



Proposed Draft Variation (No. 6) of Dublin City Development Plan 2016 – 2022

Executive Summary

The Variation

The variation seeks to change the zoning of lands at Marrowbone Lane from primarily Z9 (with smaller elements Z1, Z6 and Z10) to Z14; and to add new text to the Development Plan to set out a clear framework for the regeneration of the lands.

The Purpose of the Variation

The variation before the Members seeks to enable the regeneration of Marrowbone Lane by providing an appropriate zoning to allow the Council owned lands be re-organised, and the depot operation consolidated on a significantly smaller footprint. This will enable the release of a significant block of land which will facilitate new routes through this area, new housing, new sports facilities and open space that will be integrated with the Sports facility at St. Catherine's. It will also provide an opportunity to re-make Marrowbone Lane with quality public realm, well designed street frontage with a mix of attractive ground floor uses and new community spaces.

The approach taken has been directly informed by the Liberties Local Area Plan, the Liberties Greening Strategy, and by sporting proposals associated with St Catherine's. By zoning for regeneration, the Council can move forward with preparing Part 8 planning applications for the lands, allowing for Member's input into detailed design and for further consultation.

Submissions

In total 115 submissions were received; of which one contained 878 signatures. These mostly are a mix of local residents, Elected Members, schools and sporting organisations. One submission was received from the Department of Housing, Planning & Local Government and one from the Midlands & East Regional Assembly.

Issues Raised

Of the submissions received, the majority considered the location to be unsuitable for a consolidated depot use including the impact from traffic and 24 hour noise; sought increased open space provision in the Liberties, with many seeking a full size pitch at this location. They raise the importance of open space for health and for youth engagement, and that there is currently a low volume of open space and sporting facilities in the area. Other issues raised included increasing the provision of housing on the site as the amount proposed is too low, concerns regarding connections through Marian Villas, concerns regarding public realm and footpaths and the need to preserve recycling services in the area.

The Department submission highlights the planning context of compact urban development in the National Planning Framework and National Development Plan for redevelopment of the lands; and points out the functions of the Land Development Agency and seeks the Council to reflect on other possible options to allow for full redevelopment of the site.

The Regional Assembly submission supports the proposed variation and considers it to be consistent with the Regional Planning Guidelines for the Greater Dublin Area 2010-2022.

Response

The variation will provide a policy framework to enable the Council move ahead with new planning applications, which will involve further public consultation and decisions by the Elected Members. The proposal for the lands will bring significant benefits to the Marrowbone Lane area. It will consolidate and modernise the existing depot, free up depot lands on the north side of the Lane for a significant new housing development and reduce the footprint of the depot by almost half.

The new reorganised space allows a real opportunity for regeneration; for new connections through the lands, creation of a quality public realm and quality urban edge as street frontage both within and on the perimeter of the lands; will provide a new community space and retail/café uses at ground floor level revitalising the Marrowbone Lane area as well as allocating a new area of green space adjacent to St. Catherine's. This space will allow for two new all-weather pitches adjacent to existing supporting facilities, as sought by the Liberties Greening Strategy. The Council has made significant progress in implementing the Greening Strategy since the adoption of the current City Development Plan; Weaver Park has been developed and is open, an upgraded St. Audeon's is almost ready to open; Bridgefoot Street park is being progressed, and new full size GAA pitch and park is a core part of the planning application being prepared for St. Teresa's Gardens and a number of smaller schemes and interventions are being delivered. In total the area of new parkland recently delivered and in train surrounding the Marrowbone Lane provides an increase of over 4 hectares (over 10 acres)¹.

The variation allows elected members to reaffirm their commitment to the Council's direct labour force as it will facilitate the provision of greatly improved depot facilities on part of the site.

The suggested housing figure for the variation area of 100 units can be revisited as the project moves to detailed planning design and the opportunity to increase this, whilst respecting the adjoining properties can be maximised, allowing for a greater provision of social housing from the lands. In all, the depot consolidation project will enable the release of former depot lands for in excess of 300 new social housing units in the South Central Area.

Recommendation to the City Council

Having regard to the submissions received and to the Chief Executive's Response to the issues raised therein, it is recommended that the City Council adopt the Proposed Draft Variation (No.6) of the Dublin City Development Plan 2016-2022.

¹ This is not including St. Audeon's or Newmarket Square.

1. Proposal

It is proposed to vary the Dublin City Development Plan 2016-2022 by changing the zoning of the subject lands at the site Marrowbone Lane (including DCC depot lands), Dublin 8 and to add additional text and map to the City Development Plan:

From : Zoning Objective Z1 - To protect, provide and improve residential amenities,

Zoning Objective Z6 – To provide for the creation and protection of enterprise and facilitate opportunities for employment creation,

Zoning Objective Z9 - To preserve, provide and improve recreational amenity and open space and green networks,

and

Zoning Objective Z10 - To consolidate and facilitate the development of inner city and inner suburban sites for mixed uses, with residential the predominant use in suburban locations, and office/retail/residential the predominant uses in inner city areas,

To: Zoning Objective Z14 – To seek the social, economic and physical development and/or rejuvenation of an area with mixed use, of which residential and “Z6” would be the predominant uses.

It is proposed to **add the following text to section 15.1.1.19** of the Dublin City Development Plan 2016 – 2022 relating to SDRA 16 Liberties and Newmarket Square:

13. To provide for the following elements in the regeneration of the Marrowbone Lane depot site; see Figure 36(A):

Consolidation and reduction in area of the existing City Council depot.

Provision of new public space onto Marrowbone Lane.

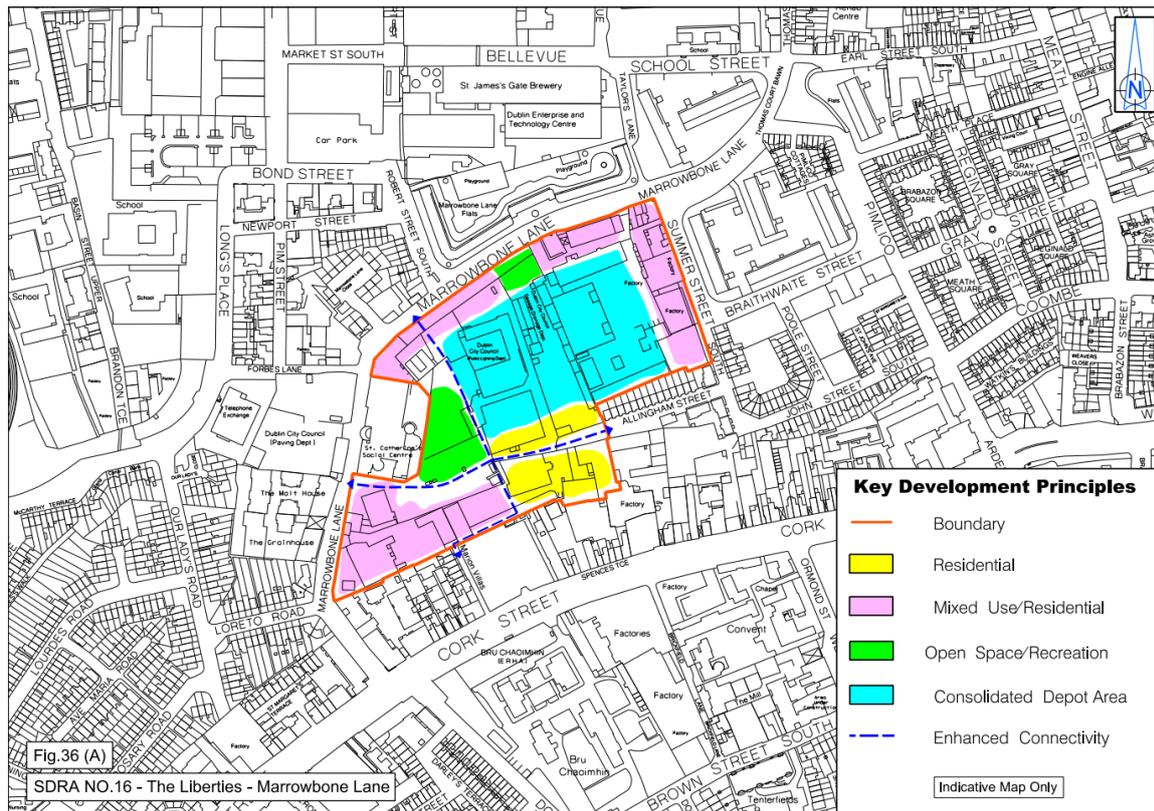
Extension of amenity/recreational spaces in association with St. Catherine’s sports centre.

New east-west link through the site to the south of St. Catherine’s Sports Centre to link up with Allingham Street including the provision of new residential uses.

New north south route linking Marrowbone Lane with Cork Street via Allingham Street and Marion Villas.

Provision for new mixed uses onto Marrowbone Lane and Summer Street South to provide definition and activity onto the street.

And to **insert the following new Figure, 36 (A):**



2. Procedure Followed

Public Notice and Public Display

Members of the public were invited to make submissions regarding the Proposed Draft Variation. In accordance with the procedures set out in the Planning and Development Acts 2000 as amended, the proposed variation was placed on public display from 15th of November 2018 to the 13th of December 2018 (inclusive) and a public notice was inserted into the Irish Independent.

Copies of the Proposed Draft Variation and amendment, together with SEA and AA screening reports, were made available for inspection at the Civic Offices, Wood Quay, Dublin 8 within the above listed dates. Details were also available on the City Council's website at www.dublincity.ie.

STRATEGIC ENVIRONMENTAL APPRAISAL

The Planning Authority determined, using the screening criteria set out in Schedule 2A Planning and Development Regulations 2001-2004, the DoEHLG SEA Guidelines and Annex 2 of Directive 2001/42/EC, that a Strategic Environmental Assessment is not required for the Proposed Draft Variation to the Dublin City Development 2016-2022 set out above.

APPROPRIATE ASSESSMENT SCREENING

An Appropriate Assessment Screening was undertaken of the Proposed Draft Variation of the Dublin City Development Plan, in accordance with the requirements of Article 6(3) of the EU Habitats Directive (92/43/EEC). The Proposed Draft Variation is not predicted to have a likely impact on the key features or the conservation function of any Natura 2000 sites.

The prescribed bodies were notified of the above determinations in relation to SEA and AA, and no objections to the conclusions were received within the appropriate period. Inland Fisheries Ireland made a submission indicating agreement with the conclusions of the screening process for appropriate assessment.

3. Purpose of the Proposed Variation

The proposed variation has been brought about by the opportunity presented in rationalising and streamlining the existing essential DCC depot network together with the progress made in the implementation of recent and proposed changes to the provision of open space in the Dublin 8 area. These two changes have given the Council the opportunity to extend into the Marrowbone Lane area the principles of regeneration and place making. The area in question currently lacks a cohesive built form, quality environment and public space, is not efficiently utilised and does not provide modern working conditions for operational staff. For these reasons the Council proposes to take the first step in achieving a new quality environment at this location by zoning the lands in question for the purpose of regeneration. The variation sets out the framework for forming a quality new open space, strong street frontage, new community space, much needed new housing and also providing for good mixed use including preserving employment within the area.

The lands (4.6ha) form part of the Strategic Development and Regeneration Area (SDRA) Area 16 in the current City Development Plan, and an appropriate zoning for this key site within the Liberties Local Area Plan 2009 (now extended to 2020) will aid the successful implementation of the LAP. Providing a Z14 zoning for the lands sets a policy context to allow for an integrated design approach to be taken, led by clear objectives for the redevelopment of the lands in question prescribed in the City Development Plan. Passing the variation will enable the Council to move forward with delivering a number of significant improvements and new assets to the area.

The rationalisation of the City Council depot network will deliver a well-designed efficient and consolidated depot on a significantly smaller footprint (45% of its current footprint) ensuring the continued delivery of essential Council services. The location of the depot is pivotal to responding to the City's requirements and maintenance needs ensuring quality and speed of service. The location of the depot in this area also has a key role in serving the City Centre and South City and needs to be close to the core business, retail and tourist area as is practicable to serve this area well. A more remote industrial location for this use runs the risk of recurring traffic delays through the working day for staff, slowing the volume of work that can take place and delaying urgent and emergency responses.

By providing this efficiency and consolidation of Council depots on Marrowbone Lane, the balance of the lands can be given over to the provision of improved amenity and recreational facilities, some residential and mixed use development and new access routes as provided for in the Liberties Local Area Plan. In addition, the consolidation of depots at this location will facilitate the release of sites across the south city for much needed housing development, as agreed at the July 2018 City Council meeting and the September 2018 Housing SPC meeting.

The variation proposes a clear set of objectives to be contained in the Development Plan that will ensure that the future development of the area will have to include:

- the provision of additional all weather pitches adjacent to and managed by St. Catherine's Leisure Centre (one 7 a-side pitch: 60m x 35m; one practice pitch: 20m x 35m; in addition to the existing astro field),
- the provision of an additional 100 plus new residential units,

- an improved active street frontage and public realm along Marrowbone Lane,
- improved permeability of the area by provision of 2 new access routes - the Robert Street South extension & an extension to Allingham Street.

4. Report on Submissions and observations

4.1 List of Submissions Received

The following persons or bodies made submissions or observations in relation to the proposed variation of Development Plan.

Sub No	Name	Organisation
1	Fergus Reilly	N/A - Private Resident of the Area
2	Bonnie Dempsey	None
3	Philip Murray	Resident living on Thomas Court
4	John Barry	Resident of Marrowbone Lane
5	Andrew Foley	Berand Ltd
6	Gráinne Ahern	None - resident of Dublin 8
7	Simon Bailey	None-resident
8	Helen Shaw	Athena media
9	Cormac Looney	None- Property owner on Marrowbone Lane
10	Brian Kelly	Personal
11	Brian Kelly	Templeogue Synge Street GFC
12	John Feeney	Local resident
13	Declan Flynn	Home owner on Marrowbone Lane
14	Ed Brophy	Local resident
15	Colin Smyth	n/a
16	Christopher Byrne	Myself
17	Rebecca Pelan	
18	Frank Murphy	Malthouse property owners
19	Frank McDonald	
20	Ms Nalini Nathan	Resident on Marrowbone Lane
21	Kamila Walsh	Malthouse, marrowbone lane
22	Stephen Donnelly	Resident
23	Alan Mee	personal capacity
24	Dave O'Hara	Solas Project
25	Tony Bourke	Resident
26	Mr Conor Humphries	NA
27	Margaret Molloy	
28	Kieran Rose	Resident
29	Jim Conway	Eastern and Midland Regional Assembly
30	Derrick Howard	
31	Anne Roper	
32	Cian O'Mahony	Environmental Protection Agency
33	Laura Nolan	none
34	Peter Sirr	
35	Pamela	Resident of the Liberties
36	Eoin	Resident

Sub No	Name	Organisation
37	Fiona McDonald	Individual
38	Thomas Grey	Private D8 resident
39	Paul Barry	Director, McGoverns Corner Management Company
40	Damien Kaye	St. Catherines Park Residents Association
41	Clodagh O'Reilly	ReCreate Ireland - although my submission is as a resident of Dublin 8
42	Vicky McIntosh Comerford	Special needs mother!
43	Dermot Egan	Cork St Studios
44	Sandra Schliszio	private
45	Mo	
46	John Higgins	Resident - Reuben Avenue, previous Emerald Sq
47	Tom	Liberty Saints RFC, Marrowbone Lane, Dublin 8
48	Liz Gill	
49	Lorraine Doyle	On behalf of my family and extended family who live in Dublin 8.
50	Alanagh Gannon	N/A
51	Ben Butlin	HSE / clinical psychology
52	Amanda Barry	
53	Denise Dempsey	D8 resident
54	Edel Reilly	Local resident, 32 Eugene Street, Dublin 8
55	Kieran Doyle O'Brien	individual
56	Simon Doyle	
57	Laura Monaghan	None personal
58	Celia Keenan	IFUT
59	Avril Gannon	Resident and member of St Catherines park residents association
60	Stephanie Sammann	Resident of the Malthouse on Marrowbone Lane
61	Aaron	Liberty Saints
62	Austin O Néill	Liberty Saints RFC
63	Bradley	Oliver bond Celtic
64	Erin	Liberty Saints RFC
65	Darren west	Liberty saints rfc
66	Nicola Giraldi	Liberty Saints RFC
67	Bernadette Byrne	None
68	Walt van Heerden	N/A
69	Michael Pidgeon	Green Party
70	Fiona Connelly	Canal Way ETNS
71	Oisin Davis	None
72	Thomas Farrell	
73	Eddie Fox	Griffith Barracks Multi Denominational School
74	Maria Bennett	None
75	Tony O Rourke	USHER CELTIC F. C.
76	Tony O Rourke	USHER CELTIC F. C.
77	Cllr Criona Ni Dhalaiagh	On behalf of Sinn Fein Group Dublin South Central

Sub No	Name	Organisation
78	Amy Carroll	Resident
79	Tara Deacy and Jen Cummins	
80	Edward Carroll	
81	Leah Cullen	Resident
82	Jo MacSweeney	Resident
83	Cllr Tina MacVeigh	Councillor
84	P Wynne	
85	Roisin Ryder	Resident
86	Liam Somers	Resident
87	Giovanni Giusti	Resident
88	Paul O'Boyle	Resident
89	Cllr Rebecca Moynihan	Councillor
90	Raymond Lambert	Resident
91	Kate Stapleton	Resident
92	Trevor Keppel	Local Resident
93	Ann Marie Spillane	Scoil Treasa Naofa
94	Adrian Farrell	Local resident (Malthouse)
95	Robert Gleeson	Tenters Residents Association
96	Andi Ciobanu	Liberty Saints
97	Orla Russell-Conway	
98	Michelle A Magner	Resident
99	Fiona O'Hara	Resident
100	Tommy Daly	Sporting Liberties
101	Ceall	Dubliner
102	Ivana Milivojevic	Res
103	Sam Slote	Resident
104	Donnchadh O'Neill	Local resident
105	Natasha Crudden	Transport Infrastructure Ireland
106	Catherine Cleary	The Dublin 8 Open Space Alliance
107	Catherine Walsh	
108	Zoe Obeimhen and others (878)	Resident
109	Niall Cussen	Department of Housing, Planning and Local Government
110	Aoibheann O'Sullivan	Resident
111	Patsy Kearns	Kevins Hurling and Camogie Club
112	Jane Hackett	Resident
113	Cllr Ciaran Cuffe	Councillor
114	Flora Fleischer	None
115	Alan Foley	

4.2 Submission by Department of Housing, Planning & Local Government (DHPLG)

Summary of Submission

The Council received a submission from the Department of Housing, Planning & Local Government. The submission notes the proposed change in the context of the development potential of the lands in question and the rationale for restructuring and bringing forward new development. It points to the recent establishment of the Land Development Agency (LDA) and their function to achieve more strategic and effective land management of state lands to successfully implement the National Planning Framework and National Development Plan. It states that the full strategic redevelopment of this site should be fully examined, and the possibility of other site options for the depot be explored, and to engage with the LDA as part of this consideration.

Chief Executive's Response

The approach proposed for this site is considered to be in keeping with the policies and objectives of the National Planning Framework and the draft Regional Spatial & Economic Strategy. As outlined above, the halving of the footprint of the depot presents an opportunity to bring about a key piece of regeneration and quality development within an inner urban area, whilst also retaining important local Council services that is essential to meeting the service needs of a busy City core and the responsibilities of the Council. In developing the objectives for the variation, the Council has sought to address the competing needs within this inner urban location; for much needed new housing; for quality new open space to ensure an attractive living and working environment; to use the opportunity presented for the site to bring about significant improvements for pedestrian and cycle connectivity; to provide greater street frontage and passive supervision of streets and spaces, and to ensure a mix of uses across the site by not reducing the amount of local employment provided within the area. It should also be noted that a second large Council depot site on Marrowbone Lane on the opposite side of the road is proposed to be relocated to the subject site thereby freeing up the lands for the provision of an estimated 120 social housing units.

Dublin 8 has an historic tradition of being both a place of employment and of housing. The Z14 use sought respects this balance, which is essential to providing sustainable and vibrant mix with the inner City, and also protecting necessary local services close to where their demand is greatest. The Council has already undertaken an examination of other land options in the wider South City area and considered a range of sites for this use. However none of the sites considered could meet the needs identified and the preferred option is consolidation of operations at Marrowbone Lane.

Recommendation

Submission is noted, no change recommended.

4.3 Submission by the Regional Assembly

Summary of Submission

The submission outlines the policy context of the proposed variation and states that it considers that the variation would support compact sustainable growth and the provision of residential development as set out in the core strategy of the City Development Plan; and is considered to be consistent with the Regional Planning Guidelines for the Greater Dublin Area 2010-2022.

Chief Executive's Response

The support and planning rationale expressed recognising the benefits for consolidating the use of the site and enabling new residential and recreation space is welcomed.

Recommendation - Submission is noted, no change recommended.

4.4 Issues Raised in the Submissions Received & Chief Executive's Response

Following a detailed examination of all submissions received, the issues raised by each submission were categorised in relation to the matters they raised. (See Appendix 1 for table.) In general the majority of submissions raised issues that fall into four themes, namely (1) the inclusion of the rationalised depot; (2) the need for more open space and community facilities in the area (3) need for more housing; and (4) concerns regarding lack of public consultation. A fourth summary section is also included below (miscellaneous) that outlines a range of other issues raised in lower numbers. For each theme, the points raised are summarised and the Chief Executives response on this particular theme is addressed in the immediately following paragraph, followed by a recommendation.

4.4.1 Issues relating to continuation of the DCC depot at this location.

A number of submissions expressed a lack of support for the depot because of (i) traffic & congestion on tight narrow roads in a mainly residential area; (ii) road safety issues for locals but mainly children and elderly with too much parking; (iii) noise & light pollution from operation of the depot; (iv) type of use that is not compatible with the area trying to emerge as a vibrant city living area and (v) it is not compatible with attracting economic investment in the area. Reference is made to the developing St James Quarter or growing the existing Tourist attraction of Diageo's Guinness site.

The view was expressed that the depot use takes up space that should be used for additional green space or for higher density housing at this location, particularly a full sized sports pitch, and that it is better suited in an industrial area that is less dense and where the competition between green spaces and other uses is less intense, e.g. Davitt Road or M50. Also suggested is using the site for a smaller scale depot and building above the depot space as a better use of land. A number of the submissions describe the variation proposal as the Council amalgamating other depot services into this site and expanding the role of the depot beyond its current use; and express concern in relation to the impact on traffic and noise on a 24hr basis from this intensification of the depot site. Some submissions express a view that they are not against the existing depot, just an expansion or intensification of the use. One submission raised the importance of retaining recycling facilities at Marrowbone Lane as an important local service.

Chief Executives Response

The points made regarding the location of the depot reflect the innate complexity of this site and the history of its zoning; as well as the character of this area of Dublin City. Dublin 8 by its nature contains a wide mix of uses, including industrial (such as Guinness) as well as local services and employment areas, residential, heritage and both new and older recreation and community facilities. As a Council operational facility has existed at this site since the mid-1800s, the location of a depot in this area has played an important role in serving the needs of the immediate area as well as serving the City Centre.

The proposal for the depot at this location will see the range of Council operations from the Marrowbone Lane area focussed on roads and surface water maintenance, street cleaning and housing maintenance. Other major services (including public lighting, electrical services) are relocating to the new major depot at Ballymun, from which they will provide a city wide service. The proposal put forward as part of this variation is not, as some submissions express, an expansion and intensification of the existing depot; but the opposite. The Council is moving a number of services out of the area, but still has a need for a local depot, located close to the City centre to ensure that it can provide a quality service quickly as and when the needs arise. The Council is rationalising and scaling down the footprint (by almost half) and also the extent of services provided at Marrowbone Lane, including also vacating other depot lands in the immediate vicinity.

This is a result of the upcoming larger new city-wide depot facility being proposed for Ballymun (adjoining the M50) which will cater for a much wider range of purposes. The redevelopment of the variation site will also allow the Council provide modern upgraded working conditions for the staff based here. In relation to traffic impact, the reduction in entrances and improved footpath widths will have a positive impact on traffic management and for pedestrians on the Lane.

As part of the planning stage there will be a detailed traffic management study and road safety audit undertaken, and the recommendations of those incorporated into the design of the facility, ensuring that traffic from the depot will be better managed. Also planned as part the consolidation of the depot is the provision of extensive electric car and van charging facilities to enable the switching of the Council fleet over the coming years, reducing the Council's carbon footprint and contributing to reducing airborne pollution in the City.

Dublin 8 is a mixed use area, with many employment uses of different types located and operating in proximity to housing. The reduced scale of the depot will some-what reduce the volume of activity operating from this site, which will have a benefit on the immediate environs. However, it should be noted that in the context of the wider area and the high volume of traffic movement from the many other uses and employers in the area that the wider impact of the scaled down depot in this location is negligible. The rationalised depot design will seek to address some of the current concerns regarding the operations, including lighting, traffic and noise. It should be noted that any new depot will proceed through its own planning process where detailed proposals to mitigate these impacts can be addressed.

The points made that providing a local Council service within the area it serves is not compatible for this location are not accepted. The Council has a responsibility to deliver essential services, including housing maintenance, street cleaning, road a footpath maintenance and surface water and flood management in the Dublin 8, south City and the City core. Not doing this service efficiently and effectively undermines the attractiveness of the City as a place of business, tourism and leisure. Not efficiently and effectively maintaining the properties and public realm owned by the Council undermines the attractiveness of Dublin 8 and South City area.

Whilst there is merit in building above depot space and the Council did undertake an engineering study to examine this possibility; the current operational needs of the depot do not make this a viable option at this time. It should be noted that, if the variation is adopted, the redevelopment of the depot site will be able to proceed to a part 8 planning application, which will be subject to extensive consultation and design input, with the opportunity to incorporate noise minimisation measures; and will come before the Members for final decision.

It is considered that the development approach of mixed use on the depot lands being sought by the variation will make a significant improvement to the Dublin 8 area and will contribute to making it a more attractive location for investment. All cities are a collage of uses, whether it is brewing and distilling, IT hubs, or local services, the mix of uses necessary to make a City function well form part of that pattern and provide the tapestry of urban living. A consolidated depot in this area is one part of many uses that contribute to a functioning City and urban environment.

Recommendation

Submissions are noted, no change recommended.

4.4.2 Issues relating to Open space /sporting/ community facilities for the area

A number of submissions look for the lands proposed to be mostly used for open space, including sport fields and for community facilities. A number of submissions point to past studies that identified the deficit of green space per capita in the area as being the lowest. A number of submissions welcome recent park additions to the area but express the view that they are not enough to address a scale of deficit in the area, and also when taking into account the loss of the allotments and community garden at Weaver Square. Comparisons are made to the scale of provision of park facilities in other towns and the outer suburbs such as Raheny.

A number of submissions highlight the lack of sporting facilities in the area and seek that the lands be used to provide for playing/all-weather full size pitches. They point to the lack of pitches and playing surfaces for other sports (tennis, basketball) in the inner city and also that schools in area find it difficult to provide PE curriculum/Sporting clubs for their pupils. A number of submissions point out that people need to use transport to get to other training grounds outside of area on congested city centre streets to play for their local clubs, teams or as individuals looking to engage in sport as a leisure activity. The submissions point out the importance of provision of open space and sports facilities for health (obesity amongst school going children & adolescents and the importance of green space and sport for mental health are both referenced). Also highlighted is the link with negative behaviour amongst school going children & adolescents and targeting their energy into positive activities and giving them something to do with their time.

A number of the submissions seek the provision of a full size GAA/multi sports pitch on the lands, plus supporting facilities (toilets and changing areas). They raise concerns that the variation is not supporting the Council Greening Strategy for the Liberties, and is thus ignoring the community wishes. Some submissions raised concerns regarding the levels of anti-social behaviour and drug taking that can take place in parks in the area.

Chief Executives Response

The points made about the importance of quality open space and facilities for both children and adults for leisure purposes are well made. This issue is one that the Council is addressing across the wider Dublin 8 area through a series of actions that are all currently granted or about to seek permission, under construction or recently completed. This site is one of the many proposed new sites for “greening” the Liberties, and is one piece of an overall strategy; initiated by the Liberties Local Area Plan, to bring about a series of public realm improvements to the area in tandem with investment in new housing and commercial uses across the area to bring about a higher quality urban environment in this historic part of the City.

As can be seen from the wider range of submissions, there are many competing demands on the use of publicly owned land in this area, not all of which can be reconciled. The need to provide new housing for the next generation of families and people within the inner City has to be balanced with the need for green space, and the balance proposed by the variation seeks to ensure that new housing and community facilities (indoor and outdoor) are delivered. For this reason, the Council has taken the opportunity at a nearby location to include in the regeneration plan for St. Teresa’s Gardens; a full size new pitch as part of a new park of 2.28ha; suitable for GAA/soccer as this is a much larger and physically cohesively shaped site, and will be directly served by upgraded changing and training facilities in an expanded DCC owned community sports facility directly from the pitch-side. The Council is in the interim actively working on providing a temporary pitch on the site so that facilities are available in the immediate future, rather than waiting until the long term location is available for development.

This large scale new playing facility at St. Teresa's Gardens, plus the new all-weather pitches at Marrowbone Lane served by St. Catherine's Sports Facility will provide a much greater quantum of sports facilities for both young and old within the area. The investment by the Council in other park projects planned or taking place in Dublin 8 bring forward other types of leisure spaces to serve the community and to implement the "greening" strategy for the area. In the years since the zoning of the Marrowbone Lane depot lands area open space in the 2016 Development Plan the Council has delivered a number of significant large scale parks projects, some of which are now complete and open for use.

The development of Weaver Park, immediately south of the variation lands at Marrowbone Lane, is a large (0.6ha) neighbourhood park, built on the site of former flats complex. The new park features a lawn for games and activities, an enclosed play area, a skateboarding terrace, benches and a pergola. Extensive landscaping has been carried out and the play areas are designed to cater for children of all ages. The completion of this park delivers one of the key large scale elements of the Greening strategy and makes a significant contribution to delivering a quality urban environment for the Liberties.

Nearby at Bridgefoot St, again the Council is investing significant resources and former housing land to the creation of a new park of 0.8ha (2 acres) aimed at providing a quality parkland and play environment for the surrounding community, with permission granted in Nov 2017.

A second major project nearing completion is St. Audeon's Park, High Street, a major upgrade of an under-used resource. Also part 8 permission has recently been approved for a significant investment in a high quality new public realm landscaped space at Newmarket Square. A new green space at St. Luke's, Cork Street was also granted permission and is now open. Slightly further south a new park incorporating all weather facilities will also be included in the Dolphins Barn regeneration, providing further sports facilities to the community. All of these projects, in combination with what is proposed as part of this variation will be implemented in the coming years to ensure delivery on the major new facilities identified as needed in the Liberties LAP and the Council Liberties Greening strategy for the area to improve the mix and quantity of open space in the area.

In total an increase of over 4 hectares (over 10 acres)² of new parkland has been recently delivered or is in train in the areas surrounding Marrowbone Lane.

The current (2018) draft Council Parks Strategy for the City undertook a spatial analysis of the entire City and its individual areas to assess the scale of provision, identify shortcomings and set out actions necessary to improve the City. The draft document demonstrates that the South Central area is not significantly dissimilar to other parts of the City in its percentage of park provision. (Percentage of total land that is parks: South Central: 11.23%, Citywide 17.18%, South East 4.99%, North West 12.45%,³).

The analysis of the South Central area demonstrates that the area has good overall access to community grade parks and highlights two gap areas that need addressing (Bluebell and Portobello). The strategy also sets out a series of planned investments in public parks within the inner city to address the particular challenges for public space in this area; with four of these proximate to the variation lands- St. Teresa's Gardens, Dolphin House, Bridgefoot St and Werburgh Street.

² This is not including St. Audeon's Park or Newmarket Square as both were in existence previously.

³ Page 49, Draft Dublin City Council Parks Strategy.

This clear intent and planned investment by the Council will ensure that the quality and quantity of green space within the South Central inner city area has, and will continue to be improved in the near future.

The current population (2016) of the Liberties LAP area (5 EDs) is 15,340, up by 2,183 from 13,157 in 2006 (a 14% increase). Housing stock in 2016 is 8,480 units and the area in question is 126 hectares. This gives a density of 67 units per hectare, and a population density of 122 people per hectare. It should be noted that these figures would not be considered to be at the extreme end of European city norms. The Docklands SDZ, also a mixed use area, provides for a population density of 184 persons per hectare (81 units per hectare).

Recommendation

Submissions are noted, no change recommended.

4.4.3 Need for More Housing.

A number of submissions express concern in relation to low amount of new housing proposed for the site. They suggest that this low number is an inefficient use of land, and that the amount of land for housing should be increased, or a greater density applied to the housing sites proposed. The submissions point out that the area is very well served by high quality public transport and that the lands are within walking distance of the City Centre, making it a very suitable location of high density housing. One submission suggests this location could be used as an opportunity to construct an “eco-village” type housing scheme.

Chief Executives Response

In relation to the provision of housing on the site, the figure of 100 is an estimate, based on the size of the plots identified, the need to take account of height in the context of impact on adjoining residential properties and providing for a mix of uses onto Marrowbone Lane. This variation will also facilitate the freeing up of the depot site on the north side of Marrowbone Lane, which will provide for approximately an additional 120 new social housing units. In all the depot consolidation project will allow the Council bring forward a number of smaller depot sites in the south City for housing- Garryowen Road (20); Sweeneys Terrace (3 or artist studios), Davitt Road (70); Sundrive Road (2).

Enabling the depot consolidation project to proceed will provide the Council will the land to build over 300 new social housing units in the South Central Area on Council land.

The design of the housing element of this regeneration site will be more comprehensively addressed as part of the preparation of any planning application on the site, and the opportunity to increase the amount of housing units on the site will be examined at that stage. It is agreed that the Council should, if feasible, and where in the interests of proper planning and development, provide a greater number of units in this SDRA area. Any new housing development will be designed to “A” rated BER standards, ensuring a high standard of sustainability and other sustainability driven options can be explored at design stage.

Recommendation

Submissions are noted, no change recommended.

4.4.4 Other Matters Raised in Submissions Received

A range of other issues were also raised by the submissions; some directly related to the variation and some related to wider planning and Council issues in the Liberties area. One area of concern was the loss of the allotments at Weaver Square to the provision of new social housing; with the point made that increased provision of housing at this location could avoid the loss of the allotment site. The increased amount of new student housing and apart-hotel developments in the area was a concern for a number of submissions and the failure of the Council to have a strong planning strategy for the area.

Also of concern was the number of derelict sites and buildings in the surrounding area, and that there is a perception of the area as a “dumping ground” for facilities and services. Issues also raised include traffic management and parking concerns in the streets surrounding the variation lands; including problems with one way systems, commuter parking and parking on footpaths. In relation to the proposed linkages across the site in the text for the SDRA, concern was expressed about a connection via Marian Villas, particularly as the cars of the residents of this narrow laneway have to reverse to access the lane, which could cause problems with increased pedestrian activity in the lane. One submission looked for the recycling facility to be retained at Marrowbone Lane in any redevelopment as it is an important local service. Some submissions raised concerns that the level of public consultation for the variation was inadequate, and that the views of the community were not considered in bringing forward the variation- particularly in not “greening” the area.

Other submissions sought improvements to the public realm of the area, and particularly pointed to the lack of on street tree planting across the area, the poor standard of public footpaths and in many areas the lack of an adequate width of footpath to cope with the volume of pedestrians passing along. One submission included an alternative layout from a person who undertook a dissertation study of the area. Other submissions raised the opportunity presented to make new connections both east west and north south through the area to improve the permeability of this location and supported the possibility of these being delivered through the variation. Also raised was the need for new development along Marrowbone Lane and other streets for units that allow activity at street level through cafes, restaurants etc., that will improve the character of the area and provide a useful local and tourist service.

Chief Executive’s Response

The variation proposed is part of a wider planning and Council policy framework, established by the Liberties Local Area Plan. The current City Development Plan and the previous, integrated the approach taken in the LAP into the policies and objectives for this area, particularly the SDRAs. This site was previously zoned industrial at the time of preparation of the LAP. The opportunity has now finally arrived to allow a reduction in scale of the depot lands in this area, and with this deliver policies and objectives of the LAP and the Greening Strategy for this location.

What is proposed in the variation is wholly in line with the content of the Greening Strategy as set out in Figure 3.1.1. The Strategy shows the area around St. Catherine’s as “enhanced local green space” with new all-weather pitches; which is what this variation has been guided by, and provided for. The LAP and subsequent Development Plans as well as a number of regeneration strategies are pushing the regeneration of areas of dereliction within the area, and to improve the quality of social housing provided. The successful implementation of the vacant site levy by DCC in 2018 will provide an added incentive to ensure that site dereliction is actively reduced in this area.

Whilst the impact of the economic crisis and subsequent fiscal constraints resulted in a delay to the implementation of a number of public projects of the LAP, the Council has in recent years invested significant land and financial resources to this area to achieve the aims of the LAP and the subsequent Greening Strategy.

In relation to improvements to tree planting and public realm, the Council will continue to invest in the area to increase tree planting, and is proceeding with a major new public realm project at Newmarket. Any application for development within the variation lands will also have to address the provision of a quality public realm and quality footpath provision as part of the development proposal.

The redevelopment of the variation lands will provide the opportunity to rectify the shortcomings with regard to public footpaths, tree planting and public realm along Marrowbone Lane and also provide new streets with high quality urban form and planting. In relation to the allotments, the Council is actively working to provide a new permanent location.

The concerns regarding the access through Marion Villas can be looked at in more detail with the option of addressing a suitable solution at either planning stage or subsequent policy revisions. It would be considered a lost opportunity for the variation not to progress due to a desire to change this element; which could be revised at a later stage, if concluded to be necessary. Also the wish to retain local recycling can be addressed at planning design stage.

Recommendation

Submissions are noted, no change recommended.

5. Recommendation to City Council

Having regard to the submissions received and to the Chief Executive's Response to the issues raised therein, it is recommended that the City Council adopt the Proposed Draft Variation (No.6) of the Dublin City Development Plan 2016-2022.

Dated this day the 18th January 2019.

Richard Shakespeare
Assistant Chief Executive