022 regarding air and noise quality. The submission notes that the most northerly part of Electoral Division (Ballymun A) falls within the 'Outer Airport Noise Zone', and requests that the LAP includes an acknowledgement that any further proposals for noise sensitive uses falling within the outer airport noise zone will be subject to noise assessment and insulation, to ensure appropriate internal noise levels can be achieved.

**No. 78: Eamonn Donnelly**

Submission is supportive of Ballymun Kickhams's initiative to bring its pitch and facilities closer to Ballymun.

**No. 79: Eamonn McNanee**

Submission is supportive of Ballymun Kickhams's submission to Draft LAP. Support of their aim to get land closer to Ballymun.

**No. 80: Edward Christie**

Submission is supportive of Ballymun Kickhams's submission to Draft LAP. Support of their aim to attain land closer to Ballymun. The current clubhouse is too great a distance away and has a negative effect on members, particularly children.

**No. 81: Éilis Ní Chearnaigh**

Submission requests a communal floodlight sports arena.

**No. 82: Elaine Mulhern**

Submission requests that the height for site 10 is not higher than the existing housing in Santry. Residents in Oldtown Road and Avenue need to be involved in the design prior to public consultation. Submission provides a number of suggestions for the area: -

- Create a dog run area, with proper gate, railings and poo bin.
- Drop in recycling centre, to prevent dumping of household items, manned by DCC staff (this would bring waste to the bigger centre on Collins Avenue)
- Recycling workshops with local residents to educate them and entice them to recycle more by offering money off their refuse bill each month

**No. 83: Elizabeth Higgins**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 84: Elliot Reilly**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 85: Emma O'Riain**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun.

**No. 86: Environmental Protection Agency**

The submission acknowledges the environmental related objectives within the Draft Plan including the provision/ protection of green infrastructure and biodiversity and the need to improve surface water drainage. It welcomes the undertaking of the bat survey and the need to improve access to, and use of, public transport as a means of minimising greenhouse gas emissions. The alternatives described in the SEA are noted.

The submission makes a number of specific comments/ recommendations:

- There is merit in describing in greater detail how environmental related issues such as noise and air quality issues will be mitigated / addressed.
- It would be useful to consider including an environmental summary section in the Plan, which highlights how the key environmental issues have been taken into account.
- The Plan should consider including a commitment to integrate the relevant recommendations of the National Mitigation Plan, Climate Change Adaptation Framework and any local climate change adaptation strategies that may be adopted over the lifetime of the Plan, as appropriate.
- With regard to the SEA, it is suggested that there is a commitment to taking into account the relevant recommendations of the national Draft River Basin Management Plan, upon its adoption.
- Also with regard to the SEA it would be useful to consider describing whether any alien invasive species have been identified in the plan area.

The submission highlights the next steps in the process, including the need to screen for likely significant effects where amendments are proposed, and the production of the SEA Statement following adoption of the Plan.

**No. 87: Eoin Roche**

Submission states that the club struggles to attract new young members due to its location.

**No. 88: Evan Comerford**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun.

**No. 89: Fergal Roche**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun.

**No. 90: Fergal McSharry**

Submission is supportive of Ballymun Kickhams quest to attain land in the vicinity of Ballymun village.

**No. 91: Fiach Mac Aindriú**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun.

**No. 92: Fingal County Council**

The submission from Fingal County Council welcomes and supports the Draft LAP and in particular the vision and objectives set for the “M50” lands. It recognises and supports the important economic role of the M50 lands and is committed to working with DCC on the consolidation of these key economic lands in proximity to the proposed Metro North route, including the provision of a link under the R108 to link these lands with the future Metro stop:

*“The ‘M50’ Lands’ are zoned for high density mixed use development within the Fingal Development Plan 2017-2033 and the Dublin City Development Plan 2016-2022. These zoning objectives are based in part on the anticipated delivery of Metro North through Ballymun, which will serve these lands. It is an objective of Fingal Development Plan to link the Ballymun M50 lands directly with the future Metro stop, via a link under the R108 and this infrastructural requirement is acknowledged within the Draft Ballymun LAP... The Draft LAP notes that the extent of vacant lands along the Metro route in public ownership provides the opportunity to deliver suitable high density schemes along the Metro line, which will encourage sustainable travel patterns in the city... Fingal will work with DCC and the NTA to ensure the provision of a high quality transport system along this route.”*

Fingal County Council support the vision for site Nos. 26, 27, 28, 29 and 31, located within the Fingal Co. Co. administrative area, and notes that there is no conflict between the proposed land uses illustrated in the Draft LAP and Fingal's designated land use zoning objectives.

**No. 93: Fionn Andrews**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun.

**No. 94: Fionntan MacGib**

Submission requests a communal floodlight sports arena.

**No. 95: Fran Lee**

Submission requests land for Ballymun Kickhams to relocate closer in the Ballymun community.

**No. 96: Frank O'Connell**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun.

**No. 97: Gabrielle Dunne**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 98: Garry Dorgan**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 99: Gemma Sexton**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 100: George Robertson**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.



**No. 101: Ger Farrelly**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 102: Ger Gorman**

Submission requests something like a skate park like the one in Blanchardstown Millenium Park.

**No. 103: Geraldine Kelly**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun.

**No. 104: Geraldine O'Neill**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 105: Gerry Black**

Submission is supportive of moving Ballymun Kickhams back closer to Ballymun.

**No. 106: Gillian Fox**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 107: Gordon Stirling**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 108: Grace Wilson**

Submission is supportive of Ballymun Kickhams's submission to the Draft LAP.

**No. 109: Graham Robertson**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 110: Greg Flanagan**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun.

**No. 111: Helen O'Reilly**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 112: James Burke**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 113: Jim Mulcahy**

Submission is supportive of Ballymun Kickhams's submission to acquire the Naul Lands.

**No. 114: Jim O'Reilly**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun.

**No. 115: Jim Rock**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 116: Joan Smith**

Submission is supportive of Ballymun Kickhams' application to relocate to the lands in front of Musgraves on the Ballymun Rd.

**No. 117: Joanna Lynch**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 118: John Clinton**

Submission is supportive of Ballymun Kickhams' submission to Ballymun LAP.

**No. 119: John Hogg**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 120: John Leonard**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 121: John Mac Aindriu**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 122: John Moore**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun.

**No. 123: John O'Reilly**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 124: John Small**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun with the preferred option of attaining The Naul lands.

**No. 125: Jonathan Rock**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun.

**No. 126: Josh Hogan**

Submission is not supportive of the proposed building in front of Linnbhla, Santry Cross. Submission states this would block the views from the balconies and make the development feel very closed in.

**No. 127: Judy Harford**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 128: Juliana Adelman**

Submission is supportive of Ballymun Kickhams quest to obtain land closer to Ballymun.

**No. 129: Karl Connolly**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun.

**No. 130: Katrina Crosbie**

Submission is in relation to Site 19. Submission is opposed to the demolition of the northern dwellings and construction of three storey homes at the top of the court, as it will decrease the value of the existing houses and increase anti-social behaviour. Submission is in favour of building single storey homes for the elderly with access remaining for people to get to the church and the school. Concern that the proposal will cause drainage and traffic issues.

**No. 131: Kellie Capper**

Submission is supportive of bringing Ballymun Kickhams home.

**No. 132: Kevin Darcy**

Submission is supportive of bringing Ballymun Kickhams home.

**No. 133: Kevin Leahy**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 134: Kevin Noonan**

Submission is supportive of Ballymun Kickhams's submission to Draft LAP.

**No. 135: Kieran O'Flynn**

Submission is supportive of Ballymun Kickhams's submission to Draft LAP to bring their facilities closer to Ballymun.

**No. 136: Kieron McDonnell**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 137: Lauren Au**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 138: Laurence Tighe**

Submission requests land in the heart of Ballymun for Ballymun Kickhams.

**No. 139: Leon Young**

Submission is supportive of Ballymun Kickhams quest to attain land in the Ballymun area. Current location is too dangerous for young children.

**No. 140: Lesley Martin**

No text submitted.

**No. 141: Leslie Kane**

Submission is in relation to the site briefs: -

- Site 12: Requests housing on this site, as currently being used as dumping ground
- Site 14: Requests housing, maybe for a co-operative and mixed with a green area as site is large.
- Site 21: Requests housing, due to anti-social behaviour.
- Site 22/23: Requests housing.
- Site 20: Requests car parking on this site for Poppintree NC.

**No. 142: Liam Ashton**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 143: Liam Hogan**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 144: Liam O'Donovan**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 145: Liam O'Reilly**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun.

**No. 146: LIDL Ireland (Tony Bamford Planning)**

Submission is in relation to Site 3, acquired by LIDL and relates to two items: -

*Parking Standards for Food Retail*

The submission sets out a planning argument for a specific (increased) parking standard for the supermarket/discount store on site 3: -

- Maximise claw-back of convenience spending leakage
- High parking levels in surrounding food retailers that are drawing spending away from the centre of Ballymun (ALDI on Santry Avenue have 1:10 sq.m parking ratio, and ample parking at Charlestown and Omni Centres)
- Notes car parking flexibility for regeneration areas contained within Dublin City Development Plan 2016-2022
- Car parking standards in Fingal County Council; 1:20 sq. m for foodstores (including discount stores)

The submission proposes a specific objective of 1 car parking space per 18 sq.m. to be applied to any supermarket proposal on site 3.

*Retail Capacity*

Submission raises concern that the retail figures set out in the Retail Study could be viewed as 'caps', irrespective of their intention as 'direction fingers' or guides by planning decision makers. Concern that the low and high capacity scenario figures do not provide much room for wider retail development and may prejudice potential investment in the core of Ballymun.

The submission proposes that a specific objective for the prioritisation of a mid-sized supermarket to help claw back convenience spending leakage is attached to site 3.

**No. 147: Linda Parnell**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 148: Lisa Murphy**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 149: Liz Herbert**

Submission is in relation to Site 19 and is not in supportive of housing on this site. The submission notes that this area does attract anti-social behaviour ("the hill"), but housing is not the right choice. The submission considers a community garden or a landscaping to

be more appropriate. Additional housing will increase the anti-social behaviour, traffic and drainage issues and will reduce property values.

**No. 150: Lorraine Cullen (on behalf of the residents of Termon Court)**

Submission is opposed to the adjoining Termon Court development due to drainage issues and also over-crowding which has led to anti-social behaviour that has gotten out of control. Requests additional social amenities such as community gardens, allotments, crèches etc.

**No. 151: Lorraine Horrigan**

Submission is supportive of Ballymun Kickhams's submission to the Draft LAP.

**No. 152: Margaret Hopkins**

No text submitted.

**No. 153: Margaret Tunney**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun.

**No. 154: Maria Fox**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 155: Marion O'Reilly**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to build a facility that is more accessible to local people.

**No. 156: Mark McDonnell**

Submission considers Ballymun and its surrounding area has great potential due to its proximity to Dublin city centre, DCU, the airport and the proposed development of Metro North. States that there is potential to develop land as a high end business park, similar to those in Sandyford/Dundum etc, which will bring jobs to the area and attract a greter mix of residents.

There is also potential to deliver a student hub/village to cater for DCU, DIT, and Trinity students.

Potential also exists to develop more direct cycle lanes between Ballymun and the city centre to encourage more people to cycle.

Plans like the above, might attract private housing developers and more business / retail to the town centre.

**No. 157: Mark Taite**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 158: Martin Gilligan**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 159: Michael Maher**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 160: Martin Matthews**

Submission is requesting land allocation for an urban farm, for organic fruit and vegetables, c. one quarter of an acre, for a business venture. .

**No. 161: Martin Moore**

Submission is supportive of Ballymun Kickhams quest to attain the Naul land in Ballymun.

**No. 162: Martin Reardon**

Submission requests an all weather floodlight arena which should be a communal facility to be utilised by all sports groups and schools from the area. Ideally the council should keep full control of this and not have one anchor tenant.

**No. 163: Martina Burgess**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 164: Mary Cosgrove**

Submission is supportive of Ballymun Kickhams's on their local plan.

**No. 165: Mary Noonan**

Submission raises a number of different issues, set out below: -

- Support for Poppintree Park which should be replicated in many areas of the north side and Dublin.
- Concern regarding the proposed disposal of green spaces. While they may be subject to anti-social behaviour and illegal dumping issues, they should be utilised for environmental awareness and not property development.
- No provision for community engagement via provision of community gardens/spaces, seating areas, allotments, biodiversity sites. The two existing sites appear to be on temporary basis
- Ballymun has a high dependency on medication, drugs alcohol and mental/physical issues. Queries how many fast food premises, off licences and alcohol suppliers exist in the area in comparison to affordable quality food, vegetable outlets
- Requests to keep Ballymun's natural green and nature facilities
- Would welcome improvements to the courtyards
- Sub-standard road conditions due to heavy goods vehicle using the area as a rat-run
- Requests community engagement through provision of adequate and quality shopping facilities, transport, vibrant and safe environment before any further development can take place

*Site no. 19*

- Queries what impact demolition of house nos. 18-19 Termon Court would have on houses 6-12
- Realignment of Balbutcher Lane North will result in Termon Court being totally surrounded and give rise to an increase in traffic, noise/environmental pollution and safety risk to young and old
- Site B: Pending transfer of the lands these units will be totally isolated and vulnerable surrounded by busy roads
- Site C: New housing units do not create new safe residential streets, particularly with a new realigned road which shall increase the flow of traffic

*Sites 11 – 25 (inclusive, other than No. 19 above)*

- Queries whether all of the proposed residential developments on these sites should proceed
- Questions the impact on existing community and social infrastructure
- Inadequate water/sewerage infrastructure
- Severe shortage of amenities for older members of the community
- Sub-standard bus service

*Expired Planning Permissions*

- Some of the sites identified had previous planning permissions granted, subsequent expired and there is a significant increase in the numbers of proposed residential units (e.g. 3337/07 – 61 units; LAP states 110-140 units)

**No. 166: Martin Drury**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 167: Mike Harvey**

Submission states Dublin needs high-rise development and Ballymun is the perfect location of a high density and mixed use development. 12-24 stories should be sought to ease the current housing crisis and help attract foreign investment.

**No. 168: Miriam Noonan**

Submission is supportive of Ballymun Kickhams's submission to Draft LAP and bring the club as near as possible to their community.

**No. 169: Musgrave Limited (submitted by BMA Planning)**

Submission is on behalf of Musgrave Limited, who is represented in the following retail stores in Ballymun: -

- (a) Murphy's SuperValu, Main Street, Ballymun
- (b) Quinn's Centra, Poppintree Road,
- (c) Murphy's Centra, Shangan Road
- (d) Quinn's Centra, Sillogue Road



The Musgrave Market Place outlet and headquarters building is located off Balbutcher Lane providing wholesale services for retailers in the wider area as well as employment within Ballymun. Musgrave is therefore a key stakeholder in the future development of Ballymun. The submission relates to the site briefs: -

#### *Sites 1 and 2, Main Street*

Submission welcomes the proposal for high density mixed use development on these sites and the associated requirements for public realm improvements and road upgrades on Gateway Crescent, Sillogue Road and the Sillogue Link Road, to generate further activity on Main Street.

Sites 1 and 2 should be the “retail core” within Ballymun and the starting point for any sequential test within the LAP area. New comparison and convenience retail development should be directed to these sites in the first instance.

#### *Site 26, M50 Lands*

Musgraves have a concern about the potential for inappropriate retail development on the “M50 Lands”. The Draft LAP for this site indicates “big box” type retail warehousing within the site indicating that the retail warehousing could potentially be developed across the entire site. The submission requests: -

- Proposals for site 26 should not prejudice the South Fingal Fringe Study, as required by Fingal County Council’s 2017-2023 Development Plan (Objective MT07)
- Any proposals for additional retail uses must be evidence based and in accordance with the principles contained in the ‘Retail Planning Guidelines for Planning Authorities, 2012’. No evidence is provided in the Draft LAP or Retail Study to support the proposals for additional retail warehousing floorspace at this location.
- Concerns that the provisions in the Draft LAP may be used to promote ‘Retail Warehouse Club’ type uses.
- RPG’s discourage retail development which relies on car borne transport on a site located adjacent to motorway network. The traffic implications of any retail development proposals close to the M50 must be considered.

#### **No. 170: Naionra Glor na nGael**

Submission states that Radharc Ceilteach, Cumann Baire Setanta, Glor na nGael and Setanta Strings wish to use Ballymun Library when it is vacated as a cultural centre for Ballymun. The Setanta Strings orchestra has had to relocate to Riverside Tennis Club due to capacity issues.

#### **No. 171: National Transport Authority, NTA**

The submission from the NTA recognises Ballymun “as a key location for development in the Dublin region. The regeneration of the existing neighbourhoods, coupled with the intensification of land uses across the plan, area, represents close integration between land use planning and transport planning and is considered to be consistent with the Transport Strategy for the Greater Dublin Area”.

The submission states that the identification of the preferred Metro alignment will be finalised by year end, 2017. Therefore the NTA is not able at this stage to confirm the level of impact with proposed development, but they are fully cognisant of the constraints, risks and context which apply to the emerging Ballymun Main Street. It is the intention of the NTA to fully engage with DCC as the scheme develops.

The submissions seeks a number of amendments to the Draft to makes reference to the following:

(i) Ballymun will benefit from the development of a core bus corridor as proposed in the NTA strategy and the recently commenced review of the city's bus services. As such the authority recommends that Objective MO3 be replaced by two objectives;

- Facilitate the delivery of a core bus corridor through Ballymun as proposed in the NTA transport strategy.
- Work with the NTA to ensure that the recommendations of the bus network review are implemented in Ballymun.

It is recommended that references to these two projects are made in the body of the LAP as appropriate.

(ii) All road schemes in the area should be undertaken in accordance with the 'Principles of Road Development' as set out in Section 5.8.3 of the NTA Transport Strategy. This is to ensure that there be no significant increase in private vehicle capacity on radial roads inside the M50. The submission requests the inclusion of an additional movement objective as follows;

- Undertake all new road schemes in accordance with the Principles of Road Development as set out in the NTA Transport Strategy.

**No. 172: Niamh Lawlor**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 173: Noel Whelan**

Submission requests that an all weather communal floodlit arena be provided for the whole community; for school and sports groups.

**No. 174: Odran Reid (Dublin Institute of Technology – Bolton Street)**

Submission makes the following points: -

*Core Area of Ballymun*

- Core of Ballymun should be ambitious and dramatic and create a sense of place that can be recognised as an urban town and not a desolate suburb
- Central place of Ballymun should be intensely developed with high quality retail, restaurants and entertainment
- Should include high quality private accommodation to change the economic profile of the area
- Central areas of Ballymun to be properly connected to the newly developed parks and recreation areas

*LAP Boundary*

- LAP should be extended to include the lands north of Ballymun and include Fingal in development of the LAP
- LAP should be linked to development of Santry Demesne to ensure coherence to the whole area and necessary infrastructure
- Should include connections to the proposed Santry River Greenway and link Ballymun to Finglas and perhaps further to the Royal Canal Greenways

*M50 Lands*

- Lands to the north of Ballymun should be developed as a SDZ to deliver community facilities, employment and residential development

#### *Cycleway*

- Proper provision for cycle ways in the LAP

#### *Key Policies required:*

- Establish Ballymun as a key location for investment
- Encourage economic development by putting a strong dynamic economic development structure
- Public realm should be of exceptional standard
- Public spaces are maintained to a very high and ongoing standard
- Address areas of commercial activity that were developed by BRL that are now a blight on the landscape

#### **No. 175: Orna Heuston**

Submission is supportive of Ballymun Kickhams proposal to obtain land nearer to Ballymun to make it more accessible.

#### **No. 176: Owen Richardson**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

#### **No. 177: Paddy Small**

Submission is supportive of Ballymun Kickhams's submission to get the Naul lands in Ballymun.

#### **No. 178: Pat Brenna**

Submission is supportive of Ballymun Kickhams's submission to obtain land nearer to the community they serve.

#### **No. 179: Pat Kenny**

Submission is supportive of Ballymun Kickhams submission to LAP to bring them closer to the community.

#### **No. 180: Pat Mannion**

Submission is supportive of Ballymun Kickhams submission to LAP to bring them home.

#### **No. 181: Patrick Flanagan**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

#### **No. 182: Paul Hayes (Ballymun Sinn Féin Cumann)**

Submission raised a number of different issues: -

#### *Trees and Grass*

- Tree stands should be fitted with weed membranes or cemented as they are an eyesore and catch rubbish and weeds
- Company responsible for installation of metal bars around tree stands should be required to repair/remove them as they are substandard, damaged and out of shape
- All grass verges are trimmed and fitted with metal mowing edging to prevent growing into footpath
- Weed eradication plan to get rid of weeds on cobble lock pavements

#### *Litter and Waste*

- City Council should put a 'litter plan' and litter awareness plan in place
- Recycling centre should be set up with closed off bottle bank
- Bin storage areas in newer houses should be closed off as they have become rubbish dumps

#### *Ballymun Centre and Retail*

- Regeneration has failed as there is no focal point once the shopping centre was removed and neighbourhood centres are not the answer (not sufficient footfall & being utilised by voluntary sector).
- Ballymun requires a focal point
- Suggests CPO's retail units at Santry Corss as they are an eyesore

#### *New Facilities*

- Specific facilities for the elderly and existing facilities designed with elderly in mind
- All weather floodlit communal facility for all sport groups and schools
- A dedicated dog park in Poppintree Park or surrounding area for dog handling and classes including vet services

#### **No. 183: Paul Ryan**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

#### **No. 184: Paula Kenny**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

#### **No. 185: Peter Kelly**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

#### **No. 186: Philip Nolan**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

#### **No. 187: Philly McMahon**

Submission stated support for Ballymun Kickhams to attain land to build a facility nearer Ballymun and Bring Ballymun Kickhams Home.

**No. 188: Philomena Wood**

Submission does not support the proposal to locate houses in the green area next to Termon Court as it is the only one they have.

**No. 189: Residents of Termon Court**

Submission is in relation to site 19: -

- Request retention of the disputed area behind railings between Termon Court and St. Joseph's school where there is a line of trees where wildlife and bats are located
- 3 storey units proposed in Block A, B and C. Request only 2 storey and similar in appearance to existing development
- Parking and quantity of housing numbers are a concern
- Plan A shows no exit out of Termon Court to Balbutcher Lane from Termon Court 13-24
- Sewage and surface water upgrade is required
- Garda consultation to design out design flaws is sought

**No. 190: Robert Byrne**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 191: Rose Cullen**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 192: Rose Murphy**

Submission is against the development at Termon Court. Considers development will remove green space for children to play and access to school and will attract anti-social behaviour. Requests that the space is landscaped and the courts are done up.

**No. 193: Ruth Brant (Ballymun Job Centre)**

Submission states existing courts are being overlooked. Previous proposals to reverse the courts were discussed years ago – can they can added to the Plan? Also requests an increase in services around safety and policing.

**No. 194: Sabrina Furman**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 195: Sandyhill/Balbutcher Community Garden Project (Stephen Hayden)**

Submission proposes a city farm in Ballymun. The proposal notes that the previous Dublin City Development Plan 2011-2017 included an objective to establish a city farm, an objective which is not contained within the current Development Plan. The submission requests that this objective is reinstated as an objective of the City Council and that the identified area in Ballymun is set aside for that development.

The benefits of a city form, as submitted, are: -

- Create a significant visitor/tourist attraction
- Provide opportunities to run educational courses and workshops, both short and long term across a number of topics from horticulture to animal husbandry
- Provide centre for a farmers market supporting artisan producers
- Could link in with third level institutions e.g. DCU, Blanchardstown IT and the National Botanic Gardens and draw those institutions in to the community
- Form part of a suite of visitor/tourist attractions in the area which would complement each other e.g. The National Botanic Gardens, Glasnevin Cemetery and the recently opened Rediscovery Centre
- Provide excellent educational resource for both primary and secondary schools in Ballymun, the surrounding areas and indeed the City and County as a whole providing a particular visitor attraction for those institutions

All of the above would translate into social and economic benefits for the area.

The submission identifies the former flat complex on Balbutcher Road as the location for this proposal, as the site is current railed all around and bounded by existing developments.

It is also noted that this committee has also submitted a separate proposal for the development of a community garden in the Sandyhill/Balbutcher Road area.

**No. 196: Sara Murphy**

Submission is supportive of Ballymun Kickhams quest to attain land in the Ballymun area.

**No. 197: Sarah Boyle**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 198: Seamus Hogan**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 199: Seamus McMahon**

Submission is supportive of Ballymun Kickhams's proposal.

**No. 200: Sean Brennan**

Submission is supportive of Ballymun Kickhams's submission to Draft LAP.

**No. 201: Sean Currie**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 202: Sean Moore**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 203: Sean Power**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun.

**No. 204: Sharon Lawlor**

No text on submission.

**No. 205: Shay Bannon**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 206: Simon Lawlor**

Submission is supportive of Ballymun Kickhams's submission to Draft LAP.

**No. 207: Sinead Andrews**

Submission is supportive of Ballymun Kickhams's submission to Draft LAP to bring the club home.

**No. 208: Sinead Moloney**

Submission is supportive of Ballymun Kickhams quest to obtain land in the Ballymun to bring the club into the centre of the community. The existing clubhouse is isolated and dangerous to get to.

**No. 209: Sinéad Nic An Ultaigh**

Submission is supportive of Ballymun Kickhams's submission to Draft LAP.

**No. 210: Sinéad Robertson**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 211: Sinn Fein (Mc Cabe Quigly Cumann)**

Submission identifies a number of different issues: -

*Gaeltacht Quarter*

- Establishment of a Gaeltacht quarter comprising Setanta GAA club, Scoil an tSeachtar Laoch and new Irish secondary non-denominational school on the 'former old boy's comprehensive school' site
- Relocate the existing public library and law services to the plaza and allow Setanta GAA to use the building and the lands

*Sports Clubs and Parks*

- Allow Naul Park (M50 lands) which is a designated park to be used solely by Ballymun Kickhams or even a mixture of clubs

- Ballymun United FC should be expanded towards Mayestown Downs (currently divided by a closed road)
- Establishment of any new parks should incorporate playgrounds ,skate parks, gym equipment etc
- LAP should redesign Shangan Park to make it more child friendly and provide a new playground

#### *Industry*

- Establishment of an Industry/commercial corridor to extend around M50 and land surrounding Poppintree and St. Margaret's Industrial Estates
- Support LAP to extend plaza to other side of the road and create village style mix of residential and retail and not a "block type" shopping centre
- Greater capacity for more retail in area

#### *Transport*

- Metro stop must be in the centre isle of Ballymun and parallel to the central plaza area

#### *Housing*

- More residential areas comprising mixed tenure and co-op housing
- Apartment sizes and houses should be similar to the regulations used in the Ballymun Regeneration: -
  - (i) 55/60 sq.m for 1 bed
  - (ii) 70/80 sq.m. for 2 bed
  - (iii) 90/98 sq.m for 4 bed
- Removal of any prohibition on access to HAP, RAS or rent supplement in Ballymun area
- Convert large numbers of vacant retail units into residential
- Repair roof of Futsal dome

#### *Infrastructure*

- Fully implement Moylan Report on drainage, included remedial works to Coultrey Gardens, Sandyhill Gardens, Shangan Gardens and Sillogue Gardens
- Install link road to Hampton Wood, this should be coupled with a public transport service for the area.
- Site no 20: Realign road, remove bend, include extra car parking spaces and relocate bus stop
- Site no 21: Residents are opposed to 3 storey buildings and opening up of the cul-de-sac on Belclare Green

#### *Ballymun Village*

- Establish a village type atmosphere with a wide mix of uses and a business plan completed to entice various types of commercial and professional services

#### *Social Enterprise*

- Sites 26-31: 1/4 up to 2 acres of land made available for an Urban Farm - Social Enterprise. A new start up business being pursued by local residents.

#### *Urban Design*

- Garda consultation at each stage of design in new builds to advise on house to avoid design flaws including anti-social behaviour



**No. 212: Stephen Kelly**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 213: St. Margaret's Travellers Community Association (Damien Smyth, Manager)**

Submission states that the proposed new Dublin City Council "super depot" is an issue of concern for local residents. Residents in the St. Margaret's Park area believe that the depot will impact negatively on their lives and do not want this development in their area. Requests that the plan should include the concerns of the residents and requests the City Council to find an alternative location for their 'super depot'.

**No. 214: Susan Nolan**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 215: Suzanne Kelly**

Submission is supportive of Ballymun Kickhams's application for land/sports near Ballymun centre. Its current location is not accessible without a car.

**No. 216: Suzanne Stone**

Is supportive of the plan and hopes all can be achieved. Suggestions/ comments as follows: -

- Anti-social behaviour around the shops at Poppintree Parade needs to be tackled; Safer Ballymun and Gardai resources are over-stretched – more localised solution is required to assist tackling the anti-social issues.
- Increase provision of litter bins in the area and in particular cigarette bins at bus stops.
- Maintenance of tree bases along Balbutcher Lane and Poppintree Parade is poor; little collecting, shrubs not trimmed and some metal surrounds are broken. Tidy Towns needs greater support from the City Council
- Approval of the 'PACE' planters and requests additional provision
- Support extension of bike lanes to the plaza or nearby. Supports Ballymun Kickhams quest to obtain land closer to Ballymun.

**No. 217: Tara Robertson**

Submission is supportive of Ballymun Kickhams quest to obtain land to Ballymun.

**No. 218: Three Bridges Boxing Club**

Submission is from Three Bridges Boxing Club, who formed in 2010 and membership includes boys and girls from the settled and traveller community. The club is located in a small room at the back of the stage in Virgin Mary School. The club requests the provision of a new club premises to increase visibility and be more accessible for young people.

**No. 219: Thomas F. Quinn (leaseholder, Poppintree Neighbourhood Centre)**

Submission raises a number of different issues: -

- (i) Supports proposal to open the Hampton Wood junction into Hampton Wood.
- (ii) Site 20: requests that this small site is allocated for parking instead of its current mixed use proposal to secure the viability of Poppintree NC and notes
- (iii) Site nos. 21, 22, 23: should be developed for housing
- (iv) Site nos. 12 and 13: should be developed for housing with small percentage for green space
- (v) Site no. 14: should be for housing and not for sporting uses, as there is a shortage of accommodation

**No. 220: Transport Infrastructure Ireland, TII**

The Trans-European Transport Networks (TEN-T) are a planned set of transport networks across Europe, with regulations defining objectives to provide safe, secure and high-quality standards for road users and freight transport. The core network in Ireland consists of the route from Northern Ireland via Dublin to both Cork/Ringaskiddy and Limerick/Foynes, of which the M50 plays a key role. It is important that policies and objectives are drafted to allow the network of national roads to continue to play the intended strategic role etc. There is a critical need to manage these key roads in accordance with national policy as outlined in Smarter Travel (DTTAS 2009) and the provisions of Spatial Planning and National Roads Guidelines for planning Authorities (DoECLG 2012). The draft LAP includes no reference to the DoECIG Guidelines nor to the critical need to safeguard function of the national road network in the area. The submission from TII recommends this requirement in reflected in the LAP.

Protection of the M50 Corridor: The TII recommends that the M50 Demand Management Report is referenced and evaluated in relation to land use planning issues; and that zoning proposals in proximity to national road networks such as the lands at Junction 4 of M5, if included in the LAP are supported by required evidence base to demonstrate that the additional traffic loading can be accommodated. The Council should ensure a consistent approach between DCC and Fingal CO. Council.

TII recommends that consideration is given to including the requirements of Chapter 3 of the DoECLG Spatial Planning and National Roads Guidelines in the LAP concerning specific objectives relating to Traffic and Transport Assessment, Road Safety Audit, Environmental Noise requirements and Signage.

**No. 221: Tom Noonan**

Submission is supportive of Ballymun Kickhams's submission to Draft LAP.

**No. 222: Val Andrews**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 223: Vincent McAree**

Submission is supportive of Ballymun Kickhams quest to attain land to build a facility nearer to Ballymun to bring the club home.

**No. 224: Vinny Kelly**

Submission is supportive of Ballymun Kickhams to be at the "heart" of the community and not beyond the M50.

**No. 225: Warren Whitney**

Submission relates to Metro North alignment at Section 5.4.3 of Draft Plan.

Understands the concerns about severance of the areas east and west of Main Street, but believes that no option should be ruled out while the NTA/TII Metro alignment study is ongoing. Feels commitment to an alignment option for Metro is premature pending conclusion of alignment study.

**No. 226: Wendy Dowling**

Submission is supportive of Ballymun Kickhams quest to obtain land closer to Ballymun.