

**To the Chairperson and
Members of the Central Area Committee**

**Report No. /2023 of the
Assistant Chief Executive**



**Comhairle Cathrach
Bhaile Átha Cliath
Dublin City Council**

**BAILE BOGÁIN LOCAL AREA PLAN
CHIEF EXECUTIVE'S REPORT ON THE SUBMISSIONS RECEIVED ON THE PRE-
DRAFT PUBLIC CONSULTATION ISSUES PAPER**

October 2023

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1.0 INTRODUCTION

Dublin City Council (DCC) is preparing a Local Area Plan (LAP) for Baile Bogáin. The preparation of a LAP is identified as an objective of the current Dublin City Development Plan 2022-2028.

The Baile Bogáin (Ballyboggan) LAP area is located to the west of Glasnevin Cemetery, north of Cabra, south of Finglas and east of Pelletstown with an area of approximately 75 hectares including the circa. 52ha Dublin Industrial Estate, Glasnevin Business Park/Centre, Ballyboggan Business Centre, Ballyboggan Industrial Estate, Tolka Valley Business Park, Stag Industrial Estate, Broombridge Close, Glen Industrial Estate and a mix of properties along the north side of Bannow Road.

The LAP will shape the mixed-use regeneration of this significant brownfield location, well served by public transport and located close to the city centre, in line with strategic planning policy at a national, regional and local level.

1.1 The Role of the Issues Paper

An important step in making a LAP is to identify the issues for the local area from the point of view of local residents, businesses, land owners, state bodies operating services in the area, and other interested stakeholders.

To assist this process, DCC called for submissions on matters that the LAP should address and prepared an Issues Paper document to assist and encourage such submissions. This process ensures that important and informed local issues identified from a wide variety of sources are identified at an early stage to help the preparation of the draft LAP.

1.2 Public Consultation on the Issues Paper

Presentations were given to the Planning and Urban Form Strategic Policy Committee (SPC) and to a joint meeting of the Central Area Committee (CAC) and North West Area Committee (NWAC) on the 27th of April 2023, regarding the stages involved in making a LAP, the proposed process for pre-draft public consultation and important items to be included in the published Issues Paper.

The Issues Paper (i.e., pre-draft LAP) public consultation was launched on the 28th of April 2023 with the publication of a public notice and the Issues Paper document.

Copies of the Issues Paper document were provided in the Civic Offices in Wood Quay and at the Finglas Civic Centre, Mellows Road, Finglas for the duration of the public display period.

The Issues Paper and details on how to make a submission were posted on the DCC website. Use was also made of the DCC social media accounts (Facebook, Twitter, LinkedIn, etc) to help to notify members of the public. Members of the Planning Department were available to assist with any queries in relation to making a submission during the consultation period.

A total of four weeks (from Friday 28th April 2023 to Friday 26th May 2023) was initially provided for making submissions. This period was extended by a further two weeks (until 9th June 2023) to provide more time to allow members of the public to make a submission. Two public consultation 'drop-in' information events were held at Cabra Parkside Community Sports Centre on Thursday 18th May from 11 am and 1.30 pm and from 5.30 pm to 8 pm. An additional 'drop-in' information event was held at Experience Glasnevin at Glasnevin Cemetery on Thursday 25th May from 4.30 pm to 7.00 pm.

Staff were in attendance to discuss and explain the process for making a submission on the Issues Paper and to assist with any queries concerning the local area plan preparation process.

2.0 SUBMISSIONS RECEIVED

A total of 40 submissions were received by Dublin City Council during the consultation period. The purpose of this report is to summarise these submissions and present the Chief Executive's recommendation. The issues raised by prescribed bodies and state agencies are summarised individually while all other submissions are summarised thematically. A list of all submissions received is provided in Appendix 1.

2.1 Summary of Issues Raised by Prescribed Bodies / State Agencies and Chief Executive's Recommendations

2.1.1 Department of the Environment, Climate and Communications

Summary of Issues Raised

The Department's submission outlines its observations in respect of several policy areas which should be considered in the draft LAP in alignment with the Statement of Strategy for the period 2021-2023, Le Chéile 23. In summary, the Department recommends that the draft LAP.

- Has regard to the Climate Action and Low Carbon Development (Amendment) Act 2021 (Climate Act 2021) and to the Climate Action Plan 2023 (CAP 2023) in the preparation of the draft LAP.
- Considers the measures within the CAP 2023 relating to transport and reducing the demand for transport when drafting the LAP.
- Includes an objective of the Council to promote the development of appropriately scaled renewable energy installations and the development of additional supporting grid infrastructure to support accelerated renewable energy development.
- Includes policies to promote high levels of energy conservation, energy efficiency and the use of renewable energy sources in existing buildings, including retrofitting of energy efficiency measures in the existing building stock and energy efficiency in traditional buildings.
- Identifies retrofitting initiative priorities within the Ballyboggan local area and provides for policies to implement same.
- Examines the potential of district heating and measures to reduce the reliance on fossil fuel heating systems.
- Supports the transition to a circular economy.
- Considers the Draft Policy Statement on Geothermal Energy for a Circular Economy as applicable to the area.
- Supports 5G rollout and the implementation of the National Broadband Plan.

Chief Executive's Response

The Chief Executive acknowledges the Department's observations in respect of policy areas which should be considered in the draft LAP in alignment with the Statement of Strategy for the period 2021-2023, Le Chéile 23.

The Chief Executive highlights that the draft LAP will be an implementation output of the recently adopted Dublin City Development Plan 2022-2028 and will be developed in alignment with the strategic policy approach to deliver a low carbon climate resilient city to create a more sustainable future based on the 15-minute city approach. Climate Action will therefore be an integral and cross-cutting theme through the draft LAP. Locally appropriate

measures to support renewable energy and sustainable energy use and heating, etc will also be considered and set out in the plan where relevant.

Chief Executive's Recommendation

Ensure the draft LAP is informed by and consistent with the Climate Action and Low Carbon Development (Amendment) Act 2021 (Climate Act 2021) and CAP 2023.

Include climate action as an overarching and cross-cutting theme across the draft LAP in line with policies and objectives contained in the NPF, the RSES, the Dublin City Development Plan 2022-2028, Dublin City's Climate Change Action Plan and national legislation.

2.1.2 Department of Housing, Local Government and Heritage

Summary of Issues Raised

The Department's submission notes the area which is to be the subject of the draft LAP lies in the catchment of River Tolka and is traversed by the Royal Canal, the waters of both of which eventually enter Dublin Bay, in the case of the latter through the Liffey Estuary.

The Department supports proposals to create green corridors, habitats and new ecological connections but emphasises the importance of also retaining existing habitats to support biodiversity. It is noted that the section of the Royal Canal corridor traversing the area constitutes one of the richest areas for biodiversity within Dublin City.

The Department notes several transport projects are currently already in the planning stage which will affect the Baile Bogáin area including the extension of the LUAS from Broombridge to Finglas, DART+ West, DART + South West and the Royal Canal Greenway, the latter being brought forward by Dublin City Council. In making provision for these transport projects, an assessment of possible ecological impacts should take account of possible local adverse effects on flora and fauna.

The Department agrees with the Council's determination that a SEA should be carried out with regards to the draft LAP and similarly agrees with its determination that AA, involving the preparation of a Natura Impact Report (NIR), should be undertaken in respect of the plan.

Chief Executive's Response

The Chief Executive acknowledges the Department's observations concerning SEA and AA determinations. SEA and AA, involving the preparation of a Natura Impact Report (NIR), will be undertaken in respect of the draft plan.

The Chief Executive notes the importance of retaining existing habitats to support biodiversity. The protection, promotion and enhancement of biodiversity (including flora and fauna) in Dublin City is fundamental to achieving a healthy environment and a sustainable future for both our citizens and the wider natural environment. The draft LAP will recognise the value and role of the conservation and restoration of biodiversity and ecosystems in our city's natural environment and as a key measure to address climate change.

Chief Executive's Recommendation

Protect and enhance ecological diversity and the natural environment of both designated sites and undesignated areas.

In relation to Strategic Environmental Assessment, the draft LAP will incorporate appropriate policies or objectives to avoid or reduce significant effects on the environment identified in the assessment process.

In relation to Appropriate Assessment, any mitigation measures proposed to avoid impacts on Natura 2000 sites outlined in any NIR to be prepared as part of the forthcoming assessment process, will inform and guide the policy of the draft LAP.

2.1.3 Office of the Planning Regulator

Summary of Issues Raised

The Office of Planning Regulator (OPR) commends the planning authority for recognising Dublin Industrial Estate and environs as a vibrant and economically important asset to the city, albeit existing as a substantial underutilised land bank that may accommodate a greater intensity of development.

The OPR welcomes the timely commencement of the plan-making process, through the publication of the Issues Paper and recognises the strategic importance of these lands in terms of meeting the planning authority's housing supply target in a highly sustainable location within proximity to existing and proposed public transport connections including the existing Luas line and proposed Luas extension to Finglas.

The OPR sets out some broad issues, relevant to the preparation of most, if not all LAPs, in addition to some specific issues of particular relevance to the preparation of this LAP, under eleven thematic areas as follows; 1. Strategic policy framework, 2. Development Plan and Core Strategy, 3. Zoning, compact growth and infrastructural services, 4. Regeneration, 5. Social, cultural and community development, 6. Economic development and employment, 7. Transport and mobility, 8. Climate change and flood risk management, 9. Environment, built and natural heritage, 10. Implementation and Monitoring, and 11. Other Matters.

In summary, the OPR advises DCC to pay particular attention to the following issues in the preparation of the LAP:

- The LAP should identify specific investments and/or infrastructure to support regeneration development, such as site assembly, land acquisition, and/or sustainable transport initiatives and provide clarity regarding the potential phasing of future development.
- The planning authority should also engage with the NTA and TII at an early stage in seeking to deliver future public transport initiatives required to secure future growth and associated sustainable transport patterns for the LAP area.
- The local authority should consider the activation of land, such as compulsory purchase, land value sharing, derelict sites etc.
- The LAP should have regard to the provisions for social audits/settlement capacity audits which should establish the capacity of existing facilities, including community, leisure, amenity and cultural provision/uses which serve existing and future residents.
- The LAP should consider and seek to align any proposals with NPO 4 of the NPF which seeks to ensure the creation of liveable places that are home to diverse and integrated communities and NPO 28 providing improved integration and greater accessibility in delivering sustainable communities and associated services.
- The LAP should ensure the proactive implementation of the Design Manual for Urban Roads and Streets (2019), including in particular filtered permeability over the lifetime of the plan to better accommodate pedestrians and cyclists, in addition to public transport where available.
- The LAP should further explore and seek to enhance pedestrian linkages with particular consideration given to the relationship with Tolka Valley Park which should be recognised as an important recreational asset to the north of the LAP area.
- The planning authority should engage with the OPW at an early stage of the plan preparation process to ensure that any future development proposals and/or policies

and objectives are based on an accurate and up-to-date evidence base concerning flood risk management.

- The LAP should recognise the importance of integrating green and blue infrastructure into the LAP, in accordance with NPO 58 and the objectives and guiding principles of the RSES including RPO 7.22, 7.23, 7.24 and 7.25.
- The LAP should include Strategic Flood Risk Assessment (SFRA) and include policies and objectives in relation to the implementation of SuDS and nature-based solutions as a means for managing surface water run-off at key development sites.

Chief Executive's Response

The Chief Executive welcomes the positive engagement of the OPR during the pre-draft consultation stage of the LAP preparation process and is committed to further engagement in relation to the thematic areas identified concerning the translation and implementation of national and regional policies at the city and local levels.

Chief Executive's Recommendation

The draft LAP will be supported by the parallel development of an economic viability assessment that will examine infrastructure requirements and costings, land activation measures as well as other related matters.

The draft LAP will be informed by the development of a social and community infrastructure audit to establish the needs of the existing and future populations in the area.

The draft LAP will include a phasing plan to support viability and ensure timely plan implementation.

The draft LAP will include a Strategic Flood Risk Assessment (SFRA) and policies and objectives in relation to green and blue infrastructure, and the implementation of SuDS and nature-based solutions for surface water management as part of the draft LAP.

2.1.4 National Transport Authority

Summary of Issues Raised

A submission from the National Transport Authority (NTA) makes several observations and detailed recommendations based on the Transport Strategy for the Greater Dublin Area 2022-2042. It is the view of the NTA that Ballyboggan is an appropriate location for intensive residential and commercial redevelopment due to its location within the existing urban

footprint of Dublin City and the potential for a large proportion of travel demand to and from the area to be served by existing bus services; new services and infrastructure proposed under BusConnects; cycling and walking; and Luas Finglas and DART at the Broombridge interchange. In summary, the NTA recommends that the draft LAP;

- Fully reflects the current levels of sustainable transport accessibility on offer at the Broombridge interchange and the increased levels of future accessibility.
- Seeks to provide the highest intensity of development closest to the locations of maximum public transport accessibility at the Broombridge interchange and Finglas Road.
- Includes a phasing programme which seeks to develop around the areas of highest public transport accessibility in the initial stages of implementation.
- Includes a Local Transport Plan to be prepared as part of the LAP.
- Carefully considers the interface with DART+ West and Luas Finglas.
- Provides for bus transportation in a detailed manner setting out, with agreement from the NTA, potential locations for bus priority measures, layover and bus stops.
- Considers how the area's internal cycle network could most effectively tie into the GDA Cycle Network to provide continuity through Ballyboggan.
- Promotes filtered permeability and this principle is fully reflected in the urban form and layout proposed for the plan area.
- Identifies sites for potential schools if needed, based on their potential accessibility by walking, cycling and public transport.
- Explores the potential for shared mobility and neighbourhood car storage or collective parking units as part of a LAP parking strategy.
- Addresses how sustainable transport modes will be catered for safely and conveniently as the plan lands develop in a phased manner with new land uses potentially emerging alongside existing industrial/light industrial uses.

Chief Executive's Response

The Chief Executive welcomes the submission from the NTA and in particular welcomes the detailed recommendations made which will assist in the development of an appropriate development framework in the draft LAP. The Chief Executive looks forward to continuing engagement and collaboration with the NTA through the LAP preparation process.

The promotion of sustainable transport modes will be a key policy approach in the draft LAP. The draft LAP will align with the Transport Strategy for the Greater Dublin Area 2022-2042

and will be informed by the guiding principles for the integration of land use and transport set out in the RSES.

The Council will work proactively with the NTA to develop a Local Transport Plan to support the draft LAP.

Chief Executive's Recommendation

The draft LAP shall be developed in accordance with the Transport Strategy for the Greater Dublin Area 2022-2042.

The draft LAP shall be informed by the development of local transport planning, in collaboration with the NTA, taking account of national and regional policy and guidance.

To work proactively with the NTA in relation to the development of a Local Transport Plan to support the draft LAP.

2.1.5 Transport Infrastructure Ireland

Summary of Issues Raised

Transport Infrastructure Ireland (TII) submission addresses the safety, capacity and strategic function of the national road network and Luas in accordance with TII's statutory functions and several detailed observations are made.

The presence of Luas, Broombridge Tramstop, Depot and associated rail infrastructure will have practical implications for measures that may be included in the draft LAP. For general guidance, for any proposed development in close proximity to a Luas Line prospective development should ensure there is no adverse impact on Luas operation and safety including its infrastructure. The protection of this strategic light rail asset is required to maintain its strategic function in tandem with ensuring adequate levels of amenity and utility are delivered in the draft LAP.

Chief Executive's Response

The Chief Executive notes the submission from TII and acknowledges the strategic nature of light rail assets in the LAP area. This will be reflected in the draft LAP.

Chief Executive's Recommendation

DCC will work with TII and other national agencies, to protect and enhance the capacity of public transport infrastructure and protect the strategic function of the national road network.

The draft LAP shall support the delivery and improvement of public transport infrastructure and services including BusConnects, rail and LUAS in terms of connections, capacity, and efficiency of services in line with national and regional policy.

2.1.6 Office of Public Works

Summary of Issues Raised

A submission from the Office of Public Works (OPW) makes several observations and detailed recommendations specifically concerning flood risk management, without prejudice to further submissions that may be made concerning the OPW's estate portfolio, heritage and other areas of responsibility.

In relation to Flood Risk Management (FRM), the OPW advises that reference should be made to the Guidelines on the Planning System and Flood Risk Management (DHPLG/OPW, Nov 2009) issued under Section 28 of the Planning Acts, and associated Circulars and Technical Appendices, to ensure that the key principles of flood risk management and sustainable planning are adopted and considered at the earliest stage.

The OPW requests that clear commitments and strategic objectives regarding flood risk and the principles of the Guidelines are included in the draft LAP and that persons with the relevant expertise review any flood risk assessments submitted to DCC.

The OPW highlight specific flood risk management issues for consideration in the drafting of the LAP with respect to the protection and the need for maintenance of flood relief schemes, Additionally, planning authorities need to consider the potential impacts of climate change including increased rainfall intensities, increased fluvial flood flows and rising sea levels in the preparation of plans as well as impacts on other downstream areas. The OPW advises that the preparation of plans should consider the opportunities for nature-based solutions to reduce runoff and provide other benefits such as water quality, biodiversity, etc.

Chief Executive's Response

The Chief Executive welcomes the submission from the OPW and in particular welcomes the detailed recommendations made which will assist in the development of an appropriate development framework in the draft LAP, consistent with the Guidelines on the Planning

System and Flood Risk Management (DHPLG/OPW, Nov 2009), and associated Circulars and Technical Appendices, to ensure that the key principles of flood risk management and sustainable planning are adopted and considered at the earliest stage.

The draft LAP will be accompanied by a Strategic Flood Risk Assessment and DCC will further engage with the OPW to ensure that the SFRA aligns with the guidance. The Chief Executive looks forward to continuing engagement and collaboration with the OPW through the LAP preparation process.

Chief Executive's Recommendation

The draft LAP shall incorporate the requirements of the Guidelines on the Planning System and Flood Risk Management (DHPLG/OPW, Nov 2009).

2.1.7 Department of Education

Summary of Issues Raised

A submission has been made by the Department that notes that the Issues Paper does not contain future population targets for the LAP area and recognises that the future determination of land use zoning within it may be a key factor in that regard.

Therefore, the Department is not in a position at this time to indicate its priorities and future requirements for the area in respect of future education provision. However, given the scale of the regeneration lands, the Department is cognisant of the need for further engagement with the Council and is available for further consultation regarding school provision within the plan area when required.

The Department notes that an analysis of social/cultural needs will be undertaken as part of the preparation of the LAP to identify the needs of new and existing communities in the area, where this analysis will inform future land uses in the area and could identify the need for additional services such as schools.

Chief Executive's Response

The Chief Executive notes the observations of the Department regarding the future determination of priorities and future requirements for the area in respect of future education provision. The Chief Executive welcomes future engagement with the Department through the LAP preparation process in respect of the potential need for additional social/cultural infrastructure in the area including education facilities.

Chief Executive's Recommendation

The draft LAP will be informed by the development of a social and community infrastructure audit to establish the needs of the existing and future populations in the area.

2.1.8 Uisce Éireann

Summary of Issues Raised

Uisce Éireann (UÉ) notes that in relation to the Water Supply and Network, the area is located in an established water network and is located adjacent to large trunk mains. In general, the area may require local upgrades, and this can only be examined when connection enquiries are made, and the size of development is established.

In relation to Wastewater Treatment and the Sewer Network, it is noted that there is an established sewer network in this area. Wastewater from this area is transferred to Ringsend Treatment Plant via a number of pumping stations including, Ballyboggan Pumping Station and Finglas Road Pumping Station. Should areas of the LAP lands be re-zoned to provide for new high-density residential, these pumping stations may need upgrades. This can only be examined when the size of any future development is established.

UÉ note that although the area has separate foul / surface water sewers, the downstream network is combined and is constrained in areas. Should the LAP lands develop, no surface water shall be permitted to enter the foul sewer network.

UÉ note that where network reinforcements such as upgrades or extensions are required, these shall be developer driven unless there are committed UÉ projects in place to progress such works.

Chief Executive's Response

The Chief Executive notes the submission from UÉ and welcomes clarification regarding the current status of the network infrastructure in the area. The Chief Executive notes the observations relating to the need for further detail regarding the potential quantum of development envisaged in the LAP area and possible infrastructure upgrades. DCC will further engage with UÉ through the LAP process as the detail and quantum of development proposed in the LAP is established. DCC will prepare a surface water management strategy to inform the preparation of the LAP and the incorporation of SuDS and green infrastructure

will be an integral part of the design rationale of any development strategy. The Chief Executive welcomes future engagement with UÉ through the LAP preparation process.

Chief Executive's Recommendation

DCC will carry out further engagement with UÉ regarding the quantum and nature of the development proposed as part of the LAP.

The draft LAP will include Strategic Flood Risk Assessment (SFRA) and policies/objectives in relation to green and blue infrastructure, and the implementation of SuDS and nature-based solutions for surface water management.

2.2 Summary of Key Issues Raised by Members of the Public / Landowners/ Businesses/ Interested Parties, by Theme and Chief Executive's Recommendations

Having reviewed all of the submissions, several key themes were identified as matters to be considered in the preparation of the draft LAP. The themes closely follow the issues and matters identified in the Issues Paper and reflect a good understanding of the matters to be addressed.

- Creating a Vision for the Area
- Population and Housing Need
- Enterprise and Employment
- Placemaking
- Sustainable Movement and Access
- Social, Cultural and Community Development
- Landscape and Open Space
- Climate Action
- Phasing and Funding of Infrastructure
- Site Specific Issues

2.2.1 Creating a Vision for the Area

Summary of Issues

Members of the Public

Sub No 16, 22, 26, 31, 35.

Several submissions have been received that support the regeneration of the LAP lands. Submissions support a mixed-use approach to the development of the lands with a balance of residential, employment and other uses.

People feel that the future character and identity of the Ballyboggan area should have a heart and a real sense of place. At present, the area lacks a community focal point and the creation of a village centre with its own unique identity is supported. This could be a central location with a village square with spaces for multiple uses, markets, concerts, ceremonies and exhibitions of local work. Typical village uses and services would be supported such as a crèche and nursery, a school and shops.

It is noted that there are important existing businesses located in the industrial estates that residents in the area already rely on and that these must be considered when planning for any future developments.

Landowners

Sub No 8, 20, 25, 27, 30, 33.

Submissions identify the future potential of the LAP lands to develop as a residential-led, mixed-use area, supported by key public transport infrastructure and the established natural resources of Tolka Valley and the Royal Canal.

TU Dublin strongly welcomes a plan-led approach to the development of the lands which are close to public transport and well suited to the ideals of the 15-minute city. Submissions highlight the strategic location and nature of the LAP lands which are believed to offer the potential to accommodate significant population and employment growth sustainably, focused on public transport infrastructure investment in rail.

However, it is considered that the LAP needs to meet the challenge of providing certainties in terms of its objectives, scale and extent of development, use mix, and required infrastructure (and funding sources) as well as providing flexibility for housing types to ensure viability and deliverability.

It is submitted that the current Z6 'blanket' zoning objective is not the most appropriate and consideration should be afforded to land use zoning objectives that are bespoke and suited to the regeneration of brownfield sites.

Several submissions consider that the LAP lands are ideally situated for the application of a 'Z14 – Strategic Development and Regeneration Areas' zoning. This zoning would facilitate the delivery of significantly higher-density mixed-use development on the lands, with residential being the predominant use, overall representing a more efficient and sustainable use of many of the sites within the LAP area.

One submission notes that the use of a Z10 (Inner Suburban and Inner City Sustainable Mixed-Uses) zoning objective in the past has successfully facilitated mixed-use development on large-scale regeneration sites in the city consistent with the objectives of the 15-minute neighbourhood concept.

TU Dublin identifies that the Royal Canal and Tolka Valley Park are key features of the area and strong connections to both should be a defining feature. Creating a heart, ideally close to a transport hub, will help develop a sense of place. With Luas, rail, a major Greenway and easy access to the planned metro at Phibsborough, it is stated that this area could be a model of sustainable transport-orientated development. The challenge is seen as how

residential uses can be integrated into an area that is currently largely employment based in a phased manner.

Chief Executive's Response

The Chief Executive acknowledges the important contributions made regarding the development of a future strategic vision for the development of the LAP lands. The LAP will seek to develop and facilitate a sustainable, mixed-use area that will provide new homes in the city and create and support jobs, deliver new community facilities, and open spaces for the people of Dublin. The Chief Executive agrees that it is important that this new area develops its distinct character and identity over time, supported by the creation of at least one central public area to act as the core or heart of the new community.

Chief Executive's Recommendation

Determine the appropriate zoning objective/s for the LAP land that will deliver a viable, sustainable, residentially led development of the LAP lands and support employment and community use and open space, in line with the objectives of the 15-minute city.

2.2.2 Population and Housing Need

Summary of Issues

Members of the Public

Sub No 2, 4, 6, 9, 19, 31, 32, 36, 38.

Several submissions identify the critical need for housing as a key priority for the LAP to respond to the city's housing crisis. Some submissions state that there should be a mixture of social, affordable and cost-rental housing to help those on the housing list or help those struggling with the cost-of-living crisis and potential recessions or crises down the line. Some feel that any housing constructed must not be sold to private development funds as these companies will only make housing more unaffordable.

Submissions state that to deliver housing affordability and numbers, the LAP needs to consider if it is appropriate to build one or two-storey buildings as these will not be fit for purpose to deliver the quantum of housing needed. In principle, submissions support a reasonable intensity of residential development but only if this can be achieved without any adverse impact and overlooking of existing houses. It is stated that it would be reasonable to keep building height lower along the canal and in the parts of the area bordering existing housing estates, so as not to tower over them or deprive them of light – whereas in the parts somewhat removed from the borders of the area, it would stand to reason to aim for taller buildings to accommodate more people and make the 15-minute city a reality.

Further submissions highlight the general context of the lands in the wider area which includes a lot of three-bedroom houses. Looking to the future, it is seen that there is an opportunity for the LAP to give a choice for an ageing population to relocate to smaller accommodation or specific older person accommodation while continuing to live within and participate in their community.

Landowners

Sub No 25

TU Dublin state that the provision of residential accommodation will be dependent on opportunity – suitably located lands with owners interested in development, and the provision of basic amenities – schools, retail, social and recreational uses that underpin the 15-minute city. Lands to the south in Cabra, along the Navan Road, and to the north in Finglas provide a significant quantum of 3-bed type family-orientated housing. The LAP development should aim to provide a complimentary, more diverse mix of accommodation. Allowing higher densities close to public transport would be in line with good planning.

Chief Executive's Response

The LAP lands provide the opportunity to realise a significant quantum of residential accommodation over time in a high-quality and well-connected urban neighbourhood. This neighbourhood will provide greater housing options for people living in the area, increasing their options to stay in the community if they wish as their residential needs change over time.

The regeneration of the lands will provide an important contribution to the delivery of the Development Plan's Core Strategy responsibilities in respect of a growing city population and will be in line with the national and regional planning context pertaining to consolidation and intensification. Having regard to significant state investment in public transportation in the wider area (including Luas Finglas, Dart+ West and BusConnects) the lands have the potential to become an exemplar in urban design-led planning.

Chief Executive's Recommendation

Carry out a housing needs assessment to inform the development of the LAP in terms of the quantum, type, tenure and mix of housing that should be prioritised having regard to the surrounding residential context and in recognition of existing and proposed public transport accessibility and investment.

2.2.3 Enterprise and Employment

Summary of Issues

Members of the Public

Sub No 19, 28, 29, 31, 39.

A number of submissions express concern for any potential loss of traditional employment for local workers employed in the industrial area. It is queried if this type of employment can be accommodated or retained in a new residential area.

It is stated that the industrial estate should continue to support local jobs in enterprise in line with a 15-minute city. Support is expressed for existing businesses in the area such as gyms that are seen as well suited for integration into a residential area.

There is support for the development of innovation hubs, remote working hubs, accommodating small businesses, incubation for start-ups, investment into local skills and trades and apprentice shops for the motor trade. Some feel that larger businesses could be retained and be relocated within the area.

Landowners

Sub No 20, 25, 33

The LAP process is seen as an opportunity to reverse the extensive vacancy and perceived underutilisation of the LAP lands at present. It is stated that some of the existing industrial / employment uses are no longer suited to this location and are relocating from Dublin Industrial Estate to significant employment-zoned lands beyond the M50, as provided for and encouraged in the National Planning Framework. It is therefore considered that a LAP can maximise the development potential of these extremely strategic lands in a coordinated and cohesive manner.

It is noted that some of the existing employment uses will remain in the medium and long term. Residential-led developments with a supporting element of retail or other commercial uses (social and community) are considered to be appropriate for this location.

Submissions emphasise that it is a vitally fundamental consideration in setting out the future land use mix policy for the area to consider the viability of uses. To not do so and place and to place an over-emphasis on commercial/employment uses could curtail the overall redevelopment of the area due to viability issues. It is stated that it is not commercially viable to develop new offices of any significant scale at this location given its proximity to more suitable locations in the city centre and this is highly unlikely to change over the lifetime of the plan.

It is suggested that viability is addressed by the planning authority at the outset of the process of preparing the Ballyboggan LAP. It is considered that the delivery of new employment uses in the early phases of regeneration should not be a requirement of the LAP, as it will impact the viability of regeneration of this strategic landholding.

TU Dublin note that the area is heavily dominated by "big box" warehouse-type provision and encouraging a mix of employment opportunities will encourage development. Along with commercial office development, consideration should be given to encouraging some of the activities identified as lacking in the city development plan, such as practice space for artists and creatives, rehearsal space for performers and start-up space for younger companies. Adaptive reuse of the existing structures is both sustainable and good economic use.

TU Dublin highlights that they have a strong track record in entrepreneurship, but also in the performing and practice-based arts and would strongly support any such initiatives. Efforts should be made to protect some of the more diverse uses that have developed, such as rehearsal studios. Encouraging initial development in the lower-density areas will help preserve employment levels as the area evolves.

Chief Executive's Response

The issues raised in the submissions regarding the retention of traditional employment are acknowledged. It is the intention that the proposed draft LAP seeks to provide opportunities for the retention and growth of employment as part of regeneration. The proposed regeneration has the potential to create the conditions to create a diversity of job opportunities in the local area as part of mixed-use development. Employment provision will be a cornerstone of the LAP proposals and will be essential to deliver on the 15-minute city concept.

As part of the development of a mixed-use development framework, the proposed draft LAP will seek to provide the opportunity for existing businesses to remain in the area and/or to relocate or cluster within the LAP lands where appropriate. It is anticipated that any development framework developed would be residentially led and it is not anticipated at this time that the delivery of specific employment or residential quanta would be linked or pre-conditional to a phasing programme.

Chief Executive's Recommendation

Prepare an evidenced base economic viability assessment to support the preparation of the draft LAP.

Prepare a development framework that supports existing and new employment uses and growth as a cornerstone of mixed-use regeneration.

Develop a phasing plan and implementation plan that supports the retention and clustering of existing employment uses in the LAP lands.

Create a suitable balance between the need for a wide range of economic activities to be provided, while enabling the provision of higher-order activities as part of neighbourhoods of integrated mixed-use development.

2.2.4 Placemaking

Summary of Issues

Members of the Public

Sub No 5, 10, 15, 22, 24, 28, 29, 32, 37.

There is strong support for the creation of a least one public focal point in the development of the lands that would function as a village centre or heart of any regeneration. This could be in the form of a pedestrian public square or plaza with space for markets, events and cafes/outdoor seating, and typical village uses, well served by public transport.

Given the location of the LAP lands in the context of Glasnevin Cemetery, the National Botanical Gardens, the Royal Canal and the Tolka River, it is considered that great care must be taken to ensure a sympathetic scaling, height and design features of any proposed buildings. It is felt that the area has great potential to become a model of excellence for regeneration if properly planned by Dublin City Council.

A number of submissions from residents in the local area bounding the LAP lands such as the Claremont estate state that they have major concerns that any new development could negatively impact the security, privacy, noise levels and sunlight of their homes. It is clearly stated that residents will oppose any attempt to build high-rise developments near their homes. It is considered that high-rise structures of any description, particularly apartments, along the perimeter of existing residential estates would be inappropriate. Residents feel that any residential areas in the LAP must be low-rise (2-story max) where they are being developed near current residential areas on the boundary or perimeter.

A submission suggests that in order to protect the value and amenity of existing dwellings, the height of properties backing onto and overlooking these estates could be restricted to the heights of existing factories with the use of a separation distance and appropriate landscaping as a buffer between existing and proposed developments.

Landowners

Sub No 20, 25, 27, 33.

Submissions support place-making principles which centre on responding to the local context, existing and planned public transport infrastructure and connecting with the wider landscape through green links and corridors, as this will aid in the creation of an integrated and connected mixed-use community. Given the extent of the LAP lands, defining new development areas that are informed by the landscape structure and connected by a clear street hierarchy will prove helpful in guiding the future development of the LAP lands.

It is considered that the existing road infrastructure should be utilised to define the urban blocks as there is an established road network and no major new infrastructure is required. This will allow developments to be brought forward across the area without the need for new infrastructure.

It is highlighted that the indicative east-west strategic green link through the industrial area might not be advisable/achievable, noting the green infrastructure to the immediate north and south, and a tree-lined boulevard which has regard to existing road infrastructure might be more appropriate on the existing industrial lands.

Further considerations in respect of urban structure in the preparation of the LAP could be. The development of a Guiding Principles Map which indicates urban blocks as a strategic blueprint for the future development of the area.

- Identification of key opportunity sites that respond to the existing street and block structure.
- Identification of public open spaces and building frontages that will inform an urban design-led approach to the regeneration of this area.
- Introduction of permeability through the lands which utilises existing infrastructure/respects existing building plots.
- Engagement with landowners in the area to identify sites which may come forward for development in the short term.

In general, a variety of building heights across the LAP lands should be encouraged to avoid the proliferation of monolithic blocks and to provide a coherent urban structure which is legible and easily navigated. Building heights of 6 to 10 storeys are considered appropriate for the majority of the brownfield lands within the LAP area, with greater heights close to public transport facilities.

One submission notes that if existing industrial /enterprise owners or occupiers intend to remain in situ, they will require much taller buildings that currently exist with larger floor plates and greater internal heights (typically between 16-24 metres in height) necessary. Notwithstanding this, it is pointed out that low employment density uses would not be considered appropriate for such accessible lands.

TU Dublin state that a good flexible masterplan that can accommodate phased development will be crucial to success. Early success and delivery of amenities should be prioritised, even if at a moderate scale. Creating an initial heart of human scale, close to Luas/ Broombridge station should be considered, to create a critical mass of activities. A secondary local centre could evolve in time at the eastern part of the site.

A submission notes the LAP should support higher-density residential development in accordance with the Development Plan 2022-2028. Appendix 3 of the Development Plan acknowledges that a density range of 100-250 uph is appropriate for a SDRA. It is submitted that the highest residential densities should be located centrally, north of Broombridge rail and Luas stops, and on the eastern portion of the lands, which will be served by Bus Connects and noting that the entire LAP area has good access to the Royal Canal Greenway. Residents can travel by bike, foot and high-quality public transport to the City Centre / Docklands, and a range of other facilities in adjacent neighbourhoods, in accordance with the 15-minute city concept.

Chief Executive's Response

The Chief Executive acknowledges the issues raised by local residents regarding the nature and form of any future development that may be proposed in the vicinity of existing residential development. The Chief Executive would like to clarify that any development framework or urban structure that will be proposed as part of the draft LAP will conform with the Development Plan in terms of height and density and will be subject to further public consultation concerning detailed proposals and measures to protect established residential amenities. In relation to height, urban structure proposals will generally be informed by the following principles;

- Respecting existing context and established residential areas.
- Enhancing legibility and placemaking.
- Reinforcing urban function.

The Chief Executive notes the concerns of landowners regarding the development of an urban structure that must be capable of implementation and that should include realistic phasing proposals to ensure viability. Further detailed engagement will be carried out as part of the draft LAP preparations. The existing urban structure and land ownership will be considered as part of any new development framework proposed. However, the challenges regarding the delivery of the urban structure and other infrastructure cannot be overstated and it must acknowledge that this will require collaboration across landownership boundaries by all stakeholders.

Chief Executive's Recommendation

Carry out further detailed engagement with stakeholders to support the development of a robust urban structure to provide a framework to facilitate redevelopment opportunities, while ensuring that an overall cohesive vision is achieved for the lands.

Develop an urban structure that also includes phasing proposals to support short-term redevelopment proposals, that acknowledges land ownerships to support regeneration where possible, and also considers existing business operators.

2.2.5 Sustainable Movement and Access

Summary of Issues

Members of the Public

Sub No 2, 4, 9, 10, 13, 19, 24, 26, 28, 29, 32, 35, 36, 37, 38, 39.

A number of submissions raise the issues of traffic management and congestion in the existing road network. There is great concern that any new development in the LAP lands will place additional stress and load on already heavily congested routes. The point is made that where new housing development is proposed, there will be a need for new public and private transport infrastructure.

Submissions are supportive of additional rail, Luas and bus infrastructure and capacity. It is stated that bus capacity on existing routes is already insufficient. New transport capacity should be provided in time to serve any new development proposed. It is stated that new public transport services should also be developed within the LAP lands, with for example a shuttle bus to feed into the Luas at Broombridge. At present, Dublin Bus does not operate within the industrial areas.

There is support to limit car access in the regeneration and instead focus on creating pedestrian and cycle-only streets. Car access could be limited to the external perimeter only with specific routes determined for access to underground car parks and to facilitate occasional servicing of the new development (refuse collection, maintenance, etc.). East of Broombridge Road, Lagan Road could be realigned to link with Slaney Road which would create a main east/west route through the redeveloped lands.

There is strong support for safe, well-lit cycle and pedestrian facilities, and measures to minimise through traffic and fast traffic. There is support for greater access and use of the Royal Canal for pedestrian and cycle use. This could take the form of a linear park.

At present, it is stated that there is limited opportunity to cross the canal and rail line. A new pedestrian/cyclist bridge east of the Luas Depot would increase connectivity and integrate the area on either side of the canal. Improved walking and cycling infrastructure in the LAP area in general would be very desirable.

There is support for the use of some of the LAP lands to provide a park-and-ride facility that links to Broombridge Luas so that public transport is fully utilised. It is suggested that multi-storey parking could be used, with some floors below ground level, to promote greater Luas and train usage, etc.

Landowners

Sub No 20, 25, 27, 33.

Submission state that the LAP lands are well served by existing and proposed public transport and would be considered to be located in a 'Central and/or Accessible Urban Location,' as per the Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (December 2022). A submission from TU Dublin highlights that the proposed LAP benefits from good, and rapidly improving transport

infrastructure and that a local road network that allows easy access to bus and rail should be a feature of the masterplan.

Responding to the LAP lands proximity to existing rail, Luas and bus infrastructure at the Broombridge Interchange should be an integral component of the future LAP, to create sustainable, viable communities. In addition, the planned Luas green line extension to Finglas is a strong driver for compact growth and development across the LAP area.

Given the accessible nature of the lands, it is considered that the LAP should require limited car parking. For example, the City Edge Framework Plan seeks to provide limited or zero parking in appropriate locations along high-quality public transport corridors.

The creation of new dedicated pedestrian and cycle routes which integrate into the wider landscape and street network, and connect places and destinations is seen as key to the successful redevelopment of the LAP lands. While cycle infrastructure is good east-west along the canal, and the planned Luas extension will improve connectivity to the north, connectivity south to the city centre is poor. The Greater Dublin Cycle plan envisaged a cycle route connecting south, and consideration should be given as to how connectivity can be improved, connecting to a proposed improved route along Ratoath Road.

Chief Executive's Response

Many submissions have raised concerns concerning traffic and transportation matters. There is concern that the proposed urban structure will increase traffic congestion in the area. These concerns are reasonable and are acknowledged, however, it must also be acknowledged that the LAP lands are extremely well located in the context of proximity to existing and proposed public transportation infrastructure including Luas, proposed Luas Finglas, rail, Dart+ West, bus and BusConnects upgrades, as well as walking and cycling infrastructure. In particular, there will likely be major benefits from Luas Finglas with proposals for a large P&R at the M50. This is in addition to the clear benefits from BusConnects and Dart that will increase overall sustainable transport movement in the area.

It must be clarified from the outset that the LAP will not address traffic congestion in the wider area but rather will focus on the creation of a new urban area that maximises opportunities for walking, cycling and provides access to public transport. The future employees and residents of the LAP lands will have several viable sustainable alternatives to the private car as a primary means of transport in this respect. For example, it is proposed to significantly upgrade facilities and access to the canal towpath as part of the Royal Canal Greenway and Luas Finglas.

As set out previously in response to the submission from the National Transport Authority (NTA), the promotion of sustainable transport modes will be a key policy approach in the draft LAP. The draft LAP will align with the Transport Strategy for the Greater Dublin Area 2022-2042 and will be informed by the guiding principles for the integration of land use and transport set out in the RSES.

The Council will work proactively with the NTA in relation to the development of a Local Transport Plan to support the draft LAP. This will consider the existing context of the LAP

lands in the wider area, measures to support walking and cycling and permeability, and measures to manage car use and ownership in any new development proposals.

Chief Executive's Recommendation

The draft LAP shall be developed in accordance with the Transport Strategy for the Greater Dublin Area 2022-2042.

The draft LAP shall be informed by the development of local transport planning, in collaboration with the NTA, taking account of national and regional policy and guidance.

The Council will work proactively with the NTA in relation to the development of a Local Transport Plan to support the draft LAP.

2.2.6 Social, Cultural and Community Development

Summary of Issues

Members of the Public

Sub No 4, 9, 13, 28, 29, 31, 32, 35, 36, 37, 39.

Submissions highlight that such a major regeneration and potential increase in population in the area will require the necessity for the advance or parallel provision of essential and crucial community facilities and services e.g., medical centres, schools, child care facilities, efficient public transport etc, to ensure the creation of a sustainable community. The intensive development of residential units without the required ancillary services would inevitably lead to existing services coming under even greater pressure than is already the case.

Submissions support the provision of a universal community space that could function as a centre where workshops, talks, exhibitions, music concerts, ceremonies, and markets could function and where people can meet. There is strong support for the retention of local businesses that have developed in the existing estate and function as community facilities and places for social interaction for the wider community such as Keegan's or the Honest to Goodness Market.

Specific facilities or services mentioned in submissions include the need for a community centre, sports facilities, a swimming pool, premises for cafes and shops, green areas for people to relax and gather, a nursing home and medical facilities, spaces for clubs and evening classes, schools, childcare and play schools, a men's shed, and library and cultural centre.

Landowners

Sub No 20, 25, 33

One submission expresses reservations regarding the application of Objective CUO25 of the current Dublin City Development Plan, requiring 5% of floorspace for community, culture and artist floorspace for all new developments over 10,000 sq.m GFA. Whilst acknowledging that there is a need for social, community and cultural uses to support a residential-focused redevelopment of the area, it is submitted that the LAP should avoid this requirement as it adversely impacts the commercial viability of residential developments and also has

significant practical implications on completion of such developments in terms of finding suitable tenants, etc. It is considered that a financial contribution in lieu would be a more effective way to enhance cultural and community provision in the City, particularly within the LAP area.

It is submitted that the community and cultural needs of the area would be best addressed in a plan-led fashion by DCC, rather than via the dispersion of such uses across multiple individual developments. It is stated that a specific community, culture and arts venue for the LAP area could be provided on publicly owned lands in the LAP area, to be funded through a financial contribution in lieu, thereby providing innovative cultural/community floorspace in a suitable location, rather than in piecemeal in locations throughout the LAP area.

It is stated that the significant extent of Z15 zoned lands in the area, notably to the south-west, should be considered as part of the social and community infrastructure audit when factoring in the need for new schools to serve this regeneration area, as there may be opportunities to reutilise existing Z15 Institutional zoned lands for such uses.

It is stated that as well as providing critically required homes, the LAP area must also cater for the elderly and general community care, providing such facilities as a Transitional Care Facility. It is considered that the provision of such a facility within the LAP area would provide balanced and sustainable development along with the proposed new residential and commercial developments, ensuring all stages of the life cycle are catered for.

TU Dublin highlights that their facility at Broombridge currently supports sporting activities, both for students and local clubs. They are actively developing a proposal that will see increased levels of educational and enterprise activity on this site. The site development plan also includes proposals for additional sporting, recreational and social spaces, which could function as a local anchor of activity if delivered early with sufficient support. TU Dublin would also be keen to support entrepreneurial and artistic endeavours that complement their current activities.

Chief Executive's Response

Several submissions identify a range of community and social uses that are required. DCC will carry out a social and cultural audit to inform the development of the draft LAP. This shall include engagement with the Department of Education as well as other key stakeholders and providers.

The Chief Executive notes the points raised regarding the Objective CUO25 of the current Dublin City Development Plan, requiring 5% of floorspace for community, culture and artist floorspace for all new developments over 10,000 sq.m GFA. Whilst acknowledging the concerns expressed, the Chief Executive is clear that this Development Plan requirement will apply to the LAP lands. The Chief Executive welcomes further engagement on this issue, and it is emphasised that there will be a greater opportunity for a more tailored approach to respond to this objective if stakeholders work collaboratively to deliver redevelopment proposals in a coordinated and agreed way.

Chief Executive's Recommendation

To carry out a social and cultural audit to inform the development of the draft LAP and to inform future engagements with respect to the implementation of Objective CUO25 of the City Development Plan.

2.2.7 Landscape and Open Space

Summary of Issues

Members of the Public

Sub No 4, 9, 26, 29, 31, 34.

Submissions state that making new green spaces, with mixed-use areas of play, rest and recreation (community gardens/ allotments) will become increasingly important given the potential population and employment growth that could happen in the future. It is considered important to have sufficient green space/s and playground/s that families and crèches etc. can make use of.

Submissions highlight the importance of Reilly's Community Garden which is located beside the Ratoath Road Bridge. This amenity was launched in 2022 but is stated to have already become a key amenity for the area and community. It is seen as important to maintain and expand amenities like the Community Garden as part of the LAP.

Submissions highlight that it is important to recognise the environmental considerations of regeneration for the area and the need to take into the broader context of the area. A potential new village, while located in the centre of the new area might be placed midway between the natural habitats of the Royal Canal and that of the Tolka Valley with a strong connection between these two natural resources.

Landowners

Sub No 20, 21, 27, 30, 33.

Submission acknowledges the importance of creating a new green infrastructure strategy across the proposed LAP lands which responds to the local landscape designations (i.e., Tolka Valley Park and Royal Canal). Some submissions feel that it is considered that these spaces could provide an adequate quantum of large green spaces for the LAP area with each independent development providing further pockets of public open space on each site.

It is requested that LAP should make provision for public open space equitably across the plan area, having regard to land ownership and in consultation with landowners, as otherwise, the intended vision of the LAP may not be deliverable. It is stated that a general standard of 10% public open space within the lands to be provided flexibly by landowners, will provide greater certainty on delivery and maximise the regeneration potential of these brownfield lands. A flexible approach to the locations for public open space will also provide an incentive for landowners to work together to deliver redevelopment.

It is further requested that consideration is given to access to the Tolka Valley Park from the LAP lands, whether it is a priority pedestrian crossing across the road or a pedestrian footbridge across the road to the Park, thus providing direct links from the Park to the Canal and vice-versa.

It is considered that the Royal Canal presents a major opportunity to maximise the amenity, biodiversity and movement potential of the Royal Canal and deliver key connections and enhance accessibility and permeability, particularly in respect of existing and future public transport connections. It is stated that the canal front could be developed into a leisure area with seating and leisure and restaurant businesses.

Chief Executive's Response

The submissions received in relation to landscape or open space highlight the importance of existing or new open space or amenity in the development of the draft LAP lands and the formulation of a new urban structure. The Chief Executive notes the points raised regarding Reilly's Community Garden and welcomes further engagement in relation to the potential of this recently launched amenity.

It is the intention that the draft LAP strongly focus on unlocking the potential of the existing landscapes in the area such as Tolka Valley and Royal Canal as well as encouraging the creation of further potential areas for the provision of appropriate space for wildlife, nature and recreation as well as nature-based solutions to climate challenges.

In respect of future open space provision, the Chief Executive is of the view that unless there are particular extenuating circumstances, normal Development Plan standards will be applied. It is emphasised that there will be a greater opportunity for a more tailored approach to the nature, location and form of spaces provided if stakeholders work together to deliver redevelopment proposals in a coordinated and agreed way.

Chief Executive's Recommendation

Develop a green infrastructure and open space strategy to inform the development of the LAP urban structure. Such a strategy shall be informed by a Surface Water Management Strategy and a Strategic Flood Risk Assessment to be carried out as part of the draft LAP preparation.

2.2.8 Climate Action

Summary of Issues

Members of the Public

Sub No 17, 26, 29

A submission states that the majority of the food supply in Dublin City is brought in from areas outside of the region, such as its periphery, other areas of the country or, in the case of many fruits and vegetables, shipped in from abroad. A submission argues that this factor combined with the growing population and densification of the region, results in an increasing difficulty in sourcing food locally.

Section 3.5.5 of the Development Plan serves to outline the unsustainability of our agricultural and transport sector when it states that "data collected by the EPA indicates that the transport sector was responsible for 20.4% of total greenhouse gas emissions in 2019, second only to the agriculture sector." This reinforces the need for the provision of locally sourced and sustainably produced food in the region. For this reason, there should be a

much greater emphasis on agriculture and its associated issues and new solutions such as vertical farms.

A submission states that it should be possible to protect the Tolka River from pollution by harvesting rainwater with above-ground rainwater systems, using permeable pavements and enabling stormwater and surface runoffs to be absorbed by the ground instead of overflowing drains.

Landowners

Sub No 25

TU Dublin's submission states that a truly sustainable community would embrace the ideas of the 15-minute city. The excellent transport infrastructure provision makes this a possibility for the LAP area.

For a compact area such as this LAP, it is worth considering the provision of district heating infrastructure up-front in tandem with other basic services such as water and waste. This initiative also offers the chance to consider embodied energy. In some instances, adaptive reuse of existing structures should be supported (such as TU Dublin is proposing with the Broombridge warehouse).

Chief Executive's Response

The Chief Executive highlights that the draft LAP will be an implementation output of the recently adopted Dublin City Development Plan 2022-2028 and will be developed in alignment with the strategic policy approach to deliver a low carbon climate resilient city to create a more sustainable future based on the 15-minute city approach. Climate Action will therefore be an integral and cross-cutting theme through the draft LAP. Locally appropriate measures to support renewable energy and sustainable energy use and heating, etc will also be considered and set out in the plan where relevant.

Chief Executive's Recommendation

Ensure the draft LAP is informed by and consistent with the Climate Action and Low Carbon Development (Amendment) Act 2021 (Climate Act 2021) and the Climate Action Plan 2023 (CAP 2023).

Include climate action as an overarching and cross-cutting theme across the draft LAP in line with policies and objectives contained in the NPF, the RSES, the Dublin City Development Plan 2022-2028, Dublin City's Climate Change Action Plan and national legislation.

Include an urban greening strategy to promote a green public realm and to enhance biodiversity and amenity. There will be a key focus on maximising linkages to existing amenity areas and resources such as the Royal Canal and Tolka Valley Park. The incorporation of a greening strategy will support initiatives such as allotments/ community gardens and will prevent green infrastructure deficits in the future.

2.2.9 Phasing and Funding of Infrastructure

Summary of Issues

Members of the Public

Sub No 4, 29, 37

Submissions from members of the public wish that any development should be carried out in a co-ordinated and future-proofed manner to ensure minimal future disruption by road excavation or undergrounding pylons, etc with associated impacts in terms of noise, pollution and risk to wildlife in the area.

It is stated that flexible mixed-use zoning can help support the evolution of the lands. Early delivery of the LUAS extension, the Royal Canal Greenway and other proposed infrastructure will build confidence and draw investment. It is stated that phasing should consider the delivery of infrastructure, but also the density of employment. Maintaining employment while growing residential, commercial and social amenities should be a goal. The ultimate success of the development will be dependent on a good mix of each of these functions.

Landowners

Sub No 20, 25, 27, 30, 33.

A submission by TU notes that the area will be developed over several phases and as such, each phase should be tested to ensure that the intermediate stages are, in themselves, attractive places to live and work, and not dependent on the outcome of full plan implementation. It is stated that flexible mixed-use zoning can help support the evolution of the lands. Early delivery of the LUAS extension, the Royal Canal Greenway and other proposed infrastructure will build confidence and draw investment. It is stated that phasing should consider the delivery of infrastructure, but also the density of employment. Maintaining employment while growing residential, commercial and social amenities should be a goal. The ultimate success of the development will be dependent on a good mix of each of these functions.

Further submissions state that due to the multiple landowners throughout the LAP lands, it is important that any phasing detailed is as flexible as possible to allow the lands that are vacant/underutilised to be developed as soon as possible. For a time, industrial and logistics uses, and other mixed uses will sit side-by-side whilst simultaneously facilitating the compact and sustainable growth of underutilised sites in the area. As demonstrated in Sandyford Industrial Estate, new residential and mixed-use development can sit side-by-side and successfully assimilate into their surrounding context.

Further submissions acknowledge that landownership within the existing industrial estate is fragmented and as such a flexible approach to phasing and the delivery of new development within the proposed LAP lands will need to be implemented. It is suggested that the southern portion of the estate lands, which are most proximate to the Broombridge Public Transport Interchange, constitute an ideal starting point for the sequential redevelopment and regeneration of the proposed LAP lands.

It is submitted that DCC should consider whether the LAP procedure or the proposed Urban Development Zone (UDZ) procedure under the Land Value Sharing and Urban Development Zone Bill 2023, should be utilised having regard to the particular circumstances of the landbank and the opportunities presented by the LVS and UDZ Bill. It is submitted that the

proposed UDZ procedures and powers are tailor-made for urban regeneration sites such as the Dublin Industrial Estate.

As regeneration will span several development plan periods given the extent of the LAP area, it is critically important that the initial phases of development include lands in respect of which there is sufficient certainty that the lands can be released, and that can deliver urban structuring, movement and amenity elements that act as a catalyst for development in the area.

It is considered the Planning Authority must be cognisant of preparing a LAP which provides a framework for redevelopment, facilitates, and promotes regeneration, and avoids inadvertently creating obstacles (i.e., primarily due to phasing or infrastructural requirements which impede individual landowners) to the delivery of the vision on time.

Phasing requirements should be flexible and reflect the availability of sites to come forward for redevelopment over the lifetime of the LAP to facilitate the delivery of high-quality residential development with supporting open space, community/social and local employment uses. The LAP should be designed to avoid ransom strip-type situations or for development proposals to be dependent on other landowners or be dependent on substantial new infrastructure, all of which can be a significant constraint on actually delivering development and regeneration in the short term.

Chief Executive's Response

The Chief Executive acknowledges the concerns raised, both regarding the need for phasing arrangements to ensure coordinated implementation, as well as the potential for poorly developed phasing to critically impact the viability of potential redevelopment.

It is proposed that a phasing plan will be developed to accompany the draft LAP where the intention will be to enable redevelopment where this can be done in a coordinated and reasonable manner, and subject to normal infrastructure requirements and any necessary upgrades. This will be a significantly challenging area. It must be acknowledged that in certain instances, such as the provision of access roads and open spaces, etc that may not always follow ownership boundaries, that collaboration will be required to provide a rational and structured urban form. It is further noted that some landowners may not be in a position to bring forward development, or may wish to retain their existing operations, and any phasing plan will need to consider this.

The Chief Executive would like to clarify that existing employers and established uses will be supported as the LAP lands transition from a manufacturing / industrial focus towards a more mixed-use development. The urban structure design that will be proposed as part of the draft LAP will seek to minimise conflict between established commercial uses and future development sites.

Chief Executive's Recommendation

To include a phasing and implementation plan as a key component of the draft LAP, to ensure the viability of development proposals.

2.2.10 Site-Specific Issues

Summary of Issues

Sub No 8, 20, 21, 23, 25, 27, 30, 33.

A number of submissions were received from landowners or their representatives on the LAP pre-draft consultation. General issues raised by landowners are dealt with under the appropriate thematic sections above. More detailed or site-specific matters are noted and acknowledged below. Submissions were received from the following landowners/ stakeholders.

- Brady Shipman Martin on behalf of Hibernia Real Estate Group Limited (HREG)
- Thornton O'Connor for Bartra Property (Broombridge)
- Redlock Limited
- Kimpton Vale Limited
- TU Dublin
- Hughes Planning for Woodberry Printing Limited
- Declan Brassil & Co. Limited for Prevalent Investments Limited
- John Spain on behalf of Blacklion Real Estate Fund

Hibernia Real Estate Group Limited (HREG)

Hibernia Real Estate Group Limited (HREG) own lands within the identified proposed boundary of the Ballyboggan LAP. The HREG Lands contain a mix of current uses. The main HREG site sits at the main access point to the current Dublin Industrial Estate from the Old Finglas Road and provides for the primary frontage along this road, which is a key transport corridor.

It is stated that the HREG site has the potential to act as a gateway to the Ballyboggan LAP lands, and unlike many of the landholdings across the LAP area, provides for a large piece of land in single ownership which could be developed in the first phase of any plan. The HREG site has limited adjoining existing residential development and as such would be suitable for an increased density of development.

Bartra Property (Broombridge)

Bartra Property (Broombridge) are landholders of lands located in the vicinity of Broombridge rail station, adjacent to the Royal Canal. It is stated that given the site's location adjacent to the highest quality public transport and its position fronting the amenity of the Royal Canal, the lands are ideally situated to the provision of higher density mixed-use developments as would be facilitated under a Z14 zoning, overall representing a more efficient and sustainable use of land.

Redlock Limited

A submission made by Redlock Limited confirms that they own five properties in Dublin Industrial Estate and that if the area is re-zoned, they plan to undertake redevelopment work within 2-5 years. Rezoning is stated to be favoured because the buildings in the estate are outdated and need redevelopment, the estate is close to the city centre, the estate is surrounded by many existing and future transport links and because the estate is close to many hospitals, universities and schools.

Kimpton Vale Limited

A submission by Kimpton Vale Limited states that they are a company with 'interest' in developing landholdings in the proposed LAP area and welcome the regeneration of these underutilised lands, which are one of the best-served areas by public transportation in Dublin City. They agree that rejuvenating Dublin Industrial Estate and environs will only serve to provide much-needed housing close to the city in a more environmentally conscious setting whilst enabling local communities and businesses to thrive.

TU Dublin

TU Dublin strongly welcomes a plan-led approach to the development of these strategic lands and the opportunity to contribute at this non-statutory stage. The TU Dublin site at Broombridge currently supports sporting activities, both for students and local clubs. TU Dublin is actively developing a proposal that will see increased levels of educational and enterprise activity on the Broombridge site. The site development plan also includes proposals for additional sporting, recreational and social spaces, which could act as a local anchor of activity if delivered early with sufficient support. TU Dublin would also like to explore how the site sits in the local context, with access currently "hidden" down a side road. As noted above TU Dublin would also be keen to support entrepreneurial and artistic endeavours that complement current activities.

Woodberry Printing Limited

Woodberry Printing Limited is the current owner and operator of Colorman (Ireland) Ltd with premises located on the southern end of the Dublin Industrial Estate. It is stated that the overall Colorman site comprises a considerable area of 2.42 hectares and represents an ideal starting point for the regeneration of the southern portion of the Dublin Industrial Estate, given its prominent corner location, interfacing the Royal Canal and Broombridge DART and Luas terminals. Colorman Ireland has actively been exploring alternative greenfield sites which may prove more suitable for the needs of the company moving forward. Woodberry

Printing believes the optimal land-use zoning for the site is 'Z14 – Strategic Development and Regeneration Areas', the objective associated with which is to 'seek social, economic and physical development and/or regeneration of an area with mixed-use, of which residential would be the predominant use.

Prevalent Investments Limited

It is stated that Prevalent controls a site that is strategically located, is accessible and available for release in an early phase of development and can enable and deliver key elements of urban structuring, movement and amenity infrastructure in a first or early phase for the benefit of the wider landbank. The site extends to approximately 1.26 ha located within the proposed area of the LAP area, bounded to the north by Moyle Road, to the south by the Royal Canal, and to the east by a pedestrian access route to the Royal Canal and to the west by established commercial uses. The inclusion of the Prevalent site in an early phase of development would facilitate the delivery of critical elements of an effective regeneration strategy for the LAP lands:

Blacklion Real Estate Fund

Blacklion Real Estate Fund is the stated owner of several properties within Dublin Industrial Estate and wishes to be considered as a key stakeholder for the engagement process in respect of the LAP preparation. They consider that a Z1 residential zoning would provide an appropriate development framework. However, should Z1 not be considered appropriate, it is submitted that the area should be rezoned Z14 Strategic Development and Regeneration Areas (SDRAs) with the objective 'To seek the social, economic and physical development and/or regeneration of an area with mixed-use, of which residential would be the predominant use.

Chief Executive's Response

The Chief Executive acknowledges the submissions made by landowners and welcomes the further detailed engagement of the issues raised before the development of the draft LAP.

Chief Executive's Recommendation

To continue to consult and meet with all relevant stakeholders up to the publication of a draft LAP.

3.0 CONCLUSION

All submissions received have been reviewed. All relevant planning issues raised will be taken into consideration in the preparation of the draft LAP. The key themes identified will be important in the preparation of the draft LAP. All submissions remain available for inspection and review by the public at www.dublincity.ie. It should be noted that receipt and analysis of these submissions will inform the preparation of the pre-draft LAP.

The LAP team will continue to consult and meet with all relevant stakeholders and state bodies up to the publication of a draft LAP. These meetings will seek to achieve a balance and consensus in progressing policies and action on the issues raised during the Issues Paper consultation and having regard to the proper planning and sustainable development of the area.

It is the intent of the Council to review the future zonings of the land as the draft LAP is developed; and to propose a variation at the appropriate time.

Brownfield regeneration by its very nature is complex and often takes many years to fully implement. DCC will continue to support existing businesses within the area; and as part of this regeneration will work with all landowners to ensure that any future regeneration by owners who wish to redevelop integrates with existing operators. The draft LAP will support this approach and will establish a phasing and implementation strategy that responds to this.

Appendix 1: List of Submissions Received (with reference number).

- 1 Office of Public Works
- 2 Kevin Griffiths
- 3 Department of Education
- 4 Sonya Wilson
- 5 Cathal Melinn
- 6 Brian Stafford
- 7 Irish Water
- 8 Pauline Byrne, BSM for Hibernia Real Estate Group Limited (HREG)
- 9 Christina Krug
- 10 Wayne Kearns
- 11 TII
- 12 NTA
- 13 Justin Mason
- 14 Department of the Environment, Climate and Communications
- 15 Edward McKiernan
- 16 Adriana Nistorescu
- 17 Cian McDonnell
- 18 Office of the Planning Regulator
- 19 Thomas Legg
- 20 Thornton O'Connor for Bartra Property (Broombridge) Ltd
- 21 Redlock Limited
- 22 Micheal Halton
- 23 Sean Keegan
- 24 Thomas Cooke
- 25 Technological University Dublin
- 26 Reilly's Community Garden
- 27 Hughes Planning for Woodberry Printing Ltd
- 28 Paul Cooke
- 29 Stephen Mernagh
- 30 Declan Brassil & Co. Ltd for Prevalent Investments Ltd
- 31 Jane Macaulay
- 32 Mary Tspon
- 33 John Spain on behalf of Blacklion Real Estate Fund
- 34 John Paul O'Grady
- 35 Frank Gallen

- 36 Alan Cooke
- 37 Michael Rownan
- 38 Peter Fay
- 39 Gayle Ralph FG Local Area Representative
- 40 Department of Housing, Local Government and Heritage

Appendix 1(a): List of Submissions Received (with reference numbers).

Submission No.	Submission type	Name	ID
1	Organisation	Office of Public Works	DCC-C48-BLAP-1
2	An individual	Kevin Griffiths	DCC-C48-BLAP-2
3	Organisation	Department of Education	DCC-C48-BLAP-3
4	An individual	Sonya Wilson	DCC-C48-BLAP-4
5	An individual	Cathal Melinn	DCC-C48-BLAP-5
6	An individual	Brian Stafford	DCC-C48-BLAP-6
7	Organisation	Irish Water	DCC-C48-BLAP-7
8	Organisation	Pauline Byrne, Brady Shipman Martin for Hibernia Real Estate Group Limited (HREG)	DCC-C48-BLAP-8
9	An individual	Christina Krug	DCC-C48-BLAP-9
10	An individual	Wayne Kearns	DCC-C48-BLAP-10
11	Organisation	TII	DCC-C48-BLAP-11
12	Organisation	NTA	DCC-C48-BLAP-12
13	An individual	Justin Mason	DCC-C48-BLAP-13
14	Organisation	Department of the Environment, Climate and Communications	DCC-C48-BLAP-14
15	An individual	Edward McKiernan	DCC-C48-BLAP-15
16	An individual	Adriana Nistorescu	DCC-C48-BLAP-16
17	An individual	Cian McDonnell	DCC-C48-BLAP-17
18	Organisation	Office of the Planning Regulator	DCC-C48-BLAP-18
19	An individual	Thomas Legg	DCC-C48-BLAP-19
20	Organisation	Thornton O'Connor for Bartra Property (Broombridge) Ltd	DCC-C48-BLAP-20
21	Organisation	Redlock Limited	DCC-C48-BLAP-21
22	An individual	Micheal Halton	DCC-C48-BLAP-22
23	Organisation	Sean Keegan for Kimpton Vale Ltd	DCC-C48-BLAP-23
24	An individual	Thomas Cooke	DCC-C48-BLAP-24
25	Organisation	Technological University Dublin	DCC-C48-BLAP-25
26	Organisation	Reilly's Community Garden	DCC-C48-BLAP-26
27	Organisation	Hughes Planning for Woodberry Printing Ltd	DCC-C48-BLAP-27
28	An individual	Paul Cooke	DCC-C48-BLAP-28
29	An individual	Stephen Mernagh	DCC-C48-BLAP-29
30	Organisation	Declan Brassil & Co. Ltd for Prevalent Investments Ltd	DCC-C48-BLAP-30
31	An individual	Jane Macaulay	DCC-C48-BLAP-31
32	An individual	Mary Tspon	DCC-C48-BLAP-32

Submission No.	Submission type	Name	ID
33	Organisation	John Spain on behalf of Blacklion Real Estate Fund	DCC-C48-BLAP-33
34	An individual	John Paul O'Grady	DCC-C48-BLAP-34
35	An individual	Frank Gallen	DCC-C48-BLAP-35
36	An individual	Alan Cooke	DCC-C48-BLAP-36
37	An individual	Michael Rownan	DCC-C48-BLAP-37
38	An individual	Peter Fay	DCC-C48-BLAP-38
39	An individual	Gayle Ralph FG Local Area Representative	DCC-C48-BLAP-39
40	Organisation	Department of Housing, Local Government and Heritage	DCC-C48-BLAP-40

Appendix 2: Proposed Draft LAP Boundary

