
Material Alterations to Draft Ballymun Local Area Plan 2017 Chief Executive's Report on Submissions from Public Display of Material Alterations to Draft Plan

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/observations received on the Material Alterations of 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.

In accordance with Section 20(3) of the Planning and Development Act 2000 (as amended) **this report addresses only those submissions made in relation to the proposed material alterations** and the likely significant effects on the environment of implementing the proposed alterations.

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.

2 Process to Date

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 Members (presentation given to the North West Area Committee (NWAC) on the 16th June 2015 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 5th November 2015 to 3rd 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. 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 6th November: 10am - 1pm
- Thursday 12th November: 1pm - 4pm
- Saturday 21st November: 10am – 12pm
- Thursday 26th 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 5th April to Wednesday 17th 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.

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 th April:	17.30 - 19.30
Saturday 22 nd April:	10.30 - 12.30
Wednesday 26 th 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.

A total of 226 no. submissions were received by Dublin City Council during the consultation period. In accordance with the requirements of Section 20 of the Planning and Development Act (as amended), a Chief Executive's Report was prepared, which summarised and detailed the submissions received on the Draft Ballymun LAP and provided a response and recommendations of the Chief Executive to the issues raised during the consultation (Report no. 199/2017 refers). The Elected Members, having considered the views expressed by the public proposed 58 no. motions giving direction to the Chief Executive regarding local planning and development issues to amend the Draft Ballymun LAP. The Chief Executive provided responses and recommendations to the issues raised in the motions (Report no. 254/2017 refers).

At a Special Council Meeting on the 11th July 2017, the Elected Members considered the Draft Ballymun Local Area Plan, and the Chief Executive's Report No. 199/2017 on submissions, and Report No. 254/2017 on Motions resolved to amend the Draft Ballymun Local Area Plan, and to place the material amendments on public display for not less than four weeks, and that written submissions will be considered by the City Council before the Ballymun Local Area Plan is made.

2.3 Material Alterations of the Draft Ballymun LAP

The public display period of the Proposed Material Alterations of the Draft Ballymun LAP took place from Monday 31st July to Monday 28th August 2017 (inclusive). This Material Alterations document was accompanied by environmental determinations prepared in accordance with Section 20 of the Planning and Development Act 2000, as amended, Strategic Environmental Assessment Directive (2001/42/EC), Article 14 of the Planning and Development (Strategic Environmental Assessment) Regulations 2004 and Article 6 of the Habitats Directive 92/43/EEC.

During this period, the Material Alterations of the Draft Ballymun LAP were made available for viewing at the City Council offices at Wood Quay, in the Civic Centre, Ballymun and online at www.dublincity.ie.

Public notification of this public display was made 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.

A total of 24 no. submissions/observations were received during this statutory display period.

3 Submissions Received

A total of 24 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 and Local Government and the prescribed bodies are dealt with separately to other submissions received. For clarity all submissions received from prescribed 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 and Local Government (Submission no. 4)

Submission Summary:

The submission from the Dept. notes the additional and amended objectives and has no further comments to make.

Chief Executive's Response:

The Chief Executive welcomes the submission and support from the Dept of Housing, Planning and Local Government.

Chief Executive's Recommendation:

Submission noted and agreed. No further amendments are necessary.

3.1.2 Environmental Protection Agency (EPA) (Submission no. 3)

Submission Summary:

The submission notes the Council's position regarding the need for Strategic Environmental Assessment (SEA) of the Proposed Material Alterations to the Draft Ballymun LAP and welcomes the inclusion of the new Section 5.11 – 'Integration of Environmental Considerations'. This will clearly show the link between the SEA and AA process and how they informed the Plan preparation. The EPA acknowledges the inclusion of amendments to further support cycling and public transport usage, and to integrate the Transport Strategy for Dublin 2016-2035 into Section 5.4.

Future Amendments to the Draft Plan

In relation to potential future amendments the City Council should determine whether the implementation of such would likely to have significant effects on the environment. This assessment should take account of the SEA Regulations Schedule 2A Criteria (SI 46 of 2004) and should be subject to the same method of assessment as undertaken in the “environmental assessment” of the Draft Plan.

SEA Statement – “Information on the Decision”

Following adoption of the Plan, a SEA Statement should summarise the following: -

- How environmental considerations have been integrated into the Plan
- How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan
- The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and
- The measures decided upon to monitor the significant environmental effects of the implementation of the Plan

Chief Executive’s Response:

The Chief Executive welcomes the submission from the EPA and acknowledgment of the changes made to the Draft Plan at the Material Alterations stage.

In the event of any further amendments to the LAP, the City Council will take account of the provisions set down in SEA Regulations Schedule 2A Criteria with respect to assessing their potential impacts on the environment. Additionally, following adoption of the LAP a SEA Statement will be prepared in line with the submission from the EPA and sent to the environmental authority.

Chief Executive’s Recommendation:

Submission noted and agreed. Retain new amended Movement Objectives MO1, MO2 and MO3 and new Movement Objectives MOA, MOB and MOC (refer to Section 4.1.2 of the Material Alterations document).

Retain new ‘Section 5.11 Integration of Environmental Considerations’ (refer to Section 4.1.7 of the Material Alterations document).

3.1.3 Fingal County Council (FCC) (Submission No. 8)

Submission Summary:

The submission from Fingal County Council recognises and welcomes the broad range of issues which are outlined in the Draft LAP and proposed material amendments and is fully committed to contributing to the future sustainable development of the M50 lands.

FCC supports the overall strategy for the Ballymun LAP which is to facilitate and coordinate development opportunities on a number of key sites while at the same time addressing issues such as infrastructure, economic development, public realm and community/sporting facilities to achieve a sustainable city neighbourhood.

In relation to the Material Alterations the submission from FCC supports the new: -

- Movements Objectives proposed for inclusion at the end of Section 5.4.6 - MOA, MOB, MOC.
- Wording and objectives to be included in Section 5.8 (Sports, Recreation & Open Space) relating to the provision of a new home for Ballymun Kickhams.

The submission notes that the mutual planning strategy between DCC and FCC will aim to optimise the relationship of future development with Metro North and maximise the benefits of having a high capacity public transport system running through Ballymun.

Chief Executive's Response:

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

Chief Executive's Recommendation:

Submission noted and agreed. Retain new Movement Objectives MOA; MOB and MOC (refer to Section 4.1.2 of the Material Alterations document).

Retain new text and objectives to be included in Section 5.8 relating to the provision of a new home for Ballymun Kickhams (refer to Section 4.1.6 of the Material Alterations document) and amended wording for Objective SR08.

3.1.4 Irish Water (IW) (Submission no. 9)**Submission Summary:**

The submission from Irish Water does not anticipate that the proposed material alterations will impact on its ability to facilitate the Ballymun LAP. The submission advises that Irish Water will only be in a position to confirm water and wastewater availability for site specific new development through Irish Water's pre-comment enquiry process.

Chief Executive's Response:

The Chief Executive welcomes the submission and support from Irish Water.

Chief Executive's Recommendation:

Submission noted and agreed. No further amendments are necessary.

3.1.5 Transport Infrastructure Ireland (TII) (Submission no. 24)**Submission Summary:**

The submission from the TII observes and welcomes the inclusions in Chief Executive Reports no. 199/2017 and no. 254/2017 which have taken account of TII's submission and also the member's motions to the Draft LAP.

Submission notes that Amendment no. 6, as per Report no. 199/2017 was not included in the Material Alterations which have been put on display.

The submission notes that the Draft LAP includes no reference to the Department of Planning, Housing and Local Government's 'Spatial Planning and National Roads Guidelines for Planning Authorities' (2012), or to the critical need to safeguard the strategic function of the national road network in the area. TII recommends that this requirement is reflected in the LAP prior to adoption.

The TII seeks clarification that the adopted plan will include 'non-material alterations' with appropriate corrections to provide for the protection of the M50 corridor.

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.

In relation to TII's request for clarification on the 'Proposed Amendment no. 6 from Report no. 199/2017', the Chief Executive's Recommendation was accepted by the

Elected Members at its meeting on the 12th June. No further changes were made to this amendment at the Special Council Meeting on the 11th July and as such it is deemed to be accepted and will be included in the final adopted version of the LAP. This amendment was excluded from the public display of the Material Alterations as it was deemed to be a “non-material alteration”.

With respect to the TII’s request for reference to the Dept’s ‘Spatial Planning and National Roads Guidelines for Planning Authorities’ it is noted that the Dublin City Development Plan has been prepared in the context of a systematic hierarchy of strategic plans and guidelines operating from the national level down to local level. In this regard the Development Plan takes account of the required statutory guidance on various planning policy areas as published by the Department of Housing, Planning and Local Government. The LAP is within this hierarchy and fully accords with the policies and objectives of the Development Plan. Furthermore it is noted that Proposed Amendment no. 6 from Report no. 199/2017 references the aforementioned Guideline document.

In relation to the TII’s request to protect the M50 corridor, it is proposed to include a new sentence within ‘proposed amendment no. 6’ to provide this.

Chief Executive’s Recommendation:

Proposed Amendment No. 1:

Insert new text in ‘Proposed Amendment no. 6’ from Report no. 199/2017 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*’ **to safeguard the strategic function of the national road network in the area.**

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

The following submissions from the public substantially relate to non-material matters with the exception of the first two topics (Housing and City Farm, see 3.2.1 and 3.2.2 below) which have been dealt within the Draft LAP and considered by Elected Members as part of the process to date.

Issues outside the scope of the material alterations placed on public display cannot be included in the Plan at this stage (as per Section 20(3) (j) (ii) of the Planning and Development Acts). However the report acknowledges all submissions made and where possible refers the issues raised to the pertinent objectives/sections of the Draft LAP, for information purposes only.

3.2.1 Housing (Submission no. 13)

Submission Summary:

A submission was received from the Worker’s Party outlining their political stance on housing and requests that any development should contain a mix of publically owned housing along with co-operative housing.

Chief Executive Response:

The LAP’s Development Strategy on Housing and Tenure is set out in Section 5.6 of the Draft LAP. The Strategy strongly supports a policy of mixed tenure for the area, as per the following Housing Objectives: -

“HO2: Ensure future housing development helps to create a good tenure mix locally and provide various housing types and typologies to meet the needs of all sectors of society.

HO3: Provide for new social / voluntary housing via the Part V requirement under the Planning and Development Acts.

HO4: Explore options for and provide new affordable housing in the area.

HO5: Explore options for and provide new senior citizen housing in the area (step down model preferable)".

These objectives and vision are further supported by the two new Housing Objectives which were the subject of the recent public display period: -

HOA: Promote self-build housing in the form of terraced homes or housing blocks built by residents or housing co-operatives by making available low-cost housing sites and providing technical assistance to those who wish to house themselves.

HOB: Seek to improve the income mix in all housing developments in the area to address the issues raised in the Retail Study.

The Material Alterations also included additional text to be inserted at the end of the Housing Section (i.e. before the Housing Objectives) which is line with the request of the submission from The Worker's Party: -

It will also allow the Council to respond to the need for additional Social and Affordable units in Ballymun and ensure that the future development of the housing sites will be done on a site by site basis with consultation from the community.

Chief Executive Recommendation:

Submission noted and agreed. Retain new Housing Objectives HOA and HOB into the Local Area Plan and retain proposed amended text before the Housing Objectives section (refer to Section 4.1.6 of the Material Alterations document).

3.2.2 City Farm (Submission no. 13)

Submission Summary:

This submission supports the proposal for a city farm within the LAP area. It acknowledges that a feasibility study is now required to progress the project.

Chief Executive Response:

Section 4.1.6 of the Material Alterations document sets out new text for Section 5.8.1 Open Space relating to allotments / community gardens / urban farm as follows: -

Allotments / Community Gardens / Urban Farm

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 skate park and bike park, and also a community farm / allotments. There is a need for a detailed review of these lands as part of implementing the LAP.

The Proposed Material Alterations include an amendment to Objective SR07 as follows: -

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, which can include co-operative housing, on the western half of the site and to explore the provision of a skate park and bike park, 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).

Chief Executive Recommendation:

Submission noted and agreed. Retain proposed new text regarding Allotments / Community / Urban Farm and retain amended Objective SR07 (refer to Section 4.1.6 of the Material Alterations document).

3.2.3 Metro North (Submission nos. 5 and 13)

Submission Summary:

A submission was received in support of a New Metro North running underground in a cut and cover tunnel as has been originally proposed and approved by An Bord Pleanála. This submission states that a surface metro will create significant severance along Main Street and split Ballymun into east and west. It acknowledges the work in constructing Main Street in Ballymun and considers that at a surface level Metro would negatively Main Street with respect to visual impact (overhead cables) and pedestrian and vehicular movements. Furthermore the submission includes references to the EIS of the approved Metro North on the reasoning for the selection of the underground metro to support the above. It considers this to be an important issue for Ballymun's future and thus for the LAP. Submission no. 13 also considers Metro North to be crucial for the regeneration of Ballymun.

Chief Executive's Response:

The Material Alterations which were subject of the recent public display period did not relate to Metro North. This is a new issue which cannot be addressed at this stage of the process, as the Draft LAP was agreed at the Special Council Meeting on the 11th July by the Elected Members.

Objective MO2 already states that the line should ideally run underground.

Chief Executive's Recommendation:

Submission noted. Does not relate to material alterations to the draft LAP.

3.2.4 Santry Cross (Submission nos. 6-7 and 10-23, inclusive)

Submission Summary:

A number of submissions were received regarding the existing Santry Cross residential development and the proposed redevelopments of site nos. 17 and 18. The submissions detailed the structural and anti-social issues which are experienced by the residents of Santry Cross (residential development to the south of Balbutcher Lane North) with the 'open' nature of the scheme cited as one of the reasons for some of these issues. There is also opposition to the proposed site briefs for site nos. 17 and 18 on the grounds of overshadowing, creation of new

access routes in and around the area, creation of unsafe junction with the current access arrangement for the underground car park and opposition to sharing the existing parking with a future development.

Chief Executive's Response:

The Material Alterations which were subject of the recent public display period did not relate to Santry Cross residential development or to the site briefs proposed on site nos. 17 and 18. These are new issues which these submissions have raised and cannot be addressed at this stage of the process, as the Draft LAP was agreed at the Special Council Meeting on the 11th July by the Elected Members.

With respect to the existing issues facing Santry Cross, this is not a matter that falls within the scope of this land-use plan which examines the remaining vacant sites from a planning and development framework. These matters can be explored under the Building Control legislative context, with Safer Ballymun (action based problem solving partnership between An Garda Síochána, Dublin City Council and local community) and the management company.

Chief Executive's Recommendation:

Submissions noted. Do not relate to material alterations to the draft LAP.

3.2.5 Town Centre (Submission nos. 1, 2, 13)

Submission Summary:

Two un-named submissions were left in the comment box in Ballymun (nos. 1 and 2) requesting redevelopment of the shopping centre. The submission from the Worker's Party states that the redevelopment should contain retail business, incubation units, leisure and residential components and that it is delivered with full community consultation and involvement. The party is opposed to selling it to a private developer.

Chief Executive Response:

The Material Alterations which were subject of the recent public display period did not specifically relate to shopping centre / town centre lands. These are new issues which these submissions have raised and cannot be addressed at this stage of the process, as the Draft LAP was agreed at the Special Council Meeting on the 11th July by the Elected Members. However it should be noted that the completion of the Main Street, including the shopping centre site are priority issues for the LAP. Section 5.3.1 of the Draft LAP sets out the City Council's proactive efforts to acquire the Ballymun Shopping Centre and the work to develop this and the adjoining sites as a focus for the regeneration strategy of Main Street and address the retail shortage and seepage in the area.

Chief Executive Recommendation:

Submission noted. Does not relate to material alterations to the draft LAP

3.2.6 Industrial Lands (Submission no. 13)

Submission Summary:

This submission from The Worker's Party requests that sufficient land is provided within the LAP to ensure that space is provided for business and industry development. The proximity to the M50, Dublin Airport, City Centre and many other advantages need to be exploited within this LAP to ensure that Ballymun can provide employment and business opportunities for its residents and business.

Chief Executive Response:

The Material Alterations which were subject of the recent public display period did not specifically relate to zoning additional land for industrial use. The submission

does not refer to any specific Material Alteration reference number, page number or section. In any case, Draft LAP objective EO11 states:-

E011: Support the continued development, **expansion and intensification** of the Poppintree and Ballymun Industrial Estates as employment hubs, **and where feasible seek to create defined urban edges to their perimeters to create streetscapes and to work with the IDA where necessary to achieve this objective.** ~~improve the lands surrounding the Ballymun Industrial Estate through future development.~~

Chief Executive Recommendation:

Submission noted. Does not relate to material alterations to the draft LAP.

4 Summary and Conclusion

The submissions received from the Prescribed Bodies continue to support the Draft Ballymun LAP and the proposed material alterations.

The submissions from the public substantially relate to non-material matters with the exception of the first two topics (Housing and City Farm, see 3.2.1 and 3.2.2 above) which have been dealt within the Draft LAP and considered by Elected Members as part of the process to date. Issues not relating the proposed material alterations have been addressed in the report for information purposes but cannot be included at this stage in the plan making process.

5 Next Steps: Adoption / Amendment of Plan

The Elected Members are invited to consider the Chief Executive's Report on Submissions of Material Alterations to Draft Plan. During this period of consideration Members are invited to submit motions. Motions can be submitted by **5.00pm on Friday the 15th of September.**

The Chief Executive will then prepare a report on these motions, and circulate this second report to Members in advance of the meeting of the **2nd of October 2017.**

The Members will then be invited to consider both reports and shall by resolution, make the Local Area Plan, with or without the proposed amendments except where it is decided to make a modification to a material alteration. A further modification to a material alteration can only be made where it is "*minor in nature and therefore not likely to have significant effects on the environment or adversely affect the integrity of a European site*". It cannot be made where it refers to: -

- (i) *"an increase in the area of land zoned for any purpose, or*
- (ii) *an addition to or deletion from the record of protected structures"*¹

A Local Area Plan shall have effect four weeks from the day that it is made.

Owen P. Keegan
Chief Executive
Dublin City Council

Dated 20th September 2017

¹ As per Section 20, Planning and Development Act 2000, as amended.

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.	Un-named		Received in comment box in Ballymun
2.	Un-named		Received in comment box in Ballymun
3.	Cian	O'Mahony	Environmental Protection Agency
4.	Colin	Ryan	Dept of Housing, Planning & Local Govt
5.	Niall	Duffy	
6.	Noel	Rock	TD
7.	Antoinette	Reilly	Santry Cross
8.	Matthew	McAleese	Fingal County Council
9.	Suzanne	Dempsey	Irish Water
10.	Brian	Phelan	Santry Cross
11.	Michael	Geraghty	Santry Cross
12.	Trevor	Whelan	Santry Cross
13.	Eoin John	O'Mahony Dunne	The Worker's Party
14.	Daniel	Bowyer	Santry Cross
15.	Noel	Smith	Santry Cross
16.	Donna	Barry	Santry Cross
17.	Susan	McEntegart	Santry Cross
18.	Susan	Higgins	Santry Cross
19.	Angela	Balzano	Santry Cross
20.	Mary	Nagle	Santry Cross
21.	Patrick	Higgins	Santry Cross
22.	Paul	Hudson	Santry Cross
23.	Alex	Parsons	Santry Cross
24.	Tara	Spain	Transport Infrastructure Ireland

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

1. Un-named

Request a shopping centre, not expensive supermarkets, like Centra or Supervalu.

2. Un-named

Draft LAP does not mention old/current shopping centre or future plans for new or upgraded shopping centre. This was also not included in the BRL regeneration of Ballymun.

3. Environmental Protection Agency (EPA)

SEA Determination

Note DCC's position on the need for SEA of Material Alterations.

Specific Comments on the Alterations

Welcome inclusion of the new Section 5.11 – Integration of Environmental Considerations. This will clearly show the link between the SEA and AA process and how they informed the Plan preparation.

Acknowledge inclusion of amendments to further support cycling and public transport usage, and to integrate the Transport Strategy for Dublin 2016-2035 into Section 5.4.

Future Amendments to the Draft Plan

The Planning Authority should determine whether the implementation of the future Amendments would likely to have significant effects on the environment. This assessment should take account of the SEA Regulations Schedule 2A Criteria (SI 46 of 2004) and should be subject to the same method of assessment as undertaken in the "environmental assessment" of the Draft Plan.

SEA Statement – "Information on the Decision"

Following adoption of the Plan, an SEA Statement should summarise the following:

-
- How environmental considerations have been integrated into the Plan
- How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan
- The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and
- The measures decided upon to monitor the significant environmental effects of the implementation of the Plan

4. Dept of Housing, Planning and Local Government

Notes the additional and amended objectives and has no further comments to make.

5. Niall Duffy

New metro North should run underground in a cut and cover tunnel as had been originally proposed and approved by ABP. If it runs at surface level it will create significant severance along the Main St, which would essentially spilt Ballymun into East and West

At grade Metro would hinder the benefits of New Metro North as trams interacting with traffic have a consequent negative effect on the running of the metro line. Submission notes the statements regarding this within the EIS for the original Metro North, as approved by ABP.

This matter is very important for the future of Ballymun which is the subject of this LAP.

6. Noel Rock TD

Submission relates to site to the south of Santry Cross (Linnbhla apartments). The following issues need to be investigated: -

- (a) Existing property needs to be gated & secured as there are issues of anti-social behaviour on this site
- (b) Details of the site have not been shared with current residents of Linnbhla
- (c) Residents are already paying two times over the average rate of property management service fees and not getting adequate return on this
- (d) Garda presence around here is low and this needs to be addressed if any additional work is to occur on this site

The needs of the current residents should be addressed first and foremost before moving forward.

7. Antoinette Reilly

Opposed to the proposed development of another block of apartments to the south of Linnbhla apartments.

Current development already has serious anti-social behaviour issues and additional extras would only exacerbate the situation and make the current development feel totally closed in.

8. Fingal County Council (FCC)

FCC recognises and welcomes the broad range of issues which are outlined in the Draft LAP and proposed material amendments now on display and is fully committed to contributing to the future sustainable development of the M50 lands.

FCC supports the overall strategy for the Ballymun LAP which is to facilitate and co-ordinate development opportunities on a number of key sites while at the same time addressing issues such as infrastructure, economic development, public realm and community/sporting facilities to achieve a sustainable city neighbourhood.

Section 5.4 Movement

FCC supports the following new Objectives proposed for inclusion at the end of Section 5.4.6; MOA, MOB, MOC.

Section 5.8 Sports, Recreation and Open Space

FCC supports the new wording and objectives to be included in Section 5.8 relating to the provision of a new home for Ballymun Kickhams.

Conclusion

FCC reiterates their support for the policies and objectives contained within the Draft Ballymun LAP and proposed material alterations, with particular reference to the M50 Lands, which are located within Fingal's administrative boundary and the provision of a new home for Ballymun Kickhams.

The mutual planning strategy between DCC and FCC will aim to optimise the relationship of future development with Metro North and maximise the benefits of having a high capacity public transport system running through Ballymun.

9. Irish Water

Irish Water does not anticipate that the proposed material alterations will impact on Irish Water's ability to facilitate the Ballymun LAP. The submission advises that Irish Water will only be in a position to confirm water and wastewater availability for site specific new development through Irish Water's pre-comment enquiry process.

10. Brian Phelan

Strong objectives to the density, design and layout of the planned residential scheme in the environs of Santry Cross (corner of Ballymun Main Street where Linnbhla / Charter buildings are).

The area was badly designed originally and now has a very densely populated area with little services for the occupants and is open and has been subject to serious anti-social behaviour and damage.

The planned development adjacent to this will lead to further issues of traffic / congestion at the traffic lights and pose further challenges to the occupants of Santry Cross.

Further consultation and engagement directly with residents adjacent to this proposed scheme should be entered and their issues resolved before any further development be approved in it is vicinity.

11. Michael Geraghty

Object to proposals to extend housing in the Balcurris Rd area linked to the Santry Cross (SC) development: -

- Safety access of gated underground access directly onto a through road
- Already unmanageable levels of anti-social behaviour leading to a high cost of repair and maintenance of property
- Parking availability is an issue for existing development
- Additional security measures are required for existing development – not opening it up for additional new development
- Proposed building on site no. 17 will block sunlight into apartments in Linnbhla & Charter block & shared court-yard
- Proposed extension of Balcurris Rd will create ingress / egress point into Balcurris – joy riding is an issue, without creating more easy access in and out of the area.
- Proposed extension of Balcurris Rd via access road to underground car parking will create an unsafe junction at both entrance and exit to the underground car park

12. Trevor Whelan

Opposed to proposed housing development at Santry Cross (SC)

- High level of anti-social behaviour in the area
- Council have been asked on several occasions to gate Santry Cross, The Hampton as there is a high level of internal vandalism and the area can be accessed too easily.
- Residents of SC Management Company will hire legal services to prevent the Council building housing on land that was sold to private owners.
- New housing will have a negative impact on the owners of SC and Hampton as it will reduce the value of the properties, require sharing of parking, bin collections and access

13. The Worker's Party (Eoin O'Mahony and John Dunne)

Housing

Worker's Party is committed to a policy of public housing provided for all, irrespective of means. Requests that any development should contain a mix of publically owned, as well as co-operative housing.

With respect to Ballymun the submission states that there has always been a crisis in housing but in the last decade, housing adequacy and provision have become acute problems.

The Worker's Party have produced a plan entitled 'Solidarity Housing' which promotes the idea of a European Cost Rental Model as a solution to housing crisis.

Town Centre

In order for the town centre to be sustainable the submission states that it should contain retail, business incubation units, leisure and residential components and that it should be delivered with full community involvement and consultation. It is opposed to selling the site to a private developer.

City Farm

Submission supports the proposal for a city farm within the LAP area. Acknowledges that a feasibility study is now required to progress the project.

Transport

Submission notes that Ballymun is located on the proposed Metro North line and this is crucial for the regeneration of Ballymun.

Industrial Zoning

Submission requests that sufficient land is provided within the LAP to ensure that space is provided for business and industry development. The proximity to the M50, Dublin Airport, City Centre and many other advantages need to be exploited within this LAP to ensure that Ballymun can provide employment and business opportunities for its residents and business.

Summary

The pursuit of the following areas: -

- (A) Housing
- (B) Town Development
- (C) Transport
- (D) Industrial Development

Is of crucial importance to the completion of the regeneration of Ballymun.

14. Daniel Bowyer

Proposed extension of Balcurris Rd via an access road to underground car parking will create an unsafe junction at both entrance and exit to the underground car park. Additional security measures are required for existing development – not opening it up for additional new development.

Already unmanageable levels of anti-social behaviour leading to a high cost of repair and maintenance of property.

15. Noel Smith

Santry Cross development currently suffers from significant anti-social behaviour due to the openness of this development. Increasing access to the apartment blocks will only increase anti-social behaviour.

Requests increased security.

16. Donna Barry

Santry Cross (SC) development has structural faults (damp, mould, water ingress etc.).

These apartment buildings were built under the auspices of BRL and no-one takes responsibility for anything.

The proposed apartment block beside SC would be adding insult to injury. Feel like the residents of SC are being ignored.

Ongoing anti-social behaviour and no control over the communal areas.

17. Susan McEntegart

Opposed to proposed plans for site no. 17 and 18 as follows: -

- (a) Area of site no. 18 is utilised as a green open space area. Addition of a 4/5 storey block would completely overshadow the 3 stories of Linnbhla block.
- (b) Existing service issues for SC including car parking availability. SC is unable to 'share' its services and car parking with proposed new development
- (c) Significant anti-social behaviour exists and the Garda resources are unable to manage it. Adding to the population without addressing these issues will see the situation worsen.
- (d) Proposed extension of Balcurris Road via the existing 'access 'road' to the underground car parking would create a number of problems – create an unsafe junction for the car and further open the rat race around the area.

Disappointed in the planned regeneration of the area. Requests that the existing problems of the area are resolved before increasing the resident population. Requests that LAP focuses on bringing business into the area – currently travels outside of the area to access local services

18. Susan Higgins

Objects to the proposed works in and around the Linnbhla block of SC.

19. Angela Balzano

- Safety access of gated underground access directly onto a through road
- Already unmanageable levels of anti-social behaviour leading to a high cost of repair and maintenance of property
- Development of site nos. 17 & 18 will reduce privacy of apartments facing this existing space
- Parking availability is an issue for existing development
- Additional security measures are required for existing development – not opening it up for additional new development
- Proposed building on site no. 18 will remove open space area which is currently utilised
- Proposed building on site no. 17 will block sunlight into apartments in Linnbhla & Charter block & shared court-yard
- Proposed extension of Balcurris Rd will create ingress / egress point into Balcurris – joy riding is an issue, without creating more easy access in and out of the area.
- Proposed extension of Balcurris Rd with such close proximity to the pedestrian areas of the complex will provide a hazard

20. Mary Nagle

Object to any further development that would attach itself to the Santry Cross (SC) development.

SC development is besieged with anti-social problems; cars get damaged in the underground car park.

Property values have devalued and not 'bounced back'. Unclear given strategic location of Ballymun.

Requests a shopping centre to be built.

21. Patrick Higgins

Opposed to anything which will 'open' the Santry Cross development up as it is negatively impacted by anti-social behaviour by people gaining access into the development and causing damage.

The estate needs to be protected and accessibility to the open spaces, car park areas etc. should be closed down for visitors and services.

22. Paul Hudson

Opposed to proposed housing development at Santry Cross: -

- Safety access of gated underground access directly onto a through road
- Already unmanageable levels of anti-social behaviour leading to a high cost of repair and maintenance of property
- Development of site nos. 17 & 18 will reduce privacy of apartments facing this existing space
- Parking availability is an issue for existing development
- Additional security measures are required for existing development – not opening it up for additional new development
- Proposed building on site no. 18 will remove open space area which is currently utilised
- Proposed building on site no. 17 will block sunlight into apartments in Linnbhla & Charter block & shared court-yard
- Proposed extension of Balcurris Rd will create ingress / egress point into Balcurris – joy riding is an issue, without creating more easy access in and out of the area.
- Proposed extension of Balcurris Rd with such close proximity to the pedestrian areas of the complex will provide a hazard

23. Alex Parsons

- The area and Santry Cross suffer from a high level of anti-social behaviour
- Development of site nos. 17 & 18 will reduce privacy of apartments facing this existing space
- Proposed building on site no. 17 will block sunlight into apartments in Linnbhla & Charter block & shared court-yard
- Concerns that opening a gated underground car park onto a through road may lead to a accident
- Parking availability is an issue for existing development
- Using private property as an access point will have management and insurance implications that will make the current SC property unmanageable and fees prohibitive
- Proposed extension of Balcurris Rd will create ingress / egress point into Balcurris – joy riding is an issue, without creating more easy access in and out of the area.

24. Transport Infrastructure Ireland (TII)

TII observes and welcomes the inclusions in Chief Executive Reports no. 199/2017 and no. 254/2017 which have taken account of TII's submission and also the member's motions to the Draft LAP.

Submission notes that Amendment no. 6, as per Report no. 199/2017 was not included in the Material Alterations which have been put on display. The correction of this is critical to ensure the protection of the M50 corridor.

The submission notes that the Draft LAP includes no reference to the Department's Spatial Planning and National Roads Guidelines for Planning Authorities, or to the critical need to safeguard the strategic function of the national road network in the area. TII recommends that this requirement is reflected in the LAP prior to adoption. TII seeks clarification that the adopted plan will include 'non-material alterations' with appropriate corrections to provide for the protection of the M50 corridor.