

To the Lord Mayor and  
Members of Dublin City Council

Report No. 275/2019  
Report of the Chief Executive



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**DRAFT PARK WEST – CHERRY ORCHARD LOCAL AREA PLAN 2019  
CHIEF EXECUTIVE’S REPORT ON SUBMISSIONS FROM PUBLIC DISPLAY OF  
DRAFT PLAN**

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The report of the Chief Executive was issued to the members of the City Council on the 30<sup>th</sup> August 2019. An addendum was issued on the 5<sup>th</sup> September 2019, included below as Section 6.

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**Dublin City Council**  
**30<sup>th</sup> August 2019**

<b>1</b>	<b>INTRODUCTION.....</b>	<b>3</b>
1.1	FORMAT OF CHIEF EXECUTIVE’S REPORT.....	3
1.2	CONTEXT.....	3
<b>2</b>	<b>PROCESS TO DATE AND NEXT STEPS .....</b>	<b>4</b>
2.1	PRE-DRAFT CONSULTATION PROCESS (ISSUES PAPER).....	4
2.2	DRAFT PARK WEST – CHERRY ORCHARD LOCAL AREA PLAN 2019 PUBLIC CONSULTATION PROCESS.....	4
2.3	NEXT STEPS: ADOPTION / AMENDMENT OF PLAN .....	5
<b>3</b>	<b>SUBMISSION RECEIVED .....</b>	<b>6</b>
3.1	CHIEF EXECUTIVE’S RESPONSE TO PRESCRIBED BODIES.....	6
3.1.1	<i>Office of the Planning Regulator (OPR) (Submission No. 118).....</i>	<i>6</i>
3.1.2	<i>Department of Education &amp; Skills (DES), (Submission No. 120) .....</i>	<i>7</i>
3.1.3	<i>Department of Culture, Heritage and the Gaeltacht, (Submission No. 113) .....</i>	<i>9</i>
3.1.4	<i>Transport Infrastructure Ireland (TII), (Submission No. 117) .....</i>	<i>10</i>
3.1.5	<i>National Transport Authority (NTA), (Submission No. 82) .....</i>	<i>11</i>
3.1.6	<i>Irish Water (IW), (Submission No. 76).....</i>	<i>13</i>
3.1.7	<i>The Office of Public Works (OPW), (Submission No. 119) .....</i>	<i>15</i>
3.1.8	<i>Inland Fisheries Board, (Submission No. 56).....</i>	<i>16</i>
3.1.9	<i>South Dublin County Council (SDCC), (Submission No. 115) .....</i>	<i>18</i>
3.2	SUMMARY OF INDIVIDUAL SUBMISSIONS BY TOPIC AND RESPONSE FROM THE CHIEF EXECUTIVE 20	
3.2.1	<i>Chapter 1: Policy and Plans .....</i>	<i>20</i>
3.2.2	<i>Chapter 3: Vision .....</i>	<i>21</i>
3.2.3	<i>Chapter 4: Section 4.2: Urban Framework and Land Use Strategy.....</i>	<i>21</i>
3.2.4	<i>Chapter 4: Section: 4.3 Economic Development and Employment .....</i>	<i>24</i>
3.2.5	<i>Chapter 4: Section 4.4 Housing and Tenure .....</i>	<i>28</i>
3.2.6	<i>Chapter 4: Section 4.5 Access and Movement (Traffic and Transport) .....</i>	<i>29</i>
3.2.7	<i>Chapter 4: Section 4.6: Urban Form and Design .....</i>	<i>34</i>
3.2.8	<i>Chapter 4: Section 4.7 Community, Education, Recreation and childcare Facilities ..</i>	<i>36</i>
3.2.9	<i>Chapter 4: Section 4.7.4 Equine Recreation: .....</i>	<i>39</i>
3.2.10	<i>Chapter 4: Section 4.75 Education and Section 4.76 Childcare .....</i>	<i>40</i>
3.2.11	<i>Chapter 4: Section 4.9 Green Infrastructure &amp; Biodiversity.....</i>	<i>41</i>
3.2.12	<i>Chapter 4; Section 4.10 Physical Infrastructure .....</i>	<i>44</i>
3.2.13	<i>Chapter 5: Site 2.....</i>	<i>46</i>
3.2.14	<i>Chapter 5: Site 3a.....</i>	<i>46</i>
3.2.15	<i>Chapter 5: Site 4.....</i>	<i>48</i>
3.2.16	<i>Chapter 5: Site 5.....</i>	<i>49</i>
3.2.17	<i>Chapter 5: Site 6.....</i>	<i>51</i>
3.2.18	<i>Chapter 5: Site 7 &amp; 8 .....</i>	<i>52</i>
3.2.19	<i>Miscellaneous Submissions .....</i>	<i>52</i>
<b>4</b>	<b>OVERALL SUMMARY OF SUBMISSIONS AND RECOMMENDATION.....</b>	<b>53</b>
<b>5</b>	<b>CONCLUSION AND CHIEF EXECUTIVE’S RECOMMENDATION .....</b>	<b>54</b>
	<b>APPENDIX 1: LIST OF ALL PERSONS OR BODIES THAT MADE SUBMISSIONS/ OBSERVATIONS ON THE DRAFT PARK WEST – CHERRY ORCHARD LOCAL AREA PLAN.</b>	<b>55</b>
<b>6</b>	<b>ADDENDUM .....</b>	<b>60</b>
3.2.20	CHAPTER 6: PHASING AND IMPLEMENTATION .....	61

# 1 Introduction

This Chief Executive's Report forms part of the statutory procedure for the preparation of a local area plan as required by Section 20 of the Planning and Development Acts 2000 (as amended). It consists of the Report and Recommendation of the Chief Executive on the submissions or observations received on the Draft Park West - Cherry Orchard Local Area Plan 2019.

## 1.1 Format of Chief Executive's Report

This report contains the following: -

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

Minor typographical or graphical errors or discrepancies will be amended in the final local area plan and have not been included in this report, for example the site numbers as shown on page 63, Section 5.1 Site Briefs, map entitled *Overall Plan Showing Location of Site Briefs 1-8*, shows the correct site references; any divergence from this in other maps shall be corrected in the final plan. Similarly, where draft plans or policy documents referenced in the document have been up-dated or approved since the preparation of the draft plan, these will be amended accordingly in the final document.

## 1.2 Context

The Dublin City Development Plan 2016–2022 provides a clear spatial framework to guide the future growth and development of the city in a coherent, orderly and sustainable way, framed on a vision of sustainable city living and a Core Strategy seeking a :-

- compact, quality, green, connected city;
- prosperous, enterprising, creative city and
- the creation of sustainable neighbourhoods and communities

The Development Plan incorporates the Core Strategy principles into the settlement strategy which prioritises the inner city, Key District Centres (KDC) and Strategic Development and Regeneration Areas (SDRA), as the focus for investment and growth in order to achieve infrastructural and service delivery integration. The Park West-Cherry Orchard area is a designated Strategic Development and Regeneration Area. Table E of the City Development Plan 2016-2022 estimates the Park West - Cherry Orchard area as capable of delivering in the region of 2,000 new residential units.

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

Within the LAP area there is approximately 46 hectare of undeveloped land available for development – 31.7 ha of in Cherry Orchard and 14.3 ha in Park West. The lands within Cherry Orchard are currently all vacant sites under the ownership of Dublin City Council. The lands in Park West are largely vacant with some sites in use for car parking. These lands are also under a single ownership.

## **2 Process to Date and Next Steps**

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

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

An important step in making a Local Area Plan is to identify the issues for the local area from the point of view of local residents, business people, land owners, state bodies operating services in the area, and other interested stakeholders. To assist this process, the preparation of the draft local area plan began with initial research undertaken by the Planning and Property Development Department and discussions with the elected Councillors (presentation given to the South Central Area Committee (SCAC) on the 17<sup>th</sup> January 2018) regarding timescales and guiding principles for the area set out in the City Development Plan.

The Issues Paper (i.e. pre-draft local area plan) was subsequently prepared and put on public display for a four week period from 12<sup>th</sup> February 2018 – 29<sup>th</sup> March 2018 (both dates inclusive with public notification by way of a newspaper notice, use of the City Council website and social media accounts (facebook, twitter) and erection of local posters in the area.

During this period, the Issues Paper was made available for viewing at the City Council offices at Wood Quay, at the Orchard Community Development Centre, Cherry Orchard Grove, Dublin 10, Ballyfermot Community Civic Centre, Ballyfermot Road, Dublin 10 and on the Council's website <http://www.dublincity.ie/ParkWest-CherryOrchard-LAP>. In addition, members of the Planning Department were available locally in the area to assist with any queries on the following public consultation dates: -

- Monday, 26th February: Orchard Community Development Centre, 2.00 – 3.30pm
- Wednesday 7th March: Orchard Community Development Centre, 7.30 – 8.30pm
- Friday 16th March: Unit 11, The Plaza, Park West Business Park, 12.00-2.00pm
- Thursday 22nd March: Cherry Orchard Football Club, Elmdale, 6.30 – 8.00pm
- Saturday 24th March: Cherry Orchard Equine Centre, 12.00 – 1.00pm

Where possible these information sessions linked in with local activities to help maximise awareness.

Other consultation sessions included a “walk-about” with elected members of the Council and the Oireachtas (February 2018); a youth consultation which was co-organised and facilitated between Dublin City Council, Familibase and the Cherry Orchard Integrated Youth Service; and consultation with Cherry Orchard Running Club

A summary of the issues raised during this period was presented to elected members of the South Central Area Committee on the 16<sup>th</sup> May 2018 and to elected members of the City Council on the 11<sup>th</sup> June 2018, Report No. 136/2018. The motion to prepare a Draft LAP for the area was put and carried at this meeting. Following the pre-draft consultation process, the Draft LAP was prepared, taking into account the submissions received; and national; regional and City Council policy.

### **2.2 Draft Park West – Cherry Orchard Local Area Plan 2019 Public Consultation Process**

The Draft LAP, along with the accompanying Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment, was placed on public display for a period of 6 weeks from 11<sup>th</sup> June until 22<sup>st</sup> July (inclusive) during which time submissions and observations were invited. Public displays were erected for viewing in

the Orchard Community Development Centre, Ballyfermot Library, in the Ballyfermot Community Civic Centre, and in Dublin City Council's Civic Offices at Wood Quay and on-line at <http://www.dublincity.ie/ParkWest-CherryOrchard-LAP>. In addition to the statutory public notice (in the Independent Newspaper on the 11<sup>th</sup> June 2019), an advertisement was also placed in the Ballyfermot Echo for information purposes, (13<sup>th</sup> June 2019) and use was made of DCC social media accounts (facebook and twitter).

A copy of the draft LAP was sent to bodies prescribed under the Planning and Development Act 2000, as amended.

During the 6 week period a series of staffed public consultation sessions were organised to coincide with the consultation period, where planners were available to answer questions from members of the public. These sessions took place at each of the following locations on the following dates: -

Tuesday 18 <sup>th</sup> June:	09.30 - 12.00	Orchard Centre, Cherry Orchard
Tuesday 18 <sup>th</sup> June:	13:30 - 14.30	Unit 1, The Plaza, Park West
Tuesday 25 <sup>th</sup> June:	16.00 - 18.00	Ballyfermot Civic Centre, Ballyfermot Rd

In addition to the above an additional public consultation sessions was organized for Wednesday 26<sup>th</sup> June 14:00 – 15:00 at St Ultan's Primary School.

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

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

## 2.3 Next Steps: Adoption / Amendment of Plan

The elected members are invited to consider the Draft Park West – Cherry Orchard Local Area Plan and this Chief Executive's Report (30<sup>th</sup> August 2019), which marks the start of the period for member's consideration, during which time members of the City Council may submit motions for consideration (last day for motions, 13<sup>th</sup> September 2019) on submissions made during the public consultation process.

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

At the City Council meeting on the 7<sup>rd</sup> October 2017, the members of the Council may: -

**adopt the Plan as publically displayed;**

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

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

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

**revoke the plan.**

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

### **3 Submission Received**

A total of 126 no. submissions were received by Dublin City Council during the consultation period, please refer to Appendix 1 for list of names and/or organisations. The purpose of this report is to summarise these submissions and present the Chief Executive's recommendation.

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

All other submissions received are grouped together into themes, summarised and responded to within Section 3.2 below.

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

##### **3.1.1 Office of the Planning Regulator (OPR) (Submission No. 118)**

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

The OPR's submission noted states that the Draft LAP has been published in advance of the finalisation of the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly area, which appropriately addresses the national policies, and objectives of the NPF at a regional level.

Following the making of the RSES for the Eastern and Midland Regional Assembly, the Council is required to undertake a review of the Dublin City Development Plan 2016-22 to determine if it is consistent with the RSES and to commence a variation to the plan or the preparation of a new plan as appropriate.

Given these circumstances, the Council is requested to clearly state the interim status of the Park West-Cherry Orchard LAP and that it will be subject to a review exercise subsequent to the examination of the Dublin City Development Plan for consistency with the adopted RSES for the Eastern and Midland Regional Assembly. The OPR submission recommends the inclusion of a written objective to the effect of the above, in the LAP.

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

The Regional Spatial and Economic Strategy (RSES) was adopted by the members of the Eastern Midlands Regional Assembly on the 3<sup>rd</sup> May 2019, and it came into effect on Friday 28<sup>th</sup> June 2019.

The Draft Park West – Cherry Orchard LAP was published for public consultation on 11<sup>th</sup> June 2019, having had full regard to the adopted RSES and future proofed accordingly. It is proposed that minor changes are made to the wording of section 1.3.2 of the Draft LAP to acknowledge the change in status from the RSES being adopted to being in effect.

DCC is preparing a report and variation on the implications of the RSES for the City Development Plan which will be brought to the Council this autumn. As per section 18(4)(b) of the Planning and Development Act 2000 (as amended) the LAP will remain in force following any variation to the DCDP, except should the Plan conflict with said variation, whereby Section 19(2B) of the Act shall apply, i.e. where any objective of the local area plan is no longer consistent with the objectives of a development plan for the area, the planning authority shall as soon as may be (no later than one year following the making or amending of the plan), amend the LAP to ensure consistency. As noted above given that the LAP had the advantage of being published following the adoption of the RSES, it is not anticipated that any amendments will be required. Any alterations that

may arise will be carried out as per the Planning and Development Act 2000 (as amended).

**Chief Executive's Recommendation:**

Proposed Amendment No. 1:

Amend Section 1.3.2 (page 5 & 6);

Delete: ~~The Eastern and Midland Regional Assembly issues a draft Regional Spatial and Economic Strategy for public consultation in November 2018, which was approved on 3<sup>rd</sup> May 2019.~~

Replace with: **The Regional Spatial and Economic Strategy which was approved by the Eastern and Midland Regional Assembly in May 2019 came into effect on the 28<sup>th</sup> June 2019.**

Final sentence of this paragraph: ~~Once adopted~~ **This** statutory plan will act as a twelve year strategic planning and investment framework for the Dublin City Metropolitan Area.

Image (page 5): replace the image showing the front cover of the Draft RSES with the final published document.

Amend text to image on page 6 showing the Dublin Metropolitan Area Strategic Plan, as follows: *Extract from **Draft** Regional Spatial & Economic Strategy*

**3.1.2 Department of Education & Skills (DES), (Submission No. 120)**

**Submission Summary:**

The DES welcomes the provision of a primary school site as referenced in Chapter 5 (page 70 of the plan) and the location of this site adjacent to the proposed additional residential development within Park West.

The DES is of the view that there will probably be a requirement for a second primary school in the LAP area (the Cherry Orchard part of the area) should the projected population in all the identified sites materialise. The Department wishes to state that lands adjacent to existing schools should where possible be protected for future educational use to allow for expansion of these schools, subject to site suitability and agreement of the various stakeholders.

Additional post-primary school population will emerge from the development in the Park West/Cherry Orchard LAP area. The existing Ballyfermot post-primary schools may be able to cater for this additional demand or there may be a requirement to reserve a new post-primary school site in the adjoining Naas road brownfield area that could cater for both the additional population in Cherry Orchard/Park West and increased population emerging from any proposed additional development off the Naas road.

**Chief Executive's Response:**

Consultation between the LAP team and the DES during the pre-Draft stage led to provision being made for a new primary school site, as per section 4.7.5 of the Draft Plan and objective CS6 of the Plan: *It is an objective of Dublin City Council to seek the provision of a new primary school within Site No. 6, in conjunction with the Department of Education and Skills.*

With regard to the new proposal for a possible second primary school within Cherry Orchard, this provision does not currently form part of the Draft LAP. However taking on board the submission from the DES it is considered that there is sufficient space

surrounding the existing St. Ultan's National School, which could accommodate an expansion to St. Ultan's and/or the provision of a new school. This land which is owned by the Diocesan Trust is currently fenced off as part of the existing school boundary lands. It is zoned Z15 in the Dublin City Development Plan which allows for future school provision. To take account of this change, additional/ amended text is proposed to be inserted into section 4.7.5 of the LAP.

What is also important in the context of providing for future school provision at this site is the interface between a new school building and the future redesign of Cherry Orchard Park. Given that the park is a priority project for the LAP, it will be important for the design team to liaise closely with the DES, the Diocesan Trust and the existing school to ensure the best outcome for all is achieved.

With regards to the future need for post-primary schools, it is considered that this can be accommodated in the "regeneration" lands to the south of the Canal, or indeed to the immediate east of the proposed new school site in Site No. 6, subject to rezoning and Masterplanning for this area. DCC will continue to work with the DES in preparing plans for these areas.

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

#### Proposed Amendment No. 2:

Amend, insert new text into Section 4.7.5 Education (page 53)

2<sup>nd</sup> Paragraph, amend as follows: Consultation with this Department during the LAP preparation phase has identified a clear need for an additional primary school(s) in the area.

Insert new text at end of this section: **In addition, the LAP supports the expansion of the existing St. Ultan's NS and/or the provision of an additional primary school, within the Z15 lands surround the existing school. Currently underutilised these lands present a poor interface with the adjoining Cherry Orchard Park. It is considered that there is scope to provide new educational buildings which better relate to and make use of the adjoining park and its facilities.**

Amend Objective CS6 as follows: *It is an objective of Dublin City Council to seek the provision of a new primary school within Site No. 6, and the provision of additional primary school resources adjoining/ part of St. Ultan's NS, in conjunction with the Department of Education and Skills.*

#### Proposed Amendment No. 3:

Inset text into Section 4.7.1 Cherry Orchard Park as follows (page 52):

3<sup>rd</sup> Paragraph: It is hence an objective of the LAP to carry out a complete redesign of the park, which will be subject to further detailed public consultation, with **the Department of Education and Skills, the Diocesan Trust**, the local school, clubs and sporting organisations, and to ensure that this work occurs in tandem with the provision of new housing provision in the area.

#### Proposed Amendment No. 4:

Inset a new bullet point into Chapter 5: Amenity Development Sites; A: Cherry Orchard Park Site, under the heading of Development Objectives for the Site (page 73):

- **The Department of Education and Skills have stated that there may be a requirement for additional primary level educational resources in Cherry Orchard. This could take the form of an extension to the existing St. Ultan's NS or the provision of a new school. Consultation with this Department and**



with the Diocesan Trust will form an important role in determining the interface of the park with the adjoining school lands.

### 3.1.3 Department of Culture, Heritage and the Gaeltacht, (Submission No. 113)

#### Submission Summary:

The Department of Culture, Heritage and the Gaeltacht referenced a set of broad policy principles for the protection of archaeological heritage as set out in a document Framework and Principles for the Protection of the Archaeological Heritage, published by the then Department of Arts, Heritage, Gaeltacht and the Islands in 1999. Some key policy principles set down in the Framework document should be followed:-

1. The National Monuments Acts will be used to the fullest possible extent, in accordance with relevant international conventions, to secure the protection of the archaeological heritage.
2. Gathering of information about the archaeological heritage should not destroy any more of that heritage than is absolutely necessary.
3. There should always be a presumption in favour of the avoidance of developments impact on the archaeological heritage.
4. Preservation in situ of archaeological sites must be presumed to be the preferred option.
5. Where archaeological sites or monuments have to be removed as a result of development it is essential that the approach of preservation by record be applied i.e. that there be appropriate archaeological excavation and recording.
6. Proper archaeological assessment can ensure that the most appropriate approach to archaeological preservation is adopted.

#### Chief Executive's Response:

The LAP lands contain one known national monument, located in the vicinity of the Crescent apartment building at Park West, and believed to be an early Christian burial mound, see Section 2.8 Natural and Built Heritage: Archaeology and Section 4.8.2 Archaeological Heritage of the LAP; and Section 3.8.3 Archaeology of the SEA Environmental Report.

Due to the proximity of sites 6, 7 and 8 to this known National Monument, the LAP contains the following Objective, H2:

*It is an objective of Dublin City Council to safeguard known National Monument sites and to agree strategies for the protection of potential future sites in conjunction with the City Archaeologist, with particular reference to Sites 6, 7 and 8.*

In addition the site brief for Site no. 6 specifically states that archaeological testing shall be required.

Taking on board the submission from the Department of Culture, Heritage and the Gaeltacht, it is proposed to make minor amendments to the wording of the development objectives for Site no. 6, and to insert the same amended wording into the development objectives for Sites 7 and 8 in Chapter 5.

#### Chief Executive's Recommendation:

##### Proposed Amendment No. 5:

Amend text in Chapter 5: Site Brief, Site no. 6; Development Objectives for the Site (page 70), as follows:

- Archaeological testing shall be required **in keeping with the Framework and Principles for the Protection of the Archaeological Heritage (Department of Arts, Heritage, Gaeltacht and the Islands, 1999).**

Proposed Amendment No. 6:

Insert the following bullet point into Chapter 5: Site Brief, Site no. 7; Development Objectives for the Site (page 71), as follows:

- **Archaeological testing shall be required in keeping with the Framework and Principles for the Protection of the Archaeological Heritage (Department of Arts, Heritage, Gaeltacht and the Islands, 1999).**

Proposed Amendment No. 7:

Insert the following bullet point into Chapter 5: Site Brief, Site no. 8; Development Objectives for the Site (page 72), as follows:

- **Archaeological testing shall be required in keeping with the Framework and Principles for the Protection of the Archaeological Heritage (Department of Arts, Heritage, Gaeltacht and the Islands, 1999).**

### **3.1.4 Transport Infrastructure Ireland (TII), (Submission No. 117)**

**Submission Summary:**

The TII submission makes reference to the previous TII submission to the pre-draft stage of the Park West Cherry Orchard LAP by letter issued on 26 February 2018 (TIL-1800775).

In reviewing the Draft LAP, the TII submission notes in particular, Chapter 1: Introduction and Policy Context; Chapter 2: Local Area Context and Analysis, subsection 2.9.1 Transport and Movement; Chapter 4 Local Area Plan Development Strategy, section 4.5 Access and Movement Strategy. TII has also reviewed the Strategic Environment Assessment (SEA) accompanying the Draft LAP.

TII recognises that a draft development strategy that subdivides the LAP area into smaller "sites" is presented. In this regard, site nos. 3a, 4, 7 and 8, indicated for low to medium density development, are located adjacent to the M50. It is submitted that the location of the Draft LAP area relative to the M50 that acts as the western boundary of the LAP area does not appear to be reflected in the LAP in accordance with TII's earlier submission.

TII's earlier submission recommended the identification of noise mitigation measures for those areas adjacent to the M50 that are indicated for development and may be considered a sensitive noise receptors. It is acknowledged that section 4.6.7 reflects the submission in this regard; "Noise/Air pollution mitigation will need to be designed into the layout of developments adjacent to the M50. All planning applications for development proposals adjoining the M50 and the railway line shall submit a detailed assessment and mitigation strategy for noise and/or air quality."

**Chief Executive's Response:**

The LAP team received a submission from TII during the pre-draft stage of the LAP as referred in the TII submission on the Draft LAP. The pre-draft submission has informed the preparation of the Draft LAP.

In this regard noise and air pollution was carefully considered as part of the development strategy for the Park West Cherry Orchard area, in particular the Land Use Strategy for the LAP. The TII submission acknowledges that section 4.6.7 reflects the pre-draft submission in this regard; "Noise/Air pollution mitigation will need to be designed into the layout of developments adjacent to the M50. All planning applications for development proposals adjoining the M50 and the railway line shall submit a detailed assessment and mitigation strategy for noise and/or air quality."

The Noise/Air pollution mitigation requirements identified for development sites adjacent to the M50 as per above will be required to be addressed as part of the final design / layout proposals for these development sites. This requirement is further supported by section 4.6.7 Building Design and Quality and objective UD14 where it is an objective of the LAP "To seek the submission of detailed assessment mitigation strategy for noise and/or air, for all development proposals adjoining the M50 or railway line, as part of future planning applications."

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

##### Proposed Amendment No.8:

Amend, insert text into Section 4.6 Urban Form and Design Strategy (page 51), Objective UD14 as follows:

"To seek the submission of detailed assessment mitigation strategy for noise and/or air **quality**, for all development proposals adjoin the M50 or railway line, as part of future planning applications."

### **3.1.5 National Transport Authority (NTA), (Submission No. 82)**

#### **Submission Summary:**

The NTA's submission makes reference to their submission to the pre-draft stage of the Park West Cherry Orchard LAP and states that the NTA is satisfied that their recommendations have been brought forward into the Draft LAP. The submission also states that the Draft LAP is consistent with the Transport Strategy for the Greater Dublin Area 2016-2035, and only proposes some minor text suggestions to update / clarify on current investment priorities for transport infrastructure to serve the LAP lands.

#### **Bus Connects:**

In relation to the Bus Connects project the NTA make the following suggestions: The NTA submission states that while there are a number of strands to the Bus Connects programme, it is the (Core Bus Corridors (CBC) and the Metropolitan Bus Network Review that are most relevant to the planning process. As such it would be best to express these strands separately within the LAP.

The Liffey Valley (CBC) project, as currently perceived, will deliver full bus priority along Ballyfermot road running along the northern boundary of the LAP delivering benefits to the Plan area by delivering reduced journey times for residents and employees in the PARK

West Cherry Orchard area Design and planning work is ongoing for this project and an application to An Bord Pleanála is expected in 2020.

In addition and separately to the above, the ongoing Metropolitan Bus Network Review is seeking to enhance the level of service within the plan area in relation to the existing 79/A bus service providing improved links to the Cherry Orchard train station. A revised second draft (to be published in September 2019) is likely to further improve the offer for the Plan area in terms of frequency and connectivity to the city centre, heavy rail and LUAS. The revised network will also be more adaptable than the existing network in terms of its ability to expand and serve developing areas such as Parke West Cherry Orchard making use of emerging new links / roads as proposed within the Draft LAP.

#### DART Expansion:

As part of the DART expansion program, the NTA intends to deliver DART levels of service along the Dublin Kildare railway line using battery electric carriages which can run at higher speeds and higher frequencies than the existing diesel engines - in advance of the electrification and DART underground.

In addition to the above updates the NTA also make the following recommendations to clarify text in relation to two of the Movement Objectives:

MO13 – include reference to the National Cycle Manual

MO14 - insert the word "local" before "Park and Ride"

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

Consultation between the LAP team and the NTA during the pre-Draft stage led to many of the recommendations from the NTA being brought forward through many of the Movement Objectives of the Plan MO1 – MO15 along with a number of the Urban Design objectives of the Plan UD4, UD8 and UD10. As such the Plan is considered to be consistent with the NTA Transport Strategy for the Greater Dublin Area 2016-2035 by both the NTA and DCC. However, the Council is requested to update the Plan with some minor text suggestions to update / clarify on current investment priorities for transport infrastructure to serve the LAP lands as per below:

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

##### Proposed Amendment No. 9:

Amend Section 4.5.6 Movement Objectives (page 46);

Insert text into Objective MO13 as follows:

MO13: To ensure that all development proposals for new roads, streets and residential layouts comply with the 'Design Manual for Urban Roads and Streets' (DMURS, 2013) **and the NTA National Cycle Plan focusing** on the needs of pedestrian, cyclists and public transport.

##### Proposed Amendment No. 10:

Amend Section 4.5.6 Movement Objectives (page 46);

Insert text into Objective MO14 as follows:

MO14: To explore the potential for car parking facilities including **local** Park and Ride near Park West – Cherry Orchard train station.

Proposed Amendment No. 11:

Amend, insert new text into Section 4.5.3.1 Public Transport – Rail and LUAS (page 43)

Insert new text at end of this section: **As part of the DART expansion program, the NTA intends to deliver DART levels of service along the Dublin Kildare railway line battery electric carriages which can run at higher speeds and higher frequencies than the existing diesel engines. This will allow enhanced levels of service to operate along the line in advance of electrification and in advance of the DART underground.**

Proposed Amendment No. 12:

Amend, insert new text into Section 4.5.3.2 Public Transport – Bus (page 44)

Insert new text into para 2 section 4.5.3.2 creating two new additional paragraphs:

The National Transport Authority (NTA) is in the process of redesigning Dublin's bus system under the 'Bus Connects' project which will identify a network of high quality radial and orbital bus corridors. The project which aims to overhaul the current bus network system in the Dublin region has implications for the Park West – Cherry Orchard area which will avail of a high frequency bus network better connecting the area to the City Centre and other areas of the city such as University College Dublin. **While there are a number of strands to the Bus Connects programme, it is the (Core Bus Corridors (CBC) and the Metropolitan Bus Network Review that are most relevant to the planning process.**

**The Liffey Valley (CBC) project, as currently conceived, will deliver full bus priority along Ballyfermot road running along the northern boundary of the LAP delivering benefits to the Plan area by delivering reduced journey times for residents and employees in the PARK West Cherry Orchard area Design and planning work is ongoing for this project and an application to An Bord Pleanála is expected in 2020.**

**In addition and separately to the above, the ongoing Metropolitan Bus Network Review is seeking to enhance the level of service within the plan area in relation to the existing 79/A bus service providing improved links to the Cherry Orchard train station. A revised second draft (to be published in September 2019) is likely to further improve the offer for the Plan area in terms of frequency and connectivity to the city centre, heavy rail and LUAS. The revised network will also be more adaptable than the existing network in terms of its ability to expand and serve developing areas such as Parke West Cherry Orchard making use of emerging new links / roads as proposed within the Draft LAP.**

~~**It will involve slight alterations to existing routes through the area however the Draft Bus Connect Review published in 2018 envisaged that frequency of services in the area will be every 10 to 15 minutes along with faster, more reliable and predictable bus journeys.**~~ **The City Council will continue to work with and support the NTA in planning and implementing improvements and enhancements to the public transport network in the area.**

**3.1.6 Irish Water (IW), (Submission No. 76)**

**Submission Summary:**

The IW submission requests a number of minor text changes be made within section 4.10.3 Foul Drainage Infrastructure, to provide better clarity regarding some of the terminology used within the Plan. The submission also provides an update with regards to the current studies and surveys that are being undertaken to prepare a Drainage Area

Plan model for the area, and requests for additional text to be added to the Plan. The current estimated date for completion of the study is the end of 2020.

The IW submission also requests minor text changes to be made within section 4.10.4 Water Supply and provides updated text that further outlines IW strategy and objectives under the National Water Resource Plan (NWRP) to replace the existing 3<sup>rd</sup> paragraph.

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

Consultation between the LAP team and IW has been ongoing during the pre-Draft stage. It was agreed that further surveys and studies would be required to determine if the existing foul drainage infrastructure would be adequate to serve both the existing and future volumes. The IW submission on the Draft LAP provides an update with regards to the current studies and surveys that are being undertaken to prepare a Drainage Area Plan model for the area, which can now be added to the relevant section of the Plan

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

##### Proposed Amendment No. 13:

Amend and replace with new text as per below into Section 4.10.3 Foul Drainage Infrastructure (page 60);

Paragraph 2: Amend and replace text: Each of these boundaries provides physical constraints to the provision of new ~~surface-water~~ **waste water** infrastructure and the creation of new outfalls.

Paragraph 4: Amend and replace text: In order to service the identified development sites additional foul drainage infrastructure will be require to convey ~~runoff~~ **waste water** from these sites to the existing sewer network and connect to existing outfalls.

Paragraph 4: Insert additional new text at the end of paragraph: **IW are currently undertaking studies and the surveys to prepare a Drainage Area Plan and model for the area. The report and model will identify the main issues and propose solutions for same. The current estimated date for completion of the study is the end of 2020**

##### Proposed Amendment No.14:

Amend and replace with new text as per below into Section 4.10.4 Water Supply (page 60):

Paragraph 2 remove text: However, as a result of the piecemeal and incremental nature of how the area has developed it is necessary to review the LAP area in terms of the supply/capacity for ~~both~~ water

Paragraph 3: Remove and replace paragraph with new text: ~~Following further correspondence and feedback from Irish Water, it has been confirmed that there is a good water supply network in the area and there is good water supply network available. However, some of the existing older watermains (1950s/1960s) may need upgrading.~~

**As developments progress, Irish Water will need to model the required demand for water against latest network demands to ascertain local network upgrade requirements. New connections may be assigned on a first come, first served basis until any necessary capital works are completed. Local works will be developer led. Developers should engage early with IW through the IW New Connections or Pre-Connection Enquiry Process. IW will then assess and review the local network to develop a solution/options for the developer's proposals.**

**In line with Irish Water and RSES Objectives, the Water Supply Project for the East and Midlands Region, is key to securing a robust water supply for the region in the**

longer term. Irish Water is preparing for the future by developing the National Water Resources Plan (NWRP). The strategic plan for water services will outline how we move towards a sustainable, secure and reliable public drinking water supply over the next 25 years, whilst safeguarding the environment. The NWRP will outline how Irish Water intends to maintain the balance between the supply from water sources around the country and demand for drinking water over the short, medium and long-term. This will allow preparation for the future and ensure the provision of sufficient safe, clean drinking water to facilitate the social and economic growth of our country

### 3.1.7 The Office of Public Works (OPW), (Submission No. 119)

#### **Submission Summary:**

The OPW submission notes that there is a history of pluvial flooding in the area of Park West - Cherry Orchard and a history of fluvial flooding on parts of the Camac River to the south of the development area. The OPW acknowledge Dublin City Councils commitment to adhere to the Planning System and Flood Risk Management Guidelines within the SFRA provided.

The OPW recommend that capacity of the culverted sections of the Blackditch Stream, Galback Stream and Gallanstown Stream may need to be assessed to ensure that they are suitable to convey any additional runoff/flows from the proposed development sites. It may be particularly important to ensure that at any pinch points (such as the railway line crossing) are suitably designed to ensure that they are protected from blockages of any kind.

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

It is considered that the above recommendation is already covered more broadly within section 4.10.1 Proposed Surface Water Drainage Infrastructure. However, there is merit in making specific reference to the culverted sections of the Blackditch Stream, Galback Stream and Gallanstown Stream along with specific references to any pinch points (such as the railway line crossing) in order to highlight the importance of these as part of the overall assessment of the existing Surface Water Drainage Infrastructure.

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

##### Proposed Amendment No. 15:

Amend and replace with new text as per below into Section 4.10.1 Surface Water Drainage Infrastructure (page 59);

Para 1: Insert additional new text as follows: A survey should be carried out to determine if the existing surface water infrastructure is adequate to serve both the existing and future surface water volumes, **in particular the capacity of the culverted sections of the Blackditch Stream, Galback Stream and Gallanstown Stream and the culverted pinch point at the railway may need to be assessed to ensure that they are suitable to convey any additional runoff/flows from the proposed development sites and to ensure that they are suitably designed so that they are protected from blockages of any kind.**



### 3.1.8 Inland Fisheries Board, (Submission No. 56)

#### **Submission Summary:**

The LAP needs to protect the aquatic environment through protection of water quality, hydrological processes, biodiversity and protection of the physical environment. The LAP should protect existing natural floodplains and avoid development in such.

The LAP must demonstrate that there is sufficient capacity in the receiving sewerage drainage system and sufficient treatment capacity within the receiving waste water treatment plants to protect the integrity of the receiving waters at the point of discharge.

Under the EU Water Framework Directive (WFD) (2000/60/EC) DCC is legally obliged to protect the ecological status of river catchments and channels. Development within the LAP lands, adjacent to waterways (riparian buffer zones) should be managed so as to lessen the impact on these habitats, for example river corridors / buffer zones with a recommended minimum 10m undisturbed zone. The Plan should also include a clear policy on the use of clear span structures over fisheries waters to minimise the impact on fish passage and water flows.

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

A number of tributaries of the River Camac flow through the LAP lands as indicated in Fig 28: Existing Watercourses of the LAP and also in the SEA and Flood Risk Assessment. Currently all of the existing watercourses that flow through the LAP lands are culverted and mostly located in existing built up areas.

It is an objective of the LAP to support the implementation of the Water Framework Directive to improve the status of the Camac, through implementing best practice SuDS and potential works to streams as part of any future development within the LAP area and to support and facilitate the upgrade of existing surface water infrastructure where possible.

*Objective INF3: Support the Water Framework Directive for the rehabilitation of the Camac River through implementation of best practice SuDS infrastructure throughout the LAP lands in order to improve quality and control of outflow to the river Camac from the LAP land.*

Proposed amendments above responding to OPW and Irish Water are considered to address concerns relating to surface and foul water issues.

A riparian / buffer zone is as per the submission a vegetated area near a stream, which helps shade and partially protect a stream from the impact of adjacent land uses and it plays an important role in protecting and improving the water quality in associated watercourses. The LAP currently contains a riparian zone along the banks of the Grand Canal. Section 4.9.2 Proposed Green Infrastructure and Biodiversity Strategy, sets out three core green routes to be provided as part of the Plan, including along the northern boundary of the Grand Canal. This section states: *"In order to fully optimise the potential of the Grand Canal to act as a 'green corridor' it is imperative that any future development along its bank is set back to fully optimise its potential as a recreational amenity and as a biodiversity resource for the City. This is of particular importance for any proposals to develop the Gallanstown Waterworks Site.* It is proposed to insert new text into the above paragraph to require a minimum of a 10m set back from the water's edge, and to ensure that any new bridges allow for clear passage of fish and water flows.

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



Proposed Amendment No. 16:

Insert new text into Section 4.9.2 Proposed Green Infrastructure and Biodiversity Strategy;  
2. Along the north boundary of the Grand Canal, (page 56):

In order to fully optimise the potential of the Grand Canal to act as a “green corridor” it is imperative that any further development along its bank is set back a **minimum of 10 metres from the water’s edge** to fully optimise its potential as a recreation amenity and as a biodiversity resource for the City. This is of particular importance for any proposals to develop the Gallanstown Waterworks site. **The provision of a new pedestrian/ cycle bridge at this location shall ensure that any new structures put in place do not impact on fish passage or water flows.**

(See also additional amendments to this section, below under Green Infrastructure).

### 3.1.9 South Dublin County Council (SDCC), (Submission No. 115)

#### **Submission Summary:**

South Dublin County Council (SDCC) welcomes and supports the LAP, and acknowledges that it is in accordance with the NPF and the RSES with regards to the vision for the lands. The submission notes that the rezoning of the lands to the south of the LAP within SDCC, from “EE” enterprise and employment to “REGEN” has been adopted by the Elected Members of SDCC and is now in effect. The submission recommends that DCC considers the significant ongoing projects in the area and SDCC future plans for the Ballymount / Naas Road 'REGEN' zoned lands. It also refers to the URDF funding secured by both DCC and SDCC and the ongoing joint research and analysis of the industrial lands in both administrative areas.

The submission outlines a number of key issues for consideration, notably:

- Connectivity and Permeability – SDCC acknowledges and supports the provision of a new pedestrian/ cycle routes as shown set out in the LAP at the Gallanstown Waterworks site, and is supportive of future enhanced connections in light of the new 'REGEN' zoned lands to the south east of the LAP.
- Education Facilities – SDCC welcomes and supports the provision of a new primary school on Site No. 6 in the Draft LAP. The submission also acknowledges that future engagement between DCC, SDCC and the Department of Education and Skills is required in considering the wider context.
- Grand Canal Greenway - Welcomes and support proposals within the LAP to enhance linkages to the Grand Canal Greenway and the provision of recreational and sporting use, but cautions on the need on the need for ecological and environmental amenity to also be a priority.
- Scale and Density – the submission is supportive of the scale and density proposed within the LAP, which optimises the opportunity to develop these strategically located brownfield sites that are well served by public transport.
- SDCC recommends that DCC, in preparing the final LAP, considers the significant ongoing projects in the area and SDCC future plans for the Ballymount / Naas Road 'REGEN' zoned lands.

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

Taking on board that the proposed rezoning of lands to the immediate south of the LAP are now adopted and in effect, it is proposed that the LAP is amended accordingly to reflect this. Changes are proposed to the text under section 1.3.5 Other Relevant Plans & Policy; South Dublin County Council, and to Figures 9 and 10 which shows the land use plans for both DCC and SDCC (page 9 and 10).

The City Council is working in partnership with SDCC following the allocation of funding under the URDF scheme which is examining opportunities and constraints within DCC's "Z6" lands at Park West Industrial Park, and wider industrial zoned lands, in conjunction with SDCC newly zoned "regen" lands. As part of this process we will examine issues of further enhanced connectivity, school provisions etc. to serve this wider area, outside of the LAP lands.

With regard to the need to protect the ecological and environmental amenity of the canal, it is considered that the proposed amendments No. 16 (above) and No.32 (below), adequately addresses this concern.

## Chief Executive's Recommendation:

### Proposed Amendment No. 17:

Amend Section 1.3.5 Other Relevant Plans & Policy; South Dublin County Council (page 9).

Delete the second paragraph:

~~In December 2018, South Dublin County Council commenced the formal process to amend the zoning objective of approximately 178 hectares of land from zoning objective EE (Enterprise and Employment) to objective REGEN (Regeneration) under the "Proposed Variation No. 3 – Zoning Amendment to Lands at Ballymount / Naas Road", see Fig. 9. These lands are located in the Ballymount/ Naas Road area, which are south of the Grand Canal and east of the M50, adjoining the boundary with Dublin City Council. The proposed variation seeks a plan led approach, including provision for a new Local Area Plan, to provide a framework for the sequential and phased development of these lands. The closing date for public submissions on this (amended) variation was 29<sup>th</sup> March 2019.~~

Replace with:

While the lands to the immediate south of the LAP and abutting the M50 are zoned for enterprise and employment, it is of significance to note that South Dublin County Council recently rezoned 178 hectares of land in the Ballymount / Naas Road area from enterprise and employment to "REGEN" (regeneration), which came into effect on the 7<sup>th</sup> May 2019. This variation to the South Dublin County Development Plan 2016-2022 contains a Specific Policy Objective, CS6 SLO 1, to initiate a plan led approach to the sustainable regeneration of the brownfields lands in the Naas Road/ Ballymount REGEN zoned lands, with a view preparing a LAP or other appropriate mechanism for regeneration. Dublin City Council and South Dublin County Council are currently working together carrying out detailed analysis of these REGEN lands and the City's "Z6" lands north and south of the Canal.

Delete **Fig. 9: Extract from South Dublin County Council Proposed Variation No. 3.**

**Amend Fig 10:** Dublin City Development Plan 2016-2022 merged with South Dublin County Council Development Plan 2016-2022; to show the newly adopted "REGEN" zoned lands.

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

### 3.2.1 Chapter 1: Policy and Plans

Submission No.: 123

#### Summary of Submission:

A request was made for the “Making Cherry Orchard Better, Action Area Plan 2107, as set out in Section 1.3.4 to be supported on a statutory basis, and that it would receive backing and resources to deliver the objectives of the Plan as agreed with the community.

#### Chief Executive’s Response:

The *Making Cherry Orchard Better, Action Area Plan 2017* is referenced several times in the LAP, with the Vision and *Indicative Village Centre Framework* set out in Section 1.3.4 of the LAP. While it is not within the power of the LAP to provide a statutory footing for any other Plan, the LAP does fully support the implementation of the Plan, and it is viewed as an essential component in achieving social and economic regeneration within the area. In order to address the concerns of the submission it is recommended that additional text be added to Section 1.3.4 to clarify the support of the LAP for this Plan, and to highlight in greater detail where the two plans overlap.

Elsewhere within the LAP, Section 4.3.4 fully supports the proposed Community and Social Enterprise Hub, identified within the *Making Cherry Orchard Better Plan*, and sets out four possible locations that could be used to accommodate this centre, allowing the most suitable site to be chosen, subject to more detailed input on resources to be provided/ scale of centre.

#### Chief Executive’s Recommendation:

##### Proposed Amendment No. 18:

Amend the last paragraph of Section 1.3.4 “Making Cherry Orchard Better” Action Area Plan 2017 (page 9), and insert new text as follows:

The plan sets out a series of key principles and actions and provides a framework for community renewal. **Under the heading of the Built Environment, the plan sets out six key objectives, notably:**

**BE1: Review, as part of the preparation of any statutory local area plan, land use zoning, residential capacity and schools requirements of the Cherry Orchard and Park West area.**

**BE2: Ensure an appropriate balance of affordable, social and market housing in the area and provide smaller units to be managed with the existing local authority housing stock.**

**BE3: Liaise with Dublin Bus and Iarnród Éireann in relation to the enhancement of public transport services to the area.**

**BE4: Seek community involvement in the design of public parks, any community enterprise centre and traffic calming measures.**

**BE5: Implement a tree planting programme (e.g. cherry trees) on streets, roads and public parks.**

**BE6: Seek to develop, at an early stage, a supermarket and local shops at the village retail centre.**

~~4~~**The Plan** also includes proposals for the creation of a new village centre on the vacant site to the west of Barnville estate and the potential for a community and social enterprise hub to the south of St. Ultan's school. The area action was presented and approved by the South Central Area Committee in September 2017, **and the LAP seeks to further the implementation of the above objectives, through the development objectives set out in Chapter 4.**

### **3.2.2 Chapter 3: Vision**

Submission No. 105

#### **Submission Summary:**

The submission from Cllr Sophie Nicoullaud states the LAP lacks Vision to give the place the necessary uplift needed. A vision that focuses on traditional agriculture and promotes the tradition of horse ownership, along with compact sustainable urban living is proposed.

#### **Chief Executive Response:**

The vision as set out in Chapter 3 has regard to and seeks to capture the key points of the Dublin City Development Plan 2016-2022 guiding principles under Strategic Development and Regeneration Area No 4, in addition to the vision statement set out within the *Making Cherry Orchard Better Action Area Plan 2017*, and the submissions received during the public consultation Issues Paper stage for the Park West – Cherry Orchard LAP. It is as follows:

##### *3.1 Vision:*

*Park West – Cherry Orchard will be an attractive and identifiable place with a vibrant and active community. A good mix of residential typologies will cater for people across all spectrums of their lifecycle, and residents will have the benefit from the provision of local shops, schools, parks and community and recreational facilities New commercial and enterprise space will provide opportunities for local employment and both residents and workers will benefit from a high quality integrated public transport network system, and a permeable and safe environment.*

The vision seeks to capture higher level policies as set out above into the land use strategy of the LAP.

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

Submission noted, no changes proposed.

### **3.2.3 Chapter 4: Section 4.2: Urban Framework and Land Use Strategy**

Submissions: 101, 105, 109, 114.

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

One submission requested that Site 4 remain an open green space as a buffer to these pollutants.

The submissions from Greenseed Ltd (owners of sites 6, 7, & 8) expressed acceptance of the Draft LAPs proposed uses and mix (with some requests for residential densities to be reviewed, dealt with below under section 3.2.7). The submission from the Land Development Agency queried the introduction of ratios in the sites briefs for sites 4 and 5 in particular, requesting that they be omitted.

The submissions from the Dublin Chamber suggested the LAP should include brownfield regeneration proposals for Park West Industrial Park to further utilise new physical infrastructure proposals and to improve connections/ permeability for the area.

#### **Chief Executive's response:**

Section 4.2 Urban Framework & Land Use Strategy within the Draft LAP sets out the strategic land use proposals for the LAP lands which seeks to achieve an efficient and effective land use, linking transport and land use while also taking into account environmental considerations which played a key role, particularly in relation to noise levels and air quality in close proximity to the M50 and the railway.

In this regard noise and air pollution was carefully considered as part of the overall development strategy for the Park West Cherry Orchard area, in particular the Land Use Strategy for the LAP, which seeks non-residential uses along the M50 boundary. Since the publication of the Draft LAP, the EPA published a new *Urban Environmental Indicators* report (EPA 2019), which reaffirms this approach noting NO<sub>2</sub> concentrations are known to exceed EU limits along the M50, with the highest concentrations within 10m of the motorway edge, and with levels falling to background concentrations around a distance of 50 to 75 metres. These findings support the LAP land use strategy to set back residential use from the boundary with the M50, where non-residential uses and a green belt is proposed.

Noise/Air pollution mitigation requirements have been identified for development sites adjacent to the M50 and adjoining the railway which will be required to be addressed as part of the final design / layout proposals for these development sites. This requirement is further supported by section 4.6.7 Building Design and Quality and objective UD14 where it is an objective of Dublin City Council "To seek the submission of detailed assessment mitigation strategy for noise and/or air **quality**, for all development proposals adjoin the M50 or railway line, as part of future planning applications." (New text inserted as per proposed amendment No. 8 above).

Site 4 is identified as a key development site within the LAP area and development proposals include for the delivery of significant housing development along with some employment and enterprise use along the M50 to provide additional set back and buffer to the M50 for the proposed residential development. This is considered to most appropriate land use for the site and in is considered site 4 will play an important role in delivering a broad range of housing typologies across the LAP lands which in turn acts to help address the shortfall of housing supply both in the immediate area and the wider Dublin area.

Section 4.6.5 Future Development and Density within the Draft LAP sets out a graded approach to density, with different density ranges across each of the sites, taking into account the existing built context and proximity to public transport (in particular the Park West train station). This approach to density ensures the delivery of between 2200 – 3000 new residential units and is in accordance with the Dublin City County Development Plan 2018-2022 Core Strategy and reflects the importance of the SDRA designation while also fully cognisant of current national planning policy and current legislation.

Dublin City Council is working in partnership with South Dublin County Council following the allocation of funding under the URDF scheme which is examining opportunities and constraints within DCC's "Z6" lands at Park West Industrial Park located to the east of the Park West - Cherry Orchard LAP. These lands and wider industrial zoned lands, in conjunction with SDCC newly zoned "regen" lands are currently under review. As part of current LAP process we have examined issues of further enhanced connectivity, school provisions etc. to serve this wider area, outside of the LAP lands, should development come forward on these lands at some stage in the future

**Chief Executive's Recommendation:**

Proposed Amendment No.19:

Update amend section 4.4.5 Housing Sites Table (Page 41) and text.

Amend 4.4.5 Housing Sites

The LAP contains eight key sites available for development which have the potential to deliver in the order of between ~~2000-2700~~ **2200-3000** new residential units.

Insert /Amend text within table as per below, located at end of Section 4.4.5

Site	Use	Estimated Unit Numbers
Site 1	100% Residential (with opportunity for crèche facility)	<b>c. 130 - 230</b> new units (in addition to the 72 no. units on-site/ under construction)
Site 2	Residential, incl. senior citizens accommodation and some local retail (3-4 shops)	<b>c. 130 - 230</b> new units (in addition to the 77 no. units near completion)
Site 3a	3A Enterprise/Employment use	N/A
Site 3b	100% residential	c. 40 – 60 units
Site 4	Predominately residential, some mixed-use: Residential: 70-80% Enterprise/ Commercial: 20-30%	c. 600 – 700 units
Site 5	Predominantly residential, some mixed use: Residential: c 80% Enterprise/ Commercial: max 20%	<b>c. 150 – 200 units</b>
Site 6	Predominantly residential Residential: c. 80% Enterprise/ Commercial: max. 20%	<b>c. 550 – 650 units</b>
Site 7	Mixed use – Residential and Commercial c. 50/50 split	c. 400 – 500 units
Site 8	Mixed use – Residential and Commercial c. 50/50 split	c. 250 – 350 units
		<b>Total new units c 2250 - 2920</b>

All references throughout the LAP that reference estimated unit numbers shall be in accordance with the above text and table.

### **3.2.4 Chapter 4: Section: 4.3 Economic Development and Employment**

Submissions: 47, 48, 49, 57, 58, 102, 108, 109, 110, 111, 112, 114, 125

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

Submissions on Economic Development and Employment related to Retail /Office space, Employment and provision of a Community Social Enterprise Hub:

##### **Retail/Office Space:**

There were a number of submissions highlighting the need for large scale convenience store / supermarket to serve the area and there was significant support for the delivery of a new supermarket at the proposed location as set out within the LAP Chapter 5 Site Briefs (Site 4). There was also a submission which suggested site 5 should also be considered as potential site for the supermarket.

A number of submissions were also received in relation to the Draft LAP proposal for the provision of local retail along with senior citizens as part of development of Site 2. While one submission was received opposed to the provision of local retail at this location the majority were in favour as it was felt there was a lack of local retail facilities within the area. However, a number of the submissions did express concern with regards to the provision of senior citizen housing in close proximity to the proposed local retail and Public Square, particularly as it was felt there was significant potential for anti-social activity if not properly designed.

A submission was received from Greenseed Ltd (Landowners) welcoming the addition of retail along Park West Avenue which they believe they can facilitate through the development of Site 6. However they also consider that the positioning of additional retail/ commercial floor space south of the existing Aspect Hotel would also serve to animate this area of the streetscape and provide a link to the established retail/ commercial uses within Park West Plaza. The submission requests that Fig 37 is amended to extend the retail zone south of the Aspect Hotel as far as the Park West Avenue/ Park West Road roundabout.

A number of submissions were received that expressed concern over the LAP proposals for additional commercial / office space within the area given that there are currently vacancy units within the Park West area – noting also the recent change of use permissions granted at two locations along the Park West Avenue.

##### **Employment:**

There were a number of submissions received seeking that the LAP makes adequate provision of much needed social services such as family support an access to employment services along with a programme of education & training to improve the skills of local unemployed and underemployed so they can avail of employment opportunities locally.



A submission was received from Aengus Ó Snodaigh TD and Councillor Daithí Doolan requesting that the LAP includes a commitment to include a Social Clause in any contracts given. Also that an audit of locally available skills be carried out to ensure that skilled workers self-employed, underemployed and unemployed people are offered opportunities in contracts associated with the construction of the new developments, servicing and working in the new complexes, offices and shops.

#### Community Social Enterprise Hub:

A number of submissions were received in support of the LAP proposals for the delivery of new Community and Social Enterprise Hub (as previously identified within the 'Making Cherry Orchard a Better Place Plan')

The submission received from Councillor Daithí Doolan suggest that the LAP should identify land for the development of and type of social enterprises which could avail of that land and the services required to sustain them. The LAP should seek to develop local incubation space for local enterprises and small local start-ups. The submission supports the draft LAP's identification of the narrow strip between the M50 and Cloverhill Road next to St Oliver's, as being possibly suitable for this local enterprise use.

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

Section 4.2 of the Draft LAP Urban Framework & Land Use Strategy within the Draft LAP sets out the strategic land use proposals for the LAP lands.

Section 4.3.2 Retail Provision - deals specifically with retail provision and identifies two new locations for additional local retail in addition to supporting the existing Park West Plaza. The proposals for new local retail at Cherry Orchard Avenue and in the vicinity of the Park West railway station takes into account the potential for both the existing and new population to support and sustain the provision of additional retail at these locations. Dublin City Council would have concerns over the provision of further additional retail above what is already proposed within the LAP and as such would not be supportive of extending the retail use along the full length of Park West Avenue beyond the Aspect hotel to meet with the Park West Plaza.

The Draft LAP acknowledges the specific need for the provision of a Supermarket to serve both the Cherry Orchard and Park West area and in this regard the Draft LAP has identified a site immediately to the north of the train station within Site 4 as the most suitable location for such a use. This location provide opportunities to optimise the level differences that exist at this location and also provide opportunity to deliver a non-noise sensitive use at this location.

The Draft LAP proposes a small number of local retail units as part of the development of Site 2 along Cherry Orchard Avenue. The LAP seeks to provide for a local hub by consolidating the uses around the existing local community facilities (St Ultan's N.S, Cherry Orchard Health Centre and the local Church). The Draft LAP also considers that this location would be suitable for the provision of Senior Citizens Housing given its close proximity to the local retail proposals and the existing community facilities. While there are specific design challenges associated with such developments it is considered that through good urban design practice the proposed development of local retail and senior citizens housing could be successfully delivered on Site 2 and would help create a new local neighbourhood feel to this section of the Cherry Orchard Avenue which would also be a valuable amenity to the surround existing residents. Section 4.2.3 relating to Cherry

Orchard Avenue and Chapter 5 'Site Briefs' (Site 2) - both highlight the specific design challenges around delivery of local retail / senior citizen housing and the new public square and the importance of good urban design practice as part of the overall development of Site 2.

The strategic land use proposals for the LAP lands which seeks to achieve an efficient and effective land use, linking transport and land use also took into account environmental considerations which played a key role, particularly in relation to noise levels and air quality in close proximity to the M50 and the railway. The Draft LAP proposals regarding the location of commercial / office space is part of a wider land use strategy which considers as a broad range of issues (including proximity to M50 / Rail as well as potential noise and air quality factors).

Section 4.3.4 Community and Social Enterprise Hub - within the Draft LAP fully supports the delivery of proposed Community and Social Enterprise Hub, as identified within the *Making Cherry Orchard Better Plan*. The Draft LAP identifies four possible locations that could be used to accommodate this centre, allowing the most suitable site to be chosen, subject to more detailed input on resources to be provided/ scale of centre. In this regards it is an objective of Dublin City Council as set out within Economic Development Objective ED07 "To Support the development of a new community and enterprise hub within the LAP lands to the north of the railway station". A submission was received which supports the draft LAP's identification of the narrow strip between the M50 and Cloverhill Road next to St Oliver's, as being possibly suitable for this local enterprise use.

Section 4.3.5 Local Employment & Training Opportunities within the Draft LAP recognises the opportunity to maximise employment and training opportunities for the residents of Cherry Orchard and Park West throughout the construction and development of the LAP lands. In this regards it is an objective of Dublin City Council as set out within Economic Development Objective ED09 "To liaise and work with agencies and organisations working in the Park West and Cherry Orchard area to maximise education opportunities and support access to employment for local residents of Park West – Cherry Orchard and surrounding area" and ED10 "To require social labour clauses on any City Council projects, and to encourage them in other projects".

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

For reasons outlined above, the Chief Executive would have concerns regarding the request for further additional retail above what is already proposed within the LAP and as such would not be supportive of extending the retail use along the full length of Park West Avenue beyond the Aspect hotel to meet with the Park West Plaza.

#### Proposed Amendment No.20:

Propose addition of new text to section 4.3 Economic Development and Employment and/or addition of New Economic Objective to reflect same –

**ED11: To support the implementation of the employment and training objectives (ET1-ET6) of the *Making Cherry Orchard Better Action Area Plan (2017)*.**

Social Clauses: Noted and Agreed see Economic Development Objective ED10 below:

ED10 "To require social labour clauses on any City Council projects, and to encourage them in other projects".

Community / Social Enterprise Hub: Noted and Agreed see Economic Development Objective ED07below:

ED07:"To Support the development of a new community and social enterprise hub within the LAP lands to the north of the train line"

### 3.2.5 Chapter 4: Section 4.4 Housing and Tenure

Submissions: 49, 57, 112, 114, 124, 125.

#### Summary of Submissions:

Divergent opinions were expressed in submissions in relation to the issue of housing and tenure. While some called for the provision of more private housing, others were concerned that housing would not be available to local people. The submissions from Aengus Ó Snodaigh TD and Councillor Daithí Doolan called for a specific tenure mix of 30% council housing, 30% affordable to buy, 30% cost rental and 10% private housing throughout the LAP area; while the submission from Brid Smith TD and Cllr Hazel De Nortúin called for the sole use of public land for public housing; in the form of affordable, social and cost rental. Concern was also expressed by some over the provision of apartments versus houses, and a fear that this would not encourage people to buy their own homes.

There was support for the provision of a mix of 1, 2 and 3 bed homes to cater for all the needs of the existing community, including senior citizen complexes and independent living units, with housing for the elderly located adjacent to retail units and services. One submission drew attention to the need for a significant number of 1-bed units given the dearth of accommodation for single men and women in the Dublin10 and 12 area.

The submission from Greenseed Ltd (owners of sites 6, 7 8) draws attention to a minor discrepancy between the estimated range shown for Site 6 in section 4.4.5 of c. 500-700units (page 41) , against that shown in Chapter 5, of c. 550-650 units (page 70). This submission also seeks greater flexibility in relation to how the LAP is interpreted particularly in relation to emerging residential formats of Build to Rent developments and Shared Accommodation. The estimated numbers shown the LAP need to be clearly labeled as indicative, and allow for new housing models that comply with the *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities 2018*.

#### Chief Executive's Response:

Chapter Two of the Draft LAP sets out the tenure mix in Park West – Cherry Orchard, which currently has a high proportion (46.2%) of DCC/ social renting housing, a low percentage of private rental (6% when omit public subsidy), and relatively low owner occupation (26.5%). This has created a relatively narrow housing market, reducing opportunities for local people to purchase or rent in the area. The correlation with economic status and disposable income also has an impact on the ability to sustain commercial shops and services, essential to meet the local demands of everyone. What the Draft LAP tries to achieve is a greater balance and spread of different tenures and typologies to increase the housing offerings available. It specifically states that provision should be made for:

- New social housing as per Part V of the Planning and Development Act 2000
- Affordable / co-operative housing.
- Senior citizen housing (both private and social)
- Special needs housing
- Private housing, both for rent and for owner-occupancy
- Cost – rental housing

The above is in turn reflected in Housing Objectives H01, 02, H03, H04, H05, H06 and H07.

Also of particular note is the *Making Cherry Orchard Better Plan*, which specifically calls for the provision of private market housing to help achieve an improved balance of tenure and income locally (Objective BE2 of *Making Cherry Orchard Better*). This plan underwent considerable local consultation and was adopted by the members of the City Council in 2017. Its implementation remains a priority for the City Council.

With 31.7 ha of the vacant lands under the ownership and control of Dublin City Council, there is considerable scope for the City Council to help meet the objectives of the City's Housing Strategy, i.e. good tenure mix and mix of housing typologies. This has for example allowed DCC to successfully apply for funding under the Serviced Sites Initiative, to specifically deliver affordable housing on Site no. 1 (also to include 10% social housing). Retaining the flexibility to achieve varying housing objectives on a site-by-site basis on Council owned land allows a far more practical application of housing policy, rather than requiring a specific breakdown on each individual site.

The draft Plan also makes provision for lower density housing on sites 1, 2, 3b and the upper half of site 4, to specifically target the provision of starter homes (both houses and apartments), to allow opportunities for people to buy in the area.

In relation to the issue of private housing typologies raised by Greenseed, it is considered that the LAP sufficiently allows for a mix of housing options; private housing both for rent and owner-occupancy is allowable under the LAP; and as such all forms of private rental are open for consideration providing the proposed scheme meets other LAP and DCC objectives for achieving a good mix and balance of housing units across the scheme, providing high quality design and integrating well with the surrounding landscape/community. The discrepancy between the estimated numbers on pages 41 and 70 will be amended as set out below. In addition, a footnote will be added to provide further clarity on the breakdown of the estimated unit numbers.

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

See updated table in Section 4.4.5 above in amendment No.19.

#### Proposed Amendment No 21:

Insert the following text at the end of the first paragraph under Section 4.4.5 (see also Amendment No. 19 above):

The LAP contains eight key sites available for development which have the potential to deliver in the order of between **2200-3000** new residential units. **The estimated unit numbers shown are based largely on the provision of 1 and 2-bed units with provision for some 3-beds. Other housing typologies including for example shared accommodation and built-to-rent schemes may yield an uplift on estimated numbers, and will be assessment on their merits.** Further details on each of these sites in set out in Chapter 5.

### **3.2.6 Chapter 4: Section 4.5 Access and Movement (Traffic and Transport)**

Submissions: 1, 48, 57, 58, 90, 105, 109, 110, 111, Sub 112, 124, 125.

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

Submissions on Access and Movement related to existing traffic congestion, existing and planned public transport provision, Irish Rail, DART, Bus, LUAS, road connections, pedestrian and cycle facilities park and ride facility at rain station and residential car parking provision.

#### Traffic congestion:

There were a number of submissions citing significant traffic congestion in the area as an issue particularly around the AM and PM peaks times. Concerns were raised that the additional development proposed within the LAP would further compound the existing traffic congestion problem.

#### Public Transport:

There were a number of submissions stating that the existing Public Transport provision was inadequate to serve the area at present and as a result could not possibly serve the future planned development. The fact that currently there is no DART service for the area and the fact that existing commuter trains are overcrowded were cited as evidence of same. Submissions were also received stating that the existing service is unreliable. In addition to the above a number of submissions highlighted an issue regarding access to public transport infrastructure which currently is poor due to poor connectivity and permeability throughout the LAP area.

There were several submissions citing poor public transport connectivity to nearby destinations such as Clondalkin / Liffey Valley and also poor public transport integration between the bus service and the train station at Park West and also the LUAS at Kylemore or Red Cow. Submissions were received requesting that DCC would lobby the NTA and Iarnród Éireann to deliver improved rail service for the area. The opening of Platform 10 in Hueston Station) and proposals to extend the rail service, adding additional two tracks from Hueston to Adams town with frequent light rail were both identified as potential schemes which would improve levels of service for the area.

#### Cycling and Walking:

A number of submissions were received seeking improvements to cycling safety, and increasing the number of pedestrian-priority crossings, and reduce motor traffic speeds with traffic calming as part of creating streets more attractive for pedestrians and cyclists. Better quality cycling infrastructure is required to deliver safe pleasant routes to promote cycling in the area (segregated cycle facilities that are maintained along with secure cycle parking). One submission also suggested that Dublin Bikes Scheme could potentially be expanded to the LAP area utilising the existing Grand Canal Greenway link - utilising new physical infrastructure proposals to improve connections/permeability for the area. In addition to the delivery of improved cycle / pedestrian facilities the need for better maintenance was also highlighted within a number of submissions in order to promote walking and cycling - road sweeping, tree pruning etc.

#### Car Parking:

A number of submissions were received that identified the lack of car parking provision within the current development as being an issue, in particular two locations were identified as problematic and areas which should be addressed within the LAP (adjacent to primary school and within Cedar Brook residential area)

There was broad support for the provision of a park and ride beside the train station.

#### Electric Vehicles:

There was a request for the provision of charging points for electric vehicles throughout the scheme.

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

### Traffic congestion:

Section 4.5 Access and Movement within the Draft LAP proposed a number of new links providing both improved vehicular and improved pedestrian/ cycle permeability within LAP area and improving connections to the wider surrounding networks. The proposed new connections will help create a highly accessible network of streets which will encourage walking, cycling and provide much improved access to public transport infrastructure. For example: Site 1 will deliver a new north south street connecting Ballyfermot Road and Cherry Orchard Green within the heart of LAP area. The LAP will support developments which promotes modal shift to more sustainable modes of public transport including cycling and walking, reducing car dependency within the LAP helping to reduce existing traffic congestion.

### Public Transport:

Section 4.5 Public Transport within the Draft LAP looks at Rail (DART), Luas and Bus infrastructure within the LAP area. Consultation between the LAP team and the NTA during the pre-Draft stage led to the inclusion of a number of specific public transport objectives within the Movement Objectives of the Plan, specifically MO5, MO7, MO8 and MO15 along with a number of the Urban Design objectives of the UD8 and UD10. As such the Plan is considered to be consistent with the NTA Transport Strategy for the Greater Dublin Area 2016-2035 by both the NTA and DCC.

See also CE response and proposed amendments Nos 11 and 12 above (NTA submission) which provides further updates regarding current investment priorities for transport infrastructure to serve the LAP lands.

### Cycling and Walking:

Section 4.5.4 Cycling and 4.5.5 Walking within the Draft LAP seeks to promote both cycling and walking through the creation of safe attractive identifiable legible places with easy to navigate pedestrian and cycle links. In this regard the Draft LAP contains a number of specific movement objectives such as MO9 which seek to support the implementation of the NTA Cycle Network Plan within the LAP lands and MO13 which seeks to ensure all development proposals comply with the requirements of Design Manual for Urban Roads and Streets (DMURS) prioritising the needs of pedestrians, cyclists and public transport.

See also CE response to the NTA submission above.

### Car Parking:

The broad support for received for the Park and Ride facility proposed for site 4 within the Draft LAP is welcomed. See also proposed amendments (NTA submission) which amends MO14 to ensure that the Park and Ride facility proposed is of a scale and nature to cater for the local needs of both existing and future residents. Across each of the Key Strategic Development sites car parking provisions will be required to be provided as

appropriate for all new development proposals. Where appropriate the LAP will also seek to implement traffic improvements at specific locations such as along Cherry Orchard Avenue in the vicinity of and adjacent to primary school. Chapter 5 “Site Briefs” within the Draft LAP sets out specific development objectives for each of the key development sites within the Park West – Cherry Orchard LAP area. In this regard, the development objectives for site 2 seek to “enhance and upgrade existing streetscape along Cherry Orchard Avenue in the vicinity of new local neighbourhood centre, to include new pedestrian crossings”. It is considered that additional text can be included to address the request for school drop-off points along this road, see below.

In response to the request for electric charging points to be provided in new developments, it is considered that additional text and a new movement objective can be included to address this.

See also CE response (NTA submission)

### **Chief Executive’s Recommendation:**

Public Transport: See proposed amendment No.11 and No.12 (NTA submission) which provides further updates regarding current investment priorities for transport infrastructure to serve the LAP lands.

Cycling and Walking: See proposed amendment No.9 (NTA submission) amends MO13 to ensure all Cycling infrastructure is designed in accordance with the NTA National Cycle Plan.

Car Parking: See proposed amendment No.10 (NTA submission) amends MO14 to ensure that the Park and Ride facility proposed is of a scale and nature to cater for the local needs of both existing and future residents.

#### Proposed Amendment No.22

Amend, insert text into Chapter 5 “Site Briefs” Site 2 North of Cherry Orchard Avenue (Local Neighbourhood Site) (Page 65)

“enhance and upgrade existing streetscape along Cherry Orchard Avenue in the vicinity of new local neighbourhood centre **and existing primary schools**, to include **additional on street parking / layby areas** and new pedestrian crossings”

#### Proposed Amendment No.23:

Insert new sentence into Section 4.5.1 Access and Movement Strategy Introduction, at the end of the second paragraph (42), as follows:

**In keeping with the objectives of the City Development Plan (Objective MT025 of the 2016-2022 DCDP), the LAP will seek the provision of electric vehicular charging points across each of the key development sites at appropriate locations.**

Inset new movement objective (page 46), as follows:

**MO16: To seek the provision of electric vehicular charging points across each of the key development sites at appropriate locations**





### 3.2.7 Chapter 4: Section 4.6: Urban Form and Design

Submissions Nos: 1, 58, 90, 101, 102, 107, 109, 110, 111, 114, 125, 126.

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

Submissions on Urban Form and Design related primarily to densities and building heights, while a small number also highlighted the need for active street frontage along key streets and public areas.

Submission received in relation to densities and building heights varied between submission requesting increased densities and submissions requesting reduced densities and heights. A number of submissions highlighted that the LAP presents an opportunity to develop a high-density walkable suburb to Dublin, centred on public transport and the hence densities should be increased to reflect this. There were a number of submission requesting that densities should be increased beyond those currently set out within the Draft LAP in order to maximise development potential of the LAP lands given the existing/proposed public transport infrastructure in close proximity of the plan lands. A submission was also received referencing the DCC DP and Core Strategy seeking additional density to better align with same.

There were also a number of submissions, mainly from existing residents, expressing concern over the densities and in particular the heights proposed within the Draft LAP. The main issue within these submissions were around the proposed heights planned for housing development within the Draft LAP (8-10 storeys), which would not be in keeping with the other buildings in the area. There is concern that the large scale blocks of flats proposed are not conducive to cohesive community living. The area needs a combination of duplex housing and varied height apartments to enhance this area, making it more appealing to potential buyers and hence diversifying the social mix within the area. Cherry Orchard already has significant anti-social problems and there is a lack of policing - further development as proposed by the LAP will only create additional ant social problems for the area.

A submission was also received from Greenseed Limited (landowners) requesting that the LAP height strategy is further considered in light of policies relating to building height in the NPF and the recently published 'Urban Development and Building Height Guidelines for Planning Authorities'. More specifically the submission Request that SPPR1 and SPPR3 of the Height Guidelines be specifically acknowledged in the final LAP. There is also a request that the LAP is further clarified to state that building heights as identified in the text and tables of the LAP are indicative only and not maximums and also acknowledges the criteria-based approach within SPPR3 and that increased building height may be grated where development complies with the relevant criteria.

A number of submissions were received requesting that the Chapter 5 Site Briefs which contain layouts and massing diagrams should be clearly labelled as indicative (or preferably omitted). To provide for additional flexibility the ratio of commercial to residential should be omitted and the LAP should be less prescriptive in relation to both the supermarket and park and ride facilities to allow for either site 4 or site 5 to provide such facilities subject to further detailed design analysis.

There were also a couple of submissions seeking that the LAP should further promote more active street frontage in and around the train station, plaza area and proposed local

neighborhood centre to help animate and bring life to the area while also providing much needed passive surveillance.

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

Section 4.6.5 Future Development Density and 4.6.6 Building Heights within the Draft LAP set out the density strategy and the building heights strategy for the LAP lands. The LAP sets out a graded approach to density considering both the built context and proximity to public transport infrastructure such as the train station and bus routes. It is considered that the LAP allows for sufficient flexibility in broadly identifying three density ranges; (Low Density of up to 50units/HA) appropriate for areas located further from the train station and/or areas adjoining existing low density residential developments; (Medium Density of 50 -100 units/HA) for areas within easy walkable distance from the Train Station; (Higher Density in excess of 100 units/HA) for areas located within the immediate vicinity of the Train Station.

Chapter5 - "Site Briefs" provides further guidance in the form of specific development objectives for each of the key strategic development sites along with **indicative layouts** for each site to give graphical representation of how each of the sites could be developed in accordance with the development criteria set out in the associated table i.e. Densities / Heights/ Estimated Capacities/ Land Use etc. The indicative layouts shown have typically targeted the mid-range of the criteria set out within the respective tables. It is considered that the overall quantum's of new residential development and residential densities proposed within the Draft LAP (circa 2200 – 3000 units) is aligned with the Dublin City County Development Plan and the Core Strategy which has identifies the Cherry Orchard – Park West area as one of its Strategic Development and Regeneration areas capable of delivering in the region of 2000 residential units.

Section 4.6.7 Building Design and Quality within the Draft LAP sets out a number of key urban design objectives that deal specifically with the importance of active ground floor usage, active frontage and the need for high quality public realm at key locations along strategic link streets and areas of public space. These objectives are further supported within the Urban Design & Form Objectives, UD01 – UD15.

Section 4.2 Urban Framework & Land Use Strategy within the Draft LAP sets out the strategic land use proposals for the LAP lands which seeks to achieve an efficient and effective land use, linking transport and land use while also taking into account environmental considerations which played a key role, particularly in relation to noise levels and air quality in close proximity to the M50 and the railway.

The Draft LAP acknowledges the specific need for the provision of a Supermarket to serve both the Cherry Orchard and Park West area and in this regard the Draft LAP has identified a site immediately to the north of the train station within Site 4 as the most suitable location for such a use. This location provide opportunities to optimise the level differences that exist at this location and also provide opportunity to deliver a non-noise sensitive use at this location.

See also CE response and proposed amendments relating to sections 3.2.4 (Economic Development & Employment) and sections 3.2.3 (Urban Framework & Land Use Strategy)

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

##### Proposed Amendment No. 24:

Insert new text 4.6.5 last paragraph (page50)

**The proposed density strategy set out above and the development strategies set out for each of the key development sites in Chapter 5 'Site Brief' has been determined in accordance with the recently published 'Urban Development and Building Height Guidelines for Planning Authorities' as required under SPPR1. In**

addition to the above, all future development proposal will be required to be submitted for planning approval and a strategy of applying performance criteria will also be applied when assessing building heights at appropriate locations as opposed to numerical limitations, in accordance with the recently published 'Urban Development and Building Height Guidelines for Planning Authorities' as required under SPPR3.

Proposed Amendment No. 25:

Insert new text 5.1 last paragraph (page 63)

The overall aspirations for each of the key development sites are set out as development objectives in the following section, 5.2 'Site Briefs'. The development objectives and associated table includes land ownerships, proposed land use, indicative layouts, appropriate densities, appropriate heights and supporting infrastructure requirements. The estimated capacities shown relates to the indicative layout shown (typically achieving the median range) and is subject to further detail design and development mix analysis at design and planning stage.

Proposed Amendment No. 26:

Insert new text 5.2 Site 4, Bullet Point 4 (page 68)

High density residential development is sought in proximity to the train station, scaling down in height and density towards the northern half of the site. Lower-density residential development will be considered to the northern half to "kick start" development. **Building heights along Park West Avenue, opposite Cedarbrook shall range up to four stories to the northern end and up to six stories to the southern end.**

### 3.2.8 Chapter 4: Section 4.7 Community, Education, Recreation and childcare Facilities

Submissions: 49, 57, 58, 102, 105, 107, 108, 112, 121, 122, 123, 124, 125.

#### Summary of Submissions

There were requests to see the area provide for much needed community services including leisure and exercise opportunities, but also employment, training opportunities and shopping facilities.

#### Phasing

A number of submissions raised the issue of frontloading social and community infrastructure before placing additional demands on services through the provision of new housing; prioritising community facilities, education, childcare, policing, employment and training, all of which were identified by the communities as key issues in the *Making Cherry Orchard Better Action Area Plan*.

#### Policing

Concerns were raised over anti-social activity in the area and the need for adequate policing and cctv, along with requests to locate a new Garda station in the area. Requests were also made to target loose horses and scramblers in the area.

#### Cherry Orchard Park (4.7.1)

There was general support for the proposed improvements in Cherry Orchard Park, with outdoor all weather pitches and improved changing facilities. A submission from the

Cherry Orchard running club detailed their continued growth and expansion since setting up in 2012. Their focus on keeping fitness fun for the younger children draws up to c. 50 children on Tuesday and Thursday evenings, while the beginners club has over 50 members and the senior club over 100 people. The club has liaised with both the Orchard Celtic FC and De La Salle GAA club, who wish to work together with DCC in growing their clubs, with the help of the provision of new all-weather shared sporting facilities and changing facilities.

#### Children's Playgrounds (4.7.2)

A number of submissions stated that the area had a lack of play facilities and had concerns over the security of those already in place. Intimidation and anti-social behaviour are preventing optimal use of local greens and playgrounds. The plan should include for a series of pocket parks for children and toddlers dotted around the entire LAP area, with improvements made to existing open spaces that are not working.

#### Water Based Sports (4.7.3)

There was a request that a feasibility study be carried out immediately regarding the provision of a water based sports facility on the canal, and whether the reservoir site could be used to additional kayaking facilities, such as a slalom run, or for a canal barge docking area etc.

#### *The Arts:*

A submission was also received suggesting the LAP should do more to promote the Arts through the provision of live work artist studios and/or promote Community Drama initiatives for the area.

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

The LAP recognises the importance of community and social infrastructure in the creation of sustainable communities, and supports the on-going implementation of the *Making Cherry Orchard Better Plan*, which is a parallel plan seeking social and economic regeneration in the area. The identification of the key amenity sites and the provision for non-residential uses within the key sites, is a specific requirement to address the need for supporting infrastructure within the existing community and the new emerging sites.

#### Phasing

The issues of phasing is addressed in Chapter 6, but is also of particular importance here. The site briefs set out in chapter 5 of the Draft LAP purposefully align the development of the sites with the delivery of certain key infrastructure, e.g. the development of Site 1 provides for an important new link road between Cherry Orchard and Ballyfermot Road; Site 2 provides for the delivery of local shops, a new civic/green space, senior citizen accommodation, in addition to a new green route and providing space for the expansion of the Cherry Orchard Community Childcare Centre; site 6 requires that land be made available for a new primary school in consultation with DES. In setting out the site briefs in this manner the Plan is ensuring that as sites are development, key social infrastructure is occurring in tandem.

The identification of the two key amenity sites, are seen as fundamental in delivering on the required community/ social/ sporting and recreational needs of the area. Securing funding and implementing the delivery of these sites is a core element of the LAP and will be progressed as such. In order to provide some greater certainty in relation to key amenity Site A Cherry Orchard Park, it is considered that additional wording can be added to the Plan, giving a commitment to commence consultation on the redesign of the park in 2020, following adoption of the LAP.

#### Policing

In preparing the site briefs for Site No. 4 consideration was given to the location of a new Garda station, in particular in proximity to the train station, and the mixed use provision for

this site still allows for this to occur. It is considered taking on board the proposals within the LAP and the future examination of the Z6 industrial lands for potential rezoning that a commitment shall be given to liaise further with An Garda Síochána to ascertain future requirements and to provide for such in the most advantageous location possible. It is proposed to insert new text into section 4.7 to reference this.

#### Cherry Orchard Park (4.7.1)

The chief Executive welcomes the support for the upgrading of Cherry Orchard Park. As noted above it is proposed to commence consultation with local stakeholders on the redesign of the park in 2020 following the adoption of the LAP. New text is proposed to strengthen this commitment in the Plan.

#### Children's Playgrounds (4.7.2)

The provision of play facilities will be an important and key element in the redesign of Cherry Orchard Park, with the aim to provide a playground that is safe, well lit, supervised and most importantly well used. Objective CS3 specifically seeks to carry out a play assessment and strategy for the area, examining existing local pocket parks and identifying areas for improvement. As per section 4.9.2 each of the key sites for development will be required to positively contribute to the green infrastructure for the area, and section 4.7.2 specifically states that new residential developments must provide opportunities for children's play. New parks and playgrounds in the key sites will form an important element in the landscape strategy for these sites.

#### Water Based Sports (4.7.3)

The old Gallanstown Water works site is identified as a key amenity site in the LAP, and will be progressed as a priority project.

#### *The Arts:*

The *Making Cherry Orchard Better* Plan, includes an action to actively develop and resource a community and schools art programme, with the establishment of a "arts week" once a year, holding an annual community / arts event, setting up an artist in residence for the community and running school/ after school arts events. It is proposed to provide a specific reference to this Action, as a new objective in the LAP.

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

#### Proposed Amendment No. 27, incorporating changes from proposed amendment No. 3 above: :

Inset text into Section 4.7.1 Cherry Orchard Park as follows (page 52):

3<sup>rd</sup> Paragraph: It is hence an objective of the LAP to carry out a complete redesign of the park, which will be subject to further detailed public consultation, **with the Department of Education and Skills**, the Diocesan Trust, the local school, clubs and sporting organisations. ~~, and to ensure that this work occurs in tandem with the provision of new housing provision in the area.~~ **It is proposed to begin this consultation and the design stage of this process in 2020, in order to prioritise this project in tandem with new proposals.**

#### Proposed Amendment No. 28:

Inset new community and social infrastructure objective CS10 in Section 4.7 Community, Education, Recreation and Childcare Facilities, (page 54).

**CS10: Support the development of a community and school arts programme as per Objective CC6 of the *Making Cherry Orchard Better Action Area Plan*.**

Proposed amendment No 29:

Insert new Section at end of Section 4.7 (page 54):

**3.7.9 Emergency Services**

The provision of Fire Stations and Garda Stations form key community services typically covering a number of local villages/ communities. Given the scale of the development proposed in Park West - Cherry Orchard, together with the proposals to examine the adjoining “Z6” industrial lands, consideration and provision for emergency services is critical. Within the LAP lands, it is considered that provision can be made within Site No. 4 to accommodate such a need if identified, and it is an objective of this Plan to liaise with the emergency services prior to the build out of this site.

Insert new objective:

**CS11: To liaise with Dublin Fire Brigade and An Garda Síochána to ascertain future requirements for the LAP and wider area.**

**3.2.9 Chapter 4: Section 4.7.4 Equine Recreation:**

Submissions: 102, 105, 112, 121, 124

**Summary of Submissions:**

A submission was made on behalf of local group Horse Power for land to build stables for local horse owners. The submission specifically identifies Site 3a as a suitable site, and includes a sketch drawing showing provision for 24 /28 stables, hay/feed rooms, office, canteen, toilets; in addition to sulky track, outdoor arena, paddocks and grazing field, covering the entire site. The submission also states that the group is currently working with Familibase to address issues of governance and management for this proposal. The group has also met with staff from Cloverhill prison who are also seeking proposals for the same site, with both sides stating a willingness to share use of the site.

The submissions from Cllr. Daithi Doolan and Cllr. Hazel De Nortuin support the plans for a horse owners’ facility/ stables as does the submission from Cllr Sophie Nicoulaud, with the latter submission raising some concerns over the use of Site 3a for this facility due to its proximity to the M50 and its exposure to noise and air pollution. Also that the lack of surveillance and adequate space may be an issue for this site. The submission does however support the continued tradition and culture of horse ownership and calls also for the provision of horse trails within the LAP lands.

**Chief Executive’s Response:**

The Draft LAP section 4.7.4 notes that Cherry Orchard has “*a tradition and culture of horse ownership*”. Objective CS5 states that *It is an objective of Dublin City Council to continue to support the development of the Cherry Orchard Equine Centre, and to consider proposals for community stabling on Site 3a, subject to further detailed analysis.* It is considered that section 4.7.4 of the Plan and Objective CS5 serves both the continued growth of the existing equine centre and allows for the possibility of new stabling on site 3a.

The submission from Cllr Sophie Nicoulaud is noted including concerns raised over noise and air pollution adjoining the M50, and for horse trails throughout the LAP area. The Draft Plan seeks to combine the aspirations from many divergent groups often with conflicting

thoughts and aspirations. Removing horses from the residential areas has the benefit of allowing local greens and parks to be more optimally used by all groups of society for active and passive recreation, and there is a real health and safety issue which needs to be considered to safeguard local play spaces for young children. It is not proposed to provide stabling or horse trails within the established residential area or any of the other key sites that are ear marked for development (the majority of which are predominantly residential).

A late (one day late) submission was received from the Cherry Orchard Equine Centre, which is not summarised above. The Chief Executive does however note its desire to expand the existing service both in terms of opening hours (to include Sundays) and also to expand the existing facility, with the aim of providing increased training opportunities.

**Chief Executive's Recommendation:**

Submissions noted, no changes proposed.

**3.2.10 Chapter 4: Section 4.75 Education and Section 4.76 Childcare**

Submissions: 102, 105, 108, 112, 124

**Summary of Submissions:**

Childcare

A number of submissions raised the issue of the need for adequate childcare places/spaces to address the additional demand from the proposed new residential developments.

Education

The proposal to provide for a new primary school in the area was broadly welcomed in the submissions, with requests also to accommodate an expansion to the existing St. Ultan's NS. Requests for patronage diversity including an educate-together and an Irish school were raised, as was provision for a new secondary school. The submission from Cllr Daithi Doolan specifically requested that consideration be given to using Site 5 as a school campus for both primary and secondary school, with links to the new pitches across the road in Cherry Orchard Park.

**Chief Executive's Response:**

Childcare:

The Draft LAP acknowledges the need for additional childcare facilities to cater for a growing population, and this is seen as *"an integral part of proposals for new residential developments, particularly the key development sites identified in the Plan"*. Provision is also made within Site No. 2 to specifically allow the expansion of an existing childcare provider. Objective CS8 allows the Council to seek the provision of additional childcare facilities as part of new developments, taking into account an updated community audit to assess existing provision capabilities. No changes are considered required to meet this objective.

Education:

The Planning Department has worked with the Department of Education and Skills in preparing the Draft LAP for Park West – Cherry Orchard, and the Plan clearly makes provision for a new primary school to be located on Site No. 6 to the south-east of the site, with the rationale for this location set out in Section 4.7.5 (page 53) of the Plan. Following



a further submission from the DES as part of the statutory consultation process on the Draft Plan, further amendments are now proposed to include a specific reference to consider additional educational need on the Z15 lands surrounding St. Ultan's NS, please see Proposed Amendment No 2 above.

With regards to the future need for post-primary schools, and having regard to the consultations with DES and their formal submission, it is considered that this can best be accommodated to the immediate east of the proposed new school site in Site No. 6, subject to rezoning and Masterplanning. DCC will continue to work with the DES in preparing plans for these areas. Detailed consideration was also given to the use of Site No. 5 for a school campus, following the submission from Cllr. Daithi Doolan. However, on balance given that there is no immediate need for such a facility identified by the DES, reserving this site for a school would effectively sterilise this site for potentially the life of the LAP, and remove the capacity to deliver much needed housing to the order of c. 150-200 units. The Council has secured URDF funding to examine the Z6 lands at Park West Industrial Estate and further east into Inchicore, and this work is due to commence in the latter half of 2019, in conjunction with South Dublin County Council (in examining their REGEN lands south of the Canal). The provision of a secondary school that will cater for this area will be considered as part of this process, in consultation with the Department of Education and Skills.

Issues of patronage are outside the remit of the LAP and specifically addressed by the Department of Education and Skills.

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

Submissions noted, please see proposed amendment No. 2 above, and outlined below:

#### **Proposed Amendment No. 2:**

Amend, insert new text into Section 4.7.5 Education (page 53)

Insert new text at end of this section: **In addition, the LAP supports the expansion of the existing St. Ultan's NS and/or the provision of an additional primary school, within the Z15 lands surround the existing school. Currently underutilised these lands present a poor interface with the adjoining Cherry Orchard Park. It is considered that there is scope to provide new educational buildings which better relate to and made use of the adjoining park and its facilities.**

Amend Objective CS6 as follows: *It is an objective of Dublin City Council to seek the provision of a new primary school within Site No. 6, and the provision of additional primary school resources adjoining/ part of St. Ultan's NS, in conjunction with the Department of Education and Skills.*

### **3.2.11 Chapter 4: Section 4.9 Green Infrastructure & Biodiversity**

Submissions: 105, 107, 110, 112, 124.

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

A number of submissions called for the provision of more open space and walking routes and greater provision and promotion of biodiversity. One submission called for the sites along the M50 to be used as a buffer to noise and air pollution from the M50. The submission from Cllr Hazel De Nortúin and Brid Smith TD, requests that as the sites are developed, to ensure there are sufficient pocket parks provided for sports and leisure facilities, informal gatherings and for biodiversity.

The submissions from Cllr Sophie Nicoullaud calls on the Green Infrastructure objectives within the LAP to be improved, and that all goals and objectives of the LAP should include

quantitative targets. It states that people need certainty that the objectives of the SEA and LAP will be delivered in terms of open space, green links, improvements to biodiversity, control over invasive species, and suggests the creation of hot spots for biodiversity e.g. around the community garden in order to function for food production. The LAP should introduce urban agriculture as a strong alternative to the supermarket concept.

The submission from Aengus Ó Snodaigh TD and Councillor Daithí Doolan requests that the LAP include for a number of Green objectives including provision for charging points for e-cars; use of green roofs (also for allotments or caged mini pitches); use of a wild meadow in Cherry Orchard Park in line with Dublin City Council's Pollinators Plan; planting of verges, roundabouts and unused space with bright coloured shrubs and flowers; consider planting fruit bearing trees and flowering trees along the edge of Cherry Orchard Park; provision of a wood of native trees along the M50 to increase the noise mitigation and to encourage native wildlife; address invasive species and eradication plan for noxious weeds along the Canal; install solar panels on all complexes; give consideration to the provision of small wind generators along the edge of the M50 which could power the public lighting system and local public buildings such as the Sports Hall.

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

The LAP includes an objective (GI2) to enhance the planting and biodiversity of the local parks. In order to address some of the issues raised above, it is considered that additional text can be included within the LAP, for example in relation to biodiversity and planting in Cherry Orchard Park, native tree planting along the M50. Issues of invasive species and noxious weeds are dealt with in detail in the City Council's Invasive Alien Species Action Plan (2016-2020) and reference to this document can be included for in the LAP. While the Draft Plan requires each of the key sites to positively contribute to the overall green infrastructure strategy, it is proposed to insert additional text to ensure that this serves both the wider green infrastructure and also the local need of new residents.

A new sub-section on the existing allotments is also proposed. There was some concern over the ability to retain the allotments and the road link to site no. 1. While some upgrades to Cherry Orchard Green may occur as Site 1 is developed, this will not impact on the allotments, albeit some minor boundary alterations may be required to facilitate a new pedestrian footpath along the western boundary of this existing roadway, subject to detailed design.

The Strategic Environmental Assessment and the Local Area Plan are parallel working documents, with the SEA used to inform the land use decisions of the LAP, and in turn the SEA assesses the likely significant effects on the environment of implementing the LAP. The environmental protection objectives (EPOs) are a recognised way of testing the environmental effects of the LAP; used to determine whether the Plan will have a negative, positive or neutral impact on the environment, in areas of air quality and noise, biodiversity, heritage, soil, waste and water management etc. and allowing the comparison of different scenarios (as per the alternatives). Targets and indicators are set out in the SEA, in order to determine whether the LAP is meeting its environmental protection objectives. The frequency of reporting on these indicators is mid-LAP. Given the time-scale of developing sites from planning permission to construction to occupancy, it is considered that the proposed mid-term review allows for a full and practical examination of the EPOs. Notwithstanding this the implantation team that will be set up to drive the LAP forward can and will update the area committee on an on-going and regular basis.

The issue of e-cars is addressed under the heading of traffic and transportation, see proposed amendment No. 23 above.

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

Proposed Amendment No. 30:

Inset the following additional text into objective GI2: (page 57)

**GI2** To enhance the planting and biodiversity value of existing local parks **and other incidental areas of open space/ grassland.**

Proposed Amendment No. 31:

Insert new paragraph in section 4.9.2 under the heading of Cherry Orchard (new third paragraph, page 57), as follows:

**As per Section 4.7.1 it is proposed to redesign and upgrade Cherry Orchard Park to provide improved sporting amenities for the local community. Equally important in this redesign is the need to provide space for enhanced planting and biodiversity. Measures to deal with surface water drainage (SuDS) should be used in tandem with opportunities for wildflower planting and quiet areas within the park. Creating a wide tree lined route from north to south as part of the green corridor should also be accommodated, with consideration given to the provision of fruit bearing and flowering trees.**

Proposed Amendment No. 32:

Insert new text into Section 4.9.2 Proposed Green Infrastructure and Biodiversity Strategy; 2. Along the north boundary of the Grand Canal. (see also proposed amendments under amendment no. 16).

In order to fully optimise the potential of the Grand Canal to act as a “green corridor” it is imperative that any further development along its bank is set back a **minimum of 10 metres from the water’s edge** to fully optimise its potential as a recreation amenity and as a biodiversity resource for the City. This is of particular importance for any proposals to develop the Gallanstown Waterworks site. **The provision of a new pedestrian/ cycle bridge at this location shall ensure that any new structures put in place do not impact on fish passage or water flows.**

**Given the prevalence of invasive alien species that exist along the canal, notably Nuttall’s waterweed and Japanese knotweed, on-going monitoring and eradication of these flora, in accordance with the *Dublin City Invasive Alien Species Action Plan 2016-2020* shall be on-going.**

Proposed Amendment No. 33:

Insert new text into Section 4.9.2 Proposed Green Infrastructure and Biodiversity Strategy; 3. Along the boundary of the M50 (page 57), as follows:

A “greenbelt” of planting, **with a focus on native woodland trees** shall be provided along the entire western boundary of the LAP adjoining the M50, as a noise and air quality mitigating measure....

Proposed Amendment No. 34:

Insert new text into Section 4.9.2 Proposed Green Infrastructure and Biodiversity Strategy; New Parks /Greening areas (page 57), as follows:

Each of the key sites for development shall be required to positively contribute to the overall green infrastructure of the LAP area, **linking into the wider green infrastructure strategy and also serving the local need of new residents/ workers.**

Proposed Amendment No. 35:

Insert new sub-section at the end of 4.9.2 Proposed Green Infrastructure and Biodiversity Strategy (page 57), as follows:

### Allotments:

Cherry Orchard contains an area of c. 0.67ha laid out for allotments. Adjoining the Cherry Orchard Community Garden and Equine Centre, the allotments are well placed to benefit from the adjoining amenities of the equine center and have the potential to act as a thriving local “green hub”. Currently underutilised, this area contains further space for expansion within the existing footprint.

### Proposed Amendment No. 36:

Insert new objective GI7 (page 57), as follows:

**GI7: To seek the provision of green roofs where feasible as part of a green infrastructure and SuDS strategy for future developments.**

## 3.2.12 Chapter 4; Section 4.10 Physical Infrastructure

Submissions: 57, 105, 112, 114.

### Summary of Submissions:

Submissions on Physical Infrastructure related to the existing ESB overhead powerlines and existing ESB pylons located at both Bancroft Park and within the Park West area and issues around illegal dumping within the area.

#### ESB Pylons/Overhead Lines:

A number of submission were received requesting that the LAP ensure these elements of the ESB network are undergrounded as part of any redevelopment of the available lands within the LAP area on the above sites.

A submission was also received on behalf of the primary landowner in the Park West area to express support for the objectives to underground existing ESB infrastructure. While the submission also expresses a desire to take the lead in the delivery of such infrastructure the submission, it also highlights the need for the LA to secure adequate funding to implement such works. Furthermore, the submission also requests that section 4.10.6 page 60 of the Draft LAP is amended to include the following “the securing of funding and the implementation of the diversion/ undergrounding infrastructure works will not be an impediment to the granting of permission for or occupation of development”.

Submission also Requests the following amendment to site brief 6 (page 70): To delete the following text from Site brief 6: “*Overhead ESB pylons to be addressed/ undergrounded*”. (also relates to section 4.10.6, page 60)

#### Waste Management:

Submissions were also received in relation to illegal dumping within the LAP area, highlighting the need for the provision of better waste / recycling facilities within the area

### Chief Executive’s Response:

As set out in Section 4.10.5, Electricity Network within the Draft LAP, Dublin City Council has identified a number of high voltage power lines and pylons in Park West in close proximity to the M50 and within Cherry Orchard Barnville area which are a constraint on

the development potential of these lands. Dublin City Council is committed to resolving these constraints by underground / diverting the existing ESB infrastructure at these locations to fully realise the development potential of the LAP lands. In this regard it is an objective of Dublin City Council as set out within the Infrastructure Objective INF5 to “Support the undergrounding of existing high voltage overhead power lines and pylons in Barnville and throughout Park West”.

In addition to the above, Chapter 5 “Site Briefs” within the Draft LAP sets out specific development objectives for each of the key development sites within the Park West – Cherry Orchard LAP area. In this regard, the development objectives for site 5 and site 6 specifically identify existing ESB infrastructure that needs to be addressed as part of the overall development proposals for the sites. The above specific development objectives are also further supported by section 4.6.7 Building Design and Quality and objective UD6 were it is an objective of Dublin City Council “To seek the undergrounding of overhead ESB Pylons throughout Park West and at Site 5.”

As set out in Chapter 6 – Phasing and Implementation, Dublin City Council is fully committed to securing the implementation of the key principles and objectives of the Park West – Cherry Orchard LAP, and welcomes the commitment in the submission from Greenseed to support the delivery of key infrastructural requirements for the LAP and the sites in its ownership. As such it is not considered necessary to include the above text changes requested given that the delivery of infrastructure will dependant on development proposals coming forward for each of the key development sites.

As set out in Section 4.10.5 – Waste Management, Dublin City Council has identified site 4 as suitable location for the provision of glass bottle recycling within the Cherry Orchard area of the LAP and that a further additional suitable site with the Park West are of the LAP should also be identified, ideally within close proximity to other community / retail uses.

#### **Chief Executive’s Recommendation:**

##### Proposed Amendment No.37

Amend, insert text into Objective UD6 as follows: “To seek the **relocation /** undergrounding of overhead ESB **powerlines and** Pylons throughout Park West and at Site 5.”

##### Proposed Amendment No.38

Amend, insert text into Chapter 5 “Site Briefs” Site 5 Barneville Neighbourhood Site (Page 69)

“Investigate the potential for the removal / **relocation** of the existing electricity Pylon at Barnville Park”

##### Proposed Amendment No.39

Amend, insert text into Chapter 5 “Site Briefs” Site 6 Park West Avenue / Road site (Page 70)

“**Investigate the potential for the** overhead ESB **Pylons power lines** to be **addressed relocated /**undergrounded”

Proposed Amendment No.40

Insert text into Chapter 5 “Site Briefs” Site 4 M50-Cedarbrook Avenue Site (Page 68)

**“Development of the site will include for the provision of glass bottle recycling bank ideally within close proximity to other community / retail uses identified for the site”**

**3.2.13 Chapter 5: Site 2**

Submissions: 1, 47, 48

**Summary of Submissions:**

The key issue raised in relation to this site was a concern over anti-social activity; that the provision of local shops may draw gangs of youths to congregate, and this was of particular concern for senior citizens who could be living above the shops.

**Chief Executive’s Response:**

See extract from Chief Executives Response Section 3.2.4 Economic Development & Employment:

The Draft LAP proposes a small number of local retail units as part of the development of Site 2 along Cherry Orchard Avenue. The LAP seeks to local hub by consolidating the uses around the existing local community facilities (St Ultan’s N.S, Cherry Orchard Health Centre and the local Church). The Draft LAP also considers that this location would be suitable for the provision of Senior Citizens Housing given its close proximity to the local retail proposals and the existing community facilities. While there are specific design challenges associated with such developments it is considered that through good urban design practice the proposed development of local retail and senior citizens housing could be successfully delivered on Site 2 and would help create a new local neighbourhood feel to this section of the Cherry Orchard Avenue which would also be a valuable amenity to the surround existing residents. Section 4.2.3 relating to Cherry Orchard Avenue and Chapter 5 ‘Site Briefs’ (Site 2) - both highlight the specific design challenges around delivery of local retail / senior citizen housing and the new public square.

**Chief Executive’s Recommendation:**

Noted: see above

**3.2.14 Chapter 5: Site 3a**

Submissions: 105, 112, 121, 124

Cloverhill Sports and Social Club: 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 35, 36, 37, 38, 39, 40, 42, 43, 44, 45, 46, 51, 52, 53, 54, 55, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 77, 78, 79, 80, 81, 83, 84, 85, 86, 87, 88, 89, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 103, 104, 106

## **Summary of Submissions**

Divergent views and opinions were expressed in relation to Site 3a. There was support for the provision of enterprise units along this stretch in particular for incubation space for local start-ups, in addition to requests for:

1. Use of the site by Horsepower for local stables (see section 3.2.9 above).
2. Use of the site as a green planted buffer to the M50
3. Use of the site to provide sporting and recreational facilities for the Irish Prison Service staff who work in the nearby prisons (Cloverhill and Wheatfield).

A total of 90 submissions were received by and on behalf of the staff of the Irish Prison service who work in the nearby Wheatfield and Cloverhill prisons. These submissions are seeking use of site 3a for the provision of a sporting and recreational facility for the c. 800 staff who work in the prisons. Long shift working hours and security issues were referred to along with the benefit of physical exercise and open space for mental and physical health.

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

The use of the site for stables has been addressed above in Section 3.2.9, which allows for stabling to be considered for this site.

The overall land use strategy for the LAP is also addressed above in section 3.2.3. A local area plan must be prepared in accordance with the Dublin City Development Plan in place at the time of writing, in addition to regional and national planning policy. It would not be in keeping with these higher order plans to not seek the development of a site, that is just over 2ha in size, located within the M50 and in close proximity to good quality public transport links and to key employment destinations.

It is clear from the high level of submissions received from the prison staff that there is a very strong desire to provide a sporting and recreational facility for staff working in the prison. The rationale and desire for this facility is fully understood and the concept is supported, however the location for this facility is questioned. Site 3a, which is identified as a key development site of this local area plan, lies to the immediate south of a circa 2.0 Ha site, that is under the control of the Irish Prison service and in use as a surface car park for staff and visitors to the prisons. In implementing the policy for urban intensification as set out in the National planning framework it is considered that the existing surface car park should be the site for any new staff facility, with a multi-storey car park provided if required.





*Image from Google Maps, showing Prison Service surface carpark north of Site 3a.*

It is the chief Executive's recommendation to retain the proposed use of the site as an enterprise and employment facility as shown in the draft LAP, but that also allows for the idea of local stabling to be considered, on part of the site.

**Chief Executive's Recommendation:**

Submissions noted, no changes proposed.

**3.2.15 Chapter 5: Site 4**

Submissions: 57, 104, 101, 124, 125

**Summary of Submissions:**

A number of submissions addressed the proposed land use and density provision for Site 4. Some submissions expressed a desire to see this site turned into a natural park or used as a planting buffer for the M50, see section above on land use.

Other submissions addressed the density proposals for the site, with some wanting lower density and lower heights, more in keeping with Cedarbrook, and others seeking higher density and greater height due to the proximity to the train station, please see above under urban form.

**Chief Executive's Response:**



See Chief Executives Response above, Section 3.2.3 Urban Framework & Land Use Strategy, which includes the following.

“Section 4.2 Urban Framework & Land Use Strategy within the Draft LAP sets out the strategic land use proposals for the LAP lands which seeks to achieve an efficient and effective land use, linking transport and land use while also taking into account environmental considerations which played a key role, particularly in relation to noise levels and air quality in close proximity to the M50 and the railway.

Site 4 is identified as a key development site within the LAP area and development proposals include for the delivery of significant housing development along with some employment and enterprise use along the M50 to provide additional set back and buffer to the M50 for the proposed residential development. This is considered to most appropriate land use for the site and in is considered site 4 will play an important role in delivering a broad range of housing typologies across the LAP lands which in turn acts to help address the shortfall of housing supply both in the immediate area and the wider Dublin area.”

See also Chief Executives Response above, Section 3.2.7 Urban Form and Design, which includes the following.

“Section 4.6.5 Future Development Density and 4.6.6 Building Heights within the Draft LAP set out the density strategy and the building heights strategy for the LAP lands. The LAP sets out a graded approach to density considering both the built context and proximity to public transport infrastructure such as the train station and bus routes. It is considered that the LAP allows for sufficient flexibility in broadly identifying three density ranges; (Low Density of up to 50units/HA) appropriate for areas located further from the train station and/or areas adjoining existing low density residential developments; (Medium Density of 50 -100 units/HA) for areas within easy walkable distance from the Train Station; (Higher Density in excess of 100 units/HA) for areas located within the immediate vicinity of the Train Station. “

**Chief Executive’s Recommendation:**

Noted: See above, matters raised already addressed in CE report.

**3.2.16 Chapter 5: Site 5**

Submission No. 111

**Summary of Submissions:**

Two key issues emerged with specific reference to Site 5. One was a request to use this site for the provision of new local schools, both primary and secondary; and the second was a request to use this site for a large convenience store (supermarket).

**Chief Executive’s Response:**

See Chief Executives Response above, Section 3.2.8 Community, Education, Recreation and childcare Facilities, which includes the following.

“The Planning Department has worked with the Department of Education and Skills in preparing the Draft LAP for Park West – Cherry Orchard, and the Plan clearly makes provision for a new primary school to be located on Site No. 6 to the south-east of the site, with the rationale for this location set out in Section 4.7.5 (page 53) of the Plan. Following

a further submission from the DES as part of the statutory consultation process on the Draft Plan, further amendments are now proposed to include a specific reference to consider additional educational need on the Z15 lands surrounding St. Ultan's NS, please see Proposed Amendment No 2 above.

With regards to the future need for post-primary schools, and having regard to the consultations with DES and their formal submission, it is considered that this can best be accommodated to the immediate east of the proposed new school site in Site No. 6, subject to rezoning and Masterplanning. DCC will continue to work with the DES in preparing plans for these areas. Detailed consideration was also given to the use of Site No. 5 for a school campus, following the submission from Cllr. Daithi Doolan. However, on balance given that there is no immediate need for such a facility identified by the DES, reserving this site for a school would effectively sterilise this site for potentially the life of the LAP, and remove the capacity to deliver much needed housing to the order of c. 150-200 units. The Council has secured URDF funding to examine the Z6 lands at Park West Industrial Estate and further east into Inchicore, and this work is due to commence in the latter half of 2019, in conjunction with South Dublin County Council (in examining their REGEN lands south of the Canal). The provision of a secondary school that will cater for this area will be considered as part of this process, in consultation with the Department of Education and Skills."

See Chief Executives Response above, Section 3.2.3 Urban Framework & Land Use Strategy and section 3.2.4 Economic Development & Employment, which includes the following.

"Section 4.2 Urban Framework & Land Use Strategy within the Draft LAP sets out the strategic land use proposals for the LAP lands which seeks to achieve an efficient and effective land use, linking transport and land use while also taking into account environmental considerations which played a key role, particularly in relation to noise levels and air quality in close proximity to the M50 and the railway.

The Draft LAP acknowledges the specific need for the provision of a Supermarket to serve both the Cherry Orchard and Park West area and in this regard the Draft LAP has identified a site immediately to the north of the train station within Site 4 as the most suitable location for such a use. This location provide opportunities to optimise the level differences that exist at this location and also provide opportunity to deliver a non-noise sensitive use at this location. "

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

Noted: See above, matters raised already addressed in CE report. Please see also proposed amendment No. 41 outlined below:

#### **Proposed Amendment No. 41:**

Amend, insert new text into Section 4.7.5 Education (page 53)

Insert new text at end of this section: **In addition, the LAP supports the expansion of the existing St. Ultan's NS and/or the provision of an additional primary school, within the Z15 lands surround the existing school. Currently underutilised these lands present a poor interface with the adjoining Cherry Orchard Park. It is considered that there is scope to provide new educational buildings which better relate to and made use of the adjoining park and its facilities.**

Amend Objective CS6 as follows: *It is an objective of Dublin City Council to seek the provision of a new primary school within Site No. 6, and the provision of additional primary school resources adjoining/ part of St. Ultan's NS, in conjunction with the Department of Education and Skills.*

### 3.2.17 Chapter 5: Site 6

Submission no. 114:

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

Submission was received from Greenseed Ltd (Landowners) welcoming the addition of retail along Park West Avenue which they believe they can facilitate through the development of Site 6. However they also consider that the positioning of additional retail/ commercial floor space south of the existing Aspect Hotel would also serve to animate this area of the streetscape and provide a link to the established retail/ commercial uses within Park West Plaza. The submission requests that Fig 37 is amended to extend the retail zone south of the Aspect Hotel as far as the Park West Avenue/ Park West Road roundabout.

The submission also expressed support for the objectives to underground existing ESB infrastructure. While the submission also expresses a desire to take the lead in the delivery of such infrastructure the submission, it also highlights the need for the LA to secure adequate funding to implement such works. Furthermore, the submission also requests that section 4.10.6 page 60 of the Draft LAP is amended to include the following “the securing of funding and the implementation of the diversion/ undergrounding infrastructure works will not be an impediment to the granting of permission for or occupation of development”.

Submission also Requests the following amendment to site brief 6 (page 70): To delete the following text from Site brief 6: *“Overhead ESB pylons to be addressed/ undergrounded”*. (also relates to section 4.10.6, page 60)

#### **Chief Executive’s Response:**

See also Chief Executives Response above, section 3.2.12 Physical Infrastructure, which includes the following.

“Section 4.3.2 Retail Provision within the Draft LAP deals specifically with retail provision and identifies two new locations for additional local retail in addition to supporting the existing Park West Plaza. The proposals for new local retail at Cherry Orchard Avenue and in the vicinity of the Park West railway station takes into account the potential for both the existing and new population to support and sustain the provision of additional retail at these locations. Dublin City Council would have concerns over the provision of further additional retail above what is already proposed within the LAP and as such would not be supportive of extending the retail use along the full length of Park West Avenue beyond the Aspect hotel to meet with the Park West Plaza.”

See also Chief Executives Response above, section 3.2.3 Economic Development and employment (Retail Section), which includes the following.

“As set out within the Draft LAP, Chapter 6 – Phasing and Implementation, Dublin City Council is fully committed to securing the implementation of the key principles and objectives of the Park West – Cherry Orchard LAP, and welcomes the commitment in the submission from Greenseed to support the delivery of key infrastructural requirements for the LAP and the sites in its ownership. As such it is not considered necessary to include to above text changes requested given that the delivery of infrastructure will dependant on development proposals coming forward for each of the key development sites.”

Chief Executive's Recommendation:

Proposed Amendment No.42

Amend, insert text into Objective UD6 as follows: "To seek the **relocation /** undergrounding of overhead ESB **powerlines and** Pylons throughout Park West and at Site 5."

**3.2.18 Chapter 5: Site 7 & 8**

Noted: see above

**3.2.19 Miscellaneous Submissions**

Submissions: No. 10, No. 34, No. 41, No. 73, No. 99, No.116

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

## 4 Overall Summary of Submissions and Recommendation

Submissions received generally welcomed the Local Area Plan and the aspiration to make Park West and Cherry Orchard an attractive and identifiable place delivering a range of residential typologies alongside community and recreational facilities.

Key areas of support included the support for the delivery of a new supermarket at the proposed location (Site 4), the delivery of new Community and Social Enterprise Hub (as previously identified within the 'Making Cherry Orchard a Better Place Plan'), for the Park and Ride facility proposed for (Site 4) beside the train station, the proposed improvements in Cherry Orchard Park including for outdoor all weather pitches and improved changing facilities, and the provision of a new primary school on Site No. 6. Support was also expressed by other landowners for the delivery of key infrastructural requirements for the LAP within the sites not in public ownership.

Divergent views and opinions were expressed in relation to Site 3a. There was support for the provision of enterprise units along this stretch in particular for incubation space for local start-ups, in addition to requests for the provision of horse owners' facility/ stables at this location. A request was also received for a portion of the land to be set aside for the provision of a sports and recreational facility to be developed as an amenity for the employees of Cloverhill Prison.

Areas of concern related primarily to existing traffic congestion, poor public transport provision and facilities, density and building heights, noise and air pollution in relation to sites in close proximity to the M50, provision of additional commercial / office space within the area, housing typologies and the provision of apartments versus houses, a lack of play facilities, anti-social activity in the area and the need for adequate policing.

Submissions received in relation to densities and building heights varied between submission requesting increased densities and submissions requesting reduced densities and building heights. There were also a number of submissions, mainly from existing residents, expressing concern over the densities and in particular the heights proposed within the Draft LAP. The main issue within these submissions were around the proposed heights planned for housing development within the Draft LAP, which would not be in keeping with the other buildings in the area. There is concern that the large scale blocks of flats proposed are not conducive to cohesive community living. However there were also a number of submission requesting that densities should be increased beyond those currently set out within the Draft LAP in order to maximise development potential of the LAP lands given the existing/proposed public transport infrastructure in close proximity of the plan lands.

Other proposed amendments include minor typographical text changes, graphical errors and/or discrepancies which will be amended in the final local area plan and have not been included in this report.

## **5 Conclusion and Chief Executive's Recommendation**

As outlined above the Chief Executive's Report makes a number of recommendations which if accepted would not materially alter the Draft Plan.

The issuing of this Chief Executive's Report (dated 30<sup>th</sup> August 2019) marks the start of the period for member's consideration, during which time members of the City Council may submit motions for consideration (last day for motions, 13th September 2019).

At the City Council meeting on the 7<sup>rd</sup> October 2017, the members of the Council may: -

**adopt the Plan as publically displayed;**

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

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

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

**revoke the plan.**

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

**Appendix 1: List of All Persons or Bodies that made submissions/ observations on the Draft Park West – Cherry Orchard Local Area Plan.**

No.	Name	On Behalf Of/ Organisation
1	Fr. Michael Murtagh	Cherry Orchard Parish Church
2	Aoife Malone	Cloverhill Sports and Social Club
3	Mick Walsh	Cloverhill Sports and Social Club
4	Conor Jordan	Cloverhill Sports and Social Club
5	Mick Flood	Cloverhill Sports and Social Club
6	Derek O'Connor	Cloverhill Sports and Social Club
7	Paul Turner	Cloverhill Sports and Social Club
8	Amanda Suttom	Cloverhill Sports and Social Club
9	Catherine Quinn	Cloverhill Sports and Social Club
10	Stephen Brennan	Cloverhill Sports and Social Club
11	Ciaran Kennedy	Cloverhill Sports and Social Club
12	N Cloak	Cloverhill Sports and Social Club
13	S Lavin	Cloverhill Sports and Social Club
14	Thomas Donegan	Cloverhill Sports and Social Club
15	Anthony Hughes	Cloverhill Sports and Social Club
16	Noel Smith	Cloverhill Sports and Social Club
17	David Byrne	Cloverhill Sports and Social Club
18	Noel Keogh	Cloverhill Sports and Social Club
19	Garrett Smith	Cloverhill Sports and Social Club
20	Trevor McDonald	Cloverhill Sports and Social Club
21	Shane Walsh	Cloverhill Sports and Social Club
22	Mark Wade	Cloverhill Sports and Social Club
23	Aishlin	Cloverhill Sports and Social Club
24	Shaun Gallery	Cloverhill Sports and Social Club
25	Sean Furey	Cloverhill Sports and Social Club

26	John Mullins	Cloverhill Sports and Social Club
27	Pauriac Kilbride	Cloverhill Sports and Social Club
28	Niall Kennedy	Cloverhill Sports and Social Club
29	Brian Kelleher	Cloverhill Sports and Social Club
30	Cathal Burns	Cloverhill Sports and Social Club
31	Michael Dempsey	Cloverhill Sports and Social Club
32	Aine Deasy	Cloverhill Sports and Social Club
33	Patrick Dunne	Cloverhill Sports and Social Club
34	Trevor Dowling	
35	Lee Hogan	Cloverhill Sports and Social Club
36	Enda Bradish	Cloverhill Sports and Social Club
37	Wayne Maguire	Cloverhill Sports and Social Club
38	Ciaran O'Brien	Cloverhill Sports and Social Club
39	Ken Murphy	Cloverhill Sports and Social Club
40	Gary Doyle	Cloverhill Sports and Social Club
41		
42	Paul Cushen	Cloverhill Sports and Social Club
43	Jennifer McGrath	
44	Owen Houlihan	Cloverhill Sports and Social Club
45	Jonathon Gorman	Cloverhill Sports and Social Club
46	Keith Shannon	Cloverhill Sports and Social Club
47	Siobhan Palmer	
48	Teresa Douglas	
49	Eimear Humphreys	
50	Catherine Curran	
51	Liam Boland	Cloverhill Sports and Social Club
52	Keith Tracy	Cloverhill Sports and Social Club
53	Anthony Kelly	Cloverhill Sports and Social Club



54	C. Cassidy	Cloverhill Sports and Social Club
55	Alan McCarthy	Cloverhill Sports and Social Club
56	Rosin O'Callaghan	Inland Fisheries Ireland
57	Stefka Stoyanova	
58	Roshan Jamshidi	
59	John Daniel	Cloverhill Sports and Social Club
60	Mark Kelleherxz	Cloverhill Sports and Social Club
61	John Collins	Cloverhill Sports and Social Club
62	David Doyle	Cloverhill Sports and Social Club
63	Neil Tracy	Cloverhill Sports and Social Club
64	Martin Farrelly	Cloverhill Sports and Social Club
65	Simon Doyle	Cloverhill Sports and Social Club
66	John Ryan	Cloverhill Sports and Social Club
67	Michelle McManus	Cloverhill Sports and Social Club
68	Donal O'Reilly	Cloverhill Sports and Social Club
69	Mark	Cloverhill Sports and Social Club
70	Ken Murphy	Cloverhill Sports and Social Club
71	Bill Hislop	Cloverhill Sports and Social Club
72	Layra Ward	Cloverhill Sports and Social Club
73	Pamela Fitzpatrick	Cloverhill Sports and Social Club
74	Niall Kirwan	Cloverhill Sports and Social Club
75	Frances Forsyth	Cloverhill Sports and Social Club
76	Niamh McDonald	Irish Water
77	Joseph Foley	Cloverhill Sports and Social Club
78	Edward Fitzsimons	Cloverhill Sports and Social Club
79	Julian Semionov	Cloverhill Sports and Social Club
80	David O'Connor	Cloverhill Sports and Social Club
81	Tom Donovan	Cloverhill Sports and Social Club

82	David Clements	National Transport Authority
83	Cloverhill Prison Sports and Leisure Club	Cloverhill Prison Sports and Leisure Club
84	Eoin Floor	Cloverhill Sports and Social Club
85	Juliette Cadogan	Cloverhill Sports and Social Club
86	Suzette Bedard	Cloverhill Sports and Social Club
87	Liam Higgins	Cloverhill Sports and Social Club
88	Deva A Sundaram	Cloverhill Sports and Social Club
89	Gerard Plunkett	Cloverhill Sports and Social Club
90	Cian Murphy	
91	Eilish Byrne	Cloverhill Sports and Social Club
92	Dorothy McCabe	Cloverhill Sports and Social Club
93	Mairead Murray	Cloverhill Sports and Social Club
94	Dr. Mohsin Moola	Cloverhill Sports and Social Club
95	Mark Garvey	Cloverhill Sports and Social Club
96	Killian Kavanagh	Cloverhill Sports and Social Club
97	Laura Maher	Cloverhill Sports and Social Club
98	Ray Scullion	Cloverhill Sports and Social Club
99	Stephen Mculkearns	Cloverhill Sports and Social Club
100	Steve Lyons	Cloverhill Sports and Social Club
101	Mary McMahon	Land Development Agency
102	Aideen Foley	
103	Barry Corby	Cloverhill Sports and Social Club
104	Alan Conroy	Cloverhill Sports and Social Club
105	Cllr Sophie Nicoullaud	Dublin City Council Councillor
106	Dominic Clerkin	Irish Prison Service staff
107	Austin Gill	
108	Anne Fitzgerald	Ballyfermot Chapelizod Partnership
109	Sinead Healy	Dublin Chamber of Commerce

110	Leon	
111	Cara O'Hare	
112	Aengus Ó Snodaigh TD & Councillor Daithí Doolan	Dublin TD & Dublin City Council Councillor
113	Connor Rooney	Dept of Culture, Heritage and the Gaeltacht
114	BMA Planning	Greenseed Limited
115	Deirdre Kirwan	South Dublin County Council
116	OPR invalid	
117	Natasha Crudden	Transport Infrastructure Ireland (TII)
118	Office of the Planning Regulator	Office of the Planning Regulator
119	Nora Carey	Office of Public Works
120	Alan Hanlon	Dept of Education and Skills
121	David McGovern	FamiliBase / Horsepower
122	David McGovern	Cherry Orchard Running Club
123	Nuala NicGiobúin	Dublin City South CYPSC
124	Cllr Hazel De Nortuin & Brid Smith TD	Dublin City Council Councillor
125	Siobhan Palmer	Cedarbrook Residents Association
126	Siobhan Palmer	
Late	Cherry Orchard Equine Centre.	

To the Lord Mayor and  
Members of Dublin City Council

Report No. 275/2019  
Report of the Chief Executive



## 6 Addendum

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**DRAFT PARK WEST – CHERRY ORCHARD LOCAL AREA PLAN 2019  
CHIEF EXECUTIVE’S REPORT ON SUBMISSIONS FROM PUBLIC DISPLAY  
OF DRAFT PLAN (original report dated 30<sup>th</sup> August 2019)**

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**Owen Keegan  
CHIEF EXECUTIVE,  
DUBLIN CITY COUNCIL  
5<sup>th</sup> September 2019**

### 3.2.20 Chapter 6: Phasing and Implementation

Submission Nos: 105, 108, 114, 123, 124, 125

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

Submissions on Chapter 6, Phasing and Implementation, included requests for phasing to ensure upfront delivery of supporting community and social infrastructure, before placing additional demands on services through the provision of new housing, and in particular to focus on the social and community aspects identified in the Making Chery Orchard Better Action Area Plan. Terms such as “seek to” or “seek to achieve”, should be replaced with more definitive terms as to when infrastructure will be in place. There was also a request for the Cherry Orchard Development Group (made of the following agencies/ groups: CODG, TUSLA, Ballyfermot Chapelizod Partnership, DCC, Community reps, CDETB, DEIS Schools, Park West Business Reps, An Garda Síochána Ballyfermot) to join any forthcoming DCC LAP implementation group.

A query from the Cedarbrook Residents Association questioned who will be the builder for the developments, and how will the development be financed.

The submission on behalf of Greenseed Ltd (owners of sites 6, 7 and 8) welcomed the commitment of the planning authority to adopt an active land management approach to progress and secure the objectives of the LAP, stating that Greenseed will work with the planning authority to drive forward the achievement of the LAP objectives. The commitment to flexibility within the implementation and phasing of development was also welcomed, along with the commitment to seek funding to unlock infrastructure impediments and work with the Local Authority to secure available funding.

#### **Chief Executive’s Response:**

As set out in Section 6.1 of the Draft LAP, Dublin City Council is fully committed to securing the implementation of the key principles and objectives of the Park West – Cherry Orchard LAP, and welcomes the commitment in the submission from Greenseed to similarly drive forward in delivering on the objectives for sites 6, 7 and 8 in its ownership.

The site briefs set out in chapter 5 of the Draft LAP purposefully align the development of the sites with the delivery of certain key infrastructure, e.g. the development of Site 1 provides for an important new link road between Cherry Orchard and Ballyfermot Road; Site 2 provides for the delivery of local shops, a new civic/green space, senior citizen accommodation, in addition to a new green route and providing space for the expansion of the Cherry Orchard Community Childcare Centre; site 6 requires that land be made available for a new primary school in consultation with DES. In setting out the site briefs in this manner the Plan is ensuring that as sites are development, key social infrastructure is occurring in tandem.

The Plan also identifies two key amenity sites, which are seen as fundamental in delivering on the required community/ social/ sporting and recreational needs of the area. Securing funding and implementing the delivery of these sites is a core element of the LAP and will be progressed as such. Further opportunities for local consultation will be

fundamental in identifying the site briefs for these facilities, as set out in 4.7.1 Cherry Orchard Park and Objective CS1. In order to highlight the need for further local engagement it is proposed that additional text to this effect be inserted into Chapter 5: Key Amenity Sites, and in Section 6.1 Role of Dublin City Council. Further consultation with the Cherry Orchard Development Group will also be required in order to identify the specific requirements for the Community and Social Enterprise Hub and the most appropriate site for this facility. Provision for this can also be inserted into Section 4.3.4 of the Plan.

Given the housing crisis that the City is experiencing it is not considered appropriate at this time to stall the delivery of much needed new homes, rather to use the LAP and the delivery of new homes to leverage support and funding for the delivery of the accompanying social and physical infrastructure needed.

**Chief Executive's Recommendation:**

**Proposed Amendment No. 43:**

Insert the following text into Chapter 5: Amenity Development Sites (page 73), at end of section:

**Public Consultation:**

**The delivery of these two key amenity sites is fundamental in meeting the community, amenity and recreational needs of Park West and Cherry Orchard. Further consultation on the specific requirements of these two sites will take place with local and national stakeholders to ensure optimal benefit to the surrounding community.**

And also Insert the following text into Section 6.1 Role of Dublin City Council (page 74), at the end of the third paragraph:

The council has a wider role to play in relation to achieving a successful outcome, in that it is responsible for the delivery of a range of public services that are critical to making the Cherry Orchard and Park West area a successful, vibrant and sustainable neighbourhood. Dublin City Council are committed to continued investment in community infrastructure for the area, building additional social housing, community buildings, parks and open space, and recreational facilities: all of which will play an important role in delivering on the overall vision for the area. **Given the importance of the amenity development sites in delivering key elements of social and community infrastructure, further consultation with the local community will form an important role in their delivery.**

**Proposed Amendment No. 44:**

Insert the following new text into Section 4.3.4 Community and Social Enterprise Hub, in the second paragraph (page 38).

“The LAP supports the provision of this centre, and notes a number of locations which could accommodate this facility, subject to timing considerations and further information on the size and nature of activities which the centre will offer, or indeed it could be a multi-campus approach depending on the requirements. **Further consultation with the Cherry Orchard**

**Development Group is required to identify the optimal site location.** Suitable sites include: ..”