

To the Lord Mayor and
Members of Dublin City Council

Report No.142/2023
Report of Assistant Chief Executive



**Draft Jamestown Masterplan
Chief Executive's Report on the Submissions Received during the Public
Consultation Process for the Draft Masterplan**

June 2023

Contents

1.0 Introduction	1
1.1 Format of report	1
1.2 Public Consultation Programme	1
1.3 Strategic Environmental Assessment (SEA), Appropriate Assessment (AA and Strategic Flood Risk Assessment (SFRA)	2
1.4 Next Steps	3
2.0 Submissions Received	3
2.1 List of submissions received	4
2.2 Summary of issues raised by prescribed bodies / state agencies and the Chief Executive's response and recommendations	13
2.2.1 Office of the Planning Regulator	13
2.2.2 Land Development Agency	13
2.2.3 DAA	16
2.2.4 Transport Infrastructure Ireland	16
2.2.5 Uisce Éireann - Irish Water	17
2.2.6 Fingal County Council	18
2.2.7 Electricity Supply Board	19
2.2.8 Department of Education	20
2.2.9 National Transport Authority	24
2.3 Summary of issues raised by members of the public / interested parties, by chapter and theme and the Chief Executive's response and recommendations	28
2.3.1 Introduction & Vision	28
2.3.2 Urban Structure	31
2.3.3 Green Infrastructure & Open Space	35
2.3.4 Urban Form & Design	39
2.3.5 Land Use & Function	44
2.3.6 Phasing & Sequencing	52
2.3.7 Issues raised by theme	61
3.0 Conclusion	68

1.0 Introduction

Dublin City Council (DCC) has prepared a draft Masterplan for circa 43 hectares of industrial lands situated between Jamestown Road, McKee Avenue and St Margaret's Road, Finglas, Dublin 22 (the draft Jamestown Masterplan) pursuant to the requirements of SDRA 3 of the Dublin City Development Plan 2022-2028 (the Development Plan).

The draft Masterplan translates the high-level guiding principles contained within SDRA 3 of the Development Plan to ensure an integrated urban design-led solution to the re-development of the lands. The draft Masterplan is given statutory effect by SDRA 3 of the Development Plan.

1.1 Format of report

The purpose of this report is to present the Chief Executive's response to the issues raised in the submissions/observations received during the public consultation process carried out on the draft Jamestown Masterplan and, where relevant, to make recommendations on amendments to the draft Masterplan, as appropriate. The issues raised by prescribed bodies and state agencies are summarised individually. All other issues are generally categorised in accordance with the chapters in the draft Masterplan. Other issues raised are addressed thematically.

Any minor typographical errors or discrepancies, including references to any plans, policy documents or supporting documentation that have been updated will be amended in the final Masterplan.

Recommendations for amendments to the draft Masterplan are shown by way of bold green and underlined text. Recommendations for deletion are shown in bold red text with strike through.

To assist those utilising a screen reader:

Amendments are enclosed with brackets with the following format: **{amendment}**

Deletions are enclosed with brackets with the following format: **~~(deletion)~~**

Please note, if you are using a screen reader, the level of punctuation may need to be amended throughout the text in order to identify these brackets correctly.

1.2 Public Consultation Programme

The draft Masterplan was initially placed on public display for 4 weeks from 27th March to 24th April 2023 (both dates inclusive) and was extended to 15th May 2023 (a total period of 7 weeks). During this time, members of the public and interested parties were invited to make comments and suggestions to help enhance the Masterplan. Information on the draft Masterplan and environmental reports (Strategic Environmental Assessment (SEA) Screening Report, Appropriate Assessment (AA) Screening Report, and Strategic Flood Risk Assessment (SFRA)) were disseminated to the public as follows:

- A briefing was held with Elected Members from the North West Area on 21st March 2023, in advance of the commencement of the public consultation process.
- A briefing was held with landowners on 23rd March 2023 at the Ballymun Civic Centre.
- Letters that provided notification of the draft Jamestown Masterplan consultation programme and an invitation for submissions were distributed to, inter alia, the Minister for Housing, Local Government and Heritage, and relevant prescribed authorities.

- Notification of the display of the Draft Jamestown Masterplan and Environmental Reports for public consultation was placed in the Irish Independent on 27th March 2023 with information on the public consultation programme and an invitation for submissions.
- A copy of the Draft Jamestown Masterplan together with the accompanying Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) screening reports and determinations and Strategic Flood Risk Assessment (SFRA) was displayed at:
 - the offices of Dublin City Council, Ground floor, Block 4, Civic Offices, Wood Quay, Dublin 8 during public opening hours, Monday – Friday 9.00 am to 4.30pm, (excluding Bank Holidays)

and

- at the Dublin City Council Finglas Area Office, Finglas Civic Centre, Mellows Road, Finglas, Dublin 11, during public opening hours.
- Members of Dublin City Council staff were available for two public drop-in sessions to discuss and explain the process for making the Masterplan and to assist with any queries in relation making a submission on:
 - Thursday 13th April, from 6pm to 8pm at the Finglas Civic Centre, Mellows Road.

and

- Friday 14th April, from 10am to 12 noon, at the Finglas Civic Centre, Mellows Road.
- Local residents' associations were emailed about the consultation process via the Finglas area office.
- DCC's Public Participation Network (PPN), was also notified of the consultation.
- Throughout the consultation period, a number of queries and clarifications were responded to via the localareaplan@dublincity.ie email address, to assist members of the public in making a submission.
- Submissions were invited by one of two options:
 - Online via the DCC consultation portal.
 - By post.

The final date for the receipt of all submissions was 4.30 pm on 15th May 2023.

The planning process is an open and public one. In that context, all submissions/observations are a matter of public record and were placed on the City Council's consultation portal. The Planning Authority reserves the right to redact any submission or part thereof that contains vexatious, libellous or confidential information, including confidential information in relation to a third party (in respect of which the third party has not, expressly, or impliedly in the circumstances, consented to its disclosure).

1.3 Strategic Environmental Assessment (SEA), Appropriate Assessment (AA and Strategic Flood Risk Assessment (SFRA)

In accordance with the SEA Directive (2002/42/EC) and the provisions of Schedule 2A of the Planning and Development (Strategic Environmental Assessment) (SEA) Regulations 2004-2011 (the SEA Regulations), SEA screening has been carried out. DCC as the competent authority has determined that the draft Masterplan would not likely have a significant effect on the environment and that SEA is not required in respect of the draft Masterplan.

A screening for Appropriate Assessment (AA) was carried out having regard to Article 6(3) of the Habitats Directive. DCC as the Competent Authority has determined that the draft Masterplan, individually, and in combination with other plans and projects, does not have the potential to give rise to likely significant effects on the Special Conservation Interests / Qualifying Interests and their respective Conservation Objectives of any Natura 2000 site, and does not require an Appropriate Assessment.

A Strategic Flood Risk Assessment (SFRA) was prepared and informed the draft Jamestown Masterplan.

The prescribed bodies were notified of the above determinations concerning SEA and AA, in advance of the publication of the draft Masterplan and no objections to the conclusions were received within the appropriate period.

Any material amendments that may be made to the draft Masterplan will be subject to further screening for SEA and AA prior to the finalisation of the final Masterplan. DCC as the competent authority will publish final determinations on the requirement for SEA and AA upon the publication of the final Masterplan.

1.4 Next Steps

A Chief Executive's Report on the submissions received during the public consultation process is hereby submitted to the Elected Members of DCC for consideration.

While the Jamestown Masterplan will be given statutory effect by SDRA 3 of the Development Plan, the process of making the Masterplan is non-statutory. Therefore, there are no statutory timeframes set out in the Planning and Development Act 2000 (as amended) for considering this Chief Executive's Report. The Chief Executive intends for the Report to be considered and the draft Masterplan to be agreed at the City Council Meeting in July 2023.

Following this, the Chief Executive intends to commence a Variation to the Dublin City Development Plan 2022-2028, to update SDRA 3 by incorporating the Jamestown Masterplan.

2.0 Submissions Received

A total of 244 submissions were received by DCC during the consultation period. Several responses contained no written submission or observation. DCC followed up with the respective individuals but no responses were forthcoming. Some duplicate submissions were submitted. For clarity these are listed in table 1 below. The purpose of this report is to briefly summarise the **issues** raised in these submissions and present the Chief Executive's response and recommendation. Those issues raised by prescribed bodies or state agencies are summarised individually in section 2.2, while all other submissions are summarised in section 2.3 grouped in accordance with each chapter of the draft Masterplan and under various topics/themes.

2.1 List of submissions received

The following persons or bodies made submissions or observations, listed in the order received.

Table 1: List of Submissions

Submission No.	Submission type	Name	Citizen Response ID	Space
1	An individual	Robert Shaw	ANON-AANH-QJT9-Z	
2	An individual	Aoife Hill	ANON-AANH-QJTY-Z	
3	An individual	Declan	ANON-AANH-QJTP-Q	
4	An individual	Proinsias Mac Fhlannchadha	ANON-AANH-QJTB-9	
5	An individual	Christopher Maher	ANON-AANH-QJTN-N	
6	An individual	Conal Mc Donald	ANON-AANH-QJTE-C	
7	An individual	William Lawlor	ANON-AANH-QJT6-W	
8	An individual	Will Roche	ANON-AANH-QJTQ-R	
9	An individual	Kevin Hardiman	ANON-AANH-QJTA-8	
10	An individual	Erika Dalnoky-Simon	ANON-AANH-QJTC-A	
11	An individual	Barry Whyte	ANON-AANH-QJTF-D	
12	An individual	John	ANON-AANH-QJTW-X	
13	An individual	Leona Shaw	ANON-AANH-QJTM-M	
14	An individual	Ray	ANON-AANH-QJTS-T	
15	An individual	Gerard Ryan	ANON-AANH-QJTG-E	
16	An individual	Grace Donoghue	ANON-AANH-QJTU-V	
17	An individual	Ian Staunton	ANON-AANH-QJQT-R	
18	An individual	Ceire Swan	ANON-AANH-QJQ1-N	
19	An individual	Barbara Hanlon	ANON-AANH-QJQV-T	
20	An individual	Stephen Moorhouse	ANON-AANH-QJQY-W	
21	An individual	Fiona Byrne	ANON-AANH-QJQP-M	
22	An individual	Becki Greene	ANON-AANH-QJQB-6	
23	An individual	Sarah Harris	ANON-AANH-QJQN-J	
24	An individual	Joe O'Connor	ANON-AANH-QJQ2-P	
25	An individual	Cristina Mihaela Bolohan	ANON-AANH-QJQQ-N	

Submission No.	Submission type	Name	Citizen Response ID	Space
26	An individual	John Richard Illingworth	ANON-AANH-QJQX-V	
27	An individual	Paul Hayes	ANON-AANH-QJQA-5	
28	An individual	Marie	ANON-AANH-QJQC-7	
29	An individual	Kelly Family	ANON-AANH-QJQZ-X	
30	An individual	Ciarán Pringle	ANON-AANH-QJQF-A	
31	An individual	Ellen Mac Carthy	ANON-AANH-QJQR-P	
32	An individual	Cathal Melinn	ANON-AANH-QJQJ-E	
33	An individual	Claire King	ANON-AANH-QJQ3-Q	
34	An individual	Nicole Donnelly	ANON-AANH-QJQW-U	
35	An individual	Kenneth	ANON-AANH-QJQ7-U	
36	An individual	Fred Richardson	ANON-AANH-QJQH-C	
37	An individual	Elisha kelly	ANON-AANH-QJQK-F	
38	An individual	Julie	ANON-AANH-QJQU-S	
39	An individual	Tracy	ANON-AANH-QJQG-B	
40	An individual	Gillian Brennan	ANON-AANH-QJ39-Y	
41	An individual	C Behan	ANON-AANH-QJ31-Q	
42	An individual	Patrick Hubbard	ANON-AANH-QJ3Y-Y	
43	An individual	Roisin	ANON-AANH-QJ3P-P	
44	An individual	Christine Kelly	ANON-AANH-QJ3T-T	
45	An individual	William Ryan	ANON-AANH-QJ3B-8	
46	An individual	Peter Haverty	ANON-AANH-QJ3N-M	
47	An individual	David Kehoe	ANON-AANH-QJ3E-B	
48	An individual	S Fennell	ANON-AANH-QJ3D-A	
49	An individual	Paul Carey	ANON-AANH-QJ36-V	
50	An individual	Artemio Felicisimo B. Salvador	ANON-AANH-QJ35-U	
51	An individual	Ciara Wickham	ANON-AANH-QJ3Q-Q	
52	An individual	Mark Cullen	ANON-AANH-QJ3X-X	
53	An individual	Sarah tynan	ANON-AANH-QJ3C-9	

Submission No.	Submission type	Name	Citizen Response ID	Space
54	An individual	Greg Rooney	ANON-AANH-QJ3F-C	
55	An individual	Stephen Rooney	ANON-AANH-QJ3R-R	
56	An individual	Marie Prunty	ANON-AANH-QJ33-S	
57	An individual	Michelle Mangan	ANON-AANH-QJ34-T	
58	An individual	Emma	ANON-AANH-QJ3W-W	
59	An individual	Alicia	ANON-AANH-QJ37-W	
60	An individual	Louise	ANON-AANH-QJ3M-K	
61	An individual	Denise Bowe	ANON-AANH-QJ3H-E	
62	An individual	Joyce Rooney	ANON-AANH-QJU9-1	
63	An individual	Amanda launders	ANON-AANH-QJU1-S	
64	An individual	Antoinette Morley	ANON-AANH-QJ3K-H	
65	An individual	Lisa ODonovan	ANON-AANH-QJUV-X	
66	An individual	Ian Nash	ANON-AANH-QJUY-1	
67	An individual	Aoife Newman	ANON-AANH-QJUB-A	
68	A group	Cedarwood resident association (Road,Park and Ave)	ANON-AANH-QJUN-P	
69	An individual	Denise	ANON-AANH-QJU2-T	
70	An individual	Glenn Ivory	ANON-AANH-QJU6-X	
71	An individual	Niambh Scullion	ANON-AANH-QJU5-W	
72	An individual	Zack Brennan	ANON-AANH-QJUX-Z	
73	An individual	Sarah Mooney	ANON-AANH-QJUC-B	
74	An individual	Ciara	ANON-AANH-QJUA-9	
75	A group	Cedarwood resident association (Road,Park and Ave)	ANON-AANH-QJU8-Z	
76	A group	Mary McGovern	ANON-AANH-QJUJ-J	
77	An individual	Paul Flanagan	ANON-AANH-QJU4-V	
78	An individual	Patricia Byrne	ANON-AANH-QJUW-Y	
79	An individual	William Purcell	ANON-AANH-QJUM-N	
80	A group	Robert Shaw	ANON-AANH-QJUS-U	

Submission No.	Submission type	Name	Citizen Response ID	Space
81	An organisation	Land Development Agency	ANON-AANH-QJUG-F	
82	An individual	Tanya Warren	ANON-AANH-QJUK-K	
83	An individual	Stephen Carroll	ANON-AANH-QJ2V-U	
84	An individual	Bryan Hanna	ANON-AANH-QJ2P-N	
85	An individual	Grainne Kinsella	ANON-AANH-QJ2B-7	
86	An individual	Elaine	ANON-AANH-QJ2E-A	
87	An individual	Paul Tighe	ANON-AANH-QJUD-C	
88	An organisation	An Post	ANON-AANH-QJ28-W	
89	An individual	Liz Lawler	ANON-AANH-QJ26-U	
90	An individual	Liam O'Donovan	ANON-AANH-QJ25-T	
91	A group	Hayes	ANON-AANH-QJ2X-W	
92	An individual	Stephen C	ANON-AANH-QJ2A-6	
93	An individual	Jonathan Costello	ANON-AANH-QJ2C-8	
94	An individual	Graham O Duil	ANON-AANH-QJ2Z-Y	
95	An individual	Nicola Courage	ANON-AANH-QJ2F-B	
96	An individual	Michael Glynn	ANON-AANH-QJ2R-Q	
97	An individual	Dee	ANON-AANH-QJ2J-F	
98	An individual	Maria Fernandez O'Donnell	ANON-AANH-QJ23-R	
99	An individual	James Keane	ANON-AANH-QJ24-S	
100	An individual	James Higgins	ANON-AANH-QJ2W-V	
101	An individual	Gary Healy	ANON-AANH-QJ27-V	
102	An individual	Jason King	ANON-AANH-QJ2S-R	
103	An individual	Laura Moher	ANON-AANH-QJ2H-D	
104	An individual	Colette	ANON-AANH-QJ2U-T	
105	An individual	J Connolly	ANON-AANH-QJ71-U	
106	An individual	Paul Tighe	ANON-AANH-QJ79-3	
107	An organisation	Ireland TAM Dublin Property s.a.r.l.	ANON-AANH-QJ7Y-3	
108	An individual	Niall Pringle	ANON-AANH-QJ7B-C	

Submission No.	Submission type	Name	Citizen Response ID	Space
109	An individual	Tony O Donnell	ANON-AANH-QJ7E-F	
110	An organisation	daa plc	ANON-AANH-QJ78-2	
111	An individual	Monica Hempenstall	ANON-AANH-QJ7D-E	
112	An individual	Dermot Johnson	ANON-AANH-QJ75-Y	
113	An individual	Noel Mulvey	ANON-AANH-QJ7Q-U	
114	An organisation	Transport Infrastructure Ireland (TII)	ANON-AANH-QJ7X-2	
115	An individual	Joe	ANON-AANH-QJ7A-B	
116	An individual	M Johnston	ANON-AANH-QJ7C-D	
117	An individual	Damien Smith	ANON-AANH-QJ7Z-4	
118	An individual	Stephen Albert John Desmond	ANON-AANH-QJ7F-G	
119	An individual	Sinead	ANON-AANH-QJ7R-V	
120	An individual	Adrez Limited	ANON-AANH-QJ7J-M	
121	An individual	Lorna Walsh	ANON-AANH-QJ73-W	
122	An individual	Kevin Meaney	ANON-AANH-QJ74-X	
123	An individual	L Chambers	ANON-AANH-QJ7W-1	
124	An individual	Valerie Murphy	ANON-AANH-QJ77-1	
125	An individual	Stephen Poynton	ANON-AANH-QJ7H-J	
126	An individual	Debbie brannigan	ANON-AANH-QJ7G-H	
127	An individual	Stephen Poynton	ANON-AANH-QJ7K-N	
128	An individual	Pamela Lawlor	ANON-AANH-QJX1-V	
129	An individual	McEvoy Family	ANON-AANH-QJX9-4	
130	An individual	Collette Johnson	ANON-AANH-QJXY-4	
131	An individual	Anne Poynton	ANON-AANH-QJ7U-Y	
132	An individual	Keith Loughman	ANON-AANH-QJXP-U	
133	An individual	Aoife Fenton	ANON-AANH-QJXE-G	
134	An individual	Geraldine Loughman	ANON-AANH-QJXN-S	
135	An individual	Tracey Haverty	ANON-AANH-QJX2-W	
136	An individual	Anne Byrne	ANON-AANH-QJ7M-Q	

Submission No.	Submission type	Name	Citizen Response ID	Space
137	An individual	Ann Cummins	ANON-AANH-QJX6-1	
138	A group	Ursula O'Brien and Imelda O, Neill	ANON-AANH-QJX5-Z	
139	An individual	Margaret O'Brien	ANON-AANH-QJXD-F	
140	An individual	Wai	ANON-AANH-QJX8-3	
141	An individual	Orla Heffernan	ANON-AANH-QJXX-3	
142	An individual	PHILIP O'KEEFFE	ANON-AANH-QJXF-H	
143	An individual	Maria Dominguez	ANON-AANH-QJXR-W	
144	An individual	Carol Fenton	ANON-AANH-QJXJ-N	
145	An individual	Martina otoole	ANON-AANH-QJX3-X	
146	An individual	Gary B	ANON-AANH-QJX4-Y	
147	A group	From Lanesborough Residents	ANON-AANH-QJXM-R	
148	An individual	Suzanne Redmond	ANON-AANH-QJXH-K	
149	An individual	Ciara Ahern	ANON-AANH-QJM1-H	
150	An individual	J Byrne	ANON-AANH-QJM9-S	
151	An individual	Mary Cobbe	ANON-AANH-QJMT-M	
152	A group	Brid Meaney	ANON-AANH-QJMP-G	
153	An organisation	Megrick Limited	ANON-AANH-QJMN-E	
154	An organisation	Firethorn Ltd	ANON-AANH-QJM2-J	
155	An individual	Cathy Summers	ANON-AANH-QJM8-R	
156	An individual	Debbie Henvey	ANON-AANH-QJMD-4	
157	An individual	Jamie O'Halleron	ANON-AANH-QJMQ-H	
158	An individual	Samantha warren	ANON-AANH-QJMX-R	
159	An individual	Lisa McCabe	ANON-AANH-QJMC-3	
160	An individual	Keith Williams	ANON-AANH-QJMA-1	
161	An individual	Philomena & Eamonn Murphy	ANON-AANH-QJMZ-T	
162	An organisation	Lanesborough Residents Association	ANON-AANH-QJM4-M	
163	An individual	Kathleen O'Connor	ANON-AANH-QJMR-J	

Submission No.	Submission type	Name	Citizen Response ID	Space
164	An individual	Robbie Loughlin	ANON-AANH-QJMW-Q	
165	An individual	Denise	ANON-AANH-QJMJ-A	
166	An individual	MAURA FLEMING / KATHLEEN REILLY	ANON-AANH-QJM3-K	
167	An individual	Sinéad	ANON-AANH-QJM7-Q	
168	An individual	Stephen	ANON-AANH-QJMS-K	
169	A group	Meakstown Community Council	ANON-AANH-QJMH-8	
170	An individual	Niall Downes	ANON-AANH-QJMM-D	
171	An individual	Tina Kelly	ANON-AANH-QJMU-N	
172	An individual	Clíodhna Daly	ANON-AANH-QJMG-7	
173	An individual	Tom & Joann Kavanagh	ANON-AANH-QJMK-B	
174	An individual	Dolores Finnegan	ANON-AANH-QJDT-B	
175	An individual	Padraic and Tara Fanning	ANON-AANH-QJD1-8	
176	An individual	Sinead	ANON-AANH-QJDP-7	
177	An individual	Patrick Rattigan	ANON-AANH-QJDY-G	
178	An individual	Dermot G	ANON-AANH-QJDB-S	
179	An individual	Juan	ANON-AANH-QJDN-5	
180	An individual	Janet	ANON-AANH-QJDE-V	
181	An individual	Kd	ANON-AANH-QJD2-9	
182	An individual	Ruth Doherty	ANON-AANH-QJD5-C	
183	An individual	Orla Dunne	ANON-AANH-QJDD-U	
184	An individual	Joyce Walsh	ANON-AANH-QJDX-F	
185	An individual	Anne Martin	ANON-AANH-QJDQ-8	
186	An individual	Sandra Mooney	ANON-AANH-QJDJ-1	
187	An individual	Antoinette Milne	ANON-AANH-QJD6-D	
188	An organisation	Uisce Eireann	ANON-AANH-QJD3-A	
189	An individual	Avril Feeney	ANON-AANH-QJD4-B	
190	An individual	Derek Feeney	ANON-AANH-QJDW-E	
191	An individual	Paul McAuliffe TD	ANON-AANH-QJD7-E	

Submission No.	Submission type	Name	Citizen Response ID	Space
192	An individual	Rita Fernandez	ANON-AANH-QJDM-4	
193	An organisation	Clearstream Court Residents Association	ANON-AANH-QJDS-A	
194	An organisation	Burgess Galvin & Co. Limited	ANON-AANH-QJDC-T	
195	An individual	Linda Ivory	ANON-AANH-QJDH-Y	
196	An organisation	Jamestown Village Limited	ANON-AANH-QJDZ-H	
197	An individual	John Duffy	ANON-AANH-QJDK-2	
198	A group	Finglas Regeneration Ltd.	ANON-AANH-QJDU-C	
199	An organisation	Fingal County Council	ANON-AANH-QJ8T-Y	
200	An individual	Margaret	ANON-AANH-QJDF-W	
201	An individual	Martin Egan	ANON-AANH-QJ81-V	
202	An individual	Mrs. Morrissey	ANON-AANH-QJ89-4	
203	An individual	George Cooper	ANON-AANH-QJ8V-1	
204	An individual	Róisín Shortall TD	ANON-AANH-QJ8Y-4	
205	An organisation	Electricity Supply Board	ANON-AANH-QJ8P-U	
206	An individual	Councillor Anthony Connaghan	ANON-AANH-QJ8B-D	
207	An individual	Dara Kennedy	ANON-AANH-QJ8N-S	
208	An organisation	Development 8	ANON-AANH-QJDA-R	
209	An individual	Councillor Mary Callaghan	ANON-AANH-QJ8E-G	
210	An organisation	McKee Quarter Residents Association	ANON-AANH-QJDG-X	
211	An individual	Fiona Connolly	ANON-AANH-QJ82-W	
212	An individual	John & Miriam Connolly	ANON-AANH-QJ88-3	
213	An organisation	Department of Education	ANON-AANH-QJ8D-F	
214	An individual	David Hill	ANON-AANH-QJXC-E	
215	An organisation	McKee Quarter Residents Association	ANON-AANH-QJ85-Z	
216	An individual	Máire Ní Chróinín	ANON-AANH-QJ86-1	
217	An individual	Michael Mullaney	ANON-AANH-QJ8Q-V	
218	An individual	Thomas Smith	BHLF-AANH-QJ8X-3	

Submission No.	Submission type	Name	Citizen Response ID	Space
219	An individual	Gerard Donnelly	BHLF-AANH-QJ8A-C	
220	An individual	Lily Mooney	BHLF-AANH-QJ8Z-5	
221	An individual	Peter Buckley	BHLF-AANH-QJ8F-H	
222	An individual	Mary Elizabeth Winston	BHLF-AANH-QJ8R-W	
223	An individual	Celia Brady	BHLF-AANH-QJ8J-N	
224	An individual	Shannen & Gary Boshell	BHLF-AANH-QJ83-X	
225	An individual	Jean Barry	BHLF-AANH-QJ84-Y	
226	An individual	Jacqueline Byrne	BHLF-AANH-QJ8W-2	
227	An individual	Mark Christie	BHLF-AANH-QJ87-2	
228	A group	Dwyers	BHLF-AANH-QJ8M-R	
229	An individual	Charlotte Mosley	BHLF-AANH-QJ8S-X	
230	An individual	Margaret O'Brien	BHLF-AANH-QJ8H-K	
231	An individual	Carmel Mullins	BHLF-AANH-QJ8G-J	
232	An individual	Margaret Fagan & Christina Fagan	BHLF-AANH-QJ8K-P	
233	An individual	Marie & Michael Duffy	BHLF-AANH-QJZT-1	
234	An individual	Nicola & David Higgins	BHLF-AANH-QJZ1-X	
235	An individual	Margaret Boland	BHLF-AANH-QJZ9-6	
236	An individual	Lilian Cody	BHLF-AANH-QJZV-3	
237	An individual	Ann Fallon	BHLF-AANH-QJZY-6	
238	An individual	Thomas Ahern	BHLF-AANH-QJZP-W	
239	An individual	Thomas Hussey	BHLF-AANH-QJZB-F	
240	A group	Pauline and Kevin Carroll	BHLF-AANH-QJZN-U	
241	A group	Caroline Cooney and Kathleen Cooney	BHLF-AANH-QJZE-J	
242	An organisation	National Transport Authority	BHLF-AANH-QJZ2-Y	
243	An individual	Susan Holmes	BHLF-AANH-QJZ8-5	
244	An organisation	Office of the Planning Regulator	BHLF-AANH-QJZ6-3	

2.2 Summary of issues raised by prescribed bodies / state agencies and the Chief Executive's response and recommendations

2.2.1 Office of the Planning Regulator

Summary

A submission was received from the Office of the Planning Regulator advising that the consultation documents were reviewed, but the Regulator has no comments to make on the non-statutory plan at this stage.

Chief Executive's Response

The Chief Executive notes the submission from the Office of the Planning Regulator.

Chief Executive's Recommendation

No change is recommended.

2.2.2 Land Development Agency

Summary

A submission was received from the Land Development Agency in the context of state lands identified within the Jamestown Masterplan and their potential for delivering affordable housing in the future. Reference is made to the recently published Report on Relevant Public Land (RRPL) in March 2023, which includes a 4.5 ha site owned by the Electrical Supply Board (ESB), a Schedule 2 public body under the LDA Act 2021. This site is located within the DCC and Fingal County Council administrative areas. This report identified the ESB lands as a 'Class 2' site, cited as having medium to long term potential for appropriate residential-led development with the potential to achieve between 520-670 new homes. In this context, the LDA requests that the Jamestown Masterplan refer to the relevant public lands and the potential role of the LDA in the delivery of affordable and sustainable residential development. The LDA also encourages DCC to liaise with Fingal County Council in relation to boundary sites.

The LDA is supportive of the vision to deliver a sustainable development of up to 3,800 new homes, including the urban structure which supports filtered permeability to encourage a model shift to active mobility. It is noted that the green infrastructure and open space strategy provides a robust framework, enhancing ecological assets.

While the LDA acknowledges that the urban form and design sets out a well-considered vision for block layout, height and design, it is noted that the vision does not extend beyond the boundaries of the masterplan area. In this regard the LDA would welcome some design guidance for the boundary locations, so that they can be designed in a sensitive manner.

It is requested that DCC consider the role of the LDA in delivering social and affordable housing under the Land Use and Phasing chapters of the Masterplan, noting their unique position of being able to work with landowners in the delivery of residential-led regeneration. The LDA express their commitment to working with DCC and Fingal County Council and other stakeholders in the delivery of sustainable affordable and social homes, to maximise the role of public lands.

Chief Executive's Response

The Chief Executive welcomes the submission from the Land Development Agency and in particular welcomes the support expressed for the vision, urban structure, green infrastructure, open space, form and design set out in the draft Masterplan. DCC have carried out detailed engagement with all landowners within the Masterplan lands since the adoption of Variation no. 33 in 2021, including the ESB and have engaged closely with Fingal County Council in relation to land which borders and/or extends across the respective administrative boundaries.

The Chief Executive acknowledges the challenges in bringing forward proposals and delivering schemes on these lands having regard to the current zoning and land uses/activities on the Fingal lands. Furthermore, many of the existing businesses within the DCC lands in this location intend to operate over the medium to longer term. For these reasons, these lands have been identified as phase 3. Chapter 5 of the draft Masterplan (Section 'Employment/commercial led mixed use') notes that any proposals for lands along the northern edge 'will be assessed in accordance with current land uses and as part of any forthcoming strategic plans on these lands. It is also acknowledged that some flexibility will be given to these lands, having regard to potential redevelopment opportunities on the Fingal lands, subject to any forthcoming framework plan.

The land use strategy set out in the draft Masterplan identifies a band of employment-led lands along the northern boundary with Fingal County Council, stating that this is to create 'a buffer between established industrial/employment uses and new uses. As set out in Chapter 6 – Phasing & Sequencing, the 'first applications within each of the designated sub-areas will be required to demonstrate compliance with this Masterplan', including the lodgement of a detailed Masterplan. While the Chief Executive acknowledges the request for further design guidance, having regard to the above uncertainties and the long-term potential of these lands, it is generally considered in this instance that the draft Masterplan adequately responds to the changes requested, which can be comprehensively addressed as part of site-specific proposals and as part of the development management process. This position will be reviewed accordingly.

It is also noted that the Fingal County Council Development Plan 2023-2029, includes provision for the preparation of a Framework Plan for the Jamestown Business Park (FP 11.C), located to the immediate north of the Draft Masterplan lands and which includes the balance of the ESB lands. This Framework Plan which is to be developed over the lifetime of Fingal's Development Plan will be subject to public consultation will provide future opportunities to align and coordinate the long-term objectives for these lands between both local authorities. Any potential amendments sought on the basis of this study can be considered/ accommodated in the review of the Dublin City Development plan.

The Chief Executive acknowledges the role that the LDA have in delivering social and affordable housing on state lands. It is considered appropriate to update the draft Masterplan to emphasise this role in delivering the vision for the Jamestown lands.

Chief Executive's Recommendation

It is recommended to update the draft Masterplan to include the following text changes.

Chapter 5: Land Use & Function

Residential

Page: 21

Amendment

Insert new paragraph.

{The potential role of the Land Development Agency in delivering social and affordable homes on the ESB lands located in the north west of the Masterplan is recognised and supported.}

Chapter 5: Land Use & Function

Employment/commercial led mixed use

Page: 21

Amendment

Residential developments proposed in the north west proximate to St Margaret's Road will be considered, subject to design and amenity considerations and considering how they integrate with existing employment lands to the north. Some flexibility will be given to the lands along the northern edge, having regard to potential redevelopment opportunities on lands within Fingal County Council. {The ESB lands situated between Dublin City Council and Fingal County Council present an opportunity to provide social and affordable housing as part of a comprehensive proposal for these lands in association with Fingal County Council.}

Chapter 6: Phasing & Sequencing

Table 6.1 Sequencing of development

Page: 25

Amendment

Insert the following:

Phase	Key infrastructure / requirements	Stakeholder
Phase 2 (and Phase 3)	<u>{Delivery of social and affordable housing as part of any redevelopment of the ESB lands.}</u>	<u>{ESB, Land Development Agency, DCC, Fingal County Council}</u>

Chapter 6: Phasing & Sequencing

Funding and implementation

Page: 26

Amendment

All measures and funding streams available to provide for the delivery of key infrastructure and community facilities in Jamestown will be pursued in conjunction with landowners/developers. **{The role of the Land Development Agency in unlocking relevant public land to provide for sustainable, social and affordable housing is recognised. Dublin City Council will support the Land Development Agency should the ESB lands be redeveloped, in association with the ESB, Fingal County Council and all relevant stakeholders.}**

2.2.3 DAA

Summary

A submission was received from DAA. No comments were issued in relation to the draft Masterplan but consultation was recommended with the IAA and the IAA-ANSP (now AirNav Ireland).

Chief Executive's Response

The Chief Executive notes the submission from DAA. While consultation with the IAA and the IAA_ANSP is not a statutory requirement of this process, Dublin City Council is happy to engage, and will undertake to do so, prior to finalisation of the Masterplan.

Chief Executive's Recommendation

No change is recommended.

2.2.4 Transport Infrastructure Ireland

Summary

A submission was received from Transport Infrastructure Ireland. No observations were made. It was stated that future Luas, Metro and BusConnects alignments are a matter for the National Transport Authority.

Chief Executive's Response

The Chief Executive notes the submission from Transport Infrastructure Ireland.

Chief Executive's Recommendation

No change is recommended.

2.2.5 Uisce Éireann - Irish Water

Summary

A submission was received from Uisce Éireann (UÉ). A number of observations were made including noting that the Jamestown lands currently drain to the north Dublin drainage network, where there are significant capacity issues. The submission clarifies that UÉ are currently modelling the Ballymun/Finglas sewer network as part of the North Fringe / Sutton Pumping Station Drainage Area Plan. It is stated that the area is likely to be diverted to the Northern Interceptor Sewer – Ballymun Pumping Station and on to the North Fringe sewer system, which will take a number of years.

Having regard to the existing constraints in the network, SUDs solutions and separation of combined sewers are required. UÉ notes that where this solution is an option, early engagement with DCC's Parks and Roads departments in the proposals for SUDs implementation would be welcomed.

To maximise the capacity of existing collection systems for foul water, the discharge of additional surface water to combined (foul and surface water) sewers is not permitted.

UÉ notes an increase in the housing density/population target over and above that identified in the City Development Plan, which is now estimated at 7,000 - 8,000 persons.

It is also noted that localised network upgrades may also be required, particularly in areas served by sewers with a diameter of 150mm or less, or watermains with a diameter of 80mm or less. The requirement for more significant network reinforcements to service the whole of the Masterplan Lands are noted by UÉ. In cases where network reinforcements such as upgrades or extensions are required, UÉ note that these shall be developer driven unless there are committed UÉ projects in place to progress such works.

The submission also clarifies the new process for new connections and the requirements and standards relating to the protection of assets in the design and layout of proposals.

Chief Executive's Response

The Chief Executive notes the submission from UÉ and welcomes clarification regarding the current status of the Ballymun/Finglas sewer network as part of the North Fringe / Sutton Pumping Station Drainage Area Plan.

Dublin City Council prepared a surface water management strategy which informed the draft Masterplan. The incorporation of SuDS and green infrastructure is an integral part of the design rationale contained in the draft Masterplan. The Chief Executive welcomes the support for SuDS measures and welcomes future engagement with UÉ as individual proposals progress.

The draft Masterplan represents a detailed refinement of the SDRA 3 framework set out in the Dublin City Development Plan. As such, the urban structure, block layouts, building envelopes and heights illustrated and modelled in the draft Masterplan have formed the basis of the quantum of development and the mix of uses that the Jamestown lands can support. The quantum of development identified in SDRA 3 is based on an assumed density of 100 units per hectare (gross). This approach is consistent with the core strategy in the Development Plan but was not based on a detailed design assessment. The requirement for a Masterplan on the Jamestown lands was to refine the strategic blueprint to guide development proposals

on these lands. Approximately 22ha of the masterplan lands are identified as immediately available, with the remainder of the lands likely to remain in employment/industrial uses over the medium to long term. It is therefore anticipated that approximately 2,300 homes may be subject to planning approvals within phase 1. The regeneration of the lands will likely take place over multiple development plans. In this context, the quantum set out in the draft Masterplan is considered consistent with the core strategy figures in the Development Plan.

The Chief Executive notes the observations relating to detailed design considerations and new connections. This is a matter for individual developers and will form part of the development management process.

Chief Executive's Recommendation

No change is recommended.

2.2.6 Fingal County Council

Summary

A submission was received from Fingal County Council (FCC). The submission sets out the spatial context of the Jamestown Masterplan in relation to FCC, noting that the immediately adjacent FCC lands are zoned for GE – General Employment in the recently adopted Fingal County Development Plan 2023-2029 and are also subject to an objective to prepare a framework plan for the Jamestown Business Park. It is noted that the draft Masterplan is adjacent to Charlestown and Meakstown in Fingal, which have experienced significant growth in recent years and sets out the strategic importance of these communities.

FCC welcomes the overarching aim and approach of the draft Masterplan and in particular notes how the lands present an opportunity to provide high quality open space and dedicated recreational and community resources which can cater for new and existing communities in the wider area. Furthermore, FCC supports the overall land use and function set out and welcomes the identification of a new primary school site. It states that access and permeability to the school is key, citing access to and from the proposed Meakstown Community Centre and Lanesbrough Park. The submission emphasises the requirement to consider overall school places in the wider area including Meakstown and Charlestown.

FCC supports the overall approach to land use and phasing in so far that it relates to their GE – General Employment zoning and the forthcoming framework plan, noting the approach to the phase 3 lands and lands immediately adjoining FCC. Overall, the draft Jamestown Masterplan is considered to accord with the land use zoning and objectives set out in the Fingal County Development Plan.

Chief Executive's Response

The Chief Executive welcomes the submission from Fingal County Council and in particular welcomes the support for the overall strategic approach to the regeneration of the Jamestown lands. The overall land use approach has carefully considered current uses/activities and land use zonings within the Fingal administrative area to ensure that appropriate uses are situated along the northern boundary.

The Chief Executive acknowledges the wider demand for school places in the wider Finglas environs, within the respective administrative areas of DCC and FCC. The identification of a primary school site within the draft Masterplan was based on comprehensive consultations with the Department of Education prior to the publication of the draft Masterplan and previously in advance of Variation No. 33 of the former Development Plan and as part of the Finglas Strategy (2021). DCC is committed to further engagements with FCC and the Department of Education in relation to the education needs in the north Finglas environs.

The Chief Executive looks forward to continuing engaging with FCC in relation to the preparation of a framework plan for the adjacent General Employment zoned lands north of the draft Masterplan.

Chief Executive's Recommendation

No change is recommended.

2.2.7 Electricity Supply Board

Summary

A submission was received from the Electricity Supply Board (ESB) having regard to their landholding at St Margaret's Road and the strategic role the current operation has in supporting the delivery of an efficient electricity service and in relation to the Unidare 38kV substation located on the lands. It is stated that the site on St Margaret's Road is approximately 4.3 ha and extends across the boundaries of DCC and FCC, with 1.62 ha falling within DCC.

The submission notes that the ESB Networks Depot at St Margaret's Road is one of the ESB's primary engineering centres, providing accommodation for circa 150 staff and providing services of strategic national importance, including the Regional Engineering Centre servicing in excess of 280,000 commercial and domestic customers in north Dublin and its wider environs. Having regard to their requirements to store critical high value materials and respond to faults within mandatory timeframes, it is stated that the presence at St Margaret's Road is required. The site also contains the ESB National Archives which is home to a collection described as having national importance and contained within an energy efficient building which achieved an A1 BER, net-zero consumption and a net carbon zero footprint. The ESB outlines the recent upgrades to their offices and confirms that their lifespan has been recalibrated to year one from 2023 for a lifespan of a further 15-20 years.

The submission outlines how the ESB is the owner of the Electricity Network and as the licensed Distribution System Operator, is responsible for planning, operating, and maintaining all the sub-transmission networks which in the Greater Dublin Area includes the 110kV and 38kV systems, the medium voltage (10kV and 20kV) network, and the low voltage electricity network in the Fingal area.

The Unidare substation is a 38kV outdoor electricity substation and is an integral element of the electricity network for north Co. Dublin. It is stated that unimpeded access to the Unidare 38kV compound and its laydown areas is essential and that lands associated with the substation are not suitable for redevelopment as they are critical to current and future operational requirements. Furthermore, it outlines that there is potential to explore converting

the substation to an indoor GIS Station to be incorporated into any future development, however this would require a long lead in time and incur significant costs. The submission outlines that in addition to an ESB Telecoms installation there is significant cable infrastructure emanating from the station. Two 38kV overhead circuits are feeding the station from the north, Finglas & Whitehall stations respectively. These cables are overhead and follow the route of the proposed public park. Working directly beneath or close to overhead electricity lines is extremely hazardous and requires special controls to be in place to ensure Safe Exclusion Zones are not breached. In this regard, ESB Networks should be consulted during the detailed design process to ensure the necessary protocols are in place.

Overall, the ESB supports the vision set out in in draft Masterplan to deliver the sustainable redevelopment of the Jamestown lands. However, it is stated that their lands at St Margaret's Road and Unidare 38kV substation accommodates services of strategic national importance and notes that existing uses will be maintained on these lands in the medium to long term. The submission confirms that the inclusion of the ESB lands in phase 3 is consistent with their future timelines.

Chief Executive's Response

The Chief Executive welcomes the submission from the ESB and in particular welcomes the support expressed for the vision of the draft Masterplan to deliver a sustainable, mixed-use neighbourhood. The strategic importance of the ESB operations and Unidare 38kV substation is recognised. In this regard, the draft Masterplan indicates that the Unidare 38kV substation will remain on the lands, with an appropriate buffer required to maintain operations and access to cables. Notwithstanding this, should the ESB wish to explore converting this substation to an indoor GIS Station as part of any future proposals, this will be supported. Any detailed design proposals adjacent to the Unidare substation will require consultation with the ESB as part of the development management process.

As noted above, the inclusion of the ESB lands within phase 3 of the draft Masterplan is in recognition of the importance of current operations and followed consultation with the ESB as a landowner and strategic service provider. The Chief Executive acknowledges that this is consistent with future timelines of the ESB. However, it is emphasised that the Chief Executive supports the medium to long term consolidation of these state-owned lands as part of future proposals. It is also recognised that any redevelopment opportunities will require consultation with Fingal County Council and require consideration as part of any future framework plan prepared on the Fingal lands. The draft Masterplan supports this approach.

Chief Executive's Recommendation

No change is recommended.

2.2.8 Department of Education

Summary

A submission was received from the Department of Education. Acknowledgement is given to the pre-publication consultation throughout 2022 and 2023 with regards to the identified school site. The Department notes that while static car parking is not required in this instance, the

size of the identified site is considered small and it is stated that this 'will make it difficult to achieve the competing priorities for an intensively planned and used primary school facility, including building footprint, surface water attenuation, contributions to streets and roads, public open space, and competing roof space for renewable technologies an necessary onsite play space'.

The submission notes the proposed indicative location of MUGA located on the central open space in the context of the proposed primary school. Concern is raised that the primary school site is separated from this MUGA and *'does not support a reasonable level of safe daily operational use by primary school pupils'*. Furthermore, the submission states that *'the intended overflow play strategy for the primary school within the draft plan cannot be realised in the current form'*.

The Department states that the anticipated quantum of homes and corresponding future population growth has considerably increased over the figures used in the Dublin City Development Plan 2022-2028. According to the Department, it is stated that the figures cited in the draft Masterplan differs from previous discussions held with DCC in relation to the school site. The Department cites a population figure between 7,000 and 9,500 people. On this basis the submission states that the Department *'has now identified a potential future requirement for a second primary school in Jamestown, subject to the projected population materialising, the age profile of that future population and other factors which influence school accommodation needs'*.

The Department also notes that the anticipated population will have a significant impact on education provision at post primary level and would welcome engagement with DCC on this matter.

The submission makes a number of observations regarding the assessment of current and future capacity and the requirement to respond to unforeseen circumstances, citing the war in Ukraine. In this regard the Department note that if the findings of an assessment require a review of existing or future school site provision within a specific location, the Department will engage with DCC.

The Department also note that additional Special Education Needs (SEN) at both primary and post primary level will be required throughout the country. It is stated that the Department will liaise with DCC if and when additional SEN accommodation is required in specific locations.

Chief Executive's Response

The Chief Executive notes the submission from the Department of Education. For clarity, DCC comprehensively engaged with the Department throughout 2022 and 2023 in relation to the selection, design and footprint of the school site as published in the draft Masterplan. The draft Masterplan was published in its current form on the basis of the outcome of this collaboration and engagement.

DCC can confirm that the urban block containing the indicative building footprint of the school site in the draft Masterplan is 0.58 ha. This area excludes the surrounding streets, pedestrian realm and illustrated SuDS/landscaping. The indicative form illustrated contains two blocks of 5 and 4 storeys containing a floor area of approximately 6,712m² and 3,867m² respectively. The latter block represents opportunities for future expansion or the provision of specialist education needs and/or on-site supports. As noted in the draft Masterplan, the final form and design of the school is a matter for the Department of Education. The illustrated school site

also contains an on-site MUGA area that is approximately 0.12 ha. The overall concept for this school site is based on an urban model, having regard to the site's location, context and proximity to future public transport corridors.

Therefore, having regard to the modelling carried out the Chief Executive does not accept that the site is restrictive in so far that it relates to the cited competing priorities in the Department's submission to include contributions to streets, roads and public open space. On the basis of this modelling and having regard to recently granted schools in an urban context, the City Council is confident that the identified site can adequately cater for the demand anticipated within phase one, as set out in the draft Masterplan. Excluding the expansion zone, additional play areas and sensory gardens can be comfortably accommodated on the site. In the absence of empirical evidence that can demonstrate the unsuitability of the current site to deliver a primary school based on design grounds, the Chief Executive does not recommend any changes to the net area of the site at this juncture. The final design and form of the school and indeed the final site acquisition area is a matter for the Department of Education and the respective landowners. It is the role of the Planning Authority to identify a suitable site.

The submission outlines concerns relating to the proximity of the primary school to the indicative public MUGA illustrated within the central public open space in terms of hindering its use as an overflow play area. This indicative MUGA is intended to serve the wider needs of the population. An on-site MUGA is located within the primary school site. Notwithstanding concerns raised, subject to detailed design considerations which may be introduced, including compliance with DMURS and the creation of a pedestrian dominated public realm, the Chief Executive would not be of the view that the sharing of adjacent sites for older children should be eliminated at this stage, in the absence of detailed design proposals.

The draft Masterplan represents a detailed refinement of the SDRA 3 framework set out in the Dublin City Development Plan 2022-2028. The quantum of development identified in SDRA 3 is based on an assumed density of 100 units per hectare (gross). This strategic and high-level approximation is consistent with the core strategy set out in the Development Plan but is not based on a detailed design or site-specific assessment. The requirement to prepare a Masterplan on the Jamestown lands was to refine the strategic blueprint to guide development proposals on these lands and to provide further clarity on the quantum of development likely and the associated population. As such, the urban structure, block layouts, building envelopes and heights illustrated and modelled in the draft Masterplan have formed the basis of the revised quantum of development and the mix of uses that the Jamestown lands can likely support. This approach is supported by SDRA 3 of the Development Plan.

Furthermore, in the interest of clarity it was originally intended that the masterplan be prepared by the major landowners. Following a lack of consensus surrounding the urban structure and built form, including the identification of a school site, the provision of streets, public open space and social/community uses, DCC took the masterplan in-house in November 2022. Initial discussions with the Department were based on the quantum of development and anticipated population figures for the lands prepared by the landowners. These original figures were considerably higher densities than those published by DCC in this draft and included the provision of a single primary school.

The Chief Executive notes that the department cites an anticipated population figure of between 7,000-9,500 people. For clarity, the draft Masterplan notes an anticipated population figure between 7,000-8,000 people. Following detailed consultations with all landowners a detailed phasing strategy was devised. This identified approximately 22ha of the masterplan lands as immediately available, with the remainder of the lands likely to remain in employment/industrial uses over the medium to long term. It is therefore anticipated that

approximately 2,300 homes may be subject to planning approvals within phase one. For this reason, DCC in consultation with the Department required the primary school site to be reserved in phase one.

It is noted that the Department in their submission identifies a *'potential future requirement'* for a second primary school on the basis of higher anticipated capacity. This is further caveated subject to the *'projected population materialising, the age profile of that future population and other factors which influence school accommodation needs'*. It is not anticipated that the stated 3,800 homes will be delivered in the life of the current Development Plan. This sets out the long-term likely scenario, based on the form and uses modelled. This is also based on the assumption that all landowners and businesses re-develop. It is unlikely that businesses such as Johnston Mooney and O'Brien or Finglas Business Centre, amongst others situated in phase 3, will be subject to redevelopment in the short to medium term. For this reason, phase 3 lands will be subject to review.

On this basis, and further to the above, the Chief Executive is not convinced that sufficient empirical evidence has been submitted to DCC to warrant the provision of an additional primary school within the phase 1 lands. However, it is acknowledged that the regeneration of the lands will likely take place over multiple development plans and the Masterplan may be amended in this context having regard to phase 3 lands becoming available. In this context, the Chief Executive recommends that an additional primary school location may be reserved within the northern phase 3 lands, subject to the requirements of the Department of Education. This position will be reviewed in accordance with the Development Plan process and changing context, including the changing context of the Fingal lands to the north.

The Chief Executive welcomes further consultation between the Department and Fingal County Council in relation to the identification of a suitable site for a post primary school to serve the north Finglas environs.

The Chief Executive notes the Department's observations regarding the potential to review current or existing school site provision on the basis of findings of any future assessments, with specific reference to Special Education Needs and other changing priorities. Having regard to this, the Chief Executive considers it appropriate to amend the draft Masterplan to clarify that the current primary school site reserved in phase one will be subject to review, subject to the requirements of the Department of Education.

Chief Executive's Recommendation

It is recommended to update the draft Masterplan to include the following text.

Chapter 5: Land Use & Function

Primary School Site

Page: 21

Amendment:

The location of the school is fixed to this location, as illustrated in figure 5.1. {This location will be reviewed in accordance with the Development Plan or if circumstances considerably change, subject to the requirements of the Department of Education. Following a review, if this site is no longer required by the Department of Education to provide a primary school, it shall revert to ‘residential led mixed use’.}

Chapter 5: Land Use & Function

Primary School Site

Page: 21

Amendment:

{A second primary school site may be reserved in the northern phase 2 lands, subject to the requirements of the Department of Education. The location of this site will be subject to consultation with the Department of Education, Fingal County Council and impacted landowners. This requirement will be reviewed in accordance with the Development Plan or if circumstances considerably change, subject to the requirements of the Department of Education.}

Chapter 6: Phasing & Sequencing

Table 6.1

Page: 25

Amendment:

Insert the following:

Phase	Key infrastructure / requirements	Stakeholder
Phase 2 (and Phase 3)	<u>{Primary school}</u>	<u>{Department of Education}</u>

2.2.9 National Transport Authority

Summary

A submission from the National Transport Authority (NTA) makes a number of observations and recommendations based on the Transport Strategy for the Greater Dublin Area 2022-2042.

The NTA states that Jamestown is an appropriate location for intensive residential and commercial development, due to its location within the existing urban fabric of the City and proximity to existing and proposed public transport. Having regard to Luas Finglas, the submission identifies that the proposed stops at St Margaret’s Road and Charlestown have

been strategically placed to maximise the catchment area of the Jamestown lands. The NTA acknowledges the comprehensive engagement between DCC, the NTA and the Luas Finglas team with regards to access arrangements to businesses on St Margaret's Road. The NTA supports the proposed rear access to premises on St Margaret's Road, as set out in the draft Masterplan. It is stated that it is intended to include an access route in the application for a Railway Order to An Bord Pleanála based on further engagement. It is also noted that further engagement will be required relating to setbacks of any future structures, cycling routes and public realm upgrades along St Margaret's Road.

The NTA supports the way the draft Masterplan addressed transportation matters and in particular welcomes:

- The rationalisation of access onto St Margaret's Road.
- The fine-grained urban form.
- The approach to filtered permeability which will reduce the potential for the dispersal of through traffic by private car and promote walking and cycling.

However, the submission notes that through movements by car is facilitated via the Main Street – Key Access and the NTA expresses some concerns that if this street was to be used for a bus service, the presence of traffic may impose delays on the service. As such, the NTA recommend that a statement is incorporated into the Masterplan that states in the event of a bus service being introduced in the future, delays to this service will be monitored and measures introduced to provide bus priority and to manage through traffic by considering measures such as bus gates.

The NTA notes that the draft Masterplan does not introduce specific standards for car and cycle parking and assumes that the standards set out in the Dublin City Development Plan will apply to future development proposals. It is stated that zone 3 reflects the current level of public transport. Having regard to the future redevelopment of the lands, the NTA recommends a statement providing for the application of more restrictive parking standards than that provided for in the Development Plan to reflect the increased level of accessibility as the lands are redeveloped.

In relation to the proposed land use mix and distribution, the NTA expresses some concern related to the requirement for a secondary school within the lands, noting the distance to existing schools and the potential future population to the north of the Masterplan lands. As such, the NTA recommends that the requirement for a secondary school is reconsidered in this context, in particular having regard to the pattern of development on the lands north of Jamestown.

Chief Executive's Response

The Chief Executive welcomes the submission from the NTA and in particular welcomes the support expressed for the overall strategic approach and the incorporation of transportation matters.

The Chief Executive welcomes the support given for the proposed access arrangements set out in the draft Masterplan relating to existing premises on St Margaret's Road. In particular it is welcomed that an access route that can serve businesses from the rear will be included in the Railway Order to An Bord Pleanála. Dublin City Council welcomes future engagement on this matter and will support an arrangement that aligns with the draft Masterplan.

The concerns relating to through car movement along the proposed key access street are noted, and the potential that such movement could hinder future bus services/routes. The design and layout of this access street as illustrated in the draft Masterplan has considered future public transportation options, in addition to considering movement for existing businesses, while facilitating redevelopment opportunities across various landholdings. While the Chief Executive is not opposed to the control of private vehicular and business traffic through the lands, it is generally considered that this be addressed at detailed design or project level. Notwithstanding this, it is accepted that further clarity is required regarding the anticipated future function of this key access street. While the level of detail required to facilitate controlled access, bus gates or other measures to control private vehicular movement and/or business traffic is a matter for detailed design and will not be addressed in the Masterplan, it is considered appropriate that the principles of future movement and future requirements for project level are strategically addressed by way of additional text in the Masterplan.

In relation to parking and cycle standards, the NTA are correct that the standards set out in the Dublin City Development Plan will apply to any future proposals. The Masterplan will sit within the policy context of the operational Development Plan. While it is noted that the Jamestown lands are located within zone 3 which reflects the current context, the Chief Executive also notes that car parking standards as comprehensively set out in Appendix 5 of the Development Plan are maximum standards and are not targets. All proposals are assessed on a case-by-case basis, which will take into consideration a number of issues including the end uses(s), the surrounding context and the ratio of parking required to make a sustainable community. For these reasons, it is not considered appropriate to introduce separate standards to those outlined in the Development Plan. It is considered that the recommendation of the NTA is adequately addressed in the text of the Development Plan and any update to the zone will be considered as part of a review of the Development Plan.

The concerns raised relating to the potential requirement for a post primary school are noted. DCC have proactively engaged with the Department of Education and Fingal County Council on the requirement for a post primary school in the wider north Finglas environs to address current and future demand, particularly arising from the Charlestown and Meakstown communities in Fingal. While it is acknowledged that this requirement is current, it is also stressed that the Jamestown lands will not create an immediate additional demand for post primary education. The possible requirement for an additional primary school has been identified by the Department of Education, as addressed above. DCC will continue to engage with the Department of Education and Fingal County Council to identify a suitable site that can serve existing and future demands in the area.

Chief Executive's Recommendation

It is recommended to update the draft Masterplan to include the following text.

Chapter 2: Urban Structure

Page: 6

Amendment:

Insert the below text in the third paragraph:

The key access street is designed to cater for vehicular movements, designed to prioritise pedestrians and cyclists, while incorporating significant SuDS features and street trees. {Detailed design proposals will be required to prepare a Mobility Management Plan to address the detailed control and management of traffic and how local access and business traffic will be managed, having regard to phasing and sequencing of sites. If a bus service is introduced through Jamestown, consideration will be given to the incorporation of bus gates or other measures to prioritise public and sustainable transport and to control the movement of private and business traffic.}

Chapter 6: Phasing & Sequencing

Page: 6

Amendment:

Page: 25

Amendment:

Insert the following:

Phase	Key infrastructure / requirements	Stakeholder
Phase 1	<u>{Preparation of a Mobility Management Plan to address the detailed control and management of traffic and how local access and business traffic will be managed, having regard to phasing and sequencing of sites}</u>	<u>{Developer/Landowner}</u>

2.3 Summary of issues raised by members of the public / interested parties, by chapter and theme and the Chief Executive's response and recommendations

2.3.1 Introduction & Vision

Summary

Members of the public

Several submissions received have expressed support for the vision and principles contained within the draft Masterplan for Jamestown and support the regeneration of this underutilised brownfield land bank. Some submissions support existing businesses remaining on site while also supporting the opportunity for new housing and the provision of new local amenities and services. Several submissions note that the vision will improve Finglas village and provide a stimulus for investment.

Many submissions have expressed concerns relating to the increase in development capacity over and above that set out in SDRA 3 of the Dublin City Development Plan 2022-2028. Some submissions have requested that this increase is clarified and explained, citing examples of similar scales of development. Other submissions have called for a reduction in the number of homes envisaged, citing the associated concerns regarding the lack of essential services and infrastructure. Other submissions are concerned about the overall population increase envisaged for the area and the impact this will have on Finglas.

One submission has noted that some elements of the draft Masterplan are not 'fixed' and calls for more certainty to be provided.

Landowners/Businesses

Submissions were received from the following landowners:

- Ardez
- Burgess Galvin & Co
- Firethorn Ltd (Manhattan Peanuts Ltd)
- Jamestown Village Ltd
- Development 8
- Finglas Regeneration Ltd (Haribo, Sigma and CEL lands)
- Megrick Ltd (KSG)
- TAM Ireland
- An Post
- ESB

The submissions received from the landowners are generally supportive of the draft Masterplan, whilst setting out requests for alterations and amendments to support their individual landholdings. These issues are addressed in greater detail under the ensuing chapter headings. A number of the landowners expressed their wish to proceed to design and pre-planning stages and to bring forward new development.

The draft Masterplan is criticised in part by some landowners for the lack of clarity on density. A number of submissions specifically seek a density range consistent with those set out in Table 1 of Appendix 3 of the Dublin City Development Plan 2022-2028 which specifies 100-

250 units per hectare (uph) (net value) for SDRAs. Reference is also made to other locally granted permissions where schemes have over 200 uph. The submission from Finglas Regeneration Ltd. calls for clarity on the number of anticipated homes, seeking to ensure that the projected 3,800 homes is not used as an upper limit or cap on development potential. They believe the site is capable of delivering in the order of 4,599 residential units (at a net density of 190 uph) and seek a re-examination of the capacity of the lands.

A few of the landowner submissions requested greater flexibility regarding those elements that are fixed or flexible, seeking greater flexibility (also addressed under various chapter headings).

One of the landowner submissions questioned the need for a Masterplan, stating that the SDRA guiding principles provided sufficient guidance and detail for planning applications to come forward, and stated that the Masterplan is overly prescriptive. The submission requests that proposals be considered on their individual planning merits and adherence to the SDRA.

Chief Executive's Response

The Chief Executive welcomes the support expressed for the vision and design principles set out in the draft Masterplan. The strategic vision for the Jamestown lands is to reimagine an underutilised industrial land bank to deliver a sustainable, mixed-use neighbourhood to create new homes, to create new and support existing jobs, complimented with new community amenities and open spaces. Having regard to significant state investment in public transportation in the wider area (including Luas Finglas and BusConnects) the Jamestown lands have the potential to become an exemplar in urban design led planning.

The draft Masterplan represents a detailed refinement of the SDRA 3 framework set out in the Dublin City Development Plan 2022-2028. As such, the urban structure, block layouts, building envelopes and heights illustrated and modelled in the draft Masterplan have formed the basis of the quantum of development and the mix of uses that the Jamestown lands can support. The quantum of development identified in SDRA 3 is based on an assumed density of 100 units per hectare (gross). This approach is consistent with the core strategy in the Development Plan but was not based on a detailed site-specific design assessment. The requirement for a Masterplan on the Jamestown lands was to refine the strategic blueprint to guide development proposals on these lands. The Masterplan process identified that approximately 22ha of the lands are identified as immediately available, with the remainder of the lands likely to remain in employment/industrial uses over the medium to long term. It is therefore anticipated that approximately 2,300 homes may be subject to planning approvals within phase 1.

The regeneration of the lands will likely take place over multiple development plans. In this context, the quantum set out in the draft Masterplan is considered consistent with the core strategy figures in the Development Plan. Having regard to the context of this underutilised industrial land bank within the existing urban fabric of the City, the current availability of sites for housing and regeneration opportunities, the significant state investment in public transportation in the immediate environs and the national and regional planning context pertaining to consolidation and intensification, the quantum of development envisaged in the draft Masterplan is considered appropriate and sustainable. Furthermore, this conclusion is supported by an urban design led and evidence-based approach to the potential development capacity of the subject lands, which demonstrates compatibility with the guiding principles set out in SDRA 3 of the Development Plan. For these reasons, it is not considered appropriate to reduce the quantum of development envisaged or to limit redevelopment opportunities.

In relation to submissions calling for a greater clarity on density, the Chief Executive emphasises that the final Masterplan will sit within the operational Development Plan. Having regard to the capacity of development envisaged on the lands, the draft Masterplan is considered to be consistent with the net density ranges set out in Table 1 of Appendix 3 of the Dublin City Development Plan. With specific reference to a submission from Finglas Regeneration Ltd who suggests that a range of approximately 4,599 units may be achieved on the lands at a net density range of 190 units per hectare, the Chief Executive wishes to emphasise that the Z14 zoning objective and indeed the vision for the lands requires employment opportunities, in addition to community and other supporting uses. The quantum of development envisaged in the draft Masterplan is based on the use mix, building envelopes and forms modelled and set out. It does not stipulate a cap, nor does it stipulate a target. It should also be emphasised that this anticipated figure is predicated on all lands coming forward for development. As set out in the draft Masterplan, approximately 50% of the lands will remain in employment use over the medium to long term. A final number of units will also be based on the range and nature of typologies and tenures provided. For these reasons it is not recommended that any changes are introduced in the draft Masterplan as current text and the provisions of the current Development Plan adequately respond to the matters raised.

The Chief Executive acknowledges that concerns have been raised from members of the public and landowners regarding the stated fixed, flexible and indicative elements illustrated in the draft Masterplan. It is imperative that certain elements are considered 'fixed' in accordance with the definition set out in the draft Masterplan. This is to ensure that a cohesive and sustainable urban structure and form is delivered, which will be subject to minor variation only (to be agreed with the Planning Authority). Identified 'fixed' elements are intended to provide certainty to landowners and the public to guide the long-term regeneration of this strategic land bank and to support state investment in public transportation. Having regard to the strategic nature of the draft Masterplan and the complex nature of brownfield urban regeneration, it is considered appropriate that certain elements contained in the draft Masterplan are identified as 'flexible'. Flexibility in this context still requires any deviation to adhere to the overall design principles and urban structure set out and not be compromised, but allows for some deviation, based on a detailed design of a given site or landholding. If any deviation is permitted, this will not compromise the overall strategic objectives envisaged in the draft Masterplan. Fixing certain elements at Masterplan level could negatively impact the overall delivery of the regeneration project. For these reasons it is not considered appropriate to introduce additional 'fixed' elements to the final Masterplan.

The Chief Executive acknowledges that some landowners have requested enhanced flexibility, with one suggesting that the guiding principles set out in SDRA 3 are sufficient for individual sites to come forward for development proposals in the absence of a Masterplan. Having regard to the requirement to provide for a coordinated approach to the provision of streets and connections between landholdings, public open space, surface and foul water infrastructure, community facilities including the provision of a school(s) and an overall coordinated approach to the built form, taking account of phasing and landownership patterns, the Chief Executive strongly rebuts any suggestion that a Masterplan for the Jamestown lands is not essential. A Masterplan is considered essential to the delivery of a sustainable and planned urban regeneration of this significant land bank in the context of Dublin City and will be essential in the overall delivery of the objectives set out in the National Planning Framework and Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly.

In response to recommended changes to the masterplan phasing, it is recommended to update the development capacity envisaged in phase 1 and the respective land area. Please refer to Phasing & Sequencing for details and the rationale.

Chief Executive's Recommendation

While no changes are proposed based on the above issues raised, changes proposed in relation to phasing directly impact the site areas and development capacity for phase 1 as set out in Chapter 1: Introduction & Vision. Please see Section 2.3.6 for proposed changes.

2.3.2 Urban Structure

Summary

Members of the public

Several submissions have indicated that they support the proposed urban structure and in particular support the enhanced permeability for pedestrians and cyclists and the emphasis on connecting with the proposed Luas Stop at St Margaret's Road.

Several submissions claim that the draft urban structure fails to sufficiently divert traffic away from Finglas village. The opinion is expressed that there is opportunity for a new orbital route from Sycamore Road in the direction of St Margaret's Road. It is stated that the draft Masterplan places the main eastern entrance on the west of Jamestown Road south of Clancy Avenue and north of Clune Road which is claimed by some will increase traffic congestion. It is also stated that there is a lack of detail regarding the deliverability of a route connecting to Melville Road, stating that this needs to be agreed with Fingal County Council. A number of submissions also express concerns that there is only one main vehicular route through the lands. Another has requested that this route becomes a public transport only route, with local access permitted.

A large number of submissions have raised concerns regarding any new vehicular entrances connecting with Jamestown Road, McKee Avenue and St Margaret's Road. Some submissions have indicated that they do not want any entrances onto their respective streets, noting concerns relating to congestion and safety. It is also noted that any new entrances should be pedestrian/cycle only. Other submissions have stated that they want Jamestown Road and McKee Avenue to be widened, while others do not support the provision of cycle lanes to the existing road network.

Some submissions have indicated that there is a lack of detail regarding proposed cycle routes contained in the draft Masterplan. Another expressed support for upgrades to Jamestown Road, McKee Avenue and St Margaret's Road to include set-backs, tree planting and cycle lanes, but indicates that the draft Masterplan does not provide sufficient detail or clarity. It is requested that upgrades to the surrounding street network become a fixed aspect of the final Masterplan.

Some submissions have stated that there is a lack of permeability for pedestrians and cyclists in the draft Masterplan. Others have noted that they do not want any connections between the Masterplan lands and existing residential developments, including St Margaret's Court and Clearstream Court. One submission questions why there are no dedicated cycle and walking routes illustrated between residential blocks, raising concerns that the current urban structure will increase car usage.

A submission expresses dissatisfaction that the location of the school is not in a pedestrian only zone, stating that this will not encourage a modal shift away from private vehicle use.

Landowners/Businesses

The overall urban structure was broadly supported by the majority of the landowners. A few submissions queried the purpose of “local streets” seeking clarity in their role and function; and if they be for pedestrian/cycle purposes only? The submission from TAM Ireland was however critical of the fixed nature of the movement framework and seeks greater flexibility in the approach.

The following specific changes to the Masterplan were requested:

- The Masterplan should make provision for an additional Luas stop within the Ardex lands, on St. Margaret’s Road.
- The submission from Development 8 states that they have an inequitable portion of infrastructure requirements, and requests provision of an infrastructure equalisation measure between the various landowners.
- The Finglas Regeneration Ltd submission seeks clarity stating that the local streets through their lands are not accessible through roads for vehicles.
- The submission from TAM Ireland requests a justification for the delivery of one primary main vehicular street stating that it constrains their site and states that the sub area 1C is disproportionately impacted by infrastructure requirements, notably the Main Street as set out in the draft Masterplan. The submission seeks clarity that the onus of providing the Main Street does not fall on individual landowners. It also states that the wider movement framework, should not be fixed and there should be flexibility in the provision of vehicular through routes through site 1C. With regards to the proposed setbacks along Jamestown and McKee Avenue, the submission states that the fixed building lines proposed will restrict this delivery.

Chief Executive’s Response

The Chief Executive welcomes the general support expressed for the urban structure set out in the draft Masterplan. A robust urban structure is essential in establishing a framework to support redevelopment opportunities, while ensuring that an overall cohesive vision is achieved for the lands. As noted in the text of the draft Masterplan, the urban structure constitutes a detailed refinement of the SDRA framework that has evolved following significant consultations with all stakeholders since 2021. The urban structure acknowledges the short-term redevelopment opportunities within phase 1, while also considers existing business operations. It has responded to current and future access arrangements that will be revised following the operational phase of Luas Finglas. It also considers, where possible, landownership boundaries to support regeneration opportunities across the lands. Furthermore, it also considers future opportunities within the phase 3 lands, should existing businesses redevelop in the future.

Having regard to this process, it is essential that certainty is provided to support the forthcoming Railway Order for Luas Finglas, while also providing clarity to landowners to support individual redevelopment opportunities. Having regard to the anticipated duration to redevelop these lands and to ensure that the principles of placemaking can be adhered to throughout this duration, the urban structure is fixed, subject to the definition set out in Chapter 1 of the draft Masterplan. The criticisms from TAM Ireland are noted in this instance, with particular reference to the delivery of the main key access street, but for the reasons set out,

it is not considered that a sufficient argument has been made to revise this strategy. The flexibility sought would essentially erode the Masterplan and remove any clarity for individual landowners and Luas Finglas. Furthermore, this approach would not provide DCC with the tools or mechanisms to support the delivery of placemaking and the delivery of a compact, sustainable community to support state investment.

The challenges regarding the delivery of the urban structure and other infrastructure are noted and it is acknowledged that this will require collaboration across landownership boundaries. This is a common feature in brownfield urban regeneration. This will be addressed further under Phasing and Sequencing.

The concerns stating that the proposed urban structure will increase current traffic congestion in the area are acknowledged by virtue of the location of the main key access street and other entrances onto Jamestown Road and McKee Avenue. Alternative suggestions for an orbital route from Sycamore Road toward St Margaret's Road are also noted. As noted above, the proposed urban structure has considered many factors. As set out in the SDRA, the principles of filtered permeability have been applied to this land bank and have informed the evolution of the urban structure. The provision of a new orbital road, south of Melville Road was not considered appropriate in this context. The design and layout of the key access street as illustrated in the draft Masterplan has considered future public transportation options, in addition to considering movement for existing businesses, while facilitating redevelopment opportunities across various landholdings. As set out previously, in response to the submission from the National Transport Authority (NTA), it is accepted that further clarity is required regarding the anticipated future function of this key access street. While the level of detail required to facilitate controlled access, bus gates or other measures to control private vehicular movement and/or business traffic is a matter for detailed design and will not be addressed in the Masterplan, it is considered appropriate that the principles of future movement and future requirements for project level are strategically addressed by way of additional text in the Masterplan.

In relation to extending the key access street north into Fingal County Council, the Masterplan clearly demonstrates the aspirations of the City Council to link north towards the Meakstown neighbourhood centre and to Lanesborough Park. Providing a direct link between these community facilities to the north and the Masterplan community hub and school to the south would provide benefits to the proposed future residents and to the wider community. This element will be further addressed when Fingal County Council carry out their Framework Plan for the lands to the north. Any modifications or changes required on foot of the Fingal Plan will be addressed as part of the Development Plan review, acknowledging that these lands are not anticipated to come forward within the current Development Plan timescale (see also Section 2.3.6 on Phasing & Sequencing).

In response to the request for an additional Luas stop in the Ardez lands, as noted in the submission received from the NTA, DCC have comprehensively engaged with the NTA and TII in relation to Luas Finglas. On the basis of the urban design work carried out in Finglas by DCC, the emerging preferred Luas stop at Mellows Park was relocated to St Margaret's Road in the published preferred route, on account of the urban structure set out. DCC fully supports the delivery of Luas Finglas and supports the current location of the stop in its current form. Furthermore, the specific location of stops is a matter for the Finglas Luas team.

In response to submissions which claimed that the draft Masterplan contained a lack of detail regarding proposed walking and cycle routes and intended upgrades to Jamestown Road and McKee Avenue, it is considered that the draft Masterplan sufficiently sets out the strategic approach that will be required. The level of detail requested in some cases is a matter for

individual planning applications or projects. With regards to the school site, it is stressed that the proposed school site is adjacent to a pedestrian-only link to the immediate west, which provides a direct connection to the proposed Luas stop. Furthermore, it is situated immediately west of the linear park/pedestrian/cycle link.

Some submissions related to concerns regarding future permeability or connectivity to adjacent developments. While permeability may be encouraged and supported in some instances, the draft Masterplan does not give consent for individual projects. Projects will be subject to planning consent.

In response to clarity sought regarding the status of some local streets, figure 2.4 clearly illustrates the urban structure and indicates where filtered permeability applies. Figure 2.1 provides further clarity on this matter.

Chief Executive's Recommendation

It is recommended to update the draft Masterplan to include the following text.

Chapter 2: Urban Structure

Page: 6

Amendment:

Insert the below text in the third paragraph:

The key access street is designed to cater for vehicular movements, designed to prioritise pedestrians and cyclists, while incorporating significant SuDS features and street trees.

{Detailed design proposals will be required to prepare a Mobility Management Plan to address the detailed control and management of traffic and how local access and business traffic will be managed, having regard to phasing and sequencing of sites. If a bus service is introduced through Jamestown, consideration will be given to the incorporation of bus gates or other measures to prioritise public and sustainable transport and to control the movement of private and business traffic.}

2.3.3 Green Infrastructure & Open Space

Summary

Members of the public

A number of submissions expressed support for the approach to green infrastructure and open space as set out in the draft Masterplan. Many submissions claim that the draft Masterplan significantly underprovides public open space, with a number noting that many of the proposed spaces are not usable for recreation or sport by virtue of their size and layout. A suggestion was received that consideration be given to a greenway to link Poppintree Park to the site. Some claim that the approach to public open space would appear to be an afterthought.

A number of submissions suggests that consideration should be given to the provision of an urban plaza or square instead of a green space, stating that such spaces support the community and those who do not play sports. Another submission suggests that green space should be allocated to the school. Some submissions have requested that the central open space be increased in size as it cannot accommodate GAA or soccer pitches.

Some submissions suggest that a green buffer be introduced along Jamestown Road and McKee Avenue with buildings setback to protect existing residential and visual amenity.

Several submissions have expressed concerns relating to flooding as a result of potential significant rainfall events and note that the draft Masterplan does not provide details as to how the area will be safeguarded. Some submissions expressed support for the daylighting of the Finglas Stream, but one submission expresses doubt as to whether this can be delivered, referencing the requirements for a detailed flood risk assessment.

A few submissions stated that the green spaces and the approach to green infrastructure does not support biodiversity and has limited ecological value. Several observations request that details regarding amenities and activities such as playgrounds, skate parks, dog parks etc, be introduced in the final Masterplan.

Landowners/Businesses

The following specific changes to the Masterplan were requested from landowners/local businesses:

- Request to divert the Finglas River to lands east of the Ardez landholding, to a more central location within the new park.
- The submission from Development 8, raises concerns over the proportionality of land allocated for open space within the Development 8 land holding. The submission states that 17% of the Development 8 lands are shown as public open space (including the open space located along the proposed east to west water course), which significantly exceeds the average proportion of open space across all landholdings.
- The submission from Finglas Regeneration Ltd requests that the open space is not a fixed element of the plan, on the basis of the draft Sustainable and Compact Settlement Guidelines for Planning Authorities. The guidelines note that 'to enable greater innovation in housing design a more graduated and flexible approach to the application of residential development standards will be required. In particular, it will be necessary to review and update standards for houses and duplex units in local development plans'. This includes a minimum open space requirement of 10% of the total site area

(net) for new residential development in statutory plans. The submission also calls for a delivery plan for the open space, putting in place funding mechanisms and pro-rated contribution for their delivery.

- The submission from KSG broadly supports the green infrastructure and open space network but seeks flexibility with regard to the delivery of on-site attenuation locations.
- The submission from TAM Ireland is critical of the requirement for “vast open spaces” throughout the Masterplan, alongside the need for nature-based solutions and attenuation for cater for rainwater and surface water management. The submission states that the proposed communal, semi-private and private open spaces have been excluded from the SuDS and mitigation considerations. The location of basins/ ponds for water storage and the siting of open spaces should not be fixed and each planning application should be allowed to provide 10% public open space within their own scheme. The proposed park at the centre of site 1C is cited as excessively large, consuming c. 19% of the site’s total area, which is disproportionate to the overall Masterplan requirements. The submission is also critical of the identification of sub-area 1C as the only potential location for a play space. It requests that the open space be positioned to act as a gateway into the Phase 3 open space to the south.

Chief Executive’s Response

The submissions received in relation to open space vary from requests from the public for significant additional open space to requests from the landowners for significant reductions in open space provision. The draft Masterplan has sought to provide a mix of open spaces that cater for different users, identifying potential sites for play, for MUGA, gym equipment, community garden, alongside riparian zones, landscaped streets and SuDs landscaping. The 5.6 ha of dedicated public open space provision equates to 13% of the overall masterplan lands. These spaces are spread throughout the Masterplan area to create different character areas amongst the open space provision. The specific details in relation to playground design and amenities within the parks are matters for individual planning applications, best assessed based on up-to-date Community and Social Audit assessments, required under the Development Plan for all schemes of 50 + units, and thereby enabling identification of gaps in local amenity provision at the time of assessment.

In addition to the Community and Social Audit, all planning applications will be required to submit a Landscape Masterplan / Landscape Design Report, detailing the specific approach to the public open space of any given area, and provide details in relation to biodiversity and planting schemes. This level of detailed design is a matter for individual planning applications.

The central open space proposed in the draft Plan has not been designed to provide for GAA or football pitch provision, on the basis of proximity to Poppintree Park to the immediate north-east and McKelvey Celtic FC to the immediate west. Poppintree Park is one of the City’s 13 no. flagship parks, extending to 18.5ha and provides 5 no. Pitches (4 no. Soccer and 1 no. GAA), a cricket crease, changing facilities and playground. While the open space within Jamestown is capable of providing a number of MUGAs, the focus on the open space here is more recreational and community driven as opposed to field sports.

Linking Poppintree Park to the Jamestown area is however supported in the draft Masterplan and is also an objective of the Finglas Strategy 2021, a non-statutory study of the Finglas area by the Planning Department. To achieve this link, from a biodiversity and amenity perspective, the Masterplan details key “green” links that connect to Jamestown Road to the east, and to the north, into the Fingal lands. Continuing this approach through the Fingal lands will be

sought during the consultation with Fingal County Council in the preparation of their Framework Plan, seeking an additional green link to Lanesborough Park.

The open space allocation next to the junction with McKee Avenue and St Margaret's Road, and across from the proposed Luas stop, is indicated as a plaza/square to provide a more urban context for this open space, and as such it is envisaged to provide spaces for people to sit and gather within a hard landscape setting, provided alongside planting/SuDS features.

The school site is capable of delivering open space/amenity provision within its own footprint at both ground level and at roof level as provided in numerous urban school settings across the city. The location of the key open space in proximate to the school will allow easy access to this amenity.

In response to the requests for a green buffer along Jamestown Road and McKee Avenue, the Masterplan details a requirement for fixed building lines along these streets to provide a strong urban form to the street. The proposed set back is sufficient to provide for tree planting and SuDS features (as per the Urban Form & Design section) and has the potential to significantly enhance and soften these street edges. Requests to omit these set-backs are refuted on the basis of providing a quality and safe built environment.

In response to concerns relating to flooding and extreme weather events, the green infrastructure and open space strategy has been informed by a Surface Water Management Strategy and a Strategic Flood Risk Assessment, which has incorporated nature-based solutions into the management of stormwater. In relation to concerns expressed regarding the emphasis placed on public realm natural attenuation and observations expressed that this approach was not equitable, it is emphasised that the draft Masterplan adapts best-practice approaches to the management of surface water in accordance with current cited guidelines. It is also stressed that the final Masterplan will sit within the policy context of the operational Development Plan, the provisions of which will apply to any proposed development on the Jamestown lands. However, to ensure that the strategy envisaged is implementable in full having regard to phasing and sequencing, it is recommended that the draft Masterplan is updated to clarify future requirements as part of detailed designs and proposed developments. Please also refer to Phasing and Sequencing.

The proposed de-culverting of the Finglas stream and the retention of existing open water courses are important means of reducing and slowing the flow of surface water downstream and by planting along riparian banks opportunities are provided to filter pollutants whilst providing an attractive green amenity at source. Requests to divert one small section of the river east into adjoining lands will not be accommodated at this point, as it would significantly impact not only on adjoining land holdings, but does not take into account the open section of river to the immediate north of this site. The objective is to maintain and strengthen the integrity of the river path where feasible.

With regard to the requests from the landowners to either reduce the scale of the open space requirements and/or spread it equitably across all landowners, with each providing a maximum of 10%, such an approach is not considered in keeping with the core principles of the Masterplan. While the Plan does attempt to spread the open space across the area, it is imperative that the area provide key areas of open space that are of sufficient scale to provide not just amenity and recreation, but also to be of ecological value and to cater for surface water attenuation. One of the key purposes of providing the Masterplan is to ensure that infrastructural elements required to sustain a new neighbourhood are clearly identified and earmarked from the outset.

Chief Executive's Recommendation

It is recommended to update the draft Masterplan to include the following.

Chapter 3: Green Infrastructure & Open Space

Page: 10

Amendment:

The proposed green infrastructure and open space network has been underpinned by a {Surface Water Management Strategy} (~~Stormwater (Rainwater) Management Plan (RMP)~~) and Strategic Flood Risk Assessment (SFRA) which has provided the evidence base for the design, layout and quantity of public open space and green space throughout the Masterplan. The principles of water sensitive urban design and nature-based solutions to the control and management of surface and rainwater have informed the green open space network and strategy for the lands, which forms a key structuring element for the urban structure. For this reason, the public open space network is considered a fixed element of the Masterplan.

Surface water management

The green infrastructure strategy has been informed by ~~(the Dublin City Development Plan,)~~ 'Nature-based Solutions to the Management of Rainwater and Surface Water Run-Off in Urban Areas: Water Sensitive Urban Design. Best Practice Interim Guidance Document' (March 2022), {the Dublin City Development Plan 2022-2028} and the DCC 'Sustainable Drainage Design & Evaluation Guide' (2021) and provides for:

- The de-culverting of the Finglas Stream and the retention of existing open watercourses, with an appropriate riparian zone.
- {The de-culverting of the east-west link into an open channel and its integration into landscaping proposals.}
- ~~(An integrated Sustainable Urban Drainage Systems (SuDS) approach, utilising an integrated nature based solutions response, providing for)~~ {Nature-based solutions and Sustainable Urban Drainage Systems (SuDS) in the management of surface water and integrated fully with the landscaping proposals. Provision shall be made for the incorporation of} open swales, retention basins/ponds and other nature-based solutions throughout the public realm.
- Site controls to ensure that water quality will be improved.
- An attenuation network with clear ~~(prescriptive)~~ parameters on the ~~(requirements of each sub-catchment in respect of)~~ attenuation responsibilities within the public open space network and within individual sites.

The location of retention/attenuation basins/ponds on public open spaces has been informed by a (Surface Water Management Strategy. These are essential in achieving an integrated green infrastructure strategy.) ~~(RMP, which identified a number of sub-catchment drainage areas in response to topography and are essential in achieving an integrated green infrastructure strategy.)~~ The location of these basins/ponds are a fixed element of the Masterplan.

{A Surface Water Management Plan (SWMP) shall be prepared for the entire masterplan by the landowners/developers and agreed with the planning authority in advance of the lodgement of any planning applications. The SWMP shall demonstrate compliance with the requirements and objectives set out in the Surface Water Management Strategy.}

~~(The illustrated theoretical on-site attenuation locations are flexible, subject to compliance with required surface water management requirements. However, individual proposals shall demonstrate how they comply with the required attenuation volumes indicated in the RMP.)~~

Chapter 3: Green Infrastructure & Open Space

Page: 10

Figure 3.1 Sustainable Urban Drainage – Water sensitive urban design and nature based solutions concept

Amendment:

Update Figure 3.1 to illustrate revised attenuation requirements.

2.3.4 Urban Form & Design

Summary

Members of the public

A significant number of the submissions received from members of the public have raised strong objections to the proposed heights that are indicated in the draft Masterplan. Of these objections, there are some suggestions to reduce the heights around the perimeter of the site adjacent to existing single and two storey properties, with suggestions ranging from 1-2 storeys considered acceptable. Several submissions have stated that the taller elements indicated should be revised down. Suggestions ranging from 2-6 storeys were generally set out for the lands. Some submissions have suggested 2 storey housing, with no apartments. In general, objections cited the prevailing height context of the surrounding area, potential overshadowing, overlooking, loss of sunlight/daylight and loss of privacy. Furthermore, numerous submissions object to height stating that taller buildings are not suitable for families. A smaller number of submissions indicated their support for the overall approach to height and considered the strategy to be rational.

One submission states that the 3-4 storey heights indicated in proximity to the proposed Luas stop are contrary to Ministerial guidelines by being too low. Another submission has indicated that the 3-4 storey block on Jamestown Road at Oakwood Road be reduced to 2-3 storeys in line with the other blocks along Jamestown Road. Several submissions have requested a maximum building height of 2 storeys along Jamestown Road and McKee Avenue.

A very high number of the submissions have expressed dissatisfaction that heights do not appear to be a fixed element in the draft Masterplan, leading many to state that any proposals on the lands will far exceed the ranges set out in the Masterplan. Clarity is requested on this matter regarding the enforceability of height. Additionally, it is recommended by many that maximum heights be introduced to protect residential amenity. Several submissions refer to the '8+' and 'up to 3 storeys' categories which is claimed are ambivalent.

The opinion is also expressed in some submissions that high-rise and high-density housing is not the answer to the housing crisis and notes that the scale of development now envisaged is excessive and would be difficult to finance and deliver. It is claimed that the draft Masterplan should seek low to medium height and density. Another submission claims that the approach to height in the Development Plan and this Masterplan is based on proximity to the proposed Luas corridor. Concern is expressed that the Luas is not currently operational and that delays or lack of financing could jeopardise the Masterplan and any aspirations of achieving the 15-minute city.

Landowners/Businesses

The majority of the submissions from the landowners criticised the height and density proposed in the Masterplan and there was a request for the Plan to be submitted to the Office of the Planning Regulator for comment on this issue. A significant number raised concerns that the heights and density set out is contrary to the Dublin City Development Plan zoning and height strategy, the National Planning Framework, the Regional Spatial and Economic Strategy and to the Urban Development and Building Height Section 28 Ministerial Guidelines. It was stated that the heights are too low, do not provide sufficient strong edges to streets, do not lend themselves to compact design and do not make sustainable use of urban land and in particular land proximate to future planned public transport and adjoining established residential communities. It was submitted that heights should be based on performance criteria and not be restricted. Several submissions made comparisons with other locally approved schemes in Charlestown and on Jamestown village lands (SHD Reg. Ref.: 312568-22) which were approved for significantly higher and denser schemes. Others referred to the previously prepared draft Masterplan by O'Mahoney Pike Architects in Nov 22 which provided greater height and queried the lower heights now proposed in the Masterplan.

A number of submissions felt the restriction imposed by the height, the density and the land take for infrastructure would make the schemes unviable.

Requests were also made for greater flexibility with regard to the fixed building lines, seeking deviation where it can be demonstrated at planning application stage, that all applicable development standards can be achieved.

The following site-specific requests were made:

Ardez

- Seeks amendments to Figure 4.1 to allow heights of a minimum of 7-floors/24 m parapet (not up to 4-storey), to St Margaret's Road, and heights to the East, of 5-6 stories (not 3 storey).
- The eastern boundary to the Ardez redevelopment should align with the eastern boundary of the existing residential development to the north (St Margaret's Court estate).

- Submission seeks the provision of 2 apartment blocks on the site, with a minimum c. 20m separation (facilitated by the diversion of the Finglas Stream to the east).
- Query the wall to the rear of St Margaret's Court remaining in place.

Burgess Galvin & Co

- Seeks amendments to figure 4.1, to allow for building heights of a minimum of 4-6 stories across the entirety of the Burgess Galvin lands, with opportunity for increased height in the northeast corner.

Jamestown Village Ltd

- Seeks amendments to figure 4.1, to allow heights of a minimum of 4-6 storey at the eastern perimeter fronting Jamestown Road, stating that the approved SHD (subject to Judicial Review), proved via the day light sunlight analysis that heights of 5-6 stories did not unduly impact on residential units along Jamestown Road to the east of the site.
- The Jamestown Village Ltd submission seeks the omission of the setbacks and footpath widening proposed along Jamestown Road to accommodate landscaping, cycle and pedestrian footpath infrastructure, due to impact on the developmental potential of the Jamestown Village lands. It states that *further details of the extent of any widening of footpaths at this location is required within the final version of the masterplan.*

Development 8

- Seeks amendments to figure 4.1, to ensure building heights along the eastern edge of the SDRA provide for a minimum of 4-6 storey in height, and also to allow for buildings of increased height to be assessed against performance criteria of the DCDP Appendix 3 Height Strategy.

Finglas Regeneration Ltd

- Higher buildings (8+) at locations outside the 2 hubs is sought. Specifically at the following changes are sought to height, fig 4.1:
 - Haribo Site: Seeks (i) 4-5 storeys at McKee Avenue (up from the 3-4 storeys); (ii) 4-6 storeys on northern frontage with a graduated transition upwards moving inward from McKee Avenue; (iii) 7-8 storeys at Corner of Main Street and Central Open Space (up from proposed 5-6 storey).
 - Sigma site: seeks 6-storeys at Main Street with scope to rise to 8-9 stories.
 - CEL site: 4-6 stories at Main Street, with graduated rise to 8 stories at central open space (up from 3-4). Also 4 storeys along Jamestown Road, with opportunity for additional height through set back treatment, and at s-e corner along Main Street.

KSG

- Is supportive of the building lines shown for their lands. Changes sought relate to height and seek confirmation that the SPPR1 and SPPR3 of the Building Height Guidelines apply to the site.

TAM Ireland

- The submission from TAM Ireland is critical of the overly prescriptive nature of the Masterplan. It states that the large public open space within site 1C creates an irregular urban structure and should be “squared-off”. It is claimed that the location of the open space has pushed future development blocks outwards towards existing constraints such as roads and existing established residential and employment uses.
- Their submission also states that the urban blocks appear to fall short of the key guiding principle of 60-80 m in size and not more than 100m in width/length.
- It states that the fixed building lines to Jamestown Road and McKee Avenue contradicts the guiding principle set out in the Development Plan for flexibility along boundary roads to protect existing residential amenity and enhance the public realm.
- Greater height is sought throughout. The submission seeks clarity that the heights proposed are not fixed and can be agreed at planning application stage, and that the statement requiring “Lower building heights” to Jamestown and McKee Avenue be removed and reworded to read: *“Applicant’s will be required to demonstrate that the detailed design, layout, and built form (massing and height) of their proposal will respect the amenity of existing residential properties.”* The creation of an additional height framing the western side of the proposed east-west section of the Main Street is sought (immediately north of the open space within 1C). The submission also claims the 3D height images are not adequately reflective of the heights proposed in Figure 4.1

Chief Executive’s Response

The Chief Executive acknowledges the significant concerns expressed in relation to the height strategy set out in the draft Masterplan from members of the public and the majority of landowners. The height strategy for the Jamestown lands was established based on the following principles:

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

In relation to the latter, the draft Masterplan is clear that *‘[l]ower building heights are required along Jamestown Road, McKee Avenue and St Margaret’s Court, to respect existing residential properties and to provide adequate transition, gradually increasing towards the centre and north west of the land’*. In general, heights of up to 3 storeys are illustrated in figure 4.1 of the draft Masterplan along Jamestown Road and McKee Avenue, where proposed built form would directly front existing residential properties and/or if separation distances were considered restrictive.

SDRA 3 of the Dublin City Development Plan 2022-2028 establishes that heights in the range of 4-6 storeys will be encouraged for the Jamestown lands to deliver a coherent street structure with an appropriate sense of enclosure. Reduced heights adjacent to existing single and two storey residential properties are also required. Furthermore, the SDRA outlines opportunities for amplified height at prominent corners and opportunities for locally higher buildings to reinforce the urban function of the lands. These locations include the sustainable mobility hub focused on the proposed St Margaret’s Road Luas stop and the central community hub / public open space where heights between 7-8 and 8+ storeys are sought flanking the northern edge. With regards to the proposed Luas stop at St Margaret’s Road, lower building heights in the range of up to 3 storeys are sought immediately adjacent to St Margaret’s Court in order to protect the residential amenity of an established residential

development. Having regard to SPPR 1 of the Urban Development and Building Height Guidelines it is not considered that this contravenes the said guidelines.

Having regard to existing Development Plan policy and the height strategy set out in the draft Masterplan, the Chief Executive considers that the draft Masterplan is consistent with the approach outlined in the Development Plan. Furthermore, the height strategy provides for a gradual stepping up towards the centre of the lands in order to emphasise the function as a community hub, while a further stepping up at St Margaret's Road capitalises on the proposed Luas stop. This robust and evidence-based deviation in heights supports the creation of a coherent and legible urban framework and avoids a blanket and monotonous approach to height that would have a significant negative impact, not only on the existing community but the future community of the area.

In relation to the matter as to whether heights are fixed or flexible, in accordance with SDRA 3 of the Development Plan, the draft Masterplan outlines the overall height ranges across the lands which is based on an urban design assessment. It is not considered that there is ambivalence in this strategy. The final Masterplan will sit within the policy context of the operational Development Plan. As such, the Planning Authority will assess any future planning applications in accordance with this height strategy set out and in accordance with the performance criteria set out in the Development Plan. In relation to a comment regarding the accuracy of figure 4.3 - 3D Perspective, the Chief Executive confirms that this accurately reflects the height ranges set out in figure 4.1.

In response to individual requests for deviations from the heights illustrated in figure 4.1, further to the ranges set out, the draft Masterplan outlines that *'[a]n additional floor, set-back or amplified height on selected prominent corners above the ranges set out in figure 4.1 may be considered appropriate as part of a detailed design proposal, as long as the overall proposal complies with the overarching spatial principles and urban structure established throughout the Masterplan, having regard in particular to the potential impact on existing residential amenity, local height context, the land use function and legibility.'* It is considered that this approach provides for sufficient design flexibility at site level, supports the exploration of a range of typologies and design solutions, while ensuring an overall coherent vision for the lands. An individual site-based approach to a significant brownfield land bank is not considered sustainable, would not adhere to an urban design led approach to development and would not be in the interest of the proper planning and sustainable development of the area.

In relation to concerns raised regarding perceived uncertainties regarding the delivery of Luas Finglas and any associated impact this may have on the anticipated heights and development potential of the subject lands, it is stressed that the subject lands are subject to land use zoning Z14 (Strategic Development and Regeneration) and are subject to a further SDRA designation in the Development Plan, complete with guiding principles and a framework map. The zoning and SDRA designation recognises the strategic importance of this land bank on a city wide and regional context and therefore it is considered appropriate that these lands are subject to a Masterplan to guide a sustainable and coherent pattern of development that can support significant state investment in public transportation. It would not be in the interests of proper planning to delay the preparation of a Masterplan or to prevent regeneration proposals coming forward. In the absence of a Masterplan, any proposals would be progressed on a site basis which would not achieve a robust urban structure and would fail to achieve policies pertaining to 'healthy placemaking'.

In response to criticisms from TAM Ireland that the illustrated urban blocks on their lands do not accord with the guiding principles set out in SDRA 3 of the Development Plan in respect to their size, the Chief Executive can confirm that all the urban blocks referred to accord with the principles set out. Furthermore, having regard to the request for a more conventional block form, it is stressed that the majority of urban lands do not lend themselves to a perfect grid-iron form. Site specific deviations and variations are required to respond to site specific circumstances. Having reviewed this request it is not considered that the urban blocks in question constitute a form that would endanger a detailed design proposal. Furthermore, it is not considered that a robust argument has been put forward to warrant changes to the urban form and the associated alterations to the urban structure and open space.

Having regard to queries regarding fixed building lines and set-backs, in particular along Jamestown Road and concerns that this contradicts the SDRA requirement for set-backs, it is stressed that the draft Masterplan has included set-backs from Jamestown Road and McKee Avenue to provide for an enhanced pedestrian realm and to provide for cycle lanes and tree planting. This will be subject to detailed designs at project or planning application stage. Fixed building lines in this context is to ensure the creation of a consistent and coherent urban form, to ensure that the existing streetscape and amenity is protected and enhanced. In accordance with the definition of 'fixed' set out in Chapter 1, minor variations may be accepted. Therefore, it is not considered that this requirement places an undue burden on any development proposals.

Chief Executive's Recommendation

No change is recommended.

2.3.5 Land Use & Function

Summary

Members of the public

Several submissions received have expressed support for the identification of a primary school site in the draft Masterplan. Some submissions have raised concerns relating to site acquisition and delivery of the school and its inclusion in phase 1, having regard to the existing Manhattan Peanuts operations and a recent planning application submitted relating to the extension of the current operations, reg. ref. 3364/23. Submissions have also requested clarification regarding the Department of Education's intentions to acquire the site and communication DCC have had with the Department on this matter. Submissions have also stated that a secondary school is also required. One submission has outlined the benefits of co-locating community and educational uses, including sharing of sports and recreational facilities and requests that this be addressed in the final Masterplan. Another submission states that the school site should be located beside the central open space.

Several submissions raise concerns regarding the future of existing jobs in the industrial estates and some submissions claim that the draft Masterplan prevents businesses such as Johnston Mooney and O'Brien operating in the area. Some concerns are also raised regarding the co-location of residential and employment uses. Other submissions want to maintain employment on the lands.

Some submissions received are critical that retail is not identified in the draft Masterplan.

Several submissions have questioned why no sites have been identified for a primary care centre, childcare facilities, and other community related services. Other submission have expressed support for the proposed community uses envisaged in the draft Masterplan. A submission notes that the community and cultural uses should be delivered in phase 1 and not in later phases.

Several submissions have requested that further detail is required on the residential typologies envisaged in the draft Masterplan, with some references to Appendix 3 of the Dublin City Development Plan. It is requested that a mix of typologies should become a fixed element of the final Masterplan.

Landowners/Businesses

Ardez

The submission is seeking the provision of a new Luas stop on these lands, alongside a new landmark development, consolidating and enhancing the neighbourhood centre facilities in this vicinity.

Burgess Galvin & Co

The submission seeks amendments to Figure 5.1 of the Draft Masterplan and a change from commercial/employment led mixed use (denoted by light blue colouring), to 'residential led mixed use' (yellow colouring), on the basis that the lands may come forward at an earlier date and may facilitate residential development in keeping with the NPF, Development Plan Guidelines, and investment in public transport infrastructure. The submission refutes the statement in the draft Masterplan that states 'it is not anticipated that this zone will support residential uses in the short and medium term', stating that the "lands are sequentially located in relation to established residential neighbourhood immediately east of Jamestown Road".

Manhattan Peanuts Ltd

This submission requests that the land take proposed for the school site within the Manhattan landholding is reduced in size, in order to not prohibit future viability and expansion of the existing Manhattan Peanuts factory, and in specific in relation to a current planning application, Reg. Ref. 3364/23. The submission also refers to possible air borne allergens arising from the peanut handling nature of the factory and requests that the Department of Education is made aware of this as a potential adjoining land use.

Development 8

Two key issues are raised: (i) the submission states that the quantum of the community and cultural space identified is excessive and disproportionately distributed between landholdings. The submission states that is unlikely that funding will be available for such large spaces and this would undermine the viability of these blocks. Community and cultural uses should be provided in accordance with COU25 of the City Development Plan. The submission specifically requests the removal of '*community/culture lower floors*' uses within Figure 5.1 and insertion of text emphasising compliance with COU25.

(ii) The submission seeks changes to the designation between "residential led" and "commercial-led" land use, amongst 4 key sites, on the basis that some blocks are more likely to come forward earlier than others and that "residential-led" is the only viable option at present.



A: request to change to “commercial-led”
(likely to remain in employment use in short/
medium term)

B, C, & D: available in the short term: request to
change to “residential-led”.

Finglas Regeneration Ltd

With regard to the community hub, the submission is seeking flexibility to review the suitability of uses in alignment with the changing needs of the local area and in response to up to date assessments of community and social infrastructure, to be undertaken at planning application stage, which will avoid overlap of uses and help safeguard the viability of final uses proposed. The following site-specific changes are also sought:

- Haribo site: The landowners envisage a mixed-use scheme here. However, they request the mix should be balanced in favour of residential uses at upper floors. The submission seeks clarity that residential uses can be featured in areas designated as commercial / employment led mixed.
- Sigma site: submission seeks clarity on the provision for residential alongside employment/community uses. Specifically requests the insertion of the following wording:
- *“While commercial-/employment-led mixed uses with community and cultural uses at lower floors are envisaged for development on lands around the central open space, there is scope to allow an appropriate level of residential development at upper storeys. Proposals for residential development in these areas must demonstrate, through the planning application process, that the anticipated overall quantum for residential and non – residential uses are achievable, and that the delivery of housing as part of the mixed-use development proposal for sub areas do not compromise the overall use mix envisaged in the Masterplan.”*
- CEL site: the submission welcomes the residential led mixed uses shown on the CEL lands but requests the addition of a specific objective for age-friendly housing on the CEL lands.

KSG

Land use ratios (mix) should be referred to as indicative and it should be made clear that they do not apply to individual planning applications. Submission also requests that the circle denoting the “sustainable mobility hub” be centred on the new public realm / public plaza and thereby extend further into the Jamestown lands. On this basis the submission seeks changes to the urban form as set out previously in this report.

TAM Ireland

The submission’s key concern with regards to land use, relates to the long-term employment use of the lands immediately south of sub-area 1C, and the impact of this on the future

residential uses within 1C. It is also critical of the lack of clear delineation of the Luas Character Area or the Jamestown Character Area within the Masterplan.

Chief Executive's Response

Dublin City Council has undertaken comprehensive engagement with the Department of Education and the impacted landowners in respect of the identified school site. In relation to the request from Manhattan Peanuts to reduced and modify the size of this site, the Chief Executive refers to the submission received from the Department of Education on this matter and the Chief Executive's response. In relation to concerns expressed regarding the commitment of the Department of Education to acquire this site, the role of the Planning Authority is to identify suitable sites for schools. The Department of Education has indicated a requirement for potentially two primary schools on the Masterplan lands. Dublin City Council has indicated that one primary school be provided in phase one of the Masterplan. The final timeline for delivery of the school and issues involving site acquisition is a matter for the Department of Education.

The submission from Manhattan Peanuts emphasising the possibility of air borne allergens is noted. As noted previously, the identification of this site has followed significant consultations with impacted landowners and the Department of Education. It has been recommended to amend the text of the final Masterplan to note that this site will be reviewed, pending the requirements of the Department of Education. This decision will be a matter for the Department.

Submissions noting the requirement for a secondary school in the area are also noted. This matter has been comprehensively addressed in response to the submission received from the Department of Education. Regarding co-locating community uses, the Chief Executive supports this approach. The draft Masterplan has co-located the primary school adjacent to the community hub. The operational requirements and management of shared uses is a matter for detailed design proposals.

The draft Masterplan supports existing employers and established uses. Chapter 6 – Phasing and Sequencing has a section dedicated to this - 'Supporting established land uses and facilitating change'. Furthermore, figure 6.4 outlines how existing uses in phase 2 and 3 can operate in the context of phase 1.

Some submissions have questioned the absence of retail. The draft Masterplan does not support significant, large-scale retail to prevent the erosion of Finglas Village and to supports its economic revitalisation.

Several submissions identify a range of community and social uses that are required. The draft Masterplan supports this. Specific uses are a matter for detailed design proposals and proposals will be assessed in accordance with the provisions set out in the Development Plan. It is noted that some community uses will not be delivered in phase 1. This is further discussed under Phasing and Sequencing.

The provision of an additional Luas stop on St Margaret's Road is not a matter for this Masterplan.

Submissions requesting various amendments from employment-led mixed use to residential-led mixed use are noted. The justification for rezoning these lands to Z14 were predicated on the vision of maintaining and consolidating employment uses while facilitating residential opportunities. Figure 5.1 of the Masterplan sets out the overall land use function. This is based on clustering and co-locating community and other employment based uses together to avoid

a random approach to use mix across the lands. All categories are mixed use, providing sufficient flexibility on individual cases, while ensuring that the overall vision and urban function is achieved. This approach is compatible with the vision for a 15-minute city as set out in the City Development Plan.

Having regard to requests to consider changes along the boundary with Fingal County Council, it is not considered that this is appropriate, having regard to the current uses and zoning in Fingal. Any change to this position will be based on a review in line with the Development Plan. This is addressed further under Phasing & Sequencing. Section - 'Employment/commercial led mixed use' outlines the position regarding residential uses along the border with Fingal and in the north west proximate to St Margaret's Road. While employment and cultural/community uses are envisaged in the identified community hub proximate to the central open space, some residential development on upper floors may be considered appropriate, subject to detailed design proposals and compatibility with the overall mix and function envisaged in the Masterplan. Residential proposals in these areas should be subservient to the employment/commercial uses envisaged to ensure that the vision of the Masterplan can be achieved. In the interest of clarity it is considered reasonable to amend the text of the final Masterplan to clarify this.

Concerns regarding the provision of community and cultural uses are noted. The provision of such uses is a requirement of the Development Plan in accordance with COU25. It is not accepted that figure 5.1 be amended to remove the identified 'community/culture - lower floors'. The approach in the Masterplan is to avoid a random approach to the provision of community and cultural uses in favour of a strategic and joined-up approach that aligns with the overall use and urban function of the lands. Final uses and individual proposals are a matter for detailed design as part of site-specific proposals. Where landowners are open to collaboratively working together, it is considered reasonable to allow scope for some community/ cultural/ community uses to be concentrated together. The existing provision of Objective CUO25 allows for up to half of the 5% community, arts and cultural spaces to be relocated to sites immediately adjacent. It is recommended that wording is included in the final Masterplan (and subsequent variation) that clarifies that this off-set can be included on lands within the SDRA/Masterplan boundary. Such provision may also assist landowners with regards to land equalisation measures.

Having regard to requests to detail the range of housing typologies envisaged and to provide an objective for age friendly housing on the CEL lands, it is considered that the text under section 'Residential' p. 21 adequately addresses this. However, it is considered reasonable to include minor amendments to the text to emphasise the support for age-appropriate housing. Updates reflecting a submission received from the Land Development Agency regarding social and affordable housing on state land are also included below for reference.

In response to concerns regarding the land use ratios and mix, Chapter 5 – Land Use and Function indicates that the land uses are indicative. The illustrated sustainable mobility hubs and community hubs are indicative, broadly reflecting the area in question. No changes are recommended to the final Masterplan.

TAM Ireland express concerns regarding their proximity to Johnston Mooney and O'Brien and the impact this may have on their landholding. The draft Masterplan indicates residential-led mixed use on these lands. Individual proposals will be assessed on their own merits. In relation to Character Areas, the criticisms are noted. The draft Masterplan has provided considerably more detail compared to the SDRA framework map, setting out a more comprehensive strategy for facilitating regeneration opportunities that responds to phasing and availability of sites.

Chief Executive's Recommendation

It is recommended to update the draft Masterplan to include the following text.

Chapter 5: Land Use & Function

Residential

Page: 21

Amendment:

Insert the below text in the second paragraph:

Having regard to the demographic profile of the surrounding environs, ~~(consideration should be given to)~~ the provision of housing that supports older persons {will be strongly supported}.

Chapter 5: Land Use & Function

Residential

Page: 21

Amendment

Insert new paragraph.

{The potential role of the Land Development Agency in delivering social and affordable homes on the ESB lands located in the north west of the Masterplan is recognised and supported.}

Chapter 5: Land Use & Function

Community Hub

The central public open space will function as a community hub, proximate to the new primary school and along key corridors, as illustrated in figure 5.1. It is anticipated, at a minimum that the ground floors or proposed blocks in this location and along the identified corridors will provide a range of community/cultural spaces as appropriate as part of mixed-use development proposals. This serves to cluster such activities, re-enforcing its function as a neighbourhood/ community centre. In order to support the function of this area and to create a central focus for the new residential communities, the location of significant community facilities around the central open space is fixed, with flexibility along the identified community corridors. {In addition, the flexibility allocated within the Dublin City Development Plan

Objective CUO25, to off-set space requirements for community, arts and cultural spaces (no more than half of the required 5%), to immediately adjacent sites, will be permitted within this central area, from any site within the Jamestown Masterplan area.}

Chapter 5: Land Use & Function

Employment/commercial led mixed use

Page: 21

Amendment

Residential developments proposed in the north west proximate to St Margaret's Road will be considered, subject to design and amenity considerations and considering how they integrate with existing employment lands to the north. Some flexibility will be given to the lands along the northern edge, having regard to potential redevelopment opportunities on lands within Fingal County Council. {The ESB lands situated between Dublin City Council and Fingal County Council present an opportunity to provide social and affordable housing as part of a comprehensive proposal for these lands in association with Fingal County Council.}

Chapter 5: Land Use & Function

Employment/commercial led mixed use

Page: 21

Amendment:

Insert the below text in the third paragraph:

Residential compatible employment opportunities on lands proximate to the central open space are identified and encouraged to support employment consolidation and residential development. {While commercial/employment led mixed use, with additional community/culture uses on lower floors is envisaged within the designated community hub illustrated in figure 5.1, consideration may be given to an appropriate level of residential development on some upper floors. Proposals for residential development in these areas must be ancillary to the primary employment use and must demonstrate how they do not compromise the overall use mix envisaged in the Masterplan.}

Chapter 5: Land Use & Function

Primary School Site

Page: 21

Amendment:

The location of the school is fixed to this location, as illustrated in figure 5.1. {This location will be reviewed in accordance with the Development Plan or if circumstances considerably change, subject to the requirements of the Department of Education. Following a review, if this site is no longer required by the Department of Education to provide a primary school, it shall revert to 'residential led mixed use'.}

Chapter 5: Land Use & Function

Primary School Site

Page: 21

Amendment:

{A second primary school site may be reserved in the northern phase 2 lands, subject to the requirements of the Department of Education. The location of this site will be subject to consultation with the Department of Education, Fingal County Council and impacted landowners. This requirement will be reviewed in accordance with the Development Plan or if circumstances considerably change, subject to the requirements of the Department of Education.}

2.3.6 Phasing & Sequencing

Summary

Members of the public

Several submissions have suggested that development be phased according to the delivery of essential infrastructure and services such as Luas Finglas, schools and community services. Concerns are expressed that delays to Luas Finglas will negatively impact on the area. It is also suggested that the Masterplan be delayed until there is certainty regarding the delivery of Luas Finglas. Some submissions have requested that a social audit is included in the final Masterplan and used as the basis to refuse any proposals where adequate infrastructure is not in place. Others suggest that the delivery of key infrastructure and services become a fixed element of the Masterplan with development proposals linked to the delivery of such infrastructure. Concerns are also expressed that there is no guarantee that essential services will be delivered at each phase of development.

Some concern is expressed regarding the phasing currently outlined in the draft Masterplan, particularly relating to the integration of uses and the delivery of essential services. It is noted that the phases appear to be arbitrary. Some submissions request certainty on all phases prior to individual proposals coming forward. The opinion is also expressed in some submissions that the draft Masterplan fails to clarify how new developments will relate to existing businesses and how existing businesses will be supported to continue their operations until such a time they redevelop. Concerns are also noted regarding the future residential amenity of future residents. It is requested that the draft Masterplan clearly identifies on a map how businesses who intend to operate in the future will integrate with any new developments proposed.

Many submissions have identified that the foul and surface water drainage system in the area requires significant upgrades to cater for the quantum of development envisaged. It is suggested by many submissions that this needs to be in place prior to future proposals on the lands.

It is stated that the draft Masterplan does not provide sufficient detail explaining how park areas and green spaces will be secured, funded and delivered.

Landowners/Businesses

A query was raised over the intention for the sub-areas within each phase and how these are intended to be delivered. Most specifically, it was queried if the sequential approach intended for development of these lands, anticipates lands designated as 1A to come forward first, followed by lands in 1B, 1C and so on. It was requested that that there should be no impediment to bringing forward residential development proposals on any sub-area within phase 1.

Requests were also made for the provision of infrastructure equalisation measures between landowners, so that the delivery of key roads, drainage, and all other essential infrastructure could be equitably managed. It was suggested that this be managed via Section 48 Development Contributions and/or Section 49 Supplementary Development Contributions of the Planning and Development Act, 2000, as amended. The suggestion was made that where landowners who contribute less than the proportionate amount to overall open space and infrastructure required for the Masterplan lands would pay an additional development contribution; and landowners who contribute more than their shared requirement or who provide facilities for the benefit of others can receive an offset against development contributions. If no development contributions are payable under national policy, then the

mechanism should provide for a proportionate redistribution between landowners. It is claimed that the Plan does not provide a coordinated mechanism to assure a coordinated approach to infrastructure delivery across the Draft Masterplan site.

The following site-specific comments/requests were made by landowners:

Ardez

Lands are available for Phase 1 redevelopment. The submission makes reference to the proposed access road to serve Polonez and Finglas Auto Parks, as per Figure 6.4, and requests that this arrangement is made possible. Clarity is sought on the delivery of long-term access to this site.

Burgess Galvin & Co

The submission requests to be moved to Phase 2, and not Phase 3 as currently allocated, in the interests of sequential development aspects of the Plan, and states that the site “may become available for redevelopment in the medium term”. The submission seeks greater flexibility in terms of phasing, and specifically requests the following text at the foot of Table 6.1:

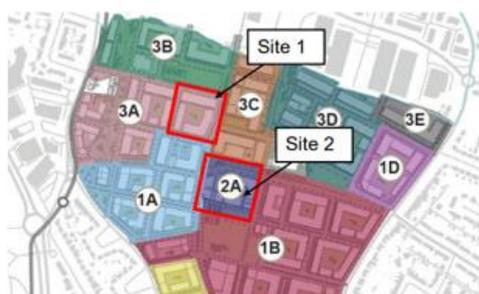
“Should a Phase 2 or Phase 3 site become available for redevelopment in the medium term, its redevelopment can be facilitated on its own merits in the context of the overall Masterplan, in order to provide for the regeneration of the Masterplan area, in accordance with the objectives of the City Development Plan, in a timely manner.”

Manhattan Peanuts Ltd

The submission states that the proposed school site restricts the expansion of the Manhattan Peanuts operation which is contrary to the Masterplan statement to support existing uses, whilst facilitating change.

Development 8

The submission seeks specific changes to the phasing strategy, to reflect when some sites will become available, as shown below. It also seeks more flexibility in allowing sites in Phase 2 or 3 to come forward for development at an earlier stage, based on its merits and in the context of the overall Masterplan.



Site 1: seek to include in Phase 1C or 2A – will be available in short term
Site 2: seek to include in Phase 1C (currently 2A)

Finglas Regeneration Ltd

The submission states that Finglas Regeneration Ltd group, whose lands are shown within Phase 1, are keen to proceed to pre-planning stages and detailed design. The submission seeks a statement requested that sub-areas do not represent sequential system for bringing forward development. Specific amendments sought include:

- The following statement should not be construed as requiring the delivery of services exclusive and ahead of the delivery of housing: 'In general, the first applications should include provision of essential community infrastructure and public open space to avoid piecemeal build out of lands.' Request replaced with 'In general, the first applications for residential and commercial/employment mixed use development, where relevant, should include provision of essential community infrastructure and public open space to avoid piecemeal build out of lands.'
- In relation to the following statement clarity on the specifics and level of detail required for delivery of the Masterplan is requested: 'Where proposals are lodged for part of a sub-area, or on all or part of individual urban blocks within a landholding or sub-area, a detailed Masterplan will be required to demonstrate compliance with this Masterplan to ensure the coordinated delivery of essential community and social infrastructure and the urban structure'.

KSG

This group has appointed a design team and is preparing a planning application for their lands, located within Phase 1. The submission expresses concerns over a further variation to the DCDP to incorporate the Masterplan, and request that the variation process is not a precondition to the submission of planning applications to redevelop.

With regard to the specific measures to support existing uses while facilitating change (Figure 6.4), insofar as is practical and reasonable, KSG state that they can make provision for access to the Manhattan Peanuts and Murdock's site to be provided from a new access street off McKee Avenue to the property boundary.

TAM Ireland

Concerns are raised that the precise land ownership boundaries of TAM Ireland are not reflected in area sub-area IC and that this may have implications for the delivery of the scheme.

An Post

An Post operates a Delivery Service Unit (DSC) within the Jamestown Business Park, within an area designated for Phase 3 redevelopment, sub area 3C. The submission requests that the operational requirements of the existing An Post Service are taken into account in considering proposals for new residential, community and educational uses in this area. An Post's operational requirements including inter alia HGV's, deliveries, early/late operational hours etc. and these elements are of critical importance to the public service they provide. The submission is seeking certainty that the existing operation can continue undisrupted, and that the Masterplan address the inter-relationship between existing operations and new development.

Chief Executive's Response

Phasing and sub-areas

The phasing strategy set out in the draft Masterplan includes 3 phases and a number of different sub-areas. These phases were based on discussions with land owners as to when sites may come forward for development and on the requirement for sequential development. This approach allows the northern lands to continue to function as largely employment areas in the interim, with the exception of the Jamestown Village site, which is a large vacant site next to Jamestown Road and also with the exception of Johnston Mooney and O'Brien to the south, which is also an independent site with no connectivity with the lands to the north. This approach allows a significant degree of separation between heavy vehicular traffic associated with the employment uses/noisy areas and a more traffic calmed, pedestrian and cycle environment within the emerging Phase 1 lands.

Several requests were received from landowners to move lands from Phase 3 to Phase 2, and one request to move the only phase 2 site (2A) into Phase 1. The moving of site 2A into Phase 1 is welcomed as this site is bounded by Phase 1 sites on three sides, and importantly it will allow for the completion of: the key public open space; the continuation of the east-west swale/linear park; and the delivery of the community/cultural hub. It is therefore recommended to change the phasing of site 2A from Phase 2 to Phase 1. This change will have minor implications to the overall number of units achievable within phase 1. All Phase 3 sites will subsequently be reclassified as Phase 2 and Figure 6.2 will be updated accordingly. In the interest of clarity, new text is recommended to frame the phases, indicating that Phase 1 is for sites likely to come forward for redevelopment within the lifetime of the current Development Plan. Phase 2 relates to sites suitable/available for redevelopment in the medium to long term and will be subject to further review as part of the Development Plan review and taking into account the proposed Fingal County Council Framework Plan for the lands to the immediate north. Should an additional Phase 2 site become available in the shorter term (within the current Development Plan), then it is considered reasonable that it could be considered, however it must demonstrate sequential development and must be in accordance with the Masterplan. New text reflecting this is proposed.

For clarity the sub-areas identified within Figure 6.3 are not intended to be sequential and new text will be inserted to clarify this.

Requests for certainty on the timelines for all phases coming forward are not possible to specify. This 43 ha site is privately owned by multiple landowners, many of whom have varied leaseholds in place. What the Masterplan does is provide the framework to allow schemes to come forward independently, each contributing to the overall vision of the area, and delivering much need housing, amenities and employment in this locality. If some landowners are not in a position to bring forward development, or wish to retain their existing operations, this should not prejudice other developments that are consistent with the Masterplan. The Masterplan does however require some landowners to work collaboratively in certain instances on the provision of access roads and open spaces in order to provide a rational and structured urban form that does not always follow ownership boundaries. Minor deviations or temporary arrangements may be considered where it can be demonstrated that such arrangements are not feasible. It is proposed to insert new text to allow for such minor deviations to the Masterplan.

Timely delivery of services and amenities

The requirements set out in the Masterplan, taken together with the Development Plan objective CUO25 and the need for supporting documentation to accompany planning applications (as per Table 15-1 of the Development Plan) which includes the need for a Community and Social Audit, will ensure the timely and appropriate provision of local services

and amenities. It is not considered appropriate to specify exactly which site will deliver which community/social/cultural amenity, as there is no guarantee which sites will come forward for development first. The City Council undertook a detailed community audit for the Finglas area as part of the Finglas Strategy 2021, which informed the SDRA, however it is a requirement that each individual planning application must provide an up-to-date community and social audit that reflects the local position at the time of submitting a planning application, as per the Development Plan requirements. The requirement for each sub-area to identify how services such as local open space, roads and utilities will be provided will also be a key consideration. One of the landowner submissions seeks a minor amendment to the text dealing with the delivery of essential community infrastructure and public open space, to clarify that these amenities take place in tandem with the first application for residential and/or commercial development. New text is proposed to clarify this.

Requests to delay the delivery of any new development until the Luas Finglas is operation, has also been dealt with under Section 2.3.4 Urban Form and Design above. These lands are zoned for strategic regeneration purposes, taking into account government policy for the delivery of Finglas Luas as clearly articulated within the NTA's Transport Strategy for the Greater Dublin Area 2022-2042. The delivery of development on these lands will support the public investment in Finglas Luas and BusConnects.

The timing on the delivery of the new school is a matter for the Department of Education. The Masterplan has set out a site that is available for development within Phase 1, thus enabling early delivery of this key amenity.

Having regard to infrastructure such as foul and surface water drainage, table 6.1 adequately addresses concerns raised. However, for clarity it is recommended to update table 6.1 to reflect the requirement for a Surface Water Management Plan to be prepared and agreed prior to the submission of any planning applications.

Existing operators

Some concerns were expressed as to how existing operators will continue to run their businesses as regeneration commences. The draft Masterplan specifically deals with this issue stating that "it is imperative that existing employers and established uses are supported as the lands transition from a predominantly manufacturing / industrial focus towards a mixed-use residential development." The urban structure, design and land use has sought to minimise conflict between established commercial uses and future development sites. The plan also states that mitigating measures may be required where potential impacts arise. Such measures may include the provision of addition set-backs, landscaping treatment, temporary access roads etc. All such measures will be assessed at individual planning application stage.

With regard to the specific measures to support access to users along St Margaret's Road, namely Manhattan Peanuts, Murdocks, Polonez and Finglas Auto Parts, whose businesses will be impacted upon by the proposed Luas Finglas, these new access roads have been carefully considered in consultation with the NTA. The Chief Executive particularly welcomes the submission from the NTA confirming the intention to include within the Railway Order, access routes in keeping with the provisions of the draft Jamestown Masterplan.

Having regard to concerns raised by Manhattan Peanuts regarding the identified school site and its potential to restrict or hinder their current business operations, it is emphasised that the draft Masterplan contains site specific measures on page 26 supporting the current operations of Manhattan Peanuts. Furthermore, following a submission received from the Department of Education regarding the potential review of school sites based on identified requirements, text will be updated in Chapter 5 stating that if this site is no longer required by the Department of Education to provide a primary school, it shall revert to 'residential led mixed use'.

Land Equalisation/ Development Contributions

A number of the landowners have called upon Dublin City Council to introduce land equalisation measures on the basis that some landowners are providing more open space than others, more road infrastructure, more community facilities (community hub), whilst others are requested to day-light streams and water channels. These key infrastructural requirements each bear a cost, in terms of land or finance, and are all critically vital to the success of the area.

The first point to make on this issue is that Dublin City Council is not the regeneration authority for implementation of these lands. The City Council, as the Planning Authority has rezoned the lands at this location to facilitate regeneration and intensification of strategically placed land and is seeking to put in place a Masterplan framework that will guide future redevelopment in a coherent and equitable manner.

The Dublin City Development Plan provides some scope for various landowners to work together collaboratively with regard to the provision of community, arts and cultural spaces. Objective CUO25 allows for the relocation of a portion of these uses (no more 2.5%) to sites immediately adjacent. As recommended above under Section 2.3.5 Land Use and Function, wording is proposed that allows for this off-set to be included in the central community hub, from any lands within the SDRA/ Masterplan boundary. Other flexibility arises from the provision of public open space. Where some urban blocks / landholdings do not include a requirement for key public open space, then a development contribution in lieu of the typical 10% public open space requirement, will be accepted, subject to agreement.

The draft Masterplan does however specifically state that “All measures and funding streams available to provide for the delivery of key infrastructure and community facilities in Jamestown will be pursued in conjunction with landowners/developers”. This commitment is retained, and the Council will continue to liaise with landowners on opportunities that may arise. The City Council will also consider the possibility of development contributions, but it is noted that the provision of such is subject to a separate process. Such a scheme can only be considered following on from the adoption of an agreed plan.

Chief Executive’s Recommendation

It is recommended to update the draft Masterplan to include the following text.

Chapter 6: Phasing & Sequencing

Page: 24

Amendment

Amend, insert the following text:

Overall phasing is considered in ~~(three)~~ **{two}** phases with a number of sub-areas identified which considers landownerships and the delivery of essential infrastructure such as open space, surface water drainage and the street network.

{Phase One sites are expected to come forward for redevelopment in the short to medium term, in keeping with the Dublin City Development Plan 2022-2028 timeframe. Phase Two sites are expected to come forward for redevelopment in the medium to long term and will be subject to review as part of the next Dublin City Development Plan and will take account of proposals by Fingal County Council for a new Framework Plan on lands to the immediate north of the Masterplan}.

{Should a Phase 2 site become available for redevelopment within the life of the current Dublin City Development Plan 2022-2028, its redevelopment can be considered providing it demonstrates sequential redevelopment, provides a quality environment for new residents/businesses and is in keeping with the context of the overall Masterplan.}

The First applications within each of the designated sub-areas **{as set out in Figure 6.3}** will be required to demonstrate compliance with this Masterplan, including the provision of public open space, surface water drainage, community and social infrastructure. **{These sub-areas are not indicative of sequential development.}** Where proposals are lodged for part of a sub-area, or on all or part of individual urban blocks within a landholding or sub-area, a detailed Masterplan will be required to demonstrate compliance with this Masterplan to ensure the coordinated delivery of essential community and social infrastructure and the urban structure.

Where the provision of the key access streets, public open space or SuDS extends across landownership boundaries, applicants will be required to demonstrate the coordinated delivery of this essential infrastructure as part of proposals. **{Minor deviations to the Masterplan or the installation of temporary arrangements may be permitted in limited circumstances where it can be demonstrated to the satisfaction of the planning authority that this is not achievable in the short term. Such an agreement must be agreed with the planning authority in advance of submitting a planning application.}**

In general, the first planning applications lodged **{for residential and commercial/employment mixed use development,}** should include the provision of essential community infrastructure and public open space, to avoid the piecemeal build out of lands.

Chapter 6: Phasing & Sequencing

Figure 6.2 Development Phases

Page 24

Amendment

Update figure 6.2 to reflect the changes to phasing outlined.

Chapter 6: Phasing & Sequencing

Figure 6.3 Sub-areas

Page 25

Include sub-area 2A in sub-area 1B.

Include the identified site in 3A to the immediate north of the school site into sub-area 1A.

Chapter 6: Phasing & Sequencing

Figure 6.4 Phase 1 – facilitating change

Page: 26

Update figure 6.4 to reflect changes to the phase 1 boundary.

Chapter 6: Phasing & Sequencing

Table 6.1 Sequencing of development

Page: 25

Amendment

Insert the following:

Phase	Key infrastructure / requirements	Stakeholder
Phase 1	<u>{A Surface Water Management Plan (SWMP) shall be prepared for the entire masterplan by the landowners/developers and agreed with the planning authority in advance of the lodgement of any planning applications. The SWMP shall demonstrate compliance with the requirements and objectives set out in the Surface Water Management Strategy.}</u>	<u>{Developer/Landowner}</u>

Chapter 6: Phasing & Sequencing

Page: 6

Amendment:

Page: 25

Amendment:

Insert the following:

Phase	Key infrastructure / requirements	Stakeholder
Phase 1	<u>{Preparation of a Mobility Management Plan to address the detailed control and management of traffic and how local access and business traffic will be managed,}</u>	<u>{Developer/Landowner}</u>

Phase	Key infrastructure / requirements	Stakeholder
	<u>having regard to phasing and sequencing of sites}</u>	

Chapter 6: Phasing & Sequencing

Table 6.1

Page: 25

Amendment:

Insert the following:

Phase	Key infrastructure / requirements	Stakeholder
Phase 2 (and Phase 3)	<u>{Primary school}</u>	<u>{Department of Education}</u>

Chapter 6: Phasing & Sequencing

Table 6.1 Sequencing of development

Page: 25

Amendment

Insert the following:

Phase	Key infrastructure / requirements	Stakeholder
Phase 2 (and Phase 3)	<u>{Delivery of social and affordable housing as part of any redevelopment of the ESB lands.}</u>	<u>{ESB, Land Development Agency, DCC, Fingal County Council}</u>

Chapter 6: Phasing & Sequencing

Funding and implementation

Page: 26

Amendment

All measures and funding streams available to provide for the delivery of key infrastructure and community facilities in Jamestown will be pursued in conjunction with landowners/developers. {The role of the Land Development Agency in unlocking relevant

public land to provide for sustainable, social and affordable housing is recognised. Dublin City Council will support the Land Development Agency should the ESB lands be redeveloped, in association with the ESB, Fingal County Council and all relevant stakeholders.}

Chapter 1: Introduction & Vision

Development Capacity

Page: 2

Amendment:

Insert the below text in the third paragraph:

Approximately ~~(22)~~ {24.6} ha of the lands are classified as immediately available, with the remaining lands expected to support their current industrial/employment uses over the medium to long term. In the context of the Dublin City Development Plan 2022-2028, it is anticipated that planning permissions facilitating up to ~~(2,300)~~ {2,600} homes may be granted, at a ratio of approximately 75% residential, 10% employment/commercial, supported by approximately 15% community and education.

2.3.7 Issues raised by theme

Planning legislation and procedural matters

Summary

Many submissions received were against the principle of redevelopment on the lands, with many referencing previous observations submitted as part of the variation to the previous Development Plan. Some submission expressed the view that alternative sites or locations should be considered. A large number of submissions have expressed strong objections to the development of apartments and taller buildings in general, with many references to the social issues experienced in Ballymun.

Some submissions raised concerns regarding the governance and procedures followed during the preparation of the draft Masterplan for the Jamestown lands and in particular expressed regret that the lands were re-zoned prior to the preparation of a Masterplan. One submission expresses dissatisfaction that the lands were subject to re-zoning by way of a variation to the previous Development Plan and not considered as part of the 2022-2028 Development Plan process. A request was made that the draft Masterplan be brought before both the Area Committee and the full Council for a vote.

One submission is concerned that the Masterplan process is experimental and raises doubts that the proper resources and planning are invested in the process for the area to become an example of positive regeneration and development. It is also noted by some that the draft Masterplan does not incorporate previous studies prepared for the area.

Several submissions claim that some local businesses were unaware of the on-going Masterplan and state that insufficient consultation has taken place, particularly with businesses who do not wish to redevelop. Clarity is requested regarding consultation and collaboration with Fingal County Council regarding the lands to the north. Several submissions have also queried the commitment of the Department of Education to acquire the identified school site, with some questioning the procedure and the level of consultation on this matter.

A number of concerns were also raised about the planning process in general. In particular, the former Strategic Housing Development planning process was criticised and a recent decision by An Bord Pleanála within the lands was considered to undermine the enforceability of the Masterplan. Some submissions criticised, while others questioned the diminished ability of Development Plans and Masterplans to control aspects of development proposals such as height, density, typology and tenure, referencing the power of various national planning guidelines. To this end, clarity on the enforceability of this Masterplan is sought.

Many submissions have raised concerns that regeneration and redevelopment will take many years, noting that many of the lands are not considering redevelopment opportunities at present. It is claimed that this will lead to piecemeal development and that proposals should consider the entire masterplan lands to ensure the provision of infrastructure and amenities.

Chief Executive's Response

The principle of redevelopment and regeneration is established in the Dublin City Development Plan 2022-2028. The lands were re-zoned to Z14 (Strategic Development and Regeneration Area) and subject to a Strategic Development and Regeneration Area (SDRA) designation by way of variation (variation 33 of the Dublin City Development Plan 2016-2022) by the elected members of Dublin City Council on 14th June 2021. It is a requirement of SDRA 3 of the current Development Plan that a Masterplan be prepared to guide the future redevelopment of the Jamestown lands. Therefore the principle of change and regeneration is established Council policy and debating the merits are not part of this consultation process.

Dublin City Council has undertaken extensive consultation with all registered landowners and/or their representatives within the Masterplan area prior to the publication of the draft. A number of landowner events have taken place since the adoption of variation no. 33. It is also noted that some businesses lease premises. In such cases, the onus is on landowners to communicate with their tenants. Furthermore, consultation with stakeholders to include Fingal County Council and the Department of Education have taken place and have informed the draft Masterplan. Full details of the consultation process that has taken place during the public consultation period for the draft Masterplan is outlined in Section 1.2.

Planning legislation and policy are legally formulated and adopted by the Oireachtas (the President of Ireland, Seanad Éireann and Dáil Éireann). This included the establishment of the former Strategic Housing Development planning process and Section 28 Ministerial planning guidelines and rules concerning judicial review of planning decisions. DCC as a local authority is responsible for delivering the planning service within the legislative and policy framework established by the Oireachtas. The City Council cannot act illegally by formulating or implementing planning legislation and policy independent of the Oireachtas.

Brownfield regeneration by its very nature is complex and will take many years to implement. Dublin City Council cannot restrict landowners coming forward for redevelopment on the basis that a number of other businesses wish to continue operating. Dublin City Council supports all businesses that wish to continue their operations on site. However, it is also aware that a large number of landowners wish to redevelop. The draft Masterplan supports this approach and establishes a phasing and implementation strategy that responds to this.

Chief Executive's Recommendation

No change recommended.

Development Management requirements and detailed design

Summary

Many submissions have articulated concerns in relation to the requirement for an Environmental Impact Assessment (EIA). Specifically, concerns are raised that development proposals may prepare EIAs for individual sites but not consider the overall cumulative impacts. Some submissions have requested that the City Council scope out, manage and commission an EIA, although it is acknowledged that it may not be considered a legal requirement.

Many submissions articulate concerns regarding the lack of detail regarding parking and traffic management in the draft Masterplan. Several submissions have expressed concerns that reduced car parking will lead to unmanaged on-street parking on surrounding streets.

Several submissions note that the draft Masterplan provides no clarity regarding the upgrading of water and sewage in the area, noting significant issues in the immediate environs relating to capacity, water pressure. Some submissions have questioned how this infrastructure will be funded.

Chief Executive's Response

An Environmental Impact Assessment (EIA) is the process of determining whether a proposed project will have anticipated effects on the environment. The requirement to prepare an Environment Impact Assessment EIA comes from EU environmental policy. The initial Directive of 1985 and its three amendments have been codified by Directive 2011/92/EU of 13th December 2011. Directive 2011/92/EU has been amended in 2014 by Directive 2014/52/EU. The EIA Directive is transposed into Irish legislation by the Planning and Development Act 2000 (as amended) and the Planning and Development Regulations 2001 (as amended). The draft Jamestown Masterplan is a land use plan. Land use plans are subject to Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) screenings. The draft Masterplan was subject to SEA and AA screenings and determinations, in consultation with the prescribed environmental authorities. These determinations were published and made available for public consultation. The Dublin City Development Plan 2022-2028 was subject to detailed SEA and AA. Individual planning applications will be considered in accordance with the legislative requirements to carry out an EIA. This can only be

determined based on the scale and nature of a given proposal. The Planning and Development Act 2000 (as amended) and the Planning and Development Regulations 2002 (as amended) set out the thresholds for determining mandatory EIA and sub threshold EIA. Determining whether an EIA is required is a development management matter.

The final Masterplan will sit within the operational requirements of the Development Plan. Parking requirements will be assessed at planning application stage, as part of detailed design proposals. The Development Plan sets out the maximum car parking standards based on a zonal approach which is based on location and proximity to public transport nodes and corridors. Parking is not a matter for consideration at this stage but will be assessed in detail as part of planning applications. Traffic management will also be considered as part of the detailed design phase of streets and as part of any proposed developments. This matter is addressed in response to the submission received from the NTA in section 2.2.9 and under section 2.3.2, Chapter 2 – Urban Structure.

Connections and upgrades to surface and foul water are a matter that will be assessed as part of detailed design proposals. However, the draft Masterplan acknowledges that upgrades to essential infrastructure is required and must be addressed as part of detailed design proposals.

Chief Executive's Recommendation

No change is recommended.

Construction Management

Summary

Many submissions expressed concerns in relation to future construction, including associated noise, dust and pest control.

Many submissions also raised concerns over the presence of asbestos in buildings within the industrial estates, raising health and safety concerns over air-borne particles once broken up during construction/demolition works.

Concerns have been expressed regarding crane use and the impacts this might have on the operations of Dublin Airport.

It has been noted that there is no detail regarding soil toxicity and how this will be addressed as part of future developments.

Chief Executive's Response

The design and construction of buildings are regulated under the Building Controls Acts 1990 to 2014 to ensure the safety of people within the built environment. These are not matters for the Masterplan but can be dealt with at individual planning application stage. The Dublin City Development Plan requires the submission of a Construction, Demolition and Waste Management Plan as part of any proposal for 30 or more residential units or 1,000 sq.m. or more of commercial buildings, see Section 15.18 Environmental Management of the Development Plan for reference.

Chief Executive's Recommendation

No change is recommended.

Housing tenure

Summary

Concerns are raised regarding the lack of clarity or certainty regarding the likely tenure mix that will be delivered across the lands. The opinion is expressed that it is likely units will be for rental purposes only. It is stated that the City Council should define the most appropriate tenure mix between private owner occupier, affordable purchase homes, affordable rental homes and social housing, as well as an element of age-appropriate housing. It is stated that the relative percentages of these should be set out. It is stated that this should be set out in advance of any planning applications.

Chief Executive's Response

Having regard to concerns raised in relation to tenure and social mix, Part V of the Planning and Development Act 2000 (as amended) sets out the provision for social housing to be delivered through planning applications. 10% of all housing units for developments of five or more units, or on a site with an area greater than 0.1 hectares must provide for social housing. In addition, and subsequent to the provisions of the Affordable Housing Act 2021, an additional 10% social, affordable or cost rental provision may be required, dependent on when the land was acquired (as set out in the legislation). After 31 July 2026, all planning applications granted for housing developments will have a 20% Part V requirement, regardless of when the land was purchased.

Chief Executive's Recommendation

No change is recommended.

Traffic congestion and safety

Summary

It is noted that traffic congestion on McKee Avenue, Jamestown Road and Finglas Village is a significant issue. It is noted that upgrade works to the St Margaret's Road/McKee Avenue and Jamestown Road/Melville Road roundabouts has not commenced. Dissatisfaction is also expressed regarding the lack of progress concerning the proposed upgrades to the five-arm junction in the village, noted by some that the delay was due to the NTA reviewing the designs. It is stated that new arrangements for the village cannot be separate to the draft Masterplan. It is stated that the draft Masterplan fails to sufficiently address traffic management and the ability of the local road network to absorb additional traffic generated from any new developments. It is also stated that the success of the development is predicated on the delivery of Luas Finglas. Doubts regarding the timeline for delivery of this project are expressed.

Concerns are outlined relating to traffic congestion on McKee Avenue, Jamestown Road and Finglas village. It is stated that traffic management is not addressed in the draft Masterplan. Concerns are raised regarding potential delays to planned public transport. It is requested that a traffic management plan for the entire site is needed.

It is requested that further detail is required explaining how the Masterplan will alleviate traffic issues around the site and allow traffic to flow and successful examples are requested of similar development which contributed positively.

Chief Executive's Response

The purpose of the draft Masterplan is not to address traffic congestion and sustainable movement in the wider Finglas area but to create a new urban quarter that maximises opportunities for walking, cycling and provide access to public transport. The submission received from the NTA supports the strategic approach set out in the draft Masterplan. Specific movement related matters are addressed under Chapter 2 – Urban Structure and in response to the submission received from the NTA. Many of these concerns will be addressed as part of any planning applications lodged.

Chief Executive's Recommendation

No change is recommended.

Public transport

Summary

Concerns are expressed regarding potential delays to Luas Finglas and the impact this might have on the first phase of the Masterplan. Some have expressed the view that the Masterplan should not take into account Luas Finglas. Similar submissions have also expressed concerns regarding potential delays to BusConnects. A number of submissions have raised concerns regarding the lack of capacity on public buses.

Chief Executive's Response

The delivery of Luas Finglas and BusConnects are Government priorities, supported by Project Ireland 2040 and the National Development Plan 2021-2030. The strategic redevelopment of the Jamestown Lands supports and is supported by future public transportation.

The issue regarding public transport capacity is a matter for the respective transport provider and is not a planning matter.

Chief Executive's Recommendation

No change is recommended.

Anti-social activity

Summary

A number of submissions raised concerns over a lack of adequate Gardaí resources and existing problems with anti-social activity in the area. Fears were expressed that any increase in population and the provision of apartments will lead to increased levels of crime and more anti-social activity without the Gardaí resources in place.

Chief Executive's Response

An Garda Síochána are responsible for addressing anti-social behaviour under their legal powers. It is not a matter that can be addressed under the Planning and Development Act 2000 (as amended). However, planning applications are required to address safety through design as part of a community safety strategy, as outlined in Chapter 15 of the Development Plan.

Chief Executive's Recommendation

No change is recommended.

Lack of social and community infrastructure and services in the wider area

Summary

Several submissions have identified concerns relating to the lack of community and social services in the wider Finglas area and have voiced concerns that the redevelopment of the Jamestown lands will exacerbate existing limited services, including health and childcare in the absence of any new services proposed.

Chief Executive's Response

The draft Masterplan sets out the envisaged community and cultural uses that are required to support the future community of the area. Individual planning applications will be required to demonstrate how they comply with the final Masterplan and the provisions set out in the Development Plan regarding the provision of social and community infrastructure. These matters will be addressed as part of any planning applications. Dublin City Council is committed to continued investment in community facilities in the wider Finglas area to serve the new and existing population including: the current construction of a new public library; new sports facilities; and supporting the provision of new infrastructure by other key state bodies including the HSE and primary care.

Chief Executive's Recommendation

No change is recommended.

Miscellaneous

Summary

Several submissions were submitted with no written observation. Some submitted duplicate submissions.

Submission have also expressed concerns regarding future home ownership due to affordability issues.

Chief Executive's Response

All received submission have been reviewed and recorded in table 1.

The issue of housing affordability is addressed by national policy and legislation and cannot be addressed separately by the Masterplan. It is noted that the LDA have made a submission with regard to the possibility of lands being considered in the future for affordable housing and a recommendation is made in response to their submission.

Chief Executive's Recommendation

No change recommended.

3.0 Conclusion

This Chief Executive's Report on the submissions received during the public consultation process on the draft Jamestown Masterplan is hereby submitted to the Elected Members of DCC for consideration.

The Chief Executive intends for this Report to be considered and the draft Masterplan to be agreed at the City Council Meeting in July 2023.

Following this, the Chief Executive intends to commence a Variation to the Dublin City Development Plan 2022-2028, to update SDRA 3 by incorporating the Jamestown Masterplan.