

Review of the Dublin City Development Plan 2016-2022 and Preparation of a New City Development Plan 2022-2028

Chief Executive's Report on Draft Plan Consultation Process

Report to Council Under Section 12 (4) of the Planning and Development Act 2000, (as amended)

Volume 1 Issues Raised and Chief Executive's Response & Recommendations

29th April 2022

Report No. 119 2022

Table of Contents

| | |
|--|-----|
| Part 1: Introduction | 5 |
| Overview..... | 6 |
| Format of Report..... | 6 |
| Submissions | 7 |
| Consultation Process..... | 7 |
| Strategic Environmental Assessment (SEA), Strategic Flood Risk Assessment (SFRA) and Appropriate Assessment (AA). | 11 |
| Next Steps | 11 |
| Timetable for Completion..... | 12 |
| Part 2: Summary of Submissions by The Eastern Midlands Regional Assembly, The National Transport Authority and the Office of the Planning Regulator, and the Chief Executive's Opinion & Recommendations | 13 |
| Submission: Eastern and Midland Regional Assembly | 14 |
| Submission: Office of the Planning Regulator | 25 |
| Submission: National Transport Authority | 76 |
| Part 3: Summary of Submissions & the Chief Executive's Response & Recommendations..... | 91 |
| Volume 1 Written Statement..... | 92 |
| Chapter 1: Strategic Context and Vision..... | 93 |
| Chapter 2: Core Strategy..... | 105 |
| Chapter 3: Climate Action..... | 125 |
| Chapter 4: Shape and Structure of the City | 139 |
| Chapter 5: Quality Housing and Sustainable Neighbourhoods..... | 150 |
| Chapter 6: City Economy and Enterprise..... | 170 |
| Chapter 7: The City Centre, Urban Villages and Retail..... | 177 |
| Chapter 8: Sustainable Movement and Transport | 195 |
| Chapter 9: Sustainable Environmental Infrastructure and Flood Risk | 215 |
| Chapter 10: Green Infrastructure and Recreation..... | 237 |
| Chapter 11: Built Heritage and Archaeology..... | 260 |
| Chapter 12: Culture | 288 |
| Chapter 13: Strategic Development Regeneration Areas (SDRAs)..... | 308 |
| Chapter 14: Land Use Zoning..... | 362 |
| Chapter 15: Development Standards | 397 |
| Chapter 16: Monitoring and Implementation..... | 408 |
| Chapter 17: Glossary & Acronyms | 411 |
| Volume 2 - Appendices..... | 413 |
| Appendix 1 | 415 |

| | |
|--|-----|
| Appendix 3 | 427 |
| Appendix 5 | 430 |
| Appendix 6 | 432 |
| Appendix 9 | 434 |
| Appendix 15 | 435 |
| Appendix 16 | 436 |
| Appendix 17 | 441 |
| Volume 3 - Zoning Maps..... | 444 |
| Map A..... | 448 |
| Map B..... | 473 |
| Map C | 552 |
| Map D | 573 |
| Map E..... | 593 |
| Map F | 731 |
| Map G | 752 |
| Map H | 773 |
| Technical and Other Amendments To Zoning and Graphic Maps | 812 |
| Volume 4 - Record of Protected Structures | 822 |
| Volume 5 – Strategic Environmental Assessment | 882 |
| Volume 6 – Appropriate Assessment..... | 886 |
| Volume 7 – Strategic Flood Risk Assessment..... | 890 |
| Part 4: List of Persons / Bodies that Made Submissions/ Observations | 910 |

Part 1: Introduction

Overview

The Chief Executive's Report on submissions to the Draft Dublin City Development Plan 2022-2028 has been prepared in accordance with Section 12(4) of the Planning and Development Act 2000 (as amended).

This report forms part of the statutory procedure for the preparation of the Dublin City Development Plan. The process of reviewing the 2016- 2022 City Development Plan and the preparation of the new Plan formally commenced in December 2020 with an eight-week Pre - Draft public consultation phase. An Issues Paper was circulated and public consultation exercise undertaken including five webinars. During this phase, a total of 752 submissions were received and a Chief Executive's Report was prepared summarising the submissions raised and recommendations for topics and information to be contained in the Draft Plan. A Special Council meeting held by June 2021 with the Elected Members of the Council and over 1,000 Directions were issued requesting strategic matters to be addressed in the Draft Plan.

A Draft Plan was prepared and circulated to the elected members in October 2021. This was considered and agreed by the elected members at a Special Council Meeting for seven-weeks in November 2021.

The Draft Plan was put on public display on 25th November 2021 for a period of 12 weeks until 14th February 2022. Further details on the consultation process are set out in Section 4.

Format of Report

The purpose of this report is to report on the written submissions/ observations received following the public display of the Draft Dublin City Development Plan 2022-2028. The report will set out the Chief Executive's response to the issues raised in the submissions/ observations and will make recommendations on amendments to the Draft Plan, as appropriate.

The report is structured as follows:

Part 1: Introduction

Part 2: Summary of Submissions by The Eastern Midlands Regional Assembly, The National Transport Authority and the Office of the Planning Regulator, and the Chief Executive's Opinion & Recommendations

Part 3: Chief Executive's Report on Submissions.

This will provide a summary of the key issues raised in the submissions and the recommendations of the Chief Executive to these issues.

Part 4: List of persons / bodies that made submissions/ observations.

The layout of this report is similar to the Draft Plan in that each topic is dealt with in volume, chapter and section order for ease of reference. In instances where there are no submissions / observations on a particular topic, the corresponding section does not appear in this report.

In the event of minor typographical errors or discrepancies, these will be amended in the Draft Plan. Similarly, where draft plans or policy documents, prepared by other bodies, have been updated or approved during the development plan preparation process, these will be amended

accordingly in the final Development Plan. Numerical data, particularly in the Core Strategy, will also be updated as necessary.

Recommendations for amendments to the Draft Plan are shown by way of bold green and underlined text.

Recommendations for deletion are shown in bold red text with strike through.

To assist those utilising a screen reader:

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

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

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

Submissions

A total of 4,323 no. submissions were received during the public display period of the Draft Plan. This represents an increase of over 2,800 in submissions / observations at the same stage during the 2016-2022 Development Plan.

The submissions / observations received are set out in Part 3 and grouped thematically under each chapter for Volume 1 of the written statement as well as the other volumes of the Draft Plan – 2 to 7. A list of all those who made a submission is set out in Part 4. Each submission / observation received has been fully considered and the wide range of issues raised have been grouped under separate topics in chapter and section order.

In a similar manner to the submissions received at pre-draft stage, it is clear that the citizens of Dublin care strongly about what happens in the city and how it should develop in a sustainable way in the future. Whilst many of the issues raised related to the Draft City Development Plan, there were also a number of issues raised that related to other operational areas or matters more appropriate to Local Area Plans or other service area Plans.

The Council wishes to express its appreciation to those who made submissions /observations and engaged with the consultation process.

Consultation Process

The Draft Plan was on public display online from November 25th 2021 to February 14th 2022. The Draft Plan was also available to view during this period at the Civic Offices, Wood Quay by appointment. Copies of all plan documentation were also made available at all area offices and all public libraries during the consultation period.

Due to Covid – 19 restrictions, a number of alternative and innovative public consultation options were also made available to inform the public of the new Draft Plan. Below is a summary of the initiatives employed during the public consultation process:

1) Submissions Portal

Produced by CiviQ and managed by the CDP team. The submissions portal was created to be user friendly, encouraging users to make submissions online rather than via historic means such as e-mail and post. However, recognising that not all are familiar with technology, submissions were also accepted by post. All submissions received an acknowledgement from the City Council thanking them for their submission and are considered in this report.

All written submissions (including attachments) are available, in full, online. This enables members of the general public, and others, to view each submission electronically.

2) Social Media Campaign and Development Plan Video

This involved a series of targeted 'press releases' via social media (using Instagram, Twitter & Facebook). An engaging subtitled video was also prepared inviting the public to make a submission on the draft Plan, and this was circulated through all DCC social media channels.

For clarity, 'Impressions' means the number of times people saw the tweet/post and 'Total Engagement' means the total number of people who interacted in some way with the tweet/post. 'Reach' means the number of people reached by the post/tweet. To date there have been:

Twitter: over the 12-week public consultation there were a total of 38,565 'impressions' with a 'total engagement' of 957. 61 'retweets' were made and there were 56 'likes'.

Facebook: The Facebook posts had an overall reach of 4,982 people, with 56 of these resulting in total 'engagements' – this is the number of people who shared or commented on the post.

Instagram: The Instagram posts had an overall reach of 6,857 people.

LinkedIn: 2,000 likes and 150 views.

Councillors were also encouraged to engage in this process disseminating information across their social media accounts and to their constituents. Guidance notes and email reminders were issued to the elected members asking them to share information about the public consultation process.

3) Website

A dedicated website was set up for the Development Plan review process – www.dublincitydevelopmentplan.ie. There were over 21,000 hits on the Council's dedicated Development Plan web site during the public display period.

4) Public Information Sessions

A series of public information sessions were held throughout the consultation process including:

18th January: 10-1

26th January: 2-5

3rd of February: 5-8

During these times, members of the public could make an appointment with a member of the Development Plan team to answer any questions or queries in relation to the Draft Plan.

In addition to these times, there was a dedicated phone number and email address for members of the public to contact the development plan team with a query.

5) Bus Stop/Big Belly Bins Advertisements

DCC made use of a wide number of bus shelters, big belly bins and large poster advertising stands to advertise and these were used during the consultation period. Eye catching posters were specially designed to be erected in various bus stops and 56 of the big belly bins in 18 parks. The bus stops and bins were chosen for their high-profile location, geographic spread and frequency of use.

6) Targeted Distribution and Communication with Organisations and Networks

Information regarding the Draft Plan was sent to a number of residents' associations, community groups, business interests and other stakeholder organisations. In addition, a series of presentations regarding the Draft Plan were delivered to the SPC committees.

7) Digital Bulletin and Staff Awareness

Information regarding the Development Plan was issued in the City Council's Digital Bulletin which is issued to all staff of the organisation, including those who have retired.

8) Comhairle na Óg

Comhairle na nÓg means Youth Council, it provides young people with an opportunity to discuss and debate matters of relevance to them and their community.

Staff from the Development Plan team met with Comhairle na nÓg on January 15th 2022; at which a presentation and discussion was held on the Draft Plan. The presentation focussed on:

- outlining the plan process;
- giving feedback on how each of the issues the group had raised at the pre-draft stage has been addressed in the Draft Plan and
- showing how they can look up the text and the maps themselves to see what policies apply to their local area.

The group asked a number of questions about the process and key themes in the Plan and were appreciative of the feedback on the issues they had previously raised - namely climate change, community and leisure facilities, housing, sustainable transport, retail and heritage. The group were encouraged to consider writing a submission themselves and raising the consultation on the Draft Plan at home and within their communities.

9) Media Engagement

In November 2021, to launch the Draft Plan consultation, a photocall was organised with Dublin's Lord Mayor Alison Gilliland. The accompanying press release centred on the messaging that the Draft Plan was on display and how to make a submission. City Planning Officer at Dublin City Council and Deputy City Planner at Dublin City Council were the spokespeople for the campaign. A social media content plan was also developed to coincide with the launch date of November 25th. The press release and photographs were issued to all

national, Dublin regional and digital news outlets. A further press release was issued on January 2022, to remind the public that the closing date for submissions was approaching.

Exclusive and proactive media coverage was achieved including:

102 pieces of media coverage was achieved including 69 broadcasts, 3 print, 13 online, 17 social posts.

10) Accessibility

To improve the accessibility of the documentation, a summarised, NALA (National Adult Literacy Agency) approved plain English executive summary of the Plan was published on the web site and made available to the public. All documentation is designed to be accessible.

11) Irish Language

All of the Draft Plan documentation were published in the Irish language and made available to the public on line and as part of the public display at public libraries and area offices.

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

In accordance with the requirements of Article 6(3) of the EU Habitats Directive (92/43/EEC) on the Conservation of Natural Habitats and of Wild Fauna and Flora; the Planning and Development Act 2000 (Part XAB) (as amended); and the European Communities (Birds and Natural Habitats) Regulations 2011 to 2015, the Planning Authority has undertaken an Appropriate Assessment of the Chief Executive's Report on submissions received for the Draft City Development Plan.

The preparation and adoption of the City Development Plan 2022-2028 is subjected to Appropriate Assessment, as required by the European Habitats Directive (92/43/EEC). The Appropriate Assessment is a focused and detailed impact assessment of the implications of the City Development Plan 2022-2028, alone and in combination with other plans and projects, on the integrity of European sites in view of the conservation objectives of the European sites.

The Appropriate Assessment process has informed the Chief Executive's Report on submissions received on the Draft Development Plan 2022-2028 so that it can be implemented successfully without having adverse effects on the integrity of European sites. The Appropriate Assessment report has determined that, assuming the successful implementation of the mitigation measures contained within the plan, there will be no adverse effects on the integrity of European sites arising from the plan in isolation or in combination with other plans and projects.

In compliance with the Strategic Environmental Assessment Directive (2001/42/EC) and in accordance with Article 13B of the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436 of 2004) (as amended), the Planning Authority has carried out a Strategic Environmental Assessment (SEA) as part of the preparation of the Draft Development Plan.

The Strategic Environmental Assessment process has informed the Chief Executive's Report on Submissions received on the Draft Development Plan 2022-2028 so that it can be implemented successfully without having adverse effects on the environment. All amendments proposed to the plan have been screened for likely significant effects and it has been determined that assuming the successful implementation of mitigation measures contained within the Plan, there will be no significant impact on the environmental receptors as a result of implementing the Plan.

Next Steps

The Members shall consider the Draft Plan and the Chief Executive's Report and such consideration shall be completed within twelve weeks of the submission of the Report to the Members. Where, following consideration of the Draft Development Plan and the Chief Executive's Report, it appears to the Members that the Draft Plan should be accepted or amended, they may by resolution, accept or amend the Draft and make the Development Plan accordingly.

Should amendments be proposed which would constitute material alterations to the Draft Plan, there is a further public display period giving people an opportunity to comment on the proposed amendments only. This is followed by the preparation of a Chief Executive's Report for Members on any submissions/observations received. Members may then make the Development Plan with or without the proposed amendments, or with modifications to the proposed amendments, as they consider appropriate.

Timetable for Completion

To assist Members in their consideration of the Draft Plan and the Chief Executive's Report on the submissions/observations received, Information Sessions for Members only have been arranged for the following dates:

4th May 2.30 pm

5th May 2.30 pm

The Chief Executive's Report on the submissions/observations received and the Draft Plan will be considered at a Special Meetings of the City Council on the 5th, 6th and 7th of July.

The consideration of the Draft Plan and the Chief Executive's Report must be completed twelve weeks after the submission of the Chief Executive's Report to the Members.

The timetable for the completion of the Development Plan is set out below:

| Date | Details |
|---|--|
| 29th April 2022 | Report on Submissions/ Observations to be circulated to Councillors |
| 27th May 2022 | Last date for receipt of motions from Councillors |
| 24th June 2022 | Chief Executive's Report on motions circulated to Councillors |
| 5-7th July 2022 | Special Council meetings to be held (as required during this period) |
| 27th July to 1st of September 2022 | If the draft is amended on foot of the Special Meeting, 2nd Public Display of Draft will commence for a 4-week period. |
| End of July (tbc) | Report on Submissions / Observations for second public display – Circulated to Councillors |
| End of October (tbc) | Special Council Meeting will take place to adopt the plan |

Part 2: Summary of Submissions by The Eastern Midlands Regional Assembly, The National Transport Authority and the Office of the Planning Regulator, and the Chief Executive's Opinion & Recommendations

Submission: Eastern and Midland Regional Assembly

Submission No: 1029

Summary of the Observations, Submissions and Recommendations of the Eastern Midlands Regional Assembly

Introduction

Under Section 12 (4) of the Planning and Development Act 2000, as amended, the Chief Executive's Report must summarise the issues and recommendations raised by the Eastern and Midland Regional Assembly, and outline the recommendations of the Chief Executive in relation to the manner in which those issues and recommendations should be addressed in the Development Plan.

The submission of the Assembly has been reviewed and the Chief Executive sets out below a summary of the substantive issues raised followed by the response and recommendation of the Chief Executive. For ease of reference, the same heading structure set out in the submission is used.

Regional Spatial and Economic Strategy

The Assembly welcomes the publication of the Draft Plan which enables the co-ordinated and timely incorporation of Project Ireland 2040, the NPF and the RSES. The extensive work in preparing the Plan is acknowledged.

Strategic Context and Vision

Summary

It is considered by the Assembly that section 1.4 of the Plan could be strengthened through emphasising the legislative context and planning policy hierarchy with which the City Development Plan is required to be consistent with, including the RSES for the Eastern and Midland Region.

Chief Executive's Response

Section 1.9 of the Draft Plan contains a comprehensive summary of relevant national and regional policy provisions. Section 1.9.5 specifically addresses the Regional Spatial and Economic Strategy (2019-2031) and section 1.9.6, the Dublin Metropolitan Area Strategic Plan. However, section 1.4 can be updated to make a more explicit reference to the RSES.

Chief Executive's Recommendation

Chapter 1

Section: 1.4 Statutory Context

Page: 29

Amendment:

The plan is required to be consistent with national and regional planning and development {policy including the National Planning Framework and the Regional Spatial and Economic Strategy for the Eastern and Midland Region}. ~~(and development policy and)~~ {The Plan} must specifically address the following mandatory requirements:

Core Strategy

Summary

The Assembly welcome the inclusion of the chapter. A correction is requested to section 2.2 to refer to the Assembly rather than Authority. The inclusion of Table 2.6 is welcomed and considered consistent with the RSES and NPF. The Assembly also welcomes the application of the methodology outlined in the Housing Supply Target Methodology for Development Planning Guidelines, together with the approach to land capacity and the targeted approach to the SDRA's. It is considered that the exceedance rate of 20% accords with the guidance set out in the Draft Development Plan Guidelines. The HNDA is welcomed by the Assembly.

It is recommended by the Assembly that a tiered Approach to Zoning is provided in the Plan in line with the requirements of NPOs 72a, b and c of the NPF, for all of the targeted development lands identified as part of the Draft Plan. It is detailed that this tiered approach should differentiate between zoned land that is serviced and zoned land that is serviceable within the life of the Plan and detail an estimate of the full cost of delivery of the specified services. The Assembly considers that this tiered approach will facilitate the prioritisation of development lands within the Local Authority.

It is recommended that a core strategy table is included in accordance with the requirements set out in section 1.3.2 of the Draft Development Plan Guidelines in order to identify and provide robust estimates for areas identified for growth within the city and to make estimates for residual infill development. It is also considered that reference to densities should be made.

It is also considered by the Assembly that overarching policies should be provided to ensure that future development within the city is consistent with the provisions of the Core Strategy and aligned with the NPF and the RSES and also that there should be a policy committed to monitoring the progress and implementation of the Core Strategy.

Chief Executive's Response

The comments of the Assembly regarding the tiered approach to zoning are noted. As highlighted in the Draft Plan, all lands within the city area are serviced and whilst some capacity upgrades are likely to be required in order to service some sites, this is likely to be at a site specific rather than a strategic level. The infrastructure capacity assessment, Appendix 10, provides a full assessment of the larger scale infrastructure requirements for the city. As noted in the response to the OPR, it is proposed to include a table in Chapter 13 which set outs broadly the relevant supporting infrastructure for each SDRA. See response to OPR for further detail.

The two main areas where significant infrastructural upgrade is likely to be required are the Naas Road and Glasnevin Industrial Estate. These lands do not form part of the Core Strategy. Both areas have been identified as priority areas for the preparation of a statutory plan. It is considered that the matter of infrastructural investment and the cost of delivery of specified services will be addressed at LAP stage. The comments of the Assembly that the tiered approach to zoning will facilitate the prioritisation of development lands within the Local Authority

are noted. However, the CE is of the view that as Dublin City is located at the apex of the settlement hierarchy nationally, it is not considered appropriate or necessary to prioritise development. It is considered that such an approach would be contrary to the broader objectives of the NPF to promote compact growth and particularly NPO 3 a, b, and c.

With regard to the preparation of a core strategy table, this matter has been comprehensively addressed in the OPR response. It is proposed to include a core strategy table in Chapter 2 which will address the issues raised by the Assembly.

Whilst the comments of the Assembly regarding additional policies regarding compliance with the Core Strategy and monitoring of its implementation are noted, it is not considered necessary to provide additional policy provisions in this regard. Chapter 2 is comprehensive and will include a new core strategy table which will clearly demonstrate the alignment between the priority growth areas and national and regional policy including MASP. Furthermore, there is a detailed chapter (Chapter 16 Monitoring and Implementation) which provides clear performance indicators and a commitment to prepare a Development Plan Core Strategy Monitoring Report on the City Performance Indicators.

Chief Executive's Recommendation

Chapter: 2

Section: 2.2 Quantitative Data Underpinning the Core Strategy

Page: 55

Amendment:

Eastern Midland and Regional **{Assembly}** (**Authority**): Population Allocation for Dublin City Council (July 2020);

Climate Action

The inclusion of a dedicated Climate Action Chapter is welcomed by the Assembly. It is requested that all references should be updated to reflect the new Climate Action Plan 2021 (CAP 21) and the associated annex of actions should be reviewed as they relate to local authorities and sectoral emissions reduction targets. It is also detailed that the final Plan should make reference to the actions proposed under the CAP including those related to Local Authority Renewable Energy Strategies and the upcoming revised Wind Energy Guidelines due for publication in 2023.

The policies regarding district heating and the identification of a Decarbonisation Zone at Ringsend/Irishtown are welcomed. The Assembly also welcomes the approach to sustainable transport and modal share as well as the approach to flood and water resource resilience and natural flood risk mitigation through the use of Green Infrastructure and nature-based solutions.

It is recommended that consideration is given to the inclusion of additional detail outlining how Dublin City will contribute to the reduction of emissions and the renewable energy targets as outlined in CAP 2021, in accordance with the relevant section 28 guidelines including the Wind Energy Development Guidelines (2006) and the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (2017).

It is suggested that the plan would benefit from reference to the potential opportunities of the bioeconomy as supported by RPO7.34 of the RSES.

Chief Executive's Response

All relevant references to the Climate Action Plan 2021 are recommended for updating in the Draft Plan – see response to the OPR submission.

The comments of the Assembly regarding the inclusion of additional detail on how Dublin City will contribute to the reduction of emissions and renewable energy targets are noted. The CE considers that the Plan contains a comprehensive suite of measures, policies and objectives aimed at reducing emissions in the city, particularly the policies with respect to district heating – CA14 to CA17 (page 108 – 109) and transition to sustainable travel modes – policy SMT01, page 279. It is a specific objective under policy CA9, page 104, to prepare a climate action statement for significant developments to demonstrate how low carbon energy and heating solutions, have been considered as part of the overall design and planning of the proposed development. The potential for renewable energy is addressed on page 104-106 of the Plan with policy provisions set out under CA10 to CA13. It is noted that new wind energy guidelines are due to be published in 2023. However, the guidelines will be considered further by the Planning Authority on their publication and the plan updated as necessary.

The CE notes RPO7.34 which supports the National Policy on Bioeconomy and the CE recommends that the Draft Plan is updated to make reference to same.

Chief Executive's Recommendation

Chapter: 9

Section: 9.5.5 Waste Management and Circular Economy Practice

Page: 331, SI27

Amendment:

Policy SI27 Sustainable Waste Management

To support the principles of the circular economy, good waste management and the implementation of best practice in relation to waste management in order for Dublin City and the Region to become self-sufficient in terms of resource and waste management and to provide a waste management infrastructure that supports this objective. **To support opportunities in the circular resource efficient economy in accordance with the National Policy Statement on Bioeconomy (2018).}**

Shape and Structure of the City

The Assembly welcomes the inclusion of this Chapter which sets out the overarching framework and strategy to guide the future sustainable development of the city. It is considered that the strategic approach of the chapter is in keeping with policy within the RSES and Dublin MASP. The Assembly note that the inclusion of Sections 4.5.3 and 4.5.4 of the Draft Plan, which detail density and building heights respectively, are important inclusions within the Plan. The Assembly welcomes the approach which they consider seeks to ensure consistency with the relevant Planning Guidelines and deliver on key national and regional concepts such as compact growth, whilst recognising the appropriateness of the context and the diverse character of the city.

Chief Executive's Response

The comments of the Assembly are noted and welcomed.

Chief Executive's Recommendation

No change is recommended.

Quality Housing and Sustainable Neighbourhoods

The Quality Housing and Sustainable Neighbourhoods Chapter 5 presented as part of the Draft Plan is welcomed by the Assembly and in particular that the Chapter is framed within the context of overarching national and regional policy. The policy approach to compact growth, healthy placemaking and the 15-minute city are also welcomed.

It is recommended that Dublin City Council give consideration to the inclusion, within volume 1, of a clearly presented summary of the entire housing need in Dublin City, which includes the housing need broken down across tenures, what is required in terms of new housing supply and why this is the case, including social and affordable needs, housing types and sizes.

It is considered that the Draft Plan could be strengthened through the inclusion of an evidence-based rationale for determining the location of build to rent schemes within the Ccty.

Chief Executive's Response

The comments of the Assembly are noted and welcomed.

It is considered that the Housing Strategy and HNDA set out in Appendix 1 of the Plan sets out a clear summary of the housing need in the city including the HNDA estimated Housing Need by Tenure 2023-2028 in Table 3.7. It is considered that to reiterate this information on Volume 1 of the plan would lead to unnecessary duplication and repetition. However, the comments of EMRA regarding greater clarity are agreed. In this regard, the CE recommends additional text to be added to paragraph 2.3.3 of Chapter 2 Core Strategy.

The CE response to issues raised with respect to BTR and an evidenced based rationale for the location of BTR schemes is comprehensively addressed in the response to the submission by the OPR.

Chief Executive's Recommendation

Chapter 2

Section: 2.3.3 Housing Strategy and HNDA – subsection Housing Strategy

Page: 68

Add additional paragraph at end of sub section on page 68

{The conclusion of the HNDA and Housing Strategy is that there is a requirement for the full 20% complement of social housing to be provided under the provisions of Part V. The HNDA modelling indicates that over the six-year plan period of 2023-2028, there is an estimated need for 10,247 social homes in Dublin City as well as 7,887 affordable homes; 4,997 households are estimated to be able to access private ownership in Dublin City, while 4,088 households are estimated to be able to meet their needs in the private rental market.}

City Economy and Enterprise

The Assembly welcomes the overarching policy approach in this chapter and considers the reference to the Local Economic and Community Plan a positive inclusion. The submission is supportive of Table 6.1 which supports the Strategic Employment Development Areas. The Assembly also welcome the breadth of section 6.5.6 of the Plan regarding key economic sectors.

It is considered that policy CEE7 of the Draft Plan is in keeping with RPO 5.6 of the RSES which states that the development of future employment lands in the Dublin Metropolitan Area shall follow a sequential approach, with a focus on the re-intensification of employment lands within the M50 and at selected strategic development areas and provision of appropriate employment densities in tandem with the provision of high-quality public transport corridors. The submission notes that updating of the Core Strategy in accordance with the recommendations contained at Section 2.6 of the submission would further reinforce and ensure consistency with the RSES.

Chief Executive's Response

The comments of the Assembly are noted and welcomed. It is proposed to include a core strategy table in Chapter 2 to address the issues raised.

Chief Executive's Recommendation

To include Core Strategy Table in Chapter 2 as per CE's response to OPR (see above).

The City Centre, Urban Villages and Retail

It is considered by the Assembly that the retail hierarchy is in accordance with the RSES and the detailed strategy to support the city centre as set out in section 8 of the Retail Strategy is welcomed particularly policies to diversify the city centre offer, markets, night time economy and the public realm. The submission also welcomes measures to improve accessibility and permeability and to facilitate co working in KUV's.

Chief Executive's Response

The comments of the Assembly are noted and welcomed.

Chief Executive's Recommendation

No change is recommended.

Sustainable Movement and Transport

The Assembly welcome the policy approach in the Plan. It is considered that Policy SMT20 should reference support of the bus and rail projects in accordance with the review of the NTA's Transport Strategy for the GDA (for policy consistency as per Policy SMT28 Road Projects).

The Council is directed to RPO 8.11 which supports the improvement, protection and strategic function of the Dublin-Belfast Corridor as part of the EU TEN-T network. It is recommended that a complementary policy for the Dublin-Belfast Corridor and recognition of the strategic function of the Dublin to Belfast road network be included in this chapter which supports and cross references Policy CEE5 as provided in Chapter 2 in the Draft Plan.

The Council is directed to RPO 8.14 and Table 8.5 of the RSES that supports delivery of strategic park and ride projects which include Finglas and Naas Road, and other locations under review by the NTA as part of the review of the National Transport Strategy for the GDA. The Council is directed to Action 260 of the CAP 21 which proposes implementation of the NTA's Park and Ride Strategy for the GDA in Q1 2022 which should further inform decision making in this area.

The Assembly welcomes the proactive approach and progress that has been made by the Council in improving walking and cycling infrastructure in the city as part of the accelerated measures in response to the COVID-19 pandemic. The continuation of this approach is welcomed, as set out in Policy SMT07 that proposes to review the temporary pedestrian and cycling measures with a view to permanent implementation. These measures should include provision for older people, people with disabilities and young children in line with the principles of universal design and incorporate monitoring measures to inform the implementation of permanent solutions where clear benefits are identified. Policy SMT11 is noted in this regard that aims to enhance the attractiveness and liveability of the city through the continued reallocation of space to pedestrians and public realm. The Council is also directed to Action 231 of CAP 21 which requires each local authority to assess their road network and identify where additional space can be reallocated to pedestrians and cyclists to continue the improvement and expansion of the active travel and greenway network.

Chief Executive's Response

The comments of the Assembly are noted and welcomed.

The comments regarding Policy SMT20 are noted and it will be updated to provide reference for support of the bus and rail projects in accordance with the review of the NTA's Transport Strategy for the GDA. Please see response to the OPR for further detail.

The CE recommends that an additional policy will be added to Chapter 8 to recognise the strategic function of the Dublin to Belfast road network.

The CE recommends that Objective SMT015 is updated to make reference to the NTA's Park and Ride Strategy for the GDA.

The CE welcomes the support of the Assembly of the accelerated walking and cycling measures implemented as a response to the COVID-19 pandemic. Universal design will be considered in any permanent implementation of these measures. The plan contains a suite of policies to support universal design in the public realm including QHSN11, QHSN15, CCUV38, GI14 and section 15.4.4.

The comments regarding the identification of additional space to be reallocated to pedestrians and cyclists are noted. The Draft Plan under policy SMT11 supports the continued reallocation of space to pedestrians and the public realm to provide a safe and comfortable street environment for all ages and abilities. The Draft Plan also includes a range of policies (section 8.5.6) to support active travel and to work with relevant transport providers and agencies to facilitate the integration of active travel measures in the City. It is an objective under SMT05 to review the City Centre Transport Study 2016 over the life of the plan and this issue will be examined further through this study.

Chief Executive's Recommendation

Chapter 8

Section 8.5.9 Street/Road, Bridge and Tunnel Infrastructure,

Page: 300

Amendment:

Insert new policy after policy SMT29. Subsequent policy numbering to be amended accordingly.

{Policy SMT30 Dublin – Belfast Economic Corridor

To support the improvement, and protection, of the EU TEN-T network and the strategic function of the Dublin to Belfast road network.}

Chapter 8

Section: 8.5.6 Sustainable Modes, subsection Public Transport

Page: 295, Objective SMT015

Amendment:

SMT015 'Park and Ride' Services

To promote 'Park and Ride' services at suitable locations in co-operation with neighbouring local authorities {and to support the implementation of the NTA's Park and Ride Strategy for the Greater Dublin Area}.

Sustainable Environmental Infrastructure and Flood Risk

The Assembly welcomes the policy approach noting in particular the commitment of the Plan to facilitate the timely delivery of strategic public water and wastewater infrastructure projects as well as the commitment to examine the potential for strategic management, restoration and enhancement of the city's watercourses as a policy response to the Water Framework Directive, the Local Government (Water Pollution) Act 1977 (as amended), the River Basin Management Plan and National urban renewal policies. The Assembly also welcome the approach to the circular economy and the implementation of best practice in relation to waste management in the city. The policies in relation to air quality, strategic energy and telecommunications infrastructure and the 'Dig Once' code of practice are all supported. The Council is also directed to the potential and opportunities of the Bioeconomy as supported by RPO 7.34 of the RSES.

In terms of coastal resilience, the attention of the Council is drawn to Integrated Coastal Zone Management (ICZM) supported by RPO 7.3 of the RSES, as a coherent policy for the sustainable management of all aspects of the coastal zone.

Chief Executive's Response

The comments of the Assembly are noted and welcomed. As noted above policy SI27 will be amended to make reference to the bioeconomy. The matter of Coastal Zone management is addressed in the Draft Plan under Policy CA29, page 118.

Chief Executive's Recommendation

Agree as per policy SI27 above.

Green Infrastructure and Recreation

The Assembly welcomes the inclusion of a dedicated Chapter on Green Infrastructure (GI) and Recreation, and the recognition given to GI as a critical enabler in making Dublin a climate resilient, healthy and green city. The Assembly welcomes the strong commitment within the Draft Plan to biodiversity which underpins and is integral to maintaining the integrity of a GI network and the city's resilience to climate change impacts. The Assembly also welcomes the strong policy supports for parks/open spaces, sport, recreation and play set out in the Draft Plan, in addition to the inclusion of Figure 10-5 identifying strategic Public Rights of Way (PROW) in the city. It is noted that many of these PROW incorporate/ will incorporate Metropolitan Greenways thereby promoting and enabling wider regional recreation and tourism objectives and also sustainable travel modes.

Chief Executive's Response

The comments of the Assembly are noted and welcomed.

Chief Executive's Recommendation

No change is recommended.

Built Heritage and Archaeology

The Assembly welcomes the suite of policies and objectives set out in the Draft Plan to enhance, integrate and protect the special physical, social, economic and cultural value of built heritage assets and ensure their preservation into the future. In particular, the Assembly welcomes the policies to support the rehabilitation and reuse of existing older buildings and overall heritage led regeneration in the city and the dedicated section in this chapter on retrofitting, sustainability measures and climate change.

The Council is also directed to the annex of actions in the Climate Action Plan 2021 as they relate to heritage properties, in particular the proposed outputs of Action 205 regarding climate proof planning procedures for heritage properties including upcoming Guidelines on resilience of heritage resources under current climate conditions.

Chief Executive's Response

The comments of the Assembly are noted and welcomed as is the forthcoming publication of guidelines on resilience of heritage resources. Such guidance will be considered at implementation stage of the Plan through the development management process. Retrofitting, Sustainability Measures and Addressing Climate Change are addressed comprehensively in the plan under section 11.5.4 and policies BHA21 to 23, page 416.

Chief Executive's Recommendation

No change is recommended.

Culture

The Assembly welcomes this dedicated chapter to Culture in recognition of the importance of culture as an essential part of place making and in delivering an enhanced quality of life to Dublin City. The Assembly welcomes the attention given to supporting cultural vibrancy within the city through the protection of existing cultural uses and encouragement of new cultural uses.

Chief Executive's Response

The comments of the Assembly are noted and welcomed.

Chief Executive's Recommendation

No change is recommended.

Strategic Development Regeneration Areas

The Council is directed to review consistency with the Guiding Principles set out in the RSES for infill and brownfield development, at Chapter 3 Growth Strategy and Chapter 5 MASP, specifically Section 5.3 which outlines the Guiding Principles for the growth of the Dublin Metropolitan Area.

It is stated in the submission that some of the SDRAs listed in the City Plan are locations identified as Strategic Residential and/or Employment Development Areas in Tables 5.1 and 5.2 of the MASP including the Docklands, Parkwest-Cherry Orchard, Ballymun, St. James, Naas Road, Grangegorman and Clongriffin-Belmayne. The submission notes that the Council should ensure that the development of these lands and any future lands within these areas are consistent with RPOs 5.4, 5.5, and 5.6 of the RSES which support compact sustainable growth, accelerated housing delivery and re-intensification of employment lands in the Dublin Metropolitan Area.

Chief Executive's Response

The comments of the Assembly are noted and welcomed. Many of the issues raised by the Assembly have been addressed in the response to the OPR. The CE recommends a new section in Chapter 13 which sets out explicitly the intrinsic synergy between the SDRAs and the policies and objectives set out in the RSES, MASP and the NPF. Furthermore, the Core Strategy Table recommended for inclusion in Chapter 2 clearly aligns the SDRAs within the settlement hierarchy for the city as set out in MASP. It is considered that the designated SDRAs fully align with the growth strategy set out in Chapter 3 of the RSES and the Guiding Principles for the growth of the Dublin Metropolitan Area set out in Section 5.3 of the strategy.

Chief Executive's Recommendation

No change is recommended.

Other

The Assembly welcomes that the guidance provided in Chapter 15 (Development Standards) has been informed by the NPF and RSES. The submission supports the Thresholds for Planning Applications set out in Table 15.1 as well as guidance on key design principles; notably healthy placemaking, inclusivity and accessibility, green infrastructure, landscaping, climate action, and

the new requirements for Climate Action Energy Statements. The inclusion of a dedicated chapter to monitoring and implementation is welcomed, in particular the commitment to prepare a Development Plan Core Strategy Monitoring Report. The Assembly welcomes the inclusion of such monitoring mechanisms to ensure effective delivery of the City's Development Plan and for greater transparency on the progress made in its implementation.

The attention of the Council is also directed to the development of an emerging Regional Development Monitor by the Regional Assembly, which is aligned to National and Regional Strategic Outcomes in the NPF and RSES, and which may provide additional support in monitoring the delivery of local authority development plans.

Chief Executive's Response

The comments of the Assembly are noted and welcomed. The CE welcomes the emerging work of the Assembly on the Regional Development Monitor which will be fully considered over the implementation of the Plan and in the preparation of the 2-year monitoring report.

Chief Executive's Recommendation

No change is recommended.

SEA, AA and SFRA

The Assembly welcomes the preparation of the Draft Plan in tandem with the required environmental processes, namely Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA).

Environmental baseline and environmental references in the Environmental Report will be updated, where appropriate, to capture new / updated information and references (e.g. urban centres most exposed to economic disruption due to the COVID-19 pandemic, and Economic analysis of co-working spaces to inform targeted supports and investment - to be found at www.emra.ie

Submission: Office of the Planning Regulator

Submission No: 1817

Summary of the Observations, Submissions and Recommendations of the Office of the Planning Regulator

The OPR has evaluated and assessed the Draft Dublin City Development Plan 2022-2028 in accordance with Section 31 (AM) of the Planning and Development Act 2000 (as amended). The Planning Authority is required to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions. Under section 31p (1) (b), the OPR may inform the Minister if, in the opinion of the Office, the Plan is not consistent with its observations and recommendations.

The submission of the OPR has been reviewed and the Chief Executive sets out below a summary of the substantive issues raised followed by the response and recommendation of the Chief Executive. For ease of reference, the same heading structure set out in the submission is used.

Overview

Summary of the OPR Submission

The OPR acknowledges that the Draft Plan has actively embraced many of the challenges and opportunities presented in the NPF, the RSES and Housing for All – A New Housing Plan for Ireland (2021).

The OPR state that full consideration has been given to the Council's observed trends regarding Build to Rent (BTR) schemes and the creation of sustainable communities, and how the broad policy aim of the Council could be served in a manner that is supported by evidence, and consistent with both national policy and the policies of Draft Plan itself. Serious concerns are raised in respect of the proposed Z16 zoning objective.

The OPR also suggest that a clearer vision is required as to how much development is likely to occur in different areas of the city over the Plan period and suggest that this could be addressed by way of a core strategy table. The approach to the SDRA's is noted and it is suggested that the Draft Plan would benefit from setting out specific policies and objectives as to the preferred outcomes of each SDRA. Concerns are raised regarding the extent of LAP's proposed in the Plan.

The OPR welcomes the approach set out in the Draft Plan to address climate change. They strongly commend the approach taken with regard to modal shift targets, basement development, green / blue roofs and surface water management.

The submission also specifically notes the objective to prepare upper floor building re-design guidelines under objective QHSNO6 and considers that this guidance has the potential to provide a template for other urban areas.

The OPR commends the approach to accessibility. Some clarity regarding mapping is sought.

7 recommendations and 3 observations are set out.

Chief Executive's Response

The comments of the OPR are noted. The Chief Executive welcomes the comments of the OPR regarding the content of the Plan and its accessibility for all. The preparation of the Draft Plan posed significant challenges for the City Council having regard the tight timescales imposed by the current legislative provisions relating to the development plan process, the volume of submissions and directions received and the complexity of issues that are required to be addressed in the plan making process.

The significant importance of housing delivery is acknowledged throughout the Plan with a suite of policies and objectives aimed at activating sites and facilitating the ongoing consolidation of the city to create long term sustainable housing and communities in the city.

The comments raised by the OPR with regard to BTR, the Z16 Zoning objective, core strategy table, SDRA's, LAP's and mapping are addressed further below.

Chief Executive's Recommendation

As per response to individual OPR recommendations/observations – see below.

1. Core Strategy and Settlement Strategy

Summary

1.1 Housing and Population Targets

The OPR note general satisfaction with the population projections set out under the Core Strategy and that they are consistent with the RSES and the NPF. They also commend the preparation of HST figures to determine the demand for 40,000 housing units over the Plan period and that the methodology is consistent with the section 28 Housing Supply Target Methodology for Development Planning Guidelines for Planning Authorities (2020).

1.2 Settlement Hierarchy and Distribution of Growth

The OPR acknowledges that the settlement hierarchy prioritises development in the inner city, key urban villages and the SDRA's and that the characteristics of the SDRA's differ significantly, particularly in terms of their housing capacity.

The OPR recommend the inclusion of a core strategy table which would include a broad settlement hierarchy for the city, to provide more clarity regarding the Plan's strategic preferences for development and the portion of the HST future that could realistically be delivered in each KUV and SDRA over the Plan period. It is also a suggestion that the absence such a table may impede monitoring of the Plan. The Office considers that the information provided in section 2.4 of the Draft Plan regarding the settlement hierarchy is too broad.

As such, the OPR sets out the following recommendations:

Recommendation 1 - Core Strategy Table and Settlement Hierarchy

The Planning Authority is required to provide a Core Strategy table in Chapter 2 of the Development Plan which contains:

- (i) the broad settlement hierarchy for the city which clarifies the Draft Plan's strategic preferences for development with a distinction between the city centre area, Strategic Development and Regeneration Areas, Key Urban Villages, and other lands, as relevant;
- (ii) the population and housing allocations for the Plan period for each area in (i) above;
- (iii) the area zoned to accommodate residential development in hectares and estimated housing yield for each area;
- (iv) the densities used in the calculation of housing yield for each area; and
- (v) references to the Strategic Development Areas (Tables 5.1 and 5.2) in the Regional Spatial and Economic Strategy as appropriate.

1.3 Core Strategy and Zoning for Residential Use

The OPR welcomes the capacity assessment set out for housing in each SDRA. They also note satisfaction with the justification provided for the 20% surplus and consider this approach is consistent with the Development Plan Guidelines for Planning Authorities – Draft for Consultation, August 2021.

1.4 Local Area Plans and Masterplans

The OPR raises concerns regarding the extent of requirements for LAPs / masterplans in the Draft Plan and that this has the potential to delay housing delivery in key locations and undermine the Planning Authority's ability to achieve its Housing Supply Target. They state that there is no clear rationale for some of the 18 areas listed for an LAP as many of the areas listed in Table 2-14 do not have substantial redevelopment opportunities and do not form part of a KUV or SDRA, such as Harold's Cross, Donnybrook and Ranelagh.

The OPR also raise concerns that the Draft Plan indicates that a masterplan approach is required for a substantial number of sites within the individual SDRAs, and that policy SC17 specifies the inclusion of a masterplan for any site over 0.5 ha. The Office fears that the extensive requirements for future masterplans in the Draft Plan would be challenging to implement, and should be reviewed to ensure that the requirement for a masterplan is limited to strategic brownfield and infill sites and complex / high profile sites. It is recommended that policy SC17 should be amended to omit the requirement for masterplans on sites over 0.5 hectares. The OPR also state that some of the SDRA sites listed as requiring a masterplan are also subject of a requirement for a future LAP and that the Planning Authority should be cognisant of the implications of SEA and AA.

As such the OPR set out the following recommendation:

Recommendation No. 2

Having regard to the requirement for performance criteria set out NPO 13 of the *National Planning Framework*, the guidance in relation to masterplans / framework plans in the *Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities* (2009), the guiding principles in the *RSES* for strategic brownfield and infill sites, and the need to accelerate housing delivery over the plan period, the Planning Authority is required to:

- (i) review and condense the list of areas proposed for a future local area plans in Table 2-14;
- (ii) review the extent of masterplans required for specific sites within the individual Strategic Development and Regeneration Areas in particular where a Local Area Plan or social housing redevelopment is proposed; and
- (iii) omit the requirement for masterplans on all sites over 0.5 ha in Policy SC17 or replace with appropriate performance-criteria.

The Planning Authority is also advised to provide consistency regarding the requirements for masterplans and the language used throughout the Plan.

Chief Executive Response

The Chief Executive notes and welcomes the comments made by the OPR with regard to the housing and population targets and the capacity assessment set out for housing in each SDRA.

1.2 Settlement Hierarchy and Distribution of Growth

The comments of the OPR regarding a Core Strategy table are noted. The CE recommends the inclusion of such a table in Chapter 2 which accords with the strategic objectives of MASP and

that sets out greater clarity regarding the prime areas zoned to accommodate development and the estimated housing yield for these areas.

1.4 Local Area Plans and Masterplans

Local Area Plans

It is acknowledged that there is an extensive list of LAP's set out in Chapter 2 of the plan, as proposed by the elected members of the Council. It is important to note however, that 3 key priority plans are identified for preparation over the Plan period, each linked to a specific objective under CSO1- CSO3. In this regard, the CE is of the view that the Draft Plan accords with section 2.7 of the *Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities* (2009), which advocates that the programme of delivery of LAPs should be prioritised for those areas with the potential for significant development in the short term.

In relation to the other areas, it is envisaged that an LAP or a non-statutory VIP may be prepared over the life of the Plan subject to resources. The preamble text clearly states that the preparation of these plans will be based on a prioritised selection procedure to be agreed during the implementation phase of the Plan and specific criteria to underpin such an assessment are set out.

Whilst the concerns of the OPR are noted that the extent of LAP's listed has the potential to delay housing in key locations and undermine the ability to achieve the Housing Supply Target, the CE is of the view that the Plan as drafted poses no impediment to the delivery of housing within the Plan area. No development will be considered premature pending the completion of an LAP and will be considered in the context of the wide-ranging policies, objectives and zoning provisions of the Plan. To provide clarity on this, a textual amendment is proposed.

Masterplans

The Planning Authority have had full regard to the *Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities* (2009) and consider that the masterplan approach advocated in the Draft Plan is consistent with the guidelines and an appropriate mechanism to provide detailed design frameworks for larger development sites.

A masterplan is defined under the Draft Plan (see glossary) as a framework to provide area-specific and more detailed design guidance for large-scale mixed-use development, for example, to indicate an overall structure for a new neighbourhood. It is considered an important tool in setting out the detailed design parameters for larger development sites and in particular, complex urban sites. The masterplan requirement is intrinsically interlinked with Appendix 3 - Achieving Sustainable Compact Growth – Policy for Density and Building Height in the City and is identified as a key criterion for assessment. The CE notes that the OPR has raised no specific concerns regarding Appendix 3.

One of the key criteria for assessment of sites where development of increased height and density is proposed is a masterplan (page 228 Volume 2). The Draft Plan advocates a design led approach to density and height and that the masterplan tool should be utilised to provide a clear and coherent vision for such sites setting out detail as to how new buildings, streets, blocks, pedestrian and cycling routes, parks, and publicly accessible and private open spaces will fit within the existing and planned context. The masterplan approach also allows for the early testing of open space quantum's, sunlight, daylight, visual impact and wind effects. The preparation of a masterplan enables the Planning Authority, through the development

management process, to thoroughly assess a proposal and its relationship to its surrounding context.

Policy SC17, therefore, must not be read in isolation, but considered in the context of the wider policy context of the Plan and in particular Appendix 3. It is considered an essential element to assessing proposals for additional height and density under the Plan. A textual amendment is proposed to interlink the masterplan requirement with Appendix 3.

Concern is also raised by the OPR regarding the fact that masterplans are required for a number of sites within the individual SDRA's. In the opinion of the CE, the sites identified for the preparation of a masterplan are appropriate, due to their complex nature.

For each of the SDRA's, guiding principles are set out and indicated on a map. This is a high-level diagram that sets out broad development parameters and an overall strategy for each site in terms of the appropriate form and scale of development, key routes, permeability, open space etc. It is clearly stated that guiding principles are not intended to be prescriptive and that deviations from the map can be acceptable.

It is in this context, that it is considered appropriate that a masterplan would be prepared at application stage, particularly for some of the more complex SDRA sites. It is envisaged that the masterplan would set out a more detailed framework for the site based on the overarching guiding principles to demonstrate how a coherent and consistent development on the site can be achieved and how any minor deviations have been addressed. It is considered, therefore, to be an important tool to ensure robust planning applications.

The concerns of the OPR regarding SEA/AA are noted, however, any masterplan would have to be generally consistent with the guiding principles of the Plan, which in its own right, is subject to a detailed SEA and AA. Furthermore, at application stage, all development proposals would have to be screened for AA and EIA.

The OPR states that some sites requiring masterplans within the individual SDRA's appear to be subject to a requirement for a future LAP. Two SDRA sites have been identified for priority LAP's – NEIC and Naas Road lands and one area is identified in the 'Other LAP' list – The Liberties. There is likely to be a time lag between the adoption of the final city plan and the preparation of a draft LAP for these areas. The CE is of the view, therefore, that it is important, that pending the preparation of any such Draft Plan, that an applicant should be required to prepare a masterplan for larger development sites within these areas to show how it accords with the broader guiding principles of the area.

Having regard to the foregoing, the CE is of the view that it is not appropriate to remove the requirement for a masterplan from the Draft Plan and omit policy SC17. However, the threshold will be amended to 1ha in recognition that the 0.5 ha may be onerous in a city context.

The OPR suggestions to provide consistency of language in Chapter 13 is noted and minor corrections will be made to the text to remedy this.

Chief Executive's Recommendation

No change to Plan with respect to housing and population targets or the capacity assessment set out for housing in each SDRA.

1.2 Settlement Hierarchy and Distribution of Growth

Chapter 2

Section: 2.3.1 Land Capacity Assessment, subsection - Capacity of SDRA Lands

Page: 64

Amendment:

The SDRA lands are critical to the core Strategy. All SDRAs (both new and previously identified) have been examined to determine capacity for future housing growth, taking into account sustainable densities and relevant SDZs and LAPs where relevant. {This detailed assessment gave a potential yield from the 17 SDRAs of between 34,750 – 35,950 new dwellings on approximately 358 hectares. (Table 13-1 in Chapter 13 shows a breakdown of these figures by individual SDRA).}

Delete Table 2.8 Capacity of SDRA Designated Lands for Residential Use or a Mixture of Residential and Other Uses, and

Replace with new subheading, text and table to this section, before subheading “Capacity of SDRA Lands.”

{Integration of the Core Strategy and Settlement Hierarchy}

The core strategy is shaped and driven by the overall vision outlined in the settlement strategy, with significant new housing delivery framed within the overall settlement hierarchy for the City targeted at (1) the inner city; (2) along key high quality transport corridors as set out by the RSES and MASP and within Key Urban Villages and (3) on key brownfield and infill opportunity sites with the Tier 1 RSES area (which encompasses the entire Council area) to support NPO3a, b and c and NPO11. The settlement strategy recognises there is strong overlap between these categories within the hierarchy with many key SDRA sites fitting within two or three elements.

Table 2.8 - Core Strategy and Settlement Hierarchy

| <u>Settlement hierarchy</u> | <u>Relevant SDRAs/Strategic Lands</u> | <u>Character and general density applied*</u> | <u>Proposed Zoned Area</u> | <u>Proposed Residential Yield</u> | <u>Estimated population</u> |
|-----------------------------|---|---|----------------------------|-----------------------------------|-----------------------------|
| <u>Inner City</u> | | | | | |
| <u>City Core</u> | <u>Docklands (SDRA 6 and KUV)</u> | <u>Mixed use</u> | <u>24</u> | <u>7,900</u> | <u>15,800</u> |
| | <u>Dolphin House (SDRA 12)</u> | <u>Residential</u> | <u>6</u> | <u>350</u> | <u>700</u> |
| | <u>Grangegorman/Broadstone (SDRA 8)</u> | <u>Primarily education/health</u> | <u>10</u> | <u>800**</u> | <u>1,500</u> |
| | <u>Heuston and Environs (SDRA 7)</u> | <u>Mixed use</u> | <u>14</u> | <u>1250</u> | <u>2,500</u> |
| | <u>Liberties & Newmarket Square (SDRA 15)</u> | <u>Mixed use</u> | <u>30</u> | <u>2500</u> | <u>5,000</u> |
| | <u>Markets Area and Environs (SDRA 13)</u> | <u>Mixed use</u> | <u>8</u> | <u>400</u> | <u>800</u> |
| | <u>North East Inner City (SDRA 10)</u> | <u>Mixed use</u> | <u>12</u> | <u>850</u> | <u>1,700</u> |

| | | | | | |
|-------------------------------|--|-----------------------------------|------------|--------------------|---------------|
| | <u>St. Teresa's Gardens (SDRA 11)</u> | <u>Residential and open space</u> | <u>13</u> | <u>950</u> | <u>1,900</u> |
| | <u>Other KUVs- Phibsborough</u> | | | | |
| MASP Corridors | | | | | |
| <u>North East Corridor</u> | <u>Clongiffin/Belmayne (SDRA 1 and KUV)</u> | <u>Mixed use</u> | <u>52</u> | <u>6,950-7,350</u> | <u>14,700</u> |
| | <u>Oscar Traynor Road (SDRA 16)</u> | <u>Residential and open space</u> | <u>17</u> | <u>850</u> | <u>1,700</u> |
| | <u>Other KUVs- Santry (Omni), Northside, Donaghmede</u> | <u>Mixed use</u> | | | |
| <u>North West Corridor</u> | <u>Ballymun (SDRA 2 and KUV)</u> | <u>Primarily residential</u> | <u>35</u> | <u>2,200-2,350</u> | <u>4,700</u> |
| | <u>Finglas Village Environs and Jamestown (SDRA 3 and KUV)</u> | <u>Mixed use</u> | <u>52</u> | <u>2,800</u> | <u>5,600</u> |
| | <u>Glasnevin***</u> | <u>Mixed use regen</u> | <u>-</u> | <u>-</u> | |
| <u>South West Corridor</u> | <u>City Edge/Inchicore lands***</u> | <u>Mixed use regen</u> | <u>-</u> | <u>-</u> | |
| | <u>Emmett Road (SDRA 9)</u> | <u>Primarily residential</u> | <u>15</u> | <u>1,050</u> | <u>2,100</u> |
| | <u>Naas Road (SDRA 5 and KUV)</u> | <u>Mixed use</u> | <u>18</u> | <u>3,300</u> | <u>6,600</u> |
| | <u>Park West and Cherry Orchard (SDRA 4)</u> | <u>Residential and open space</u> | <u>49</u> | <u>2,500-3,100</u> | <u>6,200</u> |
| | <u>Other KUVs- Ballyfermot, Crumlin</u> | <u>Mixed use</u> | | | |
| <u>South East Corridor</u> | <u>Other KUVs- Rathmines</u> | <u>Mixed use</u> | | | |
| Urban Consolidation | | | | | |
| <u>City centre within M50</u> | <u>Infill/smaller scale Brownfield and opportunity sites</u> | <u>Primarily residential</u> | <u>189</u> | <u>13,000</u> | <u>23,400</u> |
| <u>TOTAL</u> | | | <u>544</u> | <u>48,800</u> | <u>88,800</u> |

*Densities from extant LAPs/SDZs/existing permissions are included; over and above that, potential yields outside of these areas are estimated using standard densities of 200 units per hectare (uph) for inner city areas and 100 uph for areas in the suburbs, where sites are primarily residential. For mixed use zonings the figures are reduced to take account of the impact of other non-residential developments.

**Refers to primarily student and supported residential accommodation. KUVs outside of SDRAs present opportunities for some densification and infill, however the housing yield this is not quantified due to the highly speculative and underdetermined nature of such estimation.}

*** these lands are not yet zoned for residential purposes but it is anticipated that they will, through the variation process, come forward for first phase of development during the lifetime of the Plan.}

Amendments:

Add new text after paragraph 1

{Dublin City Council has a unique position in relation to applying the RSES Settlement Hierarchy in that the entire area of the Council falls within Tier 1.}

Add new text to end of paragraph 2

{Table 2-8 in Section 2.4 below contains the Core Strategy for the city, incorporating the settlement hierarchy for the city as thus outlined.}

Move Section 2.4: Settlement Strategy to page 62 so it is now Section 2.3 Settlement Strategy. Subsequent heading numbering 2.5 to be amended accordingly.

1.4 Local Area Plans and Masterplans

Local Area Plans

Chapter 2

Section: 2.7.1, subheading - Other Local Area Plans/ Village Improvement Plans (VIPs)

Page: 76

Amendment:

In addition to the above priority list of LAPs to be progressed over the development plan period, it is proposed to prepare a number of other Local Area Plans and/or Village Improvement Plans (VIPs) as set out in Table 2-14 below, subject to resources. **{It should be noted that in the absence of an LAP, developments will be considered through the development management process in accordance with the policies and objectives of the Development Plan.}**

Masterplans

Chapter 4

Section: 4.5.4 Increased Height as part of the Urban Form and Spatial Structure of Dublin, subheading Landmark/Tall Buildings

Page: 149, Policy SC17

SC17 Building Height

To protect and enhance the skyline of the city, and to ensure that all proposals with enhanced scale and height:

- follow a design led approach;
- include a masterplan for any site over **{1ha} (0.5ha) {(in accordance with the criteria for assessment set out in Appendix 3)}**;
- make a positive contribution to the urban character of the city and that responds positively to the existing or emerging context;
- deliver vibrant and equitable neighbourhoods that are walkable, compact, green, accessible, mixed and balanced; **(and)**
- **{Do not affect the safety of aircraft operations at Dublin Airport (including craneage); and}**
- have regard to the performance-based criteria set out in Appendix 3.

Chapter 4

Section: 4.5.4, subheading Landmark/Tall Buildings

Page: 146

Amendment:

It is a requirement that a masterplan will be prepared for any site greater than **{1ha} (0.5ha)** to allow for the early testing of appropriate open space, sunlight, daylight, visual impacts wind effect etc. and that this is used to inform design development.

Chapter 14
Section: 14.1 Introduction
Page: 605

Amendment:

Changes to the Z10 (Inner Suburban and Inner City Sustainable Mixed Uses) zoning objective include the application of a new requirement that a Masterplan be prepared in respect of the development of Z10 lands in certain locations together with those over 1ha (0.5ha) in size.

Chapter 14
Section: 14.7.10 Inner Suburban and Inner City Sustainable Mixed-Uses – Zone Z10
Page: 623

Amendment:

There will be a requirement that for any significant scheme (on Z10 zoned lands greater than 1ha (0.5ha) in size) seeking to increase densities and/or height, that a masterplan is prepared (see also Appendix 3).

Appendix 3 Volume 2
Section: 4.1 Introduction, subheading masterplan
Page: 228

Amendment:

There will be a requirement that for any significant scheme (on sites greater than 1ha (0.5ha)) seeking to increase densities and height that a masterplan is prepared.

Chapter 13
Section: 4 – Bluebell Avenue
Page: 505

Amendment:

It is considered that the two parcels of land, located on the northern and southern side of Bluebell Avenue, have the potential to deliver a mixed-use development and that this {shall} ~~(should)~~ be the subject of a masterplanning process. The development of the northern portion of the site shall include an adequate setback from the Grand Canal and take account of the conservation zoning.

Chapter 13
Section: 6 – North Strand Fire Station/Former Readymix Site
Page: 518

Amendment:

All dwellings at ground floor level should have own-door access. Given the scale of this site, ~~(it is appropriate that)~~ a masterplan {shall} be prepared for the entire area to address the above matters in addition to planned phasing.

Chapter 13
Section: 8 –Chadwick’s Yard
Page: 519

Amendment:

Given the scale of this site, ~~(it is appropriate that)~~ a masterplan {shall} be prepared for the entire area, to address the above matters in addition to planned phasing.

Chapter 13
Section: 9 - East Road
Page: 519

Amendment:

Given the scale of this site, ~~(it is appropriate that)~~ a masterplan {shall} be prepared for the entire area, to address the above matters in addition to planned phasing.

Chapter 13
Section: 10 – Castleforbes Business Park
Page: 520

Amendment:

Given the scale of this site, ~~(it is appropriate that)~~ a masterplan {shall} be prepared for the entire area, to address the above matters in addition to planned phasing.

Chapter 13
Section: 12 – ESB Complex, South Lotts Road
Page: 521
Amendment:

Given the scale of this site, ~~(it is appropriate that)~~ a masterplan {shall} be prepared for the entire area, to address the above matters in addition to planned phasing.

Chapter 13
Section: 3 – Heuston
Page: 528

Amendment:

Given the scale of the site and its redevelopment potential, it is appropriate that in advance of any development proposal, a masterplan {shall} be prepared and agreed, taking into consideration the wider area, and planned phasing.

Chapter 13
Section: 3 – Heuston
Page: 529

Amendment:

A greening and open space masterplan {shall} ~~{should}~~ also be provided identifying a network of public open spaces including civic squares and parks, throughout the Heuston lands, that are attractive, multifunctional, safe, welcoming and accessible to the wider public.

Chapter 13
Section: 1 – Goldenbridge Industrial Estate
Page: 538

Amendment:

The potential for its renaturalisation {shall} ~~{should}~~ be investigated further via a masterplan process in tandem with the River Camac Restoration Project. Refer to Policy SI11 and SI12 for further details.

Chapter 13
Section: 1 – O’Connell Street to Moore Lane incorporating Carlton Site
Page: 550

Amendment:

Scheme design {shall} ~~{should}~~ be based on a comprehensive masterplan that incorporates a convenient access route to the planned Metrolink stop, quality connections across the site, and a cultural interpretative element.

Chapter 13
Section: 3 – Russell St/North Circular Road
Page: 552

Amendment:

A masterplan ~~{shall}~~ ~~(will)~~ be ~~{prepared}~~ ~~(required)~~ in relation to proposals on this site, addressing stated requirements and setting out planned phasing.

Chapter 13

Section: 5 – Digital Hub

Page: 587

Amendment:

Given the scale of this landholding, ~~(it is appropriate that)~~ a masterplan ~~{shall be}~~ prepared for the entire area, to address the above matters in addition to planned phasing. Any masterplan should also provide for the delivery of enterprise and employment uses in this area.

Chapter 13

Section: 9 – Guinness Lands

Page: 590

Amendment:

Given the scale of these two sites, it is appropriate that in advance of any development proposal, a masterplan ~~{shall be prepared}~~ ~~(and be prepared and agreed for the respective site)~~, taking into consideration the wider area, to address the above matters in addition to planned phasing.

2. Sustainable Development

Summary

2.1 Development Approach for Strategic Development Regeneration Areas

The OPR considers that the alignment of Chapter 13 with the NPF and RSES could be improved to provide a more cohesive and robust policy framework. As such, the following recommendation is set out:

Recommendation 3 - Alignment of Strategic Development & Regeneration Areas with the NPF and RSES

The Planning Authority is required to improve the alignment between the aforementioned and Chapter 13 (Strategic Development and Regeneration Areas) in respect of the following matters:

- (i) The NSOs of the NPF and in particular NSO 10 in respect of Grangegorman and the new National Children's Hospital;
- (ii) The NPOs in the NPF such as in respect of compact growth (NPO 3c); developing cities of sufficient scale to compete internationally (NPO 5); regeneration and rejuvenation (NPO 6);
- (iii) The key future growth enablers for Dublin City in the NPF which refer to, amongst others, progressing sustainable development at Clongriffin; facilitating the growth of Dublin Port with improved access; relocating less intensive uses outside the M50; and delivering Metro Link;
- (iv) The relevant Strategic Development Areas in Table 5.1 of the RSES (Docklands, City Centre social housing regeneration areas, the Naas Road and North Fringe) and RPO 5.4 – MASP Housing and Regeneration; and
- (v) The relevant Strategic Employment Areas in Table 5.2 of the RSES (Docklands, Poolbeg and North East Inner City, Grangegorman / St. James – Diageo, and Naas Road) and RPO 5.6 – MASP Employment Lands.

The OPR also consider that Chapter 13 could benefit from further refinement in order to provide a clear strategy to guide future development within the SDRAs.

In addition, under Observation 1 in relation to the contents of SDRA's, the following comments are made:

Observation 1 – Contents in Strategic Development & Regeneration Area

The Planning Authority is requested to restructure and supplement the SDRA sections in Chapter 13 in respect of the following matters:

- (i) Consider including a policy statement or policies supported by objectives which complement the guiding principles and more clearly sets out the vision and anticipated outcomes for each SDRA;
- (ii) Cross reference and expand on the information contained on each SDRA in the Core Strategy (Chapter 2) in particular Table 2-8 regarding the size of the SDRA, its Housing Supply Target allocation, anticipated yield and housing density (as relevant); and

(iii) Review the Infrastructure Capacity Assessment to include details of the enabling infrastructure requirements for relevant SDRAs, such as the mechanisms for delivery and how the timing for delivery might influence phasing over the plan period.

Mapping

Suggested improvements to the SDRA maps are also suggested and these are addressed in the CE's response below.

2.2 Residential Land Use Zoning – Z16

The OPR strongly questions the rationale for the proposed Z16 zoning. They note that the purpose of land use zoning is to identify land within a plan area for particular use types and the best locations for land uses. They also state that the land use zoning objective for a particular area must have a clear rationale that provides a degree of certainty and clarity to the community, landowners, developers and investors regarding future development. The OPR state that the statutory provisions regarding social and affordable housing are set out in Part V of the Planning and Development Act 2000 and that the proposed objective is, therefore, not consistent with the Planning and Development Act 2000 as amended.

Accordingly, recommendation 4 states:

Recommendation 4 - Z16 Land Use Zoning

Having regard to the provisions of Section 10(2)(a), and of Part V, of *Planning and Development Act 2000*, as amended, the Planning Authority is required to remove the Z16 land use zoning objective from the Plan.

Chief Executive's Response

2.1 Development Approach for Strategic Development Regeneration Areas

Recommendation 3 - Alignment of Strategic Development & Regeneration Areas with the NPF and RSES

The CE notes the comments of the OPR regarding the alignment of the SDRA areas with the NPF and the RSES. The SDRA's are considered a key mechanism to deliver the housing targets set out under the Core Strategy in Chapter 2. It is considered that the relevant policy context of both the NPF and the RSES are clearly set out in both Chapter 1 and 2 of the Plan. However, to accord with the recommendations of the OPR, additional explanatory text will be added to Chapter 13 to clearly explain the synergy between the SDRA's and these key national and regional policy documents.

Observation 1 – Contents in Strategic Development & Regeneration Area

The comments of the OPR that consideration should be given to the inclusion of a policy statement or policies supported by objectives which complement the guiding principles for each SDRA are noted.

The CE considers that Chapter 13 sets out a clear vision for each SDRA. Consistent guiding principles and a guiding principles map are provided for each area. The SDRA's emanate from the Core Strategy and the Settlement Strategy set out in paragraphs 2.3 and 2.4 of the Draft

Plan. The CE is of the view that the plan provides sufficient clarity as to the anticipated outcome and pattern of development for each area. The guiding principles are intended to be high level and to act as a flexible framework for the future development of these areas. It is not considered necessary or appropriate to provide prescriptive policies for each SDRA. The OPR will be aware that 17 SDRA's are proposed and it is considered that the addition of 17 additional policies and objectives would add excessive length, to an already detailed and comprehensive document. To address the OPR observation, an overarching objective is proposed in the introduction of the SDRA Chapter 13 to give further weight to the overarching principles applicable to each SDRA.

The comments of the OPR are noted regarding the need to cross reference and expand on the information contained on each SDRA in the Core Strategy (Chapter 2). As noted above, a Core Strategy table is proposed for Chapter 2 and reference to this will be made in Chapter 13.

In relation to the infrastructure capacity assessment, Appendix 10 provides a full assessment of the larger scale infrastructure requirements for the city. As a wholly built-up metropolitan Council area, the risk of capacity constraints is for the most part not specific to particular locations and cannot be applied to particular SDRAs. However, to respond to the observation, it is proposed to include in Chapter 13 a new table of SDRAs (based on the original Table 2-8 in Chapter 2) and include a column that specifies relevant supporting infrastructure for that SDRA. The impact of any possible constraints on phasing and timing is limited; with the few locations detailed in the text of the relevant SDRA.

Mapping

The OPR suggests a number of improvements to the mapping. The CE response is as follows:

- Improved scale and graphical presentation of some of the guiding principles e.g. Figure 13-10 of SDRA 10 (North East Inner City).

It is envisaged that the majority of people will view the final Development Plan on line, where it will be possible to zoom in on the guiding principles' maps. For the final printed version, Figure 13.10 will be spread over two pages at an enlarged scale.

- Alignment of SDRA boundaries in section 13 with the boundaries on Map K, e.g. SDRA 10 (Figure 13-10) and SDRA 13 (Figure 13-13).

A review was undertaken of the alignment of the SDRA boundaries for SDRAs 10, 11 and 13 with the boundaries indicated on Map K, and anomalies have been corrected.

- Alignment of the Key Urban Village boundary in SDRA 5 (Naas Road Lands) with the Key District Centre boundary 10 in the Naas Road Local Area Plan.

The KUV boundary has been omitted from SDRA 5 guiding principles map as it is clearly indicated on Map K.

- Greater clarity regarding the land use zoning objectives for lands included as SDRA's. e.g. LAP boundary for SDRA 4 (Park West/Cherry Orchard) on land use zoning map D; lands zoned as 'white land' on Map D and G and consistency with the LAP.

Zoning Map D and G have been updated to include the boundary of the Park West/Cherry Orchard LAP. All zoning maps have been reviewed to ensure correct LAP boundaries for plans that will still be operational at the time the City Plan is adopted are included.

In relation to white zoned lands, these areas illustrate the Z14 zoning objective “Strategic Development and Regeneration Areas”. The Z14 zoning objective seeks the social, economic and physical development and/or regeneration of an area with mixed use, of which residential would be the predominant use.

Some rezonings were made in the Draft Plan to rationalise the Park West / Cherry Orchard area and ensure consistency with the LAP objectives. The zonings proposed within the SDR area comprise of a range of different land use zonings including Z14 to reflect the existing and proposed land uses identified in the LAP. The land use zonings in the SDR area facilitate the objectives of the LAP and are, therefore, considered consistent in this regard.

- Clarifications, including the new road objective detailed on map D which is not in the LAP but is indicated as a ‘permeability intervention’ on SDR Map (Figure 13.4).

Zoning Map D shows two road objectives for Cherry Orchard (1) linking Cherry Orchard Avenue to Ballyfermot Road, and (2) linking Cherry Orchard Drive over the railway. Both these routes are consistent with the objective set out in the LAP – Figure 43.

The SDR identifies two permeability interventions that correspond with the proposed road objectives. In addition, the SDR shows a greening cycle and pedestrian corridor that corresponds with the pedestrian and cycle route as set out in the LAP linking Le Fanu Park to Gallanstown Water works.

The road objectives for Cherry Orchard are, therefore, consistent between the zoning maps, SDR and LAP.

2.2 Residential Land Use Zoning – Z16

Recommendation 4 - Z16 Land Use Zoning

The CE concurs with the recommendations set out by the OPR regarding the proposed Z16 zoning objective.

Section 10 (2) (a) of the Planning and Development Act 2000 as amended, sets out the specific requirements with regard to zoning and states:

"(a) the zoning of land for the use solely or primarily of particular area for particular purposes (whether residential, commercial, industrial, agricultural, recreational, as open space, or otherwise, or a mixture of these uses) and to such an extent as the proper planning and sustainable development of the area, in the opinion of the Planning Authority, requires the uses to be indicated."

It is clear, therefore, that the purpose of land use zoning is a spatial exercise to set out the appropriateness of a land parcel for a particular land use. It is not the purpose of land use zoning to set out prescribed housing tenure mix/ownership.

Furthermore, with regard to social and affordable housing, the legislative provisions regarding provision of same are set out under Part V of the Planning and Development Act. The Development Plan cannot circumvent national legislation in this regard, to require a higher level of provision of social and affordable housing on privately owned land.

It is also considered that Z16 zoning is inappropriate as it may undermine the broader objectives of the Draft Plan to promote integrated communities with a broad range of tenures and housing mix.

Chief Executive's Recommendation

2.1 Development Approach for Strategic Development Regeneration Areas

Recommendation 3 - Alignment of Strategic Development & Regeneration Areas with the NPF and RSES

Chapter 1

Section 1.9.6 Dublin Metropolitan Area Strategic Plan (MASP)

Page 44

Amendment:

- Naas Road

{These Strategic Development Areas and Strategic Employment Lands are incorporated into the City Development Plan as SDRA's – see chapter 2, Core Strategy and Chapter 13 (SDRA's).}

Chapter 13

Section: Section 13.1

Page: 466

Amendment:

The active land management measures and approach referred to under the core strategy will be pursued in the development and delivery of the SDRA's. {Table 13.1 sets out the 17 SDRA's, their estimated capacity and key supporting infrastructure.}

Delete Table 13.1 and replace with following table:

{Table 13.1: Capacity of SDRA Designated Lands for Residential Use or a Mixture of Residential and Other Uses and Supporting Infrastructure}

| <u>SDRA Ref.</u> | <u>City Area Name</u> | <u>Estimated Capacity</u> | <u>Area (Ha)</u> | <u>Supporting Infrastructure</u> |
|------------------|---|---------------------------|------------------|--|
| <u>SDRA 1</u> | <u>Clongriffin/Belmayne and Environs</u> | <u>6,950 – 7,350</u> | <u>52</u> | <u>DART+, Bus Connects, completion of Main Street, social infrastructure</u> |
| <u>SDRA 2</u> | <u>Ballymun</u> | <u>2,200 – 2,350</u> | <u>35</u> | <u>Metrolink, Bus Connects</u> |
| <u>SDRA 3</u> | <u>Finglas Village Environs and Jamestown Lands</u> | <u>2,800</u> | <u>52</u> | <u>Luas Finglas, Bus Connects, social infrastructure</u> |
| <u>SDRA 4</u> | <u>Park West/Cherry Orchard</u> | <u>2,500 – 3,100</u> | <u>49</u> | <u>DART+, Bus Connects, social infrastructure.</u> |
| <u>SDRA 5</u> | <u>Naas Road</u> | <u>3,300</u> | <u>18</u> | <u>Bus Connects, Luas stop,</u> |

| | | | | |
|----------------|---|----------------------------------|------------|--|
| <u>SDRA 6</u> | <u>Docklands</u> | <u>7,900</u> | <u>24</u> | <u>Water service upgrade</u> <u>DART+,</u> <u>Dodder Bridge, Bus</u> <u>Connects, Luas</u> <u>Poolbeg, District</u> <u>Heating, social</u> <u>infrastructure</u> |
| <u>SDRA 7</u> | <u>Heuston and Environs</u> | <u>1,250</u> | <u>14</u> | <u>DART+,</u> <u>Bus Connects</u> |
| <u>SDRA 8</u> | <u>Grangegorman/Broadstone</u> | <u>900</u> | <u>11</u> | <u>Bus Connects</u> |
| <u>SDRA 9</u> | <u>Emmet Road</u> | <u>1,050</u> | <u>15</u> | <u>Bus Connects, social</u> <u>infrastructure</u> |
| <u>SDRA 10</u> | <u>North East Inner City</u> | <u>850</u> | <u>12</u> | <u>DART+,</u> <u>Bus Connects, social</u> <u>infrastructure</u> |
| <u>SDRA 11</u> | <u>St. Teresa's Gardens</u> | <u>950</u> | <u>13</u> | <u>Bus Connects</u> |
| <u>SDRA 12</u> | <u>Dolphin House</u> | <u>350</u> | <u>6</u> | <u>Bus Connects</u> |
| <u>SDRA 13</u> | <u>Markets Area and Environs</u> | <u>400</u> | <u>8</u> | <u>Public realm</u> |
| <u>SDRA 14</u> | <u>St. James' Medical Campus</u> <u>and Environs</u> | <u>-</u> | <u>-</u> | <u>Bus Connects</u> |
| <u>SDRA 15</u> | <u>Liberties and Newmarket</u> <u>Square</u> | <u>2,500</u> | <u>30</u> | <u>Bus Connects, social</u> <u>infrastructure, public</u> <u>realm</u> |
| <u>SDRA 16</u> | <u>Oscar Traynor Road</u> | <u>850</u> | <u>17</u> | <u>Bus Connects</u> |
| <u>SDRA 17</u> | <u>Werburgh Street</u> | <u>100</u> | <u>2</u> | <u>Public realm</u> |
| | <u>Total</u> | <u>34,750 –</u> <u>35,950</u> | <u>358</u> | |

Chapter 13

Section: After section 13.1

Page: 467

Amendment:

The following text will be added to Chapter 13 after section 13.1 as a new section:

{13.2 Alignment of Strategic Development and Regeneration Areas with the NPF and RSES

As set out in Chapter 1, the Development Plan is informed by a hierarchy of international, national and regional policies. Of particular note, is the National Planning Framework (2018) and the Regional Spatial and Economic Strategy (2019-2031). Chapter 2, the Core Strategy, details how the policies and objectives of these documents will influence the future growth and development of the city. Table 2.8 in Chapter 2 –clearly shows the alignment of the SDRAs with the core strategy and sets out information regarding the area, population and yield of each area.

In terms of the NPF, the SDRAs will play a key role in meeting the National Strategic Objectives, and particularly those of compact growth (NSO 1), sustainable mobility (NSO 4), and the transition to a low carbon and climate resilient society (NSO 8). In accordance with National Policy Objective 3b, the SDRA's are critical to the delivery of the Core Strategy and compliance with the objective that 50% of new homes are within the existing built-up footprint of the city.

The designated SDRA's align with the overarching objectives of the NPF and RSES. They will be drivers of economic growth and investment in the city in line with NPO 5. Their

development is also important in the context of NPO 6, and the vision of the Plan is that the SDRA's will be developed over the Plan period for significant residential and employment uses developed in tandem with high quality social and community infrastructure and amenities, served by excellent public transport.

More specifically the ongoing development of the National Children's Hospital (SDRA 14) and Grangegorman campus (SDRA 8) align with NSO10. The development of Clongriffin (SDRA 1); the development of ambitious largescale regeneration areas; and facilitating the growth and expansion of Dublin Port (SDRA 6) will play a key role in supporting the strategic growth enablers for Dublin City as identified in the NPF.

In terms of the RSES, a number of Residential Strategic Development Areas (SDA's) are identified. Many of the SDRA's identified align with these SDA's and will provide for high quality, higher density residential development in line with RPO 5.4. The RSES also identifies a number of Employment Strategic Development Areas which also align with the SDRA's. The development of these areas will accord with objective RPO 5.6 of the RSES (see also section 1.9.6, Chapter 1). It is envisaged that the relevant SDRA's will be developed for appropriate employment densities in tandem with the provision of high-quality public transport corridors.}

Observation 1 – Contents in Strategic Development & Regeneration Area

New objective to be added to section 13.2 after first paragraph:

Chapter 13
Section: 13.2
Page: 467

Amendment:

Delete section 13.2 and replace with the following text:

{13.2 Overarching Principles and Vision

Objective SDRAO1

It is the objective of Dublin City Council:

To support the ongoing redevelopment and regeneration of the SDRA's in accordance with the guiding principles and associated map; the qualitative and quantitative development management standards set out in Chapter 15; and in line with the following overarching principles:

Architectural Design and Urban Design: All development within the SDRAs must be of the highest architectural quality and adhere to the key architectural and urban design principles set out in Chapter 15 in order to create long term, viable and sustainable communities aligned with the principles of the 15-minute city.

Phasing: Large scale development proposals should be developed in accordance with agreed phasing plans to ensure that adequate social and physical infrastructure is delivered in tandem with development.

Access and Permeability: Development proposals should ensure adequate permeability and connectivity to surrounding neighbourhoods and public transport infrastructure through the provision of high quality, accessible public realm and high-quality walking and cycling infrastructure. Access and layout should accord with the principles of DMURS.

Height: Guiding principles regarding height are set out for each SDR. Where development adjoins lower scaled residential communities, development must be appropriately designed so that no significant adverse impacts on the residential amenities of adjacent residential properties arises. The performance criteria set out in Appendix 3 should be adhered to for developments of significant scale and/or density.

Urban Greening and Biodiversity: Development proposals within the SDR must ensure the integration of greening and biodiversity measures including high quality public open space as well as micro greening measures including green walls, green roofs, parklets etc. In general, unless otherwise specified under a separate LAP/SDZ Planning Scheme/other statutory plan policy/objective or site-specific guiding principle, a minimum of 10% public open space should be provided as part of all development proposals in SDRs. A financial contribution in lieu of same will only be considered in exceptional circumstances.

Surface Water Management: All development proposals should provide for sustainable surface water management and the installation of sustainable drainage systems (SuDS) in order to reduce surface water runoff and potential flooding. This should be considered in conjunction with open space design and greening/biodiversity initiatives. See Appendix 11, 12 and 13 for further detail.

Flood Risk: All development proposals within the SDR's will have regard to restrictions / measures to mitigate identified flood risk outlined in Strategic Flood Risk Assessment and in particular, Appendices A and B.

River Restoration: Opportunities for enhanced river corridors are applicable to the following Strategic Development and Regeneration Areas (SDRs) in order to harness significant opportunities for river restoration where feasible: SDR 1 Clongriffin/Belmayne and Environs; SDR 3 Finglas Village Environs and Jamestown Lands; SDR 4 Park West/Cherry Orchard; SDR 5 Naas Road; SDR 6 Docklands; SDR 7 Heuston and Environs; SDR 9 Emmet Road; SDR 10 North East Inner City and SDR 16 Oscar Traynor Road. See Chapter 9, Policy SI12 for further detail.

Sustainable Energy: Climate Action Energy Statements for significant new residential and commercial developments, in Strategic Development and Regeneration Areas (SDRs), will be required to investigate local heat sources and networks, and, where feasible, to demonstrate that the proposed development will be 'District Heating Enabled' in order to facilitate a connection to an available or developing district heating network. Further specific guidance regarding 'District Heating Enabled' Development is set out in Chapter 15 and should be complied with. Specific guidance is set out regarding SDR 6 (Docklands) and SDR 10 (NEIC) where applicants must demonstrate how a proposed development is District Heating Enabled and will connect to the 'Docklands and Poolbeg' DDHS catchment. Guidance is also set out regarding SDR 7 (Heuston and Environs), SDR 8 (Grangegorman/Broadstone), SDR 11 (St. Teresa's Garden and Environs), SDR 14 (St. James Medical Campus & Environs), SDR 15 (Liberties and Newmarket Square)

where possible connections or interconnections to existing heat networks in the area, to create a district heating ‘node’ must be investigated.

Climate Change: Proposed developments within the SDRAs shall be required to apply innovative approaches to energy efficiency, energy conservation and the use of renewable energy in order to contribute to achieving zero carbon developments.

Cultural Infrastructure: All new regeneration areas (SDRAs) and large-scale developments above 10,000 sq. m. in total area must provide 5% community, arts and culture internal floorspace as part of their development. See policy CUO21, Chapter 12 for further detail.}

Mapping

Mapping amendment:

Map K: correct alignment of SDRAs 10, 11 and 13 boundaries.

Map D and G updated to indicate LAP boundary of Park West/Cherryorchard

Zoning Maps updated to show all LAP and SDZ boundaries.

2.2 Residential Land Use Zoning – Z16

Recommendation 4 - Z16 Land Use Zoning

It is the recommendation of the CE that the following text is deleted.

Chapter 14

Section: 14.7 primary Land use Categories

Page: 609 Table 14.1

Amendment:

~~(Z16 Affordable Housing and Employment)~~

Chapter 14

Section: 14.7.15 Affordable Housing and Employment – Zone Z16

Page: 632

Amendment:

~~(Land-Use Zoning Objective Z16: To seek the social, economic, and physical development and/or rejuvenation of an area with mixed-use, the primary objective of which would be the delivery of affordable housing and employment. The new Z16 zoning would require a master plan for all sites rezoned to Z16. The master plan would be developed in full consultation with DCC, the National Transport Authority, Transport Infrastructure Ireland, the Department of Education and Skills, representative Enterprise and Employment bodies, Irish Water, and the local community. The land uses of the new Z16 zoning would be defined as follows: 30% Employment 10% High Quality Recreational Open Space 10% Community and/or Cultural Amenities 10% Private Residential 40% Social and Affordable residential – to be comprised of a mix of social housing, affordable purchase, affordable rental and senior citizen’s housing with affordability to be defined by the Dublin City Council Housing SPC with the approval of the full council.)~~

3. Housing Strategy and Relevant Policies

Summary

3.1 Build to Rent Accommodation

Policies QHSN38 and QHSN39 on Build to Rent accommodation (BTR) set out in the Draft Plan as a response to the Council's concern regarding the dominance and risk of over concentration of BTR schemes in the city and the creation of sustainable communities are noted by the OPR. Concerns are however, raised by the OPR and it is considered that these policies should be expressed in a more appropriate manner.

Specific concerns are raised regarding the requirement that 40% of apartments in BTR developments would be required to be 'standard build to sell apartments' stating that this would be difficult to implement in practice. It is stated that there is ambiguity in the text and it could be construed that it is the policy intent to seek that 40% of apartments in BTR schemes are intended as *development for sale* to individual purchasers.

It is stated by the OPR that there are no ministerial guidelines on apartment developments for specifying that 40% of BTR developments are to be of a different set of internal design standards.

The OPR consider that a preferable approach would be to strengthen Policy QHSN38 and that this would empower the City Council through the planning application process, to clearly signal to a potential applicant if an undue concentration of BTR situation was potentially occurring, and to consider alternative mixes of use and housing type. It is also suggested that it may be helpful for the Planning Authority to set out alternative development plan criteria in relation to particular thresholds at or near which an undue concentration of BTR development in a spatial or tenure mix context could be presenting.

The OPR also assert that there is no national or regional policy basis, or any other evidence provided, to support the view that a scheme of less than 100 units cannot provide meaningful communal facilities and services. In this regard, specific concern is raised regarding Policy QHSN39, which discourages BTR accommodation schemes of less than 100 units and that this may conflict with wider policy objectives set out in the NPF and the RSES.

The OPR also set out concerns regarding Section 15.9.1 and Table 37 of the Draft Plan relating to housing mix. They note a potential conflict with SPPR8 regarding the application of housing mix to BTR schemes. It is stated that the unit mix requirements for the North Inner City and Liberties sub areas would, therefore, have the effect of imposing a restriction on dwelling mix in BTR schemes which are obliged to contain 40% build to sell standard under policy QHSN38, inconsistent with SPPR 8 (i) of the above guidelines.

Accordingly, the OPR sets out the following recommendation:

Recommendation 5 - Build to Rent Accommodation: Policies QHSN38 & QHSN39

Having regard to the significant need for rental accommodation identified in the Housing Strategy and interim Housing Need Demand Assessment, the Housing Supply Target set out in the Core Strategy, the Draft Plan's policies and objectives supporting housing delivery in particular CSO7, SC8, QHSN3 and QHSN5 the Planning Authority is required to:

(i) omit policy QHSN39 which universally discourages BTR accommodation schemes of less than 100 units, or revise the policy to apply clear and reasonable performance-based criteria for the evaluation of communal facilities and services and having regard to national (NPO 4 and NPO 6) and regional (RPO 4.3 and RPO 5.5) policies of the *National Planning Framework* and *Regional Spatial and Economic Strategy* respectively; and

(ii) amend policy QHSN38 to omit the following text which is inconsistent with SPPR 8 of the *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities* (DHLGH, 2020):

‘There will be a general presumption against large scale residential developments (in excess of 100 units) which comprise of 100% BTR typology. To ensure a sustainable mix of tenure and long-term sustainable communities, a minimum of 40% of standard build to sell apartments will be required in such instances.’

3.2 Traveller Accommodation

The OPR states that it is considered that the inclusion of a policy of general support for the TAP does not serve to communicate clear and implementable objectives for the provision of accommodation for Travellers.

The following recommendation is set out by the OPR:

Recommendation 6 - Traveller Accommodation

Having regard to the requirements of section 10(2)(i) of the *Planning and Development Act 2000*, as amended, the Planning Authority is required to include objectives in the plan for the provision of accommodation for Travellers, and the use of particular areas for that purpose in accordance with the legislative requirements under section 10(2)(i) of the Act. This will include the identification of specific locations on the land use zoning maps contained in adopted City Development Plan.

Chief Executive’s Response

3.1 Build to Rent Accommodation

Introduction

The OPR acknowledges the concern of the City Council with regard to the prevailing trend and over concentration of the BTR typology in the city. However, the CE considers it important to set out the full context of the significance of this issue and the supporting rationale for policies QHSN38 and QHSN39. It is also important to note that the introduction of the BTR policy is to respond to the strategic directions issued by the elected members in June 2021 which required the matter of overconcentration regarding Build to Rent to be considered further in the Draft Development Plan.

The concept of BTR first emerged under the 2018 Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, which were further amended in 2020.

Under the guidelines, BTR accommodation is seen as having potential to accelerate the delivery of new housing at a significantly greater scale than for traditional housing, where the pace of

development is believed to be largely determined by the rate at which individual homes, including apartments, can be sold. The guidelines state under paragraph 5.8 regarding BTR:

“The potential to augment existing housing delivery models by attracting new investment into the sector will assist in achieving additional housing output” (CE emphasis).”

It is clear, therefore, that BTR is intended to constitute an element of the housing market and to augment a range of housing models/typologies.

Notwithstanding this guidance, the trend now being observed within the city is that virtually all applications for housing comprise BTR.

The policy focus of achieving compact growth has meant that over the past 5 years, the predominant housing typology being constructed within the Dublin City Council area constitutes apartment development. Data from the Housing Returns as of Q1 2021, indicates that of 22,972 residential units permitted, just 1,272 were houses, representing 5.5% of the total.

Data from planning registry indicates that between 2018 and 2021 over 16,000 BTR units have been permitted/pending in the city area (as described on the statutory notices). The table which shows this typology as a percentage of the overall number of units permitted/pending clearly shows the increasing dominance of BTR.

BTR and All Residential Units Permitted/Pending 2018-2020

| Year | 2018 | 2019 | 2020 |
|---|-------------|-------------|-------------|
| ¹ No. Residential Units Permitted/Pending | 2,942 | 9,021 | 7,281 |
| ² No. BTR Units Permitted/Pending (a subset of residential units permitted/pending) | 453 | 4,547 | 5,956 |
| ³ BTR as % of Residential Units | 15.4% | 50.4% | 81.8% |

1. Source: Dublin City Council DHTF – Residential units from planning applications and SHD applications registered 2018-2020 in Tier 1 sites (permission granted) and Tier 2A sites (pending decision) in Q4 2020. Excludes student accommodation, shared accommodation, social housing and residential applications less than 10 units.
2. BTR units from planning applications and SHD applications (described in the development proposal as ‘Build to Rent’) registered 2018-2020 and granted planning permission or pending a decision by 31/12/2020 based on DCC extracted figures.
3. BTR units as percentage of overall number of residential units permitted/pending.

Furthermore, there is evidence that there are significant large scale BTR developments being permitted in the city. Four notable examples include planning application reference SHD0015/19 – 678 BTR units at Clongriffin; planning application reference 4238/19 – 1,195 BTR units Naas Road; planning application reference SHD0015/21 – 1,592 BTR units at Holy Cross College; and planning application reference SHD0026/20 – 702 BTR units at Castleforbes Business Park.

Long Term Impacts

The dominance of BTR housing is a concern having regard to its potential to have significant long term adverse impacts on the housing needs of the city and the creation of long-term sustainable communities.

The Draft City Plan acknowledges that BTR serves an important role in meeting housing demand and can fill a gap in tenure mix in established areas of owner-occupier housing. However, there are potentially significant negative impacts associated with having such a dominance of BTR housing in the city. Such potential negative impacts are particularly highlighted in the 2019 report 'Institutional Investment in the Housing Market' prepared by the Department of Finance to examine the role of institutional investors and large-scale landlords in the Irish residential property market. This report raises a number of significant issues summarised as follows:

- Given the limited number of new apartment completions overall and the relatively narrow geographic focus of institutional investor's to-date, there have been instances in which such investors have purchased the vast majority of apartments that come to market in a particular area. Although many of these apartments would likely have been purchased by BTL investors and not owner-occupiers, such purchases may have the effect of reducing the choice available to some first-time buyers purchasing in their own locality.
- There is a risk that at sufficient scale, an institutional investor or group of investors could, over time, develop monopolistic or oligopolistic pricing power. Theoretically, such price-setting power could be attained at a local level given certain market conditions and sufficient scale.
- There is a risk that should BTR investment continue at current growth rates, market forces would over the long-term create socio-economic polarisation in some urban areas.

The report counsels that although in the main a positive development, the activities of real estate investment trusts, funds and private equity firms pose broader, long-term questions for policymakers in relation to tenure, affordability and the socio-economic make-up of urban areas. It is noted that expansion of the sector must continue to be accompanied by a set of policies that can facilitate its positive impacts while addressing the broader issues it raises. As noted by the Department, it is incumbent that policy makers consider the implications of this shift in tenure profile and it is in this context that the proposed policies of the city Plan must be considered. The CE considers that current trend and over dominance of the BTR sector in the city is unsustainable and will have long term implications in terms of the housing market and provision of an adequate housing supply to meet the needs of the citizens of Dublin. A more balanced approach is required that allow for the continued development of this sector but with appropriate safeguards.

There is also a significant concern as to the longer-term viability and suitability of this stock, when the BTR restrictive covenants end after a 15-year period. It is noted that many of the BTR schemes are designed to minimum standards and there are significant concerns regarding the wider legacy issues that this poses for the city if such units return to the market when the covenant withers. In this context, it is considered that there is a pressing need to ensure that a more diverse and higher quality of apartment development is constructed in the city to future proof our housing supply.

Meeting the Diverse Needs of the City

A particular significant concern of the Planning Authority is the potential impact that the dominance of BTR will have on the provision of housing stock that is suitable and appropriate to meet the diverse housing needs of the city.

BTR development is subject to the provisions of Part V of the Planning and Development Act (as amended). Notwithstanding the emergence of other delivery channels for the provision of social and affordable housing, Part V will continue to be a significant provider in terms of meeting these particular housing needs.

An analysis was carried out by the Planning Authority to examine what impacts the emergence of BTR as a new housing typology could have on traditional Part V housing delivery. Anonymised data was obtained from DCC's Housing and Community Services Department regarding Part V agreements. The data available details the number of units coming under the remit of Part V legislation for existing Part V agreements in place, as well as ongoing negotiations and projections based on planning approvals and pre-submission discussion.

The data indicates that BTR has quickly become the dominant source for Part V provision from a zero base in 2016. It is projected that in 2024, BTR will result in the provision of nearly 80% of overall Part V agreements in the city. The overall trend is clear in terms of the balance of provision through BTR versus more traditional forms of residential development.

Given that the BTR typology is subject to a relaxation in development standards in terms of unit mix and size, this raises some important considerations regarding the suitability of the typology for meeting Part V housing needs on site. There are significant concerns regarding the suitability of such BTR units to meet the varied housing needs of the expected residents including provision for Universal Design, specialist needs and the differing size and make up of family units in the city and their use as a long-term form of housing for more vulnerable members of society.

The issue of Universal Design is of particular pertinence having regard to the specific derogations that apply in relation to units and size and the fact that BTR schemes are not required to provide 10% of units exceeding the minimum unit size thresholds set out in the Apartment Guidelines. The recently published DHLG&H's Design Manual for Quality Housing 2022 and Action 4.6 of the DHP&LG & DH's Housing Options for Our Ageing Population Policy Statement 2021, specifically mandates the need for universal design to cater for the needs of older people/mobility impaired people and people with disabilities. This is likely to be significantly more difficult to achieve in BTR schemes designed to minimum standards without policy intervention to ensure design diversity. The Draft Plan is obliged to respond to the issues outlined in both documents.

The lack of larger units within BTR scheme also negates against the now established practice of grater working from home. With the move towards more blended working practices, the minimum sizes and lack of larger units within BTR schemes is considered potentially problematic.

Housing Mix

Another significant implication of the dominance of the BTR model in the city is the lack of diversity in housing mix. A review undertaken of submitted BTR applications for 16,246 units in the city from January 2018 to the end of 2021, indicates that the majority of the units proposed

constitute studio and 1 bed units (56.2%) with a more limited amount of 2 bed units (32.3%). Virtually no 3 bed or family units have been proposed or permitted (2.1%). For clarity, national guidance on BTR development places no restrictions on dwelling mix.

Such mix requirements in successful residential typologies have become generally accepted as good planning practice in order to seek to establish, develop and maintain sustainable, balanced and functional communities without segregation by class, age, employment, nationality, etc. The emergence of very large schemes solely comprising of BTR with a lack of housing mix is considered inappropriate and will not contribute to the creation of long term viable and stable communities. Under the Draft Plan, further significant tracts of brownfield former industrial land are likely to come forward for development. This will include significant regeneration areas such as the Naas Road, for which a masterplan is currently being prepared in conjunction with South Dublin County Council funded by URDF (City Edge Project). There is a concern that the development of significant BTR schemes in such areas will create an imbalance in terms of housing mix and tenure with implications for the creation of successful long-term communities.

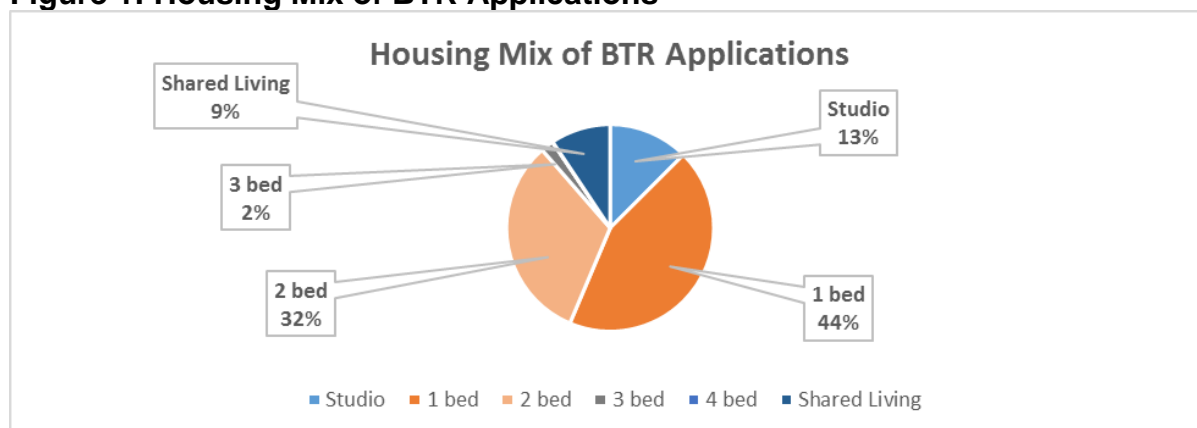
The concerns regarding the negative impacts of BTR dominance on housing mix are also highlighted in the submission by the NTA which states:

“The NTA has raised the issue of diversity of housing type and tenure on a number of occasions through our role as a prescribed body in the planning process. The concern raised related to the potential for medium-high density development forms to be associated with particular types of housing to the exclusion of others. In most cases, this manifests itself through a preponderance of 1- bed and 2-bed apartment units, in many cases predominantly or exclusively of the Build-to-Rent tenure, located along public transport corridors, meaning that very few new family homes, new homes suitable for the elderly, or new homes for purchase, were being planned in locations where the need to use a private car was reduced by the availability of alternatives. The NTA supports the policies and objectives of the Draft City Development Plan which aim to address this issue and which aim to expand the market for highly accessible, medium-high density development to a wide range of potential household types.”

**Table 1: Housing Mix of BTR Applications
Registered between 01/01/2018 – 31/12/2021, with status of ‘Granted, Split, currently on Appeal or Pending a decision’**

| Total | Studio | 1 bed | 2 bed | 3 bed | 4 bed | Live Work | Shared Living |
|--------------|---------------|--------------|--------------|--------------|--------------|------------------|----------------------|
| 16,246 | 1,940 | 7,192 | 5,251 | 341 | 4 | 4 | 1,514 |
| % | 11.9% | 44.3% | 32.3% | 2.1% | 0.0% | 0.0% | 9.3% |

Figure 1: Housing Mix of BTR Applications



Conclusions

The core vision of the Draft Dublin City Development Plan is to ensure the continued consolidation of the city, with sustainable patterns of development and the creation of a dynamic and vibrant city core complemented by well serviced and integrated neighbourhoods. Creating liveable neighbourhoods which provides for quality housing and social infrastructure is essential to delivering sustainable communities. This is in line with the strategic objectives of the NPF and the RSES.

The provision of an appropriate quantity and quality of residential accommodation of an appropriate density and design in well-designed urban neighbourhoods is a key objective of the plan, and in this regard, the Council want to ensure that good quality housing across owner occupied and rental housing tenures is provided in sustainable communities in the city.

Whilst the important role of BTR is acknowledged in the city Plan (Chapter 5, page 184), it is considered that it should provide a component of future housing stock, rather than its entirety. It is in this context that the policy provisions QHSN38 & QHSN39 are proposed.

It is considered that in the absence of such a policy framework, that the city will have failed in its statutory obligations to consider the implications of this shift in tenure on the long-term proper planning and sustainable development of the city.

It is considered, therefore, that the policy approach is appropriate and proportionate. It will help avoid legacy issues and will future proof housing stock to ensure that apartment developments are built to a higher standard with a greater diversity of unit type and size.

Policy QHSN38 of Draft Plan

The purpose of this policy is to ensure that in apartment developments over 100 units, that 40% of those units must be of a standard design in accordance with the guidance set out in the Sustainable Urban Housing: Design Standards for New Apartments, December 2020. The remaining units – 60% can be designed in accordance with the specific BTR standards set out under section 5 of the guidelines and SPPR 7 and 8. For clarity, it is not considered that a BTR development would accommodate Build to Sell units, but rather that it would comprise two distinct elements – BTR standard units and apartments as per the 2020 Guidelines.

Specific concerns are raised by the OPR as to how the 60:40 mix would work in practice. Whilst the OPR comments are noted, it is the view of the CE that this is a detailed design matter that would be addressed at planning application stage. Furthermore, the CE is satisfied that a

qualified architect would have the necessary skills and competencies to design a scheme to comply with the policy through either the provision of separate blocks or core arrangements. It is noted that there are many precedents of schemes comprising of BTR and co-living units and it is, therefore, considered, that the design of a scheme comprising of two distinct design standards is feasible and possible.

It is also contended by the OPR that there is no evidential basis for identifying a requirement for 40% of non BTR units. In this regard, the Planning Authority reviewed Stamp Duty Transactions on Residential Property Sales for the period 2017-2021. The CSO publishes data on Stamp Duty transactions on sale completions by county. This data categorises First Time Buyers (FTB) new housing purchases and non-FTB purchases (other) separately into private non-households, public non-households (AHB, etc.) and forward funded sales (i.e. PRS, BTR, etc.).

The distinction makes it possible to compare transactions in Dublin (County) between these categories and identify trends over time. While the data does not create a distinct categorisation for PRS alone, it is informative generally of observable trends in the Dublin area.

For Dublin, FTBs home purchases have reduced by some 30% since 2017, and other buyers by 45.6% again since 2017. Overall, in Dublin, purchases of new homes are down 38.6% in the same period. When looking at FTBs as a proportion of new homes completions, it can be seen that FTBs in Dublin are down from 56.69% in 2017 to 31.38% in 2021. At the same time, non-market transactions, including PRS have increased from 36.68% to 65%. While there are a variety of interdependent factors impacting on the housing market, including Central Bank regulation, the inference that could be drawn from CSO data is that in 2021, the growth in non-market transactions noticeably displaced FTBs in new home completions compared to that in 2017. It is in this context that the 40% is considered appropriate and is supported by evidential data from the CSO.

The CE notes the comments by the OPR that the written text of the policy is ambiguous and could be misinterpreted that the policy's intent is seeking 40% of apartments in BTR schemes for *development for sale* to individual purchasers. It is acknowledged that in the absence of direction from central government (similar to circular NRUP 03/2021 which provides for planning conditions to be attached to restrict new houses and duplexes to first occupation and use by individual purchasers and those eligible for social and affordable housing including cost-rental) the Planning Authority cannot impose a condition restricting the sale of apartments to individual purchasers. To address this, textual amendments are proposed to policy QHSN38 to clarify this matter.

With regard to the OPR comment that there is no national policy grounding in the Minister's guidelines (December 2020) on apartment developments for specifying that 40% of BTR developments are to be of a different set of internal design standards, the CE has a different interpretation of the guidelines. The Planning Authority has had full regard to the guidance set out in the Sustainable Urban Housing: Design Standards for New Apartments, December 2020 and is satisfied that the proposed policy does not contravene the guidelines or any of the SPPR's set out therein.

The Apartment guidelines sets out two very specific and distinct sets of apartment standards – those pertaining to Build to Rent schemes and those pertaining to standard apartment schemes. There is no policy provision in the guidelines to prevent or preclude a Planning Authority specifying that two different standards should apply to an apartment scheme. The policy approach proposed in the Draft Plan does not circumvent or negate the application of SPPR 7

and 8 to those units that are designed to a BTR standard. From the outcomes of the research set out above, the CE is of the view that the policy approach is appropriate and proportionate.

It is noted that the OPR suggests that it may be appropriate for the Planning Authority to consider alternative development plan criteria in relation to particular thresholds at or near which an undue concentration of BTR development in a spatial or tenure mix context could be presenting. This relates specifically to Policy QHSN38 which states that there will be a presumption against the proliferation and over concentration of BTR development in any one area.

The issue of applying some form of quantitative threshold to define over concentration has been considered by the Planning Authority.

It is considered however, that providing a precise quantitative definition of what constitutes an over concentration is overly prescriptive and a more nuanced approach is required that considers both qualitative and quantitative factors. It is considered that this matter is best addressed at planning application stage as part of the development management assessment, rather than setting out prescribed standards in a strategic policy document. This is a complex area and will require regard to the site-specific circumstances, planning history, tenure mix and locational characteristics of the particular local area in the city to which the application pertains. The Development Plan cannot prescribe a response to all circumstances but does set the appropriate policy context. The CE however, does recommend that the 3km distance for assessing the matter of overconcentration is inappropriate and should be reduced to 1km. This is discussed further in the CE response regarding Chapter 5.

In conclusion, it is the view of the CE that Policy QHSN38 should be retained with minor modification as:

- It is considered integral to achieve the wider objectives and vision of the plan;
- It will the future proof the housing stock of the city, avoid undesirable legacy issues and ensure a higher quality of development;
- It will ensure a greater mix of housing types and sizes addressing the needs of those who require adaptable/universal standard design;
- It will contribute to the creation of long-term sustainable communities and
- It will ensure that housing needs for all is met.

Policy QHSN39

This policy discourages BTR schemes of less than 100 units. From the pattern of development management applications, the Planning Authority is aware of an increasing quantum of very small BTR schemes proposed, often to designed to minimum standards, in the city. It remains the view of the Planning Authority, that given the derogations in standards that are applicable to BTR schemes, including private open space, that it is often difficult on smaller sites to provide adequate and meaningful compensatory communal support facilities and amenities.

However, it was not the intent of the policy to preclude schemes of less than 100 units in their entirety, rather that they should not be the norm. It is acknowledged that there are instances where a BTR scheme of less than 100 units may be merited, particularly on constrained urban sites in the inner city. In this context, amendments are proposed to the policy to provide clarity on this issue.

Housing Mix

Section 15.9.1 and Table 37 specify specific housing mix requirements in the North Inner City and the Liberties Sub Area.

The OPR highlight that the unit mix requirements for these sub areas would have the effect of imposing a restriction on dwelling mix in BTR schemes which are obliged to contain 40% build to sell standard under policy QHSN38, inconsistent with SPPR 8 (i) of the above guidelines.

Again, the CE has a different interpretation of the guidelines. The provisions of SPPR 8 are only applicable to those units that are designed in accordance with the BTR standards under SPPR 7. It is also clear from the guidelines, that the provisions of SPPR1 are applicable to standard designed apartments. In this regard, the unit mix requirements set out in section 15.9.1 and Table 37 are applicable to the 40% of units that would have a standard design in any development. Textual amendments are proposed to provide clarity on this matter.

3.2 Traveller Accommodation

Recommendation 6 - Traveller Accommodation

The Dublin City Development Plan will come into force at the end of 2022. The current Dublin City TAP ends in 2024. Given the lack of synchrony between the plans and the current onerous legislative requirements relating to amendments to Development Plans, it is considered reasonable as an interim measure, to provide a copy of the existing Map of Dublin City Council Traveller Group Housing Schemes and Traveller Halting Sites included in the current TAP 2019-2024 as it relates to Traveller accommodation in Appendix 1 of the plan. This situation can be reviewed post the adoption of the successor TAP as part of the 2-year statutory review of the Development Plan and following the publication of revised Development Plan Guidelines.

As noted by the OPR in their Case Study Paper CSP03 - Traveller Accommodation and the Local Authority Development Plan, it is not actually stipulated in section 10(2)(i) of the Act that it is a requirement to map particular areas for the purpose of traveller accommodation.

It is further noted that the Draft Development Plan Guidelines have not indicated a mandatory requirement to include the identification of specific locations for Traveller accommodation on the land use zoning maps for development plans. Rather the Draft Guidelines advocate that zoning policies should be drawn up in a flexible manner to reflect the need to secure additional Traveller accommodation over the lifetime of the Plan. In this instance, and consistent with the approach in previous plans, the current Draft City Development Plan identifies Traveller accommodation as a permitted use in Zoning Objectives Z1, Z4, Z10, Z12 and Z14. This is in line with the approach set out the Draft Plan Guidelines and will enable greater flexibility having regard to the expected future significant development opportunities that will arise in SDRAs, brownfield lands and through statutory Local Area Plans.

For information, it is noted that some accommodation sites are located outside the administrative area of Dublin City Council. Dublin City Council cannot, therefore, include these sites on Dublin City Zoning Maps.

With regard to specific mandatory compliance with Section 10(2)(i) of the 2000 Act, *“the provision of accommodation for travellers, and the use of particular areas for that purpose”*, it is noted that the provision for Traveller accommodation in the zoning objectives referenced above would comply with this requirement and in this regard, the CE considered that the policy

approach is consistent with the Act and the Draft Guidelines. For further clarity, it is additionally proposed to augment the existing policy narrative in Chapter 5 of the Draft Plan relating to Traveller accommodation to include an additional specific objective.

Chief Executive's Recommendation

3.1 Build to Rent Accommodation

Recommendation 5 - Build to Rent Accommodation: Policies QHSN38 & QHSN39

Chapter 5

Section: 5.5.7 Specific Housing Typologies, subheading Build to Rent (BTR) and Shared Accommodation

Page: 184-185

Amendment:

It is recognised that Build to Rent (BTR) serves an important role in meeting housing demand and can fill a gap in tenure mix in established areas of owner-occupier housing. Recent emerging trends however, would indicate that the dominance of BTR in large schemes can be to the detriment of {standard designed apartment} ~~(build-to-sell)~~-units. Whilst such development has its place in the hierarchy of provision of homes across the city, the Planning Authority will seek to avoid over proliferation of such use in certain areas and encourage such development as part of a healthy mix of tenure in order to create sustainable communities and neighbourhoods.

BTR should be concentrated in prime inner-city areas and also in areas of high intensity employment use, ~~(such as within 500 metres walking distance of a high employment area i.e. more than 500 employees per hectare,)~~ within 500m of major public transport interchanges ~~((e.g. Connolly Station, Tara Street Station and Heuston Station))~~ and within identified Strategic Development Regeneration~~(s Zones)~~ {Areas}. Furthermore, applications for BTR schemes should be required to demonstrate that there is not an over-concentration of Build to Rent Accommodation within an area, including a map showing all such facilities within ~~{(1km)}~~ ~~((3km))~~ of a proposal. Such housing will be controlled in the interest of providing a mix of tenure and unit types. In assessing the matter of overconcentration, the Planning Authority will have regard to factors such as:

- the number and scale of other permitted BTR development in the vicinity ~~{(1km)}~~ ~~((3km))~~ of the site,
- the household tenure and housing type of existing housing stock in the approximate vicinity ~~{(1km)}~~ ~~((3km))~~ of the site,
- and the proximity of the proposal to high-capacity urban public transport stops and interchange (such as DART, Luas and BusConnects).

There will be a general presumption against large scale residential developments (in excess of 100 units) which comprise of 100% BTR typology, {to ensure there are opportunities for a sustainable mix of tenure and long-term sustainable communities. Smaller infill BTR schemes of less than 100 units on infill sites will be considered on a case by case basis in prime urban areas where it is demonstrated that adequate amenities and appropriate standards of development are provided.}

~~(To ensure a sustainable mix of tenure and long term sustainable communities, a minimum of 40% of standard build to sell apartments will be required in such instances. BTR schemes of less than 100 units will generally not be supported. The concept of Built to Rent requires a critical mass of accommodation to provide a meaningful provision of communal facilities and services. Smaller BTR schemes with less than 100 units will only be considered where it can be demonstrated that there is a strong need for the development and a detailed justification is provided.)~~

Chapter 5

Section: 5.5.7 Specific Housing Typologies, subheading Build to Rent (BTR) and Shared Accommodation

Page: 186, Policy QHSN38

Amendment:

Policy QHSN38 Build to Rent Accommodation

To facilitate the provision of Build to Rent (BTR) Accommodation in the following specific locations:

- Within the Inner City ~~((i.e. within the canal ring))~~.
- Within 500 metre walking distance of a high employment area i.e. more than 500 employees per hectare.
- Within 500 metres of major public transport interchanges (e.g. Connolly Station, Tara Street Station and Heuston Station), and
- Within identified Strategic Development Regenerations Areas.

There will be a general presumption against large scale residential developments (in excess of 100 units) which comprise of 100% BTR typology. To ensure {there are opportunities for} a sustainable mix of tenure and long-term sustainable communities, a minimum of 40% of ~~(standard build to sell apartments)~~ {units within a development must be designed as standard apartments in accordance with the requirements set out in the Sustainable Urban Housing: Design Standards for New Apartments, December 2020} ~~(will be required in such instances)~~. There will be a presumption against the proliferation and over concentration of BTR development in any one area. In this regard, applications for BTR developments should be accompanied by an assessment of other permitted BTR developments in the vicinity ~~{(1km)}~~ ~~((3km))~~ of the site to demonstrate that the development would not result in the overconcentration of one housing tenure in a particular area and take into {account} ~~(regard)~~ the ~~(geographical area)~~ {location} of the {proposed} BTR.

Chapter 15

Section: 15.10 Build to Rent Residential Developments (BTR)

Page: 706

Amendment:

“Build to Rent” (BTR) refers to purpose built residential accommodation and associated amenities built specifically for long term rental that is managed and serviced in an institutional manner by an institutional landlord. Recent emerging trends would indicate that the dominance of BTR in large schemes can be to the detriment of {standard designed apartment} ~~(the build~~

~~to sell~~) units. Dublin City Council will consider “Built to Rent” developments in specific locations as follows:

- Within the Inner City ~~((i.e. within the canal ring))~~.
- Within 500m walking distance of a high employment area i.e. more than 500 employees per hectare.
- Within 500m of major public transport interchanges (e.g. Connolly Station, Tara Street Station and Heuston Station), and within identified Strategic Development Regenerations {Areas}(Zones).

~~(There will be a general presumption against large scale residential developments (in excess of 100 units) which comprise of 100% BTR typology. To ensure a sustainable mix of tenure and long term sustainable communities, minimum of 40 % of standard build to sell apartments will be required in such instances.)~~

{Please refer to section 5.5.7 of this City Development Plan – Policy QHSN38.}

{Smaller infill BTR schemes of less than 100 units on infill sites will be considered on a case by case basis in prime urban areas where a detailed justification is provided and it is demonstrated that adequate amenities and appropriate standards of development are provided.}~~(BTR schemes of less than 100 units will generally not be supported. The concept of Built to Rent requires a critical mass of accommodation to provide a meaningful provision of communal facilities and services. Smaller BTR schemes with less than 100 units will only be considered where it can be demonstrated that there is a strong need for the development and a detailed justification is provided.)~~

Furthermore, whilst BTR is considered to be an integral part in achieving an appropriate mix of housing in the right locations, there will be a presumption against the proliferation and over concentration of Build to Rent development in any one area (refer to Section 5.5.7 of Chapter 5 Quality Housing and Sustainable Neighbourhoods). Applications for “Build to Rent” developments should be accompanied by as assessment of other permitted BTR developments in the vicinity {1km}~~((3km))~~ of the site to demonstrate that the development would not result in the over concentration of one housing tenure in a particular area.

Chapter 5

Section: 5.5.7 Specific Housing Typologies, subheading Build to Rent (BTR) and Shared Accommodation

Page: 186, Policy QHSN39

Amendment:

Policy QHSN39 Build to Rent Accommodation

To ~~(discourage)~~ {ensure that} BTR Accommodation schemes ~~(of less than 100 units due to the need to provide a critical mass of accommodation to)~~ provide a meaningful provision of communal facilities and services, ~~(Smaller BTR accommodation schemes with less than 100 units will only be considered in exceptional circumstances and where a detailed justification is provided.)~~ {developments with less than 100 units will be considered on a case by case basis particularly on infill inner city sites, where a detailed justification is

provided and it is demonstrated that adequate amenities and appropriate standards of development are provided.}

Chapter 15

Section: 15.9.1 Unit Mix

Page: 692

Amendment:

SPPR 2 provides some flexibility in terms of unit mix for building refurbishment schemes on sites of any size, urban infill schemes on sites up to 0.25 ha, schemes up to 9 units and for schemes between 10 and 49 units. The Planning Authority will assess each application having regard to SPPR 2 on a case by case basis. For further details, please refer to The Sustainable Urban Housing: Design Standards for New Apartments (December 2020) guidelines. {For clarity, in accordance with SPPR 8, the unit mix requirement for the North Inner City and Liberties Sub-City Areas does not apply to units that are designed to a BTR standard.}

Volume 2: Appendix 1

Section: Housing Strategy

Pages: 58-59, Table 37 Exemptions

Amendment:

In accordance with Specific Planning Policy Requirement 2, all building refurbishment schemes on sites of any size, or urban infill schemes on sites of up to 0.25ha, where up to 9 residential units are proposed, notwithstanding SPPR 1, there shall be no restriction on dwelling mix, provided no more than 50 percent of the development (i.e. up to 4 units) comprises studio-type units. {For clarity, in accordance with SPPR 8, the unit mix requirement does not apply to units that are designed to a BTR standard.}

3.2 Traveller Accommodation

Recommendation 6 - Traveller Accommodation

Chapter 5

Section: 5.5.5 Housing for All, subheading Traveller Accommodation

Page: 179

Amendment:

Traveller Accommodation

The Traveller Accommodation Programme 2019-2024, identifies the requirement to provide or assist in the provision of over 200 units across a full range of accommodation types over the period of the programme. The Council will continue to address the provision of accommodation appropriate to the particular needs of Travellers through the implementation of the programme. {Further details relating to the provision of Traveller accommodation can be found in the current Dublin City TAP at <https://www.dublincity.ie/sites/default/files/2021-02/dublin-city-council-traveller-accommodation-programme-2019-2024.pdf> and a Map of Dublin City Council Traveller Group Housing Schemes and Traveller Halting Sites is set out in Appendix 1. Please contact traveller.accommodation@dublincity.ie for further information.}

Chapter 5

Section: 5.5.5 Housing for All, subheading Traveller Accommodation

Page: 180 - New Objective to be inserted after Policy QHSN29, subsequent objective numbering to be amended accordingly

Amendment:

{Objective QHSNO11

Dublin City Council Traveller Accommodation Programme 2019-2024

To secure the implementation of the Dublin City Council Traveller Accommodation Programme 2019-2024 (TAP), to provide a range of accommodation options for Travellers who normally reside in the Dublin City area and who wish to have such accommodation and to review and update this programme during the course of the Development Plan.}

Volume 2, Appendix 1

Section: 7.2.3 Specialist Provision Support from Dublin City Council, subheading: Meeting the Housing and Accommodation Needs of the Travelling Community

Page: 68

Amendment:

Insert map - [Map of Dublin City Council Traveller Group Housing Schemes and Traveller Halting Sites](#)

4. Economic Development and Employment

Summary

4.1 Employment Zoned Land

The submission from the OPR notes the strategic approach set out in the Draft Plan and are satisfied that it aligns with the overall goals of the NPF, RSES and Dublin MASP. Having regard to the previous strategic study of all Z6 and Z7 lands which resulted in a number of variations to the current Dublin City Development Plan, the OPR supports the approach that residential development is no longer open for consideration on Z6 land. The OPR recommend that objectives CSO2 and CSO14 include a reference to the emerging City Edge Project.

4.2 City Centre and Retail

It is considered by the OPR that the retail hierarchy accords with the RSES. The Office welcomes and supports the wide range of measures set out in section 8 to support the city centre including outdoor dining and cultural vibrancy and marketing. The proposed development of guidelines for residential use of vacant upper floors are particularly welcome.

Chief Executive's Response

The comments of the OPR regarding Chapter 7 and Appendix 2 of the plan are noted and welcomed.

4.1 Employment Zoned Land

Having regard to the submission of the OPR, the CE concurs that it is appropriate for the Draft Plan to be updated to make reference to the City Edge Project.

Chief Executive's Recommendation

No change to the plan with respect to Chapter 7 or Appendix 2.

4.1 Employment Zoned Land

It is recommended that the following amendments are made to section 2.3.5 of the Draft Plan and to policies CSO2 and CSO14.

Chapter 2

Section: 2.3.5 Future Development Areas

Page: 69

Amendment:

Two significant areas identified in the Z6 and Z7 zoned lands study remain mostly zoned Z6 within the development plan:

- Kylemore Road/Naas Road lands **{(currently the focus of the City Edge Project, see www.cityedge.ie)}** and
- Glasnevin (the Dublin Industrial Estate and surrounding lands).

Amendment:

Objective CSO2 Local Statutory Plan for lands at Kylemore Road/Naas Road and Ballymount {(City Edge)}

{In accordance with the objectives of the City Edge Project}, to prepare a local statutory plan in conjunction with South Dublin County Council for lands at Kylemore Road/Naas Road and Ballymount lands to enable a co-ordinated and phased development on these lands over the medium to long term.

Amendment:

Objective CSO14 Co-ordinated Approach to Future Development of Strategic Growth Areas

To facilitate a co-ordinated approach to the future development of strategic growth areas including the Naas Road area {(City Edge Project)}, lands at Dunsink and the Belmayne-Clongriffin area, with South Dublin County Council, Fingal County Council respectively and relevant stakeholders.

5. Sustainable Transport and Accessibility

Summary

The achievement of the Council with respect to transport and accessibility are noted by the OPR and the policy approach to support modal shift, compact growth, decarbonising transport and transition to more sustainable travel modes is welcomed. The OPR is satisfied that the Draft Plan includes appropriate development management standards, particularly maximum parking standards.

The OPR makes a number of recommendations regarding the cross referencing of roads objective on the maps; the need for specific policies to support each of the major transport infrastructure projects which will commence over the Plan period and greater clarity regarding the Southern Port Access Route.

The following recommendation is set out:

Recommendation 7 - Strategic Transport Infrastructure

In order to ensure the effective planning, implementation and monitoring of the Development Plan, the Planning Authority is required, in consultation with the National Transport Authority (NTA) and Transport Infrastructure Ireland (TII), as appropriate, to:

- (i) update the transport objectives, and land use maps to ensure that the Draft Plan and the policy objectives therein are consistent with the NTA's *Draft Transport Strategy for the Greater Dublin Area 2022 – 2042* and that specific policies are set out in the Draft Plan for each of the major transport projects that will commence over the Plan period;
- (ii) provide greater clarity between the road, bridge and street schemes listed in objective SMT023 and the land use zoning maps including cross referencing as appropriate;
- (iii) to expand, within Chapter 13, on the details of the major transport schemes that are necessary to support the regeneration objectives of the SDRAs and to clearly outline the relationship between the development of the SDRAs and the provision of public transport infrastructure and services; and
- (iv) to include, in consultation with TII, a specific policy objective to support the delivery of the Southern Port Access Route as a public road and incorporate same into the Draft Plan and on any relevant mapping including requirements for the facilitation of any grade separation requirements as identified in the *Iarnród Éireann Rail Freight 2040 Strategy*.

Chief Executive's Response

Recommendation 7 - Strategic Transport Infrastructure

Policy SMT20 outlines Dublin City Council's supports of the key transport projects within the NTA's Transport Strategy. Reference to DCC's support of these projects is also referenced in the supporting text in Section 8.5.6 of the Draft Plan. It is not considered necessary to provide a separate policy for each specific project. However, the CE recommends that Policy SMT20 can be amended to make reference to the specific projects.

All of the roads, streets and bridges referenced in Objective SMT023 have been annotated on the various zoning maps accompanying the Draft Written Statement. The Chief Executive acknowledges however, that greater clarity and ease of reference can be provided within Objective SMT023, linking the relevant project to the associated map.

The CE recommends that Map K is updated to indicate the relationship of the SDRA's with existing and proposed major transport schemes. In addition, as noted above, it is recommended that a new table is included in Chapter 13 which indicates key supporting infrastructure, including public transport infrastructure for the SDRA's.

The CE recommends that Policy SMT28 be amended to update the policy having regard to Measure ROAD5 policy in the Draft NTA GDA Transport Strategy 2022-2042. An indicative alignment for this road is already provided within Map J. Policy SMT21 supports the rail network and freight transport. It is recommended that this policy be amended to include additional reference to the requirements identified in the *Iarnród Éireann Rail Freight 2040 Strategy*.

Chief Executives Recommendation

Recommendation 7 - Strategic Transport Infrastructure

Chapter 8

Section: 8.5.6 Sustainable Modes, subsection Public Transport

Page: 295, Policy SMT20

Amendment:

SMT20 Key Sustainable Transport Projects

To support the expeditious delivery of key sustainable transport projects ~~(including Metrolink, Bus Connects, DART+ and LUAS expansion programme)~~ so as to provide an integrated public transport network with efficient interchange between transport modes, serving the existing and future needs of the city and region. {In particular the following projects subject to environmental requirements and appropriate planning consents being obtained:

- DART +
- Metrolink from Charlemount to Swords
- Bus Connects Core Bus Corridor projects
- Delivery of Luas to Finglas
- Progress and delivery of Luas to Poolbeg and Lucan}

Chapter 8

Section: 8.5.9 Street/Road, Bridge and Tunnel Infrastructure

Page: 301, Objective SMT023

Amendment:

SMT023 Road, Street and Bridge Schemes

It is an Objective of Dublin City Council:

To initiate and/or implement the following street/road schemes and bridges within the six year period of the development plan, subject to the availability of funding and environmental requirements and compliance with the 'Principles of Road Development' set out in the NTA [{Greater Dublin Area}](#) Transport Strategy.

Roads and Streets

River Road [{Map A}](#)
Belmayne Main Street [{Map C}](#)
Sean Moore Road [{Map F}](#)
Cherry Orchard Link Roads [{Map D}](#)
Richmond Road [{Map E}](#)
Collins Avenue Extension [{Map B}](#)
Blackhorse Avenue [{Map D}](#)
Clonsaugh Road Industrial Estate [{Map B}](#)
Cappagh Road [{Map A}](#)
St. Margaret's Link Road [{Map B}](#)
Northern Cross/Belcamp Lane [{Map B}](#)
Santry Avenue Link Road [{Map B}](#)
Newtown Avenue [{Map B}](#)

Bridges

- Dodder Public Transport Bridge, linked with BusConnects 16 proposals [{Map E}](#).
- Bridge from North Wall Quay at Point Depot (Point Bridge) and the widening of Tom Clarke Bridge, improve pedestrian and cycling facilities at the crossing point as well as accommodating additional public transport routes in conjunction with the Dodder Bridge [{Map E}](#).
- Pedestrian/cycle bridge crossing the Liffey between the Samuel Beckett Bridge and the Tom Clarke Bridge [{Map E}](#).
- Liffey Valley Park pedestrian/cycle bridge [{Map E}](#).
- Pedestrian/Cycle Bridge across River Liffey from Irish National War Memorial Gardens/Islandbridge to the Chapelizod Road, Islandbridge [{Map D}](#).
- Cycle/pedestrian bridges that emerge as part of the evolving Strategic Cycle Network and Strategic Green Infrastructure Network.
- Broadstone to Grand Canal pedestrian/cycle bridge [{Map E}](#).

Mapping Amendment: Amend Map K to include the existing and public transport alignments within the SDRA's.

Chapter 8

Section: 8.5.9 Street/Road, Bridge and Tunnel Infrastructure

Page: 300, Policy SMT28

Amendment:

SMT28 National Road Projects

It is policy of Dublin City Council:

To protect national road projects as per the NTA Strategy for the Greater Dublin Area 2016 – 2035 and its review, {and in consultation with TII and the NTA, to support} ~~(including)~~ the ~~(provision)~~ {delivery} of ~~(a)~~ ~~{the}~~ Southern Port Access Route to Poolbeg, {as a public road}.

Chapter 8

Section: 8.5.6 Sustainable Modes, subsection Public Transport

Page: 295, Policy SMT21

Amendment:

SMT21The Rail Network and Freight Transport

- (i) To work with Iarnród Éireann/Irish Rail, the NTA, TII and other operators to progress a coordinated approach to improving the rail network, integrated with other public transport modes to ensure maximum public benefit and promoting sustainable transport and improved connectivity.
- (ii) To facilitate {and support} the needs of freight transport in accordance with the NTA's Transport Strategy for the Greater Dublin Area 2016 – 2035 ~~(and forthcoming review)~~ {and its review} and {enhance the capacity on existing rail lines and services to provide improved facilities promoting the principles of sustainable transport to cater for the movement of freight by rail}.
- (iii) {To support the outcomes of the Iarnród Éireann/Irish Rail Rail Freight 2040 Strategy}.

6. Climate Action and Renewable Energy

Summary

The OPR welcomes the integration climate actions as an overarching theme in the Draft Plan. In particular, policies relating to low carbon district heating, waste heating recovery and utilisation and micro-renewable energy production are welcomed.

The submission notes that the *Climate Action and Low Carbon Development (Amendment) Act, 2021 has been adopted and Climate Action Plan 2021* has since been published and the Draft Plan will require some revisions with respect to the references made to both of these statutory documents.

Chief Executive's Response

The CE notes the OPR recommendations with regard to the *Climate Action and Low Carbon Development (Amendment) Act, 2021 and the Climate Action Plan 2021* which were subsequently adopted after the publication of the Draft Plan and considers it appropriate to update the Draft Plan accordingly.

Chief Executive's Recommendation

It is recommended that the Draft Plan is updated to refer to the *Climate Action and Low Carbon Development (Amendment) Act, 2021 and the Climate Action Plan 2021*. Please see CE response with respect to Chapter 1, 3 and 6.

7. Environment, Heritage and Amenities

Summary

7.1 Cultural Heritage

The policies and objectives set out under Chapter 11 of the Draft Plan are considered to comply with the mandatory national policies and objectives.

7.2 Green Infrastructure and Nature Based Solutions

The approach set out in the Draft Plan regarding Sustainable Urban Drainage Systems (SuDs), Green Infrastructure and Nature Based Solutions is welcomed and the OPR commends the inclusion of guidance on Green/Blue Roofs, Sustainable Drainage Design and Evaluation and Surface Water Management.

The OPR requests that Policy SI22 is updated to include reference to the recently published DHLGH '*Nature Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, Water Sensitive Urban Design Best Practice Interim Guidance Document*' (November, 2021).

7.3 Environmental Assessments

The OPR states that the SEA report does not include any analysis or discussion of the Council's deliberations of the Draft Plan prepared by the executive, or any analysis of the directions or motions of the Elected Members in the process of preparing the Draft Plan for public display.

Chief Executive's Response

The OPR comments regarding Chapter 11 are noted and welcomed.

7.2 Green Infrastructure and Nature Based Solutions

The Chief Executive concurs with the comments of the OPR and policy SI22 and Appendix 12 are updated accordingly.

7.3 Environmental Assessments

The comments of the OPR are noted. The CE will ensure that the iterative and transparent nature of the analysis of decision-making process of the material amendments and their assessments will be described in the updated Environmental Report. In addition, the environmental baseline and environmental references in the Environmental Report will be updated, where appropriate, to take account of information provided in the submissions. The CE will also give due regard to the Strategic Environmental Assessment (SEA) Guidelines for Regional Assemblies and Planning Authorities which were adopted on the 8th March 2022.

Chief Executive's Recommendation

No change to the Plan with respect to Chapter 11 or the SEA or AA.

7.2 Green Infrastructure and Nature Based Solutions

Chapter 9

Section: 9.5.4 Surface Water Management and Sustainable Drainage Systems (SuDS)

Page: 328, Policy SI22

Amendment:

Policy SI22 Sustainable Drainage Systems

To require the use of Sustainable Drainage Systems (SuDS) in all new developments, where appropriate, as set out in the Greater Dublin Strategic Drainage Study (Vol 2: New Development)/ Greater Dublin Regional Code of Practice for Drainage Works **{and having regard to the guidance set out in Nature Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, Water Sensitive Urban Design Best Practice Interim Guidance Document (DHLGH, 2021)}**. Sustainable Drainage Systems (SuDS) should incorporate nature-based solutions and be designed in accordance with the Dublin City Council Sustainable Drainage Design and Evaluation Guide (2021) which is summarised in Appendix 12. SuDS should protect and enhance water quality through treatment at source while enhancing biodiversity and amenity.

Appendix 12 Technical Summary of Dublin City Council Sustainable Drainage Design and Evaluation Guide (2021)

Section: 1.0 Introduction

Page: 356, National Policy

Amendment:

National Policy

- National Biodiversity Action Plan 2017– 2021
- **{Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas Water: Sensitive Urban Design Best Practice Interim Guidance Document (2021)}**

8. Implementation and Monitoring

Summary

The Office commends the approach set out in Table 16-1 which includes indicators such as the number of residential units constructed in SDRAs and carbon reduction that are specific, measurable, achievable, and realistic consistent with what is advocated for within the recently published *Development Plans Guidelines for Planning Authorities, Draft for Consultation*.

Chief Executive's Response

The OPR comments regarding the implementation and monitoring chapter are noted.

Chief Executive's Recommendation

No change to Draft Plan.

9. General and Procedural Matters

Summary

9.1 Mapping

The OPR states that it would welcome the inclusion of online interactive mapping which allows for the inclusion of multiple layers of mapping to be presented in a user-friendly manner with clear visual representation of what the development Plan comprises and provides a greater understanding of its spatial impact.

The following Observation is made:

Observation 2 – Mapping

The Planning Authority is requested to review the land use zoning maps to provide greater clarity with respect to the policy objectives set out in the Plan and how their implications are presented spatially. Specifically, the Planning Authority should ensure the following:

- (i) the alignment of the Local Area Plan boundaries and the Strategic Regeneration Development Areas boundaries;
- (ii) clearly identify the existing and proposed strategic transport projects and cross reference these projects with the written text and policies set out in the Draft Plan;
- (iii) ensure the land use zoning maps are overlaid with the flood maps prepared in the Strategic Flood Risk Assessment in order to clearly outline sites at risk of flooding; and
- iv) the *Development Plans Guidelines for Planning Authorities, Draft for Consultation* (August 2021) (Section 2.7.2) provides a useful reference for development plan mapping.

9.2 School Sites

The Office notes the policies and objectives outlined in the Draft Plan in relation to the provision of lands for educational purposes are generally in accordance with *The Provision of Schools and the Planning System: A Code of Practice for Planning Authorities* (2008).

The following observation is made:

Observation 3 – School Sites

Having regard to the urban nature of the Plan area, and the level of population change envisaged for some of the larger SDRA areas in particular, the Planning Authority is requested to include a policy to retain and protect existing school sites within the Plan area unless it has been determined in agreement with the Department of Education that the use of the site for school provision is no longer required.

Chief Executive's Response

9.1 Mapping

Observation 2 – Mapping

(i) the alignment of the Local Area Plan boundaries and the Strategic Regeneration Development Areas boundaries;

As noted above, LAP boundaries have been reviewed and corrected on all zoning maps.

(ii) clearly identify the existing and proposed strategic transport projects and cross reference these projects with the written text and policies set out in the Draft Plan;

As noted above, Map K will be updated to indicate the alignment of the SDRAS's with existing and proposed public transport infrastructure.

(iii) ensure the land use zoning maps are overlaid with the flood maps prepared in the Strategic Flood Risk Assessment in order to clearly outline sites at risk of flooding; and

The OPR comments are noted and the SFRA has been updated to include relevant extracts of the flood maps overlaid with the zoning maps.

9.2 School Sites

Observation 3 – School Sites

The CE acknowledges the strategic importance of schools and educational facilities as essential community and social infrastructure. The preservation of existing educational sites for ongoing use, consolidation and development is essential to ensure adequate facilities to serve the future needs of the city and is supported by the Department of Education. In this context, the Draft Plan includes a new zoning objective - Community and Social Infrastructure – Zone Z15 Land-Use Zoning Objective Z15: To protect and provide for community uses and social infrastructure. A number of schools in the city are proposed to be rezoned Z15 under the Draft Plan.

The importance of schools and educational facilities is further addressed in chapter 5 of the Plan under section 5.5.8 Social and Community Infrastructure. QHSN51 and QHSN52 specifically address Education Provision and Shared Use of Educational Facilities. Objectives QHSNO14 and QHSNO15 are also of relevance and give a clear commitment to continue to work with the DES to assess the need and demand for new educational facilities and to reserve lands appropriate for educational purposes.

The CE concurs with the recommendation, that this existing range of policies and objectives could be further enhanced and augmented. In this regard, an amendment to Policy QHSN51 is proposed.

Chief Executive's Recommendation

9.1 Mapping

Observation 2 – Mapping

Mapping amendment: SFRA mapping to be updated to include flood maps overlaid with zoning maps.

9.2 School Sites

Observation 3 – School Sites

Chapter 5

Section: 5.5.8 Social and Community Infrastructure, subsection Schools and Education

Page: 195, Policy QHSN51

Amendment:

Policy QHSN51 Education Provision

- (i) To support the provision of new schools and the expansion of existing school facilities having regard to the requirements of the DES.
- (ii) {To protect and retain the entire curtilage of existing schools' sites, including buildings, play areas, pitches and green areas, that may be required for the expansion of school facilities in the future, unless it has been determined in agreement with the Department of Education that the use of the site for school provision is no longer required}.
- (iii) To support the ongoing development and provision of third level education, further education and lifelong learning in the city.

Submission: National Transport Authority

Submission No: 1821

Summary of the Observations, Submissions and Recommendations of the National Transport Authority

Introduction

Under Section 12 (4) of the Planning and Development Act 2000, as amended, the Chief Executive's Report must summarise the issues and recommendations raised by the National Transport Authority (NTA), and outline the recommendations of the Chief Executive in relation to the manner in which those issues and recommendations should be addressed in the Development Plan.

The submission of the NTA has been reviewed and the Chief Executive sets out below a summary of the substantive issues raised followed by the response and recommendation of the Chief Executive. For ease of reference, the same heading structure set out in the submission is used.

Overview

Summary

The NTA comments on the consistency of the Draft Development Plan with the Transport Strategy for the Greater Dublin Area 2016-2035 (2016 Strategy) and the Draft Greater Dublin Area Transport Strategy 2022-2042 (2022 Strategy) and notes that at the strategic level, the Draft Development Plan has endeavoured to include the multiple recommendations made by the NTA at the pre-draft stage. The NTA sets out that Climate Change and Recovery from the COVID-19 Pandemic are the primary challenges for the city from an integrated land use and transport perspective.

The NTA highlights that it is imperative that Dublin City Council supports, protects and facilitate the progress of the major transport infrastructure projects that are being brought forward for construction and/or delivery during the Development Plan period, including: DART+, Metrolink Charlemont to Swords, 12 BusConnects Core Bus Corridors, and Luas to Finglas.

The NTA states that it will endeavour throughout the period of the Development Plan to expedite the delivery of all sustainable transport projects in Dublin City, with the cooperation of the City Council and other agencies, and look forward to the emergence of a transformed urban mobility culture in the coming years.

Chief Executive's Response

The comments of the NTA are noted. The Chief Executive welcomes the comments of the NTA regarding the content of the Plan.

The significant importance of Strategic Transport Projects is acknowledged throughout the Plan with a suite of policies and objectives aimed at activating sites and facilitating the ongoing consolidation of the city to create long-term sustainable housing and communities in the city.

Chief Executive's Recommendation

As per response to individual NTA recommendations/observations – see below.

Chapter 1 Strategic Context and Vision

Summary

NTA recommends slightly revised text to replace paragraph 1.9.7 in reference to transport projects. The NTA highlights that similar reference corrections should be made throughout the written statement and appendices when referencing these transport projects.

Chief Executive's Response

The Chief Executive recommends that the text is updated generally in accordance with the NTA submission.

Chief Executive's Recommendation

Chapter 1

Section: 1.9.7 NTA Transport Strategy 2016-2035

Page: 46

Amendment:

This strategy for the Greater Dublin Area (GDA) provides a framework for a sustainable transport network for the long term. ~~(Three k)~~ {K}ey projects include:

- ~~• (The Bus Connects project with a targeted timeline of 2021 – 2023.~~
- ~~• The extended Luas Tram line to Finglas anticipated to be delivered by 2028.~~
- ~~• Metro train line from the city to Dublin Airport and Swords with a targeted delivery date of between 2021 and 2027.)~~
- {MetroLink from Charlemont to Swords via Dublin Airport, with construction date due to commence during the Development Plan period;
- The Bus Connects programme which includes the following:
 - Dublin Area Bus Network Redesign which provides for significantly enhanced bus services, with a completion by 2024 and
 - The Core Bus Corridor Projects which will provide bus priority on the radial routes, with a completion date by 2030;
- DART+ Programme, with construction to commence during the Development Plan period and
- Luas Finglas with a Railway Order due to be submitted by 2023.}

~~(Over the course of the development plan, it is expected that these key infrastructural projects will either be delivered or be at an advanced stage of design/planning).~~ The alignment of future growth and key public transport infrastructure is a key consideration of the Plan.

Chapter 2 Core Strategy

Summary

The NTA supports the broad thrust of the Core Strategy and is supportive of brownfield and infill development at any locations within Dublin City. The NTA notes that there is no reference to the City Edge project and that the Draft Development Plan references the Naas Road SDRA exclusively. The NTA recommends that specific reference is made throughout the Development Plan where appropriate to the emerging City Edge Masterplan.

Chief Executive's Response

This issue was raised by the OPR and the CE has recommended appropriate textual amendments to refer to the City Edge project in Chapter 2 and 13.

Chief Executive's Recommendation

To include text as per OPR submission and CE response.

Chapter 3 Climate Action

Summary

The NTA fully supports the Climate Action measures set out in the Draft Plan. The NTA recommends a policy is included within Section 3.5.1 which specifically provides for retro-fitting of existing built-up areas with measures which will contribute to meeting the objective of a low-carbon city, such as reopening closed walking and cycling links or providing new links between existing areas.

Chief Executive's Response

A similar issue was raised in the submission by EMRA. The Draft Plan under policy SMT11, page 286, supports the continued reallocation of space to pedestrians and the public realm to provide a safe and comfortable street environment for all ages and abilities. Under policy SMT13, page 287, it is the policy of the Council to manage city centre road space to best address the needs of pedestrians and cyclists. The Draft Plan also includes a range of policies (section 8.5.6) to support active travel and to work with relevant transport providers and agencies to facilitate the integration of active travel measures in the city. It is also an objective under SMT05, page 287, to review the City Centre Transport Study 2016 over the life of the Plan and this issue will be examined further through this study. Where applicable, review of pedestrian permeability and cycle links are carried out as part of the development management process. In this regard, it is considered that the Draft Plan adequately addresses the matter and additional policy is not required.

Chief Executive's Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Chapter 4 Shape and Structure of the City

The NTA recommends that Chapter 4 is strengthened from a strategic transport perspective and suggests amendments to a number of policies.

Policy SC1 – Consolidation of the Inner City: The NTA states that emphasis should be placed on linking the Inner-City Development Areas with the outer city and suburbs beyond the City Council boundary by public transport, and walkability and cycling for the consolidation of residential development into the Inner City in the future.

Policy SC6 – Docklands: The connectivity of Dublin Docklands to the city as a whole should be emphasised.

SC7 – Dublin Port: Recommend that reference to enhancing connectivity Dublin Port and the wider city is required.

SC8 – Development of the Inner Suburbs: State that reference to public transport exclusively is too narrow a scope. Recommends that reference to cycling infrastructure and improvements to the walking environment are included. Recommends that the term ‘services’ replaces ‘infrastructure’ in reference to public transport.

SC9 – Key Urban Villages, Urban Villages and Neighbourhood Centres: Recommends an additional bullet point addressing the need to cater for movement by public transport between Key Urban Villages, Urban Villages and Neighbourhood Centres, and between all three types of settlements in the hierarchy and Dublin City Centre.

SC16 – Building Height Locations: The NTA is of the view that increased building height – insofar as it facilitates increased density and intensity of development in locations where public transport, walking and cycling are likely to cater for the majority of trips – is an important measure in contributing to a more sustainable city from a transport point of view. Recommends that the precise wording of this policy is reassessed, in particular, the reference to ‘established character’ and the potential for this to preclude taller buildings from areas appropriate of same, including SDRAs and Key Urban Villages.

Chief Executive’s Response

Policy SC1 – Consolidation of the Inner City: The CE considers that the Plan contains an extensive suite of policies to support public transport, walking and cycling including those set out under Chapter 8. It is considered that the issue raised by the NTA is addressed adequately elsewhere in the Plan and no amendment is proposed.

Policy SC6 – Docklands and SC7 Dublin Port: The CE acknowledges the submission made by the NTA and a minor textual amendment is recommended. Having regard to the textual amendment proposed to policy SC6, it is considered that no further amendment is required to Policy SC, as Dublin Port is located within the Docklands area.

Policy SC8 – Development of the Inner Suburbs: The CE recommends that the policy is updated to reflect the NTA’s comments.

Policy SC9 – Key Urban Villages, Urban Villages and Neighbourhood Centres: The CE notes that this policy specifically references the 15-minute city which is predicated on the concept of

accessibility particularly by sustainable modes. In this context, it is not considered that an additional textual amendment is necessary.

Policy SC16 – Building Height Locations: The CE considers that it is an important planning principle that the amenity and established character of an area is protected in any development proposal and that development does not have a significant adverse impact on same. It is not considered that the wording of policy SC16 would in any way prejudice the development of appropriate density and height in locations well served by public transport. The policy must be read in conjunction with Appendix 3 which sets out detailed guidance and performance criteria for assessing proposals of enhanced density and height. No further amendment is considered appropriate.

Chief Executive's Recommendation

Chapter 4

Section: 4.5.1 Approach to the Inner City and Docklands

Page: 139, Policy SC6

Amendment:

Policy SC6 Docklands

To recognise the distinctive character of the Docklands regeneration area and to work with the relevant authorities to increase connectivity with the city centre {and its environs}.

Chapter 4

Section: 4.5.2 Approach to the Inner Suburbs and Outer City as Part of the Metropolitan Area

Page: 140, Policy SC8 Development of the Inner Suburbs

Amendment:

Policy SC8 Development of the Inner Suburbs

To support the development of the inner suburbs and outer city in accordance with the strategic development areas and corridors set out under the Dublin Metropolitan Area Strategic Plan and fully maximise opportunities for intensification of infill, brownfield and underutilised land where it aligns with existing and pipeline public transport ~~(infrastructure)~~ {services and enhanced walking and cycling infrastructure}.

Chapter 5 Quality Housing and Sustainable Neighbourhoods

Summary

The NTA suggests amendments to a number of policies.

QHSN10 – 15-Minute City: States that policy could be strengthened by explicitly referencing the need to ensure that all new developments and all existing neighbourhoods will require extensive investment in public transport, walking and cycling infrastructure and supporting measures, including retro-fitting and reconfiguring of established urban streets, in order to realise the 15-minute city in Dublin.

QHSN11 – Neighbourhood Development: Recommends an additional bullet point which provides for the retro-fitting of pedestrian and cycle links into existing neighbourhoods.

The NTA note concerns regarding the preponderance of 1 bed and 2 bed apartment units, in many cases predominantly or exclusively of the Build-to-Rent tenure, located along public transport corridors, meaning that very few new family homes, new homes suitable for the elderly, or new homes for purchase, are being developed in locations where the need to use a private car is reduced by the availability of alternatives. The NTA outlines their support for policies and objectives aimed at expanding the market for highly accessible, medium-high density development to a wide range of potential household types such as those detailed under Section 5.5.7 – Specific Housing Typologies.

Schools and Education: Recommends an additional objective related to the layout and design of new schools and campuses or developments seeking to alter existing traffic arrangements at existing schools, specifically that drop-off zones will not be permitted as part of new school developments. Notes that reference to Safe Routes to School Design Guide (NTA, 2021), should be referenced in the Development Plan.

Chief Executive's Response

The CE welcomes the comments of the NTA which support the council's approach to BTR and housing mix.

The comments regarding the need for further emphasis on public transport and walking and cycling infrastructure are noted. The CE recommends that this is best addressed in a textual amendment to section 5.5.3. An additional objective regarding school design and layout is recommended under Chapter 8 (see below) and a further similar policy in Chapter 5 would be an unnecessary duplication.

Chief Executive's Recommendation

Chapter 5

Section: 5.5.3 Healthy Placemaking and the 15-Minute City

Page: 167-168

Amendment:

As outlined in the vision and introduction to the Plan, a core objective of the Plan is to promote the principle of the 15-minute city. The 15-minute city concept envisages that within 15 minutes on foot or bike from where they live, that people should have the ability to access most of their daily needs. **{In order to realise the 15-minute city, it is envisaged that all new developments and existing neighbourhoods will require extensive investment in public transport, walking and cycling infrastructure and supporting measures, including retro-fitting and reconfiguration of established urban streets, and the Council supports measures in this regard.}**

Chapter 6 City Economy and Enterprise

Summary

The NTA supports the policies and objectives of Chapter 6 as they will contribute to the consolidation of Dublin City and the associated greater use of public transport, walking and

cycling for trips to work, business trips and for travel to retail and other uses within the city. As per Chapter 2, The NTA recommends that specific reference is made to the emerging City Edge Masterplan and its potential consequences of its implementation on the spatial structure of Dublin City's economy in the medium to long-term.

Chief Executive's Response

The CE recommends a textual amendment to section 6.5.2 to address the comments of the NTA.

Chief Executive's Recommendation

Chapter 6

Section: 6.5.2 Strategic and Targeted Employment Growth

Page: 218

Amendment:

The overall approach to employment growth set out in this Plan reflects the RSES/MASP strategy in that it provides for the appropriate economic development of specific areas of the city such as: the City Centre, the Docklands, [{the Naas Road \(City Edge Project\)}](#), the Outer City and Key Urban Villages.

Chapter 7 The City Centre, Urban Villages and Retail

The NTA suggests a number of amendments to this chapter.

7.4 The Strategic Approach: Recommends the inclusion of a new point which states that the Council will facilitate the delivery of public transport infrastructure and services, and cycle infrastructure, in order to ensure that the economic, social and cultural attractions of the City Centre and Urban Villages can be supported, maintained and expanded by providing maximum accessibility by sustainable modes.

7.5.3 Key Urban Villages, Urban Villages and Neighbourhood Centres: The NTA recommends a policy which addresses the manner in which the Council will facilitate the delivery of public transport infrastructure and services, and cycle infrastructure, in order to ensure that the economic, social and cultural attractions of Urban Villages and Neighbourhood Centres can be supported, maintained and expanded by providing maximum accessibility by sustainable modes.

With regard to Policy CCUV19 – Parking and the Retail Core, the NTA recommends that this policy is retained in the Development Plan.

Chief Executive's Response

As detailed below, the Chief Executive recommends that additional text be added to section 8.5.5 and policy SMT12 to address the matter of the delivery of public transport infrastructure, cycle infrastructure etc. in the urban villages. In this context, additional policy in chapter 7 would be considered an unnecessary duplication.

Chief Executive's Recommendation

See response to Chapter 8 below.

Chapter 8 Sustainable Movement and Transport

Summary

The NTA supports the general approach to transportation as set out in Chapter 8 but suggests a number of amendments.

8.5.1 Addressing Climate Change through Sustainable Mobility: The NTA recommends that a caveat is added to Table 8-1 that the mode share targets apply to trips at a particular location at a specific time of day, rather than for all trips for the city as a whole.

Objective SMT01: Similar to Table 8-1, suggests a caveat regarding limitations of data informing mode share target recommended.

Policies SMT6 and SMT7 – Mobility Management and Travel Planning: The NTA recommends that a reference to NTA Guidance Workplace Travel Plans – A Guide for Implementers (NTA, 2013) and Toolkit for School Travel (NTA, 2019) is added to the policies in Ch. 8.

Objective SMT02 – Improving the Pedestrian Network: The NTA recommends that the removal of slip lanes is added in as a measure to improve the pedestrian network.

Section 8.5.5 – City Centre and Urban Villages - Access and Functional Needs: The NTA recommends a reference to facilitating the delivery of public transport infrastructure and services, and cycle infrastructure, in order to ensure that the economic, social and cultural attractions of these locations can be supported, maintained and expanded by providing maximum accessibility by sustainable modes is added.

Objective SMT05 – Review of the City Centre Transport Study: The NTA welcomes the inclusion of SMT05, and recommends that a reference to the role of the NTA in this review is added, along with reference to the major public transport projects (DART+, MetroLink and BusConnects) and the GDA Cycle Network Plan.

Policy SMT19 – Walking and Cycling for School Trips: The NTA recommends policy is updated and/or augmented having regard to the 2022 Strategy Measures relating to school layout and design with regard to walking, cycling and public transport and the Safe Routes to School Design Guide (NTA, 2021).

Policy SMT20 – Key Sustainable Transport Projects: Whilst policy is considered consistent with the 2016 Strategy, the NTA recommends that the policy is amended to provide increased statutory support for identified major public transport projects. It is recommended that specific policies for each of the major transport infrastructure project / programme which emphasises the support of the delivery of these projects and their protection in development management process.

Objective SMT014 – Additional Rail Stations: The NTA recommends that this objective is redrafted to account for the development of a DART / Metro Interchange at Cross Guns. It is noted that the stations to be provided as part of DART+ within Dublin City are Glasnevin (MetroLink), Spencer Dock, and Heuston West.

Objective SMT023 – Road, Street and Bridge Schemes: The NTA note and support an additional pedestrian/cycle bridge in the Docklands between the Samuel Beckett Bridge and the Tom Clarke Bridge. It is noted that recent analysis work undertaken for the DART+ Tunnel has identified options for its alignment which would not preclude the delivery of a river crossing at

any location between the two existing bridges. Furthermore, the relocation of Docklands rail station to Spencer Dock, when viewed in the context of on-going development in the eastern end of the SDZ, is likely to add to the demand for pedestrian movement across the River Liffey in this general location. As such, the NTA supports an approach to providing an additional pedestrian and cycle crossing in accordance with emerging demand for movement in the SDZ.

Section 8.5.8 Car Parking - The NTA fully support all policies and objectives which aim to reduce the level of parking generally in Dublin City, in particular SMT019. It is stated that any radical reduction in parking provision for residents of future developments in any non-central areas should be considered in the context of potential impacts on the surrounding neighbourhood.

Appendix 5 – Transport and Mobility: Technical Requirements – 4.0 Car Parking Standards: The NTA welcomes the retention of maximum car parking standards across Dublin City and the application of zero car parking for many land-uses in Zone 1. It is noted, however, that the Draft Development Plan does not specify instances in which car-free residential developments may be considered or where significantly reduced levels of parking may be appropriate. The NTA recommends that the Development Plan identifies specific locations within central Dublin (inside the canals and at public transport hubs) where car free residential developments or developments or where a standard below 0.5 per dwelling unit, may apply in principle, subject to a demonstration that this would not adversely affect surrounding residential communities or lead to reduced personal mobility for future occupants.

Chief Executive's Response

Section 8.5.1 Addressing Climate Change through Sustainable Mobility: The NTA comments regarding the mode share targets and their limitations in regards to location and time of day are noted. The CE recommends that a note is added to Table 8-1 to clarify information source and scope.

The CE recommends no change to Objective SMT01. The existing mode shares are based on the Canal Cordon Count and it is proposed to add a clarification to Table 8-1 in this regard. However, the Target Mode Share as outlined in Table 8-1 and Policy SMT01 are considered applicable to the city as a whole.

Policies SMT6 and SMT7 – Mobility Management and Travel Planning: Reference to the relevant NTA Guidance documents is included within the Development Plan and is referenced in Appendix 5, section 2.3 Mobility Management and Travel Planning. In this context, the CE recommends no change to policies SMT6 and SMT7 as this would be unnecessary duplication.

Objective SMT02 – Improving the Pedestrian Network: The Chief Executive agrees with the submission of the NTA and recommends changes to the wording of policy SMT02 to include aspirations to remove slip lanes to improve the pedestrian network.

Section 8.5.5 – City Centre and Urban Villages - Access and Functional Needs: The Chief Executive notes the issue raised by the NTA and recommends that additional text be added to section 8.5.5 and policy SMT12.

Objective SMT05 – Review of the City Centre Transport Study: The Chief Executive welcomes the support of the NTA regarding Policy SMT05 and an additional reference to collaboration with the NTA is recommended. Reference to the major public transport projects (DART+, MetroLink and BusConnects) is addressed in proposed amendments to policy SMT20.

Policy SMT19 – Walking and Cycling for School Trips: The Chief Executive agrees with the importance of facilitating increased permeability and safe school routes for walking and cycling to schools. Additional wording relating to school layout and design in regards to walking, cycling and public transport is recommended.

Objective SMT20 – Key Sustainable Transport Projects: It is not considered necessary to include separate policies for each of the identified major public transport projects, which are all national projects identified within the Transport Strategy for the Greater Dublin Area (GDA) 2016-2035 and the forthcoming review, within the Development Plan. However, the CE recommends that additional text to emphasis the Council's support in delivering these projects as per NTA recommendation is added to SMT20. See response to OPR submission for detail.

Objective SMT014 – Additional Rail Stations: The Chief Executive notes the NTA recommendation and revised wording to policy SMT014 to take account of interchange developments under DART+ and Metro is recommended.

Objective SMT023 – Road, Street and Bridge Schemes: The Chief Executive welcomes the NTA's support of an additional pedestrian/cycle bridge in the Docklands between the Samuel Beckett Bridge and the Tom Clarke Bridge.

Section 8.5.8 – Car Parking: The Chief Executive welcomes the NTA's support of all car parking policies and objectives and the Council's aim to reduce the level of parking generally in Dublin City.

Appendix 5 – Transport and Mobility: Technical Requirements – 4.0 Car Parking Standards: The Chief Executive confirms that developments are assessed on a site by site basis. Appendix 5, Section 4.0, outlines maximum car parking standards which provides a framework for such assessment. It is not considered appropriate to set out prescriptive guidance on locations where car-free residential developments may be considered or where significantly reduced levels of parking may be appropriate. However, in recognition of proximity to the City Centre, active travel infrastructure and access to public transport options, it is recommended that Zone 1 could accommodate a reduced upper ceiling limit on parking standards for residential use and an amendment is recommended in this regard.

Chief Executive's Recommendation

Chapter 8

Section 8.5 Policies and Objectives, Subsection 8.5.1 Addressing Climate Change through Sustainable Mobility, Table 8-1 Current and Target Mode Share Page: 278

Amendment:

Table Content:

Current Mode Share {*}

Public Transport (bus, rail, LUAS) 57%*{*}

Table Note:

{*Current mode share figures are based on the NTA/DCC Canal Cordon Counts (November 2019) and present a picture of the modes of travel used by people travelling across the Canal Cordon into the City in a typical AM peak period.}

{*}The modest increase in public transport mode share anticipates the construction of major public transport infrastructure that is proposed to occur over the lifetime of the plan. The impact of public transport infrastructure projects on mode share is more likely to come into fruition during the lifespan of the following plan.

Chapter 8

Section 8.5 Policies and Objectives; Subsection 8.5.4 Accessibility for All; SMT02

Improving the Pedestrian Network

Page: 285

Amendment:

Objective SMT02 Improving the Pedestrian Network

To improve the pedestrian network{ } ~~(and)~~ {including measures such as the removal of slip lanes, the} introduction of tactile paving, ramps and kerb dishing at appropriate locations, including pedestrian crossings, taxi ranks, bus stops and rail platforms in order to optimise accessibility for all users.

Chapter 8

Section 8.5 Policies and Objectives; Subsection 8.5.5 City Centre and Urban Villages - Access and Functional Needs; Subsection Urban Villages

Page 286

Amendment:

The importance of the urban villages as the heart and focus for communities is recognised and supported by this plan. Their role in contributing to the 15-minute city is crucial through their ability to provide a hub of services, facilities and amenities for the population within a 15-minute walking catchment. Dublin City Council is committed to improving connectivity to the urban villages, alongside improvements to the public realm and encouraging more active travel within these communities. {Dublin City Council will facilitate the delivery of public transport infrastructure and services, and cycle infrastructure, in order to ensure that the economic, social and cultural attractions of these locations can be supported, maintained and expanded by providing maximum accessibility by sustainable modes.}

Chapter 8

Section 8.5 Policies and Objectives; Subsection 8.5.5 City Centre and Urban Villages - Access and Functional Needs; SMT12 Urban Villages and the 15-Minute City

Page: 287

Amendment:

Policy SMT12 Urban Villages and the 15-Minute City

To support the role of the urban villages in contributing to the 15-minute city through improvement of connectivity, in particular for active travel {and facilitating the delivery of public transport infrastructure and services.} and public realm enhancement.

Chapter 8

Section 8.5 Policies and Objectives; Subsection 8.5.5 City Centre and Urban Villages - Access and Functional Needs; SMT05 Review of the City Centre Transport Study
Page: 287

Amendment:

Objective SMT05 Review of the City Centre Transport Study

To review the City Centre Transport Study 2016 {in collaboration with the NTA} in the lifetime of the plan, setting out a clear strategy to prioritise active travel modes and public transport use, whilst ensuring the integration of high-quality public realm

Chapter 8

Section 8.5 Policies and Objectives; Subsection 8.5.6 Sustainable Modes; Subheading Active Travel and Schools;
Page: 292

New Policy to be inserted after SMT19 Walking and Cycling for School Trips. Subsequent numbering to be amended accordingly.

Amendment:

{Policy SMT 20 Accessibility and Design at Schools}

To ensure that the development of new schools or expansion of existing schools demonstrate accessibility by sustainable transport options and that the layout and design shall be optimised to prioritise permeability and safe routes for pedestrians and cyclists.}

Chapter 8

Section 8.5 Policies and Objectives; Subsection 8.5.6 Sustainable Modes; Subheading Public Transport; SMT014 Additional Rail Stations
Page: 295

Amendment:

Objective SMT014 Additional {Interchanges and} Rail Stations

- (i) To promote and seek the development of a new ~~(commuter rail)~~ {interchange} station at Cross Guns {Glasnevin} ~~(serving the existing rail line infrastructure and)~~ {,subject to environmental requirements being satisfied and appropriate planning consents being obtained, as part of the DART+ and Metro link projects}, ~~(preferably as part of a larger mixed use development.)~~

Volume 2:

Appendix 5 Transport and Mobility: Technical Requirements

Section 4.0 Car Parking Standards; Table 2 Maximum Car Parking Standards for Various Land Uses

Page 263

Amendment:

| Category | Land-Use | Zone 1 | Zone 2 | Zone 3 |
|---------------|--|----------------------|---------------------|---------------------|
| Accommodation | Hotel ¹ | None | 1 per 3 rooms | 1 per room |
| | Nursing Home Retirement Home | 1 per 3 residents | 1 per 2 residents | 1 per 2 residents |
| | Elderly Persons Housing Sheltered Housing | 1 per 4 dwellings | 1 per 2 dwellings | 1 per 2 dwellings |
| | Student Accommodation | None ² | 1 per 20 bed spaces | 1 per 10 bed spaces |
| | Houses Apartments/ Duplexes | 4 {0.5} per dwelling | 1 per dwelling | 1 per dwelling |

Chapter 13 Strategic Development Regeneration Areas (SDRAs)

Summary

The NTA recommends that Chapter 13 is reviewed as the requirements for access at the strategic level and at the local level are not highlighted to the extent required. It is considered that city-wide policies and objectives should be transposed to this more local scale and that the imperative for transport investment to support the policies and objectives governing the planning of these areas is not clearly reflected. The NTA state that Ch. 13 should be reviewed to address the relationship between the development of the SDRAs and the provision of public transport infrastructure and services, and active travel facilities.

Chief Executive's Response

Similar comments were raised by the OPR and are addressed comprehensively in the CE's response to their submission. The CE has recommended that a further table is added to Chapter 13 to further detail the alignment between the SDRA's and strategic public transport infrastructure. Furthermore, it is recommended that Map K is updated to details existing and proposed public transport connections and their spatial relationship to the SDRA's.

Chief Executive's Recommendation

As per response to OPR.

Other Matters

The NTA raises the following miscellaneous matters.

- Recommends that a specific objective is included in the Development Plan that states that permission for major developments (>100 units for example) will only be granted by the City Council, once a full audit of the walking and cycling facilities in the environs of a development is undertaken and a programme for investment in any improvements is developed and agreed with all parties, including the levying of Section 48 development contributions which would part-fund this infrastructure.

- Suggests inclusion of a policy or objective regarding cooperation between Dublin City Council and the NTA to facilitate the increased demand for bus layover and depots to meet with bus fleet expansions and recognise the potential impact on land use development.
- Southern Port Access Route: The NTA recommends that Dublin City Council confirm, in consultation with TII, the requirements for the delivery of the Southern Port Access Route, and incorporate same into the Draft Development Plan by way of policies and objectives, and on any relevant mapping.

Chief Executive's Response

The Chief Executive agrees that improvements in infrastructure should be provided in tandem with new developments. The City Council operates an approved S48 Development Contribution Scheme on a city-wide basis. Approximately 25% of the levy is used for roads and public realm improvements including walking and cycling and a further 20% allocated to urban regeneration. There is also additional S48 schemes for development adjacent to the Luas lines.

Planning applications for large development are accompanied by Mobility Plans which enables the City Council to identify the local improvements required to the adjacent public realm. Section 48 schemes are reviewed periodically by the City Council. It is not considered necessary to include a policy for additional S48 requests on sites where schemes of over 100 units are proposed.

The Chief Executive acknowledges the additional infrastructure requirements generated by Bus Connects and general improvements to bus services within the City. DDC will work with the NTA to incorporate bus infrastructure within new large-scale developments where appropriate. A new objective to address this is recommended.

The Chief Executive welcomes the additional comments by the NTA. Reference to the requirement for the delivery of the Southern Port Access Route is noted and it is recommended that the existing policy should be expanded to reflect the draft NTA GDA Transport Strategy 2022-2042.

Chief Executive's Recommendation

Chapter 8

Section 8.5 Policies and Objectives; Subsection 8.5.6 Sustainable Modes; Subheading Public Transport;

Page: 295

New Objective to be inserted after SMT014 Additional Rail Stations. Subsequent numbering to be amended accordingly.

Amendment:

{Objective SMT015 Bus Infrastructure

DCC will work with the NTA to incorporate bus infrastructure within new large-scale developments where appropriate.}

Chapter 8

Section 8.5 Policies and Objectives; Subsection 8.5.6 Street/Road, Bridge and Tunnel Infrastructure; SMT 28 National Roads Projects

Page: 300

Amendment:

Policy SMT 28 National Road Projects

To protect national road projects as per the NTA {Transport} Strategy for the Greater Dublin Area 2016 – 2035 and its review including the provision of a ~~(Southern Port Access Route to Poolbeg)~~ {new road which links from the national road network at the Dublin Tunnel to serve the south port lands and adjoining areas. The indicative alignment of this road link is shown on Map J.}

Part 3: Summary of Submissions & the Chief Executive's Response & Recommendations

Volume 1 Written Statement

Chapter 1: Strategic Context and Vision

Chapter 1: Strategic Context and Vision

Submission Number(s):

0003, 0006, 0007, 0008, 0017, 0018, 0031, 0063, 0101, 0121, 0168, 0314, 0337, 0338, 0347, 0364, 0366, 0414, 0550, 0551, 0554, 0592, 0642, 0673, 0743, 0757, 0775, 0782, 0830, 0853, 0876, 0888, 0890, 0905, 0925, 0940, 1006, 1008, 1019, 1021, 1048, 1055, 1056, 1075, 1077, 1094, 1122, 1137, 1193, 1194, 1207, 1238, 1271, 1281, 1284, 1298, 1307, 1310, 1353, 1386, 1388, 1397, 1406, 1413, 1448, 1454, 1477, 1482, 1483, 1495, 1507, 1523, 1536, 1553, 1576, 1605, 1636, 1645, 1662, 1682, 1694, 1697, 1698, 1700, 1704, 1721, 1733, 1750, 1755, 1757, 1762, 1763, 1770, 1772, 1785, 1797, 1803, 1811, 1817, 1819, 1826, 1832, 1834, 1849, 1850, 1851, 1853, 1858, 1876, 1882, 1884, 1892, 1959, 1960, 1961, 1971, 1973, 2063, 2072, 2086, 2087, 2094, 2095, 2096, 2109, 2111, 2112, 2114, 2116, 2119, 2120, 2121, 2124, 2125, 2127, 2129, 2133, 2139, 2147

Section 1.1 Introduction

Summary

Many submissions give a broad welcome to the plan generally, with some citing that the aspiration to create a city which is environmentally sustainable, socially inclusive and culturally vibrant is wholeheartedly supported.

A number of submissions, including one from the Grangegorman Development Agency, request updated references to Technological University Dublin as TU Dublin, and proposals to date at the Grangegorman campus.

A large number of submissions reference the Poolbeg West SDZ and the south docklands more generally. These submissions relate to contents of the SDZ, implementation issues arising from the SDZ and issues on the wider Poolbeg peninsula and neighbouring coastal communities of Ringsend, Irishtown, and Sandymount.

Some issues raised within the above submissions include the timing and delivery of the Dodder bridge and Luas link to the Poolbeg peninsula; concerns regarding the implications of climate change on flooding in the area; compatibility with environmental designations of Dublin Bay; opposition to the Dublin Port 3FM Project expansion plans; and opposition to the inclusion of industrial port related facilities and high - rise facilities within the SDZ area. Concerns are also raised in submissions regarding development of the Irish Glass Bottle site in regard to noise, traffic volumes, height and the delivery of social and affordable housing. Issues raised in submissions regarding the environs of Poolbeg West SDZ include the impacts of dredging works in Dublin Port/Bay on beaches, designation of the Strand area as a public recreation zone, Irish Water to urgently provide additional WWTP facilities to serve the city and the City Council to step up its program of drain cleaning to minimise flood risk.

A number of submissions are made on this chapter which raise issues in regard to other chapters of the Draft Plan and are addressed elsewhere under the relevant chapter of this CE Report.

Chief Executive's Response

The CE notes the request by the Grangegorman Development Agency for an additional description of the progress to date on site, however, the purpose of Section 1.1 is to briefly

identify significant city infrastructure that have been progressing since the last Development Plan. It is proposed to update the SDRA section (Chapter 13) The CE's response to updating references to the TU Dublin campus with the correct title of TU Dublin throughout the Draft Plan is addressed under Chapter 4.

The future development of Poolbeg is fully addressed under the Poolbeg West SDZ Planning Scheme approved by An Bord Pleanála in 2019. This is a separate statutory plan to the Dublin City Development Plan and the Planning Scheme was subject to a comprehensive environmental assessment that included a strategic flood risk assessment and related environmental matters. Other matters raised regarding Poolbeg are addressed under the CE response to Chapter 4.

Section 10.5.6 of the Draft Plan, page 375, provides policies and objectives supporting the protection of the coast, Dublin Bay UNESCO Biosphere and beaches with a focus on balancing both the recreational needs of the users and environmental needs of the area given the Natura 2000 status of much of Dublin Bay and its coastal environs.

Chief Executive's Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Section 1.2 Strategic Approach – Achieving a Sustainable, Climate Resilient Dublin

Summary

Many submissions support Section 1.2 including from the National Council for the Blind in Ireland (NCBI) regarding the strategic principle of developing a more compact city and support from residential groups regarding developing a low carbon, sustainable and climate resilient city. A number of submissions also support the strategic principles in regard to urban form and creating a more compact city with a network of sustainable neighbourhoods aligned with the principle of the 15-minute city.

A number of submissions raise concerns regarding adequate community and civic infrastructure provision with calls for more public water fountains, public toilets, public bins, public seating, green spaces and longer pedestrian green light crossings. Submissions also raised concerns regarding the economic strategic principle and a focus on international business and tourism. Submissions are also made on the need to change the DCC Development Contribution Scheme.

A number of submissions seek the addition of a new principle on affordable and sustainable housing, stating the goal of ending the housing crisis and creating a more sustainable housing system in Dublin, with substantially increased provision of social and affordable housing. A submission also requests a new strategic principle for an accessible city using the principle of universal design to ensure that all parts of the public realm are accessible by all to the greatest extent.

Chief Executive's Response

The CE acknowledges support for the strategic principles. The provision of civic amenities including public seating and public toilets are addressed under objectives CCUVO19 Civic Amenities (page 266) and CCUVO14 City Centre Public Realm Strategy (page 265) in Chapter 7

of the Draft Plan. The length of pedestrian green light crossings is a matter outside the scope of the Development Plan and is an operational matter for the Transportation Department.

The strategic economic principle outlined in Section 1.2 seeks to continue to develop Dublin as the engine of the Irish economy and the national gateway at the heart of the Dublin region aligns with the objectives of the National Planning Framework.

The Development Contribution Scheme is a separate statutory document and is outside the scope of the Draft Plan.

Section 5.3 of the Draft Plan details the many interlinked issues facing the housing supply needs in Dublin City and Section 5.5.6 (page 181) provides policies for social, affordable purchase and cost rental housing. While it is acknowledged that there is a growing need for more social and affordable units, other forms of housing including housing for older people, people with disabilities, Traveller accommodation and provision of refuges and emergency accommodation all form part of the housing needs of the city. The current wording of the strategic social/residential principle in Section 1.2 is considered adequate as it captures social inclusion, choice of housing tenure and housing typologies in this brief strategic principle, with a detailed chapter on housing and sustainable communities provided in Chapter 5.

The Draft Plan provides a range of policies to support and promote an accessible and inclusive public realm in accordance with the principles of Universal Design, in particular Policy CCUV38 High Quality Streets and Spaces (page 264), Policy QHSN15 Accessible Built Environment (page 174) and Section 15.4.4 Inclusivity and Accessibility.

Consultation, design, procurement and management on the implementation of public realm projects is an operational matter and outside the scope of the Development Plan.

Chief Executive's Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Section 1.3 The Vision for Dublin

Summary

A large number of submissions support the vision for the city, particularly the focus on a low carbon and sustainable city incorporating the 15-minute city concept. A submission refers to the language of the vision as unrealistic and another submission states that the six-year timeframe for the Development Plan is not strategic. A number of submissions raise concerns regarding the timing of public transport projects that may impact on the vision for a low carbon and sustainable city and the achievement of a 2050 zero carbon city.

Other concerns raised in submissions include the loss of cultural spaces diminishing the cultural vibrancy of the city for citizens and tourists. A number of submissions query the aesthetic of the city and seek measures to improve its appearance. One submission wants the vision to put its citizens first and some submissions seek additions to the vision including reference to the circular economy as underpinning the vision for the city. TCD seeks that the word 'experience' should be changed to 'experience city living'. TU Dublin seeks that the vision gives emphasis to the social and cultural infrastructure of the city to enhance the quality of life and support sustainable development of existing, emerging, and diverse communities on the basis that there is limited reference in Chapters 1 and 2.

Chief Executive's Response

The CE welcomes the general support for the Vision set out in Chapter 1. Whilst the concerns raised are noted, the CE considers that the Draft Plan clearly sets out the ambition for the city envisaged for the future. The six-year timeframe for a development plan is set out under legislation. The vision however, is described with a ten-year horizon, echoing the stepping stone nature of each successive Development Plan that builds on the past to direct the future. This is clearly set out under Section 1.3. Moreover, the Vision incorporates culture and experience of living in a capital city.

The Climate Action Plan 2021 sets out a roadmap to deliver targets, updated annually, to achieving 51% reduction in Ireland's greenhouse gas emissions from 2021 to 2030, and to achieve net zero no later than 2050. These targets are not discretionary and, therefore, the Development Plan must be consistent with national policy. The implementation of public transport projects is a matter for the NTA and is outside the scope of the Development Plan.

Chapter 12 Culture of the Draft Plan provides policies and objectives to promote, protect and support existing and emerging new cultural spaces and in particular, proactively seeking new cultural spaces as part of the planning application process as set out under objectives CUO21 (Masterplans), CUO23 (Demolition or replacement of a use of cultural Venue), both page 448, CUO26 (Co-design and Audits), page 449 and CUO30 (Industrial Estate Regeneration Areas), page 451.

It is considered that the issue of the aesthetic of the city is addressed throughout the Draft Plan, in particular, the requirements under Section 15.4 Key Design Principles that includes Architectural Design Quality (Section 15.4.2) and the preparation of an Architectural Design Statement (Section 15.5.8) as part of planning applications.

It is considered that the current wording of the Vision encompasses the circular economy, social and cultural infrastructure and city living. The circular economy is addressed in more detail in Policy CA22, page 113 of Chapter 3, Chapter 9 and Chapter 15.

Chief Executive's Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Section 1.4 Statutory Context

Summary

A number of submissions oppose the Special Planning Policy Requirements (SPPRs) and seek the removal of the SPPRs from the Development Plan based on issues relating to cumulative impact on the community, undermining of meaningful public participation in the planning process, height related matters affecting existing communities and state that the role of the City Council has been seriously undermined by the imposition of the SPPRs. A submission requests that all planning applications are restored back to the Council for decision making including those for Strategic Housing Developments (SHD) on the basis of the diminution of design standards.

Chief Executive's Response

SPPR's are statements of national policy and are addressed under the CE response to Chapter 4.

Where any future amendments are made by the Department of Housing, Local Government and Heritage (DHLGH) to existing Section 28 Guidelines, Dublin City Council will implement accordingly. The Government, in line with their commitment to replace the SHD process, established a new application process (LRD) under the Planning and Development (Amendment) (Large-scale Residential Development) Act 2021 which came into effect in December 2021.

Chief Executive's Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Section 1.5 Strategic Environmental Assessment (SEA) / Appropriate Assessment (AA) / Strategic Flood Risk Assessment (SFRA)

Summary

There were a number of submissions, including from the Environmental Protection Agency (EPA), and the Office of Public Works (OPW) on Section 1.5 that raises issues regarding the three areas of environmental planning including Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA), all of which have dedicated volumes (Volumes 5, 6 & 7) in the Draft Plan.

Chief Executive's Response

The issues raised in these submissions are detailed in the CE Report under the sections regarding Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA).

Chief Executive's Recommendation

Please see CE Summary, Response and Recommendations regarding Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA).

Section 1.6 Housing Strategy, HNDA and Retail Strategy

Summary

A number of submissions raise issues on this section indirectly. One submission raises a concern that the housing target will not be met; a second submission seeks an explicit target to be set in the Draft Plan to increase the population in the city centre and a third submission comments that the HNDA has concluded that there is enough zoned land to meet housing need without the need to zone more land for housing.

Chief Executive's Response

The CE notes the concern raised regarding meeting the housing needs of the city. The Council has committed through various policies and objectives of the Draft Plan, including in Chapters 2, 5 and 13, to employ land activation measures to increase the supply of housing in the city, and monitor annual progress by way of identified City Performance indicators as set out in Chapter 16, Phasing and Implementation, Section 16.2.3. Both housing and population targets set for Dublin City Council are dictated at a national level and provided by EMRA at a regional level. These targets have been extrapolated by the Council to arrive at the population figure for the entire City Council area by 2028. Chapter 2, Core Strategy, Table 2-6 provides this information. There is sufficient land zoned to meet the demand for housing, all set out under Section 2.3.1 Land Capacity Assessment, Chapter 2, Core Strategy.

Chief Executive's Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Section 1.7 Plan Making Process and Consultation

Summary

A number of submissions raise issues regarding difficulties reading and understanding the Draft Plan, including its links to other documents, the overall length of the plan, accessibility of the language for those with literacy issues. Other submissions seek that letters are sent to all households explaining how they could get involved with the process.

Chief Executive's Response

Significant work was undertaken to enhance the accessibility of the Plan including the publication of National Adult Literacy Agency (NALA) and executive summaries at both pre-draft and draft stage. The length of the Plan to a large extent is dictated by the statutory requirements of the Plan, together with ensuring the font size used was legible to visually impaired persons.

The City Council used a wide variety of media to reach out to communities to engage with the process. A full summary of these measures is set out in the introduction of the CE report. It is considered that the public consultation process was comprehensive and engaging, demonstrated by the significantly high number of submissions received.

Chief Executive's Recommendation

No change is recommended.

Section 1.9.2 UN Sustainable Development Goals

Summary

A number of submissions request the inclusion of an objective that Dublin City Council will contribute to the achievement of the 17 Sustainable Development Goals (SDG's) of the United Nations 2030 Agenda for Sustainable Development, similar to other local authorities.

Chief Executive's Response

The SDG's are addressed under section 1.9.2 of the Draft Plan. Whilst the CE notes the submissions made, it is noted that the DCC Corporate Plan sets out a clear statement as to how the SDG's will be used to frame and guide the work of the council. It is considered, therefore, that this matter is most appropriately addressed at a corporate level, rather than through the Development Plan.

Chief Executive's Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Section 1.9.4 The National Climate Action Plan 2019 - 2024

Summary

A number of submissions seek an update to the heading of Section 1.9.4. There were also a number of calls to recognise the climate crisis as referenced in Dáil Éireann as an emergency, together with biodiversity.

Chief Executive's Response

The CE recommends that all references to the National Climate Action Plan 2021 are updated accordingly.

The matter of the declaration of a climate and biodiversity emergency is noted. In Chapter 10, Green Infrastructure, Section 10.3 references the 'biodiversity emergency' that was declared by Dáil Éireann in 2019.

Chief Executive's Recommendation

Chapter 1

Section: 1.4 Statutory Context

Page: 31, 3rd paragraph

Amendment:

The development plan and in particular, the Core Strategy (see Chapter 2) sets out the spatial framework for the city within the context of the National Development Plan (NDP), National Planning Framework (NPF), the National Climate Action Plan (CAP) ~~(2019-2024)~~ {2021}, the Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly (RSES) 2019, the NTA Transport Strategy {for the Greater Dublin Area} 2016-203~~(3)~~{5} and with the Specific Planning Policy Requirements (SPPRs) set out in the relevant Section 28 Ministerial Guidelines.

Chapter 1

Section: 1.9 Strategic Policy Context, Subsection 1.9.1, Figure 1-3: Key National, Regional and Local Planning Policy

Page: 37, first column, 2nd document listed

Amendment:

~~(Climate Action Plan 2019)~~ {National Climate Action Plan (CAP) 2021} and sectoral adaptation plans

Chapter 1

Section: 1.9.4 The National Climate Action Plan 2019-2024

Page: 40

Amendment:

1.9.4 The National Climate Action Plan ~~(2019-2024)~~ {2021}

The National Climate Action Plan (CAP) ~~(2019-2024)~~ {2021} (<https://www.gov.ie>), sets out a course of action to address the impacts of climate change on Ireland's environment, society, economic and natural resources. The CAP identifies the scale of the challenge and examines impacts on a range of key sectors including electricity, transport, built environment, industry and agriculture and charts a course towards ambitious emission reduction targets.

The CAP recognises the role that Project Ireland 2040 and the NPF can play in climate action in providing for population growth in a compact, connected and sustainable way and the key role that land use planning can play in progressing climate change mitigation and adaption.

~~(It is recognised that the Government intends to publish a new National Climate Action Plan in the near future. Dublin City Council will consider a variation of the development plan within a reasonable period of time to ensure that the development plan will be consistent with the overall approach to climate action set out in any new National Climate Action Plan.)~~

{The CAP provides a detailed framework which identifies how Ireland will achieve a 51% reduction in Ireland's overall GHG emissions from 2021 to 2030, and to achieve net-zero emissions no later than 2050. These legally-binding objectives are set out in the Climate Action and Low Carbon Development (Amendment) Act 2021.}

Section 1.9.6 Dublin Metropolitan Area Strategic Plan (MASP)

Summary

One submission stated the MASP ignores flood risk, in particular in the city centre and on the north-side.

Chief Executive's Response

The MASP is a specific spatial area of the wider EMRA area covered in the RSES, which is a separate statutory plan. A Regional Flood Risk Assessment was carried out as part of the preparation of the RSES on the EMRA spatial area. The aforementioned Regional Flood Risk assessment informed the Dublin City Council's Strategic Flood Risk Assessment which was

carried out for the development plan, a full copy of which is available as Volume 7 to the Draft Plan.

Chief Executive's Recommendation

No change is recommended.

Section 1.9.7 NTA Transport Strategy 2016 - 2035

Summary

A large number of submissions seek the inclusion of the NTA's Greater Dublin Area Cycle Network Plan, as a fourth project under Section 1.9.7. A number of submissions also seek inclusion of reference to the DART+ projects.

Chief Executive's Response

References to cycle lane expansion and DART+ upgrade projects are made in the opening paragraphs to this chapter, Section 1.1 page 24. Please see CE Summary, Response and Recommendations with respect to the NTA submission with regard to updated reference to public transport projects.

Chief Executive's Recommendation

See CE response to NTA submission.

Section 1.9.8 Strategic Planning Guidelines

See Section 1.4 above.

Other Matters

Proposed new Section 1.9.9 UN Convention on the Rights of People with Disabilities

Summary

One submission seeks an additional heading - UN Convention on the Rights of Persons with Disabilities - to be included in this chapter on the basis that Ireland ratified this Convention in March, 2018, and is currently pursuing its implementation through the National Disability Inclusion Strategy (NDIS) (2017-2022).

Chief Executive's Response

Proactive policies to support the rights of Persons with Disabilities are imbedded in the Draft plan including QHSN16 Accessible Built Environment, QHSN25 Dublin City Councils Strategic Plan for Housing people with a Disability 2016 and CCUV38 High Quality Streets and Spaces. In addition, there is extensive text throughout the Plan including Social Inclusion - page 172, Housing for People with Disabilities – page 177, Section 7.5.8 Public Realm - page 263, Section 15.4.4 Inclusivity and Accessibility – page 654.

The CE fully supports the right of equal access to information in accessible formats at the same time and point as everyone else. The final Development Plan document will be made available in a fully accessible format.

Chief Executive's Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Section 1.10 Implementation and Monitoring

Summary

A number of submissions are made on Section 1.10 and include issues regarding the need to focus on the delivery of the plan and support for public consultation in the decision-making process. Other submissions consider the Plan contained little guidance on cost, timelines and implementing agencies. It is stated that delivery is the most critical component of the Plan but requires a governance framework which goes beyond the existing PPN structures to include stakeholders across civil society including academia, business and education. It is considered that such an approach would promote greater citizen engagement and participation. Another submission seeks greater involvement of the community sector.

There are a number of submissions which detail a seven-point plan to be used as a pilot within the Dublin 8 area with DCC to lead, as a best practice model of engagement. A submission from the Oliver Bond Residents cites frustration at the limited, inconsistent nature of the existing planning and consultative practices operating throughout the city, especially by residents within the South-Central Area of Dublin 8.

There was a specific request by Irish Water for early engagement where works are being carried out in close proximity to Irish Water assets in order to minimise disruption to the public and where such works are to follow Irish Waters Standard Details and Codes of Practice, and Diversion Agreements.

Chief Executive's Response

The CE notes the comments in these submissions. Section 1.10 is a short summary on implementation directing readers to Chapter 16 Phasing and Implementation which provides detail on these matters including section 16.2 Collaboration and Engagement which in addition to the Public Participation Network (PPN), includes the Dublin City Local Community Development Committee and Comhairle na nOg as active partners. Dublin City Council is constantly evolving its engagement and collaboration techniques and, in this regard, with respect to the SDRA areas, is actively working towards developing a protocol that would encourage and promote official local monitoring committees anchored by DCC where residents, planners and developers can interact and communicate on large scale development projects - see Section 16.2 of the Draft Plan.

Progress on the Development Plan's policies and objectives are set out within the first two years of the plan and are accompanied by annual reviews of the City Performance Indicators identified under Section 16.2.3. Where timelines associated with policies and objectives can be given, these are set out throughout the Plan and otherwise such studies, reviews, audits, examinations etc. will be programmed and agreed following adoption of the Plan subject to adequate

resources including budgetary and financing matters. The CE also notes comments from Irish Water which will be addressed through development management.

Chief Executive's Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Other Issues

Summary

One submission seeks that tourism should have a dedicated chapter in the Development Plan and another wishes to make Sandymount an Autism and Neurodiversity-Friendly village, on a pilot basis.

A number of submissions are considered to fall outside the scope of the Development Plan and relate to matters of an operational or programming nature and/or involve third party landowners or other agencies. These include funding (in the context of environmental protection in the city, including flood defences and the Record of Protected Structures); signage (in the context of clearly demarcating Dublin City Council boundaries and neighbouring local authority boundaries); the expense of residential parking permits; cycling and public safety. A number of submissions related to public transport projects which are under the remit of the NTA. A further submission seeks a review of the motto of the city and the need for City Councillors and City Council officials to be trained in Sustainable Development Goals. Other submissions propose to adopt the term "sustainable" in the title of the Development Plan and the use of the Natural Capital Approach as an embedded overarching philosophy to the Development Plan.

Chief Executive's Response

It is considered that tourism is adequately addressed in Chapter 6, City Economy and Enterprise. Chapter 5, Quality Housing and Sustainable Communities includes a strong theme of health running through the chapter, Section 5.5.3 identifies Healthy Dublin City' which aligns with Healthy Ireland, designed to support and empower people in their environments to achieve their fullest health potential together with Social Inclusion addressed Section 5.5.4. This chapter fully acknowledges all levels of abilities.

All other matters are considered to be outside the scope of the Development Plan.

Chief Executive's Recommendation

No change is recommended.

Chapter 2: Core Strategy

Chapter 2: Core Strategy

Submission Number(s):

0003, 0005, 0006, 0253, 0339, 0340, 0590, 0594, 0609, 0673, 0743, 0804, 0826, 0830, 0853, 0887, 0888, 0934, 0939, 0982, 1005, 1011, 1017, 1029, 1038, 1048, 1075, 1137, 1153, 1176, 1187, 1194, 1197, 1281, 1298, 1306, 1353, 1383, 1386, 1397, 1406, 1413, 1420, 1421, 1430, 1436, 1477, 1492, 1493, 1511, 1553, 1562, 1564, 1566, 1596, 1603, 1620, 1655, 1666, 1675, 1697, 1698, 1702, 1704, 1740, 1741, 1743, 1762, 1764, 1772, 1799, 1808, 1809, 1826, 1827, 1828, 1832, 1840, 1849, 1851, 1871, 1896, 1959, 1961, 1971, 1973, 2063, 2072, 2085, 2087, 2111, 2114, 2120, 2121, 2127, 2129, 2133

Section 2.1 Introduction, Policy Context

Summary

A number of submissions gave a broad welcome to this chapter including Irish Water, Grangegorman Development Agency, Dublin Town and the Land Development Agency (LDA) which cites that the Core Strategy provides a strong basis to support the future development and regeneration of a compact liveable city. Positive commentary was given on the identification of a degree of flexibility regarding future regeneration areas and existing SDRAs. Other submissions acknowledged the work that has gone into the preparation of this chapter.

Some submissions raised general comments including that the content of Chapter 2 needs to be simplified; and that implementation needs to be more realistic. One sought a new growth corridor with increased heights and density on the Stillorgan/N11 route; others made the point on the need for planned infrastructure-led residential development; and another that the Council should develop a strategy to develop large sites belonging to public transport operators for social and/or affordable housing and relocate operators to more peripheral locations.

One submission requested that the local authority consults directly with the Regional Waste Management Planning Office regarding development of the final plans.

There are a small number of submissions seeking that Chapter 2 would incorporate National Planning Objectives (NPOs) Nos. 32 and 33.

There are a number of submissions including from Dublin Town raising concerns with regard to the roll out of strategic transport projects with respect to delivery times and consequent impacts on the delivery of housing across the city and its linked effects on climate action and climate targets for Dublin City. Submissions also included support for the Dart Underground Project, Metro, calls for the Luas line to be extended to Dublin Port and that there should be more Luas lines across the city.

Chief Executive's Response

The comments supporting the clarity of the core strategy to inform future public investment are noted.

The content of Chapter 2 is largely driven by specific requirements under the Planning and Development Act 2000 (as amended). The Council has a mandatory set of data and information that it is required to include (See Section 10 (2A, 2B, 2C) of the Act).

While the Stillorgan Road is not specifically identified as an area of study, the development management process takes on the role of ensuring any development proposals for this corridor comply with the relevant development standards set out in chapter 15 and in accordance with any relevant section 28 Guidelines. In relation to sites associated with public transport operators, a number of SDRAs designations incorporate such sites and set out development principles in relation to these. It should be noted the Draft Plan on page 164 and in objective QHNSO1 supports the role of the LDA in bringing forward public (and other) lands for social and affordable housing. All SDRAs incorporate infrastructural audits to determine capacity; see the response to the OPR submission for further detail on this issue.

The NPOs highlighted in this chapter (NPO 3b, 11, 72a, 72b and 73a) are identified as a selection from the many NPOs that apply not alone to this chapter but the Development Plan in general.

NPO 32 gives a target delivery figure of 550,000 additional households to 2040.

NPO 33 states 'Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location'.

The Core Strategy contained within Chapter 2 is clear that the population targets outlined in Section 2.2.2 and Table 2-5 are from the NPF. NPO 33 is applicable to both Chapter 2 and Chapter 5 and it is considered that both chapters adequately recognise and address the need to provide for new homes, sustainably located, at an appropriate scale through the draft policies and objectives of the Plan and specifically within Table 2-8 Capacity of SDRAs Designated Lands for Residential Use or a Mixture of Residential and Other Uses, (as recommended for amendment, see OPR Response and Recommendations).

The delivery and roll out for strategic public transportation infrastructure development and its operation is a matter for the public transport providers/operators and the relevant agencies including the NTA and TII and, therefore, considered outside the remit of the Development Plan.

Chief Executive's Recommendation

No change recommended to the Draft Plan.

Section 2.2 Quantitative Data Underpinning the Core Strategy

Summary

There were a small number of submissions requesting that population data is updated to reflect a 2021 estimated population base.

Chief Executive's Response

The Draft Plan was prepared using the most up to date available at the time. As a matter of course, data relating to population, CSO completions and the Dublin Housing Taskforce Returns will be updated in so far as practicable.

Chief Executive's Recommendation

It is recommended that Table 2-1 Population Change is updated to reflect CSO estimated population figures for April 2021 (published August 2021) together with associated text changes to reflect same.

Chapter: Executive Summary

Section - Chapter 2 Core Strategy, Population Targets

Page: 5

Amendment:

The Plan considers population targets. It uses the national guidelines on how to calculate likely population increase. By 2028, the city must accommodate between ~~(21,350 – 31,450)~~ {20,120 – 31,520} additional people, up to an overall population target of between 625,750 and 640,000 people by 2028.

Chapter 2

Section 2.2 – Quantity Data Underpinning the Core Strategy

Page: 55

Amendment:

The CSO Census of 2016 (including the most recent CSO annual regional area population projections published August ~~(2020)~~ {2021}) and the quarterly CSO Local Authority Area New Dwelling Completions also inform the Core Strategy.

Chapter 2

Section 2.2.1 – Population and Housing Delivery, Population Growth Patterns

Page: 55

Amendment:

Table 2-1: Population Change

| Census year | Population | % increase |
|---|---------------------------------------|--|
| 2006 | 506,211 | |
| 2011 | 527,612 | +4.2% over 5 years |
| 2016 | 554,554 | +5% over 5 years |
| 2020 ¹ CSO population estimate | (595,434) <u>{600,600}</u> | (7.4) <u>{8.3}</u> % over (4) <u>{5}</u> years |

Source: CSO

The CSO's ~~(2020)~~ {2021} population estimate for the Dublin Region was ~~(1,417,700)~~ {1,430,000} persons. Dublin City Council's share of the 2016 Census regional population figure for Dublin was approximately 42%. Assuming the same share for the CSO ~~(2020)~~ {2021} estimated regional population figure for Dublin, this gives an estimated population figure of ~~(595,434)~~ {600,600} for Dublin City Council in April 202~~(0)~~ {1}. This indicates an estimated ~~(7.4 %)~~ {8.3%} rise in the population of Dublin City over a ~~(four)~~ {five} year period from 2016 through to ~~(2020)~~ {2021}.

Chapter 2

Section 2.2.2 – Population Projections for the Core Strategy set out in the RSES and NPF, Summary

Page: 62

Amendment:

Based on the population targets and calculated housing need set out within national and regional planning policy, guidelines and prescribed methodology, the development plan must accommodate between ~~(21,350 – 31,450)~~ {20,120 – 31,520} additional persons up to an overall population target of between 625,750 and 640,000 by 2028.

2.2.2 Population and Housing Targets

Population Projections for the Core Strategy set out in the RSES and NPF

Summary

One submission seeks that the population projections should go to at least 2050, not 2040. A submission queries the population target based on current population growth that may result with an additional 80,000 persons thus requiring additional capacity to house this population, requiring more land to be zoned.

One submission queries Table 2.7 regarding the figure used for "homeless households and unmet demand", as an underestimation. Another submission raises a disparity between housing targets and the HNDA; with another submission stating that the Core Strategy does not consider the current deficit in housing.

Chief Executive's Response

The 2040 target is set by Government under the National Planning Framework (NPF) and implemented at regional level through the RSES, as set out in Table 2-5 page 60 of Chapter 2. Similarly, the population targets, at a local level, both the high and low scenarios for 2026 and 2031 have also been set by these overarching national and regional documents, see Table 2-6, page 60 of Chapter 2, which has been used to extrapolate the figures during the period of the Plan 2022 – 2028.

Table 2-11 Core Strategy Compliance Table, page 67, identifies residential capacity to accommodate 48,500 units. With an average of 2 to 2.2 persons per household (depending on housing stock) this could equate to up to 100,000 persons, thus demonstrating that capacity exists to facilitate growth patterns evident in Table 2-1 Population Change were they to be realised. The Draft Plan states on page 64 that it is the intent of the Council to keep delivery of the Core Strategy under review; particularly the key lands in the SDRAs, and if a need emerges, to propose changes as necessary.

The homeless household figures are up to date at the time of publishing the Draft Plan, and were provided by the Housing Department and Dublin Regional Homeless Executive, and have been applied in accordance with the methodology set down by Government through the Section 28 guidelines. Figures in the HNDA are calibrated based on the HNDA toolkit and guidance issued by the Department^[1]. The methodology used for the HNDA takes a more long-term approach to unmet demand and this impacts the results. The Development Plan Core Strategy includes all unmet demand into the lifetime of the Plan; unlike the HNDA process which models

this being delivered over a longer time frame; resulting in a lower housing demand figure in the model. See page 84 of Appendix 1, Section 2.1.2.1 for a more detailed analysis of the two approaches.

Chief Executive's Recommendation

No changes recommended.

Section 2.3 Core Strategy

2.3.1 Land Capacity Assessment

Summary

There were a small number of general observations within submissions that linked Development Management standards and the quantum of land zoned, citing together they will place greater restrictions on the deliverability of the Core Strategy with respect to the supply of housing.

The Irish Water submission provided a Core Strategy Infrastructural Assessment for each of the named SDRAs identified in Table 2-8 (captured in detail under Chapter 9 Sustainable Environmental Infrastructure and Flood Risk with respect to existing and programmed infrastructure projects in progress) which makes clear that these strategic land-banks can be serviced to support the intended development. The Irish Water assessment includes for the wider city edge area outside of the SDRA 5 Naas Road, identified as the second priority LAP, Naas Road Lands, Table 2-13 page 75 of Chapter 2.

The Grangegorman Development Agency in their submission noted the extension of the Grangegorman SDRA to encompass redevelopment of the neighbouring lands in Broadstone and look forward to working with the LDA, DCC and all stakeholders to achieve the goals for this part of the city.

There were a large number of submissions on sections from 2.3.1 Land Capacity Assessment to section 2.3.2 Summary - Total Land Capacity and Zoning Requirements with interlinked issues arising from data within Tables 2-8 Capacity of SDRA Designated Lands for Residential Use or a Mixture of Residential and Other Uses through to Table 2.11 Core Strategy Compliance Table. All of these submissions are taken together and summarised below.

- **Density:** A series of submissions raise density, (ranging from too high to too low) tying observations to Table 1: Density Ranges, of Section 3.2 Density (page 219) of Appendix 3, Volume 2, with specific density related observations made on individual named SDRAs areas (Clongriffin, Ballymun, Cherry Orchard, St. Teresa's Gardens, Grangegorman and Emmet Road) together with more general observations citing the need for more ambitious targets for the SDRA areas with respect to estimated capacity relating to Tables 2-8 and 2-10.
- **Deliverability:** Other submissions cite selected text from this chapter that is claimed demonstrate DCC acknowledging that stated estimates will not be delivered during the Plan period. Other observations use data relating to construction activity to demonstrate limited deliverability, with one submission requesting that DCC allow neighbouring authorities to provide the housing supply. Another states the importance of DCC lands being brought forward as it has no control over private lands being delivered; with one

observation seeking that the tables reflect beyond the plan period; with another seeking clarity what is expected to be delivered over the Plan period.

- **Exceedance Figure:** Submissions citing that the Core Strategy calculations on residential capacity in SDRAs is likely to result with housing shortfall requiring additional land to be zoned, based on overestimation of delivery, linked to density and complexity of delivery (including issues of funding) i.e. the need for a greater exceedance level, at least to 25%; with other submissions highlighting that the Core Strategy has excess capacity of land zoned for residential use and, therefore, there is no need increase provision.

Two submissions queried figures for Emmet Road and Ballymun SDRAs in relation to the lands outside of the regeneration site; and in relation to a different figure appearing in Chapter 13, respectively. On submission queried the figures for St. Teresa's Gardens, pointing out the low-density figure used.

Chief Executive's Response

The CE acknowledges these submissions and the complexity of issues relating to the preparation of a Core Strategy. The Core Strategy is a statutory requirement of the Development Plan and has been designed to comply with the NPF, the RSES and the housing targets (through the Section 28 Guidelines on Housing Supply). Both the NPF and the RSES clearly make the case for a sustainable approach to housing that emphasises regeneration as a significant driver of future housing delivery; and the Draft Plan aims to implement these national and regional policies. The Draft Plan is clear that brownfield and regeneration lands are complex, and some sites may take longer than anticipated. For this reason, the Draft Plan has identified further lands which can be used for housing (and mixed use) which it will progress to bring forward during the lifetime of the Plan; and where appropriate adjust the Core Strategy in the light of any updated information on implementation.

The Chief Executive notes the clarity the Irish Water submission brings to the SDRAs Table infrastructural assessment in relation to the availability of services on the SDRAs lands. The Chief Executive notes the support by the Grangegorman Development Agency.

Density

Table 2-8 (Capacity of SDRAs Designated lands for Residential Use or a Mixture of Residential and Other Uses) provides an estimated residential unit capacity on an area of land associated with each named SDRAs designated land. The estimated figure was drawn from two sources, the extant planning permissions on these lands together with a density applied to the remaining undeveloped lands. The figure for the area given in Table 2-8 covers both land with extant permissions and undeveloped zoned lands. The density applied was 100 units per hectare (uph) for undeveloped residentially zoned lands. Where the land is zoned for mixed uses, the density applied was 100 units per hectare for 50% of the mixed-use zoning (to allow for non-residential uses). As stated in the text under section heading Capacity of SDRAs Lands, sustainable densities took into account SDZs and LAPs, where relevant. This figure of 100 units per hectare is at the lower range of densities set out in Table 1: Density Range, page 219 of Appendix 3, Volume 2 of the Draft Development Plan. The lower range was chosen purposefully as the density applied was to a wide area of land (gross density), not a site-specific location (net density). These figures are for estimation purposes and are not min/max targets; future planning applications will be assessed and evaluated on merit in line with the policies and objectives of the Plan and national policy.

The data contained in Table 2-8 is considered a reasonable and considered conservative estimation of the capacity of the SDRAs and allows for other land use requirement such as roads, public realm, open space, community uses, etc.

In relation to the point raised on the location of estimated SDRAs numbers for Emmet Road, apart from the 550 units allocated for the Emmet Road Redevelopment; there are other locations that are included in the SDRAs are identified in Chapter 13, SDRAs, page 541, Figure 19 – 9 Emmet Road; which identifies the opportunity sites apart from the former St. Michael's Estate.

In relation to the estimated unit numbers (2,200 – 2,350) for SDRAs 2 Ballymun as per Table 2-8 when compared to the number of c.1,700 given in Chapter 13, page 477; this is an error. The figure in Chapter 13 should read 2,200 – 2,350. The text in Chapter 13 will be corrected. In relation to the query on St. Teresa's Gardens, the density applied to the remaining lands (11.2 ha) in the Draft was 50 uph; which is a standard figure applied to lands without permission in SDRAs to reflect the mixed-use character of many SDRAs where often half (or more) of the lands are used for commercial and other purposes. Exceptions to this in the table apply where an LAP or SDZ is in place which sets housing/density targets; and also where the SDRAs is primarily a residential development area. It is recognised that SDRAs 11 is also a primarily a residential SDRAs in character and, therefore, it is recommended that the standard 100 uph is applied to the remaining lands (as is applied to Z1 lands as a standard). It is also recognised that there is an error in the extent of the SDRAs and this is also now accounted for.

Deliverability & Exceedance

The CE acknowledges the lengthy submissions made on these interlinked issues from both those involved in the construction sector and those who will be impacted by the implementation of the core strategy.

The CE recognises the challenges presented by the data highlighted in Table 2-4 that gives the ratio of under construction activity to extant permissions and the issues associated with same. However, Figure 2-3 also highlights the positive upward trend of site activity, notwithstanding the reduced pace of this upward trend over the two-year Covid period. Recent years have seen significant levels of re-application of permissions on lands (due to inter alia, ownership changes; changes in national policy and market conditions) which has slowed the implementation of granted permissions. It is anticipated that the forthcoming Residential Zoned Land Tax and other active land management initiatives will accelerate a reduction of the ratio of undelivered sites. It is the intent, as previously stated, to monitor, and if necessary, recommend changes to the Core Strategy where challenges regarding implementation emerge; including changing/downscaling and creating new SDRAs to realign short term growth areas.

17 Strategic Development Regeneration Areas are prioritised for development over the Plan period. An estimated capacity of approximately 35,000 units can be provided on these lands, as per Table 2-10, page 66. When taken together with the lands outside the SDRAs, the total is an estimated 48,500 units. With just over 40,000 units required to comply with the Core Strategy, as per Table 2-11, the SDRAs lands and lands outside the SDRAs can provide an additional estimated 8,350 residential units, (20% exceedance, see Table 2-11) which gives capacity for some units to be provided beyond the Plan period. When this exceedance figure of 8,350 units is taken together with the potential lands at Glasnevin and Naas Road Phase 1 that is estimated to provide 6,000+ units (see Table 2-10), there is a conservative estimate of 14,000 residential units provided for, over and above the required number of approximately 40,000 units; which is available to ensure the Core Strategy is met over the life of the Plan.

Section 2.7.6 in Chapter 2 clearly states that an annual core strategy monitoring report will be prepared together with a two-year progress report published with recommendations to vary and amend the Core Strategy, as appropriate, to ensure continual compliance with Dublin City Council's statutory obligations under the acts.

It is, therefore, considered that the 17 SDRAs (Table 2-8) and the areas outside the SDRAs (Table 2-10) together with potential lands (also Table 2-10) provide adequate choice and availability of land with appropriate levels of estimated capacity to secure the implementation of the Core Strategy over the Plan period and, therefore, there is no need to increase the percentage of exceedance or propose zoning of any substantial other lands at this time, within or as an allocation to other Council areas.

Chief Executive's Recommendation

Chapter 13

Section 13.4 – SDR 2 - Ballymun

Introduction, 3rd Paragraph, 2nd sentence

Page: 477

Amendment:

The remaining sites have the capacity to deliver ~~(c.1,700)~~ **{between 2,200 – 2,350}** new housing units, new commercial and employment opportunities having regard to compact growth principles, development of infill sites and intensification of development along the proposed new Metrolink route.

Chapter 2

Section 2.3 Core Strategy

Page: 64

Amendment:

Replace within Table 2-8 and adjust table and relevant figures accordingly.

SDR 11; St. Teresa's Gardens; (estimated capacity) ~~(950)~~ **{1,500}**; (area Hectares) 13.4.

2.3.3 Housing Strategy and HNDA

Summary

There were a small number of submissions relating to the Housing Strategy and HNDA, (Appendix 1), which is referenced in this Section. The observations included a number of queries on the calculations for the estimate of need given the apparent exclusion of 'unsuitably housed' and HAP tenancies, unit mix and space.

Chief Executive's Response

The HNDA tool has been applied for the first time in this Development Plan as part of the Housing Strategy. Dublin City Council have complied with national guidelines in the preparation of both the Housing Strategy and the HNDA. The detail of the issues raised is responded to in the Appendices section of the CE report.

Chief Executive's Recommendation

No changes recommended.

2.3.5 Future Development Areas

Summary

There were a small number of submissions including from the LDA which welcome this section and seek amendment to name the LDA as part of the consultative process and that the quoted text with the additional wording 'It is the intent of the Council that, following feasibility studies and/or the preparation of a Local Area Plan (or, if designated, a Strategic Development Zone) that these industrial lands will be brought forward as regeneration lands during the lifetime of the Development Plan'.

One submission sought that the Development Plan address the under-utilisation of certain Dublin port lands, including inappropriate uses such as the large car storage facility at East Wall Road and that the Plan should identify such Port areas as potential sites for future residential zoning.

Chief Executive's Response

The Draft Plan contains objective QHNS01 and a paragraph on page 81 supporting working with the LDA across the city area; it is considered that this incorporates the point raised sufficiently. Lands associated with the port area of Dublin that comprise Dublin Port Authority lands, Dublin Docklands and the Poolbeg West SDZ lands and the Docklands SDRA have all been examined as part of the zoning review carried out for the preparation of this Development Plan, (referenced on page 65 of Chapter 2) together with data drawn from the previous zoning review of Z6 and Z7 lands (carried out during the last Development Plan in response to a stated objective). The Draft Plan seeks to balance the competing needs of a complex city environment to ensure a sustainable approach is taken; both in relation to sustainable locations for housing; and in relation to necessary infrastructure to ensure the successful functioning of the city.

Chief Executive's Recommendation

No changes recommended.

2.4 Settlement Strategy

Summary

Some submissions raised the need to ensure housing provision is in close proximity to people's places of work. One submission objected to high density along public transport routes with another submission supporting higher buildings close to public transport and in office districts but objecting to excessive height in the city centre. There are also submissions supporting the 15-minute city as part of the settlement strategy as a key component to the model of polycentric living where urban functions (residential, retail, entertainment) situated within walking of each other with one submission stating that the Core Strategy does not address matters such as limiting the size of the city or where density should be permitted.

Chief Executive's Response

The CE acknowledges the recognition of the sustainable 15-minute city approach. The settlement strategy is based on a mixed-use approach to the large scale SDRAs development areas in the city, as stated on page 70, to ensure that the place of work and home can be in close proximity and where the importance of a public transport corridor associated with these SDRAs provide options for movement between places of work and other activities.

High density development along public transport corridors are critical in meeting the compact growth and sustainable development potential of the city; reducing urban sprawl and serving in the ambitions of climate action by placing housing and employment locations within easy access of sustainable modes of transport.

Height and density issues are addressed specifically under Chapter 4, Shape and Structure of the City and Appendix 3.

Chief Executive's Recommendation

No changes recommended.

2.5 Economic and Employment Strategy

Summary

A small number of submissions were received including opposition to the co working model/hubs in KUVs on the basis they undermine the strength of the office environment for training staff etc. and voice opposition to the 15 minute- city concept as the city is too dispersed with insufficient population to support diversity of services.

Chief Executive's Response

The CE acknowledges the comments and concerns. However, it is not considered that the 15-minute city concept and central offices are an either/or situation. A modern capital city provides a range of employment types and locations in recognition of the great variety of employment within the city. As the population of the city grows over the lifetime of the Plan, with increased brownfield regeneration; infill and delivery of the SDRAs; the overall density of people employed in the city will increase; supporting all types of employment locations successfully; and giving people greater flexibility. Further detail in relation to the 15-minute city concept is outlined in the response to issues raised under Chapter 4.

Chief Executive's Recommendation

No changes recommended.

2.6 Retail Strategy

Summary

There were a number of submissions seeking a retail study for Rathmines; seeking detailed objectives for Ranelagh, Stoneybatter and Artane, and seeking that the definition of Key Urban Villages should be amended such that they are based on but not identical to the Level 3 retail centres of the RSES.

Chief Executive's Response

A detailed response in relation to the issues raised on the Retail Strategy is addressed in Chapter 7 City Centre, Urban Villages and Retail of this report.

Chief Executive's Recommendation

No changes recommended.

2.7 Implementation

2.7.1 Plan Making

Strategic Development Zones (SDZs), Priority Local Area Plans

Summary

A small number of submissions made expressed support for the SDZ at Poolbeg West and Grangegorman SDZ. One submission opposed the inclusion of the industrial port related facilities in the Poolbeg West Scheme which with the view expressed that such policies will turn the peninsula into an industrial corridor. One submission requests a review of all three SDZs in light of forthcoming legislation with respect to Urban Development Zones.

There were a number of submissions in relation to the priority LAPs listed in Table 2-13 and associated objectives CSO1, CSO2 and CSO3. One submission cites a need for flexibility in relation to all three Priority LAPs with respect to the forthcoming legislation on Land Value Sharing and Urban Regeneration Zones.

A number of submissions welcomed the inclusion of CSO1 for the North East Inner City, and the focus on the social regeneration and also sought inclusion of certain districts within the LAP.

The LDA made a submission supporting Objective CSO2 relating to lands at Kylemore Road/ Naas Road and Ballymount and requests a specific mention of the agency within the objective. CIE and Irish Rail submissions acknowledge the inclusion of lands covered by the City Edge Project that relates to Objective CSO2 and state their engagement with DCC, SDCC and the LDA (with specific reference to the Government's Housing for All Strategy) but request that DCC acknowledge any designation or consideration under the Development Plan would not preclude any development in furtherance of public transport uses or operations.

One submission discusses lands adjacent to Broombridge Interchange calling for its promotion as an area with capacity for a high-density mixed-use development.

Chief Executive's Response

The CE acknowledges the comments made expressing support for the ongoing implementation of both the Grangegorman and Poolbeg West SDZs. Issues regarding the port lands in the docklands have been appraised in detail in Chapter 4 -Shape and Structure of the City. Decisions in relation to changes and/or future of SDZs is not a matter for the Development Plan as they operate under separate provisions of the Planning Acts.

It is recognised that there is forthcoming legislation on Urban Development Zones and that it would be preferable that the headings of this section are amended to include all statutory local

plans- LAPs, SDZs and UDZs. This will reflect that any one of the three forms of plans may be the most suitable for the particular circumstances of a location.

In relation to boundaries, it is a part of the Local Area Plan making process that the initial research for preparing the plan identify the most suitable boundary. Therefore, it is considered decisions on possible boundaries are best addressed at preparation stage.

The Draft Plan contains Objective QHNS01 and a paragraph on page 81 supporting working with the LDA across the city area; it is considered that this incorporates the point raised sufficiently. In relation to operation of transport functions, the City Edge area remains zoned Z6 in the Draft Plan which supports the continuing transport uses in place. Any new local plan or variation will provide the forum for the impact of changes to be considered.

In relation to Broombridge, the Draft Plan gives recognition of the potential capacity for a more compact, consolidated and intensified redevelopment at this location with the inclusion of lands at Glasnevin Industrial estate, and environs in the Priority LAP which includes lands at Broombridge; and as such, no further additional text is needed.

Chief Executive's Recommendation

Chapter 2

Section 2.7.1

Page: 75

Amendment:

Amend heading text for sub-section and for Table 2-13.

~~{Priority LAPs}~~

{Priority Statutory Local Plans^[2]}

Table 2-13: Schedule of ~~{Local Area Plans}~~ {Statutory Local Plans} to be Commenced over the Plan Period.

Local Area Plans/ Village Improvement Plans (VIPs)

Summary

There were a large number of supporting submissions relating to areas listed within Table 2-14. Some observations within these submissions raised concerns regarding timeframes, content and boundaries and where such boundaries could overlap with SDRA defined areas.

The LDA requested that the intention to prepare an LAP would not preclude development being proposed once the objectives of the development plan are delivered suggesting this provision forms part of Objective CSO4.

A significant number of observations were made in relation to Santry/ Whitehall (incl. Omni KUV) seeking a plan-led approach to the development of Santry to respond to the current pressures experienced in relation to recent developments being carried out in the absence of a framework for the local environs. The need for engagement and consultation with the existing community as part of that process was raised.

A large number of submissions raised Phibsborough KUV requesting the area to be made the fourth priority LAP under Table 2-13, making the case that past events regarding the status of a previous draft LAP that was not adopted could be used as a base document. Other observations requesting that current objectives in the 2016 – 2022 Development Plan relating to the Phibsborough area are brought forward in this Development Plan and raised concerns on the spatial area associated with the boundary to the KUV of Phibsborough considering it too small an area for an LAP.

A number of submissions on Drumcondra, while welcoming the inclusion of an LAP for this area and identifying the need for environmental works to be carried out on the Upper Drumcondra Road, seek protection of the arts hub at Drumcondra station and the need for enforcement on unauthorised uses in the area.

Submissions relating to Stoneybatter, a listed LAP/VIP under Table 2-14 requests that in the absence of an LAP for Stoneybatter, the area should be designated a KUV, with another submission requesting that Stoneybatter is earmarked as an SDR. One observation requests that Stoneybatter should be designated an Area of Special Planning Control.

A number of submissions relating to Drimnagh seek the development of local plan for the area to address a number of issues with one observation seeking that Drimnagh should be part of the SDR for the Naas Road area.

One submission seeks that both Ranelagh and Donnybrook are taken together as one LAP/VIP and given an ACA status.

In relation to Harold's Cross, the case is made for the need for an audit of underutilised sites and a local HNDA for the Harold's Cross area to be included in any future LAP.

Other submissions seek the inclusion of additional named areas to Table 2-14 including Milltown, the South Georgian Core, Chapelizod, and the crossroads village area of Sundrive Road / Kimmage Road Lower / Larkfield Park.

One submission sought that personal safety audits be undertaken in all Local Plans and that a gender impact assessment be included as part of the Development Plan.

One submission noted that DCC is the least affluent of the four local authorities in Dublin; with an overall Pobal HP Absolute index score of -1.5 (in 2016), it is characterised as 'marginally disadvantaged'. There are many areas of DCC that are characterised as disadvantaged, very disadvantaged and extremely disadvantaged – and, therefore, in need of regeneration.

Chief Executive's Response

The delivery of the Local Area Plans and Village Improvement Plans listed in Table 2-14 will require a phased approach; which will be based on a prioritised selection; to be agreed by the Elected Members, following the adoption of the Development Plan. Three key prioritisation criteria that will be used to guide the phases of delivery of the LAPs, are set out on page 76 of the Draft Plan.

In relation to other locations proposed to be added to Table 2-14, it is considered that the schedule of Plans currently listed is extensive and challenging, and it is unlikely all will be delivered during the lifetime of this Development Plan. Priority will be given to locations that

support the delivery of significant new housing and regeneration. Of the places suggested for addition, none meet the criteria on Page 75/76 sufficiently to warrant their inclusion at this time.

All plans prepared will take into account Development Plan policies and objectives, national and regional policy (NPF and RSES), Government Guidelines and the particular local issues that are relevant to the area in question, including decisions on boundaries (and combining plan areas if appropriate). Public consultation is an inherent part of the process of preparing a LAP and VIP process. Decisions as to the most appropriate type of plan will be considered following adoption of the Draft Development Plan; taking into account the prioritisation issues outlined on page 76 of the Draft Plan.

In relation to the issue raised by LDA on LAPs, lands within the City are zoned for a range of broad purposes, including housing, mixed use, retail, regeneration etc. Where lands are zoned for the relevant development purposes, planning applications on such lands will be considered on their merits; based on their compliance with the policies and objectives of the City Development Plan, and where relevant, the guiding principles outlined in the relevant SDRA.

In relation to Areas of Special Planning Control, Chapter 4 of the Draft Plan supports the preparation of new and updating of existing areas of special planning control (ASPCs) where necessary and appropriate. Any proposal will be considered on their merits outside of the Development Plan process. Related issues in relation to ACA's are addressed under Chapter 11 Built Heritage and Archaeology. ASPCs can only be made within areas already designated Architectural Conservation Areas (ACAs).

SDRAs are generally designated due to the areas ability to accommodate large scale new development and to provide significant intensive regeneration, proximate to high quality public transport/places of high employment. It is not considered appropriate at this time to include Drimnagh as part of any SDRA lands as it is not characterised by a clustering of large-scale redevelopment lands that can deliver significant housing and/or employment as part of an intensive regeneration.

In relation to issues raised about Chapelizod and Crumlin – Kimmage; both are identified under Table 2-15 for future LEIPs. It is considered that this level of local planning is appropriate for these areas at this time.

The South Georgian Core is also responded to in Chapter 4, Shape and Structure of the City. All Georgian areas of the city, including the South Georgian Core are zoned Z8 under the zoning objectives of the plan. The Z8 zoning has a focus on the need to facilitate regeneration, cultural uses and appropriate residential development whilst managing the concentration of office uses in these areas.

The South Georgian Townhouse Re-Use Guidance Document commissioned by Dublin City Council (March 2019) sets out a range of possible solutions for the adaptation, densification and conversion of some typical Georgian town houses. The document is specifically referenced in the Draft Plan. Regarding the south Georgian core, of particular relevance are policies BHA24 – reuse and refurbishment of historic buildings, BHA25 - loss of upper floor access, BHA14 - mews, QHSN6 – upper floors, QHSN7 – reduction of vacancy and CCUV18 – residential development. Both core Georgian areas of the city are also identified as important cultural quarters with relevant policies set out under CU7, 8 and 9. Section 15.15.2.2 specifically addresses development in conservation areas, as does policy BHA9. In this regard, it is considered that the inclusion of the South Georgian Core as a named area for either an LEIP or LAP/ VIP is not necessary at this time.

The CE notes the reference to the stated findings of Pobal Index of Deprivation. This is one of three key assessment criteria in the selection process for the prioritisation of LAPs/VIPS schedule listed in Table 2-14.

A number of the submissions raised local operational issues regarding road improvements, enforcement, planting etc., which are not appropriate for the Development Plan.

Chief Executive's Recommendation

No change is recommended.

Local Environmental Improvement Plans/ Local Strategies

Summary

There were a number of submissions on the Dorset Street Together Plan, referenced in the text on page 77 of this chapter, welcoming its inclusion but seeking that this is updated to the Greater Dorset Street Plan on the basis that original plan has evolved to include Blessington Street, Berkeley Street and Berkeley Road citing that The Greater Dorset Street Together Plan, has been presented to and approved by the Council on several occasions.

There were a number of submissions on existing LEIPs including Ringsend / Irishtown LEIP, Phibsborough and Sandymount LEIP to adapt and amend the relevant LEIP; and to include areas on the list for a LEIP as the current LEIP is still live. There were also a number of submissions seeking the inclusion of the South Georgian Core to the list of LEIPs in Table 2-15.

There were submissions requesting a masterplan be prepared for Gulistan bring centre / Former Church of Ireland training college lands and the Cathal Brugha Barracks all located in Rathmines, with a further request for the Dublin City Public Realm Strategy (2012) be updated to include Key District Centres that would include Rathmines.

Chief Executive's Response

While it is accepted that the Dorset Street area has had a number of local initiatives, the reference to the Dorset Street plan in the text is by way of one example (to other local communities) that can potentially inform a future listed LEIP which in this case has been called Dorset Street in Table 2-15. Boundaries of any LEIP will be agreed as part of the preparation process of a LEIP.

The preparation of a LEIP is in collaboration and consultation with the relevant local area committee, as stated in the text to this section. Any changes required to existing LEIPs can be addressed at a local level and plan amended where necessary. Table 2-15 is a list of areas proposed for a LEIP and, therefore, it does not include areas that have already benefitted from the preparation of and LEIP and are now at implementation stage.

The use of local masterplan and/or strategy as a tool to provide a framework for future development within a specified area can be considered at a local level where the appropriate circumstances are in place. In relation to Guliston, which is in Council ownership; a masterplan has been prepared and presented to the South East Area Committee. Where future masterplans are considered essential (for example as part of a larger site redevelopment), such proposals will be progressed on their merits.

The points raised in relation to the South Georgian Core has been responded to in the section above.

Chief Executive's Recommendation

Chapter 2

Section 2.7.1

Page: 77

Amendment:

Amend text to replace ~~(Dorset Street Together Plan)~~ with {Greater Dorset Street Plan}

2.7.2 Active Land Management

Summary

A number of submissions supported the strategic objectives promoting compact growth and densification of the city in efforts to ensure the city remains sustainable with calls also to ensure that the consolidation of the city remains prioritised. There are a number of submissions, including Dublin Town and residential groups, which support measures in the Draft Plan to manage vacant sites through the Vacant Site Legislation and the Living City Initiative.

A number of submissions support the use of the Derelict Sites Act and Compulsory Purchase to achieve compact growth tackling dereliction, increase occupancy and reducing or eliminating vacancy, seeking that Dublin City Council must take a more pro-active approach. Another submission requests that brownfield sites that have been idle for more than two years should be subject to a compulsory purchase order. A number of submissions identify various sites where action is called for (through compulsory purchase orders or vacant site levy) including O'Connell Street, North Strand Road, Connaught Street and Ballybough Road. One submission sought a new objective to carry out an analysis on the use of the Derelict Sites Act to ensure that all derelict sites are captured.

Some submissions linked elements of both section 2.3 (Climate Change) and section 2.4 (Settlement Strategy) of this chapter with this section citing the sustainability value of returning vacant existing premises and unoccupied upper floors of commercial buildings to full occupancy by encouraging the re-use / re-purposing of (older) buildings to assist in climate action measures by reducing carbon footprint, promoting compact growth, increasing density and enhancing the mixed-use communities strategic approach that will enable the 15-minute city concept.

Other submissions sought the extension of the Living City Initiative to incorporate all of Berkeley Road and the North Circular Road between Doyle's Corner and the Berkeley Road-North Circular Road Junction, with submissions also calling for the appointment of a dedicated DCC officer for the Living Over the Shop scheme.

Some submissions sought an update to the three objectives (CSO8, CSO9 and CSO10) with respect to legislation regarding the potential successor to Vacant Sites legislation.

Other submissions identified grants, tax incentives, and tax penalties as varying carrot and stick approaches to activating unused existing space and upper floors for housing purposes. One further submission highlights how many Irish people live in homes that may be too large for their

current needs, identifying the opportunity to explore how large homes could be repurposed with step down accommodation made available locally.

One submission seeks that Objective CSO6, or a new objective, provides a commitment by DCC to maintaining a live 3D model of the built environment to aid in the greater understanding of how new developments will interact with the built environment.

Chief Executive's Response

The submissions supporting active land management are noted. Dublin City Council has in place a number of programmes to respond to brownfield vacancy including the Vacant Site legislation and the Derelict Site Register and will continue to make use of the current and any future legislative tools to promote brownfield redevelopment, reduce vacancy and dereliction within the city, up to and including Compulsory Purchase; all of which are actively progressed on an ongoing basis. Addressing vacancy and dereliction are challenging to the complex range of issues that can result in many such cases. It is considered that the Draft Plan fully supports this approach through objectives CSO6 and CSO7 (page 78) and, therefore, no further changes are required to the text.

Greater utilisation of existing housing stock that meets the needs of older people and releases housing for more intensive use is discussed under section heading Housing for Older People, Chapter 5 Quality Housing and Sustainable Communities, page 176 and also Chapter 15 Development Standards. It is considered that this approach is fully addressed in the Draft Plan.

Page 79, Objective CSO6 provides for an Active Land Management Register and Database which includes vacant sites. This measure together with the existing Vacant Site Register will provide data to Dublin City Council to assess, evaluate and determine actions necessary. The current Derelict Sites Register is publicly accessible at <https://www.dublincity.ie/residential/planning/active-land-management/derelict-sites>. It is recognised that the current vacant site levy will be amended in the future. The wording in Objective CSO9 has anticipated this and is considered adequate.

The Living City Initiative is a government led tax incentive based on certain criteria over a wide spatial and geographic spread across Dublin City; which is defined by Government; changes to the boundary are not a Development Plan matter.

It is considered that Objective CSO6 will provide a comprehensive database to enable decision making in relation to active land management. Decisions on modelling are operational issues and not appropriate for the Development Plan.

Chief Executive's Recommendation

No change is recommended.

2.7.3- 2.7.5 URDF Funding, Development Management, Enhanced Coordination

There were a number of submissions on this section relating to funding, identifying the need for more infrastructure and suggesting that the council should divide the city into localities where available development sites within the locality are examined and the social, educational, transport, sport and green infrastructure requirements for the future population are planned for before large developments take place or institutional lands are sold off. One submission relating

to Kilmainham Inchicore Development Strategy (KIDS) Objective CSO13 seeks that URDF funding be made available for civic and community buildings.

There were a small number of observations relating to the level of court cases involved in planning applications, affecting the timing on delivery, lack of control over development of sites post-zoning, calls for builders to reinstate roads fully after opening them up, requesting that poor construction materials are banned, requests for standards of brickwork and windows to be in accordance with Dublin's heritage and seeking dedicated teams to monitor design and construction.

The submission from the OPW raised Objective CSO14 regarding the Dunsink Observatory, seeking engagement with the relevant authorities and stakeholders in connection with progressing plans for the area.

There were a number of submissions including from groups and resident groups that identified issues regarding the perceived lack of interagency co-operation on the implementation of the Development Plan, raising issues including HSE decisions on women's refuges and child care, over reliance on the market and vulture funds for delivery of the Core Strategy. Also raised was the need for quicker delivery of infrastructure through better cooperation with other government bodies and an ability to quickly increase capacity when delays do occur and asking that dedicated project teams are in place to be held accountable.

Chief Executive's Response

The CE recognises the need for additional funding for the city to assist in implementing the City Development Plan and will continue to make applications, where appropriate and the opportunity arises. The Council has been successful in previous bids under a range of funding streams including LIHAF, Serviced Sites Initiative, the Housing Land Initiative and URDF.

The matters raised in relation to court cases; timelines and building standards relate to operational issues regarding enforcement, building control, taking in charge and judicial review of decisions and are not relevant to the Development Plan.

The OPW are referenced in this section along with other key stakeholders regarding enhanced co-ordination. While not specifically named in Objective CSO14, it is considered the term 'relevant stakeholders' covers the OPW along with all other key stakeholders and, therefore, it is considered that a specific reference to the OPW is not required; taking into account that the Dunsink Observatory falls within Fingal County Council who will be the lead on any Dunsink study.

Chapter 16 Phasing and Implementation set out details in relation to future engagement – see section 16.2 Collaboration and Engagement. The Council supports a number of consultative forums including the Public Participation Network (PPN), the Dublin City Local Community Development Committee and Comhairle na nOg. Dublin City Council is constantly evolving its engagement and collaboration techniques and in this regard.

In relation to monitoring Section 2.7.6 Monitoring and Evaluation specifically states that an agreed scheduled programme of works arising from policies and objectives will be prepared to ensure proactive delivery in a timely manner, the progress of which will be reported upon in the two-year progress report (see Objective CSO15, page 85), a statutory requirement under the planning and development act, 2000 as amended.

In relation to interagency cooperation; Chapter 5 Quality Housing and Sustainable Communities specifically identifies Tusla, the Child and Family Agency with respect to Policy QHSN30 Domestic Violence Refuges; with the HSE specifically named under Section heading 'Healthcare', page 192 of Chapter 5 that also incorporates childcare facilities under Policy QHSN53 with objective QHSNO16 relating to Pre - School Facilities. Under the heading Schools and Education, page 193 of Chapter 5, the ongoing issues of evaluating the needs of school places in emerging areas of population is stated with clear policies on such educational provision identified under Policy QHSN51 and QHSN52, page 195. It is, therefore, considered that these matters are adequately addressed under Chapter 5.

Chief Executive's Recommendation

No change is recommended.

2.7.6 Monitoring and Evaluation

Summary

There were two submissions relating to this section seeking that a progress report should be carried out every two years and not just once after the first two years of adoption of the Plan. A second submission suggests that a section relating to an assessment on the last Development Plan should be included in order to monitor progress.

Chief Executive's Response

The two-year progress report is a statutory requirement of the Development Plan. The new draft Section 28 Guidelines on Development Plans identifies amended monitoring of progress on the Development Plan under new timeframes. Dublin City Council will amend its monitoring practices to accord with new provisions when the Guidelines are issued; in order to continue to comply with its obligations. The preparation of the Draft Plan commenced with a review of the 2016 City Development Plan.

Dublin City Council will continue to work closely with the Department, the OPR and the Regional Assembly to develop and implement a range of monitoring criteria that can be regularly applied over the lifetime of the Plan.

Chief Executive's Recommendation

No change is recommended.

^[1] Guidance on the Preparation of a Housing Need and Demand Assessment, Department of Housing, Local Government and Heritage, 2020.

^[2] [{Local Area Plans, Strategic Development Zones, Urban Development Zones}](#)

Chapter 3: Climate Action

Chapter 3: Climate Action

Submission Number(s):

0003, 0253, 0412, 0594, 0609, 0642, 0690, 0692, 0761, 0804, 0811, 0890, 0939, 0940, 0944, 1011, 1037, 1038, 1056, 1075, 1083, 1088, 1137, 1153, 1156, 1163, 1191, 1201, 1207, 1238, 1264, 1310, 1370, 1386, 1406, 1447, 1448, 1453, 1463, 1470, 1472, 1480, 1482, 1492, 1509, 1523, 1545, 1553, 1557, 1568, 1576, 1579, 1612, 1620, 1625, 1645, 1680, 1682, 1700, 1704, 1708, 1732, 1733, 1749, 1750, 1761, 1769, 1778, 1784, 1797, 1799, 1802, 1811, 1834, 1835, 1837, 1849, 1850, 1851, 1853, 1855, 1858, 1861, 1878, 1882, 1884, 1892, 1960, 1961, 1971, 2086, 2087, 2121, 2126, 2127, 2129, 2139, 2144

Section 3.1 Introduction

Summary

A number of submissions welcome the approach to climate action and its integration throughout the Development Plan. Some submissions raise concerns regarding the national targets set out for reducing carbon, with some seeking the Development Plan to acknowledge that they are unrealistic and others seeking more ambitious targets for Dublin. One submission notes that facts on climate change should be made clear. Another submission seeks reference to the climate ‘crisis’ that was declared in Ireland, noting that a climate and biodiversity emergency was declared, the latter of which is referenced in the Draft Development Plan. A number of submissions seek reference to the published Climate Action Plan 2021 and for the Development Plan to be updated accordingly.

Chief Executive’s Response

The Chief Executive welcomes support for the approach taken to address climate change in the Draft Plan.

In accordance with EU policy, the 2020 programme for government ‘Our Shared Future’ commits to achieving 51% reduction in Ireland’s greenhouse gas emissions from 2021 to 2030, and to achieve net zero no later than 2050. The Climate Action and Low Carbon Development (Amendment) Act 2021 sets out a legally binding framework to deliver these targets. The Climate Action Plan 2021 sets out a roadmap to deliver these targets, which will be updated annually. These targets are not discretionary and, therefore, the Development Plan must be consistent with national policy.

The overall strategic approach to climate action in the Draft Plan is to ‘mainstream’ or integrate climate mitigation and adaptation principles across all chapters of the Plan, in order to ensure Dublin adheres to national targets. A dedicated Climate Action chapter is included in the Draft Plan and Table 3.1 sets out a clear summary of Climate Action measures by Chapter. Furthermore, the Climate Change Action Plan for Dublin City (2019-2024) (CCAP) sets out over 200 actions across five key areas (energy and buildings, transport, flood resilience, nature-based solutions and resource management) in order to make DCC more adaptive and resilient to the current and future impacts of climate change. The CCAP is reviewed quarterly and updated annually. While the challenges are acknowledged, the City Council is taking a proactive leadership position. In this context, the Chief Executive does not consider it appropriate to challenge or amend the targets set out in national policy.

It is considered that the Draft Plan comprehensively addresses the facts regarding climate change. Specific policy requirements are set out in each chapter. The matter of the declaration of a climate and biodiversity emergency is noted. While it is considered that the text adequately conveys the seriousness of climate change, it is noted that Section 10.3 references the 'biodiversity emergency' that was declared by Dáil Éireann in 2019. In the interest of consistency and in order to further emphasise the critical importance of climate action for the city, it is considered appropriate to update text accordingly in Chapter 3.

The Chief Executive notes the submissions that reference the publication of the Climate Action Plan 2021. While it is considered appropriate to update text to reflect the 2021 Climate Action Plan, it is also noted that it is intended to update the Climate Action Plan annually. The Draft Plan acknowledges that as new climate action legislation is published, it may be necessary to adapt policies in the future. Objective CA02 - Variation of Development Plan to Reflect New Guidance/Legislation' supports this approach.

Chief Executive's Recommendation

Executive Summary

Section: Chapter 3: Climate Action

Page: 6, final bullet point of the last paragraph

Amendment:

The plan must pay attention to the action areas identified in ~~(the)~~:

- ~~{The}~~ National Planning Framework (NPF) ~~(and)~~
- ~~{The}~~ Regional Spatial Economic Strategy
- {The National Climate Action Plan}
- {The Climate Change Action Plan for Dublin City (2019-2024)}
- ~~(Dublin City Climate Change Action Plan)~~

Chapter 3

Section: 3.1 Introduction, subsection – International, National and Local Climate Policy

Page: 91

Amendment:

~~(Nationally, the government's 2019 Climate Action Plan (CAP) provides a detailed framework which identified how Ireland will achieve its 2030 targets to reduce greenhouse gas emissions by 30% compared with 2005 limits. This target was increased to 51% under 'Our Shared Future', the 2020 programme for government.)~~ {Nationally, a climate and biodiversity emergency was declared by Dáil Éireann in 2019. Subsequently, the government's 2021 Climate Action Plan (CAP) provides a detailed framework which identified how Ireland will achieve a 51% reduction in Ireland's overall GHG emissions from 2021 to 2030, and to achieving net-zero emissions no later than 2050. These legally-binding objectives are set out in the Climate Action and Low Carbon Development (Amendment) Act 2021.} The CAP commits to delivering a just transition, recognising the significant level of change required and that the burden must be as fairly distributed as possible.

In addition, under the National Adaptation Framework, twelve Sectoral Adaptation Plans were published by various government departments in 2019, setting out key risks faced across the

different sectors and the approach being taken to address these risks and build climate resilience for the future.

~~(More recently, the Climate Action and Low Carbon Development (Amendment) Bill 2021 has been adopted, putting Ireland on a legally binding path to net-Zero emissions no later than 2050, and to a 51% reduction in emissions (relative to a baseline of 2018) by the end of this decade.)~~

Chapter 15

Section: Section 15.7 Climate Action

Page: 675, 1st paragraph

Amendment:

Chapter 3 sets out the policies and objectives for climate action in the city. Dublin City Council will encourage the use of sustainable development principles to combat climate impacts in line with the Dublin City Climate Action Plan ~~(2019–2024)~~ {2021} or as amended.

Section 3.5 Policies and Objectives

Summary

A number of submissions seek reference to the published Climate Action Plan 2021 and for the Development Plan to be updated accordingly. One submission was received seeking the introduction of a policy similar to Policy CC2 in the current Development Plan, to read ‘to mitigate the impacts of climate change through the implementation of policies that reduce energy consumption, reduce vehicle emissions, reduce energy loss/wastage, and support the supply of energy from renewable sources.’

Chief Executive’s Response

The Chief Executive notes the submissions that reference the publication of the Climate Action Plan 2021. As noted above, it is considered appropriate to update text to reflect the 2021 Climate Action Plan.

The Chief Executive notes that Policy CA1 supports the implementation of national objectives on climate change. Policy CA2 strategically addresses climate mitigation and adaptation. Specifically, Policy CA4 addresses climate mitigation and adaptation in strategic growth areas, Policy CA7 comprehensively addresses climate mitigation actions in the built environment and Policy CA8 addresses climate adaptation actions in the built environment. Policies CA10-CA21 address aspects of energy and Policy CA24 and Objective CA04 address EV vehicles and charging. It is, therefore, considered that the policies contained in the Draft Plan comprehensively addresses the matter raised.

Chief Executive’s Recommendation

Chapter 3

Section: 3.5 Policies and Objectives

Page: 97, final paragraph

Amendment:

As climate action policy continues to develop with the publication of the draft Development Plan Guidelines for Planning Authorities and ~~(the anticipated introduction of new climate action legislation)~~ {annual updates to the National Climate Action Plan}, Dublin City Council acknowledges that it may be necessary to adapt policies in future in order to ensure full compliance with any new legislative or policy requirements.

Chapter 3

Section: 3.5 Policies and Objectives

Page: 98, Policy CA1

Amendment:

Policy CA1 National Climate Action Policy

To support the implementation of national objectives on climate change including the ~~(‘Climate Action Plan 2019 to Tackle Climate Breakdown’)~~ {‘Climate Action Plan 2021: Securing Our Future’ (including any subsequent updates to or replacement thereof)}, the ‘National Adaptation Framework’ 2018 and the ‘National Energy and Climate Plan for Ireland 2021-2030’ and other relevant policy and legislation.

Section 3.5.1 Sustainable Settlement Patterns

Summary

A submission was received requesting that Policy CA4 – ‘Climate Mitigation and Adaptation in Strategic Growth Areas’ be modified to include development in all areas and not just in Strategic Growth Areas (including Strategic Development and Regeneration Areas). A further submission recommends that a policy is included which specifically provides for retro-fitting of existing built-up areas with measures which will contribute to their meeting the objective of a low-carbon city.

Chief Executive’s Response

Climate mitigation and adaptation policies apply to all areas (as per CA2), but CA4 places additional emphasis on Strategic Growth Areas. SDRAs are predominantly brownfield lands in both inner and outer city areas, where there is capacity for a greater level of intensification due to their proximity to public transport corridors and proximity to existing urban areas. This approach accords with the objectives of the National Planning Framework (NPF), The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Region, including the Metropolitan Area Strategic Plan (MASP) set out therein, for the creation of a more compact city.

Chapter 4 – Shape and Structure of the City sets out the overarching framework to guide the future development of the city, to ensure that growth is directed in the appropriate locations. Such an approach also supports the objectives set out in the ‘Climate Action Plan 2021: Securing Our Future’. It is the opinion of the Chief Executive that the promotion of such development that incorporates appropriate climate adaption and mitigation measures will bring about meaningful climate action during the life of the Development Plan. For this reason, it is not considered necessary to modify policy CA4.

Chief Executive’s Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Section 3.5.2 The Built Environment

Summary

A number of submissions were received relating to Policy CA5 (Retrofitting and Reuse of Existing Buildings), with a number supporting the repurposing and reuse of older buildings, rather than their demolition. One submission welcomed the policy but requests amendments to Table 15-1 Thresholds for Planning Applications for the policy to be effective. It is also requested that embodied energy and whole life cycle analysis is added as a requirement for any proposed demolitions of existing buildings. Other submissions also related to the concept of embodied carbon and stated that this should inform all building and infrastructure replacement decisions. A submission received states that the Draft Plan should clearly outline what percentage of DCC housing stock will be retrofitted throughout the lifetime of the Plan. Some submissions state that Policy CA5 should target social housing and seeks that DCC accelerate retrofitting of other public properties, including encouraging the retrofit of schools. A submission relating to Policy CA6 welcomed the approach, but suggests that the target be amended to achieve B2 BER or 'Cost Optimal' and suggests that reliance on the BER system will often result in limited solutions.

Chief Executive's Response

The Chief Executive notes submissions that address embodied carbon in relation to proposals for demolition. Section 15.7.1 'Re-use of Existing Buildings' states that 'where demolition is proposed, the applicant must submit a demolition justification report to set out the rational for the demolition having regard to the 'embodied carbon' of existing structures as well as the additional use of resources and energy arising from new construction relative to the reuse of existing structures.' The concept of embodied carbon is also addressed in Section 3.5.2, subsection 'Climate Mitigation Actions and the Built Environment' and addressed by Policy CA7 (Climate Mitigation Actions in the Built Environment). Furthermore, Section 11.5.4 'Retrofitting, Sustainability Measures and Addressing Climate Change' and Section 15.4.3 'Sustainability and Climate Action' also address embodied carbon. Therefore, it is considered that the substantive issue raised is adequately addressed by the current text and policies of the Draft Plan.

In relation to the issue that Policy CA5 should target social housing, this matter is addressed by Policy CA6 (Energy Efficiency in Existing Buildings) which seeks 'to support high levels of energy conservation, energy efficiency and the use of renewable energy sources in existing buildings, including retro-fitting of appropriate energy efficiency measures in the existing building stock, and to actively retrofit Dublin Council housing stock to a B2 Building Energy Rating (BER) in line with the Government's Housing for All Plan retrofit targets for 2030.' In relation to schools, Policies CA5 and CA6 are applicable.

Having regard to the matter requesting that DCC quantify the number of social housing stock retrofits that will be undertaken during the lifetime of the Development Plan, the Chief Executive references Section 3.2 which states that DCC, through its Fabric Upgrade Programme, upgraded over 8,000 units since 2013. The upgrading of DCCs housing stock is addressed by 'The Climate Change Action Plan for Dublin City (2019-2024)', as supported by Policies CA5 and CA6. The quantum of units that may be retrofitted is dependent on a number of factors external to the Development Plan. This is considered an operational matter and not a matter for the Development Plan.

The suggestion that Policy CA6 be modified to include 'cost optimal' instead of a B2 Building Energy Rating (BER) is noted. Policy CA6 actively seeks the retrofit of Dublin Council housing stock to a B2 BER which is consistent with the Government's Housing for All Plan retrofit targets

for 2030. The Draft Plan is consistent with this and, therefore, it not considered necessary to modify this policy.

Chief Executive's Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Section 3.5.3 Energy

Summary

A submission from the Department of Environment, Climate and Communications note that the revised Climate Action Plan 2021 has been published and request that the Draft Plan be updated to reflect same. With respect to Policy CA12 - Offshore Wind Energy Production, it is noted that the Department is in the process of preparing a new Offshore Renewable Energy Development Plan and request that this policy be amended to take account of any review of the 2014 OREDP (e.g. as addressed in Policy SIO30). In relation to district heating, it is noted that the policy provisions take account of the National Planning Framework. It is requested that the Draft Plan be amended to take account of the Climate Action Plan 2021, with reference to district heating related actions therein.

The submission from the Electricity Supply Board (ESB) broadly supports the Plan, including new energy technologies such as PV, offshore wind generation and waste heat infrastructure. The ESB supports the designation of Poolbeg as a strategic energy hub and notes that it has a support role for proving land side infrastructure.

A submission received supports Poolbeg as a Strategic Energy Zone and would encourage DCC to consider this.

A submission from EirGrid is supportive of the Draft Plan regarding energy utilities, but notes the need to provide greater reference to the role of electricity transmission grid infrastructure in meeting the challenges of climate change and energy. It is stated that the Draft Plan needs to provide more guidance on spatially suitable locations for larger energy generation and demand centres (i.e. data centres) to ensure efficient use of the existing transmission network and to ensure that EirGrid can plan for energy zones / energy scenarios / the development of the electricity transmission grid.

A number of submissions seek a moratorium on new data centres.

Some submissions support the prioritisation of district heating, while some are not convinced.

Some submissions seek a rewording of Policy CA16 (District Heating). One submission considers that it may be interpreted that each individual development, as part of their Climate Action Energy Statement, would be required to include an assessment of feasibility of district or block heating or cooling. Another requests that Policy CA16 is reworded to clarify that as the Climate Action Energy Statement is site/development specific, its remit would relate to the feasibility of making the development district heating enabled.

One submission seeks the introduction of a policy restricting the siting of any Liquefied Natural Gas (LNG) terminals within the jurisdiction area of Dublin City Council.

A number of submissions received request the use of sustainable design and renewable energy technologies for all new buildings. One submission seeks a new policy requesting that at the initial feasibility stage of a potential significant capital investment that energy usage is considered.

A submission received suggests expanding and supporting the possibilities for local, sustainable energy production.

One submission shows support for high density housing along with affordable clean energy through the use of hydro-power (Tolka River), solar and wind power in terms of reducing the overall carbon footprint.

Chief Executive's Response

The Chief Executive notes the submission from the Department of Environment, Climate and Communications regarding the publication of the Climate Action Plan 2021, including the specific comments relating to district heating. The Draft Plan will be updated to reflect this. In respect of the request to modify Policy CA12, the Chief Executive references Objective CA02 (Variation of Development Plan to Reflect New Guidance / Legislation). Notwithstanding this, it is considered appropriate in this instance to amend the text to reflect any forthcoming review of the 2014 OREDP.

The Chief Executive welcomes the support from the ESB. Submissions that request or support the designation of Poolbeg as a Strategic Energy Zone are noted. While the Chief Executive agrees that the Poolbeg peninsula has an important role in supporting decarbonisation of the energy utilities sector and the operations of the national grid, and supports the development of the area as a Strategic Sustainable Infrastructure hub for the city, Regional Policy Objective (RPO) 7.35 of the RSES states that the Eastern and Midland Regional Assembly (EMRA) shall, in conjunction with local authorities, identify Strategic Energy Zones as areas suitable for larger energy generating projects. Policy CA19 supports this policy position.

The matter of designating such sites is for EMRA, in conjunction with DCC. DCC looks forward to working alongside EMRA in identifying suitable locations for Strategic Energy Zones in the Dublin City area. In this context, it is not considered necessary to update the text of the Draft Plan at this juncture. However, the Chief Executive references Policy SI52 (Poolbeg Peninsula Strategic Sustainable Infrastructure Hub) which seeks to 'support the development of the Poolbeg peninsula as a Sustainable Energy and Infrastructure Hub for Dublin with a strategic role in accommodating the city's critical hard infrastructure and to recognise the significant role that it plays in facilitating Dublin's transition to a low carbon and climate resilient city.'

The Chief Executive welcomes the submission from EirGrid which generally is supportive of the Draft Plan regarding energy utilities. While the need to provide greater reference to the role of electricity transmission grid infrastructure in meeting the challenges of climate change and energy is noted, Chapter 9: Sustainable Environmental Infrastructure provides further clarity on the matter surrounding the safeguarding of the national grid infrastructure. Specifically, Policy SI49 (Support for Energy Utilities) and Objective SIO28 (EirGrid Development Strategy) are of note. Additionally, Section 3.5.8, Table 3-1 provides a brief overview of the climate action measures by chapter, including the decarbonisation of the energy sector.

With regard to the suggestion to provide more guidance on spatially suitable locations for larger energy generation and demand centres, the development of the Poolbeg peninsula as a Sustainable Energy and Infrastructure Hub is supported. Furthermore, policies CA18

(Decarbonising Zones), CA19 (Strategic Energy Zones) and CA21 (Dublin Regional Energy Masterplan) provide strategic support.

In relation to the request that a moratorium be provided on data centres and that spatial guidance be provided, Policy CEE25 (Data Centres), Chapter 14 Land Use Zoning and Chapter 15 Development Standards provides specific guidance. Section 15.14.14 states that data centres will be considered on a case by case basis. In addition, data centres are not permissible in many zoning categories. It is considered that the Draft Plan provides sufficient policies that address the matter. See also the Chief Executive's response to issues raised at Chapter 6, City Economy and Enterprise in relation to Data Centres in the context of Policy CEE25 and Chapter 15 and proposed amendments on foot of the issues raised to further strengthen the Plan text.

Policy CA16 of the Draft Plan supports the potential of district heating in Dublin City. The policy requires that all Climate Action Energy Statements submitted to the Council (see Policy CA9) 'shall include an assessment of the technical, environmental and economic feasibility of district or block heating or cooling, particularly where it is based entirely, or partially on energy from renewable and waste heat sources.' Additional information is required for significant new residential or commercial development in SDRAs and in the Docklands SDRA, which require assessing the feasibility of making the development district heating enabled, in order to make a connection to an available or developing district heating network, or in the case of Docklands, to facilitate a connection to the Dublin District Heating System.

Policy CA9 requires that 'all new developments involving 30 residential units and/or more than 1,000 sq. m. of commercial floor space, or as otherwise required by the Planning Authority, will be required to submit a Climate Action Energy Statement as part of the overall Design Statement to demonstrate how low carbon energy and heating solutions, have been considered as part of the overall design and planning of the proposed development.' The Chief Executive notes requests to modify the wording, to enhance clarity. It is considered that the current text and wording adequately and sufficiently addresses the issues raised.

In relation to the use of sustainable design and renewable energy technologies in new buildings, Policy CA9 requires the submission of a Climate Action Energy Statement, demonstrating how low carbon energy and heating solutions have been considered. Policy CA10 further supports the production of energy from renewable sources, subject to normal planning and environmental considerations. The Chief Executive considers that the matter is adequately addressed in the text and policies of the Draft Plan.

The Chief Executive notes the submission requesting the introduction of a policy restricting the siting of any Liquefied Natural Gas (LNG) terminals within the jurisdiction of DCC. The decarbonisation of the energy sector by shifting from fossil fuels to low or zero-carbon energy sources is a fundamental element of climate action policy in the Draft Plan. This is further addressed in Chapter 9: Sustainable Environmental Infrastructure. Policies CA10-CA17 address renewable energy, with Policies CA18-CA21 addressing energy initiatives, strategic energy zones and decarbonising zones. Under the recently adopted Climate Action and Low Carbon Development (Amendment) Act, there is a legal commitment for Ireland to cut its greenhouse gas emissions by 51% by 2030 and Dublin City will have a key part to play in achieving this target. Under the measures contained in the Government's Climate Action Plan 2021, in time the reliance on fossil fuels will reduce. However, in the meantime, wider energy requirements must be considered. The Development Plan must be consistent with national policy in this regard. Any proposals for LNG terminals would require planning consent and be subject to a thorough assessment, including environmental assessment. For this reason, the Chief Executive does not consider it appropriate to introduce such a policy in the Draft Plan.

In relation to the request for a new policy seeking that energy usage is considered at the initial feasibility stage of a significant capital investment project, it is considered that Policy CA9 and CA16 adequately addresses this concern. Any feasibility study that intends to inform a planning application must comply with all the relevant provisions of the Development Plan. It is therefore considered that the current text and policies adequately address this concern and no change is recommended.

Having regard to the suggestion to expand the possibilities for local energy production, Policy CA11 (Micro-Renewable Energy Production), Policy CA20 (Sustainable Energy Communities) and Section 3.5.3 – ‘Local Initiatives’ page 110, addresses this issue.

While the Chief Executive notes the submission which suggests that hydro (River Tolka), solar and wind energy be used alongside high density housing to reduce the overall carbon footprint, it is considered that Policies CA3, CA4, CA9, CA10, CA11, CA13, CA14, CA15 adequately address the substantive issue raised. The Development Plan is a strategic policy document and cannot address all area or site-specific concerns.

Chief Executive’s Recommendation

Chapter 3

Section: 3.5.3 Energy

Page: 104

Amendment:

~~(The National Climate Action Plan includes a commitment that 70% of our electricity needs will come from renewable sources by 2030. The plan states that achieving this target will involve phasing out coal and peat-fired electricity generation plants, increasing our renewable electricity, reinforcing our grid (including greater interconnection to allow electricity to flow between Ireland and other countries), and putting systems in place to manage intermittent sources of power, especially from wind.)~~

{The National Climate Action Plan includes a target to increase the share of electricity demand generated from renewable sources to up to 80% where achievable and cost effective, without compromising security of electricity supply. The plan outlines a number of measures to deliver this target including a new approach to electricity demand management, large scale investment in renewable energy generation, micro-generation and community-based projects, as well as other supporting measures.}

Chapter 3

Section: 3.5.3 Energy

Page: 106, Policy CA12

Amendment:

Policy CA12 Offshore Wind-Energy Production

To support the implementation of the 2014 ‘Offshore Renewable Energy Development Plan’ (OREDPP) {and any forthcoming review} and to facilitate infrastructure such as grid facilities on the land side of any renewable energy proposals of the offshore wind resource, where appropriate and having regard to the principles set out in the National Marine Planning Framework.

Amendment:

~~(District heating is specifically referred to in the 2019 Climate Action Plan which states in order to realise the potential of district heating the government will take action to: “ensure the potential of district heating is considered in all new developments and in particular in Strategic Development Zones (SDZs)”.~~

~~Furthermore, Action 70 of the Climate Action Plan states that the government will “support the delivery of two district heating projects under the Climate Action Fund”, one of which is the Dublin District Heating System (DDHS) centred at Poolbeg and the Docklands.)~~

{The 2021 National Climate Action Plan is highly supportive of the development of district heating and includes a specific target to deliver up to 2.7 TWh of district heating, with the exact level to be informed by the outcome of a National Heat Study.

The Climate Action Plan includes specific actions relating to district heating including Action 183 “to ensure that national, regional and local planning frameworks encourage and facilitate the development of district heating where appropriate to facilitating compact urban development”.

The Climate Action Plan refers to the ongoing work being carried out to inform the development of district heating policy, including the completion of the comprehensive assessment to support the rollout of district heating in Ireland. It also refers to two district heating projects in development, one of which is the Dublin District Heating System (DHS) centred at Poolbeg and the Docklands.}

Amendment:

Decarbonising Zones

Action ~~(165)~~ {80} of the ~~(2019)~~ Climate Action Plan ~~(also)~~ {2021} identified the need to engage at a local level and included a specific action which requires Local Authorities to identify and develop plans for at least one Decarbonising Zone (DZ) in their administrative area.

Section 3.5.4 Waste

Summary

A number of submissions support the circular economy with one submission requesting that an increased focus on the circular economy is needed. Some submissions raised concerns relating to waste collection and management and the availability of mixed bins. One submission noted that recycling should be on a not-for-profit basis.

Chief Executive's Response

The Chief Executive notes the submissions received relating to the circular economy and the request for an increased focus. As stated in Section 3.5.4, Chapter 9: Sustainable Environmental Infrastructure as well as Chapter 15: Development Standards, the Draft Plan seek to integrate a more sustainable approach to waste based on circular economy principles. Furthermore, Policy CA22 (Circular Economy) seeks 'to support the shift towards the circular economy approach as set out in 'a Waste Action Plan for a Circular Economy 2020 to 2025, Ireland's National Waste Policy, or as updated.' It is considered that this matter is adequately addressed in the Draft Plan. Issues relating to waste collection, management and recycling are operational matters and outside the scope of the Development Plan.

Chief Executive's Recommendation

No change is recommended as existing text satisfactorily responds to issues raised.

Section 3.5.5 Sustainable Transport

Summary

A number of submissions were received regarding EV charging.

The ESB submission acknowledges the support for electric vehicles in the Draft Plan and references the commitments made in the Climate Action Plan 2021. Policy CA24 and objective CA04 are noted. The EU Energy Performance of Buildings Directive is also noted and it is suggested that an opportunity exists to review standards for EV charging in the Development Plan.

Some submissions raised concerns relating to street clutter and the potential impact on vulnerable pedestrians. Others noted that there is a lack of provision in general. One submission seeks a new policy providing a solution for residents who must use on-street parking. It is also suggested that Dublin City Council develop a specific strategy for providing on-street EV charging for residents.

Chief Executive's Response

The Chief Executive welcomes the support from the ESB in relation to the Draft Plan. In order to reflect the Climate Action Plan 2021, it is considered appropriate to update text to reflect current targets. Chapter 8: Sustainable Movement and Transport sets out a detailed strategy that supports transitioning to low carbon mobility solutions including the decarbonisation of vehicles and a regional strategy for EV charging.

The Chief Executive notes the concerns raised relating to street clutter and the potential negative impact on pedestrians and in particular vulnerable users. Policy CA24 supports the provision of EV charging infrastructure 'subject to appropriate design, siting and built heritage considerations' and having regard to the Planning and Development Regulations (2001) as amended, which have been updated to include EV vehicle charging point installation. Furthermore, Policy SMT10 seeks to improve the pedestrian network for all users including people with mobility impairment and/or disabilities, including the elderly and people with children. It is considered that the current policy provisions adequately address the concerns raised.

Regarding current and future provision of EV charging infrastructure, the Draft Plan contains a number of policies/objectives which support this (Policy CA24, Objective CA04, Policy SMT27). Specifically, Objective CA04 seek to 'support and implement the forthcoming Regional Strategy for Electric Vehicle (EV) charging over the lifetime of the Plan in order to facilitate the transition to low carbon vehicles required to achieve 2030 national targets.' It is considered that the Draft Plan sufficiently addresses the concerns raised.

See also Chapter 8 and Chapter 15 for Chief Executive's response to further related substantive issues received regarding EV charging and parking under the relevant chapter headings.

Chief Executive's Recommendation

Chapter 3

Section: 3.5.5 Sustainable Transport, subsection on 'Decarbonising Transport and Electric Vehicles (EVs)'

Page: 114

Amendment:

Decarbonising Transport and Electric Vehicles (EVs)

The ~~(2019)~~ {2021} National Climate Action Plan calls for the combination of measures to influence the spatial pattern of development, urban structure and overall mobility, with low carbon technology measures, such as a significant increase in the EV fleet.

Chapter 3

Section: 3.5.5 Sustainable Transport, subsection on 'Decarbonising Transport and Electric Vehicles (EVs)'

Page: 114

Amendment:

Decarbonising Transport and Electric Vehicles (EVs)

The Plan sets out a government target to accelerate the take up of EV cars and vans so that ~~(Ireland reaches 100% of all new cars and vans being EVs by 2030. This that means approximately one third of all vehicles sold during the decade will be Battery Electric Vehicles (BEV) or Plug-in Hybrid Electric Vehicles (PHEV).)~~ {by 2030, there will be 945,000 EVs and low emitting vehicles (LERVs) on the road.}

Section 3.5.6 Flood Resilience and Water

Summary

Concerns are raised in some submissions regarding the future development of Poolbeg and that with climate change, that this area will potentially be flooded. One submission raises concerns regarding the maintenance of gullies and need for regular street cleaning to avoid flooding.

Chief Executive's Response

The future development of Poolbeg is fully addressed under the Poolbeg West Planning Scheme adopted in 2019. This is a separate statutory plan to the Dublin City Development Plan. The

Planning Scheme was subject to a comprehensive Strategic Flood Risk Assessment (SFRA). Maintenance of the street and surface water networks is an operational matter, outside the remit of the Development Plan.

Chief Executive's Recommendation

No change is recommended as existing text satisfactorily responds to issues raised.

Chapter 4: Shape and Structure of the City

Chapter 4: Shape and Structure of the City

Submission Number(s):

0003, 0006, 0156, 0291, 0326, 0454, 0594, 0673, 0693, 0742, 0853, 0887, 0939, 1017, 1022, 1028, 1056, 1075, 1081, 1082, 1083, 1124, 1137, 1147, 1153, 1176, 1187, 1191, 1194, 1201, 1207, 1238, 1275, 1327, 1350, 1352, 1353, 1358, 1386, 1397, 1402, 1406, 1407, 1448, 1472, 1477, 1480, 1482, 1523, 1553, 1557, 1560, 1576, 1604, 1621, 1638, 1645, 1676, 1679, 1682, 1697, 1698, 1700, 1701, 1704, 1732, 1733, 1750, 1755, 1771, 1784, 1786, 1799, 1805, 1809, 1811, 1818, 1826, 1827, 1834, 1843, 1844, 1848, 1850, 1864, 1875, 1884, 1960, 1961, 1972, 2072, 2085, 2087, 2095, 2120, 2121, 2127, 2129, 2139, 2144

Section 4.2 Achievements

Summary

A submission from the Grangegorman Development Agency suggests updated text regarding the progress of development at the TU Dublin campus. It also requests updated references to TU Dublin.

Chief Executive's Response

The CE notes the request by the Grangegorman Development Agency, and whilst in the interests of brevity a detailed description of progress to date on the campus is not considered necessary, it is recommended that some text updates are appropriate. The CE recommends that further references to the TU Dublin campus will be updated in Chapter 13. The correct title of TU Dublin will be updated throughout the plan.

Chief Executive's Recommendation

Chapter 4

Section: 4.5.1 Approach to the Inner City and Docklands

Page: 136

Amendment:

The development of the new university, ~~(in this area and the provision of other services and facilities connected with it, has anchored)~~ {health, education facilities and public amenities for the existing and emerging communities of the Grangegorman neighbourhood is beginning to anchor} the ongoing regeneration of this part of the city.

Section 4.4 The Strategic Approach

Summary

A number of submissions, including that by the Dublin Cycling Campaign, voice support for the 15-minute city. The importance of the KUV's in realising this model is noted in some submissions. The HSE welcomes the proactive policies regarding healthy placemaking.

Some submissions raise concerns regarding the increasing centralisation of planning through ministerial guidelines and call for the abolition of SPPR's (Specific Planning Policy Requirements).

In terms of the spatial structure of the city, a submission seeks the expansion of the city to the east to the Poolbeg power station to accommodate additional housing. Another submission seeks clarity regarding the definition of the term 'city' throughout the plan.

A number of submissions raise concerns regarding the redevelopment of Tolka Park and that the Z9 zoning pertaining to the site should be retained.

One submission seeks that Chapter 4 makes explicit reference to the importance of micro mobility as a key enabler of the 15-minute city. Another seeks references to the circular economy in Chapter 4.

Concern is raised in one submission regarding the statutory process of advertising planning applications in newspapers and this should be replaced with a neighbour notification system.

Chief Executive's Response

Much of Poolbeg is characterised by industrial and infrastructural development and its strategic importance in this regard, is addressed under section 9.5.12 of the Draft Plan. Policy SI52 designates Poolbeg as a Sustainable Infrastructure Hub and in this context, it is not considered appropriate land for housing development. Significant lands are designated as a Strategic Development Zone at Poolbeg West and it is envisaged that this area will accommodate between 3,000 and 3,500 residential units.

The concerns raised regarding SPPR's in a number of submissions are noted. However, Section 10 (1) (A) of the Planning and Development Act explicitly states that the written statement of the Development Plan and the Core Strategy must be consistent with the Specific Planning Policy Requirements specified in the guidelines under section 28. SPPR's are not discretionary and the Planning Authority must have regard to them in exercising its planning functions.

The inner and outer city is clearly defined on Map K and in the glossary to the Draft Development Plan. It is considered that the delineation of the two areas is appropriate and ensures a consistent approach that has been adopted in successive development plans.

The CE's response to zoning matters pertaining to Tolka Park and its future development are addressed under Zoning Maps.

Micro mobility is addressed comprehensively in section 8.5.6, page 296 and in policy SMT22 and objective SMTO18. The circular economy is addressed in detail under section 9.5.5 of the Draft Plan.

The requirements for statutory public notices with regard to planning applications is addressed through the Planning and Development Regulations 2001, as amended and is outside the scope of the Development Plan.

Chief Executive's Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Section 4.5.1 Approach to the Inner City and Docklands

Summary

A number of submissions welcome the policy approach to the inner city and Docklands. Concerns are raised in a submission regarding the quality of the public realm and the need for enhanced walking and cycling facilities in the NEIC.

The submission by Dublin Port welcomes the provisions of the Draft Plan regarding Dublin Port and the recognition of its economic importance to the city. It is requested that policy SC7 is updated to refer to the Dublin Port Masterplan 2040. A submission outlines support for Dublin Port but states that further expansion is not necessary and that the Dublin Port lands are not suitable for housing having regard to flood risk. Other submissions call for the role of Dublin Port to be re-examined and that port lands should be utilised for housing.

Concerns are raised in some submissions regarding the future development of Poolbeg and that with climate change, that this area will potentially be flooded.

Some submissions seek the inclusion of Phibsborough in the policies regarding the inner city. A number of submissions seek greater protection for Phibsborough and in particular, that sensitive areas along the canal should be protected.

A number of submissions raise concerns regarding the growth of the BTR sector in the city and the impact that this is having on the creation of long-term sustainable communities. A number of submissions suggest that there should be an increase in residential development in the city. There is a call in many of the submissions for more family housing, more diverse housing mix and secure owner-occupied accommodation in the city. A number of submissions reference the over dominance of certain land uses such as office, tourist accommodation/short term lets and co-living in the city. A number of submissions express considerable concern regarding overconcentration of such land uses in the Dublin 8 area.

One submission seeks a modification to Policy SC2 to refer to the residential potential of the north and south Georgian squares and that office accommodation should be curtailed; and that both areas should be identified as districts of national built heritage significance and promoted for investment of cultural infrastructure. It is submitted that policy SC3 should be modified to promote the conversion of upper floors to residential use. It is also suggested that the south Georgian core is added to list of inner-city communities.

One submission supports the policy provisions under Policy SC4 but states that it should be more explicit so that it refers to cultural spaces across the city areas. One submission seeks modification to policy SC5 to 'insist' that high quality architecture and urban design is achieved.

One submission highlights the need to modify policies in the Plan to expand the reference to the civic spine to include Parnell Square and Christchurch Cathedral.

Chief Executive's Response

In relation to the NEIC, the Draft Plan includes a suite of policies to promote walking and cycling in Chapter 8 including those set out under section 8.5.6 Sustainable Modes. In addition, the NEIC is identified as an SDRA in Chapter 13, section 13.12, where a number of guiding principles are set out regarding green infrastructure and movement and transport. The latter section specifically encourages enhanced cycling and public realm enhancement and

interventions. The NEIC has also been identified as a priority area for the preparation of an LAP (Chapter 2, Table 2-13) and it is envisaged that this plan will further address matters relating to the quality of the public realm and walking and cycling facilities over the life of the plan.

The comments regarding the importance of Dublin Port are welcomed having regard to its strategic importance to the city. Given this importance, it is appropriate for City Council to continue to support the operations of the port in accordance with the Dublin Port Company Masterplan 2040, as set out under Policy CEE35 in Chapter 6. Further commentary on this issue is set out under Chapter 6. The CE considers that it is appropriate to update policy SC7 and CEE35 to correctly refer to the Dublin Port Masterplan 2040 and recommends an amendment in this regard.

The future development of Poolbeg is fully addressed under the Poolbeg West SDZ Planning Scheme adopted in 2019. This is a separate statutory plan to the Dublin City Development Plan. The Planning Scheme was subject to a comprehensive strategic flood risk assessment.

The Draft Plan clearly defines descriptions of what constitutes the inner city and inner suburbs in the Glossary. Phibsborough is an urban village and is considered to form part of the inner suburbs not the inner city. Phibsborough is one of a number of urban villages which are protected by a suite of policies set out throughout the Draft Plan, including a detailed chapter on built heritage and archaeology in Chapter 11. The area along the Royal Canal is designated a conservation area, with detailed policies set out under section 11.5.3 of the Draft Plan and under policies BHA9 and BHA10.

The concerns raised in a number of submissions regarding the growth of the BTR sector are noted. This matter is comprehensively addressed under the response to the OPR and also under the CE response in Chapter 5. A range of policies are proposed in Chapters 5 and 6 of the Draft Plan to ensure a more balanced mixed approach to development in the city with regard to BTR, hotel development, short term lets and temporary accommodation.

With regard to additional policies regarding the south Georgian core, it is considered that the issues raised relating to upper floor use and more residential development in the inner city are fully addressed elsewhere in the Plan. Of particular relevance are policies BHA24 – reuse and refurbishment of historic buildings, BHA25 - loss of upper floor access, BHA14 - mews, QHSN6 – upper floors, QHSN7 – reduction of vacancy and CCUV18 – residential development.

It is also noted that all Georgian areas of the city – both northside and southside, are zoned Z8 under the zoning objectives of the Plan. The Z8 zoning has a focus on the need to facilitate regeneration, cultural uses and appropriate residential development whilst managing the concentration of office uses in these areas. Both core Georgian areas of the city are also identified as important cultural quarters with relevant policies set out under CU7, 8 and 9. Section 15.15.2.2 specifically addresses development in conservation areas as does policy BHA9. The South Georgian Townhouse Re-Use Guidance Document commissioned by Dublin City Council (March 2019) sets out a range of possible solutions for the adaptation, densification and conversion of some typical Georgian town houses. Notwithstanding the fact that the study is based on the South Georgian Area, it is intended that the guidance principles are transferrable to other Georgian areas of the city. The document is specifically referenced in the Draft Plan. In this regard, it is considered that the appropriate use of Georgian buildings in the city and their protection is comprehensively addressed in the Draft Plan both through policy and zoning objectives.

It is considered that the Draft Plan sufficiently addresses the matter of cultural spaces throughout the city. A range of policies and objectives are set out under Chapter 12. Of particular note are CU12 – cultural spaces and facilities, CUO23 – demolition or replacement of a use of cultural value, CUO21 – masterplan and CUO22 – SDRA's and large-scale developments.

Comments with regard to the provision of high-quality architecture and urban design are noted. However, it is considered that this matter is adequately addressed through the policy provisions of the plan and in particular, the requirement under Chapter 15, section 15.5.8 to prepare architectural design statements in support of significant planning applications.

The civic spine is clearly defined in the glossary as “A route through the city centre along which the city's primary civic, cultural and historic attractions are located. The route is from Parnell Square, through O'Connell Street, College Green to Christchurch Place with a southern extension from College Green to Grafton Street and Stephen's Green and an eastern extension from College Green to Merrion Square.” In this context, no modification to the existing policies is recommended.

Chief Executive's Recommendation

Chapter 4

Section: 4.5.1 Approach to the Inner City and Docklands

Page: 139, Policy SC7

Amendment:

Policy SC7 Dublin Port

To support and recognise the important national and regional role of Dublin Port in the economic life of the city and region and to facilitate port activities and development having regard to the Dublin Port Masterplan ~~(2012-)~~ 2040.

Section 4.5.2 Approach to the Inner Suburbs and Outer City as Part of the Metropolitan Area

Summary

A number of submissions raise concerns about recent significant growth in the Santry area; the need for a coherent planning framework for this area and that development should occur in tandem with the requisite infrastructure. One submission raises concerns that there is a lack of policy provisions for the development of the inner suburbs.

Chief Executive's Response

The concerns regarding Santry are noted and largely stem from a number of Strategic Housing Developments that have been permitted in the area. However, it is the CE view that as a Key Urban Village, Santry is an area that is appropriate for intensification and compact growth. Santry has been identified as an area for the preparation of an LAP in Table 2.14. It is considered that the matter of social and community infrastructure is comprehensively addressed under policies QHSN45 – high quality neighbourhood and community facilities and QHSN46 – community and social audit.

Chief Executive's Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Section 4.5.3 Urban Density

Summary

A number of submissions support the approach to density and compact growth set out in the Draft Plan and concur that increased building heights and appropriate density should be actively encouraged and be located in close proximity to public transport. Some highlight the importance of increased height and density in achieving the housing targets set out in the plan. Another submission seeks a modification to Policy SC10 to compare to comparable densities in a number of European cities and a number of submissions highlight that higher density does not necessarily equate to higher buildings.

Submissions suggest that density in the city could be increased through greater densification on infill sites, and particularly through measures such as extensions, additional floors, house subdivisions and building in gardens. Other submissions suggest that greater density and city living can be achieved through the use of upper floors, by activation of derelict sites and through reuse and retrofitting of existing building stock. One submission suggests proactive use of vault space within viaduct structures in the city. Other submissions seek more explicit policy provisions regarding housing mix.

Chief Executive's Response

The submissions in support of the approach to density in the Plan are noted and welcomed by the CE.

Comments regarding densification on infill sites and upper floor use are noted. In this regard, Chapter 5, section 5.5.2 Regeneration, Compact Growth and Densification includes a number of policies to support this approach including QHSN5 - urban consolidation and QHSN6 - upper floors.

It is a specific objective under QHSNO4 to support the ongoing densification of the suburbs and prepare a design guide regarding innovative housing models, designs and solutions for infill development, backland development, mews development, re-use of existing housing stock and best practice for attic conversions; and under QHSNO6 to draft additional upper floor building re-design guidelines that are sufficiently innovative and flexible to promote the residential use of vacant upper floors. It is considered, therefore, that there are comprehensive policies and objectives in the Draft Plan to support and address the issues raised.

The matter of density is fully addressed in Appendix 3 and it is considered that Appendix 3, section 3.2 and diagram 1 on page 221 adequately address the relationship between height and density.

Policy SC12 addresses the matter of housing mix. The issue of housing mix is also comprehensively addressed under section 5.5.7 and policy QHSN36 – housing and apartment mix and it is considered that this issue is adequately addressed in the Draft Plan.

Chief Executive's Recommendation

No change is recommended to Chapter 4 as existing text satisfactorily responds to issues raised. Please also refer to the CE response to Appendix 3.

Section 4.5.4 Increased Height as Part of the Urban Form and Spatial Structure of Dublin

Summary

A number of submissions were made regarding the policy approach to building height in the city. Some sought the retention of relatively low-rise height thresholds and that certain parts of the city, such as Phibsborough, should be specifically designated as low-rise areas and identified in policy terms. Some outlined the need to reinforce the intrinsic human scale of the city. Concerns are raised by the Irish Georgian Society that inadequate consideration has been given to built heritage in the consideration of proposals for increased height and that more explicit reference to built heritage and conservation considerations should be made in policies SC14 and SC18.

Other submissions seek a more ambitious approach to building height. For example, the IHBA consider that the new plan should take a more positive approach to promoting height across the city and that additional height should be actively considered in all locations subject to compliance with the criteria set out in Appendix 3. One submission states that there should be no cap on heights in Strategic Development Zones.

Concerns are raised in some submissions regarding the requirement for masterplan for sites over 0.5 ha and suggests this should be changed to a requirement for a design statement or development strategy document. Other submissions require that masterplans are prepared for specific sites in the city, particularly in Rathmines.

Some submissions seek the development of more land mark buildings in the city and that these should be of the highest architectural quality and designed through architectural competitions. Concerns are raised on one submission regarding the embodied carbon in taller buildings.

One submission calls for the removal of reference to SPPR's in policies SC15 and SC16.

A submission from the Dublin Airport Authority seeks an amendment to policy SC17 to ensure the safety of aircraft operations at and into Dublin Airport.

Chief Executive's Response

The CE's detailed response to submissions relating to height are set out under Appendix 3. It is considered that the building height strategy sets out a balanced and measured approach to the promotion of appropriate height and density in the city in accordance with The Urban Development and Building Height Guidelines for Planning Authorities. Section 6.0 in Appendix 3 comprehensively and specifically addresses the issue of higher buildings in areas of historic sensitivity. In this context, no amendments are considered necessary to the policy provisions set out in Chapter 4, section 4.5.4.

With regard to height within Strategic Development Zones, the provisions of same are set out under section IX of the Planning and Development Act 2000 as amended. It is a requirement under the Act for a Planning Scheme to be prepared for SDZ areas. Under section 168(2) (c), it is stated that the scheme should set out proposals in relation to the overall design of development, including the maximum heights. In this regard, the Development Plan cannot

circumvent the provisions of the Planning Act in relation to building height thresholds in an SDZ scheme.

The CE response to the requirement for masterplans for sites over 0.5 ha is addressed under the response to the submission by the OPR. It is recommended that policy SC17 is updated to increase the threshold to 1ha. It is envisaged that having regard to this requirement, masterplans for specific sites detailed and requested in some of the submissions would form part of future planning applications for such sites and would be addressed at the implementation stage of the plan.

The policy provisions regarding landmark buildings are set out in detail in section 5 of Appendix 3 and in particular, Table 4, page 237. The requirement for exemplary architecture and sustainable design and green credentials are outlined as key performance criteria for the assessment of such proposals.

As noted above, it is not considered appropriate to remove references to SPPR's as the Planning Authority are obliged to comply with National Policy Guidelines. Policy SC16 contains a wording error which shall be corrected.

The submission by the DAA is noted and the CE recommends a textual amendment to policy SC17 to address their request to ensure the safety of aircraft operations.

Chief Executive's Recommendation

Please refer to the CE response to Appendix 3.

Chapter 4:

Section: 4.5.4 Increased Height as Part of the Urban Form and Spatial Structure of Dublin
Page: 148, Policy SC16

SC16 Building Height Locations

To recognise the predominantly low rise character of Dublin City whilst also recognising the potential and need for increased height in appropriate locations including the city centre, Strategic Development Zones, Strategic Development Regeneration Areas, Key Urban Villages and other locations as identified in Appendix 3, provided that proposals ensure a balance **{with}** **(between)** the reasonable protection of existing amenities and environmental sensitivities, protection of residential amenity and the established character of the area.

For amendments to Policy SC17, please see response to OPR.

4.5.5 Urban Design and Architecture

The submission from An Taisce seeks an additional policy regarding the protection of important views and view corridors and to protect existing landmarks. Some submissions, including that by the OPW, seek the addition of a number of additional protected views to Figure 4.1.

Submissions also state that the Draft Plan inadequately addresses the importance of the Liffey Quays and that there needs to be better preservation of them. Other submissions consider that quality urban design and architecture is neglected in the city and another that there should be greater emphasis on the need to preserve the city's architectural heritage. A number of submissions highlight the importance of good urban design.

Chief Executive's Response

The landscape of the city is given extensive protection under section 10.5.3 of the Draft Plan. Policy GI20 in particular states: "Views and Prospects: To protect and enhance views and prospects which contribute to the appreciation of landscape and natural heritage". It is also an objective of the plan under objective GIO17 to "undertake a 'Views and Prospects' study to identify and protect the key views and prospects of the city. Additional views and prospects may be identified through the development management process and local area plans." It is considered, therefore, that any additional views to be protected will be addressed by way of a further detailed study at the implementation stage of the Plan.

Specific acknowledgement and policy regarding the River Liffey are set out under GI33 which states "River Liffey: To recognise the unique character, importance and potential of the River Liffey to the city and to protect and enhance its civic, ecological, amenity, historical and cultural connections. To promote the sustainable development of this key resource for amenity and recreational uses in and along the river and its development as a green corridor in the city". It is also of note that the entirety of the city quays is located within a conservation area and specific protection in this regard, is provided for under Chapter 11 in section 11.5.3 Built Heritage Assets of the City and specifically Policy BHA9.

Comprehensive policies regarding architectural quality and urban design are set out in section 15.4.2 of the Draft Plan, with a requirement for architectural design statements set out under section 15.5.8. Chapter 11 contains detailed policies and objectives pertaining to the protection and preservation of the city's important built heritage assets.

Chief Executive's Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Section 4.5.6 The Public Realm

Summary

A number of submissions are made relating to the public realm, with some expressing support for public realm improvements and enhancements. One submission requests the development of specific design standards for street furniture. Other submissions such as that from Dublin Town state that street clutter should be reduced. Many of the submissions reference the importance of pedestrianisation to enhance the public realm; that there is a need for more public seating and public toilets in the city and that there should be 'gender proofing' of the public realm.

The commitment of the Draft Plan to adopting a Universal Design approach to the public realm is welcomed by the NCBI and it is requested that they be consulted in relation to public realm proposals in the city, and that the plans objectives regarding healthy placemaking and public realm strategies are extended throughout the city. Concerns are raised in some submissions regarding the loss of street paving on Castlemarket Street. A submission by the RIAI proposes that a Universal Design Statement using a prescribed template is a requirement for all planning applications that impact on the public realm and that the design statement for large scale residential and commercial development proposals should include a Universal Design Statement.

Chief Executive's Response

The Draft Plan includes a suite of policies to promote and support a safe, inclusive and accessible public realm. In particular, detailed policies are set out in the Draft Plan under Chapter 7 – section 7.5.8 Public Realm. The CE's substantive response to submissions regarding the public realm are set out under this section of the report.

The CE notes that policies CCUV37 - plan active and healthy streets, CCUV38 - high quality streets and spaces, CCUV39 - permeable, legible and connected public realm and CCUV42 - public realm - Key Urban Villages/Urban Villages are of note. Specifically, Policy CCUV38 promotes the development of high-quality streets and public spaces which are accessible and inclusive in accordance with the principles of universal design, and which deliver vibrant, attractive, accessible and safe places and meet the needs of the city's diverse communities regardless of age, ability, disability or gender which is applicable to the entire functional area of the city. These policies apply on a city-wide level. The issues raised regarding Universal Design by the RIAI are noted and this matter is addressed under the CE response in Chapter 5. The issue of gender proofing is addressed under objective CCUVO14 City Centre Public Realm Strategy and also through objective QHSNO8 – women's and girl's safety in the public realm.

Consultation on the implementation of public realm projects is an operational matter and outside the scope of the Development Plan.

It is an objective of the Plan to reduce street clutter such as poles and signage (p. 267). The installation of street furniture is an operational matter and outside the scope of the Development Plan. With regard to street clutter, Policy CCUV45 specifically addresses the removal of unauthorised advertising structures and Objective CCUVO20 states that it is an objective of the city council to carry out an audit of redundant signage and unused poles in the public realm in order to reduce street clutter and to investigate measures to promote co-sharing and integration with other street furniture elements.

Public seating is addressed comprehensively in Chapter 7 of the Draft Plan, particularly under objectives CCUVO19 civic amenities and CCUVO14 City Centre Public Realm Strategy. The provision of public toilets is addressed under Policy CCUVO19 – civic amenities.

Removal, maintenance and repair of street paving is an operational matter and is outside the scope of the Development Plan.

Chief Executive's Recommendation

No change is recommended as existing text satisfactorily responds to issues raised.

Chapter 5: Quality Housing and Sustainable Neighbourhoods

Chapter 5: Quality Housing and Sustainable Neighbourhoods

Submission Number(s):

0115, 0253, 0351, 0392, 0413, 0465, 0498, 0512, 0591, 0594, 0596, 0605, 0638, 0642, 0673, 0678, 0691, 0692, 0727, 0742, 0743, 0752, 0814, 0815, 0823, 0825, 0830, 0853, 0887, 0890, 0917, 0922, 0934, 0939, 0949, 0953, 0962, 0963, 0969, 0971, 0973, 0979, 0980, 1007, 1011, 1015, 1017, 1018, 1025, 1033, 1038, 1053, 1055, 1056, 1064, 1068, 1075, 1076, 1082, 1083, 1089, 1090, 1093, 1095, 1096, 1123, 1130, 1134, 1137, 1148, 1153, 1157, 1158, 1168, 1187, 1191, 1194, 1195, 1201, 1204, 1222, 1230, 1238, 1249, 1264, 1275, 1293, 1298, 1304, 1306, 1307, 1309, 1310, 1327, 1353, 1380, 1382, 1383, 1386, 1390, 1397, 1406, 1420, 1440, 1442, 1444, 1455, 1457, 1460, 1468, 1472, 1482, 1493, 1496, 1507, 1523, 1524, 1530, 1536, 1540, 1553, 1555, 1556, 1557, 1568, 1576, 1579, 1592, 1594, 1598, 1603, 1612, 1617, 1620, 1629, 1633, 1639, 1640, 1645, 1647, 1653, 1674, 1679, 1681, 1682, 1694, 1697, 1698, 1700, 1701, 1704, 1721, 1725, 1729, 1734, 1740, 1742, 1743, 1744, 1750, 1753, 1755, 1757, 1768, 1769, 1770, 1771, 1772, 1773, 1783, 1784, 1785, 1793, 1797, 1799, 1801, 1808, 1809, 1810, 1811, 1825, 1826, 1827, 1834, 1838, 1840, 1843, 1845, 1849, 1850, 1852, 1853, 1862, 1868, 1871, 1872, 1874, 1882, 1884, 1960, 1961, 1971, 1972, 1973, 2058, 2084, 2086, 2087, 2095, 2112, 2119, 2120, 2121, 2127, 2128, 2129, 2133, 2138, 2139, 2144, 2145, 2146

Section 5.5.1 National and Regional Policy Context and the Housing Strategy

Summary

Several submissions request that Policy QHSN2 should include reference to the Urban Development and Building Height Guidelines for Planning Authorities (2018).

Chief Executive's Response

The CE recommends that Policy QHSN2 is amended to include reference to the Urban Development and Building Height Guidelines for Planning Authorities (2018).

Chief Executive's Recommendation

Chapter 5

Section 5.5.1 National and Regional Policy Context and the Housing Strategy

Page: 163

Amendment:

Policy QHSN2 National Guidelines

To have regard to the DEHLG Guidelines on 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007), 'Sustainable Urban Housing: Design Standards for New Apartments' (2020), 'Sustainable Residential Development in Urban Areas' and the accompanying 'Urban Design Manual: A Best Practice Guide' (2009), Housing Options for our Ageing Population ~~(2020)~~ (2019, the Design Manual for Quality Housing (2022), (and) the Design Manual for Urban Roads and Streets (DMURS) (2019) {and the Urban Development and Building Height Guidelines for Planning Authorities (2018)}.

Section 5.5.2 Regeneration, Compact Growth and Densification

Summary

A number of submissions support the Living City Initiative and emphasise the importance of promoting the conversion of upper floors. One submission requests that Section 5.5.2 be amended to include that the Council will work with community lands trusts to purchase freeholds of underused properties in order to finance and oversee redevelopment.

Another submission requests that the Living City Initiative should be expanded to include Broadstone and that Policy QHSN06 in regard to upper floor building design should be expanded to encourage renovation by the private sector or compulsory purchase by the City Council.

A number of submissions request that Objective QHSNO1 be amended to include that priority will be given to social and affordable housing tenure of which, 50% will be secure leasehold ownership where the freehold is retained by the LDA, DCC or another public purpose organisation such as a community land trust and that the City Council work with Approved Housing Bodies on Council owned lands where appropriate to deliver social and affordable housing.

Transport Infrastructure Ireland (TII) and the Inland Waterways Association of Ireland (IWAI) make submissions in regard to Objective QHSNO2 Lands at Alfie Byrne Road. TII request that the masterplan for lands at Alfie Byrne Road includes engagement with TII as Dublin Port Tunnel runs beneath the lands. The IWAI requests that the range of proposed uses at this location should include marine and boating related leisure activity plus a leisure/recreational marina as the area is currently the location of a community-based traditional boat building activity.

A submission requests that a new objective is provided in association with Policy QHSN4 Key Regeneration Areas for the City Council to develop a set of standards for log cabins in conjunction with Dublin Fire Brigade. In regard to policy QHSN7 a number of submissions request that the City Council should work closely with the new vacancy unit being established within the DHLG&H and be proactive in reducing commercial vacancy by supporting the use of vacant premises and should utilise its compulsory purchase powers to address vacancy of residential properties.

A submission seeks a policy and objective be provided to designate additional special protected zoning status for roads which are utilised as corridors, supporting healthy city outcomes and access to safe public realm. In regard to Policy QHSN8 (Active Land Management), a submission states that the City Council must take advantage of the new powers which the recently published General Scheme of the Land Value Sharing and Urban Development Zones' Bill will provide and avoid any rezonings in advance of the coming into force of this new legislation.

A number of submissions raise other issues including reform of the commercial rates system, enforcement of the vacant sites levy, funding and creating a Housing Regeneration Unit within the Housing and Community departments of DCC.

Chief Executive's Response

The CE notes and welcomes the support for the Living City Initiative. Policy QHSN8 includes the promotion of residential development through active land management which will include land acquisition to assist regeneration and can provide for the Council to work with community lands trusts.

The Special Regeneration Area identified for the Living City Initiative in Dublin City is designated by Order of the Minister for Finance and the specific locations are not a matter for the Draft Plan. Objective QHSNO6 in regard to upper floor building design seeks to promote the residential use of vacant upper floors and Section 5.5.2, Section 2.7.2 and Objective CSO11 of Chapter 2 Core Strategy identify that the use of Compulsory Purchase Orders will be pursued as a possible active land management measure.

The tenure of social and affordable housing development on City Council owned land is addressed in Section 5.5.6 and policies QHSN32 and QHSN33 of the Draft Plan. These seek to promote the provision of social, affordable purchase, cost rental and rental housing in accordance with the Council's Housing Strategy, Part V of the Planning and Development Act, as amended by the Affordable Housing Act 2021 and to support local authorities, approved housing bodies and other sectoral agencies in the provision of a greater diversity of housing type and tenure, including social and affordable housing, new models of cost rental and affordable homeownership and co-operative housing.

The submissions from Transport Infrastructure Ireland (TII) and the Inland Waterways Association of Ireland in regard to Objective QHSNO2 Lands at Alfie Byrne Road are noted. Preparation of the masterplan will include consultation with stakeholders including the TII and Irish Rail and it is recommended that the objective is amended to include reference to marine and boating related leisure activities.

Appendix 18 of the Draft Plan provides guidance and standards relating to ancillary residential accommodation including residential extensions, detached habitable rooms, porches, alterations at roof level/attics/dormers /additional floors, sub-division of dwellings, ancillary family accommodation, home based economic activities and demolition and replacement dwellings. Also, Objective QHSNO4 (Densification of Suburbs) provides for the Council to research and publish a design guide for innovative housing models, including backland development, which adequately addresses this issue.

As set out in Section 5.4 of the Draft Plan the City Council will promote regeneration by engaging in active land management including utilising the Vacant Sites Register, the Dublin Housing Task Force and Dublin City's Regeneration Programme and Policy QHSN4 states that it is the policy of the City Council to promote area regeneration in parts of the city which require physical improvement and enhancement. The City Council will engage with the Department of Housing, Local Government and Heritage in terms of promoting measures to reduce vacancy which are addressed under policies QHSN7, CEE20 and CCUV13 of the Draft Plan.

Policies SC8 and SC9 of the Draft Plan support the development of the inner suburbs and outer city in accordance with the strategic development areas and corridors set out under the Dublin Metropolitan Area Strategic Plan. In regard to Policy QHSN8 (Active Land Management), the Council will comply with the legislation regarding the General Scheme of the Land Value Sharing and Urban Development Zones', once enacted, however in the preparation of the Draft Plan and consideration of zoning objectives, the City Council must comply with the statutory timelines for the making of the Development Plan.

Issues raised in regard to reform of the commercial rates system, enforcement of the vacant sites levy, funding and creating a Housing Regeneration Unit within the Housing and Community departments of DCC are considered to be outside the scope of the Development Plan.

Chief Executive's Recommendation

Chapter 5

Section: 5.5.2 Regeneration, Compact Growth and Densification

Page: 166

Amendment:

Objective QHSNO2 Lands at Alfie Byrne Road

It is an Objective of Dublin City Council: To undertake a land use and landscape masterplan for the underutilised lands located south east of Clontarf Road Railway station and railway line and fronting onto Alfie Byrne Road to examine their potential for the following uses:

- suitable developments to provide overlooking of the route to Clontarf Road Railway station;
- upgraded coastal walkway linking to the Tolka River;
- **{marine related leisure activities and}** improved access and setting for the watersports centre;
- provision of new fire station;
- possible site for new second level school;
- provision of new allotment and community gardens; and
- demarcation and preservation of a circus/funfair location for occasional use.

Section 5.5.3 Healthy Placemaking and the 15-Minute City

Summary

Several submissions support the policy provisions in regard to the 15-minute city under Policy QHSN10, with some requesting a stronger wording of the policy and that as part of promoting the 15-minute city, amenities, leisure and physical activity facilities should be encouraged. A submission from Dublin Town states that they do not support the 15-minute city concept as they consider that the city is too dispersed with insufficient population to support the diversity of services.

A number of submissions support the policy provisions in regard to neighbourhood development under Policy QHSN11, refer to the need for the preparation of local plans to provide frameworks for the ongoing development of sustainable neighbourhoods and request that community safety strategies are devised and implemented in the regeneration areas. Submissions also request that Policy QHSN11 includes the promotion of developments which achieve a diversity of tenure types and that neighbourhood development can be vulnerable to high rise construction.

A number of submissions request the insertion of a policy that the Council will work with the Dublin City Public Participation Network in communicating how local businesses, communities and individuals can work towards the achievement of the UN Sustainable Development Goals by 2030 and in supporting initiatives on education for sustainable development and propose that the City Council implement the Human Rights Based Approach model.

A number of submissions request amendments to Figure 5-1 'A City of Neighbourhoods', including the location of the key neighbourhoods of Glasnevin and Kimmage and submissions highlight the key neighbourhoods of the South Georgian Core and the North Georgian Core. A submission requests that the Earlsfort Terrace area be designated as a key neighbourhood and that additional key neighbourhoods be designated in the southwest inner core and northeast inner core to counterbalance mono-office development with related changes to land use zoning and neighbourhood objectives.

Chief Executive's Response

The CE notes the support for the policy provisions in regard to the 15-minute city concept and in regard to encouraging amenity facilities as part of the 15-minute city. It is considered that Policy QHSN10 adequately address this matter and provides for liveable, sustainable urban neighbourhoods that deliver housing and public spaces served by local amenities.

The CE notes the support for the policy provisions for neighbourhood development under Policy QHSN11. Policies SC12 and QHSN33 promote development of a greater diversity of housing type and tenure, and Chapter 2 Core Strategy, details the Local Area Plans and Village Improvement Plans that are operational and that are to be commenced over the Plan period. In terms of community safety strategies, these are addressed under Objective QHSNO12 which requires that all housing developments over 100 units shall include a community safety strategy. In regard to building height and neighbourhoods, policies SC16 and SC17 recognise the potential and need for increased height in the city provided that proposals ensure a balance between the reasonable protection of existing amenities and environmental sensitivities, protection of residential amenity and the established character of the area. In addition, Appendix 3 sets out detailed performance criteria for the assessment of higher buildings.

The UN Sustainable Development Goals are set out in Section 1.9.2 of the Draft Plan and are embedded in DCC's Corporate Plan 2020-2024. The goals and priority objectives of DCC's Corporate Plan 2020-2024 are linked to the UN Sustainable Development Goals and the issues raised in the submission are more appropriately addressed through the corporate plan.

The submissions in regard to Figure 5.1 'A City of Neighbourhoods' are noted. Figure 5-1 is an indicative map only of neighbourhoods in the city and Chapter 7 supports the consolidation and enhancement of the inner city and the creation of sustainable, mixed--use and vibrant neighbourhoods. Both Glasnevin and Kimmage villages are noted on the map. The Georgian cores are addressed comprehensively elsewhere in the Draft Plan including in Chapters 4 and 11.

Chief Executive's Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Section 5.5.4 Social Inclusion

Summary

Age Friendly Ireland recommend that Policy QHSN17 should be reworded to make specific reference to a minimum percentage of new developments which must incorporate Age Friendly and Universal Design Features to support the ageing population. A number of submissions state that there should be policy provided in the Draft Development Plan for investment in the

refurbishment and insulation of housing complexes for older people and that a policy should be provided that all new builds should be fit for residents to live in as they age.

A number of submissions support Policy QHSN18 which promotes a youth friendly city and refer to a lack of dedicated youth work space and facilities for young people to congregate in a safe manner, in particular in the Dublin 8 area and inner city.

A submission requests removal of the policy which does not favour gated communities and another submission requests that only in exceptional circumstances should gating be permitted in residential developments. The NCBI requests that they be consulted when housing and placemaking proposals are being developed. In regard to Objective QHSNO8, a submission requests that safety audits be undertaken in all local plans and a gender impact assessment is included as part of the development plan.

Chief Executive's Response

It is considered that reference to a minimum percentage of new developments which must incorporate Age Friendly and Universal Design Features to support the ageing population is addressed in the amendments to Objective QHSO10 in Section 5.5.5 as recommended further below. It is considered that Policy QHSN7 addresses the refurbishment and insulation of existing buildings, including the City Council's Estate Renewal Programme and that as identified in Section 3.5.2, that the government's Housing for All Plan will support the retrofit of 500,000 homes in Ireland by 2030 to a B2 Building Energy Rating (BER).

The CE notes the support for the policy provisions for a youth friendly city under Policy QHSN18 which promotes and supports the delivery of facilities for children and young people, to include the delivery of youth targeted social, community and recreational infrastructure.

It is recommended to retain Policy QHSN20 Gated Residential Development which supports the creation of a permeable, connected and well-linked city. Consultation on public realm proposals is an operational matter and outside the scope of the Development Plan. The promotion of safety and security in new housing developments and the public realm are addressed under policies QHSN11, CCUV40, Objective QHSNO12 and Section 15.4.5 of the Draft Plan.

Chief Executive's Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Section 5.5.5 Housing for All

Summary

The Irish Wheelchair Association (IWA) makes a number of recommendations including that the Development Plan includes promotion of IWA's Think Ahead, Think Housing campaign; that the Development Plan commits that all social housing projects supported by capital funding from the Department of Housing, Local Government and Heritage deliver 7% of integrated UD Home+ designed, fully wheelchair accessible social housing units; and recommends that the Development Plan promotes innovative housing design models for people with disabilities.

A submission highlights that Policy QHSN25 should be supplemented with additional stronger targets to reflect the stronger obligations and rights-based approach under UNCRPD. In relation to Policy QHSN22, a submission states that a needs analysis should be carried out for older people and local area plans would be an appropriate framework for assessing the needs of an aging population. One submission calls for the introduction of a 'retirement village' zoning and land-use definition.

Universal Design

A number of submissions request that the wording of Objective QHSNO10 be strengthened and higher targets provided. The submission from the National Disability Authority (NDA) requests that the 10% target in schemes over 100 units is amended to remove reference to 'schemes of over 100 units' and increase the percentage of Universal Design Homes, with a new target to be, at a minimum, in line with actions 4.4 and 4.6 of the Housing Options for Our Ageing Population Policy Statement. The NDA recommends that the 30% of all new dwellings being built to UD principles under Action 4.6 of the Housing Options for our Ageing Population Policy Statement should split into 20% UD Home and 10% UD Home+.

Age Friendly Ireland also recommend that Objective QHSNO10 should be enhanced to support greater accessibility in dwellings and to align more closely with the objectives of the Housing Options for our Ageing Population policy statement. They provide a suggested re-wording that 50% of apartments in any development that are required to be in excess of minimum sizes should be designed to be Age Friendly so that they are suitable for older people and particularly those who may be mobility impaired people and people with disabilities accordance with the standards set out in the Universal Design Guidelines for Homes in Ireland 2015. A number of other submissions request similar amendments to policy QHSNO10 to require that 50% of apartments in any development that are required to be in excess of minimum sizes, should be designed to be suitable for older people/mobility impaired people and people with disabilities in accordance with the standards set out in the Universal Design Guidelines for Homes in Ireland 2015 and that 25% are designed to UD Home+ and 25% are designed to UD Home++.

The Irish Wheelchair Association (IWA) recommends that the Development Plan includes reference to IWA's Think Housing Build Accessible campaign calls for 7% of all new developments, both in the private and public sector to be fully wheelchair accessible, meeting at a minimum, the UD Home+ standard of Universal Design. They state that where a person using a larger powerchair, or requiring assistance with their activities of daily living and/or personal care, the design of the house/home should be designed and constructed to the UD Home++ standard of Universal Design. The remaining 93% of houses should be designed and constructed to the UD/ lifetime adaptable homes standards.

A submission on behalf of adults attending the Central Remedial Clinic requests that Objective QHSNO10 include reference to wheelchair users.

A submission by the RIAI suggests that policies in Section 5.5.4 be strengthened by a requirement for the provision of a Universal Design Statement using a prescribed template for all planning applications. It is stated that in regard to Objective QHSNO10, that the percentage of apartments be reviewed for conflict/ alignment in the context of policy requirements set out in the Universal Design Guidelines for Homes in Ireland 2015 and that any development that is required to be in excess of minimum sizes should be designed to be suitable for older people/mobility impaired people and people with disabilities accordance with the standards. The RIAI also state that reference should be made to the recently published National Housing

Strategy for Disabled People 2022 – 2027 and that text in Section 5.5.5 in regard to the term ‘disability’ be replaced. They suggest that text in Section 5.5.5 in reference to Part M be removed and that Policy QHSN21 be amended to include reference to the Universal Design Guidelines for Homes in Ireland 2015. The RIAI also request that Policy QHSN23 be amended to support non-AHBs in the reconfiguration of family homes and amendment to Objective QHSNO9 to provide criteria for flexible home adaptations.

Homelessness

A submission requests that a policy should be added to adopt a housing first approach to preventing homelessness and working to meet objectives of the Government’s Housing First Implementation Plan 2022-2026 and to work towards the Government’s commitments to ending homelessness by 2030 provided in the Government’s Housing for All Plan.

A number of submissions refer to an overconcentration of homeless accommodation and services in the city centre, including in Dublin 1 and Dublin 8 and request that Development Plan policies are put in place to reduce its concentration and to engage with Dublin Regional Homeless Executive and HSE to redistribute homeless accommodation and services to areas of existing low concentration in the city, within the context of a 15-minute city. A submission in regard to Policy QHSN27, requests that the policy to be omitted due to the uncoordinated placement of services including homeless, emergency, hostel and family hub type accommodations, plus treatment services and transitional housing which it is considered have disrupted communities, economies and the built heritage fabric in the Dublin 1 area.

Submissions also request policies to ban homeless hostels for profit and to provide a commitment not to use private security companies in DCC funded homeless accommodation and to set targets for inspections of homeless services.

Traveller Accommodation

A number of submissions have been made requesting that reference be made in the Draft Plan to specific sites identified for Traveller accommodation to deliver the current Traveller Accommodation Programme and to provide detailed strategies on targets for new Traveller accommodation sites, adequate sanitation and facilities to existing sites. Another submission requests a more specific timeframe for the 200 accommodation units and recognition of horses in Traveller culture.

Domestic Violence Refuges and Emergency Accommodation

One submission seeks modifications to policies QHSN30 and QHSN31 to state that dependence on such accommodation should be minimised over the lifetime of the Development Plan in line with the objectives set out in the Government’s Housing First National Implementation Plan 2022-2026.

A submission requests revisions to policies QHSN26-31 to provide further detail on strategies to reduce reliance on emergency accommodation, to transition from use of private emergency accommodation and family hubs and to reduce the average time spent by families in emergency accommodation.

Chief Executive's Response

The Housing Strategy in Appendix 1 provides details on meeting the housing needs of older persons and policies and objectives in Chapters 5 and 7 seek to support the needs of an aging population in the community in regard to housing and the built environment. In regard to a 'retirement village' zoning, this matter is addressed under the CE response in Chapter 14.

Universal Design

The CE notes the issues raised in respect to Universal Design targets and having regard to the Universal Design Guidelines for Homes in Ireland 2015, the DHLG&H's Design Manual for Quality Housing 2022 and the DHPLG's Housing Options for Our Ageing Population, it is recommended that amendment of Objective QHSNO10 regarding Universal Design targets is appropriate for consistency and to support Dublin City Council's commitment to implement the framework for the delivery of housing for persons with disabilities set out under the 'National Housing Strategy for Disabled People 2022-2027'.

In terms of the requests in submissions for a percentage of all new developments to be designed to UD Home+ and UD Home++ standards, the Universal Design Guidelines for Homes in Ireland (2015) provides the tiered system for UD Homes to provide a flexible framework for designers to apply the guidelines creatively to all new home types through incremental steps and to provide guidance to raise awareness and assist in person-centred design. In this regard, it is considered that the Universal Design target and amended wording to Objective QHSNO10 provides flexibility in the design of dwellings designed to be suitable for older people/mobility impaired people and people with disabilities in accordance with the guidelines set out in the Universal Design Guidelines for Homes in Ireland 2015.

It is recommended to update and amend reference to the 'National Housing Strategy for Disabled People 2022-2027' and to update reference in Section 5.5.5 to the term 'disability' as provided in the updated strategy.

It is recommended that Policy QHSN21 Adaptable and Flexible Housing is amended to include reference to the Universal Design Guidelines for Homes in Ireland 2015.

Universal design is addressed comprehensively in Chapter 5 of the Draft Plan, particularly under Objective QHSNO10 and in terms of social inclusion under policies QHSN11, QHSN15 and QHSN21. Chapter 15 requires that information in regard to universal access is required as part of the Design Statement for applications of 30+ residential units. See Table 15-1, page 640 and Table 15-2, page 664.

Adaptable and flexible home adaptations are addressed under policies QHSN21, QHSN22, QHSN23 and Objective QHSNO9 and Appendix 18 provides detailed guidance and standards in relation to the subdivision of dwellings and ancillary family accommodation.

Policy QHSN25 states that it is policy of the City Council to support and facilitate the implementation of the City Council's Strategic Plan for Housing People with a Disability 2016 or any subsequent review and it is considered that the review of the Strategic Plan will reflect up to date policy requirements.

Traveller Accommodation

Please see summary, response and recommendations with regard to the issues raised by the OPR in Appendix 1 Housing Strategy of this Chief Executive's Report. The Traveller

Accommodation Programme 2019-2024, identifies the requirement to provide or assist in the provision of over 200 units across a full range of accommodation types over the period of the programme. The Council will continue to address the provision of accommodation appropriate to the particular needs of Travellers through the implementation of the programme.

Homelessness

The Draft Plan recognises that homelessness requires an inter-agency approach to provide housing options for those who need it and policy QHSN26 provides support for implementation of the Homelessness Action Plan Framework for Dublin 2019-2021 or any subsequent review. It is recommended that Policy QHSN26 is amended to include support for the Housing First National Implementation Plan 2022-2026.

The Draft Plan has both policy and development standards in place to ensure that all proposals to provide or extend temporary homeless accommodation or support services shall be supported by information demonstrating that the proposal would not result in an undue concentration of such uses nor undermine the existing local economy, resident community or regeneration of an area. The current location of homeless accommodation and services in the city and the setting of targets for inspection of homeless services are operational matters and outside the scope of the Development Plan to be addressed through the Housing and Community Services Department and the Dublin Region Homeless Executive.

Domestic Violence Refuges and Emergency Accommodation

No modifications are recommended to policies QHSN30 and QHSN31 as it is considered that Policy QHSN30 in regard to domestic violence refuges and Policy QHSN31 in regard to emergency accommodation are important to promote equality and progressively reduce all forms of social exclusion and facilitate the needs of all that can experience a sudden need for housing provision.

Chief Executive's Recommendation


Chapter 5

Section: 5.5.5 Housing for All

Page: 176

Amendment:

Policy QHSN21 Adaptable and Flexible Housing

It is the Policy of Dublin City Council: To ensure that all new housing is designed in a way that is adaptable and flexible to the changing needs of the homeowner as set out in the Lifetime Homes Guidance contained in Section 5.2 of the Department of the Environment, Heritage and Local Government's 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007)  [{and the Universal Design Guidelines for Homes in Ireland 2015.}](#)

Chapter 5

Section: 5.5.5 Housing for All

Page: 179

Amendment:

Policy QHSN26 Homeless{ness} Action Plan Framework for Dublin 2019-2021

It is the Policy of Dublin City Council: To support the implementation of the Homeless{ness} Action Plan Framework for Dublin 2019-2021 or any subsequent review {and the Housing First National Implementation Plan 2022-2026} and support related initiatives to address homelessness.

Chapter 5

Section: 5.5.5 Housing for All

Page: 177, 1st and 2nd paragraphs

Amendment:

Housing for People with Disabilities

Dublin City Council is committed to implementing the framework for the delivery of housing for persons with disabilities set out under the {‘National Housing Strategy for Disabled People 2022-2027’} ~~(National Housing Strategy for People with Disability (2011-2016 – extended to 2020).~~ In the strategy, the term ‘disability’ is used to refer to persons in one or more of the following categories ~~(of disability)~~: sensory disability, mental health {difficulties} ~~(disability)~~, physical disability and intellectual disability.

{The} ~~(A new national strategy)~~ National Housing Strategy for {Disabled People} ~~(Persons with Disabilities)~~ 2022-2027 {has been} ~~(is being)~~ developed with the objective of facilitating the provision of housing options and related services to people with disabilities, to allow individual choice and support independent living.

Chapter 5

Section: 5.5.5 Housing for All

Page: 178

Amendment:

Objective QHSNO10 Universal Design

~~(It is an Objective of Dublin City Council: To require that a minimum of 10% of dwellings in all schemes over 100 units are designed to accommodate people with disabilities and older people in accordance with the Universal Design Guidelines for Homes in Ireland 2015.)~~

{It is an Objective of Dublin City Council: To ensure that 50% of apartments in any development that are required to be in excess of minimum sizes should be designed to be suitable for older people/mobility impaired people and people with disabilities in accordance with the guidelines set out in the Universal Design Guidelines for Homes in Ireland 2015, the DHLG&H’s Design Manual for Quality Housing 2022 and the DHP&LG & DH’s Housing Options for Our Ageing Population Policy Statement 2019.}

Please see also the recommendations with regard to the issues raised by the OPR and the CE recommendations in relation to Appendix 1 Housing Strategy of this Chief Executive’s Report.

Section 5.5.6 Social, Affordable Purchase and Cost Rental Housing

Summary

The Land Development Agency (LDA) request that the Development Plan include an acknowledgement of the role of the LDA in the delivery of residential developments which will provide for schemes which are fully /predominantly affordable and social housing.

A number of submissions highlight that there is a lack of affordable housing across the city and request that policies QHSN32 and QHSN33 should be amended to include stronger commitments to public housing, a commitment to reduce reliance on the private market and to put in place a policy to ensure there is no further leasing of social housing units from the private sector. Submissions state that the Council needs to find a way to accelerate the delivery of housing targets and preference should be given to public schemes and AHB initiatives.

A number of submissions request that Policy QHSN33 should include for the Council to conduct a city-wide audit of housing to detail tenure type and typology and to add community land trusts to Policy QHSN33.

Chief Executive's Response

The Land Development Agency are recognised in Section 5.5.6 of the Draft Plan as a delivery partner, along with State agencies, Local Authorities, Approved Housing Bodies (AHBs) and other delivery partners which will work with the delivery office to achieve the implementation of the Government's 'Housing for All - a New Housing Plan for Ireland' (2021), including social homes and affordable homes for purchase or rent.

The CE notes that the significant importance of housing delivery is acknowledged throughout the plan with a suite of policies and objectives aimed at activating sites and facilitating the ongoing consolidation of the city to create long term sustainable housing and communities in the city. The Housing Strategy set out in Appendix 1, will be the key planning mechanism for the delivery of new affordable housing and sustainable communities.

The CE notes Section 8.1 of Appendix 1, Housing Strategy and Interim HNDK Key Policy Recommendations (Page 76) that details recommendations to inform the Draft Plan housing delivery approach including to:

- To facilitate the maximum allowable provision under the Planning Act (as amended) for affordable and social housing provision as part of future planning permissions.
- To require that 20 percent of land zoned for residential use, or for a mixture of residential and other uses for development of four or more units or development of units on land more than 0.1 hectares be reserved for the provision of, social, affordable purchase and cost rental housing.
- To provide for social, affordable purchase and cost rental housing accommodation through a range of delivery mechanisms including new builds, acquisitions, renovations and acquisitions of vacant homes, leasing, and housing supports or any other mechanism promoted or forthcoming under Government Housing Policy.

Chief Executive's Recommendation

No change is recommended as existing text in the Draft Plan responds to issues raised.

Section 5.5.7 Specific Housing Typologies

Summary

Housing and Apartment Mix

A number of submissions raise issues in regard to Policy QHSN36 stating that unit mix should be decided on case by case basis having regard to the demographics of the area; that HNDAs should be prepared for other areas of the city in addition to those carried out for the Liberties and the North Inner City; and that development management planning should consider whether developments will have an appropriate social sustainable mix of resident type to foster the stated goal of the creation of mixed use and sustainable residential communities. Further submissions request the deletion of the specific housing mix requirement for the Liberties and NEIC.

The OPR acknowledges that the Draft Plan has provided an evidential basis for the proposed residential mix requirements in the North Inner City and Liberties sub-city areas which satisfies the requirement in Specific Planning Policy Requirement (SPPR) 1 of the Sustainable Urban Housing: Design Standards for New Apartments (2020).

Build To Rent Accommodation

A large number of submissions were received regarding the Build to Rent sector. A number of submissions support Build to Rent schemes stating that they provide much needed housing for people, while a number oppose Build to Rent in the city stating that they are contrary to building sustainable neighbourhoods.

The OPR notes Policies QHSN38 and QHSN39 on Build to Rent accommodation (BTR) set out in the Draft Plan as a response to the Council's concern regarding the dominance and risk of over concentration of BTR schemes in the city and the creation of sustainable communities. Concerns are however, raised by the OPR and it is considered that these policies should be expressed in a more appropriate manner. Please see CE summary, response and recommendations with regards to the OPR submission for further detail.

A large number of submissions raise concerns regarding the Build to Rent policies contained in the Draft Plan stating that they will hinder the delivery of quality homes in Dublin city, are in conflict with SPPR 7 and 8 of the Sustainable Urban Housing: Design Standards for New Apartments' (2020) and seek the omission of and modifications to the wording of Policies QHSN38, QHSN39, QHSN40 and QHSN42.

The Land Development Agency (LDA) request consideration of the cost rental model in relation to the proposed policies regarding Build to Rent development given the longer-term nature of tenure and rental periods envisaged within the cost tenure model.

Policy QHSN38 Build To Rent Accommodation

Modifications sought by submissions to the wording of Policy QHSN38 relate to the locational criteria, the minimum of 40% build to sell requirement and the requirement for an assessment of other permitted BTR developments in the vicinity (3km) of the site.

In relation to the locational criteria specified in Policy QHSN38, a number of submissions state that the criteria are too restrictive which could impede BTR development, push workers further from where they work and request that greater flexibility is incorporated into the BTR policies, and any locational restrictions are removed.

Several submissions request that Policy QHSN38 should be modified to exclude the inner city (i.e. within the canal ring) as an appropriate location for BTR as more owner-occupied housing is needed in the city centre, no evidence is provided as to why BTR should be allowed only in the inner city or within 500 metres of high employment areas or transport hubs and a policy of mixed tenure should be implemented city-wide. A submission emphasises that the city centre should feature strict controls on BTR, including a presumption against all such proposals within areas of high concentration of non-owner occupation and that the advantages and incentives of BTR are not applicable to older buildings which places much of the existing historic city at a competitive disadvantage for available finance and investment.

Some submissions seek that the definition of the areas acceptable for BTR proposals should be extended beyond the inner-city areas to ensure a range of choice of housing in the market and avoid the proliferation of a single use within the inner-city areas. In this regard, a number of submissions request the removal of the terminology “within the canal ring” with reference to the inner city in Chapter 5 and for the definition in the glossary for the inner city to remain in reference to any policies within the Draft Development Plan.

Other submissions highlight that BTR should be kept within the canal areas of the city where significant transport and employment hubs are and that policy should be provided stating that BTR will not be acceptable in areas where there is less than 20% owner-occupier housing. Some submissions seek that the locational criteria should include central and / or accessible and intermediate urban locations and should be in line with the Sustainable Urban Housing: Design Standards for New Apartments’ (2020). A number of submissions request that BTR should be allowed proximate to all critical transport infrastructure and that a map is needed to clarify areas within 500m walking distance of high employment areas.

A large number of submissions request that the requirement for applications for BTR developments to be accompanied by an assessment of other permitted BTR developments in the vicinity (3km) of the site should be reduced or omitted from Policy QHSN38 as the 3km measurement is considered too large to enable the effects to be assessed at a neighbourhood level. A number of submissions request that the Draft Plan provides clarity on what would constitute over concentration of BTR development and that Policy QHSN38 be amended in that the Council or an independent assessor instead of the applicant should carry out the assessment of other permitted BTR developments in the vicinity of the site.

In relation to the requirement for a minimum of 40% of standard build to sell apartments in residential developments specified in Policy QHSN38, a number of submissions request the removal of this requirement to instead provide for a case-by-case assessment to ensure the delivery of mixed-tenure communities. It is stated that SPPR 8 of the Sustainable Urban Housing: Design Standards for New Apartments’ (2020) does not allow for any deviation from national policy in respect of the requirement for the specific unit mix requirement for Build to Rent development, and does not include a requirement for build to sell apartments to be provided within such schemes. Other submissions support the policy of requiring a minimum of 40% build-to-sell apartments and seek a modification to the policy that the 40% build to sell apartments cannot be sold off to institutional investors. One submission supports a more stringent limit of 70% build-to-sell apartments in all BTR developments. Several submissions

request that reference to build to sell apartments should be removed or clarified, as it is not defined in the Plan or planning legislation.

A number of submissions from developers and real estate investors request the removal of the requirement for 40% of standard build to sell apartments in residential developments specified in Policy QHSN38 which they consider to be overly prescriptive, commercially unviable and challenging or unworkable in terms of management and maintenance of two types of apartments on site. Several of these submissions state that this 40% requirement will significantly restrict or displace the delivery of high-density housing in the city, will disproportionately impact young people and immigrants and that no evidence base is provided for the restriction of BTR accommodation.

Policy QHSN39 Build to Rent Accommodation

A number of other submissions received request the omission or amendment of Policy QHSN39 which they consider would add to the difficult funding conditions for building at scale, will reduce housing delivery and should be amended so that smaller BTR schemes of less than 100 units be assessed on a case by case basis.

Several submissions state that Policy QHSN39 should be amended to be in line with SPPR 7 of the Sustainable Urban Housing: Design Standards for New Apartments' (2020) in regard to the provision of communal facilities and services and limits on the quantum of BTR units are not supported by national policy or guidelines. Submissions also state that an evidence base is not provided to support the proposed policy and request that clarity is provided as to what constitutes "exceptional circumstances." A number of submissions refer to the combined effect of the BTR requirements of a minimum of 40% of standard build to sell apartments in Policy QHSN38 and to discourage BTR schemes of less than 100 units would create viability issues and require BTR schemes to provide a minimum of 166 no. units.

Policy QHSN41 Shared Accommodation/Co-living

A number of submissions request that there should be no more shared accommodation/co-living in the city and a greater focus should be placed on affordable housing for families. A submission requests that the Draft Plan should acknowledge extant permissions for shared accommodation and that applications for alterations and/or extension be assessed on their merits on a case by case basis. Another submission states that there remains a clear demand for co-living units to support a broad and balanced housing market and the HNDA should be updated to properly assess co-living units and the contribution they could make towards meeting housing need over the Plan period.

Policy QHSN42 Build to Rent/Student Accommodation/Co-living Development

Several submissions request the omission of Policy QHSN42 which they consider duplicates elements of the Build to Rent and shared accommodation policies and is likely to push student accommodation away from suitable sites close to public transport and third level institutions. Concerns are raised regarding an over concentration of BTR, student accommodation and high support accommodation in the Dublin 8 area.

Policy QHSN43 Third-Level Student Accommodation

Several submissions oppose student accommodation development in the city and call for more affordable student accommodation in the city. The Grangegorman Development Agency

supports Policy QHSN43 regarding Third-Level Student Accommodation. Several submissions request that policy QHSN43 be amended to include that there will be a presumption against the change of use of Third Level Student Accommodation to short term lettings or tourist accommodation or to shared living schemes.

Chief Executive's Response

Housing and Apartment Mix

A detailed response to the issue of housing and apartment mix is set out under the CE response in Volume 2 Appendices Appendix 1 Housing Strategy Incorporating Interim Housing Need Demand Assessment.

Build To Rent Accommodation: Policies QHSN38 and QHSN39

A detailed response to the issue of Build To Rent accommodation is set out in the CE response to the OPR submission. Please refer to same for further detail.

As set out in the Sustainable Urban Housing: Design Standards for New Apartments (2020), Build to Rent accommodation is more suitable for central locations and/or proximity to public transport services and in this context, the specific locations within the inner city, within 500 metre walking distance of a high employment area and major public transport interchanges and within SDRAs are considered appropriate. As set out in the CE response to the OPR submission, in the interests of clarity, it is recommended that reference to “within the canal ring” is removed from Policy QHSN38 and Section 15.10 of the Draft Plan as the inner city is defined in Chapter 17 Glossary of the Draft Plan.

The CE recommends that the 3km distance for assessing the matter of overconcentration is inappropriate and should be reduced to 1km. A 3km distance is considered excessive and will be counterproductive in identifying where pockets of overconcentration actually occur. If a wider geographical area is analysed, the level of concentration of a particular development will be less. Therefore, it could be concluded that in this wider area a greater level of development could be acceptable which would be contrary to the intent of the policy to prevent over concentration.

Policy QHSN41 Shared Accommodation/Co-living

A detailed response to the issue of shared accommodation/co-living is set out under the CE response in Volume 2 Appendices Appendix 1 Housing Strategy Incorporating Interim Housing Need Demand Assessment. As per SPPR 9 of ‘Sustainable Urban Housing: Design Standards for New Apartments’, 2020, the HNDA analysis of the Draft Plan does not indicate a specific demand for shared accommodation in Dublin City and, therefore, there will be a general presumption against granting planning permission for this form of development.

Policy QHSN42 Build to Rent/Student Accommodation/Co-living Development

It is recommended to retain Policy QHSN42 which seeks to avoid the proliferation and concentration of clusters of build to rent/student accommodation/co-living development in any area of the city.

Policy QHSN43 Third-Level Student Accommodation

Circular Letter PL8/2016 issued in July 2016 by the Department of Housing, Planning, Community and Local Government to planning authorities, regarding matters to consider in relation to the handling of planning applications for student accommodation makes it clear that housing for students is a specific and important segment of the overall housing sector with distinct characteristics and requirements and accordingly, appropriate safeguards are required to ensure that student accommodation is not used as permanent residential accommodation or for other uses and is restricted to the accommodation of students during the academic year. The Circular requires that planning authorities should aim to avoid making permissions for student accommodation complexes subject to restrictions on alternative summer or holiday uses and ensuring that student accommodation is capable of being used for legitimate occupation by other persons/groups during holiday periods, when not required for student accommodation purposes.

Chief Executive's Recommendation

Please see the recommendations with regard to the issues raised by the OPR and the CE recommendations in relation to Appendix 1 Housing Strategy of this Chief Executive's Report.

Section 5.5.8 Social and Community Infrastructure

Summary

A submission from the Department of Education raises a number of issues including that Chapter 5 should reference the importance of protecting existing school sites and should state that school places may be provided through either one or a combination of utilising existing unused capacity within a school or schools, extending the capacity of an existing school or schools and provision of a new school(s). The Department also requests support for urban design schools as per their guidelines in established areas, in particular, measures to facilitate reduced requirements for on-site parking and to support access to off-site public amenities and facilities.

Submissions from a number of school trust bodies request that QHSN51 be amended to refer to the likelihood of school rationalisation during the Plan period and that schools should be able to decide whether surplus lands are available. Acknowledgement is sought in the Draft Plan that the disposal of land by a school body is clear evidence that it is surplus to local educational needs.

A number of submissions call for the monitoring of established areas of the city where demographics have changed and to undertake an analysis of the demographics of new developments following the release of Census 2022, to establish the level of childcare needed in residential developments in Dublin City. Several submissions request that in the assessment of the need for childcare, the capacity of other childcare facilities needs to be assessed and that the granting of planning permission for a large-scale residential development (LSRD) would be contingent on not less than 15% of the floor space of such a development being used for the provision of childcare. A submission emphasises that a flexible approach to pre and after school childcare, and other family supports, should be encouraged as people adapt to a hybrid model of commuting to the workplace and in the development of sustainable neighbourhoods.

Several submissions refer to a deficit in social infrastructure in areas of the city, including Santry and Dublin 8 and that there is a need for further community spaces and facilities. A submission

requests that an audit of areas in the city is carried out to ensure corresponding community and cultural services with significant residential development. A submission is also made seeking an objective to protect and retain the Corpus Christi Parochial Hall as an important and necessary community amenity in Drumcondra.

A submission states that drug and alcohol addiction services should be included in the cultivation of sustainable neighbourhoods, its inclusion in the Draft Plan is essential to the cultivation of a coherent rehabilitation system of services in the city, that the actions and strategies of the HSE's Sláintecare Plan 2021-2023 should be included in the Draft Plan and that the inclusion of safe needle exchanges and supervised injection centres in the Draft Plan would ensure more considered zoning of the services.

Chief Executive's Response

A detailed response to the issue of school sites is set out in the CE response to the OPR submission. Please refer to same for further detail. The CE acknowledges the strategic importance of schools and educational facilities as essential community and social infrastructure. The preservation of existing educational sites for ongoing use, consolidation and development is essential to ensure adequate facilities to serve the future needs of the city and is supported by the Department of Education.

Regarding submissions requesting that Policy QHSN51 be amended to refer to the likelihood of school rationalisation during the Plan period, the submission from the Department of Education is noted which emphasises that protecting existing educational sites, including buildings, play areas, pitches and green areas, is critical to optimally meet the future educational requirements of local areas across the city, in particular given the strategic principle of the Draft Plan of creating a more compact city aligned with the principle of the 15-minute city.

Sections 5.5.8 and 15.8.3 (page 682) of the Draft Plan seek to encourage innovative school design which provides for the efficient use of urban lands and states that the efficient use of lands will be encouraged through the development of new urban typologies of school building design which should have regard to the requirements set out by the DES Schools' Design Guidelines.

The Draft Dublin City Development Plan 2022-2028 identifies that the provision of good quality and fit-for-purpose neighbourhood-based and local childcare services are central to providing for sustainable communities. Policies QHSN46, QHSN53 and Section 15.8.4 of the Draft Development Plan require that all residential applications comprising of 50 or more units shall include a community and social audit to assess the provision of community facilities and infrastructure, including childcare, within the vicinity of the site and to identify whether there is a need to provide additional facilities to cater for the proposed development. This includes that an analysis of demographic and geographic need is undertaken by the applicant in consultation with the Dublin City Council Childcare Committee, in order to ensure that the provision of appropriately designed and sized fit-for-purpose affordable childcare facilities is in keeping with areas of population and employment growth. In regard to protecting and retaining the Corpus Christi Parochial Hall as a community amenity, this matter is addressed under the CE response in the Zoning Maps chapter.

The provision of social support services is addressed in Section 15.13.9 and Policy QHSN27 of the Draft Plan. Section 15.13.9 states that an over-concentration of non-tourist hostel accommodation, homeless accommodation, social support institutions and family hubs can potentially undermine the sustainability of a neighbourhood and so there must be an appropriate

balance in the further provision of such developments and/or expansion of such existing uses in electoral wards which already accommodate a disproportionate quantum. Accordingly, there shall be an onus on all applicants to indicate that any proposal such development will not result in an undue concentration of such uses, nor undermine the existing local economy, the resident community, the residential amenity, or the regeneration of the area. Policy QHSN50 states that it is the policy of the Council to support the Health Service Executive and other statutory, voluntary and private agencies in the provision of appropriate healthcare facilities - including the system of hospital care and the provision of community-based primary care facilities, mental health and wellbeing facilities including Men's Sheds - and to encourage the integration of healthcare facilities in accessible locations within new and existing communities in accordance with the government Sláintecare Plan. Buildings for the health, safety and welfare of the public and community facilities are permissible/open for consideration under the majority of zonings of the Draft Plan. It is recommended that Section 5.5.8 of the Draft Plan is amended to refer to the updated Sláintecare Plan 2021-2023.

Chief Executive's Recommendation

Please see the recommendations with regard to the issues raised by the OPR of this Chief Executive's Report.

Chapter 5

Section 5.5.8 Social and Community Infrastructure

Page: 192

Amendment:

The government's (2018) Sláintecare Plan (~~encourages the development and resourcing of 'community healthcare' which it identifies as the future direction of health and social care services in Ireland.~~){2021-2023 prioritises two reform programmes for implementation including improving safe, timely access to care, promoting health and well-being and addressing health inequalities.}

Chapter 6: City Economy and Enterprise

Chapter 6: City Economy and Enterprise

Submission Number(s):

0003, 0594, 0939, 0971, 1011, 1017, 1037, 1038, 1045, 1083, 1137, 1170, 1190, 1191, 1194, 1201, 1238, 1298, 1307, 1310, 1386, 1406, 1438, 1448, 1482, 1541, 1553, 1557, 1568, 1576, 1579, 1633, 1645, 1666, 1682, 1698, 1700, 1704, 1729, 1732, 1733, 1750, 1754, 1755, 1762, 1765, 1768, 1784, 1803, 1809, 1826, 1834, 1843, 1851, 1859, 1865, 1876, 1884, 1947, 1971, 2072, 2087, 2103, 2105, 2111, 2121, 2133, 2139

Section 6.5.6 Key Economic Sectors

Summary

Data Centres

A number of submissions make reference to the energy usage of Data Centres and seek requirements for Data Centres to demonstrate ways to reduce or negate reliance on fossil fuels and to redistribute energy. While recognising Data Centres play a significant and important role in managing and processing data, a submission states that a policy to facilitate Data Centres cannot be considered without an assessment of how their energy needs can be met. One submission states that the Draft Plan needs to provide more guidance on spatially suitable locations for larger energy generation and demand centres (i.e. Data Centres) to ensure efficient use of the existing transmission network and to ensure that the network provider can plan for future energy needs and the development of the electricity transmission grid.

Chief Executive's Response

The CE notes the concerns raised with respect to the potential energy usage of Data Centres. This is substantively addressed by Policy CEE25 (pg. 229) and at Section 15.14.14 (pg. 735). However, it is proposed to further strengthen the Plan text and Policy CEE25 as set out in the CE's recommendation below in response to the issues raised. Locational clarification is already provided in Chapter 14 land use zoning whereby such uses are permitted in principle in the Z7 Employment (Heavy Industry) zoning.

Chief Executive's Recommendation

Chapter 6

Section: 6.5.6 Key Economic Sectors, Data Centres

Page: 228, Fourth and Fifth Paragraphs

Amendment:

The accelerating digitisation of our society has created an increased international demand for additional data storage and processing infrastructure resulting in the development of large data centres in Ireland. **{As is stated in the 2021 National Climate Action Plan, the forecast growth of data centres clearly represents a challenge to Ireland's emissions targets.}**

In 2017, the Government published a statement on the role of Data Centres in Ireland's Enterprise Strategy. This document emphasised a plan led approach to promoting regional options for data centre investment. **{According to the 2021 National Climate Action Plan, this document is to be reviewed to ensure alignment with: sectoral emissions ceilings and our**

renewable energy targets; ongoing security of supply concerns; and the demand flexibility measures that are now needed.}

Chapter 6

Section 6.5.6 Key Economic Sectors, Data Centres

Page 229. Policy CEE25

Amendment:

Policy CEE25 Data Centres

To require applications for new data centre development to clearly demonstrate how the proposed development:

- {complies with any update of national policy and regulatory measures to manage demand from large energy users, such as data centres, in the context of climate targets and future network needs;}
- achieves high levels of energy efficiency;
- maximises the use on-site renewable energy;
- captures and reuses waste heat; and
- is signed-up to the Climate Neutral Data Centre Pact.

Chapter 15

Section: 15.14.14 Data Centres

Page: 735-736, 3rd paragraph:

Amendment:

The following points shall be considered in accessing applications for data centres:

- {Compliance with any update of national policy and regulatory measures to manage demand from large energy users, such as data centres, in the context of climate targets and future network needs.}
- Provide evidence to sign-up to the Climate Neutral Data Centre Pact.

Tourism, Hotels and Events

Summary

A submission made by Fáilte Ireland states that Dublin accounts for just over half of all overseas visitors to Ireland. Tourism pre pandemic revenue was almost €2.6bn in 2019 with over 80% of this coming from international tourists. Tourism is stated to be important in terms of employment, with the industry supporting approximately 65,000 jobs in 2019. Fáilte Ireland recommends a number of additions to enhance the policy coverage in the Draft Development Plan in order to ensure that a meaningful framework is established for the enhancement of tourism in the City.

A number of submissions reference an over-dominance of hotel and tourist accommodation in the city and seek restriction on any future development to avoid an overconcentration of the use in the city to the detriment of other social, cultural and residential uses and to encourage a better mix of development.

Other submissions seek to highlight that visitor accommodation / hotels provide an important economic function in the city and also provide other social and leisure functions, etc. The

removal of requirements to carry out overconcentration assessments as part of planning applications is requested.

Objections are raised regarding the proposal at objective CEE01 for Dublin City Council to carry out an analysis of the supply and demand for tourism related accommodation including hotels, aparthotels and hostels in the Dublin City area to inform the consideration of future development. It is considered that this may impact future planning applications and have the potential to introduce a moratorium on hotel development.

Chief Executive's Response

The CE notes the importance of the tourism industry to the economy of the city and to the provision of employment. However, in all instances it is essential to ensure that any growth or innovation in the city's tourist infrastructure provides the right balance between the needs of local communities, businesses and visitors.

The sustained growth in international travel and tourism globally over the last number of decades has resulted in significant growth in the hotel sector in cities across the world. This pattern has been particularly pronounced in open, internationally well-connected economies such as Ireland, and our nearest neighbours, the United Kingdom.

As part of the review of the Draft Plan, research was carried out into the approach to tourism accommodation and hotels taken in the currently adopted local development plans of a number of major UK cities including London, Glasgow and Edinburgh. The review found that while each city took a slightly different approach, all three cities sought to promote the development of suitable levels of tourism accommodation while also minimising the potential negative impacts of such development via qualitative development standards. Each of the three approaches also highlighted the need to either carry out a detailed quantitative study of tourism provision in the city area, or to ensure that such data was collected on an ongoing basis.

The comments regarding a hotel study are noted and the CE recommends a clarification to the Draft Plan that this study will be undertaken by Dublin City Council. The CE considers that the Draft Plan supports an evidence-based approach to the provision of tourist and visitor accommodation and textual amendments are recommended to provide refinement on foot of the issues raised. The objective to prepare an analysis of the supply and demand for tourism related accommodation will not in the view of the CE preclude applications for hotel developments. Such applications will be considered on their merits and in accordance with the criteria set out under policy CEE28. With respect to concerns raised regarding over concentration, the CE considers that this matter is adequately addressed through policy CEE28 and in section 15.14.1.

The CE notes the request by Fáilte Ireland and whilst in the interests of brevity a detailed description of all tourism initiatives is not considered necessary, it is recommended that some text updates are appropriate.

Chief Executive's Recommendation

Chapter 6

Section: 6.5.6 Key Economic Sectors, Tourism, Hotels and Events

Page: 231, Policy CEE27

Amendment:

Policy CEE27 Tourism Initiatives

To work with Fáilte Ireland and other stakeholders to deliver on significant tourism development initiatives for the city including:

~~(‘Smart Tourism’, the Dublin Coastal Trail and the Docklands Visitor Experience Development (VEDP) Plan.)~~

- {Dublin Regional Tourism Strategy 2022-2026
- Destination & Experience Development Plans
- Outdoor Dining Enhancement Scheme
- Urban Animation Scheme
- The Dublin Coastal Trail
- Smart Tourism & Digital Capability}

Chapter 6

Section: 6.5.6 Key Economic Sectors, Tourism, Hotels and Events

Page: 231, Policy CEE28

Amendment:

Policy CEE28 ~~(Tourism)~~ {Visitor} Accommodation

To consider applications for additional hotel, tourist hostel and aparthotel development having regard to:

- the existing character of the area in which the development is proposed including local amenities and facilities;
- the existing and proposed mix of uses (including existing levels of ~~(Tourism)~~ {visitor} accommodation i.e. existing and permitted hotel, aparthotel and student accommodation uses) in the vicinity of any proposed development;
- {the existing and proposed type of existing visitor accommodation i.e. Hotel Classification/Rating, Hostel Accommodation, Family Accommodation, Alternative Accommodation etc., in the vicinity of any proposed development;}
- the impact of additional ~~(Tourism)~~ {visitor} accommodation on the wider objective to provide a rich and vibrant range of uses in the city centre {including residential, social, cultural and economic functions;}
- the need to prevent an unacceptable intensification of activity, particularly in predominantly residential areas;
- the opportunity presented to provide high quality, designed for purpose spaces that can {generate activity at street level and} accommodate evening and night-time activities – see also Chapter 12, Objective CUO34.

Chapter 15

Section: 15.14.1 Hotels and Aparthotels

Page: 724

Amendment:

To {ensure a} ~~(counter)~~ balance {is achieved between the requirement to provide for adequate levels of visitor accommodation and other uses in the city such as residential, social, cultural and economic uses}, there will be a general presumption {against} ~~(to-avoid)~~ an overconcentration of hotels and aparthotels{.}

Pending the outcome of ~~(a hotel study)~~ {an analysis of the supply and demand for tourism related accommodation in the Dublin City area (to be carried out by Dublin City Council),} hotels and aparthotels will be considered on a case by case basis having regard to the location of the site and existing hotel provision in the area.

In ~~(certain)~~ {all} instances, where the planning authority deems there to be an overconcentration of such facilities in an area, the applicant will be requested to submit a report indicating all existing and proposed hotel and aparthotel developments within a 1km catchment providing a justification that the development will not undermine the principles of achieving a balanced pattern of development in the area, and demonstrating that the proposed development fully complies with the criteria set out in Policy CEE28 and in Section 15.14.1.1 and 15.14.1.2 below.

Section: 6.5.6 Key Economic Sectors - Transportation, Logistics and Dublin Port

Summary

Some submissions call for the role of Dublin Port to be re-examined and that port lands should be utilised for housing. A submission by Dublin Port Company welcomes the provisions of the Draft Plan regarding Dublin Port and the recognition of its economic importance to the city. This submission requests a number of text amendments to Draft Plan to reflect and support the Dublin Port Masterplan 2040. Dublin Port Company's submission highlights that Dublin Port is designated as a Tier 1 Port of National Significance by the National Ports Policy 2013 and is supported under the National Planning Framework (NPF).

Chief Executive's Response

Given the strategic importance of Dublin Port to the city and region, it is the view of the CE that it is fully appropriate for the City Council to continue to support the operations of the port in accordance with the Dublin Port Company Masterplan 2040, as set out under Policy CEE35 in Chapter 6. It is considered that it is appropriate to update policy CEE35 and related text to correctly refer to the Dublin Port Masterplan 2040 and to support Dublin Port as a key economic driver in line with the National Planning Framework, the EMRA Regional Spatial & Economic Strategy and the Dublin Metropolitan Area Plan (MASP).

Chief Executive's Recommendation

Amendment:

Chapter 6

Section: 6.4 Strategic Approach

Page: 213, first bullet point

- safeguard and enhance Dublin's role as Ireland's internationally competitive capital {and global gateway to the region and state};

Chapter 6

Section: 6.5.6 Key Economic Sectors, subsection Transportation, Logistics and Dublin Port

Page: 235

Policy CEE35 Dublin Port

To recognise that Dublin Port is a key economic resource and to have regard to the policies and objectives of the Dublin Port Masterplan {2040} including reintegration of the Port with the City.

Chapter 7: The City Centre, Urban Villages and Retail

Chapter 7: The City Centre, Urban Villages and Retail

Submission Number(s):

0339, 0340, 0590, 0594, 0739, 0740, 0759, 0853, 0887, 0909, 0933, 0939, 0949, 0982, 1011, 1030, 1037, 1038, 1048, 1068, 1083, 1115, 1137, 1187, 1191, 1194, 1197, 1201, 1238, 1249, 1264, 1298, 1307, 1310, 1353, 1358, 1386, 1406, 1438, 1465, 1480, 1515, 1523, 1553, 1555, 1566, 1568, 1578, 1579, 1593, 1604, 1618, 1620, 1621, 1630, 1633, 1643, 1666, 1676, 1680, 1698, 1704, 1729, 1733, 1741, 1743, 1755, 1764, 1784, 1791, 1799, 1809, 1813, 1826, 1829, 1843, 1849, 1866, 1875, 1882, 1884, 1892, 1948, 1959, 1971, 1972, 2072, 2085, 2086, 2087, 2119, 2120, 2121, 2125, 2129, 2133, 2139, 2144

Section 7.3 Challenges

Summary

A submission seeks that reference be made to the role local arts, cultural goods and services contribute to the vibrancy of Key Urban Villages.

A submission received seeks reference to the need to ensure full access as possible to all areas for those who are excluded from the concept of Active Travel.

Chief Executive's Response

The Chief Executive agrees that the Development Plan should reference the role that local arts and cultural goods and services contribute to the vibrancy of Key Urban Villages.

The Active Travel concept seeks to encourage sustainable, safe, convenient, universal accessibility for everyone, including older people and people with limited mobility. It is considered that the paragraph entitled Retrofitting the Public Realm to Realise Opportunities for Healthy Placemaking under Section 7.3 adequately reflects this.

Chief Executive's Recommendation

Chapter 7

Section: 7.3 Challenges, Investment in Key Urban Villages

Page: 244

Amendment:

An opportunity presents itself to facilitate the incubation of indigenous craft, **arts and cultural goods and services**, food production, local farmers markets and the sale of local produce and other local services that can contribute to the vibrancy and occupancy of the key urban villages' retail core.

Section 7.5.1 General Retail Policy and Sections 5.0 & 9.1 of The Retail Strategy (Appendix 2)

Summary

A number of submissions comment on the Draft Plan's retail hierarchy for the city (Policy CCUV2 Retail Hierarchy, Page 249 and Section 5 of The Retail Strategy, Appendix 2). Some

oppose the identification of the Omni Shopping Centre in Santry as a Key Urban Village and consider that its designation is not appropriate given the infrastructure capacity constraints of the centre and that its designation as a KUV has been influenced by SHD developments. Submissions seek its omission or that all of Santry Village be identified as a KUV. Other submissions seek that Phibsborough should be considered as part of the City Centre Retail Core.

Submissions received seek that Dorset Street and environs / Bolton Street / Artane / Stoneybatter / Drumcondra / Glasnevin / Terenure should be identified as Key Urban Villages in the Development Plan under Figure 7.1 of Chapter 7 and Table 2 of Appendix 2 Retail Strategy. While a submission recognises that the identification of KUV (District Centres) takes place at the regional level, it is submitted that KUV's do not have to be identical to that set out in the Regional Spatial and Economic Strategy (RSES). Dublin Town has submitted that it does not support out of town retail.

Chief Executive's Response

The Regional Spatial and Economic Strategy, 2019 (RSES) sets out the retail hierarchy for urban centres in the Eastern and Midlands Region - see Table 6.1 Retail Hierarchy for the Region in that document. Dublin City's retail hierarchy must accord with the RSES. The Draft Development Plan reflects the retail hierarchy of the RSES and sets out a retail hierarchy for the city at Table 2, page 182, Section 5 of the Retail Strategy, Appendix 2 which accords with the RSES. Santry/Omni is designated as a key District Centre/KUV already in the existing 2016 Development Plan.

In respect of out of town retail, the Retail Strategy for the Draft Development Plan seeks to support and promote city centre and urban village vitality through the sequential approach to retail development – see Policy CCUV3 Sequential Approach and Section 9.1 of the Retail Strategy, Page 203. In accordance with the Retail Planning Guidelines, 2012 (National Guidelines), where retail development is proposed at an out of centre site, only in exceptional circumstances where it can be demonstrated to the satisfaction of the Planning Authority that there are no sites within/on the edge of the urban centre, can an out of centre site be considered. Phibsborough is a distinct retail area, and not part of the City Centre retail core. It is considered that the Retail Strategy adequately deals with the issue of out of town retail.

Chief Executive's Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Section 7.5.1 General Retail Policy and The Retail Strategy (Appendix 2)

Summary

Policy CCUV11 - Omni Channel Retail is widely supported. The inclusion of Objective CCUV10 (Shopfront Improvement Scheme, Page 258) and Policy CCUV12 (Shopfront Design) in the Draft City Development Plan is welcomed and submissions state that the Shopfront Improvement Scheme should extend to the whole city and that this attention to design should extend to the whole building façade. Submissions indicate that there is a need for a review of shopfront signage / an audit of existing shopfronts.

Submissions seek a more proactive approach to vacant units in the city. A Use-It-Or-Lose-It law is suggested. Submissions outline that enabling the creative and voluntary sectors to occupy vacant property would help to address vacancy.

Submissions indicate that Chain Operators should be discouraged and that the Plan should promote independent / diverse / Dublin based retailers and space for artists to sell art / flea markets etc.

A submission seeks the protection of pub, retail, and historical establishments from being developed into hotels and apartments, such as the Globe Bar etc. One submission seeks that adult stores should be reduced / concentration avoided.

Submissions received seek that Objective CCUV03 (Monitoring / Review of Retail Floorspace Provision) which currently relates to the city centre and Key Urban Villages, should be extended to include urban villages and neighbourhood centres.

Chief Executive's Response

The roll out of the Council's Shopfront Improvement Scheme is subject to funding availability. It is a Council's objective to roll this initiative out city wide in the longer term as currently reflected in Objective CCUVO10 (Shopfront Improvement Scheme, Page 258). It is, therefore, considered that Objective CCUVO10 adequately reflects this objective and does not need to be amended.

Shopfronts form an important part of a street's character as they constitute a highly visible part of the building at the street level. On this basis, the following design guidelines were prepared and are used by Dublin City Council to promote and facilitate the principles of good shopfront design in Dublin City:

- The City Council's Shopfront Design Guide, 2001,
- Shop Front Design Guidelines - The O'Connell Street Area 2003

The Draft Development Plan's mixed-use approach in urban centres provides opportunities for active uses to occupy former retail space. To prevent / overcome high levels of vacancy in urban centres, Policy CCUV13 Vacant Units, seeks to support the temporary use of vacant commercial property with uses that can contribute to the economic, social and cultural vitality of the centres and which allow public access. This policy, therefore, supports active voluntary / creative uses in vacant units pending permanent occupancy.

Similarly Objective CUO25, page 448, in Chapter 12 Culture seeks to encourage the uptake of vacant space for artistic and cultural purposes in the short and longer term. It is considered that Policy CCUV13 and Objective CUO25 sufficiently address the issues raised.

The Retail Strategy for the city supports all forms of retail development. To support the retail sector and to ensure city / town centre vitality, the Draft Plan contains new policies to promote and facilitate variety in the city's shopping offer. These include Policies CCUV7 Variety in Shopping Offer; CCUV9 Independent Retailing; CCUV10 Specialist Shops etc.

The Draft Development Plan seeks to acknowledge and where possible protect those commercial establishments in the city (retail/pubs and historic establishments) which contribute to the character and attractiveness of the city. Policy CCUV10 Specialist Shops particularly seeks to acknowledge the role of specialist shops / independent / indigenous retail in the city centre and inner city which contribute to the character and attractiveness of the city centre.

Policy CU13 in Chapter 12 Culture seeks to protect Cultural Uses / Spaces in the city. Objective CUO36 in Chapter 12 Culture, seeks to protect Victorian and Edwardian Public Houses.

It is considered that Policy CCUV14 Adult Shops, Betting Shops and Gaming Arcades, deals sufficiently with the issue of preventing an excessive concentration of such uses including adult shops.

Objective CCUVO3 (Monitoring / Review of Retail Floorspace Provision) extends to the city centre and Key Urban Villages as these centres represent the highest tier of urban centre in the city with the greatest concentration of retail floorspace. It should be noted that as part of the preparation of a new retail strategy for the Region (Eastern and Midlands), retail floorspace for the whole city will be reviewed.

Chief Executive's Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Section 7.5.2 Primacy of the City Centre and Retail Core Area & Section 8.0 of the Retail Strategy (Appendix 2)

Summary

A submission states that the 15-minute city needs to be the underpinning principle for all city centre development supported by sustainable transport modes and an appropriate population base.

In this vein, and to ensure the city centre's vitality and viability, a number of submissions refer to the need for proposals to diversity the city centre's offer, providing mixed use streets / re-intensify existing business locations and ensuring commercial uses at ground floor level and generally supporting the experience economy.

Similarly, many submissions seek and support increased residential use in the city centre. It is submitted that the city centre needs to be repopulated and that a proactive approach to vacancy and to providing homes (not short term lets) including residential over commercial units needs to be encouraged / incentivised (success of the City Recovery Task Force given as an example). In this respect, the Living City Initiative is particularly supported. Some submissions seek an amendment to Policy CCUV18 Residential Development page 253 to allow the use of upper floors for residential use on Category 2 Shopping Streets.

Submissions seek a balance between residential, retail and other commercial uses. One submission outlines that framing the city centre as a retail and leisure core is at odds with the principles of the 15-minute model in that it will result in mono-cultured areas as is happening in the case of the Docklands. Other submissions outline concerns at the amount of city centre sites that have been redeveloped for hotels, student housing, short-stay lettings, co-living housing and offices. One submission states that the Retail Strategy lacks detail on hospitality issues.

Submissions are broadly supportive of the Category 1 and Category 2 designation as they pertain to the principal shopping streets in the Retail Core of the city centre (Policy CCUV16 and Section 8.12 of the Retail Strategy, Appendix 2, page 199). Some submissions welcome the changes to Category 1 and 2 designations under the Draft Plan. Other submissions consider

that the Category 1 and 2 Street designations are now obsolete and / or that to provide for a more vibrant retail core, the permitted uses on Category 1 Streets should be expanded to include food and beverage, tourism and leisure uses as per the Bannon Report (Function of Retail in the City Centre Review of the Dublin City Council Development Plan 2022).

One submission highlights that the Royal Hibernian Way is no longer a Category 2 street and it seeks that Duke Lane should also cease to be a Category 2 street.

A number of submissions were received in respect of Policy CCUV19 Parking and the Retail Core and Objective CCUVO6 Car Parks and Last Mile Delivery.

Many submissions received support Policy CCUV19 Parking and the Retail Core as it will enable the prioritisation of pedestrian movement in the retail core. One submission states the policy does not go far enough – that there should not be an objective to safeguard parking and people should be walking or cycling. Submissions query the policy's reference to 'the periphery' and why residential areas on the periphery of the retail core being targeted for car parking when they already suffer disproportionately from pollution, congestion and other problems caused by cars. Other submissions state that there is too much emphasis on making the city centre car free without consideration of shoppers needs to transport goods and that the policy is contrary to the 15-minute city concept.

Submissions generally support the concept of last mile delivery (Objective CCUVO6 Car Parks and Last Mile Delivery Page 254) with one submission saying this should relate to out of hours / overnight delivery only.

Submissions are supportive of the objective to reactivate the underutilised and inactive city centre streets and lanes - Objective CCUVO5 (Underutilised and Inactive City Centre Streets, Page 254 and Section 8.4 of the Retail Strategy, Appendix 2, Page 196) as this will bring new life to the city centre. A submission notes that there is a network of lanes and alleys around the city which should be mapped and improved and used as corridors for walking etc. Submissions point out the importance of street lighting, street improvements / resurfacing, universal access and the need to discourage laneway dumping / waste storage.

A submission supports the Special Planning Control Schemes for Grafton Street and O'Connell Street (Objective CCUVO8 and Section 8.14 of the Retail Strategy, Appendix 2). Other submissions point out that O'Connell Street needs upgrading / improvements while Grafton Street needs a revamp and tighter planning laws.

Chief Executive's Response

The Chief Executive agrees that the 15-minute city must underpin future city centre development and that diversifying the city centre / supporting residential development and enabling city centre sustainable travel modes is key to achieving this.

In this regard, Section 8.0 of the Retail Strategy, Appendix 2 of the Draft Plan sets out measures for the continuing revitalisation of the city centre, supported by policies / objectives in Chapter 7 The City Centre, Urban Villages and Retail. Section 8.0 of the Retail Strategy recognises and elaborates on those wide ranging and crossing cutting measures required to support the city centre namely, 'creating a welcoming and inclusive public realm', 'diversifying the city centre offer', 'supporting cultural vibrancy in the city', 'reactivation of underutilised and inactive city centre street and lanes', 'creating character areas / quarters', 'supporting outdoor dining', 'promoting independent / specialist retailing', supporting residential use in the city centre', 'providing for mixed use development' including in the retail core and 'supporting active travel

modes and sustainable movement' amongst others. The strategy for the city centre is in turn supported by city centre focused transportation and residential policies and objectives as set out under Chapter 8 (including Objective SMT05 Review of the City Centre Transportation Study, page 287) and Chapter 5 respectively.

The Draft Plan, while seeking a diversity and intensity of city centre offer / mixed use streets along with residential uses, recognises the importance of maintaining commercial uses at ground floor level to ensure street vitality (Policy CCUV16 Category 1 and Category 2 Streets).

The need to repopulate and provide homes in the city centre is included in the Draft Plan. Policy CCUV18 in this Chapter, page 253, states that it is Dublin City Council policy to encourage, support and promote more residential apartments in the city centre as part of mixed-use development or through the reuse / retrofit of the upper floors of existing buildings. In addition, Policy QHSN6 and Objective QHSNO6 of Chapter 5 of the Draft Plan seek to reverse the loss and actively promote residential use on upper floors of buildings in the city through the Living City Initiative and the City Recovery Task Force and its successor and related guidelines to be prepared.

Some submissions seek an amendment to Policy CCUV18 Residential Development page 253 to allow the use of upper floors on Category 1 Streets for residential use. The Chief Executive notes that the Scheme of Special Planning Control O'Connell Street & Environs 2016 and the Scheme of Special Planning Control for Grafton Street and Environs 2019 encourage residential use at first floor level on O'Connell Street and Grafton Street. On this basis, it is recommended that Policy CCUV18 should be amended to support in principle residential use of upper floors for residential use on Category 1 streets.

Submissions received on hotels, student housing, short stay lettings and offices etc. are addressed within this CE Report on Chapters 5 Quality Housing and Sustainable Neighbourhoods and Chapter 6 City Economy and Enterprise.

Following consideration of the Bannon Report (Function of Retail in the City Centre Review of the Dublin City Council Development Plan 2022), the Draft Development Plan maintains the Category 1 and 2 Street designation for the city centre's principal shopping streets but in a, much amended, form to that in the current Dublin City Development Plan. In recognition of changing retail patterns, the Draft Plan focuses the Category 1 allocation to Grafton and Henry Streets only. This is with a view to delivering a predominately high-order retail tenant mix at street level on these streets and promoting premium retail within Dublin. This much reduced Category 1 designation is considered appropriate for the city centre.

The submission in respect of the Royal Hibernian Way is noted. The omission of the Royal Hibernian Way and indeed Lemon Street as Category 2 Streets is a mapping error. On this basis, it is considered appropriate to categorise these thoroughfares as Category 2 Streets.

Policy CCUV19 Parking and the Retail Core seeks the reuse and replacement of car parks in the centre of the retail core to facilitate an improved pedestrian environment and active travel improvements within the retail core. The policy recognises the need for car-based shoppers to access the retail core and, therefore, the need to retain car parks located at the periphery of the retail core. These car parks can be easily accessed by shoppers without disrupting pedestrian flows and would remain essential for short term car parking provision for shoppers and visitors to the retail core. The policy approach is considered appropriate and no change is recommended.

Objective CCUVO5 relates to the city centre only. This does not preclude local laneway initiatives / environmental improvements.

The SPCS for the Grafton Street area was renewed in 2019 and the SPCS for O'Connell Street is under review.

Chief Executive's Recommendation

Chapter 7

Section: 7.5.2 Primacy of the City Centre and Retail Core Area, Policy CCUV18 Residential Development

Page: 253

Amendment:

To encourage, support and promote more residential apartments as part of mixed-use developments or through the reuse / retrofit of the upper floors of existing buildings. The use of upper floors for residential use is supported in principle on Category {1 and} 2 Shopping Streets.

Chapter 7

Section: 7.5.2 Primacy of the City Centre and Retail Core Area, Figure 7.2: Dublin City Centre Retail Core, Principal Shopping Streets

Page: 252

Figure Amendment:

Amend Figure 7.2 Dublin City Centre Retail Core, Principal Shopping Streets, to show route through Royal Hibernian Way (RHW) from Dawson Street towards Grafton Street, and Lemon Street as Category 2 Shopping Streets.

Section: 7.5.3 Key Urban Villages, Urban Villages and Neighbourhood Centres

Summary

The following submissions have been made in respect of Key Urban Villages:

Omni Centre: Santry does not have a properly planned village centre with facilities. It has a poor public realm and needs an active travel plan for connectivity. The Draft Plan does not address this.

Phibsborough: Phibsborough village needs environmental improvements including footbridge to Blessington Basin and connections to green infrastructure. The village / canal should be protected. Specific elements of the expiring City Development Plan (Policies MTO16; MTO19; MTO41 and GIO15) should be included in the next City Development Plan; a Local Environmental Improvement Plan is required for Phibsborough and any plan area should be wider than KUV boundary shown on Map K.

Rathmines: Submission seeks a retail study for Rathmines.

With regard to the urban villages, submissions received in respect of Figure 7.1 Retail Strategy of Chapter 7 state that it fails to show Stoneybatter and a number of other villages; that Sundrive Cross should be identified as an urban village instead of Kimmage and that Kimmage has been demoted.

Submissions call for more policy support for initiatives to extend to urban villages and neighbourhood centres such as Harold's Cross and Ranelagh. Submissions also call for new / improved village centres / local facilities for centres in areas such as Drimnagh and in residential areas within the canals. Submissions state that if such centres are not explicitly named in the Plan, they are disadvantaged and that all urban villages should be subject to village improvement schemes. Recognition in the Plan is sought for business and cultural community organisations such as for the Dorset Street area. A submission from NCBI seeks that the mobility needs of people with disabilities be considered in the locating of housing, education, employment, community facilities in urban villages.

Submissions generally support the 15-minute city role that urban villages play. One submission (Dublin Town) outlines that it does not support the 15-minute city principle as it applies to these centres, as the city is too dispersed with insufficient population to support diversity of services.

Policies to promote and consolidate the role of urban villages (Policy CCUV20 Mixed Use Key Urban Villages / Urban Villages, page 257 and Policy CCUV22 Intensification, page 257) are supported in some instances. Other submissions question what consolidation means and what car parks are being referred to under Policy CCUV22. Others focus on the need for consolidation / intensification and its appropriateness in some urban villages.

The promotion of Co-Working Hubs in Key Urban Villages and urban villages (Policy CCUV24 Co-Working Hubs) is generally supported. One submission does not support the co working model in these centres as it is considered that the core strength of the office environment (training of staff etc.) will be undermined.

Objective CCUV09 (Town Centre Health Checks, page 258) which seeks to progress 'Health Check Assessments' for older suburban Key Urban Villages as part of a plan making process is supported with submissions seeking that it be extended to urban villages and neighbourhoods and inner-city neighbourhoods such as Temple Bar.

Chief Executive's Response

Chapter 2, containing the Core Strategy of the Development plan, identifies that a Local Area Plan (LAP) or Village Improvement Plan (VIP) will be prepared for Phibsborough KUV, Rathmines KUV and Santry / Whitehall (incl. Omni KUV), subject to resources. As noted in the CE's response to a similar issue raised on boundary definition in Chapter 2, Core Strategy, the plan boundaries will be decided when plans are to be prepared at implementation stage.

The Chief Executive agrees that current City Development Plan objectives MTO16 (Blaquiere Bridge) and GIO15 (Mount Bernard Park) should be carried forward into the next Development Plan in Chapters 8 and 10, respectively. Objective MTO19 (Cross Gunns Bridge) has been replaced by SMT017 (Cross Guns Bridge) in the Draft Development Plan. The traffic layout of the junction at Doyle's Corner will be reviewed with Bus Connects – see also Chapter 8 in this CE Report – and, therefore, it is considered that Objective MTO41 is no longer required. A Local Environmental Improvement Plan (LEIP) was prepared for Phibsborough in 2017 and its implementation is ongoing.

The Retail Strategy for Rathmines is set out in the Retail Strategy for the Draft Dublin City Development Plan 2022 – 2028, at Section 6.2 Key Urban Villages and under Table 3 (page 189) in that document. Retail floor space in Rathmines will be reviewed as part of the preparation of a new retail strategy for the Region (Eastern and Midlands) and / or as part of any

'Health Check Assessment' to be prepared as part of the preparation of a Local Area Plan or a Village Improvement Plan.

Figure 7.1 Retail Strategy of Chapter 7, page 248, reflects the retail hierarchy of the city and aligns with the RSES. It denotes the Key Urban Villages (Level 3 District Centres) and the tier below these, Urban Villages. In this context, it is not intended to indicate all urban villages in the city. The CE notes that a number of urban villages are also listed on Table 2 in Section 5.0 Settlement Hierarchy and Level and Form of Retailing in the Retail Strategy Appendix 2, page 182, where it is stated that the list is not exhaustive. The policies and objectives set out in the Draft Plan apply to all urban villages.

Some of the city's urban villages have been identified as requiring land use plans / village plans / environmental improvement plans – see Section 2.7.1 of the Core Strategy in Chapter 2. Harold's Cross and Drimnagh are examples of urban villages that have been identified as requiring Local Area Plan's / Village Improvement Plans, see Table 2-14: Schedule of Other LAPs/VIPs, page 77. Dorset Street has been identified as a candidate area for a Local Environmental Improvement Plan, see Table 2-15: List of Proposed Local Environmental Improvement Plans (LEIPs), page 78.

The preparation of these plans will be subject to resources and a programme of prioritisation.

The Retail Strategy, Appendix 2, sets out under Section 5.0 and 6.0, the Development Plan's vision for urban villages and neighbourhood centres. A wide range of land uses (commercial, community, social and cultural) are permitted in principle and are open for consideration in the city's urban villages as set out in Chapter 14 under Land Use Zoning Objective Z4/Z5 as appropriate. It is not considered necessary to list in Chapter 7.

Issues of accessibility for all is considered through the development management process and is further addressed in detail in section 15.4.4 – Inclusivity and Accessibility.

The city's urban villages (including Key Urban Villages) allow all parts of the city to access a wider variety of commercial, community, social and cultural services locally. These centres are not in direct competition with the city centre. In the interests of sustainability, climate resilience, and the promotion of active lifestyles, the 15-minute city principle is highly applicable to these centres and it is considered appropriate that these centres should be developed on this basis.

Policy CCUV20 Mixed Use Key Urban Villages / Urban Villages seeks to support the development, regeneration and or consolidation of these centres to ensure that they continue to develop as mixed-use centres and so that they can support the concept of the 15-minute City. Some Key Urban Villages and Urban Villages are characterised by low scale shopping centres with extensive surface parking. The purpose of Policy CCUV20 is to support the reimagining of these centres so as to provide more housing / mixed use development along with environmental improvements

The Chief Executive acknowledges that the increase in remote working and the development of co-working hubs would be very beneficial for the city's urban villages. It is acknowledged, at the same time, it could result in challenges for the city centre due to less demand for office space. However, in view of government policy to support remote working / co working hubs nationally, it is considered that co-working spaces should be accessible to all and can act as valuable resources for the local community.

It is considered appropriate to trial Health Check Assessments in the traditional Key Urban Villages of Rathmines, Phibsborough and Ballyfermot as per Objective CCUVO9. The assessments will provide baseline information on the 'vitality and viability' of these centres with checks being carried out in subsequent years to monitor their 'health'.

Chief Executive's Recommendation

The amendment to Chapter 8 incorporating current City Development Plan Objective MTO16 (Blaquiere Bridge) is addressed within this CE Report within the relevant chapter.

The amendment to Chapter 10 incorporating the current City Development Plan Objective GIO15 (Mount Bernard Park) is addressed within this CE Report within the relevant chapter.

No other changes are recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Section: 7.5.6 Food and Beverage Sector / Markets

Summary

Policy in respect of Food and Beverage Sector and Markets have generally been well received. Submissions call for the Iveagh Market and DCC Fruit and Veg Market to be refurbished / protected and for the revitalisation of the markets on Newmarket Square. A submission points out that attempts to maximise the tourism offering at the Iveagh Market has led to dereliction.

Submissions also seek a new objective for markets at Broadstone / Mountjoy Square and a night market on Moore St. Submissions detail that markets have the potential to promote local craft and design / independent and Dublin based business. A related submission points out that warehouse space in city is decreasing and space for indoor markets is diminishing.

A number of submissions seek that Policies CCUV30 Cafes / Restaurants, CCUV32 Outdoor Dining and CCUV33 Support for Markets pertain to the city's Urban Villages and Neighbourhoods. One submission supports the clustering of 'Food and Beverage' uses (Policy CCUV31 Food and Beverage and Section 8.5 of the Retail Strategy, as shown on Figure 4 of the Retail Strategy, Appendix 2, page 197) as it pertains to their development. The 'Dublin Town' submission states that it does not support such clustering as it does not support a mixed-use centre.

Chief Executive's Response

The Chief Executive welcomes these submissions. It is considered that Policy CCUV33 Support for Markets provides sufficient policy support for the development / redevelopment of markets in the city.

The Chief Executive recommends that Objective CCUVO12 Iveagh Market should be amended so that uses other than a major visitor attraction which are compatible with the historic building can be supported.

Policies CCUV30 Cafes / Restaurants, CCUV32 Outdoor Dining and CCUV33 Support for Markets extend to the city's Urban Villages and neighbourhoods.

Figure 4 in Section 8.5 of the Retail Strategy, Appendix 2, Creating Character Areas / Quarters indicatively outlines the existing shopping, cultural attractions and food and beverage clusters in

the city. It also identifies opportunity areas in the city, where the creation of Food and Beverage clusters could be promoted in order to regenerate these areas and to further enhance the appeal of the city's shopping streets.

The identification of these areas as potential Food and Beverage clusters does not preclude a mixture of city centre uses in these areas. Indeed, many of the streets in the identified opportunity areas are Category 2 streets where a mix of uses will be supported / sought.

Chief Executive's Recommendation

Section: 7.5.6 Food and Beverage Sector / Markets

Objective CCUVO12 Iveagh Market

Page: 261

Amendment:

Objective CCUVO12 Iveagh Market

To support a regenerated Iveagh Market as a major visitor attraction **{/ for a compatible use that secures its preservation}** and as a local amenity for the community and to ensure that regeneration proposals include an appropriate community/civic space.

Section 7.5.8 Public Realm

Summary

Submissions welcome DCC's commitment to the public realm as set out in the Draft Development Plan. Submissions comment on the current Dublin City Public Realm Strategy (Your City, Your Space; Dublin City Public Realm Strategy 2012) and its implementation to date and welcome the commitment to prepare a city-wide public realm strategy. It is stated that a new strategy should be city wide and extend to KUV's (including Rathmines). Some submissions note that it will need more ambition / clarity on implementation, provide for climate resilience and involve consultation with entities such as An Post, Irish Water and NCBI. It is detailed in one submission that that it should have a dedicated Public Realm Team for implementation.

Submissions seek: larger plans for pedestrianisation at College Green, the Grafton Street area and Liffey Street; the prioritising of pedestrians in the city retail core; pedestrianisation / footpath widening at Capel Street and Parliament Street; the pedestrianisation of Wynnefield Road / South William Street / Talbot Street; wider pavements for northside businesses; a public realm strategy for the North Georgian Core; a key public space at Marlborough Place; the renovation of Temple Bar Square; restoration of brick pavements at Castle Market and cobblestones in Temple Bar; urban greening for Dorset Street / Broadstone / Parkgate Street; and the implementation of the Greater Dorset Street Together Plan. A submission also seeks that the civic spine concept should be expanded to include Parnell Square to Christ Church Cathedral.

Detailed submissions have been received in relation to the public realm in urban villages and neighbourhood centres. Submissions state that public realm policies / objectives should extend to urban villages and not just the city centre. Submissions state that urban villages must be designed as destinations, including for pedestrians and cyclists, and that the mobility needs of people with disabilities be prioritised / considered in the design of the public realm. The development of laneways in urban villages as green infrastructure is also suggested.

More broadly submissions call for wider street pavements (including to facilitate outdoor dining for peak months of year); universal design in the public realm; new design standards for pavements; recognition of the difficulties facing wheelchair users in the city; the reduction of street clutter (including road signage); 24 hr toilets; more bins; more urban greening / green spaces / parklets; public safety and security in the public domain (which influences the attractiveness of the city); the general prioritising of pedestrians, including at crossing points; the removal of crash barriers; water fountains / seating; greater passive surveillance and crime prevention through design; and innovative approaches to creating more space on public roads for pedestrians.

Submissions also seek that there be personal safety / gender auditing / gender impact assessment and age proofing as part of any plan making process.

Chief Executive's Response

It is the Council's intention to review the Dublin City Public Realm Strategy 'Your City Your Space' 2012. It is anticipated that this will be a city-wide strategy. The preparation of such a strategy will involve public consultation with stakeholders in the public domain, interested parties and the general public. Section 7.5.8 of the Draft Development Plan sets out the overarching elements of what makes a quality public realm e.g. achieving connections / permeability / pedestrian comfort / a sense of place / safety / gender proofing / climate resilience etc. It is anticipated that the review of the current Dublin City Public Realm Strategy 'Your City Your Space' 2012 will encompass and seek to address all these elements. The Draft Plan contains extensive policies and objectives to support the enhancement of the public realm, improve security and accessibility for all – policies CCUV37 to 43 and objectives CCUVO13 to 19 refer.

The Chief Executive notes the extensive suggestions for public realm interventions / initiatives as set out in submissions. Some of these already form part of existing public realm strategies and others may come forward under future local area plans / village improvement plans / local environmental improvement plans etc. Outside of the Development Plan process / statutory plans, the Council will continue to initiate and carry out local environmental strategies / plans and similarly to support local community led environmental / public realm projects.

As noted in the CE response to Chapter 4 the civic spine is clearly defined in the glossary as a route through the city centre from Parnell Square, through O'Connell Street, College Green to Christchurch Place. The CE notes that the College Green plaza project has now become College Green Dame Street Project and the CE recommends that Policy CCUV013 should be amended to reflect the new scope of this project.

Chief Executive's Recommendation

Chapter 7

Section: 7.5.8 Public Realm, Objective CCUVO13

Page: 265

Amendment:

Objective CCUVO13 Civic Spine / College Green Dame Street Project ~~(College Green)~~

To implement a programme of environmental and public realm improvements along the Grand Civic Spine from Parnell Square to Christchurch Place and along the city quays, and to prioritise ~~(the redevelopment of College Green as a pedestrian friendly civic space including the~~

~~pedestrianisation of Foster Place)~~ {and deliver the redevelopment of College Green and parts of Dame Street as the premier civic space for the city with a traffic free world class public realm,}

Chapter 7

Section: 7.5.8 Public Realm,

Page: 265 Insert a new Policy after CCUV41, subsequent numbering to be amended accordingly

Amendment:

{Policy CCUV42 Public Realm – City Centre

To move to a low traffic environment generally and to increase the amount of traffic free spaces provided in the city centre over the lifetime of the Plan as well as create new high quality public realm areas where possible.}

Section: 7.5.7 Evening and Night Time Economy

Summary

There is general agreement that the development of the Night Time Economy can be positive for the city. Submissions point out that for the city to be truly 24/7, the following is required: vision for the night time economy; the range of activities between 6pm and 6am needs to be defined; better bus services / public transport is required; there needs to be better policing of streets; methadone clinics should be removed; all businesses / the community must be involved; there should be 24-hour health and personal social services; the development of the night time economy should be connected to creative and cultural strategies; the needs of those who wish to participate in evening activities outside of settings in which alcohol is sold or consumed should be accommodated; promotion activities which support night time cultural and leisure activities and a safe and active public realm.

Dublin Bus has indicated that it would support roll out of night time services.

Submissions seek policies / objectives to: develop a register of creative assets; support / recognise the role of small/independent venues in the city; to recognise the role of hotels / hospitality sector in the city centre and centres such as Ranelagh; to address the loss of night clubs.

It is stated that the development of the night time economy should not be at the expense of residential amenity as is the case in Temple Bar. There is a general concern that streets music venues / pubs should have acoustic control to prevent impact to residential properties. Dublin Town points out that this conflict can be avoided through the use of 'Purple Flag' structures. While Dublin Town supports the agent of change principle for cultural venues another submission opposes it.

Chief Executive's Response

The Government published the *Report of the Night-Time Economy Taskforce* in September 2021. This report engages with and seeks to meaningfully address many of the opportunities and challenges present in developing the night time economy. The issues raised in submissions

on the Draft Plan's night time economy policies and objectives reflect those discussed in the referred national report.

The Report of the Night Time Economy Taskforce sets out solutions / further actions required to support the night time economy. Policy CU21 in Chapter 12 Culture, page 453, states that it is Council policy to be guided by the recommendations of this report and to seek that Dublin is selected as a pilot for the creation of a Night Time Advisor and stakeholder committee.

As policy in this area is evolving, it is considered that Policy CCUV35 Night Time Economy as set out in the Draft Plan sufficiently supports the development of the evening / night time economy in the city.

To protect residential amenity from noise emanating from night time uses, the Draft Plan contains the following policies / objectives:

- Policy CCUV36 New Development, seeks to protect the amenity of existing residential from potential noise disturbance from new night time uses.
- Objective CUO34 Noise Impacts, Chapter 12, Culture, page 453, seeks to ensure that new residential development adjacent established late-night uses, through its design and the use of sound insulation will not conflict with established night time uses.
- See also Chapter 12, Culture, Section 12.5.4 Supporting Key Cultural Activities Night Time Cultural Activities, page 452

It is considered that the above policy and objective are sufficiently robust enough to protect residential amenity.

Submissions received in respect of night time uses, residential amenity and the policy principle - 'agent of change' are addressed within this CE Report in:

- Chapter 15 - 15.14.12 Night Clubs/Licenced Premises/Casinos/ Private Member Clubs
- Chapter 12 Culture - Section 12.5.4 Supporting Key Cultural Activities

Chief Executive's Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Section: 7.5.9 Outdoor Advertising Strategy

Summary

Submissions received comment that Policy CCUV44 Advertising Structures does not sufficiently consider the impact of Outdoor Advertising on the visual / historic amenities of an area / urban centre. Submissions seeks that wall spaces currently used for advertising could be more appropriately considered for community gain or educational use. A submission requests that the council seek the reduction of existing signs.

Another submission outlines that outdoor advertising can support retailing / the 24 hr city and seeks that policy CCUV44 / Appendix 17 Outdoor Advertising Strategy is amended so that it is less restrictive in relation to the provision of commercial advertising on buildings.

Objective CCUVO20 (Audit of Redundant Signage) is well received in submissions with some stating that there is too much street clutter and that the existing objective in the current plan has never been carried out.

Submissions comment that its scope, including geographical extent, is unclear / does not go far enough. It is suggested that street clutter including road cabinets, excessive directional traffic/warning signs, flags, the proliferation of used signage and poles etc. should be included and consequently rationalised / reduced by 50% / omitted. Finally, it is stated that the audit should extend to urban villages and neighbourhoods such as Kimmage Road Lower.

Chief Executive's Response

Submissions received on Policy CCUV44 Advertising Structures are addressed within this CE Report within the section on the Advertising and Signage Strategy (Appendix 17: Advertising and Signage Strategy).

The Council started to remove redundant signage / poles in the city in 2016 and this work is ongoing. The audit referred to in Policy CCUV44 concerns unused signs and all unused sign poles. The geographical extent of the audit is citywide.

Chief Executive's Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Figure 7-1

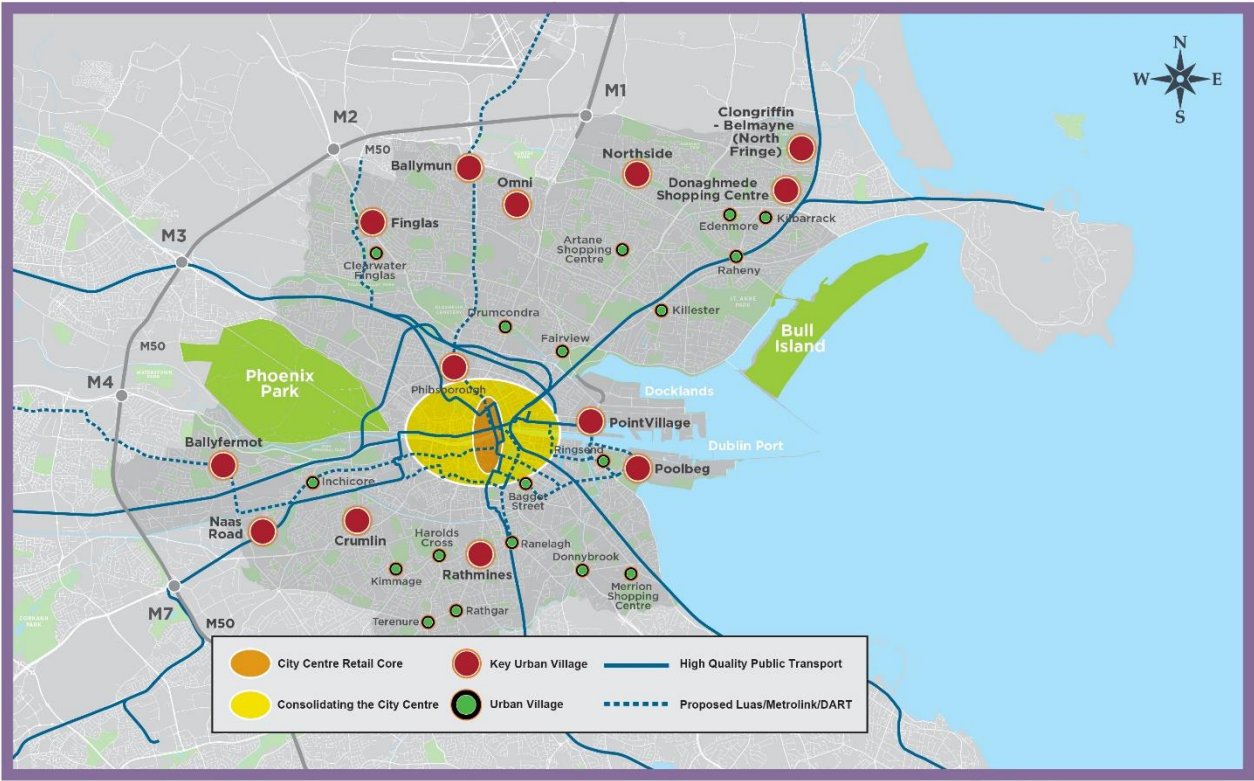
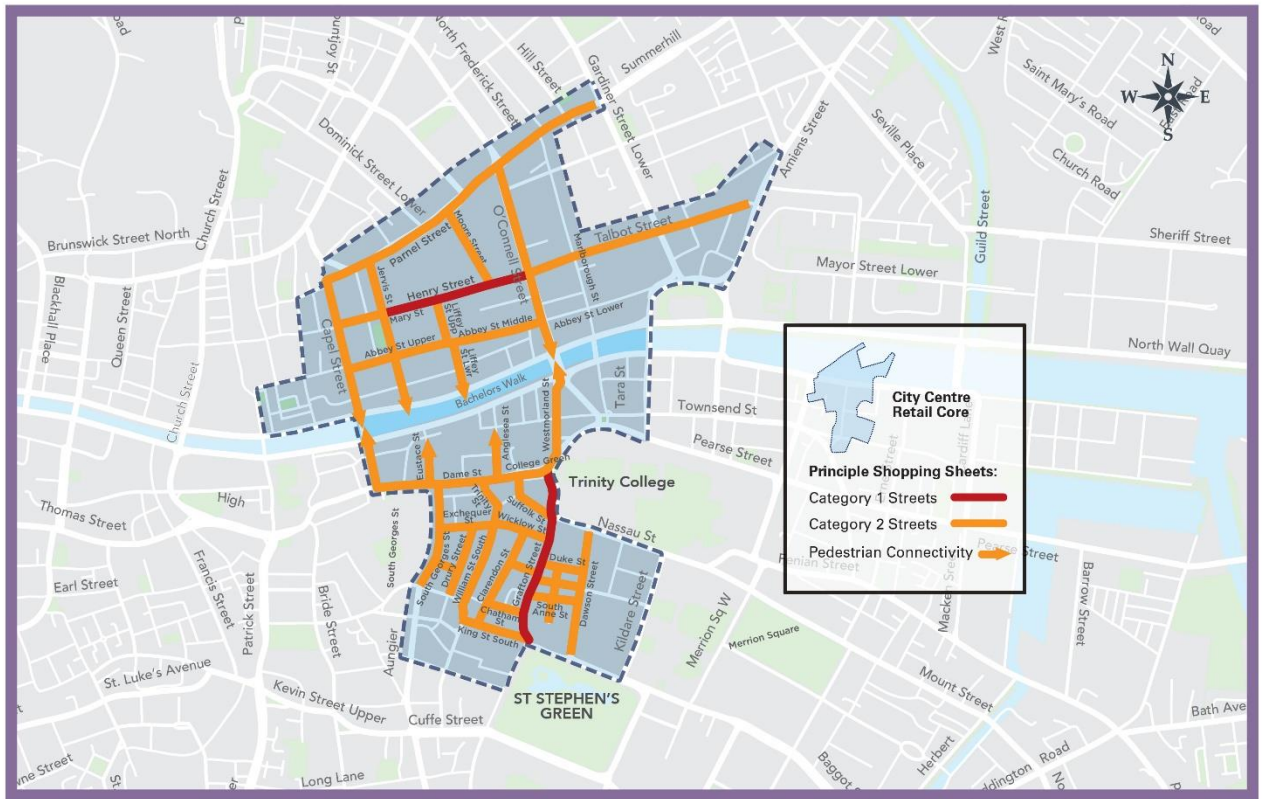


Figure 7.2



Chapter 8: Sustainable Movement and Transport

Chapter 8: Sustainable Movement and Transport

Submission Number(s):

0003, 0006, 0253, 0379, 0390, 0391, 0453, 0594, 0609, 0626, 0642, 0673, 0678, 0718, 0759, 0761, 0773, 0784, 0800, 0801, 0823, 0825, 0829, 0853, 0887, 0888, 0890, 0919, 0929, 0931, 0939, 0949, 1011, 1017, 1025, 1033, 1037, 1038, 1048, 1049, 1075, 1083, 1093, 1096, 1145, 1187, 1190, 1191, 1194, 1201, 1207, 1212, 1226, 1238, 1263, 1264, 1283, 1298, 1305, 1306, 1307, 1310, 1320, 1343, 1353, 1358, 1370, 1380, 1383, 1386, 1387, 1402, 1406, 1407, 1427, 1438, 1448, 1454, 1469, 1472, 1474, 1477, 1479, 1480, 1488, 1507, 1513, 1523, 1553, 1555, 1562, 1563, 1564, 1568, 1579, 1585, 1592, 1624, 1633, 1653, 1666, 1676, 1679, 1689, 1701, 1709, 1713, 1733, 1742, 1743, 1747, 1749, 1755, 1762, 1767, 1769, 1771, 1784, 1786, 1795, 1799, 1803, 1811, 1816, 1821, 1826, 1829, 1834, 1843, 1848, 1849, 1850, 1851, 1860, 1875, 1881, 1884, 1892, 1960, 1961, 1971, 2072, 2085, 2086, 2087, 2096, 2114, 2116, 2119, 2120, 2121, 2129, 2139, 2144

Section 8.5.1 Addressing Climate Change through Sustainable Mobility

Summary

A number of submissions welcome the inclusion of target mode shares within the Draft Development Plan and the ambition of modal shift in reducing the dominance of the car within the City, including the NTA which recommend additional commentary is included to clarify the source of the Canal Cordon data. However, a number of submissions, including from the Dublin Cycling Campaign, recommend that the target for walking and cycling should be more ambitious and significantly increased to reflect the urgency around climate action and the support towards choosing more sustainable modes of transport. One submission also recommends separating cycling and micro mobility in the mode share targets. Another submission sought to clarify how taxi journeys are to be accounted for and how the mode share targets translate into reductions in carbon emissions.

Chief Executive's Response

The submissions in support of the inclusion of mode share targets within the Development Plan are noted and welcomed by the CE.

The NTA comments regarding the mode share targets and their limitations in regards to location and time of day are noted and addressed further in the CE response to their submission.

The mode share targets included in the Draft Plan are considered to be ambitious in the context of the 6-year lifespan of the Development Plan. The existing mode shares are based on the Canal Cordon Count and it is proposed to add a clarification to Table 8-1 in this regard. However, the Target Mode Share as outlined in Table 8-1 and Policy SMT01 are considered applicable to the City as a whole. The increase in micro-mobility in the City in recent years is noted and reflected in policies and objectives throughout Chapter 8, including Section 8.5.6 Sustainable Modes, Micro-Mobility and Shared Mobility. At present there is no parameter in which to accurately measure the number of trips made by various forms of micro-mobility and in this context, it would not be considered appropriate to separate the target of cycling/micro-mobility until such time as an accurate recording method has been established. As the role of micro-mobility increases, the ability to establish a tangible metric for this may come to fruition during the lifetime of this Plan and could be considered for inclusion in the next Plan.

Taxis are essentially a form of public transport and as such are included in the metrics for that category. It is not considered appropriate to separate out this form of transport. With regard to measurement of emission reductions, this matter is addressed in Chapter 3 – Climate Action.

Chief Executive's Recommendation

No change is recommended to section 8.5.1 as existing text satisfactorily responds to issues raised, save for amendments recommended in the response to the submission from the National Transport Authority (NTA).

Section 8.5.2 Effective Integration of Land use and Transportation

Summary

One submission notes that the statement about encouraging higher density development around public transport routes should be re-evaluated as those located on the periphery of these routes are able to access them but that public transport is full shortly after leaving the outskirts of Dublin. In relation to Policy SMT3, a submission states that the transport network needs to consider travel as a whole in its broadest terms and not just commuter transport. Submissions also noted concerns regarding integrating land use and transportation when taking into account timescales for delivering public transport projects and also the delivery of public transport being outside the control of Dublin City Council.

Chief Executive's Response

In the integration of land use and transport and the development of the 15 Minute City, this Plan encourages higher density development around areas with good public transport links. In providing high quality pedestrian and cycling infrastructure at these nodes, it encourages the use of more sustainable modes. The comments in the submission around capacity are noted and this falls within the remit of the relevant transport providers such as the NTA and TII. The Draft Transport Strategy for the Greater Dublin Area 2022-2042 sets out the planned transport infrastructure proposals for the GDA, many of which will commence within the lifetime of the Plan. DCC is committed to working with the transport agencies in achieving compact growth within the City (Policy SMT1).

Together with the development of robust mobility management strategies for development sites through the planning application process, DCC seeks to ensure that there are a wide range of sustainable transport options for developments. In relation to commuter transport, it is considered that Policy SMT3 reflects the provision of an integrated transport network for all communities and businesses in DCC and does not relate solely to commuter transport. There are a number of policies in the Draft Plan that address commuter parking and actively promote the use of more sustainable modes for all forms of travel, both business and leisure and commuter. It is considered that the Draft Plan sufficiently addresses the concerns raised.

Chief Executive's Recommendation

No change is recommended to Chapter 8 as existing text satisfactorily responds to issues raised.

Summary

A submission notes that mobility management plans should be utilised for all kinds of developments that generate traffic (e.g. schools, sports clubs etc.) in addition to commercial and retail developments.

Chief Executive's Response

The CE agrees that mobility management and travel planning should be used for all range of developments. In addition to the policies in Chapter 8 of the Draft Plan, further details on mobility management are provided for in Appendix 5 whereby the need for such plans are determined at pre-application stage in consultation with Dublin City Council as well as in Chapter 15, Section 15.2.3 where thresholds are proposed for documentation to be submitted with planning applications. It is considered that the Draft Plan sufficiently addresses the concerns raised.

Chief Executive's Recommendation

No change is recommended to Chapter 8 as existing text satisfactorily responds to issues raised.

Section 8.5.3 Public Realm, Place Making and Healthy Streets

Summary

Submissions outline that Policy SMT8 should be amended to specifically mention the Temple Bar Public Realm Plan and the Greater Dorset Street Together Plan as well as expanding the public realm enhancement schemes to Key Urban Villages. Another submission notes that Policy SMT8 should have a specific target set for enhanced public realm and pedestrian prioritisation. It has been noted in a submission that an audit should be done throughout the city to reduce lane width and extra space allocated to wider footpaths and pocket parks/greenery. Another submission notes that the Public Realm Strategy should apply citywide. Reference was also made to the Public Realm Strategy of the Council needing to be updated. A submission from Diageo fully supports Policy SMT8 which provides for public realm enhancements. A submission recommends that a review of what is located within a 15 minute walk distance of public transport stations is carried out.

Chief Executive's Response

The reference to various other plans are noted in the submission. It is not considered necessary to provide an exhaustive list as part of the policy as a wide range of key projects and development areas are already provided for in the Public Realm Strategy and Public Realm Masterplan, with many permitted Part 8s progressing on various projects. It is noted that the Dorset Street Together Plan is referred to on page 77 of the Draft Plan. In relation to the allocation of extra space to wider footpaths and green areas, there are many policies in the Draft Plan in Chapter 7 and Chapter 8 relating to the provision of high-quality public realm and improved pedestrian facilities which support the concerns raised. It is not considered feasible to do a full audit of every street in the City to identify where road widths can be reduced; however improvements to public realm are reviewed as part of new developments with private developers and as part of various schemes proposed by Parks and Public Realm, as well as those which

have been submitted for funding from Government (e.g. Urban Regeneration and Development Fund (URDF)). It is considered that the Draft Plan sufficiently addresses the concerns raised.

With regard to the Public Realm Strategy, it is acknowledged that the strategy was adopted in 2012 and that it may require updating. It is considered reasonable to include a new objective to review and update the Public Realm Strategy within the lifetime of the Plan.

Chief Executive's Recommendation

Chapter 8

Section: 8.5.3 Public Realm, Place Making and Healthy Streets

Page: 284

Insert New Objective after Policy SMT9, subsequent numbering to be amended accordingly

{Objective SMT02 Public Realm Strategy

To review and update the Public Realm Strategy 'Your City-Your Space' within the lifetime of the Plan.}

Section 8.5.4 Accessibility for All

Summary

A number of submissions note that greater reference should be made to accessibility for people with mobility impairment and disabilities and note that the policies surrounding the 15-minute city concept and providing a walkable city with mixed mobility do not recognise that there are a variety of users that do not live in close proximity to public transport links. A number of suggested additions to the various policies and objectives to include reference to wheelchair and mobility impaired users have also been noted in the submissions. Additional wording to Objective SMT04 has also been suggested in relation to the provision of wheelchair accessible taxi ranks. Suggestions have also been raised in one submission regarding the relocation of taxi ranks where they impede the proper provision of sustainable transport infrastructure including walking, cycling and public transport.

Submissions noted in relation to Policy SMT10 welcomed the improvement of the pedestrian network in the city and that improving the pedestrian network can be done by using better paving materials and quicker reinstatement of damaged footpaths. A submission also raised that Objective SMT02 should be expanded to include the provision of raised crossings where side roads meet main roads in order to prioritise pedestrians crossing at these junctions. A submission also seeks revisions to Objective SMT03 to expand the provision of public accessible parking bays to be both on-street and off street and to standards set out by the Wheelchair Association of Ireland.

Chief Executive's Response

There is a wide range of existing policies and objectives within the Draft Plan that promote and support universal design principles. Section 7.5.8 in Chapter 7 outlines that all public realm should be guided by universal design principles and regard should be had to the UN Convention on Rights of Persons with Disabilities (UNCPRD) and the National Disability Inclusion Strategy, 2018. However, it is recommended that the wording of the Policy SMT10 can be amended to

address accessibility for all within the protection, improvement and expansion of the pedestrian network.

The location and type of taxi ranks is dealt with through bye-laws and not the Development Plan. However, it is recommended that the wording of Objective SMT04 be revised to address accessibility for all in a more clear and concise manner.

The maintenance and repair of footpaths is an operational matter and outside of the scope of the Development Plan. However, it should be noted that Dublin City Council's Public Realm Strategy ('Your City- Your Space') sets out guidance for the design, maintenance and management of the public realm and this strategy is supported by Policy SMT8.

Dublin City Council is responsible for the provision of public on-street parking, including accessible parking spaces. Off-street parking is subject to standards set out in Appendix 5 where a minimum of 5% of all car parking spaces must be accessible spaces. All public and private spaces are provided in accordance with Part M of the Building Regulations (2010), Traffic Signs Manual (2019) and any other relevant guidelines. It is not considered necessary to reference specific guidelines in the Development Plan which relate more to operational matters in implementation.

Chief Executive's Recommendation

Chapter 8

Section: 8.5.4 Accessibility for All

Page: 285, Policy SMT10

Amendment:

Policy SMT10 Pedestrian Network

To protect, improve and expand on the pedestrian network ~~(inclusive of facilities for people with mobility impairment and/or disabilities, including the elderly and people with children.)~~ linking key public buildings, shopping streets, public transport points and tourist and recreational attractions {whilst ensuring accessibility for all, including people with mobility impairment and/or disabilities, older persons and people with children.}

Chapter 8

Section: 8.5.4 Accessibility for All

Page 285, Objective SMT04

Amendment:

Objective SMT04 Taxi Ranks

To ensure the City is provided with adequate ~~(and accessible)~~ taxi ranks and facilities, {accessible and inclusive for a range of users} and to engage with the National Transport Authority and representatives of the taxi industry regarding provision of same.

Section 8.5.5 City Centre and Urban Villages- Access and Functional Needs

Urban Villages

Summary

A number of submissions support Policy SMT11 and the reallocation of space to pedestrians and public realm and suggest the implementation of such improvements to specific areas of the City. Another submission offers the suggestion that various locations should be identified for public realm and pedestrian improvements. Support is given to the role of the 15 Minute city in urban villages and that priority should be given to areas with lower socio-economic profiles. In relation to the reallocation of city centre road space in Policy SMT13, suggestions are made to alter the wording to ensure priority is not given to the private car over pedestrians.

A number of submissions welcome Objective SMT05 to review the City Centre Transport Study, including a submission from Iarnród Éireann who would welcome engagement with DCC and the NTA as the study is developed. A number of submissions made reference to various local neighbourhoods and made suggestions to upgrading of the existing pedestrian and cycle environment as well as wider connectivity improvements.

Chief Executive's Response

Dublin City Council's Public Realm Strategy ('Your City – Your Space') and the Public Realm Masterplan for the City Core (The Heart of the City) set out guidance for design, maintenance and management of the public realm and focus on a range of public realm projects in the city which DCC is committed to supporting and progressing. Policies SMT30 and SMT31 commit to complying with the design approach and principles contained within the Design Manual for Urban Roads and Streets (DMURS) and as well as supporting the Road User Hierarchy as defined by national guidance in the NTA's Transport Strategy for the Greater Dublin Area. Having regard to the major public transport proposals that will commence within the lifetime of the Draft Plan, priority for pedestrians and pedestrian spaces and provision of high-quality public realm will underpin the vision for the future of the city and will be developed further in the review of the City Centre Transport Study. It is considered that the Draft Plan sufficiently addresses the concerns raised.

Chief Executive's Recommendation

No change is recommended to Chapter 8 as existing text satisfactorily responds to issues raised

Servicing

Summary

A number of submissions support the principles of 'last mile' delivery and the repurposing of multi storey car parks for the development of micro hubs. Concern has been raised in a submission from Diageo about addressing the servicing needs of the brewery and request that specific policy is included to protect the access points to the brewery and existing traffic movements associated with the workings of the brewery in particular, where upgrades to cycling infrastructure are proposed. An Post in their submission supports the preparation a Servicing/Logistics Strategy for the City and request direct engagement during its preparation. The importance of providing service access to cultural spaces within the city and to allow these facilities to function is highlighted in one submission. Potential contradiction between supporting

initiatives outlined in Chapter 12 and the public realm improvements promoted in Chapter 8 was noted in one submission.

Chief Executive's Response

The support for 'last mile' delivery and its development are noted and welcomed by the CE. Concerns raised in relation to the servicing requirements by Diageo and An Post are noted. All improvements to the road network in terms of enhanced pedestrian, cycling and public realm improvements take account of the existing operations in an area and Policy SMT23 sets out the commitment by DCC to balance the operational needs of the City alongside those of businesses and kerbside activity in facilitating sustainable transport provision. It is considered that the development of a Servicing\Logistics Strategy for the City and urban villages (Objective SMT06) will provide the opportunity to work with stakeholders such as Diageo and An Post to ensure their continued operations. The reference to servicing for cultural spaces is noted. Policies regarding servicing and the preparation of a servicing strategy relate to all uses within the city. The servicing requirements of specific developments, uses and/or events are generally addressed through the development management or event management processes. It is considered that the Draft Plan sufficiently addresses the concerns raised.

Chief Executive's Recommendation

No change is recommended to Chapter 8 as existing text satisfactorily responds to issues raised.

Section 8.5.6 Sustainable Modes

Active Travel – Walking and Cycling

Summary

Submissions raised the need to provide greater provision for and to improve the prioritisation of pedestrians across the city including the urban villages in order to encourage people to walk. A number of submissions raised the need for physical interventions including the installation of pedestrian crossings including zebra crossings, raised tables, increased footpath widths, shared surfaces/home zones, reallocation of road space, reduced footpath clutter and addressing safety issues for pedestrians across the city as a matter of priority. Positive comments on measures to footpaths and crossings implemented during Covid were noted in a number of submissions. One submission flagged a number of streets across the city as potentially suitable for pedestrianisation and some sought for the full city centre to be pedestrianised. Concerns regarding the focus on public realm within the city centre rather than across the city was noted in some submissions. Exploring connectivity via laneways across the city was also noted and the positive impact this could have on public realm and 15-minute city. A number of submissions flagged that increased enforcement of footpaths and cycle lanes was required to remove obstruction by parked vehicles.

Submissions commended the cycling section within the Plan for being ambitious, although it was considered that it was light on targets, policies and objectives. A number of submissions noted that more should be done within Dublin to encourage and facilitate cycling by people of all abilities, gender and ages. Emphasis on providing safe, connected, legible and segregated cycle routes and for the upgrading of existing infrastructure to same are noted in many submissions. Submissions flagged concerns regarding bollards introduced during Covid and the impact on the public realm and also sought clarity on long term solutions including increased provision of quiet

cycle routes i.e. laneways, canal, side streets etc. Submissions flagged the need for new or improved cycle lanes along major thoroughfares within the city centre and the arterial routes fanning out from the Grand Canal. Submissions referenced that all streets should have cycle lanes whilst others expressed concerns regarding the impact on the roads, junctions and traffic by introducing cycle lanes, preferring off-road solutions. The need to integrate cycle infrastructure with public transport projects was noted in a number of submissions. Reference was made to the need for transportation planning in Dublin to prioritise the rollout of the Greater Dublin Area Cycle Network Plan and to anticipate the updated version of this plan.

A number of the submissions flagged the successful Dublin Bike Scheme and sought further expansion of the scheme. Areas such as Ringsend and Irishtown and Grand Canal were noted as being appropriate for same.

In regards to specific policies within the section, support for Policy SMT15 Walking, Cycling and Active Travel was noted. A request for this policy to be expanded to include road reallocation and disincentives for private car use was also noted. Submissions on Policy SMT16 Active Travel Initiatives, recommended that the policy is amended to include a target for the number of children cycling to primary school. Submissions noted that more emphasis on permeability should be incorporated into Policy SMT17.

In regards to Objectives SMT07 to SMT013, submissions noted that these should be changed to policies. Minor wording changes to Objectives SMT07, SMT08, SMT010 and SMT011 were sought, as was a reference to public transport projects, improved cycle parking and access measures and a commitment to deliver Cycle Parking Standards within two years. Submissions recommended additional objectives relating to a pedestrian/cyclist bridge over the railway line at Whitworth Road connecting the Royal Canal to Whitworth Road, and for the provision of increased footpaths widths through the reallocation of parking and private car space.

As noted in the CE response to Chapter 7, submissions were made requesting that MTO16 of the current 2016 plan is carried forward to the Draft Plan.

Chief Executive's Response

The CE welcomes the support for measures implemented during Covid to improve both the pedestrian and cycling environment. The support for further improvement to improve both permeability and safety are also noted. The CE considers that matters raised in regards to prioritising and facilitating an improved pedestrian environment across the city are addressed within policies SMT15 to SMT18 as well as Objective SMT007 and SMT009. The CE however, recommends that reference to 'safe' is added to Policy SMT15 Walking, Cycling and Active Travel and that reference to permeability and laneway connectivity is added to policy SMT17 The Pedestrian Environment.

The CE welcomes the support for the provision of increased cycle lanes across the city. There is a clear emphasis and prioritisation within the Draft Development Plan to deliver improved facilities as outlined in Policy SMT15 and Objective SMT08. As noted above, the CE agrees that an emphasis on delivering safe and connected pedestrian and cycling environments should be added to Policy SMT15 Walking, Cycling and Active Travel.

The CE welcomes the support for the Dublin Bike Scheme and the ongoing support for the expansion of shared bike scheme models across the City is covered under Objective SMT018 Shared Bike Schemes and Micro-Mobility Schemes.

The support for Policy SMT15 is welcomed. It is considered that the prioritisation of active travel within the design of the street environment is sufficiently covered by Policy SMT31 Street and Road Design. No change is recommended to the wording of Policy SMT15.

Under Policy SMT16, the CE recognises that a significant increase is required, however, it is difficult to set a specific target where the baseline is somewhat unknown and where there are limited quantitative measurables to measure progress against. It is however, recommended that Policy SMT16 is amended to remove reference to children cycling to primary school and that Policy SMT19 Walking and Cycling for School Trips is expanded upon to incorporate the need to promote increased active travel for school journeys (see section Active Travel and Schools below).

In regards to Policy SMT17, the CE recommends the policy is further amended to include reference to permeability.

The CE welcomes the general support for Objectives SMT07 to SMT013. The CE recommends the addition of the wording to Objective SMT07. The CE considers that the wording of SMT08 provides a clear emphasis and preference towards protected cycle lanes within the City, but also recognises that constraints of the existing road network may not allow for this in certain circumstances. Objective SMT08 also recognises the rollout of the Greater Dublin Area Cycle Network Plan. The integration of walking and cycling with public transport is covered under Policy SMT17. The scope of Objective SMT010 relates mainly to cycle parking stands e.g. Sheffield stands located within the public roads and footpaths and where there is limited scope to provide sheltered parking and increased security measures beyond facilitating front and rear wheel locking options.

In regards to Objective SMT011, the CE notes that the forthcoming design standards for cycle parking in developments would cover a wide range of criteria relating to type of cycle stands, shelter, security, access, lighting etc. It is considered reasonable to amend the objective to ensure these standards are developed within 2 years of the adoption of the Plan. Planned bridges are listed under Objective SMT023. There are currently no plans for a pedestrian/cycle bridge connecting the Royal Canal to Whitworth Road beyond the existing junctions at Drumcondra Road Lower and Prospect Road. The CE considers that improvements to the existing pedestrian network are covered under Policy SMT17.

The CE considers it appropriate to carry forward Objective MTO16 of the current 2016 plan (Blaquiere Bridge) to the Draft Plan.

Chief Executive's Recommendation

Chapter 8

Section: 8.5 Policies and Objectives; Subsection 8.5.6 Sustainable Modes;

Subheading Active Travel – Walking and Cycling

Page: 290

Amendment:

Policy SMT15 Walking, Cycling and Active Travel

To prioritise the development of **{safe and connected}** walking and cycling facilities and **{prioritise} (encourage)** a shift to active travel for people of all ages and abilities, in line with the city's mode share targets.

Chapter 8

Section: 8.5 Policies and Objectives; Subsection 8.5.6 Sustainable Modes;

Subheading Active Travel – Walking and Cycling;

Page: 290

Amendment:

See also SMT 19 below.

Policy SMT16 Active Travel Initiatives

To promote and help develop community-based coordinated initiatives at local level that encourage active travel and modal switch to sustainable transport modes, and to target underrepresented cohorts/groups in such initiatives. ~~(and specifically to target a significant increase in the number of children cycling to primary school).~~

Chapter 8

Section: 8.5 Policies and Objectives; Subsection 8.5.6 Sustainable Modes;

Subheading Active Travel – Walking and Cycling

Page: 290

Amendment:

SMT17 The Pedestrian Environment

To continue to maintain and improve the pedestrian environment and ~~(promote)~~ {strengthen permeability by promoting} the development of a network of pedestrian routes {including laneway connections} which link residential areas with recreational, educational and employment destinations to create a pedestrian environment that is safe, accessible to all in accordance with best accessibility practice.

Chapter 8

Section: 8.5 Policies and Objectives; Subsection 8.5.6 Sustainable Modes;

Subheading Active Travel – Walking and Cycling

Page: 291

Amendment:

Objective SMT07 Review of Temporary Pedestrian and Cycling Improvement Interventions

To review the temporary pedestrian and cycling improvement / interventions undertaken as part of Covid-19 mobility measures in 2020/2021, with a view to {upgrading and} implementing permanently the successful routes through the Roads Act, Part 8 or other appropriate mechanisms.

Chapter 8

Section: 8.5 Policies and Objectives; Subsection 8.5.6 Sustainable Modes;

Subheading Active Travel – Walking and Cycling

Page: 291

Amendment:

Objective SMT011 Design Standards for Cycle Parking in Developments

To prepare, ~~(in the lifetime of the plan)~~, {within two years of the adoption of the Plan} a comprehensive guide setting out design standards and requirements for cycle parking in developments.

Chapter 8

Section: 8.5 Policies and Objectives; Subsection 8.5.6 Sustainable Modes;

Subheading Active Travel – Walking and Cycling

Page: 291

Amendment:

Add new objective, subsequent numbering to be amended accordingly

{Objective SMT014 Blaquiére Bridge

To seek to reopen the pathway underneath Blaquiére Bridge on the North Circular Road beside the Old State Cinema in Phibsborough to pedestrians and cyclists.}

Active Travel and Schools

Summary

Submissions welcome the narrative and policy relating to active travel and schools. One submission suggests that the promotion of walking and cycling initiatives should be expanded to include universities. Submissions noted that the continued increase in car usage for school and work journeys have not been acknowledged and that this increase has been accelerated by Covid.

Submissions recommended a new policy after SMT19, relating to the provision of cycle infrastructure and specifically ‘to identify gaps in proposed Busconnects cycling infrastructure and to build cycling links between proposed bus corridors, to ensure a continuous walking and cycling network in the city’.

Chief Executive’s Response

The CE notes that Policies SMT18 and SMT20 address the integration of active travel and public transport and Objective SMT08 outlines improvement to and the creation of cycle routes throughout the city. It is considered that the Draft Plan sufficiently addresses the concerns raised. It is considered reasonable to expand the policy approach in this section to include third level education taking into consideration the wide number of third level education facilities within the City. In expanding the section to cater for third level facilities, it is recognised that all educational facilities from childcare facilities to third level should be addressed.

Chief Executive’s Recommendation

Chapter 8

Section: 8.5.6 Sustainable Modes, Subheading Active Travel and Schools

Page: 292

Amendment:

Change title of subheading:

~~{Active Travel and Schools}~~ {Active Travel –Childcare Facilities, Schools and Third Level Institutions.}

Amend Policy SMT19 as follows:

Policy SMT19 Walking and Cycling for School Trips

1. {To prioritise and target a significant increase in the number of children walking and cycling to and from schools.}
2. To promote walking and cycling for school trips ~~(through the)~~ {to all educational facilities};
3. {To promote and support} ~~(promotion of)~~ initiatives such as “Safe Routes to School”, the ‘Green Schools’ and ‘Schools Streets’ projects, and to prioritise school routes for permeability projects and provision and enhancements of pedestrian and cycle ways.

Public Transport

Summary

A number of submissions noted support for public transport projects including BusConnects, Metro, Luas and Dart+ and wider environmental benefits were noted. In addition, submissions made reference to Metro South. However, submissions also expressed concerns regarding impacts associated with these projects including routing of services and impact on existing services. Submissions expressed concerns regarding the capacity of existing public transport provision, the timescale for delivering new public transport projects and the lack of integration with land use planning in places. On the latter, submissions expressed concern with the lack of control by Dublin City Council to plan and deliver public transport systems and how that impacts negatively on the potential for integrated transport and land use planning. Other submissions called on DCC to commit to deliver these projects. Submissions also raised concerns with the lack of focus on public transport beyond the city.

Submissions stated that public transport projects such as Busconnects, Metro, Luas and Dart+ should be referenced within the Plan to correspond with the NTA Strategy. Furthermore, submissions noted that the BusConnects project should be mapped within the Plan and Dublin Port noted that the main rail line (orange) on Map J should be extended to the port to reflect operational infrastructure. An additional policy expanding on Policy SMT21 to support the increase in the capacity of existing rail freight links into Dublin Port was also recommended.

Submissions noted that greater priority needed to be given to public transport including reallocation of road space and submissions noted that all streets should have a bus and a cycle lane. Submissions also noted that there are too many bus stops in the city and there are too many bus routes congregating on the quays. A demand for better services from public transport providers in the city was raised and shortfall relating to existing bus services were noted in some submissions. TII noted the need to maintain the resilience of existing transport assets such as rail (light and heavy) as well as the existing road networks.

Others noted that the transport system needs to be inclusive and accessible for all and that transport policy needs to recognise that people move around a city in a number of ways and at any given time and not just to commute to and from a place of work or school or childcare. The Five Cities Demand Management Study (2021) was noted in a number of submissions.

Submissions sought improved integration between public transport and active travel to ensure a safe environment and/or alternative routes for pedestrians and cyclists but also in regards to transport hubs, cycle parking facilities and provision to bring bikes onto public transport. Also noted, was the need to ensure a safe environment and/or alternative routes for pedestrians and cyclists in and around public transport projects. Increased provision of park and ride facilities was also noted in some submissions. Submissions noted that a multi-modal transport system for the city was needed, referencing apps which would link up public transport and micro-mobility provisions.

Chief Executive's Response

The support for improved public transport facilities is noted as well as the impact associated with delivering these and how these can be perceived as positive by some and negative by others. The need to safeguard existing public transport infrastructure is also noted. The CE recognises the importance of integrated transport and land use planning and the priority of delivering this has been emphasised within the Plan. Public transport projects brought forward by relevant transport authorities and as referenced within the Greater Dublin Area 2016 – 2035 and forthcoming review have been mapped on Map J to clearly show existing and proposed public transport options for Dublin City. The CE notes the reference in regards to Map J in regards to existing rail infrastructure within Dublin Port. While the rail line (orange) does extend to the Port area, it is noted that the green line overlays the orange and in the interest of clarity, this will be amended. The commitment by the Council to support efficient multi transport interchanges within the city is outlined in Policy SMT20 and to promote additional stations as part of DART+ is expressed in Objective SMT014.

The Plan clearly supports the delivery of improved public transport within the city and beyond and seeks to liaise with relevant stakeholders and facilitate the delivery of an improved public transport network. The importance of facilitating an integrated mobility strategy for the city is outlined within the Plan including the importance of linking up active modes with public transport facilities and to ensure that the delivery of public transport provision also creates safe and integrated network solutions for pedestrians and cyclists.

Chief Executive's Recommendation

Chapter 8

Section: 8.5 Policies and Objectives; Subsection 8.5.6 Sustainable Modes; Subheading Public Transport;

Page: 293, additional text at the end of 2nd paragraph on Page 293

Amendment:

The Council will continue to work with the NTA, the statutory authority responsible for long term strategic transport planning in the GDA, to focus on the delivery of additional and extended public transport routes to service newly developed and existing areas, to address gaps in existing areas, to improve access to public transport stops and services and to improve the integration between high density development and public transport nodes. **{The Council will seek to safeguard existing public transport infrastructure to ensure future resilience is maintained.}**

Chapter 8

Section: 8.5 Policies and Objectives; Subsection 8.5.6 Sustainable Modes; Subheading Public Transport;
Page: 295, Policy SMT20

Amendment:

Additional text to be added to Policy SMT20.

Policy SMT 20 Key Sustainable Transport Projects

To support the expeditious delivery of key sustainable transport project including Metrolink, Bus Connects, DART + and LUAS expansion programme so as to provide an integrated transport network with efficient interchange between transport modes, serving the existing and future needs of the city and region, {and to support the integration of existing public transport infrastructure with other transport modes.}

Chapter 8

Section: 8.5 Policies and Objectives; Subsection 8.5.6 Sustainable Modes; Subheading Public Transport;
Page: 295

Amendment:

Policy SMT21 The Rail Network and Freight Transport

1. To work with Iarnród Éireann/Irish Rail, the NTA, TII and other operators to progress a coordinated approach to improving the rail network, integrated with other public transport modes to ensure maximum public benefit and promoting sustainable transport and improved connectivity.
2. To facilitate {and support} the needs of freight transport in accordance with the NTA's Transport Strategy for the Greater Dublin Area 2016 – 2035 ~~(and forthcoming review)~~ {and its review} and {enhance the capacity on existing rail lines and services to provide improved facilities promoting the principles of sustainable transport to cater for the movement of freight by rail}.
3. {To support the outcomes of the Iarnród Éireann/Irish Rail Rail Freight 2040 Strategy}.

Volume 3; Development Plan Map set J

Extend the railway to the Port.

Micro-Mobility and Shared Mobility

Summary

Submissions support the inclusion of reference to micro mobility and shared mobility as an emerging mode of transport in recent years. Many submissions recognise the key role micro mobility can play in helping people move around the City. A number of submissions reference the need for an integrated app to help manage the shared mobility market. One submission suggests that Objective SMT018 should be expanded to specifically identify locations and a planned implementation programme for the expansion of shared bike and micro mobility

schemes. Another submission notes that shared micro mobility schemes must be managed to ensure that they do not impact negatively on pedestrian space and accessibility in the city. Similar concerns were raised in relation to e-scooters and their place within the public realm.

Chief Executive's Response

The Chief Executive welcomes the general support given in the submissions to shared and micro mobility schemes. It is not considered appropriate for the Draft Plan to specifically identify locations for the expansion of shared bike schemes or shared micro mobility schemes as these are operational challenges which will need to be addressed with regard to legal requirements, safety, public realm space management, parking and supportive infrastructure. By establishing the policy context in the Draft Plan to support the provision of these schemes, DCC is committed to working with the relevant providers and operators as this area of transport expands in the future. It is considered that the Draft Plan sufficiently addresses the concerns raised.

In relation to the development of an integrated app for the shared mobility market, DCC is supportive of Mobility as a Service (MaaS). Smart Dublin is an initiative of the Dublin Local Authorities which seeks to promote the Dublin region as a world leader in the development of smart city technologies. It is considered reasonable to add policy in support of the development of smart initiatives in this regard.

Chief Executive's Recommendation

Chapter 8

Section: 8.5.6 Sustainable Modes, Subheading Micro-mobility and Shared Mobility

Page: 296 - 297

Amendment:

Policy SMT22 Shared Mobility and Adaptive Infrastructure

To promote the use and expansion of shared mobility to all areas of the city and facilitate adaptive infrastructure for the changing modal transport environment, including other micro-mobility and shared mobility, as part of an integrated transport network in the city {, and to support and promote smart growth initiatives that develop new solutions to existing and future mobility services and support Smart Dublin in the development of a Mobility as a Service (MaaS) platform.}

Chapter 8

Section: 8.5.6 Sustainable Modes, Subheading Micro-mobility and Shared Mobility

Page: 296-297, insert next text at the end of the 5th Paragraph Page 296

“Enhanced monitoring and data analysis will enable Dublin City Council to identify and cater for demand areas, to better design and manage road space and to develop an adaptive infrastructure. {Dublin City Council will continue to support Smart Dublin, an initiative of the Dublin local authorities, which aims to promote the Dublin region as a world leader in the development of smart city technologies.}”

Section 8.5.8 Car Parking

Summary

A number of submissions support the various policies and objectives relating to car parking. In particular support relating to multi storey car parks and to the repurposing of surface parking throughout the city for greening initiatives and the reinstatement of a park at Leinster House has been received. A number of submissions seek the elimination of all free on street parking and surface parking in the city. Issues relating to illegal parking throughout the city and its impact on blocking cycle lanes and footpaths were also raised in a number of submissions.

A number of submissions raised issues relating to the provision of electric vehicle charging infrastructure with some submissions advocating that EV charging should be provided in multi storey car parks and not on non-residential streets, using kerbside space or impacting on pedestrian and cycling infrastructure. The submission from the Electricity Supply Board (ESB) welcomes the support for Electric Vehicles in the Draft Plan. Another submission sought clarity on a planned roll out of publicly available charging points, in particular, as a lot of private residents do not have private off street car parking spaces. A number of submissions raised issues around the car parking standards and flexibility around the application of the standards on developments. Submissions also noted that a better and more realistic plan for car parking in the suburban areas that actually references the reality of homeowner and renters is required.

Chief Executive's Response

The support in relation to the removal of surface car parking to improve greening opportunities throughout the city is noted and welcomed in principle by the CE. On street parking across the City performs a number of functions including operational kerbside activities as well being utilised by car share providers and, therefore, as outlined in Policy SMT23, a balance between all competing needs will be managed. Concerns around illegal parking interfering with pedestrians and cyclists are noted. This is an operational matter and outside of the scope of the Development Plan. However, Objective SMT021 seeks to review residential and non-residential parking provision within the lifetime of the Plan and implement parking demand measures where appropriate.

Submissions raised concern around the car parking standards and flexibility around the application of standards to places of works and planning applications already submitted prior to the adoption of the final plan. This will be discussed further in relation to Appendix 5.

Submissions relating to the approach to car parking in suburban areas is noted. The Parking Zones on Map J reflect an accessibility-based approach to car parking provision whereby more car parking is permissible in suburban areas, that is in Zone 3. Notwithstanding national guidance that promotes limited car parking for residential developments in certain circumstances, the development management process takes cognisance of the particular circumstances and receiving environments of new developments on a site by site basis including existing car parking situations.

In relation to the provision of EV charging, the CE welcomes the support for EV charging to be facilitated within multi storey car parks and notes the concern raised in some submissions about its provision on public streets that may impact on kerbside activity and pedestrian and cycling infrastructure. There are a wide range of policies and objectives in the Draft Plan supporting the development of mobility hubs and DCC sees the provision of EV charging as a key component of these hubs as well as within residential and non-residential developments. A Regional

Strategy for electric vehicle charging has been prepared for the four Dublin Local Authorities which addresses a range and type of charging facilities depending on location and associated use. DCC is not a service provider for EV charging and as such will not be providing public on street EV charging points. However, DCC will work with and support the relevant stakeholders to support the rollout of the Regional Strategy (Policies SMT2 and SMT27 refer). It is considered that the Draft Plan sufficiently addresses the concerns raised.

Chief Executive's Recommendation

No change is recommended to Chapter 8 as existing text satisfactorily responds to issues raised.

Section 8.5.9 Street/Road, Bridge and Tunnel Infrastructure

Summary

A number of submissions propose the addition of a wide range of feasibility studies to be carried out for various pedestrian and cycle connections across the city in addition to those already listed in the Draft Plan.

There are a number of submissions received including from the NTA and TII in relation to Policy SMT28 relating to the Southern Port Access Route (SPAR), with suggested revised wording to be included to reflect the NTA's Draft Transport Strategy for the Greater Dublin Area 2022-2042. A submission from Dublin Port Company also seeks to revise the wording of Policy SMT28 and outlines the importance of the SPAR to the development of the port's southern lands. The ESB in their submission supports the delivery of the SPAR.

TII in their submission also notes that the Dublin Eastern Bypass Corridor Protection Study Sector A: Dublin Tunnel to Sandymount Strand, 2014, continues to afford protection for the M50 Dublin Port South Access within the Eastern Bypass corridor until a decision is made on the preferred solution for the future M50 Dublin Port South Access Scheme. The Dublin Port Company in their submission recommend the inclusion of the Tolka Estuary Greenway which is referred to as Port Greenway in Chapter 13, as well as the Liffey-Tolka Public Realm Project along East Wall Road / Bond Road and future active travel measures within and around the Poolbeg Peninsula providing connections to the Great South Wall proposed by the Dublin Port Company.

A submission has requested the Eastern Bypass is retained in the Plan, and a suggestion to excavate more tunnels to facilitate the movement of the private car, bus and commercial vehicle transport is also noted. Other submissions made reference to trialling congestion charges whilst another sought for the East Link Toll to be removed. A number of submissions have identified additional pedestrian/cycle connections and bridges to be added to Objective SMT023. Localised improvements to existing roads and junctions have also been identified in a number of submissions.

Chief Executive's Response

It is noted that a number of submissions seek the inclusion of various pedestrian and cycle connections across the city to be added as objectives in the Draft Plan. While the spirit of the submissions to increase pedestrian and cycling connectivity in the city is noted and welcomed, it is not considered practicable to provide an exhaustive list of specific areas for consideration in the Draft Plan. Objective SMT08 notes that it is an objective of DCC to improve existing

cycleways and bicycle priority measures and cycle parking infrastructure throughout the city and villages and to support the routes planned in the NTA's Cycle Manual.

Support has been raised for a number of the projects detailed in Objective SMT023 and they seek for them to be progressed expeditiously within the lifetime of the Plan.

In relation to the inclusion of the projects outlined by the Dublin Port Company in their submission, while the CE is supportive in principle of such projects, these projects are subject to separate planning processes and delivered by a private developer. The list of projects detailed in Objective SMT023 are to be initiated by DCC and it is not considered appropriate to detail projects to be delivered in a private capacity.

The Eastern By Pass and provision for additional tunnel infrastructure are matters for consideration by the National Transport Authority for inclusion in the GDA Strategy and are beyond the scope of the Development Plan. It is acknowledged that the location of the SPAR as indicated in Map J can be amended for clarity based on the comments from TII. The introduction of congestion charging is a matter for national policy and has been reviewed as part of the Five Cities Demand Management Study which was undertaken on behalf of the Department of Transport. Localised improvements are an operational matter and are not considered appropriate to include in the list of strategic projects included in this section.

Chief Executive's Recommendation

Volume 3; Development Plan Map set J

Amend the alignment of the Southern Port Access Road (SPAR).

Section 8.5.10 Traffic Management and Road Safety Impacts

Summary

Overall there was support in the submissions for the policies and objectives set out in relation to traffic management and road safety. A number of submissions make suggestions for minor amendments in wording to various policies and objectives in relation to low traffic neighbourhoods, unsignalised crossings and 30kph zones. Specific operational suggestions were made in submissions in relation to existing traffic issues in various neighbourhoods for example through the implementation of trial homezones, changes to traffic signals or use of traffic cameras. One submission noted that the reference to DMURS should be updated to take account of the interim Covid-19 version.

Chief Executive's Response

A number of the submissions raised issues around operational matters that are outside of the scope of the Development Plan. It is considered that the spirit of the submissions where wording was suggested to be included or removed in various policies and objectives is still captured in the policies and objectives set out in the Development Plan and the Draft Plan sufficiently addresses the concerns raised.

Chief Executive's Recommendation

No change is recommended to Chapter 8 as existing text satisfactorily responds to issues raised.

Other Issues Raised

Matters raised in relation to the cost of public transport, traffic enforcement and the constraints, surface and access of existing carriageways, bridges and footpaths are not within the remit of the Development Plan to address.

Chapter 9: Sustainable Environmental Infrastructure and Flood Risk

Chapter 9: Sustainable Environmental Infrastructure and Flood Risk

Submission Number(s):

0005, 0006, 0594, 0609, 0814, 0815, 0888, 0890, 0949, 1025, 1028, 1048, 1075, 1083, 1137, 1159, 1191, 1207, 1238, 1305, 1353, 1386, 1406, 1421, 1448, 1457, 1472, 1477, 1480, 1553, 1673, 1698, 1704, 1732, 1733, 1735, 1749, 1784, 1786, 1799, 1811, 1812, 1834, 1843, 1848, 1849, 1850, 1851, 1853, 1961, 2087, 2120, 2126, 2129

Section 9.4 The Strategic Approach

Summary

A number of submissions deal with the delivery of infrastructure in the city. One submission seeks that density is more closely linked with supporting infrastructure while others call for greater infrastructural investment overall.

Irish Water confirms that the city's water supply will be adequate for the plan period with ongoing capital investment in water and wastewater infrastructure, and makes specific comments in respect to the Plan's Infrastructural Capacity Assessment.

Chief Executive's Response

The comments made by Irish Water, the Assembly and others on the Draft Plan's strategic approach are noted. The comments made by the Eastern Midland Regional Assembly (EMRA) are addressed in the CE response to their submission.

In relation to infrastructural capacity, Appendix 10 provides a full assessment of the larger scale infrastructure requirements for the city. The matter of linking planned growth and development with infrastructural capacity and investment is dealt with in Section 2 (Core Strategy) of this report. As highlighted in the Draft Plan, and in response to the EMRA and OPR submissions, all lands within the city area are serviced and whilst some capacity upgrades may be required, this is likely to be at a site-specific rather than a strategic level.

Chief Executive's Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Section 9.5 Policies and Objectives

Section 9.5.1 Water Supply and Wastewater

Summary

A number of submissions advocate for greater investment in the city's water supply and wastewater infrastructure, in order to ensure that housing targets can be met and existing capacity constraints addressed. One submission supports Irish Water's role as the responsible authority for delivering high quality and affordable water and waste water services, while another seeks that the Council drive the delivery of this investment.

The submission from Irish Water offers broad support for the Draft Plan and provides specific comments in respect to the status of the city's water supply, waste water infrastructure and management of the impact of planned road/ public realm projects on Irish Water assets/ projects.

Irish Water confirm that the city's water supply is adequate for the plan period 2022-2028, with the Water Supply Project remaining the preferred approach for securing supply in the longer-term. They also note that whilst the water supply network has no major issues at present, leakage reduction and/ or capital investment measures under the National Water Resources Plan will be required to maintain and improve levels of service as overall demand increases. The need for localised service improvements will continue to be assessed on a case-by-case basis as connection applications are submitted by developers, and Irish Water offer a commitment to work with the Council to resolve any local area issues in a timely manner.

Other submissions received which related to the city's water supply infrastructure generally supported the Draft Plan's water conservation policy approach. One submission sought an increased policy focus on water conservation in buildings and requested amendments be made to Objective SIO1 to reflect same, while another asked that greater consideration be given to how the supply of the city's current and future water requirements could potentially effect Natura 2000 sites.

Irish Water note that major upgrades to the city's wastewater treatment infrastructure at Ringsend are ongoing and that this investment, together with longer term projects planned for the Greater Dublin Area, will deliver the capacity to treat the city's wastewater on a phased basis, thereby, enabling future housing and commercial development whilst achieving compliance with EU legislation. In discussing the issue of localised wastewater system constraints, Irish Water confirm their support for the policy approach to removing/ significantly reducing surface water inflows into the city's combined sewer network and commend the plan's stormwater separation, run-off reduction, attenuation and SuDS policies.

In areas afflicted by a constrained combined network, Irish Water propose that effluent from new developments may have to be offset by storm separation elsewhere within the sub-catchment and that the Council could assist by identifying large impermeable public areas capable of serving such a purpose. They also recommend that Drainage Action Plans be used for wastewater networks/ as solutions for specific city sites that will be developer led/ financed, and call for the greater use of attenuation/ nature-based SuDS in new and existing development areas. Notwithstanding their general satisfaction with the Draft Plan, Irish Water state that they would welcome a policy direction to prohibit the discharge of additional surface water to combined sewers in order to maximise the capacity of existing foul water collection systems and they also request that amendments are made to Policy SI3 to achieve this.

Irish Water also looked specifically at the Strategic Development and Regeneration Areas (SDRAs) listed in the Draft Plan and provided specific commentary on each.

The city's existing wastewater infrastructure was also the subject of multiple other submissions which raised issues in respect to intense rainfall leading to drainage system overflows, the capacity of the Poolbeg Waste Water Treatment Plant and the need for an urgent upgrade to the city's sewerage disposal infrastructure. One submission welcomed Policy SI4 but suggested that the wording be amended to ensure it applied to both new and existing development. Specific concerns were also raised regarding uncontrolled sewerage discharges into Dublin Bay at Sandymount, Merrion and Monkstown, with one submission calling for the Council to use emergency response protocols to deal with the public health risk posed.

In respect of the potential for DCC public realm/ road projects to impact Irish Water assets/ projects, their submission requests that such development be in accordance with their Standard Details and Codes of Practice and subject to early engagement/ a diversion agreement where necessary to ensure minimal disruption to public water services.

Chief Executive's Response

The City Council welcomes Irish Water's support for the plan's water supply and wastewater policy and will endeavour to facilitate Irish Water in their role as the responsible authority for the provision and maintenance of an adequate public water supply and wastewater infrastructure. While decisions in respect to investment in critical water infrastructure and capital projects are outside the remit of the Council, Irish Water's commitment to working together to resolve strategic issues and ensure the timely provision of major infrastructural projects is welcomed.

The CE notes Irish Water's detailed comments on the Draft Plan's SDRAs and in response to this, and the OPR observations, it is proposed to include a new table of SDRAs in Chapter 13 (based on the original Table 2-8 in Chapter 2) and include a column that specifies relevant enabling infrastructure for each SDRA (see OPR Response for further details).

The CE welcomes Irish Water's support for the Draft Plan's proactive surface water management policies and notes that they are seeking to maximise the capacity of existing collection systems for foul water through the provision of additional catchment-based storm separation. In response to the amendment sought to Policy SI3 (Separation of Foul and Surface Water Drainage Systems) to prohibit the discharge of additional surface water to combined sewer, the CE is concerned that the practical implication of this prohibition would be to preclude development in large parts of Dublin city on the basis that it will rarely, if ever, be possible to infiltrate all surface water run-off and there will always be a small flow into the combined sewer. Furthermore, the CE also considers that such an action is unnecessary due to Irish Water's existing entitlement to prevent individual developers from connecting to the combined sewer network, a power which would allow Irish Water to achieve their stated objective to maximise the capacity of existing collection systems for foul water.

The CE notes Irish Water's comments on the potential for the Council to provide additional storm separation elsewhere in a sub-catchment area in the form of communal SuDS or other stormwater management schemes, in order to facilitate the development of individual sites within the catchment and offset system pressures arising from these new developments. Whilst the CE would fully support Irish Water leveraging fiscal or land resources from a developer for this kind of provision, this could only be done in partnership with the local authority (see also Objective SIO9).

The CE also notes Irish Water's request that Council public realm/ road projects which may impact Irish Water assets/ projects be subject to early consultation with them and carried out in accordance with their Standard Details and Codes of Practice. While this is an operational matter which is outside the scope of the Development Plan, the CE wishes to assure Irish Water that the Council will always strive for the highest standards in the delivery/ on-going maintenance of infrastructure and in projects to enhance the built environment.

In respect to the relationship between the city's water requirements and Natura 2000 sites, the city's current and future water supply arrangements are managed by Irish Water in accordance with Irish Water National Water Resources Plan – Framework Plan (2021). This plan was subject to full environmental assessment and it was determined that no adverse impacts on Natura 2000 sites were likely.

The CE is of the view that water conservation in buildings is sufficiently covered by existing Policy SI6 (Water Conservation) which requires all developments to incorporate best practice water conservation measures and, on this basis, the CE recommends that amendments to Objective SIO1 are not required.

In respect to concerns raised about the city's wastewater infrastructure/ the capacity of the wastewater treatment plant at Poolbeg, the CE notes that Irish Water confirm that major upgrades to this plant are underway and will support future housing and commercial development in the city. The issues raised in relation to drainage system overflows are noted and it is the view of the CE that they are already comprehensively addressed by the proactive policy approach set out in Section 9.5.4 and by Appendices 11, 12 and 13 of the Draft Plan.

Whilst the concerns raised in respect to uncontrolled wastewater discharges into Dublin Bay at a number of locations have been noted by the CE, the deployment of Council emergency response protocols is an operational matter which is outside the scope of the Development Plan.

In respect to the request to modify Policy SI4 (Drainage Infrastructure Design Standards) to enable it to apply to new and existing development, the CE wishes to clarify that Draft Plan policy cannot be applied retrospectively to proposals which have already received planning permission and/ or which have been constructed. In addition, the Draft Plan introduces a planning requirement that drainage in all developments shall be built to the highest standard and there is a mechanism available to the Council to require infrastructure to be upgraded to Code of Practice Standard prior to it being taken in charge.

Chief Executive's Recommendation:

No change is recommended as existing text in Draft Plan satisfactorily responds to issues raised in the submissions.

Section 9.5.2 Urban Watercourses and Water Quality

Summary

A number of submissions voice support for the policy approach to urban watercourses, water quality and river corridor restoration. One submission specifically welcomes the strong commitment to appropriately manage development within and adjacent to the Camac River Corridor while another seeks flexibility on the application of this policy in respect to a development site in Old Kilmainham. A submission received requested the inclusion of new policies/ objectives on the restoration of the River Dodder, while another draws attention to the importance of protecting the city's green and blue spaces and the wildlife within our waterways. A further submission calls for greater investment in culvert restoration and maintenance of underground/ partially underground rivers.

Chief Executive's Response

The Chief Executive notes the support for the policy approach to urban watercourses, river corridor restoration, water quality, wildlife within our waterways, and the protection of green/ blue spaces. The CE also commends the interest taken in the River Camac and River Dodder but considers that the application of Policy SI11 (Managing Development Within and Adjacent to Camac River Corridor) in respect to a specific development site is a development management matter which is outside the scope of the Development Plan. Following consideration of the requests made for greater investment in culvert restoration/ maintenance and for further policy

support for the restoration of the River Dodder, the CE is of the view that these matters are sufficiently addressed and/or supported in the Draft Plan under Policies SI8 and SI10 and Objectives SIO7-SIO9.

It is noted that since the publication of the Draft Plan, the Government's best practice guidance document, Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas (December 2021) has been published and the CE recommends the Draft is updated accordingly to refer to this new guidance document.

Chief Executive's Recommendation

Chapter: 9

Section: 9.5.2 Urban Watercourses and Water Quality

Page: 318, 3rd paragraph

The Council has a role to play in co-ordinating and tracking the implementation of {current, Draft and future 3rd cycle} RBMP measures at regional and local level, and in making sure they are fully considered throughout the physical planning process to ensure alignment between the Development Plan, WFD and RBMP. It is anticipated that forthcoming Section 28 Guidance on WFD Assessment and Sustainable Urban Drainage will assist planning authorities in addressing these water quality considerations as part of the planning and development decision-making process. {In the interim, regard will be had to the Government's best practice guidance document, Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas (December 2021)}.

Section 9.5.3 Flood Management

Summary

A detailed submission was made by the Office of Public Works (OPW) in their capacity as lead agency for flood risk management in Ireland. The points raised by the OPW in respect to flooding policies and objectives are dealt with in this section. Comments made by the OPW on the Draft Plan's Strategic Flood Risk Assessment and site-specific zoning are addressed by the CE in the SFRA and Volume 3 Sections of this report.

The OPW welcomes the discussion on climate change in the SFRA and highlights the importance of climate change impacts being considered at plan-making stage. It further advises that this can be realised by avoiding future development in areas potentially prone to flooding, by providing space for future flood defences and by setting specific development management objectives.

The OPW recommends that, in line with best practice, the SFRA should provide guidance on the likely applicability of different SuDS techniques for managing surface water run-off at key development sites and identify where integrated and area-based provision of SuDS/ green infrastructure would be appropriate in order to avoid reliance on individual site-by-site solutions. The Draft Plan's policy approach in this regard is commended (specifically Section 4.10 on Flood Mitigation Measures, Policies/ Objectives in Chapters 8, 9 and 10 and Appendices 11-13).

The OPW supports the policy approach to flood relief schemes and welcomes the inclusion of Policies SI17, SI18 and SI19, and Objective SIO10. In relation to coastal change and related flood risks, the OPW submission draws the Council's attention to the recent establishment by the Government of an Inter-Departmental Group on Coastal Change Management. This group is

tasked with developing a national coordinated/ integrated strategy to manage the projected impact of coastal change on coastal communities, economies, heritage, culture and environment and it is expected that they will bring forward proposals for consideration in the near future. The availability of more up-to-date information on coastal flood risk and flood hazard mapping is also flagged in the OPW submission and the correct source of information on CFRAM studies is clarified as being www.floodinfo.ie.

The relationship between climate change and flood risk is referenced in many of the other non-OPW submissions made in respect to flood risk management with greater public communication on climate change risks sought.

Other submissions take issue with the data the Council uses to assess flood risk, with one questioning its currency and another calling for the city's flood modelling to be verified by an external agency. A number of submissions make reference to projected sea level rise, coastal erosion and flooding arising from climate change, and seek the provision of greater coastal defences and controls on development in at risk areas. Concerns are raised in some submissions regarding the role/ future development of Poolbeg and the potential of this peninsula to be flooded due to climate change. The submission made by Dublin Port Company discusses how sea level rise in Dublin Bay will impact both the Port and the city, and sets out how they have been proactive in taking steps to plan for climate change adaptation by completing detailed studies on the impacts of sea level rise on the Great South Wall and on the North Bull Wall.

A number of submissions support the policy approach to natural/ nature-based flood risk management, with one submission seeking that hard infrastructure flood defences incorporate even greater measures for biodiversity/ wildlife restoration and enhancement.

Recognising that the Covid-19 pandemic has delayed planned commencement of flood defence projects, some submissions call for the Draft Plan and Irish Water to provide a commitment and timeline for the funding and urgent commencement of current proposals specifically the Sandymount, Clontarf Promenade and Poddle schemes.

The potential to combine the construction of the new Sandymount coastal flood defence scheme with the S2S cycle route/ improvements to cycle infrastructure along Strand Road is mentioned in a number of submissions.

Localised flooding issues are raised in multiple submissions and these are generally attributed to the impact of climate change, poor investment in/ maintenance of infrastructure and perceived overdevelopment. One submission notes that new development in Drimnagh has led to an increase in localised flooding while spot flooding in Sandymount arising from an overloaded local drainage system is noted in another. One submission raises concerns about the potential for the Grand Canal to flood and impact the operation of the Naas Road, and calls for measures to be put in place to manage this risk. In terms of local flooding arising from overflowing drainage systems, one submission calls for the Council to work with Irish Water to alleviate such risks. Another submission raises concerns regarding the maintenance of gullies and need for more regular street cleaning to avoid flooding.

Basement flood risk is also raised in a number of submissions which call for the Council to improve communication on, and support/ empower property owners to tackle, the issue.

Chief Executive's Response

Climate change risks have been considered as part of the plan's preparation and in terms of the requirements laid out in the SFRA in relation to development management for individual developments which all need to assess and propose mitigation of climate change risks from all flood sources. In response to the OPW's comments on the importance of considering climate change impacts at the Plan-making Stage, the CE recommends that the Draft Plan's flood management policies and objectives are amended to better reflect future flood risk arising from climate change. In addition, the CE confirms that all flood alleviation schemes incorporate an allowance for climate change impacts on fluvial or tidal flood levels as per National Guidelines.

In response to the OPW's comments on SuDS, the CE recommends that Objective SIO9 in Section 9.5.2 is amended to reflect the commitment of the Council to preparing a high level Surface Water Framework for the city.

The CE notes the OPW's request that mitigation measures/ restrictions specified in the SFRA are incorporated into Draft Plan as policies or objectives. The CE recommends that text of Draft Plan Policy SI14 (Strategic Flood Risk Assessment) is amended to respond to this request.

The Flood Zone map is based on the best available data at the time of preparing the SFRA and is considered appropriate for the spatial planning purposes for which it is used. Much of the Flood Zones are derived from flood alleviation scheme model outputs (see also Section 2.1 of SFRA). All data for each flood alleviation project is internally reviewed by the design consultant for the project and then approved by the Dublin City Council flood team and the Office of Public Works. The OPW are the National Competent Authority for flood schemes in the State.

There is no significant coastal erosion in Dublin City but there are examples of coastal accretion such as the continuous expansion of Bull Island. The future development of Poolbeg is fully addressed under the Poolbeg West Planning Scheme adopted in 2019 which is a separate statutory plan to the Dublin City Development Plan. The Planning Scheme was subject to a comprehensive SFRA. Both proposed and existing flood defences on the Poolbeg Peninsula and Dublin Port area take into account estimates of sea level rise and increased wave heights due to climate change. All coastal flood alleviation schemes incorporate climate change provisions into them. Sea level rise and wave heights are monitored in Dublin Bay on a continuous basis. Notwithstanding, the CE recommends that Section 9.5.3 of the Draft Plan is amended in response to the OPW submission to include reference to the Inter-Departmental Group on Coastal Change Management and new OPW studies of 2018 and 2021.

Nature-based solutions are the first option considered in any flood defence scheme. These have been used in many local pluvial (monster rain) and local flood schemes to date. For rivers, storage and environmental enhancements are considered at an early stage. Hard defences are considered to be a last resort and these are incorporated into existing garden or other existing walls or embankments as far as is reasonably possible. Restoration of watercourses where possible in an urban setting is also a high priority as per Section 9.5.2 of the Draft Plan.

Further to strategic flood projects raised, the Poddle scheme is awaiting planning permission from An Bord Pleanála whilst the Sandymount Promenade scheme is programmed to start construction later this year. Clontarf Promenade is programmed to have a multi-disciplinary team appointed later this year. It should be noted that large flood projects typically take 5-10 years to complete from inception to handover.

All flood alleviation schemes take into account all other projects in the area at concept/design or construction stage and, where feasible, a collaborative approach is taken.

Many of the local flooding issues raised in submissions are, in fact, operational matters which fall outside the remit of the Development Plan. Notwithstanding this, the City Council will continue to work closely with Irish Water and the OPW to reduce local flooding as far as reasonably possible. Similarly, while the maintenance of street and surface water networks is an operational matter, the Council's Drainage Department will endeavour to investigate all flooding complaints to establish their connection with drainage infrastructure.

Public information on flood risk and protection is made available on the City Council's website at <https://www.dublincity.ie/residential/environment/flood-and-water-framework-directive/flood-protection>. This information includes a 'Basement Flooding Leaflet' which explains how and why basements can flood and offers advice on how to best protect your property. Policy SI20 (Basement Flood Risk Management) and Appendix 9 (Basement Development Guidance) in the Draft Plan will also assist in managing and mitigating basement flood risk in the city.

Chief Executive's Recommendation

Chapter: 9

Section: 9.5.2 Urban Watercourses and Water Quality

Page: 322, Objective SIO9

Amendment:

Objective SIO9: Planning for ~~(Nature-based Water Management)~~ {Surface Water Management}

To undertake ~~(Rainwater)~~ {Surface Water} Management Plans for each river catchment and as part of this, include a study of relevant zoned lands within the city in order to ensure that sufficient land is provided for nature-based {surface} water management {, SuDS and green infrastructure}.

Amendment:

The Draft Plan SFRA mapping is to be updated to include flood maps overlaid on zoning maps. See CE Recommendation in Volume 7 for further details.

Chapter: 9

Section: 9.5.3 Flood Management

Page: 323, 6th paragraph

Amendment:

In 2013, the OPW published the Irish Coastal Protection Strategy Study (ICPSS) which provided strategic coastal flood and erosion hazard maps for the national coastline. {This was updated by the Irish Coastal Wave and Water Level Modelling Study (ICWWS) 2018, and the National Coastal Flood Hazard Mapping, 2021.} ~~(This)~~ {These} stud~~(y)~~{ies} ~~(has)~~ {have} informed local authority assessment of potential hazards associated with future development, ~~(has)~~ {have} guided decision making on local coastal planning and development, and ~~(has)~~ {have} facilitated the development of appropriate plans and strategies for the sustainable

management of coastlines. {Regard will also be had to the forthcoming recommendations of the Government's Inter-Departmental Group on Coastal Change Management.}

Chapter: 9

Section: 9.5.3 Flood Management

Page: 324, Policy SI13

Amendment:

Policy SI13 Minimising Flood Risk

To minimise the flood risk in Dublin City from all other sources of flooding as far as is practicable, including fluvial, {coastal,} reservoirs and dams, **(and)** the piped water system {and potential climate change impacts}.

Chapter: 9

Section: 9.5.3 Flood Management

Page: 324, Policy SI14

Amendment:

Policy SI14 Strategic Flood Risk Assessment

To implement and comply fully with the recommendations of the Strategic Flood Risk Assessment prepared as part of the Dublin City Development Plan 2022-2028, {including all measures to mitigate identified climate change and flood risks, including those recommended under Part 3 (Specific Flood Risk Assessment) of the Justification Tests,} and to have regard to the Flood Risk Management Guidelines (2009), as revised by Circular PL 2/2014, when assessing planning applications and in the preparation of statutory and non-statutory plans.

Chapter: 9

Section: 9.5.3 Flood Management

Page: 324, Policy SI15

Amendment:

Policy SI15 Site-Specific Flood Risk Assessment

All development proposals shall carry out, to an appropriate level of detail, a Site-Specific Flood Risk Assessment (SSFRA) that shall demonstrate compliance with:

- The Planning System and Flood Risk Management, Guidelines for Planning Authorities, Department of the Environment, Community and Local Government (2009), as revised by Circular PL 2/2014 {and any future amendments}, and the Strategic Flood Risk Assessment (SFRA) as prepared by this Development Plan.
- The application of the sequential approach, with avoidance of {highly and less vulnerable} development in areas at risk of flooding as a priority {and/ or the provision of water compatible development only}. Where the Justification Test for Plan Making and Development Management have been passed, the SSFRA will address all potential sources of flood risk and will consider residual risks including climate change {and those associated with existing flood defences}. The SSFRA will include site-specific mitigation

measures, flood-resilient design and construction, and any necessary management measures (the SFRA and Appendix B~~(4)~~ of the above mentioned national guidelines refer). Attention shall be given in the site-specific flood risk assessment to building design and creating a successful interface with the public realm through good design that addresses flood concerns but also maintains appealing functional streetscapes. {Allowances for climate change shall be included in the SSFRA.}

- {On lands where the Justification Test for Plan Making has been passed and where a small proportion of the land is at risk of flooding, the sequential approach to development will be applied, and development will be limited to Minor Development (Section 5.28 of the Planning System and Flood Risk Management). There will be a presumption against the granting of permission for highly or less vulnerable development which encroaches onto or results in the loss of the flood plain. Water compatible development only will be considered in such areas at risk of flooding.}

Chapter: 9

Section: 9.5.3 Flood Management

Page: 325, Policy SI16

Amendment:

Policy SI16 Site-Specific Flood Risk Assessment

Proposals which may be classed as ‘minor development’, for example, small-scale infill, extensions to houses and small-scale extensions to existing commercial and industrial enterprises in Flood Zone A or B, should be assessed in accordance with the Guidelines for Planning Authorities on the Planning System and Flood Risk Management and Technical Appendices (2009), as revised by Circular PL 2/2014, with specific reference to Section 5.28 and in relation to the specific requirements of the Strategic Flood Risk Assessment. {This will include an assessment of the impact of climate change and appropriate mitigation.} The policy shall be not to increase the risk of flooding to the development or to third party lands, and to ensure risk to the development is managed.

Chapter: 9

Section: 9.5.3 Flood Management

Page: 325, Policy SI18

Amendment:

Policy SI18 Protection of Flood Alleviation Infrastructure

To put in place adequate measures to protect the integrity of flood alleviation infrastructure in Dublin City and to ensure new developments or temporary removal of any flood alleviation asset does not increase flood risk, while ensuring that new flood alleviation infrastructure has due regard to nature conservation, natural assets, open space and amenity values~~(-)~~, as well as potential climate change impacts.

Chapter: 9

Section: 9.5.3 Flood Management

Page: 326, Policy SI19

Amendment:

Policy SI19 Provision and Upgrading of Flood Alleviation Assets

To facilitate the provision of new or the upgrading of existing flood alleviation assets where necessary and in particular, the implementation of proposed flood alleviation schemes, on the Santry, Camac, Dodder, Wad, Naniken, Mayne, Tolka and Poddle rivers as well as Clontarf Promenade, Sandymount, Liffey estuary and any other significant flood risk areas being progressed through the planning process during the lifetime of the 2022-2028 Dublin City Development Plan, with due regard to the protection of natural heritage, built heritage and visual amenities ~~(+)~~, as well as potential climate change impacts.

Chapter: 9

Section: 9.5.3 Flood Management

Page: 326, Policy SI21

Amendment:

Policy SI21 Managing Surface Water Flood Risk

To minimise flood risk arising from pluvial (surface water) flooding in the city by promoting the use of natural or nature-based flood risk management measures as a priority and by requiring the use of sustainable drainage systems (SuDS) to minimise and limit the extent of hard surfacing and paving, and requiring the use of sustainable drainage techniques, where appropriate, for new development or for extensions to existing developments, in order to reduce the potential impact of existing and predicted flooding risk and to deliver wider environmental and biodiversity benefits and climate adaption.

Chapter: 9

Section: 9.5.3 Flood Management

Page: 326, SIO12

Amendment:

Objective SIO12 OPW Catchment-Based Flood Risk

To work with the OPW in the development and implementation of catchment-based strategies for the management of flood risk – including those relating to storage, and conveyance ~~(+)~~ and climate adaption.

Section 9.5.4 Surface Water Management and Sustainable Drainage Systems (SuDS)

Summary

The commitment of the Draft Plan to proactive surface water management and sustainable drainage systems is welcomed in many submissions, with a single submission calling for SuDS and surface water management requirements to be assessed on a case-by-case basis – specifically in respect to the provision of green blue roofs (Policy SI23). Another submission welcomes the initiative of green blue roofs in new developments, but would like to see their implementation on existing industrial premises, schools, or homes with appropriate roof space.

Irish Water welcome the policy direction to prohibit the discharge of additional surface water to combined (foul and surface water) sewers in order to maximise the capacity of existing collection systems for foul water, a point which is echoed in other submissions which highlight local

drainage/ surface water management issues in areas such as Drimnagh. Submissions suggest that these issues can be addressed through a variety of measures including investment in unblocking drains, culvert restoration, the maintenance of underground rivers, moving away from hard landscaping and the conditioning of permeable planted surfaces in large developments, with Irish Water suggesting that designated public areas be used for SuDS.

A small number of submissions seek amendments to the contents of Section 9.5.4, with calls for enhanced references to permeable paving in Policies SI21 and SI24 and clarity sought on the distinction between the standards specified in Policy SI26.

The approach set out in the Draft Plan regarding SuDS, green infrastructure and nature-based solutions is welcomed and the OPR commends the inclusion of guidance on green/ blue roofs, sustainable drainage design and evaluation, and surface water management. The OPR requests that Policy SI22 is updated to include reference to the recently published DHLGH '*Nature Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, Water Sensitive Urban Design Best Practice Interim Guidance Document*' (November, 2021).

Chief Executive's Response

The comments regarding the importance of the Council encouraging proactive surface water management and sustainable drainage systems are welcomed and the CE can confirm that surface water management requirements will be assessed on a case-by-case basis through the development management process in accordance with the application of Policies SI22-SI25.

The Draft Plan commits to encouraging the sustainable use of available hydraulic capacity in combined sewers through the promotion of SuDS and other nature-based solutions, and the Council look forward to working with Irish Water on projects to separate impermeable areas from the combined network. The range of measures suggested for addressing local drainage issues is noted by the CE, however the majority of these are operational matters and outside the scope of the Development Plan. The submissions which support action in the form of culvert restoration; maintenance of underground rivers; moving away from hard landscaping; the conditioning of permeable planted surfaces in large developments; and the designation of public areas for SuDS are all noted and the CE is satisfied that each of these points is already sufficiently addressed in the policies and objectives set out in Draft Plan, in particular, in Sections 9.5.2 (Urban Watercourses and Water Quality) and 9.5.4 (Surface Water Management and Sustainable Drainage Systems (SuDS)).

The amendments/ clarifications sought in respect to Policies SI21, SI24 and SI26 are noted by the CE. It is considered that it is not necessary to include specific reference to permeable paving in Policies SI21 (Managing Surface Water Flood Risk) and SI24 (Control of Paving of Private Driveways / Vehicular Entrances / Grassed Areas) on the basis that the practical application of these policies through the development management process will limit the extent of hard surfacing and paving in favour of more permeable surfacing as desired. The CE wishes to clarify in relation to Policy SI26 (Taking in Charge of Private Drainage Infrastructure) that all new public and private surface water infrastructure is required to be constructed in accordance with the Greater Dublin Regional Code of Practice for Drainage Works standards – irrespective of whether or not they will be subject to a subsequent taking in charge request to the Council.

The Chief Executive concurs with the comments of the OPR and Policy SI22 and Appendix 12 will be updated accordingly.

Chief Executive's Recommendation

See CE recommendation and response to OPR submission.

Section 9.5.5 Waste Management and Circular Economy Practice

Summary

A significant number of wide-ranging submissions were made under the theme of waste management and circular economy practice, with a large proportion relating to domestic waste management/ collection matters and localised litter/ dumping issues.

The submission from the Waste Policy and Resource Efficiency Division of the Department of the Environment, Climate and Communications directs that the City Council consult directly with the Eastern Midlands Region Waste Management Planning Office.

It is suggested by the Eastern and Midland Regional Assembly that the plan would benefit from reference to the potential opportunities of the bio economy as supported by RPO 7.34 of the RSES.

The reduction of waste in line with the principles of the circular economy is a strong theme in the submissions, with one calling for greater local access to repair services and recycling facilities, while another calls for circular economy mapping for Dublin 8 and 12. One submission calls for a reduction in the scale of retail which Policy SI31 (Public Recycling Facilities in Large Retail Developments) applies to bring this policy in line with 15 minute city principles and Objective SIO14 (Local Recycling/Reuse Infrastructure). In terms of the city's waste to energy infrastructure, one submission raises a concern with the reference to "clean" energy from incineration.

Submissions make a number of suggestions in respect to waste management in the city, with calls for greater policy support for active source separation of waste streams, more accessible infrastructure such as bottle banks, point-of-use recycling, on-street, subterranean and mixed bins. Submissions also make the case for the improved cost management of waste services, with one noting that recycling should be operated on not-for-profit basis.

A small number of submissions seek additional policies on public domestic waste bins, the establishment of a multi-agency pest control team, and the conversion of a number of recycling/ waste management objectives (SIO14, SIO15, SIO16, SIO17, SIO18) to policies on the basis that they are all proven methods to improve waste management.

The management and prevention of food waste/ commercial food waste also emerges as an important theme in the submissions received, with suggested measures ranging from community composting to the introduction of zero waste policies for new commercial developments - particularly take-away and fast-food enterprises.

In terms of the city's waste collection arrangements, a number of submissions seek that they be re-municipalised with service responsibility returned to the Council. Many of the submissions raised various issues in relation to litter management – lack of public litter bins, poor waste collection arrangements and monitoring, street cleanliness concerns, litter blackspots including Phibsborough/ North Inner City, illegal dumping - with a number citing problems with the implementation of the city's Litter Management Plan.

A small number of submissions specifically concerned pest control/ control of dog fouling and called on the Council to take a more proactive policy and enforcement approach to dealing with these issues. One submission seeks that explicit reference is made to the issue of dog fouling in Policies SI31, SI32, SI35 and Objective SIO14.

Chief Executive's Response

A number of submissions support the approach to waste management set out in the Draft Plan and concur that this approach should be underpinned by circular economy practice.

The instruction from the Department of the Environment, Climate and Communications to consult directly with the with the Eastern Midlands Region Waste Management Planning Office is noted and the submission by the Regional Assembly requests that the plan reference the potential opportunities of the bioeconomy in line with RSES RPO 7.34. Please see CE response and recommendation with the regard to the submission by EMRA.

The CE notes the submissions received relating to the circular economy and the request for an increased focus on same. The concern raised in respect to the use of the term 'clean' energy in respect to incineration is also noted. As stated in Section 3.5.4, Chapter 9 and Chapter 15: Development Standards, the Draft Plan seeks to integrate a more sustainable approach to waste management based on circular economy principles. Furthermore, Policy CA22 (Circular Economy) seeks "to support the shift towards the circular economy approach as set out in 'a Waste Action Plan for a Circular Economy 2020 to 2025, Ireland's National Waste Policy, or as updated." On this basis, it is considered that this matter is adequately addressed in the Draft Plan. The CE recommends however, that the Draft Plan is updated to refer to the Draft Circular Economy Bill (2021) and the Whole of Government Circular Economy Strategy 2022-2023.

The CE also notes the calls for a reduction in the scale of retail to which Policy SI31 (Public Recycling Facilities in Large Retail Developments) would apply and having considered it further, is satisfied that it applies to an appropriate quantum of retail space – such as convenience retail provision at neighbourhood scale - to ensure that it is deliverable in development management terms.

In terms of measures to address food/ commercial food waste, it is considered that Policy SI29 (Segregated Storage and Collection of Waste Streams) and Objectives SIO18 (Community Food Waste Composting) and SIO15 (Waste Management Education) in the Draft Plan sufficiently address these points. Attention is particularly drawn to SIO15 in which the stated objective is to encourage waste management and education programmes such as the Council's MODOS initiative, which supports businesses to reduce their commercial waste generation.

The CE is of the opinion that many of the issues raised in the submissions under Section 9.5.5 - specifically those relating to waste collection and cost arrangements, illegal dumping, litter monitoring, deployment of public litter/ recycling bins, underground bins, local repair facilities, street cleaning, pest control and dog fouling - are operational matters which are outside the scope of the Development Plan. Similarly, whilst the Litter Management Plan is supported by Policy SI32 in the Draft Plan, its practical implementation is an operational issue which falls within the remit of the Council's Waste Management Department.

While the Chief Executive notes the submission which suggests that explicit reference to dog fouling be made Policies SI31, SI32, SI35 and Objective SIO14 together with the ones which call for circular economy mapping for Dublin 8 and 12 and take issue with the reference to clean energy, the Development Plan is a strategic policy document and not the correct or appropriate

policy tool to address such specific waste management issues. Notwithstanding this, the Draft Plan supports all circular opportunities in the city in line with Policy SI27 (Sustainable Waste Management).

In respect to the submissions which seek additional policies on public domestic waste bins and the conversion of a number of recycling/ waste management objectives to policies, it is considered that the Draft Plan policy approach adequately address the substantive issue raised.

Chief Executive's Recommendation

Please also see CE recommendation and response to EMRA submission.

Chapter: 9

Section: 9.5.5 Waste Management and Circular Economy Practice

Page: 329, 2nd paragraph

The Government's Waste Action Plan for a Circular Economy 2020-2025 provides Ireland with a roadmap for waste planning and management and is supported by the {Whole of Government Circular Economy Strategy 2022-2023 which provides a policy framework for Ireland's transition to a circular economy through new policies and practices. The Draft Circular Economy Bill was published in 2021.}. ~~(Government Strategy to comply with EU Waste Directive obligations).~~

Chapter: 9

Section: 9.5.5 Waste Management and Circular Economy Practice

Page: 330, 1st paragraph:

The {current} Eastern Midlands Regional Waste Management Plan 2015–2021 (EMRWMP) provides a strategic vision and framework for the prevention, reduction and management of waste in a safe and sustainable manner and the development plan is required to take account of the requirements of the plan. Waste streams are viewed as a valuable material resource and landfilling discouraged in favour of higher value waste recovery options, such as the generation of energy from municipal waste. The plan sets strong targets on waste prevention, re-use, recycling and segregation, all to be achieved through active enforcement of waste policy/ legislation and the promotion of reuse, repair and resource efficiency activities. ~~(The EMRWMP is under review with a new plan due to be published in 2022.)~~ {A National Waste Management Plan for a Circular Economy is due to be published in late 2022 and will replace the existing Regional Waste Management Plans.}

Section 9.5.7 Air Quality

Summary

A number of submissions, including that by the Dublin Port Company, deal with air quality and call for stricter policies, for the standards under the Air Quality Standards Regulations 2011 to be exceeded, for greater public information to be made available, for increased monitoring/ monitoring infrastructure and more localised air pollution data. Submissions point to the link between air quality and the burning of fossil fuels, tobacco, construction site dust and the management of traffic volumes, with some calling attention to nitrogen gas exceedances and forthcoming changes in WHO/ EU Guidelines for air quality. One submission seeks that policies and objectives in Section 9.5.7 make explicit reference to the collecting and publishing of real-

time air quality data, whilst another requests that conversion of a number of air quality objectives to policies.

Chief Executive's Response

The CE notes that the World Health Organisation (WHO) issued revised air quality guidelines in 2021. These are under consideration by the European Union (EU) in terms of formulating future clean air directives and closer alignment of the EU air quality standards with improving scientific knowledge. In respect to the request that standards under the Air Quality Standards Regulations 2011 be exceeded, it should be noted that the Development Plan cannot circumvent European and national legislation. In this regard, the CE notes that the Government's Draft National Clean Air Strategy was published in March 2022 and the Council await the forthcoming adoption of this strategy and its more ambitious air quality standards and targets.

The provision of increased localised air quality monitoring and monitoring infrastructure are operational issues which come under the remit of the Council's Air Quality Monitoring and Noise Control Unit and are not appropriate to a land use plan. Similarly, the scope/ nature of public information on air quality is a matter which would be most appropriately addressed by the Dublin Region Air Quality Plan 2021 which sets out the root causes of air pollution and measures to address exceedances.

The CE is of the view that the nature of the air quality policies in the Plan are sufficient and would direct that the Dublin Region Air Quality Plan 2021 is the more appropriate plan to consult for those looking for additional detail. The CE further considers that Draft Plan Objective SIO21 sufficiently deals with the collection of air quality data while Objective SIO22 commits to making real time air quality data to the public, and that the requested conversion of air quality objectives to policies is not required. In respect to nitrogen gas exceedances, the CE wishes to confirm that the Dublin Region Air Quality Plan 2021 - Air Quality Plan to improve Nitrogen Dioxide levels in Dublin Region is now complete and has been submitted to the Minister for the Environment, Climate and Communications and EU Commission.

Chief Executive's Recommendation

No change is recommended as existing text in Draft Plan satisfactorily responds to issues raised in the submissions.

Section 9.5.8 Noise Pollution

Summary

Many submissions voice support for the approach to noise pollution set out in the Draft Plan. Potential solutions proposed for managing noise levels within the city include bye-laws, traffic calming, use of low noise road surfaces and the designation/ preservation of further quiet areas in the form of green and blue spaces.

A number of submissions reference the importance of noise management in local areas such as Temple Bar and seek greater area-specific noise monitoring and enforcement against noise infringements. A number of submissions concern noise emanating from construction traffic and from industrial areas, with Dublin Port Company (DPC) supporting the preparation of a Dublin Port Noise Action Plan. Diageo Ireland seeks to ensure that noise sensitive uses in the vicinity of Z7 lands are sufficiently acoustically insulated so as not to give rise to noise complaints which may undermine the ability of these lands to deliver on their land use zoning objective.

A small number of submissions request amendments/ additions to Section 9.5.8 and its related mapped objectives. One submission seeks the conversion of a number of noise pollution objectives to policies with another calling for new policies/ objectives on noise mitigating road surfaces and preventing excessively loud motor vehicles in residential areas. A submission from the Dublin Airport Authority recommends the inclusion of Airport Noise Zone C contours on Zoning Maps B and C and seeks an amendment to Policy S140 to ensure the protection/ prevention of noise sensitive uses within this zone.

Chief Executive's Response

The support expressed for the Draft Plan is noted and the CE considers that the policies and objectives already included in Section 9.5.8 and elsewhere in the Draft Plan address many of the points raised and are not in need of further amendment.

Having considered the points made in relation to local noise monitoring, noise enforcement, loud motor vehicles and the technical specification of the city's road surfaces, it is considered that these are operational matters which do not fall within the remit of a land use plan.

The submissions concerning construction traffic and industrial noise are noted and it is considered that the Draft Plan already contains sufficient policies (SI35-SI38) to reduce and mitigate the adverse effects of noise pollution associated with compact growth and densification, the construction/ operation of development and the operation of transport infrastructure.

DPC's support for the preparation of a legal and policy framework governing the acoustic operation of Dublin Port is recognised and while this matter is outside the scope of the Development Plan, the CE would encourage the company to consult directly with the Council's Noise Control Unit in respect to their forthcoming preparation of the Dublin Agglomeration Environmental Noise Action Plan 2023-2028.

The submission by the DAA is noted and the CE recommends a textual amendment to Policy SI40 (Dublin Airport Noise Zones and other Noise Plans) to address their request to ensure the safety of aircraft operations.

Chief Executive's Recommendation

Chapter: 9

Section: 9.5.8 Noise Pollution

Page: 336, SI40

Amendment:

Policy SI40 Dublin Airport Noise Zones and other Noise Plans

To take account of the Dublin Airport Local Area Plan (2020) and Noise Action Plan for Dublin Airport 2019-2023 as part of the development management process in order to ~~(protect noise sensitive development)~~ {ensure the protection/ prevention of noise sensitive uses within this zone} whilst facilitating the continued operation of Dublin Airport; and to develop similar appropriate plans for areas adjacent to Dublin Port.

Section 9.5.9 Public and External Lighting

Summary

A small number of submissions are concerned with lighting/ lighting levels in the city and their impact on wellbeing/ pedestrian safety. One submission calls for greater policy support for human-scale lighting while another seeks a ban on multi-coloured façade lighting in favour of the exclusive use of warm white lighting.

Chief Executive's Response

In relation to lighting levels in the city, the Draft Plan's policies on public and external lighting seek to ensure that it is appropriately and sensitively designed in order to balance the requirement for adequate lighting with safety, amenity and environmental considerations. The points made in respect to a desire for human-scale lighting and the exclusive use of warm white lighting are noted. With respect to façade lighting, this type of lighting on buildings around the city is privately owned and maintained and therefore falls outside the remit of the Council (the exception to this being Council-owned buildings) or can be assessed and dealt with through the development management process (see Policy SI42). It is the CE's experience that combining the appropriate use of colour temperature light sources and lighting infrastructure of suitable scale, proportion and architecture, leads to a sense of intimacy in areas that supports 'human scale' lighting.

Chief Executive's Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Section 9.5.11 Digital Connectivity Infrastructure

Summary

A number of submissions, including that by the American Chamber of Commerce, commend the policy approach to digital connectivity infrastructure and the National Broadband Plan, and its role facilitating Dublin's competitiveness and the continuation of remote working practices. The commitment of the Draft Plan to supporting the expansion of digital infrastructure is welcomed and its role in supporting the development of local businesses is recognised. Other submissions, such as those from the Office of Public Works (OPW) and Electricity Supply Board (ESB), endorse the Plan's policies on telecoms and sharing/ co-location of assets such as masts, and call for their strong application through the development management process. The need for industry engagement is raised in a couple of submissions with the OPW offering to engage further with DCC on opportunities to optimise the provision of broadband/ telecommunications infrastructure on the sites which they manage.

Chief Executive's Response

The submissions endorsing the approach to digital connectivity infrastructure in the plan are noted and welcomed by the CE including the invitation for the Council to engage further with the OPW on opportunities to optimise infrastructure provision. The CE is committed to the proactive application of Policies SI45-SI48 through the development management process once the Draft Plan is adopted.

Chief Executive's Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Section 9.5.12 Energy Utilities

Summary

A number of submissions were made regarding the policy approach to energy utilities in the city which was generally supported. Many of these, including the submissions from Eirgrid, the Electricity Supply Board (ESB) and the American Chamber of Commerce, raised the importance of balancing the urgent need to increase electricity grid/ energy capacity with overall sustainability/ climate action goals. One submission called for an increased focus on energy conservation/ efficiency measures while another suggested that greater support be provided for local sustainable energy production.

The OPR welcomed the integration of climate actions as an overarching theme in the Draft Plan and in particular, policies relating to low carbon district heating, waste heating recovery and utilisation, and micro-renewable energy production.

The submission by Eirgrid welcomed the provisions of the Draft Plan regarding energy utilities but noted the need to provide greater reference to the role of electricity transmission grid infrastructure in meeting the challenges of climate change and energy. Planning for energy zones/ energy scenarios/ the development of the electricity transmission grid is critical for Eirgrid and on this basis, they request that greater guidance is provided on spatially suitable locations for larger energy generation and demand centres (i.e. data centres). They also requests that Section 9.5.12 is amended to include reference to Shaping our Electricity Future - A Roadmap to achieve our Renewable Ambition (2021), Eirgrid's plan to develop a safe, secure and reliable supply of electricity and enhanced electricity network. Eirgrid would like to see the Draft Plan increase its policy support for the efficient use/ development of the existing transmission grid network and make more explicit reference to electricity grid infrastructure/ connections through the addition of text to Policies SI51 and SI52. In respect to the undergrounding of energy utility infrastructure, Eirgrid raises an issue with the feasibility of Policy SI50 and requests a more flexible approach to its application (specifically in respect to SDRAs 3, 4 and 5).

The submission made by the ESB expresses support for the Draft Plan and highlights a number of strategic policy issues to be considered. These include the need to protect the long-term operational requirements of existing utilities infrastructure, in addition to future capacity for the development of both conventional and renewable energy infrastructure (including energy storage systems and landside developments for offshore wind). The ESB specifically support the designation of the Poolbeg Peninsula as a strategic sustainable infrastructure hub, recognising its potential role in providing for land side energy infrastructure. The ESB also offer support for sustainable transport modes, PVs, EVs, the Southern Port Access Route and new energy technologies - such as waste heat and offshore wind - and seek to ensure that their engineering centres in the city are appropriately zoned (see Volume 2 of this report for further details).

Other submissions seek that further infrastructural expansion on the Poolbeg Peninsula be reconsidered/ minimised to better reflect the areas' amenity value and flood risk potential, and proximity to the Dublin Bay Biosphere/ sensitive environments. A submission received supports the development of Poolbeg as a Strategic Energy Zone and would encourage the Council to consider this.

A single submission received seeks the introduction of a policy restricting the siting of any Liquefied Natural Gas (LNG) terminals within the Council's jurisdiction.

Chief Executive's Response

The CE welcomes the submissions made in respect to energy utilities and is aware of the importance of balancing the urgent need to increase electricity grid/ energy capacity with overall sustainability/ climate action goals – with Sections 3.5.3 and 9.5.12 offering strong policy support in this regard.

In terms of the points made on energy conservation/ efficiency and local sustainable energy production, it is considered that these matters are already sufficiently addressed under climate action policies CA5-CA7, CA11 and CA20.

The Chief Executive welcomes the submission from EirGrid which gives broad and general support to the Draft Plan regarding energy utilities. While the need to provide greater reference to the role of electricity transmission grid infrastructure in meeting the challenges of climate change and energy is noted, it is considered that Section 9.5.12 (Policy SI49 and Objective SIO28) already sufficiently address this point and amendments to the plan's climate action policy and Policies SI51 and SI52 are unwarranted. The CE notes Eirgrid's submission regarding Shaping our Electricity Future - A Roadmap to achieve our Renewable Ambition (2021) and will update Section 9.5.12 of the Draft Plan to reference this. Eirgrid's concerns with the feasibility of Policy SI50 are noted by the CE, however the Development Plan is a strategic policy document and cannot address all area or site specific concerns. In respect to the call for greater guidance on spatially suitable locations for energy centres, locational clarification is already provided in Chapter 14 land use zoning whereby such uses are permitted in principle in the Z7 Employment (Heavy Industry) zoning.

With regard to the suggestion to provide more guidance on spatially suitable locations for larger energy generation and demand centres, the development of the Poolbeg Peninsula as a Sustainable Energy and Infrastructure Hub is supported. Furthermore, policies climate action policies CA18, CA19 and CA21 provide strategic support in this regard.

The Chief Executive notes the support from the ESB and addresses the appropriate zoning of ESB engineering centres under Volume 2 of this report. It is considered that protection of the long-term operational requirements of existing utilities infrastructure and future capacity for the development of conventional/ renewable energy infrastructure are already dealt with under energy utility Policies SI49 (Support for Energy Utilities) and SI51 (Renewable Energy Use and Generation), together with climate action policies CA10-CA17. The CE recommends amendments to the Draft Plan to relate to security of electricity supply.

Submissions concerning the designation/ role of Poolbeg as a Strategic Energy Zone are noted and while the CE agrees that the Poolbeg Peninsula has an important role in supporting decarbonisation of the energy utilities sector and the operations of the national grid, and supports the development of the area as a Strategic Sustainable Infrastructure hub for the city, Regional Policy Objective (RPO) 7.35 of the RSES states that EMRA shall, in conjunction with local authorities, identify Strategic Energy Zones as areas suitable for larger energy generating projects. Policy CA19 supports this policy position.

The Chief Executive notes the submission requesting the introduction of a policy restricting the siting of any Liquefied Natural Gas (LNG) terminals within the jurisdiction of the Council. It is

considered that any such proposal is best addressed through the DM process, taking into account all of the environmental and climate action considerations that apply.

Chapter 9

Section: 9.5.12 Energy Utilities

Page: 341, 2nd and 3rd paragraphs:

Amendment:

Gas and electricity are the energy utilities which have traditionally heated and powered Dublin City, which is identified as a major energy demand centre. The development of low carbon, resilient, reliable and indigenous energy sources and networks is recognised as very important to supporting the social and economic development of ~~(the city)~~ {Dublin}, especially if ~~{the city}~~ {Dublin} is to fulfil its role as a digital connectivity hub which attracts high technology industries. Support for decentralised and indigenous energy sources such as the Dublin district heating project will have an important role to play in achieving this objective alongside small scale/ community investment in solar and other domestic scale renewables. {In the short to medium term, it is prudent that existing electricity generation capacity needs to be retained in order to ensure security of electricity supply. Any potential impact of large energy users will be assessed against this need.}

The Council will support energy utility providers in their efforts to {to deliver,} reinforce and strengthen existing ~~(utility infrastructure and)~~ {electricity and natural gas} transmission/ distribution ~~{grid infrastructure,} (networks)~~ {electricity interconnection and electricity storage in order to ensure security of electricity supply and support the growth of renewable electricity generation. The Council} will {also} support new infrastructure projects and technologies with particular emphasis on renewable, alternative and decentralised energy sources, and those which are less carbon intensive in line with the Electricity and Gas Networks Sector Climate Change Adaptation Plan (2019) {and Shaping our Electricity Future - A Roadmap to achieve our Renewable Ambition (2021)}.

Other

Summary

The Dublin Airport Authority recommend the inclusion of a new policy relating to Public Safety Zones.

Chief Executive's Response

The submission by the DAA is noted and the CE notes that public safety zones are already dealt with under Section 15.18.15 Airport Safety Zones.

Chief Executive's Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Chapter 10: Green Infrastructure and Recreation

Chapter 10: Green Infrastructure and Recreation

Submission Number(s):

0002, 0003, 0006, 0007, 0008, 0011, 0012, 0014, 0016, 0017, 0018, 0025, 0028, 0029, 0031, 0034, 0040, 0042, 0043, 0045, 0046, 0047, 0048, 0050, 0051, 0052, 0053, 0054, 0057, 0058, 0059, 0060, 0061, 0062, 0063, 0064, 0065, 0066, 0067, 0068, 0069, 0070, 0071, 0072, 0073, 0074, 0075, 0076, 0077, 0078, 0079, 0080, 0082, 0083, 0084, 0085, 0086, 0087, 0088, 0089, 0090, 0091, 0092, 0093, 0094, 0096, 0097, 0098, 0100, 0101, 0102, 0103, 0104, 0105, 0106, 0107, 0108, 0109, 0110, 0111, 0112, 0113, 0115, 0116, 0117, 0118, 0119, 0120, 0121, 0122, 0123, 0124, 0125, 0126, 0128, 0131, 0132, 0133, 0134, 0135, 0136, 0137, 0138, 0139, 0140, 0141, 0142, 0143, 0144, 0145, 0146, 0147, 0148, 0150, 0151, 0152, 0153, 0154, 0155, 0156, 0157, 0158, 0159, 0160, 0161, 0162, 0163, 0164, 0165, 0166, 0167, 0168, 0169, 0170, 0171, 0172, 0173, 0174, 0175, 0176, 0177, 0178, 0179, 0180, 0181, 0182, 0183, 0184, 0185, 0187, 0188, 0189, 0190, 0191, 0192, 0193, 0194, 0195, 0196, 0197, 0198, 0199, 0200, 0201, 0202, 0203, 0204, 0206, 0207, 0208, 0209, 0211, 0212, 0213, 0214, 0215, 0216, 0217, 0218, 0219, 0221, 0222, 0223, 0224, 0225, 0226, 0227, 0228, 0229, 0230, 0231, 0232, 0233, 0234, 0235, 0236, 0237, 0238, 0240, 0241, 0242, 0243, 0244, 0245, 0246, 0247, 0248, 0249, 0250, 0251, 0252, 0254, 0255, 0256, 0257, 0258, 0259, 0261, 0262, 0263, 0265, 0267, 0268, 0269, 0270, 0271, 0273, 0274, 0275, 0276, 0277, 0278, 0279, 0280, 0281, 0282, 0283, 0286, 0288, 0289, 0290, 0291, 0292, 0293, 0294, 0295, 0296, 0297, 0298, 0299, 0300, 0301, 0303, 0304, 0305, 0306, 0307, 0309, 0310, 0311, 0312, 0314, 0317, 0318, 0319, 0320, 0321, 0322, 0323, 0324, 0325, 0333, 0341, 0342, 0343, 0348, 0352, 0354, 0355, 0356, 0357, 0358, 0360, 0361, 0363, 0367, 0368, 0369, 0370, 0372, 0373, 0374, 0375, 0376, 0377, 0378, 0380, 0381, 0382, 0383, 0385, 0387, 0390, 0393, 0394, 0403, 0405, 0406, 0407, 0409, 0410, 0411, 0414, 0415, 0416, 0417, 0418, 0419, 0420, 0421, 0422, 0423, 0424, 0426, 0428, 0429, 0430, 0431, 0432, 0433, 0435, 0436, 0437, 0438, 0439, 0440, 0441, 0442, 0443, 0444, 0445, 0446, 0447, 0448, 0449, 0450, 0456, 0457, 0458, 0460, 0461, 0462, 0463, 0464, 0466, 0467, 0468, 0469, 0470, 0471, 0472, 0473, 0474, 0475, 0476, 0477, 0478, 0479, 0480, 0483, 0484, 0486, 0487, 0488, 0489, 0490, 0491, 0492, 0493, 0494, 0496, 0497, 0500, 0501, 0502, 0503, 0504, 0505, 0506, 0507, 0508, 0509, 0510, 0511, 0513, 0514, 0515, 0516, 0517, 0518, 0519, 0520, 0521, 0522, 0523, 0524, 0525, 0526, 0527, 0528, 0529, 0530, 0531, 0532, 0533, 0534, 0535, 0536, 0537, 0538, 0539, 0540, 0541, 0542, 0543, 0544, 0545, 0546, 0547, 0548, 0549, 0552, 0553, 0555, 0556, 0557, 0558, 0559, 0561, 0562, 0563, 0564, 0565, 0566, 0567, 0568, 0569, 0570, 0571, 0572, 0573, 0574, 0575, 0576, 0578, 0579, 0581, 0582, 0583, 0584, 0585, 0586, 0589, 0591, 0593, 0594, 0595, 0597, 0598, 0600, 0602, 0603, 0607, 0608, 0609, 0610, 0611, 0612, 0613, 0614, 0615, 0616, 0617, 0618, 0619, 0620, 0621, 0622, 0623, 0624, 0625, 0629, 0630, 0635, 0639, 0643, 0644, 0645, 0646, 0647, 0649, 0651, 0654, 0655, 0660, 0661, 0662, 0663, 0664, 0665, 0666, 0667, 0668, 0669, 0670, 0671, 0672, 0673, 0674, 0675, 0676, 0677, 0679, 0680, 0682, 0683, 0684, 0685, 0686, 0688, 0689, 0695, 0696, 0697, 0699, 0702, 0703, 0704, 0706, 0707, 0709, 0710, 0711, 0712, 0713, 0714, 0715, 0716, 0717, 0720, 0721, 0724, 0725, 0730, 0732, 0733, 0734, 0735, 0736, 0738, 0741, 0744, 0745, 0751, 0753, 0754, 0761, 0765, 0767, 0768, 0769, 0770, 0771, 0772, 0774, 0776, 0777, 0778, 0779, 0780, 0781, 0782, 0783, 0785, 0786, 0787, 0789, 0791, 0792, 0793, 0794, 0795, 0796, 0798, 0802, 0803, 0807, 0810, 0813, 0814, 0815, 0816, 0817, 0818, 0819, 0820, 0821, 0822, 0824, 0831, 0833, 0835, 0837, 0838, 0839, 0840, 0841, 0842, 0843, 0844, 0845, 0855, 0856, 0857, 0858, 0859, 0860, 0861, 0862, 0863, 0864, 0865, 0866, 0867, 0868, 0869, 0870, 0871, 0872, 0873, 0874, 0875, 0877, 0878, 0879, 0881, 0882, 0883, 0884, 0885, 0888, 0889, 0890, 0898, 0899, 0900, 0901, 0902, 0903, 0904, 0905, 0906, 0908, 0910, 0911, 0913, 0914, 0915, 0916, 0918, 0920, 0928, 0934, 0935, 0939, 0941, 0942, 0943, 0945, 0949, 0951, 0952, 0953, 0955, 0956, 0957, 0958, 0961, 0962, 0965, 0966, 0967, 0969, 0981, 0982, 0984, 0985, 0986, 0987, 0988, 0989, 0990, 0991, 0992, 0993, 0994, 0995, 0996, 0998, 0999, 1000, 1002, 1007, 1009, 1015, 1017, 1023, 1024, 1025, 1032,

1038, 1041, 1043, 1044, 1047, 1052, 1054, 1065, 1066, 1067, 1069, 1070, 1071, 1072, 1073, 1074, 1083, 1088, 1091, 1097, 1100, 1101, 1102, 1103, 1104, 1105, 1106, 1107, 1108, 1110, 1111, 1112, 1113, 1114, 1116, 1117, 1118, 1119, 1124, 1125, 1126, 1127, 1128, 1129, 1131, 1132, 1133, 1134, 1135, 1136, 1137, 1138, 1139, 1140, 1141, 1142, 1143, 1144, 1146, 1154, 1171, 1172, 1173, 1174, 1175, 1177, 1178, 1180, 1181, 1182, 1184, 1185, 1186, 1187, 1188, 1189, 1191, 1192, 1194, 1196, 1198, 1199, 1200, 1201, 1202, 1203, 1205, 1206, 1208, 1210, 1211, 1213, 1214, 1215, 1216, 1217, 1218, 1219, 1220, 1221, 1223, 1224, 1225, 1227, 1228, 1229, 1231, 1232, 1233, 1234, 1235, 1237, 1238, 1239, 1240, 1241, 1242, 1243, 1244, 1246, 1248, 1250, 1251, 1252, 1253, 1254, 1255, 1256, 1257, 1259, 1260, 1261, 1262, 1265, 1267, 1269, 1270, 1273, 1274, 1276, 1277, 1278, 1280, 1282, 1285, 1287, 1289, 1290, 1291, 1293, 1294, 1296, 1297, 1298, 1307, 1308, 1310, 1311, 1314, 1316, 1317, 1319, 1322, 1325, 1326, 1328, 1329, 1330, 1331, 1332, 1333, 1336, 1340, 1342, 1344, 1345, 1349, 1351, 1352, 1353, 1354, 1355, 1356, 1357, 1360, 1361, 1362, 1364, 1365, 1366, 1367, 1368, 1369, 1371, 1372, 1373, 1374, 1375, 1376, 1379, 1381, 1384, 1386, 1391, 1394, 1397, 1399, 1405, 1406, 1408, 1409, 1410, 1411, 1414, 1416, 1417, 1418, 1419, 1421, 1422, 1424, 1425, 1426, 1428, 1429, 1431, 1432, 1433, 1437, 1438, 1439, 1443, 1448, 1451, 1456, 1464, 1466, 1471, 1477, 1478, 1480, 1482, 1484, 1485, 1486, 1491, 1498, 1500, 1505, 1507, 1509, 1518, 1519, 1525, 1528, 1533, 1534, 1535, 1542, 1551, 1552, 1553, 1557, 1560, 1561, 1562, 1567, 1568, 1569, 1570, 1576, 1579, 1582, 1586, 1591, 1600, 1609, 1616, 1625, 1626, 1627, 1628, 1631, 1632, 1633, 1637, 1638, 1639, 1642, 1645, 1657, 1658, 1661, 1663, 1664, 1679, 1682, 1683, 1689, 1693, 1700, 1704, 1707, 1716, 1717, 1718, 1722, 1724, 1726, 1733, 1735, 1739, 1744, 1747, 1748, 1750, 1752, 1755, 1757, 1762, 1779, 1780, 1784, 1786, 1792, 1794, 1796, 1800, 1802, 1806, 1811, 1822, 1824, 1826, 1830, 1834, 1845, 1847, 1849, 1851, 1874, 1875, 1879, 1880, 1888, 1889, 1890, 1891, 1897, 1898, 1899, 1900, 1901, 1902, 1903, 1904, 1905, 1906, 1907, 1908, 1909, 1910, 1911, 1912, 1913, 1914, 1915, 1916, 1917, 1918, 1919, 1920, 1921, 1922, 1923, 1924, 1925, 1926, 1927, 1928, 1929, 1930, 1931, 1932, 1933, 1934, 1935, 1936, 1937, 1938, 1939, 1940, 1941, 1942, 1943, 1944, 1945, 1949, 1950, 1951, 1952, 1953, 1954, 1955, 1956, 1957, 1958, 1959, 1960, 1962, 1963, 1964, 1965, 1966, 1967, 1968, 1969, 1970, 1971, 1973, 1974, 1975, 1976, 1977, 1978, 1979, 1980, 1981, 1982, 1983, 1984, 1985, 1986, 1987, 1988, 1989, 1990, 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2062, 2064, 2072, 2077, 2079, 2080, 2081, 2085, 2087, 2088, 2101, 2107, 2108, 2113, 2118, 2119, 2120, 2121, 2129, 2139, 2144

Section 10.5.1 Green Infrastructure

Summary

Submissions generally support connected green infrastructure particularly where it supports sustainable mobility.

A submission seeks that Objective GIO2 Preparation of a Green Infrastructure Strategy for Dublin City, be amended with a commitment to provide 75 micro gardens across the city. This submission also seeks a 'green micro area zoned designation' to facilitate more community led greening and involvement. Submissions also call for civic amenities to be provided along green infrastructure networks such as lighting, benches and toilets.

Submissions seek that there is consultation / engagement with local communities in the development of the city's green infrastructure.

Submissions seek more urban greening in the city to make it a healthier and more attractive place to live and to support biodiversity. Urban greening is sought by way of more green spaces, on roads (e.g. Upper Drumcondra Road), green roofs, on and around buildings, pocket parks, more tree pits / street trees, green walls, greening of corridors / lanes / paths / parking / corners etc.

Submissions outline the importance of urban greening in lower socioeconomic areas. It is stated that the Plan should set out a level of greenery per resident or per hectare. A submission seeks that black and blue spots be greened. A submission points out that D8 Green Bridge Forum (formally Mapping Green Dublin) have identified possible initiatives that could increase greening in underserved areas.

Submissions seek Environmental Improvement Plans and more greening strategies (or updates to existing) to facilitate urban greening. A green strategy is called for in Phibsborough, Portobello, Harold's Cross and for all lands inside the Canals. It is stated that quantifiable targets for both additional green spaces and tree planting is required.

Submissions call for multi-functional open space with appropriate vegetation / planting, the avoidance / reduction of hard landscapes in green areas / around buildings / development sites (to be controlled by planning conditions), optimising accessibility and supporting biodiversity and carbon sequestration.

Policy GI8 Metropolitan Greenways and Objective GIO6 Metropolitan and Local Greenways are broadly supported and one submission notes that some of these projects have been long planned but have yet to be completed e.g. Royal Canal Greenway. Submissions seek that Ringsend be referenced in Objective GIO6; that the Phoenix Park is connected to the River Liffey and onwards to Waterstown Park in South Dublin County Council and that the River Liffey itself can be walked / cycled / accessed safely 24/7; that the Santry River Greenway and Dodder Walkway projects be progressed; that a greenway be established from Santry to Clontarf Community College via Albert College Park; that a greenway be established from the River Liffey to major parks / green areas onwards into Ballyfermot / Palmerstown and northside.

Chief Executive's Response

It is an objective of the Draft Plan to prepare a Green Infrastructure Strategy for Dublin City (Objective GIO2, page 359). It is anticipated that such a strategy will strengthen the city's existing spatial strategic network by enhancing and expanding its connectivity, multi-functionality and accessibility while addressing gaps in the network. The City Council will engage with local communities in the development of a green infrastructure strategy for the city.

Objective GIO2 states that such a strategy will include a newly developed set of green micro areas. It is considered that it would be premature to stipulate the number of micro areas in advance of a detailed analysis to be carried out as part of the preparation of the strategy.

Submissions received in respect of suggested 'micro area zone designations' are addressed within this CE Report in Chapter 14, under Section 14.7.9.

Where it is appropriate civic amenities are being provided and are planned to be provided in the city's green infrastructure network such as in public parks and lighting along cycle routes. The Green Infrastructure Strategy to be prepared for the city will further consider these issues.

In addition to the future Green Infrastructure Strategy for the city, the Draft Plan contains a number of policies / guidance documents to encourage / promote / provide urban greening. Policy GI5 Greening of Public Realm / Streets, seeks the integration of urban greening features into the existing public realm and into the design of public realm projects for streets. This policy also promotes the installation of living green walls throughout the city. Appendix 11: Technical Summary of Dublin City Council Green and Blue Roof Guide (2021) outlines new requirements for the provision of green roofs in the city. Appendix 12: Technical Summary of Dublin City Council Sustainable Drainage Design and Evaluation Guide (2021) sets out a nature-based water management approach in new development in the city. It is considered that Urban Greening is sufficiently addressed under the above referred policy and technical guidance documents.

Objective GIO3 Current and Future Greening Strategies, outlines support for those Green Strategies that have been prepared and are currently being implemented between the canals including the 'Liberties Green Strategy', the 'North East Inner City Greening Strategy' and the 'Stoneybatter Greening Strategy'. This objective also seeks to expand the preparation and implementation of greening strategies on key streets in the city area between the canals. Such strategies include quantifiable targets for green space and tree planting.

In addition, Table 2-15 in Chapter 2: Core Strategy, lists out those centres in the city where it is proposed to prepare Local Environmental Improvement Plans (LEIPs). In addition to the above strategies and plans, the Council will continue to lead / support public realm plans / environmental improvements throughout the city.

Policy GI3 Multi-functionality (GI) and GI24 Multi-Functionality (Parks) seeks to ensure the development of multifunctional green and civic space in the city. The policies states that such space should meet community needs, support biodiversity and promote active and passive recreation, flood and surface water management and biodiversity. Both policies outline the need to balance the multi-functionality of green space with the need to protect local habitats and the recreational function requirements of parks.

Proposed regional and local greenways for the city are outlined in Objective GIO6 Metropolitan and Local Greenways, page 359. The development of the Metropolitan Greenway Network connecting Dublin Bay to the wider region / Dublin Mountains is progressing through the city. The coastal, Dodder and Royal Canal Greenways are currently progressing to construction with other Metropolitan routes in differing stages of development. Objective GIO6 specifically supports the development of the inner Grand / Royal canal loop linking the two canals (and the Liffey) via the Phoenix Park. The preparation of a Green Infrastructure Strategy for the city will be an opportunity to develop an interconnected green infrastructure network for the city including the identification of potential greenways.

Chief Executive's Recommendation

No changes are recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Section 10.5.2 Biodiversity

Summary

Submissions state that there needs to be more emphasis on protecting / promoting biodiversity / habits (including from noise and pollution). It is also detailed that there is a need to increase

biodiversity in the city / the bay including in / along waterways, on institutional lands, and through increased connections – at the macro and at the local / site level. Submissions state that Dublin Bays' importance as a Special Area of Conservation (SAC) and Special Protection Area (SPA) needs to be emphasised promoted and protected. A submission states that the Plan offers no protection or restoration for habits and ecosystems and that the Plan does not consider the impact of the proposed coast road bypass on ecosystems.

There are concerns that wildlife is being lost in the city due to the impact of new development (including at Santry). One submission states that in view of the rate of species having been and continuing to be lost, that addressing nature conservation in the city needs to be addressed in an urgent, comprehensive and meaningful way. It is stated that addressing biodiversity as a single ill-conceived category is wrong. It is stated that vague terminology is used in the Plan and there is a lack of understanding especially references to increasing biodiversity, corridors and linkages. It is also submitted that the Plan fails to mention legally binding Natura 2000 designations or other national designations. Another submission states that in referencing Natura 2000 sites, it should be explained that Ireland has failed to create / protect these sites.

Submissions seek that: development should make provision for local biodiversity; that new development should enhance ecological features and provide links to the wider Green Infrastructure Network; hard infrastructure flood defences should provide mitigation measures for biodiversity/wildlife restoration and enhancement; more wildflower meadows are needed (references Trinity example); action plans are required to address biodiversity; the potential to create a bee highway should be investigated; private and semi-private space should be more environmentally friendly; buildings can also act as a unit for biodiversity; Objective GIO14 should be amended to list the types of enhancements that could take place in new nature reserves; the DCC Biodiversity Plan should be implemented in partnership with natural scientists; the Natural Capital Approach should be embedded in the overarching philosophy of the Draft Dublin City Development Plan; and green space should be kept safe from hard infrastructure / surfacing / cycle routes..

A submission states that the Plan contains no SEA or AA assessment of the 2021 Dublin City Council Biodiversity Action Plan.

In respect of birds, submissions are seeking that swifts in the city are protected and that best practice is adopted by local authorities when work / retrofit is being carried out on buildings where swifts are nesting. Submissions seek that a mandatory provision of discrete built in swift nestboxes / swift bricks be applied to developments (Mayo County Council policy referenced).

A number of submissions highlight that Brent Geese and Curlews feed at St. Anne's Park and St. John's / St. Paul's playing fields and on institutional lands, and that these areas need to be protected.

Another submission states that Brent Geese regularly feed in the fenced off areas of the velodrome at Eamon Ceannt Park. It is suggested that fencing off areas for wildlife feeding and nesting in other parks should be considered.

A submission from a sporting organisation states that the requirement that all proposals which fall inside, or within the zone of influence of potential disturbance effects of ex situ inland feeding sites for Special Conservation Interest (SCI) winter bird species of SPA's will be subject to an AA means, in effect, that any development work on a playing pitch or elsewhere within a sports ground designated as an inland feeding site will lose its exempted development rights which could impact unduly on a sporting club. The submission seeks that the location of these ex situ

sites should be identified in the Plan along with the basis for designation / related criteria and the implications of this designation for development and / or where this information is available.

A submission from the NPWS states that the Plan has not addressed the potential effects on Natura 2000 sites of supply of the current and future water requirements for the city and also has not addressed the potential effects of nitrogen dioxide levels on Natura 2000 sites.

Chief Executive's Response

The Draft Plan under policies GI9 (European Union Natura 2000 Sites) to GI15 (Biodiversity), pages 362 – 363, sets out a detailed and comprehensive set of policies to conserve, manage, protect and restore, as appropriate, those relevant species or habitat types listed in the Habitats and Birds Directives; flora and fauna protected under Irish legislation; international and national sites for nature conservation; local areas of ecological importance for protected species, and inlands and sea fisheries. Development proposals will be assessed against these policies and objectives.

Table 10-2 Protected Areas of International and National Importance page 361, identifies those habitats and sites that are protected by International and European and National legislation.

The main reference document outlining the Council's approach to biodiversity in the city is the 2021 Dublin City Biodiversity Action Plan. This Action Plan was subject to Strategic Environmental Assessment and Appropriate Assessment processes.

Both the Draft Plan and the Dublin City Biodiversity Action Plan 2021 acknowledge that wildlife is being lost in the city. The Dublin City Biodiversity Action Plan seeks to address biodiversity loss through targeted actions with measurable outcomes to maintain, restore and supplement nature in the city. It is to be implemented with a wide range of relevant stakeholders including the NPWS.

The Draft Development Plan seeks to provide opportunities to incorporate biodiversity improvements in new developments through, inter-alia, urban greening and the use of nature-based water management in new developments (Policy GI16) and to increase the percentage of restored and naturalised areas on public land in the city (Policy GI17). Policy GI18 seeks to minimise the impact of light and noise at environmentally sensitive locations. Policy GI14 seeks to maintain and strengthen the integrity of the city's ecological corridors and stepping stones which enable species to move through the city. It is anticipated that the preparation of a Green Infrastructure Strategy for the city will further support these policies. Further comment on Green Infrastructure and urban greening including nature-based water management, is set out in this report in Section 10.5.1

The plan making process for the 2022 City Development Plan is subject to Strategic Environmental Impact Assessment and Appropriate Assessment and, therefore, all objectives have been assessed. Any consenting procedure for new roads will also include environmental / appropriate assessment.

Dublin City Council is managing its grasslands in a way that is more wildlife and insect/bee friendly, including by developing wildflower meadows. This is in order to provide habitat and food for insects and pollinators, see Objective GIO10 All Ireland Pollinator Plan 2021 – 2025 page 364.

Dublin City Council uses natural and engineered solutions to address flood risk in the city.

Objective GIO14 states that it is an objective of the Council to work with the NPWS in the designation of new nature reserves and NHA's in the city and in the identification of opportunities for nature development. It is considered that this objective is sufficiently clear and does not require further elaboration on enhancement measures for nature development.

Both the Dublin City Biodiversity Action Plan 2021 and the Dublin City Climate Change Action Plan contain actions to ensure swift bricks or nesting sites are provided in all DCC building projects, new build or retrofits.

The Draft Plan recognises that there are a number of inland feeding sites (ex-situ sites) outside of designated sites used by protected birds in the city. Development proposals, within or adjacent these sites will be subject to screening for appropriate assessment, including exempted development proposals as screening for appropriate assessment extends to Section 5 declarations. The text set out in Section 10.5.2 of the Draft Plan on ex-situ sites does not change / alter this legislative requirement.

The Council has given a commitment under the Dublin City Biodiversity Action Plan 2021, (Action 2.8) to create a data base and to map the feeding and roosting sites of the Light bellied Brent Geese in the city to inform development. This study is currently ongoing. The Council has also given a commitment to prepare grassland management guidelines for the management of Brent Goose feeding sites on all lands in State and semi-state ownership, including public parks, schools, and other land.

Submissions received in respect of the Strategic Environmental Assessment and the Appropriate Assessment of the Draft Plan are addressed within this CE Report in under SEA/ AA / SFRA.

Chief Executive's Recommendation

No changes are recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Section 10.5.3 Landscape

Summary

The OPW submission states that it has plans to upgrade and expand visitor facilities and services in the Phoenix Park within the lifetime of the Development Plan. In respect of Objective GIO20 Liffey Valley & Phoenix Park, it states that it would like to see these proposals accommodated in the SAAO process. The OPW similarly outlines that it would welcome the opportunity to liaise with the city council on existing protected views and vistas and potential additions, in particular those which affect OPW managed buildings and sites.

Chief Executive's Response

The Chief Executive notes the OPW's submission. The Council will work with the OPW and other interested parties in the preparation of the SAAO for the Liffey Valley and Phoenix Park and on any study to be undertaken on views and prospects in the city.

Chief Executive's Recommendation

No changes are recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Section 10.5.4 Parks and Open Spaces

Summary

Submissions state that green spaces and recreational areas should be considered a priority in planning for the city. Submissions indicate that there is a deficiency in open space in the city, that open space is below EU average and that overdevelopment in the city has led to this, including in the city centre, the Liberties and the South West Inner City / D8 generally, the North East Inner City / Northside, Dublin 6 and 6W, Phibsborough, Drimnagh, Lower Kimmage, Mud Island area and Santry.

Submissions outline that more open space is required in the city, that more parks / plazas / parklets should be built and that existing green and blue spaces must be protected (including legal protections) / better managed / allow greater access especially for children / and include more programmed uses. A submission seeks that residents should not be more than 2 km from open space / natural heritage. Submissions state that parks should open at night-time (allowing more off-lead time); areas of industrial heritage could be turned into parks; green roofs should be made accessible to the public; there should be more pocket parks; that semi-public parks should be made public; that church grounds can function as pocket parks; and that the same open space area cannot be identified by multiple developers as satisfying their open space requirements. A submission seeks that there be a more localised (area by area) assessment of need for open space. Submissions state that green space should be multifunctional (but not at a cost to biodiversity). Submissions also call for more facilities in parks including benches and that historic water fountains be repaired.

Specifically, submissions seek that St. Anne's Park and St John's / Paul's playing fields should be legally protected; that a St. Anne's Park consultation forum be established between residents and DCC; the car park in the Omni Centre could function as an open space area in a reimagined Santry; that there should be a dog park in Finglas, that Brickfield Park (including changing rooms and tea room) should be upgraded, and that an audit of open space is required for Kimmage.

A submission seeks that all parks should have strategic management plans.

The OPW is seeking to engage with DCC in respect of the future of the National Botanic Gardens. A submission states that any proposal to expand car parking at the National Botanic Gardens would impact on the functioning and historic layout of the Gardens.

In relation to the Phoenix Park, the OPW similarly is seeking to engage with DCC on the park and environs in terms of its future upgrade / the expansion of visitor facilities and services. A submission seeks that there should be no through road in the Phoenix Park.

Submissions support Objective GIO28 Urban Farming and Food Production. Submissions seek an increase in community gardens and that DCC create a post to work with local communities to develop, advise and support community growing projects, community gardens and allotments. Submissions seek that community gardens be increased by 100% in the city and that any survey of underutilised open spaces be with a view to identifying areas suitable for allotments as well as community gardens.

Submissions support Objective GIO29 Scully's Field page 371 and seek that it becomes part of the Dodder network and that a wooded park is provided in the area. A submission states that several sequential Development Plans have set out objectives to develop Scully's Field as a park - yet nothing has happened. Submissions seek that consideration should be given to a defined-time study of the potential of Scully's Field as a playground and/or sporting facility with a pedestrian bridge linking to the opposite side of the parkland in DLRCC's administrative area.

Submissions support Objective GIO30 Fitzwilliam and Four Masters Park, page 371 and seek that they are open to the public including at night time.

A submission seeks that Policy GIO15 (Mount Bernard Park in Phibsborough) of the expiring City Development should be included in the next City Development Plan.

Chief Executive's Response

The city's parks and open spaces encompass a wide range of spaces including formal parks, green open space areas, grassed areas, woodlands and also church yards, allotments and civic spaces.

The Council's Parks Strategy, 2019 examines the city's parks / open space resources, facilities and services that are available to residents and visitors and how they can be improved. This included an analysis of total park area within the city and an assessment of accessibility at the local level.

The Council's Parks Strategy 2019 identifies park area of 3.64 ha per 1,000 population. In this regard, it is a policy goal of the Draft Plan that a city-wide range of 2.5 ha to 3.6 ha of parks per 1,000 population benchmark be maintained. The Parks Department assesses local open space provision / need as part of the assessment of planning applications for development.

Both the Parks Strategy and the Draft Plan acknowledges, however, that open space provision varies considerably at the local level where deficits have been identified, particularly in the city centre. Policy GI27 Addressing Public Open Space Deficits in Identified Areas, states that the Council will seek the provision of additional public open spaces in areas of deficiency as identified in the Dublin City Council Parks Strategy 2019 and as to be identified in the forthcoming public open space audit for the city centre (Objective GIO24 Public Open Space Audit).

According to Policy GI27, public open space deficits will be addressed namely, by securing open space as part of new development; the upgrading of existing Flagship Parks and Community Grade 1 & 2 Parks to better serve their communities; investigating opportunities for access to local schools and colleges; and the development of pocket parks/parklets.

Greening Strategies have been put in place to address deficiencies in open space in the Liberties, the North East Inner City, and in the city centre as part of the 'Heart of the City, Public Realm Masterplan for the City Core' 2016. To date, in the Liberties, new public parks have been developed at Bridgefoot Street Park (10,000 sq.m) and Weaver Park (4,000 sq. m.). Objective GIO3 Current and Future Greening Strategies, page 359, seeks to expand the preparation and implementation of urban greening strategies with particular focus on key streets between the canals.

It is considered that Policies G127 and Objective GIO3 sufficiently address the issue of open space deficiency raised.

The Council's Parks Strategy outlines actions for increased access to parks, improved parks visitor facilities, park programmes and park management. The establishment of a park's consultation forum with residents is an operational matter, outside the scope of the Development Plan.

Open space areas in the city are protected by the Land Use Zoning Objective Z9: to preserve, provide and improve recreational amenity, open space and ecosystem services – see Chapter 14 Land Use Zoning. Issues of land use are also addressed under Chapter 14: Land Use Zoning.

The Draft Plan outlines under the following policies and objectives, existing and proposed management plans for the city's parks - Objective GIO11 North Bull Island Management Plan and Nature Reserve Action Plan 2020 – 2025, page 364, GIO26 Management Plans, page 370 and GIO27 Phoenix Park Management Plan, page 370.

The Chief Executive notes the OPW's and others submissions on the National Botanic Gardens and Phoenix Park. The Council will engage with the OPW on its plans for those parks. The issue of a thoroughfare through the Phoenix Park is an operational matter for the Transportation Department / the OPW.

The Chief Executive considers that Objective GIO28 Urban Farming and Food Production, page 371, where it is an objective to double the provision of allotment space in the city and to carry out a survey to identify lands suitable for community gardens, adequately addresses the issue of future allotment and community garden provision in the city. It is considered that Objective GIO28 does not require amendment. The creation of posts / hiring staff is a management matter for the Parks Department.

The Chief Executive notes the submissions in respect of Objective GIO29 Scully's Field, and Objective GIO30 Fitzwilliam and Four Masters Park. The opening hours of parks is an operational issue for the Parks Department / land owners.

The Chief Executive agrees that current City Development Plan Objective GIO15 (Mount Bernard Park) should be carried forward into the next Development Plan.

Chief Executive's Recommendation

Section: 10.5.4 Parks and Open Spaces

Page: 371 Insert a new Objective after GIO30, subsequent numbering to be amended accordingly

Amendment:

{Objective GIO31 Mount Bernard Park

To seek to expand Mount Bernard Park northwards to the Royal Canal, with a bridge connecting with the Green Way}

Section 10.5.5 Rivers and Canals

Summary

Submissions seek that wildlife within and adjacent the city's waterways be protected and that the biodiversity of these corridors needs to be enhanced. A submission states otters are protected and are supposed to be able to travel between the mountains and the sea via river corridors.

Submissions state that the city's waterways should be usable civic space and an amenity. Submissions seek: the repurposing the Royal Canal to become an urban natural corridor with green spaces linked to wider community; the development of Phibsborough and Drimnagh as Canal villages; that public boating and transport and recreational use on the Liffey be provided for; that river banks etc. are accessible and that lapsed public rights of way along the canals and river banks are reinstated; that house boats and leisure activities on the water and water's edge be facilitated.

A submission outlines that the Plan needs to promote water quality to allow safe access to the water for swimming with other more ambitious projects to follow.

A submission seeks that development adjacent to waterways must be sensitive to its context.

Chief Executive's Response

The Chief Executive considers that the policies and objectives outlined in Chapter 10 adequately provide for the protection of wildlife within and adjacent the city's waterways. The following are examples of policies which address the issue of river (side) wildlife protection:

- Policy GI13 Areas of Ecological Importance for Protected Species
- Policy GI14 Ecological / Wildlife Corridors
- Policy GI15 Inland and Sea Fisheries
- Policy GI29 Protect Character of River Corridors
- Policy GI30 Maintain and Improve Connectivity of Freshwater and Estuarine Habitats / EU Birds and Habitats Directives

It is policy in the Draft Plan to develop linear parks, riverine access, walkways and cycleways and water focused recreational sporting and tourism amenities along the city's waterways – Policy GI32 Linear Parks and Recreational Use of Waterways Aspects, page 373. Policy GI32 also states that where lands along the waterways are in private ownership, it shall be policy in any development proposal to secure public access along the waterway. Policy QHSN44 in Chapter 5, page 190, of the Draft Plan states that it is Council policy to work with Waterways Ireland to identify appropriate locations for additional houseboat serviced mooring locations.

Policy GI33 River Liffey, page 374, states that it is Council policy to protect and enhance the River Liffey's civic, ecological, amenity, historical and cultural connections and to promote its development for amenity and recreational uses in and along the river and its development as a green corridor.

Water quality issues are addressed within this CE Report in Chapter 9, Section 9.5.2, page 318.

Policy GI31 Protect and Improve Ecological Status of Rivers under the EU Water Framework Directive, page 373, seeks to support the improvement of the ecological status of all rivers /

waterbodies in the city and those rivers identified in the River Basin Management Plan 2018-2021 as required under the EU Water Framework Directive.

Policy GI34 New Development and Public Open Space along River Corridors page 375, requires that new development in terms of siting and design responds to the character, importance and setting of the city's rivers.

Chief Executive's Recommendation

No changes are recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Section 10.5.6 The Coast and Dublin Bay UNESCO Biosphere

Summary

A submission calls for a designation of the Strand area on the south side as an official public recreation zone.

Submissions seek that facilities for sea swimming (hooks, bins, showers, water fountains) and more access to the sea (including by public transport) would provide a major recreational amenity for the city and its people. A submission proposes a new diving tower on the coast. A submission states that the Draft Plan does not give the Dublin Bay and the UNESCO designated Biosphere the prominence it warrants as the Biosphere is the jewel in the crown of the capital city. The Bay's importance as a UNESCO Biosphere, EU Special Area of Conservation and EU Conservation Area needs to be emphasised, promoted and protected. This submission is seeking a plan for the bay to provide for its protection, enhancement and management.

A submission states that dredging works in the bay have consequences for the topography of the beaches and foreshore and calls on DCC to have regard to this fact.

Submissions point out that additional Waste Water Treatment Plant facilities are required to serve the city. The current plant on the Poolbeg Peninsula is overloaded and this leads to uncontrolled discharges / pollution / odours into Dublin Bay. The submission states that DCC should liaise with Irish Water in this respect / provide engineering solutions to the known system failures / use Emergency Response protocols to deal with the public health risk. A submission states that there should be no access to Bull Island.

Chief Executive's Response

In relation to the call for the designation of the Strand area on the south side of the city as a public recreation zone, the Draft Plan under Section 10.5.6 recognises the multiplicity of functions carried out on the city's coastline and it identifies the coastline as an important asset for the city, underpinning many of the environmental, economic, recreational, cultural and tourism functions of the city. It is recognised that the future economic, tourism, recreational and energy resource potential of the coast will need to be balanced with the requirement to protect its natural heritage, water quality, attractions and residential areas and as such a specific designation such as a public recreation zone is not recommended. The Draft Plan sets out a number of policies and objectives under Section 10.5.6 to support the coast – Policies GI35 to GI39 and Objectives GIO35 to GIO39.

Policy CA29 in Chapter 3 Climate Action, page 118, states that it is Council policy that a new Coastal Zone Management Plan will be prepared for the city's coastline. This is to support coastal zone management measures for adapting to climate change which include restoration of degraded ecosystems, increased flood resilience, water quality improvement, habitat conservation and provision of amenities for the residents and visitors of Dublin city.

It is considered that the Draft Plan adequately elaborates that Dublin Bay and its hinterland is designated as a UNESCO Biosphere Reserve and the Draft Plan outlines the role of the Biosphere Reserve in Section 10.5.6 The Coast and Dublin Bay UNESCO Biosphere.

Policy GI37 Protection and Management of Dublin Bay, page 376, states that it is policy to ensure a co-ordinated approach to the protection and management of Dublin Bay with other State and Semi-State agencies through the Dublin Bay UNESCO Biosphere Partnership in line with its management plan for the development of the Bay and the Lima Action Plan of the UNESCO MAB World Network of Reserves. Policy GI39 Interpretation, Awareness and Public Engagement, page 376, seeks to increase public engagement and actions to conserve nature in line with the objectives of the UNESCO Biosphere Reserve. Objective GIO38 Dublin Bay UNESCO Biosphere Conservation and Research Strategy, page 377 seeks to support the Biosphere as an international centre of excellence for education, training and research and the implementation of the Biosphere Reserve Conservation and Research Strategy 2016 – 2020.

The Chief Executive notes the submission on dredging in Dublin Port. All dredging operations are subject to licencing processes which invite public submissions. Maintenance dredging can be exempt from the requirement for planning permission.

Submissions received on Waste Water Treatment Plant facilities are addressed within this CE Report within the section on Water Supply and Wastewater (Section 9.5.1, Chapter 9, page 315).

The Chief Executive notes the submission regarding access to Bull Island. Bull Island is part of the Dublin Bay Biosphere, and is one of the most highly designated biodiversity areas in the country. It is also a popular beach and walking area. The City's Park Strategy identifies the following actions in respect of Bull Island:

- To implement planned traffic management solutions for access to the island.
- To construct a new visitor centre subject to planning approval.

In this regard, it is not proposed to restrict access to Bull Island.

Chief Executive's Recommendation

No changes are recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Section 10.5.7 Urban Forest

Summary

Submissions seek the implementation and the progression of the aspirations of the Dublin City Tree Strategy 2016, or as to be updated, in order to protect / maintain / conserve existing trees and increase the tree canopy in the city. Generally, submissions seek that the Urban Tree

Canopy must be increased and the benefits of same need to be communicated to the wider public.

Submissions highlight that there is very low tree canopy cover in the city, particularly in the inner city, north city centre, south west inner city and D6 / D6W. It is stated that street trees are being lost and are not being replaced (e.g. Western Way) and that there are too many streets with no tree planting.

Submissions seek that Dublin City Council should promote urban forests and tree awareness in the community; increase the tree canopy cover to a minimum of 10% in the north inner city / city wide; increase tree canopy cover in Phibsborough / Stoneybatter / Smithfield; that DCC should plant / retrofit an additional 20,000 trees on the city's streets in areas deficient of trees; that trees should be planted on all roads in the city / Fortfield Terrace; a pocket forest is sought in D8; there should be intensive tree planting in new development sites; and that any suitable prunings or felled timber should be sold or otherwise made available for use as sustainable fuel. A submission also seeks a new policy to accelerate tree planting for carbon sequestration which will also provide fruit, nuts and timber.

Submissions state that DCC should aim to have far more extensive Tree Preservations Orders in place (only 3 in place currently) to prevent the loss of established trees. Submissions seek that the Tree Preservation Order process be clarified and streamlined.

A submission seeks that Policy GI41 Protect Existing Trees as Part of New Development, page 378, includes a presumption in favour of retention for all / mature trees.

Chief Executive's Response

The city's Parks Department is responsible for the implementation of the Dublin City Tree Strategy 2016. That department is preparing an updated Tree Strategy for the city which will be subject to a public consultation exercise. The forthcoming Tree Strategy will establish urban forestry plans for the city, provide a target for an increased level of tree cover and will prioritise locations for tree planting. The Tree Strategy will be subject to public consultation.

The Draft Development Plan acknowledges that there is low tree canopy cover in the inner city and it sets out detailed policies to rectify this.

Policy GI44 Resilient Urban Forest, page 378, states that it is Council policy to deliver and manage a resilient urban forest for the city to help increase resilience to the effects of climate change to consist of native and exotic trees and to target and prioritise locations in the city with a low canopy cover for an increased level of tree cover. Objective GIO42 Urban Tree Canopy Plan, page 379, states that it is an objective of the Council to support the preparation of an Urban Tree Canopy Plan for the City Centre area and to increase tree canopy cover to the minimum of 10% in all areas with an emphasis in increasing the canopy cover in areas where there is a deficit and a minimum of 5% each year in the city centre.

The implementation of greening strategies and public realm plans between the canals has and will continue to increase the tree canopy in the city centre.

The making of Tree Preservation Orders is provided for under Section 205 of the 2000 Planning Act, as amended. If it appears to the planning authority that it is expedient, in the interests of amenity or the environment, to make provision for the preservation of any tree, trees, group of trees or woodlands, it may make an order to protect the tree etc. This protection includes the

prohibition of cutting down, topping, lopping or wilful destruction of such trees and requires the owners to enter into an agreement on their proper management.

Development proposals normally must demonstrate the protection and incorporation of existing trees and landscape features worthy of retention into site design. Such applications would normally be supported by an Arboricultural Report. The Chief Executive acknowledges that it is not always feasible to retain all mature trees on a development site and in such cases a replanting scheme may be required. It is, therefore, considered that it would not be appropriate to amend Policy GI41 as requested.

Chief Executive's Recommendation

No changes are recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Section 10.5.8 Sport, Recreation and Play

Summary

Submissions outline that investment in sport infrastructure, recreational facilities, and outdoor pursuits is vital in terms of ensuring communities stay physically and mentally healthy.

Submissions state that there is a lack of sporting and recreational facilities including pitches in Dublin 8, Marrowbone Lane, Donore Avenue / St. Teresa's Gardens, the Liberties, Drimnagh, the South West Inner City, Dublin 6 and 6W, Broadstone and Mountjoy, and the inner city generally. Submissions emphasize that this impacts negatively on young people / results in people not staying involved in sport; and results in local clubs having to travel long distances to play sport. This situation has developed, according to submissions, due to a lack of sports infrastructure planning in the city and due to the Council allowing publicly owned former sport / recreational grounds to be leased by developers.

Submissions highlight that there has been significant growth in girls / women playing sports with as many girls playing at underage level as boys. Submissions note that existing facilities at clubs / facilities don't adequately serve women / girls. Submissions agree with a recent Council motion that there should be equal access and availability of playing pitches for men/boys and women/girls and that any future development of city centre parks should ensure that playing facilities for women and girls are properly safeguarded. Another submission seeks that sports facilities are gendered proofed.

Objective GIO45 Playing Fields Study, page 383 is generally well supported in submissions. Submissions state that pitches to serve the demand of field sports / team sports and the mixed sport community for GAA, soccer, rugby etc., are required. A submission indicates that any study must identify all requirements for playable pitches. Other submissions seek an objective that the Council liaises with TU Dublin and DCU so that pitches are open for the public at weekends.

Specifically, submissions seek that Herbert Park should be considered for a floodlit MUGA facility that would cater for local GAA and soccer clubs. Other clubs seek improvements to pitches and ancillary facilities that they are using and they are willing to pay for the upgrades. Submissions identify the former Jesuit Order headquarters in Milltown development and Scully's Field as offering opportunities for pitches.

A submission from a club states that being able to share school facilities would be a valuable step forward. Another submission highlights that school grounds are not able to facilitate GAA pitch requirements and that many schools in the city are private and schools generally don't want to share their facilities.

Submissions make the following specific comments in respect of the following sports / facilities: that a tennis and basketball area be provided at St. Teresa's Gardens / St. Catherine's School and that it be open to the public; that the Markievicz Leisure Centre should be relocated if required by the construction of the Metrolink; that the Sean MacDermott Swimming Pool be reopened; that the Clontarf Baths should have public access; that a temporary park and playing facilities be provided on Donore Avenue; that a calisthenics park / gym equipment is provided in every park / village; that well-lit walk ways and exercise areas be provided to help increase the physical activity of local communities. Submissions also seek a definition for sports facilities.

A submission seeks that Policy GI45 National Physical Activity Plan 2016, page 382 be amended to include a reference to incidental gentle and playful interventions and to substantially to increase access where need is proven to exist. A submission in respect of Objective GIO43 National Public Health Policy, page 383, states that the objective should be more specific and measurable to evaluate success and it seeks that the objective includes a set of indicators to measure health and well-being at the local level.

A submission seeks that Policy GI46 To Improve and Upgrade / Provide Access to Sports / Recreational Facilities, page 382, should refer to the need to provide safe equitable and inclusive access throughout the city and to any spaces capable of providing a pitch.

Submissions seek that Policy GI48 Multiple Use of Sports and Recreational Facilities, page 382, needs to be amended so that existing DCC sporting facilities / all new facilities are required / encouraged / incentivised to be multi-use. TU Dublin supports Policy GI48 and has stated that it will work with DCC on the Large-Scale Sports Infrastructure Fund (LSSIF).

Submissions on Policy GI49 Protection of Existing and Established Sport and Recreational Facilities, page 382, support this policy and seeks that it applies to all green sporting infrastructure. A submission states that where replacement is allowed that such would be the same in terms of quality, accessibility and close proximity to the original facility (in line with 15-minute city). Specifically, it is stated that DCC should carry out a study of its own facilities in DCC flat complexes (which are being mismanaged) before consideration is given to taking away other facilities. Submissions question the applicability of this policy to Inchicore Sports Centre and state the policy must be applied to Donore Avenue / Inchicore.

A submission on Policy GI50 Fenced Playing Pitches on Existing Open Space, page 383 is concerned that the policy means that no new all-weather pitches would be allowed. This, it is stated, would have significant implications for clubs. Submissions call for more all-weather pitches / sports walls in the city seek that the plan needs to have an unambiguous ambition to add all weather playing surfaces to support the city's sport. One submission calls for more all-weather pitches and sports walls as they are suitable for a number of field games – Gaelic, soccer, hurling etc.

Submissions on Policy GI51 Children Playing Facilities – General, page 383, seek to emphasise that children's play facilities should include formal, informal and incidental space including streets and green corners. Submissions call for safe spaces / facilities for teens and teen girls to hang out. Submissions state that regard must be had to the United Nations Convention on the Rights of the Child (UNCRC) Article 31: The Child's Right to Play.

Submissions state that Objective GIO49 Play Friendly Communities, does not go far enough and they seek that DCC commits to prioritising the development of play-friendly communities where some road space is reallocated to extend the urban realm in as many locations as possible with the assurance of safe and traffic calmed roads and streets.

Submissions on Policy GI52 Children's Playing Facilities in New Residential Developments page 383, seek that this policy extends to new development in the inner city; residential development which forms part of mixed-use development to emergency family accommodation; and to children with disabilities.

The Inland Waterways Association of Ireland Dublin submission states that it notes, in connection with Policy GI53 Public Rights of Way, that the Draft Development Plan commits the Council over the period of the Development Plan to protect the Rights of Way shown in Fig 10.5. The IWAI submission points out that some of the canal is blocked for public access (Harold's Cross Bridge to Griffith Bridge) and sections are subject to historic leases which would need to be revoked.

Another submission states that the Development Plan must make it clear that the ROW map does not constitute the full extent of existing or proposed public rights of way and that any public right of way which existed prior to the publication of this Plan should be considered as continuing to exist. It is stated that the Development Plan should also include a specific timeline and strategy around the proper updating of a 'Public Rights of Way' map. Finally, it is stated that these identified PROW should be targeted for restoration / that development proposals should demonstrate how they will enhance and support networks of connectivity and that the process to extinguish a right of way in Dublin should be made more rigorous.

Submissions seek more liaison between DCC and Sporting Organisations. A submission states that in the Liberties facilities are badly managed and are not meeting the needs of the community. Another submission seeks liaison between DCC and individual clubs, particularly in the D8 area. Similarly, it is stated that local sports clubs / local residents should be recognised and identified in the Development Plan as stakeholders in the context of park upgrades / new parks / management plans for same.

Submissions generally support the provision of a lido and other facilities to provide water sports as set out in Objective GIO53 Water Sports and Leisure Activities. Submissions state that a lido should be provided within the lifetime of the Plan. Other submissions state that it should be provided at George's Dock. A submission seeks that Docklands Oversight and Advisory Committee should have a role in bringing George's Dock forward for development. CHQ Docklands is seeking a new objective regarding George's Dock/water animation. A submission seeks that Objective GIO53 be extended to between the canals and underserved areas of the city.

A large number of submissions outline their support for Objective GIO55 Marrowbone Lane Depot, page 384. There are calls for the provision of playing pitches and green open space / sports and recreational facilities on the lands. Many of the submissions support a 2019 proposal for the lands.

Chief Executive's Response

The city's wide range of sporting and recreational facilities include those found in parks and open spaces, those located on private grounds including schools and colleges and in public and private recreational centres. Public facilities in parks provide for a range of sports including field

sports, all weather pitch and training facilities, running / athletics, basketball, tennis, golf courses/pitch and putt greens, bowls, boules, skateparks, table tennis, handball, fitness trails/outdoor gyms, cycling, sea-based water sports etc.

The City Council's Parks Strategy 2019, under Section 4.2, examines these resources, facilities and services, and how they can be improved, and identifies deficits in areas / provision. The Strategy sets out the Council's Parks policy and actions up to the year 2022. It is anticipated that a new parks strategy will be prepared for the city.

The City Council's Parks Strategy 2019 indicates there are in the order of 230 playing pitches set out in Dublin City Council's public parks and open spaces primarily for soccer and GAA. This does not take into account the pitches on private grounds, schools and colleges.

The Chief Executive acknowledges the need to evaluate the use and quality of playing fields in the city as a result of planned population growth, increased female participation in sport and the general increase in demand for playing pitches. It is in this regard that Objective GIO45 Playing Fields's Study, page 383, proposes that a playing fields study will be carried out city wide. The detail and scope of such a study has yet to be determined.

Specific comments made in respect of the Markievicz Leisure Centre and Sean Mac Dermott Swimming Pool and Clontarf Baths are outside the scope of the Development Plan, as they are project / operational matters for the Metroproject / the Council / the Parks Department or they relate to private lands, respectively. Submissions in respect of sports facilities to be provided at St. Teresa's Garden's / St. Catherine's School would be more appropriately submitted / made when a masterplan is prepared for these lands. Submissions in respect of the provision of temporary facilities at Donore Avenue is a matter for the Parks Department and is outside the scope of this Development Plan. The Parks Department has and continues to roll out gym equipment to the city's parks. The city council is continuing to develop / upgrade walkways in the city.

The additional text proposed to policy GI45 is not considered necessary as the policy is a broad policy which sufficiently expresses the need to increase access to participation in formal and informal sporting and recreational activity in line with national health policy. Similarly, the additional text proposed in respect of Objective GIO43 is not considered necessary as the objective relates to supporting the objectives of national health policy.

The additional text proposed to policy GI46 is not considered necessary as it is considered that the policy as drafted sufficiently communicates the principle of the need for the availability of and equal access to a range of recreational facilities in the city for all people.

A multiple use sports facility provides a wide range of sports and physical activities in one location / at one facility. Policy GI48 is worded to encourage the co-locating of different sports between providers, clubs and schools and colleges etc. and this wording is considered appropriate. The Chief Executive welcomes TU's statement to work with DCC on its proposed multiple use indoor sports facility.

Policy GI49 Protection of Existing and Established Sport and Recreational Facilities, page 382, seeks, first and foremost to protect all existing and established sport and recreational facilities, including pitches, in the city. In those exceptional circumstances where there is no long term need for the facility, it must be replaced by equivalent or better provision at a location accessible to the local community. It is considered that Objective Policy GI49 does not require amendment.

Policy GI50 Fenced Playing Pitches on Existing Open Space, page 383 seeks to ensure that open space areas which are normally used for a variety of formal and informal amenity purposes are generally not fenced off for field sports thereby preventing recreational use when matches are not being played. This policy, which reflects policy in the 2019 City Council's Parks Strategy, is considered reasonable. It is considered that Objective Policy GI50 does not require amendment.

The Draft Plan recognises, under Section 10.5.8 Sport, Recreation and Plan, page 381, that playing is the most important aspect of a child's daily life. Dublin City Council under its Play Strategy 'Pollinating Play!' 2020 – 2025 is committed to enabling local, accessible and inclusive opportunities to play for children and young people. The Dublin City Play Strategy 'Pollinating Play!' 2020 – 2025 is underpinned by the UNCRC Article 31; The Child's Right to Play. The Strategy advocates for a child-friendly and playful city where all children and young people (0-18) can enjoy and fully exercise their right to play and have child friendly physical activity. This includes playgrounds, youth focused spaces and opportunities for play friendly neighbourhoods and public realm. Policy GI51, Objective GIO48 Dublin City Play Strategy 'Pollinating Play!' 2020, and Objective GIO49 Play Friendly Communities, page 384, reflect the objectives of the City Council Play Strategy and it is considered that they do not require amendments.

The requirements for play infrastructure pertain to residential schemes in all parts of the city and to residential schemes which form part of mixed-use developments. Section 15.8.8 of Chapter 15 of the Draft Plan sets out the requirements for play infrastructure. Section 15.13.9 Hostels / Sheltered Accommodation / Family Hubs, states that Family Hubs shall provide appropriate high quality play spaces for children. Policy GI51 Children's Playing Facilities in New Residential Developments states that it is Council policy to provide playgrounds to an appropriate standard of amenity, safety, accessibility and to create safe and accessible places for socialising and informal play. It is considered that Policy GI51 does not require amendments.

The Public Right of Way shown on Figure 10-5 Public Rights of Way, page 385, comprise streets, public footpaths cycleways and towpaths where relevant. The Chief Executive recognises that not all of the Grand Canal Towpath is accessible, however, it is possible to walk along the Grand Canal via the public domain. For clarity it is considered that where reference is made in Chapter 10 to Public Rights of Way, that reference should also be made to the public domain. Further significant public rights of way are to be identified during the lifetime of the Development Plan. The additional text proposed to policy GI46 is not considered necessary as it is considered that the policy as drafted sufficiently communicates the principle of the need for the availability of and equal access to a range of recreational facilities in the city for all people.

A location for a lido has not been identified to date. The Docklands Water Animation Strategy outlines how the water amenities of the Docklands area are managed and used and how it is envisaged to further increase the use of these areas. In relation to George's Dock, it is considered that Objective GIO34, page 374, which addresses the Docklands Water Animation Strategy already provides a policy base for the future regeneration of George's Dock and a separate objective is not necessary. Policy GI32 Linear Parks and Recreational Use of Waterway Aspects, page 373, outlines draft policy for supporting water focused recreational amenities along the city's rivers.

The Chief Executive notes the support for Objective GIO55 Marrowbone Lane Depot which supports the development of council owned lands as a Recreational Area.

Chief Executive's Recommendation

Section: 10.5.8 Sport Recreation and Play

Page: 382, Add to Last Paragraph

Amendment:

Figure 10-5 identifies and maps the strategic Public Rights of Way (PROW) in the city. Many of these PROW incorporate / will incorporate Metropolitan Greenways for other public domain areas thereby promoting and enabling wider regional recreation and tourism objectives and also sustainable travel modes.

Section 10.5.8 Sport Recreation and Play

Tolka Park

Summary

In relation to Tolka Park, a large volume of submissions was received, mainly in the form of signed petitions. The main issues raised are that the current Z9 zoning (Amenity/ Open Space Lands/Green Network) should be retained and that this is consistent with Draft Development Plan Policy GI46 (to improve existing recreational facilities in the city for all ages and groups), page 382, and GI48, (to encourage co-location of services between sports providers etc.), page 382.

It is submitted that an increasing city population needs more playing pitches, as indicated in the City Parks Strategy 2019-2022. The City Council's plan for only one football pitch on the north side needs to be reversed given that Tolka Park is currently home to the Women's National League Champions, and to allow the women's game to grow. It is submitted that the Z9 zoning needs to be emphasised by the addition of text in Section 10.5.8 to maintain the Z9 zoning of Tolka Park in its entirety, given its close proximity to the city centre, and its location where many green spaces have been lost, in the north east inner city and to maintain the sporting history of this site.

Other submissions state that Tolka Park is an important asset and that rezoning (for residential etc.) would be selling our past and stealing our children's future. Tolka Park should remain as part of the community hub of Drumcondra.

A submission from St. Patricks Athletics FC Richmond Road is seeking a new policy to support the redevelopment of Richmond Park for sporting and recreational purposes, worded as follows; "To support the redevelopment of Richmond Park soccer stadium to provide enhanced sporting, recreational and community amenities and in this regard to celebrate the rich sporting history of this site".

Chief Executive's Response

By way of background, Dublin City Council acquired both Tolka Park and Dalymount Park in order to ensure that both clubs, which were struggling post-recession, could be retained in the city. The intention was to develop one municipal stadium capable of accommodating both football clubs. Given the strong heritage, including international matches associated with Dalymount, both clubs and DCC agreed that the new municipal stadium should be at Dalymount,

to be partly funded by the disposal of the Tolka Park grounds. However, more recently Shelbourne have indicated to the City Council that they are exploring options which will include plans to utilise Tolka Park for football/sports use.

Having regard to these circumstances and the zoning in the Draft Plan is for Z9: To preserve, provide and improve recreational amenity, open space and ecosystem services the Chief Executive is not recommending that the zoning of the site be changed to a residential/ mixed use zoning objective.

In relation to the submissions seeking additional text to ensure Tolka Park remains Z9, the Chief Executive is of the view that the zoning maps are specific objectives in their own right and it is not necessary to duplicate them with additional text, particularly given the number of policies already in the Draft Plan (see page 382-384). However, in this particular instance, it is recommended that existing objective G1051 (Dalymount Park) be expanded to include Tolka Park.

The Chief Executive notes the submission from St. Patrick's Athletic FC Richmond Road and its plans to redevelop the existing football stadium. It is similarly considered appropriate to include St. Patrick's Athletics FC Richmond Road under Objective GIO15 to supports its redevelopment.

Chief Executive's Recommendation

Section: 10.5.8 Sport, Recreation and Play

Objective GIO51 Dalymount Park

Page: 384

Amendment:

GIO51 Dalymount Park {Tolka Park and St. Patrick's Athletic FC Richmond Park}

To redevelop Dalymount Park, {Tolka Park and St. Patrick's Athletic FC Richmond Park soccer stadia} providing enhanced sporting, recreational and community amenities and as part of this development {plan} to celebrate the rich sporting history of {these sites}.

Retain Z9 Zoning at Tolka Park, (Zoning Maps).

Other Issues

Summary

A submission has been made in respect of dog fouling in Cabra.

Submissions seek: that the NTA develops and publishes Healthy City indicators; that the NTA publishes its ecological studies which form part of Bus Connects proposals; that Area Curators be provided at the local level to protect neighbourhood assets from built heritage to biodiversity; that an 'Art O'Neill Track' to the Dublin Mountains following the River Poddle be established.

Chief Executive's Response

It is considered that the above submissions fall outside the scope of the Development Plan.

Chief Executive's Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Chapter 11: Built Heritage and Archaeology

Chapter 11: Built Heritage and Archaeology

Submission Number(s):

0006, 0115, 0313, 0315, 0338, 0349, 0353, 0379, 0380, 0459, 0553, 0594, 0637, 0653, 0656, 0657, 0658, 0659, 0698, 0729, 0760, 0766, 0887, 0888, 0925, 0927, 0963, 1004, 1012, 1015, 1030, 1051, 1063, 1074, 1075, 1082, 1083, 1084, 1085, 1086, 1087, 1115, 1121, 1137, 1155, 1167, 1179, 1191, 1193, 1207, 1236, 1245, 1258, 1264, 1318, 1338, 1353, 1386, 1397, 1406, 1413, 1421, 1448, 1458, 1472, 1473, 1477, 1480, 1482, 1489, 1553, 1557, 1576, 1583, 1594, 1607, 1645, 1654, 1665, 1672, 1682, 1696, 1698, 1700, 1701, 1703, 1704, 1705, 1730, 1733, 1735, 1750, 1755, 1757, 1759, 1772, 1784, 1788, 1809, 1811, 1826, 1833, 1836, 1840, 1843, 1849, 1851, 1853, 1862, 1882, 1971, 1972, 1973, 2085, 2086, 2109, 2114, 2120, 2129, 2131, 2139

Executive Summary

There was a request for a change to the second bullet point in the Executive Summary on Built Heritage and Archaeology at page 17 of the Draft Plan from 'how to put in place national legislation to conserve, protect and enhance our built heritage and archaeology' to 'how to conserve, protect and enhance our built heritage and archaeology in accordance with national legislation and policies.'

Chief Executive's Response

This request is noted and a textual amendment is recommended.

Chief Executive's Recommendation

Executive Summary

Section: Chapter 11: Built Heritage and Archaeology

Page: 17

Amendment:

- ~~(how to put in place)~~ {the implementation of} national legislation to conserve, protect and enhance our {city's} built heritage and archaeology.

Section 11.3 Challenges

Summary

A number of submissions supported appropriate use for existing buildings and raised concern that various buildings in the city remain underutilised and vacant. There was a support for the protection of historic fabric with real everyday importance over monuments devoid of contemporary use or social value and a request that built heritage as defined within policy should be understood as infrastructure with the potential to provide for real social and environmental change within our urban fabric.

Chief Executive's Response

The rehabilitation and reuse of existing buildings is comprehensively addressed in the Draft Plan. In Chapter 11, Policy BHA 11 encourages the rehabilitation and suitable adaptive reuse of

existing older buildings, structures and features, which make a positive contribution to the character and appearance of the streetscape. Policy BHA 24, encourages the careful refurbishment of historic buildings for sustainable and economically valuable uses. Policy BHA25 addresses the retention of access to upper floors to protect and promote the use of upper floors. The proposed Architectural Conservation Areas (ACAs) to be prioritised under the Draft Plan will provide spatial protection for streetscapes, including areas of vernacular and more contemporary buildings that are of architectural interest collectively, as a group or ensemble of buildings. Therefore, it is considered that the issues raised are comprehensively addressed in the Draft Plan.

Chief Executive's Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Section 11.4 The Strategic Approach

Summary

There was a general support for Draft Plan policies promoting the reuse of redundant and underused heritage buildings and promoting active land management measures such as the Living City Initiative and the Living-Over-the-Shop scheme. Other submissions called for DCC to do more to ensure the planning system favours retention and where this is not possible, seeks the re-use of building materials.

A number of submissions requested strategic plans for protected market buildings at the Iveagh Markets and the Victorian Fruit and Vegetable Market.

The OPW would welcome the opportunity to engage in further discussions with the city council with regard to improvements for visitor experience and interpretation at a number of key historic sites within the Dublin City area and upgrading of heritage sites, such as Dublin Castle complex, St. Sepulchre's Palace Complex, Werburgh Street, Ship Street, Debtors Prison, Royal Hospital Kilmainham, Irish National War Memorial Gardens and Commemorative Bridge, Magazine Fort, Phoenix Park, Phoenix Park Visitors Centre, Collins Barracks, National Library of Ireland, Casino at Marino and Custom House.

Concerns were raised in relation to the impact of build-to-rent schemes, hotels and high-rise development on Dublin's heritage and on the streetscape.

The Department of Housing, Local Government and Heritage submit that where 'Zone of Archaeological Interest' is to be used in a specific technical sense in the Draft Plan, it should be clearly defined and used consistently. The term is not used in the context of the National Monuments Act and is not used in common archaeological parlance.

There was support for implementing policies that support high quality architecture and respect cultural identity and tradition.

It was submitted that a review of the Record of Protected should be carried out because the architectural and cultural merit of many protected structures is questionable in light of our strategic principles in relation to climate change. The issue of Protected Structures being exempt from enhanced thermal performance requirements (Part L) of the Building Regulations being not applicable to Protected Structures is a concern and is considered outdated and in need of

review. Another concern raised was that ‘protection’ of a structure is seen as a potential barrier to real and valuable adaptation.

One submission requested bullet point 7 (promote the reuse of redundant and underused heritage buildings, etc.) of The Strategic Approach be expanded upon to include the merger of records into one master list for cultural bodies to assist the reuse of redundant and underused heritage buildings, i.e. for use as film sets or as tourist attractions: Record of Protected Structures, Architectural Conservation Areas, National Inventory of Architectural Heritage, Buildings on Historic Maps, Buildings-at-Risk register of Protected Structures, Areas of Special Planning Control, Conservation Areas, Record of Monuments and Places, Register of Historic Monuments, Shipwreck Inventory of Ireland, Dublin City Archaeological Archive, OPW Heritage Sites and Assets.

Chief Executive’s Response

The support is noted and welcomed by the Chief Executive. The Draft Plan includes various policies which favour retention and reuse of existing older buildings including Policy BHA11. This policy also encourages the retention and/or reinstatement of original fabric such as windows, doors, shopfronts (including signage) and other important features. It is considered that the Draft Plan contains sufficient policy to provide for the intent of the submissions.

It is acknowledged that the historic markets have a key role to play in promoting the vitality of the City Centre and there are a number of policies and objectives in Chapter 12: Culture, including Objective CCUVO11 ‘To promote and facilitate the ongoing implementation of the City Markets Project centred around the Victorian Fruit and Vegetable Market on Mary’s Lane ...’, along with SDRA 13 for the Markets Area and Environs in Chapter 13. Objective CCUVO12 supports ‘a regenerated Iveagh market as a major visitor attraction and as a local amenity for the community and to ensure that regeneration proposals include an appropriate community/civic space.’

Dublin City Council acknowledges the important role of the OPW in relation to key, national heritage sites across the city. A new policy is recommended for cooperation between the City Council and the OPW in the improvement of the amenities and upgrading of these key heritage sites.

A significant challenge for the City is achieving a balance between providing for compact growth, appropriate densification and place-making that aligns with national and regional policies, while facilitating innovative new development that respects and enhances the natural and historical character of the city. Policies to enable a balanced approach are provided mainly in Chapter 4: Shape and Structure of the City, including policy on building height locations (SC16), building height (SC17), developing the city’s character (SC2), and principles for urban design and architecture (SC5). Building heights are identified as a key consideration in managing proposed new development within the historic core, including Georgian areas, the Liffey quays and the medieval centre. The concerns raised in a number of submissions regarding the impact of BTR are noted. This matter is comprehensively addressed under the response to the OPR and also under the CE responses for Chapter 5.

The Department of Housing, Local Government and Heritage request that the term ‘Zone of Archaeological Interest should be clearly defined within the plan and used consistently is noted a recommendation to amend all references to these is included.

The Draft Plan includes policies that support high quality architecture which respects cultural identity and tradition and the principles of the National Policy on Architecture, for example

through Policy BHA2 on the development of Protected Structures, Policy BHA7 on development in Architectural Conservation Areas and Policy BHA 24 on the reuse and rehabilitation of historic buildings.

The submissions regarding the exemption of Protected Structures from enhanced thermal performance requirements (Part L, Building Regulations) are noted. However, the historic building stock is particularly sensitive to the impact of certain retrofitting measures and special consideration must be given to ensure improvements to environmental performance and thermal upgrading are sensitively undertaken to minimise adverse impacts on the architectural character and special interest of historic structures. Furthermore, traditional building construction and materials perform differently to modern construction methods and materials, which must be understood and carefully assessed in considering proposals for retrofitting works to older buildings.

Notwithstanding such exemptions, and in the overall interest of promoting sustainability, the Chief Executive recognises the need to improve energy efficiency, provided that these measures do not harm or compromise the special interest of Protected Structures. Policy BHA21, Policy BHA22 and Policy BHA23 seek to achieve this aim and section 11.5.4 sets out the relevant guidance to owners. The DHLGH Advice Series on Energy Efficiency in Traditional Buildings (2010) provides a variety of options for the sensitive thermal upgrading and adaptation of traditional buildings to make them more resilient to climate change impacts to which can be considered on a case-by-case basis, noting that proposals to Protected Structures and/or structures located within an ACA may require planning permission.

The submission on point 7 (promote the reuse of redundant and underused heritage buildings, etc.) of The Strategic Approach is noted. It is also noted that a number of the resources referred to are already available online. The compilation of multiple data-sets across organisations is not a matter for the City Development Plan.

Chief Executive's Recommendation

To insert a new policy.

Amendment:

Chapter 11

Section: 11.5.6

Page: 427 insert new policy BHA34.

{BHA34 OPW Historic Sites

To co-operate with and facilitate the Office of Public Works to improve visitor experience/interpretation and upgrade key historic sites, including the Dublin Castle complex, St. Sepulchre's Palace complex, Werburgh Street/Ship Street, the Debtors Prison, Royal Hospital at Kilmainham, the Irish National War Memorial Gardens and Commemorative Bridge, Phoenix Park (including the Visitors Centre and Magazine Fort), Collins Barracks, National Library of Ireland, the Casino at Marino and The Custom House.}

Section 11.5.1 The Record of Protected Structures

Summary

Several submissions requested additions or amendments to the wording of Policy BHA2 Development of Protected Structures. These are addressed in section of the CE report regarding the RPS.

The Civic Trust requested an addition to Policy BHA2 stating 'Ensure the preservation of historic windows, glass and doors, and the accurate replication of original dimensions and profiles where reinstatement/ restoration is necessary. Generic proprietary/ catalogue editions will not be supported.'

Inchicore Regeneration Consultative Forum support Policy BHA 2, especially point e) and h) that support the integrity of Richmond Barracks and Goldenbridge Cemetery.

A request was submitted that holy wells, sacred sites and sites of folklore be added to part (h) of Policy BHA2

The Irish Georgian Society request Policy BHA2: Development of Protected Structures c) be changed to 'ensure that works are carried out in line with best conservation practice as advised by a suitably qualified person with expertise in architectural conservation' as members have reported that as the word 'supervision' implies that conservation professionals should be present on site at all times when works are being carried out; this has resulted in concerns regarding compliance with planning permission.

One submission requested an amendment to Policy BHA3 Loss of Protected Structures to ensure planning permission shall not be granted for the demolition of a protected structure without a) public consultation b) rigorous examination and interrogation of the demolition proposal by a specific heritage expert, body or bodies.

Several submissions requested changes to Policy BHA5 Demolition of Regional Rated Building on NIAH and Policy BHA 6 Buildings on Historic Maps. Concerns were raised that taking a blanket approach to protecting structures with no assessment or consultation and without the prescribed provisions of the Act in relation to repair, reinstatement, development rights etc. is acting outside legislation and is directly contrary to the statutory requirements of Part IV of the Act.

Diageo request that Policy BHA5- Demolition of Regional Rated Building on NIAH and Policy BHA6- Buildings on Historic Maps are expanded to provide for a wider range of circumstances in which permission can be granted for the demolition of buildings on the NIAH or Historic maps including; when the loss of the building is required to deliver key infrastructure or a masterplan; when the condition of the building or structure has deteriorated and is no longer safe; and when the building or structure is impeding the delivery of a needed residential or commercial development. In all cases justification for the loss should be provided to the Council's satisfaction. Should the above recommendations not be accepted, Diageo ask Dublin City Council to include the following wording in Draft Policy BHA5 and BHA6, to resist the loss of such buildings 'in all but exceptional circumstances'.

It was also requested that the City Council consider updating the year in Policy BHA6- Buildings on Historic Maps from which structures appear on historic maps to up to and including 1847.

The Liberties Cultural Association supported referencing the National Inventory of Architectural Heritage (NIAH) rating of a structure and any associated Ministerial Recommendation in the assessment of planning application and welcome the proposed addition of structures on the NIAH to be added to the RPS.

The Irish Georgian Society support Objective BHAO1 Buildings-at-Risk register and request the public availability of the City Council's BAR register. Another submission requested that Objective BHAO1 become a policy.

The Land Development Agency recommend that text be inserted confirming a commitment to undertake an updated appraisal of the proposed Protected Structures at the CIE Works during the Development Plan period which may necessitate amendments to the RPS.

The Irish Georgian Society welcomes the inclusion of policies for the retention and re-use of historic buildings including buildings of heritage importance, which are not protected. However, the Society notes that the Draft Development Plan does not include a section regarding the potential for relaxation of Development Plan standards in the case of protected structures and other historic buildings (e.g. such as section 14.5 'relaxation of zoning objectives in Protected Structures) in the current Development Plan. The Society requests a similar section be included in Chapter 11 or Chapter 16 to help those wishing to pursue the conservation and sustainable reuse of historic buildings as part of appropriate projects.

There were numerous submissions expressing concern about derelict Protected Structures in the City. Several submissions requested the historically important Moore Street and Iveagh markets are conserved and restored. It was requested that Dublin City Councillors and the Executive Management team in charge of the city develop a working proposal in conjunction with the local community of the Liberties to bring the Iveagh Markets back into public ownership of the City of Dublin and apply for funds from central government to restore and redevelop the Iveagh Markets to a fully working public amenity. One submission seeks an objective to restore Aldborough House on Portland Row be included in the Dublin City Development Plan. Several submissions also request that Aldborough House be used as a community facility or educational facility. A number of submissions requested Baggot Street Hospital to be retained as a Protected Structures and there was support for its restoration and continued use as a public amenity.

A number of submissions requested the register of protected structures be expanded, greater powers for Councils to protect historic buildings and the application of existing powers more stringently. Some submissions expressed concern that the inclusion of a structure on the Record of Protected Structures can lead to it not being maintained, often due to cost. It was requested that special fire regulations be drawn up for the conversion of protected and older buildings.

Several submissions raised concern in relation to inadequate enforcement of unauthorised development to Protected Structures in Dublin City Council.

The LDA submit that it is crucial that in accommodating proposals within a comprehensive regeneration scheme, such as St. Brigid's Military Hospital, innovative and flexible approaches to the re-use and integration of these structures alongside sympathetically sited and designed new building are encouraged and embraced in a similar manner to other schemes across the city, including Clancy Quay. Dublin Port Company comment that the North Wall Quay extension forms part of the operational port and proposals required to facilitate access to southern port lands are likely to necessitate infrastructure interventions on the North Wall Quay extension. They request that such proposals are dealt with in a pragmatic manner. There was a submission

that the buildings at John Players, SCR must be protected from the major impact of the Hines development. (DCC-C38-Draft-728).

One submission requested that Dublin City Council establishes a successor to the City Recovery Task Force, with personnel drawn from relevant Council departments, including the Conservation section and Dublin Fire Brigade.

Chief Executive's Response

The various requests for amendments to and additional text to be included in Policy BHA2 to protect the architectural fabric and details of Protected Structures is considered by the Chief Executive to be substantially addressed by in the existing text of Policy BHA2 (a), (b) and (f) of the Draft Plan. The Architectural Heritage Protection Guidelines for Planning Authorities (2011) referred to in BHA2 (a) provide detailed, national guidance in relation to conservation best practice and the protection of both internal and external architectural features of Protected Structures.

Regarding the request that 'holy wells, sacred sites and sites of folklore' are added to part h) of Policy BHA2, the Chief Executive notes that many holy wells, sacred sites and sites of folklore of folklore are also archaeological monuments which are protected under the National Monuments Acts. Part IV of the Planning and Development Act, 2000 (as amended), requires Dublin City Council to include in its RPS every structure which, in its opinion, is of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest. Though holy wells, sacred sites and sites of folklore may be considered for addition to the RPS, the Architectural Heritage Protection Guidelines for Planning Authorities (2011) states that 'Care must be taken to ensure that there is sufficient physical fabric to such places for them to be defined as 'structures'' (p.30).

The Irish Georgian Society's request that Policy BHA2 Development of Protected Structures be amended at point (c) is noted and textual amendment to Policy BHA2 (c) recommended.

In relation to the request to amend Policy BHA3 Loss of Protected Structures, the Chief Executive considers that the removal of 'exceptional circumstances' from the policy would dilute this policy. Therefore, no change is recommended to this policy.

Concerns in relation to Policy BHA5 Demolition of Regional Rated Building on NIAH and Policy BHA 6 Buildings on Historic Maps are noted. The Chief Executive considers, however, that a 'presumption' against the demolition or substantial loss of such structures does not equate to 'blanket protection'.

Regarding Policy BHA6, it is noted that the policy in the Draft Plan provides for a presumption against the demolition or substantial loss of any buildings or other structure which appears on historic maps up to and including the Ordnance Survey of Dublin City, 1847.

The request by the Land Development Agency that a commitment to undertake an updated appraisal of the proposed Protected Structures at the CIE Works during the implementation period of the Development Plan is noted. Dublin City Council will consider all submissions and observations received during the Draft Plan public display stage, regarding the structures in the CIE Works area proposed for addition to the RPS, including those of the Land Development Agency, before making a decision as to whether one or more or all of the proposed additions should be made to the RPS.

Regarding the submissions from the LDA on St. Bricin's Military Hospital, the Chief Executive notes that any future regeneration of these lands will be the subject of an application for planning permission, which will be assessed on its merits through the development management process, having regard to the relevant material considerations, including the provisions of the Dublin City Development Plan at that time.

The comments from Dublin Port Company with regard to the proposed protection of the North Wall Quay extension are noted. Dublin City Council fully supports and recognises the nationally significant role of Dublin Port and the need to maintain and improve port related facilities. Proposals for significant alterations to existing port infrastructure and those for new infrastructure, will be the subject of an application for planning permission, which will be assessed on its merits in the development management process, having regard to the relevant material considerations, including the provisions of the Dublin City Development Plan at that time.

The Draft Plan provides support for the conservation and restoration of the historically important Iveagh Markets in Objective CCUVO12. Support for markets across the city, including the proposed redevelopment of the Victorian Fruit & Vegetable Market, a regenerated Iveagh Market and the Moore Street Market is provided in Chapter 7, section 7.5.6 and Policy CCUV33 'Support for Markets' of the Draft Plan.

It is acknowledged that Aldborough House is an important Protected Structure in need of restoration. It is in private ownership. Funding of recently completed external restoration works was provided under Stream 1 of the Historic Structures Fund 2021, with co-funding by the property owner. Guiding Principles for the future potential of Aldborough House are provided under No. 12 of SDRA 10 – North East Inner City.

Proposed additions/deletions to the RPS are progressed by the Conservation Section according to a methodology based on the Architectural Heritage Protection Guidelines for Planning Authorities (2011) and the statutory recommendations of the Minister/National Inventory of Architectural Heritage (NIAH). This methodology specifically prioritises 20th century structures, industrial structures, early buildings and under-represented building typologies.

The Draft Plan provides policies and objectives supporting the adaptation and re-use of derelict Protected Structures; this includes Objective BHA01 on the Buildings-at-Risk Register. Dublin City Council proactively manages a register of Protected Structures that are considered to be 'at risk of endangerment', i.e. those that 'are endangered or have the potential to become endangered through neglect, decay, damage or harm'; per Section 59 of the Planning and Development Act, 2000 (as amended). The Conservation Section liaises with the Planning Enforcement, Derelict Sites and Dangerous Buildings Sections of the City Council in order to prevent endangerment and to address endangerment where it has been identified.

Where enforcement notices are served in relation to 'buildings-at-risk' and/or where complaints are made to the Planning Enforcement Section, limited details of the case on the Planning Enforcement Register are available to view in person at the Planning Department's public counter. The information available is limited for data protection purposes and given that these matters may be subject of legal proceedings.

The support of the Irish Georgian Society for policies on the retention and re-use of historic buildings including buildings, which are not protected, is welcomed. Section 14.4 of the Draft Plan is similar to section 14.5 of the current Dublin City Development Plan 2016-2022, in that it provides that 'Dublin City Council actively encourages uses that are compatible with the

character of protected structures. In certain limited cases, and to ensure the long-term viability of a protected structure, it may be appropriate not to stringently apply city-wide zoning restrictions including site development standards, provided the protected structure is being restored to the highest standard; the special interest, character and setting of the building is protected; and the use and development is consistent with conservation policies and the proper planning and sustainable development of the area'.

Matters raised in relation to legislative powers, fire safety regulations, current enforcement operations and any successor to the City Recovery Taskforce are not relevant to the functions of the City Development Plan.

The City Council's Conservation Section administer and supervise national grant schemes that are available to owners of Protected Structures and of buildings in Architectural Conservation Areas (ACAs). The Built Heritage Investment Scheme (BHIS) supports small-scale conservation projects and the employment of skilled and experienced conservation professionals, craftspeople and tradespersons in the repair of historic structures. The Historic Structures Fund (HSF), which has a number of funding streams, is primarily intended for larger restoration projects.

Most Protected Structures are adapted and modified appropriately through the development management (planning application) process. All applications for development to Protected Structures are assessed having regard to the provisions of Development Plan, the Planning and Development Act, 2000 (as amended) and Government policies and guidelines; including the Architectural Heritage Protection Guidelines for Planning Authorities (2011); see also Policy BHA2 of the Draft Plan (p. 398).

The contents of the submissions in relation to implementation of enforcement in respect of Protected Structures and Architectural Conservation Areas are noted. Planning enforcement is an operational matter and outside the scope of the Development Plan.

The Player Wills factory on South Circular Road is now on the RPS (Ref 8796).

Chief Executive's Recommendation

An amendment is recommended by the Chief Executive in relation to BHA2.

Amendment:

Chapter 11

Section: 11.5.1 The Record of Protected Structures

Page: 398 Policy BHA2

Amendment:

Policy BHA2 Development of protected Structures

(c): Ensure that works are carried out ~~(under the supervision of)~~ {in line with best conservation practice as advised by} a suitably qualified person with expertise in architectural conservation.

Section 11.5.2 Architectural Conservation Areas

Summary

Many submissions expressed support for the proposed priority ACA's at page 401.

Rathmines Initiative welcomes the inclusion of Grove Park in the priority list for ACA designation and requests the ACA designation be extended to Richmond Hill, Gulistan Terrace and Cottages, Wynnefield Road, Rathmines Park/York Road/York Avenue/Maxwell Road/ Frankfort Avenue/ Villiers Road, Cowper Road and Fortfield Terrace/ Palmerston Villas.

The LDA notes the Priority Architectural Conservation Areas include the CIE Estate Inchicore and Stoneybatter and submit that it would improve understanding if indicative diagrams of the designated areas of these ACA's were included in the Draft Plan.

There were numerous requests for additions to the list of Priority Architectural Conservation Areas (section 11.5.2 pp. 401-402) including the following:

- Phibsborough Centre
- Iona District of Glasnevin
- Shandon area of Phibsborough
- Highfield Grove in Rathgar
- Iveagh Gardens in Crumlin
- Temple Bar
- Lower Kimmage Road,
- North East Inner City
- Connolly Station and its surroundings
- Dame Street
- Liffey Quays
- Ranelagh
- Donnybrook
- Highfield Grove in Rathgar
- St. Josephs Place, Blessington Place and Blessington Court,
- Harold's Cross
- Blessington Street, Eccles Street and Nelson Street; plus North Frederick Street
Blessington Basin and Four Masters Square
- Sandymount Area (entire)

Temple Bar Residents requested that the entire Temple Bar area from Fishamble Street in the west to Westmoreland Street in the east, and from College Green / Dame Street / Cork Hill / Lord Edward Street on the south to Aston Quay / Wellington Quay / Essex Quay to the north, be designated an ACA or added to the list of priority ACAs.

It was submitted that the southern part of the O'Connell Street ACA should be extended to include Westmorland Street, D'Olier Street, College Street and the western end of Cork Hill, Lord Edward Street, Castle Street and Christchurch Place.

There was a submission that the Circle K Belmont service station on Sandford Road, Ranelagh be removed from within the designated ACA boundary.

Richview Residents Association request that Objective BHAO2- Designation of ACAs should become a policy.

A number of submissions requested a modest prevailing height rule to apply to any new structures within an ACA and concerns were raised regarding the impact of build-to-rent developments and hotels on Dublin's ACA's.

There was a call in some submissions that the scope of an ACA goes beyond protecting structures of architectural interest to protecting anything in a community that lends its special character such as community centres, public buildings, spaces and squares, green spaces, local wildlife and ecosystems.

It was submitted by the Civic Trust that ACA's require a thorough rebrand and should not be seen as constraints to development, that the process should be stream-lined and that enforcement for unauthorised development in ACA's should be improved. The Civic Trust request an objective in the Dublin City Development Plan to 'establish conservation-led management and monitoring of the historic fabric and presentation of ACAs within the city core in acknowledgement of their prominent role representing the civic values of the capital and the nation.'

Several submissions state that planning enforcement for unauthorised development in ACA's in Dublin City is inadequate. It is also submitted that ACA's are not managed and do not coordinate with public realm works and there is a need to improve enforcement for unauthorised works in ACA's.

CIE have expressed concerns that the proposed adoption of an Architectural Conservation Area at the CIE Estate, Inchicore would limit the amount of development that would be exempt and that the industrial/ engineering necessities would lose out to statutorily required preservation, which could have the effect of moth balling a site and rendering it difficult to function for the purpose it was designed, and might prevent it from meeting new challenges and new requirements.

Iarnród Éireann comment in relation to the addition of CIE Estate Inchicore to the priority ACA list that in the context of advancing railway operations and other potential demands on the lands, the extent of the ACA should be carefully considered and request that any designation should not preclude any development in furtherance of public transport uses or operations.

Lower Kimmage Road Residents' Association recommend additions to policies BHA7 and BHAO2 seeking inclusion of text in relation to pending ACAs.

It is requested that Policy BHAO4- Bewley's Oriental Café be amended to allow for a mix of uses on all floors and that the restricted café use contemplated for basement, ground and first floor be removed in order to provide greater flexibility to aid securing a viable commercial future for the building by enabling some sections of the ground floor be used for servicing other uses at upper floor levels and not wholly used for the café.

The Civic Trust request the additions to Policy BHA7- Architectural Conservation Areas in relation to window preservation and replacement.

Clontarf Residents Association request that DCC proactively engage with local historical groups and architects with a view to identifying other buildings, features or areas that ought to be protected as ACAs and Protected Structures.

It is submitted in relation to the ACAs such as Henrietta Street and North Great George's Street that the maps are coloured orange and called 'Georgian Conservation Areas.' The point is raised that 'Architectural Conservation Areas' are in green and these do not correspond to the ACAs.

Chief Executive's Response

The support in submissions for the proposed Priority Architectural Conservation Areas in the Draft Plan at The Tinters, the CIE Estate at Inchicore, Harold's Cross, Ceannt Fort, Grove Park and Temple Bar is noted.

The designated boundary for each ACA brought forward will be determined during the assessment stage and will be subject to public consultation during the display stage of the Draft ACA. It is noted that the Architectural Heritage Protection Guidelines for Planning Authorities (2011) provide that '*the boundaries of a candidate ACA should make physical, visual and planning-control sense*' and that '*it may be necessary to refer back to the core characteristics of the area in order to establish the most appropriate boundary lines*'.

The requests for additional Priority Architectural Conservation Areas (Section 11.5.2) are noted. Whilst some of the areas nominated are potentially suitable as candidate ACAs, the Draft Plan already proposes fifteen (15) new ACAs for prioritised assessment under the new Plan; this is an ambitious target. It is also noted that two of the areas nominated in submissions are already on the ACA priority list; Harold's Cross and Temple Bar. Accordingly, following careful consideration, the Chief Executive recommends that one additional ACA 'Iveagh Gardens, Crumlin' should be added to the priority list.

All the other areas put forward in submissions will be added to the list of ACA nominations held by the Conservation Section, for assessment under further phases of the Section's work programme.

In relation to the LDA submission on the proposed ACAs at the CIE Estate in Inchicore and Stoneybatter, the designated boundary of each ACA will be considered and determined at assessment stage in accordance with the Architectural Heritage Protection Guidelines for Planning Authorities (2011). It is noted that the preparation of a draft ACA is subject to a formal, statutory public display and consultation process, during which submissions may be made on its contents and provisions, including the proposed boundary.

The request to extend the southern area of the O'Connell Street ACA so as to include College Street, Dame Street, the western end of Cork Hill, Lord Edward Street, Castle Street and Christchurch Place, is noted. The Chief Executive considers that the boundary of the O'Connell Street ACA, as adopted on 09/07/2001, was carefully considered as part of a detailed assessment of the area to be designated. The ACA and its designated area was adopted by the City Council following the statutory public consultation process, including the consideration of submissions received as part of that process at the time.

Regarding the submission that the Circle K Belmont service station on Sandford Road be removed from the designated area of the Belmont Road and Mount Eden Avenue ACA, the Chief Executive notes that the ACA boundary was considered at the time of the making of the ACA (2015) and its extension (2016) and went through the statutory public consultation process, including the consideration of written submissions made, prior to adoption by the City Council. The Chief Executive recommends no change to the designated area (boundary) of the Belmont Road and Mount Eden Avenue ACA.

The submission proposing Objective BHAO2 be amended as a policy would not be suitable for the programming of ACA identification and designation.

The submissions requesting a 'modest prevailing height rule' for new structures within ACAs, and those for extending BHA7 and BHAO2 to proposed ACAs, are noted. However, specific policies and objectives for development management and the control of otherwise exempted development within an Architectural Conservation Area are a matter to be considered during the preparation of each ACA and its adoption by the City Council in accordance with Chapter II, Part IV of the Planning and Development Act, 2000 (as amended); including the statutory public display/consultation process and consideration of submissions and observations received as part of that process.

In response to submissions calling for the scope of ACAs to go beyond the protection of architectural character and embrace community infrastructure and amenities, the Chief Executive notes that the objectives of an Architectural Conservation Area are identified in Section 81, Chapter II, Part IV of the Planning and Development Act, 2000 (as amended). The Planning Authority is also guided by Chapter 3 of the Architectural Heritage Protection Guidelines (2011) in relation to the contents and provisions of ACAs.

The Chief Executive shares the opinion of Dublin Civic Trust that ACAs should not be considered a constraint, but as a positive enabler of appropriate development that enhances the architectural character of the area. It is noted that the objectives of an Architectural Conservation Area are identified in Section 81 of the Act and that guidance is provided in Chapter 3 of the Architectural Heritage Protection Guidelines (2011) for the preparation of ACAs; including public consultation.

The Chief Executive acknowledges the submissions seeking greater engagement with local groups in relation to identifying areas for ACAs and supports such early engagement, subject to the objectives for ACAs in Section 81 of the Act and the provisions of Chapter 3 of the Architectural Heritage Protection Guidelines (2011) for the preparation of ACAs; including public consultation.

The submission proposing the provisions of a draft ACA (pending ACA) be included in Policy BHA7 of the Draft Plan would not be in accordance with the statutory provisions of the Planning and Development Act, 2000 (as amended). The provisions of an ACA only become into operation following the adoption of the ACA by the City Council.

Regarding Objective BHAO2 and the identification and designation of ACAs other than those prioritised is already addressed on p. 401 of the Draft Plan, which provides "These 15 ACAs and any other considered necessary at any time, will be progressed over the development plan period subject to a prioritisation programme to be agreed as part of the implementation of the development plan and the availability of resources".

In relation to Bewley's, it is considered that the open character of the ground floor café and its historic fixtures and fenestration are an intrinsic element to the value of the building. Whilst the commercial challenges of all uses in Grafton Street is recognised, particularly in the context of Covid; it is not considered that undermining the form and open character of the café space is the appropriate response to this important heritage building.

The proposed revisions to the zoning and objective maps of the Draft Plan are noted. The Chief Executive acknowledges that there are a number of 'conservation area' designations with separate colours; including Architectural Conservation Areas, red-hatched conservation areas,

Z2 residential conservation areas and Z8 'protection of architectural and civic design character'. However, it is noted that ACAs are the only statutory conservation areas under the Planning and Development Act, 2000 (as amended). The inclusion of proposed 'Georgian Conservation Areas' would simply add another layer of non-statutory designations to the mix, which would be unwieldy. Therefore, the Chief Executive recommends that the focus should be on the Priority Architectural Conservation Areas as proposed in the Draft Plan and the amendment referred to above.

Regarding mapping, it is noted that the respective Draft Plan zoning objective/specific objective maps are for illustrative purposes and subordinate to the Draft Plan written statement in the first instance, together with the written statement of each of the adopted ACAs across the city.

Regarding submissions on the issue of enforcement, the Chief Executive advises that enforcement is an operational matter for the Council's Planning Enforcement Section. Likewise, the matters raised in relation to road maintenance and public realm works are operational matters.

Chief Executive's Recommendation

One amendment is recommended in relation to the list of Priority Architectural Conservation Areas.

Amendment:

Chapter 11

Section: 11.5.2 Architectural Conservation Areas, subheading Priority Architectural Conservation Areas

Page: 401 - add bullet

Amendment:

- **{Iveagh Gardens, Crumlin}**

Section 11.5.3 Built Heritage Assets of the City

Summary

A number of submissions welcomed policies and objectives in Section 11.5.3, including Policy BHA15 Twentieth Century Buildings and Structures, Policy's BHA18 Historic Ground Surfaces, Street Furniture and Public Realm, BHA19 Historic Street Furniture and the RPS, Policy BHA20 Ghost Heritage Signs, Policy BHA24 Reuse and Refurbishment of Historic Buildings and Objective BHA05 Mews.

Additions were sought to Policy BHA9, Objective BHA06, Policy BHA18, Objective BHA012, Policy BHA15, Policy BHA17 and Section 11.5.3, seeking to include references to supporting services and amenities, additional community staff, a ban on telecommunications above ground, on use of advertising material on telecoms installations, the inclusion of references to rail vernacular heritage and the graving docks at Ringsend.

It is requested that Section 11.5.3, p. 410, which provides 'there will be a presumption against demolition of individual structures of vernacular or historic/ social interest that contribute to the character of an area' and Policy BHA 15: Twentieth Century Buildings and Structures, be

amended, with the statutory process of RPS additions solely used for protecting heritage building with the point made that the Draft is acting outside the legislation and contrary to the provisions of Part IV of the Act.

One submission seeks that Policy BHA 9: Conservation Areas is amended to add a bullet point 7 to strengthen residential uses and restrict changes of use from residential in conservation areas.

A submission in relation to Policy BHA12 requests that given the level of industrial heritage within the Kilmainham and Inchicore area, particular reference should be made to supporting a) restoration of the Camac River b) restoration of Kilmainham Mill c) a Transport Museum at CIE Inchicore d) the repurposing of Kilmainham Garda station, Old Kilmainham.

It is submitted that Policy BHA9: Conservation Areas should stipulate that cultural uses, such as exhibition spaces, rehearsal/ performance spaces, workshop areas will be prioritised as potential changes of use as well as for community projects/ gatherings.

There was a request that the importance of Connolly Station is recognised in Policy BHA12. It was also submitted that buildings of historical interest such as Connolly Station should be used to their fullest extent to celebrate their location and importance, as well as create a better social understanding of the area. It is suggested that a train museum occupy the older buildings.

A submission called for the Conservation section to be consulted on all planning applications for infill development in historic streets and requested this be included as an objective in the Development Plan.

Many submissions expressed concern that in many parts of the City, the original historic paving, historic street cobblestones or setts have been removed by DCC and replaced by inferior modern granite or in some instances, concrete slabs or tarmacadam cover. Several submissions objected specifically to the removal of the historic street surface at Castle Market and Temple Bar and requested they be restored.

It was also submitted that signage and associated posts needs to be rationalised and consolidated in historic areas.

It was submitted that many residential areas are zoned Z1 when they are of sufficient character and importance to warrant a Z2 zoning, including areas such as Neville Road, Vernon Grove, Templemore Avenue (Rathgar), Arranmore Road and other roads in Donnybrook.

Submissions raised some concern about the demolition of non-protected buildings, which are nevertheless of high architectural and historic value.

Chief Executive's Response

The number of submissions welcoming various policies and objectives in Section 11.5.3: Built Heritage Assets of the City is acknowledged and accepted.

In relation to changes of use and Policy BHA9, the Chief Executive considers that the wording already provided in the Draft Plan (p. 409) is appropriate to protect the special interest and character of these areas, while remaining open to positive change by means of compatible uses that would ensure the future viability of buildings in conservation areas.

The submission requesting the allocation of specific community officers and clinics to support Objective BHA06 (20th Century structures) is an operational matter and not appropriate for the Draft Plan. Officers of the Archaeology, Conservation and Heritage Section are available to advise property owners and members of the public on request and also provide presentations, seminars and other information events in relation to a range of issues relevant to the built heritage and architectural conservation.

The issue raised regarding telecommunications infrastructure and associated advertising is an operational matter for development management in accordance with the Planning and Development Regulations, 2001 (as amended) and the relevant provisions of any Architectural Conservation Area for the area.

The request that the Draft Plan be amended at Section 11.5.3 is noted. The presumption against demolition of structures that positively contribute to the character of a Conservation Area (Policy BHA10 p. 409), is a 'presumption' against such demolition or substantial loss and does not equate to 'blanket protection'.

The request to amend Policy BHA 9: Conservation Areas to add '*The return of the buildings to residential use*' (as bullet 7) and the submitted additional '*change of use from residential will not be allowed and change of use to residential will be encouraged*', is noted. This is primarily a development management issue, having regard to the relevant land use zoning objective for the area. In particular, the Z8 Zoning Objective for the Georgian areas of the city provided in the Draft Plan, expressly facilitates restoration, regeneration, cultural use and appropriate residential development and reuse, whilst controlling the concentration of office uses in these areas. Nevertheless, policy for these areas must also enable adaptation and reuse by compatible, non-residential uses in certain circumstances, to ensure the future viability of the range of built heritage assets.

The submission on BHA12 requesting support for the industrial heritage of the Kilmainham and Inchicore areas, including specific objectives for particular structures, is noted. The Chief Executive considers that these matters are more suited to a local built heritage strategy for the Kilmainham and Inchicore areas to be considered under the forthcoming Strategic Heritage Plan.

The Chief Executive acknowledges the submission requesting that the word '*locks and graving docks*' be added to Policy BHA12. Similarly, the submissions relating to Policy BHA17: Industrial Heritage of Waterways, Canals and Rivers in respect to the graving dock structures at Ringsend are noted.

The submission that the Conservation Section be consulted on all planning applications for infill development in historic streets and that this be included as an objective in the Plan, is noted. This is an operational matter for the Planning & Property Development Department.

Policy BHA18: Historic Ground Surfaces, Street Furniture and Public Realm is designed to manage the issues raised. The issue of works undertaken by or on behalf of the City Council to areas with historic street surfaces, such as Castle Market and Temple Bar, are operational matters.

The rezoning of residential areas from Zoning Objective Z1 to Objective Z2 is addressed in Volume 2 of the CE report.

Chief Executive's Recommendation

It is recommended that the locks and graving docks be included as follows:

Chapter 11

Section: 11.5.3 Built Heritage Assets of the City, Subsection Buildings of Heritage Interest Including Mews and Vernacular Buildings

Page: 411

Amendment:

Policy BHA12 Industrial, Military and Maritime, Canal-side and Rural Heritage

To promote the awareness of Dublin's industrial, military and maritime, canal-side (including lock-keepers' dwellings, {locks and graving docks}, rail and rural (vernacular) heritage.

Chapter 11

Section: 11.5.3 Built Heritage Assets of the City, Subsection Industrial Heritage

Page: 413

Amendment:

Policy BHA17 Industrial Heritage of Waterways, Canals and Rivers

To support and promote a strategy for the protection and restoration of the industrial heritage of the city's waterways, canals and rivers, including retaining features such as walls, weirs, ~~(and)~~ millraces ~~(-)~~ {and the graving dock structures at Ringsend.}

Section 11.5.4 Retrofitting, Sustainability Measures and Addressing Climate Change

Summary

A number of submissions support the policies and objectives in Section 11.5.4 Retrofitting, Sustainability Measures and Addressing Climate Change.

One submission notes that paragraph 1 of section 11.5.4 Retrofitting, Sustainability Measures and Addressing Climate Change which states 'The enhanced thermal performance requirements (Part L) of the Building Regulations do not apply to buildings included on the Record of Protected Structures' is outdated and needs to be urgently reviewed as insulation techniques, heat pump technology have improved and renovation of even the most sensitive historic structures is feasible and economic. There was concern that protection as understood currently has the potential to act as a barrier to real and valuable adaptation.

The Land Development Agency (LDA) supports and encourages the City Council to facilitate the adaptive reuse of buildings where feasible. However, they note that due to the nature and use of much state-owned land, extensive existing buildings are often in situ and request a balanced and proportionate approach to facilitate appropriate reuse and retrofitting across the city.

Lower Kimmage Road Residents Association request that Policy BHA21: Retrofitting Sustainability Measures includes reference to supporting staff resources to assist implementation.

Chief Executive's Response

The Chief Executive notes that the Department of Housing, Local Government and Heritage is currently preparing new draft guidance for improving Energy Efficiency in Traditional Buildings which will complement the *Advice Series on Energy Efficiency in Traditional Buildings (2010)*.

Section 0.6.1 of Part L of the Building Regulations state that '*Part L and the European Union (Energy Performance of Buildings) Regulations 2019 do not apply to works (including extensions) to an existing building which is a "protected structure" or a "proposed protected structure" within the meaning of the Planning and Development Act 2000 (No. 30 of 2000)*'. However, this is later qualified within the document stating that '*The aim should be to improve the energy efficiency as far as is reasonably practicable*' but that '*the work should not prejudice the character of the building or increase the risk of long-term deterioration of the building fabric*'. Options for the sensitive thermal upgrading of a traditional building can be considered on a case-by-case basis, noting that proposals to Protected Structures and/or structures located within an ACA may require planning permission.

Dublin City Council acknowledges the LDA's commitment to undertake sensitive and appropriate adaptive reuse of sites where buildings of heritage value or protected structures are located. It is noted that redevelopment/regeneration of such sites will be subject to planning permission and will be assessed on their merits, having regard to development parameters that contribute to the setting of protected structures or structures of special/heritage interest as specified under Policies BHA5, BHA6 and/or BHA8 of the Draft Plan.

The use of heat pumps, solar energy and smart technology are not precluded for use in historic buildings, subject to proposals being sensitive to and compatible with the architectural character and special interest(s) of the building. It is anticipated that the forthcoming DHLGH guidelines on Energy Efficiency in Traditional Buildings will address this matter.

The provision of local community officers and clinics for the achievement of energy efficiency targets for an area and/or to assist in community engagement is an operational matter and not one for the Development Plan.

Chief Executive's Recommendation

No change is recommended as existing text satisfactorily responds to issues raised.

Section 11.5.5 Archaeological Heritage

Summary

The Department of Housing, Local Government and Heritage made a number of recommendations and requests for changes to the Draft Plan including:

- (i) A request that the Development Plan reference the publication of the Built and Archaeological Heritage Climate Change Sectoral Adaptation Plan (Department of Culture, Heritage and the Gaeltacht, September 2019).
- (ii) A change to the text at section 11.5.5 Archaeological Heritage pg. 418, first paragraph as they express the opinion that the text seems understated for a city for which World Heritage Site status may be sought as stated in development plan objective BHA29 World Heritage Nomination and put forward a suggested replacement text.

- (iii) A change to the text at section 11.5.5 Archaeological Heritage, Record of Monuments and Places, pg. 422, first paragraph to expand the description of the Record of Monuments and Places and clarify the circle/polygon marking such does not define the extent of the monument or place, nor does the RMP record all known sites and monuments. They seek reference to updated sources including the Historic Environment viewer (HEV).
- (iv) Clarification in relation to Map L and page 422 as to whether Map L represents the RMP for the Local Authority area and request adjustments to the boundary of the urban archaeological zone for Dublin City area as it is truncated by the frame of Map L and would be difficult for the reader to appreciate its extent and the area that it encloses and that the title and text on the map should be adjusted to reflect the purpose of the map.
- (v) Note that under Section 11.5.5 Archaeological Heritage, Record of Monuments and Places page 422, third and fourth paragraph, that the term 'Zone/Zones of Archaeological Interest' is introduced in the draft text. They state that if 'Zone of Archaeological Interest' is to be used in a specific technical sense within the context of the City Development Plan, the term should be clearly defined within the plan and used consistently. The term, as it stands, is not one that is used in the context of the National Monuments Act and is not used in common archaeological parlance.
- (vi) Request a change to the text at pg. 422/3 to reference section 14 of the National Monuments Act 1930 (as amended).
- (vii) Request a change to the text at pg. 423, final sentence to replace the phrase archaeological legacy with rich archaeological heritage.
- (viii) Request a change to the text at Section 11.5.5 Archaeological Heritage at pg. 418 and 419 and to BHA26 to reference ship wrecks and expand the current description and threats and to the legal protection relevant to wrecks and underwater heritage.

A submission from the Lower Kimmage Road Residents Association notes the challenges in accessing archaeological heritage information and requests a public information and awareness raising campaign, greater investment in the conservation, management and interpretation of sites and monuments and public awareness.

One submission raised the issue that it is not enough that archaeological sites are 'preserved by record'. People need to be able to connect with the past in the locations where events took place. Sites should not only be archaeologically investigated but artefacts discovered should be displayed nearby.

Chief Executive's Response

In relation the submission by the Department of Housing, Local Government and Heritage

- (i) The Chief Executive considers it is appropriate to reference the Built & Archaeological Heritage Climate Change Sectoral Adaptation Plan in section 11.5.5 of the Draft Plan and a recommendation is made to this end.
- (ii) In relation to the change of text at section 11.5.5 Archaeological Heritage in relation to the World Heritage Site status, the comments are noted and a recommendation is made to amend the text as requested.
- (iii) The comments in relation to the circle or polygon for sites on the Record of Monuments and Places (RMP) not necessarily defining the extent of the monument or place is noted. It is also agreed that it is important to take all monuments identified on the Historic Environment Viewer (HEV) <https://maps.archaeology.ie/HistoricEnvironment/> into account

when proposing new developments within Dublin City. In the interests of clarity, it is considered appropriate to amend the text to take this into account.

- (iv) The draft text mistakenly states that 'The Record of monuments and Places for Dublin City is listed in Appendix 6 and detailed on map L' but this is an error. Appendix 6, Section 4.4 lists only the National Monuments in State Care. It does not provide a list of the RMPs in the Dublin City Council Area but refers the reader to www.archaeology.ie where the maps and manual containing the RMP information can be viewed. All RMP sites that are located outside of the historic city (DU018-020) are depicted on Maps A-H as castle symbols with numbers that correspond with the RMP. The individual RMP sites (approx. 350 in number) within the core historic city area (DU018-020) are not shown on Development Plan maps A-H to avoid over-cluttering the maps. Although Map L shows the City Walls, the walled circuit is not the primary focus. The overarching aim of Map L is to provide information about those known sites and monuments located within the historic city. The draft Map L however depicted those site and monuments that were on the HEV dataset at the time Map L was compiled in 2021, creating a lack of consistency between maps and it is now proposed to rectify this and provide additional information to enable clarity.
- (v) It is recognised that the term 'Zone/Zones of Archaeological Interest' in the draft text was carried over from previous Dublin City Development Plans and does not have a statutory origin. The information on which the Zone/Zones of Archaeological Interest and the maps showing those Zone/Zones of Archaeological Interest for Dublin City is based was derived from the Record of Monuments and Places as Established under Section 12 of the National Monuments (Amendment) Act 1994. It is recommended that the term 'Zone/Zones of Archaeological Interest' be replaced on Map L and through the text in a number of locations with 'Record of Monuments and Places as established under Section 12 of the National Monuments (Amendment) Act 1994' to align the Plan better with the relevant legislation.
- (vi) In relation to the request for a change of text at pg. 422/3, the Chief Executive considers it appropriate in the interests of clarity to amend the text as requested.
- (vii) The request a change to the text at pg. 423, the suggested replacement wording is recommended to be used in the Draft Plan, in the interests of clarity.
- (viii) The request in relation to changes to the text to include greater reference to wrecks and underwater archaeology in Section 11.5.5 Archaeological Heritage at a number of locations within the section is accepted and recommendations in relation to each are made in this report.

In relation to the submission regarding the challenges in accessing archaeological heritage information and the request for a public information and awareness raising campaign, it is highlighted that national archaeological and architectural baseline information is available on the Historic Environment Viewer (HEV) <https://maps.archaeology.ie/HistoricEnvironment/>. A County Dublin Archaeology GIS dataset is also available online via the Heritage Map viewer <https://www.heritagemaps.ie/WebApps/DublinCountyHeritage/index.html>. This GIS resource was developed as an action of the four County Dublin Heritage Plans and contains archaeological grey literature from development led excavations. The Dublin City Industrial Heritage Record (DCIHR) is also published on www.heritagemaps.ie. This was developed as an archaeological action of the first Dublin City Heritage Plan. The DCHIR survey mapped 1219

sites throughout the city and produced a written record for each site along with an extensive photographic record.

An introduction to Dublin City's Industrial Heritage is proposed as an action of the Heritage Plan. Public information and awareness-raising campaigns regarding the City's archaeological will be delivered through the Dublin City Heritage Plan and other archaeological initiatives, in particular the Community Monuments fund (CMF). The CMF has a key role to play in supporting the implementation of the Development Plan through funding conservation management plans and direct works to protect and interpret sites and monuments in the city. It is proposed to include a reference to this role in the Draft Plan to reflect the importance of this fund in light of the issues raised by the submission.

In relation to the request that more archaeological sites are 'preserved by record', it is noted that Policy BHA26 supports protection of archaeological material in situ. In this context, it is considered that this issue is adequately addressed in the Draft Plan.

Chief Executive's Recommendation

Chapter 11

Section 11.5.5 Archaeological Heritage

Pg. 419, end of text

Amendment:

{The 2019 publication 'Built and Archaeological Heritage Climate Change Sectoral Adaptation Plan', prepared under the National Adaptation Framework by the Department of Culture, Heritage and the Gaeltacht, sets out an approach to respond to the challenges climate change poses to built and archaeological heritage. The plan is framed by five goals –

- (i) To improve understanding of each heritage resource and its vulnerability to climate change
- (ii) To develop and mainstream sustainable policies and plans for climate-change adaptation of built and archaeological heritage
- (iii) To conserve Ireland's heritage for future generations
- (iv) To communicate and transfer knowledge
- (v) To exploit the opportunities for built and archaeological heritage to demonstrate value and secure resources

Dublin City Council fully supports the goals and aims of the adaptation plan and will work with key stakeholders to this end.}

Chapter 11

Section 11.5.5 Archaeological Heritage

Pg. 418, first paragraph

Amendment:

Dublin City has a rich archaeological heritage. It has a recorded history of human settlement of over 9,000 years, centred along the line of the River Liffey. ~~(While there are few upstanding monuments in the city centre, beneath the surface is a rich and complex record of human~~

~~activity. The upstanding monuments that survive include the city walls, several castles, churches and graveyards and the quay walls.)~~ {There are significant upstanding monuments of archaeological interest across Dublin's city centre including the ancient city walls, castles, churches and graveyards and the River Liffey quay walls. As with other European capital cities Dublin also has important subsurface archaeological remains that represent the history of the development of the city from its origins through the medieval period right up to modern times.} Mesolithic fish traps were excavated at Spencer Dock, while an exceptionally well-preserved Viking town was uncovered at Wood Quay. There are over 600 shipwrecks recorded in Dublin Bay, while the industrial heritage of the city c.1750-1950 survives in areas such as St James's Gate.

Chapter 11

Section 11.5.5 Archaeological Heritage, Record of Monuments and Places

Pg. 422, first paragraph

Amendment:

The Record of Monuments and Places (RMP) was established under Section 12 of the National Monuments (Amendment) Act, 1994. Structures, features, objects or sites listed in this Record are known as Recorded Monuments. ~~(The RMP is accompanied by a set of maps on which monuments are designated by a relevant reference number and denoted by a circle defining a Zone of Archaeological Potential. The Record of Monuments and Places for Dublin City is listed in Appendix 6 and detailed on Map L)~~ {The Record of Monuments and Places (RMP) consists of a published county-by-county set of Ordnance Survey maps, on which monuments and places are marked by a circle or polygon, and an accompanying book for each county listing the monuments and places. It should be borne in mind that the circle or polygon does not necessarily define the extent of the monument or place. Much of the area of the core of modern Dublin City is designated in the RMP as 'Historic City' including the remains of the city walls and individual monuments that have been identified within the medieval walled town and around its environs. The RMP does not include all known archaeological sites and monuments, given that further such sites and monuments are found on an ongoing basis. For that reason, it is important (in the context of considering proposed development) to take account of all information available on the Historic Environment Viewer (HEV) available at www.archaeology.ie. The HEV will provide information not only on those archaeological monuments included in the statutory RMP, but also in regard to many more which have been identified since the RMP was issued. Such newly identified monuments will appear in future revisions of the RMP. RMP sites outside of the historic city are shown on Maps A-H. RMP within the historic city area (DU018-020) are shown on Map L. Appendix 6, Section 4.4 of this Plan lists the National Monuments in State care.}

Chapter 11

Section 11.5.5 Archaeological Heritage

Pg. 17, 394, 422, 424, Executive Summary

Amendment

Delete the phrase ~~(Sites and Zones of Archaeological Interest)~~ and replace with {Record of Monuments and Places (RMP) as Established under Section 12 of the National Monuments (Amendment) Act 1994.}, and make any necessary related consequential minor amendments within the Draft Plan.

- Page 17, the Executive Summary
- Page 394, in the list of bullet points
- Page 422, third and fourth paragraph
- Page 424, BHA26, paragraph 1, 3 & 4).

Chapter 11
Section 11.5.5 Archaeological Heritage
Pg. 422/3, fifth paragraph

Amendment:

Insert text:

For National Monuments in the ownership or guardianship of the Minister or a local authority or which are subject to a preservation order, the prior written consent of the Minister is required for any interference with the monument, {under section 14 of the National Monuments Act 1930 (as amended).}

Chapter 11
Section 11.5.5 Archaeological Heritage
Pg. 423, final sentence

Amendment:

The policies and objectives below are intended to {identify, preserve,} conserve, raise awareness of {and provide access} to Dublin City's rich archaeological heritage.

Chapter 11
Section 11.5.5 Archaeological Heritage
Pg. 418, first paragraph

Amendment:

There are over 600 shipwrecks recorded in Dublin Bay {and the River Liffey. Many additional wrecks whose precise location is unknown are also likely to be present,} while the industrial heritage of the city c.1750-1950 survives in areas such as St. James's Gate.

Chapter 11
Section 11.5.5 Archaeological Heritage, Record of Monuments and Places
Pg. 419, Amendment to bullet point 5 and new bullet point 6

Amendment:

All previously unknown archaeology that becomes known (e.g. through ground disturbance, fieldwork or the discovery of {wrecks} or sites underwater.

New Bullet point 6

- {Wrecks over 100 years old and archaeological objects underwater, irrespective of their age or location, are protected under the National Monuments Acts. Wrecks, though less than 100 years old, as well as sites or areas around sites or archaeological objects, due to their historic, archaeological or artistic value, can

also be protected by means of designation through placement of an Underwater Heritage Order (UHO). See <https://www.archaeology.ie/underwater-archaeology/planning-and-development> for further detail in relation to planning and development and <http://www.archaeology.ie/underwater-archaeology/wreck-viewer> for the relevant mapping information.

Chapter 11

Section 11.5.5 Archaeological Heritage

Page: 424, Policy BHA26 Archaeological Heritage

Amendment:

Paragraph 1

To protect and preserve Sites and Zones of Archaeological interest which have been identified in the Record of Monuments and Places and the Historic Environment Viewer (www.archaeology.ie) {and all wrecks over 100 years old including those in the Shipwreck Inventory of Ireland.}

Paragraph 3

To seek the preservation in situ (or where this is not possible or appropriate, as a minimum, preservation by record) of all archaeological monuments included in the Record of Monuments and Places, ~~{and of previously unknown sites, features and objects of archaeological interest that become revealed through development activity}~~ {all wrecks and associated objects over 100 years old and of previously unknown sites, features and objects of archaeological interest that become revealed through development activity.} In respect of decision making on development proposals affecting sites listed in the Record of Monuments and Places, the Council will have regard to the advice and/or recommendations of the Department of Housing, Heritage and Local Government.

Paragraph 4

Development proposals within Sites and Zones of Archaeological ~~{Notification}~~ ~~{Interest}~~, of sites over 0.5 hectares size, {with potential underwater impacts} and of sites listed in the Dublin City Industrial Heritage Record, will be subject to consultation with the City Archaeologist and archaeological assessment prior to a planning application being lodged.

Paragraph 7

Development proposals in marine, lacustrine and riverine environments and areas of reclaimed land shall have regard to the Shipwreck Inventory maintained by the {Department of Housing, Local Government and Heritage} ~~{Department of Culture, Heritage and the Gaeltacht}~~ and be subject to an appropriate level of archaeological assessment.

Chapter 11

Section 11.5.5 Archaeological Heritage

Pg. 426, Objective BHA019

Objective BHA019 Built Heritage and Archaeology

To provide for the protection, preservation and promotion of the built heritage, including architectural heritage and archaeological heritage {and underwater heritage} and support the in-situ presentation and interpretation of archaeological finds within new developments.

Amendment Map L:

The following changes are recommended:

1. The geographical area to be amended on Map L to mirror RMP Sheet 3263 as opposed to just 3263B to show the entire RMP area for the historic city (DU018-020).
2. RMP sites replace the HEV sites currently shown on Map L to ensure consistency across all the development maps.
3. Delete from the Legend of Maps (A-H & L)
~~{Sites and Zones of Archaeological Interest}~~
and replace with
{Record of Monuments and Places (RMP) as Established under Section 12 of the National Monuments (Amendment) Act 1994.}
4. All maps including Map L to include the following in the legend:
{The RMP does not include all known archaeological sites and monuments, given that further such sites and monuments are found on an ongoing basis. For that reason, it is very important (in the context of considering proposed development) to take account of all information available on the Historic Environment Viewer (HEV). }
5. Delete
~~{See Figure 54, Chapter 11 of written statement for detailed illustration}.~~
And replace with
{See Figure 11-2: Dublin's Historic Core and Figure 11-3: Location of Dublin City Walls, Remains and Features.}

Chapter 11

Section 11.5.5 Archaeological Heritage, Record of Monuments and Places
Pg. 419, end of text.

Amendment:

{Dublin City Council recognises the key role the Department of Housing, Local Government and Heritage have and will continue to work with the Department to promote the protection of the City's archaeological heritage, including seeking funding through the Community Monuments Fund (CMF) to implement the policies and objectives of the Plan by supporting owners and custodians (including Dublin City Council) of archaeological monuments to safeguard them into the future for the benefit of communities and the public.}

Section 11.5.6 City Heritage Plan

Summary

Several submissions requested heritage plans for specific areas, including Iveagh Markets, Mother Redcap covered market, Dublin City covered market, Moore Street market, Meath Street/Thomas Street markets stalls and for the horses and carriages at Guinness driving to Stephen's Green and the Liberties. There were also requests for extensions to heritage trails.

A number of submissions welcome Policy BHA33- Dublin Port Heritage Quarter, Policy BHA30 Moore Street National Monument and Policy BHA 27- Dublin City Heritage Plan.

There was a request that historic street names be decolonised and that names should be related to the country's history, culture, local area and nature.

There was a request to mark former Cllr John Gallagher within the proposed heritage plan for his role in Wood Quay protests, the establishment of the Liberties Heritage Association, his wide-ranging community activity and his archive.

It was submitted that special mention should be made in the City Heritage Plan of the Iveagh Gardens. It should be stated that; 'Dublin City Council respects and is committed to retaining the Ninian Niven landscaping design and the unique walled garden character of the Iveagh Gardens; the City Development Plan recognises the historical, cultural and heritage value of the Iveagh Gardens as a unique part of the city's heritage and a valuable green amenity and that the Dublin City Development Plan supports the original agreement under which the gardens were given to the city of Dublin by Lord Iveagh 'That they remain intact as a lung for the city.'

Lower Kimmage Road Residents Association recommends additions to Policy BHA27- Dublin City Heritage Plan and Policy BHA28 to refer to neighbourhoods bordering the canal and to protect traditional names.

Several submissions requested that Moore Street be preserved. The Liberties Cultural Association requested that a permanent 'Eternal Flame' be incorporated into the Moore Street National Monument as a testimony to 1916.

Diageo request an objective similar to those in Objective BHA014 and Objective BHA017 be included to recognise the contribution of the Guinness storehouse to Built Heritage focused tourism in the city.

It is requested that Dublin City Councillors and the Executive Management team in charge of the city develop a working proposal in conjunction with the local community of the Liberties to bring the Iveagh Markets back into public ownership of the City of Dublin and apply for funds from central government to restore and redevelop the Iveagh Markets to a fully working public amenity.

There was a request for Baggot Street Hospital to continue as a public amenity and a request that it would be ideal for a Museum of the City of Dublin.

Chief Executive's Response

The request for heritage plans for specific areas are noted. The role of historic markets in promoting the viability and vitality of the city centre is acknowledged.

The submissions in support of Policy BHA33- Dublin Port Heritage Quarter, Policy BHA30 Moore Street National Monument and Policy BHA 27- Dublin City Heritage Plan are noted and welcomed by the Chief Executive.

The concerns raised in relation to Iveagh Market are noted. In this regard, Objective CCUVO12 Iveagh Market 'To support a regenerated Iveagh Market as a major visitor attraction and as a local amenity for the community and to ensure that regeneration proposals include an appropriate community/civic space' provides policy to address this issue.

Cllr John Gallagher was an incredibly important figure in the Liberties as a councillor and local historian. All proposals for the erection of commemorative plaques, the dedications of

memorials, and the naming of infrastructure are considered by the Council's Commemorations and Naming Committee.

In relation to Guinness Storehouse it is considered that the City has many important tourism heritage assets and it is not appropriate or feasible to give each an objective, and that objective BHA017 adequately addresses the point raised sufficiently with a minor amendment.

Policy BHA27- Dublin City Heritage Plan relates to the implementation of the current Dublin City Heritage Plan and the preparation and implementation of the Dublin City Heritage Plan 2022-2026. It is considered that the words 'including the important historically rich boundary neighbourhoods bordering the canal cordon' is not necessary in this context. The historically rich boundary neighbourhoods bordering the canal cordon are protected under other policies and objectives throughout chapter 11- Built Heritage and Archaeology.

Chief Executive's Recommendation

One amendment is recommended by the Chief Executive for new text below. Otherwise, no further change is recommended as the existing text in the Draft Plan satisfactorily responds to the issues raised.

Amendment:

Chapter 11

Section: 11.5.5

Page: 425 insert additional text

Objective BHA017 Tourism

Promote tourism in the medieval and historic core of the city drawing on its archaeological and industrial heritage to create a strong an authentic sense of place and to support educational and historical tours of sites in the city.

Chapter 12: Culture

Chapter 12: Culture

Submission Number(s):

0210, 0601, 0673, 0701, 0755, 0846, 0853, 0888, 0925, 0939, 0948, 0953, 0964, 0969, 1030, 1038, 1040, 1046, 1053, 1063, 1068, 1083, 1120, 1137, 1150, 1179, 1191, 1194, 1201, 1226, 1268, 1298, 1307, 1310, 1353, 1383, 1386, 1395, 1398, 1406, 1450, 1466, 1482, 1501, 1508, 1529, 1540, 1541, 1553, 1554, 1557, 1568, 1572, 1576, 1584, 1590, 1595, 1607, 1608, 1620, 1639, 1645, 1655, 1668, 1681, 1682, 1687, 1688, 1697, 1698, 1700, 1705, 1706, 1729, 1734, 1740, 1743, 1750, 1755, 1756, 1762, 1767, 1770, 1771, 1772, 1773, 1783, 1784, 1802, 1808, 1809, 1811, 1814, 1816, 1826, 1827, 1834, 1839, 1842, 1845, 1855, 1857, 1860, 1862, 1882, 1973, 2056, 2087, 2095, 2120, 2122, 2124, 2129, 2139, 2144

Sections 12.1 – Sections 12.4: Introduction, Achievements, Challenges

Strategic Approach

Summary

A number of submissions gave broad and general support for the inclusion of a culture chapter, as well as the focus on protecting and growing cultural spaces and use of vacant land and night time activities. Some submissions seek a cultural zoning within the plan, and others call for a stronger definition of culture in the Plan. Some submissions call for audits of vacant land and Council land, seeking their use for cultural purposes.

Chief Executive's Response

The support expressed for the Draft chapter is noted. The CE considers that the range of policies and objectives included through the chapter address many of the points raised. The Draft Plan includes a definition of culture, drawn from UNESCO and the Cultural Audit undertaken as part of the background research for this chapter and no change is recommended. In relation to zoning, it is not considered appropriate to propose a cultural zoning as zoning objectives are a broad tool to ensure appropriate land use mix, which within each building and development can be very varied. The policies and objectives of the written statement give a much greater level of detail on the requirements of future forms of development and it is through these that the protection of and development of new cultural assets is best addressed. The auditing of vacant land is already in place, as part of the implementation of the Vacant Site levy, and the Derelict Sites Act; which is available to view (<https://www.dublincity.ie/sites/default/files/2022-03/vacantsitesregister.pdf>); and includes Council owned lands.

Chief Executive's Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Section 12.5- Policies and Objectives

Section 12.5.1- Protecting and Enhancing Dublin City's Cultural Assets

Summary

A number of submissions raise concerns in general about the loss of cultural space in the city and the lack of commitment to addressing this deficit; and seek greater commitment to invest in replacing what is lost. The need for funding of cultural spaces and increasing the number of artist studios in the city – both civic and independent- is raised by a number of submissions, with some suggesting additional objectives relating to funding. Criticism is also made with respect of the Fruit Market, Portobello Square and Parnell Square and the failure to develop/protect such assets for cultural use.

One submission references Objective CUO1 regarding the feasibility of a Museum of Dublin, and whilst supporting the provision of such a space, states that the objective lacks commitment or ambition and that the study proposed should be well researched and peer reviewed. The point is made in some submissions in relation to Objective CUO6 (Art and Cultural Infrastructure) that the redevelopment of vacant spaces should incorporate cultural spaces. It is also sought that Objective CUO6 include an assessment of institutional lands and require provision of cultural uses and habitat space on such lands. One submission supports Objective CUO5, the establishment of a cultural forum, and makes suggestions on the make-up of such a forum. Support is expressed in a number of submissions for Objective CUO3 - Dublin Music Resource Centre and Museum and for the inclusion of Policy CU6 - the Abbey Theatre.

Some submissions seek to include reference to artist studios and accommodation in Policy CU2 (cultural infrastructure) and to name specific locations for new cultural centres and studios. Another states that Policies CU2 and CU4 (cultural resources) are contradicted by Policy CEE29 (event venues, page 232).

Chief Executive's Response

The points raised by the submission regarding undertaking research is relevant to a study on a new museum and will form part of the feasibility study; however, for the purposes of the Draft Plan, such level of detail is not appropriate.

The Draft Plan includes objectives to address the shortage of cultural spaces needed for a growing city and requires larger scale developments to incorporate arts and cultural uses (see Objective CUO27- which seeks to develop new arts studios and re-use underused building for arts purposes); and also Objective CUO26 which seeks that all large scale development and regeneration projects contribute to arts/culture space through undertaking an audit where necessary, and Objective CUO22 which states that 5% community, arts and culture and artist workspaces must be provided in all developments over 10,000 sq. m. Furthermore, Objective CUO21 requires older industrial estates (over 2 ha) to accommodate cultural uses at design stage. The Draft Plan also encourages the use of arts and cultural uses as a suitable ground floor uses (Policy CU15) on quieter streets and to grow the overall provision of spaces within the city (Policy CU12).

The purpose of Objective CUO6 is the preparation of policy jointly with the Arts Office to inform redevelopment proposals as to (i) how to undertake an audit so that the outcome of their research can be incorporated into the design of larger scale redevelopments; (ii) how to

undertake temporary uses on vacant land; and (iii) design toolkits that give descriptions of the types of spaces needed for particular cultural uses to inform the design process.

Issues of land use and reservation of lands in relation to Z15 and Z12 lands are addressed under Chapter 14: Land Use Zoning, where the requirements of “institutional” type lands are set out. The suggested changes are not considered appropriate to the intent of the objective, with the above referenced objectives on large scale development applicable to all zoning locations. The wider issue of provision of new arts space within communities is addressed under Policy CU24 which seeks to deliver new civic arts and cultural spaces in urban villages and Objective CUO40 which aims to undertake an audit of each area of the city to identify those areas in need of investment.

The issue of artists’ studios and spaces is already addressed in a separate section – Section 12.5.4 (page 449-450), where two objectives seek to support the development of additional spaces. It is not appropriate to name out one specific location in this section. Policy CU2 and the other policies in this section set out an overarching policy for the city on culture and the proposed additional text would be out of context and inappropriate. The need for identification of areas with a shortfall is addressed in Section 12.5.5. It is not considered that Policy CEE29 contradicts Policy CU2 as Policy CEE29 is explicit that any on site consolidation by any particular venue cannot diminish their specific function as a nationally important venue.

The Development Plan supports the growth of cultural spaces; however, as a land use policy document, it is not the forum to address funding programmes for arts and cultural spaces.

Chief Executive’s Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Section 12.5.2- Cultural Hubs and Quarters

Summary

South Georgian Quarter - one submission seeks the inclusion of a reference to the National Children’s Science Centre (at Earlsfort Terrace).

Parnell Square and North Inner City - it is suggested that a community theatre is established on Capel Street (formerly the Torch Theatre) and to draw on the existing range of arts and cultural community activity in the area, including the Chocolate Factory, the Complex, MACRO in addition to the mix of eateries, colleges and retail to grow this cultural hub and give it a strong community led focus. Also suggested is the development of a cultural campus in the NEIC (supporting the community similar to the Roundhouse in London). A number of submissions seek changes to Objective CUO9 (Moore Street); one seeks housing and community uses on the street. Another seeks revisions to reflect existing planning permissions granted on the site in recognition that the objective is contradictory to determinations already made by the Planning Authority and question the legality of the wording of the objective. One seeks Telephone House (Marlborough Street) to be repurposed as a social space. Some submissions seek prioritisation of the Parnell Square library.

Dublin 8, Kilmainham and Inchicore - Objectives CUO11, CUO12 and CUO14 are supported in a number of submissions. One submission seeks an amendment to Objective CUO13 to incorporate buildings not part of one large regeneration site (referring to Emmet Road).

Additional text is sought in one submission on Objective CUO14 to give a wider scope of stakeholders. One submission seeks a new objective that the Weir Home at Cork Street is used as a nursing and medical museum. One submission seeks improved facilities for drama/panto/musical society where an adequate stage and backroom facilities are available to compensate for facilities lost to the area. A number of submissions seek objectives on future cultural use for the Kilmainham Garda Station, CIE Works and for Emmet Road library. One seeks clearer reference to the assets within the Liberties/James' Gate area of Dublin 8 and the potential for future growth.

Temple Bar - The IFI seek a statement of support in relation to growing the IFI to provide additional screening rooms, exhibition space and to develop a museum from its role as custodians of the Irish Film archive. The former Filmbase premises is identified as needing protection in a number of submissions. Support is expressed for the objectives seeking to protect the cultural assets with submissions seeking these are implemented. Changes to Objective CUO15 are also sought to include reference to residential amenity and to Objective CUO17 to include a presumption against expansion of licenced premises. New objectives are proposed in relation to the draft public realm plan and banning music events on Meeting House Square.

Docklands - one submission supports the inclusion of Docklands as a cultural hub and the related objectives; and seeks a new objective in relation to George's Dock. Phibsborough is proposed in some submissions as an additional cultural quarter.

Chief Executive's Response

South Georgian Quarter - The request to include a reference to the new National Children's Science Centre is noted and is recommended for inclusion in the Draft Plan.

Parnell Square and North Inner City - In relation to Objective CUO9, the suggestion of a theatre space within a cultural hub is welcome, however, such specific actions on purchasing of land and/or other specific buildings in the area is not a Development Plan matter. The CE recommends the inclusion of a new objective supporting the existing and expansion of arts facilities in the markets/Capel Street area to develop as a hub within its own right. The idea mooted of a culture campus is a positive one and one that Policies CU9 and CU12 and Objectives CUO10 and CUO41 would support. Marlborough House re-use proposals will be assessed through the Development Management process and its suggestion in relation to possible protection is addressed later in this report under Volume 4 - RPS.

In relation to the number of submissions suggesting changes to Objective CUO9, it is considered that the text of this objective should be revised to reflect the need to support the sensitive regeneration of the lands in question in the Moore Street area and to recognise that not all of the buildings named in the objective pre-date 1916 and are not part of the original historic fabric of the area.

Dublin 8, Kilmainham and Inchicore- support for the objectives is welcomed. It should be noted that Objective CUO13 refers specifically to regeneration projects in the Dublin 8 area and the additional text sought is relevant to only one particular location and it therefore not considered appropriate. In relation to the purpose of the request; the CE considers that the re-use of buildings of merit for cultural purposes is already supported under Objective COU41 and as such, it is considered the issue is satisfactorily addressed in the Draft Plan. The inclusion of details of any proposed individual development is not considered appropriate; as is the seeking to define the stakeholders in the Draft Plan; as these are not land use matters.

The suggestion of a new museum and cultural uses is made in relation to a number of buildings not in the ownership of the Council. It is noted that Objective COU41 provides support in a general way for the acquisition of buildings of merit for arts and cultural spaces. It is considered that this objective addresses this particular building and other possible similar buildings in the City if such opportunities emerge. The Draft Plan cannot direct specific uses for particular buildings not in Council ownership. Similarly, decisions on the use of vacated Garda Stations are a matter for the Department of Justice.

The comment on space for stage-based production is noted and it is considered that this issue will form part of an audit for the area. The comments on the assets are noted, and the CE recommends that additional text be included to give greater clarity as to the extent of the area and the existing assets.

Temple Bar- The need for the IFI to develop and grow is recognised and such, a development as described in the submission would be a cultural benefit to both Temple Bar and the wider City. It is, therefore, recommended objective CUO18 is expanded to support this endeavour. A technical correction is also recommended to this objective. The additional text to Objective CUO15 to include residential amenity is not considered appropriate as the purpose of the objective is to specifically protect cultural assets. Objective CCUV36 (page 261) clearly states that new evening uses shall result in minimal impact on adjacent residential uses and it is considered, therefore, that the issue is addressed in a form that covers the entire city. Also, Objective CUO17 references the need for protection of residential amenity within the area. It is recommended that the change to Objective CUO17 sought to presume against expansion of licenced premises can be included in the Draft Plan.

In relation to the objectives proposed in relation to the draft public realm plan and banning music events on Meeting House Square; the issues related to both are best addressed through the development management and event licencing process. The comments in relation to Filmbase are noted and the building is proposed for a new cultural use. It is proposed to add a new objective to protect key cultural infrastructure in Temple Bar in recognition of the investment made over past 30 years to develop this area as a cultural hub.

Docklands - In relation to Georges Dock, it is considered that Objective GIO34 which addresses the Docklands Water Animation Strategy already provides a policy base for the future regeneration of Georges Dock and a separate objective is not necessary.

Other - The addition of new quarters suggested in a number of submissions are not currently supported as the locations named have not developed to the extent that they are of national or citywide significance. Policy CU7 supports the growth and development of new quarters in the city, which will give policy support to any initiatives and growth of any area of the city as a culturally significant district.

Chief Executive's Recommendation

Chapter 12

Section 12.5.2- Cultural Hubs and Quarters

Page: 440

Amendment:

Significant investment has seen transformative improvements to the quality of space including the National Gallery, upgrades to the National Library, **(and)** the National History Museum **and**

the proposed development of a new National Children's Science Centre at Earlsfort Terrace}.

Chapter 12

Section 12.5.2- Cultural Hubs and Quarters

Page: 442, Objective CUO9 14-17 Moore Street

Amendment:

To support the preservation and restoration of the {national monument at 14-17} ~~(historic terrace 10-25)~~ Moore Street {together with} ~~(and adjacent yards and lanes, and)~~ the remaining historic built heritage of the street {and environs}, ~~(including numbers 1-8 Moore Street)~~, and the establishment of a commemorative visitor centre, as a fitting tribute to the men and women of Easter 1916 and as an educational and cultural resource centre.

Chapter 12

Section 12.5.2- Cultural Hubs and Quarters

Page: 442, New Objective, subsequent numbering to be amended accordingly

Amendment:

{Objective CUO11- Markets & Capel Street}

To retain existing and seek the development of new community, arts and entrepreneur led arts and cultural initiatives within the Markets Area of the City and to support this area developing an identity as a vibrant cultural hub within the city core.}

Chapter 12

Section 12.5.2- Cultural Hubs and Quarters

Page: 442 after 'support regeneration' as a new paragraph

Amendment:

{The area also contains a number of high profile cultural and tourism destinations including Christchurch and St. Patrick's cathedrals, and a range of brewing/distilling attractions; reflecting the craft and industrial heritage of this historic area.}

Chapter 12

Section 12.5.2- Cultural Hubs and Quarters

Page: 444, Objective CUO18- National Photographic Archive

Amendment:

Objective CUO18 ~~(National Photographic Archive)~~ {Gallery of Photography} and the {Irish Film Institute (IFI)}

{To support the expansion of the IFI and associated Irish Film Archive to create additional cultural offering for the City and to support the exploration of the possibility of a Museum and Archive of Irish Film;} and to ~~(recognise the need for the expansion of the photographic archive and to)~~ support the identification of a new space {for the Gallery of Photography} to meet the needs of this cultural facility.

Chapter 12

Section 12.5.2- Cultural Hubs and Quarters

Page: 444, New Objectives subsequent numbering to be amended accordingly

{Objective CUO19- Artistic Spaces

To protect key artistic spaces within Temple Bar that provide the basis of Temple Bar's cultural infrastructure and to ensure that any changes of use to such buildings continue to deliver artistic spaces or similar cultural uses.}

Chapter 12

Section 12.5.2- Cultural Hubs and Quarters

Page: 444, Objective CUO17 – Temple Bar

Amendment:

To seek to maintain the role of Temple Bar as a mixed-use cultural quarter and avoid the concentration of particular uses and retail facilities which would re-enforce particular activities in the area to the detriment of the cultural, residential and social functions of the area. ~~{Any application for}~~ {There will be a presumption against} further expansion of floor space for licenced premises, ~~{restaurant}~~ or the sale of food or alcohol for consumption off the premises, {and any application} will have to demonstrate how such expansion will not have a detrimental impact on the character of the area. {Any further expansion of restaurant floor space will be assessed on a case by case basis and will also be required to demonstrate how such an expansion will not have a detrimental impact on the character of the area.}

Section 12.5.3 Supporting Cultural Vibrancy in the City

Summary

A number of submissions raise concerns regarding the loss of cultural spaces to hotels and other commercial uses. Also raised in some submissions are concerns about implementation and funding of many of the policies and objectives within this section, particularly in relation to new artist spaces, venues and studios.

Some submissions state that the Draft Plan does not sufficiently protect cultural spaces. A number of submissions express support for the new objectives protecting cultural assets within the city and the need to grow these in tandem with population growth. One seeks additional text to Policy CU13 to ensure all of the Council area is included. One submission seeks that Policy CU15 refers to all streets with an annual audit. One submission seeks that all audits are required to have input from the community. Youth services are also raised. One submission seeks additional text to Policies CU18, CU20, CU29 and Objective CUO31 to include reference to making the city more family friendly and encourage non-licenced premises for evening activities/venues. One submission seeks the inclusion of a commitment to a new performing arts space within the canals (500+ capacity) to address the loss of venues in recent times.

One submission seeks additional text be added to Policy CU16 - temporary use for cultural provision; relating to recognition of rent free as a cash donation for the purposes of income tax rebates.

A number of submissions refer to Objective CUO21, some in support, some against the inclusion of a requirement for cultural/arts/community spaces in larger developments. Some in particular

seek a change in the threshold of 10,000 sq. m. and that specific reference is made to Large Scale Residential Developments (LSRDs). Some seek the policy include smaller sites within/adjacent to key urban villages. Others seek greater specificity on defining culture within this 5% requirement, and the conversion of the objective to a policy.

Some submissions point to the role of the development contribution scheme to cater for community and cultural use and the suggestion of a new local contribution scheme is made in one submission.

One submission raises the importance of consultation in preparing the Workspace Toolkit outlined in Objective CUO24 and taking into account the need of music creators.

Objective CUO26 is referred to in a number of submissions; with one seeking that the requirement is expanded to institutional land and that the community is acknowledged as a stakeholder and beneficiary of the property. Reference to tax incentives to encourage re-use of spaces for cultural uses is sought.

One submission queries why Objective CUO30 is limited to regeneration of industrial lands and not their existing use. In relation to Objective CUO32, some submissions seek to name additional types of cultural space, and refer to the type of leases held. Additional text on protecting residential amenity is proposed for Objective CUO34 in a number of submissions. One submission raised concerns with the Night Time Economy Taskforce Report in relation to cinema and a working group on noise pollution.

It is suggested in some submissions to include additional text to Objective CUO37- Street Art; requiring all buildings be required to use artists and that materials be reused.

Some submissions sought the provision of space for their particular cultural activity, due to the difficulties they are experiencing and suggest approaches from the UK experience.

Chief Executive's Response

Section 12.5.3 plus the associated new policies and objectives require the protection of existing cultural assets within the city and seek the delivery of new spaces as part of any larger regeneration project; as well as undertaking studies of individual areas of the city to identify shortfalls (Objective COU40). The provision and risk of overconcentration of hotels is addressed within this CE Report within the relevant chapter (see Chapter 6 and Chapter 15).

Policy CU13 in the use of the word 'city' refers to the City Council area - Dublin City, not the city centre; and, therefore, the change sought is not necessary. Policy CU15 promotes culture on side streets within the concept of compact urban growth and to encourage greater diversity of uses at street level. Side streets (i.e. just off/adjacent to more commercial driven streets) have greater potential as cultural uses on these streets are not competing with higher income tenants. The scale and frequency of audit suggested is high resource dependent and questionable in its benefit and is not appropriate for the Draft Plan.

The proposed additional text to Objective CU16 is inappropriate for a land use plan as it related to fiscal issues in which the Development Plan has no function.

The issue raised in relation to proposed changes to Policies CU18, CU20, CU29 and Objective CUO31 is addressed in the section on the night time economy under Policy CU22 which promotes the development of night time cultural infrastructure that accommodates a wider and

younger population to engage. It is recommended to include a reference to “family friendly” within this policy. Policy CU29 includes reference to making the public realm more attractive to families (whether night or day) and it is considered, therefore, the issue raised has been sufficiently incorporated into the Draft Plan. In relation to a performing arts space, the CE recommends to include mention of such in Policy CU12 as something to be appraised during the lifetime of the plan.

In relation to provision of cultural spaces; the Draft Plan seeks to address this issue in a number of ways - (i) protection of existing uses, (ii) large scale new development that increase the number of people within an area (whether working/visiting/living) must make provision for new cultural spaces; and (iii) working with the Arts office and other agencies to assess where needs new investment and bringing forward proposals to develop new civic and community arts facilities in the City. It is considered that a balance must be achieved and that placing a burden on smaller developments will not achieve viable cultural spaces; where other approaches which combine resources may result in a more viable, functional outcome.

The importance of not losing arts/culture space to community uses in Objective CUO22 is noted, and a footnote is recommended to ensure both uses are incorporated (or combined). The suggestion that all areas with rising population growth have masterplans is not appropriate as this issue of community need is addressed in Section 12.5.5 where Policy CU24 and Objectives CUO25, CUO40 and CUO41 all propose assessing and investing in communities where the need is identified. The audit process will involve input by the Arts Office; where there is not already a Council led audit in place for the relevant area. It is considered the design and templates of audits are best addressed outside of the development plan process in a guidance document. It is considered that Objective CUO22 is best as an objective as it targeted at the development management process. A number of new policies suggested are not considered appropriate for this section as they are statements.

The role of the contributions scheme has a place in the provision of public assets within the city but is not in any way the sole form of delivery of cultural and community facilities – many of which are a mix of public and private/social enterprise forms. Large scale redevelopments in excess of 10,000 sq. m. (which includes housing applications); have the scale and capacity to define their built form within the city. Such developments are shaping new communities and are required to play a role in making these new communities vibrant, sustainable locations through the provision of space for a range of local services, including culture. The audit process will inform the use of such spaces; whether the audit is completed by DCC or by the applicant. With the scale of increase in population (working or living) proposed by such schemes, it is not accepted that no cultural/community facilities may be required as such growth must be matched by investment in cultural infrastructure to ensure the city remains a liveable, attractive destination; which is of benefit to the developer and future owners of the scheme. It is recommended to ensure that large hotels, which specifically benefit from cultural investment, will also now be referenced in this objective. (See recommendation in relation to Section 12.5.4 as part of this response).

In relation to Objective CUO23, the list of uses is not intended to be exhaustive but as a reference to the type of places in question. It would be impractical to name every type of space within the objective. The referencing of lease types is not considered appropriate and not a planning issue. In the cultural audit undertaken to inform this chapter, the importance of music is referenced in the toolkit; and will form part of the requirements of future audits and toolkit documents. The detail of the consultation is not appropriate to include in the Draft Plan.

Objective CUO26 refers to all developments, regardless of zoning or type and, therefore, the additional text is not considered necessary. The points on beneficiary status and those relating to tax incentives are not a planning matter and are not appropriate to include in the Draft Plan. Youth are referred to in Objective CUO42, and also relevant to Objective CU20 which seeks to promote events that young people can attend and it is considered that this issue is sufficiently addressed in the Draft Plan.

In relation to the additional text to Objective CUO34, it is considered that Policy CCUV36, page 261, addresses the issue raised. It is recommended to put in a reference to Policy CCUV36 within this section of the Plan to ensure that this objective is cross-referenced in the Draft Plan. The additional text proposed for Objective CUO37 is considered too restrictive as developers may wish to use their hoarding for other purposes; and decisions on material used is not a strategic planning issue. The comments on the Taskforce Report are noted, and DCC are looking forward to working with the Department on any future working group.

In relation to industrial lands (Objective CUO30), this objective is led by a recognition that many industrial estates currently accommodate rehearsal/recording spaces and it is the Council's desire to ensure such spaces are not lost as part of future regeneration.

The particular challenge of certain cultural activities is recognised; however, the Draft Plan is not the appropriate policy document to resolve these - they will be brought to the attention of the Arts Office.

Chief Executive's Recommendation

Chapter 12

Section 12.5.3 Supporting Cultural Vibrancy in the City

Page: 448, New Objective subsequent numbering to be amended accordingly

Amendment:

{Objective CUO24- Performing Arts Venue

To undertake a feasibility study to assess the need for; and the possible form and scale of a new performing arts space (and ancillary spaces) within the inner city and the options for achieving successful implementation.}

Chapter 12

Section 12.5.3 Supporting Cultural Vibrancy in the City

Page: 453, Policy CU22 – Range of Cultural and Amenity Options

Amendment:

To seek and encourage a range of cultural and amenity options for residents and visitors within the city that are independent of licenced premises to allow options for younger people, **{families}** and others to engage and enjoy a range of activities in the city during evening hours.

Chapter 12

Section 12.5.3 Supporting Cultural Vibrancy in the City

Page: 448, Objective CUO22 – SDRAs and Large Scale Developments

Amendment:

Add footnote

{*Such developments shall incorporate both cultural/arts and community uses individually or in combination unless there is an evidence base to justify the 5% going to one sector.}

Chapter 12

Section 12.5.3 Supporting Cultural Vibrancy in the City

Page: 453, Objective CUO34 – Noise Impacts

Amendment:

{*See also Policy CCUV36}

Chapter 6

Section 6.5.6- Key Economic Sectors

Page: 232, Objective CEE29 – Event Venues

Amendment:

{*See also Objective CUO34}

Section 12.5.4 Supporting Key Cultural Activities

Summary

A number of submissions raise the real challenges facing artists regarding finding both affordable workspace, performance space, galleries and housing within the city and the benefit of supporting such spaces to the cultural life of the city. The importance of older industrial estates is referenced in providing such workspace. A number of submissions seeks reference to mews studios, back gardens and sheds as part of Objective CUO27. One submission seeks additional text to Objective CUO28 referencing a particular model for artist spaces (Community Land Trust). One seeks reference within Objective CUO32 – Audio-Visual Sector, to archiving of community historical records and a second seeks the inclusion of Dublin 7 in this objective. A number of submissions criticise the growth of hotels profiting from culture but in tandem developing on cultural spaces. Some submissions call for Objective CUO27 to include all forms of creative practitioners.

Additional text is also sought in one submission to Objectives CUO23 and CUO39; in relation to urban village cultural spaces and for laneways for art respectively. Support is given in a number of submissions for the objectives in relation to street art.

Support is expressed in some submissions for the inclusion of music within the chapter and they included support for a music hub in the city (Objective CUO3). Additional text is sought to Objective CUO35 to reference music. One submission raises the possibility of conflict between Objective CUO31 (music venues) and Policy CEE29 (national venues). One submission suggests the inclusion of policy to support the provision of a centrally located venue for dance music. The wide variety of music needs were also raised in a number of submissions. Some submissions raise the issue of noise and one seeks the inclusion of an “agent of change” to

address impacts of development on night time venues and others seeking stronger wording on prevention of noise from night time venues.

One submission raised the issue of access to key cultural venues, and the importance for performance/gig sets to be delivered on large HGVs to support cultural facilities; many of which are within the city core.

Chief Executive's Response

The pressure on workspace, especially those in older industrial space is recognised and for this reason, a number of policies and objectives are included in the Plan to address this issue including Objective CUO27- which seeks to develop new arts workspaces and re-use underused building for arts purposes; and Objectives CUO26 and CUO22 which seeks all largescale development and regeneration contribute to arts/culture space through undertaking an audit where necessary, and that 5% in all developments over 10,000 sq. m; and Objective CUO21 which requires older industrial estates (over 2 ha) to accommodate cultural uses. It is considered that the Draft Plan has addressed this issue in so far as is relevant to this process. It is recommended that Objective CUO27 should be expanded to include a wider range of arts and cultural spaces.

The provision of artist space as part of a mews development is a development management issue where such an application would be assessed on its merits; the Plan does not preclude such proposals and Policy CU15 encourages the use of quieter streets for cultural uses; including mews settings (See 15.13.5, page 716, for standards on mews development). Domestic artist studios in rear gardens are considered ancillary uses to the main use of the house as a domestic dwelling and are assessed on their merits; taking into account the zoning of the site and residential amenity.

In relation to Objective CUO28, it is not considered appropriate to reference particular examples as a range of approaches will be examined and the most appropriate to the context applied. The Cultural Infrastructure Study which informed the preparation of the Draft Plan has examined a number of examples within an Irish and international context; all of which will inform future decisions.

The issue of archiving historical community material is best addressed outside of the City Development Plan as part of a discussion with the City Archive. Whilst local community/civic arts spaces can play such a role; the level of specificity sought is inappropriate to the objective.

The additional text proposed for Policy CU23 is not necessary as the objective refers to all parts of the city; and Policy CU24 addresses the need to grow cultural facilities within urban villages. The additional text proposed to Objective CUO39 is not considered necessary as the "canvas" locations are not defined in scale and could include whole laneways where there was community support. The support expressed in a number of submissions for the objectives in relation to street art are noted.

The issue raised in relation to Policy CEE29 is addressed earlier in this report.

One submission suggests the inclusion of policy to support the provision of a centrally located venue for dance music. The points made in relation to referencing music is noted and a change is recommended to Objective CUO35 to ensure music is recognised as forming part of this objective; however it should be noted that art is defined on page 449 as including music and in

the interests of clarity, a note will be added to page 449 to clarify that all references to arts does include music.

In relation to the new hotels issue raised by a number of submissions and the benefit they gain from cultural offer in the city, it is recommended that their role in supporting culture is made more explicit and an amendment to objective CUO35 is proposed.

Page 450 references the wide mix and types of spaces needed for music, reflective of its diversity of spaces needed for all stages of artistic expression. It is agreed to include a reference to Dublin 7 in Objective CUO32 as an emerging cluster.

The issue of “agent of change” is a policy principle within UK legislation; (which is not yet proven to have a long-term positive impact^[1]) and is not established in either Irish guidelines or statute. However, the concept of requiring the applicant to address impact has been incorporated into the Draft Plan in Objective CUO34 which requires all applications next to established night time uses to demonstrate their development will not cause negative impacts in the future. The additional text sought on Objective CUO34 on noise is considered to be unnecessary as the issue is already sufficiently addressed in the objective.

In relation to access, it is recommended to include new text to highlight the need for access to be considered.

Chief Executive’s Recommendation

Chapter 12

Section 12.5.4 Supporting Key Cultural Activities

Page 449, additional text.

Amendment:

{*All references to artist/artistic means practitioners in all artistic disciplines.}

Chapter 12

Section 12.5.4 Supporting Key Cultural Activities

Page: 450, Objective CUO27- Artist Studios

Amendment:

Objective CUO27- Artist ~~(Studies)~~ {Workspaces}

To further develop and provide for artist ~~(studio)~~ {work} spaces {and spaces for creative production} within the city and avail of opportunities for utilising underused buildings within communities for artistic and cultural purposes.

Chapter 12

Section 12.5.4 Supporting Key Cultural Activities

Page: 452, Objective CUO32 Audio-Visual Sector

Amendment:

Objective CUO32 Audio-Visual Sector

To support the growth of the audio-visual sector within the city, and the continued growth of the existing clusters in D8 and D2 {and the emerging cluster in Dublin 7}, including encouraging start-up space provision.

Chapter 12

Section 12.5.4 Supporting Key Cultural Activities

Page: 453, Objective CUO35 Purpose Spaces for Evening and Night Time Activities

Amendment:

Objective CUO35 Purpose Spaces for Evening and Night Time Activities

To encourage the opportunity presented by new larger developments, {including a requirement for all large hotels*}; within the city to provide high quality designed for purpose spaces that can accommodate evening and night time activities, such as basement/roof level “black box” spaces that can be used for smaller scale performance/theatre {/music}/dance venues, and{/or} for flexibility in the design of larger spaces, such as conference spaces, to be adaptable for evening uses.

{*Over 100 bedrooms}

Chapter 12

Section 12.5.4 Supporting Key Cultural Activities

Page: 452 additional text inserted after ‘transport options’ as a new paragraph

Amendment:

{Also critical to the functioning of many larger cultural spaces is the maintenance of HGV delivery access of large sets/gig equipment; which needs to be taken into consideration for both applications for expansion by the venue and for proposed public realm projects immediately adjacent to such spaces.}

Section 12.5.5 Culture in the Community

Summary

The point is made in relation to Objective CUO41 that using buildings with heritage value for arts/cultural purposes is not always appropriate as the buildings may not be suitable as they place a high burden of maintenance on the cultural activities within. Support is expressed in a number of submissions for Policy CU24. One seeks additional text to Policy CU24 to refer to voluntary community involvement. A slight amendment is suggested to Policy CU25 to the language.

It is requested by one submission to list Ranelagh-Rathgar-Milltown as an area underprovided with cultural facilities and to recognise Phibsborough in other submissions.

A reference to performance space in Policy CU24 is sought by one submission. A change to Objective CUO40 is sought by one submission to recognise overlap of Electoral Areas in “mind-maps” and to add text to Objective CUO41 on economic rationale. Another seeks additional text to Objective CUO40 in relation to the development of the Arts Office website, and another seeks inclusion of music within the audit.

A number of submissions raised issues in relation to implementation of the objectives included in the Draft Plan and the funding of arts and culture initiatives, including websites.

Chief Executive's Response

The point on buildings not being suitable is recognised. However, the vast range of cultural uses that exist means that in some situations; they may be compatible and; through their local importance, can be focal point within a community. The objective does not seek to limit the provision of arts and culture space to such buildings; it specifies "buildings of merit"- i.e. of the quality necessary to the use. The management/use of new spaces is an operational issue and not appropriate for a land use plan. The inclusion of Ranelagh-Rathgar-Milltown is not recommended as the list is not exhaustive; just examples; and many other areas not named are also under provided. The Cultural Infrastructure Study did identify the Pembroke area (which encompasses much of the area named), and it is appropriately recognised in that document as needing investment.

Policy CU24 seeks to incorporate a wide range of uses in new civic arts and cultural spaces - where the most appropriate mix for any one location is informed by a cultural audit and/or co-design. It is not appropriate to specifically name one type of use for all settings, over and above other uses. The language change suggested to CU25 is recommended for inclusion.

Additional text to CUO31 is recommended to specifically reference dance. Additional text for CUO43 is recommended to keep the language in accordance with UNESCO wording.

The CE does not consider it appropriate to change Objective CUO40. With any study there needs to be a recognised boundary and the most appropriate scale for these studies is Electoral Areas. The studies will, as a matter of course, take into account adjoining areas and proximity of other facilities in developing its findings. In relation to the suggested new wording for Objective CUO40 in relation to music, a textual amendment is recommended to music in the objective.

The additional text suggested for Objective CUO41 is not considered necessary as the economic issue for each such proposal will be examined on its own merits. The additional text sought for Objective CUO43 is agreed and recommended for inclusion.

Decisions on investment in particular websites is not a land use issue and, therefore, not appropriate to the Development Plan. Implementation issues in relation to objectives are best addressed outside of the Development Plan process.

Chief Executive's Recommendation

Chapter 12

Section 12.5.5 Culture in the Community

Page: 451, Objective CUO31- Music Venues

Amendment:

Objective CUO31- Music Venues

To encourage the development of new music {and dance} venues {at accessible locations} that will provide opportunities for music artists to perform {and spaces for people to experience music} at a range of venue sizes.

Chapter 12
Section 12.5.5 Culture in the Community
Page: 457, Policy CU25- Libraries

Amendment:

Support the expansion and growth of libraries as key community and cultural assets within communities; including in providing key spaces for communities to use for cultural and arts events, music(,) classes, history and experiences and services to ~~(the unemployed)~~ {people experiencing unemployment} including job seeking skills and online learning and training.

Chapter 12
Section 12.5.5 Culture in the Community
Page: 457, Objective CUO40 – Cultural and Artistic Space Audit

Amendment:

Objective CUO40 – Cultural and Artistic Space Audit

To aim to undertake during the life of the development plan, an audit and implementation plan for each Electoral Area of the Council to assess the current and future needs with regard to cultural and artistic spaces, {(including music)} and to set a series of actions, policy tools, and initiatives to address identified shortfalls.

Chapter 12
Section 12.5.5 Culture in the Community
Page: 457, Objective CUO43 - Accessibility

Amendment:

Objective CUO43 – Accessibility

To encourage ~~(disabled)~~ people {of all abilities and ages} to take part fully in the city's culture as creators, artists, workers and consumers by supporting a high standard of accessibility in new and existing cultural assets.

Section 12.5.6 Supporting the Irish Language and Culture in the City

Summary

A number of submissions raised the issue of Irish language on signage, with some expressing support and some disagreeing with the objectives seeking Irish language only signage on new developments as being too culturally restrictive and seek rewording to “encourage”. One seeks a change to the layout of signs to put Irish in ordinary script and bold and English below in italics. A small number of submissions make detailed recommendations on changes to Policies CU26 and CU28 and Objectives CUO46, CUO49, CUO50, CUO51, CUO45, CUO52 to update the text in the documents referenced; put stronger emphasis on implementation; seek that the Council takes a role in school patronage with the community; be more specific on street names and clarify the proposed Gaeltacht Quarter. One submission seeks expansion of Objective CUO48 to all types of artistic and cultural spaces.

Chief Executive's Response

It is considered that the changes suggested in relation to the Gaeltacht Quarter provide a more up to date and clearer description and, therefore, these changes are recommended for inclusion in the Draft Plan. The proposed inclusion of a language plan in Policy CU26 is not considered to be a land use planning issue but more appropriate within other Council strategies or plans.

In relation to the suggestion on Objective CUO46, the Council works with the DES in their role but is not part of any decision-making process on patrons; and the changes suggested is, therefore, not supported as it is not a land use planning issue.

In relation to Objective CUO50- Naming of new developments; the Council considers that Irish language only names is not the most appropriate approach in assisting all to navigate the city and, therefore, recommends that this text is changed to bi-lingual rather than Irish only. The current wording of the objective is contradictory as it also states that signs must be bi-lingual. In seeking names that reflect the history of the location of the new development, a wholly Irish language name is not necessarily reflective of the diversity of historic names for particular locations; particularly in urban areas where names are based on particular trades and crafts; or from various historic migrations such as Viking and Norman. It is considered that a balance can be achieved to give priority to Irish language origin names whilst also recognising in some instances other historically relevant names may be more appropriate. A revised wording for the objective is proposed with the aim to achieve such an approach.

In relation to the request to include an objective requiring signs to be bi-lingual; this is not considered necessary as this is already a requirement. In relation to how signs are displayed, this is not considered to be a planning matter.

In relation to the rewording suggested for Objectives CUO45 and CUO52; it is considered that in combination, both already reference the creation of Irish Language Networks, one at Harcourt St. and the possibility of others across the city and, therefore, no change is necessary.

Objective CUO48 is specifically targeted at the traditional arts and culture. Policy CU13 and Objective CUO23 specifically address the need to protect all cultural spaces (for all types of uses) and it is, therefore, considered the issue raised is adequately addressed in the Draft Plan.

Chief Executive's Recommendation

Chapter 12

Section 12.5.6 Supporting the Irish Language and Culture in the City

Page: 459, Policy CU26- Irish Language

Amendment:

Policy CU26- Irish Language

To continue supporting Gaeilge as part of our identity and as a living language within the city and to ~~(explore options for promoting)~~ {promote} Irish language and culture through policy and actions.

Chapter 12

Section 12.5.6 Supporting the Irish Language and Culture in the City

Page: 460, Objective CUO50- Naming of new developments

Amendment:

Objective CUO50- Naming of New Developments

~~{To ensure that all new developments are named in the Irish language only, to}~~ redress the historic under-representation of Irish language names in the City; whilst also reflecting the rich diversity of history and origins of place names and townland names within Dublin and also names that are reflective of the social history of each place. All place names installed for new streets or estates must be bi-lingual.

{To ensure that all new developments are named to reflect the origins of place where the development is sited; with locally appropriate Irish names used in the first instance where available. This objective is to} redress the historic under-representation of Irish language names in the city; whilst also reflecting the rich diversity of history and origins of place names and townland names within Dublin and also names that are reflective of the social history of each place. All place names installed for new streets or estates must be bi-lingual {for all signage used}.

Chapter 12

Section 12.5.6 Supporting the Irish Language and Culture in the City

Page: 460, Objective CUO51- Dublin City Language and Cultural Hub

Amendment:

Objective CUO51- Dublin City Language and Cultural Hub

To promote and support the development of a flagship Dublin City Language and Cultural Hub {on Harcourt Street} as outlined in {the National Development Plan 2021-30 and} ~~(the)~~ Project Ireland 2040 ~~(document, Infheistínár dTeanga & inár nOidhreacht- Investing in our Culture, Language & Heritage 2018-2027.)~~

Section 12.5.7 Culture in the Public Domain

Summary

A number of submissions expressed support to the recent expansion of street art, particularly along the canals. One submission seeks a specific objective for Broadstone. One seeks an objective to establish a street art fund.

One submission seeks the inclusion of urban villages in Policies CU29 and CU30 and Objective CUO53. It also seeks that Objective CUO54 include reference to local use of development levies and some funds be allocated to the Percent For Arts Scheme.

Chief Executive's Response

The suggested additional text to Policy CU30 and Objective CUO53 is not supported as the phrase "city" refers to the entire Dublin City Council and the additional text is not needed. The suggested changes to Policy CU29 are supported and as this policy currently refers only to the city centre, textual amendments are recommended. The suggestion of a wider audit is not considered appropriate for this policy. The issue of a wider assessment of public realm is outlined in Section 7.5.8, page 261, of the Draft Plan and includes a range of policies and objectives regarding improving public realm; including Policy CCUV42 which specifically

addresses urban villages. Issues of funds in relation to public arts/street arts programmes are not a land use issues and, therefore, not appropriate for inclusion in the Draft Plan.

In relation to levies - their use is governed by the Development Contribution Scheme as adopted by the Council and it is not appropriate for the Development Plan to include text on their implementation. The Percent for Arts Scheme is an entirely separate initiative relating to spend on public infrastructure and the proposed text is not in keeping with the operation of that scheme.

Chief Executive's Recommendation

Chapter 12

Section 12.5.7 Culture in the Public Domain.

Page: 462, Policy CU29- Public Realm for Cultural Events

Amendment:

Policy CU29- Public Realm for Cultural Events

To encourage greater use of the public realm for cultural events to make the **{inner}** city **(centre)**, **{and urban villages}** more attractive to those with young families, and to seek provision of new public spaces for outdoor performance that are designed and fitted to host a range of events.

Other Issues Raised

A small number of submissions reference culture in relation to the zoning of Tolka Park. This issue is addressed under the Zoning Maps section of this report.

^[1] When Noise Annoys: Why the agent of change principles may not be having the expected impact; Sarah Clover, 27/12/2021, The Planner, RTPI.

Chapter 13: Strategic Development Regeneration Areas (SDRAs)

Chapter 13: Strategic Development Regeneration Areas (SDRAs)

Submission Number(s):

0299, 0333, 0362, 0408, 0434, 0451, 0499, 0594, 0606, 0636, 0673, 0678, 0726, 0746, 0747, 0748, 0749, 0750, 0805, 0832, 0836, 0886, 0887, 0888, 0923, 0926, 0946, 0950, 0973, 0979, 1011, 1015, 1034, 1035, 1040, 1042, 1048, 1068, 1076, 1077, 1090, 1093, 1095, 1096, 1098, 1109, 1130, 1148, 1158, 1179, 1192, 1222, 1266, 1272, 1278, 1279, 1288, 1298, 1300, 1304, 1310, 1318, 1320, 1321, 1337, 1341, 1347, 1377, 1383, 1386, 1389, 1399, 1404, 1413, 1421, 1448, 1449, 1450, 1452, 1459, 1462, 1466, 1477, 1480, 1481, 1482, 1496, 1497, 1501, 1504, 1511, 1527, 1529, 1531, 1532, 1541, 1553, 1557, 1568, 1574, 1576, 1577, 1580, 1587, 1588, 1592, 1594, 1595, 1599, 1610, 1617, 1619, 1636, 1642, 1644, 1645, 1646, 1651, 1655, 1656, 1659, 1660, 1666, 1667, 1674, 1677, 1682, 1687, 1689, 1700, 1701, 1704, 1705, 1717, 1720, 1723, 1729, 1732, 1737, 1738, 1740, 1744, 1749, 1750, 1751, 1753, 1760, 1762, 1764, 1770, 1772, 1773, 1775, 1777, 1784, 1785, 1787, 1789, 1790, 1793, 1794, 1795, 1807, 1808, 1810, 1815, 1816, 1820, 1823, 1827, 1849, 1850, 1858, 1863, 1872, 1874, 1875, 1886, 1887, 1959, 1971, 1972, 1973, 2094, 2096, 2105, 2106, 2111, 2114, 2115, 2117, 2120, 2121, 2133

Section 13.1 Introduction

Summary

A number of submissions were made relating to the specific requirements set out within the SDRAs and that the level of detail provided is too prescriptive and would prevent development progressing in some instances.

In addition, submissions were made requesting specific areas of the city including Clontarf Golf Club, Kylemore Road / Park West and Dublin Industrial Estate to be designated as new SDRA's. In these submissions, it was proposed that these lands were capable of delivering significant regeneration and strategic development opportunities and as such should be designated as new SDRA's.

Some submissions also called for the reinstatement of the National Concert Hall SDRA, Dublin 2 noting that significant regeneration potential still exists in the area and as such, the SDRA should be retained in the Draft Plan.

Chief Executive's Response

The guiding principles and accompanying maps are not intended to be prescriptive but rather set out a general development strategy and guideline for development in the area. It should be noted that any development within these lands will be subject to a planning application and detailed analysis throughout the planning process. The guiding principles and maps are intended to assist applicants in understanding the City Councils aspirations for the area and guide applicants through the planning process.

Minor deviations from the guiding principles and flexibility in the interpretation of the guiding principles maps will be applied providing the overall intent of the SDRA is met.

In respect of the Clontarf Golf Club, it is acknowledged that the site is located in a highly accessible area of the city, well served by quality public transport and local services in close proximity to the city centre. Whilst the strategic development of these lands would have the potential to provide for much needed housing in the city, the lands are not strictly necessary to

address the aim of the draft core strategy. However, the site currently provides for high quality amenities and facilities which support the 15 minute city concept and is, therefore, considered necessary to retain in the short term.

The strategic development of this site would require detailed planning analysis, master planning and stakeholder consultation given the significant scale of the site in order to deliver the most appropriate land use mix and development for the area. It is, therefore, considered that the designation of the site as an SDRA is premature pending further analysis of the area.

In relation to Kylemore Road / Park West, the City Council and South Dublin County Council are currently in the process of preparing a new Strategic Framework Plan for the Naas Rad, Ballymount and Park West area comprising of c. 700 hectares, "The City Edge Project". The vision for the area is to create a mixed use and climate resilient high density urban quarter of the city, where citizens will be able to access affordable homes, live close to where they work, in an area supported by outstanding public amenities and public transport services. Significant work remains to be completed, and as such, the designation of Kylemore Road / Park West as a new SDRA is premature pending the publication of the new framework plan for this area of the city.

The Draft Plan supports the future development of Glasnevin (the Dublin Industrial Estate and surrounding lands) as set out in page 69 of the Draft Plan. It is intended that, following feasibility studies and/ or the preparation of a Local Area Plan (or, if designated, a Strategic Development Zone) that these industrial lands will be brought forward as regeneration lands during the lifetime of the Development Plan.

CSO1 of the Draft Plan states that it is an objective of the City Council:

To prepare a feasibility study and a local statutory plan for the Z6 zoned lands at Glasnevin (Dublin Industrial Estate and environs) in consultation with the relevant stakeholders, including an infrastructural audit with costings and implementation strategy to enable sustainable regeneration and development.

As such, it is considered that designating the lands as an SDRA at this time is premature pending the feasibility study being carried out for the future development of the subject lands in accordance with objective CSO1.

In relation to the reinstatement of the National Concert Hall SDRA, it is considered that significant redevelopment has taken place in the area during the lifetime of the current Development Plan 2016-2022 that has transformed the area from an underutilised quarter to a thriving commercial centre and as such, the SDRA designation is no longer required to attract and support regeneration of the area. The majority of the sites within this SDRA have been redeveloped and significant improvements to the public realm have been implemented. The SDRA's as indicated in the Draft Plan have been subject to review and require significant investment to improve the overall quality of life in these locations and, therefore, it is the intent of the Draft Plan to focus and concentrate regeneration and seek the revitalisation of these areas.

Chief Executive's Recommendation

It is recommended not to include new SDRAs at this time as it is premature pending further analysis and master planning.

Amendment:

The guiding principles plans are not intended to be prescriptive, but seek to set out an overall strategy for each site in terms of the appropriate form and scale of development, key routes and permeability, open space etc. ~~(Minor deviations from the guiding principles map may be acceptable)~~ {Some flexibility in the interpretation of the guiding principles maps will be applied} where the applicant can demonstrate that the overall intent of the guiding principles has been incorporated and considered and that an appropriate development response for the site has been developed.

Section 13.2 Overarching Principles

Summary

A number of submissions seek greater clarity on the terminology used within the guiding principles maps associated with each SDRA. Specific requests include clarifying the difference between “Permeability Intervention” and “Greening, Cycling and Pedestrian Corridor”.

Chief Executive’s Response

The Chief Executive acknowledges that further clarification would be helpful on the terminology used within the guiding principles maps. Overarching Principles are set out in Section 13.2 which detail the core objectives of the SDRA’s. In response to the OPR submission, the CE recommends that this section of the plan be given further weight to include an objective, SDRA01 “To support the ongoing redevelopment and regeneration of the SDRA’s in accordance with the guiding principles and associated map; the qualitative and quantitative development management standards set out in Chapter 15; and in line with the following overarching principles”. Access and Permeability is identified as a specific guiding principle which supports permeability and connectivity within the SDRA to surrounding neighbourhoods and public transport infrastructure through the provision of high quality, accessible public realm, high quality walking and cycling infrastructure and access points in accordance with DMURS. “Permeability Interventions” and “Greening, Cycling and Pedestrian Corridors” were derived from this overarching principle.

To improve the understanding specifically between “Permeability Interventions” and “Greening, Cycling and Pedestrian corridors”, it is proposed to omit reference to both from the guiding principles maps and consolidate into one coherent “Access and Permeability Corridor” in line with the naming of the overarching principle. Consolidating the naming of these two guiding principles provides greater clarity to the overall intent of these routes as shown on the SDRA maps.

Chief Executive’s Recommendation

It is recommended that all SDRA maps are amended as follows:

~~(“Permeability Interventions” and “Greening, Cycle and Pedestrian Corridors”)~~
{ “Access and Permeability Corridor” }

The symbols are amended accordingly.

Section 13.3 – SDRA 1 Clongriffin / Belmayne and Environs

Summary

A submission was received requesting that St. Michael's Cottages located at Hole in the Wall Road be specifically identified for residential development in the SDRA text and associated map.

Other submissions were made in respect of the KUV boundary for the Clongriffin / Belmayne area and the impact on sites now omitted from the KUV.

Chief Executive's Response

St. Michaels Cottages are a group of individual residential units located on the west side of the Hole in the Wall Road. The SDRA guiding principles map does not detail specific land uses within the Clongriffin / Belmayne area but instead identifies key development areas, local centres, key infrastructure and open spaces to support the general guiding principles for the area to assist in the comprehensive regeneration / development of the SDRA lands in accordance with the LAP. Zoning Map C identifies the specific land uses within the SDRA area and details of the permissible and open for consideration uses are set out in Chapter 14 of the Plan. St. Michael's Cottages are zoned Z14, with the objective "To seek the social, economic and physical development and/or regeneration of an area with mixed use, of which residential would be the predominant use". The existing residential use of these properties is supported under the Z14 zoning.

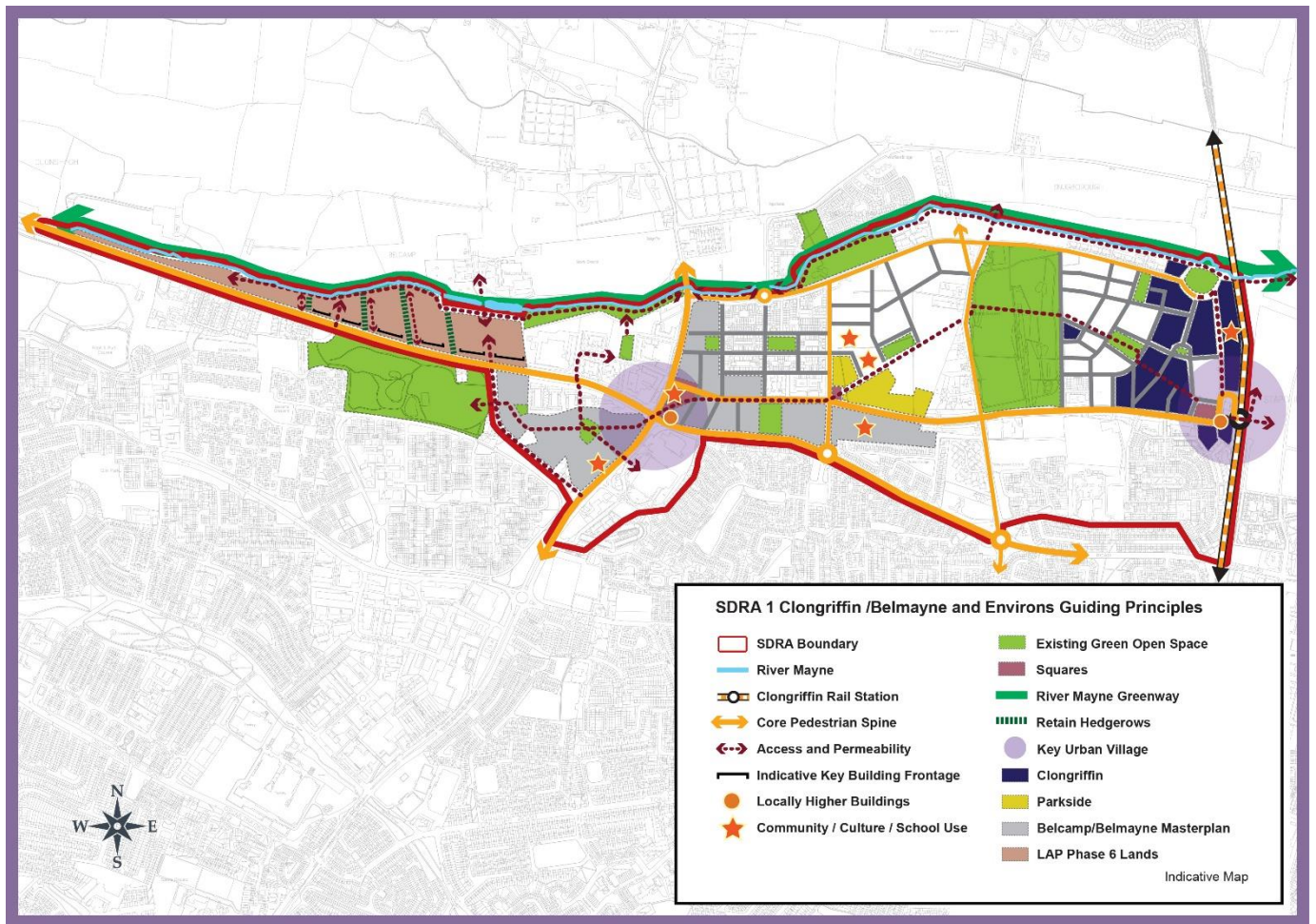
As such, given the intent of the SDRA map and the overarching guiding principles which set out general objectives for the overall development of the area, it is considered that specifically identifying and detailing residential land use for lands at St. Michaels's Cottages would be inconsistent with the overall objective for the SDRA. The zoning map and associated land use objectives adequately sets out the details for permissible development on the subject lands.

The KUV has been refined based on the existing development in the area and the realistic expansion of these uses. It was considered that the extent of the KUV as identified in the 2016 – 2022 Development Plan was too ambitious given the level of development that has taken place to date and potential to dilute the synergies of the KUV. The Development Plan review indicated the need to reduce and consolidate the KUV in the Draft Plan to create a more intensive urban centre and to avoid ad hoc delivery of local services.

Notwithstanding the reduced KUV boundary, the land use zoning of the sites outside the KUV remain unchanged. Development can, therefore, still be considered on these sites in accordance with the land use zoning objective.

Chief Executive's Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily responds to issues raised.



Section 13.5 SDRA 3 – Finglas Village Environs and Jamestown Lands

Summary

A number of submissions were made in respect of the significant development potential within Finglas Village and Jamestown Lands. Many submissions highlight that the heights and densities proposed for these lands (in Variation 33 of the current City Development Plan) are too low and that greater intensification of development is needed.

Submissions also note the land use mix attributed to the Jamestown lands and suggest that the mix between residential and commercial uses should be reconsidered to increase the residential to commercial ratio. Some submissions note that the land use mix should be reversed to allow for 70% residential, 20% commercial and 10% community / cultural uses within the Jamestown area on the basis that commercial development is not feasible and that residential would be more appropriate having regard to the proximity of the Luas. Other submissions noted that the combination of commercial / industrial uses alongside residential development is not compatible and careful consideration is needed as to how new proposed uses will integrate in with existing industrial activities in the area.

A number of submissions also highlight the need to produce a masterplan for the Jamestown area for agreement with the City Council prior to the commencement of works on site is unviable and would cause significant delays in the development of the area. The submissions note that the preparation of a masterplan in combination with other landowners would be lengthy and that the delivery of “ready to go” sites would be hindered in the short term. A request to omit the requirement to agree a masterplan and produce a HNDA was submitted.

A site specific submission was made in relation to the Iceland Site and Raven House / Town Centre Site. The submissions identified a mapping error in the SDRA Guiding Principles maps as to the outline of these sites and sought clarification that the proposed new public realm area would not impact on the development potential of the sites and will not restrict traffic movements as to prohibit access to the sites. Other submissions were in support of the new public realm identified and requested significant improvements to the quality of the spaces be carried out.

Chief Executive’s Response

The SDRA for Finglas Village Environs and Jamestown lands follows the principles of the recently adopted variation of the current Dublin City Development Plan 2016-2022. The variation identified the strategic location of the Jamestown lands being inside the M50 and adjacent to the proposed Luas extension to Finglas. The area represents a well-connected, underutilised employment brownfield lands within the built up area of the city that has the potential to allow for more varied and intense mixed uses. The SDRA builds upon the guiding principles set out in the variation and extends to include Finglas village and environs.

The variation adopted in 2020, was subject to detailed analysis of the area in relation to land use mix, infrastructure provision and capacity, building height and urban form to ensure that future development of the lands occurs in a coordinated and sustainable manner that can act as a catalyst to regenerate the village. The guiding principles in respect of the future development of the SDRA have been informed by this detailed analysis and are considered to be appropriately upheld in the Draft Plan. The CE however, recommends a textual amendment to provide a greater degree of flexibility,

In relation to the requirement for a Masterplan to be prepared jointly by the landowners and agreed with the City Council prior to development taking place on site, it is considered appropriate having regard to the scale of SDRA lands, the strategic location and the ability to provide for significant mixed use development, to ensure a coordinated phased development approach is carried out.

In response to the requirement for a HNDA to be prepared for the area, it is considered that having regard to the significant scale of the lands and the quantum of residential development that can be facilitated, the requirement for a HNDA to set an appropriate unit mix for the area is warranted.

The Chief Executive acknowledges the site specific submission in relation to the mapping of the site boundaries and recommends that the SDRA map be revised to include the entire development site. The improvement to the public realm is considered appropriate to enhance the overall quality of the area. The public realm improvements will be largely confined to the publicly owned lands, however additional public open space and public realm improvements requirements may emerge at the site design stage in accordance with the requirements for open space set out in Chapter 15, Section 15.6.12 and 15.8.6.

Similarly, in relation to traffic impacts, detailed traffic analysis will be required as part of any future planning application in the area which will set out appropriate car parking and traffic management strategies for the area in accordance with Table 15-1 of the Draft Plan.

Chief Executive's Recommendation

Amendments to Figure 13-3 are recommended to include the full extent of the sites at Iceland and Raven House. Mapping changes will be specifically addressed in Volume 2 of the CE Report.

Chapter 13

Section: 13.5 SDRA 13 – Finglas Village Environs and Jamestown Lands

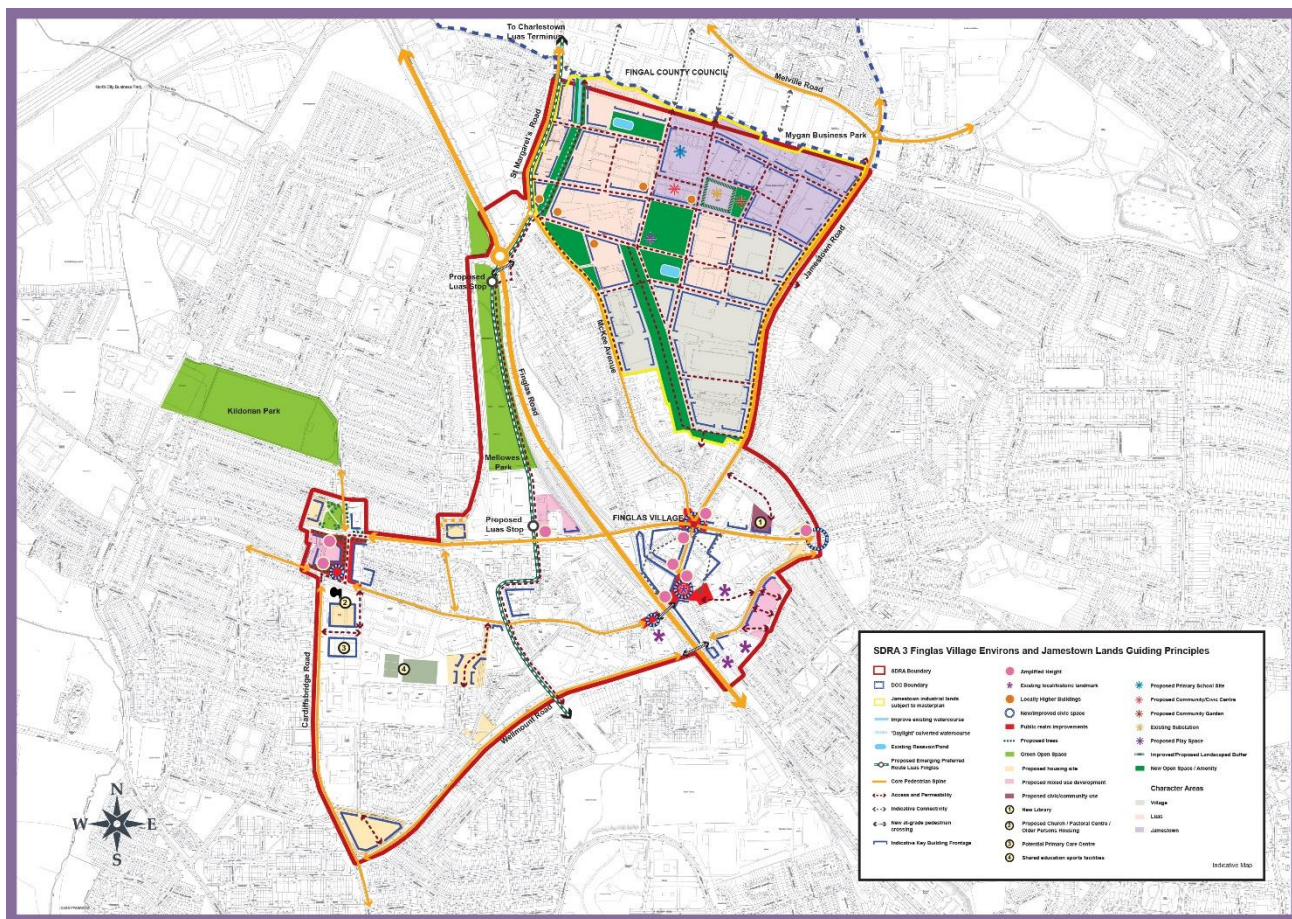
B: Jamestown Lands

Page: 489

Amendment:

Guiding Principles for the Jamestown Lands
Land Use & Activity

Note: deviations in use mix and in relation to density ranges ~~(of up to 10%)~~ within individual sites and quarters to meet design requirements {will be open for consideration during the Masterplan preparation process}, and accepted if the change supports overall compliance with the guiding principles, and where a joint agreement is proposed between landowners to accommodate certain uses within a particular area, such will be considered where the overall principles are retained and the use and typology is delivered.



Section 13.6 SDRA 4 – Park West / Cherry Orchard

Summary

A submission was made in respect of Opportunity Sites 4 and 5 in support of the guiding principles set out which are consistent with the LAP for the area.

One submissions also requested that a definition be included of the upcoming City Edge Project in the SDRA.

Chief Executive's Response

The CE welcomes the submission in support of the SDRA. With regard to reference to the City Edge Project, it is considered, in the interest of clarity that a brief description and vision for the City Edge Project be included in the introduction of SDRA 4.

Chief Executive's Recommendation

It is recommended that a definition of the City Edge Project be included in the introduction of the SDRA.

Chapter 13

Section: 13.6

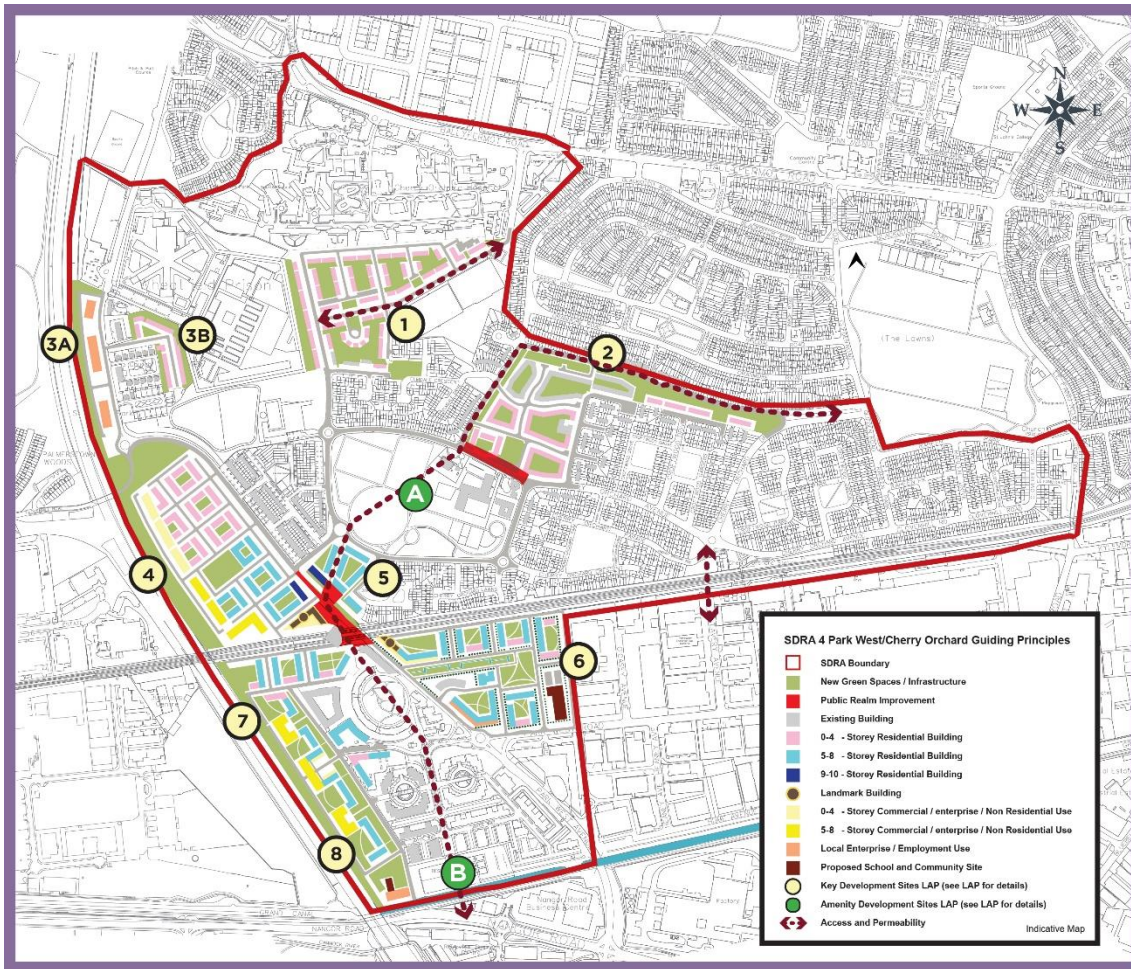
Introduction

Page: 494 – 3rd paragraph

Amendment:

Eight key development sites are identified with the capacity to deliver in the order of 2,500 – 3,100 new residential units alongside new employment and retail opportunities, with higher densities focused on the railway station which is planned to be upgraded to an electrified DART line. The plan also supports the delivery of two key amenity sites at Cherry Orchard Park and Gallanstown Waterworks, linked via a strategic green infrastructure network.

{It should be noted that the SDRA lands adjoin part of the City Edge Project to the south. Dublin City Council together with South Dublin County Council are currently in the process of preparing “The City Edge Project” funded under the Urban Regeneration and Development Fund (URDF) programme which is a new Strategic Framework Plan for the Naas Road, Ballymount and Park West area comprising of c. 700 hectares, and it is important that the two designated areas mutually benefit each other.}



Section 13.7 SDRA 5 – Naas Road

Summary

A submission was made in respect of the MDL site located within the SDRA. The submission sought increased heights and densities within the site and a number of specific amendments relating to the guiding principles. It was submitted that the locally higher building located at the junction of the Long Mile Road and Walkinstown Avenue to the south east of the site be increased to a landmark building and a new locally higher building be identified on the north east corner of the site at the junction with Naas Road and Walkinstown Avenue. The submission also requested that the detail of the protected structure be mentioned in the guiding principles to clarify that just the front main building of the existing structure is protected. Reference to the retention of trees to the south of the site was also sought to be omitted.

It was also requested that an additional Guiding Principle be inserted in relation to clarification of the land use and the requirement for a masterplan to be prepared for all development sites to ensure consistency with the Development Plan objectives and that new development and extant permissions can be delivered in the short term having regard to the upcoming expiry of the LAP.

A site specific submission was made in respect of Opportunity Site 3 – Former Nissan site which requested flexibility in the heights set out in the guiding principles subject to compliance with the performance criteria as set out in Appendix 3.

In addition, the submission noted the guiding principle for new pedestrian crossings across the Naas Road and Walkinstown Avenue and requested that the permitted crossings in relation to Opportunity Site 3 be acknowledged.

In relation to the KUV, a number of submissions were made seeking an amendment to the boundary of the KUV to either remove or include specific sites.

Submissions were also made in respect of rezoning of a number of Z6 sites located between the Old Naas Road and the Naas Road.

Chief Executive's Response

In response to the rezoning submissions, the Chief Executive supports the regeneration of the area and zoning proposals from Z6 to Z14 and as a result recommends an amendment to the SDRA Guiding Principles for the area and the inclusion of a new opportunity site. The Guiding Principles for these lands have been prepared for any future development of the lands in the short term having regard to the future vision of the City Edge Development Framework, until such time that the Framework Plan has been adopted. The site specific rezoning submissions are discussed in detail in Volume 2 of this report.

The KUV boundary has been reviewed in the context of the submissions made. It is recommended that the KUV boundary includes the four main sites within the SDRA, (MDL, Royal Liver, Former Nissan Site and Naas Road Industrial Estate / Brooks Timber Yard) and lands immediately fronting the Naas Road that currently provide for a mix of commercial uses and local retail. The proposed extent of the KUV seeks to consolidate the intensity of development and to create a vibrant and active frontage along the core Naas Road spine.

It is noted that the boundary of the KUV shown on the SDRA map and Map K differ slightly. The boundary as shown on Map K is correct, and designates a core radius between the three key

sites in the SDRAs as the KUV area. As such, to avoid confusion, it is recommended that the KUV boundary be omitted from the SDRAs map and shown only on Map K.

In relation to the request to clarify the standing of the guiding principles, noting the upcoming expiry of the LAP, the SDRAs have been prepared having regard to the upcoming expiry of the LAP and the forthcoming City Edge Project. It is proposed to amend the SDRAs map in this regard.

In relation to the MDL site, it is considered that the specific requests for increased height within the sites can be accommodated having regard to the surrounding pattern of development. It is recommended that a locally higher building be proposed on the north east corner of the site to tie in with the permitted urban form and building heights to address the Naas Road, Walkinstown Avenue and Kylemore Road crossroad junction. The provision of a locally higher building at this location will frame the core junction within the SDRAs and create a focal point through the trio of taller buildings. The design and relationship of the proposed locally higher building should have regard to the protected structure and ensure that the setting and character of the existing building is respected and enhanced.

In response to the designation of the protected structure, the SDRAs aligns with the designation of the protected structure as set out in the RPS. Any future development of the protected structure must comply with the relevant standards for protected buildings as set out in Chapter 11 and Chapter 15 of the Draft Plan.

In relation to the provision of active frontage along Walkinstown Avenue, it is noted that this stretch of road will be subject to increased vehicular movements with the provision of the BusConnects corridor. However, it is considered necessary to retain the objective for ground floor activation to improve the quality of the pedestrian environment and mitigate against the dominance of vehicular movements. The Chief Executive has no objection to also providing active frontage through the site in the future redevelopment of the lands.

Lastly, in relation to the guiding principle to retain the existing trees in the south of the MDL site, it is considered that in accordance with objective GI42 to support greening of the city that the retention of trees is appropriate. Any removal of unhealthy or unsafe trees can be facilitated through the submission of a detailed tree report to justify their safe removal at the planning application stage.

With regard to the site specific submission on opportunity site 3 – former Nissan Site, it is recognised that there is an extant permission on the site and the SDRAs have been prepared to be cognisant of such. It is noted that there may be some inconsistencies between the permitted development and guiding principles for the site, however as noted in the introduction, the SDRAs maps are indicative and variations and flexibility may be sought subject to meeting the overall objective for the site. It is considered that the extant permission adequately responds to the overall intent of the guiding principles in this respect. As such, no change to the SDRAs is required.

Chief Executive's Recommendation

Chapter 13

Section: 13.7

Introduction

Page: 499-500

Amendment:

A Local Area Plan (LAP) for the Naas Road lands was adopted by the City Council on 14 January 2013. The plan was extended for a further 5 years in 2018 and will expire in January 2023. The plan area covers approximately 100 hectares and contains a number of major brownfield sites. It occupies a strategic location on a gateway point into the city with good public transportation links to the wider metropolitan area. {Dublin City Council together with South Dublin County Council are currently in the process of preparing “The City Edge Project” funded under the Urban Regeneration and Development Fund (URDF) programme which is a new Strategic Framework Plan for the Naas Rad, Ballymount and Park West area comprising of c. 700 hectares. The vision for the area is to create a mixed use and climate resilient high density urban quarter of the city, where citizens will be able to access affordable homes, live close to where they work, in an area home to outstanding public amenities and public transport services. The City Edge project will inform a new Statutory Plan to be prepared for this area over the life of the Development Plan.}

The Naas Road SDRA sets out guiding principles for the development of lands within the current Naas Road LAP area and part of the future City Edge project. The guiding principles are in place to support development in the area pending the finalisation of the City Edge Project and Statutory Plan for the area. }

~~(The overall vision for this area set out in the 2013 LAP is as follows:~~

~~‘To create a great place to work and live, and create a new urban identity for the Naas Road lands area plan by regenerating existing developed lands as a sustainable mixed-use area, capitalising on the area’s locational advantages and improving the relationship of the lands to their immediate surroundings through improved linkages, green infrastructure and permeability. As part of this transformation, there will be an increase in the range of land-uses, and improvements in the visual environment, resulting in an increase in street level activity and the general revitalisation of the area.’)~~

The {SDRA} ~~(plan)~~ contains ~~(three)~~ {six} remaining key re-development sites, namely:

- Royal Liver Retail Park
- Motor Distributors Ltd site (Volkswagen factory)
- Nissan plant site
- {Bluebell Avenue
- Former Irish Water and Bluebell Road Regeneration Area
- Nass Road Industrial Estate and surrounding lands}

Linking the re-development of these sites into the wider surrounding environment, and creating sustainable successful communities is central to the successful regeneration of this SDRA.

~~(It should be noted that since the adoption of the LAP, there have been changes in the national planning context via the introduction of Ministerial Guidelines relating to height and apartment standards.)~~ {Some of} the key sites identified in the area have been the subject of planning activity in recent years, with permission for c.3,000 units in the vicinity of the Naas Road/Kylemore Road junction. {The SDRA seeks to continue to support the redevelopment of the opportunity sites for mixed use development in the short term pending the adoption of a new LAP for the area.}

~~(It is also noted that the wider Naas Road lands area, incorporating parts of Park West and lands in South Dublin County Council, are the subject of a masterplanning process funded under the Urban Regeneration and Development Fund (URDF) programme. It is anticipated that this will result in a wider statutory plan coming forward that will supersede the LAP in the coming years, and may, if appropriate, inform a variation to the development plan.)~~

Chapter 13
Section: 13.7
Guiding Principles for Key Opportunity Sites
Page: 500

Amendment:

The Naas Road LAP provides guidance in relation to the development of the key opportunity sites 1-~~(5)~~ {six} below, of which the key site specific issues updated and summarised below with said objectives being part of this SDRA going forward.

1 – Royal Liver

- To encourage the sustainable redevelopment of this key site as part of the mixed-use core of the Key Urban Village containing ~~(mainly)~~ office and residential uses with local scale retail and service uses. To provide for a boulevard leading to a pocket park and pedestrian and cycling connections through the site to increase connectivity and deliver the green infrastructure network. ~~(of the LAP)~~

Chapter 13
Section: 13.7
Guiding Principles for Key Opportunity Sites
Page: 500, 2. Motor Distribution Site

Amendment:

- Facilitate the sustainable redevelopment of this key site with a fine urban grain and a mix of uses as part of the mixed-use core of the Key Urban Village all at sustainable densities within a vibrant and interesting environment and integrating with the wider plan area and the administrative area of South Dublin County Council directly adjoining {and aligning with the City Edge Project when adopted.}
- Require a general height of between 6 and 8 storeys fronting onto Walkinstown Avenue, Longmile Road, Robinhood Road. There is potential for one to two mid -rise buildings (up to 50m) within the site. ~~(but any development in the immediate vicinity of the protected structure should protect the special character of the protected structure and its setting.)~~

The height of new development along Naas Road, directly adjacent to the protected structure, should protect {its} ~~(the)~~ special character {and its setting} ~~(of the protected structure, and should be no more than 4 storeys in height immediately proximate to the building.)~~

Chapter 13
Section: 13.7
Guiding Principles for Key Opportunity Sites
Page: 504 last paragraph

Amendment:

~~(Two areas have been added to the SDRA boundary that are outside the LAP boundary and are indicated on the accompanying figure.)~~

Chapter 13

Section: 13.7

Guiding Principles for Key Opportunity Sites

Page: 505 addition

Amendment:

{6 – Naas Road Industrial Estate and Surrounding Lands.

These lands currently comprise of existing industrial / warehouse units bound by the Old Naas Road to the north and the Naas Road to the south. The lands also include a protected structure (RPS Ref. 5793) located on the eastern portion of the site at the junction of the Old Naas Road and Naas Road.

The regeneration of these lands shall be subject to the preparation of a Masterplan to ensure an appropriate mix of uses and a development strategy to guide future development. The Masterplan shall have regard to the vision for the City Edge Project and any future statutory plan. Any future development should also ensure the character and setting of the protected structure is safeguarded. The provision of open space and green infrastructure along the route of the Camac shall also be safeguarded and provided for in the Masterplan.}

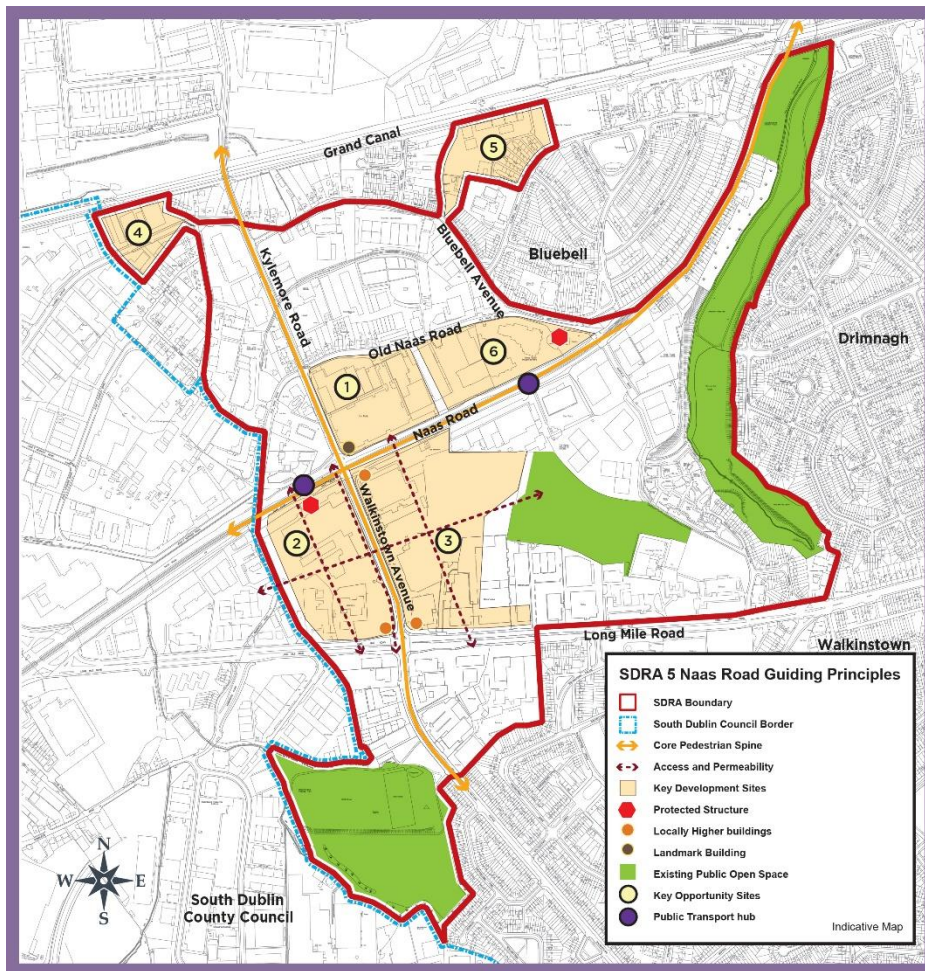
Chapter 13

Section: 13.7

Page: 506 Figure 13.5

Amendment:

Remove KUV boundary from SDRA Map and include new key opportunity site for Naas Road Industrial Estate and Surrounding Lands.



Section 13.8 SDRA 6 Docklands

Summary

A number of submissions received on the Docklands SDRA related to height and density. It was noted that the heights proposed within the SDRA are not ambitious enough and fail to address the need for height within the SDZ's. It was submitted that restricting heights within the SDRA reduces development potential and encourages monolithic built form.

Submissions also state that there is an imbalance between commercial and residential development within the SDRA and greater emphasis on the provision of homes is needed. It was highlighted that the existing commercial provision accommodates c. 50,000 employees in the SDRA area but not enough homes in the area to support this quantum of population.

Calls for the relocation of Dublin Port, greater emphasis on public transport policy, the identification of a landmark building on the Tara Street Station site, greater emphasis on expansion of marina-based activities and issues with the restrictive nature of the boundary with SDRA6 and SDRA 10 were also submitted.

A number of submissions were also made in relation to specific site guiding principles within the Docklands area including Opportunity Sites 5, 7, 11 and 14. A request for rezoning of Shelbourne Stadium was also received which sought the designation of the lands as an additional opportunity site within the Docklands area with site specific guiding principles including locally higher buildings, open space and connection points onto the River Dodder. Eastpoint Business Park was also requested as an opportunity site.

Opportunity Site 1 – Connolly Station

A submission required that the requirement for a Masterplan for the entire site be omitted as recent applications on the site have overtaken any necessity for a Masterplan for the entire site.

The guiding principles in relation to an 'access, servicing and parking strategy' were also queried. It was noted that car parking at this and other railway stations is essential for the operation of the railway, particularly key staff and customer parking.

It was also requested that any designation or consideration for Connolly under the Development Plan would not preclude any development in furtherance of public transport operations, include the Dart+ proposals.

Submissions also called for greater emphasis and importance to be given to the historic importance of Connolly Station.

Opportunity Site 3 - Shamrock Place

It was submitted that the lands bounded by North Strand Road and Guildford Place are denoted as Proposed / Improved Public Open Space in their entirety but a portion of this area has a residential zoning and this inconsistency should be clarified. It was also considered that the potential exists for a locally higher residential building to mark this significant road, waterway and cycleway junction. As such, the residential potential, as expressed in the overall City District zoning, should be replicated within the SDRA designation.

Opportunity Site 5 – Coady’s Yard

A submission was made in respect of the specific development details set out for Coady’s Yard. The submission requested more flexibility in the development approach taken with reference to own door access and road widening be omitted due to level differences within the site. The submission also sought the provision of a locally higher building within the site.

Opportunity Site 7 – Docklands Innovation Park

Two submissions were made in respect of the proposed built form of opportunity site 7. It was submitted that the proposed layout of the site is unsuitable due to specific site constraints relating to wayleaves and, therefore, it was requested that flexibility be applied in the design of future developments. A locally higher building on the site was also requested. Suggestions regarding the permeability interventions and location of the public open space were also set out within the submissions.

Opportunity Site 11 – Trinity College Innovation District

A submission was made seeking amendments to the guiding principles to reflect more accurately the overall vision planned for the site. Increased heights and flexibility with regard to the preparation of a masterplan were also requested.

Opportunity Site 14 – Former Power Station and Pigeon House Hotel, Poolbeg

A submission was made requesting that residential development be considered on the subject site.

Chief Executive’s Response

With regard to height within Strategic Development Zones, the relevant provisions are set out under Section IX of the Planning and Development Act 2000 as amended. Under section 168(2)(c), it is stated that the scheme should set out proposals in relation to the overall design of development, including the maximum heights. In this regard, the Development Plan cannot circumvent the provisions of the Planning Act in relation to building height thresholds in an SDZ scheme.

In relation to building heights outside the SDZ areas, the CE’s detailed response to submissions relating to height are set out under Appendix 3. It is considered that the building height strategy sets out a balanced and measured approach to the promotion of appropriate height and density in the city in accordance with The Urban Development and Building Height Guidelines for Planning Authorities.

In response to submissions relating to land use mix, as with height, land use within the SDZ area is required to be set out under section 168(2)(c), as such the SDRA cannot override the SDZ in this regard. In respect of lands outside the SDZ, all sites within the SDRA are subject to land use zoning, the breakdown of uses within each site will be provided in line with the permissible and open for consideration uses as set out in Chapter 14 of the Draft Plan.

In relation to the relocation of Dublin Port and the re-use of the lands, given the strategic importance of Dublin Port to the city and region, it is the view of the CE that it is fully appropriate for the City Council to continue to support the operations of the port in accordance with the National Planning Framework and the Dublin Port Company Masterplan 2040, as set out under

Policy CEE35 in Chapter 6. It is also the recommendation of the CE to support the expansion of marina and water based activities in the Docklands area in accordance with Objective GIO34.

In response to the request to include Tara Street as a landmark building, given the recent expiry of the George's Quay LAP, it is considered appropriate to identify the landmark and locally higher buildings previously supported under the principles of the Georges Quay LAP.

In relation to the site specific submissions, the CE recommends amending some of the guiding principles in order to provide flexibility in the regeneration of the lands to support the wider development objectives for the area.

With regard to Connolly Station, it is recognised that there is an extant permission on the site and the SDRA has been prepared cognisant of such. It is noted that there may be some inconsistencies between the permitted development and guiding principles for the site, however as noted in the introduction, the SDRA maps are indicative and variations and flexibility may be sought subject to meeting the overall objective for the site. Notwithstanding the above, it is noted that the text of the SDRA identifies the potential for landmark building/s on the site and as such it is recommended that the SDRA Map be amended to reflect this. With regard to the building itself and its continued operation, the CE acknowledges that the station building remains in operation and the SDRA is not intended to restrict any future infrastructural plans in this respect. The CE also acknowledges the historic importance of the building, and its inclusion in the RPS (Ref: 130) and recommends greater emphasis be placed on its protection in any future development of the area within the SDRA.

In response to the submission on Shamrock Place – Opportunity Site 3, it should be noted that the proposed public open space corresponds with the Z9 zoning as indicated on Map E. The public open space lands are landlocked between railway lines and the Royal Canal. A new pedestrian bridge has been recently provided at this location to create a walkways along the Canal frontage. The provision of open space at this location seeks to further enhance this amenity area to improve the overall green infrastructure in the area in accordance with Chapter 10 of the Development Plan. The north western section of the lands are zoned Z1, this area corresponds with the built form and locally higher building indicated on the site as per the SDRA Guiding Principles Map.

It is considered that flexibility in relation to the provision of own door units should be provided at Cody's Yard. It is recognised that there are specific site constraints at this location and, therefore, it is suggested that there is an aspiration to provide for own door units where it is feasible to do so. In relation to the widening of the road way, it is considered necessary to retain this objective in the SDRA as the existing pedestrian and cycle environment is poor and extremely narrow in places. In this respect, it is considered appropriate for any new development of the site to assist in improving the public realm at this location. With regard to height, the site is not situated in a location within the SDRA that would merit the provision of a locally higher building in the context of the assessment criteria as set out in Appendix 3.

In relation to the Docklands Innovation Park, Opportunity Site 7, the requests for greater height are already supported in the SDRA with the identification of two locally higher buildings on the site. In respect of the site layout, permeability interventions and specific site constraints noted in the submission, as previously mentioned in the introduction, the SDRA maps are indicative and flexibility will be applied to the guiding principles subject to delivering upon the overall intent of the SDRA. In this regard, a case can be made for deviations from the layouts indicated through the planning application process.

The significant potential of opportunity Site 11 – Trinity College District is acknowledged and the CE is fully supportive of expanding the guiding principles to include teaching, research, collaboration, enterprise and support facilities to assist in the delivery of future plans of the university. As such, it is recommended that the guiding principles be amended to facilitate a greater element of flexibility in the delivery of education and associated uses on the site.

With regard to Opportunity Site 14 – Former Pigeon House Hotel, the site has been reviewed in the context of flooding, and nearby large utility providers and it is concluded that residential development would not be supported in this context. Please refer to site specific flood risk assessment, Volume 7 of the Draft Plan for further details.

Following the proposed rezoning of Shelbourne Stadium, it is recommended that given the scale of the site and the significant regeneration potential, that a new opportunity site be included within the SDRA. The guiding principles set out the key aspects of development sought to be delivered, subject to a Masterplan being prepared for the area.

In relation to Eastpoint Business Park, please refer to the site-specific rezoning response set out in Volume 2 of the CE Report.

Chief Executive's Recommendation

Chapter 13

Section:13.8 SDRA 6 – Docklands

Page: 512 Green Infrastructure

Add to the list of Green Infrastructure objectives:

- **{To support and promote the expansion of water based activities including slipways, pontoons and marinas}**

Chapter 13

Section:13.8 SDRA 6 – Docklands

Page: 516 Connolly Station

Add to the Masterplan requirements:

- **{Strategy to protect and enhance the character of the existing historic station building}**

Chapter 13

Section:13.8 SDRA 6 – Docklands

Page: 517 Cody's Yard, Ossory Road

Amendment:

Redevelopment of this site should provide a setback from Ossory Road, enabling a widening of the road to facilitate an improved pedestrian and cycle environment. Own-door access to ground floor dwellings fronting Ossory Road, should also be provided **{where feasible, to encourage ground floor activation}**. Requirements of Irish Rail shall be adhered to in relation to built footprint and necessary clearances.

Amendment:

This site located north of the rail line between Macken Street and Grand Canal Quay, has potential to provide a new hub for innovation, {teaching, research, collaboration, enterprise and support facilities} bridging between the commercial activities in Docklands and research at Trinity College {and enabling the development of a globally competitive innovation district for Ireland}.

~~{Setbacks-on}~~ {The Interface with} Pearse Street shall accommodate a transformed ~~(and widened)~~ public realm, and {on street} parking provision shall be minimal. The existing historic Tower Building (original sugar mill) should be retained and potentially extended vertically by a maximum of 2-3 storeys, and {public realm surrounding the building shall provide physical and visual linkages between the proposed central square and} ~~(generous new public space surrounding the building shall enhance its setting, providing an open aspect to)~~ Grand Canal Quay. The approach to building height and design shall take account of established residential uses to the west and north, and also proximity to the Alto Vetro building. General site heights to range from 7 to 9 storeys with potential for {some} locally higher buildings. ~~(at the three selected positions illustrated in the Guiding Principles Map.)~~

There is potential for a landmark building/s within this site having regard to the surrounding context and emerging developments in the area.

{The City Council will work closely with TCD and all relevant stakeholders to prepare a Masterplan for the phased development of the site that establishes high quality development objectives and parameters to ensure that an appropriate mix of uses are provided to support a working and resident community including cultural, recreational, retail and related uses.} ~~(Development of this innovation district shall be in accordance with a masterplan to be agreed with Dublin City Council and addressing phasing in addition to the above matters.)~~

Amendment:

{15. Shelbourne Stadium, South Lotts Road}

The subject site, located in a highly accessible area of the city, comprises c. 3ha of urban lands suitable for strategic development and regeneration. The lands are capable of delivering a high quality mixed use development to complement and enhance both the existing land uses and future strategic plans for the area.

Any future development of the site should be subject to a Masterplan as part of the planning application process and should provide for a mixed use development comprising of residential, commercial and public open space. The building design and layout should respect the existing buildings to the north along Ringsend Road and the proposed future development of opportunity site 12.

Given the scale of the site, opportunities exist for the provision of some locally higher buildings and landmark buildings addressing the River Dodder.

Permeability interventions should be provided through the site from South Lotts Road to the River Dodder and from Ringsend Road through to opportunity site 12. A feasibility study, including the necessary environmental studies, should be prepared to assess the potential of a pedestrian footbridge across the Dodder connecting Ringsend Village and the Wider Docklands area. A public walkway along the bank of the River Dodder should also be delivered to enhance the amenity value of the river at this location.}

Chapter 13

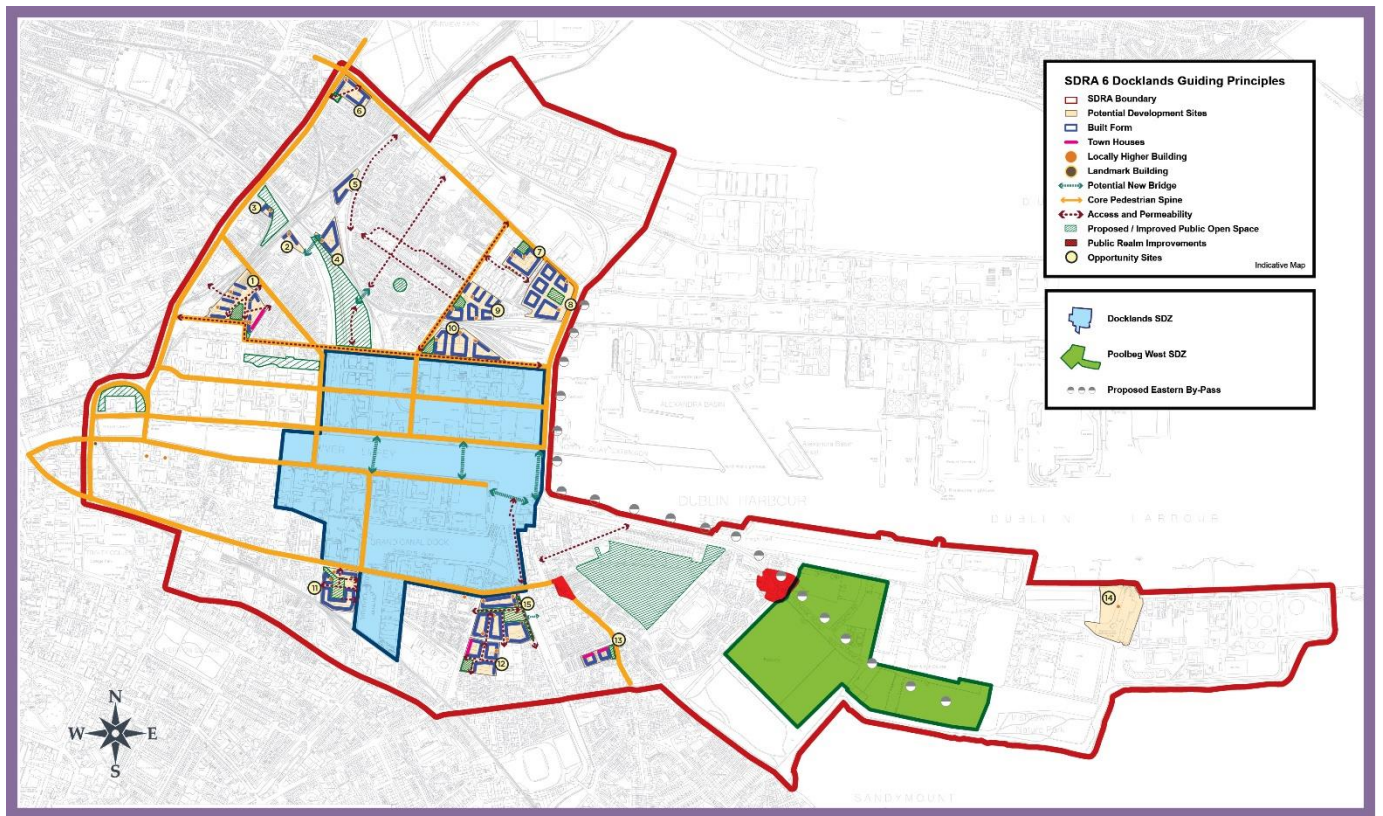
Section:13.8 SDRA 6 – Docklands

Amend Guiding Principles Map to show:

Shelbourne Stadium as an opportunity site.

Include landmark buildings at Opportunity Site 1, Connolly, Tara Street Station, Opportunity Site 11 – Trinity College Innovation District and Opportunity Site 15 Shelbourne Stadium.

Include locally higher buildings at Hawkins House and City Quay.



Section 13.9 SDRA 7 – Heuston and Environs

Summary

A number of submissions were made in relation to the guiding principles set out for SDRA 7, particularly in relation to height. In relation to Heuston South Quarter, it was suggested that the heights set out in the guiding principles are inconsistent with the existing building heights on site and the planning applications pending approval. As such, it was requested that reference to specific heights within the SDRA be removed and referred to Appendix 3 for assessment.

Furthermore, a submission was made requesting that the cone of vision from Royal Hospital Kilmainham (now IMMA) toward the former Royal Military Hospital in the Phoenix Park be amended to shift the main point of vision from the Deputy Master's House to the north eastern corner of the Royal Hospital Kilmainham. An opposing submission was also received requesting that the cone of vision be retained and protected in its current form.

Submissions were also made in respect of Opportunity Sites 2 and 3 to ensure that the guiding principles for these sites are compatible with the overall vision and Masterplan published by CIE for the area.

Concerns regarding the potential traffic impacts associated with large scale regeneration of the area were raised in submissions. It was noted that further consideration be given to potential car parking impacts on state owned lands and amenity areas such as War Memorial Gardens, Phoenix Park and Kilmainham Jail.

It was also noted that any permeability intervention proposed within state own lands in the area should be subject to further consultation with the appropriate stakeholders.

Chief Executive's Response

In relation to the cone of vision, and having reviewed the request in the context of best practise conservation methods, it is recommended that the cone of vision be retained as set out in the SDRA until such time as a full review is undertaken by the Planning Department (in consultation with the OPW and IMMA).

The views to and from Royal Kilmainham Hospital and its gardens (particularly towards the east) have already been significantly compromised by Heuston South Quarter and any narrowing of the view cone, without careful consideration by DCC, could cause further adverse impact on views into and, especially, out of Kilmainham Hospital and its curtilage.

The promotion of sustainable development of the area is a given, but does not confer open-ended opportunities for new development in terms of scale and height. The Royal Hospital is the oldest classical building in Ireland and is of 'International' significance' and, therefore, requires detailed analysis prior to any amendment to the cone of vision. It is recommended that the guiding principles be amended to include a new point to review the cone of vision within the lifetime of the plan.

The review should consider the need to protect the context and setting of the Protected Structure and its curtilage, the attendant grounds, including the walled garden, the terraces (and their views) and the former Deputy Master's house (and views from its terrace); along with the parameters of protection (buffer zone/cordon).

With regard to height, it is considered that the SDRA guiding principles provide for future new development opportunities at an appropriate scale and height as to complement the existing built form in the area and create a quality urban environment in accordance with national planning policies.

In relation to traffic impact, the Draft Development Plan sets out minimum thresholds for traffic and transport assessments as part of the planning application process, see Table 15-1. As such, it is considered that traffic and transport impacts arising from any future development will be adequately addressed as part of development management.

It is considered that there is some merit to CIE's concern about the requirement for the Masterplan to be agreed. Therefore, it is suggested to remove the requirement for agreement but to include a requirement for the masterplan to accord with the SDRA principles etc. and to be submitted with the first significant planning application.

In response to the proposed permeability interventions, it should be noted that the guiding principles are indicative guidelines which will be subject to detailed analysis and assessment as part of a planning application process. As such, any proposed route through state own lands will be subject to detailed consultation with the relevant stakeholder prior to any application being granted.

Chief Executive's Recommendation

To amend the Draft Plan as follows:

Chapter 13

Section:13.9 SDRA 7 – Heuston and Environs

4 – Heuston South Quarter

Page: 529 2nd last paragraph

Amendment:

Building heights should respond to the 'Cone of Vision' identified in the Guiding Principles Map.

{During the lifetime of the development plan, a re-assessment of the Cone of Vision shall take place having regard to the national planning context requiring the need to accommodate increased densities on urban brownfield sites, and the landscape character for protection within the cone, such as landmarks, buildings, views, corridors, etc., identified and weighted.}

Section 13.10 SDRA 8 Grangegorman / Broadstone

Summary

A number of submissions were received requesting that the SDRA boundary for Grangegorman be extended to include Prussia Street to the west. It was noted that Prussia Street is in need of regeneration and a comprehensive development framework to ensure future development is consistent with the wider area.

Submissions also noted that the heights proposed for Grangegorman were too low having regard to the location of the lands in close proximity to the city centre and well served by public transport. The requirement for a masterplan was also raised and submissions sought that this guiding principle be removed to enable development come forward in the short term. Submissions for enhanced greening and biodiversity were also noted.

CIE requested that the guiding principles for Broadstone be amended to reflect CIE's plans to retain the depot and for the omission of locally higher building(s) on the map.

Grangegorman Development Agency also sought amendments to the text to reflect the progress on site to date and a change to the naming of the University from TUD to TU Dublin.

Chief Executive's Response

The SDRA boundary has been considered having regard to the strategic development and regeneration potential of the lands surrounding Grangegorman. The SDRA is largely consistent with the SDZ Planning Scheme boundary, and also includes large scale brownfield lands at Broadstone with significant development potential. Prussia Street, to the west of the SDRA, comprises of a number of vacant, underutilised sites in significant need of regeneration. As such, it is considered that the Prussia Street area would benefit from inclusion in the SDRA to support and enhance the quality of the area.

In this regard, it is recommended that Prussia Street from the Park Shopping Centre to the junction with St. Joseph's Road including the MSL Service Centre on North Circular Road be included in the Grangegorman SDRA.

In relation to height, the majority of the SDRA is governed by the Planning Scheme set out in accordance with the SDZ. In this respect, the SDZ is the primary document for development standards in the area and must be complied with. Notwithstanding the above, the SDZ sets out a range of building heights that are considered appropriate for the area considering the site constraints, level changes and the number of protected structures on site and the need to protect and enhance the setting and character of these buildings. Heights are generally between 6-8 storeys with taller elements of up to 12-15 storeys. These heights correspond with the locally higher building category as set out in Appendix 3.

The Broadstone lands, which are outside of the SDZ and subject to development standards as set out in the Development Plan have been considered for the potential of 2/3 locally higher buildings following detailed design through the preparation of a Masterplan.

CIE seeks the omission of locally higher buildings within the Broadstone lands as the depot remains and there is no future plans to vacate the premises at this time. However, given that the plan is a forward looking document, it is considered that there is a need to set general guiding principles for this large scale site within the SDRA should redevelopment of the site come

forward in the future in order to ensure the sustainable development and proper planning of the area.

In relation to the preparation of a Masterplan, the Broadstone area is zoned Z10 which specifically sets out a requirement to prepare a masterplan for any redevelopment of such zoned lands. In addition, Broadstone is a significant land holding and has the potential to deliver significant quantum's of mixed use development. As such, it is considered necessary that a Masterplan be prepared in order to ensure a coherent development strategy for the site is provided.

The Grangegorman SDZ has specific policies and objectives in relation to biodiversity and greening. The SDZ seeks to provide for a series of "green fingers" which are landscaped routes comprising of permeable surfaces, native planning species and large trees that seek to enhance the biodiversity and carbon absorption of the area and improve the microclimatic conditions within the site. The delivery and protection of these "green fingers" is integral to the SDZ and is supported in the SDRA.

The Chief Executive acknowledges the Grangegorman Development Agency's request regarding amendments to the SDRA text to accurately reflect the progress on site to date and the correction of the naming of TU Dublin and recommends that the plan be changed in this regard.

Chief Executive's Recommendation

The CE recommends the following changes:

Chapter 13

Section:13.10 SDRA 8 Grangegorman / Broadstone

Page: 532

Amendment:

The construction of a c. 4,414 m² Greenway Hub building, a c.16,000m² East Quad and a c.33,000m² Central Quad is now complete, accommodating academic activities and facilities required for the Environmental Health Sciences Institute and business incubation space, the College of Arts & Tourism, College of Sciences & Health and College of Engineering and Built Environment. It is anticipated that the TU Dublin developments will provide capacity for a student population of c.15,000 by 2024. **{The repurposing of TU Dublin's Park House continues. It now houses a c. 10,000 sq. m. temporary university library and office space.}**

Chapter 13

Section:13.10 SDRA 8 Grangegorman / Broadstone

Page: 533

Amendment:

~~**{By 2023, c.100 bed Residential Care Neighbourhood for the elderly and those with a mental health support needs will be delivered}.**~~ **{It is currently anticipated that by 2025, a c. 100 bed Residential Care Neighbourhood for the elderly, and for those with a mental health support need will be delivered}.** Within this timeframe, it is also anticipated that a new 24 Classroom Educate Together National School will be in service, replacing a current temporary facility.

Chapter 13
Section:13.10 SDRA 8 Grangegorman / Broadstone
Page: 534
New Last Paragraph

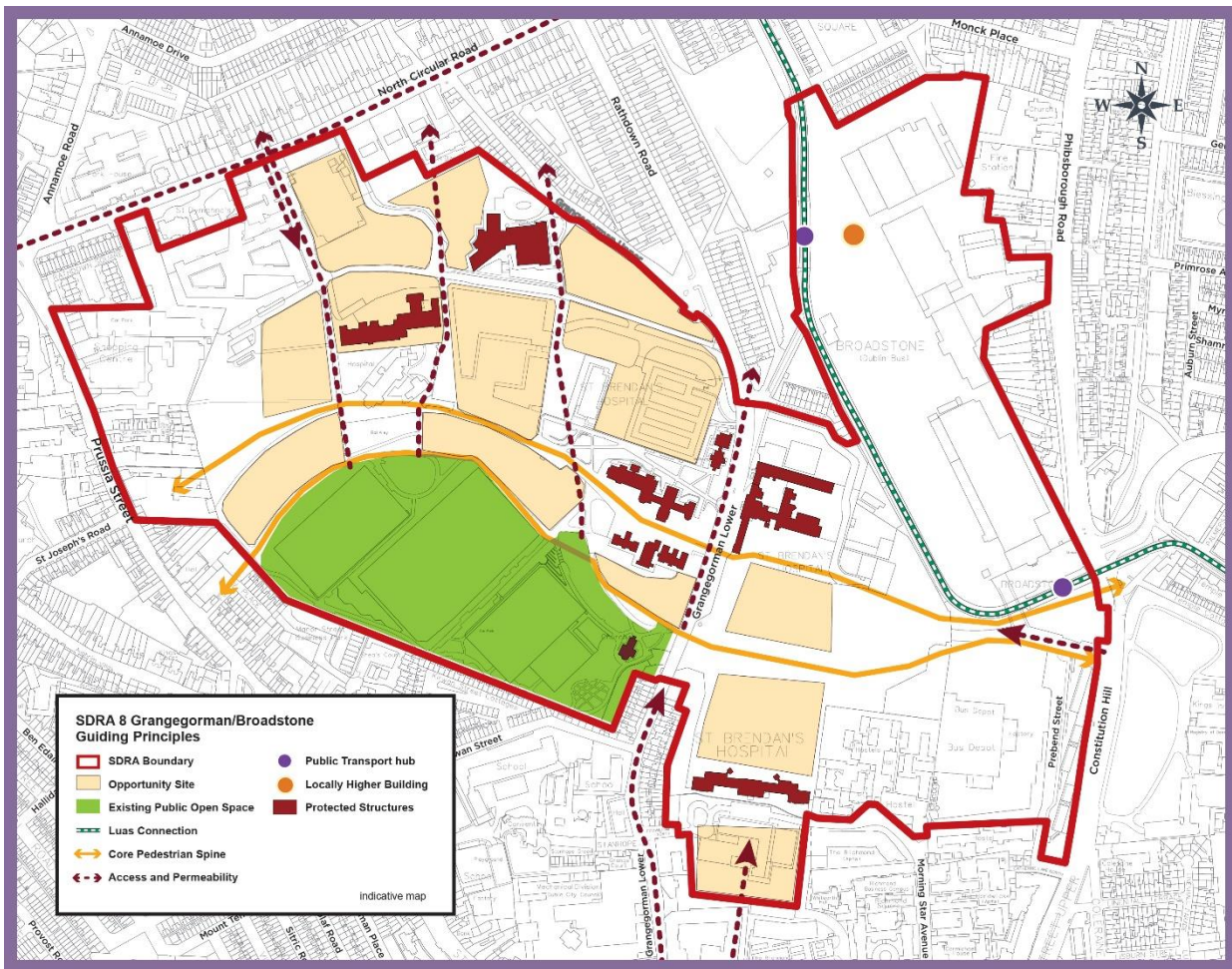
Amendment:

{Prussia Street is located on the western side of the SDRA linking Stoneybatter Village to the North Circular Road. This key thoroughfare provides for significant strategic development opportunities through the regeneration of a number of vacant and underutilised sites for mixed use development. Future development in the area shall provide for a coherent and considered streetscape that respects the existing historic character whilst at the same time ensuring an appropriate scale and density is achieved in line with the 15 minute city objective.

A Masterplan shall be prepared for the area that sets out a clear development strategy including the provision of new permeability routes linking to the wider Grangegorman Campus, a vibrant and active streetscape and the provision of local services and amenities. All developments will be assessed on a case by case in the context of Appendix 3 and the relevant development standards.}

Chapter 13
Section: 13.10 SDRA 8 Grangegorman / Broadstone
Page: 535 Figure 13-8

Amend Map to include Prussia Street (as set out above) within SDRA boundary.



Section 13.11 SDR 9 Emmet Road

Summary

A number of submissions were made in respect of height, specifically regarding applications currently in the planning system and what standards apply.

Submissions were also made seeking the unit mix set out in the HNDA for Dublin 8 and Dublin 1 to be applied to the Emmet Road area to ensure delivery of larger units and for the guiding principles to be amended to ensure a variety of housing types are provided. Requests to specify the proposed 30% social and 70% cost rental provision on the Emmet Road Regeneration site are also submitted. The requirement for “pepper potting” social housing was also raised to be specifically addressed as part of the Emmet Road Regeneration site guiding principles. Concerns regarding the omission of some guiding principles that were set out in the current 2016-2022 Development Plan were raised including the requirement for an innovative proposal to create a landmark destination for combined facilities of a community, recreational, leisure and sports nature.

Queries in relation to the capacity set out for Emmet Road SDR 9 were raised seeking clarity on the distribution of units in the area.

Submissions were also made in support of the increased provision of open space and recreational amenity in the area.

Chief Executive’s Response

In relation to height, the standards set out in the current 2016-2022 Development Plan remain in place until the new Development Plan 2022-2028 is adopted. Applications currently in the system will be assessed in accordance with the relevant Development Plan that is in place at the time of decision. With regard to unit capacity, the Core Strategy sets out targets for each of the SDR 9 areas. These targets are based on land availability and the capacity that can be provided based on the guiding principles in the SDR 9. It is envisaged that approximately of 1,050 units can be provided within the entire Emmet Road SDR 9 lands, c. 15ha.

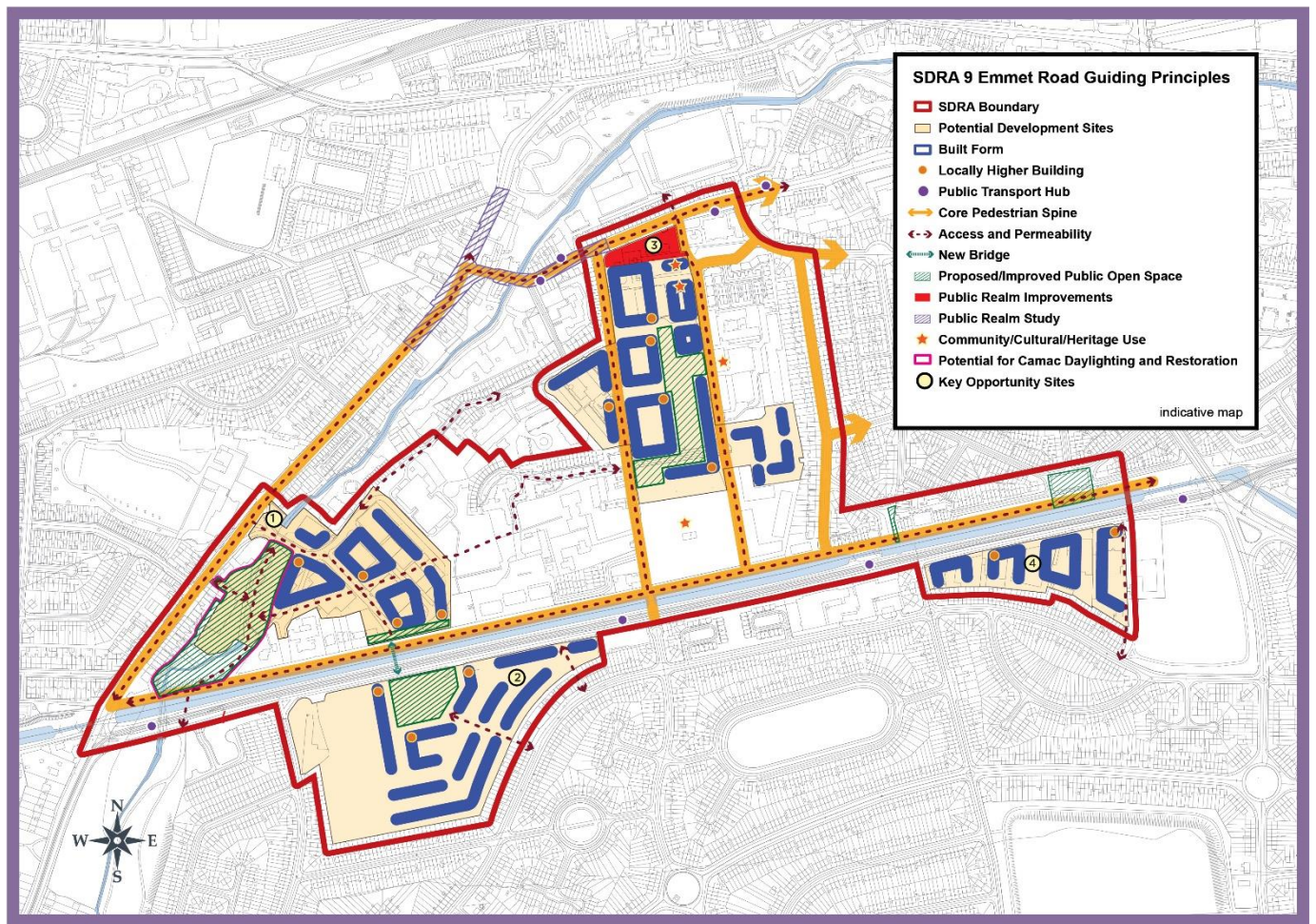
In relation to the omission of certain guiding principles from the 2016 to the new Draft Plan, the SDR 9 has been reviewed in the context of national planning policy and new guidelines which have come into effect since the publication of the 2016 plan. As such, it was necessary to amend guiding principles to ensure the sustainable development and proper planning of the area.

With regard to unit mix, a HNDA was prepared as part of the Development Plan review which identified the Liberties and North East Inner City for specific unit mix standards based on three main factors that differentiates these areas from the wider city in terms of residential development pressure as set out in Section 6.4 of the HNDA. The Emmet Road area did not meet the criteria for specified unit mix in this regard and, therefore, the standard unit mix as set out in section 15.9.1 of the Development Plan applies. Specifying unit tenure e.g. cost rental or social, is controlled by specific legislation, Affordable Housing Act, 2021, which is outside the scope of the Development Plan.

The Chief Executive welcomes the support for the provision of additional green open space in the area.

Chief Executive's Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily responds to issues raised.



Section 13.12 SDR A 10 North East Inner City

Summary

A number of submissions were made resisting the proposed permeability intervention at Summer Street North due to concerns regarding significant antisocial behaviour. The road was previously a connecting route and a wall to make the Road a cul de sac was erected to try and reduce antisocial behaviour in the area.

Submissions were also made in respect of the lack of green space in the area and the need to ensure more green space is provided and improvements to the public realm prioritised in any regeneration of the area. Specific recommendations for the provision of new public open space areas were submitted including lands to the rear of the Custom House, vacant underutilised lands adjoining the railway lines, underutilised vacant sites and lands at Fitzgibbon Street.

Submissions also raised concerns regarding the quality of the existing historic building stock within the North Georgian Core and the need for increased protection and greater emphasis on the quality of the built heritage be included in the SDR A. It was requested that areas of specific historic value be designated as Architectural Conservation Areas in order to protect and appropriately utilise historic buildings and streetscapes in the future.

Submissions in respect of the preparation and delivery of an LAP for the area were noted as well as specific concerns relating to the unit mix in the area and lack of larger units and overconcentration of homeless accommodation in the area.

Site specific submissions were made in respect of the CIE Depot lands, calling for rezoning of the lands to Z9 and greater refinement of the layout of the site, particularly the scale of development and the facade line along Belvedere Road, Belvedere Place and Mountjoy Square. It is submitted that the proposed building line and building height be continuous with the existing buildings and that no additional height on the corner be proposed.

A submission was also made in relation to Development Area 12 - Aldborough House. It was submitted that any future development of this site must recognise the historic merits and setting of the area.

It was also requested that the Former Magdalene Laundry and Convent Building should have housing, a memorial and an educational facility as proposed by the Central Area Committee.

Chief Executive's Response

The Chief Executive recognises that there has been significant issues with antisocial behaviour in the area in the past and recommends that the permeability intervention at this location be omitted from the SDR A Guiding Principles map. The Development Plan is a forward looking document and seeks to ensure that appropriate policies and objectives are provided for the future development of the city. The SDR A's are identified as specific areas in need of strategic development and regeneration and as such guiding principles have been set out to encourage new forms of development to support a general improvement of the SDR A environment both physically and socially.

Redevelopment of underutilised vacant sites, the provision of new community and amenity areas and the inclusion of new permeability interventions seeks to promote a greater sense of place and quality urban environment in the area to integrate and connect both new and existing

communities. It is, therefore, recommended that the City Council work with local residential to enhance the quality and amenity of the area, increase permeability and explore additional pedestrian connectivity routes within the SDRA.

In relation to the provision of open space, it is recognised that this area of the city has below average provision of public open space and as such, projects such as the North East Inner City Greening Strategy are supported within the SDRA to address the deficit of public open space. Furthermore, the SDRA promotes greening initiatives and the upgrading of existing open spaces as well as seeking to provide for new public gardens at Sean McDermott Street, increased street greening through the removal of on street parking at Parnell Street and the creation of accessible amenity space and a reimagined Royal Canal as a key public amenity and biodiversity corridor.

The Chief Executive also recognises the strong built heritage and the significant Georgian building stock in the area. The SDRA supports the importance of the architectural and cultural heritage of the area and seeks to provide for high quality architecture through regeneration of the area. It is considered however, that greater emphasis could be placed on the heritage buildings as part of the key objectives for the area.

In response to the requests for an LAP to be prepared, NEIC is listed as a priority LAP to be prepared during the Development Plan period in accordance with Objective CSO3.

With regard to the site specific submissions, opportunity sites No. 8 – Bus Depot, Summerhill and No. 12 – Aldborough House, it should be noted that the guiding principles map is indicative and flexibility may be applied in the development of such sites. Specific details in relation to the building line, appropriate heights and setting of the protected structure will be assessed in detail as part of any future planning application.

In relation to Opportunity Site 10 – Convent Lands, formerly the Magdalene Laundry, the SDRA presently seeks that this site be refurbished with regard to conservation and cultural heritage to provide a memorial and associated gardens to recognise the history of the site. The CE supports the identification of the site as culturally significant in this regard.

Chief Executive's Recommendation

The CE recommends the following amendments:

Chapter 13

Section: 13.12 SDRA 10 – North East Inner City

Page: 543

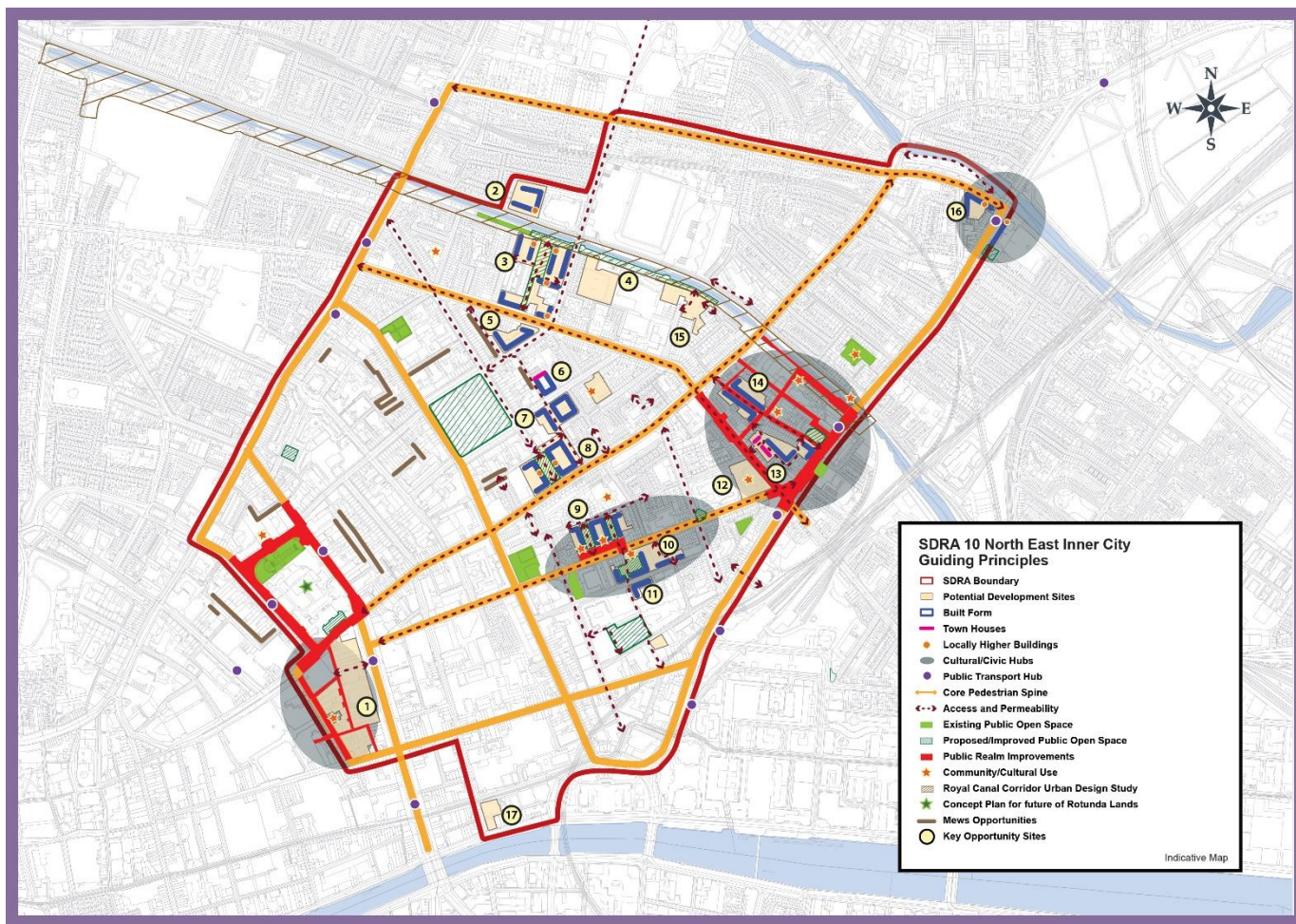
Amendment:

- a. To provide a spatial framework for land uses including much-needed housing.
- b. To restore a coherent urban structure where it is poor or fragmented and improving the public realm.
- c. To support community development through targeted objectives on selected sites.
- d. To plan for improved connectivity and public amenity while utilising existing assets in the area.
- e. **{To support the protection and enhancement of the unique historic character of the area through refurbishment and regeneration of the North Georgian Core}**

Chapter 13
Section: 13.12 SDRA 10 – North East Inner City
Page: 543
And Figure 13.10

Amendment:

Omit reference to permeability intervention at Summer Street North and amend guiding principles map accordingly.



Section 13.13 SDRA 11 St. Teresa's Gardens

Summary

A number of submissions were received in respect of the proposed heights and densities set out in the SDRA Guiding Principles. It is submitted that the heights and densities proposed are excessive and impact the existing developments in the area especially in terms of daylight and sunlight.

Submissions also raised concerns in relation to traffic impacts arising from the SDRA and the lack of proper pedestrian and cycle networks in the area. The lack of open green space and community facilities were also noted. Submissions also sought that the church lands be retained as Z15.

A number of submissions requested that the unit mix in the area be reviewed to provide more 3 bed family sized units. Submissions sought that the 2017 Framework Plan be reinstated to form the basis of the SDRA and reference to the 2020 Masterplan be omitted.

Chief Executive's Response

In response to the submissions seeking the reinstatement of the 2017 Framework Plan for the area, it should be noted that the Guiding Principles of the SDRA have been prepared specifically in response to the review of the Development Plan and recent changes to National Planning Policy including the National Planning Framework, Housing for All, Urban Development and Building Height Guidelines, and the Sustainable Residential Development – Apartment Guidelines. The guiding principles are forward looking and create a new development framework for the area that responds to the overarching national planning policies.

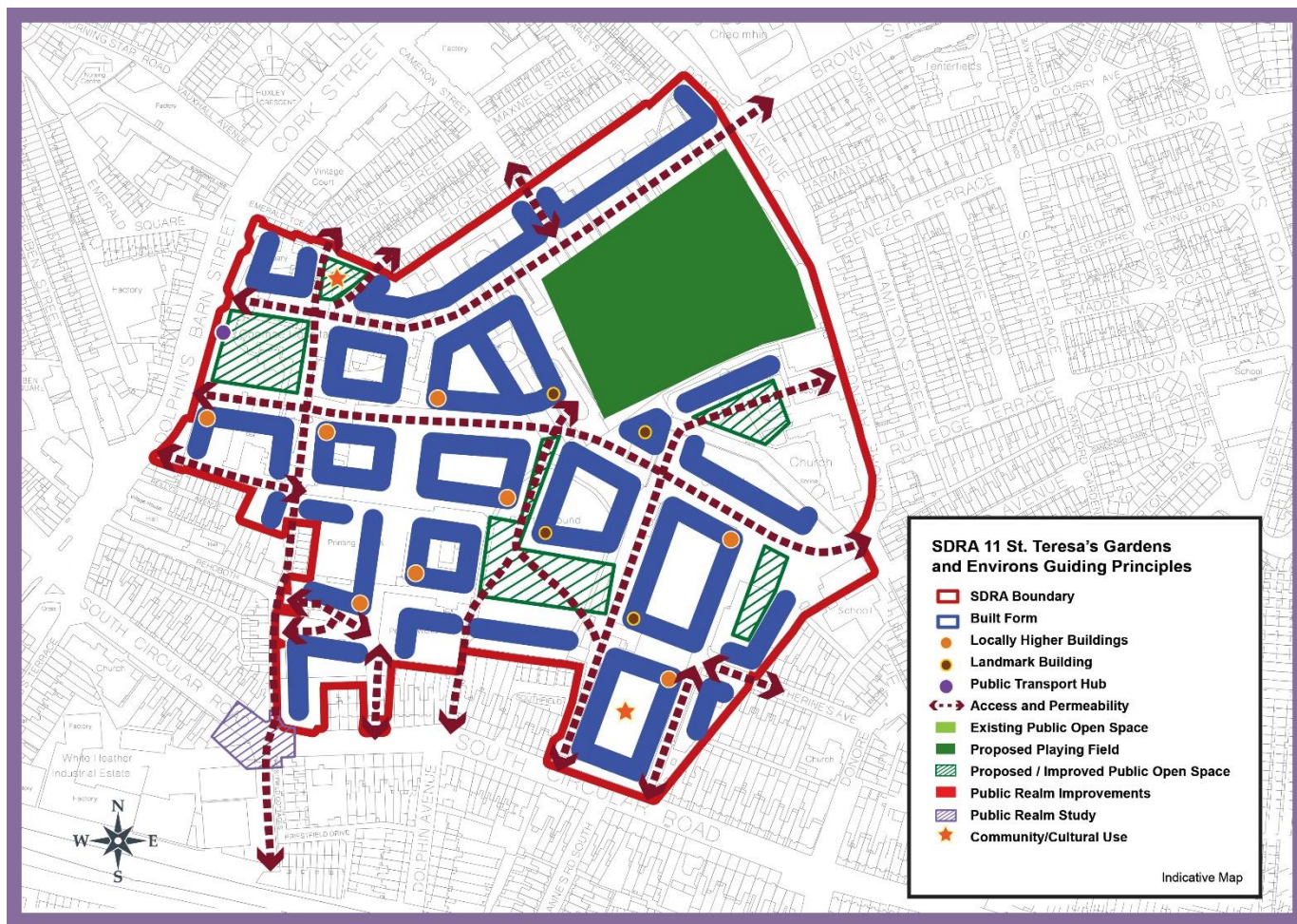
Notwithstanding the above, it should be noted that the overall parameters of the 2017 Framework Plan have been incorporated into the new SDRA Guiding Principles including the overall built form and layout, permeability interventions and linking routes and the provision of green public open space. Furthermore, the location of the taller elements remain concentrated to the centre of the site in a similar arrangement to that suggested in the 2017 plan. In respect of the statement that the SDRA guiding principles favours the 2020 Hines Masterplan, it should be noted that this Masterplan was prepared as part of an SHD application which was subject to a decision by An Bord Pleanála and outside the scope of the Development Plan.

The proposed SDRA Guiding Principles are considered an appropriate design response for the area and are proposed on their own merit having regard to good urban design principles and national planning guidance. As such, it is considered that the design and layout of the SDRA is satisfactory and no change is proposed.

In relation to traffic and transport impacts, the Development Plan sets out thresholds for various different assessment that must be provided as part of any planning application, see Table 15-1. Detailed analysis on the traffic and transport impacts of any future development will be addressed and assessed in this regard. In respect of the pedestrian and cycle provision, the SDRA provides for a significant number of permeability interventions that support the provision of new pedestrian and cycle routes and well as upgrading and greening existing routes in the area.

Chief Executive's Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily responds to issues raised.



Section 13.14 SDRA 12 Dolphin House

Summary

A small number of submissions were made in respect of Dolphin House. It was recommended that a greater variety of unit mix be provided in the area and that enhanced recreational facilities including promotion of water based amenities along the Canal be supported.

Chief Executive's Response

The Chief Executive welcomes the submissions made and supports the suggestion to encourage greater use of the existing amenities, specifically the Canal for water based recreation. Policy GI32 seeks to develop linear parks, sustainable riverine access, walkways, cycleways and water focused recreational, sporting and tourism amenities.

In relation to unit mix, the SDRA is located outside the designated area as set out in the HNDA for an alternative unit mix and as such must comply with SPPR 1 stated in the Apartment Guidelines 2020.

Chief Executive's Recommendation

It is recommended that greater emphasis be placed on the provision of water based amenities in the SDRA in accordance with Policy GI32.

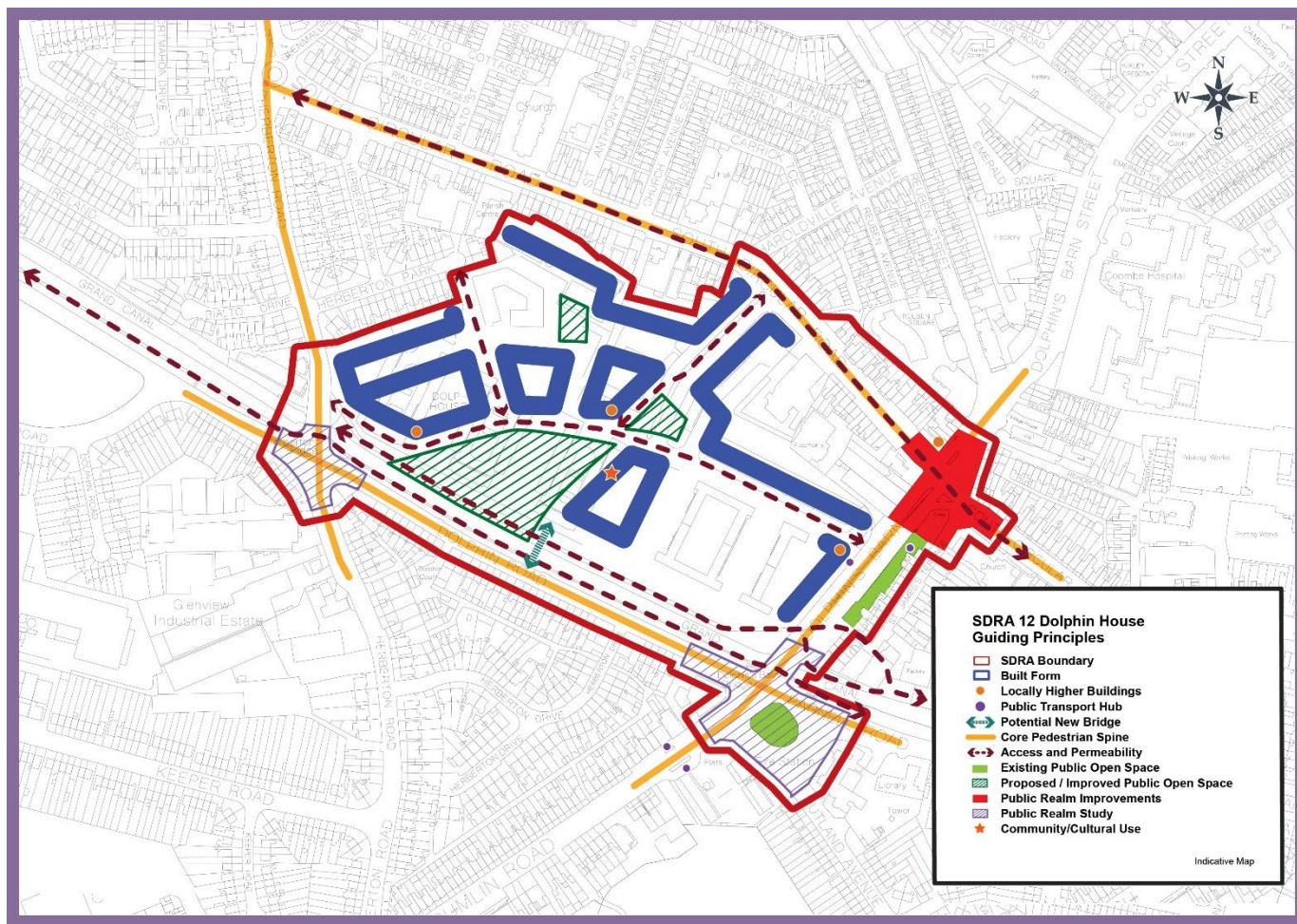
Chapter 13

Section:13.14 SDRA 12 – Dolphin House

Page: 567 – new bullet point

Amendment:

{To support the provision of water based amenities and recreation along the Canal in accordance with GI32.}



Section 13.15 SDRA 13 Markets Area and Environs

Summary

A number of submissions were made in respect of the restoration of the historic markets and to support on street market trading in the area. Submissions also raised concerns in relation to the height proposed in the area.

Calls for greater emphasis and recognition of the built heritage and protection were also submitted.

Chief Executive's Response

The Chief Executive recognises the historic importance of the Markets area and seeks to reinforce the protection of the built heritage in the SDRA.

In relation to market trading, it is acknowledged that this area contains a rich history of casual trading and the continued support of such is recommended in the SDRA.

Chief Executive's Recommendation

It is recommended that amendments to the SDRA are incorporated to recognise the strong physical and commercial history of the area.

Chapter 13

Section:13.15 SDRA 13 – Markets Area and Environs

Page: 571 – new bullet

Amendment:

- **{To recognise the strong character and historic built fabric of the area and support the retention and reuse of existing historic buildings of merit.}**

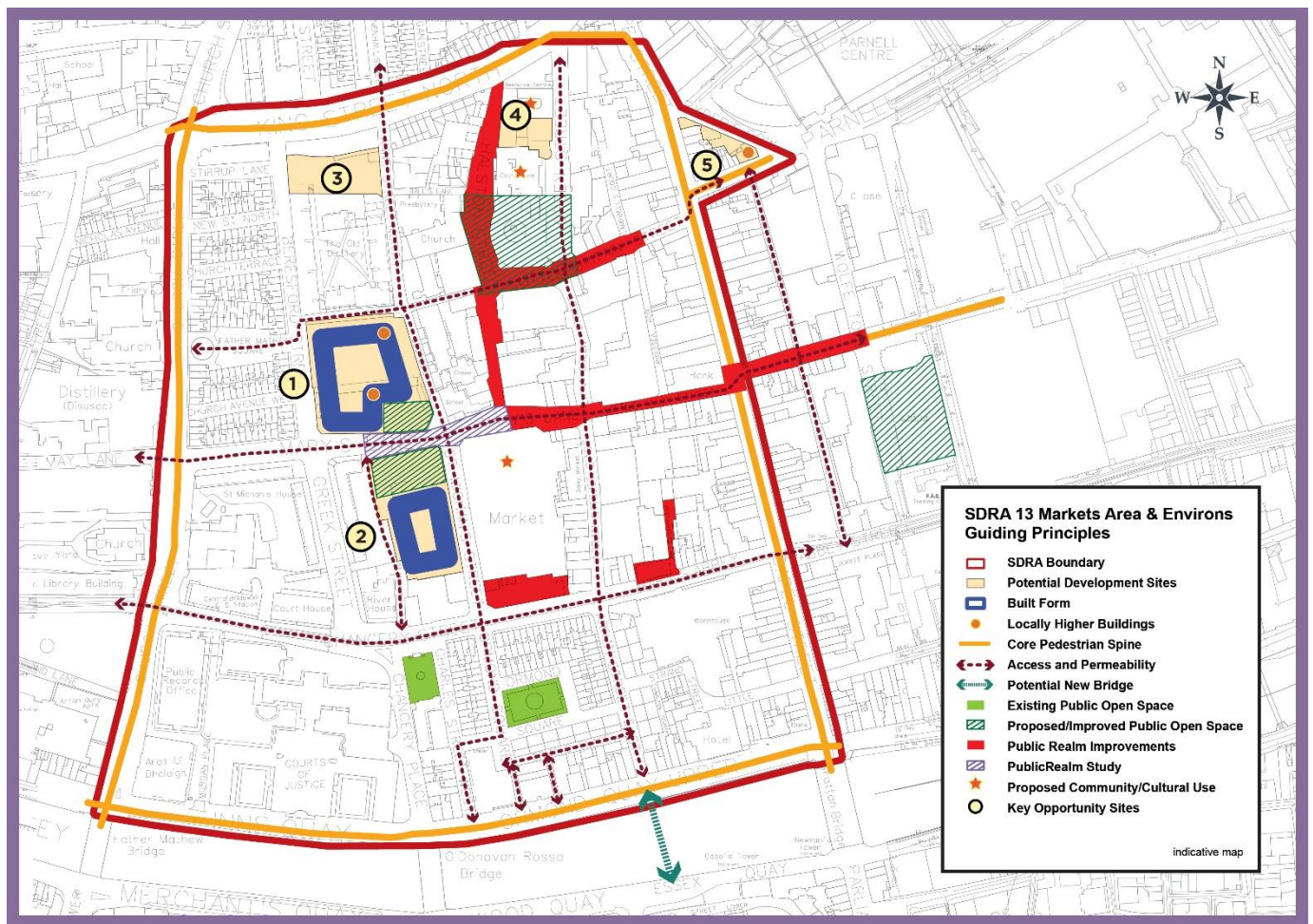
Chapter 13

Section:13.15 SDRA 13 – Markets Area and Environs

Page: 571 – Land Use and Activity

Amendment:

Having regard to the above, a framework for redevelopment of underutilised sites needs to demonstrate sensitive integration whilst also generating new vitality. Opportunities for the creation of quality new green/open spaces as part of larger redevelopment projects can supplement existing spaces at Chancery Park, St. Michan's Park and Ormond Square. There is also considerable scope for public realm upgrades which can both enhance the setting of these spaces and provide quality connections between key destinations. **{Opportunities also exist to support casual market trading in appropriate public realm areas subject to appropriate licencing.}**



Section 13.16 SDR 14 St. James Healthcare Campus and Environs

Summary

A submission was made from St. James Hospital in relation to the Strategic Campus plan for the SDR site which sought that the SDR align with the future vision of the campus. In addition, it was requested that the SDR name be changed to St. James Healthcare Campus and referenced as such throughout the plan.

The Coombe Hospital requested that reference to the relocation of the Coombe be omitted from St. James Healthcare Campus SDR as there was no immediate plans to relocate the hospital to this location during the lifetime of this Development Plan.

Submissions noted that the SDR was capable of achieving greater height and increasing the height would present a more efficient use of the highly accessible lands.

Improvements to the public transport network in the area were also sought as part of the submissions received.

Chief Executive's Response

The Chief Executive agrees the naming of the SDR should refer to Healthcare Campus rather than Medical Campus and recommends that the naming convention be amended throughout the plan. In addition, the Chief Executive recognises that there are strategic plans for the development of the St. James site as a new national healthcare complex. It is considered that the SDR is sufficiently flexible to include the redevelopment of the site for Healthcare.

In relation to the omission of reference to the relocation of the Coombe Hospital to St. James's Healthcare Campus, the Development Plan is a forward looking document that sets out aspirations and visions that extend beyond the Development Plan period. As such, it is considered that the long term objective to relocate the Coombe Maternity Hospital to the SDR should be retained to provide a clear vision for the area in the long term.

With regard to the public transport network, the provision of transport infrastructure is not within the scope of the Development Plan. Infrastructural projects are determined by national plans prepared by statutory bodies such as NTA and TII to which the Development Plan will comply. Map J of the Draft Plan sets out all of the relevant transport infrastructure in the city as it relates to the SDR's.

Chief Executive's Recommendation

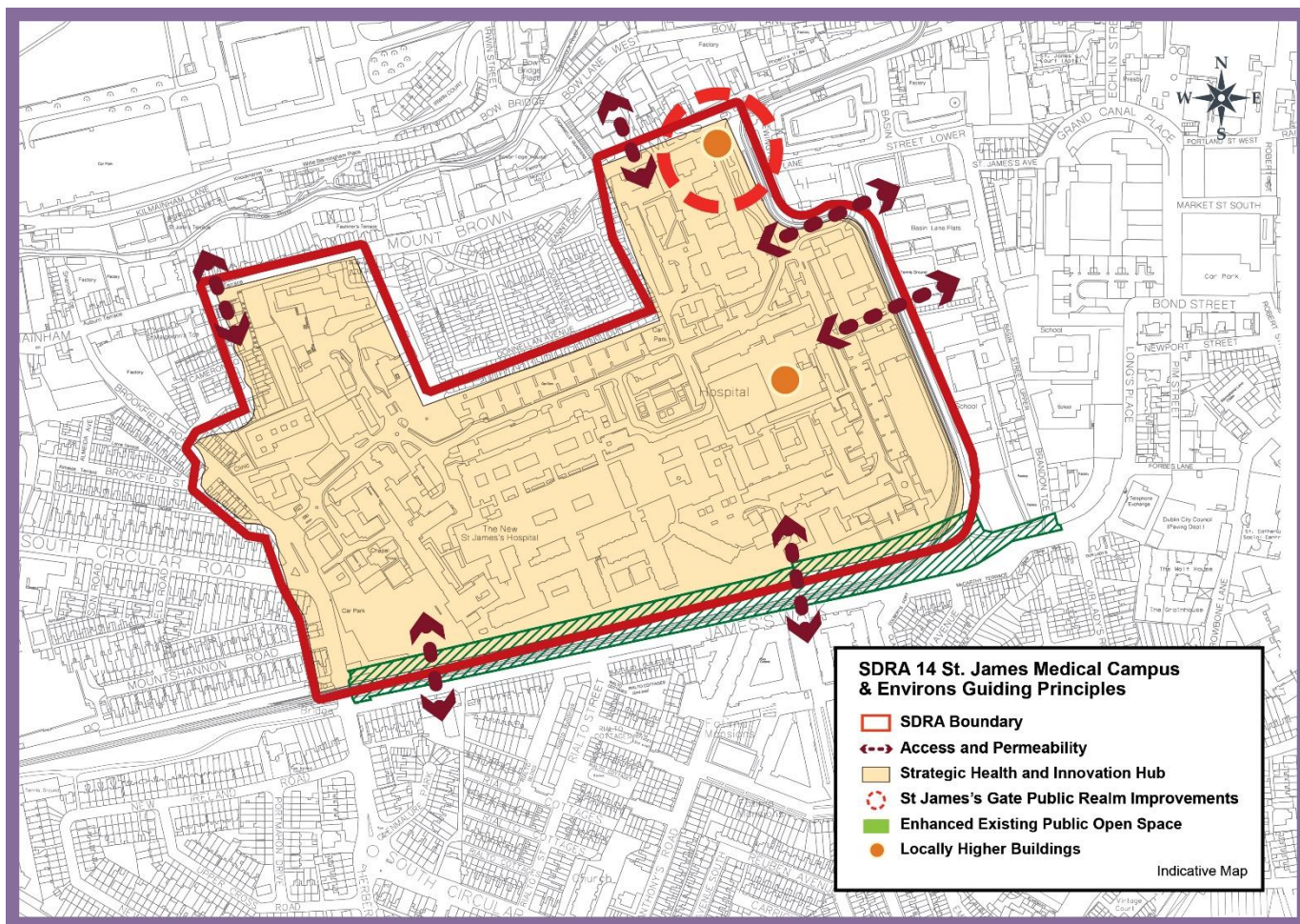
It is recommended that the naming of St. James's be replaced throughout the plan for consistency.

Chapter 13

Section:13.16 SDR 14 St. James Medical Campus and Environs

Amendment:

Replace St. James Medical Campus and Environs with St. James Healthcare Campus and Environs in all occurrences in the plan.



Section 13.17 SDRA 15 – Liberties and Newmarket Square

Summary

A number of submissions were made in relation to building heights proposed and the impact on existing buildings in the area. Concerns regarding the impact on protected structures and the lack of recognition of the built heritage in the area were also raised in this regard.

Submissions also raised concerns regarding the open space provision in the area and the lack of community, cultural and recreational amenities in the area. Specific requests for additional open space to be delivered at St. Patricks Tower and Marrowbone Lane were also raised. A specific request for a community cultural facility to be delivered through the redevelopment of the school site on School Street was also noted.

Support for the provision of new pedestrian and cycle linkages were noted and a commitment to ensure the delivery of these routes was requested, particularly the main north south route through the SDRA area.

The requirement for a Masterplan on Guinness Lands was supported however, calls for a Masterplan to be prepared for the entire area to ensure consistency were also noted.

The issue of overconcentration of hotel and tourist accommodation was raised and requests for restrictions on the provision of hotel and tourist accommodation in the area were submitted.

A site specific submission regarding the overall future plans and operations on the Guinness Lands was also submitted, requesting specific amendments to the guiding principles including recognition of the ongoing brewing activity on lands to the north of Thomas Street and protection of the panoramic views from the Guinness Storehouse.

Chief Executive's Response

In relation to height, the SDRA sets out a benchmark height of 6-8 storeys where conservation and design considerations permit with some opportunities for locally higher buildings. The assessment of building height must accord with Appendix 3 in all instances, notwithstanding the SDRA height objectives. All applications will be assessed on a case by case basis having regard to compliance with the criteria set out in Appendix 3 which include impact on historic buildings / settings, urban design principles and qualitative analysis, such as daylight and sunlight.

With regard to open space, the SDRA sets out specific guiding principles to support a general improvement in the quality and quantum of open space provided within the area. The SDRA supports the implementation of the Liberties Greening Strategy and seeks to identify further projects within the SDRA that offer opportunities for biodiversity enhancement. It is a specific objective of the Draft Plan to ensure that all new residential developments deliver a minimum of 10% public open space, which is supported in the SDRA to ensure all new spaces are visible, inviting and accessible to all members of the public. The SDRA also identifies a number of new areas of open spaces / enhancements to existing spaces to be provided, including Pimlico flat complex, Thomas Street, Bru Chaomhin, the Weir Home, St. James's and Flanagan's Field. The area surrounding St. Patrick's Tower is also supported as set out in Opportunity Site 5 – Digital Hub.

As part of this open space network, and surrounding opportunity sites, the SDRA is committed to delivering quality pedestrian and cycle routes to improve connectivity in the area. It is proposed to green these routes where possible in accordance with Policy GI5.

In response to the Masterplan requirement, many of the opportunity sites within the SDRA are requested to agree a Masterplan with the Planning Authority prior to commencement of development on site. In addition, Objective CUO21 states that all sites over 1ha must prepare a Masterplan to ensure an appropriate mix of uses including community and cultural uses are provided on the site.

Hotel and tourist accommodation have specific planning controls within the Draft Plan. It is required that any new hotel or aparthotel prepare a study to justify the development in the context of an overconcentration of such uses in the area, see Objective CEE01. The requirement for a masterplan will also seek to address any overconcentration of hotel or tourist accommodation in the area.

With regard to the site specific submission for Guinness Lands, the CE recognises the importance of these lands to support the continued production and employment in the area. It is noted that the submission largely related to lands to the north of Thomas Street which are currently in use for brewing activities and the guiding principles to provide for a new open space area and permeability interventions through the site. It is acknowledged that there is no immediate plans for redevelopment of these lands, however, the Development Plan is a forward looking document and, therefore, the SDRA provides for guiding principles for development should the lands come forward for regeneration. In this respect, it is considered appropriate to retain the guiding principles, however to clarify that these interventions will only be considered subject to a large scale redevelopment of the area.

In response to the protection of the panoramic view points, it is acknowledged that the viewing tower at the Guinness Storehouse provides for a unique experience in the city. However, all applications for significant height will be subject to compliance with the criteria as set out in Appendix 3 which includes the requirement to assess the impacts on surrounding viewpoints. As such, it is considered that building heights will be controlled through the development management process. These safeguards are sufficient to protect the panorama view from the Guinness Storehouse.

Chief Executive's Recommendation

The Chief Executive recommends amendments to the guiding principles to support the provision of community uses, to reflect the proposed rezoning of Marrowbone Lane and to take account of the future plans at Guinness Lands, which is designated as a significant development site in the area.

Chapter 13

Section:13.17 SDRA 15 Liberties and Newmarket Square

Page:582 Land use and Activity

Amendment:

- To support the provisions of the Smart D8 project in relation to the provision of a Healthcare Innovation Corridor.

- To {support the provision of community/ cultural uses and} undertake an audit of community infrastructure in the Liberties area in order to identify {additional} community needs.

Chapter 13

Section:13.17 SDRA 15 Liberties and Newmarket Square

Page:584 Green Infrastructure

Amendment:

- To support the creation of a public park as part of the regeneration of the Pimlico flat complex.~~(involving the consolidation of the Poole St. playing facilities and the existing pocket park at the corner of Earl St. and Thomas Court Bawn.)~~

Chapter 13

Section:13.17 SDRA 15 Liberties and Newmarket Square

Page: 588 Marrowbone Lane

Amendment:

It is considered that the SDRA should deliver the objectives for the site including:

- ~~(The council owned depot at Marrowbone Lane to be developed as a Green Infrastructure and Recreational Area.)~~
- {Consolidation and reduction in area of the existing City Council depot and the regeneration of the wider depot area.}
- Extension of amenity/recreational spaces in association with St. Catherine's sports centre {and a new public space onto Marrowbone Lane.}

Chapter 13

Section:13.17 SDRA 15 Liberties and Newmarket Square

Page: 589 Guinness Lands

Amendment:

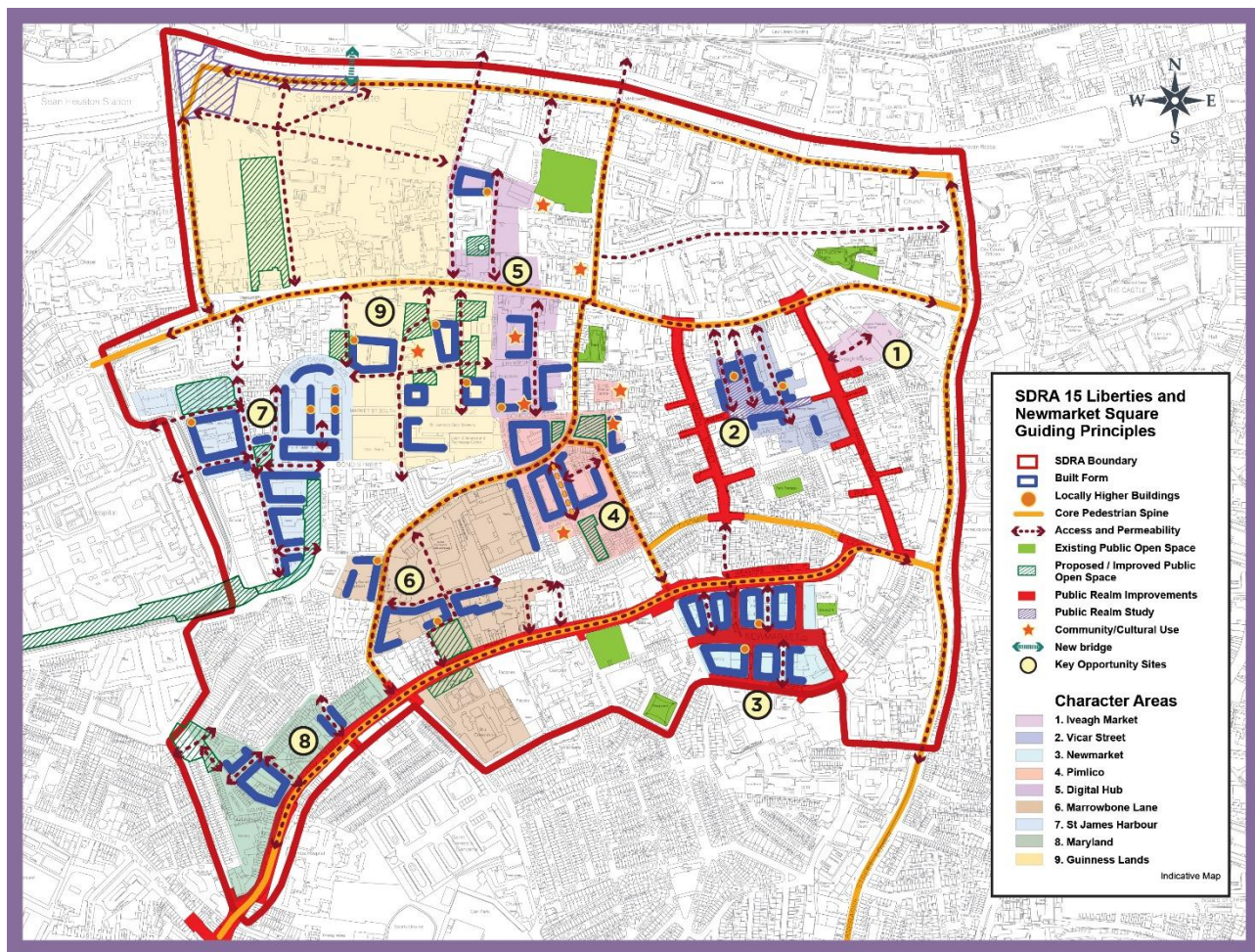
While the operational requirements of the Guinness Lands to the north of Thomas St. are likely to remain beyond the term of the Development Plan, opportunities for smaller parcels of land to be redeveloped may arise in the medium term. {The guiding principles identified for Diageo's lands north of James's Street are for consideration as part of any major future redevelopment of the lands and should be designed to be compatible with the operational requirements of the brewery during the lifetime of the development plan.}

Chapter 13

Page: 591 Figure 13.15

Amendment:

Amend guiding principles map to omit reference to green infrastructure and recreational area at Marrowbone Lane and include as part of Opportunity Site 6.



Section 13.18 SDRA 16 – Oscar Traynor Road

Summary

A submission was made in respect of the site specific road improvements to the public road network outlined in SDRA 16 being premature in advance of the completion of technical assessments being undertaken and should be omitted from the Plan.

The submission welcomed the revised approach with regard to height, however concerns were raised in respect of the height limits set out. It was submitted that managing height would best be addressed through design solutions as part of a planning application rather than setting a limit for the area. Furthermore, queries in relation to the zoning of the lands as Z12 were also raised and a rezoning was requested.

Chief Executive's Response

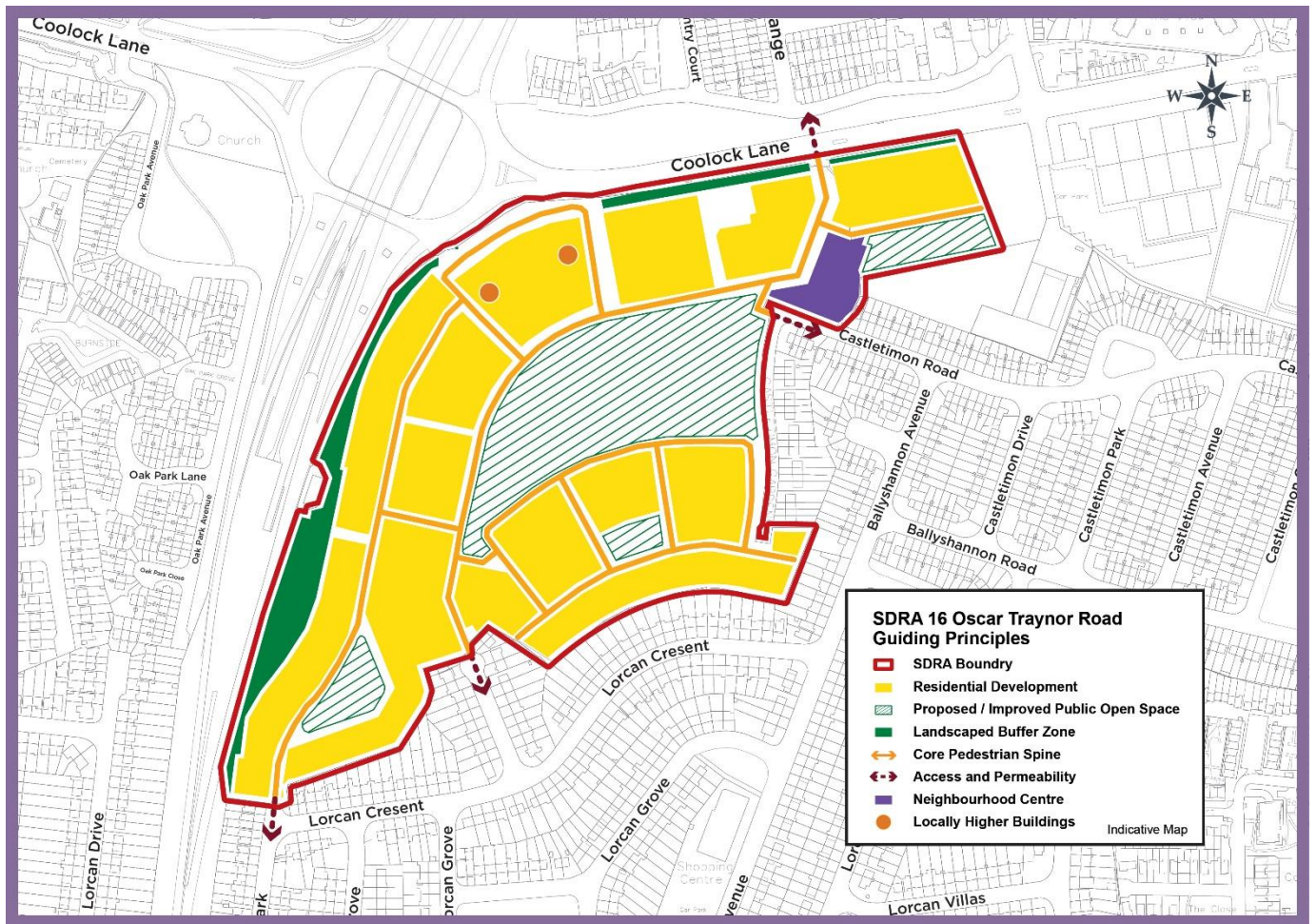
In response to the site specific road improvements included in the SDRA, the Development Plan is a forward looking document that sets out a future vision and framework for development. The inclusion of site specific road objectives are, therefore, considered necessary in order for any future development of the area to consider and appropriately adopt to the infrastructural requirements of the area. Prior to implementation of the roads objective detailed technical analysis will be carried out to inform the works proposed.

In relation to height, the SDRA does not set minimum heights, rather it states that height with a range of 6-10 storeys are generally more appropriate at the northern and western edge, scaling down where the site adjoins 2 storey housing.

With regard to the rezoning submission, please refer to Volume 2 of the CE Report for further details.

Chief Executive's Recommendation

No change proposed. The Guiding Principles for the SDRA are adequately set out in the Draft Plan.



Section 13.19 SDRA 17 – Werburgh Street

Summary

A submission was made in support of the guiding principles set out for SDRA 17. The provision of linkages and additional open space were all supported and welcomed. The submission from the OPW makes reference to the need for linkages between the Castle Complex and the surrounding area of Werburgh Street.

Chief Executive's Response

The CE welcomes the supportive submission and does not recommend any further amendments to the Guiding Principles in this respect.

Following the submission from the OPW, the City Council planning department have met with the OPW and the conservation section of DCC to discuss possible future linkages in this area. Understanding the context and the relationship between Werburgh Street Church, the Deanery, graveyard, the Castle Walls and the lands in-between, and the need for carefully planned pedestrian linkages, it is proposed to amend slightly the wording of the SDRA with regards to Hoey's Court. It is considered that the recreation of the lane of Hoey's Court (the birthplace of Johnathan Swift), in advance of any archaeological or movement analysis may hinder the design of this area. It is also considered that the representation of birthplace of Johnathan Swift can be articulated in a variety of forms, the design of which should be explored as part of this sites redevelopment.

Chief Executive's Recommendation

Chapter 13

Section: SDRA 17, Land Use & Connectivity and Open Space and Amenity

Page: 597

Amendment:

Under Land Use and Connectivity delete:

- ~~(To recreate the lie of Hoey's Cuort (the birthplace of Jonathan Swift).)~~
- To provide a new wall walk ~~(at Hoey's Court)~~, looking over Ship Street.

Amendment:

Under Open Space and Amenity add additional bullet point:

- {To represent in some form the birth place of Jonathan Swift, (No. 9 Hoey's Court), one of Ireland's greatest satirists and authors.}

Chapter 14: Land Use Zoning

Chapter 14: Land-use Zoning

Submission Number(s):

0001, 0003, 0009, 0010, 0011, 0013, 0015, 0021, 0023, 0024, 0026, 0027, 0030, 0033, 0035, 0037, 0038, 0041, 0044, 0049, 0055, 0056, 0059, 0069, 0081, 0089, 0095, 0099, 0114, 0123, 0127, 0129, 0130, 0149, 0186, 0239, 0264, 0266, 0284, 0285, 0287, 0316, 0327, 0328, 0329, 0330, 0331, 0332, 0334, 0335, 0336, 0345, 0346, 0359, 0365, 0371, 0384, 0386, 0388, 0389, 0395, 0396, 0397, 0398, 0399, 0400, 0401, 0402, 0404, 0405, 0413, 0415, 0416, 0417, 0418, 0419, 0420, 0421, 0422, 0423, 0424, 0425, 0426, 0427, 0430, 0431, 0432, 0433, 0435, 0436, 0437, 0438, 0439, 0440, 0441, 0442, 0443, 0444, 0445, 0446, 0447, 0448, 0449, 0450, 0452, 0457, 0460, 0461, 0462, 0463, 0464, 0466, 0467, 0468, 0469, 0470, 0471, 0472, 0473, 0474, 0475, 0476, 0477, 0478, 0479, 0481, 0483, 0484, 0485, 0486, 0487, 0488, 0489, 0490, 0491, 0492, 0493, 0494, 0495, 0496, 0497, 0500, 0501, 0502, 0503, 0504, 0505, 0506, 0507, 0508, 0509, 0510, 0511, 0513, 0514, 0515, 0516, 0517, 0518, 0519, 0520, 0521, 0522, 0523, 0524, 0525, 0526, 0527, 0528, 0529, 0530, 0531, 0532, 0533, 0534, 0535, 0536, 0560, 0577, 0580, 0587, 0588, 0590, 0599, 0604, 0609, 0627, 0628, 0631, 0633, 0634, 0640, 0641, 0642, 0643, 0644, 0646, 0647, 0650, 0652, 0660, 0661, 0662, 0663, 0664, 0666, 0667, 0668, 0669, 0670, 0671, 0672, 0674, 0675, 0676, 0677, 0679, 0680, 0682, 0683, 0684, 0685, 0686, 0687, 0688, 0689, 0692, 0694, 0695, 0696, 0697, 0699, 0700, 0702, 0703, 0704, 0705, 0706, 0707, 0708, 0709, 0710, 0711, 0712, 0713, 0714, 0715, 0716, 0717, 0719, 0720, 0721, 0722, 0725, 0730, 0731, 0733, 0734, 0735, 0737, 0743, 0756, 0757, 0758, 0762, 0763, 0764, 0768, 0769, 0770, 0771, 0772, 0776, 0777, 0778, 0779, 0780, 0781, 0783, 0785, 0786, 0787, 0788, 0789, 0790, 0791, 0792, 0793, 0794, 0795, 0796, 0797, 0798, 0799, 0802, 0804, 0806, 0807, 0808, 0809, 0812, 0814, 0815, 0816, 0817, 0818, 0819, 0820, 0822, 0827, 0828, 0831, 0833, 0835, 0837, 0838, 0839, 0841, 0842, 0843, 0844, 0845, 0847, 0848, 0849, 0850, 0851, 0852, 0854, 0855, 0857, 0858, 0859, 0861, 0862, 0863, 0865, 0867, 0868, 0880, 0887, 0888, 0891, 0892, 0894, 0895, 0897, 0898, 0899, 0900, 0901, 0902, 0903, 0907, 0912, 0918, 0919, 0921, 0927, 0932, 0934, 0936, 0937, 0938, 0941, 0942, 0943, 0945, 0951, 0952, 0954, 0955, 0957, 0958, 0960, 0961, 0963, 0965, 0966, 0967, 0968, 0972, 0974, 0975, 0976, 0977, 0978, 0980, 0983, 0984, 0985, 0986, 0987, 0988, 0989, 0990, 0991, 0992, 0993, 0994, 0995, 0996, 0997, 0998, 1000, 1001, 1005, 1007, 1009, 1010, 1013, 1014, 1015, 1016, 1017, 1018, 1020, 1027, 1031, 1033, 1034, 1036, 1039, 1041, 1043, 1044, 1047, 1052, 1053, 1054, 1056, 1057, 1058, 1060, 1062, 1068, 1074, 1075, 1078, 1079, 1080, 1092, 1097, 1099, 1101, 1102, 1103, 1105, 1106, 1107, 1108, 1110, 1111, 1112, 1113, 1114, 1116, 1117, 1118, 1120, 1125, 1126, 1127, 1128, 1129, 1131, 1132, 1133, 1134, 1135, 1136, 1137, 1138, 1139, 1140, 1141, 1142, 1143, 1144, 1151, 1152, 1160, 1161, 1162, 1164, 1165, 1166, 1169, 1171, 1173, 1174, 1175, 1177, 1180, 1181, 1182, 1183, 1184, 1185, 1186, 1188, 1189, 1190, 1196, 1198, 1199, 1200, 1202, 1203, 1206, 1208, 1209, 1210, 1211, 1213, 1214, 1216, 1217, 1219, 1220, 1221, 1223, 1224, 1225, 1227, 1228, 1229, 1231, 1232, 1233, 1234, 1235, 1237, 1239, 1240, 1242, 1243, 1244, 1246, 1247, 1250, 1251, 1252, 1253, 1254, 1255, 1256, 1257, 1259, 1260, 1261, 1262, 1264, 1265, 1267, 1269, 1270, 1273, 1274, 1276, 1277, 1280, 1282, 1285, 1286, 1287, 1289, 1291, 1292, 1294, 1295, 1296, 1297, 1299, 1301, 1303, 1306, 1307, 1312, 1313, 1315, 1323, 1324, 1327, 1339, 1370, 1386, 1393, 1396, 1397, 1400, 1401, 1403, 1406, 1409, 1410, 1411, 1413, 1414, 1415, 1417, 1422, 1423, 1425, 1429, 1431, 1434, 1435, 1437, 1438, 1439, 1441, 1443, 1446, 1448, 1455, 1457, 1475, 1476, 1482, 1483, 1489, 1490, 1494, 1499, 1502, 1503, 1506, 1510, 1512, 1514, 1515, 1516, 1520, 1522, 1525, 1526, 1535, 1537, 1538, 1539, 1540, 1542, 1543, 1544, 1546, 1547, 1548, 1549, 1553, 1557, 1558, 1559, 1564, 1565, 1570, 1575, 1576, 1579, 1581, 1582, 1589, 1596, 1597, 1601, 1602, 1603, 1622, 1627, 1633, 1634, 1640, 1641, 1643, 1645, 1647, 1649, 1650, 1653, 1655, 1664, 1666, 1669, 1670, 1671, 1681, 1682, 1684, 1690, 1695, 1697, 1700, 1704, 1711, 1714, 1717, 1719, 1726, 1727, 1731, 1733, 1734, 1736, 1741, 1746, 1750, 1758, 1764, 1766, 1770, 1771, 1772, 1773, 1774, 1775, 1780, 1781, 1782, 1784, 1785,

1798, 1808, 1826, 1827, 1831, 1836, 1843, 1846, 1854, 1865, 1868, 1869, 1872, 1873, 1877, 1883, 1888, 1889, 1890, 1891, 1894, 1895, 1896, 1897, 1898, 1899, 1900, 1901, 1902, 1903, 1904, 1905, 1906, 1907, 1908, 1909, 1910, 1911, 1912, 1913, 1914, 1915, 1916, 1917, 1918, 1919, 1920, 1921, 1922, 1923, 1924, 1925, 1926, 1927, 1928, 1929, 1930, 1931, 1932, 1933, 1934, 1935, 1936, 1937, 1938, 1939, 1940, 1941, 1942, 1943, 1944, 1945, 1949, 1950, 1951, 1952, 1953, 1954, 1955, 1956, 1957, 1958, 1962, 1963, 1964, 1965, 1966, 1967, 1968, 1969, 1970, 1971, 1973, 1974, 1975, 1976, 1977, 1978, 1979, 1980, 1981, 1982, 1983, 1984, 1985, 1986, 1987, 1988, 1989, 1990, 1991, 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2003, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2054, 2055, 2062, 2069, 2070, 2072, 2077, 2078, 2079, 2084, 2085, 2104, 2111, 2118, 2119, 2120, 2121, 2124, 2128, 2129, 2133

The CE notes that many of the submissions made under Chapter 14 related to requests for site-specific rezonings. These are dealt with by the CE under Volume 2 of this report.

Section 14.1 Introduction

Summary

The importance of integrating land-use planning with infrastructure delivery was a theme raised in a number of submissions, with many requesting that the Council examine the capacity of existing social and physical infrastructure in an area prior to rezoning land.

A number of submissions objected to further rezoning in particular areas of the city - such as Santry and Ashtown/ Pelletstown – the primary concerns being the risk of overdevelopment and issues around the rezoning process.

A large number of submissions made under Chapter 14 raise concerns regarding the Build to Rent (BTR) policies contained in the Draft Plan. Many of these request that 'BTR residential' not be a separate land use to 'residential' on the grounds that it is not a legally different land use and that it be included in the definition of 'residential' and permissible under key mixed use/ residential zonings.

A large number of submissions were received regarding the approach to land use zoning in the Draft Plan.

A submission received called attention to the role of the Elected Members in making rezoning decisions and the importance of the Council Executive working with the Members on any rezoning proposals.

One submission requested an overhaul of land-use zoning in Dublin, while another sought that zoning should remain unchanged for the duration of Plan on order to provide certainty. The latter submission also advised that where changes to zoning were proposed, local consultation would be required.

A submission made by An Post calls for more flexibility in land use zonings to support their operational needs and their role as an essential public service. They request that the Council consider including 'postal facilities' as a specific land use class that is permissible or open for consideration in all land use zoning categories.

One submission seeks the addition of 'community sports pitch' as a new permissible land use in all land use zonings.

Chief Executive's Response

The CE welcomes the submissions made in respect to land use zoning in the Draft Plan and notes the points raised in respect to the approach to land-use zoning in the city and the role of Elected Members in making rezoning decisions.

The CE wishes to advise that, once the Draft Plan is adopted, the agreed zonings will remain unchanged for the 2022-2028 Plan period unless subject to Variation under Section 13 of the Planning and Development Act 2000 (as amended), which is a separate statutory process which provides for full public consultation on any changes proposed.

Creating liveable neighbourhoods which provide for quality housing and social infrastructure is essential to delivering sustainable communities in line with the strategic objectives of the NPF and the RSES. The integration of land-use planning and infrastructure underpins the Council's approach to land use zoning which seeks to optimise the zoning of well serviced (by transport/ water/ drainage/ social infrastructure) but underutilised lands in built-up areas across Dublin City. This approach ensures that lands are brought into more intensive and efficient use and, allows for more appropriate zoning objectives at the local level. Furthermore, as highlighted in the Draft Plan, all designated development lands within the city area – including those in the North Fringe of the city - are considered to be appropriately serviced as per the Infrastructure Capacity Assessment (Appendix 10). The integration of development with the commensurate infrastructure is also addressed comprehensively under Chapter 5 under Policy QHSN 46 Community and Social Audit.

The CE notes the submissions that state that Build to Rent should be omitted as a separate use. The CE considers that a standalone reference to Build to Rent under the category of uses in Chapter 14 provides clarity and avoids confusion for both applicants and third parties. Build to Rent is clearly categorised as a different type of residential development in the Sustainable Urban Housing: Design Standards for New Apartments for Planning Authorities, December 2020 to which specific SPPR's apply. Its definition as a separate use is considered appropriate in this context. It is considered that this approach is also considered consistent with the Apartment Guidelines 2021 which state "*The promotion of BTR development by planning authorities is therefore strongly merited through specific BTR planning and design policies and standards*". It is also noted the classification of BTR as a specific housing typology under the use classes is not restricted to BTR and other residential typologies are also categorised including student accommodation, residential institution etc.

Postal facilities come under the definition of a 'Public Service Installation' in the Draft Plan and as such, are Permissible or Open for Consideration across a wide range of Development Plan zonings. On this basis, greater flexibility and/or the addition of a new 'postal facilities' land use class is not required. However, it is recommended that 'sports facility' be amended to include recreational uses throughout Chapter 14 and that the land use definition in Appendix 15 is updated.

Community sports pitches come under the definition of a 'Sports Facility' which are Permissible or Open for Consideration across a wide range of Development Plan zonings. On this basis, the addition of a new land use is not required.

Chief Executive's Recommendation

To amend 'sports facility' to 'sports facility and recreational uses' in all relevant zoning categories under permissible and open for consideration and to update land use definition accordingly.

Section 14.3 Permissible, Non-Permissible Uses and Unzoned Lands

Summary

Dublin's unzoned streets, roads and public spaces are the subject of one submission which states that it may be appropriate to provide an indicative zoning for all such places.

Chief Executive's Response

Section 14.3 (Permissible, Non-Permissible Uses and Unzoned Lands) of the Draft Plan deals with city lands not covered by a specific zoning objective. These lands are illustrated in white on the Draft Plan zoning maps and usually correspond with the location of the city's roads, bridges, train lines or other key infrastructure installations. Subsection 14.3.2 (Unzoned Lands) of the Draft Plan states that development proposals in respect of unzoned lands will be considered in accordance with the policies and objectives of the plan, with regard had to their compatibility with adjacent land uses and zonings.

Chief Executive's Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily deals with the issue raised.

Section 14.7 Primary Land-Use Zoning Categories

Section 14.7.1 Sustainable Residential Neighbourhoods – Zone Z1

Summary

A submission received in respect to Section 14.7.1 calls for 'BTR residential' to be a Permissible use on Z1 zoned lands.

Chief Executive's Response

The current dominance of the BTR sector in the city will have long term implications for the provision of adequate housing supply to meet the needs of the citizens of Dublin; please refer to CE response to OPR for further detail of this issue. The CE considers that a more balanced approach is required that allows for the continued development of this sector but with appropriate safeguards as per Policies QHSN38 and QHSN39 in Section 5.5.7 (Specific Housing Typologies) and Section 15.10 of the Draft Plan. For this reason, the CE recommends that 'BTR residential' remain an Open for Consideration use on Z1 zoned lands.

Chief Executive's Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily responds to the issue raised.

Section 14.7.2 Residential Neighbourhoods (Conservation Areas) – Zone Z2

Summary

One submission seeks that ‘embassy – office’ uses be limited in Z2 zoned areas whilst another calls for ‘BTR residential’ to be a Permissible use on Z2 zoned lands.

Chief Executive’s Response

With regard to ‘embassy (office)’ use on Z2 lands, it is acknowledged that whilst the principal land use in residential conservation areas is housing, they can also accommodate a limited range of other secondary and established uses such as ‘embassy (office)’. In considering other uses, the guiding principle is to enhance the architectural quality of the streetscape and the area. On this basis, the CE recommends that ‘embassy (office)’ remain Open for Consideration on Z2 lands.

As set out in the CE response under Section 14.7.1 above, the CE recommends that ‘BTR residential’ remain Open for Consideration on Z2 zoned lands.

Chief Executive’s Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Section 14.7.3 Neighbourhood Centres – Zone Z3

Summary

A submission in respect to the Z3 land-use zoning category sought the designation of additional neighbourhood centres in the city’s mono-functional employment locations, between the inner core and canals, in order to provide for sustainable mixed-uses.

Chief Executive’s Response

The development of appropriate Z3 neighbourhood centres is dealt with in Chapter 7 (The City Centre, Urban Villages and Retail) of the Draft Plan which aligns the retail hierarchy for the city to the settlement hierarchy of the Core Strategy. These centres are defined as being at the heart of their local communities; providing a focus for local activities; sustainable urban living; access to local shops, services, community services’ information, healthcare, amenities and local employment. These local “shopping parades” are complemented by the larger urban villages and by corner shops/cafes etc., all of which are promoted throughout the city.

In the past, large areas of industrial lands were developed in the city often without local shops and services. However, following the Z6 and Z7 lands study as part of the 2016 Development Plan, a number of remaining larger estates are referenced in the Draft Plan for regeneration; part of which will require a mixed-use approach and provision for local neighbourhood centres- all undertaken as part of a locally focused plan that will be placed on public consultation.

It is, therefore, considered that the most appropriate approach to address the issue of local neighbourhood facilities in industrial areas is as part of a local plan or required masterplan as required in the Draft Plan.

Chief Executive's Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily responds to issue raised.

Section 14.7.4 Key Urban Villages and Urban Villages – Zone Z4

Summary

A number of submissions received in respect to Section 14.7.4 concerned the Draft Plan's Key Urban Villages (KUVs).

One submission received states that KUV's do not have to be identical to the Level 3 retail centres set out in the Regional Spatial and Economic Strategy (RSES) notwithstanding the fact that the identification of KUV (District Centres) is completed at the regional level.

A number of submissions seek the designation of additional KUVs in areas such as Dorset / Bolton Street and Environs, Artane, Stoneybatter, Drumcondra and Glasnevin.

Another submission raises an issue with the Omni Shopping Centre in Santry being designated as a KUV on the basis of its substandard accessibility/ public realm and the low value employment that it provides, and considers that its designation has been unduly influenced by SHD developments.

A submission notes that 'office' uses are listed as both Permissible and Open for Consideration on Z4 lands and seeks clarification on same while recommending that 'office' uses remain Permissible under Z4.

It was requested by one submission that 'BTR residential' be a Permissible use on Z4 zoned lands.

Chief Executive's Response

The designation of KUVs and the relationship between the RSES and the city's retail hierarchy are all dealt with by the CE in response to submissions made under Section 7.5.1 General Retail Policy and Sections 5.0 and 9.1 of The Retail Strategy (Appendix 2).

The CE notes that 'office' use is listed as both permissible and open for consideration on Z4 lands and recommends that a minor correction made to the text of the Draft Plan to clarify that 'office' uses are Permissible on Z4 lands.

The CE considers that the BTR typology should primarily be concentrated in prime inner city areas, in areas of high intensity employment use and within 500m of major public transport interchanges. On this basis, the CE recommends that 'BTR residential' remain Open for Consideration on Z4 zoned lands to ensure that their focus remains as centres for mixed services facilities, but subject to appropriate safeguards as per Policies QHSN38 and QHSN39 in Section 5.5.7 (Specific Housing Typologies) and Section 15.10 of the Draft Plan.

Chief Executive's Recommendation

Chapter 14

Section: 14.7.4 Key Urban Villages and Urban Villages – Zone Z4

Page 615, Z4 - Open for Consideration Uses

Amendment:

Z4 – Open for Consideration Uses

Advertisement and advertising structures, betting office, Build to Rent residential, civic and amenity/recycling centre, conference centre, embassy residential, funeral home, garage (motor repair/service), household fuel depot, internet café/call centre, laundromat, nightclub, ~~(office,)~~ outdoor poster advertising, postal hotel/motel, shop (factory shop), shop (major comparison), student accommodation, warehousing (retail/non-food)/retail park.

Section 14.7.5 City Centre – Zone Z5

Summary

A number of submissions concern 'BTR residential' being permitted on the Z5 zoned lands. A number of differing viewpoints are expressed, with one submission calling for 'BTR residential' to be a Permissible use on Z5 lands while another seeks that it is only Open for Consideration under the zoning.

One submission expressly calls for ground floor residential to be prohibited under the Z5 zoning.

Chief Executive's Response

The CE notes the range of submissions made in respect to 'BTR residential' on Z5 lands, with some supporting BTR as a Permissible use and others seeking that it is only Open for Consideration. The CE is of the view that the Z5 zoning objective is an appropriate place for the BTR form of residential. The city centre is a highly accessible location with close proximity to existing and planned public transport. It is also a location that is proximate to centres of employment as well as hosting a more a more transient workforce working in the knowledge-based economy. On this basis, the CE recommends that 'BTR residential' should be a Permissible use under the Z5 zoning objective.

Concerns raised with regard to ground floor residential on Z5 lands are noted. The Z5 zoned areas of the city does include small residential streets where ground floor residential is more appropriate. Nevertheless, it is policy that ground floors should have higher than normal floor to ceiling height to cater for non-residential uses, to be considered on a case by case basis. For this reason, the CE recommends that prohibition of ground floor residential uses on Z5 lands is unnecessary.

Chief Executive's Recommendation

Chapter 5

Section 14.7.5 City Centre – Zone 5

Page: 616-617

Amendment:

Z5 – Permissible Uses

Amusement/leisure complex, beauty/ grooming services, bed and breakfast, buildings for the health, **{Build to Rent residential,}** safety and welfare of the public, café/tearoom, childcare facility, civic offices, community facility, conference centre, craft centre/ craft shop, cultural, creative, artistic,.....

Z5 – Open for Consideration Uses

Advertisement and advertising structures, betting office, **(Build to Rent residential)**, car park, car trading, civic and amenity/recycling centre, household fuel depot, laundromat, motor sales showroom, outdoor.....

Section 14.7.6 Employment/ Enterprise – Zone Z6

Summary

A number of submissions were received regarding the Z6 zoning objective. Several raised concern that 'residential' is no longer a Permissible or an Open for Consideration use under the zoning objective and deemed this to be contrary to Government policy. One submission queried the rationale for its removal and noted potential conflict with regeneration objectives for SDRA 7 (Heuston and Environs) in addition to the standardised zoning sought under Draft Development Plan Guidelines. Another submission raised concerns that such an approach would undermine the delivery of housing and significantly reduce the quantum of land available for residential development in the city. One submission seeks to retain 'residential' as Open for Consideration under the Z6 zoning in order to allow for purpose-built residential accommodation on-site to support business requirements. It is asserted in some of the submissions that to allow for residential as 'open for consideration' is more consistent with the mixed-use philosophy to support the 15-minute city concept as identified in Chapter 2 (Core Strategy).

One submission raises concerns regarding the omission of 'embassy – residential' use within the Z6 zoning matrix and that it should be included as an Open for Consideration use. It is stated that an element of residential use related to the primary 'embassy office' use is not uncommon in diplomatic chanceries in Dublin and is considered complementary to the operations of an embassy. There is support for the retention of 'embassy – office' as Permissible under the Z6 zoning objective.

Some submissions raise concerns in respect to the detailed review of all Z6 zoned lands in the city that was undertaken to determine which lands would be suitable for a change in zoning. One submission raises specific concerns about the subsequent rezoning of lands from Z6 to Z10 and the knock-on implications for the replacement of certain lower order uses with higher order uses in mixed enterprise and employment areas – such as Greenmount Industrial Estate. Another highlights the perceived loss of diversity/ overall use mix that results from such zoning changes and the negative impact on arts/cultural uses, small and medium sized businesses and leisure uses.

It is suggested in some submissions that the Z6 zoning objective needs to be modified to provide for a mixed-use approach, particularly in areas where there is a concentration of non-functional office use.

Other submissions suggest that data centres should be a Permissible use under the Z6 zoning objective.

Chief Executive's Response

On foot of objective CEE04 of the current Dublin City Development Plan 2016-2022, a detailed review of all Z6 zoned lands in the city was undertaken to determine which lands had redevelopment potential and would be suitable for a change in zoning to facilitate more compact growth. This resulted in a series of variations to the current Plan, where a number of Z6 lands were rezoned to Z1 and Z10 with the new zonings offering much greater support and protection for existing uses in many instances (see also CE response on Section 14.7.10). As part of the preparation of the Draft Plan, a further review was undertaken of Z6 lands and further sites recommended for a change in zoning due to the fact that they were no longer considered optimal locations for extensive employment use. Further Z6 sites have also been recommended for a change in zoning under this CE report.

Chapter 2 of the Plan also identifies that land at the Naas Road and Dublin Industrial Estate will be the subject of a statutory plan over the life of the new Plan. A statutory plan is considered essential for these industrial/employment areas in order to ensure the planned and coherent development of these strategic lands. It is envisaged that further Z6 lands may come forward for a change in zoning as part of the statutory plan process.

The CE considers that the remaining Z6 land bank represents the core strategic employment lands in the city. Such lands are an important asset for the city and provide an important local employment function. Many accord with the Strategic Employment Areas identified under MASP. A wide range of employment uses are permitted and open for consideration under the zoning objective, and support the 15-minute city approach.

The CE does not consider that such lands are appropriate for residential use of any kind. To permit residential use as either a Permissible or Open for Consideration use would undermine the primary purpose of these lands which is to support investment, job creation and economic growth in the city together with the Draft Plan's Core Strategy. It is noted that the submission of the OPR supports the approach in the Draft Plan and states:

"It is noted that the intent is to restrict residential development and preserve any remaining Z6 – Employment / Enterprise zoned land primarily for employment uses with residential development no longer open for consideration on Z6 land. The Office supports this approach having regard to the previous strategic study of all Z6 and Z7 lands which resulted in a number of variations to the current Dublin City Development Plan to facilitate the repurposing and redevelopment of appropriate lands for more intensive and appropriate mixed-use development."

The CE recommends, therefore, that no amendment is made to the Z6 zoning objective in this regard.

With regard to embassy residential use, it is acknowledged that in limited circumstances an ancillary residential element may form part of an embassy premises located on Z6 lands and in this context, the CE recommends the inclusion of this use as one that is open for consideration.

With regard to data centres, the CE notes that data centres are in the Draft Plan only identified as a permissible use under the Z7 zoning objective. Having regard to the fact that the Z6 objective relates to employment generating land uses, the CE considers that it would be appropriate that data centre is an open for consideration use under the Z6 zoning objective and recommends a textual amendment in this regard, particularly given the criteria set out in section 14.3.1 of the Draft Plan, including the requirements to address energy concerns, whereby the planning authority must be satisfied that the proposed development would be compatible with

the overall policies and objectives for the zone, would not have undesirable effects on the permitted uses, and would otherwise be consistent with the proper planning and sustainable development of the area. These criteria, in addition to those set out under section 15.14.14, are considered sufficiently robust to ensure the appropriate development of data centres in the city over the life of the Plan.

Chief Executive's Recommendation

Chapter 14

Section: 14.7.6 Employment/Enterprise – Zone Z6

Page 619, Z6 - Open for Consideration Uses

Amendment:

Z6 – Open for Consideration Uses

Advertisement and advertising structures, amusement and leisure complex, beauty/ grooming services, betting office, boarding kennel, buildings for the health, safety and welfare of the public, car trading, community facility, craft centre/ craft shop, crematorium, {data centre, embassy residential}, financial institution, funeral

Section 14.7.7 Employment (Heavy) – Zone Z7

Summary

The Z7 land use zoning is supported by many of the city's large employers and industrial operators.

The submission from Diageo commends the Draft Plan's reference to the Diageo/ Guinness Complex and offers support for Z7 zoning objective and supporting text. The submission also calls for further policy support to ensure that applications for noise sensitive uses in the vicinity of Z7 zoned land, such as residential and hotel uses, are required to demonstrate that they are sufficiently acoustically insulated and will not undermine the ability of the Z7 land to deliver upon its zoning objective.

The submission made by Dublin Port Company also supports the Z7 zoning objective and calls on the Council to consider broadening its use mix/ use definitions in order to provide greater flexibility.

Other submissions call for the Dublin Port lands to be zoned while another submission asks the Council to reconsider its zoning proposals for the Poolbeg Peninsula.

The Land Development Agency note that the majority of land owned by Dublin Port remains zoned Z7, while a number of areas are proposed for Z6 Enterprise and Employment zoning. In this regard, they note that they will continue engagement with Dublin Port Company and relevant government departments with a view to identifying suitable areas in the port for potential future residential development and that any such proposals, will likely, be facilitated by a future variation to the new Development Plan.

One submission seeks changes to the Z7 zoning objective to bring it in line with the wording of 2011-2017 Dublin City Development Plan.

Chief Executive's Response

The CE notes the support for Z7 policy approach in the Draft Plan and is satisfied that sufficient flexibility is provided in its use mix and definitions to reflect their role in providing for the city's critical infrastructure, industry and employment.

Having reviewed the wording of the Z7 zoning objective in the Draft Plan with that of the 2011-2017 Dublin City Development Plan, the CE is satisfied that the additional reference to 'port-related activities' is appropriate and in keeping with the wording in the current 2016-2022 Development Plan.

The CE notes that the majority of the Dublin Port and Poolbeg Peninsula lands are zoned Z7 under the Draft Plan in line with their heavy industry/ employment/utility use, with a smaller proportion zoned Z6, Z9 and Z14, and recommends that no change is made to these zoning designations. This aligns with the broader strategic objectives of the plan which identifies Poolbeg as a Sustainable Infrastructure Hub (Policy SI52 refers.)

The CE further notes the submission made by the Land Development Agency in respect to the potential for Dublin Port Lands to come forward for residential development in the future, subject to an appropriate zoning variation to facilitate same. This matter is addressed further in the CE summary, response and recommendations with regard to Chapter 6.

The Draft Plan is cognisant of the need to protect Z7 zoned lands from other non-compatible uses that could conflict with and limit the expansion or adaption of their primary uses. The issue of noise sensitive uses is dealt under Chapter 15 (Development Standards) whereby proposals for new developments are required to demonstrate that they are sufficiently acoustically insulated with details of noise insulation measures required to be submitted at planning application stage. The policy in this chapter also makes provision for the submission of a noise impact assessment and mitigation plan for proposals close to designated noise zones and other noisy places, such as busy streets / railway lines, and this can also be understood to include Z7 lands. Please also refer to the CE recommendation with respect to Chapter 15 where new policy with respect to Dublin Port under section 15.19 is recommended.

Chief Executive's Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Section 14.7.8 Georgian Conservation Areas – Zone Z8

Summary

A submission seeks amendments to the Z8 land-use zoning in order to define overconcentration of office uses and to support greater residential uses.

Chief Executive's Response

The overall objective of the Draft Plan is to promote balanced, sustainable and mixed-use development in the city. The Z8 zoning promotes residential use as the majority use, and this is complemented by the DCC Guidelines including the 'South Georgian Townhouse Re-Use Guidance Document'. Notwithstanding this approach, it is clearly stated in Section 14.7.8 that "Offices or the expansion of existing office use may be permitted where they do not impact

negatively on the architectural character and setting of the area and do not result in an over-concentration of offices within a Z8 zoned area.” The definition of what constitutes over-concentration would be most appropriately dealt with on a case-by-case basis as part of the assessment of a planning application.

Chief Executive’s Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Section 14.7.9 Amenity/Open Space Lands/Green Network – Zone Z9

Summary

Submissions object to the exclusion of residential and commercial development from the Open for Consideration uses under the Z9 objective. Another submission raises concern regarding the limited range of commercial uses Open for Consideration under the objective. One submission raises objections to the caveats for one-off residential/ commercial developments and seeks further clarification to paragraph 14.3.1 (Permissible and Non-Permissible Uses).

One submission calls for ‘creative spaces’ and ‘artists’ workspaces’ be open for consideration under Z9, while another seeks limited residential/ commercial development on Z9 lands in certain specific and exceptional circumstances and that recreational uses and facilities (including buildings and sports stadia where appropriate) be allowable under Z9.

A number of submissions discuss sporting and community uses on Z9 lands, with many supporting the Draft Plan zoning in respect to sport and leisure facilities. One submission questions whether the redefinition of Z9 is explicitly worded to preserve current and past community and sporting uses of institutional land.

The need to protect the city’s Z9 landbank from erosion is raised in a number of submissions. Two submissions received raise an issue with the provision made for limited residential or commercial development in specific and exceptional circumstances and call for this provision to be removed. One submission makes a suggestion for how the criteria allowing for exceptional development can be further strengthened to ensure users/ occupiers of the lands/ facilities are identified, consulted and not detrimentally impacted.

Another submission requests greater protection for Z9 lands given their valuable greenspace and ecosystem services role with a further submission supporting the concept of a greenbelt to contain the further outward expansion of Dublin City.

One submission raises an issue with the inadequate provision of public open space and sports facilities in certain parts of the city, and suggests that a potential solution may be the designation of micro green area zonings within communities, LAPs and planning applications.

Chief Executive’s Response

The recognition of the role of the Z9 landbank in providing for valuable public green space, sports and leisure functions and ecosystem services is welcomed by the CE.

The CE wishes to clarify that community and sporting uses on institutional land are dealt with under the CE response on Section 14.7.14 (Community and Social Infrastructure – Zone Z15) and that recreational uses and facilities come under the definition of ‘club house and associated

facilities' which is already Open for Consideration under Z9. Notwithstanding this, the CE notes that 'club house and associated facilities' is listed as both Permissible and Open for Consideration on Z9 lands and recommends that a minor correction be made to the text of the Draft Plan to clarify that this use is permissible on Z9 lands where associated with the primary Z9 objective.

The Z9 zoning objective is intended to provide protection to the city's recreational amenity and open spaces. Such amenities provide essential community recreational functions and are an essential component of healthy placemaking. The preservation of such assets, many of which also have an important biodiversity function, is essential, particularly as the city continues to densify. In this context, the CE considers that it is appropriate that development, including any commercial, residential or other development is strictly controlled. This has been the approach of the City Council over successive development plans. The CE considers that the Draft Plan is clear as to the circumstances as to when commercial, residential or other types of development may be considered and in this context considers that no amendment to paragraph 14.3.1 or paragraph 14.7.9 in this specific regard is required. The CE however, recommends some additional amendments to the wording of the Z9 zoning objective to provide greater clarity, and consistency of language with other zoning objectives.

The Draft Plan has sought to protect and improve the provision of open space and sports facilities under the Z9 zoning objective, with new greenspaces/ open spaces to be provided as part of the city's key Strategic and Regeneration Areas (Chapter 13) and in new residential developments where 10-25% of site area will be required as open space in accordance with the policy approach set out in Sections 10.5.4 (Parks and Open Spaces), 15.6.12 (Public Open Space and Recreation) and 15.8.6 (Public Open Space). In line with the plan's commitment to healthy placemaking, the provision of active recreation and sports facilities in new neighbourhoods and public spaces will also be supported (see Section 10.5.8 (Sport, Recreation and Play), Policies GI45-49). In addition, the plan includes a number of policies to promote urban greening including Policy GI5.

Chief Executive's Recommendation

Chapter 14: Land Use Zoning

Section: 14.7.9 Amenity/Open Space Lands/Green Network – Zone Z9

Page: 622, 5th paragraph of Section 14.7.9 as follows:

Amendment:

In certain specific and exceptional circumstances, where it has been demonstrated to the satisfaction of the planning authority, some limited degree of residential or commercial development may be permitted on Z9 land subject to compliance with the criteria below:

- Where it is demonstrated that such a development would be essential in order to ensure the long-term retention, enhancement and consolidation of a sporting facility on the site.
- Any such **{residential/commercial}** development must be **{subordinate}** **(ancillary)** in scale and demonstrate that the primary sporting land use on the site is not materially eroded, reduced or fragmented.
- ~~(Only a once-off development in respect of the site/lands in the ownership of and/or use by the sporting facility will be considered.)~~

- In all cases, the applicant shall submit a statement, ~~(as part of a legal agreement under the Planning Acts,)~~ demonstrating how the sports facility will be retained {and enhanced} ~~(long term)~~ on site.
- {In proposals for any residential/commercial development, the applicant must demonstrate that the future anticipated needs of the existing use, including extensions or additional facilities would not be compromised.}
- In all cases {(with the exception of land disposed of prior to the adoption of the Plan),} the applicant shall be the sports club owner ~~(/occupier,)~~ {or have a letter of consent from the owner.}

Chapter 14

Section: 14.7.9 Amenity/Open Space Lands/Green Network – Zone Z9

Page 622, Z9 – Permissible Uses

Amendment:

Z9 – Permissible Uses

Allotments, cemetery, club house ~~(and)~~ {associated with the primary Z9 objective,} municipal golf course, open space, public service installation.

Chapter 14

Section: 14.7.9 Amenity/Open Space Lands/Green Network – Zone Z9

Page 622, Z9 – Open for Consideration Uses

Amendment:

Z9 – Open for Consideration Uses

Boarding kennel, café/ tearoom, caravan park/camp site (holiday), car park for recreational purposes, childcare facility, civic and amenity/recycling centre, community facility, ~~(club house and associated sports facilities,)~~ craft centre/craft shop, crematorium, cultural/recreational

Section 14.7.10 Inner Suburban and Inner City Sustainable Mixed-Uses – Zone Z10

Summary

Concerns are raised in some submissions regarding the Z10 zoning objective as it is considered that the current wording that a maximum of 70% of a Z10 zoned site can be given to one particular use, with the remaining portion of the site (30% or greater) to be given to another use is overly prescriptive and inconsistent with approach taken to Z4/Z5 zonings in the Draft Plan and to CE's Assessment of Z16. It is suggested in some submissions that there should be greater flexibility for smaller infill Z10 zoned sites in respect to use mix requirements.

It is suggested in one submission that smaller applications on sites of less than 0.5 ha should be considered on their merits on a case by case basis where it is supported by an audit of surrounding uses within the immediate vicinity of the site. Others suggest that the objective should be amended to allow for a more qualitative assessment of a mix of uses across a Z10 land bank instead of on individual sites. Other submissions state that the requirement does not consider a scenario where there are multiple ownerships and may result in ad-hoc piecemeal

development. Other submissions seek clarity on whether the masterplan applies to the entire Z10 landholding or to individual sites and whether it relates to site area or GFA. One submission suggests that the mix requirement should be reduced to 10%.

Other submissions raised concern regarding the loss of certain lower order uses and their replacement with higher order uses when lands are rezoned from Z6 to Z10. It is noted that this may result in a loss of diversity and mix of uses including arts/cultural uses, small and medium sized businesses and leisure uses.

One submission calls for BTR to be a permissible use on Z10 zoned lands.

Chief Executive's Response

As noted in the Draft Plan, the purpose of the Z10 zoning objective is to promote mixed use in order to deliver sustainable patterns of development in line with the principles of the 15-minute city. The proximity principle is a core concept in the Draft Plan and it is considered reasonable and appropriate to prescribe an appropriate mix of uses on such lands. The CE notes the comments made that the approach conflicts with that taken with regard to Z16. However, the CE considers that given the wide variety of uses permissible and open for consideration under the Z10 zoning objective, that there is sufficiently flexibility to ensure that a mixed-use approach is pursued on such lands and is not an onerous requirement. The CE however, recommends greater flexibility, that the objective should be amended to require a range of 30% to 70% and that this approach ensures that the objective is not prescriptive.

The CE acknowledges however, that such a mix requirement may be too restrictive on small infill sites and recommends a textual amendment to provide greater flexibility for such sites.

It is intended that the land use mix requirements relate to site area not GFA and relate to the Z10 landholding as a whole, rather than individual sites within. Clarification to the text is recommended in this regard. The Draft Plan is clear on which specific sites require a masterplan. In addition, the masterplan requirement applies to sites over 1ha. Please see response to the OPR in relation to the CE recommendation in relation to masterplans.

The concerns regarding loss of lower order uses are noted. However, the zoning matrix provides for a wide variety of uses within Z10 lands and the mix requirements provides an opportunity for such uses to be accommodated on the Z10 lands if redeveloped.

Chief Executive's Recommendation

Chapter 14: Land Use Zoning

Section: 14.7.10 Inner Suburban and Inner City Sustainable Mixed-Uses – Zone Z10

Page: 623, 2nd and 4th paragraphs of Section 14.7.10 as follows:

Amendment:

In order to ensure that a mixed-use philosophy is adhered to on Z10 zoned lands, the focus will be on delivering a mix of residential and commercial uses. ~~(and it)~~ ~~[T]~~ here will be a requirement that a range of 30% to ~~(maximum of)~~ 70% of the area of ~~(a)~~ Z10 zoned ~~{lands}~~ ~~(site)~~ can be given to one particular use, with the remaining portion of the ~~{lands}~~ ~~(site (30% or greater))~~ to be given over to another use or uses (e.g. residential or office/employment). For very small sites, typically less than 0.5ha, flexibility on mix requirement may be considered on a

case by case basis, where it can be demonstrated that the proposal would not result in an undue concentration of one particular land use on the Z10 landholding as a whole.}

The primary uses supported in this zone are residential, office and retail with ancillary uses also facilitated where they deliver on the overall zoning objective.

There will be a requirement that for any significant scheme (on Z10 zoned lands greater than **{1} (0.5)** ha in size) seeking to increase densities and/or height, that a masterplan is prepared (see also Appendix 3). The requirement to prepare a masterplan in respect of future development will also specifically apply to Z10 zoned lands at Malahide Road, Harmonstown Road, Goldenbridge Industrial Estate, 110-114 Cork Street, Glenview Industrial Estate and Brickfield House/Sunshine Estate.

Section 14.7.12 Institutional Land (Future Development Potential) – Zone Z12

Summary

One submission calls for 'BTR residential' to be a Permissible use on Z12 zoned lands while another seeks that it is removed all together.

Multiple submissions were received in respect to the quantum of open space provision on Z12 lands. One submission supports the open space requirements for Z12 in the Draft Plan, while another submission supports the retention of the existing 20% public open space requirement for Z12 zoned lands in the current 2016-2022 Development Plan and seeks that the masterplan requirement is removed.

Chief Executive's Response

The CE notes the differing views in respect to the facilitation of BTR on Z12 zoned lands.

As per the CE response given on 14.7.1 above, the current dominance of the BTR sector in the city will have long term implications for the provision of adequate housing supply to meet the needs of the citizens of Dublin. The CE considers that a more balanced approach is required that allows for the continued development of this sector but with appropriate safeguards as per Policies QHSN38 and QHSN39 in Section 5.5.7 (Specific Housing Typologies) and Section 15.10 of the Draft Plan. For this reason, the CE recommends that 'BTR residential' remain an Open for Consideration use on Z12 zoned lands.

The CE notes the submissions made in respect to the nature and quantum of open space provision on Z12 zoned lands under the Draft Plan.

The Council is committed to sustainable land management and resource efficiency in keeping with the NPF and RSES. Whilst urban consolidation presents a significant opportunity to densify the city, it is important that this increased development potential is counterbalanced with the safeguarding of established social and community uses and the provision of additional social and community infrastructure - such as communal open space – on development lands. For this reason, having regard to the increasing density likely to be achieved on the city's Z12 development lands, and their long established function for social and community infrastructure which will be diminished through their redevelopment, it is appropriate that a larger quantum of open space is also provided on these lands.

The CE is of the view that a masterplan is the most appropriate policy tool for providing a clear vision for the future development of a Z12 land holding. In addition, the preparation of a masterplan is considered integral to the co-ordinated and integrated provision of the 25% public open space requirement associated with any residential development on Z12 lands.

Chief Executive's Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Section 14.7.13 Strategic Development and Regeneration Areas– Zone Z14

Summary

One submission seeks that 'BTR residential' be Open for Consideration under Z14 while another submission calls for it to be fully a Permissible use on Z14 zoned lands.

Chief Executive's Response

The CE notes the conflicting submissions made in respect to BTR on Z14 lands, with one supporting 'BTR residential' as an Open for Consideration use and another seeking that it is fully Permissible.

It is considered that the Z14 zoning objective, is an appropriate place for the BTR form of residential tenure given that Z14 lands are in highly accessible locations with close proximity to existing and planned public transport. They are also areas that are either proximate to, or planned for, significant economic and employment development. The specific nature of a Z14 - Strategic Development and Regeneration Areas (SDRAs) - zoning objective is such that regeneration needs a mixed tenure approach. 'BTR residential' is one such typology that can be part of a mixed tenure approach and the CE considers that is appropriate as a Permissible use under the Z14 zoning subject to compliance with Policies QHSN38 and QHSN39 in Section 5.5.7 (Specific Housing Typologies) and Section 15.10 of the Draft Plan. A textual amendment is recommended in this regard.

Chief Executive's Recommendation

Chapter 14

Section: 14.7.13 Strategic Development and Regeneration Areas– Zone Z14

Page: 628, Permissible and Open for Consideration Uses

Amendment:

Z14 – Permissible Uses

Assisted living/retirement home, beauty/ grooming services, bed and breakfast, buildings for the health, **{Build To Rent residential,}** safety and welfare of the public, café/ tearoom, childcare facility, community facility, conference centre, craft

Z14 – Open for Consideration Uses

Advertisement and advertising structures, betting office, (~~Build To Rent residential~~), car park ancillary to main use, car trading, civic and amenity/recycling centre, cultural, creative and artistic enterprises and uses

Section 14.7.14 Community and Social Infrastructure – Zone Z15

Summary

A number of submissions in support of the Z15 zoning were made. However, there were also a number raising concerns regarding the Z15 zoning objective. The main issues raised can be summarised as follows:

Concern was expressed in a number of submissions that the zoning objective will make it more difficult to obtain planning permission for residential development on land zoned Z15, thereby increasing the risk of vacancy. It is submitted that the draft Z15 zoning objective places unnecessary constraints on the development of housing which is encouraged in national policy including the National Planning Framework. It is stated that the draft zoning objective is a blunt development control instrument which doesn't take account of site particulars or circumstances. It is stated that the proposed Z15 zoning objective does not acknowledge that there are large areas of surplus Z15 zoned land which are no longer required to serve the existing or future needs of the neighbourhoods they are located within, and are highly suitable for residential development in the short to medium term. It is detailed that residential, student, commercial and office use should be stated as open for consideration uses under the Z15 objective.

It is submitted that the term 'highly exceptional circumstances' hinders the ordinary planning for improved facilities for long established institutions and should be removed. It is also stated that the requirement that any residential/office development must demonstrate that it is ancillary in scale to the primary social/community use should be omitted having regard to the fact that the residential element may have to be significantly larger than the primary use, to fund both the delivery of housing and new facilities. It is also detailed in some submissions that the requirement for only a 'once off' development should be omitted, and that not all institutions will be required in the 'long term'.

It is stated that there is an inadequate rationale as to why the Z15 zoning objective has been amended, that it is unnecessarily restrictive and unlawful due to its unreasonableness. It is considered in some of the submissions that the zoning amendment may be a breach of constitutional and human rights and that it is disproportionate, with a number referencing the Judicial Review challenge taken against the Z15 zoning under the 2011-2017 Development Plan. It is stated that the Draft Plan should retain the wording set out in the 2016 Plan. Some submissions set out detailed suggested textual amendments to the existing objective.

A number of submissions consider that the zoning objective would impede the delivery of social and affordable housing and that there should be greater flexibility. Other submissions outline that it is anticipated that there will be a significant fall in primary level school enrolments nationally over the next two decades. It is submitted that this will result in the rationalisation of schools in Dublin and that the new City Development Plan should support schools that require alternative viable uses in the coming years.

It is stated in some submissions that many of the Z15 lands are operated by a charitable trust which operates as a registered charity. Where established under a deed of trust, this requires the trustees of the trust to apply all of the property of the trust in furtherance of that purpose

except for moneys expended in the management of the trust. It is stated that a charitable trust is obliged to ensure its property portfolio advances its charitable purpose.

It is detailed that schools operated by charitable trusts rely on donations or income from property assets to generate the funds to make major improvements. The disposal of surplus lands and buildings in one location is often used to fund investment in another school within the trust. Concerns are raised regarding the wording of the Draft Plan which states that it must be demonstrated that an alternative social or community use is not viable before any rezoning can occur. It is considered that alternative social and community uses would generate significantly less value and, therefore, constrain investment that can be made in other locations. It is considered that the requirement to prepare a masterplan is onerous and will reduce the development values of lands, with some submissions raising specific concerns in respect to the resourcing and expertise to prepare masterplans prior to the disposal of lands.

It is further submitted that the Draft Plan does not cater for the needs of multi-school trustees. For example, a school in significant need of investment may not benefit from surplus land or buildings. Another school in the trust may have excess land but is not in need of major investment. The Draft Development Plan text would prejudice a trust's ability to manage their portfolio adequately and direct funds to where they are needed most.

With regard to the cessation of a Z15 use and the requirement that a variation to the plan would be required to demonstrate why the land is not viable or suitable for social and community use, it is submitted that this requirement is not practical to demonstrate and could amount to a complete restriction on the use of the land. It is stated in one submission that the requirement for a variation is excessive and disproportionate and that the redevelopment of land is highly contentious in Ireland and this additional barrier, would mean that such proposals are unlikely to be passed. It could result in lands, which are suitable for redevelopment, remaining permanently underdeveloped. It is further detailed in a submission that by imposing this restriction, that DCC are seeking to place a planning use on the land notwithstanding the actual planning use may have ceased. It is also submitted that the wording of the plan removes other legal avenues for obtaining planning permission such as the material contravention procedure.

Submissions raise concerns regarding the requirement for a legal agreement to demonstrate how the institutional facility will be retained long term on the site. It is submitted that the requirement is unlawful and requires a long-term commitment to be made in respect of a property that no person can properly provide as it is uncertain as to what circumstances may arise that will not allow the retention of the institutional facility. Concerns are also raised regarding the requirement for applications to be made by the institutional owner/occupier.

It is noted in some submissions that the wording of the Z15 objectives poses difficulties to cases where the Z15 lands are no longer in the ownership of an institutional entity. It is submitted that such lands which have already been disposed of have no potential for institutional development and in this regard, it is not possible to comply with the requirements of the objective. It is also submitted that the Z15 zoning objective should not apply to lands where residential development has already been permitted. Some submissions call for the omission of the requirement for the retention of existing sports pitches in the redevelopment of Z15 lands. Others request that owners of Z15 lands should maintain community and sporting uses and, in some instances, restore previous uses.

Some submissions suggest that the Planning Authority should undertake a review of all Z15 zoned lands before proposing any significant changes to the Z15 land use zoning objective as

part of the Planning Authority's active land management functions, in consultation with the institutional landowner. It is stated that this commitment would help identify if there are surplus and underutilised Z15 lands which provide an opportunity to deliver high quality infill residential developments in the city, which in turn could be rezoned as Z12 or similar, helping to provide additional housing in suitable locations without compromising the institutional and community uses on such lands.

Some submissions seek that BTR developments be removed from Z15 zoning objective.

Chief Executive's Response

Rationale for Z15 Zoning Objective

The CE notes the concerns raised regarding the Z15 zoning objective. It is noted that a number of submissions state that there is insufficient and inadequate rationale for the zoning objective and in this regard, the CE considers it important to elaborate further on the purpose and intent of the proposed Z15 zoning objective.

As noted in the Draft Plan, it is considered that it is essential to provide adequate community and social infrastructure commensurate with the delivery of compact growth. Compact growth and the sustainable management of resources are key strategic objectives of the National Planning Framework (NPF) 2018.

The NPF identifies a minimum target population growth of 235,000-293,000 persons for Dublin City and over the period 2016-2040, which represents an overall population increase of 20-25%. The Framework supports the consolidation and densification of Dublin City by encouraging more intensive forms of residential and employment development (NPO 11) and by requiring 50% of the City's future housing and employment growth to be located within the existing 'built-up' area (NPO 3b). The NPF growth strategy provides for better use of underutilised serviced land and buildings, including infill and brownfield land, with more high-quality and higher-density mixed-use development accompanied by enhanced amenities, education, health and social services - all supported by sustainable mobility.

Whilst the need for additional housing and compact growth is clearly endorsed, national and regional policy also reinforces the need for 'healthy placemaking' and the delivery of well-designed, adaptable, infill and brownfield development close to existing services and facilities. The NPF requires the capacity of the City's infrastructure (including social and community infrastructure) to be assessed in accordance with NPO 72a, with this assessment being used to inform the approach to land use zoning taken in the Core Strategy. The Regional Spatial and Economic Strategy (RSES) 2019, builds on the objectives of the NPF by providing a more detailed Metropolitan Area Strategic Plan (MASP) which seeks the sustainable development of the Dublin Metropolitan Area. It is evident that the policy focus is not just on housing delivery, but on the creation of sustainable and viable communities and neighbourhoods. To achieve this, adequate social and community infrastructure must be delivered in tandem with housing.

The Core Strategy of the Draft Dublin City Development Plan 2022-2028 is aligned with both the NPF and the RSES, and makes provision for anticipated population growth between 21,350 – 31,450 additional persons over the 2022-2028 plan period, leading to an overall population target of between 625,750 and 640,000 by 2028.

In keeping with the NPF and RSES, Dublin City Council is committed to sustainable land management and resource efficiency. National and regional policy on urban consolidation

presents a significant opportunity to densify the city, to address population loss and to maintain the viability of existing social and community infrastructure. However, the City Council are also mindful that, as Dublin City densifies and consolidates further, sufficient social and community infrastructure will be required to meet anticipated population increases. Safeguarding against the unsustainable overburdening or loss of existing social and community infrastructure will become increasingly important.

The city's targeted population growth will lead to a citywide increase in demand for school provision as well as provision of other key community services such as primary care centres and other health facilities, as well as facilities such as libraries, community centres, facilities for the elderly and persons with disabilities, childcare facilities, parks, and other facilities and spaces for play and recreational activity.

With significant population growth planned for Dublin City over the plan period, the City Council must consider how best to sustainably plan for new and growing communities, in addition to making provision for a corresponding level of social and community infrastructure provision. It is the objective of the Council to ensure the best use of the city's land in order to deliver additional housing, to provide integrated transport; to develop community infrastructure and facilities; and to deliver long term, sustainable economic growth.

The city's Z15 "institutional" lands typically comprise medium to large sites, often consisting of long-established complexes of institutional/ community buildings and associated open grounds, but also comprise smaller sites usually in more central areas. The existing uses on these lands generally include institutional/civic/social/ community-related development (lands and buildings) such as schools, colleges, recreational facilities, sports grounds, residential institutions and healthcare institutions, such as hospitals. They include state, public and privately owned lands. It is considered that these lands will continue to play an essential role in providing adequate community and social infrastructure commensurate with the delivery of compact growth, together with a wider biodiversity and green infrastructure/ ecosystem services function.

In recent years, these Z15 lands have been subject to piecemeal erosion and fragmentation as they come under increased pressure for residential development. Z15 lands are considered a finite resource and it is important that they are preserved to provide for essential community and social infrastructure to serve the expanding population needs of the city.

In this regard, the Draft Plan is committed to the retention, protection and enhancement of the city's Z15 lands as they contribute to the creation of vibrant neighbourhoods and a sustainable well-connected city. Whilst there is a need for housing development in the city, there is also a need for adequate social and community infrastructure and in this context, it is considered entirely appropriate to enhance the zoning provisions for same. The CE considers that the objective of protecting and preserving certain lands for community and social infrastructure is not in conflict with the demand for increased housing, as lands are required to support residential development in terms of community and social uses in the city's neighbourhoods.

The strategic importance of the city's Z15 landbank to the future development of Dublin as a 15-minute city has been considered as part of the preparation of the Draft Plan. The Council have sought to strengthen the recognition and role of the city's Z15 landbank under the Draft Plan by protecting, improving and encouraging the ongoing use and development of lands zoned Z15 in the Draft Plan for community and social infrastructure. The Council specifically recognises that institutional lands are an important community resource and should be preserved and protected as a strategic asset for the city.

In preparing the Draft Plan, the Z15 zoning objective was examined and the appropriateness of residential and commercial use on Z15 lands was considered in the context of future housing demand and the need to plan for such growth in line with the NPF 2040. It was considered that, in order to ensure the retention of these lands for social and community use, there is merit in having a more focussed policy regarding these particular land uses, as they have significant potential to diminish the capacity of Z15 lands for their primary purpose.

The existing wording in the 2016 Plan was not considered robust to prevent the ongoing erosion and loss of these lands. It is noted that since the previous Plan, a number of Z15 sites have been comprehensively redeveloped for housing development. In this regard, it is proposed that subject to specified criteria, residential or commercial accommodation uses will be deemed acceptable on Z15 zoned lands only in highly exceptional circumstances. In this context, the Z15 lands do not form part of the Core Strategy housing figures and it is considered that there is sufficient zoned land within the city to cater for anticipated housing demand. The Z15 lands are not viewed as development opportunity lands.

It is considered appropriate that limited residential/commercial development will only be allowed in highly exceptional circumstances where it can be demonstrated that the proposed development is required in order to maintain or enhance the function/operational viability of the primary institution on the lands. The purpose of this proviso is to ensure that the development of residential/commercial accommodation is directly associated with the social and community use of the lands in order to manage the risk of further piecemeal erosion and/or fragmentation of the city's Z15 landbank.

In this context, the provisions of the Draft Plan that residential/commercial development should only be in exceptional circumstances and should be subordinate to the overall social and community use on the site, is considered entirely appropriate in order to safeguard these lands over the Plan period.

The CE considers that contrary to the assertions of many of the submissions, that it is entirely appropriate for a development plan to zone particular lands for social and community use. The Draft Development Plan Guidelines 2021 set out clear guidance regarding the purpose of land use zoning and states that the "zoning of land is the primary spatial expression of the strategy of the development plan and is a key element of the plan-making process. This includes zoning for particular types of development (e.g. residential or employment), but also for other important land uses such as recreation, open space and agriculture. Land-use zoning is, therefore, about identifying the quantity of land needed for particular use types, the best locations for such land-uses and the acceptability or otherwise of the various classes of land-use within any particular zoning".

Section 6.2.6 of the guidelines also notes:

"When undertaking zoning decisions, in addition to the provision of strategic and enabling water/drainage/transport and other infrastructure, consideration must also be given to the future availability of (or the capacity to provide) supporting local community and amenity services and infrastructure. This is applicable to employment-related, as well as for new residents and communities, including:

- community facilities;
- medical and health-care facilities;
- schools and childcare;
- public parks and major open spaces;

- recreation and sports facilities;
- public transport.”

In this context, it is considered that it is entirely appropriate and in accordance with best practice, to ensure that lands are zoned in the Plan for social and community infrastructure.

This position has also been confirmed in case law. In *Christian v Dublin City Council*, Clarke J recognised that retaining lands for institutional and community use is a valid and legitimate objective for the planning authority to adopt. He stated:

“It seems to me to follow that the overall policy inherent in Z15 is justified. It is permissible to seek to retain a sufficient amount of land necessary to provide for the kind of institutional and community services which ought to be provided close to where people live.”

It is considered that there is a clear and robust rationale for the proposed Z15 zoning. It is entirely appropriate in the context of national policy which promotes urban consolidation in tandem with healthy placemaking and the need for appropriate social and community infrastructure. It is not considered that the zoning is overly restrictive and it does provide opportunities for limited residential development in appropriate circumstances.

The CE also notes Section 10(8) of the Planning and Development Act 2000 as amended which states that:

“(8) There shall be no presumption in law that any land zoned in a particular development plan (including a development plan that has been varied) shall remain so zoned in any subsequent development plan.”

In this regard, if it is within the competence of the planning authority to change the zoning of lands in a development plan, it must also follow that it is within the competence of a planning authority to change the terms of the zoning applicable to particular lands. The proposed amendments to Z15 are considered in accordance with the provisions of the Act.

The comments in submissions regarding constitutional rights are noted. However, the CE is of the view that while the right to private property is recognised, it must be balanced with the needs to ensure the proper planning and sustainable development of the city. It is noted that Clarke J in *Christian* recognised that all property owners are subject to the Planning Code, stating at pg. 559:

“The applicants, like any other property owner, have no absolute property rights. It follows that the development plan as such, which contains restrictions on the way in which property is likely to be permitted to be developed, may, at least in principle, affect the value of property owned by the applicants.”

Furthermore, as noted in the Clonres CLG and An Bord Pleanála judgement:

“All property must be held with some view to the benefit of society as a whole and of future generations, and is not to be dealt with as one sees fit. To argue that society’s endeavours to ensure that outcome (through development plans, for example) have to be read narrowly and restrictively, while the individual property owner can take the full advantage of societal provision both direct and indirect, is to entirely distort the social contract. Insofar as law in general and development plans in particular are part of the People’s benefit under that contract, they are terms for the welfare of all, not penal clauses to be read *contra proferentem*.”

In addition, the CE highlights that the Draft Plan also includes the Z12 zoning objective which provides a zoning policy framework for the sustainable redevelopment of former institutional lands that are not required for institutional or community/social infrastructure purposes. This zoning policy provides the appropriate response to lands that are clearly not needed; with a number of such lands zoned Z12 within the current Draft Plan primarily for residential purposes.

In conclusion, the CE considers that the Z15 zoning objective is entirely reasonable and proportionate and based on sound planning rationale supported by national and regional policy.

Social Housing

Some submissions state that the zoning objective would impede the delivery of social housing. The Core Strategy and the Housing Strategy of the Draft Plan clearly set out that the social housing needs of the city for the life of the Plan, can be accommodated on other appropriately zoned lands.

The CE notes that the zoning objective does provide for residential institution use and that the criteria set out under the objective do not apply to this land use. It is recommended that additional clarification is provided to clarify that the criteria also do not apply to assisted living/retirement home. It is considered that these uses are appropriate on Z15 zoned lands as they have a broader social function and are consistent with the overall intent of the Z15 objective.

School Sites

The CE notes the comments that the Plan should support schools with a Z15 zoning objective to rationalise them over the Plan period and that a more flexible approach to the provision of housing on such lands should be adopted.

As part of the Plan review, an assessment of future school demand was undertaken. As schools are the most widespread Z15 use, and involve for the most part the largest portions of Z15 land within each area of the city, their future needs are critical to an understanding of the future needs for Z15 land overall. Based on population projections, it is anticipated that there will be a demand for approximately 12 new 24 class primary schools by 2040 and nine new secondary schools (30 classes) by 2040¹. It is envisaged that a significant portion of this demand will be met through expansion of the existing schools within the city.

The Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. Their submission states that:

“There is an existing network of schools across the various neighbourhoods of Dublin City Authority. These schools are of central importance to their local communities. Given the strategic long-term objective of compact development/consolidation/densification, given the objective of the 15-minute City and given that all lands within the Dublin City plan are serviced, the full protection of every one of these school properties (including buildings, play areas, pitches and green areas) is critical to optimally meet the future educational requirements of local areas across Dublin City. Any reduction/erosion whatsoever in the area of a school site could inhibit

¹ Average secondary school was calculated using an average of 28 pupils per class, with 5 classes per year over 6 years.

the optimal development of that site/school in order to optimally meet the future requirements of the local area arising from the general policy of more intensive development in the City.....City lands is very scarce and where it is available, it is generally exorbitantly expensive, commanding residential prices. As development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. Increasingly there is no other option.”

The submission goes on to request specific protection of the curtilage of school sites.

It is clear from the estimate of demand, and from the submission by the Department, that there will be a growing citywide need for additional school provision that Dublin City Council should plan for over the coming decades. Both the 2022 Draft Plan and future Development Plans need to ensure that adequate capacity exists both within existing schools and on future school sites to meet this growth. Due to the structure of the city and scarcity of unused land, it is likely that a large portion of the demand will have to be met within existing school sites; except for the small number of exceptional locations of significant large-scale redevelopment, where new sites can be designated.

In examining the delivery of housing during the 2016 Development Plan, it is clear that the pattern of provision of new housing is not isolated to the very large new development areas like Belmayne; but is distributed across the City as various infill sites of both smaller and larger scale². For this reason, the response to accommodating school demand needs to take a citywide approach; recognising that growth in population and school demand will in all likelihood happen across all areas of the city. In this context, the CE does not recommend that the plan include greater flexibility for Z15 school sites and that it is appropriate that these are retained for future educational use and social and community infrastructure. The CE also recommends that a more explicit provision is provided in the Draft Plan to clarify that stakeholder engagement should be conducted when proposing development on any Z15 site.

The comments that the zoning objective does not cater for the needs of multi school trustees is noted and the CE recommends that an amendment is made to clarify that a residential/commercial development may also be considered where it is required to maintain or enhance the function / operational viability of social and community infrastructure under the control of the applicant within the administrative area of the Dublin City Council.

The submissions by a number of charitable trusts are noted. The CE is of the view that the Z15 zoning objective does not preclude lands being used for charitable purposes, however, a textual amendment is recommended to clarify this.

Masterplan

The CE notes the comments regarding the preparation of a masterplan and recommends that greater clarity would be provided if this was amended to require an applicant to prepare a social and community audit in support of a variation. Such an audit would be required to clearly demonstrate that the lands are not suitable or viable for ongoing use for social and community use. A textual amendment is recommended in this regard.

² See Dublin Housing Task Force reports and maps, various years
<https://www.gov.ie/en/publication/5b918-housing-supply-coordination-task-force-for-dublin/?referrer=http://www.housing.gov.ie/housing/construction-2020-strategy/dublin-housing-supply-task-force/housing-supply-coordination-task>

In terms of preparing a masterplan, the CE considers that preparation of same is appropriate to ensure the comprehensive and sustainable development of such Z15 lands. However, to ensure consistency with the CE recommendations regarding policy SC17 (see response to OPR), it is recommended that the size threshold for a masterplan is increased to 1ha.

Variation

The CE notes the comments made in some submissions that the requirement to prepare a variation is onerous. As noted previously, it is considered that residential/commercial development should only be permissible on Z15 lands in highly exceptional circumstances. The Z15 land bank comprises just 7.84% of land zoned within the city area. It is a finite resource and, therefore, there must be a robust case made by the applicant where it is proposed that such lands are to be developed for a use other than social and community use. In this regard, it is considered that a variation is appropriate and justifiable in order to provide appropriate public consultation and stakeholder engagement.

The CE notes the submission regarding the material contravention procedure. It was not the intention of the CE that the reference to requiring a variation would exclude the power of the elected members to grant permission in material contravention of the development by following the material contravention procedures. A textual amendment is recommended to provide clarification that either a variation or material contravention could be pursued.

Cessation of Use

The CE notes the concerns in some submissions that the wording of the objective is seeking to place a use on the land notwithstanding the actual planning use may have ceased. It is asserted in some of the submissions that when a use ceases to exist, the planning use is considered to have been extinguished or abandoned.

The CE considers that this interpretation is inconsistent with recent case law specifically addressing the question of change of ownership and also established and existing use in respect of institutional lands. In *Redmond v An Bord Pleanála* [2020] IEHC 151, where lands under the development plan were subject to institutional lands designation, Simons J rejected an argument that institutional use would cease because there was a change in land ownership, stating at para. 56:

“With respect, such an interpretation would make an absurdity of the development plan. Development objectives are not intended to be personal or peculiar to individual landowners. Rather, planning permission enures for the benefit of the land. The developer’s argument ignores the fact that, as of the date of the adoption of the development plan, the lands had an established institutional use. This established use and designation is not lost by dint of a transfer of ownership. Rather, it remains until such time as planning permission is granted for an alternative use, such as, for example, residential use. The relevant development plan policies are precisely intended to regulate the circumstances in which such a change in use might be authorised. It is illogical to say that those policies did not bite on the planning application in the present case, an application which sought planning permission to do the very thing which the development objectives are designed to regulate, i.e. to change the authorised use from institutional use to residential use”.

The CE also highlights the recent High Court decision in relation to Clonres Clg and An Bord Pleanála [2021] IEHC 303, where Humphreys J considered the matter of ‘use’ in respect of Z15 zoned lands. The judgement noted a number of key points including:

- that a change in ownership does not in itself alter the interest to be protected by the zoning,
- that the purpose of a development plan is not just to protect an existing or previous community use, it includes future looking community uses,
- the word “use” in the development plan does not mean the *de facto* existing use on the ground. In this regard, the zoning of the site does not cease to apply just because an existing community, social or institutional use is no longer operational.

In this context, the purpose of the Z15 zoning objective is to ensure that a full and reasoned rationale is provided by an applicant in instances where an existing social and community use has ceased and a residential/commercial use is sought. It is the view of the CE that the zoning objective is forward looking and that the lands should continue to be used for a use that is consistent with the Z15 zoning objective of the land, unless there is a robust reason for not doing so. In this regard, it should be demonstrated by the applicant that the lands are not viable for any social and community infrastructure (not just the historic use). The CE recommends additional clarification that it is the objective of the Council that such Z15 lands should be retained for a use in accordance with the zoning objective i.e. social and community infrastructure unless exceptional circumstances prevail. The CE recommends that a clear definition of social and community infrastructure is included in the zoning objective and updated in the land use definitions – Appendix 15.

Legal Agreement and Ownership

The CE notes the concerns raised regarding the requirement for a legal agreement and a textual amendment is recommended to remedy this. The CE also recommends a clarification to the text that an application can be made with the consent of the owner.

The CE notes the difficulties that could be posed in instances where Z15 land has already been disposed of by an institutional owner. It is recommended that the text is clarified to distinguish those lands disposed of prior to the adoption of the plan.

The CE also notes that a number of submissions raised objections that the proposed Z15 zoning objective may conflict with a site where permission has already been granted. The CE is of the view that the proposed amendment to the Z15 zoning objective would not preclude the implementation of a development where permission has already been granted. In instances where land has already been disposed and permission not yet received, it is the view of the CE that the provisions of the zoning objective will apply to such lands once the plan is adopted. It remains open to the applicant to seek a variation/material contravention to the plan if appropriate.

Playing Pitches

It is noted that many of the Z15 lands accommodate playing pitches that are often a valuable local community facility and amenity and also in some instances have an important biodiversity role. The CE is of the view that having regard to the important recreational function of such lands and in some instances their biodiversity value, it is entirely reasonable for the Development Plan to ensure where there is an existing sports pitch or sports facility on the Z15 lands subject to redevelopment, commensurate sporting/recreational infrastructure will be required to be provided and retained for community use where appropriate as part of any new development.

Z15 Study

The CE notes that some submissions seek an objective regarding a specific Z15 study. As part of the consideration of the zoning objectives in the current plan, the Council undertook a study of all Z15 zoned lands in the city in 2020. This examination looked at the current use of the lands, existing permissions and changes of use, flood risk and environmental risk. The purpose of this examination was to ensure that appropriate zoning provision would be made for each land parcel and for social and community infrastructure across the City as part of the preparation of the Draft Dublin City Development Plan 2022-2028.

The City's Z15 sites were reviewed in order to establish which lands should retain their Z15 zoning and which should be proposed for a change in zoning to better reflect their current use, their planning and development status or, their suitability for planned sustainable residential development in the future. In addition, the review considered sites that should be rezoned Z15 from other zoning categories in order to protect existing in-situ community and social infrastructure uses. The examination allowed the City Council to identify where social and community infrastructure facilities and their associated amenities are located in the city and to allow for the protection and improvement of the existing social and community infrastructure function of the lands.

This review resulted in many of the city's schools and other institutions (such as prisons, youth centres and primary care centres) being rezoned to Z15 from other uses to ensure that the lands remain available for their intended purpose as the population of the city increases and to ensure these services are retained within sustainable distances, supporting the 15-minute city principle. Some sites were recommended to be zoned Z12 or Z1 to reflect their potential for development. In this regard, it is not considered necessary by the CE to carry out a further Z15 study or to include an objective regarding same.

Other Matters

The CE notes that the draft text refers to office development and recommends a textual amendment to refer to commercial development to provide greater clarity.

It is also recommended that further clarity is provided regarding the uses permissible and open for consideration under the Z15 zoning objective is provided to emphasise that these lands are intended primarily for social and community purposes.

The CE notes that uses that are considered open for consideration under the zoning objective are limited and the Draft Plan explicitly states that where such a use is proposed, it must be demonstrated that the proposal is in accordance with and assists in securing the aims of the zoning objective and that such a development would preserve, maintain or enhance the existing social and community function(s) of the lands subject to the development proposal.

The submissions raising concerns regarding the wording - "a one off development" are noted and in this context, the CE recommends that this restriction is omitted to provide greater flexibility where it can be demonstrated that such development is required to strengthen and enhance existing uses on site and to allow for exceptional circumstances. It is also recommended by the CE that the wording 'long term' be omitted as it is recognised that not all institutions may be required in the long term.

The CE can confirm that BTR developments are neither Permissible nor Open for Consideration under the Z15 zoning objective. Policy QHSN38 sets out the locational criteria for such sites and

Z15 lands are not considered appropriate for such use. No change is recommended in this regard.

Conclusion

In conclusion, the Draft Dublin City Development Plan 2022-2028 seeks to ensure that land is appropriately zoned in order to accommodate the expected growth needs of Dublin City within the lifetime of the plan in accordance with the Core Strategy, whilst optimising the use of existing social infrastructure and community facilities. The Z15 zoning objective has been amended from that in the 2016 Plan to safeguard and strengthen the role of the city's Z15 landbank and to protect and facilitate the ongoing use and development of these lands for community and social infrastructure as part of a more sustainable and compact city. It is entirely appropriate for a Development Plan to identify lands suitable for community and social infrastructure as set out in the Draft Development Plan Guidelines and to restrict uses that would potentially conflict with the overall intent and purpose of the zoning objective. The zoning objective is proportionate and will ensure the proper planning and sustainable development of the city and the creation of long-term viable communities and neighbourhoods supported by adequate social and community infrastructure.

Chief Executives Recommendation

Chapter 14: Land Use Zoning

Section: 14.7.14 Community and Social Infrastructure

Page: 628

Amendment:

Land-Use Zoning Objective Z15: To protect and provide for community uses and social infrastructure.

Z15 lands (**typically**) comprise **{a variety of} (large)** sites, often consisting of long-established complexes of institutional/community buildings and associated open grounds. ~~(-but also comprise smaller sites usually in more central areas-)~~ The existing uses on these lands generally include community, **{social or institutional} (related)** development such as schools, colleges, sports grounds, residential institutions and healthcare institutions, such as hospitals.

Such facilities are considered essential in order to provide adequate community and social infrastructure commensurate with the delivery of compact growth **{and the principle of the 15-minute city}**. It is the policy of the council to promote the retention, protection and enhancement of the city's Z15 lands as they contribute to the creation of vibrant neighbourhoods, **{healthy placemaking}** and a sustainable well-connected city.

The city's Z15 landbank also accommodates many nationally important institutions such as the RDS and St. James' Hospital, and the Council are committed to safeguarding their continued operation, consolidation and enhancement.

In recent years, Z15 lands have come under increased pressure for residential development. However, protecting and facilitating the ongoing use of these lands for community and social infrastructure, **{as well as their use in some instances for charitable purposes,}** is a key objective of the Council. The Council are committed to strengthening the role of Z15 lands and will actively discourage the piecemeal erosion and fragmentation of such lands.

{The following paragraphs sets out the criteria for:

- A) Development on Z15 lands
- B) Development following cessation of Z15 use}

{A: Development on Z15 Lands}

Limited residential/~~(office)~~ {commercial} development on Z15 lands will only be allowed in highly exceptional circumstances where it can be demonstrated by the ~~(institutional)~~ landowner/{applicant} that the proposed development is required in order to maintain or enhance the function / operational viability of the primary institution {al}/social/community use on the lands {and/or other institutional social/community use within the Dublin City Council area in the control of the landowner/applicant} ((see paragraph 14.3.1 above)).

The following criteria must also be adhered to:

- {In proposals for any residential/commercial development, the applicant must demonstrate that the future anticipated needs of the existing use, including extensions or additional facilities would not be compromised.}
- Any such residential/~~(office)~~ {commercial} development must demonstrate that it is {subordinate} ~~(ancillary)~~ in scale to the primary {institutional}/social/community use.
- {Where appropriate, proposals should be subject to consultation with the relevant stakeholder e.g. Department of Education/Health Service Executive.}
- The development must not compromise the open character of the site and should have due regard to features of note including mature trees, boundary walls and any other feature/s as considered necessary by the council.
- ~~(Only a once-off development in respect of the site / lands in the ownership of and /or use by the institution will be considered).~~
- In all cases, the applicant shall submit a statement, {typically in the form of a business plan,} ~~(as part of a legal agreement under the Planning Acts,)~~ demonstrating how the existing institutional {/social/community} facility will be retained {and enhanced} ~~(long term)~~ on {the} site {/lands}.
- In all cases {(with the exception of land disposed of prior to the adoption of the plan),} the applicant shall be the ~~(institutional)~~ {land} owner ~~(/occupier)~~ {or have a letter of consent from the landowner}.
- ~~(In cases of rationalisation of an existing use in order to facilitate such a residential/office development, the applicant must demonstrate that the future anticipated needs of the existing use, including extensions or additional facilities would not be compromised.)~~

For clarity, the above criteria do not apply to residential institution use {, including ancillary staff accommodation or assisted living/retirement home.} ~~((e.g. supported living units).)~~ {Student accommodation will only be considered in instances} where it is related to the primary use on the Z15 lands.

{Any proposed development for 'open for consideration' uses on part of the Z15 landholding, shall be required to demonstrate to the planning authority how the proposal is in accordance with and assists in securing the aims of the zoning objective;} ~~(how it provides for significant new community and social infrastructure that will be of benefit to the wider community;}~~ {and, how such a development would preserve, maintain or enhance the existing social and community function(s) of the lands subject to the development proposal.}

{B: Development Following Cessation of Z15 Use}

~~(In instances where all or part of a Z15 landholding, is sold or otherwise disposed of for development (e.g. where there has been a cessation of the existing use or the lands or part thereof are sold effectively severing them from the existing primary institutional landholding), the use of the lands will continue on the basis that the existing community and social infrastructure function of the lands remains.)~~ The cessation of an existing {Z15 institutional}/social/community use on a site or change in land ownership does not extinguish / negate the ~~(function of such lands for)~~ {purpose of these lands for} community and social infrastructure ~~{use. It is the objective of the Council that such lands should be retained for a use in accordance with the zoning objective unless exceptional circumstances prevail.}~~

In {such} ~~(these)~~ circumstances, (i.e. cessation of use on a Z15 site or disposal of all or part of a Z15 site), a variation or {material contravention} to the Development Plan will be required to develop such lands for ~~(other uses including)~~ residential/~~(office)~~{commercial} purposes. Any such variation/{material contravention} would need to be supported by a detailed {community and social infrastructure audit} ~~(masterplan)~~ which should clearly demonstrate why the land is not viable / suitable for social and community use {(defined as the physical infrastructure necessary for successful communities, i.e. community infrastructure such as schools, libraries, community centres, cultural spaces, health centres, facilities for the elderly and persons with disabilities, childcare facilities, parks, and other facilities and spaces for play and recreational activity) in accordance with the zoning objective.}

{Masterplan Requirement}

In either scenario A or B, it is a requirement that for sites larger than 1ha that a masterplan is provided.} ~~(The Masterplan should also set out a clear vision for the {Z15} lands and provide for)~~ {The masterplan must set out the vision for the lands and demonstrate that} a minimum of 25% of the overall development ~~{site/}~~lands is retained for open space and/or community and social facilities. This requirement need not apply if the footprint of existing buildings to be retained on the site exceeds 50% of the total site area. ~~(The masterplan must incorporate landscape features that contribute to the open character of the lands and ensure that public use including the provision of sporting and recreational facilities which would be available predominantly for the community are facilitated.)~~ The 25% public open space shall not be split up, unless site characteristics dictate otherwise, and shall comprise mainly of soft landscaping suitable for recreational and amenity purposes and should contribute to, and create linkages with, the strategic green network. {Development proposals must incorporate landscape features that contribute to the open character of the lands and ensure that public use, including the provision of sporting and recreational facilities which would be available predominantly for the community, are facilitated.}

Where there is an existing sports pitch or sports facility on the Z15 lands subject to redevelopment, commensurate sporting/recreational infrastructure will be required to be

provided and retained for community use where appropriate as part of any new development (see also Chapter 10: Green Infrastructure and Recreation, Policy GI49).

~~(Any proposed development for 'open for consideration' uses on part of the Z15 landholding, shall be required to demonstrate to the planning authority how the proposal is in accordance with and assists in securing the aims of the zoning objective; (how it provides for significant new community and social infrastructure that will be of benefit to the wider community); and, how such a development would preserve, maintain or enhance the existing social and community function(s) of the lands subject to the development proposal.)~~

Z15 – Permissible Uses

{Assisted living/retirement home,} Buildings for the health, safety and welfare of the public, café/ tearoom {{(associated with the primary use)}}, cemetery, childcare facility, club house and associated sports facilities, community facility, cultural/recreational building and uses, education, medical and related consultants, open space, place of public worship, {primary health care centre}, public service installation, residential institution (and ancillary residential accommodation for staff), sports facility {and recreational uses}.

Z15 – Open for Consideration Uses

Allotments, ~~(assisted living/retirement home), (bed and breakfast)~~, car park ancillary to main use, civic and amenity/recycling centre, conference centre {{(associated with the primary use)}}, crematorium, craft centre/ craft shop {{(associated with the primary use)}}, ~~(delicatessen, funeral home, guesthouse, hostel (tourist))~~, municipal golf course, ~~(primary health care centre), (restaurant, shop (local))~~, student accommodation (associated with the primary institutional use), training centre {{(associated with the primary use)}}, veterinary surgery. ~~((see (paragraph 14.3.1 and) above paragraphs in relation to residential/office proposals).)~~

Glossary

Page: 804

Amendment:

Deletion of following text:

~~(Social Infrastructure: Social infrastructure includes all community infrastructure. The physical infrastructure necessary for successful communities, i.e. community infrastructure such as schools, libraries, community centres, cultural spaces, health centres, facilities for the elderly and persons with disabilities, childcare facilities, parks, and other facilities and spaces for play and recreational activity.)~~

Volume 2, Appendix 15

Land Use Definitions

Page: 395

Amendment:

Add following text:

{Social and Community Infrastructure: is the physical infrastructure necessary for successful communities, i.e. community infrastructure such as schools, libraries,

community centres, cultural spaces, health centres, facilities for the elderly and persons with disabilities, childcare facilities, parks, and other facilities and spaces for play and recreational activity.

Section 14.7.15 Affordable Housing and Employment – Zone Z16

Summary

A number of submissions were made in respect to the new Z16 land use zoning.

The submission made by the OPR raises serious concerns in respect of the proposed Z16 zoning objective and advises that it is inconsistent with the Planning and Development Act 2000 as amended.

One submission calls for the omission of the zoning from the plan while another deems Z16 to be contrary to proper planning and development on the basis that it is not integrated into the core strategy of the Draft Plan.

There is also support for the new land use zoning in some submissions with one calling for the rezoning of lands to Z16 with landowner agreement while another calls for the new zoning to be used in conjunction with masterplanning to ensure a fairer distribution of affordability across the city and the prioritisation of liveable homes.

Submissions also focus on what city lands could be developed for social and affordable housing in line with the land use zoning objective. One submission calls on the Council to prepare a strategy to rezone to Z16 and develop large sites belonging to public transport operators for social affordable housing. Other submissions seek that the Council work with the HSE and/ or LDA to develop part of the old Fever Hospital grounds at the Bru Chaoimhin complex in Cork Street for the same purposes.

Chief Executive's Response

The comments raised by the OPR with regard to the Z16 Zoning objective are addressed fully in the CE response to the OPR submission. The CE also notes the concerns raised by others in respect to the Z16 zoning and those submissions made in support of it.

In accordance with the Planning and Development Act 2000 (as amended), the purpose of land use zoning is a spatial exercise to set out the appropriateness of a land parcel for a particular land use. The Development Plan cannot circumvent national legislation in this regard, to require a higher level of provision of social and affordable housing on privately owned land. With regard to social and affordable housing, the legislative provisions regarding provision of same are set out under Part V of the Planning and Development Act 2000, as amended.

It is not the purpose of land use zoning to set out prescribed housing tenure mix/ownership or to define what constitutes affordable accommodation on any given site in the city. It is also considered that Z16 zoning is inappropriate as it may undermine the broader objectives of the Draft Plan to promote integrated communities with a broad range of tenures and housing mix.

Chief Executive's Recommendation

See recommendation of the CE in response to OPR submission.

Other Issues

Summary

A number of submissions made in respect to Chapter 14 related to 'other' issues.

One submission called for the introduction of a 'retirement village' zoning and land-use definition.

A submission draws the Council's attention to the recent Government publication of draft legislation on land value sharing and the designation of urban development zones. The submission implores the Council to full take advantage of its forthcoming legislative powers but first to hold off on any rezonings until this new legislation comes into force.

One submission calls for brownfield sites along the Grand Canal on Davitt Road to be rezoned to include community facilities and retail and expresses hope that the Council will agree to a land swap between the Waste Management Depot and St. John Bosco Youth Centre as this would create a new Civic / Sports Centre for the Drimnagh area.

Chief Executive's Response

Retirement villages come under the definition of 'Assisted Living/ Retirement Home' which are already permissible or open for consideration under a number of zoning categories in the Draft Plan. In addition, Section 5.5.5 of the Draft Plan supports the provision of specific accommodation for older people who wish to remain within their communities. Policies QHSN22 and QHSN23 support the concept of independent living and assisted living for older people, to support and promote the provision of specific purpose-built accommodation, including retirement villages and encourage intergenerational models of housing for older people, building on pilot projects in the city. On this basis, the CE recommends that the introduction of a 'retirement village' zoning/ land-use definition is unwarranted. The CE notes that a large expanse of brownfield land along the Grand Canal at Davitt Road, Crumlin was rezoned from Z6 (Employment/Enterprise) to Z10 (Mixed-Use) under Variation No. 21 to the current 2016-202 Dublin City Development Plan. The Draft Plan reflects this Z10 zoning and allows for retail and community uses on the lands. The disposal of Council-owned land is a separate process which falls outside the scope of the Development Plan.

The CE notes the submission made in respect to the recent publication by the Government of draft legislation on land value sharing and the designation of urban development zones and the Council looks forward to the forthcoming publication of the final legislation. In the interim, in accordance with Section 10(2)(a) of the Planning and Development Act (as amended), a Development Plan is required to include objectives for the zoning land and to ensure sufficient land is zoned in accordance with the core strategy.

Chief Executive's Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Chapter 15: Development Standards

Chapter 15: Development Standards

Submission Number(s):

0272, 0350, 0455, 0465, 0553, 0609, 0673, 0678, 0743, 0804, 0853, 0887, 0890, 0912, 0963, 0964, 1003, 1017, 1025, 1037, 1040, 1042, 1045, 1053, 1056, 1075, 1120, 1161, 1190, 1264, 1298, 1307, 1335, 1359, 1363, 1386, 1406, 1420, 1438, 1448, 1472, 1480, 1487, 1493, 1501, 1509, 1536, 1540, 1553, 1571, 1579, 1612, 1629, 1633, 1647, 1670, 1673, 1674, 1680, 1681, 1682, 1694, 1697, 1698, 1704, 1708, 1717, 1721, 1729, 1733, 1734, 1736, 1740, 1754, 1755, 1762, 1770, 1771, 1772, 1773, 1775, 1776, 1783, 1784, 1808, 1816, 1818, 1826, 1827, 1838, 1848, 1849, 1855, 1874, 1875, 1959, 1971, 1972, 1973, 2070, 2085, 2103, 2111, 2121, 2129, 2139

15.2 Planning Process and Documentation

Summary

Submissions state that the Development Plan should include provision for planning information consultation meetings for Councillors and the public in order to discuss significant planning applications and receive advice on making observations in the context of the Development Plan and other legislation.

Chief Executive's Response

Planning Information Meetings are already carried out on a non-statutory basis as agreed with the Protocol Committee. Large-scale planning applications can be addressed at Area Committee in the context of the Large Scale Residential Act that replaces previous Strategic Housing Development (SHD) arrangements, with decision making for Large-scale Residential Development (LRD) applications returning to Dublin City Council in the first instance, with the subsequent right of appeal to An Bord Pleanála.

Chief Executive's Recommendation

No change to Draft Plan.

15.8.4 Childcare

A number of submissions were received that raise issues that relate to childcare facilities. For clarity, the issues raised are summarised and responded to under Chapter 5, Quality Housing and Sustainable Neighbourhoods.

15.8.6 Public Open Space

A submission on behalf of the Dublin G.A.A. County Board states that the public open space requirement for residential developments at 10% will create issues in relation to the under provision of public open space. As an alternative, it is stated that a standard for the provision of open space on a per capita basis, based on specified occupancy rates related to the number of bedrooms proposed in the individual residential units comprising a development, would be a more balanced method of determining open space requirements.

It is submitted that financial contributions in lieu of open space should be specifically ring fenced to facilitate the provision of a new park or the upgrading of the existing park facilities in the locality.

It is requested that Dublin City Council require future development proposals in the vicinity of active recreational space to implement protective measures to protect the operation of the amenity.

Chief Executive's Response

The points raised regarding open space provision are noted but do not represent a feasible alternative to current standards given the lack of available and reliable data. The Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas acknowledge the difficulty regarding data availability and use percentage standards for open space requirements.

The issues raised regarding financial contributions in lieu of open space are noted. While this is an operational matter generally, this is addressed in the Draft Plan at Section 15.8.7 (page 686) where financial contributions may be proposed towards the provision and enhancement of open space and landscape in the locality, as set out in the City Council Parks Programme.

Matters raised with regard to potential development proposals in the vicinity of open space area noted. The installation of any necessary protective measures is addressed on a case by case basis as part of any submitted planning application.

Chief Executive's Recommendation

No change recommended as the Draft Plan satisfactorily responds to the issues raised.

15.9.1 Unit Mix

Summary

A number of submissions were received that raise issues that relate to proposed specific housing mix standards in the North Inner City and the Liberties area. For clarity, the issues raised are summarised and responded to under Appendix 1, Housing Strategy.

A submission from the Land Development Agency seeks that flexibility apply in relation to mix requirements for affordable housing led schemes on relevant public lands.

Chief Executive's Response

The CE notes the issue raised by the Land Development Agency regarding mix flexibility. This matter is addressed under existing Draft Plan text at Chapter 15, Page 692 whereby different mix requirements may be considered having regard to the specific needs of the Housing and Community Services Department and to Objective QHSNO1 (page 166) where Dublin City Council will be the lead developer on City Council owned land, unless there are exceptional circumstances and will work with other agencies including the LDA.

Chief Executive's Recommendation

No change recommended as the Draft Plan satisfactorily responds to the issue raised.

15.9.2 Unit Size / Layout

Summary

Submissions seek to amend Universal Design Standards so that Universal Design targets are higher, e.g. 50% of units that are required to be in excess of minimum sizes be designed in accordance with universal design standards, 25% designed to UD + and 25% to UD++.

A submission by the Land Development Agency on unit typology seeks a derogation of standards to include a 2-bedroom, 3 person layout typology within affordable housing schemes.

Chief Executive's Response

Submissions raised with respect to Universal Design targets are noted. This issue has been assessed under Chapter 5, Quality Housing and Sustainable Neighbourhoods and consequential amendments are proposed under Chapter 5, and Appendix 1, Housing Strategy. Related proposed amendments to Chapter 15, Development Standards at 15.9.2 Unit Size / Layout, are shown below for consistency.

In response to the issue raised with respect to the layout requirements of future affordable housing, it is noted that Section 15.9.2 (Page 693) provides that the introduction of a 2 bedroom, 3 person unit may be considered within a scheme, but only to satisfy a specialist housing need for Part V social housing requirements or to facilitate appropriate accommodation for older people and care assistance, as required under SPPR3 of the Design Standards for New Apartments 2020 (DHLGH) – and as such cannot be amended through the Development Plan. No change is recommended on the basis of the issue raised.

Chief Executive's Recommendation

Amendment

Chapter 15

15.9.2 Unit Size / Layout

Page 693. Fourth paragraph.

The majority of all apartments in any proposed scheme of 10 or more apartments (excluding Build to Rent accommodation) shall exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom unit types, by a minimum of 10% (any studio apartments must be included in the total, but are not included as units that exceed the minimum by at least 10%). ~~(The layout of the larger units of each type should be designed in accordance with the guidance set out in Universal Design Guidelines for Homes in Ireland 2015.)~~

{In accordance with the Housing Options for an Ageing Population Policy Statement 2019, 50% of the apartments in any development that are required to be in excess of the minimum sizes should be designed in accordance with the guidance set out in Universal Design Guidelines for Homes in Ireland 2015 to ensure that they are suitable for older people, mobility impaired people and people with disabilities.}

15.9.3 Dual Aspect

Summary

Submissions received oppose the draft Plan approach to encourage all developments to meet or exceed a 50% dual aspect within the development unless specific site characteristics dictate that a lower percentage may be appropriate. In preference, it is requested that a minimum 33% requirement apply as per Specific Planning Policy Requirement 4.

Chief Executive's Response

The CE does not consider it appropriate to incorrectly interpret the lower minimum standards in 'Sustainable Urban Housing: Design Standards for New Apartments' as targets to be met in future development proposals.

Section 3.8 of the Guidelines referenced above seeks to safeguard higher standards and states that "In the interests of sustainable and good quality urban development these guidelines should be applied in a way that ensures delivery of apartments not built down to a minimum standard".

Dual aspect units significantly enhance the residential amenity obtained in a unit. In the interests of ensuring that high quality, attractive and long-term liveable apartment units are provided, the CE recommends that no change is made to the draft Plan proposal that Dublin City Council will encourage all developments to meet or exceed a 50% dual aspect within a development, unless where specific site characteristics dictate that a lower percentage may be appropriate.

Chief Executive's Recommendation

No change recommended.

15.9.9 Roof Terraces

Summary

Submissions raise issues that the Draft Plan limits the circumstances in which roof terraces may be permitted for use as a primary form of communal amenity space. It is stated that this may pose challenges, particularly on constrained infill sites in central urban locations, limiting the delivery of residential accommodation, particularly in the city centre.

Chief Executive's Response

The Draft Plan provides for the regulation of roof terraces at Section 15.9.9 (page 699) in order to ensure the provision of appropriate ground floor level residential amenity. This standard is considered necessary and reasonable in the context of apartment living, promoting street level activity, and for providing a quality level of residential accommodation for residents.

The Plan does recognise the ability of roof terrace space to contribute to a combination of courtyard and/or linear green space, but this does not circumvent the need to provide adequate accessible ground floor residential amenity, unless exceptional site specific conditions prevail.

Chief Executive's Recommendation

No change recommended as the Draft Plan satisfactorily responds to the issue raised.

15.10 Build to Rent Residential Developments (BTR)

Summary

A number of submissions were received that raise issues that relate to BTR developments. For clarity, the general policy issues raised are summarised and addressed under Chapter 5, Quality Housing and Sustainable Neighbourhoods, and in the response to the submission from the OPR.

In relation to specific design issues, a number of the submissions received state that a 3 sq. m. amenity space requirement for BTR developments is considered excessive, not in line with previous precedents and would be in excess of that required by national guidelines. It is stated that amenity space requirements should be on a case by case basis and based on the quality of amenity provided and not the quantum.

Chief Executive's Response

The Draft Plan provides guidance on BTR residential support facilities, services and amenities at Section 15.10.1 Design Standards (Page 707). The Draft Plan provides a general guideline of 3 sq. m. per person and further clarifies that this standard will be assessed on a case by case basis where the applicant can demonstrate a high standard of services and facilities.

The Sustainable Urban Development, Design Standards for New Apartments do not provide for a quantitative standard for such amenity stating at section 5.11 that the nature and extent of the resident services and amenities may be agreed by the project developer and the planning authority having regard to the scale, intended location and market for the proposed development. The Development Plan is, therefore, in line with national guidelines on this issue and no change is proposed to the draft text.

Chief Executive's Recommendation

No change recommended as the Draft Plan satisfactorily responds to the issue raised.

15.13.4 Backland Housing

Summary

A submission proposes an increase in ancillary accommodation on existing residential sites such as granny flats, etc. in order to improve accommodation standards for those living in overcrowded conditions and to help to alleviate the housing crisis.

Chief Executive's Response

The Draft Plan provides for the regulation of backland housing under Section 15.13.4 Backland Housing (Page 715) and infill/side garden development at 15.13.3 (Page 714). Dublin City Council will allow for the provision of comprehensive backland development where the opportunity exists. There is a separate detailed section on Ancillary Family Accommodation at Appendix 18 - Section 7, which has been revised to help family accommodation in the housing crisis.

Chief Executive's Recommendation

No change recommended as the Draft Plan satisfactorily responds to the issue raised.

15.13.5 Mews

Summary

A submission requests amendments to the proposed mews standards to reference instances where partial historic mews survive, including brick and stone walls, boundary walls, gate piers and ground surfaces. It is stated that development proposals should preserve and incorporate these elements using creative design.

Greater clarity is stated to be needed regarding proposals to allow an additional setback storey to mews developments.

Chief Executive's Response

The CE note the points raised in respect to the remaining partial historic mews and features, however, many of the buildings remain within the curtilage of protected structures and are, therefore, also afforded statutory protection. In this context, additional development standards are not considered appropriate.

Section 15.13.5.2 (Page 719) details standards with respect to mews regarding height, scale and massing. Proposals for an additional set back level may be considered on a case by case basis, in line with national policy to promote increased residential densities in proximity to the city centre. Specific guidance on individual development proposals is provided through the development management process and the addition of further design guidance to Section 15.13.5.2 is not appropriate having regard to the individualised nature and unique characteristics of each mews development, balanced with the need to promote more homes in the city.

Chief Executive's Recommendation

No change recommended as the Draft Plan satisfactorily responds to the issue raised.

15.13.9 Hostels / Sheltered Accommodation / Family Hubs

Summary

Submissions raise issues with respect to the distribution, overconcentration and regulation of homeless accommodation in the city.

Chief Executive's Response

This issue is addressed at Section 15.13.9 Hostels / Sheltered Accommodation / Family Hubs (Page 722) whereby it is recognised that an over-concentration of homeless accommodation, social support institutions or family hubs can potentially undermine the sustainability of a neighbourhood and so there must be an appropriate balance in the further provision of such developments in electoral wards which already accommodate a disproportionate quantum.

An application for such uses will, therefore, need to demonstrate through submission of mapping and other information that any such new or expanded development will not result in an undue

concentration of such uses, nor undermine the existing local economy, the resident community, residential amenity, or the regeneration of the area.

Chief Executive's Recommendation

No change recommended as the Draft Plan satisfactorily responds to the issue raised.

15.14.1 Hotels and Aparthotels

A number of submissions were received that raise issues that relate to hotels and aparthotels. For clarity, the issues raised are summarised and responded to under Chapter 6, City Economy and Enterprise.

15.14.7.3 Fast Food/Takeaways

Summary

Submissions raise issues with respect to the regulation and approval of take-aways and fast food outlets in the city in the context of overconcentration and public health.

Chief Executive's Response

This issue is addressed at Section 15.14.7.3 Fast Food/Takeaways (Page 730) whereby, it is the objective of Dublin City Council to prevent an excessive concentration of take-aways to maintain an appropriate mix of uses and protect night-time amenities in a particular area and to promote a healthier and more active lifestyle. A number of safeguarding criteria are outlined in order to regulate the development of new outlets. In particular, any new outlets will not be permitted within 250m of a school site.

Chief Executive's Recommendation

No change recommended as the Draft Plan satisfactorily responds to the issues raised.

15.14.12 Night Clubs/Licenced Premises/Casinos/Private Member Clubs

Summary

A submission states that noise emanating from and at the boundaries of these establishments is an issue for local residents. Greater protection measures and standards are required to address these issues.

Chief Executive's Response

This issue is considered at Section 15.14.12 (Page 733) whereby for new proposed uses, such issues will need to be addressed at planning application stage. Noise insulation and reduction measures, especially relating to any mechanical ventilation or air-conditioning, will be required to be submitted with any such planning application. For existing uses, this is an operational matter with recourse to enforcement by the environmental health department and planning enforcement section.

Chief Executive's Recommendation

No change recommended as the Draft Plan satisfactorily responds to the issue raised.

15.14.14 Data Centres

A number of submissions were received that relate to data centres. For clarity, the issues raised are summarised and responded to in Chapter 6, City Economy and Enterprise.

15.16 Sustainable Movement and Transport

A number of submissions were received that relate to standards on Electric Vehicle (EV) charging stations, Cycle Parking and Car Parking Standards. For clarity, the issues raised are summarised and responded to in Appendix 5, Transport and Mobility: Technical Requirements.

15.17.4 Outdoor Seating and Street Furniture

Summary

A submission details that Section 15.17.4, on Outdoor Seating and Street Furniture, should also include a requirement that any street furniture licence must be on open display at the relevant premises, and that failure to observe its terms would be taken into account in deciding on applications for the renewal of such a licence.

Chief Executive's Response.

This is an operational matter related to the Section 254 licencing process and no change is recommended on that basis.

Chief Executive's Recommendation

No change recommended to the Draft Plan as this is an operational matter.

15.18.8 Solar Energy

Summary

Dublin Airport Authority states that large scale proposals within a 15 km radius of the airport for Solar PV arrays may need to be accompanied with a Glint and Glare Assessment. DAA also requests amendments to the wording of Section 15.18.8 to state that all large-scale proposals for solar panels shall be sent to DAA as well as to the Irish Aviation Authority as part of the statutory consultee process.

Chief Executive's Response.

The CE notes the comments of the DAA in relation to glint and glare assessment. The CE further notes that existing text under Section 15.18.8 addresses this issue. As a further safeguard, it is recommended that it is appropriate to include reference to DAA as a consultee.

Chief Executive's Recommendation

Amendment

Chapter 15

15.18.8 Solar Energy

Page 764, Fourth Paragraph

Large scale proposals for solar panels or any development in the vicinity of the airport will be required to submit a Glint and Glare Assessment. Domestic applications will be assessed on a case by case basis. All large scale proposals involving solar panels shall be sent to Irish Aviation Authority and Dublin Airport Authority as part of the statutory consultee process.

15.18.4 Basements

A number of submissions were received that relate to basements. For clarity, the issues raised are summarised and responded to under Appendix 9, Basement Development Guidance.

15.9.17 Separation Distances (Apartments)

Summary

Submissions received request increased setback distances to cater for the recent increase of high rise, high density development which is stated to have a significant impact on the visual privacy of adjacent existing housing and opposing blocks.

Chief Executive's Response

New developments traditionally require a minimum separation distance of 22m, however, a greater or lesser separation distance may be prescribed having regard to the layout, size or design of a development and depending on orientation and location in built-up areas.

Separation distance is determined with regard to the ability of a proposal to comply with other safeguarding standards set out in the plan in terms of residential quality and amenity, including Appendix 3, Achieving Sustainable Compact Growth - Policy for Density and Building Height in the City. Separation distances between buildings must, therefore, be assessed on a case by case basis as set out in Section 15.9.17 Separation Distances (Page 705). Also, the Plan contains a new comprehensive set of guidelines on sunlight and daylight (Appendix 16, pages 399-415) in order to provide up to date tools for assessing such potential impacts.

Chief Executive's Recommendation

No change recommended as the Draft Plan satisfactorily responds to the issue raised.

Other Issues Raised

Summary

Dublin Port Company request the inclusion of supplementary development standards and criteria to provide guidance to prospective applicants when preparing planning applications for assessment that relate to Dublin Port. Dublin Port Company suggests text similar to that

provided under Section '16.21 Dublin Port', of the current Development Plan be included in Chapter 15.

Chief Executive's Response

For the benefit of consistency regarding the Dublin City Development Plan 2016-2022 and in order to provide supplemental guidance regarding the preparation and assessment of future development proposals concerning the port area, it is proposed to add additional text in Chapter 15 as provided below.

Chief Executive's Recommendation

Chapter 15

Section: New section numbering 15.19 Add new text

Page: 767

Amendment:

{15.19 Dublin Port

In assessing proposals for the Dublin Port area, Dublin City Council will have regard to the following:

- **Recognition of the important role of Dublin Port in the economic life of the city and the region and the consequent need in economic and employment terms to facilitate port development.**
- **The periphery of the port area facing residential areas shall be designed to minimise the impact of its industrial character.**
- **The impact on nature conservation, recreation and amenity use, and other environmental considerations, including having regard to the designation of Dublin Bay as a UNESCO biosphere and other environmental designations such as Special Area of Conservation (SAC) and Special Protection Area (SPA).**
- **The protection of the amenities of residential and commercial uses in adjoining areas.**
- **Design criteria including appropriate landscaping, finishes, signage, boundary treatments and site layout where development adjoins residential and commercial uses.**

Chapter 16: Monitoring and Implementation

Chapter 16: Monitoring and Implementation

Submission Number(s):

0003, 0344, 1006, 1134, 1378, 1397, 1550, 1557, 1635, 1645, 1700, 1704, 1708, 1721, 1874, 1973, 2121

Section 16.2 Collaboration and Engagement

Summary

Submissions request that any collaboration and engagement is carried out in a participatory manner with communities and using co-creation principles. Engagement should make special outreach efforts to include disadvantaged or marginalised groups in participatory processes.

Recognition is sought that the skills, awareness and competencies of the city's residents and users will be acknowledged and utilised in plan implementation, in addition to the normal agencies.

There is a request that a dedicated DCC Community Engagement Facilitator be assigned to take full ownership of Strategic Development and Regeneration Area (SDRA) projects, promoting public participation in decision making.

Chief Executive's Response

The CE acknowledges the constructive submissions made with respect to Chapter 16, Monitoring and Implementation.

The CE recognises that in addition to other agencies and stakeholders in the city, nationally and regionally, that the skills, awareness and competencies of the city's residents and users are critical to building and maintaining the city's momentum to achieve the sustainable development of the city for the benefit of all.

The Draft Plan highlights that the successful implementation of a significant number of the objectives of the Plan will necessitate ongoing collaboration and engagement with citizens. The City Council, through collaboration with communities and networks, such as the Public Participation Network, the Dublin City Local Community Development Committee, Comhairle na nóg and others, will develop on-going engagement processes for the implementation of the Development Plan over its lifetime as set out in Section 16.2 Collaboration and Engagement.

With respect to SDRA development and community engagement, this engagement will be influenced by the differing timelines and development cycles of individual SDRAs where further participatory consultation and engagement will be undertaken with reference to the overarching principles of Chapter 13 in relation to the SDRAs in the city. The engagement of a Community Engagement Facilitator is dependent on the above considerations, and is an operational matter.

Chief Executive's Recommendation

No change is recommended as the existing text of the Draft Plan satisfactorily responds to the issues raised.

16.3 Monitoring, Implementation and Phasing

Summary

Submissions state that annual reviews of the plan should be carried out and presented to Council to ensure successful implementation. Any such reviews should also deal with funding and accountability issues.

Submissions state that the city performance indicators included in the Plan are too narrow and need to be expanded. Some submissions suggested indicators that could be tracked including: pedestrianised areas, car parking, tree cover, charging points, Traveller accommodation, park areas, biodiversity, sustainability pricing, air quality monitoring, traffic monitoring and cycle lane length.

Chief Executive's Response

The CE notes that monitoring the delivery of infrastructure and development is critical to ensuring the effective achievement of the objectives set out in the Plan.

As set out at Section 16.2.1: Monitoring, the Development Plan will be fully reviewed two years after adoption. The two-year review will include a full schedule of all the objectives in the Plan and will measure progress being made in the implementation of each objective.

Additionally, Dublin City Council will continue to publish an annual Sustainability Report which will include accurate measurements of energy efficiency improvements, delivery of renewable energy and sustainable transport infrastructure and the overall carbon emission reductions in the city.

In accordance with current environmental legislation, further monitoring of the significant environmental effects of the implementation of the plan will be carried out in order to identify unforeseen adverse effects and to enable appropriate remedial action to be undertaken.

An additional Core Strategy Monitoring Report will also be prepared and presented to Council annually based on the plan's City Performance Indicators. Rather than duplicate other assessments, measurable City Performance Indicators are to reflect the vision and key components of the Core Strategy and are broader than the range of purely environmental indicators contained in SEA/AA monitoring for example. The annual report will be used as a means by which to communicate to the public the progress made towards the development plan vision.

Having regard to the robust and extensive nature of monitoring already proposed in the Draft Plan, it is not considered that further benefit would be derived through the addition of expanded metrics. Furthermore, some of these metrics are monitored in the Council through other forums including the Dublin City Climate Action Plan. No change is, therefore, recommended to the draft text.

Chief Executive's Recommendation

No change is recommended as the existing text of the Draft Plan satisfactorily responds to the issues raised.

Chapter 17: Glossary & Acronyms

Chapter 17: Glossary & Acronyms

Submission Number(s):

1157, 1420

Please refer to OPR summary, response and recommendations and Chapter 5.

Volume 2 - Appendices

Volume 2: Appendices

Submission Number(s):

0003, 0347, 0512, 0632, 0807, 0834, 0846, 0887, 0925, 0947, 0962, 0963, 1022, 1033, 1040, 1048, 1053, 1056, 1075, 1153, 1187, 1190, 1195, 1275, 1298, 1353, 1358, 1383, 1385, 1406, 1440, 1445, 1457, 1468, 1472, 1501, 1507, 1536, 1540, 1579, 1603, 1614, 1643, 1653, 1666, 1672, 1679, 1681, 1694, 1697, 1698, 1701, 1717, 1721, 1729, 1733, 1734, 1740, 1743, 1760, 1770, 1771, 1772, 1773, 1783, 1784, 1799, 1804, 1808, 1825, 1826, 1827, 1840, 1849, 1855, 1880, 1946, 1961, 1972, 1973, 2072, 2085, 2087, 2109, 2110, 2111, 2114, 2121, 2127, 2129, 2139

Introduction

Substantive submissions were received with respect to:

- Appendix 1: Housing Strategy Incorporating Interim Housing Need Demand Assessment (HNDA)
- Appendix 3: Achieving Sustainable Compact Growth Policy for Density and Building Height in the City
- Appendix 5: Transport and Mobility: Technical Requirements
- Appendix 6: Conservation
- Appendix 9: Basement Development Guidance
- Appendix 15: Land Use Definitions
- Appendix 16: Sunlight and Daylight
- Appendix 17: Advertising and Signage Strategy

The CE response to the issues raised are summarised below followed by recommended amendments where relevant. It should be noted that there was often an overlap between issues raised under a particular chapter in the draft plan and its associated appendix and in this regard, the CE response to each individual chapter should also be referred to.

Appendix 1

Housing Strategy Incorporating Interim Housing Need Demand Assessment (HNDA)

Section 6.3 HNDA Context and Findings

Summary

The OPR expresses general satisfaction with the population projections set out under the Core Strategy, in that they are consistent with the RSES and the NPF. They also commend the preparation of HST figures to determine the demand for 40,000 housing units over the Plan period and that the methodology is consistent with the Section 28 Housing Supply Target Methodology for Development Planning Guidelines for Planning Authorities (2020). The OPR and other submissions identify that it will be a key challenge for the Dublin City Development Plan over the next 6 years to significantly increase housing to meet the Housing Supply Target (HST) for Dublin City. Other submissions express serious concern regarding the output of HDNA modelling with reference to the Core Strategy and the need for 6.5k residential units per year that is stated to be a gross underestimate (Table 2.7 Volume 1, Projected Housing Demand for Dublin City 2020-2031) with impact on consequential HNDA modelling. The OPR also make some recommendation regarding introducing greater clarity in the presentation of Plan sections.

Chief Executive's Response

The significant importance of housing delivery is acknowledged throughout the Plan with a suite of policies and objectives aimed at activating sites and facilitating the ongoing consolidation of the city to create long term sustainable housing and communities in the city. The modelling carried out in respect of the HNDA to inform the Housing Strategy was undertaken using the toolkit provided by the Department and in compliance with their requirements. The Core Strategy and HST is a prescribed methodology and has been found to be consistent with Section 28 Housing Supply Target Methodology for Development Planning Guidelines for Planning Authorities (2020) by the OPR. No change to the Plan is, therefore, proposed with respect to housing and population targets. The CE notes the general recommendations regarding the clarity of the Draft Plan with respect to the Housing Strategy and a text amendment is proposed.

Chief Executive's Recommendation

As per response and recommendations with regard to the issues raises by the OPR with regard to Chapter 2, Core Strategy.

Volume 2: Appendix 1

Annex 1, Section 1.1 HNDA Overview,

Page: 80

Amendment:

This ~~(report summarises)~~ {annex describes} the Housing Need and Demand Assessment (HNDA) that has been prepared by KPMG Future Analytics to inform the Dublin City Development Plan 2022-2028.

Section 6.5 Specific Planning Policy Requirements (SPPRs)

Summary

Housing Mix Issues

A number of submissions oppose any unit mix standards in the North Inner City and Liberties sub-city areas in terms of 1 and 2 bed units. It is submitted that the standards are not supported by evidence, are counterintuitive and not reflective of real demand and will impact on housing delivery. Further submissions seek flexibility in the interpretation of the mix requirements or that standards only be considered and determined on a case-by-case basis to take into account the particular circumstances of sites. One submission states that the mix standard should also reflect the need to provide an increased number of residential homes, a growing number of 1-2 person households and to ensure accommodation is developed that provides greater housing choice and options for younger working adults, who are increasingly continuing to reside in the family home.

Further submissions are supportive of sub-city residential mix standards and seek that a similar analysis be undertaken for other sub-city areas to inform policies for apartment development in these areas. Other submissions express support for more 3 and 4 bedroom dwellings needed in the city.

The OPR acknowledges that the Draft Plan has provided an evidential basis for the proposed residential mix requirements in the North Inner City and Liberties sub-city areas which satisfies the requirement in Specific Planning Policy Requirement (SPPR) 1 of the Sustainable Urban Housing: Design Standards for New Apartments (2020).

The OPR also set out concerns regarding Section 15.9.1 and Table 37 of the Draft Plan relating to housing mix. They note a potential conflict with SPPR8 regarding the application of housing mix to BTR schemes

Chief Executive's Response

Section 15.9.1 and Table 37 (of the Housing Strategy) specify specific housing mix standards in the North Inner City and the Liberties Sub Area.

These standards are an appropriate policy response to (i) the modelled changing housing demand over the lifetime of the Plan which indicates a declining demand for one bed units, (ii) the current pattern of applications for developments that have high proportions of studio and one bed units and no three bed units; and (iii) a recognition of the development of higher volumes of smaller housing stock (both historic and twentieth century) in the areas.

The CE notes that the OPR has acknowledged in its submission that the Draft Plan has provided an evidential basis for the proposed residential mix requirements in the North Inner City and Liberties sub-city areas, which satisfies the requirement in Specific Planning Policy Requirement (SPPR) 1 of the Sustainable Urban Housing: Design Standards for New Apartments (2020). No change is, therefore, recommended to the mix requirements.

Some submissions seek similar mix requirements to be extended to other areas of the city. While the issues raised have been noted, this would be considered inappropriate at present, having regard to the evidential requirements imposed by Specific Planning Policy Requirement (SPPR) 1 and the existing pattern of housing stock in other areas of the city. This issue can be re-examined at a later stage as part of the review the Draft Housing Strategy and HNDA analysis post publication of Census 2022 results.

In relation to calls for flexibility in the application of the mix standards, it is considered that this would be counter-productive to the intended purpose of the standard as drafted, which already includes flexibility between reasonable minimum and maximum standards, where the objective is to provide an appropriate mix of dwelling types and sizes so as to best cater for the expected future household needs in these areas.

In relation to the OPR's comments regarding the interaction of sub-city mix requirements and BTR developments, this matter is addressed in the response to the OPR. Textual amendments are recommended under that response to provide clarity that the unit mix requirements do not apply to BTR schemes.

Chief Executive's Recommendation

As per response and recommendations with regard to the issues raised by the OPR with regard to Chapter 5, Quality Housing and Sustainable Neighbourhoods.

Co-Living Issues

Summary

Some submissions state that Dublin City Council has not evidenced the lack of need for co-living development in the HDNA, as required by the 2020 Apartment Guidelines. It is argued that there remains a clear demand for co-living units to support a broad and balanced housing market. Dublin City Council's HNDA should, therefore, be updated to properly assess co-living units and the contribution they could make towards meeting housing need over the plan period.

Chief Executive's Response

The Minister's foreword to the December 2020 Guidelines, 'Sustainable Urban Housing: Design Standards for New Apartments' indicates that "given the scale, location and potential impact of co-living development permitted to date... there are sufficient shared accommodation/co-living units either permitted or subject to consideration within the planning system" to demonstrate the concept and support the presumption against the granting of planning permission for co-living development.

The results of the HNDA carried out as part of the draft Housing Strategy analysis do not indicate a strong or specific demand for shared accommodation/co-living in Dublin City. It is, therefore, considered appropriate for the Dublin City Development Plan 2022-2028 to provide a policy presumption against shared accommodation/ co-living type developments in compliance with the December 2020 Guidelines to avoid mono tenure and mono type schemes. No change to the Draft Plan is recommended.

Chief Executive's Recommendation

No change to the Plan with respect to policy presumption against shared accommodation/ co-living type development.

BTR Standards

Summary

A number of submissions reference BTR policies and standards in the general context of the Housing Strategy. For clarity and consistency, all issues raised regarding BTR Standards are summarised and responded to in the CE's Report under Chapter 5, Quality Housing and Sustainable Neighbourhoods.

See also preceding primary summary, response and recommendations with regard to the issues raised by the OPR with regard to Chapter 5, Quality Housing and Sustainable Neighbourhoods, in relation to BTR developments.

Chief Executive's Response

Please refer to Chapter 5 and response to the OPR.

Chief Executive's Recommendation

As per Chapter 5 and response to the OPR.

Section 7.0 Meeting Social & Affordable Housing Demand

Summary

A number of submissions raise queries with respect to the outcome and forecasts of the HNDA analysis carried out to inform the Housing Strategy. Submissions variously state that the HNDA is flawed in respect of: an underestimate of need for social housing requirements; failure to include those in unsuitable housing; distortion of average household size; failure to include HAP tenancies; under provision for one bed units; overprovision for three bed units, etc. It is further stated that the Housing Strategy does not set out a strategy to provide for housing to meet the forecast future housing need.

A submission received references the Large-scale Residential Development (Amendment) Act 2021, enacted after the release of the Draft Plan and seeks an update of the Housing Strategy to include estimates of the need for houses and duplexes for purchase by intending owner-occupiers. It is stated that it is essential that this exercise now be undertaken to ensure that the Plan properly accounts for the need for a supply of housing for purchase by owner-occupiers.

In terms of tenure, the LDA welcomes the intention of the Housing Strategy to provide for a variety of housing typologies and tenures that are adaptable and flexible in order to meet changing family needs over the family lifecycle and throughout people's lives. The LDA also recommends that the Housing Strategy references the need to accommodate a range of household types, including single people, key workers and cohabiting couples on lower incomes who require high quality homes within the city.

Chief Executive's Response

The modelling carried out in respect of the HNDA to inform the Housing Strategy, Core Strategy and HST is a prescribed methodology and has been found to be consistent with Section 28 Housing Supply Target Methodology for Development Planning Guidelines for Planning Authorities (2020) by the OPR. Additionally, the CE notes that the OPR has acknowledged in its

submission that the Draft Plan has provided an evidential basis for the proposed residential mix requirements which satisfies the requirement in Specific Planning Policy Requirement (SPPR) 1 of the Sustainable Urban Housing: Design Standards for New Apartments (2020).

In response to the contention that the Housing Strategy does not set out a strategy to provide for housing to meet the forecast future housing need, the CE notes that the significant importance of housing delivery is acknowledged throughout the Plan with a suite of policies and objectives aimed at activating sites and facilitating the ongoing consolidation of the city to create long term sustainable housing and communities in the city. The Housing Strategy set out in Appendix 1, will be the key planning mechanism for the delivery of new affordable housing and sustainable communities.

The CE notes Section 8.1 of Appendix 1, Housing Strategy and Interim HNDA Key Policy Recommendations (Page 76) that details recommendations to inform the Draft Plan housing delivery approach including to:

- To facilitate the maximum allowable provision under the Planning Act (as amended) for affordable and social housing provision as part of future planning permissions.
- To require that 20 percent of land zoned for residential use, or for a mixture of residential and other uses for development of four or more units or development of units on land more than 0.1 hectares be reserved for the provision of, social, affordable purchase and cost rental housing.
- To provide for social, affordable purchase and cost rental housing accommodation through a range of delivery mechanisms including new builds, acquisitions, renovations and acquisitions of vacant homes, leasing, and housing supports or any other mechanism promoted or forthcoming under Government Housing Policy.

Therefore, it is considered that the substantive issues raised are adequately addressed by the current text of the Draft Plan Housing Strategy and no change is recommended.

The CE notes the enactment of the Planning and Development (Amendment) (Large-scale Residential Development) Act 2021 in December 2021. Section 7 amends Part V of the Planning and Development Act so that the Housing Strategy shall take into account that the need for housing, in particular, houses and duplexes, for purchase by intending owner occupiers, is provided for and estimated in its Housing Strategy. A text amendment is proposed to reflect the provisions of the amendment with respect to the Housing Strategy in the context of Dublin city.

The CE notes the comments made by the LDA with respect to a recommendation that the Housing Strategy references the need to accommodate a range of household types. The CE considers that the existing text responds to this point within the defined framework of the housing strategy and the HNDA and no amendment is proposed

Chief Executive's Recommendation

Volume 2: Appendix 1
Section 3.1, Legislative Context
Page 6

Amendment:

Section 94 (3) of the Act (as amended by the Affordable Housing Act 2021 {and the Large-scale Residential Act 2021}) specifies that in preparing such a housing strategy, a planning authority shall take into account:

- The existing need and likely future need for housing for the purposes of the provision of social housing support , affordable dwellings and cost rental housing;
- The need to ensure that housing is available for persons who have different levels of income;
- The need to ensure that a mixture of house types and sizes is developed to reasonably match the requirements of the different categories of households, as may be determined by the planning authority, and including the special requirements of older people and persons with disabilities;
- The need to counteract undue segregation in housing between persons of different social backgrounds: and,
- {The existing need and the likely future need for housing, in particular houses and duplexes, for purchase by intending owner-occupiers}.

Volume 2: Appendix 1

Section 3.1, Legislative Context

Page 8 insert new paragraph after second bullet point

Amendment:

{The Planning and Development (Amendment) (Large-scale Residential Development) Act 2021 was signed into law in December 2021. In addition to the provisions regarding large scale residential development, Section 7 amends Part V of the Planning and Development Act so that the housing strategy prepared by a local authority shall take into account the need to ensure that the existing need and the likely future need for housing, in particular houses and duplexes, for purchase by intending owner occupiers, is provided for and estimated in its Housing Strategy.}

Volume 2: Appendix 1

Section 6.3.3 HNDA Forecasts

Page 39.

Insert new text as second paragraph

Amendment:

{The HNDA estimates a housing need for nearly 5,000 households during the Plan period in the owner-occupier sector. It is anticipated that apartment development will be the predominant housing type in this sector over the Plan period having regard to observed intercensal trends and to the policy framework set out at a national and regional level to promote compact growth and sustainable settlement patterns throughout the city.}

Section 7.2.3 Specialist Provision Support from Dublin City Council

Subheading: Meeting the Housing and Accommodation Needs of the Travelling Community

Summary

The OPR states that it is considered that the inclusion of a policy of general support for the TAP does not serve to communicate clear and implementable objectives for the provision of

accommodation for Travellers. The OPR recommends the inclusion of the identified specific locations for the provision of accommodation for Travellers to be indicated on the land use zoning maps contained in adopted City Development Plan.

Chief Executive's Response

Please see preceding primary summary, response and recommendations with regard to the issues raised by the OPR with regard to Chapter 5, Section: 5.5.5 Housing for All, subheading Traveller Accommodation.

The CE recommends a textual update with regard to Dublin City Council Traveller Group Housing Schemes and Traveller Halting Sites.

Chief Executive's Recommendation

Volume 2: Appendix 1

Section 7.2.3 Specialist Provision Support from Dublin City Council

Meeting the Housing and Accommodation Needs of the Travelling Community

Page: 67, paragraph 2

Amendment:

~~(Group Housing is provided at Cara Park and Northern Close, Coolock; Avila Park and St Mary's Park, Finglas; Labre Park and Kylemore Grove, Ballyfermot; and Bridgeview, Clondalkin. Halting Sites are provided at Tara Lawns, Coolock; St Margaret's Park, Ballymun; St Joseph's Park, Finglas and St Oliver's Park, Clondalkin.)~~

{Dublin City Council Traveller Group Housing Schemes and Traveller Halting Sites

| <u>North Central Area</u> | | |
|----------------------------------|----------------------|--|
| <u>Cara Park/ Close</u> | <u>Group Housing</u> | <u>Belcamp Lane, Coolock, D17</u> |
| <u>Tara Lawns</u> | <u>Halting Site</u> | <u>Belcamp Lane, Coolock, D17</u> |
| <u>Northern Close</u> | <u>Group Housing</u> | <u>Belcamp Lane, Coolock, D17</u> |
| <u>Grove Lane</u> | <u>Group Housing</u> | <u>Malahide Road, D17</u> |
| <u>North West Area</u> | | |
| <u>Avila Park/Close/ Gardens</u> | <u>Group Housing</u> | <u>Cappagh Road, Finglas, D11</u> |
| <u>St. Margaret's Park</u> | <u>Halting Site</u> | <u>St Margaret's Road, Ballymun, D11</u> |
| <u>St. Mary's Park</u> | <u>Group Housing</u> | <u>Dunsink Lane, Finglas, D11</u> |
| <u>St. Joseph's Park</u> | <u>Halting Site</u> | <u>Dunsink Lane, Finglas, D11</u> |
| <u>South Central Area</u> | | |

| | | |
|---|--------------------------------------|---|
| <u>Labre Park/ Kylemore Grove</u> | <u>Group Housing</u> | <u>Kylemore Road, Ballyfermot, D10</u> |
| <u>St. Oliver's Park</u> | <u>Halting Site</u> | <u>Cloverhill Road, Clondalkin, D22</u> |
| <u>Bridgeview</u> | <u>Group Housing</u> | <u>Cloverhill Road, Clondalkin, D22</u> |

1

Volume 2: Appendix 1

Section 7.2.3 Specialist Provision Support from Dublin City Council

Meeting the Housing and Accommodation Needs of the Travelling Community

Page: 68.

Amendment:

Insert map - Map of Dublin City Council Traveller Group Housing Schemes and Traveller Halting Sites

Subheading: Meeting the Housing Needs of Older Persons and Persons with Disabilities

Summary

Submissions state that the Housing Strategy and Plan should be more ambitious with respect to Universal Design Targets, specifically that targets should be higher at 50% of apartments in excess of minimum sizes that are required.

Chief Executive's Response

The CE notes the issues raised in respect to Universal Design targets and having regard to the Universal Design Guidelines for Homes in Ireland 2015, and to the DHLG&H's Design Manual for Quality Housing 2022, it is considered that amendment of Appendix 1 and Objective QHSNO10 (Chapter 5) regarding Universal Design targets is appropriate for consistency and to support Dublin City Council's commitment to implement the framework for the delivery of housing for persons with disabilities set out under the 'National Housing Strategy for People with Disability 2011–2016' and its successor, the National Housing Strategy for Disabled People 2022 – 2027.

Please see also response to Chapter 5, Quality Housing and Sustainable Neighbourhoods for substantive response to the issues raised.

Chief Executive's Recommendation

To note that the proposed amendment to Objective QHSNO10 is shown in responses to Chapter 5, Quality Housing and Sustainable Neighbourhoods. Please see also response to Chapter 15, Section 15.9.2 Unit Size / Layout for further consequential amendments. Changes to Appendix 1 are shown below.

Volume 2 Appendices

Appendix1 Housing Strategy Incorporating Interim Housing Need Demand Assessment (HNDA)

7.2.3 Specialist Provision Support from Dublin City Council

Subheading: Meeting the Housing Needs of Older Persons and Persons with Disabilities

Amendment:

Page 70: Paragraph 1

This housing strategy will facilitate the implementation of Dublin City Council's Strategic Plan for Housing People with a Disability 2016, and its successor currently being drafted. Dublin City Council is also committed to implementing the framework for the delivery of housing for persons with disabilities set out under the ~~(‘National Housing Strategy for People with Disability 2011–2016’ and its successor)~~ {National Housing Strategy for Disabled People 2022 – 2027}. The strategy is about facilitating the provision of housing options and related services to persons with disabilities to allow individual choice and support independent living.

~~(A new national strategy, National Housing Strategy for Persons with Disabilities 2022–2027 is being developed with the objective of facilitating the provision of housing options and related services to people with disabilities to allow individual choice and support independent living. The provisions of the new national strategy will be incorporated into any forthcoming review of the development plan.)~~

Page 70: Paragraph 2

Dublin City Council is committed to implementing Universal Design models to all new developments and encouraging private developers to incorporate them into all residential dwelling design proposals having regard to the Universal Design Guidelines for Homes in Ireland, published by the National Disability Authority in 2015. All new housing should be designed in a way that is adaptable and flexible to the changing needs of the homeowner as set out in the Lifetime Homes Guidance contained in Section 5.2 of the Department of Environment, Heritage and Local Government ‘Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities’ (2007) {and to the Department's Design Manual for Quality Housing 2022.} In line with Part M of the Building Regulations (as amended), all public and private buildings must also have provision for suitable access and use for all persons.

7.2.3 Specialist Provision Support from Dublin City Council

Subheading: Meeting the Housing Needs of Older Persons and Persons with Disabilities

Page: 72, third paragraph

Amendment:

~~(This housing strategy will support a commitment whereby a minimum of 10 percent of dwellings in all schemes over 100 units are designed to accommodate people with disabilities and older people in accordance with the Universal Design Guidelines for Homes in Ireland, 2015.)~~

{This housing strategy will support an objective to ensure that 50% of apartments in any development that are required to be in excess of minimum sizes should be designed to be suitable for older people/mobility impaired people and people with disabilities in

accordance with the guidelines set out in the Universal Design Guidelines for Homes in Ireland 2015, the DHLG&H's Design Manual for Quality Housing 2022 and the DHP&LG & DH's Housing Options for Our Ageing Population Policy Statement 2019.}

Subheading: International Protection Applicants

Summary

A submission states that the Government has announced a plan to end Direct Provision and that no account has been taken in the Housing Strategy of the needs of households who will exit Direct Provision under this Plan.

Chief Executive's Response

The Draft Plan seeks to promote equality and progressively reduce all forms of social exclusion and facilitate the needs of all that can experience a sudden need for housing provision. The Council will work with other statutory agencies to facilitate and support appropriate accommodation and to improve the range and quality of services available as provided for by Policy QHSN31. It is, therefore, considered that the policy and supporting text contained in the Draft Plan at Chapter 5, Provision of Refuges and Emergency Accommodation (Page 180) and Appendix 1, subheading International Protection Applicants (Page 72) addresses the matter raised having regard to emerging Government policy in responding to the accommodation needs of international protection applicants and those in need of refuge.

Chief Executive's Recommendation

No change is recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Subheading: Households Experiencing Homelessness and Rough Sleeping

Summary

Consequential amendments to the Housing Strategy are required for consistency arising on foot of issues raised and CE Recommendations on Chapter 5, Section: 5.5.5 Housing for All, Page: 176.

Chief Executive's Response

Consequential amendments from Chapter 5 issues.

Chief Executive's Recommendation

To amend text for consistency from Chapter 5 issues/ amendments.

**Amendment to Appendix 1;
Appendix 1. Page 17**

{Housing First National Implementation Plan 2022-2026

Housing First is a housing-led approach that enables people with a history of rough sleeping or long-term use of emergency accommodation, and with complex needs, to

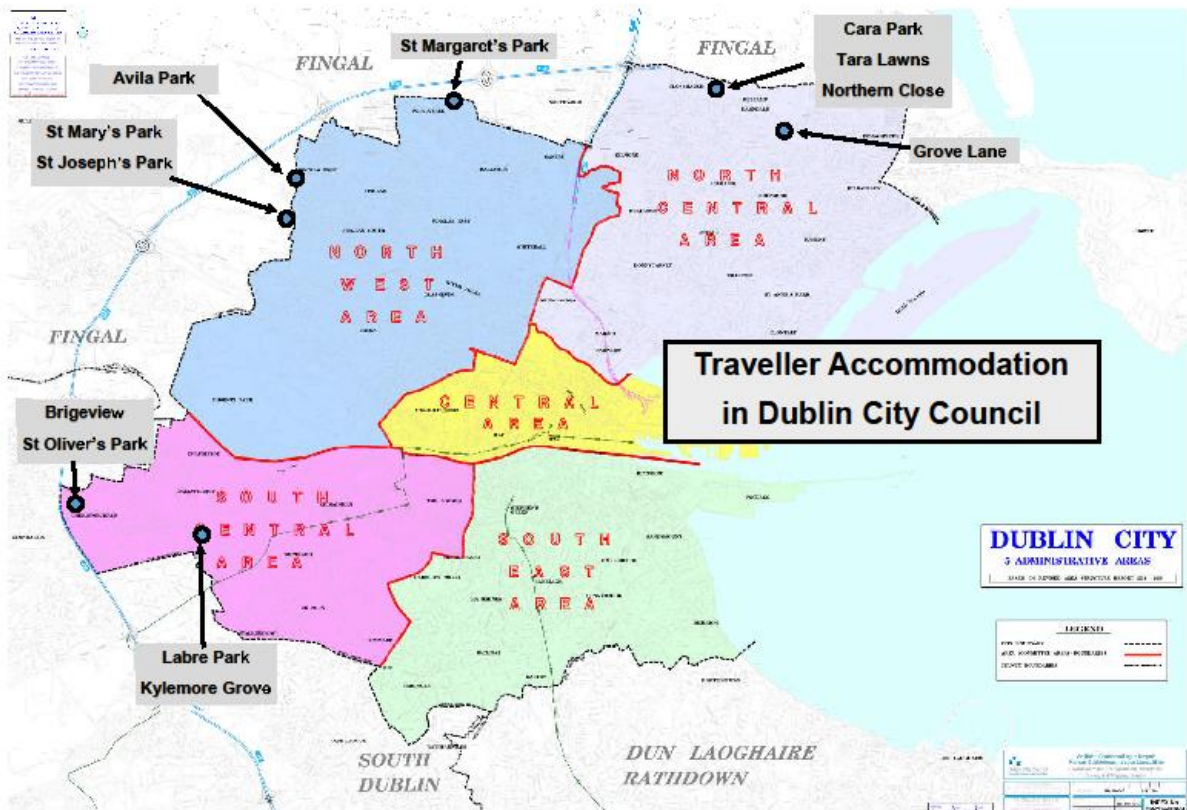
obtain permanent secure accommodation, with the provision of intensive supports to help them to maintain their tenancies.}

~~(Housing First National Implementation Plan 2018–2021~~

~~This implementation plan was launched by the Minister of Housing and the Minister of Health in September 2018. The key principles of the Housing First approach are stated whereby housing will be provided to rough sleepers and the long-term homeless alongside a range of supports. The plan sets targets for each Local Authority area to deliver.)~~

Appendix 1. Page 69. Last Paragraph

Dublin City Council will support the implementation of the Homeless{ness} Action Plan Framework for Dublin 2019-2021 or any subsequent review {and the Housing First National Implementation Plan 2022-2026} and support related initiatives to address homelessness.



Appendix 3

Achieving Sustainable Compact Growth Policy for Density and Building Height in the City

Summary

A number of submissions were made regarding the approach to building height and density in the city as they pertain to Appendix 3. The broad range of submissions relating to this area ranged from support for taller buildings and higher densities, to strong opposition for any proposals with potential to impact on the established character of the city. Accordingly, there is a broad range of requests to amend the height and density guidelines. The substantive issues raised are summarised and responded to separately.

See also Chief Executive's Response and Recommendations in relation to the policy issues raised regarding height and density at Chapter 4, Shape and Structure of the City.

Height

Summary

A number of submissions seek low rise height thresholds and consider that separate height strategies or masterplans should be prepared for different areas of the city such as for Rathmines or Rathgar, with specific benchmark heights set. Other submissions object to building upwards in residential areas because it is considered that any higher building would be out of character with the surrounding area. Concerns are raised regarding the consideration of built heritage and protection for conservation areas in the outer and inner suburbs. Some submissions request that the Plan identify where specific landmark buildings will be located and for these locations to be subject to local area plans.

A number of submissions express general support for the construction of quality high-rise apartments at high levels of density to provide for housing needs. There is support for appropriate higher buildings close to public transport and in office districts. However, it is detailed in some submissions that a common sense, rather than ideological approach should be taken and that excessive height in the city centre should not be supported.

Some submissions seek to have a more flexible approach applied to the management of general heights in the city where all proposals are assessed on a case by case basis, particularly in the city centre or within the canals. Similarly, it is requested that the presumption against and the limitations on landmark/ tall buildings outside of locations specifically identified be reconsidered, and that any restrictive statements be reworded to allow for greater flexibility in the Plan. A number of submissions urge the Plan to be more ambitious in relation to height and to actively encourage higher building development. It is stated that higher buildings could be encouraged with the removal of masterplan requirements on sites over 0.5ha.

Chief Executive's Response

The new policy approach taken to manage building height and density in the city as expressed in Chapter 4, Shape and Structure of the City and Appendix 3, Achieving Sustainable Compact Growth Policy for Density and Building Height in the City, is based on a combination of location and performance criteria. The purpose of the policy approach in the Plan is to set out clear guidance on how to achieve compact sustainable growth in the city and to ensure consistency with the Urban Development and Building Heights Guidelines for Planning Authorities. Section

6.0 in Appendix 3 comprehensively and specifically addresses the issue of higher buildings in areas of historic sensitivity.

The location and performance- based criteria detailed in Appendix 3 will ensure that a form and intensity of urban development is achieved that contributes to the creation of high-quality places for people to live and work while ensuring the highest standard of design and the protection of the existing amenities. The policy approach taken is considered balanced and reasonable having regard to the role of Dublin City as the capital city, competing with other city regions internationally, whilst acknowledging the need to protect the intrinsic quality of Dublin as a predominantly low-rise city, and to protect conservation areas, the architectural character of existing buildings and streets and spaces of artistic, civic or historic importance.

With regard to calls for flexibility or similar derogations with regard to building heights, it is considered that Appendix 3 provides a logical framework to manage future development proposals, where the general principle is to support increased height and higher density in the right location. The Key Criteria and Performance Criteria to be used when assessing future development proposals are sufficient to provide a basis to consider enhanced scale in certain circumstances depending on the site's location and context. Specific locations have been identified in Appendix 3 (Pg. 223) as generally suitable and appropriate for accommodating a more intensive form of development, including increased height.

The CE response to the requirement for masterplans for sites over 0.5 ha is addressed under the response to the submission by the OPR. It is recommended that this requirement is updated to increase the threshold to 1ha.

In relation to landmark or tall buildings, the Plan is clear that appropriately located landmark/ tall buildings can make a positive contribution to the city but equally have the potential to have a significant detrimental impact on local character and the wider city, if the location or design is unsuitable. Therefore, the location of such buildings will be restricted to instances where there is a compelling architectural and urban design rationale and where it can be demonstrated that they make a significant contribution to regeneration and the economic, strength, performance and resilience of the city.

There is a general presumption against landmark/tall buildings outside of the locations specifically identified in the Draft Plan as being suitable for the provision of same in the Plan and in LAP's / SDZ's unless in exceptional circumstances and where it can be demonstrated that there is a compelling architectural and urban design rationale for such a development. Given the significant detrimental impact an unsuitable development can have on the city's character, this approach is considered measured and not unduly onerous given that there are limited areas in the city that are capable of sustaining the economic and environmental impact of such landmark/tall buildings.

Chief Executive's Recommendation

Please also refer to the CE's Recommendation to Chapter 4 and to the OPR.

Density

Summary

A number of submissions query the treatment of density under the Draft Plan. A proportion of the submissions seek to have a 'cap' on density at 300 units per hectare omitted at Table 1 in

Appendix 3, whereby density should be able to exceed this 'target' based on criteria similar to plot ratio and site coverage. It is stated that the proposed approach to density could adversely impact on the delivery of high-quality development within the city if considered as a strict cap. This would be considered contrary to the objective to provide for compact growth and lacks ambition.

Other submissions suggest that higher density would be appropriate in certain circumstances or locations such as adjoining major public transport corridors, where an appropriate mix of residential and commercial uses is proposed, to facilitate comprehensive re-development in areas in need of urban renewal, to maintain existing streetscape profiles, where a site already has the benefit of a higher density, or to facilitate the strategic role of significant institutions/employers, etc.

Further submissions call for densities be reviewed and made lower with a cap at 200 units per hectare, or that different lower density scales should apply to different areas, for example to the canal belt. Submissions call for further detail seeking to have locations for particular densities set out or to be decided in a Local Area Plan or neighbourhood plan.

Chief Executive's Response

Achieving higher densities across the city is a challenge, but by seeking higher densities close to public transport, encouraging regeneration through SDRAs and the development of vacant and underutilised sites, the Plan can help achieve sustainable urban consolidation and compact growth.

With regard to calls for the density ranges expressed at Table 1: Density Ranges, (Appendix 3, Page 219) to be lowered or to be more restrictive, it is noted that it is a policy requirement under Section 28, Guidelines on Sustainable Residential Development in Urban Areas 2009, that densities of scale be promoted in sustainable locations within Dublin City. In this regard, the density ranges in the Draft Plan recognise that development land is a finite resource within the city area and that the housing output of such lands should be maximised to meet housing demand, subject to appropriate safeguarding criteria. It is considered that sufficient locational guidance is already expressed in Appendix 3 having regard to Table 1: Density Ranges and to Section 4.0 The Compact City – How to Achieve Sustainable Height and Density? (page 224).

With regard to comments that that Plan is too restrictive or unambitious regarding density, it is considered that the promotion of sustainable densities and the supporting rationale is satisfactorily addressed under Chapter 4 and in Appendix 3. Appendix 3 clearly sets out the proposed density ranges (Table 1: Density Ranges) that will be generally supported. It is noted that schemes in excess of 300 units per hectare can be considered but only in exceptional circumstances where a compelling architectural and urban design rationale has been presented and as such, there is no "cap" as stated in submissions. Excessive density however can be problematic. Significantly higher density schemes, particularly when coupled with higher buildings, can generate problems in terms of creating successful, well designed and sustainable communities. It is, therefore, not considered appropriate to amend Table 1: Density Ranges.

Chief Executive's Recommendation

No change is recommended to Appendix 3 as existing text satisfactorily responds to issues raised. Please also refer to the CE response to Chapter 4.

Appendix 5

Transport and Mobility: Technical Requirements

Section 4.0 Car parking Standards

Summary

Submissions raised concern around the car parking standards and flexibility around the application of standards to places of work and planning applications already submitted prior to the adoption of the final plan and suggest a phased approach to the implementation of the zero car parking for commercial developments. A submission raised concern that the application of a zero car parking standard for commercial developments may impact on the ability to attract Foreign Direct Investment to Dublin. An Post and Diageo in their submissions request flexibility in maximum car parking standards for postal centres and breweries to facilitate operational requirements. Submissions also note that adequate car parking for disabled and age friendly should be provided in all developments. A submission also noted that the reduction in the maximum car parking spaces for residential developments from 1.5 spaces to 1 space per unit may impact on the viability of a scheme. Another submission noted that Zone 3 should state 0-1.5 spaces per unit to align with the NTA's Transport Strategy for the GDA. While a number of submissions outlined concerns regarding the limits to car parking, a number of submissions also offered their support for the application of restrictions to parking.

Chief Executive's Response

It is recognised that a level of car parking is required to enable people of all ages and abilities to live in the city. In practice, a case by case approach is taken to development sites with bespoke mobility strategies developed with applicants that are informed by the location of the site, accessibility to public transport, the range of facilities and amenities within easy walking and cycling distance and census and other data regarding travel patterns and car ownership. Reduced parking levels are supplemented by the provision of shared car schemes to be in place upon occupation as well as high quality cycle parking provision. The reduction in the maximum standard for employment (offices) in zone 1, City Centre, in favour of accessible and fleet/shared car schemes, has been provided in the Draft Plan to strengthen existing policies discouraging commuting by private car and to assist in achieving more ambitious targets for sustainable movement.

In relation to the flexibility around parking requirements for business operations, there is a footnote at the end of Table 2 in Appendix 5 where car parking above maximum permitted standards may be acceptable in very limited circumstances at the discretion of Dublin City Council. In all cases, the applicant must fully engage with Dublin City Council at pre-application stage regarding the acceptability of departure from maximum standards. It is policy of DCC to discourage commuter parking and parking at destination where alternative modes are available. However, there is recognition that parking standards for operational purposes may differ in some instances. It is not considered necessary to amend the parking standards to address the operational concerns raised by the submissions. These matters will be dealt with as and when they arise through the Development Management process where a robust mobility management strategy for sites is developed in consultation with DCC. Similarly, where applications have been made based on 2016-2022 maximum car parking standards, but will be decided post adoption of the 2022-2028 plan and car parking standards, these situations will be dealt with as they arise through the Development Management process and appropriate levels of car parking will be permitted in the context of robust mobility strategies for each site.

In relation to accessible parking provision, Section 4.2 of Appendix 5 addresses the provision for accessible parking within developments (minimum 5%) and further policy support is noted in Chapter 8 regarding accessible parking.

Chief Executive's Recommendation

No change is recommended to Appendix 5 as existing text satisfactorily responds to issues raised, save for amendments recommended in the response to the submission from the National Transport Authority (NTA).

Section 5.0 Electric Vehicles (EV)

Summary

A submission from Electricity Supply Board (ESB) in relation to parking for Electric Vehicles notes that the EU Energy Performance of Buildings Directive calls for an increase to 20% for the number of parking spaces which should have provision for electric vehicle charging infrastructure. The submission sets out a recommendation for the minimum requirement for EV Charging Point Standards in residential and non-residential developments.

Chief Executive's Response

The comments from the Electricity Supply Board (ESB) are noted and welcomed. Section 5.0 of Appendix 5 currently provides for a minimum of 50% of all car parking spaces to be equipped with a fully functional EV Charging Point(s) and for the remaining spaces to be designed to facilitate the rollout of future EV Charging. This requirement applies to all new developments and all new or upgraded commercial operated car parking developments are also required to provide for a minimum of 50% of spaces with EV charging facilities.

Chief Executive's Recommendation

No change is recommended to Appendix 5 as existing text satisfactorily responds to issues raised.

Appendix 6

Conservation

Summary

Lower Kimmage Road Residents Association welcomes the protection and conservation of ground surfaces for Kimmage Road Lower as outlined in Appendix 6 and states that the continued preservation of the Rathmines Township boundary markers are of significance.

Some submissions raised the visible damage to pavements, including granite edging caused by mechanical leveraging and lifting of skips and comment that this matter needs to be considered in collaboration with waste management experts and alternate designs sought.

Several submissions objected to the removal of the historic street surface at Castle Market and Temple Bar and request the street surface is restored.

Many submissions expressed concern that in many parts of the City, the original historic paving, historic street cobblestones or setts have been removed by DCC and replaced by inferior modern granite or in some instances, concrete slabs or tarmacadam cover.

The Department of Housing, Local Government and Heritage request that the following documents are referenced in Volume 2, Appendix 6, Section 4.3 pages 300-301: *Archaeology in the Planning Process*, Planning Leaflet 13, Office of the Planning Regulator and the Department of Housing, Local Government and Heritage, January 2021 and *Built and Archaeological Heritage Climate Change Sectoral Adaptation Plan*, Department of Culture, Heritage and the Gaeltacht, September 2019.

It was submitted in one submission that the design standards for pavements need to be amended.

There were several requests to protect the cobblestones of Temple Bar and comments that the tradition stone paving on many streets in Temple Bar are in a deplorable state despite their inclusion on the schedule in Section 1.1 Stone Setts and Associated Features to be Protected, Conserved or Reintroduced in Appendix 6 of the Draft Plan. This section states that 'all works to historic surfaces shall follow the provisions of the City Council's Historic Street Surfaces in Dublin: Conservation Study and Guidance Manual (2009) and the Advice Series on Paving -The Conservation of Historic Ground Structures (2015)'. Temple Bar Residents request an addition to this as follows 'using the fine example of May Lane, between Bow Street and Church Street, as a template' Temple Bar residents also call for the reinstatement of traditional stone paving at all pedestrian crossings in Temple Bar and request that this should be explicitly stated in Section 1.1 along with a commitment to reinstate missing granite kerbstones in the city centre.

Chief Executive's Response

The CE notes the comments of the Kimmage Road Residents Association. Issues regarding maintenance of street paving is an operational matter.

The temporary replacement of historic street surfaces in areas such as Castle Market and Temple Bar are operational issues and will be addressed in the implementation of public realm projects for these areas.

With regard to removal of historic paving, this is an operational matter. In certain locations, historic surfaces have been temporarily removed and stored pending implementation of public realm projects for these areas.

The comments from the Department regarding reference to various policy documents is noted and a textual amendment is recommended in this regard.

With regard to design standards, this is not a matter for the Draft Development Plan. The current design standards accord with national guidance published by the Department of Housing, Local Government and Heritage, in the *Advice Series on Paving -The Conservation of Historic Ground Structures* (2015).

The issue raised regarding Temple Bar are considered an operational matter. Appendix 6, sub-sections 1.1 and 2.1 and 2.2 provide for the protection, conservation or reintroduction of the respective historic street surfaces (stone setts, granite flags and kerbing) in the streets and spaces listed in the schedules. The removal and storage of historic street surfaces in Temple Bar, and their temporary replacement with macadam and other surface, will be addressed by the implementation of public realm project for the area. Technical amendment required to sub-section 2.1 (p. 284) to read sub-section 2.2.

Chief Executive's Response

Policy BHA18: Historic Ground Surfaces, Street Furniture and Public Realm addresses the issues raised regarding historic street surfaces and their maintenance and improvement across the city, together with the provisions of Volume 2, Appendix 6. The issues raised regarding the temporary replacement of historic street surfaces in areas such as Castle Market and Temple Bar are operational and will be addressed in the implementation of public realm projects for these areas.

The Chief Executive recommends amendments to the schedule of Guidelines provided at Appendix 6, Section 4.3 to update relevant national policy documents.

The issues raised by the DHLGH are addressed in the CE report in Chapter 11; and in proposed amendments to Map L.

A minor technical amendment is recommended in relation to the numbering of sub-sections in Appendix 6, Section 2.

Chief Executive's Recommendation

Appendix 6

Section 4.3

Page: 300

Amendment:

Archaeology **(and)** **{in}** the Planning Process **{{(Planning Leaflet 13; 2021)}**

- **{Built and Archaeological Heritage Climate Change Sectoral Adaptation Plan, (2019).}**

Appendix 9

Basement Development Guidance

Summary

Submissions received in relation to Basement Development Guidance seek the removal of the requirement for Basement Impact Assessment to be carried out as part of the planning process as it is considered onerous, unwarranted in most instances and will add an additional layer of complexity in planning applications and impact timelines.

Submissions also call for the removal of the presumption against the development of basements in particular circumstances, i.e. protected structures and conservation areas.

Chief Executive's Response

Chapter 15, Development Standards, Table 15-1: Thresholds for Planning Applications (Page 640), outlines that Basement Impact Assessment will be required for all developments that include basement levels. Appendix 9, Basement Development Guidance, sets out general guidance regarding basement developments including the information to be contained in a Basement Impact Assessment and should be cross referenced with para 15.18.4.

The extent of information to be contained within such studies will vary depending on site specific circumstances and as stated in Appendix 9, the nature and scope of the assessment required can be agreed with Dublin City Council prior to the lodgement of any planning application, having regard to the particular site and development characteristics.

Given the potential for basements to affect the environment and nearby structures in a number of ways e.g. geological, hydrological and hydrogeological impacts, the requirement that a Basement Impact Assessment shall accompany all planning applications that include a basement is considered necessary and not unduly onerous. Similarly, the policy to generally discourage any significant underground or basement development below ground level of, or adjacent to, residential properties in conservation areas or to protected structures (section 15.18.4, Page 761 and Appendix 9) is considered reasonable.

Chief Executive's Recommendation

No change to Draft Plan.

Appendix 15

Land Use Definitions

Summary

A submission requests that the Draft Plan include a definition of 'Public Service Installation'.

A further submission states that the land use definition of 'Public Service Installation' is currently too broad and needs to change in the context of Z1, Sustainable Residential Neighbourhoods and Z2, Residential Neighbourhoods (Conservation Areas) zoning categories. This change is necessary to stop the development of full-scale industrial complexes in unsuitable locations.

Chief Executive's Response

The CE notes that a land use definition of 'Public Service Installation' is provided in Appendix 15, Land Use Definitions (Page 393). Service infrastructure is necessary to support existing residential land uses and to support future residential development in the city.

It is highlighted that the definitions of the various land uses in Appendix 15 are for guidance only. The definition of public services must be broad to provide for the proper separate statutory assessment of all the service installations necessary for the day-to-day functioning of the city, such as electricity, gas, telephone, radio, or telecommunications for example. For consistency of assessment, it is not considered necessary or appropriate for discrete definitions of public services to be included under each individual zoning category.

Chief Executive's Recommendation

No change to Draft Plan as existing text satisfactorily responds to the issues raised.

Appendix 16

Sunlight and Daylight

Summary

A number of submissions were received in relation to the supplementary guidance document on sunlight and daylight, forming Appendix 16 to the Draft Plan. Sunlight and daylight analysis is required as part of all apartment developments and in site specific circumstances for commercial development (Chapter 15, Table 15-1, Page 640). In the main, the general issues raised in the submissions can generally be characterised as those of a specific technical nature and those that are more general in nature, related to the status or application of the Appendix 16 Guidelines.

Section 1.0 Introduction

Submissions welcome guidance to provide clarity to the approach to assessments; however, concerns are also raised. One submission states that there is a concern that from a technical standpoint, Appendix 16 is not fit for purpose as currently drafted and has the potential to create new problems for the planning authority and for applicants.

Submissions state that while sunlight and daylight impacts are important factors in the design of residential development, they should not become the predominant determinant. Rather sunlight and daylight impacts should be one of the many factors to be considered. Some submissions seek greater flexibility stating that Appendix 16 is excessive and overly prescriptive, goes beyond current practice, international norms and the recommendations of the BRE.

Section 3.0 Guidance Standards and National Policy

Concern is raised in relation to the applicability of the relevant standards and guidance documents referenced in the document, most significantly with regard to the pending release of BR.209 3rd Edition. The timescale of release of this document threatens to introduce guidance that may be at odds to significant elements of Appendix 16 as currently proposed which is, therefore, premature. Clarification is requested that if a revised version of BR.209 is to be issued, the guidance within this new version will take precedence.

Concern is raised regarding the status of some of the documents referenced and relied upon in the context of the Irish planning process, such as the United Kingdom's BS EN 17037. Given that the standards in this area are rapidly evolving, it is suggested that reference to the relevant BRE or equivalent standard is more appropriate, particularly in the context of Section 28 guidelines.

Section 4.0 Relevant Metrics & 5.0 Assessment Methodologies

With reference to the various technical aspects of Appendix 16, the following points summarise the nature of issues raised in the submissions received where alteration is requested:

- Include Vertical Sky Component (VSC) in Section 4.0 as it is an important method in determining the effect a development has on daylight received by neighbouring properties.
- Alter Section 5.1 to state that Annual Probable Sunlight Hours (APSH) / Winter Probable Sunlight Hours (WPSH) assessment only to be carried out on living rooms windows rather than all windows, in accordance with BRE Guidelines.
- Section 5.1 of Appendix 16 currently calls for sunlight adequacy within proposed accommodation to be assessed with regard to APSH (assessed over a full year with clouds accounted for) while EN17037 calls for this measure to be assessed with respect to solar access.
- Include 25-degree angle consideration in Section 5.3, in accordance with BRE Guidelines.
- Acknowledge that minimum standards should be expected at the discretion of the Council having regard to the characteristics of a site.
- Section 5.3 of Appendix 16 currently calls for set reflectance values and goes as far as stating “Deviations from these values shall not be accepted”. In contrast section B.3.1 of BS EN 17037 allows for variety and it states, “Deviations from these ranges are of course permitted, but justification should be given”.
- Section 5.3 currently calls for a fixed maintenance factor, while NA.3 of BS EN17037 recommends different values for different contexts.
- Section 5.3 currently calls for a grid height of 0.7m for commercial properties while EN 17037 calls for a grid height of 0.85m.
- Appendix 16 states that when determining input factors for simulations, the criteria in Table 1 shall be applied with no deviations accepted. This leaves very little flexibility.

Chief Executive’s Response

Good sunlight and daylight contribute to the liveability of residential units and healthy workspaces. Standards are required to enable the proper impact of a development on surrounding properties to be established as well as to determine the quality of amenity in any proposed development (Chapter 15, Page 702).

The CE notes the issues raised in the submissions, many of which recognise that challenges exist in seeking to provide clarity and consistency in the treatment of how daylight and sunlight assessments are completed in Ireland. There is a recognised lack of clarity regarding the appropriate standards, methods and metrics that need to be applied, as well as how presented results should be interpreted and benchmarked, particularly taking into account the requirements under section 28 guidelines to have appropriate and reasonable regard to identified sunlight and daylight standards.

It is noted that Section 7.0, Assessing Results (Page 414) clarifies that results may be interpreted with flexibility depending on the site circumstances. Furthermore, Section 7.0 clarifies that the planning authority will apply balance and consider the wider impact of a development beyond matters relating to daylight and sunlight. However, on foot of the issues raised in the

submissions, it is considered appropriate to amend Appendix 16 to introduce greater clarity to the document in this regard.

The CE recognises that we are currently in a transitional period in terms of guidance from BR 209, BS 8206-2, and BS EN 17037. If over the coming years, a revised version of BR 209 is to be issued, the guidance within this new version will take precedence and a proposed revision of Appendix 16 will be considered. This clarification is already included in Section 3.6 Understanding and Expectations (Page 401-402) and Section 5.0, Assessment Methodologies (Page 404).

The CE notes the technical issues raised in the submissions. These relate in general to the parent documents and overlapping standards. It is to be expected that there will be a degree of tolerance in the metrics described until a standardised methodology can be derived post publication of BR.209 3rd Edition. It is not possible for the Development Plan to attempt to reconcile any or all perceived discrepancies in these separate guidance documents. Section 4.0 (Page 402) highlights that where the text of the Development Plan is unclear or where there is ambiguity over a particular piece of information, the relevant standard and guidance document shall always take precedence. However, on foot of the some of the issues raised of a technical nature, it is considered appropriate to further amend Appendix 16 to introduce greater clarity to address the concerns raised.

The purpose of Appendix 16 is to act as a guide to ensure a generally consistent approach to completing daylight and sunlight assessments in the city. Appendix 16 does not attempt to outline precise, citywide, expected results or a suite of results that are likely to be considered acceptable by the planning authority. Proposals will continue to be assessed on a case-by-case basis depending on site specific circumstances and location. As best practice, it is recommended that designers continue to participate in a pre-planning process in the early stages of design for detailed technical requirements in advance of a planning application.

Chief Executive's Recommendation

Appendix 16 Section 3.5 National Policy Page 401

Amendment:

3.5 National Policy

Beyond guidance given in the Dublin City Development Plan 2022 – 2028, direction and information on daylight and sunlight is given within the Urban Development and Building Height Guidelines for Planning Authorities (2018) and the Sustainable Urban Housing: Design Standards for New Apartments (December 2020). Both documents refer to BR209 and BS 8206-2. Neither document refers to BS EN 17037 or IS EN 17037.

{For clarity, appropriate and reasonable regard should be taken of government policies, including the Urban Development and Building Height Guidelines for Planning Authorities (2018) and the Sustainable Urban Housing: Design Standards for New Apartments (December 2020), in the completion of sunlight and daylight assessments.}

Appendix 16

4.0 Relevant Metrics

Insert new subsection after subsection 4.6, on page 404.

Amendment:

{4.7 Vertical Sky Component (VSC – skylight metric)}

The Vertical Sky Component is defined in BR 209 as the “Ratio of that part of illuminance, at a point on a given vertical plane, that is received directly from a Commission Internationale de l'Eclairage (CIE) standard overcast sky, to illuminance on a horizontal plane due to an unobstructed hemisphere of this sky”.}

Appendix 16

5.0 Assessment Methodologies

Pages 404, 405, 406

Sections 5.1, 5.2 and 5.3.

Amendment:

5.1 Performance of the Proposed Development

- Annual Probable Sunlight Hours on all {relevant} windows
- Winter Sunlight Hours on all {relevant} windows
- Sunlight on Ground in all amenity spaces
- Average Daylight Factor in all habitable rooms
- No Sky Line in all habitable rooms
- Target Illuminance in all habitable rooms

5.2 Impact on the Surrounding Properties

- Vertical Sky Component on all {relevant} surrounding windows
- Annual Probable Sunlight Hours on all {relevant} surrounding windows
- Winter Sunlight Hours on all {surrounding} windows
- Sunlight on Ground in all surrounding amenity spaces

5.3 Other Criteria and Considerations

In addition to the above metrics, the planning authority ~~(notes the points below for clarity)~~ {will require consideration of the points below, save in agreed exceptional circumstances:}

When assessing the impact of a proposed development, it is expected that all surrounding properties are assessed. It is not acceptable to assess only the surrounding residential properties. Residential properties should be clearly marked out and results for these presented separately.

When assessing the impact of a proposed development on the existing surrounding properties, it is expected that the rule within clause 2.2.4 of BR 209 is applied. This rule outlines that “Loss of light to existing windows need not be analysed if the distance of each part of the new development from the existing window is three or more times its height above the centre of the

existing window". Thus, all surrounding buildings that sit within three times the height of the proposed development shall be included within the assessment. **{The assessment can then use methods typically applied in BR 209 to determine the correct approach to investigating loss of light.}**

When analysing the results found to investigate the impact of a proposed development on the surrounding existing buildings, it is expected that the nomenclature and associated descriptions from within Appendix I of BR 209 are used. The wordings of negligible, minor adverse, moderate adverse and major adverse have defined meanings. These meanings have associated descriptors, and these shall be applied during the analytics section of reports. Appendix I in BR 209 provides these descriptions in full.

The use of average daylight factor in assessing the impact of a new development on surrounding existing developments is not permitted.

Where alternate target values are being set, this shall be completed in line with Appendix F of BR 209.

When analysing the performance of a proposed development, it is expected that all rooms with an expectation for daylight are assessed. Assessing only a sample of rooms is not permitted.

When determining input factors for simulations, ~~**(the criteria below shall be applied. Deviations from these values shall not be accepted.)**~~ **{applicants shall clearly state their assumptions.}**

~~**(Table 1: Input Parameters**~~

| Input Parameter | Value |
|--|--------------------------|
| Internal floor reflectance | 20 % |
| Internal wall reflectance | 50 % |
| Internal ceiling reflectance | 70 % |
| External material reflectance | 20 % |
| Glazing Transmission | 70 % |
| Glazing Maintenance Factor | 88 % |
| Framing Factor | 95 % |
| Grid Height above ground (Residential) | 0.85 m |
| Grid Height above ground (Commercial) | 0.70 m |

Appendix 17

Advertising and Signage Strategy

Summary

A number of submissions raise general issues with respect to Appendix 17: Advertising and Signage Strategy. The submissions state that the advertising strategy as drafted is outdated and fails to take account of the recent emergence of digital displays for advertising, in particular in relation to bus shelters and phone boxes. A request is made that the Draft Plan should include an outright prohibition on all outdoor advertising in ACA's and Conservation Areas.

Further issues raised are that the Plan should not allow any large billboard advertising to be permitted, that the council actively seek the reduction of existing signs and that alternative uses be considered for advertising locations, such as for use as civic information boards or green walls. It is stated that advertisement structures in villages and neighbourhoods can be significantly out of scale and excessively intrusive in an area, as well as out of sync with the aesthetics of historical areas. It is also requested that no advertising material be permitted on telecommunications boxes.

One submission states that the advertising strategy as drafted is inconsistent in the treatment of advertising proposals on zoned land versus on un-zoned land, such as roads infrastructure. This has led to situations where the development of advertising structures in the public realm appears to have been primarily assessed by reference to the Outdoor Advertising Strategy rather than adjoining zoning objectives. This places retailers at a competitive disadvantage, for example in the development of advertising panels mounted on facades and/or gable ends of properties.

Amendments to the Draft Plan are sought to remove requirements for the removal of existing advertising when seeking to upgrade and/or replace existing outdoor advertising. Amendments are also sought regarding mapping for zones of advertising control as it is believed the map is unclear and inconsistent in the allocation of advertising control zones.

Chief Executive's Response

The Draft Plan sets out the strategic approach to the regulation of advertising at Chapter 7, City Centre, Urban Villages and Retail, Section 7.5.9 Outdoor Advertising Strategy (Page 267). Policy CCUV44 clarifies that advertising structures are primarily considered with reference to zoning objectives. Detailed guidance is provided at Appendix 17, Advertising and Signage Strategy (Page 417).

The draft Advertising and Signage Strategy is based on geographical control zones. These zones cover all parts of the city, ranging from areas of high architectural, historical and cultural sensitivity, to residential areas, to areas of less sensitivity. Based on these zones, a range of controls and policies have been developed for each zone ranging from the prohibition of outdoor advertising in the most sensitive areas, to more general controls in less sensitive areas where certain types of advertising will be considered.

The Draft Plan represents a practical and balanced approach to manage and appropriately respond to all proposals for outdoor advertising, based on the sensitivity of different parts of the city to such development. It is an overarching aim of the strategy to rationalise the overall level of advertising in the city. Specifically, any new applications for outdoor advertising structures will generally require the removal of existing advertising panels to rationalise the location and

concentration of existing advertising structures. Alternative uses of former advertising sites can also be considered in a planning application.

In relation to billboards, the strategy provides that such advertising panels will no longer be permitted. In relation to protection for ACA's and Conservation Areas, the CE notes that the draft strategy places a deliberate and clear emphasis on the protection of these locations, both through the zonal based management of proposals and through Section 8.0, Advertising Development Management Standards. These measures are in addition to existing protections afforded through land use zoning objectives and statutory ACA plans which also must be taken into account. Given the protection given to these sensitive areas, a blanket prohibition on outdoor advertising is considered excessive and could be counter-productive in terms of securing the removal and rationalisation of existing outdated and unsightly outdoor advertising in these areas.

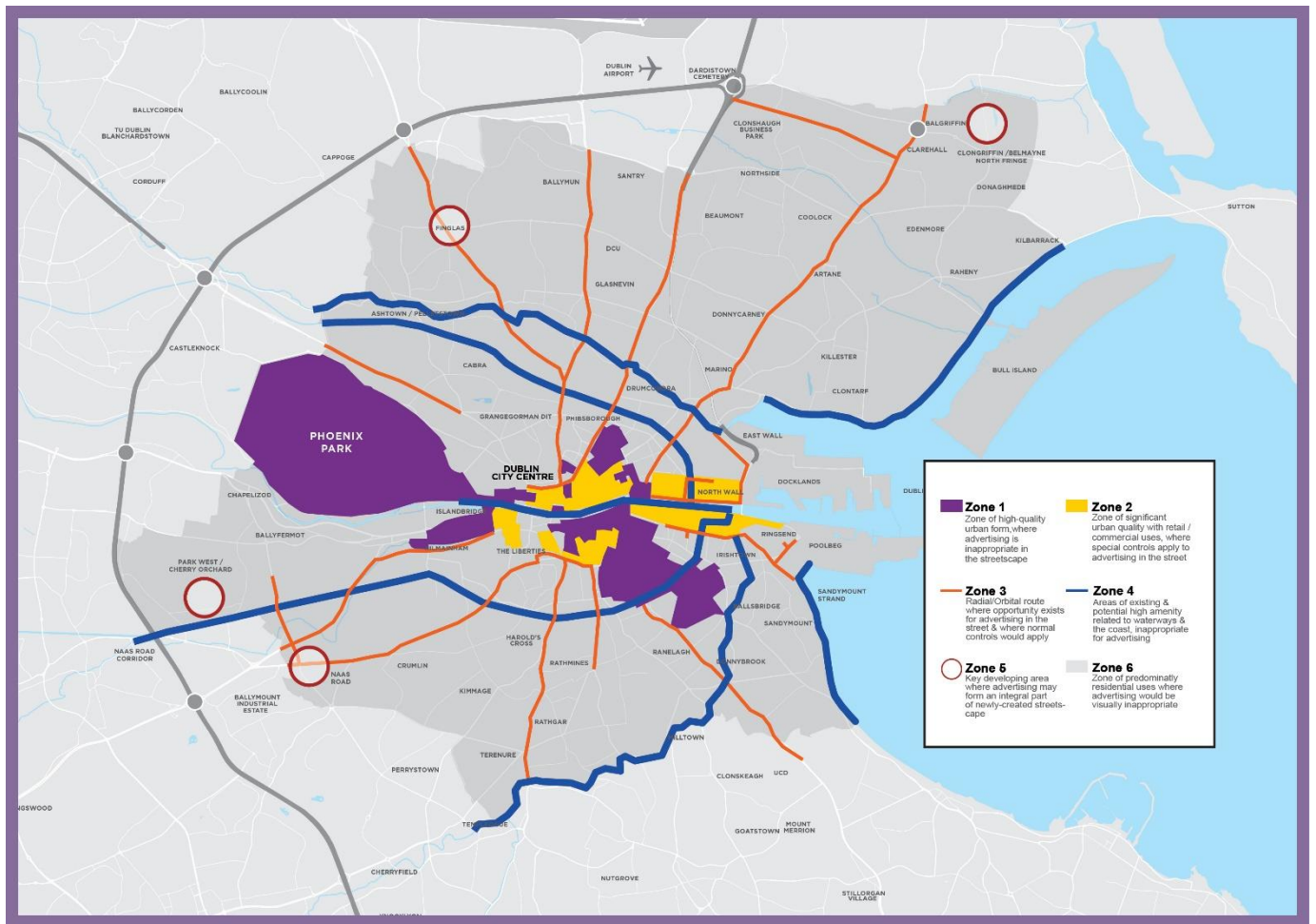
The CE does not accept that the draft advertising strategy fails to take account of the recent emergence of digital displays for advertising. The draft strategy is an iterative development of previous advertising policy and as such, has been updated to reflect emerging trends in the development of outdoor digital advertising. Section 2.0, Digital Signage (Page 422) is now included to control the design and location of such structures. Section 5.0, Advertising on Bus Shelters/Phone Boxes (Page 424) is included to regulate such advertising in the city and to protect sensitive locations, including conservation areas and residential conservation areas, from adverse impacts.

The CE notes the comments made in relation to competitive disadvantage. While commercial viability is a key consideration, this has to be balanced with the need to create a high-quality public domain and to safeguard and enhance sensitive areas and sites.

The comments made regarding the clarity of mapping at Figure 1: Zones of Advertising Control (Page 420) are noted and will be addressed prior to final plan production.

Chief Executive's Recommendation

No change proposed to Draft Plan text as existing text satisfactorily responds to the issues raised.



Volume 3 - Zoning Maps

Volume 3: Zoning Maps

Submission Number(s):

0001, 0002, 0004, 0007, 0008, 0009, 0011, 0012, 0013, 0014, 0016, 0017, 0018, 0019, 0020, 0021, 0022, 0023, 0024, 0025, 0026, 0027, 0028, 0029, 0030, 0031, 0032, 0033, 0034, 0035, 0036, 0037, 0038, 0039, 0040, 0041, 0042, 0043, 0044, 0045, 0046, 0047, 0048, 0049, 0050, 0051, 0052, 0053, 0054, 0055, 0056, 0057, 0058, 0059, 0060, 0061, 0062, 0063, 0064, 0065, 0066, 0067, 0068, 0070, 0071, 0072, 0073, 0074, 0075, 0076, 0077, 0078, 0079, 0080, 0081, 0082, 0083, 0084, 0085, 0086, 0087, 0088, 0090, 0091, 0092, 0093, 0094, 0095, 0096, 0097, 0098, 0099, 0100, 0101, 0102, 0103, 0104, 0105, 0106, 0107, 0108, 0109, 0110, 0111, 0112, 0113, 0114, 0116, 0117, 0118, 0119, 0120, 0121, 0122, 0123, 0124, 0125, 0126, 0127, 0128, 0129, 0130, 0131, 0132, 0133, 0134, 0135, 0136, 0137, 0138, 0139, 0140, 0141, 0142, 0143, 0144, 0145, 0146, 0147, 0148, 0149, 0150, 0151, 0152, 0153, 0154, 0155, 0156, 0157, 0158, 0159, 0160, 0161, 0162, 0163, 0164, 0165, 0166, 0167, 0168, 0169, 0170, 0171, 0172, 0173, 0174, 0175, 0176, 0177, 0178, 0179, 0180, 0181, 0182, 0183, 0184, 0185, 0186, 0187, 0188, 0189, 0190, 0191, 0192, 0193, 0194, 0195, 0196, 0197, 0198, 0199, 0200, 0201, 0202, 0203, 0204, 0205, 0206, 0207, 0208, 0209, 0210, 0211, 0212, 0213, 0214, 0215, 0216, 0217, 0218, 0219, 0220, 0221, 0222, 0223, 0224, 0225, 0226, 0227, 0228, 0229, 0230, 0231, 0232, 0233, 0234, 0235, 0236, 0237, 0238, 0239, 0240, 0241, 0242, 0243, 0244, 0245, 0246, 0247, 0248, 0249, 0250, 0251, 0252, 0254, 0255, 0256, 0257, 0258, 0259, 0260, 0261, 0262, 0263, 0264, 0265, 0266, 0267, 0268, 0269, 0270, 0271, 0273, 0274, 0275, 0276, 0277, 0278, 0279, 0280, 0281, 0282, 0283, 0284, 0285, 0286, 0287, 0288, 0289, 0290, 0291, 0292, 0293, 0294, 0295, 0296, 0297, 0298, 0299, 0300, 0301, 0302, 0303, 0304, 0305, 0306, 0307, 0308, 0309, 0310, 0311, 0312, 0314, 0316, 0317, 0318, 0319, 0320, 0321, 0322, 0323, 0324, 0325, 0326, 0327, 0329, 0330, 0331, 0332, 0334, 0335, 0336, 0341, 0342, 0345, 0346, 0348, 0351, 0352, 0354, 0355, 0356, 0357, 0358, 0359, 0360, 0361, 0363, 0364, 0365, 0366, 0367, 0368, 0369, 0370, 0371, 0373, 0374, 0375, 0376, 0377, 0378, 0381, 0382, 0383, 0384, 0385, 0386, 0387, 0388, 0389, 0393, 0394, 0395, 0396, 0397, 0398, 0399, 0400, 0401, 0402, 0403, 0404, 0405, 0407, 0409, 0410, 0411, 0414, 0415, 0416, 0417, 0418, 0419, 0420, 0421, 0422, 0423, 0424, 0425, 0426, 0427, 0428, 0429, 0430, 0431, 0432, 0433, 0435, 0436, 0437, 0438, 0439, 0440, 0441, 0442, 0443, 0444, 0445, 0446, 0447, 0448, 0449, 0450, 0452, 0456, 0457, 0458, 0460, 0461, 0462, 0463, 0464, 0466, 0467, 0468, 0469, 0470, 0471, 0472, 0473, 0474, 0475, 0476, 0477, 0478, 0479, 0480, 0481, 0482, 0483, 0484, 0485, 0486, 0487, 0488, 0489, 0490, 0491, 0492, 0493, 0494, 0495, 0496, 0497, 0500, 0501, 0502, 0503, 0504, 0505, 0506, 0507, 0508, 0509, 0510, 0511, 0513, 0514, 0515, 0516, 0517, 0518, 0519, 0520, 0521, 0522, 0523, 0524, 0525, 0526, 0527, 0528, 0529, 0530, 0531, 0532, 0533, 0534, 0535, 0536, 0537, 0538, 0539, 0540, 0541, 0542, 0543, 0544, 0545, 0546, 0548, 0549, 0550, 0551, 0552, 0554, 0555, 0556, 0557, 0558, 0559, 0560, 0561, 0562, 0563, 0564, 0565, 0566, 0567, 0568, 0569, 0570, 0571, 0572, 0573, 0574, 0575, 0576, 0578, 0579, 0581, 0582, 0583, 0584, 0585, 0586, 0587, 0588, 0591, 0592, 0593, 0595, 0596, 0597, 0598, 0599, 0600, 0602, 0603, 0604, 0607, 0608, 0609, 0610, 0611, 0612, 0613, 0614, 0615, 0616, 0617, 0618, 0619, 0620, 0621, 0622, 0623, 0624, 0625, 0627, 0628, 0629, 0630, 0631, 0633, 0634, 0635, 0638, 0639, 0640, 0641, 0642, 0643, 0644, 0645, 0646, 0647, 0649, 0650, 0651, 0652, 0654, 0655, 0660, 0661, 0662, 0663, 0664, 0665, 0666, 0667, 0668, 0669, 0670, 0671, 0672, 0673, 0674, 0675, 0676, 0677, 0678, 0679, 0680, 0681, 0682, 0683, 0684, 0685, 0686, 0687, 0688, 0689, 0691, 0694, 0695, 0696, 0697, 0699, 0700, 0702, 0703, 0704, 0705, 0706, 0707, 0708, 0709, 0710, 0711, 0712, 0713, 0714, 0715, 0716, 0717, 0719, 0720, 0721, 0724, 0725, 0730, 0731, 0732, 0733, 0734, 0735, 0736, 0737, 0738, 0741, 0743, 0744, 0745, 0751, 0752, 0753, 0754, 0756, 0757, 0758, 0762, 0763, 0764, 0765, 0767, 0768, 0769, 0770, 0771, 0772, 0775, 0776, 0777, 0778, 0779, 0780, 0781, 0782, 0783, 0785, 0786, 0787, 0789, 0790, 0791, 0792, 0793, 0794, 0795, 0796, 0797, 0798, 0799, 0802, 0803, 0804, 0806, 0808, 0809, 0810, 0811, 0812, 0813, 0814, 0815, 0816, 0817, 0818,

0819, 0820, 0821, 0822, 0825, 0826, 0827, 0828, 0831, 0833, 0835, 0837, 0838, 0839, 0840,
0841, 0842, 0843, 0844, 0845, 0847, 0848, 0849, 0850, 0851, 0852, 0853, 0854, 0855, 0856,
0857, 0858, 0859, 0860, 0861, 0862, 0863, 0864, 0865, 0866, 0867, 0868, 0869, 0870, 0871,
0872, 0873, 0875, 0876, 0877, 0878, 0879, 0880, 0881, 0882, 0883, 0884, 0885, 0887, 0891,
0892, 0893, 0894, 0897, 0898, 0899, 0900, 0901, 0902, 0903, 0904, 0905, 0907, 0908, 0910,
0911, 0912, 0913, 0914, 0915, 0916, 0917, 0918, 0919, 0920, 0921, 0922, 0927, 0930, 0932,
0934, 0935, 0936, 0937, 0938, 0941, 0942, 0943, 0945, 0951, 0952, 0954, 0955, 0956, 0957,
0958, 0959, 0960, 0961, 0962, 0963, 0965, 0966, 0967, 0968, 0972, 0974, 0975, 0976, 0977,
0978, 0981, 0983, 0984, 0985, 0986, 0987, 0988, 0989, 0990, 0991, 0992, 0993, 0994, 0995,
0996, 0997, 0998, 0999, 1000, 1001, 1002, 1005, 1008, 1009, 1013, 1014, 1016, 1017, 1020,
1024, 1025, 1026, 1028, 1031, 1032, 1034, 1036, 1039, 1040, 1041, 1043, 1044, 1047, 1050,
1052, 1054, 1057, 1058, 1059, 1060, 1062, 1065, 1066, 1067, 1069, 1070, 1071, 1072, 1073,
1075, 1078, 1079, 1080, 1091, 1092, 1097, 1099, 1100, 1101, 1102, 1103, 1104, 1105, 1106,
1107, 1108, 1110, 1111, 1112, 1113, 1114, 1116, 1117, 1118, 1119, 1120, 1124, 1125, 1126,
1127, 1128, 1129, 1131, 1132, 1133, 1135, 1136, 1137, 1138, 1139, 1140, 1141, 1142, 1143,
1144, 1145, 1146, 1151, 1152, 1154, 1159, 1160, 1161, 1162, 1164, 1165, 1166, 1168, 1169,
1171, 1172, 1173, 1174, 1175, 1177, 1178, 1179, 1180, 1181, 1182, 1183, 1184, 1185, 1186,
1188, 1189, 1195, 1196, 1198, 1199, 1200, 1202, 1203, 1205, 1206, 1208, 1209, 1210, 1211,
1213, 1214, 1215, 1216, 1217, 1218, 1219, 1220, 1221, 1223, 1224, 1225, 1227, 1228, 1229,
1231, 1232, 1233, 1234, 1235, 1237, 1239, 1240, 1241, 1242, 1243, 1244, 1246, 1247, 1248,
1250, 1251, 1252, 1253, 1254, 1255, 1256, 1257, 1259, 1260, 1261, 1262, 1265, 1267, 1269,
1270, 1273, 1274, 1276, 1277, 1280, 1282, 1284, 1285, 1286, 1287, 1289, 1290, 1291, 1292,
1293, 1294, 1295, 1296, 1297, 1298, 1299, 1301, 1303, 1308, 1310, 1311, 1312, 1313, 1314,
1315, 1316, 1317, 1319, 1322, 1323, 1324, 1325, 1326, 1328, 1329, 1330, 1331, 1332, 1333,
1334, 1335, 1336, 1339, 1340, 1342, 1344, 1345, 1346, 1348, 1349, 1351, 1352, 1354, 1355,
1356, 1357, 1360, 1361, 1362, 1364, 1365, 1366, 1367, 1368, 1369, 1370, 1371, 1372, 1373,
1374, 1375, 1376, 1379, 1381, 1383, 1384, 1386, 1388, 1391, 1392, 1393, 1394, 1396, 1399,
1400, 1401, 1403, 1405, 1406, 1409, 1410, 1411, 1412, 1414, 1415, 1416, 1417, 1418, 1419,
1421, 1422, 1423, 1424, 1425, 1426, 1428, 1429, 1430, 1431, 1432, 1433, 1434, 1435, 1437,
1438, 1439, 1441, 1443, 1446, 1448, 1451, 1455, 1456, 1457, 1460, 1471, 1475, 1476, 1478,
1482, 1483, 1484, 1486, 1487, 1489, 1490, 1491, 1494, 1498, 1499, 1500, 1502, 1505, 1506,
1507, 1510, 1512, 1513, 1514, 1515, 1517, 1518, 1519, 1520, 1522, 1524, 1525, 1526, 1528,
1533, 1534, 1535, 1537, 1539, 1542, 1544, 1546, 1547, 1548, 1549, 1551, 1552, 1553, 1558,
1559, 1560, 1561, 1565, 1566, 1567, 1569, 1570, 1573, 1575, 1576, 1579, 1581, 1582, 1589,
1591, 1596, 1597, 1601, 1602, 1606, 1609, 1611, 1613, 1615, 1616, 1622, 1623, 1627, 1628,
1631, 1632, 1633, 1634, 1637, 1638, 1640, 1641, 1642, 1643, 1647, 1648, 1649, 1650, 1652,
1653, 1654, 1657, 1658, 1661, 1664, 1669, 1670, 1679, 1682, 1683, 1684, 1686, 1690, 1691,
1693, 1695, 1707, 1710, 1711, 1712, 1714, 1715, 1718, 1719, 1720, 1724, 1726, 1727, 1728,
1731, 1735, 1736, 1738, 1739, 1744, 1745, 1749, 1757, 1758, 1762, 1766, 1772, 1774, 1779,
1780, 1781, 1782, 1784, 1785, 1792, 1794, 1796, 1798, 1806, 1808, 1811, 1822, 1827, 1830,
1831, 1836, 1840, 1843, 1846, 1847, 1848, 1849, 1856, 1863, 1867, 1869, 1870, 1872, 1873,
1877, 1879, 1880, 1883, 1888, 1889, 1890, 1891, 1893, 1894, 1895, 1896, 1897, 1898, 1899,
1900, 1901, 1902, 1903, 1904, 1905, 1906, 1907, 1908, 1909, 1910, 1911, 1912, 1913, 1914,
1915, 1916, 1917, 1918, 1919, 1920, 1921, 1922, 1923, 1924, 1925, 1926, 1927, 1928, 1929,
1930, 1931, 1932, 1933, 1934, 1935, 1936, 1937, 1938, 1939, 1940, 1941, 1942, 1943, 1944,
1945, 1949, 1950, 1951, 1952, 1953, 1954, 1955, 1956, 1957, 1958, 1959, 1962, 1963, 1964,
1965, 1966, 1967, 1968, 1969, 1970, 1974, 1975, 1976, 1977, 1978, 1979, 1980, 1981, 1982,
1983, 1984, 1985, 1986, 1987, 1988, 1989, 1990, 1991, 1992, 1993, 1994, 1995, 1996, 1997,
1998, 1999, 2000, 2001, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013,
2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028,
2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043,
2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2057, 2058, 2059,

2060, 2061, 2062, 2064, 2065, 2066, 2067, 2068, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2088, 2089, 2090, 2091, 2092, 2093, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2104, 2107, 2108, 2111, 2113, 2118, 2121, 2123, 2129, 2132, 2133, 2134, 2137

A summary table and report for each site where a rezoning was requested is set out below. For ease of reference, where the CE has recommended a change in the zoning of a site, this is highlighted on the table in a pale green shading.

Map A

| Site Address | Draft Plan Zoning | Requested Zoning | CE Recommendation | Map Sheet | Map Reference |
|---|-------------------|------------------|-------------------|-----------|---------------|
| Dublin Industrial Estate | Z6 | Z14/ Z10/ Z1 | Z6 | Map A | A-0001 |
| Patrickswell Court, Finglas, Dublin 11 | Z9 | Z1 | Z1 | Map A | A-0002 |
| McElvaney Motors Ltd., North Road, Charlestown, Finglas, Dublin 11 | Z6 | Z4 | Z6 | Map A | A-0003 |
| Circle K, Finglas North Road, Dublin 11 | Z6 | Z3 | Z6 | Map A | A-0004 |
| Jamestown Road, Mouldpro Site, Poppintree Industrial Estate, Dublin 11 | Z6 | Z14 | Z6 | Map A | A-0005 |
| Tolka Valley Business Park, Ballyboggan, Dublin 11 | Z6 | Z10 | Z6 | Map A | A-0006 |
| St. Margaret's Road, Finglas | Z14 | Z6 | Z14 | Map A | A-0007 |
| Church of the Annunciation, Finglas West, Dublin 11 | Z15 | Z12 | Z1 | Map A | A-0008 |
| St. Finian's Oratory, Glenties Park | Z15 | Z12 | Z15 | Map A | A-0009 |
| St. Canice's, Main Street, Finglas Village, Dublin 11 | Z15 | Z12 | Z15 | Map A | A-0010 |
| Mother of Divine Grace PS, Ferndale Avenue Ballygall, Dublin 11 | Z15 | Z12 | Z15 | Map A | A-0011 |
| Sacred Heart Boys NS, St. Canace's Road, Ballygall, Dublin 11 | Z15 | Z12 | Z15 | Map A | A-0012 |
| Casa Caterina Special School, Dominican Campus, Ratoath Road, Cabra, Dublin 7 | Z15 | Z12 | Z15 | Map A | A-0013 |
| St. Canice's Boys NS, Glasanaon Road, Finglas, Dublin 11 | Z15 | Z12 | Z15 | Map A | A-0014 |

| | | | | | |
|--|-----|-----|-----|-------|--------|
| St. Canice's Girls NS, Seamus Ennis Road, Finglas, Dublin 11 | Z15 | Z12 | Z15 | Map A | A-0015 |
| St. Brigid's Infant School, Wellmount Avenue, Finglas, West, Dublin 11 | Z15 | Z12 | Z15 | Map A | A-0016 |
| St. Brigid's Senior Girls S, Wellmount Avenue, Finglas West Dublin 11 | Z15 | Z12 | Z15 | Map A | A-0016 |
| St. Fergal's Boys NS, Cappagh Road, Finglas West, Dublin 11 | Z15 | Z12 | Z15 | Map A | A-0018 |
| St. Joseph's Girls NS, Barry Avenue, Finglas West, Dublin 11 | Z15 | Z12 | Z15 | Map A | A-0019 |
| St. Kevins Boys NS, Barry Avnue, Finglas West, Dublin 11 | Z15 | Z12 | Z15 | Map A | A-0020 |
| Jamestown Road Lands, Finglas | Z14 | Z6 | Z14 | Map A | A-0021 |

Map Reference: A-0001

Site Address: Dublin Industrial Estate

Draft Plan Zoning: Z6

Requested Zoning: Z10/Z14/ Z1

CE Recommended Zoning: Z6

Summary

A submission was made seeking the rezoning of Dublin Industrial Estate from Z6 Employment/Enterprise to Z10 Inner Suburban and Inner City Sustainable Mixed-Uses or designated as a SDRA and zoned Z14 Strategic Development and Regeneration Areas (SDRAs) to obviate the necessity of a variation of the development plan to facilitate residential development on these lands and to be consistent with the Z14 zoning and SDRA designation of the Kylemore Road/Naas Road lands.

Another submission was made seeking the rezoning of Dublin Industrial Estate for residential development as the lands are underused.

Chief Executive's Response

The Draft Plan supports the future development of Glasnevin (the Dublin Industrial Estate and surrounding lands) as set out in Section 2.3.5 page 69 of the Draft Plan. It is the intent of the Council that, following feasibility studies and/ or the preparation of a Local Area Plan (or other appropriate plan), that these industrial lands will be brought forward as regeneration lands during the lifetime of the development plan. Any feasibility carried out on these lands over the course of the development plan period will include a service capacity investment audit detailing infrastructural requirements to enable the quality mixed use intensification of the area given its locational proximity to existing public transport corridors.

Objective CSO1 of the Draft Plan states that it is an objective of the City Council: To prepare a feasibility study and a local statutory plan for the Z6 zoned lands at Glasnevin (Dublin Industrial Estate and environs) in consultation with the relevant stakeholders, including an infrastructural audit with costings and implementation strategy to enable sustainable regeneration and development and curtail piecemeal development.

As such it is considered that the rezoning of the lands is premature pending the feasibility study being carried out for the future development of the subject lands in accordance with Objective CSO1.

Chief Executive's Recommendation

Retain Z6 zoning.

Map Reference: A-0002

Site Address: Patrickswell Court, Finglas, Dublin 11

Draft Plan Zoning: Z9

Requested Zoning: Z1

CE Recommended Zoning: Z1

Summary

A submission was made seeking the rezoning of lands at Patrickswell Court, Finglas, Dublin 11 from Z9 to Z1. The rationale provided in the submission for the rezoning is that the 0.0225ha lands are left over, unused, poorly orientated and sized and marginal without any intrinsic quality for use other than as a residential property. The submission states that the current owner purchased the site in 2020, fenced off access through the site and planning permission for a two storey detached house was refused under reg. ref. 2350/21 in May 2021 as the proposed development would contravene materially the Z9 zoning objective development objective and be contrary to the proper planning and sustainable development of the area.

The submission states that the lands do not form part of any wider area of public open space, are not part of a network of public open spaces, are not permeable, and is a recently purchased privately owned site. The submission requests that that the subject lands be zoned Z1 to allow for the development of one house on the site as it is stated this would be the most appropriate way of dealing with this piece of left over land and would be consistent with the proper planning and sustainable development of the area.

Chief Executive's Response

The small site of c. 0.0225ha is located between the southern side garden boundary of no. 1 Patrickswell Court and the rear garden boundaries of nos. 17-20 Wellmount Parade. The site is located in the established residential area of Patrickswell Court and according to the planner's report under reg. ref. 2350/21, the site was in use informally as a community garden. It is considered that the rezoning of this site from Z9 to Z1 would allow for a small infill residential development on this site in private ownership where the wider area is well served by extensive open space and is in close proximity to Finglas Village, with good public transport links.

Chief Executive's Recommendation

It is recommended to rezone the site from Z9 to Z1.

Map Reference: A-0003

Site Address: McElvaney Motors Ltd., North Road, Charlestown, Finglas, Dublin 11

Draft Plan Zoning: Z6

Requested Zoning: Z4

CE Recommended Zoning: Z6

Summary

A submission was made seeking the rezoning of the c. 1.2 ha lands at McElvaney Motors Ltd., North Road, Charlestown, Finglas, Dublin 11 from Z6 to Z4 as the Z4 zoning would permit a significantly wider and more appropriate range of land uses on these highly accessible lands adjoining an area with a growing residential population. It is stated that the Z4 zoning would better reflect the site's location within the urban block containing the existing Charlestown Shopping Centre. The boundary between Dublin City Council and Fingal County Council runs through the site and the portion of the site within Fingal County Council is zoned GE - General Employment.

Chief Executive's Response

On foot of objective CEE04 of the current Dublin City Development Plan 2016, a detailed review of all Z6 zoned lands in the city was undertaken with a view to determining which lands had redevelopment potential and would be suitable for a change in zoning to facilitate more compact growth. This resulted in a series of variations to the current plan, where a number of Z6 lands were rezoned to Z1 and Z10. As part of the preparation of the Draft Plan, a further review was undertaken of Z6 lands and further sites recommended for a change in zoning due to the fact that they were no longer considered optimal locations for intensive employment use. Further Z6 sites have also been recommended for a change in zoning under this CE report.

The CE considers that the remaining Z6 land bank represents the core strategic employment lands in the city. Such lands are an important asset for the city and provide an important local employment function. Many accord with the Strategic Employment Areas identified under MASP. A wide range of employment uses are permitted and open for consideration under the zoning objective.

The CE recommends, therefore, to retain the Z6 zoning of the site.

Chief Executive's Recommendation

Retain Z6 zoning.

Map Reference: A-0004

Site Address: Circle K, Finglas service station, North Road, Finglas North, Dublin 11

Draft Plan Zoning: Z6

Requested Zoning: Z3

CE Recommended Zoning: Z6

Summary

A submission was made seeking the rezoning of the c. 0.19ha Circle K Finglas service station site at North Road, Finglas North, Dublin 11 from Z6 to Z3 as the Z6 zoning objective pertaining to the site poses a risk to the operation of the service station and could damage its future development prospects and also does not reflect or properly account for the established and permitted commercial use of the site. The submission states that the proposed Z3 zoning would be more appropriate to this service station site which is located in close proximity to existing residential populations and would properly reflect its current commercial use which has been insitu for an extended period of time.

Chief Executive's Response

On foot of objective CEE04 of the current Dublin City Development Plan 2016, a detailed review of all Z6 zoned lands in the city was undertaken with a view to determining which lands had redevelopment potential and would be suitable for a change in zoning to facilitate more compact growth. This resulted in a series of variations to the current plan, where a number of Z6 lands were rezoned to Z1 and Z10. As part of the preparation of the Draft Plan, a further review was undertaken of Z6 lands and further sites recommended for a change in zoning due to the fact that they were no longer considered optimal locations for intensive employment use. Further Z6 sites have also been recommended for a change in zoning under this CE report.

The CE considers that the remaining Z6 land bank represents the core strategic employment lands in the city. Such lands are an important asset for the city and provide an important local employment function. Many accord with the Strategic Employment Areas identified under MASP. A wide range of employment uses are permitted and open for consideration under the zoning objective.

The CE recommends, therefore, to retain the Z6 zoning of the site. It is considered that the Z6 zoning would not preclude the ongoing operations of the site as a service station.

Chief Executive's Recommendation

Retain Z6 zoning.

Map Reference: A-0005

Site Address: Jamestown Road former Mouldpro Site, adjacent Poppintree Industrial Estate, Jamestown Road, Finglas, Dublin 11

Draft Plan Zoning: Z6

Requested Zoning: Z14

CE Recommended Zoning: Z6

Summary

A submission was made seeking the rezoning of the c. 4.1 ha former Mouldpro Site, Jamestown Road, adjacent Poppintree Industrial Estate, Finglas, Dublin 11 from Z6 to Z14 on the basis of its vacant brownfield condition, site planning history, accessibility, access to public transport and social infrastructure, proximity to an established residential area and lack of demand for intensive employment generating uses in the area. The submission states that the proposed rezoning from Z6 to Z14 would facilitate a more appropriate use for this site and encourage the development of much needed residential accommodation and employment uses at this location.

Chief Executive's Response

On foot of objective CEE04 of the current Dublin City Development Plan 2016, a detailed review of all Z6 zoned lands in the city was undertaken with a view to determining which lands had redevelopment potential and would be suitable for a change in zoning to facilitate more compact growth. This resulted in a series of variations to the current plan, where a number of Z6 lands were rezoned to Z1 and Z10. As part of the preparation of the Draft Plan, a further review was undertaken of Z6 lands and further sites recommended for a change in zoning due to the fact that they were no longer considered optimal locations for intensive employment use. Further Z6 sites have also been recommended for a change in zoning under this CE report.

The CE considers that the remaining Z6 land bank represents the core strategic employment lands in the city. Such lands are an important asset for the city and provide an important local employment function. Many accord with the Strategic Employment Areas identified under MASP. A wide range of employment uses are permitted and open for consideration under the zoning objective.

The CE recommends, therefore, to retain the Z6 zoning of the site.

Chief Executive's Recommendation

Retain Z6 zoning.

Map Reference: A-0006

Site Address: Tolka Industrial Park and Tolka Valley Business Park, Ballyboggan Road, Dublin 11

Draft Plan Zoning: Z6

Requested Zoning: Z10

CE Recommended Zoning: Z6

Summary

A submission was made seeking the rezoning of lands at Tolka Industrial Park and Tolka Valley Business Park, Ballyboggan Road, Dublin 11 from Z6 to Z10 given the accessible and serviced location of the area adjoining high frequency public transport, sustainable and segregated cycle and pedestrian facilities; the significant investment in sustainable transport infrastructure to date and proposed in the short to medium term; the rezoning of the adjoining Ormond Printworks site to Z10; and the area's evolving character (transitioning from a light industrial character to a more mixed-use character). A second submission requests that in the event that the lands at Tolka Industrial Park and Tolka Valley Business Park retain their Z6 Zoning Objective, that modifications are made to Land Use Zoning Objective Z6, specifically the reinstatement of 'Residential' as an Open for Consideration Use on lands zoned Z6, in the forthcoming Dublin City Development Plan 2022-2028.

Chief Executive's Response

On foot of objective CEE04 of the current Dublin City Development Plan 2016, a detailed review of all Z6 zoned lands in the city was undertaken with a view to determining which lands had redevelopment potential and would be suitable for a change in zoning to facilitate more compact growth. This resulted in a series of variations to the current plan, where a number of Z6 lands were rezoned to Z1 and Z10. As part of the preparation of the Draft Plan, a further review was undertaken of Z6 lands and further sites recommended for a change in zoning due to the fact that they were no longer considered optimal locations for intensive employment use. Further Z6 sites have also been recommended for a change in zoning under this CE report.

The CE considers that the remaining Z6 land bank represents the core strategic employment lands in the city. Such lands are an important asset for the city and provide an important local employment function. Many accord with the Strategic Employment Areas identified under MASP. A wide range of employment uses are permitted and open for consideration under the zoning objective.

Objective CSO1 of the Draft Plan states that it is an objective of the City Council: To prepare a feasibility study and a local statutory plan for the Z6 zoned lands at Glasnevin (Dublin Industrial Estate and environs) in consultation with the relevant stakeholders, including an infrastructural audit with costings and implementation strategy to enable sustainable regeneration and development and curtail piecemeal development.

As such it is considered that the rezoning of the lands is premature pending the feasibility study being carried out for the future development of the subject lands in accordance with Objective CSO1.

A response to the request for modifications to Land Use Zoning Objective Z6 is set out in the CE response in relation to Chapter 14. Please refer to for further detail. See also A-0001.

The CE recommends to retain the Z6 zoning of the site.

Chief Executive's Recommendation

Retain Z6 zoning.

Map Reference: A-0007

Site Address: ESB Networks Depot, St. Margaret's Road, Finglas, Dublin 11

Draft Plan Zoning: Z14

Requested Zoning: Z6

CE Recommended Zoning: Z14

Summary

A submission was made by the Electricity Supply Board seeking the rezoning of the ESB Networks Depot, St. Margaret's Road, Finglas from Z14 to Z6 due to the strategic national importance of the site to ESB Networks operations and the delivery of an electricity service in the region of highest demand. The submission states that the proposed Z6 zoning would be consistent with ESB's established and planned use of the site and the land use zoning applied to the bulk of the site within Fingal County Council which is zoned General Enterprise zoning under the Fingal County Development Plan 2017-2023. The submission states that this site should be excluded from consideration under SDRA 3 based on the requirements to store critical high value materials, respond to faults/emergencies within very tight mandatory timelines on a 24/7 basis and the location of strategic national infrastructure at this location.

Chief Executive's Response

Finglas Village and Environs and Jamestown Lands have been designated as a Strategic Development and Regeneration Area (SDRA) and zoned Z14 Strategic Development and Regeneration Areas due to the strategic location of the area, the proposed new public transport network and the extent of available lands suitable for regeneration (Variation No. 33 approved by City Council). The designation of the area as a SDRA seeks to maximise the potential of this well-connected but underutilised brownfield area located adjacent to the proposed Luas green line extension to Finglas, and proposed Finglas Core Bus Corridor. Development principles to guide the development of the SDRA are set out in Chapter 13. It is also noted that public service installations are a permissible use under the Z14 zoning of the site. See also A-0021.

The CE recommends to retain the Z14 zoning of the site to accord with its status as an SDRA.

Chief Executive's Recommendation

Retain Z14 zoning.

Map Reference: A-0008

Site Address: Church of the Annunciation, Finglas West, Dublin 11

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z1

Summary

A submission by the Archdiocese of Dublin seeks the rezoning of this church site from Z15 to Z12 as the submission states that the current Z15 land use zoning unnecessarily restricts consideration of the development potential of the lands, is inappropriate and inconsistent with the long-term future vision for comprehensive regeneration and redevelopment of Dublin City and will represent an under-utilisation of the site in the short, long and medium term. The brownfield site is centrally located within an existing community, strategically located in close proximity to high quality transport provision and local services and has attendant lands which may no longer be needed for the immediate workings of the Diocese in the medium to long term.

The submission requests that the zoning is amended from Z15 to Z12 to allow the Archdiocese of Dublin to protect their current pastoral, community, educational, and religious requirements and obligations, whilst, in some instances, allow them to achieve their objective regarding the delivery of social and affordable housing. The submission states that the Archdiocese of Dublin welcome the use classes associated with the Z12 zoning, which allows more flexibility than the current Draft Z15 zonings across their sites.

Chief Executive's Response

The large Church of the Annunciation building on this site has been demolished and a new church/parish pastoral centre building is under construction on the adjoining site to the north as permitted under planning reg. ref. 3023/19. According to the submission, the planning application on the site identifies, by means of a masterplan, the subject site as a future development zone wherein social and affordable housing could be provided. The site is well located for residential purposes, including social, affordable and/or senior citizens housing and as such Z1 (Sustainable Residential Neighbourhoods) is recommended as the appropriate zoning, close to a local church/parish pastoral centre and schools.

Chief Executive's Recommendation

It is recommended to rezone the site from Z15 to Z1.

Map Reference: A-0009

Site Address: St. Finian's Oratory, Glenties Park

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission was made seeking the rezoning of this site, which includes the school site, from Z15 to Z12. The submission notes that the site is located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

The existing uses on these sites are considered important social and community infrastructure, and having regard to the finite nature of such lands, it is considered appropriate that they are retained for such use. A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the local area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the local area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: A-0010

Site Address: St. Canice's, Main Street, Finglas Village, Dublin 11

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this church site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services in Finglas. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

The site sought for rezoning includes a substantial church structure and car park. The church provides an important religious and community services to the Finglas local area to which it serves. The development potential of the site is considered limited and would likely require demolition of the existing church building or substantial reconfiguration of the site in order to accommodate a meaningful development.

The existing uses on the site are considered important social and community infrastructure, and having regard to the finite nature of such lands, it is considered appropriate that they are retained for such use. The CE is of the view that church buildings such as this one can potentially be utilised for a variety of ecclesiastical and community purposes. In addition, it is noted that Z15 allows consideration for a number of residential institutional uses and assisted living/retirement accommodation. Should the existing church use become unviable or no longer needed by the Diocese, the opportunity remains to seek a variation to the plan in accordance with the provisions of the zoning objective. As such, in the absence of clear development objectives for the site by the Diocese, the rezoning of the site to Z12 would be premature and would result in a potential loss of community amenities and facilities in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: A-0011

Site Address: Mother of Divine Grace PS, Ferndale Avenue, Ballygall, Dublin 11

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Finglas area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: A-0012

Site Address: Sacred Heart Boys NS, St. Canice's Road, Ballygall Dublin 11

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Finglas area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: A-0013

Site Address: Casa Caterina Special School, Dominican Campus, Ratoath Road, Cabra, D. 7

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Cabra/Dublin 7 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: A-0014

Site Address: St. Canice's Boys NS, Glasanaon Road, Finglas, Dublin 11

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Finglas area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: A-0015

Site Address: St. Canice's Girls NS, Seamus Ennis Road, Finglas, Dublin 11

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Finglas area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: A-0016

Site Address: St. Brigid's Infant School, Wellmount Avenue, Finglas West, Dublin 11

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Finglas area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: A-0016

Site Address: St. Brigid's Senior Girls N.S., Wellmount Avenue, Finglas West Dublin 11

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Finglas area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: A-0018

Site Address: St. Fergal's Boys N.S., Cappagh Road, Finglas West, Dublin 11

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Finglas area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: A-0019

Site Address: St. Joseph's Girls NS, Barry Avenue, Finglas West, Dublin 11

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Finglas area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: A-0020

Site Address: St. Kevin's Boys NS, Barry Avenue, Finglas West, Dublin 11

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Finglas area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: A-0021

Site Address: Jamestown Road Lands, Finglas

Draft Plan Zoning: Z14

Requested Zoning: Z6

CE Recommended Zoning: Z14

Summary

A submission stating opposition to the rezoning of the Jamestown Road lands in Finglas from Z6 to Z14 was made on the basis that in the current planning context, private profit will override the needs of the community. The submission states that designating this large site as a Strategic Development and Regeneration Area (SDRA) is a positive move and the provision of high-quality housing, employment opportunities, cultural and recreational spaces and public realm improvements on this site are welcomed. However, it is stated that having regard to other recent developments in the constituency, it seems that any development on this site would be high rise with an over-concentration of small apartments.

The submission notes that a SHD application has been permitted to proceed through the planning process in the absence of the masterplan required for the site and raises concerns that the rezoning was short-sighted and the public consultation for it was not meaningful or robust.

Chief Executive's Response

The rezoning of the Jamestown Road and St. Margaret's Road / McKee Avenue lands in Finglas from Z6 to Z14 and designation of the lands as a new Strategic Development and Regeneration Area was made under Variation No. 33 to the Dublin City Development Plan 2016 - 2022 and adopted by the City Council on Monday 14th June 2021. This followed the statutory requirements for Variation of the Development Plan, including the statutory public consultation requirements.

The rationale for designating the Jamestown lands as a SDRA was:

- To provide for more varied and intense mixed uses for these existing low-density mono use brownfield urban land within the Dublin Metropolitan Area. To support the area regeneration; to deliver a compact and sustainable urban form at this location; to achieve the sustainable use of scarce urban land, and to respond to climate change.
- To maximise the potential of a well-connected but underutilised brownfield low-intensity employment land, situated within the existing built fabric of the City and adjacent to the proposed Luas green line extension to Finglas, and proposed Finglas Core Bus Corridor, as set out in the National and Regional planning objectives in the NPF and RSES / MASP.
- To support the economic revitalisation of Finglas village through the creation of a cohesive urban framework and guiding principles, to ensure that the future development of the lands occurs in a coordinated and sustainable manner that can act as a catalyst to regenerate the village.

It is considered that the Z14 zoning of the site is in line with the strategic principles of the Draft Plan of creating a more compact city with a network of sustainable neighbourhoods and will maximise the potential of this well-connected but underutilised brownfield area located adjacent to the proposed Luas green line extension to Finglas, and proposed Finglas Core Bus Corridor.

All validly submitted planning applications/SHD applications are assessed in accordance with due process and planning policy.

The CE recommends to retain the Z14 zoning of these lands.

Chief Executive's Recommendation

Retain Z14 zoning.

Map B

| Site Address | Draft Plan Zoning | Requested Zoning | CE Recommendation | Map Sheet | Map Reference |
|---|-------------------|------------------|-------------------|---------------|---------------|
| Blessed Margaret Ball Church, Santry | Z1 | Z15 | Z15 | Map B | B-0001 |
| Cadbury's Pitch and Putt, Coolock, Dublin 5 | Z6 | Z10 | Z10 | Map B | B-0004 |
| Church of St. Paul, Ayrfield, Dublin 13 | Z15 | Z12 | Z15 | Map B | B-0005 |
| Church of the Virgin Mary, Shangan Road, Ballymun, Dublin 9 | Z15 | Z12 | Z15 | Map B | B-0006 |
| Circle K Nevin, Ballymun Road, Dublin 9 | Z1 | Z3 | Z3 | Map B | B-0007 |
| Clontarf Golf Club | Z9/ Z1 | Z14 | Z9/ Z1 | Map B / Map F | B-0008 |
| Collins Avenue Bring Centre | Z1 | Not specified/Z6 | Z1 | Map B | B-0009 |
| Corpus Christi Parochial Hall, Home Farm Road, Drumcondra, Dublin 9 | Z1 | Z15 | Z15 | Map B | B-0010 |
| Corpus Christi Girls NS, Home Farm Road, Drumcondra, Dublin 9 | Z15 | Z12 | Z15 | Map B | B-0011 |
| DCU Lands, Griffith Avenue Dublin 9 | Z9 | Z12 | Z9 | Map B | B-0012 |
| Holy Child NS, Larkhill Road, Whitehall, Dublin 9 | Z15 | Z12 | Z15 | Map B | B-0013 |
| Holy Child Boys NS, Larkhill Road, Whitehall, Dublin 9 | Z15 | Z12 | Z15 | Map B | B-0014 |
| Holy Spirit Boys NS, Silloge Road, Ballymun, Dublin 11 | Z15 | Z12 | Z15 | Map B | B-0015 |
| Holy Spirit Girls NS, Silloge Road, Ballymun Dublin 11 | Z15 | Z12 | Z15 | Map B | B-0015 |
| Holy Spirit, Silloge Road | Z15 | Z12 | Z15 | Map B | B-0015 |
| Santry Industrial Estate | Z6 | Z1/Z6 | Z6 | Map B | B-0016 |
| 1-3 Malahide Road, Coolock, Dublin 17 | Z6 | Z1/Z4 or Z14 | Z10 | Map B | B-0017 |
| Airvista Office Park, Swords Road, Santry | Z3/ Z6 | Z1 | Z3/ Z6 | Map B | B-0018 |
| Margaret Aylward Community College, Whitehall | Z1 | Z15 | Z15 | Map B | B-0019 |
| Oscar Traynor Road | Z12 | Not Specified | Z12 | Map B | B-0020 |
| Our Lady Immaculate Junior NS, Darndale, Dublin 17 | Z15 | Z12 | Z15 | Map B | B-0021 |
| Our Lady Immaculate Senior NS, Darndale, Dublin 17 | Z15 | Z12 | Z15 | Map B | B-0021 |
| Our Lady of Consolation, Donnycarney, Dublin 5 | Z12/ Z15 | Z12 | Z15 / Z12 | Map B | B-0022 |

| | | | | | |
|--|-----------|-----|-----------|-------|--------|
| Our Lady of Consolation NS, Collins Avenue East, Donnycarney, Dublin 5 | Z15 | Z12 | Z15 | Map B | B-0023 |
| Scoil Chiarain CBS, Collins Avenue East, Donnycarney, Dublin 5 | Z15 | Z12 | Z15 | Map B | B-0023 |
| Our Lady of Mercy, Brookwood Grove, Artane | Z12 / Z15 | Z12 | Z12/ Z15 | Map B | B-0024 |
| Our Lady of Victories Boys NS, Ballymun Road, Dublin 9 | Z15 | Z12 | Z15 | Map B | B-0025 |
| Our Lady of Victories Girls NS, Ballymun Road, Dublin 9 | Z15 | Z12 | Z15 | Map B | B-0025 |
| Our Lady of Victories Infant NS, Ballymun Road, Dublin 9 | Z15 | Z12 | Z15 | Map B | B-0025 |
| Our Lady of Victories, Ballymun Road, Dublin 9 | Z12/ Z15 | Z12 | Z12 / Z15 | Map B | B-0026 |
| Scoil Chaitriona Cailini, Measc Avenue, Coolock, Dublin 5 | Z15 | Z12 | Z15 | Map B | B-0027 |
| Scoil Chaitriona Infants, Measc Avenue, Coolock, Dublin 5 | Z15 | Z12 | Z15 | Map B | B-0027 |
| St. Brendan's Boys NS, McAuley Road, Artane, Dublin 5 | Z15 | Z12 | Z15 | Map B | B-0028 |
| Scoil Fhursa, Cromcastle Green, Kilmore West, Dublin 5 | Z15 | Z12 | Z15 | Map B | B-0029 |
| Scoil IDE, Cromcastle Green, Kilmore West, Dublin 5 | Z15 | Z12 | Z15 | Map B | B-0029 |
| Scoil Mhuire Marina, Griffith Avenue, Marino, Dublin 9 | Z15 | Z12 | Z15 | Map B | B-0030 |
| Scoil Mobhi, Bothar Mobhi Glasnaion, Baile Atha Cliath 9 | Z15 | Z12 | Z15 | Map B | B-0031 |
| Scoil na tSeachtar Laoch, Bothar Bhaile Munna, Baile Atha Cliath 11 | Z15 | Z12 | Z15 | Map B | B-0032 |
| Sladmore Avenue, Ard Na Greine, Dublin 13 | Z9 | Z9 | Z15 | Map B | B-0033 |
| Shanowen / Santry, Dublin 9 | Z1 | Z6 | Z1/Z10 | Map B | B-0034 |
| Scoil Neasain, Baile Heman, Baile Atha Cliath 5 | Z15 | Z12 | Z15 | Map B | B-0035 |
| St. Brigid's Boys NS, St. Brigid's Road, Killester, Dublin 5 | Z15 | Z12 | Z15 | Map B | B-0036 |
| St. Brigid's Girls NS, St. Brigid's Road, Killester, Dublin 5 | Z15 | Z12 | Z15 | Map B | B-0037 |
| St. Brigids, Howth Road, Killester | Z1 | Z12 | Z15 | Map B | B-0038 |

| | | | | | |
|--|-------------|------------------|--------------|-------|--------|
| St. Fiachra's Junior NS, Montrose Park, Beaumont, Dublin 5 | Z15 | Z12 | Z15 | Map B | B-0040 |
| St. Fiachra's Senior NS, Montrose Park, Beaumont, Dublin 5 | Z15 | Z12 | Z15 | Map B | B-0040 |
| St. Francis Junior NS, Clonshaugh Drive, Priorswood, Dublin 17 | Z15 | Z12 | Z15 | Map B | B-0041 |
| St. Francis Senior NS, Clonshaugh, Priorswood, Dublin 17 | Z15 | Z12 | Z15 | Map B | B-0041 |
| St. Francis of Assisi, Priorswood, Dublin 17 | Z15 | Z12 | Z15/ Z1 | Map B | B-0042 |
| St. John of God GNS, Kilmore Road, Artane, Dublin 5 | Z15 | Z12 | Z15 | Map B | B-0043 |
| St. John Vianney | Z15/ Z12 | Z15/ Z9/ Z12 | Z15/ Z12/ Z1 | Map B | B-0044 |
| St. Joseph the Artisan, Greencastle Road, Dublin 17 | Z15 | Z12 | Z15 / Z1 | Map B | B-0045 |
| St. Joseph's NS, Macroon Road, Bonnybrook, Dublin 17 | Z15 | Z12 | Z15 | Map B | B-0046 |
| St. Joseph's Primary School for Children with Visual Impairment, Greenpark Road, Drumcondra, Dublin 9 | Z15 | Z12 | Z15 | Map B | B-0048 |
| St. Joseph's Junior NS, Balcurris Road, Ballymun, Dublin 11 | Z15 | Z12 | Z15 | Map B | B-0049 |
| St. Joseph's Senior NS, Balbutcher Lane, North Balvurris Ballymun Dublin 11 | Z15 | Z12 | Z15 | Map B | B-0049 |
| St. Malachy's Boys NS, Edenmore, Raheny, Dublin 5 | Z15 | Z12 | Z15 | Map B | B-0050 |
| St. Monica's Infant Girls NS, Edenmore, Raheny, Dublin 5 | Z15 | Z12 | Z15 | Map B | B-0051 |
| St. Monica's, Edenmore Crescent, Dublin 5 | Z15 | Z12 | Z15 | Map B | B-0052 |
| St. Paul's Pitches | Z15/Z9 | Z9/Z1/Z15 | Z9/ Z1 | Map B | B-0053 |
| St. David's Boys N.S Kilmore Road, Artane, Dublin 5 | Z15 | Z12 | Z15 | Map B | B-0054 |
| St. Pauls Special School, Beaumont Woods, Beaumont, Dublin 5 | Z1 | Z12 | Z15 | Map B | B-0055 |
| St. Vincent de Paul, Griffith Avenue, Dublin 9 | Z15 | Z12 | Z15 | Map B | B-0056 |
| The Church of the Nativity of Our Lord, Montrose Park, Beaumont, Dublin 5 | Z15 | Z12 | Z15 | Map B | B-0057 |
| Tolka House Pub, Finglas | Z1 | Not Specified | Z3 / Z9 | Map B | B-0058 |

| | | | | | |
|--|------------|-----|---------|-------|--------|
| Virgin Mary Boys NS, Shangan Road, Ballymun Dublin 9 | Z15 /Z1 | Z12 | Z15/ Z1 | Map B | B-0059 |
| Virgin Mary Girls NS, Shangan Road, Ballymun, Dublin 9 | Z15/Z1 | Z12 | Z15/ Z1 | Map B | B-0059 |
| Woodlands, Clonshaugh Road, Dublin 17, D17 FT27 | Z6/Z12 | Z1 | Z6/Z12 | Map B | B-0060 |
| Kilmore Road | Z4 | Z4 | Z4 | Map B | B-0061 |
| Scoil Chiaran, St. Canices Road, Glasnevin, Dublin 11 | Z15 | Z12 | Z15 | Map B | B-0062 |
| Glasnevin Convent | Z15/Z9 | Z9 | Z12/Z9 | Map B | B-0068 |
| St. Paul's Junior NS, Ard na Greine Ayrfield, Malahide Road, Dublin 13 | Z15 | Z12 | Z15 | Map B | B-0069 |
| St. Paul's Senior NS, Ayrfield Malahide Road, Dublin 13 | Z15 | Z12 | Z15 | Map B | B-0069 |
| Corpus Christi Church, Home Farm Road, Drumcondra, Dublin 9 | Z15 | Z12 | Z15 | Map B | B-0070 |

Map Reference: B-0001

Site Address: Blessed Margaret Ball Church, Santry

Draft Plan Zoning: Z1

Requested Zoning: Z15

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of Blessed Margaret Ball Church, Santry from Z1 to Z15.

Chief Executive's Response

The site sought for rezoning includes a church and adjoining car park. The church provides important religious and community services to the local area to which it serves. The development potential of the site is considered limited and would likely require demolition of the existing church building or substantial reconfiguration of the site in order to accommodate a meaningful development.

The existing use on the site is considered important social and community infrastructure, and having regard to the finite nature of such lands, it is considered appropriate that they are retained for such use. The CE is of the view that church buildings such as this one can potentially be utilised for a variety of ecclesiastical and community purposes. In addition, it is noted that Z15 allows consideration for a number of residential institutional uses and assisted living/retirement accommodation. Should the existing church use become unviable or no longer needed by the Diocese, the opportunity remains to seek a variation to the plan in accordance with the provisions of the zoning objective. As such, Z15 (Community and Social Infrastructure) is recommended having regard to the established social and community use.

Chief Executive's Recommendation

It is recommended to rezone the lands from Z1 to Z15.

Map Reference: B-0004

Site Address: Cadbury's Pitch and Putt, Coolock, Dublin 5

Draft Plan Zoning: Z6

Requested Zoning: Z10

CE Recommended Zoning: Z10

Summary

A submission seeks the rezoning of the subject site from Z6 to Z10. It notes that the site no longer forms part of the Cadbury's complex, has no active recreational use and was never a public facility. The site is well located in close proximity to public transport connections and the current Z6 zoning would preclude its development for housing. The development of the site for more intensive mixed uses would be in accordance with national and regional policy.

It is submitted that the subject lands are suitable to provide for sustainable mixed use development, which would support the enhancement and augmentation of facilities and services available in the wider area and accommodate the increasing population of Coolock and the wider city area. The submission states that if appropriate, a specific local objective to provide 15% open space on the site could be considered.

Chief Executive's Response

The site is located in close proximity to good public transport connections as well as local facilities and amenities. It is noted that the site is currently vacant and has not been utilised as a pitch and put course for a number of years. The wider area is well served by public amenity and recreational facilities including the nearby Stardust Memorial Park.

The CE considers that the site is underutilised and has potential for intensification for appropriate mixed use development in accordance with the principles of the 15 minute City and compact growth. It is considered that a Z10 zoning is more appropriate, having regard to the location of the site and the adjoining uses, than its current Z6 zoning and would facilitate appropriate mixed use development and active frontage along the Oscar Traynor Road.

Open space standards are fully addressed under Chapter 15 of the Draft Plan and any application will be required to comply with these standards as a minimum.

Chief Executive's Recommendation

It is recommended to rezone the lands from Z6 to Z10.

Map Reference: B-0005

Site Address: Church of St. Paul, Ayrfield, Dublin 13

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this church site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services in the area. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

The site sought for rezoning includes a church and adjoining car park. The church provides important religious and community services to the local area to which it serves. The development potential of the site is considered limited and would likely require demolition of the existing church building or substantial reconfiguration of the site in order to accommodate a meaningful development.

The existing use on the site is considered important social and community infrastructure, and having regard to the finite nature of such lands, it is considered appropriate that they are retained for such use. The CE is of the view that church buildings such as this one can potentially be utilised for a variety of ecclesiastical and community purposes. In addition, it is noted that Z15 allows consideration for a number of residential institutional uses and assisted living/retirement accommodation. Should the existing church use become unviable or no longer needed by the Diocese, the opportunity remains to seek a variation to the plan in accordance with the provisions of the zoning objective. As such, in the absence of clear development objectives for the site by the Diocese, the rezoning of the site to Z12 would be premature and would result in a potential loss of community amenities and facilities in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0006

Site Address: Church of the Virgin Mary, Shangan Road, Ballymun, Dublin 9

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this church site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services in the area. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

The site sought for rezoning includes a church, presbytery buildings and community garden. The church and adjoining lands provide important religious and community services to the local area to which it serves. The development potential of the site is considered limited and would likely require demolition of the existing church building or substantial reconfiguration of the site in order to accommodate a meaningful development.

The existing uses on the site are considered important social and community infrastructure, and having regard to the finite nature of such lands, it is considered appropriate that they are retained for such use. The CE is of the view that church buildings and lands such as this one can potentially be utilised for a variety of ecclesiastical and community purposes. In addition, it is noted that Z15 allows consideration for a number of residential institutional uses and assisted living/retirement accommodation. Should the existing church use become unviable or no longer needed by the Diocese, the opportunity remains to seek a variation to the plan in accordance with the provisions of the zoning objective. As such, in the absence of clear development objectives for the site by the Diocese, the rezoning of the site to Z12 would be premature and would result in a potential loss of community amenities and facilities in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0007

Site Address: Circle K Nevin, Ballymun Road, Dublin 9

Draft Plan Zoning: Z1

Requested Zoning: Z3

CE Recommended Zoning: Z3

Summary

A submission seeks the rezoning of Circle K Nevin service station, Ballymun Road, Dublin 9 from Z1 to Z3 on basis of the established/ permitted commercial use and its ongoing operation/ future development potential.

Chief Executive's Response

It is considered that the rezoning of the site from Z1 to Z3 zoning is appropriate having regard to the existing use of the site for local services. The Z3 (Neighbourhood Centres) zoning will protect the future development potential to expand the existing facility to cater for additional local neighbourhood centre needs

Chief Executive's Recommendation

Rezone to Z3.

Map Reference: B-0008

Site Address: Clontarf Golf Club

Draft Plan Zoning: Z9/ Z1

Requested Zoning: Z14

CE Recommended Zoning: Z9/ Z1

Summary

A detailed submission was made with regard to the subject site requesting that the site be rezoned from Z9 to Z14 and that it should be designated as an SDRA. The submission notes that the lands have significant capacity to accommodate residential development and provide much needed homes in an area well served by public transport and existing facilities and amenities. It notes that there is an option for the existing golf course to relocate to Abbeyville in Kinsealy.

Chief Executive's Response

It is acknowledged that the Clontarf Golf Club is located in a highly accessible area of the city, well served by quality public transport and local services in close proximity to the city centre. Whilst the strategic development of these lands would have the potential to provide for much needed housing in the city, the lands are not strictly necessary to address the aim of the draft core strategy. However, the site currently provides for high quality amenities and facilities which support the 15 minute city concept and is, therefore, considered necessary to retain in the short term. A very small portion of the lands facing onto Collins Avenue is zoned Z1.

The strategic development of this site would require detailed planning analysis, master planning and stakeholder consultation given the significant scale of the site in order to deliver the most appropriate land use mix and development for the area. It is, therefore, considered that the rezoning of the site to Z14 is premature pending further analysis of the area.

Chief Executive's Recommendation

Retain existing Z9/Z1 zoning objective. See also CE summary, response and recommendations regarding Chapter 13.

Map Reference: B-0009

Site Address: Collins Avenue Bring Centre, Collins Avenue Extension, Whitehall

Draft Plan Zoning: Z1

Requested Zoning: Not specified/Z6

CE Recommended Zoning: Z1

Summary

A number of submissions object to the zoning of the Dublin City Council Bring Centre on Collins Avenue Z1 (some mistakenly stated it had been changed from Z6) noting concerns in respect to overdevelopment, increased traffic and a lack of supporting infrastructure in the area and the loss of a local bring centre.

Chief Executive's Response

The Z1 zoning of the Bring Centre and adjoining lands on Collins Avenue is long established and remains unchanged from the 2016 Development Plan. These Council lands have potential to provide a quality infill housing project in a well serviced location that will provide much needed housing and improve local connectivity. A new depot and improved civic amenity recycling centre is currently under construction close to these lands at Ballymun.

Chief Executive's Recommendation

Retain Z1 zoning.

Map Reference: B-0010

Site Address: Corpus Christi Parochial Hall, Home Farm Road, Drumcondra, Dublin 9

Draft Plan Zoning: Z1

Requested Zoning: Z15

CE Recommended Zoning: Z15

Summary

A number of submissions were made seeking the rezoning of the parochial hall to the Z15 zoning objective in order to protect its use for community and social infrastructure. They also requested that a specific objective be included in the Draft Plan to protect the hall for such use.

Chief Executive's Response

The subject building has long been used for social and community infrastructure. Having regard to the location of the site and its longstanding use, it is recommended that it is appropriate to rezone the site to Z15 to safeguard the use of this building into the future. The zoning objective is considered sufficient protection for the site and a specific objective in the plan is not warranted.

Chief Executive's Recommendation

It is recommended this land is zoned from Z1 to Z15.

Map Reference: B-0011

Site Address: Corpus Christi Girls NS, Home Farm Road, Drumcondra, Dublin 9

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0012

Site Address: DCU Lands, Griffith Avenue, Dublin 9

Draft Plan Zoning: Z9

Requested Zoning: Z12

CE Recommended Zoning: Z9

Summary

A submission was made by Dublin City University (DCU) seeking the rezoning of a portion of lands along the north side of Griffith Avenue from Z9 to Z12 in order to facilitate vehicular access to an adjoining Z12 zoned site to the south of the DCU lands. The submission also states that if it the proposed rezoning was not deemed appropriate, the text accompanying the Z9 zoning objective in Chapter 14 could be updated to facilitate vehicular access for sites zoned for urban development.

Chief Executive's Response

The continuous strip of Z9 along the north side of Griffith Avenue is in public ownership and is integral to protecting the tree lined character of the Avenue. Having regard to the function of the Z9 strip and the existence of a number of other existing and potential access points to the DCU lands, Walnut Rise (Griffith Avenue), Collins Avenue Extension (north) and Ballymun Road via Hampstead Avenue (west) to facilitate the future development of the lands, it is considered that it is unnecessary for the lands to be rezoned or the Z9 zoning objective to be modified in response to this submission.

Chief Executive's Recommendation

Retain Z9 zoning.

No change is recommended as existing text in the Draft Plan satisfactorily responds to issues raised.

Map Reference: B-0013

Site Address: Holy Child NS, Larkhill Road, Whitehall, Dublin 9

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0014

Site Address: Holy Child Boys NS, Larkhill Road, Whitehall, Dublin 9

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0015

Site Address: Holy Spirit Boys NS, Silloge Road, Ballymun, Dublin 11

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0015

Site Address: Holy Spirit Girls NS, Silloge Road, Ballymun, Dublin 11

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0015
Site Address: Holy Spirit, Silloge Road
Draft Plan Zoning: Z15
Requested Zoning: Z12
CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this church site and the adjoining Ballymun Regional Youth Resource Centre from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services in the area. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

The site sought for rezoning includes a church and the adjoining Ballymun Regional Youth Resource Centre. The church and Youth Resource Centre provide important religious and community services to the local area to which it serves. The development potential of the site is considered limited and would likely require demolition of the existing buildings or substantial reconfiguration of the site in order to accommodate a meaningful development.

The existing uses on the site are considered important social and community infrastructure, and having regard to the finite nature of such lands, it is considered appropriate that they are retained for such use. The CE is of the view that church buildings such as this one can potentially be utilised for a variety of ecclesiastical and community purposes. In addition, it is noted that Z15 allows consideration for a number of residential institutional uses and assisted living/retirement accommodation. Should the existing church use become unviable or no longer needed by the Diocese, the opportunity remains to seek a variation to the plan in accordance with the provisions of the zoning objective. As such, in the absence of clear development objectives for the site by the Diocese, the rezoning of the site to Z12 would be premature and would result in a potential loss of community amenities and facilities in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0016

Site Address: Santry Industrial Estate Lands, Santry Avenue, Dublin 9

Draft Plan Zoning: Z6

Requested Zoning: Z1/ Z6

CE Recommended Zoning: Z6

Summary:

A number of submissions were received in respect to the Santry Industrial Estate lands. A large proportion of these submissions objected to the rezoning of the lands from Z6 to Z1 on account of concerns expressed in respect to the potential for overdevelopment; construction, parking and traffic impacts; delivery of inappropriate housing tenure and typology; lack of supporting infrastructure; and, density/ height/ residential amenity concerns. A number of submissions also call for the preparation of a Local Area Plan for the Santry area prior to any rezoning taking place.

A single submission received from a landowner sought the rezoning of the lands at Santry Avenue Industrial Estates from Z6 to Z1 in line with (withdrawn) Variation No. 9 to the 2016-2022 Dublin City Development Plan. This submission also raised an issue with the deliverability of the 'Roads, Streets and Bridge Schemes' mapped objective which traverses the lands in the absence of their rezoning to Z1 and subsequent redevelopment.

Chief Executive's Response

The Santry Industrial Estate lands are zoned Z6 as per the 2016-2022 Dublin City Development Plan and the Draft Plan recommends no change to this zoning.

The Santry area has seen a number of large developments in recent years which have raised concerns regarding the provision of public transport and community infrastructure. For this reason the Draft Plan includes the intent to prepare a Local Area Plan (LAP) for the Santry area. This plan will look at these future needs and the long term development of industrial lands in the area in order to support sustainable development and the 15 minute city approach. The preparation of an LAP may inform a future variation to the Development Plan. In advance of the research and preparatory work to inform an LAP for the Santry area, any zoning change within this area is considered premature.

The 'Roads, Streets and Bridge Schemes' mapped objective crossing the site can be delivered with any proposed future redevelopment.

Chief Executive's Recommendation

Retain Z6 zoning.

Map Reference: B-0017

Site Address: 1-3 Malahide Road, Coolock, Dublin 17

Draft Plan Zoning: Z6

Requested Zoning: Z1/Z4 or Z14

CE Recommended Zoning: Z10

Summary:

A submission was made seeking the rezoning of the subject site at 1-3 Malahide Road from Z6 to Z1/Z4 or Z14 on the basis of its largely vacant/ underutilised condition and optimal location proximate to public transport, local services and amenities. The submission stated that the rezoning of the site would provide a regeneration opportunity and support the plan's Core Strategy.

Chief Executive's Response:

The subject lands are located within a well-established residential area that is well served by public transport bus routes, community and social uses. The CE considers that the rezoning of the lands to Z10 would provide a mix of uses and coherent streetscape given their prominent location fronting onto the Malahide Road. Furthermore, in the interests of providing for coherent land use zoning at this location, the CE proposes to rezone a larger area of land surrounding the subject site from Z6 to Z10 in order to provide for a substantial block of urban development fronting the junction of Malahide Road and Greencastle Road, and extending to Greencastle Parade.

Chief Executive's Recommendation

It is recommended that these lands are rezoned from Z6 to Z10.

Map Reference: B-0018

Site Address: Airvista Office Park, Swords Road, Santry

Draft Plan Zoning: Z3/ Z6

Requested Zoning: Z1

CE Recommended Zoning: Z3/ Z6

Summary

This submission requests a change in the relevant zoning objective from Z6 / Z3 to Z1 'Sustainable Residential Neighbourhoods' as it relates to the property at Airvista Office Park, Santry, to facilitate regeneration for a residential development. The zoning is considered appropriate and in the interests of proper planning and sustainable development of the area. It is stated that the requested amendment is suitable in the context of ongoing development of the area and in the context of approved and built residential developments located directly north (Santry Place), south (Omni Living SHD) and across (Swiss Cottage) from the site. The submission also notes the suitability of the site for residential development having regard to its proximity to Santry KUV and good public transport connections. It is also noted that the site is brownfield in character and suitable for intensification.

Chief Executive's Response

The Santry area has seen a number of large developments in recent years which have raised concerns regarding the provision of public transport and community infrastructure. For this reason the Draft Plan includes the intent to prepare a Local Area Plan (LAP) for the Santry area. This plan will look at these future needs and the long term development of industrial lands in the area in order to support sustainable development and the 15 minute city approach. The preparation of an LAP may inform a future variation to the Development Plan. In advance of the research and preparatory work to inform an LAP for the Santry area, any zoning change within this area is considered premature.

However, the CE recommends that a small portion of the site, incorporating the full footprint of the cluster of buildings onto Swords Road, from Z6 to Z3 to consolidate the neighbourhood zoning at this location.

Chief Executive's Recommendation

It is recommended that a portion of site is rezoned from Z6 to Z3, incorporating the footprint of the block of buildings onto Swords Road.

Map Reference: B-0019

Site Address: Margaret Aylward Community College and Whitehall Church, Whitehall

Draft Plan Zoning: Z1

Requested Zoning: Z15

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of Margaret Aylward Community College and Whitehall Church, Whitehall from Z1 to Z15.

Chief Executive's Response

In relation to the Community College, a detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, it is considered that the school should be zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

In relation to the church building; which is in use; the church provides important religious and community services to the local area to which it serves. The development potential of the site is considered limited and would likely require demolition of the existing buildings or substantial reconfiguration of the site in order to accommodate a meaningful development.

The existing uses on the site are considered important social and community infrastructure, and having regard to the finite nature of such lands, it is considered appropriate that they are retained for such use. The CE is of the view that church buildings such as this one can potentially be utilised for a variety of ecclesiastical and community purposes. In addition, it is noted that Z15 allows consideration for a number of residential institutional uses and assisted living/retirement accommodation. It is considered, therefore, that the church would be more appropriately zoned Z15.

Chief Executive's Recommendation

It is recommended that these lands are rezoned from Z1 to Z15.

Map Reference: B-0020
Site Address: Oscar Traynor Road
Draft Plan Zoning: Z12
Requested Zoning: Not Specified
CE Recommended Zoning: Z12

Summary

This submission requests that the Z12 Institutional Land (Future Development Potential) zoning attached to the Oscar Traynor Road site be reviewed and that the reference to 'institutional use' be removed from the zoning objective. The submission states that the site does not fulfil the characteristics of institutional land and raises concerns in respect to the potential for the zoning to constrain the density of residential development achievable thereby conflicting with the wider objectives of the plan. The submission further calls for a review of the city's Z12 land bank to be undertaken and sites which do not meet the criteria for institutional lands to be subject to a modified Z12 zoning which removes reference to institutional use.

Chief Executive's Response

The subject lands comprise a large greenfield site with the potential to accommodate a significant quantum of residential development and associated amenities and open space. Whilst it is noted that the Z12 zoning refers to Institutional Land, the land use zoning objective is to "ensure existing environmental amenities are protected in the predominantly residential future use of these lands". In the context of the subject site, the CE notes that they have been in public ownership for many years. It is considered that the Z12 zoning objective is the most appropriate for the site as it will ensure that a minimum of 25% of the subject site shall be retained for public open space and provide for a significant new public amenity open space area in tandem with residential development.

Chief Executive's Recommendation

Retain Z12 zoning.

Map Reference: B-0021

Site Address: Our Lady Immaculate Junior NS, Darndale, Dublin 17

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Dublin 17 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0021

Site Address: Our Lady Immaculate Senior NS, Darndale, Dublin 17

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0022

Site Address: Our Lady of Consolation, Donnycarney, Dublin 5

Draft Plan Zoning: Z12/Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15/Z12

Summary

A submission seeks the rezoning of this church site, adjoining car park, Le Chéile Donnycarney Community and Youth Centre, scouts hall and Clancarthy Court senior citizens dwellings from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services in the area. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

The site sought for rezoning includes a church, Le Chéile Donnycarney Community and Youth Centre, scouts hall and Clancarthy Court senior citizens dwellings. The church, youth centre, scouts hall and senior citizens dwellings provide important religious and community services and supported residential units for the local area to which they serve. The development potential of the site is considered limited and would likely require demolition of the existing buildings or substantial reconfiguration of the site in order to accommodate a meaningful development. The car park adjoining the existing church is zoned Z12 under the Draft Development Plan.

The existing uses on the site are considered important social and community infrastructure, and having regard to the finite nature of such lands, it is considered appropriate that they are retained for such use. The CE is of the view that church buildings such as this one can potentially be utilised for a variety of ecclesiastical and community purposes. In addition, it is noted that Z15 allows consideration for a number of residential institutional uses and assisted living/retirement accommodation. Should the existing church use become unviable or no longer needed by the Diocese, the opportunity remains to seek a variation to the plan in accordance with the provisions of the zoning objective. As such, in the absence of clear development objectives for the site by the Diocese, the rezoning of the church site, Le Chéile Donnycarney Community and Youth Centre, scouts hall and Clancarthy Court senior citizens dwellings to Z12 would be inappropriate and could result in a potential loss of community amenities and facilities in the area.

Chief Executive's Recommendation

Retain Z12 and Z15 zoning.

Map Reference: B-0023

Site Address: Our Lady of Consolation NS, Collins Avenue East, Donnycarney, Dublin 5

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0023

Site Address: Scoil Chiarain CBS, Collins Avenue East, Donnycarney, Dublin 5

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0024

Site Address: Our Lady of Mercy, Brookwood Grove, Artane

Draft Plan Zoning: Z12/Z15

Requested Zoning: Z12

CE Recommended Zoning: Z12/Z15

Summary

A submission seeks the rezoning of this church site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services in the area. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

The site sought for rezoning includes a church building at the junction of Gracefield Road and Brookwood Grove. The car park adjoining the existing church is zoned Z12 under the Draft Development Plan. The church provides important religious and community services to the local area to which it serves. The development potential of the site is considered limited and would likely require demolition of the existing buildings or substantial reconfiguration of the site in order to accommodate a meaningful development.

The existing uses on the site are considered important social and community infrastructure, and having regard to the finite nature of such lands, it is considered appropriate that they are retained for such use. The CE is of the view that church buildings such as this one can potentially be utilised for a variety of ecclesiastical and community purposes. In addition, it is noted that Z15 allows consideration for a number of residential institutional uses and assisted living/retirement accommodation. Should the existing church use become unviable or no longer needed by the Diocese, the opportunity remains to seek a variation to the plan in accordance with the provisions of the zoning objective. As such, in the absence of clear development objectives for the site by the Diocese, the rezoning of all of the church site to Z12 would be premature and would result in a potential loss of community amenities and facilities in the area.

Chief Executive's Recommendation

Retain Z12 and Z15 zoning.

Map Reference: B-0025

Site Address: Our Lady of Victories Boys NS, Ballymun Road, Dublin 9

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0025

Site Address: Our Lady of Victories Girls NS, Ballymun Road, Dublin 9

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0025

Site Address: Our Lady of Victories Infant NS, Ballymun Road, Dublin 9

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0026

Site Address: Our Lady of Victories, Ballymun Road, Dublin 9

Draft Plan Zoning: Z12/Z15

Requested Zoning: Z12

CE Recommended Zoning: Z12/Z15

Summary

A submission seeks the rezoning of this church site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services in the area. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

The site sought for rezoning includes a church building and adjoining open space area fronting onto Ballymun Road. The car park adjoining the existing church is zoned Z12 under the Draft Development Plan. The church provides important religious and community services to the local area to which it serves. The development potential of the site is considered limited and would likely require demolition of the existing building or substantial reconfiguration of the site in order to accommodate a meaningful development.

The existing use on the site is considered important social and community infrastructure, and having regard to the finite nature of such lands, it is considered appropriate that they are retained for such use. The CE is of the view that church buildings such as this one can potentially be utilised for a variety of ecclesiastical and community purposes. In addition, it is noted that Z15 allows consideration for a number of residential institutional uses and assisted living/retirement accommodation. Should the existing church use become unviable or no longer needed by the Diocese, the opportunity remains to seek a variation to the plan in accordance with the provisions of the zoning objective. As such, in the absence of clear development objectives for the site by the Diocese, the rezoning of all of the church site to Z12 would be premature and would result in a potential loss of community amenities and facilities in the area.

Chief Executive's Recommendation

Retain Z12 and Z15 zoning.

Map Reference: B-0027

Site Address: Scoil Chaitriona Cailini, Measc Avenue, Coolock, Dublin 5

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0027

Site Address: Scoil Chaitriona Infants, Measc Avenue, Coolock, Dublin 5

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0028

Site Address: St. Brendan's Boys NS, McAuley Road, Artane, Dublin 5

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0029

Site Address: Scoil Fhursa, Cromcastle Green, Kilmore West, Dublin 5

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0029

Site Address: Scoil IDE, Cromcastle Green, Kilmore West, Dublin 5

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0030

Site Address: Scoil Mhuire Marino, Griffith Avenue, Marino, Dublin 9

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0031

Site Address: Scoil Mobhi, Bothar Mobhi Glasnaion, Baile Atha Cliath 9

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0032

Site Address: Scoil na tSeachtar Laoch, Bothar Bhaile Munna, Baile Atha Cliath 11

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0033

Site Address: Sladmore Avenue, Ard Na Greine, Dublin 13

Draft Plan Zoning: Z9

Requested Zoning: Z9

CE Recommended Zoning: Z15

Summary

A large number of submissions were received supporting the zoning of the subject site as Z9. The submissions note that the area is used as an open space facility for the local community and is considered an important asset.

Chief Executive's Response

The subject lands comprise an area of open space within a well-established residential area that is currently well served by public transport bus routes and community and social uses and open space in the immediate area.

The site has been identified by the City Housing Department as a suitable site for a small scale infill housing scheme for the elderly. At a city and local level, there is a need to provide appropriate step down housing to meet the needs of our ageing population. Such a housing scheme at this location enables the elderly to stay within their communities where they have good access to existing facilities and amenities.

Whilst it is recognised that there is strong support at a local level for the zoning of this site as Z9, it is considered by the CE that this is a poor use of an underutilised open space that does not have a high level of amenity and has poor passive surveillance. Furthermore, it is noted that this area is well served by public open space and there is a large area of communal open space to the immediate south at Ayrfield Park.

The CE considers that it is incumbent upon the council to review lands in the outer suburbs that are suitable for small scale infill housing. It is recommended that the site should retain a Z15 zoning as per the current 2016 plan. Under this objective, 25% of the site would be retained as open space. It is considered that the Z15 zoning would be a more appropriate zoning for the site. It would ensure that much needed social housing for the elderly could be delivered in conjunction with high quality open space.

Chief Executive's Recommendation

It is recommended that these lands are rezoned from Z9 to Z15.

Map Reference: B-0034

Site Address: Shanowen / Santry, Dublin 9

Draft Plan Zoning: Z1

Requested Zoning: Z6

CE Recommended Zoning: Z1/Z10

Summary

A large number of submissions were received in respect to the zoning of sites along the north and south of Shanowen Road in Whitehall and included submissions made in respect of Santry Garda Station and lands adjoining Shanliss Road. The submissions made principally object to the existing residential (Z1) zoning of lands adjoining Shanowen Road, with a smaller number of these submissions taking issue with zoning of the garda station changing from Z6 to Z1 under the Draft Plan, with concerns raised in respect to the likely knock-on impact on local public safety, security, emergency access and loss of state ownership of site.

Objections to the residential zoning of the subject lands are put forward on grounds including perceived overdevelopment, construction, parking and traffic impacts, delivery of inappropriate housing tenure and typology, lack of supporting infrastructure and density/ height/ residential amenity concerns. A number of submissions also call for the preparation of a Local Area Plan for the Santry area prior to any rezoning taking place.

Chief Executive's Response

The lands on the south side of Shanowen Road are zoned Z1 as per the 2016-2022 Dublin City Development Plan; with over half of the lands built out for residential use. It is considered that the existing Z1 zoning should remain and no change is recommended.

The lands on the north side of Shanowen Road, which incorporate Santry Garda Station, are located in a well-served residential area. The lands are also characterised by low scale development and large areas of surface car parking and, given their current underutilisation, provide a good opportunity for residential and mixed use redevelopment that can accommodate local business and leisure uses alongside new housing; supporting the 15 minute city principle.

The various concerns regarding redevelopment are noted and it is considered that these could most appropriately be dealt with in the context of the development management process where necessary measures can be included in any redevelopment. The requirement for lands with a Z10 zoning to prepare a masterplan to inform future redevelopment of the lands (which are in excess of 1ha in size) will provide the opportunity for a structured approach to any future redevelopment.

Chief Executive's Recommendation:

It is recommended to Retain Z1 zoning on the south side of Shanowen Road as per the Draft Plan and to rezone the lands to the north of Shanowen Road from Z1 in the Draft Plan to Z10.

Map Reference: B-0035

Site Address: Scoil Neasain, Baile Heman, Baile Atha Cliath 5

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0036

Site Address: St. Brigid's Boys NS, St. Brigid's Road, Killester, Dublin 5

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0037

Site Address: St. Brigid's Girls NS, St. Brigid's Road, Killester, Dublin 5

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0038

Site Address: St. Brigid's, Howth Road, Killester

Draft Plan Zoning: Z1

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of church sites from Z15 to Z12. In relation to the subject site, the request relates to a rezoning from Z1 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services.

Chief Executive's Response

The sites sought for rezoning all accommodate substantial church structures which provide important religious and pastoral services to the community to which they serve. The development potential of these sites is considered limited and would likely require demolition of the existing church building or substantial reconfiguration of the site in order to accommodate a meaningful infill development. It is considered in the absence of clear development objectives for these sites by the Diocese, that the rezoning of these sites to Z12 would be premature. The existing uses on these sites are considered important social and community infrastructure, and having regard to the finite nature of such lands, it is considered appropriate that they are retained for such use. The CE is of the view that such church buildings can potentially be utilised for a variety of ecclesiastical and community purposes

In relation to the subject site, it is considered that a Z15 zoning is appropriate to reflect the established use of the site and to provide for future essential community and social infrastructure provision. Having regard to the adjacent Parish Resource Centre and its intrinsic relationship with the existing church building, this is also recommended for zoning to Z15 to protect its use going forward for social and community infrastructure. It is noted that Z15 allows consideration for a number of residential institutional uses and assisted living/retirement accommodation. Should the existing church use become unviable or no longer needed by the Diocese, the opportunity remains to seek a variation to the plan in accordance with the provisions of the zoning objective.

Chief Executive's Recommendation

Rezone as Z15.

Map Reference: B-0040

Site Address: St. Fiachra's Junior NS, Montrose Park, Beaumont, Dublin 5

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0040

Site Address: St. Fiachra's Senior NS, Montrose Park, Beaumont, Dublin 5

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0041

Site Address: St. Francis Junior NS, Clonshaugh Drive, Prorswood, Dublin 17

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0041

Site Address: St. Francis Senior NS, Clonshaugh, Priorswood, Dublin 17

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0042

Site Address: St. Francis of Assisi, Priorswood, Dublin 17

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15 and Z1

Summary

A submission seeks the rezoning of this church site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services in the area. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

The site sought for rezoning includes a church building, adjoining car park, pastoral centre, parochial house and open space areas. The church and pastoral centre provide important religious and community services to the local area to which it serves. The existing church and pastoral centre on the site are considered important social and community infrastructure, and having regard to the finite nature of such lands, it is considered appropriate that they are retained for such use. The CE is of the view that church buildings such as this one can potentially be utilised for a variety of ecclesiastical and community purposes. In addition, it is noted that Z15 allows consideration for a number of residential institutional uses and assisted living/retirement accommodation. Should the existing church building become unviable or no longer needed by the Diocese, the opportunity remains to seek a variation to the plan in accordance with the provisions of the zoning objective. As such, in the absence of clear development objectives for the church building and pastoral centre by the Diocese, the rezoning of the church and pastoral centre to Z12 would be premature and would result in a potential loss of community amenities and facilities in the area.

Large parts of the site are currently underutilised including the open space areas to the west of the church building and south of the parochial house and are well located for residential purposes, including social, affordable and/or senior citizens housing and as such, Z1 (Sustainable Residential Neighbourhoods) is recommended as the appropriate zoning for those parts of the site and the parochial house.

Chief Executive's Recommendation

Retain Z15 zoning to church building and pastoral centre.

It is recommended to rezone the open space areas to the west of the church building, the parochial house and the open space area to the south of the parochial house from Z15 to Z1.

Map Reference: B-0043

Site Address: St. John of God GNS, Kilmore Road, Artane, Dublin 5

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0044
Site Address: St. John Vianney
Draft Plan Zoning: Z15/Z12
Requested Zoning: Z15/Z9/Z12
CE Recommended Zoning: Z15/Z12/Z1

Summary

A number of submissions were received in regard to the zoning of the church and its associated grounds at St. John Vianney, Ardlea Road, Dublin 5.

A submission by the Archdiocese of Dublin seeks the rezoning of this church site from Z15 to Z12 as the submission states that the current Z15 land use zoning unnecessarily restricts consideration of the development potential of the lands, is inappropriate and inconsistent with the long-term future vision for comprehensive regeneration and redevelopment of Dublin City and will represent an under-utilisation of the site in the short, long and medium term. The brownfield site is centrally located within an existing community, strategically located in close proximity to high quality transport provision and local services and has attendant lands which may no longer be needed for the immediate workings of the Diocese in the medium to long term.

The submission requests that the zoning is amended from Z15 to Z12 to allow the Archdiocese of Dublin to protect their current pastoral, community, educational, and religious requirements and obligations, whilst, in some instances, allow them to achieve their objective regarding the delivery of social and affordable housing. The submission states that the Archdiocese of Dublin welcome the use classes associated with the Z12 zoning, which allows more flexibility than the current Draft Z15 zonings across their sites.

A number of other submissions were made, including from local residents associations, objecting to the rezoning of part of the site from Z15 to Z12 on the basis that it fails to take account of the existence of the parish community centre, will undermine the community/amenity use of the land and would lead to an increase in noise and traffic. The majority of the submissions seek the reinstatement of the Z15 zoning on the majority of the site, with one submission requesting that the eastern portion of the lands are zoned Z9 and a portion of the northern part of the lands zoned Z12. A local residents association put forward a proposal to develop a community Men's Shed, community meeting rooms, children's playground, and a Covid-19 memorial park on the lands.

Chief Executive's Response

The lands are currently in use as low scale and low density development comprising a church, parochial house with resource centre, a cleared site and surface car parking with open space grounds, all located in close proximity to existing residential development within a well-established area that is currently served by good public transport bus routes. The lands are within a short walking distance of the Malahide Road QBC.

The existing cleared site on the south western portion of the site is considered as having infill potential. With ease of access to existing service infrastructure, utilities, community and social infrastructure within the immediate area, the rezoning of this underutilised portion of the lands to Z1 is considered appropriate given its location and proximity to existing services.

The existing uses on the lands are considered important social and community infrastructure, and having regard to the finite nature of such lands, it is considered appropriate that they are retained

for such use. Therefore, it is recommended that the community hall to the north west of the lands is changed from Z12 to Z15 and that the Church continues to retain the Z15 zoning proposed in the Draft Plan. It is recommended that eastern portion of the site remains zoned Z12.

The CE is of the view that church building such as this one can potentially be utilised for a variety of ecclesiastical and community purposes. In addition, it is noted that Z15 allows consideration for a number of residential institutional uses and assisted living/retirement accommodation.

Chief Executive's Recommendation

It is recommended to rezone the south western portion of the site from Z12 to Z1.

It is recommended to rezone the north western portion of the site from Z12 to Z15.

It is recommended to retain the eastern portion of the site as Z12.

Map Reference: B-0045

Site Address: St. Joseph the Artisan, Greencastle Road, Dublin 17

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15/Z1

Summary

A submission seeks the rezoning of this church site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services in the area. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

The site sought for rezoning includes a church building and large adjoining car park. The church provides important religious and community services to the local area to which it serves. The existing church on the site is considered important social and community infrastructure, and having regard to the finite nature of such lands, it is considered appropriate that they are retained for such use. The CE is of the view that church buildings such as this one can potentially be utilised for a variety of ecclesiastical and community purposes. In addition, it is noted that Z15 allows consideration for a number of residential institutional uses and assisted living/retirement accommodation. Should the existing church building become unviable or no longer needed by the Diocese, the opportunity remains to seek a variation to the plan in accordance with the provisions of the zoning objective. As such, in the absence of clear development objectives for the church building and pastoral centre by the Diocese, the rezoning of the church and pastoral centre to Z12 would be premature and would result in a potential loss of community amenities and facilities in the area.

A large part of the site to the south and east of the church building is in use as a car park. This part of the site is well located for residential purposes, including social, affordable and/or senior citizens housing and as such, Z1 (Sustainable Residential Neighbourhoods) is recommended as the appropriate zoning for the eastern part of the site adjoining Greencastle Park.

Chief Executive's Recommendation

Retain Z15 zoning to church building and car park south of the church building.

It is recommended to rezone the car park to the east of the church building, adjoining Greencastle Park, from Z15 to Z1.

Map Reference: B-0046

Site Address: St. Joseph's NS, Macroom Road, Bonnybrook, Dublin 17

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0048

Site Address: St. Joseph's Primary School for Children with Visual Impairment, Greenpark Road, Drumcondra, Dublin 9

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0049

Site Address: St. Joseph's Junior NS, Balcurris Road, Ballymun, Dublin 11

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0049

Site Address: St. Joseph's Senior NS, Balbutcher Lane, North Balcurris, Ballymun Dublin 11

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0050

Site Address: St. Malachy's Boys NS, Edenmore, Raheny, Dublin 5

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0051

Site Address: St. Monica's Infant Girls NS, Edenmore, Raheny, Dublin 5

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0052

Site Address: St. Monica's, Edenmore Crescent, Dublin 5

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this church site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services in the area. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

The site sought for rezoning comprises a church fronting onto Edenmore Crescent. The church provides important religious and community services to the local area to which it serves. The development potential of the site is considered limited and would likely require demolition of the existing church building or substantial reconfiguration of the site in order to accommodate a meaningful development.

The existing use on the site is considered important social and community infrastructure, and having regard to the finite nature of such lands, it is considered appropriate that they are retained for such use. The CE is of the view that church buildings such as this one can potentially be utilised for a variety of ecclesiastical and community purposes. In addition, it is noted that Z15 allows consideration for a number of residential institutional uses and assisted living/retirement accommodation. Should the existing church use become unviable or no longer needed by the Diocese, the opportunity remains to seek a variation to the plan in accordance with the provisions of the zoning objective. As such, in the absence of clear development objectives for the site by the Diocese, the rezoning of the site to Z12 would be premature and would result in a potential loss of community amenities and facilities in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0053

Site Address: Former St. Pauls Playing Pitches, Raheny, Dublin 5

Draft Plan Zoning: Z15/Z9

Requested Zoning: Z9/Z1/Z15

CE Recommended Zoning: Z9/Z1

Summary

A number of submissions were received regarding the site. Some detailed support for the Z9/Z15 zoning objectives and that the site be retained for playing pitch use. A submission from the landowner requested that the site be rezoned to Z1/Z9 and raised serious concerns regarding the planning rationale for the zoning of the lands at Z9.

Chief Executive's Response

The CE notes the submissions with regard the subject site. It is noted however, that the subject site no longer forms part of the institutional lands associated with the adjacent school. The lands are now in private ownership and have not been in active use as sports pitches for some time. There have been a number of applications for housing development on the site.

Having regard to the location of the site and its planning history, it is considered that a balanced approach should be taken to its future development where residential development would be appropriate on part of the site and a portion retained for Z9 use, where open space/amenity/playing pitches etc. could be accommodated. The lands are well serviced and located in close proximity to existing public transport connections and established social and community infrastructure. It is considered by the CE, that their development in part for some residential development, would contribute to the 15 minute city and principles of compact growth. The area recommended to be zoned Z9 is considered appropriate having regard to its proximity to St. Anne's Park and its potential to contribute to the biodiversity and amenity of the area.

Chief Executive's Recommendation

It is recommended these lands are rezoned to Z1 and Z9.

Map Reference: B-0054

Site Address: St. David's Boys N.S, Kilmore Road, Artane, Dublin 5

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0055

Site Address: St. Paul's Special School, Beaumont Woods, Beaumont, Dublin 5

Draft Plan Zoning: Z1

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of school sites in the city from Z15 and other zoning designations to Z12. For this particular site, the submission seeks rezoning from Z1 to Z12. The submission notes that school sites are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on-site with no envisaged expansion plans or future requirements. It is stated that the current zoning objectives unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

In relation to the subject site, it is recommended that the site is rezoned from Z1 to Z15 in order protect educational uses in the area.

A detailed response to the matter of wider educational use and future need is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Chief Executives Recommendation

Rezone to Z15.

Map Reference: B-0056

Site Address: St. Vincent de Paul, Griffith Avenue, Dublin 9

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this church site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services in the area. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

The site sought for rezoning comprises a church fronting onto Griffith Avenue and its adjoining car park. The church provides important religious and community services to the local area to which it serves. The development potential of the site is considered limited and would likely require demolition of the existing church building or substantial reconfiguration of the site in order to accommodate a meaningful development.

The existing use on the site is considered important social and community infrastructure, and having regard to the finite nature of such lands, it is considered appropriate that they are retained for such use. The CE is of the view that church buildings such as this one can potentially be utilised for a variety of ecclesiastical and community purposes. In addition, it is noted that Z15 allows consideration for a number of residential institutional uses and assisted living/retirement accommodation. Should the existing church use become unviable or no longer needed by the Diocese, the opportunity remains to seek a variation to the plan in accordance with the provisions of the zoning objective. As such, in the absence of clear development objectives for the site by the Diocese, the rezoning of the site to Z12 would be premature and would result in a potential loss of community amenities and facilities in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0057

Site Address: The Church of the Nativity of Our Lord, Montrose Park, Beaumont, Dublin 5

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this church site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services in the area. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

The site sought for rezoning comprises a church at Montrose Park, Beaumont. The church provides important religious and community services to the local area to which it serves. The development potential of the site is considered limited and would likely require demolition of the existing church building or substantial reconfiguration of the site in order to accommodate a meaningful development.

The existing use on the site is considered important social and community infrastructure, and having regard to the finite nature of such lands, it is considered appropriate that they are retained for such use. The CE is of the view that church buildings such as this one can potentially be utilised for a variety of ecclesiastical and community purposes. In addition, it is noted that Z15 allows consideration for a number of residential institutional uses and assisted living/retirement accommodation. Should the existing church use become unviable or no longer needed by the Diocese, the opportunity remains to seek a variation to the plan in accordance with the provisions of the zoning objective. As such, in the absence of clear development objectives for the site by the Diocese, the rezoning of the site to Z12 would be premature and would result in a potential loss of community amenities and facilities in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0058

Site Address: Tolka House Pub, Glasnevin Hill, Dublin 9

Draft Plan Zoning: Z1

Requested Zoning: Not Specified

CE Recommended Zoning: Z3/Z9

Summary:

The submission from the OPW sought a change in the residential zoning of the car park associated with the Tolka House pub on account of its location in Flood Zone B.

Chief Executive's Response:

The Chief Executive acknowledges that the car park in Tolka House pub is zoned residential (Z1) and is located in Flood Zone B. The area behind the Tolka Pub is behind a recently constructed flood wall.

Having regard to the character and location public house fronting Glasnevin Hill a Z3 (Neighbourhood Centre) zoning is considered appropriate for the building while Z9 (Open Space) would be a more suitable zoning for the adjoining car park given the flood risk.

Chief Executive's Recommendation:

Rezone to Z3/Z9 (see also CE response to OPW submission).

Map Reference: B-0059

Site Address: Virgin Mary Boys NS, Shangan Road, Ballymun, Dublin 9

Draft Plan Zoning: Z15/Z1

Requested Zoning: Z12

CE Recommended Zoning: Z15/Z1

Summary

A submission seeks the rezoning of this school site from Z15 and Z1 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. A small portion of the lands are zoned Z1 to tie in with future site block alignments in the Ballymun Local Area Plan.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 and Z1 to protect the essential community and social infrastructure role that it serves in the area and to support the implementation of the Ballymun LAP.

Chief Executive's Recommendation

Retain Z15 and Z1 zoning.

Map Reference: B-0059

Site Address: Virgin Mary Girls NS, Shangan Road, Ballymun, Dublin 9

Draft Plan Zoning: Z15/Z1

Requested Zoning: Z12

CE Recommended Zoning: Z15/Z1

Summary

A submission seeks the rezoning of this school site from Z15 and Z1 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. A small portion of the lands are zoned Z1 to tie in with future site block alignments in the Ballymun Local Area Plan.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 and Z1 to protect the essential community and social infrastructure role that it serves in the area and to support the implementation of the Ballymun LAP.

Chief Executive's Recommendation

Retain Z15 and Z1 zoning.

Map Reference: B-0060

Site Address: Woodlands, Clonshaugh Road, Dublin 17

Draft Plan Zoning: Z6/Z12

Requested Zoning: Z1

CE Recommended Zoning: Z6/Z12

Summary

This submission requests a change in the relevant zoning of Woodlands House and surrounds from Z12 to Z1 and of adjoining undeveloped lands to the south from Z6 to Z1, both in order to facilitate their residential redevelopment. The rezoning of the Woodlands House lands from Z12 to Z1 is considered appropriate on the basis that the property has been in longstanding residential use and never in institutional use. In addition, concerns are expressed in respect to the likely net development potential of the site under the Z12 zoning objective, given the 25% open space requirement and the implications of policy BHA9 (Conservation Areas). The submission also notes that the utility/ potential of the Z6 zoned lands to support enterprise and employment generation is limited and their residential redevelopment would be in keeping with planned transport infrastructure upgrades and the general pattern of residential redevelopment in the wider north fringe area.

Chief Executive's Response

On foot of objective CEE04 of the current Dublin City Development Plan 2016-2022, a detailed review of all Z6 zoned lands in the city was undertaken to determine which lands had redevelopment potential and would be suitable for a change in zoning to facilitate more compact growth. The CE considers that the remaining Z6 land bank, which includes the Clonshaugh Business and Technology Park, represents the core strategic employment lands in the city. Such lands are an important asset for the city and provide an important employment function in the north fringe area and on this basis, it would be inappropriate to rezone the subject site to Z1.

Woodlands House, curtilage and surrounds is a longstanding domain landscape in the city and incorporates a protected monument. The lands are also subject to a conservation area designation. Having regard to the conservation and potential archaeological value of the lands, together with their historic use, it is recommended that these lands remain Z12 as this zoning is the most appropriate zoning objective for this particular, unique location; to ensure the protection of the key existing landscape character elements of the lands.

Chief Executive's Recommendation

Retain Z6/Z12 zoning.

Map Reference: B-0061

Site Address: Kilmore Road, Artane, Dublin 5

Draft Plan Zoning: Z4

Requested Zoning: Z4

CE Recommended Zoning: Z4

Summary

A submission was received supporting the zoning of the subject site at Kilmore Road as Z4 on the basis of the potential for higher density mixed-use development, urban consolidation and the regeneration of Artane as a key neighbourhood/ urban village.

Chief Executive's Response

The Z4 zoning of the subject site is deemed appropriate.

Chief Executive's Recommendation

Retain Z4 zoning.

Map Reference: B-0062

Site Address: Scoil Chiaran, St. Canice's Road, Glasnevin, Dublin 11

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0068
Site Address: Glasnevin Convent
Draft Plan Zoning: Z15/Z9
Requested Zoning: Z9
CE Recommended Zoning: Z12/Z9

Summary

A submission requests that the zoning of the Convent grounds in Glasnevin and lands adjacent to the river remain are designated as Z9.

Chief Executive's Response

The Holy Faith Convent and retreat centre in Glasnevin is a complex of institutional buildings, one of which are on the RPS (with others by association form part of the curtilage). It is a separate site to the existing St. Mary's Secondary School adjoining. These lands and buildings have potential to provide in the future a redevelopment opportunity to provide new housing, repurposing of the protected buildings and also open up a new area of parkland along the banks of the Tolka River that can ultimately aid the implementation of the Tolka greenway. These lands along the north bank of the River Tolka form part of the river's designated conservation area and are zoned Z9 as per the 2016-2022 Dublin City Development Plan. The Draft Plan recommends no change to this Z9 zoning.

It is considered that a change to the zoning of the convent buildings and associated grounds to Z12 would enable sensitive re-use of the protected buildings which are not in public use; provide new infill housing and provide a significant new asset of open space through the combination of Z9 lands and the open space requirements of the Z12 zoning that would be a public benefit to the area, opening up access to the Tolka at this location.

Chief Executive's Recommendation

It is recommended to retain as Z9 the lands currently zoned Z9 and to change the lands on the northern portion of the lands from Z15 to Z12.

Map Reference: B-0069

Site Address: St. Paul's Junior NS, Ard na Greine Ayrfield, Malahide Road, Dublin 13

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0069

Site Address: St. Paul's Senior NS, Ayrfield, Malahide Road, Dublin 13

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: B-0070

Site Address: Corpus Christi Church, Home Farm Road, Drumcondra, Dublin 9

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this church site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services in the area. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

The site sought for rezoning comprises a church on the southern side of Griffith Avenue. The church provides important religious and community services to the local area to which it serves. The development potential of the site is considered limited and would likely require demolition of the existing church building or substantial reconfiguration of the site in order to accommodate a meaningful development.

The existing use on the site is considered important social and community infrastructure, and having regard to the finite nature of such lands, it is considered appropriate that they are retained for such use. The CE is of the view that church buildings such as this one can potentially be utilised for a variety of ecclesiastical and community purposes. In addition, it is noted that Z15 allows consideration for a number of residential institutional uses and assisted living/retirement accommodation. Should the existing church use become unviable or no longer needed by the Diocese, the opportunity remains to seek a variation to the plan in accordance with the provisions of the zoning objective. As such, in the absence of clear development objectives for the site by the Diocese, the rezoning of the site to Z12 would be premature and would result in a potential loss of community amenities and facilities in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map C

| Site Address | Draft Plan Zoning | Requested Zoning | CE Recommendation | Map Sheet | Map Reference |
|---|-------------------|------------------|-------------------|-----------|---------------|
| Circle K, Foxhall, Howth Road, Raheny | Z1 | Z3 | Z3 | Map C | C-0001 |
| St. Francis Hospice, Raheny | Z15 / Z1 | Z15 | Z15 | Map C | C-0002 |
| St. Benedict, Grange Park View, Dublin 5 | Z15 | Z12 | Z15 | Map C | C-0003 |
| St. Benedict's and St. Mary's NS, Grange Park, Raheny, Dublin 5 | Z15 | Z12 | Z15 | Map C | C-0003 |
| Our Lady Mother of Divine Grace, Howth Road, Raheny, Dublin 5 | Z4 / Z15 | Z12 | Z4/ Z15 | Map C | C-0004 |
| Holy Trinity Senior NS, Grange Road, Donahmede, Dublin 13 | Z15 | Z12 | Z15 | Map C | C-0005 |
| Scoil Bhride Junior, Grange Road, Donaghmede, Dublin 13 | Z15 | Z12 | Z15 | Map C | C-0005 |
| Scoil Cholmcille Senior, Newbrook Road, Donaghmede, Dublin 13 | Z15 | Z12 | Z15 | Map C | C-0007 |
| St. Francis of Assisi Primary School, Belmayne, Balgriffin, Dublin 13 | Z15 | Z12 | Z15 | Map C | C-0008 |
| St. Kevin's Junior NS, Newbrook Avenue, Donaghmede, Dublin 13 | Z15 | Z12 | Z15 | Map C | C-0009 |
| St. Eithne's Girls NS, Edenmore, Raheny, Dublin 5 | Z15 | Z12 | Z15 | Map C | C-0010 |
| St. Monica's Infant Girls NS, Edenmore, Raheny, Dublin 5 | Z15 | Z12 | Z15 | Map C | C-0010 |
| St. Malachy's Boys NS, Edenmore, Raheny, Dublin 5 | Z15 | Z12 | Z15 | Map C | C-0011 |

| | | | | | |
|--|-----|-----|-----|-------|--------|
| Gaelscoil Mide, Br. An Ghleanntain Ghlais Cill Bharrog Baile Atha Cliath 5 | Z15 | Z12 | Z15 | Map C | C-0014 |
| Scoil Eoin, Greendale Road, Kilbarrack, Dublin 5 | Z15 | Z12 | Z15 | Map C | C-0015 |
| Naiscoil IDE, All Saints Drive, Raheny Dublin 5 | Z15 | Z12 | Z15 | Map C | C-0016 |
| Scoil Aine, All Saints Drive, Raheny, Dublin 5 | Z15 | Z12 | Z15 | Map C | C-0016 |
| Scoil Assaim BNS, All Saints Drive, Rahney, Dublin 5 | Z15 | Z12 | Z15 | Map C | C-0016 |
| Site adjoining Clongriffin Train Line | Z14 | Z15 | Z15 | Map C | C-0021 |

Map Reference: C-0001

Site Address: Circle K, Foxhall, Howth Road, Raheny

Draft Plan Zoning: Z1

Requested Zoning: Z3

CE Recommended Zoning: Z3

Summary

A submission seeks the rezoning of Circle K Foxhall service station located at Howth Road, Raheny, Dublin 5 from Z1 to Z3 on basis of the established/ permitted commercial use and its ongoing operation/ future development potential.

Chief Executive's Response

It is considered that the Z3 zoning objective is the appropriate zoning for the site having regard to the existing established local service uses on the site and the potential for future development to cater for local neighbourhood needs under the Z3 zoning objective.

Chief Executive's Recommendation

Rezone to Z3.

Map Reference: C-0002

Site Address: St. Francis Hospice, Raheny

Draft Plan Zoning: Z15 / Z1

Requested Zoning: Z15

CE Recommended Zoning: Z15

Summary

A submission seeks the continuation and expansion of the Z15 zoning objective at St. Francis Hospice, Raheny to include the entire Hospice lands i.e. Walmer Villa, currently zoned Z1, in order to facilitate the development of enhanced hospice facilities and safeguard existing uses.

Chief Executive's Response

It is considered that a Z15 zoning objective is the appropriate zoning for the overall hospice lands having regard to the existing established uses at the site and the potential for future development under the Z15 zoning objective, such as for enhanced hospice facilities or similar community and social infrastructure use.

Chief Executive's Recommendation

Rezone to Z15.

Map Reference: C-0003

Site Address: St. Benedict's Church, Grange Park View, Dublin 5

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this church site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services in Walkinstown. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

The site sought for rezoning accommodates a substantial church structure which adjoins an area of open space. The development potential of the site is considered limited and would likely require demolition of the existing church building or substantial reconfiguration of the site in order to accommodate a meaningful redevelopment.

The existing uses on this site are considered important social and community infrastructure, and having regard to the finite nature of such lands, it is considered appropriate that they are retained for such use. The CE is of the view that church buildings such as this one can potentially be utilised for a variety of ecclesiastical and community purposes. In addition, it is noted that Z15 allows consideration for a number of residential institutional uses and assisted living/retirement accommodation. Should the existing church use become unviable or no longer needed by the Diocese, the opportunity remains to seek a variation to the plan in accordance with the provisions of the zoning objective. As such, in the absence of clear development objectives for the site by the Diocese, the rezoning of the site to Z12 would be premature and would result in a loss of community amenities and facilities in the area.

Chief Executive's Recommendation

Retain Z15 Zoning.

Map Reference: C-0003

Site Address: St. Benedict's and St. Mary's NS, Grange Park, Raheny, Dublin 5

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A full response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department requests specific protection of the curtilage of school sites.

The subject site is associated with the Church addressed under C-0003. The combination of community facilities and open space at this location creates an important hub of community and social infrastructure.

As such, having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Raheny area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 Zoning.

Map Reference: C-0004

Site Address: Our Lady Mother of Divine Grace, Howth Road, Raheny, Dublin 5

Draft Plan Zoning: Z15 / Z4

Requested Zoning: Z12

CE Recommended Zoning: Z15 / Z4

Summary

A submission seeks the rezoning of this church site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

The subject site comprises of a Z15 zoned lands to the east and Z4 zoned lands to the west. The Z15 zoned lands accommodate a substantial church structure, while the Z4 zoned lands accommodate a large surface car park associated with the church.

It is considered that there is limited potential for any future development within the Z15 zoned lands given the scale of the church building. Any future development would therefore likely require demolition of the existing church building or substantial reconfiguration of the site in order to accommodate a meaningful infill development.

The existing use on the Z15 zoned lands this site is considered important social and community infrastructure, and having regard to the finite nature of such lands, it is considered appropriate that they are retained for such use. The CE is of the view that church buildings such as this one can potentially be utilised for a variety of ecclesiastical and community purposes. In addition, it is noted that Z15 allows consideration for a number of residential institutional uses and assisted living/retirement accommodation. Should the existing church use become unviable or no longer needed by the Diocese, the opportunity remains to seek a variation to the plan in accordance with the provisions of the zoning objective. As such, in the absence of clear development objectives for the site by the Diocese, the rezoning of the site to Z12 would be premature and would result in a loss of community amenities and facilities in the area.

The associated surface level car park however, is located within Z4 zoned lands where there is significant potential for infill development. Given the location of the site within Raheny Village, it is appropriate to retain this Z4 zoning to protect the development potential of the site and support its role as an Urban Village serving the area.

Chief Executive's Recommendation

Retain Z15/ Z4 Zoning.

Map Reference: C-0005

Site Address: Holy Trinity Senior NS, Grange Road, Donaghmede, Dublin 13

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A full response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Donaghmede area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the Donaghmede area.

Chief Executive's Recommendation

Retain Z15 Zoning.

Map Reference: C-0005

Site Address: Scoil Bhride Junior, Grange Road, Donaghmede, Dublin 13

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A full response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Donaghmede area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the Donaghmede area, (see also C-0007 and C-0009)

Chief Executive's Recommendation

Retain Z15 Zoning.

Map Reference: C-0007

Site Address: Scoil Cholmcille Senior, Newbrook Road, Donaghmede, Dublin 13

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A full response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Donaghmede area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the Donaghmede area (see also C-0005 and C-0009)

Chief Executive's Recommendation

Retain Z15 Zoning.

Map Reference: C-0008

Site Address: St. Francis of Assisi Primary School, Belmayne, Balgriffin, Dublin 13

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A full response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department requests specific protection of the curtilage of school sites.

The subject site is located within the Clongriffin / Belmayne area which is designated as an area for strategic development and regeneration, SDRA. The provision of school and community facilities is essential to the development of the SDRA, as neighbourhoods are completed over the next four years.

As such, having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Dublin 13 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 Zoning.

Map Reference: C-0009

Site Address: St. Kevin's Junior NS, Newbrook Avenue, Donaghmede, Dublin 13

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A full response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Donaghmede area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the Donaghmede area (see also C-0005 and C-0007)

Chief Executive's Recommendation

Retain Z15 Zoning.

Map Reference: C-0010

Site Address: St. Eithne's Girls NS, Edenmore, Raheny, Dublin 5

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A full response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department requests specific protection of the curtilage of school sites.

The subject site is located on the north side of Woodbine Road. The site forms part of a wider Z15 area, comprising of St. Monica's Girls National School and adjoining a nursing home to the north. The site is also located opposite St. Malachy's Boys National School and St. Monica's GAA Club and Grounds to the south of Woodbine Road (see C-0011). The wider Z15 lands comprise of schools, nursing homes, church's and sports clubs, all of which provide for necessary community related activities in line with the 15 minute city objective.

As such, having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Raheny area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 Zoning.

Map Reference: C-0010

Site Address: St. Monica's Infants Girls NS, Edenmore, Raheny, Dublin 5

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A full response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department requests specific protection of the curtilage of school sites.

The subject site is located on the north side of Woodbine Road. The site forms part of a wider Z15 area, comprising of St. Eithne's Girls National School and adjoining a nursing home to the north. The site is also located opposite St. Malachy's Boys National School and St. Monica's GAA Club and Grounds to the south of Woodbine Road (see C-0011). The wider Z15 lands comprise of schools, nursing homes, church's and sports clubs, all of which provide for necessary community related activities in line with the 15 minute city objective.

As such, having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Raheny area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 Zoning.

Map Reference: C-0011

Site Address: St. Malachy's Boys NS, Edenmore, Raheny, Dublin 5

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A full response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department requests specific protection of the curtilage of school sites.

The subject site is located within a larger Z15 complex that adjoins a significant area of Z9 public amenity space. The site is located to the south of St. Monica's and St. Eithne's Girls National Schools, see C-0010. The wider Z15 lands comprise of schools, nursing homes, church's and sports clubs, all of which provide for necessary community related activities in line with the 15 minute city objective.

As such, having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Raheny area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 Zoning.

Map Reference: C-0014

Site Address: Gaelscoil Mide, Br. An Ghleanntain Ghlais Cill Bharrog Baile Atha Cliath 5

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A full response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department requests specific protection of the curtilage of school sites.

The subject site adjoins Z4 zoned lands which form Killbarrack Neighbourhood Centre. The location of the site forms part the local services and social and community infrastructure serving the area (see also C-0015).

As such, having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Dublin 5 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 Zoning.

Map Reference: C-0015

Site Address: Scoil Eoin, Greendale Road, Kilbarrack, Dublin 5

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A full response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department requests specific protection of the curtilage of school sites.

The subject site adjoins Z4 zoned lands which form Killbarrack Neighbourhood Centre. The location of the site forms part the local services and social and community infrastructure serving the area (see also C-0014).

As such, having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Kilbarrack area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 Zoning.

Map Reference: C-0016

Site Address: Naiscoil IDE, All Saints Drive, Raheny, Dublin 5

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A full response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department requests specific protection of the curtilage of school sites.

The subject site is located within a school complex to the north of St. Anne's Park. The school complex contributes to the social and community infrastructure in the area.

As such, having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Raheny area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 Zoning.

Map Reference: C-0016

Site Address: Scoil Aine, All Saints Drive, Raheny, Dublin 5

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A full response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department requests specific protection of the curtilage of school sites.

The subject site is located within a school complex to the north of St. Anne's Park. The school complex contributes to the social and community infrastructure in the area.

As such, having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Raheny area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 Zoning.

Map Reference: C-0016

Site Address: Scoil Assaim BNS, All Saints Drive, Raheny, Dublin 5

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A full response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department requests specific protection of the curtilage of school sites.

The subject site is located within a school complex to the north of St. Anne's Park. The school complex contributes to the social and community infrastructure in the area.

As such, having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Raheny area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 Zoning.

Map Reference: C-0021

Site Address: Site adjoining Clongriffin Train Line

Draft Plan Zoning: Z14

Requested Zoning: Z15

CE Recommended Zoning: Z15

Summary

The Department of Education made a submission seeking that lands a Clongriffin be safeguarded for a future primary school, adjoining Clongriffin Train Station. The submission acknowledges that four schools in the area have been established to meet the targeted population of c. 20,000-25,000 as set out in the LAP. The LAP sets out a further site for potential future primary school adjoining Clongriffin Train Station. However, an application was lodged on the lands in 2019 for residential development. The application was refused planning permission as An Bord Pleanála considered that there was not sufficient justification to set aside the reservation of the site for a school and contended that the lands shall be retained for a period of 5 years for potential use as a school site.

In this regard, the Department of Education is seeking a rezoning of the lands from Z14 to Z15 to protect the future potential for a school on the subject site.

Chief Executive's Response

Schools and education facilities are essential social infrastructure for new and existing city neighbourhoods. National policy highlights the importance of aligning demographics with educational provision. Having regard to the projected residential development in the area under the Draft Plan at SDRA 1 Clongriffin/Belmayne (est.6,950-7,350); to the identified need for a new school site in the SDRA (page 473); and to the stated lack of capacity of primary schools in Belmayne as highlighted by the Dept. of Education in their submission; it is considered appropriate to rezone the lands in question to Z15, to facilitate the development of future community and social infrastructure use to support surrounding communities and future residential development.

Chief Executive's Recommendation

Rezone to Z15.

Map D

| Site Address | Draft Plan Zoning | Requested Zoning | CE Recommendation | Map Sheet | Map Reference |
|---|-------------------|------------------|-------------------|-----------|---------------|
| Kerrmore House, Goldenbridge Industrial Estate, Tyrconnell Road, Inchicore, Dublin 8 | Z9 | Z10 | Z9 | Map D | D-0001 |
| Clayton Love site / Former John O'Brien Freezer Foods Site, Jamestown Road, Inchicore, Dublin 8 | Z6 | Z10 | Z6 | Map D | D-0002 |
| Allied Industrial Estate, Kylemore Road | Z6 | Z1 | Z6 | Map D | D-0003 |
| Chapelizod Bypass / Rossmore Drive, Kylemore Road, Dublin 20 | Z6 | Z10 | Z10 | Map D | D-0004 |
| Goldenbridge Industrial Estate | Z9/ Z10 | Z10 | Z9/ Z10 | Map D | D-0005 |
| St. Gabriel's NS, Dominican Campus Ballyfermot, Dublin 10 | Z15 | Z12 | Z15 | Map D | D-0006 |
| St. Michael's NS, Kylemore Rad, Ballyfermot, Dublin 10 | Z15 | Z12 | Z15 | Map D | D-0006 |
| St. Raphael's NS, Kylemore Road, Ballyfermot, Dublin 10 | Z15 | Z12 | Z15 | Map D | D-0006 |
| Mary Queen of Angels BNS (1), Gurteen Road, Ballyfermot, Dublin 10 | Z15 | Z12 | Z15 | Map D | D-0009 |
| Mary Queen of Angels BNS (2), Gurteen Road, Ballyfermot, Dublin 10 | Z15 | Z12 | Z15 | Map D | D-0009 |
| St. Louise de Marillac NS, Drumfinn Road, Ballyfermot, Dublin 10 | Z15 | Z12 | Z15 | Map D | D-0010 |
| Our Lady of the Wayside NS, Bluebell Road, Bluebell, Dublin 12 | Z1 | Z12 | Z15 | Map D | D-0011 |
| St. Patricks NS, Chapelizod Village, Dublin 20 | Z1 | Z12 | Z15 | Map D | D-0012 |

| | | | | | |
|---|-----|--------------------|-----|-------|--------|
| St. Ultan's National School, Cherry Orchard, Ballyfermot, Dublin 10 | Z15 | Z12 | Z15 | Map D | D-0013 |
| Scoil Mhuire han Smal, Tyrconnell Road, Inchicore, Dublin 8 | Z15 | Z12 | Z15 | Map D | D-0014 |
| St. Vincent's Special NS, Navan Road, Dublin 7 | Z15 | Z12 | Z15 | Map D | D-0015 |
| 86, 90-96 Jamestown Road, Dublin 8 | Z10 | Z1 | Z10 | Map D | D-0016 |
| Jamestown Industrial Centre and HG Ritchie Co., Jamestown Road, Inchicore | Z6 | Z10 or Z1 / Z14 | Z6 | Map D | D-0017 |
| Kylemore Road / Parkwest Road and Inchicore Works and Lads East of Kylemore Road | Z6 | Z14 | Z6 | Map D | D-0018 |

Map Reference: D-0001

Site Address: Kerrmore House, Goldenbridge Industrial Estate, Tyrconnell Road, Inchicore, Dublin 8

Draft Plan Zoning: Z9

Requested Zoning: Z10

CE Recommended Zoning: Z9

Summary

A submission seeks the rezoning of Kerrmore House, Goldenbridge Industrial Estate, Tyrconnell Road, Inchicore, Dublin 8 from Z9 to Z10 on the basis of the sites regeneration/redevelopment potential and potential to contribute to the local streetscape on Tyrconnell Road. The submission states that the Z9 zoning is non-conforming, inappropriate and not in keeping with the approach to the site set out in Variation No.16 to the 2016-2022 Development Plan.

Chief Executive's Response

Variation 16 of the current Dublin City Development Plan 2016-2022 sought the rezoning of the wider Goldenbridge Industrial Estate from Z6 to Z10. As a result of further review as part of the Draft Plan, part of the Z10 zoning specifically along the culverted Camac River has been rezoned to Z9. The Z9 zoning seeks to bring forward an objective for River Restoration at this location in accordance with Policy SI11 – see also D-0005.

As such, in order to ensure the River Restoration Policy can be delivered, it is recommended that the subject lands be retained as Z9.

Chief Executive's Recommendation

Retain Z9 zoning.

Map Reference: D-0002

Site Address: Clayton Love site / Former John O'Brien Freezer Foods Site, Jamestown Road, Inchicore, Dublin 8

Draft Plan Zoning: Z6

Requested Zoning: Z10

CE Recommended Zoning: Z6

Summary

A submission seeks the rezoning of the Clayton Love site / former John O'Brien Freezer Foods site (respectively) at Jamestown Road, Inchicore, Dublin 8 from Z6 to Z10 on the basis of lands location contiguous to existing residential areas, Inchicore Village, and directly proximate to an existing Luas stop.

Chief Executive's Response

The Draft Plan supports the future development of the wider Naas Road lands area, incorporating parts of Park West and lands in South Dublin County Council, and are the subject of a master planning process funded under the Urban Regeneration and Development Fund (URDF) programme (City Edge Project). It is anticipated that this will result in a statutory plan coming forward that, if necessary to inform a variation to the Development Plan.

CSO2 of the Draft Plan states that it is an objective of the City Council:

"To prepare a local statutory plan in conjunction with South Dublin County Council for lands at Kylemore Road/Naas Road and Ballymount lands to enable a co-ordinated and phased development on these lands over the medium to long term."

As such, it is considered that the rezoning of the lands is premature pending the completion of the City Edge Project in accordance with Objective CSO2.

Chief Executive's Recommendation

Retain Z6 zoning.

Map Reference: D-0003

Site Address: Allied Industrial Estate, Kylemore Road

Draft Plan Zoning: Z6

Requested Zoning: Z1

CE Recommended Zoning: Z6

Summary

A submission requests that the area around Kylemore Road area currently zoned Z6, should be reconsidered in line with the overall strategy for the area and should be rezoned Z1.

Chief Executive's Response

The Draft Plan supports the future development of the wider Naas Road lands area, incorporating parts of Park West and lands in South Dublin County Council, and are the subject of a master planning process funded under the Urban Regeneration and Development Fund (URDF) programme (City Edge Project). It is anticipated that this will result in a statutory plan coming forward that, if necessary to inform a variation to the Development Plan.

CSO2 of the Draft Plan states that it is an objective of the City Council:

“To prepare a local statutory plan in conjunction with South Dublin County Council for lands at Kylemore Road/Naas Road and Ballymount lands to enable a co-ordinated and phased development on these lands over the medium to long term.”

As such, it is considered that the rezoning of the lands is premature pending the completion of the City Edge Project in accordance with objective CSO2.

Chief Executive's Recommendation

Retain Z6 zoning.

Map Reference: D-0004

Site Address: Chapelizod Bypass / Rossmore Drive, Kylemore Road, Dublin 20

Draft Plan Zoning: Z6

Requested Zoning: Z10

CE Recommended Zoning: Z10

Summary

A submission was received seeking the rezoning of the subject lands at Chapelizod Bypass/Rossmore Drive, Kylemore Road, from Z6 to Z10 on the basis of their strategic location relative to services, amenities and the city centre. It is stated that the lands have regeneration potential to deliver a high-quality mixed-use scheme with a large residential component.

Chief Executive's Response

The subject lands are located in a highly accessible area in close proximity to Chapelizod Village, with good public transport links to the city centre. The subject lands are considered suitable for mixed use development given the location of the site within an established residential area to the west and east, and Z6 commercial/ employment lands to the north. The rezoning of the lands to Z10 will act as a buffer between the residential and employment uses and will contribute to the 15 minute city objective. The lands are well served by open space and amenity and are considered suitable for mixed use redevelopment.

Chief Executive's Recommendation

Rezone to Z10.

Map Reference: D-0005

Site Address: Goldenbridge Industrial Estate

Draft Plan Zoning: Z9 / Z10

Requested Zoning: Z10

CE Recommended Zoning: Z9 / Z10

Summary

A submission was made in support of the Z10 zoning for the Goldenbridge Industrial Estate. The requirement for a masterplan for these lands was also welcomed. The submission also supported the proposed / improved public open space along the River Camac near the Grand Canal connection.

Chief Executive's Response

Variation 16 of the current Dublin City Development Plan 2016-2022 sought the rezoning of the lands in question from Z6 to Z10. As a result of further review as part of the Draft Plan, part of the Z10 zoning specifically along the culverted Camac River has been rezoned to Z9. The Z9 zoning seeks to bring forward an objective for River Restoration at this location in accordance with Policy SI11 – see also D-0001.

The CE welcomes the submission in support of the Z10 zoning and recommends no change to the zoning of the lands.

Chief Executive's Recommendation

Retain as Z9/ Z10.

Map Reference: D-0006

Site Address: St. Gabriel's NS, Dominican Campus, Ballyfermot, Dublin 10

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A full response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site, in particular, any evidence as to why the Ballyfermot area may not need it in the future, it is considered that the site should remain zoned Z15 to protect the essential community and social infrastructure role that they serve.

The subject lands form part of a wider landholding of community and social infrastructure, which comprise of a number of schools and related facilities. As such, having regard to the need to protect such uses in the city, the site is recommended to remain as Z15.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: D-0006

Site Address: St. Michael's NS, Kylemore Road, Ballyfermot, Dublin 10

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A full response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site, in particular, any evidence as to why the Ballyfermot area may not need it in the future, it is considered that the site should remain zoned Z15 to protect the essential community and social infrastructure role that they serve.

The subject lands form part of a wider landholding of community and social infrastructure, which comprise of a number of schools and related facilities. As such having regard to the need to protect such uses in the city, the site is recommended to remain as Z15.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: D-0006

Site Address: St. Raphael's NS, Kylemore Road, Ballyfermot, Dublin 10

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A full response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site, in particular, any evidence as to why the Ballyfermot area may not need it in the future, it is considered that the site should remain zoned Z15 to protect the essential community and social infrastructure role that they serve.

The subject lands form part of a wider landholding of community and social infrastructure, which comprise of a number of schools and related facilities. As such having regard to the need to protect such uses in the city, the site is recommended to remain as Z15.

Chief Executive's Recommendation:

Retain Z15 zoning.

Map Reference: D-0009

Site Address: Mary Queen of Angels BNS (1) and (2), Gurteen Road, Ballyfermot, Dublin 10

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A full response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site, in particular, any evidence as to why the Ballyfermot area may not need it in the future, it is considered that the site should remain zoned Z15 to protect the essential community and social infrastructure role that they serve.

The subject sites forms part of a large education complex with further educational lands located to the north of the site, see D-0010. Having regard to the significant regeneration in the wider area, it is considered that the need for educational facilities will increase in the future and as such the Z15 zoning is recommended to be retained.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: D-0010

Site Address: St. Louise de Marillac NS, Drumfinn Road, Ballyfermot, Dublin 10

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A full response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site, in particular, any evidence as to why the Ballyfermot area may not need it in the future, it is considered that the site should remain zoned Z15 to protect the essential community and social infrastructure role that they serve.

The subject site forms part of a large education complex with further educational lands located to the north of the site, see D-0009. Having regard to the significant regeneration in the wider area, it is considered that the need for educational facilities will increase in the future and as such the Z15 zoning is recommended to be retained.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: D-0011

Site Address: Our Lady of the Wayside NS, Bluebell Road, Bluebell, Dublin 12

Draft Plan Zoning: Z1

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

The subject site is in operation as a local national school, and the zoning of the site is Z1 "to protect, provide and improve residential amenities". Having regard to the submission from the Department of Education which highlights the challenges to the Department in developing schools in the city and seeking the strong and explicit support from the City Council regarding the protection of school sites in the city, and the review of the existing City Development Plan whereby the future broader community importance of Z15 lands is emphasised, it is recommended that the lands are zoned Z15 in order to protect the ongoing continued operation of the school on the subject lands.

Chief Executive's Recommendation

Rezone to Z15 zoning.

Map Reference: D-0012

Site Address: St. Patricks NS, Chapelizod Village, Dublin 20

Draft Plan Zoning: Z1

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

The subject site is in operation as a local national school, and the zoning of the site is Z1 "to protect, provide and improve residential amenities". Having regard to the submission from the Department of Education which highlights the challenges to the Department in developing schools in the city and seeking the strong and explicit support from the City Council regarding the protection of school sites in the city, and the review of the existing City Development Plan whereby the future broader community importance of Z15 lands is emphasised, it is recommended that the lands are zoned Z15 in order to protect the ongoing continued operation of the school on the subject lands.

Chief Executive's Recommendation

Rezone to Z15.

Map Reference: D-0013

Site Address: St. Ultan's National School, Cherry Orchard, Ballyfermot, Dublin 10

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A full response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site, in particular, any evidence as to why the Ballyfermot area may not need it in the future, it is considered that the site should remain zoned Z15 to protect the essential community and social infrastructure role that they serve.

The site is located within an area of surrounding institutional and community uses as well as a significant public park zoned Z9. The combination of the Z9 and Z15 zoning provide for much needed local amenities, such as school, parks, playing pitches as such the Z15 zoning should be retained.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: D-0014

Site Address: Scoil Mhuire Gan Smal, Tyrconnell Road, Inchicore, Dublin 8

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A full response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site, in particular, any evidence as to why the Inchicore area may not need it in the future, it is considered that the site should remain zoned Z15 to protect the essential community and social infrastructure role that they serve.

The subject site forms part of a larger Z15 area within Inchicore village, The provision of schools and community facilities within village centres is in keeping with the objective for the 15 Minute City and as such the Z15 zoning should be retained.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: D-0015

Site Address: St. Vincent's Special NS, Navan Road, Dublin 7

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A full response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site, in particular, any evidence as to why the Dublin 7 area may not need it in the future, it is considered that the site should remain zoned Z15 to protect the essential community and social infrastructure role that they serve.

The subject lands form part of a wider landholding of community and social infrastructure, which comprise of a hospital, sports ground and surrounding open spaces. As such having regard to the need to protect such uses in the city, the site is recommended to remain as Z15.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: D-0016

Site Address: 86, 90-96 Jamestown Road, Dublin 8

Draft Plan Zoning: Z10

Requested Zoning: Z1

CE Recommended Zoning: Z10

Summary

A submission was made seeking the amendment of the zoning of lands at Jamestown Road from Z10 to Z1 on the basis that the subject lands are more appropriate for residential development. It is submitted that the subject lands are relatively small in size to accommodate the Z10 zoning objective “to consolidate and facilitate the development of inner city and inner suburban sites for mixed use” and, therefore, considers that Z1 “to protect, provide and improve residential amenities” would be more appropriate. It was submitted that the Z1 zoning would help to reinforce and complement the future rezoning of the employment Z6 corridor to the west.

Chief Executive’s Response

The subject lands are located on the east end of Jamestown Road in close proximity to Inchicore Village. This area comprises of two main zoning objectives, Z1 and Z6. The subject site is located between Z6 lands to the west and Z1 lands to the east. It is considered that the Z10 zoning designation on the site which provides for mixed use development provides an appropriate transitional zoning between the Z6 employment use and Z1 residential use. The Z10 zoning allows for a wider variety of uses including residential as requested in the submission.

The Draft Plan supports the future development of the wider Naas Road lands area, incorporating parts of Park West and lands in South Dublin County Council, and are the subject of a master planning process funded under the Urban Regeneration and Development Fund (URDF) programme (City Edge Project). It is anticipated that this will result in a statutory plan coming forward that, if necessary to inform a variation to the Development Plan.

CSO2 of the Draft Plan states that it is an objective of the City Council:

To prepare a local statutory plan in conjunction with South Dublin County Council for lands at Kylemore Road/Naas Road and Ballymount lands to enable a co-ordinated and phased development on these lands over the medium to long term.

As such it is considered that the rezoning of the lands is premature pending the completion of the City Edge project in accordance with objective CSO2.

Chief Executive’s Recommendation

Retain Z10 zoning.

Map Reference: D-0017

Site Address: Jamestown Industrial Centre and HG Ritchie Co., Jamestown Road, Inchicore

Draft Plan Zoning: Z6

Requested Zoning: Z10 or Z1/Z14

CE Recommended Zoning: Z6

Summary

A submission was made seeking the rezoning of Z6 lands at Jamestown Road to Z1 / Z14 or Z10. The submission stated that the lands are suitable for rezoning due to their location adjacent to existing Z10 lands; the strategic location of the site adjacent to existing high capacity/ high frequency public transport services; the proximity to residential and neighbourhood centre/ village centre facilities in Inchicore; and the location of the lands with views over the Grand Canal.

The submission noted that the subject lands have previously specifically been identified for intended rezoning as part of the study of all the industrial and employment zoned land under the City Development Plan 2016-2022 and, therefore, are considered suitable for rezoning in this regard.

Chief Executive's Response

On foot of objective CEE04 of the current Dublin City Development Plan 2016, a detailed review of all Z6 zoned lands in the city was undertaken with a view to determining which lands had redevelopment potential and would be suitable for a change in zoning to facilitate more compact growth. This resulted in a series of variations to the current plan, where a number of Z6 lands were rezoned to Z1 and Z10. It is acknowledged that the subject lands were identified for potential rezoning.

The Draft Plan supports the future development of the wider Naas Road lands area, incorporating parts of Park West and lands in South Dublin County Council, and are the subject of a master planning process funded under the Urban Regeneration and Development Fund (URDF) programme (City Edge Project). It is anticipated that this will result in a statutory plan coming forward that, if necessary to inform a variation to the Development Plan.

CSO2 of the Draft Plan states that it is an objective of the City Council:

“To prepare a local statutory plan in conjunction with South Dublin County Council for lands at Kylemore Road/Naas Road and Ballymount lands to enable a co-ordinated and phased development on these lands over the medium to long term.”

As such, it is considered that the rezoning of the lands is premature pending the completion of the City Edge Project in accordance with objective CSO2.

Chief Executive's Recommendation

Retain Z6 zoning.

Map Reference: D-0018

Site Address: Kylemore Road / Parkwest Road and Inchicore Works and Lands East of Kylemore Road

Draft Plan Zoning: Z6

Requested Zoning: Z14

CE Recommended Zoning: Z6

Summary

A submission was made seeking the rezoning of the subject Z6 lands to Z14 having regard to the policies and objectives of the NPF and RSES and the findings of the DCC Review of Industrial Lands (Z6/Z7) in the City.

It is submitted that further Z6 land should be zoned for residential uses and mixed uses, particularly lands at "Kylemore Road/Parkwest Road (including small Z7 land bank) and Inchicore Works and Lands East of Kylemore Road. .

Chief Executive's Response

On foot of objective CEE04 of the current Dublin City Development Plan 2016, a detailed review of all Z6 zoned lands in the city was undertaken with a view to determining which lands had redevelopment potential and would be suitable for a change in zoning to facilitate more compact growth. This resulted in a series of variations to the current plan, where a number of Z6 lands were rezoned to Z1 and Z10. It is acknowledged that the subject lands were identified for potential rezoning.

The Draft Plan supports the future development of the wider Naas Road lands area, incorporating parts of Park West and lands in South Dublin County Council, and are the subject of a master planning process funded under the Urban Regeneration and Development Fund (URDF) programme (City Edge Project). It is anticipated that this will result in a statutory plan coming forward that, if necessary to inform a variation to the Development Plan.

CSO2 of the Draft Plan states that it is an objective of the City Council:

"To prepare a local statutory plan in conjunction with South Dublin County Council for lands at Kylemore Road/Naas Road and Ballymount lands to enable a co-ordinated and phased development on these lands over the medium to long term."

As such, it is considered that the rezoning of the lands is premature pending the completion of the City Edge Project in accordance with objective CSO2.

Chief Executive's Recommendation

Retain Z6 zoning.

Map E

| Site Address | Draft Plan Zoning | Requested Zoning | CE Recommendation | Map Sheet | Map Reference |
|--|-------------------|------------------|-------------------|-----------|---------------|
| 1 to 11 Nelson Street, Dublin | Z2 | Z8 | Z2 | Map E | E-0001 |
| The Black Church, St. Mary's Place North, D07 | Z1 | Z2 | Z2 | Map E | E-0003 |
| The Hendron's Building, 41 Dominick Street Upper, D07 | Z3 | Z3 | Z3 | Map E | E-0004 |
| Thomas Brennan's Bar, 15 Dominick Street, Dublin 7. | Z1 | Z2 | Z2 | Map E | E-0005 |
| 106-112 Dorset Street | Z1 | Z15 | Z1 | Map E | E-0006 |
| 12 Manor Street , Stoneybatter, Dublin 7 | Z15 | Z5 | Z3 | Map E | E-0007 |
| 12 to 14 Nelson Street, Dublin 7 | Z2 | Z8 | Z2 | Map E | E-0008 |
| 134/135 Lower Baggot Street, Dublin 2 | Z4/ Z8 | Z4 | Z4 | Map E | E-0010 |
| 146a, 148, 148a Richmond Road, Dublin 3 | Z10 | Z1 | Z10 | Map E | E-0011 |
| 16 and 17 Berkeley Street, D07 | Z1 | Z8 | Z2 | Map E | E-0012 |
| 18 to 23 Blessington Street, Dublin 7. | Z2 | Z8 | Z2 | Map E | E-0013 |
| 22-37 Nelson Street | Z2 | Z8 | Z2 | Map E | E-0014 |
| 8/9/10 Prussia Street | Z1/ Z2 | Z6 | Z1/ Z2 | Map E | E-0015 |
| 88-90 Townsend Street | Z1 | Z5 | Z1 | Map E | E-0016 |
| 90-91 Townsend Street | Z3 | Z5 | Z3 | Map E | E-0017 |
| An Oige, 61 Mountjoy St., D07 | Z15 | Z15 | Z2 | Map E | E-0018 |
| Bailey Gibson | Z4 | Z14 | Z14 | Map E | E-0019 |
| Basin View / James St. Primary and Secondary Schools (SDRA 15) | Z15 | Z12 | Z15 | Map E | E-0020 |
| St. James's Primary School, Basin Lane, James Street, Dublin 8 | Z15 | Z12 | Z15 | Map E | E-0020 |
| Capuchin Friary, Church Street | Z5 | Z12 | Z5 | Map E | E-0021 |

| | | | | | |
|---|-------|-----|--------|-------|--------|
| Carrisbrook House, 112 Northumberland Road, Dublin 4 | Z6/Z1 | Z6 | Z6/ Z1 | Map E | E-0022 |
| Catherine McAuley School, 59 Lower Baggot Street, Dublin 2 | Z15 | Z12 | Z15 | Map E | E-0023 |
| Scoil Chaitriona Baggot Street, 59 Lower Baggot Street, Dublin 2 | Z15 | Z12 | Z15 | Map E | E-0023 |
| Catholic University School, 89 Lower Leeson Street Dublin 2 | Z8 | Z12 | Z8 | Map E | E-0024 |
| Central Model Senior School, Marlborough Street Dublin 1 | Z15 | Z12 | Z15 | Map E | E-0025 |
| Central Model Infants school, Marlborough Street, Dublin 1 | Z15 | Z12 | Z15 | Map E | E-0025 |
| Charlemont Street, Harcourt Road and Richmond Street South, Dublin 2 | Z10 | Z6 | Z10 | Map E | E-0026 |
| Christ the King Boys NS, Annaly Road, Cabra, Dublin 7 | Z15 | Z12 | Z15 | Map E | E-0027 |
| Christ the King Junior Girls NS, Annaly Road, Cabra, Dublin 7 | Z15 | Z12 | Z15 | Map E | E-0027 |
| Christ the King Senior Girls NS, Annaly Road, Cabra, Dublin 7 | Z15 | Z12 | Z15 | Map E | E-0027 |
| Circle K Cabra Road, Dublin 7 | Z1 | Z3 | Z3 | Map E | E-0028 |
| Circle K Glasnevin, Finglas Road Dublin 11 | Z1 | Z3 | Z3 | Map E | E-0029 |
| Circle K Kilmainham, South Circular Road, Dublin | Z9 | Z3 | Z9 | Map E | E-0030 |
| City Quay NS Gloucester Street South, Dublin 2 | Z15 | Z12 | Z15 | Map E | E-0031 |
| Coach Houses, Royal Hospital, Kilmainham Lane | Z9 | Z1 | Z9 | Map E | E-0032 |
| Construction House and Canal House, Canal Road, Dublin 6 | Z10 | Z6 | Z10 | Map E | E-0033 |

| | | | | | |
|--|-------|------------------------------|---------|-------|--------|
| Crosscare Wellington Centre, 24-26 Wellington Street Upper, D07 | Z1 | Z2 | Z2 | Map E | E-0034 |
| Director of Public Prosecutions Site, Infirmary Road | Z9 | Existing use (not specified) | Z9 | Map E | E-0035 |
| Drumcondra Road Lower | Z4 | Z2 | Z4 | Map E | E-0036 |
| Fountain Lodge, 1 Chapelizod Road, Dublin 8 | Z9 | Z1 | Z9 | Map E | E-0038 |
| Francis Street CBS (Primary) Francis Street, Dublin 8 | Z1 | Z12 | Z15 | Map E | E-0039 |
| Gaelscoil Inse Chor, An Chur Bhothar Theas Droichead an Hinse, Baile Atha Cliath 8 | Z9 | Z12 | Z15 | Map E | E-0040 |
| Gardiner Street Primary School, 76 Upper Gardiner Street, Dublin 1 | Z8 | Z12 | Z8 | Map E | E-0041 |
| Gealscoil Cholaiste Mhuire, 4 Cearnog Pharnell, Baile Atha Cliath 1 | Z8/Z1 | Z12 | Z8/Z1 | Map E | E-0042 |
| Grand Canal Street Lower | Z2 | Z10 | Z1 | Map E | E-0043 |
| Grattan Hall, Lower Mount Street | Z10 | Z1 | Z1 | Map E | E-0044 |
| Griffith Court, Fairview, Dublin 3 | Z1 | Z9 | Z1 | Map E | E-0045 |
| Hampton, Grace Park Road, Dublin 9 | Z15 | Z1/Z9 | Z1/Z9 | Map E | E-0046 |
| Henrietta Street School, 8 Henrietta Street, Dublin 1 | Z8/Z1 | Z12 | Z1/Z8 | Map E | E-0047 |
| Holy Child Pre School, Rutland St Project, Lower Sean McDermott Street, Dublin 1 | Z5 | Z12 | Z15 | Map E | E-0048 |
| Holy Family School for the Deaf, Navan Road, Dublin 7 | Z15 | Z12 | Z15 | Map E | E-0049 |
| Immaculate Heart of Mary, City Quay, Dublin 2 | Z5 | Z12 | Z5 | Map E | E-0050 |
| Inchicore NS, Sarisfield Road, Inchicore, Dublin 10 | Z15 | Z12 | Z15 | Map E | E-0051 |
| Le Touche House, IFSC | Z9 | Z5 | Z5 / Z9 | Map E | E-0052 |

| | | | | | |
|--|--------|-----|-----|-------|-----------------------------|
| Leyden's Cash and Carry, 158A Richmond Road, Dublin 3 | Z10 | Z1 | Z10 | Map E | E-0053 |
| Loreto College Junior School (Girls) 53 Stephens Green, Dublin 2 | Z8 | Z12 | Z8 | Map E | E-0054 |
| Marrowbone Lane, Dublin 8 | Z9/Z14 | Z9 | Z14 | Map E | E-0055 |
| Mary Help of Christians GNS, Navan Road, Dublin 7 | Z15 | Z12 | Z15 | Map E | E-0056 |
| St. John Bosco Junior Boys NS, Navan road, Dublin 7 | Z15 | Z12 | Z15 | Map E | E-0056 |
| St. John Bosco Senior Boys NS, Navan Road, Dublin 7 | Z15 | Z12 | Z15 | Map E | E-0056 |
| Maxol, 179 Navan Road, Dublin 7 | Z15 | Z1 | Z1 | Map E | E-0057 |
| Maxol, 79c Mespil Road, Dublin 4 | Z9 | Z4 | Z9 | Map E | E-0058 |
| Most Precious Blood, Cabra West, Dublin 7 | Z15 | Z12 | Z15 | Map E | E-0059 |
| Polefield Site - MKN Hotel site East Wall Road | Z6 | Z10 | Z10 | Map E | E-0060 |
| Mud Island Community Garden | Z9 | Z9 | Z9 | Map E | E-0061 |
| New Street, Dublin 8 | Z1 | Z6 | Z1 | Map E | E-0062 |
| O' Connell CBS Primary, North Richmond Street, North Circular Road, Dublin 1 | Z15 | Z12 | Z15 | Map E | E-0063 |
| Old Fever Hospital Cork Street | Z15 | Z12 | Z15 | Map E | E-0064 |
| Our Lady Help of Christians, Navan Road, Dublin 7 | Z15 | Z12 | Z15 | Map E | E-0065 |
| Our Lady of Good Counsel BNS, Mourne Road, Drimnagh Dublin 12 | Z15 | Z12 | Z15 | Map E | E-0066 |
| Our Lady of Good Counsel GNA, Mourne Road, Drimnagh Dublin 12 | Z15 | Z12 | Z15 | Map E | E-0066 (See also G-0012) |

| | | | | | |
|--|-----|-----|----------|-------|-----------------------------|
| Our Lady of the Holy Rosary of Fatima, South Circular Road | Z1 | Z12 | Z15 | Map E | E-0067 |
| Our Lady of Lourdes Girls NS, Goldenbridge, Inchicore, Dublin 8 | Z15 | Z12 | Z15 | Map E | E-0068 |
| Presentation Primary School, George's Hill, Halston, Street, Dublin 7 | Z5 | Z12 | Z15 | Map E | E-0069 |
| Presentation Primary School, Warrenmount, Blackpitts, Dublin 8 | Z15 | Z12 | Z15 | Map E | E-0070 |
| Pembroke Gardens, Ballsbridge | Z1 | Z9 | Z9 | Map E | E-0071 |
| Rear of 1A Prussia Street Dublin 7 | Z6 | Z3 | Z3 | Map E | E-0072 |
| Rutland NS, Lower Gloucester Street, Dublin 1 | Z5 | Z12 | Z15 | Map E | E-0073 |
| S. Columba's NS, Iona Road, Glasnevin, Dublin 9 | Z15 | Z12 | Z15 | Map E | E-0074 |
| Scoil Treasa Naofa, Petrie Road, Donore Avenue, Dublin 8 | Z15 | Z12 | Z15 | Map E | E-0075 |
| Scoil Chaoimhin, Marlborough Street, Dublin 1 | Z5 | Z12 | Z15 | Map E | E-0077 |
| Scoil Iosagain CBS, Aughnannagh Road, Crumlin Dublin 12 | Z1 | Z12 | Z15 | Map E | E-0078 |
| Scoil Mhuire Ogh I, Loreto Senior Primary School, Crumlin Road, Dolphins Barn, Dublin 12 | Z15 | Z12 | Z15 | Map E | E-0079 (See also G-0015) |
| Scoil Sancta Maria CBS, Christian Brothers, Synge Street, Dublin 8 | Z15 | Z12 | Z15 | Map E | E-0080 |
| Shaw's Lane and Bath Avenue, Dublin 4 | Z1 | Z10 | Z1 | Map E | E-0081 |
| Shelbourne Greyhound Stadium | Z9 | Z1 | Z14 / Z9 | Map E | E-0082 |
| St. Agatha's, North William Street. Dublin 1 | Z15 | Z12 | Z15 | Map E | E-0083 |
| St. Brigid's Primary School, The Coombe, Dublin 8 | Z15 | Z12 | Z15 | Map E | E-0084 |

| | | | | | |
|---|-----|-----|-----|-------|--------|
| St. Catherine's Infant NS, Ratoath Road, Cabra West, Dublin 7 | Z15 | Z12 | Z15 | Map E | E-0085 |
| St. Catherine's Senior Girls NS, Ratoath Road, Cabra, Dublin 7 | Z15 | Z12 | Z15 | Map E | E-0086 |
| St. Christopher's Primary School, Haddington Road, Ballsbridge, Dublin 4 | Z15 | Z12 | Z15 | Map E | E-0087 |
| St. Declan's Special School, 35 Northumberland Road, Dublin 4 | Z2 | Z12 | Z2 | Map E | E-0088 |
| St. Enda's Primary School, Whitefriar Street, Dublin 8 | Z5 | Z12 | Z15 | Map E | E-0089 |
| St. Finbarr's Boy's NS (Fionnbarra Naofa), Kilkieran Road, Cabra West, Dublin 7 | Z15 | Z12 | Z15 | Map E | E-0090 |
| St. Gabriel's NS, Cowper Street, North Circular Road, Dublin 7 | Z15 | Z12 | Z15 | Map E | E-0091 |
| St. James', James' Street, Dublin 8 | Z15 | Z12 | Z15 | Map E | E-0092 |
| St. John of God School, Islandbridge, Dublin 8 | Z15 | Z12 | Z15 | Map E | E-0096 |
| St. Joseph's Adolescent Special School, St. Vincent's Hospital, 193 Richmond Road, Fairview, Dublin 3 | Z1 | Z12 | Z15 | Map E | E-0097 |
| St. Joseph's CBS Primary School, Marino Park Avenue, Fairview, Dublin 3 | Z15 | Z12 | Z15 | Map E | E-0098 |
| St. Joseph's NS, East Wall Road, East Wall, Dublin 3 | Z14 | Z12 | Z15 | Map E | E-0099 |
| St. Kevin's, Harrington Street, Dublin 8 | Z15 | Z12 | Z15 | Map E | E-0101 |
| St. Laurence O'Toole CBS PS / Naomh Lorcan O' Tuathall, Seville Place, Dublin 1 | Z1 | Z12 | Z15 | Map E | E-0102 |

| | | | | | |
|---|-----|-----|-----|-------|--------|
| St. Laurence O'Toole NS, Seville Place, North Strand, Dublin 1 | Z1 | Z12 | Z15 | Map E | E-0102 |
| St. Laurence O'Toole Special School, Aldborough Parade, North Strand, Dublin 1 | Z5 | Z12 | Z15 | Map E | E-0103 |
| St. Mary's NS, Windsor Avenue Fairview, Dublin 3 | Z15 | Z12 | Z15 | Map E | E-0104 |
| St. Mary's Primary School, St. Mary's Place, Dorset Street, Dublin 7 | Z15 | Z12 | Z15 | Map E | E-0105 |
| St. Michan's Halston Street, Dublin 7 | Z5 | Z12 | Z5 | Map E | E-0106 |
| St. Patricks Boys NS, Millbourne Avenue , Drumcondra, Dublin 9 | Z15 | Z12 | Z15 | Map E | E-0107 |
| St. Patricks Athletic Football Club, Richmond Park, Emmet Road, Inchicore, Dublin 8 | Z9 | Z9 | Z9 | Map E | E-0108 |
| St. Pauls CBS Primary, North Brunswick Street, Dublin 7 | Z5 | Z12 | Z15 | Map E | E-0109 |
| St. Pauls, Arran Quay | Z5 | Z12 | Z5 | Map E | E-0110 |
| St. Peter's NS, St. Peters Road, Phibsborough Dublin 7 | Z2 | Z12 | Z15 | Map E | E-0111 |
| St. Vincent's CBS, St. Philomena's Road, Glasnevin Dublin 11 | Z15 | Z12 | Z15 | Map E | E-0112 |
| St. Vincent's Girls NS, North William Street, Dublin 1 | Z15 | Z12 | Z15 | Map E | E-0113 |
| St. Vincent's Infant Boys S, North William Street, Dublin 1 | Z15 | Z12 | Z15 | Map E | E-0114 |
| Stanhope Street Convent Primary School Manor Street, Dublin 7 | Z15 | Z12 | Z15 | Map E | E-0115 |
| Tolka Park | Z9 | Z9 | Z9 | Map E | E-0116 |

| | | | | | |
|---|-------|-------|-----------|-------|-----------------------------|
| Waterfall Avenue, Dublin 3 | Z9 | Z1 | Z9 | Map E | E-0117 |
| West Side of Camden Street Lower (between Grantham Street and Pleasant's Street) | Z1 | Z4 | Z4 | Map E | E-0118 |
| Damer Court, 35-47 Wellington Street Upper, D1 | Z15 | Z15 | Z2 and Z1 | Map E | E-0119 |
| Christ the King, Cabra, Dublin 7 | Z15 | Z12 | Z15 | Map E | E-0120 |
| Our Lady of Good Counsel, Mourne Road, Drimnagh Dublin 12 | Z15 | Z12 | Z15 | Map E | E-0121 |
| St. Teresa's , Donore Avenue | Z15 | Z4 | Z14 / Z15 | Map E | E-0122 |
| Trinity - North Wall Quay | Z5/Z9 | Z5/Z9 | Z5/Z9 | Map E | E-0123 |
| 2-3 Ballsbridge Park, Dublin 4 | Z1 | Z6 | Z6 | Map E | E-0124 |
| 40 Old Kilmainham Road, Dublin 8 | Z6 | Z1 | Z1 and Z9 | Map E | E-0125 |
| Beresford Street, Dublin 1 | Z5 | Z15 | Z5 | Map E | E-0126 |
| St. Vincent de Paul Senior Girls NS, Griffith Avenue , Marino, Dublin 9 | Z15 | Z12 | Z15 | Map E | E-0127 |
| St. Vincent de Paul Infant NS, Griffith Avenue, Marino, Dublin 9 | Z15 | Z12 | Z15 | Map E | E-0127 |
| St. Joseph's Primary School for Children with Visual Impairment, Greenpark Road, Drumcondra, Dublin 9 | Z15 | Z12 | Z15 | Map E | E-0128 (See also B-0048) |
| St. Auden's NS, Cook Street, Dublin 8 | Z5 | Z12 | Z15 | Map E | E-0129 |
| Iarnrod Eireann, East Wall Road Site | Z14 | Z7 | Z14 | Map E | E-0136 |
| 1-7 Berkley Street, Dublin 7 | Z2 | Z8 | Z2 | Map E | E-0139 |

Map Reference: E-0001

Site Address: 1 to 11 Nelson Street, Dublin

Draft Plan Zoning: Z2

Requested Zoning: Z8

CE Recommended Zoning: Z2

Summary

A submission was made seeking the re-zoning of lands at Nelson Street from Z2 Conservation Area to Z8 Georgian Conservation Area. It was submitted that the buildings that make up this streetscape are of architectural heritage importance and in poor condition. It is outlined that the Z8 zoning objective may encourage their conservation.

Chief Executive's Response

The CE recognises the importance of protecting historic buildings and character, however, given the location of the subject properties within a grouping of Z2 zoned lands, it is considered appropriate to retain the Z2 zoning at this stage. The Z2 zoning seeks to protect and improve the amenities of residential conservation areas, while Z8 seeks to protect the existing architectural and civic design and to allow for only limited expansion consistent with the conservation objective. The majority of the properties on Nelson Street appear to be divided into multi-unit residences mostly of poor quality. The Z2 zoning objective, therefore, allows for greater flexibility to improve and enhance the residential amenities of these properties to provide for much needed residential development in the city.

Chief Executive's Recommendation

Retain Z2 zoning.

Map Reference: E-0003

Site Address: The Black Church, St. Mary's Place North, D07

Draft Plan Zoning: Z1

Requested Zoning: Z2

CE Recommended Zoning: Z2

Summary

A submission was made seeking the rezoning of the Black Church from Z1 to Z2. It was noted that given the character and unique setting of the building that greater protection should be considered.

Chief Executive's Response

The subject property is a protected structure and, therefore, is subject to specific restrictions and requirements in terms of protecting the historic building from inappropriate development. However, noting the setting of the building within the Z2 conservation area to the north and west, it is considered appropriate to rezone the site from Z1 to Z2.

Chief Executive's Recommendation

Recommend rezoning to Z2.

Map Reference: E-0004

Site Address: The Hendron's Building, 41 Dominick Street Upper, D07

Draft Plan Zoning: Z3

Requested Zoning: Z3

CE Recommended Zoning: Z3

Summary

A submission was made in support of the Z3 zoning of this building being retained as the protected structure has good development potential to serve as a mixed use residential and local services hub.

Chief Executive's Response

The CE welcomes the submission in support of the zoning of the subject site. It is considered that the Z3 zoning on the site is appropriate to provide for and improve neighbourhood facilities.

Chief Executive's Recommendation

Retain Z3 zoning.

Map Reference: E-0005

Site Address: Thomas Brennan's Bar, 15 Dominick Street, Dublin 7.

Draft Plan Zoning: Z1

Requested Zoning: Z2

CE Recommended Zoning: Z2

Summary

A submission was made seeking the rezoning of the subject site from Z1 to Z2. It is submitted that the unique pub is a fine example of a conservation project, having being carefully renovated over the past 10 years. The property is of later Georgian, early Victorian period and deserves greater protection.

Chief Executive's Response

The subject site is located on the eastern corner of Mountjoy Street and Dominic Street Upper junction. The site forms part of a Z2 terrace of properties along Mountjoy Street and completes the historic streetscape at the corner before reaching an area of new residential developments along Dominick Street. It is considered that the building is a high quality historic bookend to the streetscape and is more aligned with the Z2 residential conservation zoning to the north.

Chief Executive's Recommendation

Rezoned to Z2.

Map Reference: E-0006
Site Address: 106-112 Dorset Street
Draft Plan Zoning: Z1
Requested Zoning: Z15
CE Recommended Zoning: Z1

Summary

A submission was made seeking the rezoning of buildings along Dorset Street from Z1 to Z15 to reflect the adjoining health and care related uses and to support the expansion of the Matter Hospital.

Chief Executive's Response

The subject buildings front onto Dorset Street and form part of a key thoroughfare in and out of the city. The properties comprise of ground floor commercial units with residential units above. Given the location of the site fronting a key route within the city, it is considered necessary to support the continuation of residential uses at this location to provide for an appropriate balance and mix of uses in the area.

Chief Executive's Recommendation

Retain as Z1.

Map Reference: E-0007

Site Address: 12 Manor Street, Stoneybatter, Dublin 7

Draft Plan Zoning: Z15

Requested Zoning: Z5

CE Recommended Zoning: Z3

Summary

The subject site comprises of a vacant three storey building formerly in educational use. The submission seeks rezoning on the basis that the property is derelict and no longer in use for educational purposes. The subject building has been sold and no longer forms part of the wider school site. In this respect, it is considered more suitable for mixed use development.

Chief Executive's Response

The subject site is located on Manor Street which forms the centre of Stoneybatter Village. The site adjoins residential properties to the north zoned Z3 and a number of commercial uses with upper floor residential make up the streetscape to the south. Given the prominent location of the site within the village core, the frontage onto the main street, and having regard to the fact that the property is no longer in use for educational purposes, it is considered that rezoning of the site from Z15 to Z3 is appropriate.

The submission requested rezoning to Z5, however, given the adjoining Z3 zoning to the north, it is considered that the subject site would better be suited as Z3 to be consistent with the progression from Z5 – City Centre to Z3 Neighbourhood Centre as the street moves northwards away from the city centre. The Z3 zoning will enable redevelopment of the site for local services and would provide for increased activation and animation of the streetscape.

Chief Executive's Recommendation

Rezone to Z3.

Map Reference: E-0008

Site Address: 12 to 14 Nelson Street, Dublin 7

Draft Plan Zoning: Z2

Requested Zoning: Z8

CE Recommended Zoning: Z2

Summary

A submission was made seeking the re-zoning of lands at Nelson Street from Z2 Conservation Area to Z8 Georgian Conservation Area. It was submitted that the buildings that make up this streetscape are of architectural heritage importance and in poor condition. It is outlined that the Z8 zoning objective may encourage their conservation.

Chief Executive's Response

As previously noted in response to E-0001, the CE recognises the importance of protecting historic buildings and character, however given the location of the subject properties within a grouping of Z2 zoned lands, it is considered appropriate to retain the Z2 zoning at this stage. The Z2 zoning seeks to protect and improve the amenities of residential conservation areas, while Z8 seeks to protect the existing architectural and civic design and allows for only limited expansion consistent with the conservation objective. The majority of the properties on Nelson Street appear to be divided into multi-unit residences mostly of poor quality. The Z2 zoning objective, therefore, allows for greater flexibility to improve and enhance the residential amenities of these properties to provide for much needed residential development in the city.

Chief Executive's Recommendation

Retain Z2 zoning.

Map Reference: E-0010

Site Address: 134/135 Lower Baggot Street, Dublin 2

Draft Plan Zoning: Z4/ Z8

Requested Zoning: Z4

CE Recommended Zoning: Z4

Summary

The submission sought the rezoning of a portion of the site in question from Z8 to Z4 to align with the existing site layout and uses on the site. The subject sites comprises of Boots retail store to the front addressing Baggot Street (Z4) and a new modern office block to the rear currently zoned Z8. It is submitted that the zoning is a mapping anomaly and a Z4 zoning is sought for the entire site.

Chief Executive's Response

The CE notes that the subject lands zoned Z8 are is a mapping error as the buildings on the site are clearly not of Georgian era and comprise modern 2 storey offices. Surrounding buildings and their rear mews developments adjoin the site along Pembroke Street and are correctly reflected as Z8 on the zoning maps. Therefore, it is considered that the Z8 zoning has been incorrectly applied to the subject site and a rezoning to Z4 is recommended.

Chief Executive's Recommendation

Rezoned to Z4.

Map Reference: E-0011

Site Address: 146a, 148, 148a Richmond Road, Dublin 3

Draft Plan Zoning: Z10

Requested Zoning: Z1

CE Recommended Zoning: Z10

Summary:

A submission seeks the rezoning of a 0.61 Ha site at No. 146A and Nos. 148-148A Richmond Road, Dublin 3 from Z10 to Z1 on basis of residential suitability / proximity to transport infrastructure and large scale commercial being unviable.

Chief Executive's Response

The subject site forms part of a wider Z10 zoning in the area. In order to ensure a coherent and consistent development strategy for this area, it is recommended that Z10 zoning should be retained to ensure that appropriate mixed uses are promoted.

Chief Executive's Recommendation

Retain Z10 zoning.

Map Reference: E-0012

Site Address: 16 and 17 Berkeley Street, D07

Draft Plan Zoning: Z1

Requested Zoning: Z8

CE Recommended Zoning: Z2

Summary

A submission was made noting that the two protected buildings in question are from the mid-late Georgian period (1780 - 1820) and, therefore, meet the criteria for Z8 Georgian Conservation Area status. It is noted that the buildings have been recorded in the National Archive of Architectural Heritage (ref: 50070413).

Chief Executive's Response

The subject properties are currently located within a Z1 zoned area and are bound by two modern buildings to the north and south. The overall stretch of the streetscape is, therefore, not consistent with the Z8 zoning objective to protect the character and setting of Georgian squares and streets.

The buildings are however, listed on the RPS and, therefore, must comply with best practice conservation methods to protect the historic character of the buildings. In an effort to further enhance the protection of the building, it is recommended to rezone to Z2 Residential Conservation Area to reflect the conservation importance of the buildings

Chief Executive's Recommendation

Rezone to Z2.

Map Reference: E-0013

Site Address: 18 to 23 Blessington Street, Dublin 7.

Draft Plan Zoning: Z2

Requested Zoning: Z8

CE Recommended Zoning: Z2

Summary

A submission notes that the five properties, most of which have protected status, all date to the mid-late Georgian period (1790 - 1810) and, therefore, meet the criteria for Z8 Georgian Conservation Area. It is noted that most of these buildings have been recorded in the National Archive of Architectural Heritage (refs: 50070432, 50070431, 50070430 and 50070429).

Some of these structures are significantly dilapidated. It is outlined that the Z8 zoning objective may encourage their conservation.

Chief Executive's Response

As previously noted in response to E-0001 and E-0008, the CE recognises the importance of protecting historic buildings and character, however, given the location of the subject properties within a grouping of Z2 zoned lands, it is considered appropriate to retain the Z2 zoning.

The Z2 zoning seeks to protect and improve the amenities of residential conservation areas, whilst Z8 seeks to protect the existing architectural and civic design and to allow for only limited expansion consistent with the conservation objective.

The majority of the properties on Blessington Street appear to be divided into multi-unit residences mostly of poor quality. The Z2 zoning objective, therefore, allows for greater flexibility to improve and enhance the residential amenities of these properties to provide for much needed residential development in the city.

Chief Executive's Recommendation

Retain as Z2.

Map Reference: E-0014
Site Address: 22-37 Nelson Street
Draft Plan Zoning: Z2
Requested Zoning: Z8
CE Recommended Zoning: Z2

Summary

The submission noted that the three properties, one of which is protected, all date to the mid-late Georgian period (1790 - 1810) and, therefore, meet the criteria for Z8 Georgian Conservation Area. It is noted that most of these buildings have been recorded in the National Archive of Architectural Heritage (ref: 50070420).

Some of these structures are significantly dilapidated. It is outlined that the Z8 zoning objective may encourage their conservation.

Chief Executive's Response

As previously noted in response to E-0001, E-0008 and E-0013, the CE recognises the importance of protecting historic buildings and character, however, given the location of the subject properties within a grouping of Z2 zoned lands, it is considered appropriate to retain the Z2 zoning.

The Z2 zoning seeks to protect and improve the amenities of residential conservation areas, whilst Z8 seeks to protect the existing architectural and civic design and to allow for only limited expansion consistent with the conservation objective.

The majority of the properties on Nelson Street appear to be divided into multi-unit residences mostly of poor quality. The Z2 zoning objective, therefore, allows for greater flexibility to improve and enhance the residential amenities of these properties to provide for much needed residential development in the city.

Chief Executive's Recommendation

Retain as Z2.

Map Reference: E-0015

Site Address: 8/9/10 Prussia Street

Draft Plan Zoning: Z1 / Z2

Requested Zoning: Z6

CE Recommended Zoning: Z1 / Z2

Summary

The subject site comprises two properties, 8 and 9/10 Prussia Street, that front onto the eastern side of Prussia Street, north of its junction with Fingal Place.

This submission requests that the zoning objective be changed from Objective Z1 and Z2 to Objective Z6: To provide for the creation and protection of enterprise and facilitate opportunities for employment creation; and that the currently unzoned part of the site at the rear to the north of Fingal Place is zoned to Objective Z6.

Chief Executive's Response

The majority of the subject site is zoned Z1 with a small section on the northern boundary zoned Z2. Having regard to the surrounding context and the zoning of the wider area as Z1 or Z2, it is considered that the current zoning is the most appropriate land use for the site. In relation to the unzoned part of the site to the rear, it is recommended to rezone to Z1 to regularise the entire site.

Chief Executive's Recommendation

Rezone unzoned lands to Z1. Retain Z1 and Z2 zoning for remainder of site.

Map Reference: E-0016

Site Address: 88-90 Townsend Street

Draft Plan Zoning: Z1

Requested Zoning: Z5

CE Recommended Zoning: Z1

Summary

The submission seeks the rezoning of 88-90 Townsend Street, Dublin 2 from Z1 to Z5 on basis of established non-residential use on the site and the significant demand for office accommodation.

Chief Executive's Response

The subject lands are location at the junction of Townsend Street and Creighton Street. The property adjoins a larger block of Z1 zoned lands. In this context, the Z1 zoning of the site is considered appropriate to avoid small piecemeal rezoning of specific sites.

Chief Executive's Recommendation

Retain as Z1 Zoning.

Map Reference: E-0017

Site Address: 90-91 Townsend Street

Draft Plan Zoning: Z3

Requested Zoning: Z5

CE Recommended Zoning: Z3

Summary

The submission seeks the rezoning of 90-91 Townsend Street, Dublin 2 from Z3 to Z5 on basis that the isolated nature of the Z3 lands and the lack of demand for retail or retail services in the context of Windmill Quarter scheme provides for an un-desirable land use in the area.

Chief Executive's Response

The property is zoned Z3 and bookends two Z1 zoned streets at the junction with the Z5 lands opposite at Windmill Lane. The Z3 zoning sets an appropriate transition between Z1 and Z5 zonings at the key junction and is, therefore, considered appropriate in the context of the wider area.

Chief Executive's Recommendation

Retain Z3 zoning.

Map Reference: E-0018

Site Address: An Oige, 61 Mountjoy St., D07

Draft Plan Zoning: Z15

Requested Zoning: Z15

CE Recommended Zoning: Z2

Summary

A submission was made in support of the retention of the Z15 zoning for The An Oige building, a protected structure, which has a history of institutional use. The submission noted that the building has recently been leased to an English language school and provides for ancillary residential accommodation for staff and students. The submission seeks that entire site remains under Z15 zoning (including the open space to the rear of the building).

Chief Executive's Response

The recent use of the building as a language school is noted, however, in the overall context of Z15 lands, it is considered that the institutional use of the site is redundant and therefore, it is considered that a Z2 zoning is more appropriate to reflect the historic building on the site.

Chief Executive's Recommendation

Rezone to Z2.

Map Reference: E-0019
Site Address: Bailey Gibson
Draft Plan Zoning: Z4
Requested Zoning: Z14
CE Recommended Zoning: Z14

Summary

This submission seeks the rezoning of the subject lands from Z4 to Z14 on the basis that the Z4 zoning was inappropriate for the site. It was submitted that Z4 “Key Urban Village / Urban Village” zoning should be attributed to key thoroughfares such as Cork Street to consolidate mixed services facilities within the village core. Z4 uses outside the core area dilutes the urban village zoning objective. An alternative regeneration Z14 zoning was, therefore, submitted as a more appropriate zoning objective.

Chief Executive’s Response

The subject site is located within St. Teresa’s Gardens SDRA 11. The majority of the lands within the SDRA are zoned Z14 for strategic development and regeneration. In order to remain consistent with the SDRA objectives, it is considered that a rezoning of the lands from Z4 to Z14 would be more appropriate to help consolidate and support the SDRA guiding principles and development objectives for the area.

Chief Executive’s Recommendation

Rezone to Z14.

Map Reference: E-0020

Site Address: St. James's Primary School, Basin Lane, James Street, Dublin 8

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Dublin 8 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0022

Site Address: Carrisbrook House, 112 Northumberland Road, Dublin 4

Draft Plan Zoning: Z1/ Z6

Requested Zoning: Z6

CE Recommended Zoning: Z6

Summary

A submission was made seeking the regularisation of lands at Carrisbrook House. The submission states that the car park ramp associated with the Z6 office building, located off Northumberland Road was incorrectly zoned. It was submitted that the ramp should be consistent with the remainder of the site and requested an amendment to the zoning to Z6.

Chief Executive's Response

The CE recommends that the inconsistency be corrected and the small strip of land currently in use as a car park ramp associated with the office building on the site be rezoned to Z6.

Chief Executive's Recommendation

Rezone to Z6.

Map Reference: E-0023

Site Address: Catherine McAuley School, 59 Lower Baggot Street, Dublin 2

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Dublin 2 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0023

Site Address: Scoil Chaitriona, Baggot Street, 59 Lower Bagott Street, Dublin 2

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Dublin 2 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0024

Site Address: Catholic University School, 89 Lower Leeson Street Dublin 2

Draft Plan Zoning: Z8

Requested Zoning: Z12

CE Recommended Zoning: Z8

Summary

A submission seeks the rezoning of school sites in the city from Z15 and other zoning designations to Z12. For this particular site, the submission seeks rezoning from Z8 to Z12. The submission notes that school sites are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on-site with no envisaged expansion plans or future requirements. It is stated that the current zoning objectives unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of wider educational use and future need is set out in the CE response to Chapter 14.

In relation to the subject site, it is considered that the Z8 Georgian Conservation Area zoning is appropriate given the site location and streetscape context as part of the Georgian core of the city, on a key approach to St. Stephen's Green. Lands zoned Z8 incorporate the main conservation areas in the city. The aim is to protect the architectural character/design and overall setting of such areas whilst facilitating regeneration, cultural uses and encouraging appropriate residential development in the Georgian areas of the city. It is noted that that current Z8 zoning designation does not disrupt the continued operation of educational uses at the site.

Chief Executive's Recommendation

Retain Z8 zoning.

Map Reference: E-0025

Site Address: Central Model Senior School, Marlborough Street Dublin 1

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Dublin 1 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0026

Site Address: Charlemont Street, Harcourt Road and Richmond Street South, Dublin 2

Draft Plan Zoning: Z10

Requested Zoning: Z6

CE Recommended Zoning: Z10

Summary

A submission seeks rezoning of site on Charlemont Street, Harcourt Road and Richmond Street South, Dublin 2 from Z10 to Z6 on basis that its current use and extant permission on the site is for large office development and high intensity employment uses.

It is submitted that the Z10 zoning objective is overly prescriptive and does not address situations of multiple ownerships. The 70/30 land use mix split may lead to ad hoc piecemeal development and commercial viability issues. As such, it is submitted that Z6 is a more appropriate use for the site.

Chief Executive's Response:

The subject site forms part of a larger Z10 block which extends from Harcourt Road to Charlemont Mall. The Z10 zoning objective for this city block sets out the appropriate framework for mixed use development. The 70/30 land use requirement ensures that an appropriate balance is achieved throughout the entire area.

The Z10 zoning provides for a variety of uses and creates a more active and vibrant streetscape for this highly accessible urban area. The subject site is located on a prominent corner adjoining Z4 and Z6 land use zones. As such, it is considered appropriate to retain the Z10 zoning on the subject site to ensure a good vibrant mix of uses is provided.

Chief Executive's Recommendation

Retain Z10 zoning.

Map Reference: E-0027

Site Address: Christ the King Boy's NS, Annaly Road, Cabra, Dublin 7

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Dublin 7 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0027

Site Address: Christ the King Junior Girl's NS, Annaly Road, Cabra, Dublin 7

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Cabra/Dublin 7 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0027

Site Address: Christ the King Senior Girl's NS, Annaly Road, Cabra, Dublin 7

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Cabra/Dublin 7 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0028

Site Address: Circle K, Cabra Road, Dublin 7

Draft Plan Zoning: Z1

Requested Zoning: Z3

CE Recommended Zoning: Z3

Summary

A submission seeks the rezoning of Circle K, Cabra Road service station from Z1 to Z3 on basis of the established/ permitted commercial use and its ongoing operation/ future development potential.

Chief Executive's Response

It is considered that the Z3 zoning objective is the appropriate zoning for the site having regard to the existing established local service uses on the site and the potential for future development to cater for local neighbourhood needs under the Z3 zoning objective.

Chief Executive's Recommendation

Rezone to Z3.

Map Reference: E-0029

Site Address: Circle K, Glasnevin, Finglas Road, Dublin 11

Draft Plan Zoning: Z1

Requested Zoning: Z3

CE Recommended Zoning: Z3

Summary

A submission seeks the rezoning of Circle K Glasnevin service station from Z1 to Z3 on basis of the established/ permitted commercial use and its ongoing operation/ future development potential.

Chief Executive's Response

It is considered that the Z3 zoning objective is the appropriate zoning for the site having regard to the existing established local service uses on the site and the potential for future development to cater for local neighbourhood needs under the Z3 zoning objective.

Chief Executive's Recommendation

Rezone to Z3.

Map Reference: E-0030

Site Address: Circle K, Kilmainham, South Circular Road, Dublin

Draft Plan Zoning: Z9

Requested Zoning: Z3

CE Recommended Zoning: Z9

Summary

A submission seeks the rezoning of Circle Kilmainham service station from Z9 to Z3 on basis of the established/ permitted commercial use and its ongoing operation/ future development potential.

Chief Executive's Response

The subject lands are located within a Z9 zone, with the objective *"To preserve, provide and improve recreational amenity, open space and ecosystem services"*. The subject site forms part of a larger open space area which is associated with Kilmainham Gaol to the north. The Z9 zoning seeks to retain the landscape character surrounding this historic building.

Notwithstanding the existing commercial use on the site, it is recommended that the Z9 zoning be retained to protect the site and the setting of Kilmainham Gaol.

Chief Executive's Recommendation

Retain Z9 zoning.

Map Reference: E-0031

Site Address: City Quay NS, Gloucester Street South, Dublin 2

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Dublin 2 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0032

Site Address: Coach Houses, Royal Hospital, Kilmainham Lane

Draft Plan Zoning: Z9

Requested Zoning: Z1

CE Recommended Zoning: Z9

Summary

A submission was made seeking the rezoning of a residential dwelling and associated private garden from Z9 to Z1. It is stated that this site has always been zoned open space as it appears on the OS Maps to belong to the Royal Hospital complex. However, the site is in use as a single dwelling and private amenity space.

It is submitted that changing the zoning objective of the garden from Z9 to Z1 would facilitate an examination of the potential to create a modest amount of residential development on this section of the embankment and offer the potential to create an improved treatment to the street incorporating better sight lines, while retaining the predominant landscape character and high embankment which at its eastern end is a notable feature of the area.

Chief Executive's Response

The subject site is located along the southern boundary of the Royal Hospital, now IMMA. The property and its associated garden address Kilmainham Lane in a narrow linear strip. The zoning of the site is consistent with the Z9 zoning of IMMA and forms part of the character and setting of the area.

The site is also located within a Conservation Area which is indicated as red hatching on the zoning maps. The purpose of Conservation Areas is to protect the special interest / value of historic settings, landscape character and architectural design. As such, it is important to protect the area against inappropriate development that could impact on the wider landscape character.

The Z9 zoning of the subject site creates an appropriate buffer between IMMA and the residential area to the south and provides for a biodiversity corridor having regard to the established hedgerow along the lane.

Having regard to the location of the site within a conservation area, the proximity to IMMA and the existing biodiversity value of the lands, it is considered that the Z9 zoning is appropriate to protect and enhance the existing character and setting of the area.

Chief Executive's Recommendation

Retain Z9 zoning.

Map Reference: E-0033

Site Address: Construction House and Canal House, Canal Road, Dublin 6

Draft Plan Zoning: Z10

Requested Zoning: Z6

CE Recommended Zoning: Z10

Summary

A submission seeks to rezone the subject site from Z10 to Z6 on the basis that the existing use on the site is office. It is submitted that the landowners have been in consultation with the Planning Department on the redevelopment of the existing office complex to provide for a new modern office development. It is stated that the Z10 zoning would undermine the future plans for the site for primary office use.

Chief Executive's Response

The subject site comprises of substantial urban development lands which have the ability to provide for significant mixed use development. The location of the site opposite a high frequency public transport corridor, fronting the Grand Canal and within close proximity to the city centre, is highly suitable for mixed use services in line with the 15 minute city concept. The Z10 zoning seeks to provide for a variety of uses and creates a more active and vibrant streetscape for this highly accessible urban area. The provision of mono office use at this location is considered to be an inefficient use of highly accessible lands.

As such, it is considered appropriate to retain the Z10 zoning on the subject site to ensure a good vibrant mix of uses is provided.

Chief Executive's Recommendation

Retain Z10 zoning.

Map Reference: E-0034

Site Address: Crosscare Wellington Centre, 24-26 Wellington Street Upper, D07

Draft Plan Zoning: Z1

Requested Zoning: Z2

CE Recommended Zoning: Z2

Summary

A submission was made seeking the rezoning of the site from Z1 to Z2 on the basis that this building is recorded on the National Archive of Architectural Heritage (ref: 50070509) and dates to the late Victorian period (1885 - 1895). As such, it was submitted that Z2 zoning would be more appropriate than Z1 due to its importance in terms of architectural heritage.

Chief Executive's Response

The subject site comprises of an old school building which appears to be associated with An Oige located opposite. Given the high quality architectural detail of the building and the location of the site within a historic setting, it is considered that the Z2 zoning objective would be more appropriate for the site.

Chief Executive's Recommendation

Rezone to Z2.

Map Reference: E-0035

Site Address: Director of Public Prosecutions site, Infirmary Road

Draft Plan Zoning: Z9

Requested Zoning: Existing Use (zoning not specified in submission)

CE Recommended Zoning: Z9

Summary

The subject site is zoned Z9 and is currently in use as offices for the Director of Public Prosecutions. It is submitted that this location is appropriate for office use due to the close proximity to the Central Criminal Courts. It is requested that the zoning be altered to expressly allow a consolidation of the function of the Director of Public prosecutions, in accordance with the previously granted permission on the site.

Chief Executive's Response

The subject site is located within the Z9 zoning of the Phoenix Park and surrounding area. The designation on these lands is to protect the character and setting of the Phoenix Park Conservation Area and to restrict development which would impact on such in the immediate vicinity. The subject site is one of a number of public buildings within the park in use for public services. The zoning of the lands does not affect the ongoing use of the building as the Director of Public Prosecutions offices and, therefore, should be retained as Z9.

Chief Executive's Recommendation

Retain Z9 zoning.

Map Reference: E-0036

Site Address: Drumcondra Road Lower

Draft Plan Zoning: Z4

Requested Zoning: Z2

CE Recommended Zoning: Z4

Summary

The submission seeks the rezoning of a number of properties on the east side of Drumcondra Road Lower from the corner of Clonliffe Road to the railway bridge from Z4 to Z2 based on the character and setting of the streetscape.

Chief Executive's Response

The subject lands form part of Drumcondra Urban Village. The existing uses within these buildings provide for important local services such as banking, ground floor commercial and residential uses. The mix of uses provided at this location contribute to the function of the Urban Village in line with the 15 minute city concept. As such, it is considered that the Z4 zoning is a more appropriate use for the lands.

Chief Executive's Recommendation

Retain Z4 zoning.

Map Reference: E-0038

Site Address: Fountain Lodge, 1 Chapelizod Road, Dublin 8

Draft Plan Zoning: Z9

Requested Zoning: Z1

CE Recommended Zoning: Z9

Summary

The submission seeks the rezoning of the site at Fountain Lodge, 1 Chapelizod Road, Dublin 8 from Z9 to Z1 on the basis of existing residential use and potential for additional residential development.

Chief Executive's Response

It is considered that the existing Z9 zoning of the site is necessary to prevent piecemeal adhoc development and to preserve the views and setting of the River Liffey. As such, it is considered that the Z9 zoning is a more appropriate zoning for the lands.

Chief Executive's Recommendation

Retain Z9 zoning.

Map Reference: E-0039

Site Address: Francis Street CBS (Primary) Francis Street, Dublin 8

Draft Plan Zoning: Z1

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of school sites in the city from Z15 and other zoning designations to Z12. For this particular site, the submission seeks rezoning from Z1 to Z12. The submission notes that school sites are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on-site with no envisaged expansion plans or future requirements. It is stated that the current zoning objectives unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

In relation to the subject site, it is recommended that the site is rezoned from Z1 to Z15 in order protect educational uses in the area.

A detailed response to the matter of wider educational use and future need is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Chief Executives Recommendation

Rezone to Z15

Map Reference: E-0040

Site Address: Gaelscoil Inse Chor, An Chur Bhothar Theas Droichead an Hinse, Baile Atha Cliath 8

Draft Plan Zoning: Z9

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of school sites in the city from Z15 and other zoning designations to Z12. For this particular site, the submission seeks rezoning from Z9 to Z12. The submission notes that school sites are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on-site with no envisaged expansion plans or future requirements. It is stated that the current zoning objectives unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

In relation to the subject site, it is recommended that the site is rezoned from Z9 to Z15 in order protect educational uses in the area.

A detailed response to the matter of wider educational use and future need is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Chief Executives Recommendation

Rezone to Z15

Map Reference: E-0041

Site Address: Gardiner Street Primary School, 76 Upper Gardiner Street, Dublin 1

Draft Plan Zoning: Z8

Requested Zoning: Z12

CE Recommended Zoning: Z8

Summary

A submission seeks the rezoning of school sites from Z15 and other zoning designations to Z12. For this particular site, the submission seeks rezoning from Z8 to Z12. The submission notes that school sites are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on-site with no envisaged expansion plans or future requirements. It is stated that the current zoning objectives unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of wider educational use and future need is set out in the CE response to Chapter 14.

In relation to the subject site, it is considered that the Z8 Georgian Conservation Area zoning is appropriate given the site location and streetscape context as part of the wider Georgian core of the city. Lands zoned Z8 incorporate the main conservation areas in the city. The aim is to protect the architectural character/design and overall setting of such areas whilst facilitating regeneration, cultural uses and encouraging appropriate residential development in the Georgian areas of the city. It is noted that that current Z8 zoning designation does not disrupt the continued operation of educational uses at the site.

Chief Executive's Recommendation

Retain Z8 zoning.

Map Reference: E-0042

Site Address: Gealscoil Cholaiste Mhuire, 4 Cearnog Pharnell, Baile Atha Cliath 1

Draft Plan Zoning: Z8/Z1

Requested Zoning: Z12

CE Recommended Zoning: Z8/Z1

Summary

A submission seeks the rezoning of school sites from Z15 and other zoning designations to Z12. For this particular site, the submission seeks rezoning from Z8/Z1 to Z12. The submission notes that school sites are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on-site with no envisaged expansion plans or future requirements. It is stated that the current zoning objectives unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of wider educational use and future need is set out in the CE response to Chapter 14.

In relation to the subject site, it is considered that the Z8 Georgian Conservation Area zoning is appropriate given the site location and streetscape context as part of the wider Georgian core of the city at Parnell Square. Lands zoned Z8 incorporate the main conservation areas in the city. The aim is to protect the architectural character/design and overall setting of such areas whilst facilitating regeneration, cultural uses and encouraging appropriate residential development in the Georgian areas of the city. It is noted that that current Z8 zoning designation does not disrupt the continued operation of educational uses at the site.

The retention of the Z1 zoning to the rear is appropriate having regard to the need to protect and preserve existing and potential residential uses in the area.

Chief Executives Recommendation

Retain Z8/Z1 zoning.

Map Reference: E-0043

Site Address: Grand Canal Street Lower

Draft Plan Zoning: Z2

Requested Zoning: Z10

CE Recommended Zoning: Z1

Summary

A submission seeks the rezoning of lands at Grand Canal Street Lower from Z2 to Z10 to facilitate their mixed-use redevelopment proximate to high quality transport infrastructure and to better reflect the surrounding land use character.

Chief Executive's Response

It is considered having regard to the scale and location of the site, that a rezoning of the site to Z1 rather than Z10 will promote the future development of much needed residential uses on this vacant site in line with the requirements of the core strategy. It is noted that small scale commercial uses are permissible under the Z1 zoning objective.

Chief Executives Recommendation

Rezone to Z1.

Map Reference: E-0044

Site Address: Grattan Hall, Lower Mount Street

Draft Plan Zoning: Z10

Requested Zoning: Z1

CE Recommended Zoning: Z1

Summary

A submission seeks the rezoning of lands at Grattan Hall, Lower Mount Street, an apartment building with 21 two-bedroom apartments to Z1, to better reflect the existing land use.

Chief Executive's Response

It is considered that a rezoning of the site to Z1 will appropriately reflect the current and long standing use of the site as residential.

Chief Executives Recommendation

Rezone to Z1.

Map Reference: E-0045

Site Address: Griffith Court, Fairview, Dublin 3

Draft Plan Zoning: Z1

Requested Zoning: Z9

CE Recommended Zoning: Z1

Summary

A submission seeks to rezone a small green area inside Griffith Court, Fairview, from Z1 to Z9 in order to correct a zoning anomaly/ reflect the role of the site as an open space.

Chief Executive's Response

It is considered that proposal this would represent an inappropriate piecemeal Z9 zoning, where adequate open space exists in the vicinity. The Z1 zoning provides for the opportunity to provide for a sensitive infill development on the site to meet the housing needs of the city.

Chief Executives Recommendation

Retain Z1.

Map Reference: E-0046

Site Address: Hampton, Grace Park Road, Dublin 9

Draft Plan Zoning: Z15

Requested Zoning: Z1/Z9

CE Recommended Zoning: Z1/Z9

Summary

A submission seeks rezoning of 3.63 ha lands at Hampton, Grace Park Road, Drumcondra, Dublin 9 from Z15 to Z1/Z9 on basis that they are currently under construction for a predominantly residential development and where completion of development would be compromised if lands remain Z15 as residential use would be impermissible.

Chief Executive's Response

It is considered that a rezoning of the site to Z1 and Z9 would better reflect the built out nature of the lands and future long term use for residential and associated amenity use. The Z1 zoning reflects the built out residential development and the Z9 zoning safeguards open space provision for those living in the area and for future residents.

Chief Executives Recommendation

Rezone Z1/Z9.

Map Reference: E-0047

Site Address: Henrietta Street School, 8 Henrietta Street, Dublin 1

Draft Plan Zoning: Z8/Z1

Requested Zoning: Z12

CE Recommended Zoning: Z8/Z1

Summary

A submission seeks the rezoning of school sites from Z15 and other zoning designations to Z12. For this particular site, the submission seeks rezoning from Z8/Z1 to Z12. The submission notes that school sites are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on-site with no envisaged expansion plans or future requirements. It is stated that the current zoning objectives unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of wider educational use and future need is set out in the CE response to Chapter 14.

In relation to the subject site, it is considered that the Z8 Georgian Conservation Area zoning is appropriate given the site location and streetscape context as part of the wider Georgian core of the city at Henrietta Street. Lands zoned Z8 incorporate the main conservation areas in the city. The aim is to protect the architectural character/design and overall setting of such areas whilst facilitating regeneration, cultural uses and encouraging appropriate residential development in the Georgian areas of the city. It is noted that that current Z8 zoning designation does not disrupt the continued operation of educational uses at the site.

The retention of the Z1 zoning to the rear is appropriate having regard to the need to protect and preserve existing and potential residential uses in the area.

Chief Executives Recommendation

Retain Z8/Z1 zoning.

Map Reference: E-0048

Site Address: Holy Child Pre School, Rutland St. Project, Lower Sean McDermott Street, D. 1

Draft Plan Zoning: Z5

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of school sites from Z15 and other zoning designations to Z12. For this particular site, the submission seeks rezoning from Z5 to Z12. The submission notes that school sites are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on-site with no envisaged expansion plans or future requirements. It is stated that the current zoning objectives unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity

Chief Executive's Response

In relation to the subject site, it is recommended that the site is rezoned from Z5 to Z15 in order protect educational uses in the area.

A detailed response to the matter of wider educational use and future need is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Chief Executives Recommendation

Rezone to Z15 zoning.

Map Reference: E-0049

Site Address: Holy Family School for the Deaf, Navan Road, Dublin 7

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Dublin 7 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0050

Site Address: Immaculate Heart of Mary, City Quay, Dublin 2

Draft Plan Zoning: Z5

Requested Zoning: Z12

CE Recommended Zoning: Z5

Summary

A submission seeks the rezoning of church sites. In relation to the subject site, the request relates to a rezoning from Z5 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services.

Chief Executives Response

The site sought for rezoning accommodates a substantial church structure which provides important religious and pastoral services to the community to which it serves. The church is on the RPS and the development potential is considered limited. It is considered in the absence of a clear development objective for this site by the Diocese, that a change of zoning for this site to Z12 is inappropriate.

The CE is of the view that such protected church buildings can potentially be utilised for a variety of ecclesiastical, community and/or cultural purposes. Should the existing church use become unviable or no longer needed by the Diocese, the opportunity remains to seek such uses in accordance with the provisions of the Z5 zoning objective.

In relation to the subject site, it is considered that a Z5 zoning is appropriate given the site location and context as part of the wider Z5 city centre zoning, where the objective is to consolidate and facilitate the development of the central area as an overall principle.

Chief Executives Recommendation

Retain Z5 zoning.

Map Reference: E-0051

Site Address: Inchicore NS, Sarlsfield Road, Inchicore, Dublin 10

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Inchicore area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0052
Site Address: Le Touche House, IFSC
Draft Plan Zoning: Z9
Requested Zoning: Z5
CE Recommended Zoning: Z5 / Z9

Summary

A submission seeks the rezoning of part of the lands surrounding La Touche House, IFSC from Z9 to Z5 on basis of the zoning of the lands under a previous 2011-2017 Development Plan and that the current zoning inhibits the expansion/ refurbishment of existing buildings in line with building/ energy standards.

Chief Executive's Response

The subject site represents an underutilised site within the established IFSC. It is considered appropriate to facilitate further intensification of these lands through the rezoning of a portion of them to Z5. The circulation area and dock remain Z9 which provides significant amenity in line with their designation as a conservation area.

Chief Executive's Recommendation

Rezone as Z5 / Z9.

Map Reference: E-0053

Site Address: Leyden's Cash and Carry, 158A Richmond Road, Dublin 3

Draft Plan Zoning: Z10

Requested Zoning: Z1

CE Recommended Zoning: Z10

Summary

A submission seeks the rezoning a 0.55ha site at No. 158A Richmond Road, Dublin 3 from Z10 to Z1 on the basis that housing would be a more viable and appropriate use given the core urban location, proximity to high quality public transport, services and amenities.

Chief Executive's Response

The subject site forms part of a wider Z10 zoning in the area. In order to ensure a coherent and consistent development strategy for this area and to provide for appropriate mixed use development in accordance with the principles of the 15 minute city, it is considered that Z10 zoning should be retained.

Chief Executive's Recommendation

Retain Z10.

Map Reference: E-0054

Site Address: Loreto College Junior School (Girls), 53 Stephen's Green, Dublin 2

Draft Plan Zoning: Z8

Requested Zoning: Z12

CE Recommended Zoning: Z8

Summary

A submission seeks the rezoning of school sites from Z15 and other zoning designations to Z12. For this particular site, the submission seeks rezoning from Z8 to Z12. The submission notes that school sites are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on-site with no envisaged expansion plans or future requirements. It is stated that the current zoning objectives unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of wider educational use and future need is set out in the CE response to Chapter 14.

In relation to the subject site, it is considered that the Z8 Georgian Conservation Area zoning is appropriate given the site location and streetscape context as part of the wider Georgian core of the city at St. Stephen's Green. Lands zoned Z8 incorporate the main conservation areas in the city. The aim is to protect the architectural character/design and overall setting of such areas whilst facilitating regeneration, cultural uses and encouraging appropriate residential development in the Georgian areas of the city. It is noted that that current Z8 zoning designation does not disrupt the continued operation of educational uses at the site.

Chief Executives Recommendation

Retain Z8 zoning.

Map Reference: E-0055

Site Address: Marrowbone Lane, Dublin 8

Draft Plan Zoning: Z9/Z14

Requested Zoning: Z9

CE Recommended Zoning: Z14

Summary

A number of submissions support a rezoning of the council owned lands at Marrowbone Lane Dublin 8 to Z9 for greening/recreational use and to address insufficient provision of green spaces, parks and sports facilities in the area.

Chief Executive's Response

In relation to the Marrowbone Lane Depot, Objective GIO55 of the Draft Plan (Page 384) and 13.17 SDRA 15 – Liberties and Newmarket Square (on page 588) seeks to provide for the development of the lands as a "Green Infrastructure and Recreational Area".

The SDRA 15 Guiding Principles for Liberties and Newmarket Square seek to improve the quality of the Liberties' main thoroughfares, including Marrowbone Lane, through improvements to the public realm and greening strategies and by establishing frontage of appropriate character and scale in relation to the street width.

In line with the specific guiding objectives for the future development of Marrowbone Lane as set out in the Draft Plan (on page 588), it is proposed to rezone the lands at Marrowbone Lane as Z14 to give the opportunity to remake the street as a new perimeter block, deliver definition and activity at Summer Street and also to provide potential for open space adjacent to St. Catherine's Sport Centre.

Chief Executives Recommendation

Rezone as Z14.

Map Reference: E-0056

Site Address: Mary Help of Christians GNS, Navan Road, Dublin 7

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Dublin 7 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0056

Site Address: St. John Bosco Junior Boy's NS, Navan Road, Dublin 7

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Dublin 7 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0056

Site Address: St. John Bosco Senior Boy's NS, Navan Road, Dublin 7

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Dublin 7 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0057

Site Address: Maxol, 179 Navan Road, Dublin 7

Draft Plan Zoning: Z15

Requested Zoning: Z1

CE Recommended Zoning: Z1

Summary

A submission seeks the rezoning of the subject site to Z1 on the basis of that the Z15 zoning is a non conforming zoning objective having regard to the established use on the site. It is detailed that having regard to the site characteristics and residential context, that a Z1 zoning objective is more appropriate.

Chief Executive's Response

A Z1 zoning of the site is more appropriate, having regard to the current use of the site and with regard to future development potential and the need to integrate with existing residential uses and Z1 zoning along Navan Road.

Chief Executive's Recommendation

Rezone as Z1.

Map Reference: E-0058

Site Address: Maxol, 79c Mespil Road, Dublin 4

Draft Plan Zoning: Z9

Requested Zoning: Z4

CE Recommended Zoning: Z9

Summary

A submission seeks the rezoning of the subject site from Z9 to Z4 to reflect the existing land use and long-established pattern of development in respect of the Maxol, Mespil Road Service Station, No. 79C Mespil Road, Dublin 4,

Chief Executive's Response

The existing Z9 zoning of the site is more appropriate having regard to higher order principles to protect and preserve the integrity of the overall Z9 zoning objective and green infrastructure network in the area with reference to the immediate proximity of the site to the canal waterway. Notwithstanding the current use on the site, it is considered that the retention of the Z9 objective is appropriate to protect the amenities and character of the area.

Chief Executive's Recommendation

Retain Z9.

Map Reference: E-0059

Site Address: Most Precious Blood, Cabra West, Dublin 7

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of church sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executives Response

The sites sought for rezoning all accommodate substantial church structures which provide important religious and pastoral services to the community to which they serve. The development potential of these sites is considered limited and would likely require demolition of the existing church building or substantial reconfiguration of the site in order to accommodate a meaningful infill development. It is considered in the absence of clear development objectives for these sites by the Diocese, that the rezoning of these sites to Z12 would be premature.

The existing uses on these sites are considered important social and community infrastructure, and having regard to the finite nature of such lands, it is considered appropriate that they are retained for such use. The CE is of the view that such church buildings can potentially be utilised for a variety of ecclesiastical and community purposes. In addition, it is noted that Z15 allows consideration for a number of residential institutional uses and assisted living/retirement accommodation. Should the existing church use become unviable or no longer needed by the Diocese, the opportunity remains to seek a variation to the plan in accordance with the provisions of the zoning objective.

Chief Executives Recommendation

Retain Z15.

Map Reference: E-0060

Site Address: Polefield Site - MKN Hotel site East Wall Road

Draft Plan Zoning: Z6

Requested Zoning: Z10

CE Recommended Zoning: Z10

Summary

A submission states that the Z6 zoning objective at East Wall Road, Dublin 3 is no longer relevant due to a grant of permission for commercial and residential development that is now under construction on site.

Chief Executive's Response

A rezoning of the site to Z10 is appropriate to reflect the permitted use of the site and would provide for appropriate mixed use development.

Chief Executive's Recommendation

Rezone to Z10.

Map Reference: E-0061

Site Address: Mud Island Community Garden

Draft Plan Zoning: Z9

Requested Zoning: Z9

CE Recommended Zoning: Z9

Summary

Submissions express support for the Z9 zoning at Mud Island.

Chief Executive's Response

The CE notes the submissions and supports the retention of the Z9 zoning.

Chief Executive's Recommendation

Retain Z9.

Map Reference: E-0062

Site Address: New Street, Dublin 8

Draft Plan Zoning: Z1

Requested Zoning: Z6

CE Recommended Zoning: Z1

Summary

A submission seeks to rezone a site at New Street, off New Street South, Dublin 8 from Z1 to Z6 on the basis of its planning history/ extant permission.

Chief Executive's Response

This is an opportunity infill site and the existing Z1 zoning can accommodate limited elements of mixed use, including office development, in order to incentivise development in some circumstances. In this regard, the CE recommends that the retention of the Z1 zoning objective is appropriate having regard to the character and context of the site.

Chief Executive's Recommendation

Retain Z1.

Map Reference: E-0063

Site Address: O' Connell CBS Primary, North Richmond Street, North Circular Road, Dublin 1

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Dublin 1 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0064

Site Address: Old Fever Hospital, Cork Street

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission requests a change to the Z12 zoning objective and that DCC work with LDA / HSE to develop the old Fever Hospital grounds at the Bru Chaoimhin complex in Cork Street as public green space / for social and affordable housing.

Chief Executive's Response

Having regard to the lack of robust evidence in the submission to support the rezoning of this site, including any detailed plans as to their development potential, it is considered that the site should remain zoned Z15 to protect and provide for essential community and social infrastructure. The CE notes that the existing Z15 zoning provides for limited residential development where appropriate and provides for 25% open space provision.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0065

Site Address: Our Lady Help of Christians, Navan Road, Dublin 7

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of church sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executives Response

The sites sought for rezoning all accommodate substantial church structures which provide important religious and pastoral services to the community to which they serve. The development potential of these sites is considered limited and would likely require demolition of the existing church building or substantial reconfiguration of the site in order to accommodate a meaningful infill development. It is considered in the absence of clear development objectives for these sites by the Diocese, that the rezoning of these sites to Z12 would be premature.

The existing uses on these sites are considered important social and community infrastructure, and having regard to the finite nature of such lands, it is considered appropriate that they are retained for such use. The CE is of the view that such church buildings can potentially be utilised for a variety of ecclesiastical and community purposes. In addition, it is noted that Z15 allows consideration for a number of residential institutional uses and assisted living/retirement accommodation. Should the existing church use become unviable or no longer needed by the Diocese, the opportunity remains to seek a variation to the plan in accordance with the provisions of the zoning objective.

Chief Executives Recommendation

Retain Z15 zoning.

Map Reference: E-0066

Site Address: Our Lady of Good Counsel BNS, Mourne Road, Drimnagh Dublin 12

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Drimnagh area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0066 (please see also G-0012)

Site Address: Our Lady of Good Counsel GNS, Mourne Road, Drimnagh Dublin 12

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Drimnagh area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0067

Site Address: Our Lady of the Holy Rosary of Fatima, South Circular Road

Draft Plan Zoning: Z1

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of church sites from Z15 to Z12. In relation to the subject site, the request relates to a rezoning from Z1 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services.

Chief Executives Response

The sites sought for rezoning all accommodate substantial church structures which provide important religious and pastoral services to the community to which they serve. The development potential of these sites is considered limited and would likely require demolition of the existing church building or substantial reconfiguration of the site in order to accommodate a meaningful infill development. It is considered in the absence of clear development objectives for these sites by the Diocese, that the rezoning of these sites to Z12 would be premature. The existing uses on these sites are considered important social and community infrastructure, and having regard to the finite nature of such lands, it is considered appropriate that they are retained for such use. The CE is of the view that such church buildings can potentially be utilised for a variety of ecclesiastical and community purposes

In relation to the subject site, it is considered that a Z15 zoning is appropriate to reflect the established use of the site and to provide for future essential community and social infrastructure provision. It is noted that Z15 allows consideration for a number of residential institutional uses and assisted living/retirement accommodation. Should the existing church use become unviable or no longer needed by the Diocese, the opportunity remains to seek a variation to the plan in accordance with the provisions of the zoning objective.

Chief Executives Recommendation

Rezone as Z15.

Map Reference: E-0068

Site Address: Our Lady of Lourdes Girls NS, Goldenbridge, Inchicore, Dublin 8

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Inchicore area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0069

Site Address: Presentation Primary School, George's Hill, Halston, Street, Dublin 7

Draft Plan Zoning: Z5

Requested Zoning: Z12

CE Recommended Zoning: Z5

Summary

A submission seeks the rezoning of school sites from Z15 and other zoning designations to Z12. For this particular site, the submission seeks rezoning from Z5 to Z12. The submission notes that school sites are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on-site with no envisaged expansion plans or future requirements. It is stated that the current zoning objectives unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

In relation to the subject site, it is recommended that the site is rezoned from Z5 to Z15 in order protect educational uses in the area.

A detailed response to the matter of wider educational use and future need is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Chief Executives Recommendation

Rezone to Z15 zoning.

Map Reference: E-0070

Site Address: Presentation Primary School, Warrenmount, Blackpitts, Dublin 8

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Dublin 8 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0071

Site Address: Pembroke Gardens, Ballsbridge

Draft Plan Zoning: Z1

Requested Zoning: Z9

CE Recommended Zoning: Z9

Summary

A submission requests the zoning of lands at Pembroke Gardens, Ballsbridge, Dublin 4 from Z1 to Z9 to reflect current open space use.

Chief Executive's Response

The subject lands form part of the set piece design of an established housing cluster and a Z9 zoning is considered to be reflective of the built form and open space layout.

Chief Executive's Recommendation

Rezone as Z9.

Map Reference: E-0072

Site Address: Rear of 1A Prussia Street, Dublin 7

Draft Plan Zoning: Z6

Requested Zoning: Z3

CE Recommended Zoning: Z3

Summary

A submission requests the rezoning of a site to rear of No. 1A Prussia Street, off Fingal Place, Dublin 7 from Z6 to Z3 to better reflect its contemporary use and character, the wider planning and development objectives for the area, and to correct a perceived drafting error.

Chief Executive's Response

A rezoning of the subject lands to Z3 would support a rationalisation of existing uses on site and is considered a more appropriate zoning objective having regard to the character and land uses on the site and its vicinity.

Chief Executive's Recommendation

Rezone as Z3.

Map Reference: E-0073

Site Address: Rutland NS, Lower Gloucester Street, Dublin 1

Draft Plan Zoning: Z5

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of school sites in the city from Z15 and other zoning designations to Z12. For this particular site, the submission seeks rezoning from Z5 to Z12. The submission notes that school sites are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on-site with no envisaged expansion plans or future requirements. It is stated that the current zoning objectives unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

In relation to the subject site, it is recommended that the site is rezoned from Z5 to Z15 in order protect educational uses in the area.

A detailed response to the matter of wider educational use and future need is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Chief Executives Recommendation

Rezone to Z15

Map Reference: E-0074

Site Address: S. Columba's NS, Iona Road, Glasnevin, Dublin 9

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Glasnevin area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0075

Site Address: Scoil Treasa Naofa, Petrie Road, Donore Avenue, Dublin 8

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Dublin 8 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0077

Site Address: Scoil Chaoimhin, Marlborough Street, Dublin 1

Draft Plan Zoning: Z5

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of school sites in the city from Z15 and other zoning designations to Z12. For this particular site, the submission seeks rezoning from Z5 to Z12. The submission notes that school sites are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on-site with no envisaged expansion plans or future requirements. It is stated that the current zoning objectives unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

In relation to the subject site, it is recommended that the site is rezoned from Z5 to Z15 in order protect educational uses in the area.

A detailed response to the matter of wider educational use and future need is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Chief Executives Recommendation

Rezone to Z15

Map Reference: E-0078

Site Address: Scoil Iosagain CBS, Aughnannagh Road, Crumlin, Dublin 12

Draft Plan Zoning: Z1

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of school sites in the city from Z15 and other zoning designations to Z12. For this particular site, the submission seeks rezoning from Z1 to Z12. The submission notes that school sites are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on-site with no envisaged expansion plans or future requirements. It is stated that the current zoning objectives unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

In relation to the subject site, it is recommended that the site is rezoned from Z1 to Z15 in order protect educational uses in the area.

A detailed response to the matter of wider educational use and future need is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Chief Executives Recommendation

Rezone to Z15

Map Reference: E-0079 (Please also see G-0015)

Site Address: Scoil Mhuire Ogh I, Loreto Senior Primary School, Crumlin Road, Dolphins Barn, Dublin 12

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Crumlin area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0080

Site Address: Scoil Sancta Maria CBS, Cristian Brothers, Synge Street, Dublin 8

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Dublin 8 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0081

Site Address: Shaw's Lane and Bath Avenue, Dublin 4

Draft Plan Zoning: Z1

Requested Zoning: Z10

CE Recommended Zoning: Z1

Summary

A submission seeks rezoning of lands at Shaw's Lane and Bath Avenue, Dublin 4 from Z1 to Z10 to facilitate mixed-use redevelopment proximate to high quality transport infrastructure.

Chief Executive's Response

The CE notes that whilst the subject site currently accommodates an ad-hoc mix of commercial uses, it is located in an area primarily characterised by residential use. Having regard to the location of this backland infill site and the established character of the area, it is considered that it is more appropriate to be retained as a Z1 zoning objective. The existing Z1 zoning can provide for a limited element of mixed use in order to support development in certain circumstances.

Chief Executive's Recommendation

Retain Z1 zoning.

Map Reference: E-0082

Site Address: Shelbourne Greyhound Stadium

Draft Plan Zoning: Z9

Requested Zoning: Z1

CE Recommended Zoning: Z14 / Z9

Summary

A submission seeks Shelbourne Stadium to be rezoned from Z9 to Z1. The submission notes that this is a key opportunity site within SDRA6- Docklands Plan.

It is stated that the current Z9 zoning is of limited public use or value to the community outside of race nights. Alternatively, a rezoning of the site to Z1 has the potential to accommodate over 750 Residential units in a mixed tenure development which could provide a mix of Social & Affordable units, Build to Rent, Build For Sale and Cost Rental apartment units.

Chief Executive's Response

This is a strategic site in Dublin docklands. Having regard to the strategic location within the Docklands SDRA and close proximity to high capacity public transport connections, it is considered an appropriate site for intensification having regard to the principles of compact growth and the 15 minute city.

The development of the site is also consistent with the broader objectives of the plan to limit dog racing.

Having regard to the location of the site within the SDRA, it is considered more appropriately zoned as Z14 to be consistent with the wider zoning objectives for the area. It is recommended that a Z9 buffer strip be retained for 15m from the River Dodder.

Chief Executive's Recommendation

Rezone as Z14 / Z9. See also CE report regarding Chapter 13 for recommended guiding principles for the subject site.

Map Reference: E-0083

Site Address: St. Agatha's, North William Street. Dublin 1

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of church sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executives Response

The site sought for rezoning accommodates a substantial church structure which provides important religious and pastoral services to the community to which it serves. The church is on the RPS and the development potential of these sites is considered limited. It is considered in the absence of clear development objectives for this site by the Diocese, that the rezoning of these sites to Z12 would not be supported. The existing uses on these sites are considered important social and community infrastructure, and having regard to the finite nature of such lands, it is considered appropriate that they are retained for such use.

The CE is of the view that such church buildings can potentially be utilised for a variety of ecclesiastical and community purposes. In addition, it is noted that Z15 allows consideration for a number of residential institutional uses and assisted living/retirement accommodation. Should the existing church use become unviable or no longer needed by the Diocese, the opportunity remains to seek a variation to the plan in accordance with the provisions of the zoning objective.

Chief Executives Recommendation

Retain Z15 zoning.

Map Reference: E-0084

Site Address: St. Brigid's Primary School, The Coombe, Dublin 8

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Dublin 8 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0085

Site Address: St. Catherine's Infant NS, Ratoath Road, Cabra West, Dublin 7

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Cabra/Dublin 7 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0086

Site Address: St. Catherine's Senior Girls NS, Ratoath Road, Cabra, Dublin 7

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Cabra/Dublin 7 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0087

Site Address: St. Christopher's Primary School, Haddington Road, Ballsbridge, Dublin 4

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Dublin 4 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0088

Site Address: St. Declan's Special School, 35 Northumberland Road, Dublin 4

Draft Plan Zoning: Z2

Requested Zoning: Z12

CE Recommended Zoning: Z2

Summary

A submission seeks the rezoning of school sites in the city from Z15 and other zoning designations to Z12. For this particular site, the submission seeks rezoning from Z2 to Z12. The submission notes that school sites are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on-site with no envisaged expansion plans or future requirements. It is stated that the current zoning objectives unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of wider educational use and future need is set out in the CE response to Chapter 14.

Given the high quality architectural detail of the building and the location of the site within a historic setting, it is considered that the Z2 zoning objective would be more appropriate for the site, reflective of the location and streetscape context of the site as part of a wider Z2 Residential Conservation Area. It is noted that that current Z2 zoning designation does not disrupt the continued operation of educational uses at the site.

Chief Executives Recommendation

Retain Z2 zoning.

Map Reference: E-0089

Site Address: St. Enda's Primary School, Whitefriar Street, Dublin 8

Draft Plan Zoning: Z5

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of school sites in the city from Z15 and other zoning designations to Z12. For this particular site, the submission seeks rezoning from Z5 to Z12. The submission notes that school sites are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on-site with no envisaged expansion plans or future requirements. It is stated that the current zoning objectives unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

In relation to the subject site, it is recommended that the site is rezoned from Z5 to Z15 in order protect educational uses in the area.

A detailed response to the matter of wider educational use and future need is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Chief Executives Recommendation

Rezone to Z15.

Map Reference: E-0090

Site Address: St. Finbarr's Boy's NS (Fionnbarra Naofa), Kilkieran Road, Cabra West, Dublin 7

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Cabra/Dublin 7 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0091

Site Address: St. Gabriel's NS, Cowper Street, North Circular Road, Dublin 7

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Dublin 7 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0092

Site Address: St. James', James' Street, Dublin 8

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of church sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executives Response

The site sought for rezoning accommodates a substantial church structure which provides important religious and pastoral services to the community to which they serve. The church is on the RPS and the development potential of these sites is considered limited. It is considered in the absence of clear development objectives for these sites by the Diocese, that the rezoning of these sites to Z12 would not be supported. The existing use on the site is considered important social and community infrastructure, and having regard to the finite nature of such lands, it is considered appropriate that it is retained for such use.

The CE is of the view that such church buildings can potentially be utilised for a variety of ecclesiastical and community purposes. In addition, it is noted that Z15 allows consideration for a number of residential institutional uses and assisted living/retirement accommodation. Should the existing church use become unviable or no longer needed by the Diocese, the opportunity remains to seek a variation to the plan in accordance with the provisions of the zoning objective.

Chief Executives Recommendation

Retain Z15 zoning.

Map Reference: E-0096

Site Address: St. John of God School, Islandbridge, Dublin 8

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Dublin 8 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0097

Site Address: St. Joseph's Adolescent Special School, St. Vincent's Hospital, 193 Richmond Road, Fairview, Dublin 3

Draft Plan Zoning: Z1

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of school sites in the city from Z15 and other zoning designations to Z12. For this particular site, the submission seeks rezoning from Z1 to Z12. The submission notes that school sites are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on-site with no envisaged expansion plans or future requirements. It is stated that the current zoning objectives unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

In relation to the subject site, it is recommended that the site is rezoned from Z1 to Z15 in order protect educational uses in the area.

A detailed response to the matter of wider educational use and future need is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Chief Executives Recommendation

Rezone to Z15.

Map Reference: E-0098

Site Address: St. Joseph's CBS Primary School. Marino Park Avenue, Fairview, Dublin 3

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Dublin 3 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0099

Site Address: St. Joseph's NS, East Wall Road, East Wall, Dublin 3

Draft Plan Zoning: Z14

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of school sites in the city from Z15 and other zoning designations to Z12. For this particular site, the submission seeks rezoning from Z14 to Z12. The submission notes that school sites are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on-site with no envisaged expansion plans or future requirements. It is stated that the current zoning objectives unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

In relation to the subject site, it is recommended that the site is rezoned from Z14 to Z15 in order protect educational uses in the area.

A detailed response to the matter of wider educational use and future need is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Chief Executives Recommendation

Rezone to Z15.

Map Reference: E-0101

Site Address: St. Kevin's, Harrington Street, Dublin 8

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of church sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executives Response

The sites sought for rezoning all accommodate substantial church structures which provide important religious and pastoral services to the community to which they serve. The development potential of these sites is considered limited and would likely require demolition of the existing church building or substantial reconfiguration of the site in order to accommodate a meaningful infill development. It is considered in the absence of clear development objectives for these sites by the Diocese, that the rezoning of these sites to Z12 would be premature. The existing uses on these sites are considered important social and community infrastructure, and having regard to the finite nature of such lands, it is considered appropriate that they are retained for such use.

The CE is of the view that such church buildings can potentially be utilised for a variety of ecclesiastical and community purposes. In addition, it is noted that Z15 allows consideration for a number of residential institutional uses and assisted living/retirement accommodation. Should the existing church use become unviable or no longer needed by the Diocese, the opportunity remains to seek a variation to the plan in accordance with the provisions of the zoning objective.

Chief Executives Recommendation

Retain Z15 zoning.

Map Reference: E-0102

Site Address: St. Laurence O'Toole CBS PS / Naomh Lorcan O 'Tuathall, Seville Place, D. 1

Draft Plan Zoning: Z1

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of school sites in the city from Z15 and other zoning designations to Z12. For this particular site, the submission seeks rezoning from Z1 to Z12. The submission notes that school sites are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on-site with no envisaged expansion plans or future requirements. It is stated that the current zoning objectives unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

In relation to the subject site, it is recommended that the site is rezoned from Z1 to Z15 in order protect educational uses in the area.

A detailed response to the matter of wider educational use and future need is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Chief Executives Recommendation

Rezone to Z15.

Map Reference: E-0102

Site Address: St. Laurence O'Toole NS, Seville Place, North Strand, Dublin 1

Draft Plan Zoning: Z1

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of school sites in the city from Z15 and other zoning designations to Z12. For this particular site, the submission seeks rezoning from Z1 to Z12. The submission notes that school sites are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on-site with no envisaged expansion plans or future requirements. It is stated that the current zoning objectives unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

In relation to the subject site, it is recommended that the site is rezoned from Z1 to Z15 in order protect educational uses in the area.

A detailed response to the matter of wider educational use and future need is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Chief Executives Recommendation

Rezone to Z15.

Map Reference: E-0103

Site Address: St. Laurence O'Toole Special School, Aldborough Parade North Strand, Dublin 1

Draft Plan Zoning: Z5

Requested Zoning: Z12

CE Recommended Zoning: Z5

Summary

A submission seeks the rezoning of school sites from Z15 and other zoning designations to Z12. For this particular site, the submission seeks rezoning from Z5 to Z12. The submission notes that school sites are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on-site with no envisaged expansion plans or future requirements. It is stated that the current zoning objectives unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity

Chief Executive's Response

In relation to the subject site, it is recommended that the site is rezoned from Z5 to Z15 in order protect educational uses in the area.

A detailed response to the matter of wider educational use and future need is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Chief Executives Recommendation

Rezone to Z15 zoning.

Map Reference: E-0104

Site Address: St. Mary's NS, Windsor Avenue Fairview, Dublin 3

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Dublin 3 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0105

Site Address: St. Mary's Primary School, St. Mary's Place, Dorset Street, Dublin 7

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Dublin 7 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0106

Site Address: St. Michan's, Halston Street, Dublin 7

Draft Plan Zoning: Z5

Requested Zoning: Z12

CE Recommended Zoning: Z5

Summary

A submission seeks the rezoning of church sites. In relation to the subject site, the request relates to a rezoning from Z5 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services.

Chief Executives Response

The site sought for rezoning accommodates a substantial church structure which provides important religious and pastoral services to the community to which it serves. The church is on the RPS and the development potential of these sites is considered limited. It is considered in the absence of clear development objectives for this site by the Diocese, that the rezoning of these sites to Z12 would be inappropriate.

The CE is of the view that such protected church buildings can potentially be utilised for a variety of ecclesiastical, community and/or cultural purposes. Should the existing church use become unviable or no longer needed by the Diocese, the opportunity remains to seek such uses in accordance with the provisions of the Z5 zoning objective.

In relation to the subject site, it is considered that a Z5 zoning is appropriate given the site location and context as part of the wider Z5 city centre zoning, where the objective is to consolidate and facilitate the development of the central area as an overall principle.

Chief Executives Recommendation

Retain Z5 zoning.

Map Reference: E-0107

Site Address: St. Patrick's Boys NS, Millbourne Avenue, Drumcondra, Dublin 9

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Dublin 9 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0108

Site Address: St. Patricks Athletic Football Club, Richmond Park, Emmet Road, Inchicore, Dublin 8

Draft Plan Zoning: Z9

Requested Zoning: Z9

CE Recommended Zoning: Z9

Summary

A submission seeks to retain the Z9 zoning of St Patrick's Athletic Football Club, Richmond Park, Emmet Road, Inchicore, Dublin 8.

Chief Executive's Response

The CE notes the submission from St. Patrick's Athletic FC Richmond Road and its plans to redevelop the existing football stadium and clarifies that it is proposed to retain the Z9 zoning of the lands.

It is considered appropriate to include St. Patrick's Athletics FC Richmond Road under Objective GIO15 to supports its redevelopment.

Chief Executive's Recommendation

Retain Z9. See also CE summary, response and recommendations regarding Chapter 10 and Objective GIO51.

Map Reference: E-0109

Site Address: St. Pauls CBS Primary, North Brunswick Street, Dublin 7

Draft Plan Zoning: Z5

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of school sites in the city from Z15 and other zoning designations to Z12. For this particular site, the submission seeks rezoning from Z5 to Z12. The submission notes that school sites are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on-site with no envisaged expansion plans or future requirements. It is stated that the current zoning objectives unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

In relation to the subject site, it is recommended that the site is rezoned from Z5 to Z15 in order protect educational uses in the area.

A detailed response to the matter of wider educational use and future need is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Chief Executives Recommendation

Rezone to Z15.

Map Reference: E-0110

Site Address: St. Pauls, Arran Quay

Draft Plan Zoning: Z5

Requested Zoning: Z12

CE Recommended Zoning: Z5

Summary

A submission seeks the rezoning of church sites. In relation to the subject site, the request relates to a rezoning from Z5 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services.

Chief Executives Response

The site sought for rezoning accommodates a substantial church structure which provides important religious and pastoral services to the community to which it serves. The church is on the RPS and the development potential is considered limited. It is considered in the absence of a clear development objective for this site by the Diocese, that a change of zoning for this site to Z12 is inappropriate.

The CE is of the view that such protected church buildings can potentially be utilised for a variety of ecclesiastical, community and/or cultural purposes. Should the existing church use become unviable or no longer needed by the Diocese, the opportunity remains to seek such uses in accordance with the provisions of the Z5 zoning objective.

In relation to the subject site, it is considered that a Z5 zoning is appropriate given the site location and context as part of the wider Z5 city centre zoning, where the objective is to consolidate and facilitate the development of the central area as an overall principle.

Chief Executives Recommendation

Retain Z5 zoning.

Map Reference: E-0111

Site Address: St. Peter's NS, St. Peters Road, Phibsborough Dublin 7

Draft Plan Zoning: Z2

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of school sites in the city from Z15 and other zoning designations to Z12. For this particular site, the submission seeks rezoning from Z2 to Z12. The submission notes that school sites are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on-site with no envisaged expansion plans or future requirements. It is stated that the current zoning objectives unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

In relation to the subject site, it is recommended that the site is rezoned from Z2 to Z15 in order protect educational uses in the area.

A detailed response to the matter of wider educational use and future need is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Chief Executives Recommendation

Rezone to Z15.

Map Reference: E-0112

Site Address: St. Vincent's CBS, St. Philomena's Road, Glasnevin, Dublin 11

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Glasnevin area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0113

Site Address: St. Vincent's Girls NS, North William Street, Dublin 1

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Dublin 1 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0114

Site Address: St. Vincent's Infant Boys S, North William Street, Dublin 1

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Dublin 1 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0115

Site Address: Stanhope Street Convent Primary School, Manor Street, Dublin 7

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Dublin 7 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0116
Site Address: Tolka Park
Draft Plan Zoning: Z9
Requested Zoning: Z9
CE Recommended Zoning: Z9

Summary

In relation to Tolka Park, a large volume of submissions were received, mainly in the form of signed petitions. The main issues raised are that the current Z9 zoning (Amenity/ Open Space Lands/Green Network) should be retained and that this is consistent with Draft Development Plan Policy GI46 (to improve existing recreational facilities in the city for all ages and groups) and GI48, (to encourage co-location of services between sports providers etc.).

Chief Executive's Response

The CE notes the submissions made and highlights that no change is proposed to the zoning of Tolka Park.

By way of background, Dublin City Council acquired both Tolka Park and Dalymount Park in order to ensure that both clubs, which were struggling post-recession, could be retained in the city. The intention was to develop one municipal stadium capable of accommodating both football clubs. Given the strong heritage, including international matches associated with Dalymount, both clubs and DCC agreed that the new municipal stadium should be at Dalymount, to be partly funded by the disposal of the Tolka Park grounds. However, more recently Shelbourne have indicated to the City Council that they are exploring options which will include plans to utilise Tolka Park for football/sports use.

Having regard to these circumstances and that the zoning in the Draft Plan is for Z9: To preserve, provide and improve recreational amenity, open space and ecosystem services, the Chief Executive is not recommending that the zoning of the site be changed to a residential/ mixed use zoning objective.

In relation to the submissions seeking additional text to ensure Tolka Park remains Z9, the Chief Executive is of the view that the zoning maps are specific objectives in their own right and it is not necessary to duplicate them with additional text, particularly given the number of policies already in the Draft Plan (see page 382-384). However, in this particular instance, it is recommended that existing objective G1051 (Dalymount Park) be expanded to include Tolka Park in the written statement (Page 384).

Chief Executive's Recommendation

Retain Z9. See also CE summary, response and recommendations regarding Chapter 10 and Objective GIO51.

Map Reference: E-0117

Site Address: Waterfall Avenue, Dublin 3

Draft Plan Zoning: Z9

Requested Zoning: Z1

CE Recommended Zoning: Z9

Summary

A submission seeks to rezone a parcel of land at Waterfall Avenue, Dublin 3 from Z9 to Z1 as it is stated to be surplus to the requirements of the Social and Sports Club.

Chief Executive's Response

To preserve potential for connectivity and permeability into the future, it is recommended to retain the integrity of overall Z9 lands and associated access points and, therefore, retain the Z9 zoning as is.

Chief Executive's Recommendation

Retain Z9.

Map Reference: E-0118

Site Address: West side of Camden Street Lower (between Grantham Street and Pleasant's Street)

Draft Plan Zoning: Z1

Requested Zoning: Z4

CE Recommended Zoning: Z4

Summary

A submission seeks the rezoning of entire west side of Camden Street Lower (between Grantham Street and Pleasant's Street) which includes No. 77 Camden Street Lower, Dublin 2 from Z1 to Z4 (Map E) to reflect the nature/character of existing uses, deliver a diverse mix of uses in the properties facing onto Camden Street and to bring this part of Camden Street into line with the predominant Z4 zoning on the balance of Camden Street.

Chief Executive's Response

A rezoning of the subject lands to Z4 would consolidate the existing / established market street of Camden Street and ensure consistent zoning across the block.

Chief Executive's Recommendation

Rezone to Z4.

Map Reference: E-0119

Site Address: Damer Court, 35-47 Wellington Street Upper

Draft Plan Zoning: Z15

Requested Zoning: Z15

CE Recommended Zoning: Z2/Z1

Summary

Submissions seeks the retention of a Z15 zoning on the lands.

Chief Executive's Response

In view of the redundant institutional building and reflective of existing use to rear for residential uses, it is considered that a residential zoning of the site would be more appropriate. The building to the front is a protected structure, and in this context, a Z2 zoning objective is recommended. The rear of the site accommodates established residential use and in this regard, a Z1 objective is recommended to reflect built out nature.

Chief Executive's Recommendation

Rezone to Z2/ Z1.

Map Reference: E-0120

Site Address: Christ the King, Cabra, Dublin 7

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of church sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executives Response

The sites sought for rezoning all accommodate substantial church structures which provide important religious and pastoral services to the community to which they serve. The development potential of these sites is considered limited and would likely require demolition of the existing church building or substantial reconfiguration of the site in order to accommodate a meaningful infill development. It is considered in the absence of clear development objectives for these sites by the Diocese, that the rezoning of these sites to Z12 would be premature. The existing uses on these sites are considered important social and community infrastructure, and having regard to the finite nature of such lands, it is considered appropriate that they are retained for such use.

The CE is of the view that such church buildings can potentially be utilised for a variety of ecclesiastical and community purposes. In addition, it is noted that Z15 allows consideration for a number of residential institutional uses and assisted living/retirement accommodation. Should the existing church use become unviable or no longer needed by the Diocese, the opportunity remains to seek a variation to the plan in accordance with the provisions of the zoning objective.

Chief Executives Recommendation

Retain Z15 zoning.

Map Reference: E-0121

Site Address: Our Lady of Good Counsel, Mourne Road, Drimnagh, Dublin 12

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of church sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executives Response

The sites sought for rezoning all accommodate substantial church structures which provide important religious and pastoral services to the community to which they serve. The development potential of these sites is considered limited and would likely require demolition of the existing church building or substantial reconfiguration of the site in order to accommodate a meaningful infill development. It is considered in the absence of clear development objectives for these sites by the Diocese, that the rezoning of these sites to Z12 would be premature. The existing uses on these sites are considered important social and community infrastructure, and having regard to the finite nature of such lands, it is considered appropriate that they are retained for such use.

The CE is of the view that such church buildings can potentially be utilised for a variety of ecclesiastical and community purposes. In addition, it is noted that Z15 allows consideration for a number of residential institutional uses and assisted living/retirement accommodation. Should the existing church use become unviable or no longer needed by the Diocese, the opportunity remains to seek a variation to the plan in accordance with the provisions of the zoning objective.

Chief Executives Recommendation

Retain Z15 zoning.

Map Reference: E-0122

Site Address: St. Teresa's, Donore Avenue

Draft Plan Zoning: Z15

Requested Zoning: Z4

CE Recommended Zoning: Z14 / Z15

Summary

A submission seeks the rezoning of St. Teresa's, Donore Avenue from Z15 to Z4 to facilitate future development potential.

Chief Executive's Response

St. Teresa's Gardens adjoins the St. Teresa's Church site on Donore Avenue.

SDRA 11 (St. Teresa's Gardens and Environs) of the Draft Plan (Page 560), sets out guiding principles to guide the future development of the area.

It is recommended to retain Z15 on the southern and eastern half of the site, containing the church and rezone the north west portion to Z14 to better integrate with SDRA 11 – St. Teresa's Gardens and Environs in terms of connectivity and permeability through the area, and to provide for a quality public realm.

For clarity, it is recommended that St. Teresa's Church is retained as Z15 to accord with its existing social and community use.

Chief Executive's Recommendation

Retain Z15 on the southern and eastern half of the site, containing the church; and rezone the north west portion to Z14.

Map Reference: E-0123
Site Address: Trinity - North Wall Quay
Draft Plan Zoning: Z5/Z9
Requested Zoning: Z5/Z9
CE Recommended Zoning: Z5/Z9

Summary

A submission seeks a Z5 zoning (currently Z9) to the curtilage of the building 'Stack B' (currently used by Trinity College) in order to consolidate teaching and academic activities and enliven the public realm through vertical and horizontal extension of the existing building fabric.

Chief Executive's Response

It is appropriate to rezone lands from Z9 to Z5 surrounding the curtilage of Stack B on the east over the car park to facilitate its expansion; and to retain a Z9 zoning to the north facing into George's Dock, in order to preserve the overall integrity and visual relationship of the remaining heritage elements of this building and its relationship with the Dock and provide potential for improved circulation.

Chief Executive's Recommendation

Rezone eastern portion of lands as Z5/ Z9.

Map Reference: E-0124

Site Address: 2-3 Ballsbridge Park, Dublin 4

Draft Plan Zoning: Z1

Requested Zoning: Z6

CE Recommended Zoning: Z6

Summary

A submission seeks rezoning of lands at Nos. 2-3 Ballsbridge Park, Dublin 4 from Z1 to Z6 on basis of their current/ future office use, extant office permission and Z6 zoning of adjoining office building at No. 1 Ballsbridge Park.

Chief Executive's Response

A Z6 zoning of the lands will better reflect existing/proposed uses having regard to the context of surrounding development and land use zoning.

Chief Executive's Recommendation

Rezone to Z6.

Map Reference: E-0125

Site Address: 40 Old Kilmainham Road, Dublin 8

Draft Plan Zoning: Z6

Requested Zoning: Z1

CE Recommended Zoning: Z10 and Z9

Summary

A submission seeks the rezoning of a 0.212ha site at 40 Old Kilmainham Road, Dublin 8 from Z6 to Z1 having regard to proximity to public transport/ city centre/ hospital and local vacancy issues.

Chief Executive's Response

It is recommended that a Z10 zoning of the site would be appropriate to facilitate appropriate suitable mixed use development on the site and on wider lands with elements of the lands retained as Z9 in recognition of the proximity of the site to the Camac River. Z10 will allow for a range of uses that can be compatible with the flood risk associated with these lands and for this reason Z1 is not appropriate.

Chief Executive's Recommendation

Rezone as Z10 and Z9.

Map Reference: E-0126

Site Address: Beresford Street, Dublin 1

Draft Plan Zoning: Z5

Requested Zoning: Z15

CE Recommended Zoning: Z5

Summary

A submission seeks the rezoning of lands purported to have been formerly used for education at Beresford Street, Dublin 1 from Z5 to Z15.

Chief Executive's Response

In view of the lack of detail and evidence in the submission regarding the need for a Z15 zoning on the lands, it is proposed to retain this site as Z5 as part of the wider Z5 city centre zoning, where the objective is to consolidate and facilitate the development of the central area as an overall principle.

It is noted that the zoning Z5 does not preclude educational uses at the site, and that educational use is a permissible use under this zoning category.

Chief Executive's Recommendation

Retain Z5.

Map Reference: E-0127

Site Address: St. Vincent de Paul Senior Girls NS, Griffith Avenue, Mario, Dublin 9

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Marion/Dublin 9 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0127

Site Address: St. Vincent de Paul Infant NS, Griffith Avenue, Marino, Dublin 9

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Marino/Dublin 9 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0128 (Please see also B-0048)

Site Address: St. Joseph's Primary School for Children with Visual Impairment, Greenpark Road, Drumcondra, Dublin 9

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of these school sites from Z15 to Z12. The submission notes that they are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Drumcondra/Dublin 9 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: E-0129

Site Address: St. Auden's NS, Cook Street, Dublin 8

Draft Plan Zoning: Z5

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of school sites in the city from Z15 and other zoning designations to Z12. For this particular site, the submission seeks rezoning from Z5 to Z12. The submission notes that school sites are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on-site with no envisaged expansion plans or future requirements. It is stated that the current zoning objectives unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

In relation to the subject site, it is recommended that the site is rezoned from Z5 to Z15 in order protect educational uses in the area.

A detailed response to the matter of wider educational use and future need is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Chief Executives Recommendation

Rezone to Z15

Map Reference: E-0136

Site Address: Iarnród Éireann, East Wall Road Site

Draft Plan Zoning: Z14

Requested Zoning: Z7

CE Recommended Zoning: Z14

Summary

A submission seeks the rezoning of lands at East Wall Road from Z14 to Z7 to facilitate the potential for a rail freight transfer facility in the future.

Chief Executive's Response

The lands form part of SDRA6, Docklands. Given the lack of robust detail regarding potential future development proposals and having regard to the development framework for the wider area as set in SDRA6, it is proposed to retain the lands as Z14 to ensure the future integrated development of the area. The Z7 zoning is a heavy industry zoning and is inconsistent with the character of development in the vicinity.

Chief Executives Recommendation

Retain Z14 Zoning.

Map Reference: E-0139

Site Address: 1-7 Berkley Street, Dublin 7

Draft Plan Zoning: Z2

Requested Zoning: Z8

CE Recommended Zoning: Z2

Summary

A submission seeks the rezoning of lands at Berkley Street, Dublin 7 from Z2 to Z8 to provide additional protection to the existing built form.

Chief Executive's Response

The lands form part of a wider Z2 zoning and existing buildings are included on the record of protected structures. It is considered appropriate to retain the consistency and integrity of this Z2 zoning as sufficient protection already exists under current designations.

Chief Executives Recommendation

Retain Z2 Zoning.

Map F

| Site Address | Draft Plan Zoning | Requested Zoning | CE Recommendation | Map Sheet | Map Reference |
|--|-------------------|------------------|-------------------|-----------|---------------|
| Circle K, Clontarf Road, Dublin 3 | Z1 | Z3 | Z3 | Map F | F-0001 |
| Vernon Heath and Adjoining Property to West | Z1 / Z9 | Z2 | Z1 / Z9 | Map F | F-0002 |
| ESB Compound, Vernon Avenue | Z1 | Z9/Z2 | Z1 | Map F | F-0003 |
| HSE Clinic, Vernon Avenue | Z1 | Z9/ Z2 | Z15 | Map F | F-0004 |
| St. Anthony's Parish Church, Clontarf | Z1 | Z9 | Z1/ Z15 | Map F | F-0005 |
| Redcourt, Clontarf | Z2 | Z1 | Z1 | Map F | F-0006 |
| Dublin Port - Area Q | Z6 | Z7 | Z6 | Map F | F-0009 |
| Dublin Port - Area O (3FM Project / Area N) and Area Q (Part of withdrawn Variation 25) in Dublin Port Masterplan 2040 | Z14 | Z7 | Z14 | Map F | F-0011 |
| Dublin Port - Terminal Yards west of Alexandra Basin and east/ north of Berth 51A | Unzoned | Z7 | Z7 | Map F | F-0012 |
| Eastpoint Fairview | Z6 / Z9 / Unzoned | Z6 / Z9 | Z6 | Map F | F-0013 |
| Eastpoint Fairview | Z6 | Z6 / Z10 | Z6 | Map F | F-0014 |
| St. Patricks Boys NS, Cambridge Road, Ringsend Dublin 4 | Z15 | Z12 | Z15 | Map F | F-0015 |
| St. Patricks Girls NS, Cambridge Road, Ringsend Dublin 4 | Z15 | Z12 | Z15 | Map F | F-0015 |
| Star of the Sea BNS, Leahy's Terrace, Sandymount, Dublin 4 | Z15 | Z12 | Z15 | Map F | F-0016 |
| St. John the Baptist Junior BNS, Seafield Road, Clontarf, Dublin 3 | Z15 | Z12 | Z15 | Map F | F-0017 |

| | | | | | |
|--|-----|-----|-----|-------|--------|
| St. John the Baptist Infant Girl's School, Seafield Road, Clontarf, Dublin 3 | Z15 | Z12 | Z15 | Map F | F-0017 |
| Belgrove Senior Boy's NS, Seafield Road, Clontarf, Dublin 3 | Z15 | Z12 | Z15 | Map F | F-0017 |
| Belgrove Senior Boy's NS, Seafield Road, Clontarf, Dublin 3 | Z15 | Z12 | Z15 | Map F | F-0017 |
| Maxol Service Station, Cranfield Place, Sandymount, Dublin 4 | Z1 | Z15 | Z1 | Map F | F-0018 |

Map Reference: F0001

Site Address: Circle K, Clontarf Road, Dublin 3

Draft Plan Zoning: Z1

Requested Zoning: Z3

CE Recommended Zoning: Z3

Summary

The submission seeks the rezoning of the Circle K service station at Clontarf Road from Z1 to Z3 on the basis of the established/permitted commercial use and its ongoing operation/future development potential. The submission states that its Z1 zoning has undermined its operation in the past.

Chief Executive's Response

The CE acknowledges the issues raised in the submission. It is agreed that a rezoning to Z3 would better reflect its established/permitted use. The Z3 zoning "to provide for and improve neighbourhood facilities" will enable the continued use of the site as a service station and will allow for future expansion for additional neighbourhood facilities if required.

Chief Executive's Recommendation

Rezone to Z3

Map Reference: F-0002

Site Address: Vernon Heath and Adjoining Property to West

Draft Plan Zoning: Z1/ Z9

Requested Zoning: Z2

CE Recommended Zoning: Z1/ Z9

Summary

The submission states that the designation of Vernon Heath as Z1 lands does not acknowledge the contribution it makes in terms of protecting and developing the biodiversity of St. Anne's Park. It also states that Vernon Heath has equal or more importance than Mount Prospect Lawns in terms of conservation and protecting the biodiversity and heritage of the area. It states that Vernon Heath has more open green space and garden areas that could accommodate greater biodiversity habitats than Mount Prospect Lawns.

The submission requests that the site be included in the Conservation Area designation or as a minimum zoned Z2.

Chief Executive's Response

The subject lands form part of a wider Z1 zoned area of established residential uses. The Z1 zoning objective seeks "to protect, provide and improve residential amenities" which is considered appropriate given the residential use of the lands.

The Z2 zoning objective "to protect and / or improve the amenities of residential conservation areas" sought in the submission is designed for residential areas that have extensive groupings of building and associated open spaces which have an significant architectural design and scale. Z2 zonings usually comprise of historic buildings and streetscapes of high architectural value.

Vernon Heath comprises of modern detached residential dwellings and a small area of open space zoned Z9 at the entrance. Given the overall design and setting of Vernon Health, it is considered that the retention of Z1 and Z9 zoning is more appropriate.

Chief Executive's Recommendation

Retain Z1 / Z9 zoning.

Map Reference: F-0003

Site Address: ESB Compound, Vernon Avenue

Draft Plan Zoning: Z1

Requested Zoning: Z9/Z2

CE Recommended Zoning: Z1

Summary

The submission seeks that the land on which the ESB Compound sits be rezoned from Z1 to Z9. Failing that, the submission requests that the site be rezoned to Z2. The submission also seeks for the Conservation Area designation to be extended to include the site.

Chief Executive's Response

Z1 lands seek to protect, provide and improve residential amenities. The main use on Z1 lands is for residential, however, there are other uses including public service installations that are permissible uses under the Z1 zoning and considered appropriate for such areas as critical enabling infrastructure. Z9 relates to amenity/open space lands/green network and is not considered a suitable zoning for the site having regard to its established use. As noted above, Z2 refers to residential conservation areas and is not an appropriate zoning objective for the site.

It is, therefore, considered that the site's zoning reflects the current and permitted use of the site.

Chief Executive's Recommendation

Retain Z1 zoning.

Map Reference: F-0004
Site Address: HSE Clinic, Vernon Avenue
Draft Plan Zoning: Z1
Requested Zoning: Z9/Z2
CE Recommended Zoning: Z15

Summary

The submission seeks that the HSE Health Centre site on Vernon Avenue be rezoned from Z1 to Z9. Failing that, the submission requests that the site be rezoned to Z2. The submission also seeks for the Conservation Area designation to be extended to include the site.

Chief Executive's Response

The subject lands comprise of Z1 land, with the object to protect, provide and improve residential amenities. Healthcare and related consultants are permissible uses within Z1 lands. However, in order to protect the future use of the lands as a health centre, it is considered more appropriate that a Z15 zoning, Community and Social Infrastructure with the objective "to protect and provide for community uses and social infrastructure" be applied to the lands to ensure that the ongoing use is retained and protected. As noted above, the Z9 and Z2 zoning objectives are not considered appropriate for this site having regard to its established use as a health centre.

The CE, therefore, recommends a rezoning of the lands from Z1 to Z15.

Chief Executive's Recommendation

Rezone to Z15.

Map Reference: F-0005

Site Address: St. Anthony's Parish Church, Clontarf

Draft Plan Zoning: Z1

Requested Zoning: Z9

CE Recommended Zoning: Z1/ Z15

Summary

The submission seeks to rezone an area of open space to the rear of the church from Z1 to Z9 to reflect its historic and ongoing use as a well-used amenity by the local community.

Chief Executive's Response

The subject site comprises of a church, a childcare facility and an area of open space to the rear of the site. All of the lands are currently zoned Z1. It is noted that the Z1 objective does not reflect the existing community uses on the site and as such, it is recommended that the church and the childcare facility and community hall be rezoned to Z15 to ensure the continued use and protection of this existing social and community infrastructure.

The open space lands to the rear however, represent a good opportunity to provide for infill residential development. The lands are accessible from Lawrence Grove and are located a highly accessible location within Clontarf Village and Fairveiw Village and in close proximity to high quality public transport, including the DART. The retention of the Z1 zoning objective is in line with Development Plan Objective QHSN5 and the 15 minute city concept. As such, it is considered that the Z1 zoning should be retained for this part of the lands.

Furthermore, it is noted that the subject site is located in an area well served by existing public open space. It within immediate proximate to the Clontarf Promenade and within a short walking distance of Fairview Park and Bram Stoker Park. The lands, whilst currently open and undeveloped, are not publicly owned. Furthermore, they have poor passive surveillance and are not an ideal location for public open space. In this context, it is considered that the Z1 objective is more appropriate and provides an opportunity to facilitate much needed housing in the city.

Chief Executive's Recommendation

Rezone Church and Childcare facility and community hall to Z15 and retain Z1 zoning to open space to the rear

Map Reference: F-0006
Site Address: Redcourt, Clontarf
Draft Plan Zoning: Z2
Requested Zoning: Z1
CE Recommended Zoning: Z1

Summary

The submission seeks the rezoning from Z2 to Z1 on the basis that the dwelling house that once sat on the site no longer exists and accordingly the appropriateness of the Z2 zoning should be reviewed. Furthermore, planning permission has recently been granted for 131 apartments on the site.

Chief Executive's Response

The site is located within an area of almost exclusively Z1 zoning. The current Z2 zoning of the site related to a use on the site when it previously accommodated a detached 19th century house and gardens. The house was extensively damaged by fire in 2007 and has since been demolished.

The Inspectors Report on the recent permission on the site ABP -311333-21 notes that "there is no unique, special interest/value or historic/architectural interest or character remaining on the site and I would question the appropriateness of this zoning in the present time. It is not making an important contribution to the heritage of the city nor does it make a positive contribution to the streetscape at this location".

As such, having regard to the above, it is appropriate, given its history, the lack of any features of conservation interest on the site, and recent planning approval, that the zoning be amended to Z1 to better reflect its changed status.

Chief Executive's Recommendation

Rezone to Z1.

Map Reference: F-0009

Site Address: Dublin Port – Area Q

Draft Plan Zoning: Z6

Requested Zoning: Z7

CE Recommended Zoning: Z6

Summary

The submission requests that a parcel of land identified as Area Q located on the north side of East Wall Road at the junction with Bond Road, be rezoned from Z6 to Z7. It is submitted that the zoning for this parcel of land should reflect its use and function as part of the wider Dublin port lands and should be rezoned from its current Z6 zoning to Z7.

Chief Executive's Response

The subject lands at Area Q, as defined within the Dublin Port submission, comprise of a series of Z6 zoned lands along East Wall Road. It should be noted that these lands formed part of a proposed variation (No. 25) to the current Development Plan which sought the rezoning of the lands from Z6 to Z10. The variation was not passed, however, the lands to the west of the site are proposed to be rezoned from Z6 to Z10 in response to submissions made on the Draft Plan. In this respect, and having regard to the location of the site outside the main Z7 port lands, it is considered that the existing Z6 zoning is a more appropriate zoning objective to act as a buffer between the mixed use and port related activities.

Chief Executive's Recommendation

Retain Z6 zoning.

Map Reference: F-0011

Site Address: Dublin Port – Area O

Draft Plan Zoning: Z14

Requested Zoning: Z7

CE Recommended Zoning: Z14

Summary

The submission seeks that a parcel of land identified as “Area O” in the Dublin Port submission, located in the south east corner of the Poolbeg West SDZ, be rezoned from Z14 to Z7 as the existing use on the site is a critical element of the port’s 3FM Project and it is integral to the provision of a new 650m container berth to be delivered.

The submission states that if this parcel could not be developed, it would undermine the delivery of the entire 3FM Project which would result in the ultimate capacity objectives of Dublin Port’s Masterplan 2040 not being realised.

Chief Executive’s Response

The subject site is located within the Poolbeg West SDZ and, therefore, the SDZ Planning Scheme is the statutory plan for the area. The entire SDZ lands are zoned Z14 with the objective *“to seek the social, economic and physical development and / or regeneration of an area with mixed use of which residential would be the predominant use”*. The SDZ sets out appropriate land uses in accordance with the Z14 zoning objective. The subject site is designated as “Mixed Use” including “Commercial, Creative Industries, Industrial (including Port Related) Activities” land uses. The SDZ Planning Scheme allows for port related activities at this location. As such it is considered that the rezoning of the lands is not necessary and the future use of the site can be accommodated under the SDZ Planning Scheme land use mix.

Chief Executive’s Recommendation

Retain Z14 zoning.

Map Reference: F-0012

Site Address: Dublin Port - Terminal Yards west of Alexandra Basin and east/north of Berth 51A

Draft Plan Zoning: Unzoned

Requested Zoning: Z7

CE Recommended Zoning: Z7

Summary

The submission identifies two portions of unzoned lands within Dublin Port terminal yard. The submission requests that these lands be zoned Z7 to reflect the location and use of the lands within the Dublin Port estate.

Chief Executive's Response

The unzoned lands within the Port area are mapping anomalies. It is acknowledged that the lands form part of the existing Dublin Port operations. It is, therefore, recommended that the lands be zoned Z7 in accordance with the surrounding port related activities in the area.

Chief Executive's Recommendation

Rezone to Z7.

Map Reference: F-0013

Site Address: Eastpoint Fairview

Draft Plan Zoning: Z6/ Z9/ unzoned

Requested Zoning: Z6 / Z9

CE Recommended Zoning: Z6

Summary

This submission relates to mapping anomalies along the northern boundary of the Eastpoint Business Park. The Z9 zoning which forms part of the coastal pathway encroaches into the existing buildings within the Business Park. As such, it is requested that the zoning boundary be reviewed to accurately reflect the existing buildings on the site.

Chief Executive's Response

The CE acknowledges that there are some mapping anomalies in relation to exact boundaries. It is considered appropriate that the Z6 zoning be refined to ensure that all existing buildings are within this zone and outside the Z9 zone to reflect the pattern of built development on the ground.

Chief Executive's Recommendation

Rezone to Z6 to correct mapping error.

Map Reference: F-0014

Site Address: Eastpoint, Fairview

Draft Plan Zoning: Z6

Requested Zoning: Z6/Z10

CE Recommended Zoning: Z6

Summary

This submission seeks rezoning of lands at East Point Business Park and Eirfreeze, within East Point Business Park, to allow for residential use. It is stated that the subject lands are located in a highly accessible location that can accommodate significant densification for residential uses.

Chief Executive's Response

On foot of objective CEE04 of the current Dublin City Development Plan 2016-2022, a detailed review of all Z6 zoned lands in the city was undertaken to determine which lands had redevelopment potential and would be suitable for a change in zoning to facilitate more compact growth. This resulted in a series of variations to the current 2016 plan, where a number of Z6 lands were rezoned to Z1 and Z10.

As part of the preparation of the Draft Plan, a further review was undertaken of Z6 lands and additional sites are recommended for a change in zoning due to the fact that they were no longer considered optimal locations for employment use.

The CE considers that the remaining Z6 land bank represents the core strategic employment lands in the city. Such lands are an important asset for the city and provide an important local employment function. It is considered that the Eastpoint Business Park is one such location and fulfils a very important economic function in the Docklands/East Wall/Fairview area and as such, it would be inappropriate to rezone the subject site. Furthermore, it is considered that piecemeal and ad-hoc residential development within an existing and well established business park would be contrary to the proper planning and sustainable development of the area.

Chief Executive's Recommendation

Retain Z6 zoning.

Map Reference: F-0015

Site Address: St. Patrick's Boys National School, Cambridge Road, Ringsend

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The DES requests specific protection of the curtilage of school sites.

The subject site adjoins another school site which forms part of an educational complex at this location. The provision of these educational services, together with the wider sports and recreational amenities at Ringsend Park to the south of the site, provide for much needed social and community infrastructure serving the area.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Ringsend area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the Ringsend area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: F-0015

Site Address: St. Patrick's Girls National School, Cambridge Road, Ringsend

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The DES requests specific protection of the curtilage of school sites.

The subject site adjoins another school site which forms part of an educational complex at this location. The provision of these educational services, together with the wider sports and recreational amenities at Ringsend Park to the south of the site, provide for much needed social and community infrastructure serving the area.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Ringsend area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the Ringsend area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: F-0016

Site Address: Star of the Sea Boy's National School, Leahy's Terrace, Sandymount

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The DES requests specific protection of the curtilage of school sites.

The subject site is one of few educational facilities in the Sandymount area. The location of the school is supported by existing sports and recreational facilities to the north of the site at Sean Moore Park and is considered essential community and social infrastructure.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Sandymount area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the Sandymount area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: F-0017

Site Address: St. John the Baptist, Junior Boy's National School, Seafield Road, Clontarf

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The DES requests specific protection of the curtilage of school sites.

In addition, the subject site adjoins another school site which forms part of an educational complex at this location and is thus important social and community infrastructure serving the Clontarf area.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Clontarf area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the Clontarf area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: F-0017

Site Address: St. John the Baptist Infant Girl's School, Seafield Road, Clontarf, Dublin 3

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The DES requests specific protection of the curtilage of school sites.

In addition, the subject site adjoins another school site which forms part of an educational complex at this location and is thus important social and community infrastructure serving the Clontarf area.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Clontarf area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the Clontarf area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: F-0017

Site Address: Belgrove Senior Boy's National School, Seafield Road, Clontarf

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The DES requests specific protection of the curtilage of school sites.

In addition, the subject site adjoins another school site which forms part of an educational complex at this location. The provision of a number of educational services are essential parts of the neighbourhood make up that serves the local community in line with the concept of the 15 minute city.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Clontarf area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the Clontarf area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: F-0017

Site Address: Belgrove Senior Girl's National School, Seafield Road, Clontarf

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The DES requests specific protection of the curtilage of school sites.

In addition, the subject site adjoins another school site which forms part of an educational complex at this location. The provision of a number of educational services are essential parts of the neighbourhood make up that serves the local community in line with the concept of the 15 minute city.

Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Clontarf area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the Clontarf area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: F-0018

Site Address: Maxol Service Station, Cranfield Place, Sandymount, Dublin 4

Draft Plan Zoning: Z1

Requested Zoning: Z15

CE Recommended Zoning: Z1

Summary

This submission seeks the rezoning of the Maxol Service Station and Motor Showroom from Z1 to Z15 to facilitate the future expansion of St. Matthew's School zoned Z15 adjoining to the south. The submission made on behalf of the school considers that the lands at Maxol Service station would be suitable for the expansion of the school should it be required in the future.

Chief Executive's Response

The subject site comprises an existing and operational service station which is zoned Z1 "to protect, provide and improve residential amenities". The main use on Z1 lands is for residential, however, there are other uses that are considered appropriate within Z1 areas such as shops, recreational facilities, local services and infrastructural services, such as service stations to serve the residential community.

The rezoning of the lands to Z15 would be incompatible with the existing and established commercial use of the site and would prevent any future expansion or enhancement of local services on the site. As such, it is recommended that Z1 zoning be retained. It is noted that educational use is a permissible use under the Z1 objective and, therefore, the future development of the lands for educational use, should the lands become available, would not be precluded by the current Z1 objective.

Chief Executive's Recommendation

Retain Z1 zoning.

Map G

| Site Address | Draft Plan Zoning | Requested Zoning | CE Recommendation | Map Sheet | Map Reference |
|---|-------------------|------------------|-------------------|-----------|---------------|
| Scoil Colm, Crumlin | Z15 | Z12 | Z15 | Map G | G-0001 |
| Circle K, Sundrive Road, Kimmage Road Lower Dublin 6W | Z1 | Z3 | Z3 | Map G | G-0002 |
| Ben Dunne Gym and Former Art Gallery, Kimmage Road West | Z9 / Z1 | Z10 | Z10 | Map G | G-0005 |
| Circle K, Westway, Kylemore Road, Inchicore, Dublin 12 | Z6 | Z4 | Z6 | Map G | G-0006 |
| Assumption of the Blessed Virgin Mary, Walkinstown | Z9/Z15 | Z12 | Z9/ Z15 | Map G | G-0007 |
| BOC Gases Bluebell | Z6 | Z6 | Z6 | Map G | G-0008 |
| Brook's Builders Merchants / Naas Road Industrial Estate , Naas Road | Z6 | Z14 | Z14 | Map G | G-0009 |
| Drimnagh Castle Primary School, Long Mile Road, Walkinstown, Dublin 12 | Z15 / Z9 | Z12 | Z15/ Z9 | Map G | G-0010 |
| Marist National School, Clogher Road, Crumlin Dublin 12 | Z15 | Z12 | Z15 | Map G | G-0011 |
| St. Bernadette's, Clogher Road, Dublin 12 | Z15 | Z12 | Z15 | Map G | G-0011 |
| Our Lady of Good counsel Infant NS (Muire Na Dea Chomhairl Infant NS), Mourne Road, Drimnagh, Dublin 12 | Z15 | Z12 | Z15 | Map G | G-0012 |
| Our Lady of Hope School, Armagh Road, Crumlin, Dublin 12 | Z15 | Z12 | Z15 | Map G | G-0013 |
| Scoil Eoin, Armagh Road, Crumlin, Dublin 12 | Z15 | Z12 | Z15 | Map G | G-0014 |
| Scoil Una Naofa, Armagh Road, Crumlin, Dublin 12 | Z15 | Z12 | Z15 | Map G | G-0014 |

| | | | | | |
|--|-----|-----|-----|-------|--------|
| Scoil Mhuire Ogh II, Loreto Junior School, Crumlin Road, Dublin 12 | Z15 | Z12 | Z15 | Map G | G-0015 |
| Assumption Junior School, Walkinstown Dublin 12 | Z15 | Z12 | Z15 | Map G | G-0016 |
| Assumption Senior Girls NS, Walkinstown, Dublin 12 | Z15 | Z12 | Z15 | Map G | G-0017 |
| Our Lady's Hospital School, Crumlin Dublin 12 | Z15 | Z12 | Z15 | Map G | G-0021 |

Map Reference: G-0001

Site Address: Scoil Colm Crumlin

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

Seeks the rezoning to Z12 of site at Scoil Colm, Crumlin (Z15 under Draft Plan) on basis that the school/grounds are surplus to educational requirements of the school. The submission notes that the site has been leased to the DES for use as adult education facility - but may no longer be required by the DES in wider area and may need to be redeveloped for alternative commercial or residential use.

The submission raises issues with a number of commercial / office / residential uses not being permissible under Z15 and fears a resulting risk of site vacancy could impact on the Trust's investment and school improvement activities.

The submission also raises broader concerns with Z15 policy objectives.

Chief Executive's Response

A detailed response to the matter of educational use and to the broader concerns with Z15 policy objectives raised in the submission is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in this particular submission to support the rezoning of this site, or details supporting the stated lack of an ongoing need for the lands by DES, it is considered that they should remain zoned Z15 to protect the essential community and social infrastructure role that they serve.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: G-0002

Site Address: Circle K, Sundrive Road, Kimmage Road Lower, Dublin 6W

Draft Plan Zoning: Z1

Requested Zoning: Z3

CE Recommended Zoning: Z3

Summary

A submission seeks the rezoning of the subject site from Z1 to Z3 to better reflect and not unduly restrict its current use, ongoing operation and future potential development/expansion of the facility.

It states that the proposed Z1 - 'Sustainable Residential Neighbourhoods' zoning objective pertaining to their lands poses a risk to the operation of the service station and could damage its future development prospects.

It also states that the rezoning does not reflect or properly account for the established and permitted commercial use of the site.

Chief Executive's Response

It is considered that a Z3 is a more suitable zoning for the current service station and allows for future expansion or intensification of local services within the site. The role of service stations is adapting and the need for EV charging points will soon overtake the requirement for petrol and diesel pumps. As such, the Z3 zoning provides a more appropriate planning framework for the service station to adopt to changing needs to provide a necessary function in the local community.

Chief Executive's Recommendation

Rezone to Z3.

Map Reference: G-0005

Site Address: Ben Dunne Gym and Former Art Gallery, Kimmage Road West

Draft Plan Zoning: Z1/ Z9

Requested Zoning: Z10

CE Recommended Zoning: Z10

Summary

A submission seeks the rezoning of the Ben Dunne Gym and former Art Gallery on Kimmage Road West from Z9 to Z10. The access road to the site is zoned Z1. The submission states that the lands should be rezoned to allow for an overall development strategy with the residentially zoned lands to the north, which it suggests is to be the subject of a residential planning application in the near future. It is suggested that the subject lands are well-located and comply with relevant compact development and brownfield development objectives.

Chief Executive's Response

The subject site comprises of a gym with a number of smaller ancillary uses also located on the site. A large surface car park occupies the majority of the site. This represents an underutilisation of a well-located site with respect to sustainable transport infrastructure and local facilities. Furthermore, having regard to the Z1 zoning to the immediate north, the rezoning of the lands offers a significant infill development opportunity subject to the preparation of a Masterplan. As such, it is considered that a rezoning to Z10 would facilitate a more mixed-use approach and better help achieve the 15 Minute City objective espoused in the Development Plan.

Chief Executive's Recommendation

Rezone to Z10.

Map Reference: G-0006

Site Address: Circle K, Westway, Kylemore Road, Inchicore, Dublin 12

Draft Plan Zoning: Z6

Requested Zoning: Z4

CE Recommended Zoning: Z6

Summary

A submission seeks the rezoning from Z6 to Z4 of the subject site. It is stated that there is an inconsistency with the existing Z6 zoning and the site's location within a KUV. It is suggested that a Z4 zoning would be more consistent with its KUV designation.

Chief Executive's Response

As previously noted, it is acknowledged that the role of the service station is adapting to facilitate the needs of new electric vehicles and to provide other local services such as laundry, parcel motels etc. However, given the location of the site within an area that is subject to a new Development Framework, it is considered that any rezoning in this regard would be premature pending the outcome of the City Edge Project.

In relation to the KUV, it is recommended to retain the existing boundary as set out on Map K which includes the subject Z6 lands. It should also be noted that the KUV boundary has been extended to include a new opportunity site, which is proposed for rezoning from Z6 to Z14 to the east of the site between the Old Naas Road and Naas Road, see G-0009.

Chief Executive's Recommendation

Retain Z6 zoning.

Map Reference: G-0007

Site Address: Assumption of the Blessed Virgin Mary, Walkinstown

Draft Plan Zoning: Z9/ Z15

Requested Zoning: Z12

CE Recommended Zoning: Z9/Z15

Summary

A submission seeks the rezoning of this church site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services in Walkinstown. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

The site sought for rezoning accommodates a substantial church structure and a large area of open space. The setting of the church in the open space provides an important religious and community services to the Walkinstown local area to which it serves. The open space comprises of a children's playground and grassed lawn areas for passive recreation. The development potential of the sites is considered limited and would likely require demolition of the existing church building or substantial reconfiguration of the site in order to accommodate a meaningful infill development. Furthermore, the large area of open space provides for much needed amenity space to serve the wider community which is considered necessary to retain.

The existing uses on these sites are considered important social and community infrastructure, and having regard to the finite nature of such lands, it is considered appropriate that they are retained for such use. The CE is of the view that church buildings such as this one can potentially be utilised for a variety of ecclesiastical and community purposes. In addition, it is noted that Z15 allows consideration for a number of residential institutional uses and assisted living/retirement accommodation. Should the existing church use become unviable or no longer needed by the Diocese, the opportunity remains to seek a variation to the plan in accordance with the provisions of the zoning objective. As such, in the absence of clear development objectives for the site by the Diocese, the rezoning of the site to Z12 would be premature and would result in a potential loss of community amenities and facilities in the area.

Chief Executive's Recommendation

Retain Z9 / Z15 zoning on the site.

Map Reference: G-0008

Site Address: BOC Gas, Bluebell, Dublin 12

Draft Plan Zoning: Z6

Requested Zoning: Z6

CE Recommended Zoning: Z6

Summary

A submission by the owners of BOC Gas in Bluebell, supports the retention of the Z6 zoning on the site. It also supports the removal of residential use from the Z6 zoning objective. It seeks that the lands at the north-west portion of the KUV designation at the Naas Road/Kylemore Road junction (which adjoins their site) be removed from the KUV area.

Chief Executive's Response

It is considered that the retention of the Z6 zoning is appropriate in this instance pending the outcome of the City Edge Project. The intention of the KUV is to form the core of the overall SDRA and that development be concentrated around the KUV. The subject lands currently comprise of a mix of uses including office, service station, restaurant and café, all of which contribute to the overall objective of the KUV. Therefore, it would be inappropriate to remove the particular site from the KUV designation given its location at a key junction within the SDRA and the existing operational mixed use function of the lands.

Chief Executive's Recommendation

Retain as Z6 and retain boundary of KUV at this location.

Map Reference: G-0009

Site Address: Brooks Builders Merchants, Naas Road Industrial Estate, Naas Road.

Draft Plan Zoning: Z6

Requested Zoning: Z14

CE Recommended Zoning: Z14

Summary

A number of submissions were received in respect of the cluster of Z6 lands, bound by the Old Naas Road to the north, Naas Road to the south, and the Royal Liver Opportunity site to the west. These lands comprise of a number of commercial offices and industrial type warehouse units, including Brooks Timber and Building Supplier, JCDcaux Technical Centre, Naas Road Industrial Park and two former residential units, one of which is a protected structure. It was requested that these lands be considered for rezoning to Z14 to support the overall regeneration of the area having regard to the recently granted developments in the area and the forthcoming City Edge Project.

It was submitted that, the subject lands are suitable for mixed use development, given the location of the lands adjacent to high frequency public transport and the objectives of National Planning Policy to provide for residential accommodation in the existing urban area. It was noted that consolidation of the zoning objective would encourage and facilitate the redevelopment of the area, as would the growth of the SDRA and KUV lands to extend to the northern side of the Naas Road.

Chief Executive's Response

The CE recognises the strategic regeneration potential of these lands and has reviewed the rezoning proposal in the context of the future vision for the area. The lands represent a significant opportunity for large scale mixed use development in a highly accessible location which will enhance and support the recently permitted regeneration projects in the area and which support the core strategy and overarching national planning policy objectives. The lands are located within the Naas Road SDRA which is designated as a specific area for strategic development and regeneration. In addition, the lands also form part of the current Naas Road LAP and the forthcoming City Edge Development Framework.

It is considered that rezoning these lands will provide an opportunity to continue to bring forward development in the area pending the adoption of the City Edge Project. As a result, it is considered necessary to ensure that any future development of these lands support the overall objectives of the City Edge Project and so it is recommended that the subject lands be designated as a future development site within the Naas Road SDRA with specific guiding principles set out for development. The details of the proposed guiding principles are set out in Chapter 13 of the Draft Plan and in the CE Report section addressing Chapter 13.

Furthermore, given the location of the subject lands fronting the Naas Road and the proposed Z14 zoning of the lands it is considered appropriate to extend the KUV along the Naas Road to incorporate this site. The KUV therefore will comprise of the 4 main sites fronting the Naas Road to provide for the natural central core of the area. The KUV will support the consolidation of development along the main routes within the SDRA adjacent to the quality public transport links, providing for mixed use services to serve the local community.

Chief Executive's Recommendation

Rezone to Z14 and extend the boundary of the KUV to include the subject lands.

Map Reference: G-0010

Site Address: Drimnagh Castle Primary School, Long Mile Road, Walkinstown, Dublin 12

Draft Plan Zoning: Z15 / Z9

Requested Zoning: Z12

CE Recommended Zoning: Z15 / Z9

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity. Part of the site is also zoned Z9.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Drimnagh/Walkinstown area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the Drimnagh/Walkinstown area.

Chief Executive's Recommendation

Retain Z15 / Z9 zoning.

Map Reference: G-0011

Site Address: Marist National School, Clogher Road, Crumlin, Dublin 12

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Crumlin area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the Crumlin area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: G-0011

Site Address: St Bernadette's, Clogher Road, Dublin 12

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Crumlin/ Kimmage area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the Crumlin/ Kimmage area.

Chief Executive's Recommendation

Retain Z15 zoning.

.

Map Reference: G-0012

Site Address: Our Lady of Good Counsel Infant NS (Muire na Dea Chomhairle Infant NS),
Mourne Road, Drimnagh, Dublin 12

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Drimnagh/Walkinstown area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the Drimnagh/Walkinstown area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: G-0013

Site Address: Our Lady of Hope School, Armagh Road, Crumlin, Dublin 12

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Crumlin area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the Crumlin area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: G-0014

Site Address: Scoil Eoin, Armagh Road, Crumlin, Dublin 12

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Crumlin area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the Crumlin area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: G-0014

Site Address: Scoil Una Naofa, Armagh Road, Crumlin, Dublin 12

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Crumlin area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the Crumlin area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: G-0015

Site Address: Scoil Mhuire Ogh II, Loreto Junior School, Crumlin Road, Dublin 12

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Crumlin area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the Crumlin area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: G-0016

Site Address: Assumption Junior School, Walkinstown, Dublin 12

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Walkinstown area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the Walkinstown area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: G-0017

Site Address: Assumption Senior Girls NS, Walkinstown, Dublin 12

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Walkinstown area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the Walkinstown area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: G-0021

Site Address: Our Lady's Hospital School, Crumlin, Dublin 12

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within an existing community and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school use is catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support its integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A detailed response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education (DES) has made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The DES requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Crumlin area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the Crumlin area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map H

| Site Address | Draft Plan Zoning | Requested Zoning | CE Recommendation | Map Sheet | Map Reference |
|--|-------------------|--------------------|-------------------|-----------|---------------|
| Rathmines Post Office | Z4 | Z15 | Z4 | Map H | H-0001 |
| Rathmines Library | Z4 | Z15 | Z15 | Map H | H-0002 |
| Rathmines Town Hall, Rathmines Road | Z4 | Z15 | Z15 | Map H | H-0003 |
| Cathal Brugha Barracks | Z15 | Z9 | Z15 | Map H | H-0004 |
| Gulistan Bring Centre, Rathmines | Z4 | Z1 | Z4 | Map H | H-0006 |
| Merrion Graveyard - beside Tara Tower, Merrion Road | Z1 | Z9 | Z9 | Map H | H-0007 |
| Former St. Mary's College, Bloomfield Avenue, Donnybrook, Dublin 4 | Z15 | Z12 | Z12 | Map H | H-0008 |
| Merrion Road, Dublin 4 | Z15 / Z6 | Z12 | Z15 / Z6 | Map H | H-0009 |
| Scully's Field | Z9 | Z9 / Z1 | Z9 | Map H | H-0010 |
| Circle K, Sandford Road | Z1 | Z3 | Z3 | Map H | H-0011 |
| Former Church of Ireland College Educational Lands, Rathmines Road Upper, Dublin 6 | Z9/Z15 | Z1/Z15 or Z12/ Z15 | Z15 | Map H | H-0012 |
| Circle K, Martello, Strand Road, Dublin 4 | Z1 | Z3 | Z3 | Map H | H-0013 |
| Embassy House Lane (Z9 - Z4) and Apartment scheme Herbert Park (Z9 - Z1) | Z9/Z4 | Z4 and Z1 | Z4 | Map H | H-0015 |
| Anglesea Road (along River Dodder) | Z9 | Z1/ Z9 | Z1/ Z9 | Map H | H-0016 |
| Dartry Cottages, Dodder Walk | Z9 | Z1 | Z9 | Map H | H-0017 |
| Energia Park, Donnybrook Road, Dublin 4 | Z9 | Z1 | Z1 / Z9 | Map H | H-0018 |
| St. Clare's, 115-119 Harold's Cross Road, Dublin 6W | Z1/Z9 | Z1 | Z1/ Z9 | Map H | H-0019 |
| 28a Park Avenue, Sandymount, D 4 | Z12 | Z1 | Z12 | Map H | H-0020 |
| St. Clare's Primary School, Harold's Cross Road Harold's Cross Dublin 6W- | Z15 | Z12 | Z15 | Map H | H-0022 |
| Milltown Park, Sandford Road, Dublin 6 | Z15 | Z12 | Z12 | Map H | H-0023 |
| Nullamore House, Richmond Avenue South and Milltown Road, Dartry, Dublin 6 | Z15 | Z12 | Z12 | Map H | H-0024 |
| Harold's Cross NS, Clareville Road, Dublin 6W | Z15 | Z12 | Z15 | Map H | H-0025 |
| Scoil Mologa, Bothar Thigh Chlair Crois Aralid, Baile Atha Cliath 6W | Z15 | Z12 | Z15 | Map H | H-0025 |
| Neville Road / Vernon Grove / Templemore Avenue | Z1 | Z2 | Z2 | Map H | H-0026 |

| | | | | | |
|--|-------------|-----|----------|----------|--------|
| Presentation Primary School Terenure Road West Terenure Dublin 6W | Z15 | Z12 | Z15 | Map H | H-0027 |
| St. Mary's College Junior School 73-79 Lower Rathmines road, Rathmines, Dublin 6 | Z15 | Z12 | Z15 | Map H | H-0028 |
| Scoil Bhride, Bothar Feadha Cuileann Raghnaillach Baile Atha Cliath 6 | Z15 | Z12 | Z15 | Map H | H-0029 |
| Scoil Mhuire, 15 Gilford Road, Sandymount Dublin 4 | Z15 | Z12 | Z15 | Map H | H-0030 |
| St. Conleth's college, 28 Clyde Road, Ballsbridge, Dublin 4 | Z2 | Z12 | Z15 | Map H | H-0031 |
| St. Joseph's Boys NS, Terenure Road East Dublin 6 | Z15 | Z12 | Z15 | Map H | H-0032 |
| St. Louis Infant NS, Williams Park Rathmines, Dublin 6 | Z15 | Z12 | Z15 | Map H | H-0033 |
| St. Louis Senior NS Williams Park Rathmines Dublin 6 | Z15 | Z12 | Z15 | Map H | H-0033 |
| St. Michael's College Junior School, Ailsbury Road, Ballsbridge, Dublin 4 | Z15 / Z2 | Z12 | Z2 / Z15 | Map H | H-0034 |
| St. Peter's Special School, St. John of Golf Centre Lucena Clinic 59 Orwell Road, Rathgar Dublin 6 | Z15 | Z12 | Z15 | Map H | H-0035 |
| Muckcross Park House, Marlborough Road, Donnybrook, Dublin 4 | Z15 | Z1 | Z12 | Map H | H-0036 |
| St. Joseph's, Terenure, Dublin 6 | Z15 | Z12 | Z15 | Map H | H-0037 |

Map Reference: H-0001

Site Address: Rathmines Post Office, Dublin 6.

Draft Plan Zoning: Z4

Requested Zoning: Z15

CE Recommended Zoning: Z4

Summary

A submission seeks a rezoning of the Rathmines Post Office from Z4 to Z15. A concern is expressed that if this building is ever transferred into private ownership that a Z15 zoning would ensure that any inappropriate development would be prevented.

Chief Executive's Response

The Rathmines Post Office is a building of significant architectural and civic merit and is listed on the Record of Protected Structures RPS No. 7168. The protected status of the building offers the requisite protection of its architectural and civic integrity. The Z4 (mixed use) zoning objective applies to the Key Urban Villages in the city, in order to promote vitality through a variety of commercial, retail, community and service uses, and to minimise vacancy. Given the use of the building as and location within the Key Urban Village (KUV), it is considered that the Z4 zoning objective is the most appropriate for the site as it offers a level of flexibility for future potential use that benefits its location within Rathmines KUV.

Chief Executive's Recommendation

Retain Z4 (mixed use) zoning.

Map Reference: H-0002
Site Address: Rathmines Library
Draft Plan Zoning: Z4
Requested Zoning: Z15
CE Recommended Zoning: Z15

Summary

A submission seeks a rezoning of the Rathmines Library from Z4 to Z15. Concern is expressed that if this building was ever transferred into private ownership, that a Z15 zoning would ensure that any inappropriate development would be prevented.

Chief Executive's Response

The Rathmines Library is a building of significant architectural and civic merit and accordingly it is listed on the Record of Protected Structures, RPS No. 7149. The property forms part of a broader cluster of institutional buildings, all of which are zoned Z15. The Z15 zoning seeks to protect community related development such as schools, sports grounds, residential institutions and healthcare institutions. Such facilities are considered essential in order to provide adequate community and social infrastructure commensurate with the delivery of compact growth. It is the policy of the council to promote the retention, protection and enhancement of the city's Z15 lands as they contribute to the creation of vibrant neighbourhoods and a sustainable well connected city. As such, in order to protect its future use and location within the cluster of social and community uses, it is considered that Z15 zoning is more appropriate.

Chief Executive's Recommendation

Rezone to Z15.

Map Reference: H-0003

Site Address: Rathmines Town Hall

Draft Plan Zoning: Z4

Requested Zoning: Z15

CE Recommended Zoning: Z15

Summary

A submission seeks a rezoning of the Rathmines Town Hall from Z4 to Z15. Concern is expressed that if this building ever was transferred into private ownership, that a Z15 zoning would ensure that any inappropriate development would be prevented.

Chief Executive's Response

Rathmines Town Hall is a building of citywide architectural and civic merit and is an iconic landmark within Rathmines and further afield. It is listed on the Record of Protected Structures, RPS No. 7148.

The Z15 zoning seeks to protect community related development such as schools, sports grounds, residential institutions and healthcare institutions. Such facilities are considered essential in order to provide adequate community and social infrastructure commensurate with the delivery of compact growth. It is the policy of the council to promote the retention, protection and enhancement of the city's Z15 lands as they contribute to the creation of vibrant neighbourhoods and a sustainable well connected city. As such, in order to protect its future use and location within the cluster of social and community uses, it is considered that Z15 would be a more appropriate zoning to ensure its continued use for primarily civic, cultural and community purposes.

Chief Executive's Recommendation

Rezone to Z15.

Map Reference: H-0004
Site Address: Cathal Brugha Barracks
Draft Plan Zoning: Z15
Requested Zoning: Z9
CE Recommended Zoning: Z15

Summary

The submission seeks to have the playing fields within the Cathal Brugha Barracks rezoned from Z15 to Z9. It seeks to ensure the future availability of these playing fields to the public. It states that the playing fields at the southern edge of the complex are already in regular use by a number of different clubs and a school. The submission states that the playing fields are the only publicly owned playing fields in the area and asks that more publicly owned outdoor facilities are provided in the area.

Chief Executive's Response

Cathal Brugha Barracks are in continuous active use by the Defence Forces and as such, the Z15 zoning which seeks to protect long established complexes of institutional / community buildings and associated open grounds is considered appropriate.

In relation to playing pitches, the Z15 zoning seeks to protect any existing sports pitches or sports facility on Z15 lands from redevelopment. The Z15 zoning objective seeks that where there is an existing sports pitch facility on Z15 lands which are subject to redevelopment, commensurate sporting/recreational infrastructure will be required to be provided and retained for community use where appropriate as part of any new development. Furthermore, Policy GI49 provides for the protection of existing and established sports and recreational facilities.

It is also an objective of the Development Plan, GIO45, that a study of all playing fields be carried out in order to better measure the use and management of the playing pitches and to examine the level of pitch provision required as a result of population growth. In this respect the provision of playing pitches within these lands is protected and supported through other policies in the plan and a specific Z9 zoning is considered unnecessary and would prevent flexibility, should these lands come forward for redevelopment over the plan period.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: H-0006

Site Address: Gulistan Bring Centre, Rathmines

Draft Plan Zoning: Z4

Requested Zoning: Z1

CE Recommended Zoning: Z4

Summary

The submission requests for a masterplan to be done for Gulistan former Depot and Bring Centre and for the site to be rezoned from Z4 to Z1.

Chief Executive's Response

A masterplan exercise has been undertaken to create a framework for the future redevelopment of the Gulistan Bring Centre, which is in the ownership of Dublin City Council. The masterplan has identified age-friendly and affordable housing as the preferred uses on the site, as well as the development of a primary healthcare facility. These uses are compatible and deliverable under the existing Z4 zoning which forms part of the Rathmines Key Urban Village, where community services, such as healthcare centre are promoted. Accordingly, it is considered that a rezoning is not required in this instance.

Chief Executive's Recommendation

Retain Z4 zoning.

Map Reference: H-0007

Site Address: Merrion Graveyard - beside Tara Tower, Merrion Road

Draft Plan Zoning: Z1

Requested Zoning: Z9

CE Recommended Zoning: Z9

Summary

The submission seeks the rezoning of the Merrion Graveyard, beside the former Tara Tower hotel, from Z1 to Z9. The submission states that this would be in keeping with other graveyards around the city and would help protect the medieval heritage of the site.

Chief Executive's Response

It is considered that a rezoning to Z9 would be appropriate in this instance. It would better reflect the zoning of other similar graveyard sites around the city and facilitate the preservation of its existing use.

Chief Executive's Recommendation

Rezone to Z9.

Map Reference: H-0008

Site Address: Former St. Mary's College, Bloomfield Avenue, Donnybrook, Dublin 4

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z12

Summary

The submission seeks to rezone the subject site from Z15 to Z12. It states that the identified site has been vacant since circa 2007 and is no longer needed for its former institutional use.

The submission states that planning permission was granted for the refurbishment and extension of the buildings on the site for use as a hotel, which is an Open for Consideration use under the Z15 zoning.

The submission notes that under the Draft Development Plan, hotel use is no longer either a Permissible or Open to Consideration use and accordingly, this could potentially limit the ability for the hotel operators to apply for permission to extend or improve the hotel use in the future.

Chief Executive's Response

The current Z15 zoning of the lands seeks to protect existing institutional and community uses. It is acknowledged however, that the institutional use of the subject site is redundant and no longer holds any association with St. Mary's College. Furthermore, it is noted that planning permission has recently been granted on the site for significant redevelopment.

The requested Z12 zoning will allow future redevelopment of the lands while also retaining the open character of the lands. In relation to the building character and setting, the property is listed on the Record of Protected Structures RPS No. 8768 and as such any future development must comply with best practise conservation methods.

As such, it is considered that the Z15 zoning is no longer appropriate for the site as the lands have already been disposed of. It is recommended that the site be rezoned to Z12.

Chief Executive's Recommendation

Rezone to Z12.

Map Reference: H-0009
Site Address: Merrion Road, Dublin 4
Draft Plan Zoning: Z15/Z6
Requested Zoning: Z12
CE Recommended Zoning: Z15/Z6

Summary

The submission by the Religious Sisters of Charity seeks to rezone part of the land currently zoned Z6 and Z15 to Z12. It states that the institutional buildings on the site are physically and functionally obsolete and their institutional use has long ceased.

It also states that the lands are well located with regards to public transport infrastructure and have the capacity to be put to a higher density residential use.

Chief Executive's Response

The subject site and associated lands to the south (now known as Elmpark Green) formerly in the ownership of the Sisters of Charity were considered for rezoning under previous development plan reviews. As part of the rezoning of the overall landholding, the southern part of the lands (Elmpark Green) were rezoned to Z1 and Z6 to accommodate large scale redevelopment comprising of commercial and residential uses, while the northern part of the lands remained as Z15 to accommodate the retention of the religious order and St. Mary's nursing home. A portion of lands to the eastern boundary of the site fronting Merrion Road within the nursing home grounds are also zoned Z6. The Development Plan commitment to provide for additional housing and employment on underutilised institutional lands has already been accommodated on lands to the south and east. Further rezoning and the further erosion of these established institutional lands, long used for social and community infrastructure is, therefore, not considered appropriate in this instance.

Z15 zoning is a diminishing land bank in the city and insufficient rationale has been provided to justify any further rezoning of these lands. There is a strong need for supported living and respite care in the area which has been long established on the subject site at St. Mary's Nursing Home. It is also important to retain sufficient Z15 lands in this area to provide for further consolidation of social and community uses and potentially for the expansion of the hospital adjoining the site.

While the site is currently characterised by low density development, Dublin City Council are supportive of the densification of the site in line with the land uses permissible and open for consideration within Z15 lands. The Z15 zoning allows for a range of community and institutional uses including the provision of housing where it is needed to support and upgrade the wider institutional facility.

In this context, it is considered that there are insufficient grounds to rezone to Z12 and the Z15 zoning is appropriate to protect the long established nature of these lands for medical related uses and social and community infrastructure.

Chief Executive's Recommendation

Retain Z15/Z6 zoning.

Map Reference: H-0010
Site Address: Scully's Field
Draft Plan Zoning: Z9
Requested Zoning: Z9/Z1
CE Recommended Zoning: Z9

Summary

The submission requests part of the subject site be rezoned to Z1 to allow for residential development to take place on the lands. It states that the provision of both Z1 and Z9 zoning would enable the primary objective of the site for amenity space be retained and delivered through the financial supports facilitated by rezoning a portion of the lands to Z1 residential.

Chief Executive's Response

The subject site has been reviewed in the context of flooding. According to the SFRA for the Draft Development Plan, the lands are located in Area Assessment 11. Dodder: Donnybrook Bridge – Dundrum Road. Virtually all of the lands proposed to be rezoned Z1 Residential, are located within Flood Zone A, undefended. The justification test for development plans has been assessed for Area 11 and it was concluded that new development should be located in Flood Zone C and avoid Flood Zone A and B. It is recommended that the site be retained as Z9 in this regard.

Chief Executive's Recommendation

Retain Z9 zoning.

Map Reference: H-0011

Site Address: Circle K, Sandford Road.

Draft Plan Zoning: Z1

Requested Zoning: Z3

CE Recommended Zoning: Z3

Summary

A submission seeks the rezoning of Circle K, Sandford Road service station from Z1 to Z3 on basis of the established/ permitted commercial use and its ongoing operation/ future development potential.

In addition, the submission requests the redrawing of the boundary of the nearby Conservation Area, which encroaches into the existing service station.

Chief Executive's Response

It is considered that the rezoning of the site from Z1 to Z3 zoning is appropriate having regard to the existing use of the site for local services. The Z3 zoning will protect the future development potential to expand the existing facility to cater for additional local neighbourhood centre needs.

In relation to the Architectural Conservation Area, the boundary of the Belmont ACA was considered at the time of making the ACA in 2015, and again in the making of its extension in 2016. The boundary of the ACA went through the statutory public consultation process at the time, including the consideration of submissions made prior to its adoption by the City Council. The boundary of the ACA, therefore will remain as indicated.

Chief Executive's Recommendation

Rezone to Z3.

ACA boundary to be retained.

Map Reference: H-0012

Site Address: Former Church of Ireland College Educational Lands, Rathmines Road Upper, Dublin 6.

Draft Plan Zoning: Z9/Z15

Requested Zoning: Z1/Z15 or Z12/Z15

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of part of the subject site from its current part Z9 –‘Amenity/Open Space Lands/Green Network’ and Z15 –‘Community and Social Infrastructure’ zoning to part Z1 ‘Sustainable Residential Neighbourhoods’ and part Z15 ‘Community and Social Infrastructure’. It is stated that an audit of lands has been carried out and that there is an excess of lands that are not required for church or education use and that an opportunity exists to provide sustainable residential development. The submission also states that if Z1 is not considered appropriate, then Z12 (in part) is sought as an alternative.

Chief Executive’s Response

The subject lands comprise of a number of educational facilities including, a national school and dormitories for the nearby Alexandra College. The site also comprises of large areas of open space and recreational amenities including tennis courts and sports facilities. Whilst it is noted that the overall landholding comprises of excess lands, it is considered that these lands would be best reserved for the possible expansion of the existing educational facility or the provision of an additional educational facility. It is considered that in order to allow lands for the reorganisation of uses as needed on the lands, that the Z9 zoned lands on the site are rezoned to Z15. The Department of Education has specifically noted that additional educational facilities are required in the Milltown/Ranelagh area. As such, given the location of the site in the general area it is considered that the site would be better reserved for educational purposes.

The Department of Education also made a submission which generally highlights the challenges to the Department in developing schools in the city and seeks that support from the City Council regarding the protection of school sites and the review of the existing city plan whereby the future community importance of Z15 lands is emphasised.

Having regard to the above, it is considered that the subject lands should be protected for future educational and community uses and as such the retention of the Z15 zoning is appropriate. It is recommended that in order to allow lands for the reorganisation of uses as needed on the lands, that the Z9 zoned lands on the site are rezoned to Z15.

Chief Executive’s Recommendation

Retain Z15 zoning and rezone Z9 lands to Z15.

Map Reference: H-0013

Site Address: Circle K, Martello, Strand Road, Dublin 4.

Draft Plan Zoning: Z1

Requested Zoning: Z3

CE Recommended Zoning: Z3

Summary

A submission seeks the rezoning of Circle K, Martello service station from Z1 to Z3 on basis of the established/ permitted commercial use and its ongoing operation/ future development potential.

Chief Executive's Response

It is considered that the rezoning of the site from Z1 to Z3 zoning is appropriate having regard to the existing use of the site for local services. The Z3 zoning will protect the future development potential to expand the existing facility to cater for additional local neighbourhood centre needs.

Chief Executive's Recommendation

Rezone to Z3.

Map Reference: H-0015

Site Address: Embassy House and Herbert Park Lane Apartments.

Draft Plan Zoning: Z4/ Z9

Requested Zoning: Z4 and Z1

CE Recommended Zoning: Z4

Summary

The submission requests a change in zoning from Z9 to Z4 and from Z9 to Z1 in respect of Embassy House and Herbert Park Lane Apartments.

In respect of Embassy House, it is suggested that the Z9 zoning on part of the existing development is an anomaly as it cuts through the existing building. It is requested that the Z4 zoning be rationalised in this location to be consistent with the existing building footprint.

In respect of Herbert Park Lane Apartments, it is stated that the Z9 lands to the east of the apartments form part of the residential complex and, therefore, should be zoned Z1. The lands are in use as residential amenity spaces and are located above the basement car park associated with the residential development. As such, the lands do not comprise of public open space and, therefore, should be rezoned from Z9 to Z1.

Chief Executive's Response

In respect of Embassy House, it is acknowledged that part of the Z9 zoning encroaches into the existing building line. As such, it is recommended that this mapping anomaly be rationalised to align with the property boundary.

In respect of Herbert Park Apartments, it is acknowledged that this area is built out, however, the lands are within Flood Zone A and, therefore, it is considered appropriate to retain the Z9 zoning on the lands in line with the appropriate flood management for the area.

Chief Executive's Recommendation

Rezone to Z4 in respect of Embassy House.

Retain Z9 in respect of Herbert Park Lane Apartments.

Map Reference: H-0016

Site Address: Anglesea Road (adjacent to River Dodder)

Draft Plan Zoning: Z9

Requested Zoning: Z1/ Z9

CE Recommended Zoning: Z1/Z9

Summary

This submission requests that the eastern portion of the subject lands are zoned to Z1, while retaining the Z9 zoning on the western portion of the lands closest to the River Dodder. It is suggested that the Z1 rezoning would facilitate residential development on the site. The submission set out a rationale, which includes technical reports and indicative layout, to support the rezoning.

Chief Executive's Response

The CE acknowledges that part of the subject site can facilitate infill residential development and the rezoning of the site from Z9 to Z1 would support the objectives of the 15 minute city to provide for housing in well served accessible urban locations. The subject site has also been considered in the context of flooding and it is recommended that a 15m strip of Z9 zoned lands is retained along the River frontage. The Z9 strip will support flood management at this location and will create an amenity space along the river frontage. In this context, and based on the information provided in the submission, the rezoning of the site is considered appropriate.

Chief Executive's Recommendation

Rezone to Z1.

Retain Z9 (15m buffer along River Dodder frontage).

Map Reference: H-0017

Site Address: Dartry Cottages, Dodder Walk

Draft Plan Zoning: Z9

Requested Zoning: Z1

CE Recommended Zoning: Z9

Summary

The submission seeks to rezone the subject lands from Z9 to Z1. It states that the subject lands have the potential to accommodate residential development, which will assist with meeting the housing needs of Dublin City Council over the Development Plan period. It states the land is suitably mitigated from the risk of flooding, would contribute to the reduction of CO² emissions and would form a natural extension of the Z1 zone on the corner of Dartry Road and Orwell Park.

Chief Executive's Response

The subject site comprises of a number of cottages fronting Dodder Walk. The site is surrounded by extensive tree cover and is located within a Conservation Area. The site also adjoins Dartry Park which is a Z9 zoned landscaped amenity area adjacent to the River Dodder.

The subject site forms part of the wider Z9 lands and contributes to the landscape setting and character of Dartry Park. Z9 zoned lands are important in supporting biodiversity and in supporting nature based surface water management solutions, which is critical in the context of climate change.

Given the unique setting of the subject site and the location within a Conservation Area, it is considered that the Z9 zoning for the site is appropriate to safeguard the landscape character and setting of the area.

Chief Executive's Recommendation

Retain Z9 zoning.

Map Reference: H-0018

Site Address: Energia Park, Donnybrook Road

Draft Plan Zoning: Z9

Requested Zoning: Z1

CE Recommended Zoning: Z1/Z9

Summary

The submission seeks to have two parcels of the subject lands rezoned from Z9 to Z1. The submission states that the lands are underutilised and in this context a rezoning on part of the lands is appropriate in order to facilitate a residential development in the future. It is stated that this is required in order to safeguard the ongoing use of the overall landholding for sporting purposes, for the replacement of the existing pavilion building and to fund the servicing of the outstanding debt for the main stand.

It is stated that neither of the land parcels concerned are currently in amenity or sport related use, nor have they ever been.

Chief Executive's Response

The northern portion of the lands adjoining the River Dodder reads as part of the river landscape; partly lying within a conservation area associated with the river corridor. Given the landscape character and setting of the site, it is not considered appropriate to rezone.

It is acknowledged that precedent exists to facilitate 'enabling development' that would strengthen a sporting organisation's sustainability and ability to continue to grow and improve its facilities and infrastructure. As such, it is considered that part of the subject site, to the south, at the junction of Donnybrook Road and Eglington Terrace should be rezoned to Z1 to support the ongoing operation of the sporting facility. The site is well located with respect to sustainable transport infrastructure and the services available in Donnybrook village centre and, therefore, is appropriate to facilitate residential development.

As such it is recommended that the southern portion of the lands be rezoned to Z1 and the northern portion of the lands remains as Z9.

Chief Executive's Recommendation

Part rezone to Z1, part retain as Z9.

Map Reference: H-0019

Site Address: St. Clare's, 115-119 Harold's Cross Road, Dublin 6W

Draft Plan Zoning: Z1/Z9

Requested Zoning: Z1

CE Recommended Zoning: Z1/Z9

Summary

The submission seeks to rezone part of the subject site from Z9 to Z1. The submission states that the recent planning permission for the site (Reg. Ref. 2186/15, PL29S.245164) has been developed out and that the lands zoned for Z9 in the Draft Plan are a mixture of communal open space and public open space. It states that as some of it is accessible only to residents of the complex it should be considered to be in residential use. On this basis, the submission states that the zoning in the draft Plan is incongruous with the permitted development and should be amended.

Chief Executive's Response

The Chief Executive notes the submission. The lands are zoned Z1 and Z12 under the current Development Plan 2016-2022. Z12 zoned land has a public open space requirement of 20%. It was on this basis that the permitted development was granted, with public open space amounting to 25.9% of the overall site area, according to the submission.

The rezoning of the Z12 lands to Z1 and Z9 in the Draft Plan reflects that the lands are no longer in institutional use; reflects the built out residential and open space development and preserves the integrity of the open space areas provided as part of the development. It is considered that a Z1 zoning of the open space areas provided as part of the development would not offer an appropriate level of open space protection into the future.

Chief Executive's Recommendation

Retain Z1/Z9 zoning.

Map Reference: H-0020

Site Address: 28a Park Avenue, Sandymount

Draft Plan Zoning: Z12

Requested Zoning: Z1

CE Recommended Zoning: Z12

Summary

The submission states that the subject lands once formed part of the broader institutional landholding of the Irish Sisters of Charity Lakelands convent, which sits to the north and east of the subject lands. It was sold off and planning permission granted for a medical practice in 1995. It is stated that it has not been in institutional use since 1995.

In 2001 the then owners of the site acquired another adjoining parcel of land from the convent. The submission also states that the current owners might consider constructing an extension to the surgery as a residence in the future. The submission requests that the site be rezoned to Z1 to better reflect the current and potential future use of the site.

Chief Executive's Response

The Chief Executive notes the submission. It is considered that the site has been in long term community use for medical related purposes. Further, residential is considered a 'Permissible Use' under the Z12 zoning. As such, the current zoning is compatible with the potential future extension of the surgery for residential purposes. Accordingly, it is not considered appropriate to amend the zoning from Z12.

Chief Executive's Recommendation

Retain Z12 zoning.

Map Reference: H-0022

Site Address: St. Clare's Primary School, Harold's Cross Road, Harold's Cross, Dublin 6W.

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A full response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The Department requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Dublin 6 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: H-0023

Site Address: Milltown Park, Sandford, Dublin 6.

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z12

Summary

A submission seeks the rezoning of this 4.26 ha site at Milltown Park, Sandford Road, Dublin 6 from Z15 to Z12. Permission was granted in December 2021 for a residential development on the site comprising 667 no. units. It is stated that the City Council supported the proposal in its report to An Bord Pleanála. It is noted that the proposed amended Z15 zoning is entirely different to the Z15 zoning contained in the existing Development Plan. The submission states that the substantive changes that are now proposed to the current Z15 zoning would have the effect of sterilising the land for development and would constitute an unlawful breach of property rights. The submission outlines that the lands adjoining the subject site are in the ownership of institutions and have a Z15 zoning. It is also noted that the subject site is no longer owned by an institution and, therefore, the proposed zoning prohibits development to any non-institutional owner. As such, it is suggested that the subject site be subject to a Z12 zoning.

Chief Executive's Response

It is acknowledged that planning permission has been granted for a comprehensive redevelopment of the area to provide for a significant number of residential units (ABP Ref: TA29S.311302). It is also noted that the subject lands no longer hold any function associated with the school and have been disposed of into separate ownership. The existing school, Gonzaga College remains within the overall Z15 landholding to the south west of the site and retains sufficient space for its existing sports grounds and any future expansion of the school.

It is noted that the Department of Education have requested that school sites be protected and safeguarded for any future population growth, however, given the circumstances of the subject site, the fact that permission has already been approved and that there still remains sufficient space for the expansion of education facilities within the remains in Z15 lands, it is considered appropriate to rezone the lands to Z12. This rational was supported by the Board in the recent application in which the Inspectors Report states:

"I understand the desire of the Department of Education to urge the protection of Z15 lands in order to provide new school sites, but in the absence of firm data to suggest that there is an undersupply of school places in this specific area of the city, it would be difficult to refuse permission on this basis alone. In fact, the applicant has prepared a school demand study that concludes the proposed development would not significantly increase demand for school places already available in the area. I am satisfied that the applicant has demonstrated the retention of the main institutional and community uses on the remaining lands, including space for school expansion and the provision of new open space on the subject site".

The Z12 zoning will require many of the provisions of Z15 such as 25% open space to be retained and will ensure that the former character and setting of the existing lands is protected in any future development of the lands.

As such, it is considered that Z12 zoning is appropriate for the subject site which will enable future development of the lands whilst also having regard to the landscape character and former institutional use.

Chief Executive's Recommendation

Rezone to Z12.

Map Reference: H-0024

Site Address: Nullamore House, Richmond Avenue South and Milltown Road, Dartry, Dublin 6.

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z12

Summary

A submission seeks the rezoning of this site from Z15 to Z12. The submission states that there is an inconsistency in maintaining the zoning of the former institutional lands as objective 'Z15', considering the changes that have been introduced to the Z15 zoning objective. It is suggested that the 'Z12' zoning objective would ensure that future development potential of this site is not compromised.

Chief Executive's Response

The subject lands form part of a private institution "Opus Dei". The lands do not hold an active social or community use. The designation of the lands as Z15 is, therefore, considered inconsistent with the existing use on the site.

The site itself is highly accessible and is located in an area suitable for redevelopment. The lands are surrounded by established residential uses and are in close proximity to high frequency public transport. The site, therefore, has the ability to contribute to the 15 minute city objective and to provide for additional housing stock in the city. The subject lands do however have a distinctive landscape character and setting which is considered appropriate to retain. As such, it is recommended that the lands be rezoned to Z12 to allow for future development whilst having regard to the surrounding landscape character and context; and to provide for 25% open space in accordance with the Z12 objective.

Chief Executive's Recommendation

Rezoned to Z12.

Map Reference: H-0025

Site Address: Harold's Cross NS, Clareville Road, Dublin 6W

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A full response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The Department requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: H-0025

Site Address: Scoil Mologa, Bothar Thigh Chlair Crois Aralid, Baile Atha Cliath 6W.

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A full response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The Department requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: H-0026

Site Address: Neville Road / Vernon Grove / Templemore Avenue

Draft Plan Zoning: Z1

Requested Zoning: Z2

CE Recommended Zoning: Z2

Summary

A submission seeks the rezoning of Neville Road, Vernon Grove and Templemore Avenue from Z1 to Z2, by virtue of their significant Edwardian and post Edwardian developments of considerable architectural character.

Chief Executive's Response

The subject roads have been reviewed in the context of their architectural design and character. It is noted that Neville Road contains a character and setting which represents a high quality Edwardian streetscape. Vernon Grove and Templemore Avenue comprise of a mix of properties for various eras which do not hold the same quality streetscape as presented on Neville Road.

Z2 residential conservation areas are defined as follows in the Development Plan:

'Residential conservation areas have extensive groupings of buildings and associated open spaces with an attractive quality of architectural design and scale. The overall quality of the area in design and layout terms is such that it requires special care in dealing with development proposals which affect structures in such areas, both protected and non-protected. The general objective for such areas is to protect them from unsuitable new developments or works that would have a negative impact on the amenity or architectural quality of the area.'

As such, having regard to the quality and setting of the streetscape on Neville Road, it is considered appropriate to rezone to Z2. The remaining roads, Vernon Grove and Templemore Avenue are recommended for retention as Z1 residential areas.

Chief Executive's Recommendation

Rezone Neville Road to Z2.

Retain Vernon Grove and Templemore Avenue as Z1.

Map Reference: H-0027

Site Address: Presentation Primary School, Terenure Road West, Terenure, Dublin 6W.

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response:

A full response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The Department requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Dublin 6 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: H-0028

Site Address: St. Mary's College Junior School, 73-79 Lower Rathmines Road, Rathmines, Dublin 6.

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A full response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The Department requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Dublin 6 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: H-0029

Site Address: Scoil Bhride, Bothar Feadha Cuileann, Raghnallach, Baile atha Cliath 6.

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A full response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The Department requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: H-0030

Site Address: Scoil Mhuire, 15 Gilford Road, Sandymount, Dublin 4.

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A full response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The Department requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: H-0031

Site Address: St. Conleth's College, 28 Clyde Road, Ballsbridge, Dublin 4.

Draft Plan Zoning: Z2

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of school sites in the city from Z15 and other zoning designations to Z12. For this particular site, the submission seeks rezoning from Z2 to Z12. The submission notes that school sites are brownfield sites located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on-site with no envisaged expansion plans or future requirements. It is stated that the current zoning objectives unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

In relation to the subject site, it is recommended that the site is rezoned from Z2 to Z15 in order protect educational uses in the area.

A detailed response to the matter of wider educational use and future need is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as development intensifies in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area. The Department explicitly requests specific protection of the curtilage of school sites.

Chief Executives Recommendation

Rezone to Z15

Map Reference: H-0032

Site Address: St. Joseph's Boys NS, Terenure Road East, Dublin 6.

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response:

A full response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The Department requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Dublin 6 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: H-0033

Site Address: St. Louis Infant NS, Williams Park, Rathmines, Dublin 6.

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A full response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The Department requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Dublin 6 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: H-0033

Site Address: St. Louis Senior NS, Williams Park, Rathmines, Dublin 6.

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A full response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The Department requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Dublin 6 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: H-0034

Site Address: St. Michael's College Junior School, Ailesbury Road, Ballsbridge, Dublin 4.

Draft Plan Zoning: Z2/Z15

Requested Zoning: Z12

CE Recommended Zoning: Z2/Z15

Summary:

A submission seeks the rezoning of this school site. The submission notes that it is a brownfield site located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response:

A full response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The Department requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Dublin 6 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z2/Z15 zoning.

Map Reference: H-0035

Site Address: St. Peter's Special School, St. John of God Centre, Lucena Clinic, 59 Orwell Road, Rathgar, Dublin 6.

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A full response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The Department requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Dublin 6 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Map Reference: H-0036

Site Address: Muckross Park House, Marlborough Road, Donnybrook, Dublin 4

Draft Plan Zoning: Z15

Requested Zoning: Z1

CE Recommended Zoning: Z12

Summary

A submission seeks the rezoning of this site from Z15 to Z1. It is stated that the proposed Z15 zoning in the Draft Plan constitutes an entirely new set of development parameters and that there is an inconsistency in the current use/ownership (former convent) and that of the Z15 zoning envisaged in the Draft Plan.

Chief Executive's Response

This Chief Executive notes the submission. The Draft Development Plan has introduced changes to the Z15 zoning in order to safeguard institutional, social and community uses and support the future expansion of such uses, in the context of more intense development occurring throughout the city.

In the context of this site, it is acknowledged that the site is no longer in use as a convent by the Dominican Sisters and that the site was purchased by a private landowner. Having regard to the request to rezone this site to Z1, the Chief Executive considers that an overall holistic approach to the future redevelopment of this site is appropriate, having regard to the adjoining Z15 and Z1 uses. Therefore, in this context, as a former institutional use, it is considered more appropriate that the subject site be rezoned to Z12 (Institutional Land (Future Development Potential)), to take account of the future development potential of the lands, while ensuring that any development is progressed on the basis of a masterplan and that 25% public open space is provided.

Chief Executive's Recommendation

Rezone to Z12.

Map Reference: H-0037

Site Address: St. Joseph's, Terenure, Dublin 6.

Draft Plan Zoning: Z15

Requested Zoning: Z12

CE Recommended Zoning: Z15

Summary

A submission seeks the rezoning of this school site from Z15 to Z12. The submission notes that it is a brownfield site located within existing communities and strategically located in close proximity to high quality transport provision and local services. It is set out that existing school uses are catered for on-site with no envisaged expansion plans or future requirements. It is stated that the Z15 zoning objective unnecessarily restricts consideration of the development potential of the lands and that it is more appropriate to support their integration to the adjoining residential developments in the vicinity.

Chief Executive's Response

A full response to the matter of educational use is set out in the CE response to Chapter 14. This sets out that the Department of Education have made a detailed submission to the Draft Development Plan, highlighting the challenges to the Department in developing schools in the city. Their submission seeks strong and explicit support from the City Council regarding the protection of school sites in the city. The submission in particular notes that as population grows in the city, the most viable and deliverable option to meet expanded requirements of an area is to more intensively develop the sites of the existing schools that serve the area.

The Department requests specific protection of the curtilage of school sites. Having regard to the submission of the Department, and the lack of robust evidence in the submission to support the rezoning of this site in particular, any evidence as to why the Dublin 6 area may not need it in the future, it is considered that it should remain zoned Z15 to protect the essential community and social infrastructure role that it serves in the area.

Chief Executive's Recommendation

Retain Z15 zoning.

Technical and Other Amendments To Zoning and Graphic Maps

Other Submissions Relating to Zoning Maps

Summary

Map Legibility

A submission states that roads, streets and bridge schemes annotated on the maps are difficult to ascertain and calls for clarification of these transport-related mapped objectives.

Base Map Issues

A submission states that Zoning Map E which encompasses the Grangegorman SDZ omits the developments of the east side of the SDZ including the East Quad, Broadstone Plaza and associated extensive public realm.

A submission states that the delineation between the Z14 and Z4 zonings does not take account of the positioning/ layout of the Point Campus student development in the North Docklands and should be updated to reflect the existing built arrangements.

Boundary Issues

A submission states that the SDRA Boundary does not align with the SDZ boundary on Map E.

Transport Mapped Objectives

A submission requests that Zoning Map J include symbols to denote future public transport and all significant interchange points between public transport and cycling.

Another submission calls for the omission of the indicative 'DART +Tunnel' northwards from Spencer Dock on the basis that this delineation no longer forms part of the latest preferred alignment.

A submission seeks the inclusion of an explicit and definitive reference to the Southern Port Access Route on Map F to ensure that objectives included are clear with respect to its delivery. The same submission also highlights a potential mapping error in respect to the mainline rail graphic as it relates to a site in East Wall Road which should extend to Dublin Port.

A submission raises concerns with the Collins Avenue Extension roads objective listed in SMT023 and illustrated on Zoning Map B, and seeks that any plans for a vehicular access be replaced with a pedestrian/ cycle route connection.

Conservation / Archaeology Mapped Objectives

A submission in respect to a site at No. 146A and Nos. 148-148A Richmond Road, Dublin 3 notes that these lands may be subject to an obsolete Conservation Area designation on Map E.

Another submission draws attention to the truncation of the boundary of the city's urban archaeological zone by the frame of Map L.

A submission raises a query in respect to the identity of a circular symbol shown on the Pearse Lyons graveyard (James's Street) on Map E while others queries the placement of certain National Monuments on the Draft Plan maps.

A potential discrepancy between the Zoning Maps and the Written Statement in respect to Architectural Conservation Areas (ACAs), and streets such as Henrietta Street and North Great Georges Street, is raised in one submission.

A submission seeks an amendment to the boundary of the Belmont ACA in order to exclude the Circle K Belmont service station on Sandford Road, Ranelagh.

A further submission seeks the designation of a large area between Phibsborough Road/ Berkeley Road/ Eccles Street/ Dominick Street/ Dorset Street as a conservation area.

Retail/ Community Mapped Objectives

A submission sought that Rathmines Key District Centre (KDC) be better defined on Map H.

Other Map Changes

Issues in respect to the nature, clarity and legibility of the information on each of the Draft Plan zoning maps were raised in a number of submissions with the contents of the legend – land use zoning objectives, specific objectives and footnotes – being the subject of much of the commentary.

Chief Executive's Response

Map Legibility

The CE recommends that Objective SMTO23 in the Draft Written Statement be amended to specifically link the roads, streets and bridges projects listed therein to their respective Zoning Map in order to provide greater clarity and ease of reference (see also Recommendation 7 - Strategic Transport Infrastructure in Chief Executive's response to OPR submission).

Base Map Discrepancies

The 2021 OS Map is the most up-to-date mapping available and has been used as the base for the all the Draft Plan Zoning Maps. Although this map may not reflect the most recent developments within the Grangegorman SDZ, Section 13.10 of Chapter 13 has been amended to fully reflect the growth and development of TU Dublin on the Grangegorman Campus.

The submission regarding Point Campus is noted. However, the development is built out and the Development Plan provides for transitional zone areas under section 14.6. In this context, no amendment is recommended.

Boundary Issues

The SDZ boundary is designated under the statutory provisions as set out in Part IX of the Planning and Development Act 2000, as amended and cannot be amended or reviewed as part of the Development Plan process. The SDZ has been incorporated into the Development Plan objectives and is indicated in a red outlined on Map E. The boundary as shown is consistent with the SDZ designation.

In relation to the SDRA's, these boundaries are shown on Map K and in Chapter 13, rather than clutter the zoning maps.

Transport Mapped Objectives

Draft Plan Zoning Map J 'Existing and Future Transport and Parking Areas' comprehensively addresses the city's 'Future Public Transport' providing the most up-to-date mapped information on the proposed/ indicative alignments for the DART, LUAS, Bus Connects, SPAR and Metrolink projects. Map J also denotes the city's 'Existing Public Transport' and specifies the location of key transport interchanges at Heuston and Connolly Stations. The CE considers that the level of detail provided on Map J is appropriate for a strategic land use plan.

The alignment of the DART+ tunnel illustrated on Map J has been informed by the latest available information from the NTA as per their 'DART Tunnel Route Options and Feasibility Study' published in October 2021. The information on Map J also reflects the alignment contained in the NTA's Draft Transport Strategy for the Greater Dublin Area 2022-2042 (November 2021).

Draft Plan Zoning Map J 'Existing and Future Transport and Parking Areas' denotes the indicative alignment of the 'Southern Port Access Route' (SPAR) and Policy SMT28 (National Road Projects) provides for the reservation of this route. On this basis, the CE considers that the reproduction of the SPAR on Map F would be unnecessary duplication.

The CE recommends that Map J is amended to correct the anomaly in respect to the operational rail line linking the East Wall Road and Dublin Port lands.

The delivery of the Collins Avenue Extension is provided for under Objective SMTO23 (Road, Street and Bridge Schemes). This objective relates to all types of roads and streets, with the scale and typology of road (i.e. vehicular; including potential public transport, or pedestrian) to be determined at detailed design stage in accordance with DMURS following an assessment of the local traffic environment.

Conservation / Archaeology Mapped Objectives

The River Tolka conservation area objective remains a key part of the City Development Plan and is addressed under Policies BHA9 (Conservation Areas) and BHA17 (Industrial Heritage of Waterways, Canals and Rivers). The conservation objective seeks to protect the setting of key built and natural (often historically modified) features that define historic Dublin. Point 3 under Policy BHA9 points to the improvement of open space as part of this policy. This requirement remains relevant to the lands in question along Richmond Road as they directly abut the River Tolka, which is designed with the conservation area objective for its route through the city.

Archaeological mapping anomalies, such as the truncation of the city's urban archaeological zone and the need to correct the location of certain National Monuments, have been dealt with as part of a comprehensive review of Draft Plan Map L and related map changes have been captured on Zoning Maps A-H where relevant. See Chief Executive's Response under Section 11.5.5. Archaeological Heritage.

The circular symbol (illustrating the location of a national monument as per the zoning map legend) was erroneously applied to St James' Graveyard on James's Street and is removed from the Draft Plan. It should be noted that St. James' Church is on the RPS including the curtilage of the graveyard; and that the graveyard is zoned Z9 (open space).

The Draft Development Plan Maps show the 21 no. ACAs that were in place at the time of the adoption of the Dublin City Development Plan 2016-2022. They do not show the additional three

ACAs that were adopted during the lifetime of that plan (Haddon Road/ Victoria Road, Hollybrook Road and North Great George's Street ACAs). The CE recommends that these 3 no. ACA's be added to the Draft Plan maps. Henrietta Street is included in the list of 16 Priority Architectural Conservation Areas (including 1 no. proposed amendment) that will be considered for designation over the period of the new Development Plan.

The boundary of the Belmont ACA was considered at the time of the making of the ACA in 2015, and again in the making of its extension (2016), and went through the statutory public consultation process, including the consideration of written submissions made, prior to its adoption by the City Council. No change is therefore recommended.

The existing red-hatched conservation areas together with the extensive existing and proposed Z2 (Conservation Area) and Z8 (Georgian Conservation Area) zonings in the Broadstone area are considered to constitute sufficient protection at this time.

Retail/ Community Mapped Objectives

Rathmines is defined as a Key Urban Village (No. 7) under the Draft Plan. All KUVs are illustrated on Map K 'Strategic Development and Regeneration Areas'. Please refer to Map K and Chapter 7 for further details.

Other Map Changes

In order to improve the nature and clarity of the information provided on the Draft Plan zoning maps, the CE recommends a number of changes.

Chief Executive's Recommendation:

Map Legibility

See Mapping *Recommendation 7 - Strategic Transport Infrastructure* in response to OPR submission.

Transport Mapped Objectives

Mapping anomaly in respect to East Wall rail line to be corrected on Map J.

Conservation / Archaeology Mapped Objectives

See Chief Executive's Recommendation under Section 11.5.5. Archaeological Heritage in respect to Map L amendments.

Map E to be updated to remove erroneous National Monument symbol on St. James' Graveyard.

Maps E and F to be updated to include Haddon Road/ Victoria Road, Hollybrook Road and North Great Georges Street ACAs.

Other Map Changes

- Update Zoning Maps A-H to illustrate SDZ and LAP boundaries.
- Replace 'Land Use Zoning Objectives' with 'Primary Land Use Zoning Categories' in the Legend of all Draft Plan Zoning Maps A-H.
- 'Zone of Archaeological Interest' be replaced with 'Record of Monuments and Places (RMP)' in all legends.
- The archaeological footnote be updated.

Amended Graphic Maps

Figure 1-3

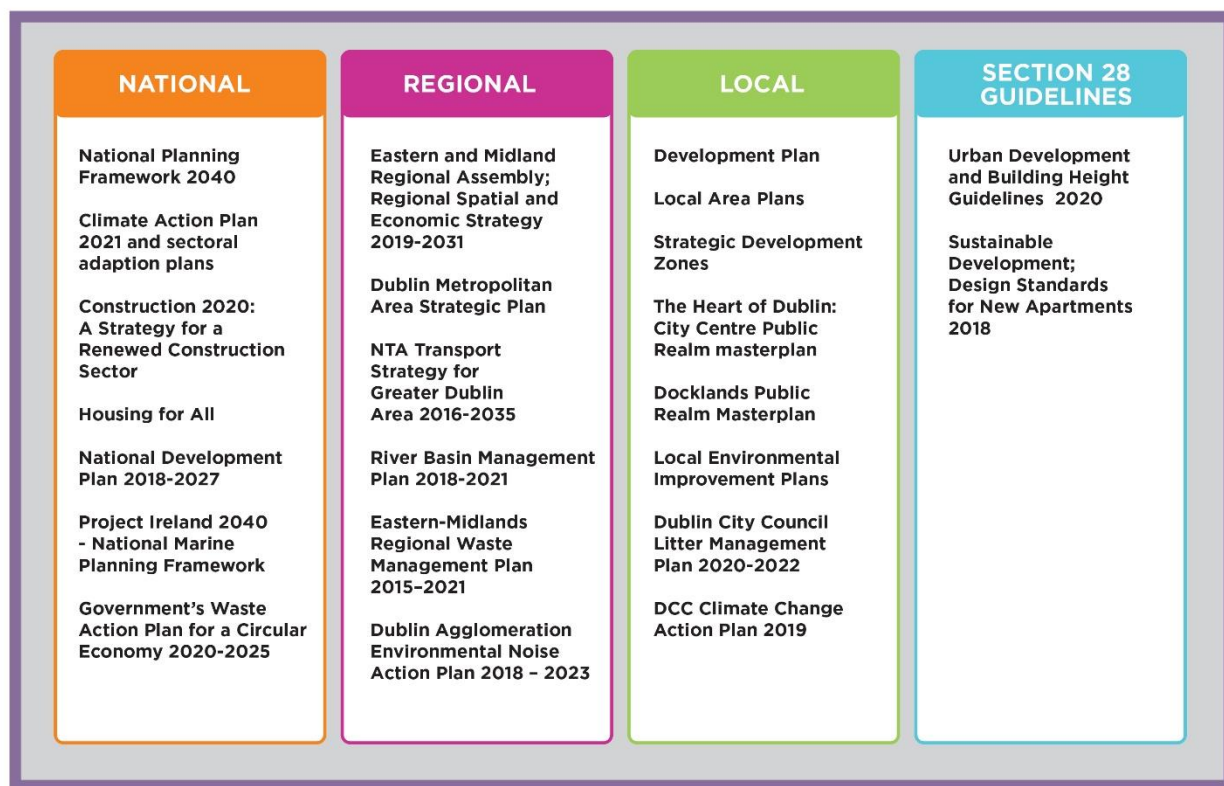


Figure 2-1

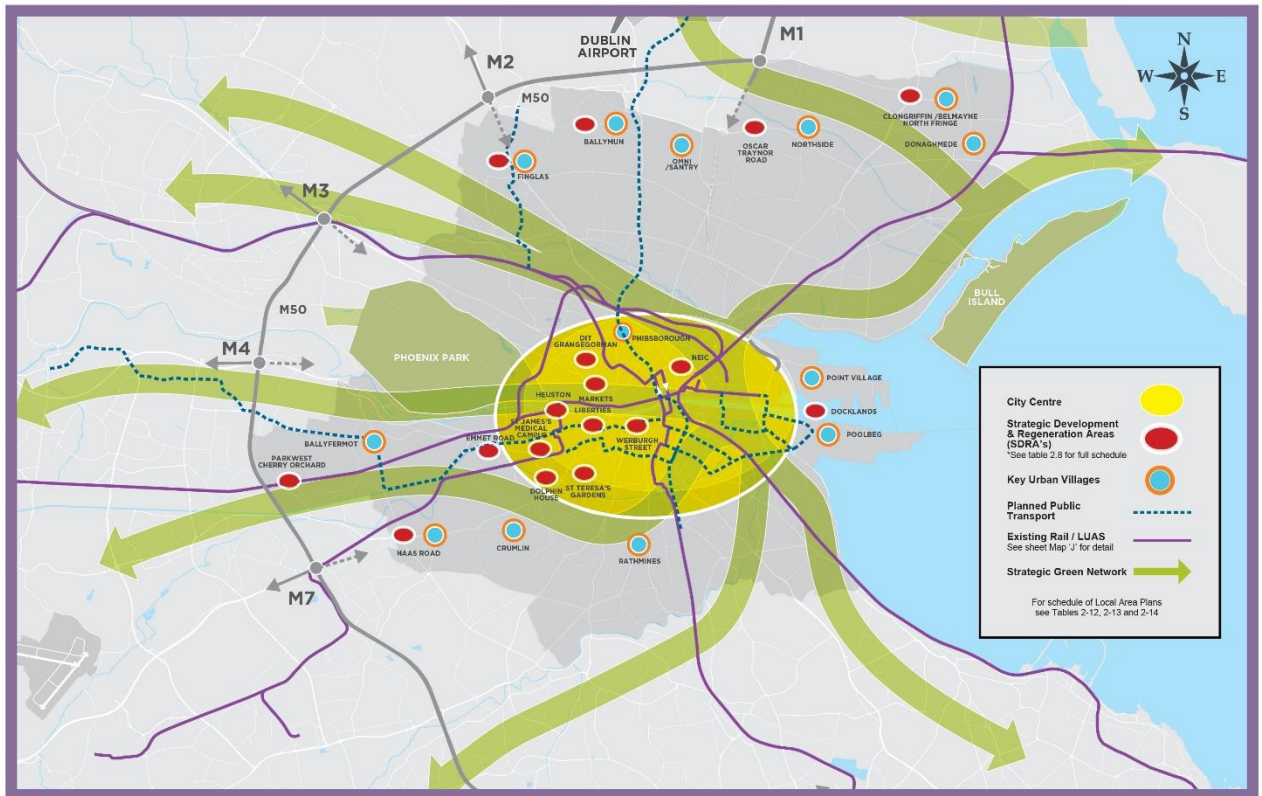
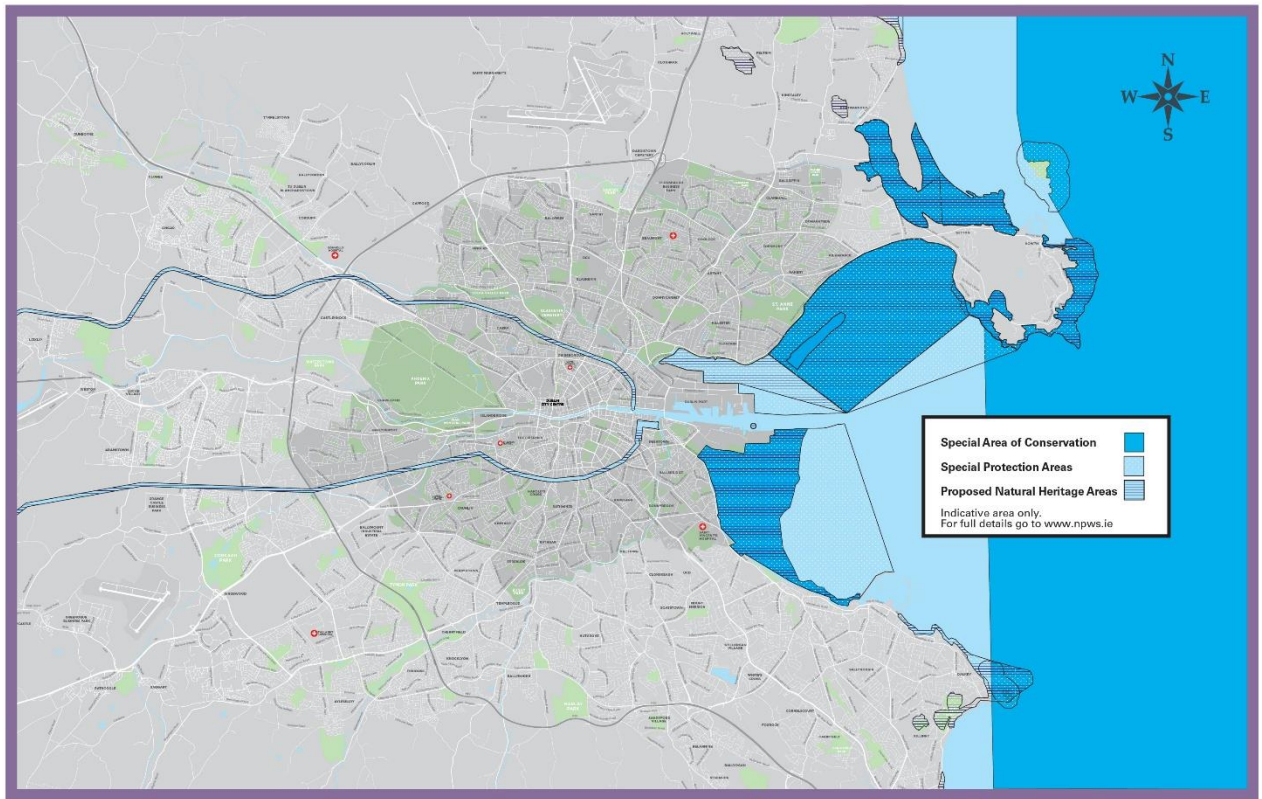


Figure 10.2





Volume 4 - Record of Protected Structures

Volume 4: Record of Protected Structures

Submission Number(s):

0379, 0459, 0637, 0648, 0673, 0693, 0723, 0728, 0896, 0924, 0934, 0970, 1015, 1061, 1084, 1085, 1086, 1087, 1102, 1149, 1167, 1302, 1413, 1448, 1461, 1467, 1477, 1521, 1583, 1678, 1685, 1692, 1699, 1762, 1833, 1841, 1885, 2130, 2135, 2136, 2140, 2141, 2142, 2143

Part 1: Submissions on the proposed Additions and Amendments to the Record of Protected Structures in the Draft Dublin City Development Plan 2016-2022

- RPS No. 838: 57 Bolton Street, Dublin 1
- RPS No. 5268: 34 Molesworth Street, Dublin 2
- RPS No. 2696: 9/10 Eustace Street, Dublin 2
- RPS Nos. 5835 & 8879: North Wall Quay and North Wall Quay Extension, Dublin 1
- RPS No. 6028: 60 O'Connell Street Upper, Dublin 1
- RPS No. 7547: 25-27 Sir John Rogerson's Quay, Dublin 2
- RPS No. 8801: 1 Aungier Street, Dublin 1
- RPS No. 8814: 13 Capel Street, Dublin 1
- RPS No. 8820: 138 Capel Street, Dublin 1
- RPS No. 8823: Chapelizod Weir, Chapelizod, Dublin 12
- RPS No. 8830: Former Central Bank (now known as Central Plaza), Dame Street, Dublin 2
- RPS Nos. 8831, 8832, 8833 and 8834: Echlin Buildings, Blocks A-D, Echlin Street, Dublin 8
- RPS. No. 8849: 4a Henrietta Lane, Dublin 1
- RPS No. 8859: 4b Henrietta Lane, Dublin 1
- RPS Nos. 8851, 8853, 8854, 8855, 8856, 8857, 8858, 8859, 8860, 8861, 8862, 8863, 8864, 8865, 8866, 8867, 8868: Inchicore Railway Works, Inchicore Parade, Inchicore, Dublin 8
- RPS Nos. 8877 and 8878: Former Royal Hospital Infirmary, former Infirmary and former Officer's House, Military Road, Dublin 8
- RPS No. 8886: Grand Canal Graving Docks, South Docks Road, Dublin 4
- RPS No. 8888: RTE, Stillorgan Road, Donnybrook, Dublin 4, Five Buildings at RTE Campus

Part 2: Other Submissions received regarding the Proposed Additions to the RPS of the Draft Plan

Part 3: Submissions Requesting (new) Additions to the Record of Protected Structures

Part 4: Submission Requesting Deletion from the Record of Protected Structures

Part 1: Submissions on the proposed Additions to the Record of Protected Structures in the Draft Dublin City Development Plan 2016-2022

RPS No. 838: 57 Bolton Street, Dublin 1

One submissions received:

- Colm Bodkin (DCC-C38-Draft-1833)

Summary of the Submission and Responses

A summary of the issues raised in the submission and the responses to those issues are provided below:

Issue No. 1

No. 57 was completely destroyed by fire in 1916 and the current building was constructed in 1930.

Response

The destruction of 57 Bolton Street is supported by the Property Losses (Ireland) Committee. This committee was established after Easter 1916 to assess claims for damages to buildings and property as a result of the destruction caused by the Rising. There are four claims in relation to 57 Bolton Street, three of which mention destruction by fire. See below for details of claims.

| Code | Description | Surname | Business | Location | Scope & Content |
|-----------------------------|--|-------------------------|-----------------|-------------------------------|--|
| PLIC/1/0753 | Richard Annesley Walker, agent for Lucy Bourke, 86 Merrion Square, Dublin. | Bourke; Annesley Walker | | Merrion Square; Bolton Street | Claim for £85 for damage to building at 57 Bolton Street, Dublin. See PLIC/1/2666 |
| PLIC/1/2666 | George Frayne, 193 Clonliffe Road, Drumcondra, Dublin. | Frayne | | Clonliffe Road; Bolton Street | Claim for £1,979 10s for destruction of building by fire at 57 Bolton Street, Dublin. Payment of £1,200 recommended by Committee |
| LIC/1/2667 | George Frayne, 193 Clonliffe | Frayne | | Clonliffe Road; | Claim for £470 for destruction of building and |

| | | | | | |
|-----------------------------|---|----------------|--|------------------------------|---|
| | Road, Drumcondra, Dublin. | | | Bolton Street | contents by fire at 57 Bolton Street, Dublin. Full payment recommended by Committee. |
| PLIC/1/3202 | Jane Holmes, 150 Pembroke Road, Dublin. | Holmes; Frayne | | Pembroke Road; Bolton Street | Claim for £1,979 10s for destruction of building by fire at 57 Bolton Street, Dublin. Dealt with under claim by George Frayne, see PLIC/1/2666. |

Source: Property Losses Ireland Committee Records 1916, National Archives:
<http://centenaries.nationalarchives.ie/centenaries/plic/index.jsp>

Issue No. 2

Layout has always been split into two sections and utilised as offices and warehousing. The front three story over basement section facing onto Bolton is the offices and the back two storey part facing onto Yarnhall Street and Henrietta Place is the warehousing.

Response

This was confirmed by the site inspection carried out by the Conservation Section on 1st April 2022.

Issue No. 3

Significant works were undertaken in 1986/87 when part of the ground floor and cellar were repurposed as a public house. This work included replacement of external windows to the rear with mahogany ones. All windows facing Henrietta Place were replaced with aluminium windows or blocked up. Building exterior was sandblasted and repointed apart from the facade on Bolton Street including the interior of the public house. A lift shaft was removed in order to separate access from the public house to the rest of the building, this process replaced the structure and layout of the 1930's stairs going from the cellar to third floor.

Response

A site inspection was carried out by the Conservation Section on the 1st April 2022. This confirmed that in spite of works undertaken during the 1980's, the exterior of the three-story block largely remains unaltered since the 1930's; including retained timber sliding sash windows to the front elevation. However, the interior of the three-story block has been significantly remodeled and retains little fabric of interest, save a leaded vestibule at ground floor and strong room to basement level (reflecting its commercial past).

It is noted that the contiguous two-story warehouse block to Henrietta Place and Yarnhall Street also dates from the 1930's and remains largely intact; retaining robust timber flooring on cast-iron beams and cast-iron columns. Some modification has been undertaken to the ground floor, as part of its reuse as a restaurant.

Issue No. 4

Internally to the front there are no fixtures of historical merit possibly apart from the windows front and side of the three story part of the building. All materials used internally on the three-storey section are of modern materials as these were renovated while works for the public house were being carried out in 1986/87.

Response

Acknowledged in the response above; the interior of the three-story building has been significantly remodeled and retains little fabric of interest, save a leaded vestibule at ground floor and strong room to basement level.

Issue No. 5

The warehousing section may have flooring and structural steelwork which dates back to 1930. This section at present has absolutely no functional use as a warehouse for any future tenants if EJ Bodkin & Co were to cease trading there. The reason for this is that substantial structural work would have to be carried out in order to bring it up to acceptable standards for fire regulations and improve access throughout. Warehousing is no longer useful in the city centre. In order for this part of the building to be functional for modern uses including housing it would either have to be demolished or made into a shell. I believe that if this area of the building has little or no historical architectural merit and if it was recorded as a protected structure that it severely impact it from being developed into a useful structure.

Response

The two-story warehouse block to Henrietta Place and Yarnhall Street is largely unaltered retaining robust timber flooring and cast-iron columns. Some modification has been undertaken to the ground floor, as part of its reuse as a restaurant. Early 20th century steel framed windows to Yarnhall Street have been replaced however, original steel-framed windows, having pivot lights, are retained to the elevations which address the internal yard to the rear of No.58 and 59 Bolton Street.

The two-storey structure to Yarnhall Street is not included as part of any RPS addition at this time. It is acknowledged that the NIAH record and, therefore, the Ministerial Recommendation refers only to the principal corner building at 57 Bolton Street, Dublin 1.

Issue No. 6

The reason this building's facade was listed in the first place is that Eamon Bodkin (EJ Bodkin & Co.) requested it from Dublin Corporation. The reason he made this request it that it was rumoured that the street was to be widened and he was concerned for his premises.

Response

The building was first listed in the Draft Dublin City Development Plan, 1987 (as amended). The protection commenced on the 07/01/1991. It was a List 2 building 'Ground floor shopfront (granite and brick detailing)'. It is noted that Dublin City Council received a Ministerial Recommendation under Section 53 of the Planning and Development Act, 2000 (as amended), for the addition of the three storey building known as 'Bodkin's' (only) on the 4th June 2014. While the date of construction provided by the NIAH is incorrect, the statement regarding the building's contribution to the streetscape remains valid.

Chief Executive's Recommendation

Amendment. It is recommended that the description of the building be changed to reflect the largely modern interior of the main three-story front building at 57 Bolton Street.

Proposed Description in Draft Development Plan

| RPS Ref No | Address | Description |
|------------|-------------------------------|--|
| 838 | 57 Bolton Street, Dublin 1 | (Commercial premises) <u>{Three-storey commercial building to Bolton Street and Yarnhall Street; exterior only.}</u> |

RPS No. 5268: 34 Molesworth Street, Dublin 2

One submission received:

- Coli O'Donoghue of DMOD Architects on behalf of property owner (Hurstview Ltd.) (Ref. DCC-C38-DRAFT-1448)

Summary of Submission and Responses

Summaries of the issues raised in the submission and the responses to those issues are provided below.

Issue No. 1:

The submission is made by the architect who oversaw works to the building under planning application Ref: 1667/89. The submission provides an account of information, pertaining to the historic planning file and indicates that the building was completely demolished, aside from the granite plinth (which had been temporarily removed during works). The submission affirms that the entire brick façade, including the railings, represents new build construction, post-dating 1989. In addition, the submission refers to a review of the property undertaken by Rob Goodbody (Historic Buildings Consultant) which maintains that there is no historical fabric remaining either externally or internally in No. 34 Molesworth Street (The Rob Goodbody report has not been included as part of the submission).

Response

An examination of the planning officer's report on Reg. Ref: 1667/89 confirms the planning authority's intent to retain the front façade of No.34 Molesworth Street, Dublin 2 (then a List 2 structure). However, permission was granted to demolish and rebuild the façade, following acceptance of a structural assessment. It is understood that the façade was rebuilt as per the plans and particulars of Reg. Ref: 1667/89. An internal and external inspection of 34 Molesworth Street was carried out by the Conservation Section on the 01/04/2022, in the presence of Mr. Coli O'Donoghue; the architect who oversaw works to the building under planning application Ref: 1667/89. This indicated that only a section of the granite plinth wall, and the brick vaults (beneath the public pavement), survived the redevelopment of the site c.1989.

Issue No. 2

The submission states that No.34 Molesworth Street, Dublin 2 was omitted from the 1991 Dublin City Development Plan as a 'List 2' structure following planning decision Reg:1667/89 and claims that the building was re-entered in error as a 'List 2' structure on the 1999 Dublin City Development Plan.

Response

Dublin City Council cannot confirm the circumstances stated in the submission, as there are limited pre-2000 records relating to former List 1 and List 2 structures. From 1st January 2000, the structure was defined as a protected structure within the meaning of the Local Government (Planning and Development) Act 1999 with notification issued to the owner of the property on 25/04/2000.

Chief Executive's Recommendation

Amendment. It is recommended that the description as originally provided in the public notices be amended as follows:

Proposed Description in Draft Development Plan

| RPS Ref No. | Address | Description |
|-------------|-----------------------------------|--|
| 5268 | 34 Molesworth Street, Dublin 2 | (Front façade only including entrance steps, plinth wall and railings) <u>{Historic granite plinth wall to basement and brick vaults beneath pavement}</u> |

RPS No. 2696: 9/10 Eustace Street, Dublin 2

One submission received

- Suzanne Cosentino (DCC-C38-Draft-924)

Summary of Submission and Responses

Summaries of the issues raised in the submission and the responses to those issues are provided below.

Issue No. 1

The structure was previously assessed when the system of protected structures was created in 2000, the building was found to be worthy of façade protection only. Furthermore, assessment under the National Inventory of Architectural Heritage would have been carried out and led to a similar conclusion.

Response

The building was first proposed for listing in the Draft Dublin City Development Plan, 1987 and the listing commenced on the 07/01/1991, as a List 2 'Façade'. The Local Government (Planning and Development) Act, 1999 and the Planning and Development Act, 2000 (as amended) introduced 'protected structures', and in the process transferred all 'listed buildings' onto the Record of Protected Structures. The National Inventory of Architectural Heritage (NIAH) assessed the building in 2015 and assigned it a 'Regional' rating.

Subsequently, a Ministerial Recommendation was received by the City Council on the 9th of August 2017 for the addition of the building to the RPS in accordance with Section 53 of the Act.

Issue No. 2

The protected structures legislation enables a local authority to thoroughly assess a proposed protected structure and list for protection elements of that structure which are of architectural merit. In the case of this structure, is it clear that the staircase is a good example of a mid-18th century galleried staircase. What remains of the brick vaults that once stretched back to Sycamore Street but were mostly demolished to create the National Gallery of Photography also merit spot-listing. There are two original period fireplaces and two original ceiling roses in the 15 rooms with windows from ground to third floor, due to the 20th century renovation interventions no more than those items appear worthy of protection.

Response

The alteration and adaptation of buildings over the course of a long history, such as that of 9/10 Eustace Street, is relatively common and may not seriously impact on their overall architectural significance. Such changes can often be read as layers of historic evidence, and can aid the understanding of the history of the building and the area over time. Nos. 9-10 Eustace Street are shown on Rocque's map as two separate dwellings which were amalgamated for commercial use in the mid-19th century. While this change impacted the

18th century fabric, it also left interesting surviving evidence of the use, including the large commercial safe in the building.

In relation to the suggestion to limit protection to just specific elements of the structure, the Architectural Heritage Protection Guidelines 2011 state that “where only a part of a structure is currently listed for protection, consideration should be given to extending protection to the entire structure. For example, where the protected structure is a plaque, a shopfront or a façade, the entire structure of which the element is part may also be of interest and worthy of protection. The protection of a façade alone should generally only be considered where there is no surviving interior of any interest, for example where the building has previously been gutted and the façade is the only remaining feature of the original historic building” (DHLG&H 2011, p. 24).

The property was inspected on 01/04/2022 by the Conservation Section, which confirmed the survival of historic fabric. In the case of 9/10 Eustace Street, the following survives intact: much of the original open-well, closed-string staircase with a heavy, scrolled and ramped handrail to No. 9; decorative plasterwork survives to ground floor rooms of the original numbers 9/10 and also to some of the other floors; historic joinery including lugged-and-kneed door architraves to first half-landing of number 10 with historic floorboards surviving in places; a 19th century safe survives to the rear ground floor room of number 9 reflecting the evolution of the building in the 19th century, elements of the original floor-plan also survive including vaulted cellars.

A previous inspection in early 2014 by a Conservation Officer also noted the survival of large structural beams which are typical of the early to mid-18th century; see the Conservation Officer’s Report on the planning application Reg. Ref: 3619/13.

Issue No. 3

Many renovations and programme of works have affected this building, meaning that very little of its original fabric is left. Among the various renovations which took place you have:

- a) Early 20th century renovation: Replacement of the windows;
- b) 1970's renovation: a number of significant interventions were made to the building, including the insertion of a portacabin in the hall, subdivision of rooms, the doors all had yale locks added, insertion of suspended ceilings and the fitting of plastic beauty board to a number walls on the upper floors;
- c) 1990's renovation: the roof was replaced and many of the original floorboards as well as most of the windows were replaced and the rear elevation at ground floor was comprehensively altered; and
- d) 2010's refurbishment: the building was brought up to modern compliance standards with fire compartmentalisation and life safety systems added, in tandem more sympathetic finishes were delivered with damaged plasterwork repaired and traditional floor finishes reinstated and replacements found for some of the missing fireplaces.

Response

It is accepted that past works have had some impact on the building. However, sufficient historic fabric remains within the structure to justify its architectural interest and the ‘Regional’ significance assigned to it by the NIAH. 9/10 Eustace Street is also an integral part of this historic streetscape, which developed in-tandem with the city quays as a busy

mercantile quarter of 18th century Dublin, centred on the original Custom House, near Essex Bridge (now Grattan Bridge).

It is considered that recent works to the structure have generally respected the architectural character and historical significance of the building.

Issue No. 4

It is, therefore, felt that, on the basis:

1. Of previous inspections having found that facade protection only was appropriate; and
2. In light of the council decision to ignore its ability to spot list the only specific elements of merit in a structure to have survived;

placing the obligation on the owner to comply with all the legislation that the protected structures regime would impose on owning and funding the ongoing upkeep of this building is disproportionate to the amount of the building that is worth protecting and so onerous that it could put the proper upkeep and maintenance of the building in danger, which would be counterproductive.

Response

There is no record of a previous inspection of the property which agreed with the protection to remain as 'Façade' since it was first protected in 1987. The NIAH assessed the building in 2015 and assigned the building a 'Regional' rating. On the 9th of August 2017, a Ministerial Recommendation was received by the City Council for the addition of the building on its RPS, in accordance with Section 53 of the Planning and Development Act, 2000 (as amended).

Section 51 of the Act requires that every Development Plan shall include a record of protected structures, and shall include in that record every structure which is, in the opinion of the planning authority, of such (special architectural, historical, archaeological, artistic, cultural, scientific, social or technical) interest within its functional area.

Furthermore, under Section 53(2) the planning authority shall have regard to any recommendation made by the Minister regarding the inclusion in its record of particular structures or parts of structures or specific features within the grounds of structures, in its RPS.

9/10 Eustace Street, Dublin 1, is considered by the NIAH to be of special Architectural, Artistic and Social interest, in accordance with the provisions of Section 51 of the Act.

Chief Executive's Recommendation

No change. It is recommended that the structure is added to the RPS with the description provided in the public notices.

RPS Nos. 5835 & 8879: North Wall Quay and North Wall Quay Extension, Dublin 1

One submission was received

- Dublin Port (DCC-C38-Draft-1448)

Summary of Submission and Response

Summary

RPS 5835 & 8879: Dublin Port Company notes addition of North Wall Quay to the RPS. Proposals required to facilitate access to the southern port lands are likely to necessitate infrastructure interventions on the North Wall Quay extension. Such proposals will need to consider the heritage value of the quay wall and these proposals will need to be dealt with in a pragmatic manner. Dublin Port Company supports the inclusion of an explicit and definitive reference to the SPAR crossing on Map F as provided on Map J to ensure that policies and objectives included in the new Development Plan are clear with respect to its delivery notwithstanding the heritage value and status of the North Wall Quay extension.

Response

The submission from Dublin Port Company regarding the proposed protection of the North Wall Quay extension is noted. Dublin City Council fully supports and recognises the nationally significant role of Dublin Port and the need to maintain and improve port related facilities. Proposals for significant alterations to existing port infrastructure and those for new infrastructure, will be the subject of one or more applications for planning permission, which will be assessed on their merits in the development management process, having regard to the relevant material considerations, including the provisions of the Dublin City Development Plan at that time.

The submission relating to the mapping request has been addressed in the Volume 3 section of the CE report.

Chief Executive's Recommendation

No change. It is recommended that the structures be added to the RPS with the description provided in the public notices.

RPS No. 6028: 60 O'Connell Street Upper, Dublin 1

One submission received

- Irish Rail on behalf of the property owner (Dublin Bus and CIE) (Ref. DCC-C38-DRAFT-970)

Summary of Submission and Response

Summary

The submission accepts the reasoning for the proposed clarification in principle however, states that 'the special interest categories assigned to the property could not be considered to extend to the two-storey annex, external area and boundary wall at Henry Place'. The submission requests exclusion of these elements from the RPS entry and suggests a revised proposed description to read 'Commercial premises- excluding basement and ground floor annex, external areas and boundary wall at Henry Place, all to the rear of the property'.

A plan drawing of the site has been included illustrating the area to the rear site which the submission requests is excluded from protection. The submission draws attention to planning file ref: 2479/08 and ref: 2479/08x1 which permit the demolition of non-original additions to the rear of the property and includes an excerpt from Brian O'Connell Associates Conservation Report on the property dated 2007 (submitted in support of Planning file ref: 2479/08) as well as recent images which it attests illustrates that there is little of architectural or artistic interest to the rear return. The submission concludes that revision of the entry will ensure that the proposed amendment of current entry for No. 60 O'Connell Street Upper will not negatively impact the potential for future development to the rear of the site.

Response

The planning application documents submitted with Reg. Refs: 2479/08 and 2479/08x1 and the Conservation Report by Brian O'Connell Associates, submitted with the former, have been considered as part of the assessment by the Conservation Section.

It is noted that by Order No. 2454 of 21 July 2016, the duration of the grant of planning permission above was extended until 6 May 2022; 2479/08x1. Therefore, the provisions of the current grant of planning permission remain in force in the event of the adoption of the proposed amendment of the description for the protected structure, until such time as the extension of duration expires.

Should the amendment be adopted, proposals for the carrying out of development and/or works to the subject property that would not come within the meaning of Section 4(1)(h) and Section 57 of the Planning and Development Act, 2000 (as amended), would require planning permission.

Section 57 of the Planning and Development Act 2000 (as amended) enables the owner or occupier of a Protected Structure to make a written request to the planning authority for a declaration which, would provide more precise details of the nature and extent of protection (subject to inspection of the premises), and set out those works which would or would not be exempted development in the opinion of the planning authority.

Simply omitting the rear structures from the proposed description (amendment) would not mean that future proposals for their demolition and redevelopment would avoid the need to obtain planning permission, given other provisions of the Planning and Development Act and Regulations currently in place. In that event, the planning application would be assessed on its merits, having regard to the relevant material considerations at the time, including the provisions of the Dublin City Development Plan.

Chief Executive's Recommendation

No change. It is recommended that the wording of the amended description remains as stated in the public notices.

RPS No. 7547: 25-27 Sir John Rogerson's Quay, Dublin 2

One submission received

- Marlet Property Group DCC-C38-DRAFT-1521

Summary of Submission and Response

Summary

We...fully support the clarification such that the Proposed Record RPS Ref. 7547 will state the correct address of 25-27 Sir John Rogerson's Quay, Dublin 2. Submission notes that the address on letter was incorrect and asks that the correct address be included in RPS.

Response

The RPS listing for the subject structure was updated to include the correct address. The address on the notification letter referred to the previous listing for the entry.

Chief Executive's Recommendation

No change. It is recommended that the wording of the amended description remains as stated in the public notices.

RPS No. 8801: 1 Aungier Street, Dublin 2

One submission received

- Tadhg Sullivan (DCC-C38-Draft-459)

Summary of Submission and Responses

Summaries of the issues raised in the submission and the responses to those issues are provided below.

Issue No. 1

The Building is not Regionally Rated: Objection to this listing on the basis that I do not believe the council have assessed the building correctly in classifying the building as “Regional Rating “under the National Inventory of Architectural Heritage” and the report stating same is flawed.

Response

The National Inventory of Architectural Heritage (NIAH) assessed the building on the 2nd September 2014 as part of its survey of Dublin City and assigned the building a ‘Regional’ rating. The NIAH was established in 1999 as a statutory body on behalf of the Minister (currently) for Housing, Local Government & Heritage. Its survey of the city is being undertaken in a number of phases, which are sequentially published by the Department (DHLGH), to assist Dublin City Council in the maintenance of a comprehensive Record of Protected Structures (RPS).

Section 51 of the Planning and Development Act, 2000 (as amended) requires that every Development Plan shall include a Record of Protected Structures, and shall include in that record every structure which is, in the opinion of the planning authority, of such (special architectural, historical, archaeological, artistic, cultural, scientific, social or technical) interest within its functional area.

On the 28th June 2018, Dublin City Council received a Ministerial Recommendation, issued under Section 53 of the Act, for the addition of the building at 1 Aungier Street (including 20 Stephen Street Lower), Dublin 2, to its RPS. The NIAH assigned the building a category of special ‘Architectural & Social’ interest, in accordance with Section 51 of the Act; noting that it comprises ‘*A substantial corner building that makes a significant contribution to the streetscape, acting as a marker of the entrance to Aungier Street*’.

Under Section 53(2) of the Act, Dublin City Council shall have regard to any recommendation made by the Minister regarding the inclusion in its record of particular structures or parts of structures or specific features within the grounds of structures, in its RPS.

The Conservation Section, following an external inspection of the site on 9th November 2021, considered the Ministerial Recommendation and the NIAH record and concurs with the category of special interest assigned to 1 Aungier Street (including 20 Stephen Street Lower), Dublin 2.

Issue No. 2

The building has no specific features only that it is located on a corner site of Aungier Street. Listing of Buildings as protected structures based on their position alone is not justification.

Response

While modest, the design of the building with its chamfered corner bay has a commanding presence at this cross roads and is considered to successfully stitch this corner of Aungier Street and Stephen Street Lower. Despite recent alterations, the building does retain items of architectural interest to the interior.

Section 51 of the Planning and Development Act, 2000 (as amended) requires that every Development Plan shall include a Record of Protected Structures, and shall include in that record every structure which is, in the opinion of the planning authority, of such (special architectural, historical, archaeological, artistic, cultural, scientific, social or technical) interest within its functional area.

On the 28th June 2018, Dublin City Council received a Ministerial Recommendation, issued under Section 53 of the Act, for the addition of the building at 1 Aungier Street (including 20 Stephen Street Lower), Dublin 2, to its RPS. The NIAH assigned the building a category of special 'Architectural & Social' interest, in accordance with Section 51 of the Act; noting that it comprises '*A substantial corner building that makes a significant contribution to the streetscape, acting as a marker of the entrance to Aungier Street*'.

Under Section 53(2) of the Act, Dublin City Council shall have regard to any recommendation made by the Minister regarding the inclusion in its record of particular structures or parts of structures or specific features within the grounds of structures, in its RPS.

Issue No 3

If the council wish to retain the height and general structure of the building, should it ever be considered for redevelopment, then the council can rely on the planning process to maintain the said nature, height and general aesthetic of the corner site of Aungier Street.

Response

The Conservation Section of Dublin City Council concurs with the NIAH assignment of a 'Regional' rating to this structure. These are structures or sites that make a significant contribution to the architectural heritage within their region or area. They also stand in comparison with similar structures or sites in other regions or areas within Ireland. Examples would include many Georgian terraces; Nenagh Courthouse, Co. Tipperary; or the Bailey Lighthouse, Howth. Increasingly, structures that need to be protected include structures or sites that make a significant contribution to the architectural heritage within their own locality. Examples of these would include modest terraces and timber shopfronts.

Section 57 of the Planning and Development Act 2000 (as amended) enables the owner or occupier of a Protected Structure to make a written request to the planning authority for a declaration which, would provide more precise details of the nature and extent of protection

(subject to inspection of the premises), and set out those works which would or would not be exempted development in the opinion of the planning authority.

Issue No. 4

The subject structure is not located within an Architectural Conservation Area.

Response

Acknowledged. Aungier Street is not situated in a designated, statutory Architectural Conservation Area (ACA).

Issue No. 5

The building is not an old/historic building: The building in question is just over 100 years old and contains no special features from an architectural standpoint. The building was a tenement, housing some 43 people with three toilets up to the 1980s when it was converted into office use. The interior of the building has been refurbished in line with the living city incentive scheme over the last few years and brought up to current regulations where possible with replacement windows, new insulation and lining to all walls, new heat pump heating, and full replacement of the electrical services etc. with some of these works ongoing at this time, therefore the only retained original feature is the blockworks façade.

Response

Section 51 of the Planning and Development Act, 2000 (as amended) requires that every Development Plan shall include a Record of Protected Structures, and shall include in that record every structure which is, in the opinion of the planning authority, of such (special architectural, historical, archaeological, artistic, cultural, scientific, social or technical) interest within its functional area.

On the 28th June 2018, Dublin City Council received a Ministerial Recommendation, issued under Section 53 of the Act, for the addition of the building at t1 Aungier Street (including 20 Stephen Street Lower), Dublin 2, to its RPS. The NIAH assigned the building a category of special 'Architectural & Social' interest, in accordance with Section 51 of the Act; noting that it comprises '*A substantial corner building that makes a significant contribution to the streetscape, acting as a marker of the entrance to Aungier Street*'.

Under Section 53(2) of the Act, Dublin City Council shall have regard to any recommendation made by the Minister regarding the inclusion in its record of particular structures or parts of structures or specific features within the grounds of structures, in its RPS.

The Conservation Section, following an external inspection of the site on 9th November 2021, considered the Ministerial Recommendation and the NIAH record and concurs with the category of special interest assigned to 1 Aungier Street (including 20 Stephen Street Lower), Dublin 2. While it is acknowledged that recent works have stripped much of the historic fabric (with the exception of two rooms at the top floor), the original concrete stairs survives, with surviving modest timber handrail and metal balusters, similar to earlier granite staircases found in tenement housing in Dublin 8.

Issue No. 6

All windows, internal fittings and shopfronts are new in the last four years.

Response

The top floor retains two rooms with surviving timber sash windows, skirting boards, two timber panelled doors with architraves and a simple cast-iron fireplace. A further sash window survives at roof level within the stairwell pop out. The original staircase also survives.

Issue No. 7

The Draft Development Plan 2022-2028 issued by Dublin City Council recommends this addition to the PRS on the basis that it is of Regional significance and deemed worthy of inclusion on the RPS. The NIAH has assigned 1 Aungier Street (including 20 Stephen Street Lower), Dublin 2 a regional rating. The NIAH in its 2021 handbook clarifies the meaning of its designation as follows: REGIONAL R: Structures or sites that make a significant contribution to the architectural heritage within their region or area. They also stand in comparison with similar structures or sites in other regions or areas within Ireland. Examples would include many Georgian terraces; Nenagh Courthouse, Co. Tipperary; or the Bailey Lighthouse, Howth. Increasingly, structures that need to be protected include structures or sites that make a significant contribution to the architectural heritage within their own locality. Examples of these would include modest terraces and timber shopfronts.

Response

Regionally rated buildings in a Dublin context also include more modest structures of architectural and social interest such as that at 1 Aungier Street. As already noted above and stated in Issue No. 7 *“Increasingly, structures that need to be protected include structures or sites that make a significant contribution to the architectural heritage within their own locality. Examples of these would include modest terraces and timber shopfronts”*.

On the 28th June 2018, Dublin City Council received a Ministerial Recommendation, issued under Section 53 of the Act, for the addition of the building at 1 Aungier Street (including 20 Stephen Street Lower), Dublin 2, to its RPS. The NIAH assigned the building a category of special ‘Architectural & Social’ interest, in accordance with Section 51 of the Act; noting that it comprises *‘A substantial corner building that makes a significant contribution to the streetscape, acting as a marker of the entrance to Aungier Street’*.

Submission Issue No. 8

Provision of detailed and reasonable explanation as to why the building is considered of Regional significance. What elements of the structure provide a significant contribution to the architectural heritage within the area and resulting from this what areas of the building are being considered for listing.

Response

The NIAH assigned the building a category of special ‘Architectural & Social’ interest, in accordance with Section 51 of the Act; noting that it comprises *‘A substantial corner building that makes a significant contribution to the streetscape, acting as a marker of the entrance to*

Aungier Street. It successfully stitches together two streets and has a commanding presence at this busy crossroads; - details of the NIAH record are provided in the proposed addition report prepared for the Draft Plan public display'. The Conservation Section also highlight the surviving plan form (or layout) of the upper floors, the light well, the stairs with its associated handrail and metal balustrade, the chimneybreasts, the upper floor with its surviving timber sash windows, skirtings, timber floorboards, two doors, cast-iron fireplace and roof top chimneystacks.

Section 57 of the Planning and Development Act 2000 (as amended) enables the owner or occupier of a Protected Structure to make a written request to the planning authority for a declaration which, would provide more precise details of the nature and extent of protection (subject to inspection of the premises), and set out those works which would or would not be exempted development in the opinion of the planning authority.

Dublin City Council administers a number of grant funding schemes on behalf of the Department of Housing, Local Government and Heritage which provide financial support to owners and occupiers of protected structures in the repair, restoration and reinstatement of their historic character and architectural interest.

Chief Executive's Recommendation

No change. It is recommended that the structure is added to the RPS with the description provided in the public notices.

RPS No. 8814: 13 Capel Street, Dublin 1

One submission received

- Downey Chartered Planners on behalf of Copa Copa Property Holdings Ltd. (DCC-C38-DRAFT-1841)

Summary of Submission and Responses

Summaries of the issues raised in the submission and the responses to those issues are provided below:

Issue No. 1

The submission indicates that the building has been subject to significant renovation works with the ground floor shop unit in particular having been significantly modified. The structure is located within the Capel Street Architectural Conservation Area and the applicant believes this gives adequate protection to the external elevation of the building.

Response

While the applicant indicates that the building has been subject to significant renovation works, the photographs supplied are limited to a single photograph of the exterior of the front elevation and the interior of the ground floor shop unit. It is also noted that the protection afforded by the inclusion of the structure in the Capel Street ACA is limited to the exterior envelope and does not provide protection to surviving elements of the building's interior.

Buildings which have undergone changes over time can still retain elements of the original plan form and structural timbers. While it is acknowledged that No.13 has been modified over time, the surviving large chimneystack, unusual roof form and façade proportions suggest an early house. Later works are likely to conceal surviving earlier fabric such as early handmade brick, lime plasters and puggins with embedded ancient timbers in floors, walls, windows and roofs. No. 13 Capel Street is identified as an Early Building, appearing on John Roque's map of 1756, and in Dublin Civic Trust's *Survey of Gable-fronted Houses & Other Early Buildings of Dublin* (2012).

The Conservation Section inspected the interior of the structure on 11th April 2022. A number of features were identified, denoting an early date for the building.

- The planform of the structure survives largely intact, though with some insertions at second and third floor level to provide bathrooms and storage. This plan comprises a full-width two-bay room to the front and a stair hall and narrower room to the rear at each level.
- Floors appear to be timber throughout, indicating the survival of a historic floor structure.
- At ground floor level, in the entrance hall to the upper floors, plaster cornicing and a possible bressummer beam were noted.
- The dogleg staircase has a ramped hardwood handrail and shallow threads, though the balustrade is now solid with no balusters or newels visible. However, it is possible that some balusters might survive within the current panelling. At landing and half-landing

levels, paired carved pendant drops can be seen, indicating paired newel posts originally; a single pendant drop was noted to the third floor.

- A corner chimneybreast survives to the front rooms to all upper floors, correlating to the large chimneystack to the party wall with No.14. The rear rooms contain square-profile chimneybreasts to the rear walls, flanked by windows. These correlate to the chimneystack rising out of the centre of the rear elevation.
- Cornicing survives to the front room at first floor level; this has been heavily overpainted though some embellishment can be seen beneath the paint.
- Coved ceilings to the rooms at third floor level are raked to follow the line of the roof in their respective locations.
- There is no surviving historic joinery to windows and doors internally; the window reveals to the front room at first floor level are splayed with straight reveals to all other windows.

Features identified during the internal inspection, and outlined above, clearly indicate an early date for No.13 Capel Street. This probable early date makes it a significant addition to the street's historic building stock as well as an example of a rare and declining building type in the city. Structures such as this are considered to be of great importance in contributing to the understanding of the pre-Georgian city and contributing to the overall knowledge of this building period in Ireland. Capel Street is understood as the principal commercial street of the prosperous eighteenth century Dublin port. The construction of a prestigious thoroughfare of merchant townhouses in close proximity to the historic Customs House and the City Hall suggests the social prominence of the original property owners/developers and their relationship to trade and shipping.

Issue No. 2

The applicant indicates that the structure has no 'special architectural or other features' that would warrant its inclusion in the Record of Protected Structures. The applicant believes the building has no particular architectural, historic, archaeological, technical or other importance.

Response

The National Inventory of Architectural Heritage (NIAH) assessed the building and assigned the building a Regional rating. The NIAH was established to provide both expert and independent data to planning authorities on buildings of value. Dublin City Council received a Ministerial Recommendation for addition of the entire building on the 04th June 2014. The NIAH has assigned the building the special category of 'Architectural' interest.

The Conservation Section, following an external inspection of the site on 21st November 2021, considered the opinion of the NIAH agreed with the Regional rating and category of special interest assigned. An internal inspection on foot of the submission made by the building's owner has revealed the survival of features and fabric of significance, signifying an early construction date for the building. This reinforces the assigning of a Regional rating to the building and demonstrates that it is of architectural significance. Furthermore, the building's contribution to our understanding of eighteenth century Dublin adds historical significance to the structure.

Issue No. 3

The owner intends carrying out improvement works and believes the economic viability of the building will be affected if it is added to the Record of Protected Structures.

Response

The proposed addition of the structure to the RPS does not preclude the carrying out of reasonable works and development that respect the architectural character and special interest of the building. RPS designation is not intended to prohibit development, but to manage material alterations and adaptation through the planning process in accordance with the requirements of the Planning and Development Act, 2000 (as amended) and the Architectural Heritage Protection Guidelines for Planning Authorities (2011).

Section 57 of the Planning and Development Act 2000 (as amended) enables the owner or occupier of a Protected Structure to make a written request to the planning authority for a declaration which, would provide more precise details of the nature and extent of protection (subject to inspection of the premises), and set out those works which would or would not be exempted development in the opinion of the planning authority.

Dublin City Council administers a number of grant funding schemes on behalf of the Department of Housing, Local Government and Heritage which provide financial support to owners and occupiers of protected structures in the repair, restoration and reinstatement of their historic character and architectural interest.

Chief Executive's Recommendation

No change. It is recommended that the structure is added to the RPS with the description as originally provided in the public notices.

RPS No. 8820: 138 Capel Street, Dublin 1

One submission Received

- DCC-C38-Draft-1885

Summary of Submission and Response

Summaries of the issues raised in the submission and the responses to those issues are provided below:

Issues

The submission outlines the following reasons not to add to RPS:

- No attributes of any cultural, artistic or historical merit.
- Company purchased building 20 years ago and it had no features of interest at that time. No fireplaces, staircases, architraves, doors, windows or ceilings.
- Building had internal and external renovation in the circa 1990s.

Response

The National Inventory of Architectural Heritage (NIAH) assessed the building on the 2nd September 2014 as part of its survey of Dublin City and assigned the building a 'Regional' rating. The NIAH was established in 1999 as a statutory body on behalf of the Minister (currently) for Housing, Local Government & Heritage. Its survey of the city is being undertaken in a number of phases, which are sequentially published by the Department (DHLGH), to assist Dublin City Council in the maintenance of a comprehensive Record of Protected Structures (RPS).

Section 51 of the Planning and Development Act, 2000 (as amended) requires that every Development Plan shall include a record of protected structures, and shall include in that record every structure which is, in the opinion of the planning authority, of such (special architectural, historical, archaeological, artistic, cultural, scientific, social or technical) interest within its functional area.

On the 9th August 2017, Dublin City Council received a Ministerial Recommendation, issued under Section 53 of the Act, for the addition of the building at 138 Capel Street, Dublin 1, to its RPS. The NIAH assigned the building a category of special 'Architectural' interest, in accordance with Section 51 of the Act; noting that '*The building contributes to the historic built form of Capel Street ACA, one of Dublin's oldest commercial areas*'.

Under Section 53(2) of the Act, Dublin City Council shall have regard to any recommendation made by the Minister regarding the inclusion in its record of particular structures or parts of structures or specific features within the grounds of structures, in its RPS.

The Conservation Section, following an external inspection of the site on 9th November 2021, considered the Ministerial Recommendation and the NIAH record and concurs with the category of special interest assigned to 138 Capel Street.

Buildings which have been adapted over time can often retain elements of the original fabric, plan form (layout) and structural elements, including timbers. While it is acknowledged that 138 Capel Street has been modified over time, the surviving large chimneystack, the unusual roof form, its relatively large plot width, and its façade proportions, all indicate an 'early house', dating from the early 18th century, and which was most likely gable-fronted. Notwithstanding interventions over time, the building quite probably still retains important, original structural elements, such as large support beams (bressumer beams) and early roof timbers.

Construction features of interest have been identified on the exterior of this building, in particular the massive chimneystack and rare roof form. The roof form demonstrates the use of Palladian design and practice in early 18th century Dublin. Later works may conceal surviving earlier fabric such as the handmade brick, lime plasters and puggins with embedded, ancient timbers in floors, walls, windows and roofs and the massive chimney breasts and stacks that stabilised the structure.

Recent research by Dublin Civic Trust and others has revealed that more 'early buildings' (dating from the mid-17th to the early 18th century) survive in Dublin city than was previously thought, often hidden behind later facades. A number of former houses on Thomas Street and Aungier Street with these characteristics have been subject to Dendrochronology (tree-ring dating). These include Nos. 9/9a Aungier Street (dated to 1664); No. 130 Thomas Street (dated to 1639) and Nos. 61/62 Thomas Street (dated to 1620's).

The probable 'early' origin of No. 138 Capel Street makes it a significant addition to the street's historic building stock, as well as a rare and declining building typology in the city. These structures are of great importance to our understanding of the pre-Georgian period in both Dublin and Ireland.

Capel Street was one of the principal commercial streets of the prosperous 18th century port city of Dublin. The development of a prestigious thoroughfare of merchant townhouses in close proximity to the Custom House and City Hall, illustrates social prominence of the property owners/developers and their relationship to trade and shipping. Examples of very fine craftsmanship and decorative plasterwork have been found in Capel Street buildings dating from this period.

Section 57 of the Planning and Development Act 2000 (as amended) enables the owner or occupier of a Protected Structure to make a written request to the planning authority for a declaration which, would provide more precise details of the nature and extent of protection (subject to inspection of the premises), and set out those works which would or would not be exempted development in the opinion of the planning authority.

Dublin City Council administers a number of grant funding schemes on behalf of the Department of Housing, Local Government and Heritage which provide financial support to owners and occupiers of protected structures in the repair, restoration and reinstatement of their historic character and architectural interest.

Chief Executive's Recommendation

No change. It is recommended that the structure be added to the RPS with the description provided in the public notices.

RPS No. 8823: Chapelizod Weir, Chapelizod, Dublin 20

One submission received:

- RF Property Management on behalf of the owners' management company for The Island and The Weir apartment developments DCC-C38-DRAFT-315.

Summary of Submission and Response

Summary

Owners' Management Company (OMC) is responsible for managing the common areas of the Island and The Weir apartment developments in close proximity to Chapelizod Weir. The OMC supports the addition of the Weir to the RPS. The Board considers the weir to be a valuable part of the village's heritage. It is a notable reminder to residents of the village's industrial heritage. The OMC notes the penstock and cogged iron wheels in particular warrant attention and care and hopes the protection will ensure that its condition does not deteriorate further.

Response

Noted.

Chief Executive's Recommendation

No change. It is recommended that the structure is added to the RPS with the description provided in the public notices.

RPS No. 8830: Former Central Bank (now known as Central Plaza), Dame Street, Dublin 2

One submission received:

- Hines Real Estate Ireland Limited on behalf of property owner (Dame Plaza Property Trading DAC) (Ref. DCC-C38-DRAFT-693)

Summary of Submission and Responses

Summaries of the issues raised in the submission and the responses to those issues are provided below:

Issue No. 1

The submission states that it 'understands the rationale for the designation of the exterior only of the former Central Bank office building, the main exterior elements of which have remained as originally constructed'.

Response

Support for the addition of the former Central Bank Office Tower/Building is noted. For the purpose of clarity, the proposed protection is not limited to 'exterior only' but also includes the 'structural core and floor plates'; - the proposed RPS description reads: 'Former Central Bank (exterior) to include structural core and floor plates (now known as Central Plaza); restaurant annexe (exterior only); Public Plaza and Crann an Óir sculpture'.

Issue No. 2

The submission requests exclusion of the restaurant annexe, public plaza and Crann an Óir sculpture from the RPS entry and suggests a revised proposed description to read 'Former Central Bank (exterior) to include structural core and floor plates (now known as Central Plaza)'. The submission cites the extent of change now implemented to both the restaurant annexe and the public plaza as reasons for their exclusion from the RPS entry referring to planning file ref: 3154/17 and ref: 3907/19; and ref: 3620/17 and ABP ref: ABP-300063-17, respectively. A concise list of the principal interventions to the annexe and plaza, granted under planning permission, have been provided supported by recent site photographs. Having particular regard to the restaurant annexe, the submission references an extract from an Architectural Heritage Report prepared by David Slattery, Conservation Architects. This concludes that the annexe building 'cannot be considered to be of architectural significance'. The submission further queries whether protection would extend to the glazed stair core and other recent interventions.

Response

The Conservation Section have considered relevant planning permissions granted for the subject property, including Reg. Refs. 3154/17, 3907/19 and 3620/17 (ABP-300063-17), in its assessment of the structures. The annexe was designed as an ancillary structure providing restaurant and staff support facilities to the principal office tower and forms an integral component of the wider ensemble. It is noted that the Architectural Heritage Report prepared by David Slattery, Conservation Architects and referenced in the submission, identifies the bridge and parapet to the annexe as 'strong horizontal concrete bands', being

'items of interest'. It is noted that the proposed addition as described refer to the exterior only of the former restaurant annexe. These elements are retained in the development as permitted.

The public plaza is a fundamental design feature of Gibney's original scheme, conceived by the innovative suspended construction of the office building overhead. This enabled the creation of a generous public space at ground level by minimising the footprint of the building, while also providing some cover by means of the suspended floors overhead. The suspended structure liberates the plaza below at ground level, allowing unobstructed views over the surrounding streets. This design inter-relationship between building and plaza is largely retained in the permitted development and remains a significant spatial and architectural feature of the ensemble and its setting.

The Crann an Óir sculpture by Éamonn O 'Doherty, commissioned by the Central Bank of Ireland to mark Dublin's year as European City of Culture in 1991 is an important site-specific art installation, considered so integral to the site/complex that the Central Bank of Ireland decided that it should remain at the Dame Street site despite their relocation to new premises on North Wall Quay.

The Conservation Section acknowledge the current adaptation and modernisation of the former buildings and the plaza. Notwithstanding these works, it is considered that the restaurant annexe (exterior only), the public plaza and Crann an Óir sculpture contribute to the special interest and significance of the former Central Bank principal building and its setting and should be directly referred to in the description of the proposed protected structure; as described in the public notice. This will ensure that material alterations and works to these key features within the curtilage of the principal protected structure are managed through the planning process in accordance with the provisions of the Planning and Development Act, 2000 (as amended) and the Architectural Heritage Protection Guidelines for Planning Authorities (2011).

Section 57 of the Planning and Development Act 2000 (as amended) enables the owner or occupier of a Protected Structure to make a written request to the planning authority for a declaration which, would provide more precise details of the nature and extent of protection (subject to inspection of the structures), and set out those works which would or would not be exempted development in the opinion of the planning authority.

Chief Executive's Recommendation

No change. It is recommended that the structure is added to the RPS with the description as originally provided in the public notices.

RPS Nos. 8831, 8832, 8833 and 8834: Echlin Buildings, Blocks A to D inclusive, Echlin Street, Dublin 8

Submissions received from:

- Damien Ryan (building resident) (Ref. DCC-C38-DRAFT-1084, DCC-C38-DRAFT-1085, DCC-C38-DRAFT-1086 & DCC-C38-DRAFT-1087)
- Stephen Hollan (building resident) (Ref. DCC-C38-DRAFT-1149)
- Adrian Martin (building resident) (Ref. DCC-C38-DRAFT-1167)
- Colm Tobin (building resident) (Ref. DCC-C38-DRAFT-1583)
- Piere Waland (building resident) (Ref. DCC-C38-DRAFT-2130)

Summary of Submissions and Responses

The submissions include similar observations and have been addressed collectively. It is noted that Submissions DCC-C38-DRAFT-1084, 1085, 1086 & 1087 are duplicate submissions from the same author. Summaries of the issues raised in the submissions and the responses to those issues are provided below:

Issue No. 1

Three submissions object to the proposed addition of the buildings where this would impose additional financial restrictions on repair and maintenance and where this would exclude owners/occupiers from availing of grant aided thermal upgrading. Two submissions argue that the addition of the buildings will lead to dilapidation and abandonment of the structure due to alleged dwindling re-sale value and unaffordable upkeep costs.

Response

Section 51 of the Planning and Development Act, 2000 (as amended) requires that every Development Plan shall include a Record of Protected Structures, and shall include in that record every structure which is, in the opinion of the planning authority, of such (special architectural, historical, archaeological, artistic, cultural, scientific, social or technical) interest within its functional area.

On the 28th June 2018, Dublin City Council received Ministerial Recommendations, issued under Section 53 of the Act, for the addition of the buildings at Blocks A to D (inclusive), Echlin Street, Dublin 8, to its RPS. The NIAH assigned the buildings a category of special 'Architectural, Historical and Social' interest, in accordance with Section 51 of the Act.

Under Section 53(2) of the Act, Dublin City Council shall have regard to any recommendation made by the Minister regarding the inclusion in its record of particular structures or parts of structures or specific features within the grounds of structures, in its RPS.

Section 57 of the Planning and Development Act 2000 (as amended) enables the owner or occupier of a Protected Structure to make a written request to the planning authority for a declaration which, would provide more precise details of the nature and extent of protection (subject to inspection of the structures), and set out those works which would or would not be exempted development in the opinion of the planning authority.

Dublin City Council administers a number of grant funding schemes on behalf of the Department of Housing, Local Government and Heritage which provide financial support to owners and occupiers of protected structures in the repair, restoration and reinstatement of their historic character and architectural interest.

It is noted that a range of works to increase the thermal performance and energy efficiency of a Protected Structure, in line with the relevant Advice Series guidance, have been outlined as qualifying works under the current, national grant funding scheme; the Built Heritage Investment Scheme (BHIS) 2022.

Issue No. 2

One submission enquires whether there is a precedent for the addition of similar privately owned multi-occupancy apartment complexes to the RPS.

Response

Dublin City Council's RPS features a number of similar multi-occupancy apartment complexes, such as the former Guinness Trust Flats at Thomas Court, Dublin 8 (RPS Ref: 7143-8144); also in private ownership.

Issue No. 3

Four submissions support the addition of the exterior of the buildings to the RPS, but object to the addition of the individual apartment units citing that significant refurbishment of the structure was undertaken in 1988, described as 'insensitive' by Dr. Christine Casey, (The Buildings of Ireland pg.664). The submissions indicate that the buildings retain few original internal features of interest save for the communal granite staircases to each block.

Response

An inspection of Block B of the Echlin Buildings was carried out by Dublin City Council's Conservation Section on the 01/04/2022 to include the communal stairwell and the interior of one of the apartment units. The inspection, along with a review of some online property sales brochures which include recent images of a number of residential units from across the four apartment blocks, illustrates generally that the interiors of the apartment units are of limited architectural, historical or social interest and, therefore, should not be included as part of the proposed additions to the RPS. However, the communal stairwell to each of the four blocks (A to D inclusive) retain the cantilevered open-string granite staircase, with a modest yet elegant wrought-iron handrail. These are considered to be of architectural interest and merit inclusion in an amended description proposed for the RPS entries, as recommended below.

Chief Executive's Recommendation

Amendment:

It is recommended that the descriptions as originally provided in the public notices be amended as follows:

Proposed Description in Draft Development Plan

| RPS Ref No | Address | Description |
|-------------------|-------------------------|---|
| 8831 | Echlin Street, Dublin 8 | The Echlin Buildings – Block A <u>{{(exterior and communal stairwell with granite cantilevered staircase.)}}</u> |
| 8832 | Echlin Street, Dublin 8 | The Echlin Buildings – Block B <u>{{(exterior and communal stairwell with granite cantilevered staircase.)}}</u> |
| 8833 | Echlin Street, Dublin 8 | The Echlin Buildings – Block C <u>{{(exterior and communal stairwell with granite cantilevered staircase.)}}</u> |
| 8834 | Echlin Street, Dublin 8 | The Echlin Buildings – Block D <u>{{(exterior and communal stairwell with granite cantilevered staircase.)}}</u> |

RPS No. 8849: 4a Henrietta Lane, Dublin 1

Six submissions received:

- Nessa Hourigan - DCC-C38-DRAFT-1461
- Valerie Driscoll - DCC-C38-DRAFT-1678
- Alex Driscoll - DCC-C38-DRAFT-1685
- Tilly Driscoll Smith - DCC-C38-DRAFT-1699
- Frank Ryan - DCC-C38-DRAFT-2141
- Sean McCormack - DCC-C38-DRAFT-2142

Summary of Submissions and Responses

The submissions received include similar observations on the proposed addition of the structure at No. 4a Henrietta Lane to the Record of Protected Structures, together with a commentary on the proposed addition prepared for the owner of No. 4a Henrietta Lane by Mesh Architects. Summaries of the issues raised in the submissions and the responses to those issues are provided below:

Issue No. 1:

The report proposing addition to the RPS claims that the frontage of No. 4a Henrietta Lane is original 18th century. Evidence is provided comparing Rocque's of 1756 with the Ordnance Survey map of 1847 which shows that Henrietta Lane has been extensively widened. The conservation report (Mesh Architects) included with the submissions indicates that while the north wall is heavily modified there is evidence of brick and stone (including stone rubble) to the wall. The submissions also states that the Valuation Office records indicate that there was significant rebuilding, most recently in 1932 and that there were new structures added to the site in 1938. The Valuations Office records indicated that the northern boundary wall to Henrietta Lane was constructed of 'brick and rubble masonry' rather than 'stone and brick' as noted in the DCC addition report (DCC-C38-DRAFT-1678, DCC-C38-DRAFT-1685, DCC-C38-DRAFT-2141, DCC-C38-DRAFT-2142).

Response

The inspection undertaken by the Conservation Section indicates that there is historic material present at No. 4a Henrietta Lane (Eircode D01 VE86). It is acknowledged that the northern boundary wall may be associated with the nineteenth century widening of Henrietta Lane, rather than the eighteenth century. The Valuation Office records do not explicitly indicate whether the structures on site were completely or only partially rebuilt in the twentieth century. Rubble masonry is considered a form of stone construction. In recognition of the layered history of the site is recommended that the RPS description for the entry is amended from '18th century stone and brick boundary walls to include surviving opening to laneway' to 'historic stone and brick boundary walls'.

Issue No. 2

The original boundary wall between No. 3 and No. 4a Henrietta Lane was dramatically altered to facilitate the widening of the corner of Henrietta Lane by the mid-nineteenth century with the north end of the wall having been demolished (DCC-C38-DRAFT-167, DCC-C38-DRAFT-1685, DCC-C38-DRAFT-2141, DCC-C38-DRAFT-2142).

Response

While the north end of the wall may have been modified with the widening of Henrietta Lane, the majority of the wall that now forms the shared boundary between No. 3 Henrietta Street and No. 4a Henrietta Lane is extant. The wall is considered to be historical in nature, as shown in the photographs taken during the inspection by the Conservation Section and those included in submissions.

Issue No. 3

This boundary wall is already protected by its inclusion within the curtilage of No. 3 Henrietta Street which is included in the current RPS (RPS no. 3650). There are four owners of this boundary wall. Despite alterations to the boundary wall there are many efforts underway to protect what is left of the wall (DCC-C38-DRAFT-1461, DCC-C38-DRAFT-1678, DCC-C38-DRAFT-1685).

Response

The proposed addition of the boundary walls to 4a Henrietta Lane, including the boundary wall between No. 3 Henrietta Street (Eircode D01 PW74) and No. 4a Henrietta Place (D01 VE86), is being undertaken to ensure that those structures or parts of structures of special interest within plots of land on Henrietta Lane are included on the RPS. As noted in the submissions, there is a complex ownership pattern and arrangement/distribution of structures to the rear of No. 4 Henrietta Street with No. 4a (aka No. 4) Henrietta Lane and No. 4b Henrietta Place, and between No. 3 Henrietta Street and the abutting No. 4a Henrietta Place and 4 Henrietta Street, Dublin 1.

The purpose of the proposed addition is to ensure that the historic features (structures or parts of structures) considered to be of special interest within the property 4a Henrietta Lane are provided with appropriate architectural heritage protection by the planning authority in accordance with Section 51 of the Planning and Development Act, 2000 (as amended).

Issue No. 4

The DCC addition report acknowledges that the NIAH did not carry out an inspection of No. 4a (or No. 4b) Henrietta Lane and that there are inaccuracies in the NIAH record. The assigning of a regional rating to No. 4a on the basis of the NIAH record for No. 4 Henrietta Street reflects these inaccuracies (DCC-C38-DRAFT-1461, DCC-C38-DRAFT-1678, DCC-C38-DRAFT-1685).

Response

The report by the Conservation Section on the proposed addition states that the 'Regional' rating is assigned by that Section based on the criteria used by the NIAH. That report acknowledges the limitations of the NIAH survey and notes that it did not include Henrietta Lane. Using the NIAH criteria the Conservation Section consider the structures to be of Architectural and Historical special interest, as stated in the report.

Issue No. 5

No reason for the proposed addition is provided by DCC. The report only includes that it is deemed as being of Regional significance in Stage 1 of the NIAH. This relates to No. 4 Henrietta Street which is not the building in question. Also it was included in a list of prioritised structures for addition to the RPS though no reason is given. No explanation is given as to why the remaining walls are given a regional rating or why the structure 'makes a significant contribution to the architectural heritage within their region or area' (DCC-C38-DRAFT-1678, DCC-C38-DRAFT-1685).

Response

Section 51 of the Act requires that every Development Plan shall include a Record of Protected Structures, and shall include in that record every structure which is, in the opinion of the planning authority, of such (special architectural, historical, archaeological, artistic, cultural, scientific, social or technical) interest within its functional area. It is noted that it is the opinion of the planning authority, underlined for emphasis above, that is key here.

The assessment by the Conservation Section of the planning authority provides justification for the 'Regional rating and the proposed addition to the RPS, given that said structures include surviving elements of the historic ancillary structures and boundary walls associated with the principal townhouse (now in separate ownership) at 4 Henrietta Street; a protected structure.

Issue No. 6

The only reason given for the protection of this structure is that they are surviving architectural features from the 18th century but the plot has been divided since 1926 and none of the original buildings survive in what was an open yard till c. 1938. The boundary wall with No. 3 Henrietta Lane was constructed as part of the mews buildings for that building, not No. 4 Henrietta Street (DCC-C38-DRAFT-1678).

Response

It is not uncommon for ancillary structures to the rear of historic properties to be reconfigured and altered over time. It is acknowledged that while the wall to the west side of the property would have originally comprised structures serving No. 3 Henrietta Street, it now acts as the boundary between the properties. The surviving walls on the site comprise various historic fabric from the 18th to 20th centuries.

Issue No. 7

DCC have not carried out an appropriate assessment of the property leading to inaccuracies (DCC-C38-DRAFT-1678).

Response

The Conservation Section carried out an internal and external inspection of the site and premises on the 22nd February 2020; details are provided along with the written assessment in the report on the proposed addition of 4a Henrietta Place to the RPS.

Issue No. 8

It is claimed that the proposed addition to the RPS uses the NIAH assessment criteria however 11 of the 15 criteria were not addressed (DCC-C38-DRAFT-1678).

Response

The 15 NIAH criteria referred to in the submission are not the categories used to identify the special interest of a building, but those used in the preparation of the summary description by the National Inventory of Architectural Heritage. The categories of special interest are out in Section 51 of the Planning and Development Act 2000 (as amended) as 'architectural, historical, archaeological, artistic, cultural, scientific, technical and social'. These categories are not mutually exclusive and a structure may be attributed a number of special interest categories. Conversely, a structure will not necessarily warrant all categories of special interest being assigned to it. No. 4a Henrietta Lane is considered to be of special 'Architectural' and 'Historical' interest by the Conservation Section, in accordance with Section 51 of the Act and Chapter 2: The Development Plan – Record of Protected Structures of the Architectural Heritage Protection Guidelines for Planning Authorities (2011).

Issue No. 9

Some of the houses along Henrietta Street and Henrietta Lane have actual examples of surviving original structures. These houses have always been under one ownership. Why are the ones that are in separate ownership being proposed for addition? (DCC-C38-DRAFT-1678, DCC-C38-DRAFT-1685, DCC-C38-DRAFT-1461)

Response

Where a building on Henrietta Street and its associated rear site to Henrietta Lane are in the same ownership the protection 'includes the structure, its interior and the land within its curtilage and other structures within that curtilage....' (Architectural Heritage Protection, Guidelines for Planning Authorities, 2011). However, as noted in the submissions No. 4 Henrietta Street and No. 4a Henrietta Lane are now in separate ownerships, with the structures in No. 4a Henrietta Lane no longer being within the legal curtilage of the original, historic townhouse at 4 Henrietta Street. The purpose of the proposed addition is to ensure that the historic features (structures or parts of structures) considered to be of special interest within 4a Henrietta Lane are provided with appropriate architectural heritage protection by the planning authority in accordance with Section 51 of the Act.

Issue No. 10

The buildings at 4a (and 4b) Henrietta Lane are located further down the cul-de-sac and cannot be seen from Henrietta Street at all. They have no impact on Henrietta Street itself (DCC-C38-DRAFT-1678).

Response

Noted. Section 51 of the Act requires that every Development Plan shall include a Record of Protected Structures, and shall include in that record every structure which is, in the opinion of the planning authority, of such (special architectural, historical, archaeological, artistic, cultural, scientific, social or technical) interest within its functional area.

The purpose of the proposed addition is to ensure that the historic features (structures or parts of structures) considered to be of special interest within 4a Henrietta Lane are provided with appropriate architectural heritage protection by the planning authority in accordance with Section 51 of the Act.

Issue No. 11

Henrietta Lane is derelict and neglected and is in need of sensitive redevelopment and investment. Barriers to conservation-minded development such as addition to the RPS will delay if not halt respectful development and investment, leaving the buildings along the lane vulnerable to further dilapidation and neglect (DCC-C38-DRAFT-1678, DCC-C38-DRAFT-2142).

Response

The addition of the structure to the RPS does not preclude the undertaking of development and/or works to the property or the protected structure. Positive adaptation, reuse, development, material alterations and other works to protected structures are managed through the planning process in accordance with the provisions of the Planning and Development Act. 2000 (as amended) and the Architectural Heritage Protection Guidelines for Planning Authorities (2011).

Section 57 of the Planning and Development Act 2000 (as amended) enables the owner or occupier of a Protected Structure to make a written request to the planning authority for a declaration which, would provide more precise details of the nature and extent of protection (subject to inspection of the structures), and set out those works which would or would not be exempted development in the opinion of the planning authority.

Dublin City Council administers a number of grant funding schemes on behalf of the Department of Housing, Local Government and Heritage which provide financial support to owners and occupiers of protected structures in the repair, restoration and reinstatement of their historic character and architectural interest.

Chief Executive's Recommendation

Amendment: It is recommended that the RPS description for the entry is amended as below:

Proposed Description in the Draft Development Plan:

| Recommendation | | |
|-----------------------|--------------------------------|---|
| RPS No. | Address | Description (to appear on RPS) |
| 8849 | 4a Henrietta Lane, Dublin 1 | (18th-century stone and brick boundary walls to include surviving opening to laneway) <u>{Historic stone and brick boundary walls within No. 4a (only).}</u> |

RPS No. 8850: 4b Henrietta Lane, Dublin 1

Three submissions received:

- Valerie Driscoll - DCC-C38-DRAFT-896
- Frank Ryan - DCC-C38-DRAFT-2140
- Sean McCormack - DCC-C38-DRAFT-2143

Summary of Submissions and Responses

The submissions received include similar observations on the proposed addition of the structure at No. 4b Henrietta Lane to the Record of Protected Structures. Summaries of the issues raised in the submissions and the responses to those issues are provided below:

Issue No. 1

The north wall to Henrietta Lane is clearly not an 18th century structure as noted in the addition report, but is a poorly constructed wall of 20th century constructed of random rubble which can be seen from where the render has detached. There is modern brick in the wall and it is very different in appearance to No. 6 Henrietta Lane which is 18th century in date.

The boundary wall with 5 Henrietta Lane is also of no architectural significance and should not be included on the RPS.

The Valuation Office records indicate that the structures were in a dilapidated state in 1919 and no longer worthy of valuation. In 1927 “three new walls to yard” is shown in the records and in 1932 ‘a heap of ruins’. By 1938 a new roof and walls had been added after the rear of 4 Henrietta Street was sold to the Model Creamery Co. (DCC-C38-DRAFT-896, DCC-C38-DRAFT-2140, DCC-C38-DRAFT-2143)

Response

The inspection undertaken by the Conservation Section of DCC indicated that there is historic material present to No. 4b Henrietta Lane, Dublin 1 (Eircode D01 Y897). It is acknowledged that the northern boundary wall may be associated with the nineteenth century widening of Henrietta Lane, rather than the eighteenth century.

The Valuation Office records do not explicitly indicate whether the structures on site were completely or only partially rebuilt in the twentieth century.

Rubble masonry is considered a form of stone construction. In recognition of the layered history of the site is recommended that the RPS description for the entry is amended from ‘18th century stone and brick boundary walls to include masonry vaults and surviving opening to laneway’ to ‘historic stone and brick boundary walls to include masonry vaults’.

Issue No. 2

There is only one original element of this property that survives is the vaulted area to the rear of 4b Henrietta Lane on the ground floor. The vaulted area provides structural support for the 18th century raised garden of 4 Henrietta Street and is therefore already protected as part of the RPS record for this structure. The buildings at 4a and 4b Henrietta Lane have

been under separate ownerships from 4 Henrietta Street since 1926 (DCC-C38-DRAFT-896, DCC-C38-DRAFT-2140, DCC-C38-DRAFT-2143).

Response

Noted. The proposed addition of 4b Henrietta Lane is being undertaken to ensure those structures or parts of structures of special interest within plots of land on Henrietta Lane are included in the RPS. As noted in the submissions, there is a complex ownership pattern and arrangement/distribution of structures to the rear of No. 4 Henrietta Street with No. 4a (aka No. 4) Henrietta Lane and No. 4b Henrietta Place.

The purpose of the proposed addition is to ensure that the historic features (structures or parts of structures) considered to be of special interest within the property 4b Henrietta Lane are provided with appropriate architectural heritage protection by the planning authority in accordance with Section 51 of the Planning and Development Act, 2000 (as amended).

Issue No. 3

Clarification of the description of materials between the Valuation Office records 'brick and rubble masonry' and the DCC record of the building 'stone and brick' (DCC-C38-DRAFT-896).

Response

Noted. Rubble masonry is a form of stone construction.

Issue No. 4

The DCC addition report does not explain why a 20th century rubble and brick wall and façade frontage to Henrietta Lane would have a regional rating warranting inclusion in the RPS (DCC-C38-DRAFT-896).

Response

Section 51 of the Act requires that every Development Plan shall include a record of protected structures, and shall include in that record every structure which is, in the opinion of the planning authority, of such (special architectural, historical, archaeological, artistic, cultural, scientific, social or technical) interest within its functional area.

The assessment by the Conservation Section of the planning authority provides justification for the 'Regional rating and the proposed addition to the RPS, given that said structures include surviving elements of the historic ancillary structures and boundary walls associated with the principal townhouse (now in separate ownership) at 4 Henrietta Street; a protected structure.

Issue No. 5

The report does not note that the structure is located down a laneway, around the corner and cannot be seen and does not impact on the character of Henrietta Street (DCC-C38-DRAFT-896).

Response

Noted. Section 51 of the Act requires that every Development Plan shall include a Record of Protected Structures, and shall include in that record every structure which is, in the opinion of the planning authority, of such (special architectural, historical, archaeological, artistic, cultural, scientific, social or technical) interest within its functional area.

The purpose of the proposed addition is to ensure that the historic features (structures or parts of structures) considered to be of special interest within 4b Henrietta Lane are provided with appropriate architectural heritage protection by the planning authority in accordance with Section 51 of the Act.

Issue No. 6

The report does not include that the structures are among a line of derelict buildings and that any inclusion of the structures in the RPS may impact the development of the site and may impact the previously granted permission at No. 3 Henrietta Lane (DCC-C38-DRAFT-896, DCC-C38-DRAFT-2143).

Response

The addition of the structure to the RPS does not preclude the undertaking of development and/or works to the property or the protected structure. Positive adaptation, reuse, development, material alterations and other works to protected structures are managed through the planning process in accordance with the provisions of the Planning and Development Act, 2000 (as amended) and the Architectural Heritage Protection Guidelines for Planning Authorities (2011).

Section 57 of the Planning and Development Act 2000 (as amended) enables the owner or occupier of a Protected Structure to make a written request to the planning authority for a declaration which, would provide more precise details of the nature and extent of protection (subject to inspection of the structures), and set out those works which would or would not be exempted development in the opinion of the planning authority.

Dublin City Council administers a number of grant funding schemes on behalf of the Department of Housing, Local Government and Heritage which provide financial support to owners and occupiers of protected structures in the repair, restoration and reinstatement of their historic character and architectural interest.

Issue No. 7

The proposal to include No. 4b Henrietta Lane in the RPS did not follow the correct process for RPS addition and should, therefore, be halted (DCC-C38-DRAFT-2143).

Response

The statutory process provided under Section 12(3) of the Planning and Development Act, 2000 (as amended) was adhered to for the proposed addition of the subject property. Legal searches were undertaken by the Law Department to identify the address of the property owner(s) and occupier(s). Statutory notification was issued accordingly, including letters by both standard and registered mail, and the fixing of the notification to the front of the property on Henrietta Lane.

Issue No. 8

The photograph provided by DCC includes part of the rear boundary of 5 Henrietta Lane. Applicant includes a photograph showing the actual extent of the rear elevation (DCC-C38-DRAFT-2143).

Response

Noted. The photograph included in the Conservation Section report on the proposed addition is for illustrative purposes and does not constitute the extent of protection recommended. The proposed protection does not extend beyond the property boundary of No. 4b Henrietta Lane.

Issue No. 9

The proposal to add the building is based on the NIAH record for 4 Henrietta Street and the NIAH did not survey 4b Henrietta Lane as part of the assessment (DCC-C38-DRAFT-2143).

Response

The report by the Conservation Section on the proposed addition states that the 'Regional' rating is assigned by that Section based on the criteria used by the NIAH. That report acknowledges the limitations of the NIAH survey and notes that it did not include Henrietta Lane. Using the NIAH criteria the Conservation Section consider the structures to be of Architectural and Historical special interest, as stated in the report.

Issue No. 10

A proper site inspection was not carried out by DCC (DCC-C38-DRAFT-2143).

Response

The Conservation Section carried out an internal and external inspection of the property on the 22nd February 2020.

Chief Executive's Recommendation

Amendment: it is recommended that the RPS description for the entry is amended as below:

Proposed Description in the Draft Development Plan

| Recommendation | | |
|-----------------------|-----------------------------|--|
| RPS no. | Address | Description (to appear on RPS) |
| 8850 | 4b Henrietta Lane, Dublin 1 | (18th-century stone and brick boundary walls to include masonry vaults and surviving opening to laneway) <u>{Historic stone and brick boundary walls within No. 4b (only) including masonry vaults.}</u> |

RPS Nos. 8851, 8853, 8854, 8855, 8856, 8857, 8858, 8859, 8860, 8861, 8862, 8863, 8864, 8865, 8866, 8867 and 8868: Inchicore Railway Works, Inchicore Parade, Dublin 8

Two submissions received:

- CIE Submission (Ref. DCC-C38-DRAFT-1413)
- Irish Rail Submission (Ref. DCC-C38-DRAFT-2114)

Summary of Submissions and Responses

Both submissions provide similar observations on the proposed addition of 17 structures within Inchicore Railway Works to the Record of Protected Structures. Summaries of the issues raised in the submissions and the responses to those issues are provided below:

Issue No. 1

Built in 1846 Inchicore Works are critically important to the operational functioning of the railway with overhaul, repair, servicing, spraying and washing of locomotive and rolling stock all taking place daily on site to support a network wide rail operation. It should be noted that railway operations have changed over the 175 years since Inchicore was first built and will continue to do so. While Inchicore Works came into railway use in the 19th century, it now houses a 21st century railway operation, which will see ongoing operational changes as part of an evolving modern rail industry.

Response

The Chief Executive acknowledges that the continued use of the Inchicore Railway Works as an operational railway facility has been key in ensuring the survival of these structures. It is accepted that no public railway system can be completely authentic in historical terms, as the service and operations demand continuous change and development. Indeed, perhaps it is this necessity to adapt and evolve that contributes to the significance of the surviving historic structures. The continued use of these structures and of the wider works complex as part of the national railway service is an important element of their value to the city's built heritage.

The proposed addition of these structures to the RPS does not preclude the carrying out of appropriate works, modifications, extensions and other development that respect the architectural character and special interest of the buildings. RPS designation is not intended to prohibit development, but to manage material alterations and adaptation through the planning process in accordance with the requirements of the Planning and Development Act, 2000 (as amended) and the Architectural Heritage Protection Guidelines for Planning Authorities (2011).

Section 57 of the Planning and Development Act 2000 (as amended) enables the owner or occupier of a Protected Structure to make a written request to the planning authority for a declaration which, would provide more precise details of the nature and extent of protection of the structures (subject to inspection), and set out those works which would or would not be exempted development in the opinion of the planning authority.

Dublin City Council administers a number of grant funding schemes on behalf of the Department of Housing, Local Government and Heritage which provide financial support to

owners and occupiers of protected structures in the repair, restoration and reinstatement of their historic character and architectural interest.

It is noted that Objective CUO14, Chapter 12: Culture of the Draft Dublin City Development Plan 2022-2028 provides as follows:

Objective CUO14 Museum/Heritage Facility at Inchicore Works

To support CIE in any future proposal to provide a transport museum/heritage facility at Inchicore Works and seek that any new development at or proximate to the Works is sensitive to the industrial heritage of this area.

Issue No. 2

CIE/IE have carried out an initial review of those buildings (see Appendix 1 below) and would comment as follows;

- It is assumed that the footprints only of the buildings are to be included, the majority not having individual curtilage.
- The interior of the majority of the buildings do not have any surviving architectural features or elements. CIE would suggest that unless stated the interior of the buildings would not be included.
- Investment by IE has secured sustainable ongoing use of many of the buildings consistent with their original railway related function. It is important that the addition of any building to the RPS would not hinder or frustrate similar sustainable re-use.
- The Signal Box (RPS 8866) is on the only available line for additional track required for the proposed electrification under Dart+ South West, for which a Railway Order submission to An Bord Pleanála is being prepared. CIE/IE would suggest that it be omitted from the RPS.
- The Former Fire Station (budget to underpin & redevelop in excess of €1million) (RPS 8857) and 3 Bay Office Building (too small in scale to be economically redeveloped) (RPS 8856) are in very poor condition, are of limited architectural merit, and are incapable of economically sustainable re-use. CIE/IE would suggest that they be omitted from the RPS.
- The Water Pump (RPS 8861) is geographically separated from the other buildings proposed for the RPS. CIE/IE would suggest that its inclusion in the RPS would explicitly allow for it to be relocated to a position where its future might better be secured.

Response

Section 57 of the Planning and Development Act 2000 (as amended) enables the owner or occupier of a Protected Structure to make a written request to the planning authority for a declaration which, would provide more precise details of the nature and extent of protection of the structures (subject to inspection), and set out those works which would or would not be exempted development in the opinion of the planning authority.

As already stated above in response to Issue No. 1, the purpose of protection is to manage change to the proposed protected structures through the planning process, ensuring that their architectural character and special interest are respected and retained. Identifying a suitable, viable use for a building is the best way to ensure its protection into the future. The proposed addition of these structures to the City Council's RPS will not preclude

appropriate adaptation and reuse. In addition, specific proposals to relocate certain structures such as the water pump or signal box would be considered on their merits, subject to justification and the requirements of conservation best practice.

Dublin City Council administers a number of grant funding schemes on behalf of the Department of Housing, Local Government and Heritage which provide financial support to owners and occupiers of protected structures in the repair, restoration and reinstatement of their historic character and architectural interest.

Proposals for significant alterations to existing public rail transport infrastructure and the provision of new infrastructure, will be the subject of one or more applications for planning permission, which will be assessed on their merits in the development management process, having regard to the relevant material considerations, including the provisions of the Dublin City Development Plan at that time.

Chief Executive's Recommendation

No change. It is recommended that the structures are added to the RPS with the description as originally provided in the public notices.

RPS Nos. 8877 and 8878: Former Royal Hospital Infirmmary, former Infirmmary and former Officer's House, Military Road, Dublin 8

One submission received:

- Office of Public Works DCC-C38-DRAFT-1477

Summary of Submission and Response

Summary

The OPW have reviewed the RPS as part of the draft DCDP 2022-28 and is supportive of the additions proposed, in particular:

8877 Military Road, Dublin 8 Dublin 8 - Former Royal Hospital Infirmmary: Former Infirmmary
8878 Military Road, Dublin 8 Dublin 8 - Former Royal Hospital Infirmmary: Former Officer's House

Response

Noted.

Chief Executive's Recommendation

No change. It is recommended that the structures are added to the RPS with the descriptions as originally provided in the public notices.

RPS No. 8886: Grand Canal Graving Docks, South Docks Road, Dublin 4

One submission received:

- IWAI (Inland Waterways Association of Ireland) DCC-C38-DRAFT-1015

Summary of Submission and Response

Issue No. 1

IWAI warmly welcomes the action by DCC in adding the Ringsend Graving Docks site to the RPS.

Response

Noted.

Issue No. 2

Under provisions in the DCDP we would appreciate if there was specific reference to this neglected site which would be an aid to full and appropriate restoration.

Response

The graving docks are situated within the designated area of the Strategic Development Zone (SDZ) for North Lotts and Grand Canal Dock, for which a Planning Scheme was adopted in 2014. The SDZ Planning Scheme sets out a vision for the area that includes the Graving Docks under the theme of built heritage as follows:

‘Proposals should seek to conserve the character and physical integrity of the Grand Canal Dock. Proposals should also seek to minimise interference in original maritime, river and transport heritage, protecting quays, canal walls, docks, graving docks’ industrial fabric and allowing space around these features for amenity purposes.’ (Section 4.6.5.4)

Other objectives relevant to the Graving Docks in the SDZ Planning Scheme include:

- **BH2** To ensure that redundant dock water spaces are managed and re-used in a way that respects their significance and utilises their potential.
- **BH4** To conserve the character and physical integrity of the Grand Canal Dock and its sea locks, the graving docks, historic marine artefacts, street furniture, views and vistas to preserve its identity.
- **BH8** To minimise interference in original maritime and river and transport heritage, thereby protecting quays, canal walls, docks, graving docks’ industrial fabric and allowing space around these features for amenity purposes.
- **BH10** To retain and promote the industrial heritage of the area by keeping rail, canal, military and maritime fabric, plant and structures in situ and to adapt for reuse.

Chief Executive’s Recommendation

No change. It is recommended that the structure is added to the RPS with the description as originally provided in the public notices.

RPS No. 8888: RTE, Stillorgan Road, Donnybrook, Dublin 4, Five Buildings at RTE Campus

One submission received:

- John Spain Associates on behalf of property owner (RTE) (Ref. DCC-C38-DRAFT-1061)

Summary of Submission and Responses

A summary of the issues raised in the submission and the responses to those issues are provided below:

Issue No. 1

The submission includes a Heritage Significance Report prepared by Citydesigner (Townscape and Heritage Consultants), with the findings endorsed in a statement of support by Scott Tallon Walker Architects. The assessment concurs that the Television Building, Restaurant Building, Administration Building and Radio Building meet the criteria for inclusion on the RPS, though suggests in respect of the Television Building, Administration Building and Radio Building that protection is limited to the facade only, with the exception of the inclusion of the helical staircase in the Television Building. In respect of the Restaurant Building the submission concurs with the recommendation of the Conservation Section though recommends exclusion of the cafeteria fittings, display equipment, counters, kitchen layout and kitchen equipment from the protection. The submission justifies the suggested limitation of the extent of protection, in relation to the Television Building, Administration Building and Radio Building ‘in view of the fact that built-in flexibility was key to the original design concept’.

A letter written by Ronnie Tallon (architect for the buildings) in 2010 is referenced in the submission which concludes that “*the history of the architecture of the campus at RTE is one of evolution, each decade producing needs and changes which required adaptation and innovation in design to resolve the issues which arose in a harmonious way and to deliver a satisfactory aesthetic and functional outcome*”. The submission also includes a statement from RTE which further sets out the position in relation to “*the ever-changing area of technology and the need to adapt the buildings to respond to these changes*”.

Response

The Chief Executive recognises the importance of the continued use of these buildings by RTE and acknowledges that the best way to protect our architectural heritage is by means of the continuous, viable use of these structures, with appropriate adaptation where required. The significance of the RTE Donnybrook complex as the home of national radio and television is also recognised, as is the requirement to continue active television and radio operations within these purpose-built structures. Therefore, it is accepted that this will mean managing adaptation, change and intervention to enable these buildings and carefully considered new

and/or extended facilities to respond to the evolving operational requirements of RTE.

The Heritage Significance Report included in the submission provides an assessment of the interior of each of the buildings proposed for addition, supported by a photographic record. It is accepted that some interior elements, including a number of the studio spaces, have been altered over time. However, the record highlights internal fabric within each structure that is considered by the Conservation Section to be of special interest (and noted during site inspection by the Conservation Section on 30th November 2018). This surviving internal historic fabric includes architectural features such as the helical staircase, secondary staircases, textured concrete columns, demountable timber and glazed partition walls (painted and unpainted) to the Television Building; granite wall cladding, textured concrete columns and timber and glazed partition walls (some now painted) to the Administration Building; and timber and glazed partition walls to the Radio Building; the 2018 inspection also noted an unaltered recording studio.

The proposed addition of these structures to the RPS does not preclude the carrying out of appropriate works, modifications, extensions and other development that respect the architectural character and special interest of the buildings. RPS designation is not intended to prohibit development, but to manage material alterations and adaptation through the planning process in accordance with the requirements of the Planning and Development Act, 2000 (as amended) and the Architectural Heritage Protection Guidelines for Planning Authorities (2011).

Section 57 of the Planning and Development Act 2000 (as amended) enables the owner or occupier of a Protected Structure to make a written request to the planning authority for a declaration which, would provide more precise details of the nature and extent of protection of each building in this instance (subject to inspection), and set out those works which would or would not be exempted development in the opinion of the planning authority.

Dublin City Council administers a number of grant funding schemes on behalf of the Department of Housing, Local Government and Heritage which provide financial support to owners and occupiers of protected structures in the repair, restoration and reinstatement of their historic character and architectural interest.

Issue No. 2

The submission requests exclusion of the Scene Dock Building from the RPS entry noting that the original purpose as a workshop for the construction of sets has long become redundant. The submission maintains that inclusion of the Scene Dock Building on the RPS would stifle potential redevelopment of the site. The Heritage Significance Report included in the submission states that 'the building meets one of the five criteria for architectural interest, based on its authorship by Ronnie Tallon. It is not considered to be an architectural exemplar, or a prime contributor to the overall setting of the campus; nor is it in possession of significant interiors. It has no historical; cultural; or social interest. It does not meet the criteria for artistic; archaeological; or scientific interests and only marginally holds a technical interest'.

Response

The Scene Dock building built c.1965 was designed as an ancillary structure providing support facilities to the television building, as such it forms an integral component of the wider grouping which, as accepted by the submission, is the work of a known and distinguished architect, Ronald Tallon. Despite its utilitarian nature, notable architectural features include the clerestory steel windows (with rounded corner detailing and tinted glass), and the lightweight exposed trussed roof structure predating a similar system of roof construction at the PJ Carroll tobacco factory, Dundalk (1967-70). It is noted that the Heritage Significance Report, which forms part of the Draft Development submission, identifies the 'lightweight roof and the well-crafted and continuous clerestory windows' as 'exemplary components'. However, it is accepted that the interior of the Scene Dock Building is not of special interest or significance. Therefore, it is proposed to amend the proposed RPS description for the Scene Dock Building to read 'exterior (only) and lightweight trussed roof structure'.

The Chief Executive recognises the national role of the RTE Donnybrook complex and the need to maintain and improve broadcasting facilities. Proposals for significant alterations and/or expansion, will be the subject of one or more applications for planning permission, which will be assessed on their merits in the development management process, having regard to the relevant material considerations, including the provisions of the Dublin City Development Plan at that time.

Chief Executive's Recommendation

Amendment: It is recommended that the description as originally provided in the public notices be amended as follows:

Proposed Description in Draft Development Plan

| RPS Ref No | Address | Description |
|------------|---|---|
| 8888 | Stillorgan Road, Donnybrook, Dublin 4 | RTE Campus: 5 buildings comprising: (1) Television Building, 1962 and 1979 extension; (2) Scene Dock Building c. 1965-69 <u>{(exterior and lightweight trussed roof structure);}</u> (3) Restaurant Building c. 1965 (excluding later extension); (4) Administration Building, 1967 (excluding later extension); and (5) Radio Building, 1973. |

RPS No. 3651: 4 Henrietta Street, Dublin 1

No submissions received, but the City Council's Conservation Section have received separate email correspondence from an owner of abutting property regarding the issue of property rights and the statutory notification procedures relating to this proposed amendment.

The Chief Executive notes that the building at 4 Henrietta Street, Dublin is already on the City Council's Record of Protected Structures, described as a 'House'. It is noted that a 'protected structure' includes the following:

- The interior of the structure,
- The land lying within the curtilage of the structure,
- Any other structures lying within that curtilage and their interiors, and
- All fixtures and features which form part of the interior or exterior of these (above) structures.

Accordingly, it is the opinion of the Chief Executive that the current description is adequate and, therefore, recommends that the proposed amendment to RPS No. 3651 be withdrawn. All parties to be formally notified in writing.

Chief Executive's Recommendation

The proposed amendment as advertised to be withdrawn; i.e. the description of the listing to remain as on the current Record of Protected Structures:

Existing Listing

| RPS Ref No | Address | Description |
|-------------------|------------------------------|--------------------|
| 3651 | 4 Henrietta Street, Dublin 1 | House |

Part 2: Other Submissions received regarding the Proposed Additions to the Record of Protected Structures of the Dublin City Development Plan 2022-2028

Summaries of submissions received

1. In relation to the 17 proposed additions to the RPS at the CIE Works in Inchicore, the LDA note the details and description of these proposed additions is taken from a 2013 assessment informing the inclusion of the structures on the NIAH without the benefit of a more recent appraisal and site visit.

Response

A more up-to-date appraisal informed by a site visit and inspection of the structures is recommended as part of the Conservation Section's work programme, following the adoption of the Dublin City Development Plan 2022-2028.

Section 57 of the Planning and Development Act 2000 (as amended) enables the owner or occupier of a Protected Structure to make a written request to the planning authority for a declaration which, would provide more precise details of the nature and extent of protection of each building in this instance (subject to inspection), and set out those works which would or would not be exempted development in the opinion of the planning authority.

2. In addition to the submissions received and responded to in Part 1 of this Report, support was also received from various bodies for additions to the RPS, as follows:

The OPW support the proposed additions to the RPS; in particular RPS 8877- Former Royal Hospital Infirmary: Former Infirmary, RPS 8878 Former Royal Hospital Infirmary: Former Officer's House, RPS 8798 Acres Road, Phoenix Park and RPS 8829 Custom House Quay. (DCC-C38-Draft-1477).

There were submissions of support for the addition of the apartments at Echlin Street to the RPS (DCC-C38-Draft-1583) and the addition of Ringsend Graving Docks to the RPS. (DCC-C38-Draft-1015).

Technical University Dublin and Grangegorman Development Agency support the intention of DCC to add the Bradogue building (former infirmary) and the Glassmanogue building (former Infirmary) to the Record of Protected Structures.

Response

Noted.

3. One submission commented that while there have been 51 additions to the RPS it is regrettable that there have been 129 deletions and that more funding should be given to speed up additions to the Record of Protected Structures.

Response

128 of the deletions referred to relate to the designation of Architectural Conservation Areas (ACAs) for the Haddon Road, Victoria Road and Hollybrook Road areas, and the associated 'delisting' or deletion of most of the dwellings in these areas from the City Council's RPS. The ACAs provide for policies and objectives for the protection of the architectural character of the streetscapes and frontages of buildings in these areas, but not the interiors of buildings. The other more recent deletion from the RPS was for a modern three-storey apartment block, constructed in 1974 on the site of a demolished 19th century house; added to RPS in error in 1999.

4. A number of submissions noted that there were only two new additions to the RPS from the 20th Century: the former Central Bank on Dame Street and the RTE radio and television complex at Montrose in Donnybrook and that this is unacceptable, given the Council's Heritage Officer commissioned an important body of research on Dublin's 20th century architecture and requested that all of the buildings documented in the 'More than Concrete Blocks' series should be added to the RPS.

Response

A further 19 structures dating from between 1900 and 1979 are proposed for addition to the City Council's Record of Protected Structures in this Draft Development Plan; including 3 railways buildings from 1900-1920; 3 commercial buildings dating between 1900 and 1929; 3 library buildings from circa 1935; 2 domestic houses built in 1935; a former newspaper building (1935); 3 former military buildings from 1900 and 1945; a school from 1935-40; a former cinema 1935-40; the former Guinness Theatre c. 1950-55 and the Scott Tallon Walker Papal Cross from 1979. 20th century structures are one of the prioritised categories for RPS assessment as part of the ongoing work programme of the Conservation Section; - it is noted that seventeen 20th century structures were added to RPS between 2016 and 2022.

5. Sandymount and Merrion Residents Association (SAMRA) calls for the survey of Sandymount in regard to the NIAH to be expedited so that appropriate buildings and areas in the village and its environment are suitably protected. They request the tramways complex on Gilford Road and Gilford Terrace, sheds, rails, cottages, mounting stones, cobbles etc. are added to the RPS.

Response

This is a matter for the National Inventory of Architectural Heritage (NIAH) and the Department of Housing, Local Government and Heritage. Dublin City Council has no remit in relation to the survey work of the NIAH.

6. It was submitted that the Record of Protected Structures needs to be greatly expanded and include buildings such as the buildings adjacent to the Merchants Arch.

Response

The NIAH has completed its survey of this area. Merchants' Arch, 48-49 Wellington Quay, Dublin 2, is already a Protected Structure (RPS Ref. No. 1864). No. 47 Wellington Quay is not on the Draft RPS, though the City Council has received a Ministerial Recommendation for its addition under Section 53 of the Act. These Ministerial Recommendations for proposed additions to the RPS are will join the list of addition nominations and recommendations, included in the Conservation Section's work programme, to be agreed with the Dublin City Planner, following the adoption of the Dublin City Development Plan 2022-2028.

Chief Executive's Recommendation

No change.

Part 3: Submissions Requesting Additions to the Record of Protected Structures

Summaries of submissions received:

- a) Houses on Cowper Road, East of Milltown Path

Response

These houses are not on the City Council's Draft RPS in the Draft Dublin City Development Plan 2022-2028. This area has been surveyed by the NIAH in their on-going, phased survey of the architectural heritage of Dublin city. The Conservation Section await the results of the survey, but these have not been issued to date.

- b) Industrial water tower, Prospect Square, Glasnevin (DCC-C38-Draft-379)

Response

This area has been surveyed by the NIAH in their on-going, phased survey of the architectural heritage of Dublin city. The NIAH have not recorded the structure as being of 'Regional' or higher architectural heritage significance, such as would merit its proposed addition to the City Council Record of Protected Structures (RPS).

- c) The historical realm of Saint Pappin's Church and Holy Well, Santry.

Response

St. Pappin's Church and Holy Well are already on the City Council's RPS (RPS 1543) The parcel of land associated with both structures is within the curtilage of those protected structures is also protected, by definition of the Planning and Development Act, 2000 (as amended) and the Architectural Heritage Protection Guidelines for Planning Authorities (2011).

- d) Tolka Park

Response

This area has been surveyed by the NIAH in their on-going, phased survey of the architectural heritage of Dublin city. The NIAH have not recorded the structure as being of 'Regional' or higher architectural heritage significance, such as would merit its proposed addition to the City Council Record of Protected Structures (RPS).

- e) Ringsend Graving Docks

Response

The Ringsend Graving Docks are proposed for addition in the Draft RPS of this Draft Dublin City Development Plan; refer to RPS 8886 Ringsend Graving Docks

- f) Houses on Leinster Road, Rathmines such as Eagle Lodge.

Response

Eagle House Lodge was previously assessed by the Conservation Section and was not considered to be of sufficient special interest as provided in Section 51 of the Act to merit its proposed addition to the City Council's RPS.

- g) 1-6 Lower Mount Street

Response

1-6 Lower Mount Street, Dublin 2, are not on the City Council's Draft RPS for the Draft Dublin City Development Plan 2022-2028. This area has been surveyed by the NIAH in their on-going, phased survey of the architectural heritage of Dublin City. As a result, the City Council has received a Ministerial Recommendations for their addition under Section 53 of the Act. These will join the list of addition nominations and recommendations, as part of the Conservation Section's work programme, to be agreed with the Dublin City Planner, following the adoption of the Dublin City Development Plan 2022-2028

- h) Houses on Grosvenor Road in Rathmines such as 52-60 Grosvenor Road.

Response

52-60 Grosvenor Road, are not on the City Council's Draft RPS in the Draft Dublin City Development Plan 2022-2028. This area has been surveyed by the NIAH in their on-going, phased survey of the architectural heritage of Dublin city. The Conservation Section await the results of the survey, but these have not been issued to date.

- i) 'Grand Canal Dock' sign located close to the Dock House, South Dock Road.

Response

This area has been surveyed by the NIAH in their on-going, phased survey of the architectural heritage of Dublin city. The NIAH have not recorded this feature/structure as being of 'Regional' or higher architectural heritage significance, such as would merit its proposed addition to the City Council Record of Protected Structures (RPS).

- j) 159 and 161 Rathmines Road Lower.

Response

159 and 161 Rathmines Road, are not on the City Council's Draft RPS as part of the Draft Dublin City Development Plan 2022-2028. This area has been surveyed by the NIAH in their on-going, phased survey of the architectural heritage of Dublin city. The Conservation Section await the results of the survey, but these have not been issued to date.

- k) 66-75 Grosvenor Road

Response

66-75 Grosvenor Road, are not on the City Council's Draft RPS as part of the Draft Dublin City Development Plan 2022-2028. This area has been surveyed by the NIAH in their on-going, phased survey of the architectural heritage of Dublin city. The Conservation Section await the results of the survey, but these have not been issued to date.

- l) 17, 18 and 19 Grosvenor Road

Response

17, 18 and 19 Grosvenor Road, are not on the City Council's Draft RPS as part of the Draft Dublin City Development Plan 2022-2028. This area has been surveyed by the NIAH in their on-going, phased survey of the architectural heritage of Dublin city. The Conservation Section await the results of the survey, but these have not been issued to date.

- m) 52-66 Grosvenor Road

Response

52-66 Grosvenor Road, are not on the City Council's Draft RPS as part of the Draft Dublin City Development Plan 2022-2028. This area has been surveyed by the NIAH in their on-going, phased survey of the architectural heritage of Dublin city. The Conservation Section await the results of the survey, but these have not been issued to date.

- n) Eagle House Lodge, Leinster Road.

Response

Eagle House Lodge was previously assessed by the Conservation Section and was not considered to be of sufficient special interest as provided in Section 51 of the Act to merit its proposed addition to the City Council's RPS.

- o) 1-6 Lower Mount Street:

Response

1-6 Lower Mount Street, Dublin 2, are not on the City Council's Draft RPS as part of the Draft Dublin City Development Plan 2022-2028. This area has been surveyed by the NIAH in their on-going, phased survey of the architectural heritage of Dublin city. As a result, the City Council has received a Ministerial Recommendations for their addition under Section 53 of the Act. These will join the list of addition nominations and recommendations, as part of the Conservation Section's work programme, to be agreed with the Dublin City Planner, following the adoption of the Dublin City Development Plan 2022-2028.

- p) 1-14 Cowper Road, Rathmines

Response

1-14 Cowper Road, Rathmines, are not on the City Council's Draft RPS as part of the Draft Dublin City Development Plan 2022-2028. This area has been surveyed by the NIAH in their on-going, phased survey of the architectural heritage of Dublin city. The Conservation Section await the results of the survey, but these have not been issued to date.

- q) 135 Morehampton Road

Response

135 Morehampton Road, Dublin 4, is not on the City Council's Draft RPS as part of the Draft Dublin City Development Plan 2022-2028. This area has been surveyed by the NIAH in their on-going, phased survey of the architectural heritage of Dublin city. The Conservation Section await the results of the survey, but these have not been issued to date.

- r) Telephone House on Marlborough Street (DCC-C38- Draft-1529):

Response

This area has been surveyed by the NIAH in their on-going, phased survey of the architectural heritage of Dublin city. The NIAH have not recorded the building as being of 'Regional' or higher architectural heritage significance, such as would merit its proposed addition to the City Council Record of Protected Structures (RPS).

- s) Several submissions including the OPW are keen to see the Iveagh Gardens given individual protection on the RPS. (DCC-C38-Draft-1477).

Response

The Iveagh Gardens, Dublin 2, are not on the City Council's Draft RPS as part of the Draft Dublin City Development Plan 2022-2028. This area has been surveyed by the NIAH in their on-going, phased survey of the architectural heritage of Dublin city. As a result, the City Council has received a Ministerial Recommendation for its addition under Section 53 of the Act. This will join the list of addition nominations and recommendations, as part of the Conservation Section's work programme, to be agreed with the Dublin City Planner, following the adoption of the Dublin City Development Plan 2022-2028.

- t) Corpus Christi Church, Griffith Avenue.

Response

Corpus Christi Church, Griffith Avenue, is not on the City Council's Draft RPS as part of the Draft Dublin City Development Plan 2022-2028. This area has been surveyed by the NIAH in their on-going, phased survey of the architectural heritage of Dublin city. As a result, the City Council has received a Ministerial Recommendation for its addition under Section 53 of the Act. This Ministerial Recommendation will join the list of addition nominations and recommendations, as part of the Conservation Section's work programme, to be agreed with the Dublin City Planner, following the adoption of the Dublin City Development Plan 2022-2028.

- u) Buildings adjacent to Merchants Arch

Response

The NIAH has completed its survey of this area. Merchants' Arch, 48-49 Wellington Quay, Dublin 2, is already a Protected Structure (RPS Ref. No. 1864). No. 47 Wellington Quay is not on the Draft RPS, though the City Council has received a Ministerial Recommendation for its addition under Section 53 of the Act. These Ministerial Recommendations for proposed additions to the RPS are will join the list of addition nominations and recommendations, included in the Conservation Section's work programme, to be agreed with the Dublin City Planner, following the adoption of the Dublin City Development Plan 2022-2028.

- v) Terrace of Victorian houses on Drumcondra Road Lower (exact location unclear from submission)

Response

Location description is unclear and cannot be identified.

- w) McCartney Bridge linking Baggot Street Upper and 1792 Huband Bridge, Mount Street Crescent.

Response

Both bridges are already on the City Council's RPS (RPS Ref. Nos. 871 & 872).

Chief Executive's Recommendation

No change re: all above (a) to (w) inclusive)

Part 4: Submission requesting a Deletion from the Record of Protected Structures:

Summary of submissions received:

RPS 6430: 99 Parnell Street.

Response

This area has been surveyed by the NIAH in their on-going, phased survey of the architectural heritage of Dublin city. The NIAH have not recorded the building as being of 'Regional' or higher architectural heritage significance, such as would merit its proposed addition to the City Council Record of Protected Structures (RPS). Accordingly, the assessment of this request for the deletion of 99 Parnell Street from the City Council's RPS will be included in the Conservation Section's work programme, to be agreed with the Dublin City Planner, following the adoption of the Dublin City Development Plan 2022-2028.

Chief Executive's Recommendation

No change.

Volume 5 – Strategic Environmental Assessment

Volume 5: Strategic Environmental Assessment

Submission Number(s):

0347 0583 0678 0888 0890 1025 1029 1037 1048 1448 1480 1483
1491 1500 1623 1653 1717 1735 1749 1761 1769 1817 1818 1821
1851 1872 2126

Strategic Environmental Assessment and the Chief Executive's Report

In compliance with the Strategic Environmental Assessment Directive (2001/42/EC) and in accordance with Article 13B of the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436 of 2004) (as amended), the Planning Authority has carried out a Strategic Environmental Assessment (SEA) as part of the preparation of the Draft Development Plan.

The Strategic Environmental Assessment process has informed the Chief Executive's Report on Submissions received on the Draft Development Plan 2022-2028 so that it can be implemented successfully without having adverse effects on the environment.

All amendments proposed to the plan have been screened for likely significant effects on the environment. It has been determined that with the successful implementation of mitigation measures contained within the plan, there will be no significant impact on the environment as a result of implementing the plan.

Submissions on the Environmental Report / Strategic Environmental Assessment

This section of the CE's Report addresses submissions made on the Draft Development Plan's Environmental Report / the SEA of the Plan.

Submissions from the Office of the Planning Regulator (OPR) and from the Eastern and Midlands Regional Assembly (EMRA) have been addressed in this CE's Report under Volume 1.

Volume 5 Environmental Report / Strategic Environmental Assessment

Summary

A submission makes the following comments on / in relation to SEA / the SEA Environmental Report:

- Consider attaching the Non-Technical Summary for the Dublin City Council Development Plan 2022-2028 to *Volume 5 SEA (Environmental Report)* and to highlight, in the contents / Introduction section as relevant, where the NTS can be easily accessed.
- Where the potential for likely significant effects have been identified, the Environmental Report should provide appropriate mitigation measures to avoid or minimise these. The Plan should include clear commitments to implement the mitigation measures.

- The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It should consider and deal with the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered. The monitoring programme should set out the various data sources, monitoring frequencies and responsibilities. If the monitoring identifies adverse impacts during the implementation of the Plan, it should be ensured that suitable and effective remedial action is taken.

The submission also provides links to current SEA-related guidance on the EPA website, including on monitoring and to the State of the Environment Report (2020). The submission sets out that an SEA Statement must be prepared when the Plan is adopted. Guidance is provided on what the statement should contain and what authorities it should be sent to.

Another submission welcomes inclusion of the County Geological Sites at Table 5.4 of the SEA Environmental Report. It commends inclusion of GSI groundwater datasets, geothermal datasets, natural resources data. The submission provides additional information and links to further data, including in relation to geochemistry of soils, surface waters, and sediments.

A submission states that the Plan has not addressed the potential effects on Natura 2000 sites of supply of the current and future water requirements for the city and also has not addressed the potential effects of nitrogen dioxide levels on Natura 2000 sites.

Chief Executive's Response

The Non-Technical Summary of the SEA Environmental Report for the Dublin City Council Development Plan 2022-2028 forms part of Volume 5 SEA (Environmental Report). The Environmental Report for the Material Amendment stage and the final Plan will include and reference the Non-Technical Summary.

Mitigation has been provided for likely significant effects in Chapter 9 of the SEA Environmental Report. Environmental considerations have informed the preparation of the Plan and, therefore, the policies and objectives of the Plan have been framed to avoid or mitigate potential adverse impact. Mitigation will continue to be reviewed and updated where required during the plan-making process. Appropriate mitigation will be provided where potential significant effects are identified and these will be set out in the Environmental Report.

The monitoring programme with data sources, frequencies and responsibilities is set out in Chapter 10 of the SEA Environmental report. The programme is set up to capture both positive and negative effects. The section will be reviewed to ensure flexibility and to incorporate possibility of cumulative effects. Any changes required will be included in the updated Environmental Report.

The monitoring section will be reviewed to allow for the taking of suitable and effective remedial action should adverse impacts arise during implementation. Any changes required will be included in the updated Environmental Report.

An SEA Statement will be prepared when the Plan is adopted.

Environmental baseline and environmental references in the Environmental Report will be updated, where appropriate, to take account of information provided in the submissions.

The submission on the potential effects on Natura 2000 sites of supply of the current and future water requirements for the city and the potential effects of nitrogen dioxide levels on Natura 2000 sites is addressed in this CE Report under Volume 6 Appropriate Assessment.

Chief Executive's Recommendation

To update Environmental baseline and environmental references in the Environmental Report where appropriate, to take account of information provided in the submissions. The mitigation and monitoring sections of the Environmental Report will be continued to be reviewed and updated where appropriate and in line with the continuing plan-making process, to take account of the information provided in the submissions.

Volume 6 – Appropriate Assessment

Volume 6: Appropriate Assessment

Submission Number(s):

0347 0583 0678 0888 0890 1025 1029 1037 1048 1448 1480 1483
1491 1500 1623 1653 1717 1735 1749 1761 1769 1817 1818 1821
1851 1872 2126

Appropriate Assessment of the Chief Executive's Report

In accordance with the requirements of Article 6(3) of the EU Habitats Directive (92/43/EEC) on the Conservation of Natural Habitats and of Wild Fauna and Flora; the Planning and Development Act 2000 (Part XAB) (as amended); and the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended), the Planning Authority has screened the recommendations in the Chief Executive's Report on submissions received for the Draft City Development Plan for any likely significant effects on European sites.

The preparation and adoption of the City Development Plan 2022-2028 is subject to Appropriate Assessment, as required by the European Habitats Directive (92/43/EEC). The Appropriate Assessment is a focused assessment of the implications of the City Development Plan 2022-2028, alone and in combination with other plans and projects, on the integrity of European sites in view of the conservation objectives of the European sites.

The Appropriate Assessment process has informed the Chief Executive's Report on submissions received on the Draft Development Plan 2022-2028 so that it can be implemented successfully without having adverse effects on the integrity of European sites. It has concluded (at this time) that, with the implementation of the mitigation measures contained within the plan, there will be no adverse effects on the integrity of European sites arising from the plan in isolation or in combination with other plans and projects.

Submissions on Appropriate Assessment (AA) of the Plan / Natura Impact Statement

This section of the CE's Report addresses submissions made on the Draft Development Plan's Appropriate Assessment of the plan process.

Submissions from the Office of the Planning Regulator (OPR) and from the Eastern and Midlands Regional Assembly (EMRA) have been addressed in this CE's Report under Volume 1.

Volume 6 Appropriate Assessment of the Plan / Natural Impact Statement

Summary

A submission states that the Council should take into account the possibility that the implementation of the Plan might affect named Natura 2000 sites from which water is currently abstracted to supply the city such as the Poulaphouca Reservoir Special Protection Area (SPA) and the Glenasmole Valley Special Area of Conservation

(SAC) and sites such as the River Shannon and River Fergus Estuaries SPA and the Lower Shannon SAC, which may be affected in future by plans to source water from the Shannon river system to meet Dublin's increased water demand.

The submission states that the Natura Impact Report (NIR) prepared in support of the Draft City Development Plan does not refer to or attempt an evaluation of the possible effects of the implementation of the CDP on the above mentioned sites.

Similarly, it states that it is not clear from the Screening Determination if these sites were considered and discounted, as discounted sites are not named in the Screening Determination and the AA Screening Report has not been published.

The submission recommends, in the case that these sites have not been considered, that the AA Screening of the finalised City Development Plan should consider the possible effects on Natura 2000 sites of catering for such water needs, and if significant effects on such sites are considered likely, a Stage 2 AA should be undertaken on the potential effects on these European sites of the water abstraction required for the implementation of the 2022-2028 City Development Plan.

The submission is also seeking that the AA Screening Report in relation to the finally adopted CDP should in any case be published with the latter document as well as the NIR supporting the CDP.

A submission states that the possible effects of nitrogen deposition on Natura 2000 sites arising from the implementation of the Plan should be considered in the Appropriate Assessment of the Plan finally adopted by Dublin City Council.

Chief Executive's Response

The Chief Executive notes the issues raised in respect of potential effects on Natural 2000 sites arising from the need to meet Dublin city's current and future water needs.

In terms of meeting the city's current water needs it is noted that Irish Water in its submission has indicated that Dublin City's Water Supply should be adequate for the period of the Plan.

In respect of meeting the city's future water needs the Chief Executive notes that ongoing and future projects, including the new Shannon source, are identified in existing higher-level plans e.g. National Development Plan 2021 – 2030, the National Water Resource Plan Draft Framework Plan 2021, with further detail in the Irish Water Draft Regional Water Resources Plan – Eastern and Midlands plan. All of these higher level plans have been subject to their own AA process. Similarly, the Chief Executive notes that projects arising from these plans will be overseen by Irish Water and will be subject to full environmental assessment including Appropriate Assessment.

To widen the zone of influence of the DCC Plan based on the Shannon source in particular, would be inappropriate and is considered outside the remit of the DCC Plan.

In respect of current water abstraction to serve the city, this issue will be addressed as part of the iterative Appropriate Assessment of the plan making process.

Dublin City Council will publish the AA Screening and AA determinations alongside the finalised development plan, its appendices and AA Screening Screening Report and Natura Impact Report.

In respect of Nitrogen deposition, air quality issues are addressed within Section 7.2.1 of the NIR, European heath, an Annex I habitat sensitive to changes in nitrogen was considered implicitly in respect of Howth Head SAC.

A number of policies and objectives e.g. SI34, SIO21, SIO22 are included in the Draft Plan to monitor air quality so as to minimise unacceptable levels of air pollution in accordance with national (current and future plans e.g. Draft National Clean Air Strategy) and EU policy Directives on air quality and, where appropriate, drive compliance with established targets. In this regard, the Dublin Region Air Quality Plan 2021, (which was subject to SEA and AA Screening) to improve Nitrogen Dioxide levels in Dublin Region is now complete and has been submitted to the Minister for the Environment, Climate and Communications and EU Commission.

Chief Executive's Recommendation

To address the issue of current water abstraction to serve the city as part of the iterative Appropriate Assessment of the plan making process.

Volume 7 – Strategic Flood Risk Assessment

Volume 7: Strategic Flood Risk Assessment

Submission Number(s):

1480

This section of the CE's Report addresses the OPW's submission on the Draft Plan's Strategic Flood Risk Assessment (SFRA). The report addresses issues raised generally in the order they are set out in the submission.

Amendments to deal with mapping errors are captured under this section.

Other submissions on Flood Management are addressed within this CE's Report within the section on Flood Management in Chapter 9, Volume 1.

Screening of zoning amendments from a flooding perspective is addressed within a Screening Report accompanying this CE's Report.

Flood Mapping

Summary

The OPW states that it is difficult to assess the zonings / sites at flood risk or if the sequential approach has been applied as the land use zoning maps are not overlaid with the flood zone maps. It is seeking the overlaying of zoning and flooding maps for each land use-zoning maps.

See also the Office of the Planning Regulator's (OPR) submission on this issue and the Chief Executive's Response and Recommendation in Volume 1.

Chief Executive's Response

The OPW's comments are noted and the SFRA will be updated to include flood zone maps overlaid on the Development Plan Land Use Zoning Maps.

Chief Executive's Recommendation

Mapping Amendment:

A set of flood zone maps overlaid on the Land Use Zoning Maps (Maps A - H) are to form part of the SFRA.

SFRA Volume 7

Section: 2 Stage 1 – Flood Risk Identification

Section: 2.1 Development of Flood Zone Maps,

Page: 14, 2nd Para.

A wide range of data was collected and reviewed for completeness, applicability, quality and confidence in its accuracy. One of the key outcomes of the SFRA is to produce a Flood Zone Map which, along with other planning considerations, will

inform land use zoning / development decisions. **{For further clarity the Flood Zone Map has been overlaid on the Land Use Zoning Maps A – H}.**

Appendix B

Justification Test - Part 2 (iii)

Area's 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 16A, 20, 21, 24, 25, 26, 27

Summary

The OPW notes, that for the following Justification Tests in Appendix B: Area Assessment 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 16A, 20, 21, 24, 25, 26 and 27, the lands are referred to as 'established suburbs' or 'established residential areas'. It states that this is not consistent with the criteria that the areas are "within or adjoining the core of an established or designated urban settlement".

Chief Executive's Response

The OPW's comments are noted and the Chief Executive recommends that Justification Tests be amended to clarify that all of Dublin City is an established or designated urban settlement.

Chief Executive's Recommendation

SFRA Volume 7

Appendix B

Justification Tests, Part 2, Criteria 2

Area Assessments 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 16A, 20, 21, 22, 24, 25, 26, 27

Amendment: Insert text or amend as indicated in Table below:

| | |
|--|---|
| Justification Tests: Criteria 2 (iii) and (iv) Area 6 Page 99 Area 7 Page 105 Area 8 Page 111 | <p>(iii) Is within or adjoining the core of an established or designated urban settlement.</p> <p>Answer: Yes: The area comprises (an-existing built-up residential-suburb) <u>{part of the established / designated urban settlement}</u> of Dublin <u>{City}</u>.</p> <p>(iv) Will be essential in achieving compact and sustainable urban growth.</p> <p>Answer: Yes: The area comprises (an-existing built-up residential-suburb) <u>{part of the established / designated urban settlement}</u> of Dublin <u>{City}</u>.</p> |
| Justification Tests: Criteria 2 (iii) Area 9 Page 116 Area 10 Page 121 | <p>(iii) Is within or adjoining the core of an established or designated urban settlement.</p> <p>Answer: Yes: The lands form part of (an-established suburb-of-the-City) <u>{the established / designated urban settlement of Dublin City}</u>.</p> |

| | |
|--|---|
| Area 11 Page 126 Area 12 Page 130 Area 14 Page 139 Area 15 Page 144 Area 16 Page 149 Area 16A Pg. 154 Area 20 Page 174 Area 21 Page 179 Area 22 Page 184 Area 24 Page 194 Area 25 Page 198 | |
| Justification Tests: Criteria 2 (iii) Area 26 Page 202 Area 27 Page 207 | (iii) Is within or adjoining the core of an established or designated urban settlement. Answer: Yes: (The area is an established residential area to the north east of Dublin City.) <u>{The lands form part of the established / designated urban settlement of Dublin City}.</u> |

Appendix B and Appendix C

Area Assessment No.'s 2, 7, 11, 12, 15, 16, 17, 18, 19, 21, 24, 29

SDRA's 1, 6, 7, 11, 15

Justification Test (JT's)

Conclusion

Summary

The OPW notes that the mitigation measures outlined in the JT's for Area Assessments No.'s 2, 7, 11, 12, 15, 16, 17, 18, 19, 21, 24, and 29, restrict development to that which would not require a Justification Test. It is stated that consideration could be given to amending the conclusion to the Justification Tests.

Chief Executive's Response

The OPW's comments are noted and the conclusions to the Justification Test's for the Area Assessments outlined above were reviewed in light of these comments. The conclusions to the Justification Tests for Areas 22A and 26 were also reviewed in light of the OPW's comments. The CE considers it appropriate to alter the conclusions to the relevant Justification Tests to say that development is permissible except where it is indicated that it is restricted.

Following the referred review, the conclusions to the Justifications Tests for the SDRA's (Appendix C2) were also reviewed and these similarly are to be amended as required.

Chief Executive's Recommendation

SFRA Volume 7

Appendix B

Justification Test Conclusions

Area's 2, 7, 11, 12, 15, 16, 17, 18, 19, 21, 22A, 24, 26, 29

Amendment: Insert Text or amend as indicated in the Table below.

| | |
|--|--|
| <p>Justification Test Part 3, 1st Bullet Point & Conclusion:</p> <p>Area 2 Page: 78</p> | <ul style="list-style-type: none"> Use classes considered as '<u>Highly</u>' Vulnerable Development' shall not be permitted in Flood Zone A or B (this includes essential infrastructure such as primary transport and utilities distribution including electricity generating power stations and sub stations, water and sewage treatment, and potential significant sources of pollution (SEVESO, IPPC sites etc.). <p>Conclusion: The subject area <u>passes</u> the Justification Test for Development Plans <u>{for less vulnerable development. Highly vulnerable development should be avoided in Flood Zone A and B.}</u>.</p> |
| <p>Justification Test Part 3, Insert New bullet point no. 4, Page 105 & Conclusion:</p> <p>Area 7 Page: 106</p> | <ul style="list-style-type: none"> <u>{Redevelopment of areas for less vulnerable uses in Flood Zone A and B is acceptable, subject to specific considerations, as set out below.}</u> <p>Conclusion: The subject area <u>passes</u> the Justification Test for Development Plans <u>{for less vulnerable development. Highly vulnerable development should be avoided Flood Zone A and B.}</u>.</p> |
| <p>Justification Test Conclusion:</p> <p>Area 11 Page 126 Area 12 Page 130 Area 15 Page 145 Area 16 Page 149 Area 22A P.g. 188 Area 24 Page 195 Area 26 Page 203 Area 29 Page 214</p> <p>&</p> <p>Area 24, JT, Part 3, New 2nd Bullet Point</p> | <p>Conclusion: The subject area <u>passes</u> <u>{Part 1 and 2 of }</u> the Justification Test for Development Plans <u>{but Part 3 has found that new development should be located in Flood Zone C and avoid Flood Zone A and B.}</u></p> <ul style="list-style-type: none"> <u>{New development should avoid Flood Zones A or B.}</u> |
| <p>Justification Test Conclusion:</p> <p>Area 17 Page 160</p> | <p>Conclusion: The subject area <u>passes</u> <u>{Part 1 and 2 of }</u> the Justification Test for Development Plans <u>{but Part 3 has found that new development should avoid Flood</u></p> |

| | |
|--|---|
| Area 18 Page 165 Area 19 Page 170 | <u>Zone A and only less vulnerable development is appropriate in previously developed parts of Flood Zone B.}</u> |
| Justification Test Conclusion: Area 21 Page 180 | Conclusion: The subject area <u>passes</u> the Justification Test for Development Plans <u>{only where development is in previously defended parts of Flood Zone A/B, and the standard of protection and residuals risks are assessed and meet the requirements laid out in the SFRA}</u> . |

SFRA Volume 7
Appendix C2
Justification Tests Conclusions
SDRA's 1, 6, 7, 11, and 15

Amendment: Insert text as indicated in the Table below.

| | |
|---|---|
| Justification Test Conclusion: SDRA 1 SDRA 7 SDRA 11 | Conclusion: The subject SDRA <u>passes</u> <u>{Part 1 and 2 of }</u> the Justification Test for Development Plans <u>{but Part 3 has found that new development should be located in Flood Zone C and avoid Flood Zone A and B.}</u> |
| Justification Test Conclusion SDRA6 | Conclusion: The subject SDRA <u>passes</u> the Justification Test for Development Plans <u>{only where development is in previously defended parts of Flood Zone A / B, and the standard of protection and residual risks are assessed and meet the requirement laid out in the SFRA.}</u> |
| Justification Test Conclusion SDRA15 | Conclusion: The subject SDRA <u>passes</u> <u>{Part 1 and 2 of }</u> the Justification Test for Development Plans <u>{but Part 3 has found that new development should avoid Flood Zone A and only less vulnerable development is appropriate in previously developed parts of Flood Zone B.}</u> |

Policies / Objectives to Outline Restrictions / Mitigation Measures

Summary

The OPW is seeking that restrictions / measures to mitigate identified flood risk outlined in the SFRA, including under Part 3 of the Justification Tests, be incorporated into the Written Statement of the Plan and be supported by policies or objectives. This is recommended in respect of JT's for Area Assessments No's, 2, 7, 10, 11, 12, 15, 16, 17, 18, 19, 21, 24, 26 and 29 in Appendix B and SDRA1 in Appendix C2.

Chief Executive's Response

The OPW's comments are noted. It is not considered feasible or appropriate to incorporate the referred restrictions / measures to mitigate identified flood risk outlined in the SFRA and Justifications Tests in Appendix B and C into the Development Plan Written Statement.

In this regard, the Chief Executive recommends that Policy SI14 Strategic Flood Risk Assessment in Chapter 9, Section 9.5.3 Flood Management of the Written Statement is amended to respond to this request.

Similarly, the Chief Executive recommends that Section 13.2 Overarching Principles and Vision / Objective SDRAO1, in Chapter 13 Strategic Development and Regeneration Areas (SDRA's), of the Written Statement is amended to include a new sub heading 'Flood Risk' which signposts the SFRA and its related measures to mitigate identified flood risk in SDRA's.

Chief Executive's Recommendation

The amendment to Policy SI14, Chapter 9, Section 9.5.3 Flood Management of the Written Statement is addressed within this CE Report within the section under Flood Management, in Chapter 9, in Volume 1.

The amendment to Section 13.2 Overarching Principles and Vision in Chapter 13 SDRA's is addressed within this CE Report within the section under Overarching Principles and Vision, Objective SDRAO1, Section 13.2 in Chapter 13 in Volume 1.

Policy / Objective Applying the Sequential Approach to Flood Risk

Area 22 A. Finglas Stream: East of Finglas Road and West of North Road

Summary

The OPW is seeking a policy / objective in the Written Statement of the Development Plan seeking that the sequential approach is applied in the site planning of lands zoned for development where a small proportion of the site is at risk of flooding. This is to ensure no encroachment onto, or loss of the flood plain, or that only water compatible development such as Open Space would be permitted for the lands which are identified as being at risk of flooding within that site. Planning permission

for these sites might then be subject to the sequential approach having been adopted and applied as above, following a detailed FRA.

A similar observation has been made in respect of Area 22 A. Finglas Stream: East of Finglas Road and West of North Road.

Chief Executive's Response

To address this submission, it is considered appropriate to amend Policy SI15 Site-Specific Flood Risk Assessment under Section 9.5.3 Flood Management, in Chapter 9, of the Written Statement to respond to this request.

In the interests of clarity, it is considered that text should be added to Part 3 of the Justification Test for Area Assessment No. 22A Finglas Stream: East of Finglas Road and West of North Road, to spell out that highly or less vulnerable development in flood zones A and B must be avoided or limited to minor development.

Chief Executive's Recommendation

The amendment to Policy SI15 Site Specific Flood Risk Assessment, is addressed within this CE Report within section Flood Management, in Chapter 9 of the Written Statement in Volume 1.

SFRA Volume 7

Appendix B

Area 22A Finglas Stream: East of Finglas Road and West of North Road

Justification Test, Part 3

Add text to last sentence

Amendment:

The area is mainly located within Flood Zone C for fluvial flooding. Some small portions of the lands are within Flood Zone A and Flood Zone B. Most development reasonably be accommodated within the extents of Flood Zone C **{so highly or less vulnerable development in Flood Zone A and B must be avoided or limited to Minor Development (Section 5.28 of the Planning Guidelines)}.**

SFRA Section 2.3 Climate Change

Summary

The OPW is seeking that consideration be given to climate change impacts in the plan-making stage, such as by avoiding development in areas potentially prone to flooding in the future, providing space for future flood defences, and setting specific development management objectives.

Chief Executive's Response

The review and incorporation of climate change into the plan making process is discussed in Section 2.3 of the SFRA main document. It is, therefore, not proposed to amend the SFRA document.

The Appendix B Justification Tests have been revisited to ensure the zoning decisions reflect the level of flood risk under both current and future scenarios. It is proposed to change the text in Appendix B to reflect the level of climate change risk and the approach required to manage it (Justifications Tests Part 3). The review of climate change risks has not led to any changes in zoning objectives or overall flood management strategy. Minor changes have been made to Policies SI13, SI15, SI16, SI18, SI19, SI21, and Objective SIO12 in this respect.

Chief Executive's Recommendation

The amendment to Policies SI13, SI15, SI16, SI18, SI19, SI21, and Objective SIO12, is addressed within this CE Report within section Flood Management, in Chapter 9 of the Written Statement in Volume 1.

SFRA Volume 7

Appendix B

Area's 1, 3, 5, 6, 8, 9, 16A, 19, 20, 21, 22A, 25, 26

Justification Tests, Part 3

Amendment:

Insert Text or Amend as Indicated below in Table

| | |
|--|---|
| Area Assessment Sensitivity to Climate Change Area 1, page 69 | Delete Text: The area is highly sensitive to climate change and an increase of 0.5m on top of the 200 year tide level would put much of it underwater. (A 1m rise in sea level should be assessed for high vulnerability/ high risk developments, including SEVESO and other industrial uses.) |
| Area Assessment Justification Test Part 3, 2nd Bullet Point Area 2, page 77 | Add to Text: <ul style="list-style-type: none"> Within this area it is essential that the impact of sea level rise by 0.5m for ordinary sites and 1.0m for critical/ highly vulnerable infrastructure and high risk chemical sites is carried out <u>{, even for development in Flood Zone C}</u>. For some developments it may be appropriate to include a more detailed assessment of likely climate change impacts, including the frequency of lower return periods and wave action. There may also be a flood route through this site to areas outside of it. |
| Appendix B Justification Test Part 3 Area 3, page 84 Area 5, page 95 Area 6, page 100 Area 8, page 111, | Insert bullet point: <ul style="list-style-type: none"> <u>{Climate change risks are significant and need to be assessed under the site specific FRA with guidance on finished floor levels applied as detailed in the SFRA.}</u> |

| | |
|---|---|
| <p>Area 9, page 116 Area 19, page 170 Area 20, page 174 Area 21, page 180 Area 26, page 202</p> | |
| <p>Area Assessment Sensitivity to Climate Change</p> <p>Area 9, page 114</p> | <p>Add to Text:</p> <p>An increase of 0.65m for climate change, on top of the 200-year tide level, has been catered for in all of the flood wall and embankment designs. <u>{However, the potential impact of climate change in undefended areas, or in the event of defence overtopping or failure, is significant.}</u></p> |
| <p>Area Assessment Sensitivity to Climate Change</p> <p>Area 16A, page 153</p> | <p>Delete Text:</p> <p>Climate change will increase flood risk in this area also blockage of some river screens. (A 20% increase in rainfall to the year 2100 is to be assumed for vulnerable developments and 30% for highly vulnerable developments.)</p> |
| <p>Area Assessment Sensitivity to Climate Change</p> <p>Area 22A, page 186</p> | <p>Amend Text:</p> <p>Climate change will increase flood risk in this area <u>{and may increase the risk of}</u> (also) blockage of some river screens. (A 20% increase in rainfall to the year 2100 is to be assumed for vulnerable developments and 30% for highly vulnerable developments.)</p> |
| <p>Appendix B Justification Test Part 3</p> <p>Area 25, page 198</p> | <p>Amend First Bullet Point:</p> <ul style="list-style-type: none"> Modelling shows that risks are primarily linked to the development of overland flow paths which progress along roads. FRAs for developments should specifically address this risk, both to ensure flow paths do not become obstructed and to ensure an appropriate standard of flood resilient construction, which should include (where possible) raising finished floor levels to a minimum of 300mm above road/ pavement height. <u>{An assessment of culvert performance with climate change increases should also be undertaken.}</u> |

Section 2 Stage 1 Flood Risk Identification

Section 2.1 Development of Flood Risk Zone Maps

Summary

The submission seeks that reference is made in the SFRA to the newly established Inter-Departmental Group on Coastal Change Management.

The submission highlights that reference has been made in the written statement and the SFRA to the Irish Coastal Protection Strategy Study (ICPSS) 2013 as a source of information on coastal flood risk. The OPW states that this has, however, been updated by the Irish Coastal Wave and Water Level Modelling Study (ICWWS) 2018, and the National Coastal Flood Hazard Mapping, 2021.

Chief Executive's Response

The SFRA already references the Inter-Departmental Group on Coastal Change Management and its work at Section 2.2.1 Coastal and Tidal Flooding. The Chief Executive notes the OPW's submission in respect of the ICWWS 2018 report and the National Coastal Flood Hazard Mapping, 2021, and recommends that Section 2.1 of the SFRA be up dated accordingly.

Chief Executive's Recommendation

SFRA Volume 7

Section 2 Stage 1 – Flood Risk Identification

Section 2.1 Development of Flood Zone Maps, Page 14

2nd and 6th Paragraphs on Page 14

Amendment:

In particular, the datasets that have been used are the Dodder, Fingal East Meath and Eastern CFRAM flood extents/zones, River Tolka and River Wad Flooding Studies, the Poddle modelling study, {the Irish Coastal Wave and Water Level Modelling Study (ICWWS) 2018, and the National Coastal Flood Hazard Mapping, 2021}, records of historical flood events, walkover survey and consultation with local authority area engineers.

The Irish Coastal Protection Strategy Study (ICPSS) and the Dublin Coastal Flood Protection Project (DCFPP) ~~(also provide extreme sea levels and coastal flood maps but~~ have been ~~largely superseded by the CFRAM maps and)~~ {updated by the Irish Coastal Wave and Water Level Modelling Study (ICWWS) 2018, and the National Coastal Flood Hazard Mapping, 2021 and these} ~~(The ICPSS outlines)~~ were cross-checked against the other available datasets. Coastal erosion maps have also been reviewed and used to inform the assessment of risk in the city.

Section 4.3 Consideration of Surface Water in All Areas

Summary

The OPW recommends that the SFRA provide guidance on the likely applicability of different SuDs techniques for managing surface water run-off at key development sites, and also that the SFRA identifies where integrated and area based provision of SuDs and green infrastructure are appropriate in order to avoid reliance on individual site by site solutions.

Chief Executive's Response

The Draft Plan has identified nature based sustainable drainage design (SuDs) as the preferred way of managing rainfall from new development – Policies SI22 – SI26 in Chapter 9 and Objective SIO13 refers.

To achieve this the Council has committed to the preparation of citywide studies on surface water management and green infrastructure in the city; it has prepared Technical Guidance documents on SuDs / Green Roofs and Surface Water Management for new development; and, the Draft Plan identifies development sites in the city for which local statutory plans / masterplans are to be prepared and under which integrated and area based provision of SuDs can be investigated.

It is considered that Section 4.3 of the SFRA (Consideration of Surface Water in All Areas) should be amended to set out the Council's approach to integrated and area based provision of SuDs and green infrastructure.

Chief Executive's Recommendation

SFRA Volume 7

Main SFRA Document

Section 4.3 Consideration of Surface Water in All Areas

Page 39

New First Paragraph etc.

Amendment:

{The Draft Plan has identified nature based sustainable drainage design (SuDs) as the preferred way of managing rainfall from new development – Policies SI22 – SI26 in Chapter 9 refer and Objective SIO13 refers.

Conventional drainage systems in the city are at capacity, are ageing and are under pressure due to climate change and urban development. There is a need to build resilience into the city's drainage system to deal with both current and future pressures.

Appropriately designed nature based SuDs will make a valuable contribution to Dublin City - reducing flood risk, improving water quality, supporting biodiversity and generally making the city a more pleasant and healthy environment in which to live, work and visit.

To achieve this, the Council has given a commitment to prepare a surface water framework for the city and a green infrastructure strategy. The Council has prepared a technical SuDs guidance document for new development. It is anticipated that there will be opportunities for integrated and area based provision of SuDs and GI in the new development areas of the city.

(1) SuDs / GI Strategies

Objective SIO9: Planning for Surface Water Management

It is an objective of the Council to undertake surface management plans for each river catchment, and this will include a study of relevant zoned lands within the city in order to ensure that sufficient land is provided for nature-based surface water management, SuDs and green infrastructure.

Objective GIO2 Preparation of a Green Infrastructure Strategy for Dublin City
The Council has also committed to the preparation of a Green Infrastructure Strategy for Dublin City that will include a newly developed set of green micro areas.

(2) Technical Guidance Documents / Requirements

The Council has prepared the following guidance documents to inform sustainable Drainage Design and evaluation and to guide surface water management at the area and site level as follows:

Sustainable Drainage Design & Evaluation Guide 2021, Dublin City Council (Summarised in Appendix 12 - Technical Summary of DCC SuDs Design and Evaluation Guidance Document, 2021)

This guidance document sets out nature based SuDs techniques to facilitate the best possible SuDs designs for the city. The guide is to be used in the design of SuDs for new developments in the city.

The Council has also produced a Green Blue Roof Guidance Documents 2021 (a Technical Summary of which can be found in Appendix 11 of the Development Plan Written Statement).

Appendix 13 – Dublin City Council Surface Water Management (SWMP) Guidance

This guidance document requires the preparation of SWMP's as part of the plan making / master plan process. It also requires the preparation and submission of SWMP's with applications for planning permission.

(3) Strategic Development and Regeneration Areas (SDRA's)

Chapter 13 of the Written Statement of the Development Plan identifies 17 Strategic Development and Regeneration Areas (SDRA's) in the city. Section 13.2 Overarching Principles and Vision, of Chapter 13, sets out a series of overarching urban planning principles for the development of these lands including Surface Water Management and Green Infrastructure principles.

A masterplan approach is required for a number of sites within the individual SDRA's and therefore there will be opportunities to address the integrated and area based provision of SuDs.

(4) Area Plans

Over the lifetime of the Development Plan the Planning Authority will prepare Local Statutory Plans for large scale strategic landbanks at Kylemore Road / Naas Road / Ballymount (City Edge) and lands at Glasnevin (Dublin Industrial Estate). Integrated and area based provision of SuDs and green infrastructure will be developed for these areas as part of the plan making process.

Appendix B

Area 6 Liffey: Sarah Bridge, South Circular Road to Anna Livia Br. Chapelizod Justification Test, Part 3

Summary

The OPW notes that reference is made to the pending completion of the Liffey CFRAM Study under this JT. The submission suggests that Dublin City Council clarify whether this refers to the Eastern CFRAM study, which was completed in 2018.

Chief Executive's Response

This refers to the completion of construction of flood defences and investigation of the reliability of existing flood defences at Chapelizod and adjacent to the Liffey. It refers to a new required study.

Chief Executive's Recommendation

SFRA Volume 7

Appendix B

Area 6

Justification Test, Part 3

Last bullet point Last Sentence

Page: 100

Amendment:

Area 6. Liffey: Sarah Bridge, South Circular Road to Anna Livia Br. Chapelizod

"Where flood risk (either existing or residual) is high it would be considered premature to proceed with development until a Flood Relief Scheme has been completed}. ~~(the Liffey CFRAM Study is complete".)~~

Appendix B and C

Area 8 Coastal: Sandymount

Area 9. Dodder: Liffey to Ballsbridge

Area 10. Dodder: Ballsbridge to Donnybrook Bridge

SDRA 15: Liberties and Newmarket Square

Justification Tests – Part 3

Summary

The OPW has highlighted that in respect of Part 3 of the Justification Tests for Area Assessments 8, 9, 10 and SDRA 15, that Flood Relief Schemes are designed to mitigate the risk of flooding to existing communities and properties, rather than release land in flood risk areas for further development.

Chief Executive's Response

The OPW's comments are noted. It is considered that having new flood defences in place reduces the restrictions on development and may alter restrictions on such developments as per this SFRA and the main Development Plan.

Chief Executive's Recommendation

SFRA Volume 7

Appendix B

Area 8. Coastal: Sandymount

Justification Test, Part 3

First bullet point Last Sentence

Page: 111

Amendment:

Further development in Flood Zone A and B should not be progressed prior to proposed flood defences being completed. Small scale development, such as extensions, is acceptable, but larger scale development is premature. ~~(until works have been completed.)~~ {Once completed, new flood defences may alter restrictions on such developments and a reappraisal of flood risk would be appropriate at the project design stage, as per this SFRA and the main Development Plan.}

SFRA Volume 7

Appendix B

Area 9. Dodder: Liffey to Ballsbridge

Justification Test, Part 3

Third bullet point

Page: 116

Amendment:

Even in areas which are defended from the tidal extents of the Dodder, given the high risk of tidal inundation in Sandymount, coupled with the varying standard of the flood defences and the high vulnerability nature of the current land use, the specific flood risk assessment has found that further development in Flood Zone A and B should not be progressed prior to the completion of flood defences ~~(on the Dodder to Ballsbridge and)~~ at Sandymount, where relevant. Small scale development, such as extensions, is acceptable, but larger scale development is premature in areas

with lower defence status ~~(until flood works have been completed.)~~ {Once completed, new flood defences may alter restrictions on such developments and a reappraisal of flood risk would be appropriate at the project design stage, as per this SFRA and the main Development Plan.}

SFRA Volume 7

Appendix B

Area 10. Dodder: Ballsbridge to Donnybrook Bridge

Justification Test, Part 3

First bullet point. New Last Sentence

Page: 121

Amendment:

Where the defences have not been completed, all but very small scale extensions and changes of use would be considered premature. {Once completed, new flood defences may alter restrictions on such developments and a reappraisal of flood risk would be appropriate at the project design stage, as per this SFRA and the main Development Plan.}

SFRA Volume 7

Appendix C

SDRA 15: Liberties and Newmarket Square

Justification Test, Part 3

2nd Paragraph, First Sentence

Amendment:

Residential development within these sites on Flood Zone B would be premature. ~~(pending completion of proposed flood defence works.)~~

Appendix B

Area 16 A. Poddle: Terenure Road West, Templeogue Road to Boundary

Justification Test, Part 3

Summary

The submission details that part 3 of the Justification Test states that: “Most development could reasonably be accommodated within the extents of Flood Zone C and commercial development within Flood Zone B. The construction of the River Poddle FAS may change development possibilities in the lifetime of this Development Plan.” The OPW suggests that clarification might be provided as to whether development in Flood Zones A and B is restricted.

Chief Executive’s Response

The OPW’s comments are noted. It is considered appropriate to alter Area 16A Poddle: Terenure Road West, Templeogue Road to Boundary, to clarify restrictions in Flood Zones A and B.

Chief Executive's Recommendation

SFRA Volume 7

Appendix B

Area 16A

Justification Test, Part 3

Second Last Sentence

Page: 154

Amendment:

Most development could reasonably be accommodated within the extents of Flood Zone C {, so there should be no highly vulnerable development in Flood Zone A or B, and} (commercial) {less vulnerable} development {should be limited to} (within) Flood Zone B {or C}. The construction of the River Poddle FAS may change development possibilities in the lifetime of this Development Plan.

Appendix B

Area 22 Tolka: St. Mobhi Road – Finglas Road **Zoning**

Summary

The submission states that the car park in Tolka House pub is zoned residential and is in Flood Zone B.

Chief Executive's Response

The Chief Executive acknowledges that the car park in Tolka House pub is zoned residential and is located in Flood Zone B. The area behind the Tolka Pub is behind a recently constructed flood wall. It is considered that Z3 (neighbourhood centre) and Z9 (open space) Land Use Zoning Objectives would be more suitable given the flood risk and it would complement the existing commercial land use.

Chief Executive's Recommendation

The zoning amendment to the Tolka House site is addressed within this CE Report within Volume 3.

Appendix B

Area 26. Clontarf Alfie Byrne Road to Wooden Bridge **Justification Test, Part 3**

Summary

The OPW notes that it is stated in the Justification Test that small scale extensions/changes of use may be justified under certain conditions. It suggests that clarification might be provided as to whether development is restricted to that set out

above, and if so, this might be incorporated into the plan supported by suitable policies or objectives.

Chief Executive's Response

This Area Assessment area is located in flood Zones A and B where development is restricted to the procedures outlined in this SFRA and Development Plan, however, small scale extensions/changes may be permitted.

Chief Executive's Recommendation

SFRA Volume 7

Appendix B

Area 26 Justification Test, Part 3

Second Last Sentence

Page 202

Insert bullet point (to be bullet point no. 4)

- {Major new, highly or less vulnerable development, in Flood Zone A or B should be avoided.}

Appendix C

SDRA1: Clongriffin / Belmayne and Environs **Justification Test, Part 3**

Summary

The submission notes that it is stated in the Justification Test that any development other than green infrastructure could reasonably be accommodated within Flood Zone C, and should not need to extend into Flood Zones A and B. It is suggested that clarification might be provided as to whether any development is restricted to Flood Zone C.

Chief Executive's Response

There is no restriction on development in Flood Zone C except any portion of it which may be affected by extensions of Flood Zone A and B due to climate change.

Chief Executive's Recommendation

SFRA Volume 7

Appendix C

SDRA1: Clongriffin / Belmayne and Environs

Justification Test, Part 3

Last Sentence

Amendment:

Any other development could reasonably be accommodated within the extents of Flood Zone C and ~~(should not need to)~~ {must not} extend into Flood Zones A and B.

Mapping Error

The CE notes a mapping error in respect of the Poddle River as shown on the Flood Zone Map and consequently as shown on inset maps in Appendix B and C.

Chief Executive's Response

The Flood Zone Map (Composite Map Appendix E) has been amended to show the correct configuration of the Poddle River. Consequently, inset maps for Area Assessments No.'s 13 to 16 A in Appendix B and inset maps for SDRA 11 St. Teresa's Gardens and Environs, SDRA 12 Dolphin House, and SDRA 15 Liberties and Newmarket Square will also be updated.

The relevant Assessments /Justification Tests have been revisited to ascertain if zoning decisions / specific flood risk assessments require changing / updating. This has not led to any changes in zoning objectives or any changes in the overall flood management strategy as it pertains to the River Poddle.

As a result of this map correction, it is considered that the references to flooding constraints at the Coombe Hospital site in Chapter 13, SDRA's in the Written Statement, and, in SDRA Assessment St. Teresa's Gardens and Environs in Appendix C2 of the SFRA should be omitted.

Consequently, the screening tables for the relevant SDRA's in the Poddle Area Assessments will be updated in the final SFRA.

Chief Executive's Recommendation

SFRA Volume 7

Appendix E Composite Flood Map

&

Inset Maps for Area Assessments No. 13 – 16A in Appendix B

&

Inset Maps for SDRA 11 St. Teresa's Gardens and Environs, SDRA 12 Dolphin House, and SDRA 15 Liberties and Newmarket Square in Appendix C2

Mapping Amendment

Amend the Flood Zone Map (Composite Map Appendix E) to show the correct configuration of the Poddle River. Inset maps for Area Assessments No.'s 13 to 16 A in Appendix B and inset maps for SDRA 11 St. Teresa's Gardens, SDRA 12 Dolphin House, and Environs and SDRA 15 Liberties and Newmarket Square to be consequently amended.

Volume 1, Written Statement

Chapter 13 Strategic Development and Regeneration Area
Section 13.13 SDRA 11 St. Teresa's Gardens and Environs
Urban Structure, First Paragraph, page 561

Amendment:

The potential for further integration with the Coombe Hospital is indicated on the Guiding Principles Map but is indicative only. ~~(Regard will need to be had to any flooding constraints in the redevelopment of the Coombe Hospital lands in terms of land use and block layout.)~~

Volume 7 SFRA

Appendix C2

SDRA 11 St. Teresa's Gardens and Environs

Part 3 of Justification Test – Specific Flood Risk Assessment

Amendment:

3. Specific Flood Risk Assessment

The SDRA is located primarily within Flood Zone C. A section of the north eastern part of the lands is located in Flood Zone B. The sequential approach will be adopted and the open space area for the development will be within Flood Zone B. ~~(The Coombe Hospital site is subject to flooding. The redevelopment of the Coombe Hospital site must have regard to flooding constraints in terms of land use and block layout to ensure the avoidance approach is followed, and that appropriate finished floor levels are set).~~

Part 4: List of Persons / Bodies that Made Submissions/ Observations

| Submission Name | Portal Ref No | Agent/Company |
|--------------------------------------|---------------|--|
| S-00755 - Philip Briggs | 0001 | |
| S-00766 - Lee Daly | 0002 | |
| S-00756 - Proinsias Mac Fhlannchadha | 0003 | |
| S-00767 - Donnchadh Mac Aogain | 0004 | |
| S-00768 - CorporateSupport Unit | 0005 | Dep of Environment, Climate and Communications |
| S-00769 - Daniel Byrne | 0006 | |
| S-00770 - Jack Murtagh | 0007 | |
| S-00772 - Jack Brophy | 0008 | |
| S-00771 - Ben Clavin | 0009 | |
| S-00775 - Aidan Geraghty | 0010 | |
| S-00774 - Tony Colgan | 0011 | |
| S-00777 - Eve Kearney | 0012 | |
| S-00779 - Padraic Fitzpatrick | 0013 | |
| S-00778 - Stephen Kavanagh | 0014 | |
| S-00776 - Darren Cleary | 0015 | |
| S-00780 - David Singleton | 0016 | |
| S-00773 - Adrian Harte | 0017 | |
| S-00781 - Karl Fitzmaurice | 0018 | |
| S-00783 - David Murphy | 0019 | |
| S-00784 - Stephen Dowling | 0020 | |
| S-00785 - Katie Tobin | 0021 | |
| S-00786 - Kevin Moher | 0022 | |
| S-00787 - Pamela Reilly | 0023 | |
| S-00788 - Kevin Taylor | 0024 | |
| S-00790 - Chloe Martin | 0025 | |
| S-00789 - Patrick O Dwyer | 0026 | |
| S-00791 - Sean McDonald | 0027 | |
| S-00794 - Caolan Carroll | 0028 | |
| S-00793 - Lukas Skorupa | 0029 | |
| S-00782 - Dean O'Rourke | 0030 | |
| S-00796 - Daniel Hegney | 0031 | |
| S-00797 - Gerard Martyn | 0032 | |
| S-00798 - Ruaidhri Croke | 0033 | |
| S-00800 - Kris Foulk | 0034 | |
| S-00801 - Daniel Byrne | 0035 | |
| S-00792 - Gavin Doherty | 0036 | |
| S-00795 - Ciarán McCarthy | 0037 | |
| S-00803 - Lisa Kennedy byrne | 0038 | |
| S-00802 - Ciaran Kelly | 0039 | |
| S-00804 - Aaron Gallagher | 0040 | |
| S-00805 - Glen McRory | 0041 | |

| | |
|------------------------------|------|
| S-00806 - Alan Doody | 0042 |
| S-00807 - Keith Redican | 0043 |
| S-00808 - Jason Fay | 0044 |
| S-00809 - Sam Bradshaw | 0045 |
| S-00810 - Laura Nolan | 0046 |
| S-00811 - Brian Stafford | 0047 |
| S-00812 - Eoin Deane | 0048 |
| S-00813 - Noah Rigney | 0049 |
| S-00814 - Karl Reilly | 0050 |
| S-00815 - David Sexton | 0051 |
| S-00816 - kate keogh | 0052 |
| S-00817 - Harry Brennan | 0053 |
| S-00818 - Kevin Doyle | 0054 |
| S-00819 - Eric Frazer | 0055 |
| S-00820 - Kevin Walsh | 0056 |
| S-00822 - Cian McCann | 0057 |
| S-00823 - Craig Darcy | 0058 |
| S-00825 - Ruairi De Cleir | 0059 |
| S-00824 - Noel Conway | 0060 |
| S-00826 - thomas murphy | 0061 |
| S-00827 - Ian Whelan | 0062 |
| S-00828 - Ann Bradley | 0063 |
| S-00830 - Ian Lewis | 0064 |
| S-00829 - Adam Murphy | 0065 |
| S-00831 - Anthony TURNER | 0066 |
| S-00832 - Cáelán Tummon | 0067 |
| S-00834 - Paul Wilde Wilde | 0068 |
| S-00833 - John Looney | 0069 |
| S-00835 - Caroline Wilde | 0070 |
| S-00836 - David Murray | 0071 |
| S-00837 - Ciarán Carrick | 0072 |
| S-00838 - Siobhán Bermingham | 0073 |
| S-00839 - Ryan Dinger | 0074 |
| S-00840 - Joshua Hotca | 0075 |
| S-00841 - Conor Dunphy | 0076 |
| S-00842 - Andrew McCarthy | 0077 |
| S-00843 - Fintan Cassidy | 0078 |
| S-00844 - David Courtney | 0079 |
| S-00845 - Adam Browne | 0080 |
| S-00847 - Luke Gallagher | 0081 |
| S-00848 - Gavin Redmond | 0082 |
| S-00846 - Sean Nutley | 0083 |
| S-00849 - Alan Kelly | 0084 |
| S-00850 - Stephen Lesware | 0085 |

| | |
|-----------------------------------|------|
| S-00851 - Conor Keenan | 0086 |
| S-00852 - Kevin Bonnie | 0087 |
| S-00853 - James Daly | 0088 |
| S-00856 - Conal Mac Mahon | 0089 |
| S-00858 - Chris Mellon | 0090 |
| S-00859 - Niall O'Connell | 0091 |
| S-00861 - James O'Dwyer | 0092 |
| S-00860 - Stuart Lerner | 0093 |
| S-00862 - Gavin Blunnie | 0094 |
| S-00864 - Gerard McMahon | 0095 |
| S-00863 - Jack Kennedy | 0096 |
| S-00865 - Dan Doolan | 0097 |
| S-00866 - Patrick Murphy Gilligan | 0098 |
| S-00867 - Paul Harkin | 0099 |
| S-00868 - Ciara Hennigan | 0100 |
| S-00870 - Jordan O Reilly | 0101 |
| S-00869 - Shauna O'Farrell | 0102 |
| S-00872 - Alex Doyle | 0103 |
| S-00871 - Brian Foran | 0104 |
| S-00873 - Mark Coleman | 0105 |
| S-00857 - Rory Monaghan | 0106 |
| S-00874 - Christopher Blunnie | 0107 |
| S-00877 - Lorna O'Farrell | 0108 |
| S-00879 - Alan Gibbons | 0109 |
| S-00876 - Jim Doherty | 0110 |
| S-00881 - Seana Cooke | 0111 |
| S-00880 - James Lowe | 0112 |
| S-00883 - Eoin Scully | 0113 |
| S-00882 - Eoin Smith | 0114 |
| S-00878 - Brian Oneill Oneill | 0115 |
| S-00884 - Eoin O Rourke | 0116 |
| S-00875 - Conor Redmond | 0117 |
| S-00885 - Stephen O'Beirne | 0118 |
| S-00887 - Bobbi Kiberd | 0119 |
| S-00886 - Sean Keating | 0120 |
| S-00889 - Joseph Smith | 0121 |
| S-00890 - Ciaran O'Rourke | 0122 |
| S-00854 - Adam Peel | 0123 |
| S-00892 - Paul Sheridan | 0124 |
| S-00888 - Niall Burke | 0125 |
| S-00893 - Gavin Cryan | 0126 |
| S-00894 - Jason Colligan | 0127 |
| S-00895 - Rian Lanigan | 0128 |
| S-00896 - Karl Carrick | 0129 |

| | |
|-----------------------------|------|
| S-00897 - Sylvia McLoughlin | 0130 |
| S-00898 - Niall Creevey | 0131 |
| S-00899 - Lorcan McGrath | 0132 |
| S-00900 - Craig Long | 0133 |
| S-00891 - Martin Coyle | 0134 |
| S-00901 - Lorcan Dooley | 0135 |
| S-00902 - Lorcan Reilly | 0136 |
| S-00903 - Andrew Doherty | 0137 |
| S-00904 - ANTHONY CARRICK | 0138 |
| S-00821 - Jonathan Breach | 0139 |
| S-00905 - Kevin Kelleher | 0140 |
| S-00906 - Anthony Walker | 0141 |
| S-00907 - Holly Murphy | 0142 |
| S-00908 - Simon Crowe | 0143 |
| S-00909 - Adrienne Hogan | 0144 |
| S-00910 - Diarmuid North | 0145 |
| S-00911 - Sean Buckley | 0146 |
| S-00912 - Eoin Glennon | 0147 |
| S-00913 - Emily Harrington | 0148 |
| S-00915 - Katie Dudley | 0149 |
| S-00916 - Paul Glennon | 0150 |
| S-00914 - Barry Crossan | 0151 |
| S-00917 - Paul Flood | 0152 |
| S-00918 - Jean Glennon | 0153 |
| S-00919 - Sarah Glennon | 0154 |
| S-00921 - Eimear Glennon | 0155 |
| S-00920 - Gianluca Eusepi | 0156 |
| S-00922 - Eoin O'Donnell | 0157 |
| S-00923 - Sean Manley | 0158 |
| S-00924 - Kevin Haughey | 0159 |
| S-00926 - Dominic Flood | 0160 |
| S-00929 - Dominic Glennon | 0161 |
| S-00928 - STEPHEN GREGAN | 0162 |
| S-00925 - Margaret Coyle | 0163 |
| S-00932 - Gareth Murray | 0164 |
| S-00931 - Shane Kavanagh | 0165 |
| S-00933 - Brian Chaney | 0166 |
| S-00934 - Sean Conlan | 0167 |
| S-00935 - Paul O'Dea | 0168 |
| S-00936 - Caroline Murray | 0169 |
| S-00937 - Margaret Creevey | 0170 |
| S-00938 - Ian Thorp | 0171 |
| S-00939 - John Whipple | 0172 |
| S-00940 - Jason Breach | 0173 |

| | |
|--------------------------------|------|
| S-00941 - Alan O'Malley | 0174 |
| S-00942 - Jennifer Taaffe | 0175 |
| S-00943 - Robert Gaffney | 0176 |
| S-00946 - Denis Creevey | 0177 |
| S-00944 - Conor Broderick | 0178 |
| S-00945 - Bernadette Frazer | 0179 |
| S-00947 - Mark Frazer | 0180 |
| S-00949 - Cian Simpson | 0181 |
| S-00950 - Eoin Brennan | 0182 |
| S-00948 - James Doherty | 0183 |
| S-00952 - A BARCROFT | 0184 |
| S-00951 - Harry Fleming | 0185 |
| S-00953 - John Fay | 0186 |
| S-00954 - Ian Brunton | 0187 |
| S-00955 - Ger Deegan | 0188 |
| S-00956 - David Rose | 0189 |
| S-00957 - Sean Deegan | 0190 |
| S-00958 - Christine O'Sullivan | 0191 |
| S-00959 - Malcolm McCabe | 0192 |
| S-00960 - Robert Mccann | 0193 |
| S-00961 - Caoimhin O Faolain | 0194 |
| S-00962 - Maurice Frazer | 0195 |
| S-00963 - Jack Naughton | 0196 |
| S-00964 - Brendan O'Meara | 0197 |
| S-00965 - Anthony McCluskey | 0198 |
| S-00967 - John Frazer | 0199 |
| S-00966 - Stephen Moran | 0200 |
| S-00969 - Tommy Byrne | 0201 |
| S-00968 - Matthew Keegan | 0202 |
| S-00970 - William Abbott | 0203 |
| S-00972 - Rory Mcgrath | 0204 |
| S-00971 - brendan bradley | 0205 |
| S-00973 - Sarah Louise Kelly | 0206 |
| S-00974 - Aisling Kealy | 0207 |
| S-00975 - Linda Byrne | 0208 |
| S-00976 - Jen Mahon | 0209 |
| S-00977 - Paul Behan | 0210 |
| S-00978 - Colin Sheeran | 0211 |
| S-00979 - Ciaran Doyne | 0212 |
| S-00980 - Ken Doyne | 0213 |
| S-00981 - Maria Doyne | 0214 |
| S-00982 - Caitriona Daly | 0215 |
| S-00983 - Brendan Nevin | 0216 |
| S-00984 - Colm Ward | 0217 |

| | |
|--------------------------------|------|
| S-00985 - Colm Ward | 0218 |
| S-00986 - Ciaran Healy | 0219 |
| S-00987 - Mazzy Hollerich | 0220 |
| S-00988 - Jamie Kelly | 0221 |
| S-00989 - Dan Fitzpatrick | 0222 |
| S-00991 - Daniel Brooks | 0223 |
| S-00990 - Mick Fitzpatrick | 0224 |
| S-00992 - Paul Worthington | 0225 |
| S-00993 - Gareth Dunne | 0226 |
| S-00994 - Andrea Fitzpatrick | 0227 |
| S-00995 - Catherine Bregazzi | 0228 |
| S-00996 - John Ryan | 0229 |
| S-00997 - Frank MCgrath | 0230 |
| S-00998 - Hugh Casey | 0231 |
| S-00999 - Bernadette O'Farrell | 0232 |
| S-01000 - Oliver O'Farrell | 0233 |
| S-01001 - Daniel Byrne | 0234 |
| S-01002 - Paul Farrell | 0235 |
| S-01003 - Cormac McGovern | 0236 |
| S-01004 - Stephen Doyne | 0237 |
| S-01005 - Anthony Mcdonnell | 0238 |
| S-01006 - Stephanie Da silva | 0239 |
| S-01007 - Jean Rafter | 0240 |
| S-01008 - Vincent Gray | 0241 |
| S-01010 - Barry Meehan | 0242 |
| S-01009 - Alan Worthington | 0243 |
| S-01011 - Jonathan Boyers | 0244 |
| S-01012 - David Duignan | 0245 |
| S-01013 - Dylan Cogan | 0246 |
| S-01014 - Tom Riddle | 0247 |
| S-01015 - Adam Kane | 0248 |
| S-01016 - Keith Coleman | 0249 |
| S-01017 - Will Clarke | 0250 |
| S-01018 - Ross lawlor | 0251 |
| S-01019 - Robert Ennis | 0252 |
| S-01020 - Elaine Coffey | 0253 |
| S-01022 - Gerry Deane | 0254 |
| S-01023 - Kevin Last | 0255 |
| S-01024 - Saoirse McGinn | 0256 |
| S-01025 - Mary Cassidy | 0257 |
| S-01026 - Kevin McDonald | 0258 |
| S-01027 - Fifi Cassidy | 0259 |
| S-01028 - Anto Moran | 0260 |
| S-01029 - Darragh Hogan | 0261 |

| | | |
|-----------------------------|------|----------------|
| S-01030 - James Callan | 0262 | |
| S-01032 - Bernard Daly | 0263 | |
| S-01031 - Kimberly Downes | 0264 | |
| S-01033 - Luke Crawley | 0265 | |
| S-01034 - Barry Oglesby | 0266 | |
| S-01035 - Eddie Riley | 0267 | |
| S-01036 - Kyle McLoughlin | 0268 | |
| S-01037 - Andrew McMorrow | 0269 | |
| S-01038 - Anthony Gallagher | 0270 | |
| S-01039 - David Brady | 0271 | |
| S-01040 - Brian Stafford | 0272 | |
| S-01041 - Ronan O'Connor | 0273 | |
| S-01042 - Joan Rafter | 0274 | |
| S-01043 - Luke Dunne | 0275 | Film In Dublin |
| S-01044 - Liam O'Shea | 0276 | |
| S-01047 - Sarah Frazer | 0277 | |
| S-01046 - Karl Gill | 0278 | |
| S-01049 - David Daly | 0279 | |
| S-01050 - Mark Daly | 0280 | |
| S-01051 - Aaron O'Dwyer | 0281 | |
| S-01052 - Peter Smith | 0282 | |
| S-01045 - Joe Brennan | 0283 | |
| S-01053 - stephen Dempsey | 0284 | |
| S-01055 - Tommy White | 0285 | |
| S-01056 - Conor McManus | 0286 | |
| S-01057 - Francine Galvin | 0287 | |
| S-01058 - James O'Brien | 0288 | |
| S-01060 - Eoghan Doolan | 0289 | |
| S-01059 - Adam Behan Behan | 0290 | |
| S-01061 - Paddy Bell | 0291 | |
| S-01062 - Andrew Tier | 0292 | |
| S-01063 - Larry White | 0293 | |
| S-01064 - Dylan Murphy | 0294 | |
| S-01065 - Kyle Mahon | 0295 | |
| S-01066 - Aidan Lalor | 0296 | |
| S-01067 - Robert Lenehan | 0297 | |
| S-01068 - Rachel O'Connor | 0298 | |
| S-01069 - John Martyn | 0299 | |
| S-01070 - Shane Smyth | 0300 | |
| S-01071 - Mark Campbell | 0301 | |
| S-01072 - Louis O Briain | 0302 | |
| S-01073 - Eoin Mac Craith | 0303 | |
| S-01074 - Andrew Somers | 0304 | |
| S-01075 - Andrew McCrae | 0305 | |

| | | |
|----------------------------------|------|--|
| S-01076 - Linda Hayden | 0306 | |
| S-01077 - David Balfe | 0307 | |
| S-01078 - Rob Summons | 0308 | |
| S-01079 - Robert Lyons | 0309 | |
| S-01080 - Caelan Omeara | 0310 | |
| S-01081 - Aaron Doherty | 0311 | |
| S-01084 - Amy Rooney | 0312 | |
| S-00753 - Pom Boyd | 0313 | |
| S-01085 - Philip Briggs | 0314 | |
| S-01087 - RF Property Management | 0315 | RF Property Management |
| S-00927 - Paul Watts | 0316 | |
| S-01088 - David Hughes | 0317 | |
| S-01089 - Mary Smith | 0318 | |
| S-01090 - John Smyth | 0319 | |
| S-01091 - Kyle Byrne | 0320 | |
| S-01092 - Liam Mulcahy | 0321 | |
| S-01093 - Gary Dunne | 0322 | |
| S-01094 - Olivier Verhaeghe | 0323 | |
| S-01095 - Aodhán Ó Ríordáin | 0324 | |
| S-01096 - Peter Clifford | 0325 | |
| S-01097 - James Connington | 0326 | |
| S-01098 - Linda Grehan | 0327 | |
| S-01099 - Graham Kelay | 0328 | |
| S-01100 - Ann Grehan | 0329 | |
| S-01101 - Cornelius Grehan | 0330 | |
| S-01102 - Jane Briggs Devine | 0331 | |
| S-01103 - Kieran Devine | 0332 | |
| S-01104 - Pat O'Connell | 0333 | |
| S-01105 - Reece Grehan | 0334 | |
| S-01106 - Susan Grehan | 0335 | |
| S-01107 - Tony Kelch | 0336 | |
| S-01108 - Denis Kelly | 0337 | Northern and Western Regional Assembly |
| S-01109 - Danielle McDonnell | 0338 | Department of Housing, Local Government and Heritage |
| S-01110 - Catherine McGrath | 0339 | |
| S-01111 - Catherine McGrath | 0340 | |
| S-01112 - David Wynne | 0341 | |
| S-01113 - Luke Doran | 0342 | |
| S-01114 - Alan Martin | 0343 | |
| S-01115 - Gerald O'Halloran | 0344 | |
| S-01116 - Brian Nolan | 0345 | |
| S-01117 - gary heary | 0346 | |

| | | |
|------------------------------------|------|---------------------------------|
| S-01118 - Cian O'Mahony | 0347 | Environmental Protection Agency |
| S-01119 - Frank Sheedy | 0348 | |
| S-01120 - Pom Boyd | 0349 | |
| S-01122 - David Williams | 0350 | Wrkshop Architects |
| S-01123 - Jennifer Sheekey | 0351 | |
| S-01124 - barry kearney | 0352 | |
| S-01125 - Charlie Fine | 0353 | |
| S-01126 - Nevin Gill | 0354 | |
| S-01127 - Peter Brooks | 0355 | |
| S-01128 - Colin ridgeway | 0356 | |
| S-01129 - Síle Carroll | 0357 | |
| S-01130 - Jacinta Davidson | 0358 | Drumcondra AFC |
| S-01131 - Maureen Tucker | 0359 | |
| S-01132 - Paul mc dermott | 0360 | |
| S-01133 - Adam Johnson | 0361 | |
| S-01134 - Tom Buyckx | 0362 | |
| S-01135 - Conor Phelan | 0363 | |
| S-01136 - Ken Donohoe | 0364 | |
| S-01137 - David Sheerin | 0365 | |
| S-01138 - John Costello | 0366 | |
| S-01139 - Ross Gaynor | 0367 | |
| S-01140 - Lisa Looney | 0368 | |
| S-01141 - Megan Looney | 0369 | |
| S-01142 - Sam Looney | 0370 | |
| S-01143 - michael o'callaghan | 0371 | |
| S-01144 - Kevin Kelleher | 0372 | |
| S-01145 - Aoibhin Byrne | 0373 | |
| S-01146 - Emmett Byrne | 0374 | |
| S-01147 - Jeanette Dowling | 0375 | |
| S-01148 - Liam Byrne | 0376 | |
| S-01149 - Noeleen Byrne | 0377 | |
| S-01150 - Shane Byrne | 0378 | |
| S-01151 - Alfreda O'Brien Kavanagh | 0379 | |
| S-01153 - JIM FITZPATRICK | 0380 | |
| S-01154 - Liam Ward | 0381 | |
| S-01155 - Paul Doody | 0382 | |
| S-01156 - Ken Berney | 0383 | |
| S-01157 - Gareth Donohoe | 0384 | |
| S-01158 - Dave Connolly | 0385 | |
| S-01159 - Joe Watt | 0386 | |
| S-01161 - Francis Mac Hugh | 0387 | |
| S-01162 - Paul Watson | 0388 | |
| S-01163 - Joe O'Connor | 0389 | |
| S-01164 - Joe O'Connor | 0390 | |

| | | |
|---|------|---------------------|
| S-01165 - Joe O'Connor | 0391 | |
| S-01166 - Joe O'Connor | 0392 | |
| S-01167 - Alan Grace | 0393 | |
| S-01168 - Gavin Somers | 0394 | |
| S-01169 - Kristen Carolan | 0395 | |
| S-01171 - Angela Shafer | 0396 | |
| S-01172 - martina mullane | 0397 | |
| S-01173 - Sinead Moloney | 0398 | |
| S-01174 - Cian OConnor | 0399 | |
| S-01175 - Jason Kernan | 0400 | |
| S-01176 - Michael Daly | 0401 | |
| S-01177 - Wayne Walker | 0402 | |
| S-01181 - Eamonn Dowling | 0403 | |
| S-01182 - Séamus Daltún | 0404 | |
| S-01183 - Eamonn Tierney | 0405 | |
| S-01184 - Aoife McKenna | 0406 | |
| S-01185 - Eamonn Tierney | 0407 | |
| S-01193 - Henrietta McKervey | 0408 | Canal Way ETNS |
| S-01194 - Eleanor Crowe | 0409 | |
| S-01196 - Lorcan Ward | 0410 | |
| S-01197 - Shane Dawson | 0411 | |
| S-01198 - Robert Lynch | 0412 | |
| S-01199 - Robert Lynch | 0413 | |
| S-01200 - David Horan | 0414 | |
| S-01210 - Aileen Ryan | 0415 | |
| S-01201 - Abby Cassidy | 0416 | |
| S-01204 - Adrienne O'Daid | 0417 | |
| S-01207 - Aidan Ryan | 0418 | |
| S-01213 - Alex Hannigan | 0419 | |
| S-01216 - Andrea Hannigan | 0420 | |
| S-01219 - Ann Dempsey | 0421 | |
| S-01222 - Anne Valento | 0422 | |
| S-01225 - A O'Meara | 0423 | |
| S-01228 - Annette Flanagan | 0424 | |
| S-01231 - Mason Owen and Lyons | 0425 | Bordoak Limited |
| S-01232 - Barbara Byrne | 0426 | |
| S-01235 - JJMS Properties Ltd JJMS Properties Ltd | 0427 | JJMS Properties Ltd |
| S-01236 - paul loughran | 0428 | |
| S-01237 - John Singleton | 0429 | |
| S-01238 - Barbara Whelan | 0430 | |
| S-01241 - Billy Malone | 0431 | |
| S-01244 - Breda Hurley | 0432 | |
| S-01247 - Breda Keenan | 0433 | |
| S-01250 - Richard Kavanagh | 0434 | |

| | |
|-------------------------------|------|
| S-01251 - Brendan O'Brien | 0435 |
| S-01254 - Brendan Preston | 0436 |
| S-01257 - Brian Hardyman | 0437 |
| S-01260 - Brigid Kelly | 0438 |
| S-01263 - Brigh O'Brien | 0439 |
| S-01266 - Carla Kenworthy | 0440 |
| S-01269 - Caroline Flynn | 0441 |
| S-01272 - Catherine Kelly | 0442 |
| S-01275 - Christine Preston | 0443 |
| S-01278 - Cian Watson | 0444 |
| S-01281 - Daniel Sena | 0445 |
| S-01284 - Danielle Whelan | 0446 |
| S-01287 - David Collins | 0447 |
| S-01290 - Dean Preston | 0448 |
| S-01293 - Declan Proctor | 0449 |
| S-01296 - Edel Cassidy | 0450 |
| S-01299 - Rod Maharg | 0451 |
| S-01300 - Emma Duffy | 0452 |
| S-01301 - anne judge | 0453 |
| S-01305 - Maurice Johnson | 0454 |
| S-01306 - David O'Sullivan | 0455 |
| S-01307 - Ian Cassidy | 0456 |
| S-01308 - Edward Valento | 0457 |
| S-01311 - Elaine Kelly | 0458 |
| S-01312 - Tadhg Sullivan | 0459 |
| S-01313 - Elizabeth Collins | 0460 |
| S-01316 - Elizabeth Murphy | 0461 |
| S-01319 - Gavin Rothwell | 0462 |
| S-01322 - Gerard Hurley | 0463 |
| S-01327 - Graham Kelch | 0464 |
| S-01325 - Eoin O Cofaigh | 0465 |
| S-01330 - Hannah Gilroy-Kelly | 0466 |
| S-01333 - Iris Cummins | 0467 |
| S-01336 - James Downes | 0468 |
| S-01339 - James Madde | 0469 |
| S-01342 - James O'Brien | 0470 |
| S-01345 - Jenny Murphy | 0471 |
| S-01348 - Jimmy Noonan | 0472 |
| S-01351 - Joan Tynan | 0473 |
| S-01354 - John Kelly | 0474 |
| S-01357 - John Narie | 0475 |
| S-01360 - Joseph Gorman | 0476 |
| S-01363 - Julie Kenworthy | 0477 |
| S-01366 - Kay Evans | 0478 |

| | |
|--------------------------------|------|
| S-01369 - Laura Watson | 0479 |
| S-01372 - Liam Kelly | 0480 |
| S-01373 - Peter Lafferty | 0481 |
| S-01386 - Frank Keoghan | 0482 |
| S-01404 - Lisa McMyer | 0483 |
| S-01407 - Lynda Gilroy-Kelly | 0484 |
| S-01387 - Lorraine O'Donnell | 0485 |
| S-01410 - Marie Kehoe-O'Shea | 0486 |
| S-01413 - Marie Kelch | 0487 |
| S-01416 - Mark Kelch | 0488 |
| S-01419 - Martha Kelly | 0489 |
| S-01422 - Mary Lynch | 0490 |
| S-01425 - Mary Madden | 0491 |
| S-01428 - Mary McNamee | 0492 |
| S-01431 - Mary Murphy | 0493 |
| S-01434 - Mary O'Keeffe | 0494 |
| S-01437 - Fionn Fitzpatrick | 0495 |
| S-01438 - Matt Byrne | 0496 |
| S-01441 - Matthew Kelly | 0497 |
| S-01444 - Caitlin Faughnan | 0498 |
| S-01445 - Mary Byrne | 0499 |
| S-01446 - Matthew Gilroy-Kelly | 0500 |
| S-01449 - Maura Kenworthy | 0501 |
| S-01452 - Melanie Gavin | 0502 |
| S-01455 - Michael Ryan | 0503 |
| S-01458 - Mick Mac Amhlaoibh | 0504 |
| S-01461 - Miriam Stephens | 0505 |
| S-01464 - Miriam Tracey | 0506 |
| S-01467 - Niall Heron | 0507 |
| S-01470 - Niamh Conroy | 0508 |
| S-01473 - Noel McNamee | 0509 |
| S-01476 - Paddy Byrne | 0510 |
| S-01479 - Pam Morris | 0511 |
| S-01482 - Michael McCann | 0512 |
| S-01483 - Pat Flynn | 0513 |
| S-01486 - Pat O'Keeffe | 0514 |
| S-01489 - Pat Reegan | 0515 |
| S-01492 - Pat Tracey | 0516 |
| S-01495 - Patrick Dempsey | 0517 |
| S-01498 - Paul Dunphy | 0518 |
| S-01501 - Paul Fitzmaurice | 0519 |
| S-01504 - Paul Hannigan | 0520 |
| S-01507 - Peter Evans | 0521 |
| S-01510 - Rachele McBride | 0522 |

| | | |
|------------------------------|------|----------------------|
| S-01513 - Ray Sheehy | 0523 | |
| S-01516 - Rhonda Farrell | 0524 | |
| S-01519 - Robert Hurley | 0525 | |
| S-01522 - Sadie Noonan | 0526 | |
| S-01525 - Saoirse Hannigan | 0527 | |
| S-01528 - Sarah Clarke | 0528 | |
| S-01531 - Sean Hannigan | 0529 | |
| S-01534 - Susan Lyons | 0530 | |
| S-01537 - Suzanne Walsh | 0531 | |
| S-01540 - Svetlhy Thratr | 0532 | |
| S-01543 - Thomas Hurley | 0533 | |
| S-01546 - Tom Kehoe | 0534 | |
| S-01549 - Tray Mulney | 0535 | |
| S-01552 - Vicky White | 0536 | |
| S-01555 - Alison Farrell | 0537 | |
| S-01556 - Aoife Myler | 0538 | |
| S-01557 - Borja Gomez | 0539 | |
| S-01558 - Brian Myler | 0540 | |
| S-01559 - Brian O Linn | 0541 | |
| S-01560 - Cailin Murphy | 0542 | |
| S-01561 - Callum Bashford | 0543 | |
| S-01562 - Christine McCormac | 0544 | |
| S-01563 - Claire Mhic Aogain | 0545 | |
| S-01564 - Jimmy Murray | 0546 | |
| S-01565 - Shauni Clarke | 0547 | |
| S-01566 - Colette Prendy | 0548 | |
| S-01567 - Colman O Drisceoil | 0549 | |
| S-01568 - Louis O'Flaherty | 0550 | |
| S-01569 - Louis O'Flaherty | 0551 | |
| S-01570 - Colman O hAinle | 0552 | |
| S-01571 - Ricky Whelan | 0553 | BirdWatch Ireland |
| S-01572 - Daniel J O'Regan | 0554 | |
| S-01573 - David Egan | 0555 | |
| S-01574 - David Hickey | 0556 | |
| S-01575 - Dean McGlashan | 0557 | |
| S-01576 - Derek Hennessy | 0558 | |
| S-01577 - Don Mahon | 0559 | |
| S-01578 - Eamonn Prenter | 0560 | Trinity Propserv Ltd |
| S-01579 - Eamonn Howley | 0561 | |
| S-01580 - Edel Clinton | 0562 | |
| S-01581 - Edward O'Neill | 0563 | |
| S-01582 - Feargus Mac Aogain | 0564 | |
| S-01584 - Gerald Davis | 0565 | |
| S-01585 - Gerard Corcoran | 0566 | |

| | |
|-----------------------------|------|
| S-01586 - Gerard Corcoran | 0567 |
| S-01587 - Joan Flood | 0568 |
| S-01588 - John Myler | 0569 |
| S-01589 - Karen Rooney | 0570 |
| S-01590 - Karlo Martinovic | 0571 |
| S-01591 - Kelly Harris | 0572 |
| S-01592 - Kelly McGlashan | 0573 |
| S-01593 - Kevin Vaughan | 0574 |
| S-01594 - Lauren Curley | 0575 |
| S-01595 - Leah Tierney | 0576 |
| S-01596 - michael jarocki | 0577 |
| S-01597 - Johnny Cantwell | 0578 |
| S-01598 - Leanne Maguire | 0579 |
| S-01599 - Paul O'Neill | 0580 |
| S-01600 - Liam Howley | 0581 |
| S-01602 - Lorna Lennox | 0582 |
| S-01601 - Lisa Kenny | 0583 |
| S-01603 - Edel Flaherty | 0584 |
| S-01604 - Louise Ryan | 0585 |
| S-01605 - Maria Kearney | 0586 |
| S-01606 - Joseph Lacey | 0587 |
| S-01607 - Louise Doyle | 0588 |
| S-01608 - Rory Mulvaney | 0589 |
| S-01609 - Patrick Fagan | 0590 |
| S-01623 - Andrew McGouran | 0591 |
| S-01624 - Trish Navan | 0592 |
| S-01626 - Peter Foley | 0593 |
| S-01611 - Zoe Baker | 0594 |
| S-01627 - Michael Phillips | 0595 |
| S-01625 - David Harris | 0596 |
| S-01628 - Michelle McCormac | 0597 |
| S-01631 - Nicola Finn | 0598 |
| S-01629 - Sinead Doyle | 0599 |
| S-01632 - Paul Allen | 0600 |
| S-01630 - Stephen Wall | 0601 |
| S-01633 - Petra Vedres | 0602 |
| S-01634 - Philip Kearney | 0603 |
| S-01636 - Catherine Doyle | 0604 |
| S-01635 - Stephen Wall | 0605 |
| S-01637 - Gavin Daly | 0606 |
| S-01638 - Ronan Henderson | 0607 |
| S-01639 - Micheal O'Dea | 0608 |
| S-01640 - Thomas Fleming | 0609 |
| S-01649 - Philomena Myler | 0610 |

| | | |
|-----------------------------------|------|------------------|
| S-01650 - Rachel Neary | 0611 | |
| S-01651 - Rob McGee | 0612 | |
| S-01652 - Robert Giffney | 0613 | |
| S-01653 - Sharon Walsh | 0614 | |
| S-01654 - Sinead Corcoran | 0615 | |
| S-01655 - Siobhan Myler | 0616 | |
| S-01656 - Siobhan Ni Lainn | 0617 | |
| S-01657 - Susan Martin | 0618 | |
| S-01658 - Theresa Hyland | 0619 | |
| S-01659 - Therese Egan | 0620 | |
| S-01660 - Therese Pay | 0621 | |
| S-01661 - Thomas Crumlish | 0622 | |
| S-01662 - Tim Riordan | 0623 | |
| S-01663 - Dave Harbourne | 0624 | |
| S-01664 - Paul Daly Daly | 0625 | |
| S-01665 - Nelius Bresnan | 0626 | |
| S-01669 - Colm McCabe | 0627 | |
| S-01670 - Karena Hanly | 0628 | |
| S-01672 - Mark Godwin | 0629 | |
| S-01671 - Colm Jennings | 0630 | |
| S-01673 - Geraldine OConnor | 0631 | |
| S-01674 - Nicholas Polley | 0632 | 3D Design Bureau |
| S-01675 - William Hyland | 0633 | |
| S-01676 - Paul Jack | 0634 | |
| S-01677 - Patrick Murphy Gilligan | 0635 | |
| S-01678 - Vítor Oliveira | 0636 | |
| S-01679 - Patrick Fagan | 0637 | |
| S-01681 - Jennifer Whyms | 0638 | |
| S-01685 - Brian Treacy Treacy | 0639 | |
| S-01684 - David Hynes | 0640 | |
| S-01691 - Jennifer O'Toole | 0641 | |
| S-01686 - Rachel Keane | 0642 | |
| S-01692 - Aaron Nolan | 0643 | |
| S-01696 - Abbie La Cambre | 0644 | |
| S-01700 - Rory Byrne | 0645 | |
| S-01701 - Aiden O'Neill | 0646 | |
| S-01704 - Aisling Murphy | 0647 | |
| S-01707 - Andy Reilly | 0648 | |
| S-01708 - Adam Tallon | 0649 | |
| S-01709 - Angela Shafer | 0650 | |
| S-01711 - Dermot Tallon | 0651 | |
| S-01712 - Christopher Moran | 0652 | |
| S-01710 - Luke Conlan | 0653 | |
| S-01713 - Billy Brassil | 0654 | |

| | | |
|-----------------------------------|------|---------------------------------|
| S-01714 - enda Doyle | 0655 | |
| S-01715 - Gerard Conlan | 0656 | |
| S-01716 - Anita Conlan | 0657 | |
| S-01717 - Gauthier Gilbert | 0658 | |
| S-01718 - Luke Conlan | 0659 | |
| S-01719 - Alan Creaner | 0660 | |
| S-01722 - Alex Barry | 0661 | |
| S-01725 - Amelia Pollard | 0662 | |
| S-01728 - Angela O'Leary | 0663 | |
| S-01731 - Ann Doffe | 0664 | |
| S-01734 - David Coffey | 0665 | Tenters Residents Association |
| S-01735 - Ann Hedderman | 0666 | |
| S-01738 - Anna Pollard | 0667 | |
| S-01741 - Anne Creaner | 0668 | |
| S-01744 - Anne La Cambre | 0669 | |
| S-01747 - Anne Maher | 0670 | |
| S-01751 - Annette Flanagan | 0671 | |
| S-01754 - Annette Grehan | 0672 | |
| S-01757 - Principal Urban Planner | 0673 | Grangegorman Development Agency |
| S-01768 - Anthony Swortran | 0674 | |
| S-01771 - Aoife Broderick | 0675 | |
| S-01774 - B Walsh | 0676 | |
| S-01777 - Barry Cashin | 0677 | |
| S-01780 - Tara Spain | 0678 | TII |
| S-01781 - Bernard Ryan | 0679 | |
| S-01784 - Bill Kelly | 0680 | |
| S-01787 - James Sinton | 0681 | Cathedral Leisure Limited |
| S-01788 - Bill Logan | 0682 | |
| S-01791 - Breda Hayden | 0683 | |
| S-01794 - Brendan McGrath | 0684 | |
| S-01797 - Brian Baitson | 0685 | |
| S-01800 - Brian Pollard | 0686 | |
| S-01803 - Colm O'Shaughnessy | 0687 | |
| S-01804 - Brian Shanahan | 0688 | |
| S-01807 - Bridget Marl | 0689 | |
| S-01810 - Patrick Fagan | 0690 | |
| S-01811 - Lucas Spiro | 0691 | |
| S-01812 - Marie Gordon | 0692 | |
| S-01815 - Peter Lynn | 0693 | Hines Real Estate |
| S-01816 - Rita Carney | 0694 | |
| S-01817 - Callum Byrne | 0695 | |
| S-01820 - Caroline Grehan | 0696 | |
| S-01823 - Catherine Creighlin | 0697 | |

| | | |
|--|------|---------------------------------------|
| S-01826 - Fergal McAleavey | 0698 | |
| S-01827 - Catherine Feeney | 0699 | |
| S-01830 - anne kirby | 0700 | |
| S-01695 - Julian de Spáinn | 0701 | Conradh na Gaeilge |
| S-01831 - Celine Byrne | 0702 | |
| S-01834 - Claire Pollard | 0703 | |
| S-01838 - Claire Roe | 0704 | |
| S-01837 - miraim kilraine | 0705 | Griffith Court Residents Association |
| S-01841 - Colette O'Neill | 0706 | |
| S-01844 - Colin O'Shea | 0707 | |
| S-01847 - Orlaith Molloy | 0708 | |
| S-01848 - Damien Kelly | 0709 | |
| S-01854 - David Purdy | 0710 | |
| S-01857 - Deborah Fuller | 0711 | |
| S-01860 - Deirdre George | 0712 | |
| S-01302 - Mud Island Garden Community | 0713 | |
| S-01851 - Tom Grehan | 0714 | Ard Na Gréine Residents' Association |
| S-01863 - Derek Clarke | 0715 | |
| S-01866 - Derek Kane | 0716 | |
| S-01870 - Dermot O'Brien | 0717 | |
| S-01873 - Andrew O'Connell | 0718 | St. Teresa's Gardens Folklore Project |
| S-01875 - Patricia McElvaney/ O'Malley | 0719 | |
| S-01876 - Derrick Keller | 0720 | |
| S-01879 - Des Connolly | 0721 | |
| S-01883 - Gregor Toohey | 0722 | |
| S-01884 - Andrew O'Connell | 0723 | St. Teresa's Gardens Folklore Project |
| S-01885 - Seán Rafferty | 0724 | |
| S-01887 - Deirdre George | 0725 | |
| S-01886 - Andrew O'Connell | 0726 | St. Teresa's Gardens Folklore Project |
| S-01874 - Andrew O'Connell | 0727 | St. Teresa's Gardens Folklore Project |
| S-01882 - Andrew O'Connell | 0728 | St. Teresa's Gardens Folklore Project |
| S-01869 - Andrew O'Connell | 0729 | St. Teresa's Gardens Folklore Project |
| S-01890 - Eddie Nolan | 0730 | |
| S-01893 - Andrew O'Connell | 0731 | St. Teresa's Gardens Folklore Project |
| S-01894 - David Griffin | 0732 | |
| S-01895 - Eileen Carterl | 0733 | |

| | | |
|-----------------------------|------|---------------------------------------|
| S-01898 - Eileen Young | 0734 | |
| S-01902 - Eithne Logan | 0735 | |
| S-01901 - Simon Walsh | 0736 | |
| S-01905 - Miriam Murphy | 0737 | |
| S-01906 - Andrew O'Connell | 0738 | St. Teresa's Gardens Folklore Project |
| S-01907 - Aidan Tobin | 0739 | |
| S-01908 - Aidan Tobin | 0740 | |
| S-01910 - Tomás O'Mahony | 0741 | |
| S-01911 - Kevin O'Connell | 0742 | |
| S-01912 - Patrick Cosgrave | 0743 | |
| S-01913 - Amy Carey | 0744 | Solas Project |
| S-01914 - Vincent Hoban | 0745 | |
| S-01924 - Andrew O'Connell | 0746 | St. Teresa's Gardens Folklore Project |
| S-01925 - Andrew O'Connell | 0747 | St. Teresa's Gardens Folklore Project |
| S-01926 - Andrew O'Connell | 0748 | St. Teresa's Gardens Folklore Project |
| S-01927 - Andrew O'Connell | 0749 | St. Teresa's Gardens Folklore Project |
| S-01928 - Andrew O'Connell | 0750 | St. Teresa's Gardens Folklore Project |
| S-01931 - John Bregazzi | 0751 | |
| S-01932 - Irene Guilfoyle | 0752 | |
| S-01933 - Patrick Reid | 0753 | |
| S-01934 - Katri Laitinen | 0754 | |
| S-01935 - David Dickson | 0755 | |
| S-01936 - Eoin O Rourke | 0756 | |
| S-01937 - Sarah Fay | 0757 | |
| S-01939 - Aisling Ryan | 0758 | |
| S-01940 - James Corboy | 0759 | |
| S-01941 - Liz Bourke | 0760 | |
| S-01942 - Liz Bourke | 0761 | |
| S-01943 - Maria Maher | 0762 | |
| S-01944 - Patrick Farrell | 0763 | |
| S-01945 - don reilly | 0764 | |
| S-01946 - Liam Mulcahy | 0765 | Marino AFC |
| S-01947 - Margaret Sheridan | 0766 | |
| S-01948 - Emily McVicker | 0767 | |
| S-01950 - Elaine O'Neill | 0768 | |
| S-01953 - Ellen Shiels | 0769 | |
| S-01956 - Eoin Ffrench | 0770 | |
| S-01959 - Erica Purdy | 0771 | |

| | | |
|------------------------------------|------|---------------------------------------|
| S-01963 - Finn Barry | 0772 | |
| S-01962 - Caragh Hobbs | 0773 | |
| S-01966 - Caragh Hobbs | 0774 | |
| S-01967 - Karen McKeon | 0775 | |
| S-01968 - Fiona Nolan | 0776 | |
| S-01971 - Frances Hedderman | 0777 | |
| S-01974 - Frank La Cambre | 0778 | |
| S-01977 - Frank Ryan | 0779 | |
| S-01980 - G.B Gangin | 0780 | |
| S-01983 - Gareth Torner | 0781 | |
| S-01986 - Patrick O'Callaghan | 0782 | |
| S-01988 - Geoff Hankins | 0783 | |
| S-01987 - Anthony Sweeney | 0784 | |
| S-01991 - Georgia Barry | 0785 | |
| S-01994 - Gordon Walsh | 0786 | |
| S-01997 - Grace Pollard | 0787 | |
| S-02000 - Aidan Tobin | 0788 | |
| S-02001 - Helen Fleming | 0789 | |
| S-02004 - Patrick Naughton | 0790 | |
| S-02005 - Jackie Shiels | 0791 | |
| S-02008 - Jacqueline Judge | 0792 | |
| S-02011 - Jade McGrath | 0793 | |
| S-02014 - Jan Banks | 0794 | |
| S-02017 - Jane Shortall | 0795 | |
| S-02021 - Jennifer Anderson Keller | 0796 | |
| S-02020 - Andrew Dwyer | 0797 | |
| S-02027 - Jennifer Coleman | 0798 | |
| S-02025 - Mary Sorohan | 0799 | |
| S-02026 - Liam Sweeney | 0800 | |
| S-02024 - Annmarie Rogers | 0801 | |
| S-02032 - Jessica Kelly | 0802 | |
| S-02035 - Tom Magee | 0803 | Liberty Saints RFC |
| S-01929 - Jean Brophy | 0804 | |
| S-02031 - Zoe Obeimhen | 0805 | |
| S-02036 - Audrey Tunney | 0806 | |
| S-02037 - Zoe Obeimhen | 0807 | |
| S-02038 - Francis Lewis | 0808 | |
| S-02039 - Lydia Tunney | 0809 | |
| S-02040 - Andrew O'Connell | 0810 | St. Teresa's Gardens Folklore Project |
| S-02041 - Joseph Lewis | 0811 | |
| S-02046 - James McLaren | 0812 | |
| S-02053 - James Cosgrave | 0813 | |
| S-02050 - Sean Creed | 0814 | |
| S-02042 - Aine Caffrey | 0815 | |

| | | |
|-------------------------------|------|----------------------------------|
| S-02054 - Jim Harney | 0816 | |
| S-02057 - Joan Hegharty | 0817 | |
| S-02060 - Joanne Nolan | 0818 | |
| S-02068 - Joe Gorman | 0819 | |
| S-02072 - John Dunne | 0820 | |
| S-02067 - Patrick Fallon | 0821 | |
| S-02075 - John Flanagan | 0822 | |
| S-02063 - Eva Gahan | 0823 | Marino Resident Association |
| S-02071 - Aaron Cannon | 0824 | |
| S-02064 - Caitriona Nolan | 0825 | |
| S-02078 - AIDAN WHITE | 0826 | |
| S-02080 - Cathy Keating | 0827 | |
| S-02083 - Aideen Keenan | 0828 | |
| S-02084 - Brian McCann | 0829 | |
| S-01583 - Nessa Hill | 0830 | Neurodiversity Sandymount |
| S-02085 - John Gerard Carters | 0831 | |
| S-02088 - Deborah McCabe | 0832 | |
| S-02089 - John Hayden | 0833 | |
| S-02092 - William O'Donnell | 0834 | IN2 Engineering |
| S-02094 - John Kelly | 0835 | |
| S-02093 - David McCabe | 0836 | |
| S-02097 - John Miller | 0837 | |
| S-02100 - John Nolan | 0838 | |
| S-02103 - John Ryan | 0839 | |
| S-02106 - Jennifer Kearns | 0840 | |
| S-02107 - Joseph Maher | 0841 | |
| S-02110 - June Harney | 0842 | |
| S-02113 - Karen Byrne | 0843 | |
| S-02116 - Karen Purdy | 0844 | |
| S-02119 - Kathleen Dunne | 0845 | |
| S-02122 - Kieran Butler | 0846 | Esprit Investments Limited |
| S-02124 - Rosaleen Lewis | 0847 | |
| S-02045 - Gemma Dunbar | 0848 | |
| S-02123 - David Jennings | 0849 | |
| S-02125 - Enda Heery | 0850 | |
| S-02126 - Robert Dunbar | 0851 | |
| S-02127 - CATHAL O'CONNELL | 0852 | |
| S-02128 - Marie Sherlock | 0853 | |
| S-02082 - Geraldine Oliver | 0854 | Courtlands Residents Association |
| S-02131 - Kathleen Kavanagh | 0855 | |
| S-02134 - Philip Healy | 0856 | |
| S-02135 - Katie Maher | 0857 | |
| S-02138 - Keith Pollard | 0858 | |
| S-02141 - Kevin O'Hanlon | 0859 | |

| | | |
|------------------------------|------|--|
| S-02144 - Nuala Dormer | 0860 | |
| S-02145 - Killian Byrne | 0861 | |
| S-02148 - Kyle Croft | 0862 | |
| S-02151 - Laren Cashin | 0863 | |
| S-02154 - Clara Thornton | 0864 | |
| S-02155 - Leanne Barry | 0865 | |
| S-02161 - Grainne Behan | 0866 | |
| S-02158 - Leon Ryan | 0867 | |
| S-02162 - Liam Carte | 0868 | |
| S-02165 - Peter Bregazzi | 0869 | |
| S-02166 - Martin Grehan | 0870 | |
| S-02167 - Stuart Byrne | 0871 | |
| S-02168 - Joseph Smith | 0872 | |
| S-02169 - Nicholas Farrell | 0873 | |
| S-02172 - Harry McGee | 0874 | Ranelagh Gaels |
| S-02173 - Liam Worthington | 0875 | |
| S-02174 - David Meagher | 0876 | |
| S-02170 - Alan Bradshaw | 0877 | |
| S-02177 - Robert Bregazzi | 0878 | |
| S-02176 - Seán Heaslip Owens | 0879 | |
| S-02175 - Paris Jayan | 0880 | |
| S-02178 - James Noonan | 0881 | |
| S-02180 - Declan McCabe | 0882 | |
| S-02181 - Vincent Hennessy | 0883 | Kevins Hurling & Camogie Club |
| S-02182 - Vincent Hennessy | 0884 | |
| S-02184 - John Walsh | 0885 | |
| S-02183 - Quanta Capital | 0886 | Quanta Capital |
| S-02186 - Ciarán McGahon | 0887 | |
| S-02192 - Niall McElroy | 0888 | Sandymount and Merrion Residents Association |
| S-02079 - Rosa Stephens | 0889 | Dublin Community Growers |
| S-02191 - Therese McGlacken | 0890 | Department of Public Health, East |
| S-02194 - Declan Murphy | 0891 | |
| S-02195 - Christine Carroll | 0892 | |
| S-02197 - Raymond Martin | 0893 | MKN Property Group |
| S-02196 - Yvonne McCabe | 0894 | |
| S-02171 - Mícheál de Siún | 0895 | desiun architects |
| S-02198 - Valerie Driscoll | 0896 | |
| S-02200 - Carmel Doyle | 0897 | |
| S-02201 - Liam O'Loughlin | 0898 | |
| S-02204 - Linda Hand | 0899 | |
| S-02207 - Linda Sweeney | 0900 | |
| S-02210 - Lorraine Gorman | 0901 | |

| | | |
|----------------------------------|------|---|
| S-02213 - Lorraine Perkins | 0902 | |
| S-02216 - Lorraine Shiels | 0903 | |
| S-02219 - Caragh Keenan | 0904 | |
| S-02220 - Anthony Worthington | 0905 | |
| S-02221 - Cormac Dockry | 0906 | |
| S-02223 - IMELDA CONNOLLY | 0907 | |
| S-02224 - Angela Downes | 0908 | |
| S-02222 - colin mcgill | 0909 | |
| S-02225 - Alan Worthington | 0910 | |
| S-02228 - Maximilian Taucher | 0911 | |
| S-02226 - Adrienne Bermingham | 0912 | |
| S-02230 - Marie Carabini | 0913 | |
| S-02232 - Cathal Ryan | 0914 | |
| S-02233 - Karen Mc Donnell | 0915 | |
| S-02234 - Sarah Clarke | 0916 | |
| S-02231 - Sile Cotter | 0917 | |
| S-02235 - Jason Patrick Dunbar | 0918 | |
| S-02236 - David Fitzsimons | 0919 | |
| S-02237 - Patricia Slattery | 0920 | |
| S-02238 - Louise Lowry | 0921 | |
| S-02239 - gareth black | 0922 | |
| S-02240 - Stephanie Dickenson | 0923 | |
| S-02241 - Suzanne Cosentino | 0924 | |
| S-02242 - Rachel Power | 0925 | |
| S-02246 - Stephanie Dickenson | 0926 | |
| S-02248 - Fergal Mc Namara | 0927 | |
| S-02247 - Paul OBOYLE | 0928 | |
| S-02249 - Stephanie Dickenson | 0929 | |
| S-02245 - Brendan Heneghan | 0930 | |
| S-02250 - Brendan Heneghan | 0931 | |
| S-02252 - Shane Folan | 0932 | |
| S-02251 - Brendan Heneghan | 0933 | |
| S-02253 - Griffith Ave Residents | 0934 | Griffith Avenue and Districts Residents Association |
| S-02255 - Ronan Cluas | 0935 | |
| S-02254 - Ian Croft | 0936 | |
| S-02193 - Karen McKenna | 0937 | |
| S-02266 - Ellen Kinsella | 0938 | |
| S-02257 - Kevin Keane | 0939 | |
| S-02267 - Stephanie Dickenson | 0940 | |
| S-02268 - Louise La Cambre | 0941 | |
| S-02271 - Lucy O'Neill | 0942 | |
| S-02274 - Lynda McGrane | 0943 | |
| S-02277 - Stephanie Dickenson | 0944 | |
| S-02278 - M Pigott | 0945 | |

| | | |
|--|------|---------------------------|
| S-02284 - Michael O'Riordan | 0946 | |
| S-02286 - Philip Allard | 0947 | Wildstone Capital Limited |
| S-02283 - Emma Curran | 0948 | |
| S-02285 - Dr Yvonne Scannell | 0949 | |
| S-02288 - Simeon Rimmer | 0950 | |
| S-02291 - Mairead Maher | 0951 | |
| S-02294 - Marcella Higgins | 0952 | |
| S-02297 - Douglas Carson | 0953 | |
| S-02289 - Brendan Dunleavy | 0954 | |
| S-02298 - Margaret Broderick | 0955 | |
| S-02290 - Brian Bolger | 0956 | |
| S-02302 - Margaret Finegan | 0957 | |
| S-02306 - Marie Ryan | 0958 | |
| S-02309 - IMG Planning Limited IMG Planning Limited | 0959 | Donnybrook Hotel Limited |
| S-02310 - Jack O'Beirne | 0960 | Malkey Limited |
| S-02311 - Marion McKeever | 0961 | |
| S-02301 - Caitriona McArdle | 0962 | |
| S-02316 - Birkey Limited | 0963 | Birkey Limited |
| S-02314 - Caitriona McArdle | 0964 | |
| S-02317 - Mary Brennan | 0965 | |
| S-02320 - Mary Doyle | 0966 | |
| S-02323 - Mary More | 0967 | |
| S-02326 - Irish Life Assurance plc | 0968 | Irish Life Assurance plc |
| S-02327 - Carol Hyland | 0969 | Core Youth service |
| S-02328 - Kevin Tully | 0970 | Dublin Bus |
| S-02331 - James Murphy | 0971 | |
| S-02332 - Lorna Walsh | 0972 | |
| S-02342 - Thomas Crilly | 0973 | |
| S-02343 - Fran Trehly | 0974 | |
| S-02344 - Grainne Nolan | 0975 | |
| S-02348 - Deirdre Mc Evoy | 0976 | |
| S-02349 - Joseph Reilly | 0977 | |
| S-02350 - Noleen Reilly | 0978 | |
| S-02352 - Deborah Poole | 0979 | |
| S-02353 - Hilda Geraghty | 0980 | Segovia School Trust |
| S-02354 - Richard Duke | 0981 | |
| S-02355 - Thomas Gill | 0982 | |
| S-02356 - Noel Guinan | 0983 | |
| S-02358 - Mary Shortall | 0984 | |
| S-02361 - Mary Cass | 0985 | |
| S-02364 - Mavis Barry | 0986 | |
| S-02367 - Melvin Shiels | 0987 | |
| S-02370 - Michelle Connolly | 0988 | |
| S-02373 - Michelle Maxwell | 0989 | |

| | | |
|---|------|--|
| S-02376 - Monica Campwell | 0990 | |
| S-02379 - Niall Bailily | 0991 | |
| S-02382 - Noel Kane | 0992 | |
| S-02385 - Noyd Kaney | 0993 | |
| S-02388 - P Alliock | 0994 | |
| S-02391 - Paddy Shiels | 0995 | |
| S-02394 - Pamela La Cambre | 0996 | |
| S-02397 - Maureen McMahon | 0997 | Maryfield Aratne Residents Association |
| S-02398 - Pat Sheptall | 0998 | |
| S-02357 - Mary Gallagher | 0999 | |
| S-02401 - Patricia Kane | 1000 | |
| S-02404 - Claire Pettigrew | 1001 | |
| S-02406 - Laura Wynne | 1002 | |
| S-02407 - Declan White | 1003 | |
| S-02410 - John Savage | 1004 | RGRE Grafton Limited |
| S-02411 - Mashup Group Limited Autofulfill Limited | 1005 | Mashup Group Limited and Autofulfil Limited |
| S-02281 - Fiona Descoteaux | 1006 | Innovate Dublin Communities CLG |
| S-02408 - JJ O'Mahony | 1007 | |
| S-02412 - Neil Keogh | 1008 | Tennant & Ruttle Dist Ltd |
| S-02417 - Kate McDermott | 1009 | St Patrick's Athletic FC |
| S-02405 - Mary Gallagher | 1010 | |
| S-02418 - Amy Bramley | 1011 | Dublin Bus |
| S-02419 - mary Murray | 1012 | |
| S-02420 - Aaron Bux | 1013 | |
| S-02421 - Anna Howard | 1014 | Genvest ULC |
| S-02413 - Reg McCabe | 1015 | IWAI |
| S-02428 - Simon O'Leary | 1016 | |
| S-02422 - Anne O' Rourke | 1017 | |
| S-02431 - Eilis Humphreys | 1018 | Association of Patrons and Trustees of Catholic Schools |
| S-02432 - Susan Cummins | 1019 | |
| S-02433 - Niall O'Byrne | 1020 | Marlet Property Group Limited |
| S-02434 - David Murphy | 1021 | |
| S-02438 - Daragh Tracey | 1022 | |
| S-02439 - Daragh Tracey | 1023 | |
| S-02440 - Shane Fitzgerald | 1024 | |
| S-02282 - Kieran Doyle O'Brien | 1025 | |
| S-02441 - Laura Crowe | 1026 | |
| S-02442 - John Kelly | 1027 | |
| S-02329 - Patrick Fagan | 1028 | |

| | | |
|--|------|--|
| S-02445 - Clare Bannon | 1029 | Eastern and Midland Regional Assembly |
| S-02446 - Robert McCaffrey | 1030 | |
| S-04057 - Jamestown Industrial Centre and H G Ritchie & Co., Jamestown Road, Inchicore, Dublin 8 . | 1031 | Jamestown Industrial Centre and H G Ritchie & Co., Jamestown Road, Inchicore, Dublin 8 |
| S-02449 - Declan Maher | 1032 | |
| S-02450 - Peter Kearns | 1033 | Gordon Properties Limited |
| S-02448 - Louise Callaghan | 1034 | The Edmund Rice Schools Trust |
| S-02452 - Oliver Fegan | 1035 | |
| S-02444 - Paul Cullen | 1036 | |
| S-02451 - Yvonne Jackson | 1037 | Fáilte Ireland |
| S-02453 - Ivana Bacik | 1038 | |
| S-02454 - Pacelli Clancy | 1039 | |
| S-02465 - E to Infinity ICAV . | 1040 | E to Infinity ICAV |
| S-02466 - Paul Hand | 1041 | |
| S-02455 - Camgill Property a Tri Limited | 1042 | Camgill Property a Tri Limited |
| S-02469 - Paul MacKeoin | 1043 | |
| S-02472 - Paul O'Neill | 1044 | |
| S-02475 - Findlater House Ltd . | 1045 | Findlater House Ltd |
| S-02443 - Ross Keane | 1046 | Irish Film Institute |
| S-02476 - Pauline Hamilton | 1047 | |
| S-02490 - Niamh McDonlad | 1048 | Irish Water |
| S-02479 - Samir Eldin | 1049 | |
| S-02491 - Pearse Sutton | 1050 | |
| S-02430 - Ursula Barry | 1051 | |
| S-02480 - Peg Connolly | 1052 | |
| S-02498 - Gary Cooper | 1053 | Landmarque Property Group |
| S-02493 - Peter Houghney | 1054 | |
| S-02492 - Pat Farrell | 1055 | Irish Institutional Property |
| S-02496 - BCP Capital | 1056 | BCP Capital |
| S-02499 - BCP Capital | 1057 | BCP Capital |
| S-02500 - BCP Capital | 1058 | BCP Capital |
| S-02501 - McGarrell Reilly Group | 1059 | McGarrell Reilly Group |
| S-02497 - Religious Sisters of Charity Charity | 1060 | Religious Sisters of Charity |
| S-02502 - Troy Bannon | 1061 | Raidió Teilifís Éireann |
| S-01750 - Robert Olwill | 1062 | |
| S-02503 - Eimear Kelleher | 1063 | Arts Council |
| S-02504 - ALICE Foley | 1064 | |
| S-02507 - Lillian Wynne | 1065 | |
| S-02508 - Aisling O'Sullivan | 1066 | |

| | | |
|----------------------------|------|--------------------------------|
| S-02509 - Jamil Abubakar | 1067 | |
| S-02345 - Emer O'Siochru | 1068 | Ranelagh Arts Clg |
| S-02520 - Emma Daly | 1069 | |
| S-02521 - Sarabeth Deane | 1070 | |
| S-02522 - Gerard Conlan | 1071 | |
| S-02523 - Robert Yearl | 1072 | |
| S-02524 - Aoife Daly | 1073 | |
| S-02525 - Ian Bergin | 1074 | |
| S-02506 - Emma Flanagan | 1075 | Cairn PLC |
| S-02526 - Catherine Gorman | 1076 | |
| S-02527 - Thomas Gregg | 1077 | |
| S-02529 - Marian Smyth | 1078 | |
| S-02530 - Pat O'Sullivan | 1079 | Precision Construction Limited |
| S-02531 - Robert Quinn | 1080 | |
| S-02532 - Auveen O'Donnell | 1081 | |
| S-02533 - Aaron Doyle | 1082 | |
| S-02510 - Ralph McGarry | 1083 | |
| S-02534 - Damian Ryan | 1084 | |
| S-02535 - Damian Ryan | 1085 | |
| S-02536 - Damian Ryan | 1086 | |
| S-02537 - Damian Ryan | 1087 | |
| S-02538 - Lee Dillon | 1088 | |
| S-02540 - Ian O'Brien | 1089 | |
| S-02542 - Catherine Kelly | 1090 | |
| S-02544 - Austin Dunleavy | 1091 | |
| S-02543 - Ann Gallagher | 1092 | |
| S-02545 - Kathleen Redmond | 1093 | |
| S-02549 - Shane Fitzgibbon | 1094 | |
| S-02550 - Fiona Allen | 1095 | |
| S-02547 - Richard Cummins | 1096 | |
| S-02552 - Tara Canny | 1097 | |
| S-02553 - Dermot Sellars | 1098 | |
| S-02554 - Aileen Carr | 1099 | |
| S-02555 - Dana Braun | 1100 | |
| S-02557 - James Moody | 1101 | |
| S-02561 - Fr G Regan | 1102 | |
| S-02564 - Rose Cuthbert | 1103 | |
| S-02570 - Rebecca Clancy | 1104 | |
| S-02567 - Maura Butler | 1105 | |
| S-02571 - John Keogh | 1106 | |
| S-02574 - Gill Keogh | 1107 | |
| S-02577 - Graham Keogh | 1108 | |
| S-02560 - Garret McDermott | 1109 | |
| S-02584 - Margaret James | 1110 | |

| | | |
|-----------------------------------|------|------------------------------------|
| S-02587 - Darran O'Loughlin | 1111 | |
| S-02590 - Aoife O'Loughlin | 1112 | |
| S-02593 - Declan McDermott | 1113 | |
| S-02597 - David O'Brien | 1114 | |
| S-02596 - Natasha McAleese | 1115 | |
| S-02600 - Una Wall | 1116 | |
| S-02603 - Karen Barry | 1117 | |
| S-02606 - Dolores Ward | 1118 | |
| S-02556 - Niall Flynn | 1119 | |
| S-02435 - Alison Gilliland | 1120 | |
| S-02609 - Amber Dunne | 1121 | |
| S-02620 - christine Fitzpatrick | 1122 | |
| S-02610 - Dionne Berigan | 1123 | |
| S-02621 - Paul Hayes | 1124 | |
| S-02622 - Paul Cow | 1125 | |
| S-02625 - Lar Reilly | 1126 | |
| S-02628 - Robert Crawford | 1127 | |
| S-02631 - Ann Ryan | 1128 | |
| S-02634 - June O'Hara | 1129 | |
| S-02637 - Linda Kemple | 1130 | |
| S-02638 - Robert Bridget Costello | 1131 | |
| S-02641 - Jim Bradshaw | 1132 | |
| S-02644 - M O'Neill | 1133 | |
| S-02580 - Susan Scott | 1134 | |
| S-02647 - Tommy Shiels | 1135 | |
| S-02650 - Kayleigh Sugden | 1136 | |
| S-02611 - Andrew Keegan | 1137 | |
| S-02653 - Hollie Walsh | 1138 | |
| S-02656 - Francis O'Neill JNR | 1139 | |
| S-02659 - Jess Shiels | 1140 | |
| S-02662 - John Walsh | 1141 | |
| S-02665 - Pauline Farrell | 1142 | |
| S-02668 - Ciara O'Neill | 1143 | |
| S-02671 - Pamela Shiels | 1144 | |
| S-02674 - Kathleen Bartley | 1145 | |
| S-02675 - Charlie Swords | 1146 | |
| S-02678 - Amy Adams | 1147 | |
| S-02679 - Alan Downey | 1148 | |
| S-02676 - Stephen Holland | 1149 | |
| S-02677 - Sinead Kennedy | 1150 | |
| S-02030 - Joseph Gibbons | 1151 | |
| S-02681 - Clodagh Donovan | 1152 | |
| S-02682 - Robin Mandal | 1153 | Eglinton Residents' Association |
| S-02684 - Sean Walsh | 1154 | |

| | | |
|--|------|--------------------------------------|
| S-02683 - Sarah Buchanan | 1155 | Shandon Residents Association |
| S-02685 - Sarah Buchanan | 1156 | Shandon Residents Association |
| S-02686 - Sarah Buchanan | 1157 | Shandon Residents Association |
| S-02541 - John Kelly | 1158 | |
| S-02687 - Gareth O Hare | 1159 | |
| S-01121 - Brian Nolan | 1160 | |
| S-02048 - Rachel Cribbin | 1161 | |
| S-02688 - Geraldine Nolan | 1162 | |
| S-02047 - Rachel Cribbin | 1163 | |
| S-01610 - Laura Kelly | 1164 | |
| S-02680 - Grace O Malley | 1165 | |
| S-02690 - Clodagh Donovan | 1166 | |
| S-02691 - Adrian Martin | 1167 | |
| S-01170 - Darren Hall | 1168 | |
| S-02429 - Gina Sparks | 1169 | |
| S-02693 - Rhys Kenny | 1170 | |
| S-02698 - Phillip Connolly | 1171 | |
| S-02692 - Andrew Ryan | 1172 | |
| S-02702 - Rachel O'Shea | 1173 | |
| S-02705 - Reg George | 1174 | |
| S-02708 - Robert Arnold | 1175 | |
| S-02711 - All Hallows Area Association Drumcondra | 1176 | All Hallows Area Association |
| S-02713 - Robert Greene | 1177 | |
| S-02712 - Rachel Ryan | 1178 | |
| S-02701 - Zoe Obeimhen | 1179 | |
| S-02695 - Sofia Arkelid | 1180 | |
| S-02716 - Robert Hedderman | 1181 | |
| S-02719 - Robert Lafan | 1182 | |
| S-02447 - John McCullough | 1183 | |
| S-02722 - Ross Brady | 1184 | |
| S-02726 - Russ Hogan | 1185 | |
| S-02745 - Sandra Behan | 1186 | |
| S-01374 - Brendan Lynch | 1187 | |
| S-02748 - Sandra McGrath | 1188 | |
| S-02751 - Sarah Hedderman | 1189 | |
| S-02754 - Conn Darcy | 1190 | |
| S-01915 - Clare Bowe | 1191 | |
| S-02758 - Brian Kelly | 1192 | Templeogue Synge Street GFC |
| S-02725 - James O'Reilly | 1193 | Raglan Road Residents Planning Group |

| | | |
|-------------------------------|------|---------------------------|
| S-02759 - Niamh Kirwan | 1194 | |
| S-02694 - john flood | 1195 | |
| S-02762 - Scott La Cambre | 1196 | |
| S-02689 - Rachel Cribbin | 1197 | |
| S-02765 - Sean Barron | 1198 | |
| S-02768 - Sean Byrne | 1199 | |
| S-02771 - Sean Duignan | 1200 | |
| S-02483 - Simon Bailey | 1201 | |
| S-02774 - Sean Hegarty | 1202 | |
| S-02779 - Sean Maher | 1203 | |
| S-02185 - Annmarie Rogers | 1204 | |
| S-02778 - Ian Smith | 1205 | |
| S-02782 - Francis O Neill SNR | 1206 | |
| S-02761 - Siobhan Cuffe | 1207 | Pembroke Road Association |
| S-02785 - Maria Farrell | 1208 | |
| S-02777 - ronan cowley | 1209 | |
| S-02788 - Sean McKinney | 1210 | |
| S-02791 - Selina L | 1211 | |
| S-02760 - Ina Albrecht | 1212 | |
| S-02794 - Shay Purdy | 1213 | |
| S-02797 - David O'Rourke | 1214 | |
| S-02800 - Shirley Smith | 1215 | |
| S-02804 - Siobhan Meghorty | 1216 | |
| S-02801 - Brenda O'Rourke | 1217 | |
| S-02808 - Stephen Smith | 1218 | |
| S-02809 - Sophie Garnett | 1219 | |
| S-02812 - Larry O'Toole | 1220 | |
| S-02815 - Sophie Kelly | 1221 | |
| S-02818 - Paula Bowden | 1222 | |
| S-02820 - Stacey Gallagher | 1223 | |
| S-02823 - Stacy Redmond | 1224 | |
| S-02827 - M O'Driscoll | 1225 | |
| S-01682 - Garalt Canton | 1226 | |
| S-02830 - Stephen O'Reilly | 1227 | |
| S-02833 - J O'Driscoll | 1228 | |
| S-02836 - Sue Gary | 1229 | |
| S-02819 - Annmarie Rogers | 1230 | |
| S-02839 - Maria Doyle | 1231 | |
| S-02844 - Ellen O'Rourke | 1232 | |
| S-02847 - Toby O'Rourke | 1233 | |
| S-02850 - Edel Murray | 1234 | |
| S-02853 - Helena Cummins | 1235 | |
| S-02842 - Norah Mason | 1236 | |
| S-02856 - Tracy Clifford | 1237 | |

| | | |
|------------------------------|------|---|
| S-02456 - Rothar Velo | 1238 | Rothar |
| S-02859 - Ger M | 1239 | |
| S-02862 - Martina Levine | 1240 | |
| S-02843 - Fionnuala Halpin | 1241 | |
| S-02865 - Emma Duffy | 1242 | |
| S-02868 - Stephen Duffy | 1243 | |
| S-02872 - Peadar O'Leary | 1244 | |
| S-04142 - Margaret Mason | 1245 | |
| S-02875 - Kevin McKeown | 1246 | |
| S-02879 - Ronan O'Malley | 1247 | |
| S-02826 - Kay Ferriter | 1248 | |
| S-02757 - Eóin Flaherty | 1249 | |
| S-02880 - Graham Palmer | 1250 | |
| S-02883 - Karen O'Rourke | 1251 | |
| S-02886 - Paula O'Rourke | 1252 | |
| S-02889 - chrissie Cassisdy | 1253 | |
| S-02892 - Tanya O'Loughlin | 1254 | |
| S-02895 - Jennifer Murphy | 1255 | |
| S-02898 - Monica Murphy | 1256 | |
| S-02904 - Chelsea Murphy | 1257 | |
| S-02903 - George Keogh | 1258 | |
| S-02907 - Nicholas Murphy | 1259 | |
| S-02910 - Enid Curry | 1260 | |
| S-02913 - Aimee Curry | 1261 | |
| S-02917 - Martin Carney | 1262 | |
| S-02916 - Cllr Marie Devine | 1263 | |
| S-02871 - Oisin Benson | 1264 | Social Democrats Dublin Bay South Branch |
| S-02920 - Niall Parsons | 1265 | |
| S-02878 - Aidan McNamara | 1266 | |
| S-02924 - Laura Reid | 1267 | |
| S-02923 - Cllr Marie Devine | 1268 | |
| S-02928 - Christine Reid | 1269 | |
| S-02931 - Mark Timmins | 1270 | |
| S-02927 - Leila Young | 1271 | |
| S-02901 - Celine Leonard | 1272 | |
| S-02936 - Conor Broderick | 1273 | |
| S-02934 - David Byrne | 1274 | |
| S-02939 - David Donnelly | 1275 | |
| S-02941 - Maria Broderick | 1276 | |
| S-02944 - Marie Des Hickey | 1277 | |
| S-04058 - Deirdre Flood | 1278 | |
| S-01160 - Ronan Evers-Norton | 1279 | |
| S-02949 - Carol Timmins | 1280 | |
| S-02940 - Gerard Fitzsimons | 1281 | |

| | | |
|---|------|---|
| S-02953 - Kate Cummins | 1282 | |
| S-02935 - Leo Kilkenny | 1283 | |
| S-01909 - Dermot Donnelly | 1284 | |
| S-02956 - Kieran Mahon | 1285 | |
| S-02952 - Kevin Cassidy | 1286 | |
| S-02963 - Brenda Mahon | 1287 | |
| S-02966 - Nicola Mc Donnell | 1288 | |
| S-02967 - Hollie Forde | 1289 | |
| S-01699 - Brian Pluymen | 1290 | |
| S-02970 - Lauren Forde | 1291 | |
| S-02947 - donna O'Keeffe | 1292 | |
| S-02959 - Sean Creed | 1293 | |
| S-02973 - Christopher O'Loughlin | 1294 | |
| S-02948 - Madeleine Phelan | 1295 | |
| S-02976 - Denise Kearns | 1296 | |
| S-02979 - Evelyn O'Loughlin | 1297 | |
| S-02982 - Killian O'Sullivan | 1298 | |
| S-02962 - Eileen McKenna | 1299 | |
| S-02986 - Jane Ferry | 1300 | |
| S-02987 - Eve Dunbar | 1301 | |
| S-02988 - John Mitchell | 1302 | DMOD Architects |
| S-02989 - Dylan Dunbar | 1303 | |
| S-02999 - Amy Brosnahan | 1304 | |
| S-02985 - Siobhan Hamand | 1305 | |
| S-01178 - Ciara McManus | 1306 | |
| S-02990 - Nora Trench Bowles | 1307 | |
| S-03000 - John Mernock | 1308 | |
| S-03003 - Patrick Lansley | 1309 | |
| S-03005 - Darragh Moriarty | 1310 | |
| S-03015 - Dillon Brady | 1311 | |
| S-03013 - Joe Stack | 1312 | |
| S-03016 - Declan Butler | 1313 | |
| S-03017 - Niamh Doolan | 1314 | |
| S-03018 - Declan Butler | 1315 | |
| S-03020 - Lisa O'Brien | 1316 | |
| S-03021 - James Savage | 1317 | |
| S-03019 - Frances Dockery | 1318 | |
| S-03022 - Eoin Nolan | 1319 | |
| S-03024 - sarah Coyle | 1320 | Irish Life Assurance plc |
| S-03023 - John Fingleton | 1321 | |
| S-01680 - Ann Marie Keegan | 1322 | |
| S-03026 - Maryfield Artane Residents' Association residents | 1323 | Maryfield Artane Residents' Association |
| S-03004 - Larry Dowling | 1324 | |
| S-03038 - Helen Keegan | 1325 | |

| | | |
|-------------------------------|------|----------------------------------|
| S-03039 - Kenny Carroll | 1326 | Workers' Party Dublin Central |
| S-03040 - Garrett Greene | 1327 | |
| S-03042 - Aoife Farrelly | 1328 | |
| S-03043 - Dave O'Hara | 1329 | |
| S-02229 - Shane Herron | 1330 | |
| S-03045 - Luke Foley | 1331 | |
| S-03046 - Liz Dawson | 1332 | |
| S-03047 - Elaine Brehony | 1333 | |
| S-03034 - Ken Dempsey | 1334 | |
| S-03044 - Jack Nolan | 1335 | |
| S-03051 - Barry Gibson | 1336 | |
| S-02902 - Kay Ferriter | 1337 | |
| S-02528 - Triona Byrne | 1338 | |
| S-03053 - Arlene Hetherington | 1339 | |
| S-03055 - Neil Curry | 1340 | |
| S-03054 - Cormac O'Dwyer | 1341 | |
| S-03056 - Shane Brehony | 1342 | |
| S-03014 - Brian Lenehan | 1343 | |
| S-03057 - Connor Hillman | 1344 | |
| S-03062 - John Dunne | 1345 | |
| S-03065 - Wes Dillon | 1346 | |
| S-03064 - Tom Buyckx | 1347 | |
| S-03063 - thomas murphy | 1348 | |
| S-03066 - Stephen Lawless | 1349 | |
| S-03067 - JAMES REDMOND | 1350 | |
| S-03072 - Claire Downey | 1351 | |
| S-03073 - Conor Fallon | 1352 | |
| S-02333 - Liam Dwan | 1353 | LOKRA |
| S-03074 - Kathy Van den bosch | 1354 | |
| S-03075 - Evan Bourke | 1355 | |
| S-03077 - Shane Carty | 1356 | |
| S-03078 - Kate Doyle | 1357 | |
| S-03001 - John B. Reid | 1358 | |
| S-03048 - Anthony Corbet | 1359 | |
| S-03079 - Laura Conroy | 1360 | |
| S-03080 - Adam Leonard | 1361 | |
| S-03076 - Julianne McEvoy | 1362 | |
| S-03052 - Anthony Corbet | 1363 | |
| S-03083 - Dean Murray | 1364 | |
| S-03081 - Conor Kelly | 1365 | |
| S-03085 - Ciaran Dolan | 1366 | |
| S-03086 - Mark Power | 1367 | |
| S-03087 - Carla Newman | 1368 | |
| S-03090 - Devin Synnott | 1369 | |

| | | |
|---|------|---|
| S-03035 - Angela Deegan | 1370 | |
| S-03082 - Marcus Rochford | 1371 | |
| S-03097 - Matthew O'Leary | 1372 | |
| S-03088 - Patrick Flynn | 1373 | |
| S-03098 - Ryan Nolan | 1374 | |
| S-03092 - Ben McEvatt | 1375 | |
| S-03102 - Lisa Keegan | 1376 | |
| S-03091 - Andrew Arlovski | 1377 | |
| S-03099 - Kevin Byrne | 1378 | South Georgian Core Residents Association |
| S-03103 - Anthony O'Toole | 1379 | |
| S-03071 - JAMES REDMOND | 1380 | |
| S-03110 - Cian Malone | 1381 | |
| S-03101 - Oliver Foreman | 1382 | |
| S-03104 - Jeremy Ryan | 1383 | |
| S-03112 - Killian Burgess | 1384 | |
| S-03100 - Ken Dempsey | 1385 | |
| S-01388 - Sebastian Vencken | 1386 | Broadstone Together |
| S-03111 - Pauline Foster | 1387 | Metro South West Group |
| S-03114 - Leo Hennessey | 1388 | |
| S-03115 - Zoe Obeimhen | 1389 | |
| S-02130 - Patrick Owens | 1390 | |
| S-03124 - Suzanne Wallace | 1391 | |
| S-03125 - Lauren Dillon | 1392 | |
| S-03126 - 2 residents | 1393 | |
| S-03113 - Catherine Mc Sweeney | 1394 | |
| S-03089 - Aga Szot | 1395 | |
| S-03127 - Doyle Kent Ltd Kent | 1396 | Doyle Kent Ltd. |
| S-03116 - Kevin Byrne | 1397 | South Georgian Core Residents Association |
| S-03084 - Aga Szot | 1398 | |
| S-03130 - Mark Kelly | 1399 | |
| S-03131 - Angela Downes | 1400 | |
| S-03132 - Aine Greene | 1401 | |
| S-03133 - Gillian McDermott | 1402 | |
| S-03136 - Tadhg Shalloo | 1403 | |
| S-03137 - Nuada Mac Eoin | 1404 | |
| S-03138 - Michelle O'Callaghan O'Callaghan | 1405 | |
| S-02729 - Colm Healy | 1406 | Dublin Bay South Green Party |
| S-03140 - Cian McElhinney | 1407 | |
| S-03139 - Melinda Lyons | 1408 | Dublin Naturalists' Field Club |
| S-03141 - Susan McKinney | 1409 | |

| | | |
|------------------------------------|------|--------------------------------------|
| S-03155 - T Walsh | 1410 | |
| S-03178 - Terri K | 1411 | |
| S-03181 - Killeen Properties | 1412 | Killeen Properties |
| S-03177 - Frank Masterson | 1413 | CIE |
| S-03182 - Tillie Byrne | 1414 | |
| S-02305 - Simon Clear | 1415 | Simon Clear & Associates |
| S-03185 - Noel McDermott | 1416 | |
| S-03187 - Tom Aherne | 1417 | |
| S-03186 - Amanda Martyn | 1418 | |
| S-02330 - T M | 1419 | Sporting Liberties |
| S-03167 - katia papkovskaia | 1420 | |
| S-03172 - Freda Keeshan | 1421 | Bayview Avenue Residents Association |
| S-03195 - Tom Grehan | 1422 | |
| S-03194 - MCR Consortium Ltd. | 1423 | MCR Consortium Limited |
| S-03198 - Dave Sihra | 1424 | |
| S-03200 - Vennea Byrne | 1425 | |
| S-03193 - Paul O'Rourke | 1426 | Shelbourne AFC |
| S-03192 - Brendan Heneghan | 1427 | |
| S-03206 - Shelbourne SSC FC | 1428 | Shelbourne SSC FC |
| S-03203 - Vera Redmond | 1429 | |
| S-03199 - Paul Crowe | 1430 | |
| S-03207 - Vernon Boyd | 1431 | |
| S-01195 - Con Keohane | 1432 | |
| S-03212 - Mary O'Rourke | 1433 | |
| S-03211 - Frances Mitchell | 1434 | |
| S-03213 - Liam Anthony Boyce | 1435 | |
| S-03210 - Andrew Montague | 1436 | |
| S-03214 - Edita and Roman Sleidan | 1437 | |
| S-03218 - Neasa Hourigan | 1438 | |
| S-03231 - Francis and Martin Walsh | 1439 | |
| S-03230 - Donna Ryan | 1440 | Downey Planning |
| S-03229 - Keith Mc Quillan | 1441 | |
| S-03238 - Clúid Housing | 1442 | Clúid Housing Association |
| S-03239 - John and Brodie Moody | 1443 | |
| S-03242 - Orla Duffy | 1444 | |
| S-03237 - Andrew Montague | 1445 | |
| S-03217 - Michael McKenna | 1446 | |
| S-03255 - Aisling McNamara | 1447 | |
| S-03243 - Eamonn O'Reilly | 1448 | Dublin Port Company |
| S-03256 - dominic kearney | 1449 | St James Hospital, Dublin 8 |
| S-03259 - Kate T | 1450 | |
| S-03262 - David Tyrrell | 1451 | |
| S-03266 - Giustina Mizzoni | 1452 | |
| S-03258 - Andrew Montague | 1453 | |

| | | |
|---|------|---------------------------------------|
| S-03257 - Justin Marden | 1454 | Spacerepublica Pty Ltd |
| S-03268 - Anna Beer | 1455 | DWS Grundbesitz GmbH |
| S-00799 - Donal McEvoy | 1456 | |
| S-03264 - Barta Bartra | 1457 | Bartra Capital |
| S-03263 - Karl Twomey | 1458 | |
| S-03270 - Paul Kavanagh | 1459 | |
| S-03272 - Jimmy Scurry | 1460 | |
| S-04143 - Neasa Hourigan | 1461 | |
| S-03286 - Sue Belcher | 1462 | |
| S-03278 - Stephanie Dickenson | 1463 | |
| S-03287 - Gary Gill | 1464 | |
| S-03288 - Stephanie Dickenson | 1465 | |
| S-03291 - Mette Hansen | 1466 | CHQ Building Ltd. |
| S-03277 - Deborah Cullinan | 1467 | Mesh Architects |
| S-03293 - Karen Murphy | 1468 | Irish Council for Social Housing |
| S-03289 - Annmarie Rogers | 1469 | |
| S-02807 - Annmarie Rogers | 1470 | |
| S-03313 - Cian Hade | 1471 | |
| S-03279 - Tim Lynch | 1472 | |
| S-03322 - Stephen Keogh | 1473 | Frank Keohane Building Surveyor |
| S-03321 - Stephanie Dickenson | 1474 | |
| S-03284 - Eugene Gilligan | 1475 | |
| S-03234 - Eddie Bryce | 1476 | |
| S-03269 - Rebecca Mullin | 1477 | Office of Public Works |
| S-03328 - Deirdre Byrne | 1478 | |
| S-03295 - Caroline Flynn | 1479 | |
| S-03329 - Rebecca Mullin | 1480 | Office of Public Works |
| S-03330 - John Mahon | 1481 | |
| S-03314 - Austin Campbell | 1482 | Robert Emmet CDP |
| S-03235 - Perer Smyth | 1483 | |
| S-03331 - Peter Oates | 1484 | |
| S-03327 - Stephanie Dickenson | 1485 | |
| S-03337 - Jack Clarke | 1486 | |
| S-03341 - Eric Rafferty | 1487 | |
| S-03292 - Conor Gavin | 1488 | |
| S-03336 - Paddy Gray | 1489 | Circle K Ireland Energy Group Limited |
| S-03326 - Cian Burgess | 1490 | |
| S-03342 - Ulrika Forsberg | 1491 | |
| S-03338 - Jerome Casey | 1492 | Chapelizod Residents Association |
| S-03312 - Quintain Developments Ireland Limited | 1493 | Quintain Developments Ireland Limited |

| | | |
|--|------|--|
| S-03340 - Gary Meyler | 1494 | |
| S-03339 - Natalie Walsh | 1495 | City Architects, Dublin City Council |
| S-03344 - Sinead Carava | 1496 | |
| S-03352 - Joseph Clarke | 1497 | |
| S-03353 - Patricia Smith | 1498 | |
| S-03345 - Paddy Gray | 1499 | Circle K Ireland Energy Group Limited |
| S-03355 - Garrett O'Doherty | 1500 | |
| S-03323 - David O'Sullivan | 1501 | Balmoral Land Beresford Limited |
| S-03356 - RCB Dublin | 1502 | RCB |
| S-03359 - United States of America | 1503 | United States of America represented by the U.S Embassy Dublin |
| S-03265 - Catherine Mc Sweeney | 1504 | |
| S-03228 - Derek McDonald | 1505 | |
| S-03362 - Paddy Gray | 1506 | Circle K Ireland Energy Group Limited |
| S-03366 - Róisín Shortall | 1507 | |
| S-03358 - Cian O Byrne | 1508 | |
| S-03068 - Community Gardens Ireland | 1509 | Community Gardens Ireland |
| S-03372 - Paddy Gray | 1510 | Circle K Ireland Energy Group Limited |
| S-03365 - Jerome Casey | 1511 | Chapelizod Residents Association |
| S-03369 - Geraldine Alexander | 1512 | |
| S-03363 - Leslie Fitzpatrick | 1513 | Ravenshire Ltd. |
| S-03376 - Julie Costello | 1514 | Maxol Ltd |
| S-03381 - Paddy Gray | 1515 | Circle K Ireland Energy Group Limited |
| S-03384 - The Congregation of Christian Brothers . | 1516 | The Congregation of Christian Brothers |
| S-03361 - Conor Lynch | 1517 | |
| S-03382 - Caoimhe Darcy | 1518 | |
| S-03367 - James Madigan | 1519 | Liberties Cultural Association |
| S-03389 - Paddy Gray | 1520 | Circle K Ireland Energy Group Limited |
| S-03383 - Martin Stonehouse | 1521 | Marlet Property Group |
| S-03386 - Julie Costello | 1522 | Maxol Ltd |
| S-03346 - Martina Mullin | 1523 | Trinity College Dublin |
| S-03368 - Brendan Malone | 1524 | |
| S-03373 - Liam and Teresa Cashe | 1525 | |

| | | |
|---|------|--|
| S-03403 - Paddy Gray | 1526 | Circle K Ireland Energy Group Limited |
| S-03364 - Alannah O'Reilly | 1527 | |
| S-03404 - Culann Walsh | 1528 | |
| S-03320 - Rachel Surman | 1529 | |
| S-03371 - Simon Nugent | 1530 | Upper Leesson Street Area Residents Association (ULSARA) |
| S-03401 - Daniel Kavanagh | 1531 | |
| S-03378 - amanda waite | 1532 | |
| S-03402 - Patrick Dunne | 1533 | |
| S-03290 - Stephen Matthews | 1534 | |
| S-03407 - Nora and Michael Talbot | 1535 | |
| S-03380 - Dermot Clancy | 1536 | Richmond Homes |
| S-03379 - Geraldine Merrick | 1537 | |
| S-03405 - Mary Fallon | 1538 | |
| S-03410 - Paddy Gray | 1539 | Circle K Ireland Energy Group Limited |
| S-03400 - Shaun Thorpe | 1540 | Marlet Property Group |
| S-03190 - Alan Robinson | 1541 | Docklands Business Forum |
| S-03418 - Paddy and Marie Smith | 1542 | |
| S-03254 - Simon Nugent | 1543 | Upper Leesson Street Area Residents Association (ULSARA) |
| S-03354 - Grelis Ltd | 1544 | Grelis Ltd |
| S-03357 - Edan Keenan | 1545 | |
| S-03422 - Paddy Gray | 1546 | Circle K Ireland Energy Group Limited |
| S-03406 - Ken Lyons | 1547 | |
| S-03424 - Terry Merrick | 1548 | |
| S-03411 - Geraldine Clements Clements | 1549 | |
| S-03425 - Cllr. Tina MacVeigh | 1550 | |
| S-03421 - Gavin Staunton | 1551 | |
| S-03423 - Eilish O'Carroll | 1552 | Back of the Pipes Residents Association |
| S-03296 - Tony Kelly | 1553 | District 7 Community Alliance |
| S-03325 - Sian Cunningham | 1554 | Crash Ensemble |
| S-03413 - On Behalf Of Adults Attending CRC | 1555 | CRC Adult Representatives |
| S-03432 - Abby Renehan | 1556 | |
| S-03391 - Catherine Lane | 1557 | |
| S-03437 - Paddy Gray | 1558 | Circle K Ireland Energy Group Limited |
| S-03427 - Iapetus LP. | 1559 | Iapetus LP. |

| | | |
|--|------|--|
| S-03434 - Michael Lavelle | 1560 | |
| S-03429 - Shane Farnham | 1561 | |
| S-03433 - Peter Murray | 1562 | |
| S-03431 - Gerard Menezes | 1563 | |
| S-03428 - patrick wolohan | 1564 | |
| S-03390 - Caroline Molloy | 1565 | Santry Community Assoc CLG |
| S-03439 - The Lotus Group | 1566 | The Lotus Group |
| S-00930 - Paul Watts | 1567 | |
| S-03435 - silvana benedetto | 1568 | |
| S-03446 - Laura Keegan | 1569 | |
| S-03430 - Audrey Plunkett | 1570 | |
| S-03285 - Toal Ó Muiré | 1571 | |
| S-03412 - Willie White | 1572 | Dublin Theatre Festival |
| S-03438 - Joe Mulligan | 1573 | Office of the Director of Public Prosecutions |
| S-03456 - Donnchadh O'Neill | 1574 | |
| S-03454 - John Lynch | 1575 | |
| S-03447 - Austin Campbell | 1576 | Community Organisations and residents Network (CORN) |
| S-03459 - silvana benedetto | 1577 | |
| S-03426 - Alex Curtis | 1578 | |
| S-03440 - Peter McCarthy | 1579 | |
| S-03468 - Robert Gleeson | 1580 | |
| S-03467 - Glenavy Educational Foundation CLG | 1581 | Glenavy Educational Founation CLG |
| S-03469 - Philip and Rachele McBride | 1582 | |
| S-04545 - COLM TOBIN | 1583 | |
| S-03464 - James Madigan | 1584 | Liberties Cultural Association |
| S-03453 - Sinead O'Leary | 1585 | |
| S-03473 - Ekaterina Glavatkaia | 1586 | |
| S-03474 - Paula Hicks | 1587 | |
| S-03236 - Aoife Rooney | 1588 | |
| S-03475 - Stephen Mulvany | 1589 | Dublin City University |
| S-03360 - Robbie Kitt | 1590 | |
| S-03455 - Cllr Marie Devine | 1591 | |
| S-03457 - Padraig Owens | 1592 | Jamestown Village Ltd. |
| S-03466 - Stephanie Dickenson | 1593 | |
| S-03333 - Elizabeth Bryan | 1594 | |
| S-03479 - Niamh Coburn | 1595 | |
| S-03458 - Theresa Mallon | 1596 | |
| S-03482 - Alan Kelly | 1597 | |
| S-03478 - Donal McLarnon | 1598 | |
| S-03477 - Karen Marconi | 1599 | |

| | | |
|----------------------------------|------|---------------------------------------|
| S-03481 - Oliver Mangan | 1600 | CLONTRAF GAA CLUB |
| S-03465 - Paddy Gray | 1601 | Circle K Ireland Energy Group Limited |
| S-03480 - Caroline Molloy | 1602 | Santry Community Assoc CLG |
| S-03483 - Hazel Jones | 1603 | Bartra Capital Property |
| S-03476 - Cllr Marie Devine | 1604 | |
| S-03487 - Ray Cunningham | 1605 | |
| S-03488 - John McKeon | 1606 | Sycamore (Park Lane) Management CLG |
| S-03484 - James Madigan | 1607 | Liberties Cultural Association |
| S-03496 - Neva Elliott | 1608 | Music Alliance Ireland |
| S-03494 - Tracy Crossan | 1609 | |
| S-03493 - Moa Hogarth Pender | 1610 | |
| S-03497 - John McKeown | 1611 | POPPYHILL LTD AND MKN INVESTMENTS LTD |
| S-03489 - Ray Cunningham | 1612 | |
| S-03491 - Mary Corbally Corbally | 1613 | |
| S-03495 - Rory Burke | 1614 | JV Tierney and Company |
| S-03499 - Padraig Kehoe | 1615 | Development 8 |
| S-03501 - Colin Roden | 1616 | |
| S-03502 - laura brannigan | 1617 | |
| S-03500 - Ray Cunningham | 1618 | |
| S-03504 - Padraig Kehoe | 1619 | Development 8 |
| S-03273 - Matthew Melis | 1620 | |
| S-03492 - Cllr Marie Devine | 1621 | |
| S-03507 - Hazel Jones | 1622 | Bartra Property Broombridge Limited |
| S-03520 - Donal O'Keefe | 1623 | Licensed Vintners Association (LVA) |
| S-03506 - Ray Cunningham | 1624 | |
| S-03332 - David Boles | 1625 | |
| S-03522 - Ray Cunningham | 1626 | |
| S-03490 - Lisa Kenny | 1627 | |
| S-03526 - Lisa Kenny | 1628 | |
| S-03521 - Hazel Jones | 1629 | Bartra Property Broombridge Limited |
| S-03524 - Tadhg Spain | 1630 | |
| S-03505 - Gavin Behan | 1631 | |
| S-03535 - Leona Dowdall | 1632 | |
| S-03510 - Paschal Nee | 1633 | |
| S-03541 - Hazel Jones | 1634 | Bartra Property Broombridge Limited |
| S-03525 - Ray Cunningham | 1635 | |
| S-03542 - Aurora Aleson | 1636 | |

| | | |
|---|------|--------------------------------|
| S-03548 - Maryam Ali | 1637 | |
| S-03545 - Fergus O'Farrell | 1638 | |
| S-03523 - Ivanna Chovgan | 1639 | South West Inner City Network |
| S-03539 - Aislinn O'Brien | 1640 | |
| S-03560 - Reilly Lands 2012 SVP Ltd. Reilly Lands 2012 SVP Ltd. | 1641 | |
| S-03549 - Sam Moore | 1642 | |
| S-03546 - Michael Stein | 1643 | |
| S-03565 - Andrew Arlovski | 1644 | |
| S-03553 - Tony O' Rourke | 1645 | Usher Celtic |
| S-03567 - Mardown Ltd. | 1646 | Cunnane Stratton Reynolds |
| S-03563 - U+I Group PLC | 1647 | U+I Group PLC |
| S-03576 - Atria V Lux SARL | 1648 | Atria V Lux SARL |
| S-03562 - Dave Bruen | 1649 | |
| S-03566 - Tribeach Dublin | 1650 | Tribeach Dublin Ltd (Tribeach) |
| S-03579 - Kylesmore Road Landowners | 1651 | McGill Planning Ltd. |
| S-03577 - Laura Crowe | 1652 | Tom Phillips + Associates |
| S-03578 - Conor Kenny | 1653 | Clancourt Group |
| S-03561 - Kieran Doyle O'Brien | 1654 | |
| S-03544 - O'Flynn Group | 1655 | O'Flynn Group (OFG) |
| S-03592 - Tom Phillips | 1656 | |
| S-03581 - amanda waite | 1657 | |
| S-01054 - Conor Harte | 1658 | |
| S-03593 - Alice Tevlin | 1659 | |
| S-03596 - Nicholas Corson | 1660 | MOTOR DISTRIBUTORS LTD |
| S-03591 - Sam Moore | 1661 | Tenters Residents Association |
| S-03595 - Susan Fogarty | 1662 | NAMA |
| S-03597 - Tom Phillips | 1663 | |
| S-03605 - Stephen and Ann Griffin | 1664 | |
| S-03602 - Lauren Forde | 1665 | |
| S-03388 - An Post | 1666 | Avison Young |
| S-03601 - FINGLAS EMPLOYER GROUP | 1667 | FINGLAS EMPLOYER GROUP |
| S-03538 - Anna Livia | 1668 | Dublin is Dying |
| S-03508 - Georgina Moore | 1669 | I Love St. Anne's |
| S-01082 - K. Murphy | 1670 | |
| S-01083 - K. Murphy | 1671 | |
| S-03608 - Carmel Sherry | 1672 | |
| S-03498 - Paul Delaney | 1673 | Cellnex Telecom Ireland |
| S-03603 - Karin O'Flanagan | 1674 | Mountjoy Square Society |
| S-03615 - Tom Phillips | 1675 | |
| S-03134 - Ross Elwood | 1676 | Dott |
| S-03617 - Dee Kerins | 1677 | |

| | | |
|---|------|---|
| S-03622 - Valerie Driscoll | 1678 | |
| S-03460 - David Gosling | 1679 | |
| S-03551 - Ella Tighe | 1680 | |
| S-03629 - Harley Issuer DAC | 1681 | Harley Issuer DAC |
| S-03569 - Kathleen White | 1682 | South Inner City Community Development Association (SICCDA) |
| S-01048 - David Vaughan | 1683 | Richmond Road and Grace Park Avenue Residents Association |
| S-03619 - James Maguire | 1684 | |
| S-03648 - Alex Driscoll | 1685 | |
| S-03632 - Síne Kelly | 1686 | Mater Private Hospital |
| S-03650 - The Abbey Theatre Amharclann na Mainistreach | 1687 | The Abbey Theatre Amharclann na Mainistreach |
| S-03628 - Kenneth Killeen | 1688 | Improvised Music Company |
| S-03620 - amanda waite | 1689 | |
| S-03631 - Chris Caldwell | 1690 | |
| S-03652 - John McKenna | 1691 | |
| S-03630 - Tom Phillips | 1692 | |
| S-03661 - John Corri | 1693 | |
| S-03651 - David Howard | 1694 | Property Industry Ireland |
| S-03324 - John Killeen | 1695 | |
| S-03343 - Stephen Plunkett | 1696 | |
| S-04067 - James Benson | 1697 | Irish Home Builders Association (IHBA), a constituent association of the Construction Industry Federation (CIF) |
| S-04059 - Declan O'Brien | 1698 | Temple Bar Residents |
| S-03662 - Tilly Driscoll Smith | 1699 | |
| S-03609 - Gayle Cullen | 1700 | OLiver Bond Residents Group |
| S-03598 - Donough Cahill | 1701 | Irish Georgian Society |
| S-03664 - Tom Phillips | 1702 | |
| S-03666 - Conor Sheehan | 1703 | |
| S-03634 - Ella Tighe | 1704 | |
| S-03580 - Linda D'Arcy | 1705 | |
| S-03665 - Mark Cullen | 1706 | Pallas Projects |
| S-03667 - Lorcan Keegan | 1707 | |
| S-01666 - Míde Power | 1708 | Not Here Not Anywhere |
| S-03559 - Lucy Magee | 1709 | |
| S-04074 - Construction Workers' Pension Scheme Trustees DAC Construction Workers' Pension Scheme Trustees DAC | 1710 | Construction Workers' Pension Scheme Trustees DAC |

| | | |
|---|------|--|
| S-03618 - Caroline Molloy Molloy | 1711 | |
| S-03671 - Shaun Thorpe | 1712 | St. Clare's GP3 Ltd |
| | | Richmond Road and Grace Park Avenue Residents Association |
| S-03672 - David Vaughan | 1713 | |
| S-03128 - Donna Ryan | 1714 | Downey Planning |
| S-03674 - John McKenna | 1715 | |
| S-03673 - Hussain Wanas | 1716 | |
| | | Cumann Luthcleas Gael Coiste Átha Cliath (Dublin GAA County Board) |
| S-03564 - Jim Brogan | 1717 | |
| S-03682 - Elizabeth Keegan | 1718 | |
| S-03676 - Donna Ryan | 1719 | Downey Planning |
| | | Pembroke Estates Management Ltd |
| S-03668 - Nicholas Corson | 1720 | |
| S-03267 - Edwina Governey | 1721 | Hibernia REIT plc |
| S-03594 - Eoghan Kidney | 1722 | |
| S-03670 - Desmond Dennehy | 1723 | Percolt Limited |
| S-03684 - Glenda Connolly | 1724 | |
| S-03623 - K. Murphy | 1725 | |
| S-03509 - Maebh Kinsella | 1726 | |
| S-03568 - Cllr Patricia Roe | 1727 | |
| S-03686 - Glen Jenkins | 1728 | BOC Gases |
| S-03677 - Dublin Central General Partnership | 1729 | Dublin Central General Partnership |
| S-03436 - Nell Spillane | 1730 | |
| S-03683 - Paul Nolan | 1731 | |
| S-03503 - Tomas Bradley | 1732 | EirGrid Group plc |
| S-03144 - Ciara Franck | 1733 | |
| S-03692 - Peter McKenna | 1734 | Kennedy Wilson |
| | | Development Applications unit |
| S-03694 - Connor Rooney | 1735 | |
| S-03703 - Steve Cassidy | 1736 | Sandford Living Limited |
| S-03633 - Hennie Kallmeyer | 1737 | Declan Brassil & Co. Ltd. |
| S-03702 - Mike Clark | 1738 | Trinity College Dublin |
| S-03649 - Tracey Foran | 1739 | |
| S-03704 - John Savage | 1740 | Ronan Group Real Estate |
| S-03707 - The Irish Province of the Order of the Carmelites . | 1741 | The Irish Province of the Order of Carmelites |
| S-03695 - Jeff Behan | 1742 | |
| | | Phizzfest Reimagining Phibsborough |
| S-03697 - Anne Phelan | 1743 | |
| S-03687 - Gavin Lyons | 1744 | |
| S-03715 - hugh kelly | 1745 | St Francis Hospice |
| S-03696 - Edan Keenan | 1746 | |

| | | |
|---|------|---|
| S-03675 - Killian Redmond | 1747 | |
| S-03723 - Ste Mull | 1748 | |
| S-03718 - Colm Cummins | 1749 | Electricity Supply Board |
| S-03709 - Eddie Keogh | 1750 | Oliver Bond Celtic |
| S-03717 - Antoin Doyle | 1751 | |
| S-03721 - Kaleriya Dudina | 1752 | |
| S-03722 - Una Lowry | 1753 | Dolphin House CDA |
| S-03708 - Síne Kelly | 1754 | Whitbread |
| S-03158 - Aoife McArdle | 1755 | |
| S-03731 - Simeon Smith | 1756 | Masamba Samba School |
| S-03705 - Teresa Hackett | 1757 | Grand Canal Dock Residents Association |
| S-03663 - Gill O'Callaghan | 1758 | |
| S-03733 - Aodhan King | 1759 | |
| S-03736 - Christy Dowling | 1760 | EWR Innovation Park Ltd |
| S-03732 - CorporateSupport Unit | 1761 | Department of Environment, Climate and Communications |
| S-03738 - phil Mulvaney | 1762 | TU Dublin |
| S-03741 - Sinead O'Leary | 1763 | |
| S-03734 - Joe Costello | 1764 | Stoneybatter Pride of Place |
| S-03720 - Seán McCabe | 1765 | |
| S-03725 - Audrey Fitzsimons | 1766 | |
| S-03726 - Róisín O'Neill | 1767 | Instinctif Partners |
| S-03719 - Alannah Kidney | 1768 | |
| S-03742 - Geraldine Maher | 1769 | Department of Transport |
| S-03747 - Peter Lynn | 1770 | Hines Real Estate |
| S-03751 - Westridge Real Estate . | 1771 | Westridge Real Estate |
| S-03191 - Niall O'Byrne | 1772 | Land Development Agency |
| S-03753 - Ballymore Group | 1773 | Ballymore |
| S-03745 - Uniphar Group Plc | 1774 | Uniphar Group Plc |
| S-03691 - Hines Real Estate Ireland Limited | 1775 | Hines Real Estate Ireland Limited (HREIL) |
| S-03746 - Gill O'Callaghan | 1776 | |
| S-03756 - Barry McCrea | 1777 | |
| S-02081 - Ciara Magee | 1778 | |
| S-03685 - Sophie Meehan | 1779 | |
| S-03754 - Zoe Obeimhen | 1780 | |
| S-03775 - Dublin Diocese Dublin Diocese | 1781 | Brock McClure on behalf of Dublin Diocese |
| S-03536 - Peter Kable | 1782 | OnlineArchitect |
| S-03757 - James Leonard | 1783 | Castlethorn Construction |
| S-03764 - Diageo Ireland | 1784 | Diageo Ireland |
| S-03093 - Emer Costello | 1785 | |
| S-03759 - Ellen Cullen | 1786 | Dublin Cycling Campaign |

| | | |
|---------------------------------------|------|--|
| S-03385 - Rebecca Ray | 1787 | |
| S-03790 - Karin O'Flanagan | 1788 | Mountjoy Square Society |
| S-03616 - Joan Carmichael | 1789 | |
| S-03792 - Anne Henry | 1790 | |
| S-03793 - Sinead O'Leary | 1791 | |
| S-03774 - Elaine Donnelly | 1792 | |
| S-03716 - jamila ali | 1793 | |
| S-03748 - amanda waite | 1794 | Dublin 8 Ladies Club |
| S-03787 - Tom Costello | 1795 | IPUT plc |
| S-03737 - Bríd Smith | 1796 | Bríd Smith TD, People Before Profit |
| S-03794 - pranash ramanundh | 1797 | RIAI |
| S-03760 - Maeve Gavin | 1798 | |
| S-03797 - Aidan Sweeney | 1799 | Ibec |
| S-03739 - Cllr Deirdre Heney | 1800 | |
| S-03789 - Gavin Staunton | 1801 | |
| S-03798 - Marian Flynn | 1802 | |
| S-03801 - Eoghan O'Mara Walsh | 1803 | ITIC |
| S-03796 - Rory Walsh | 1804 | BPG3 |
| S-03804 - Sinead O'Leary | 1805 | |
| S-03803 - Patrick Kirby | 1806 | |
| S-03669 - Eimear Shaughnessy | 1807 | |
| S-03808 - Ballymore Group | 1808 | Ballymore |
| S-01186 - Declan o'brien | 1809 | |
| S-03812 - Joe Costello Declan Meenagh | 1810 | Dublin Central Labour Party |
| S-03807 - Deirdre Nichol | 1811 | Clontarf Residents' Association |
| S-03743 - Patricia O'Connell | 1812 | |
| S-03744 - Anne O'NEILL | 1813 | |
| S-03806 - Mícheál Ó Nualláin | 1814 | Baile Átha Cliath le Gaeilge |
| S-03755 - Patrick Fagan | 1815 | |
| S-03813 - Ballymore Group | 1816 | Ballymore |
| S-03815 - Seán Woods | 1817 | Office of the Planning Regulator |
| S-03809 - An Taisce Dublin City | 1818 | an Taisce |
| S-03786 - Bernadette Kiely | 1819 | Berkeley Road Area Residents Association |
| S-03693 - Sheena Barry | 1820 | |
| S-03819 - David Clements | 1821 | NTA |
| S-03802 - Stuart Scott | 1822 | |
| S-03472 - Alexander Mordaunt | 1823 | |
| S-03543 - Catherine Mc Sweeney | 1824 | |
| S-03814 - Ronan Lyons | 1825 | |
| S-03776 - Paula Russell | 1826 | Harold's Cross Village Community Council |

| | | |
|-------------------------------------|------|--|
| S-03795 - David Caffrey | 1827 | Glenveagh Properties |
| S-03832 - Bernadette Kiely | 1828 | Berkeley Road Area Residents Association |
| S-03762 - ANITA DEEGAN | 1829 | TERENURE WEST RESIDENTS' ASSOCIATION |
| S-03816 - Peadar O'Grady | 1830 | |
| S-03763 - Anne Cooper | 1831 | |
| S-03260 - Emer Ni Dhuill | 1832 | Natural Capital Ireland |
| S-03752 - Colm Bodkin | 1833 | |
| S-03582 - Colm O'Callaghan | 1834 | American Chamber of Commerce Ireland |
| S-03834 - Bernadette Kiely | 1835 | Berkeley Road Area Residents Association |
| S-03817 - Patricia O'Connell | 1836 | |
| S-03791 - Aaron Foley | 1837 | |
| S-03822 - Edward Crean | 1838 | National Disability Authority |
| S-03820 - Frank Foley | 1839 | |
| S-03831 - Rob Curley | 1840 | |
| S-03841 - Donna Ryan | 1841 | Downey Planning |
| S-03818 - Áine Ní Shúilleabháin | 1842 | |
| S-03058 - Claire Wheeler | 1843 | |
| S-03842 - Bernadette Kiely | 1844 | Berkeley Road Area Residents Association |
| S-03833 - Grace O'Duffy | 1845 | |
| S-03761 - Kenneth Gavin | 1846 | |
| S-03843 - Alma Rowan | 1847 | |
| S-03740 - Gary Mackin | 1848 | |
| S-03835 - Patricia Ryan | 1849 | The Dynamic Drimnagh Forum |
| S-02256 - Claire Downey | 1850 | Rediscovery Centre |
| S-03527 - Lorcan Lyons | 1851 | |
| S-03847 - Bernadette Kiely | 1852 | Berkeley Road Area Residents Association |
| S-03706 - M. Chambers | 1853 | |
| S-03851 - Cllr. Tina MacVeigh | 1854 | |
| S-03624 - Gráinne Shaffrey Shaffrey | 1855 | |
| S-03821 - Chris Power-Smith | 1856 | |
| S-03811 - Laura McGuigan | 1857 | Gaiety Theatre UC |
| S-03839 - Fiona Campbell | 1858 | Codling Wind Park Ltd |
| S-03852 - Bernadette Kiely | 1859 | Berkeley Road Area Residents Association |
| S-03855 - Laura McGuigan | 1860 | Gaiety Theatre UC |
| S-03846 - Denis Devane | 1861 | Wind Energy Ireland |
| S-03849 - Caoimhín Ó Cadhla | 1862 | |

| | | |
|------------------------------|------|---|
| S-03853 - hugh kelly | 1863 | Green Land Capital - Tom Phillips Associates |
| S-03129 - Lisa Kilbride | 1864 | Community Education Group, DALC |
| S-03845 - Michael McCarthy | 1865 | Cloud Infrastructure Ireland |
| S-03861 - Bernadette Kiely | 1866 | Berkeley Road Area Residents Association |
| S-03854 - Clodagh Donovan | 1867 | |
| S-03805 - Cllr Deirdre Heney | 1868 | |
| S-03850 - Anne O'NEILL | 1869 | |
| S-03653 - Peter Keenahan | 1870 | |
| S-03862 - Niall O Baoill | 1871 | The Inchicore Railway Works / Residents Association |
| S-03829 - Alan Hanlon | 1872 | Department of Education |
| S-03844 - Sean Lynch | 1873 | |
| S-03824 - Rea Lavelle | 1874 | |
| S-03727 - A. Mac Eoin. | 1875 | |
| S-03863 - Eoin QUinn | 1876 | IHF |
| S-03856 - Brendan Rankin | 1877 | |
| S-03724 - Ahmed Hameedi | 1878 | |
| S-03865 - Ken Buckmaster | 1879 | |
| S-03830 - Finbarr Kelly | 1880 | |
| S-03864 - Bernadette Kiely | 1881 | Berkeley Road Area Residents Association |
| S-03857 - Aoife Nic Philibin | 1882 | |
| S-03848 - Brian McDermott | 1883 | |
| S-03654 - Rob Tobin | 1884 | NCBI Possibility Lab |
| S-03866 - james Norton | 1885 | |
| S-03867 - Vera Hackett | 1886 | |
| S-03868 - Margaret Fagan | 1887 | |
| S-03869 - A O'Grady | 1888 | |
| S-03872 - Aaron Laidagin | 1889 | |
| S-03875 - Aeoin Cynes | 1890 | |
| S-03878 - Aidan Surlis | 1891 | |
| S-03881 - Robbie Sinnott | 1892 | Voice of Vision Impairment |
| S-03885 - Cllr Mary Freehill | 1893 | |
| S-03887 - Ian Maguire | 1894 | Clontarf Golf Club |
| S-03888 - Anne Bassett | 1895 | |
| S-03889 - Elaine Treacy | 1896 | Maryfield Artane Residents Association |
| S-03890 - Ailish Gilroy | 1897 | |
| S-03893 - Aisling Heapes | 1898 | |
| S-03896 - Alan Doyle | 1899 | |
| S-03899 - Anne Griffin | 1900 | |
| S-03902 - Anne Malone | 1901 | |

| | |
|-----------------------------|------|
| S-03905 - Anthony O'Rourke | 1902 |
| S-03908 - Audrey Boyle | 1903 |
| S-03911 - Beatrice Mihoe | 1904 |
| S-03914 - Benny McLougall | 1905 |
| S-03917 - Brendan Dawson | 1906 |
| S-03920 - Brian Malone | 1907 |
| S-03923 - Caroline Hampson | 1908 |
| S-03926 - Christy O'Neill | 1909 |
| S-03929 - Ciara Crowe | 1910 |
| S-03932 - Ciara Murphy | 1911 |
| S-03935 - Ciaran McElroy | 1912 |
| S-03938 - Clodna Gilroy | 1913 |
| S-03941 - Colm O'Le | 1914 |
| S-03944 - Conor Hampson | 1915 |
| S-03947 - D David | 1916 |
| S-03950 - Damen Kelly | 1917 |
| S-03953 - Darren Dowling | 1918 |
| S-03956 - David Gilroy | 1919 |
| S-03959 - Michael Concarr | 1920 |
| S-03962 - Margaret Quinn | 1921 |
| S-03965 - Robert Forde | 1922 |
| S-03968 - Edel Robert Forde | 1923 |
| S-03971 - Martin Turner | 1924 |
| S-03974 - Jackie Turner | 1925 |
| S-03977 - Margaret Hanlon | 1926 |
| S-03980 - Philip Keogh | 1927 |
| S-03983 - A McHenry | 1928 |
| S-03986 - Andrew Kiernan | 1929 |
| S-03989 - Ann Concarr | 1930 |
| S-03992 - Andrew Hennigan | 1931 |
| S-03995 - Bernie Kelly | 1932 |
| S-03998 - Ben Travers | 1933 |
| S-04001 - R Bradshaw | 1934 |
| S-04004 - D Bradshaw | 1935 |
| S-04007 - Danny Gill | 1936 |
| S-04010 - David Concarr | 1937 |
| S-04013 - David Hennigan | 1938 |
| S-04016 - Dermot Taggart | 1939 |
| S-04026 - David Whyte | 1940 |
| S-04075 - Deirdre Fines | 1941 |
| S-04078 - Dolans Dawson | 1942 |
| S-04081 - Donald McGrath | 1943 |
| S-04084 - Donna Hession | 1944 |
| S-04087 - Eamonn Furey | 1945 |

| | | |
|------------------------------------|------|---|
| S-04090 - Amy Hastings | 1946 | Architectural Consultants Limited |
| S-04091 - Docklands Business Forum | 1947 | Docklands Business Forum |
| S-04092 - Patrick Grant | 1948 | |
| S-04093 - Edward and Susan Devitt | 1949 | |
| S-04096 - Eileen Malone | 1950 | |
| S-04099 - Elaine O'Hanlon | 1951 | |
| S-04102 - Gary McKinney | 1952 | |
| S-04105 - Gaye Crowley | 1953 | |
| S-04108 - Geraldine Whyte | 1954 | |
| S-04111 - Grainne Corey | 1955 | |
| S-04114 - Helena Bland | 1956 | |
| S-04117 - Hugh O'Hara | 1957 | |
| S-04120 - Ian Crowe | 1958 | |
| S-04128 - Cllr Joe Costello | 1959 | |
| S-04123 - Dean Sullivan | 1960 | Health Service Executive |
| | | Rathgar Residents Association |
| S-04135 - Sue Millar | 1961 | |
| S-04144 - Isla Gilroy | 1962 | |
| S-04147 - Jack Malone | 1963 | |
| S-04150 - James Fennell | 1964 | |
| S-04153 - Jeanette O'Brien | 1965 | |
| S-04156 - Jennifer Williams | 1966 | |
| S-04159 - Jenny O'Brien | 1967 | |
| S-04162 - Joan Mihoe | 1968 | |
| S-04165 - Joe Murphy | 1969 | |
| S-04168 - Joel Hetley | 1970 | |
| S-04171 - Pauline Cadell | 1971 | BLEND Residents Association |
| S-04179 - Geraldine Walsh | 1972 | Dublin Civic Trust |
| | | Inchicore Regeneration Consultative Forum |
| S-04185 - Eamon Devoy | 1973 | |
| S-04196 - John Conroy | 1974 | |
| S-04199 - John Heapes | 1975 | |
| S-04202 - John Malone | 1976 | |
| S-04205 - Joseph Forbes | 1977 | |
| S-04208 - Julie McArthur | 1978 | |
| S-04211 - Karina Duhoe | 1979 | |
| S-04214 - Kellie Hampson | 1980 | |
| S-04217 - Kevin Keogh | 1981 | |
| S-04220 - Laureen Fennell | 1982 | |
| S-04223 - Lee Hampson | 1983 | |
| S-04226 - Liam Byrne | 1984 | |
| S-04229 - Linda Hayden | 1985 | |
| S-04232 - Mark O'Hara | 1986 | |
| S-04235 - Linda Ugurlu | 1987 | |

| | |
|-----------------------------|------|
| S-04238 - Margaret O'Rourke | 1988 |
| S-04241 - Maria Mihoe | 1989 |
| S-04244 - Mariann Heapes | 1990 |
| S-04247 - Martina McGrat | 1991 |
| S-04250 - Maura Byrne | 1992 |
| S-04253 - Megan Hampson | 1993 |
| S-04256 - Michael Bruton | 1994 |
| S-04259 - Monica Collins | 1995 |
| S-04262 - Natasha Keyes | 1996 |
| S-04265 - Neville Bryan | 1997 |
| S-04268 - Niamh Malone | 1998 |
| S-04271 - Nicola Dempsey | 1999 |
| S-04274 - Nora Fay | 2000 |
| S-04277 - Oisin Gilroy | 2001 |
| S-04280 - A. Ward | 2003 |
| S-04281 - Aaron Coleman | 2004 |
| S-04282 - Adrianna Keenan | 2005 |
| S-04283 - Aidan Collins | 2006 |
| S-04284 - Aidan Duffy | 2007 |
| S-04285 - Patricia Keyes | 2008 |
| S-04288 - Patrick Forbes | 2009 |
| S-04291 - Paul Ringwood | 2010 |
| S-04294 - Peggy Surlis | 2011 |
| S-04297 - Peter Hearnese | 2012 |
| S-04300 - Peter O'Rourke | 2013 |
| S-04303 - Philip Foley | 2014 |
| S-04306 - Phyllis Eiffe | 2015 |
| S-04309 - Rachel O'Shea | 2016 |
| S-04312 - Raj Arya | 2017 |
| S-04315 - Ray McNully | 2018 |
| S-04318 - Richard Williams | 2019 |
| S-04321 - Sean Carroll | 2020 |
| S-04324 - Sean Crowe | 2021 |
| S-04327 - Sheena Ringwood | 2022 |
| S-04330 - Sheila O'Hara | 2023 |
| S-04333 - Siobhan McKinney | 2024 |
| S-04336 - Stephen Crowley | 2025 |
| S-04339 - Thomas Dempsey | 2026 |
| S-04342 - Tim Collins | 2027 |
| S-04345 - Tina Forbes | 2028 |
| S-04348 - Tracey Jones | 2029 |
| S-04351 - Treasa Aunaole | 2030 |
| S-04354 - Vernon Boyd | 2031 |
| S-04357 - Veronica Bennett | 2032 |

| | | |
|---|------|------------------------|
| S-04360 - Veronica Walsh | 2033 | |
| S-04363 - William McBryan | 2034 | |
| S-04366 - Ying Lou | 2035 | |
| S-04369 - Adam Currivan | 2036 | |
| S-04370 - Ahannagh Dempsey | 2037 | |
| S-04371 - Alan Osborne | 2038 | |
| S-04372 - Alex Connolly | 2039 | |
| S-04373 - Anna Mann | 2040 | |
| S-04374 - Benny Donnelly | 2041 | |
| S-04375 - Bobby Byrne | 2042 | |
| S-04376 - Bobby Cudden | 2043 | |
| S-04377 - Caleb Dempsey | 2044 | |
| S-04378 - Carmel Bradley | 2045 | |
| S-04379 - Caroline Kealy | 2046 | |
| S-04380 - Caroline Murphy | 2047 | |
| S-04381 - Christy Quigley | 2048 | |
| S-04382 - Colette Carroll | 2049 | |
| S-04383 - Colm McGennis | 2050 | |
| S-04384 - Conall Owen | 2051 | |
| S-04385 - Daniel Fitzpatrick | 2052 | |
| S-04386 - Tolka Park Postal Submissions 31 | 2053 | |
| S-04387 - The Corpus Christi Postal Submissions 300 | 2054 | |
| S-04388 - The Corpus Christi Parochial Hall Postal Upload 334 | 2055 | |
| S-04389 - Tadag O'Cruaotlaoich | 2056 | |
| S-04390 - Barbara Mackinnan | 2057 | |
| S-04391 - Mary and Richard Treacy | 2058 | |
| S-04392 - Tony McNally | 2059 | |
| S-04393 - Kate Nolan | 2060 | |
| S-04394 - Ciaran Beary | 2061 | |
| S-04395 - Ard Na Greine Estate Postal Upload 66 | 2062 | |
| S-04398 - Dynamic Drimnagh Forum | 2063 | Dynamic Drimnagh Forum |
| S-04399 - Tolka Park Postal Submissions 115 | 2064 | |
| S-04400 - June and Caroline Maloney | 2065 | |
| S-04401 - Ann and John Nevin | 2066 | |
| S-04402 - Des Barrett | 2067 | |
| S-04403 - John Deegan | 2068 | |
| S-04404 - Josephine Devlin | 2069 | |
| S-04405 - Annemarie Schmuki | 2070 | |
| S-04407 - Orlaith and Pat Hassett | 2071 | |
| S-04451 - John Nolan | 2072 | Santry Forum |
| S-04408 - Gerry Murtagh | 2073 | |

| | | |
|---|------|---|
| S-04409 - Patrick Murtagh | 2074 | |
| S-04410 - Betty Murtagh | 2075 | |
| S-04411 - Kevin Murtagh | 2076 | |
| S-04412 - Mr and Mrs O'Neill | 2077 | |
| S-04415 - The Corpus Christi Postal Submissions 170 | 2078 | |
| S-04416 - Marrowbone Lane Postal Upload 88 | 2079 | |
| S-04418 - Tolka Park Postal Submissions 326 | 2080 | |
| S-04419 - Tolka Park Postal Submissions 340 | 2081 | |
| S-04420 - East Point Management CLG | 2082 | Earlsfort East Point and East Point Development (Two) Ltd |
| S-04421 - Savona Limited | 2083 | Savona Limited |
| S-04422 - John D'Arcy | 2084 | The Educena Foundation |
| S-04424 - James Wrynn | 2085 | Ranelagh Village Improvement Group |
| S-04429 - Odran Reid and Others | 2086 | |
| S-04430 - Dublin Town | 2087 | Dublin Town |
| S-04439 - Tolka Park Postal Submissions 300 | 2088 | |
| S-04440 - Santry Lands- Shanowen Road Postal Submissions 4 | 2089 | |
| S-04441 - Santry Lands- Shanowen Road Postal Submissions 13 | 2090 | |
| S-04442 - Santry Lands- Shanowen Road Postal Submissions 11 | 2091 | |
| S-04443 - Santry Lands- Shanowen Road Postal Submissions 5 | 2092 | |
| S-04444 - Arthur Molloy | 2093 | Molloy Sherry (Eirfreeze) Ltd |
| S-04445 - Ruadhan MacEoin | 2094 | |
| S-04446 - Fergus Sharpe | 2095 | |
| S-04447 - Paul McAuliffe | 2096 | |
| S-04448 - Noel Ahern | 2097 | Ierne Social and Sports Club |
| S-04449 - Maria Tobin | 2098 | |
| S-04450 - Fiona Glevin | 2099 | |
| S-04455 - Margaret Moran | 2100 | |
| S-04456 - Tony Corcoran | 2101 | |
| S-04457 - Chriona O'Sullivan | 2102 | |
| S-04458 - Aviva Life and Pensions Ireland DAC | 2103 | Aviva Life and Pensions Ireland DAC |
| S-04460 - Blossombrook Ltd | 2104 | Blossombrook Ltd |
| S-04462 - Coombe Lying-in Hospital | 2105 | Coombe Lying-in Hospital |
| S-04464 - Dalton Brokers | 2106 | Dalton Brokers |

| | | |
|---|------|--|
| S-04465 - Tolka Park Postal Submissions 89 | 2107 | |
| S-04466 - Michael Waddell | 2108 | |
| S-04546 - Philip O'Reilly | 2109 | |
| S-04467 - Amy Hastings | 2110 | Architectural Consultants Limited |
| S-04468 - Earlsfort East Point and East Point Development (Two) Ltd and others | 2111 | Earlsfort East Point and East Point Development (Two) Ltd and others |
| S-04475 - Frank Geary | 2112 | Irish Development Education Association |
| S-04477 - rob McGlanaghy | 2113 | |
| S-04478 - James Dunne | 2114 | Irish Rail |
| S-04479 - Sinead Kerins | 2115 | |
| S-04480 - Pauline Foster | 2116 | Recorders Resident Association |
| S-04481 - Rachel Condon | 2117 | McCutcheon Halley |
| S-04482 - Maeve Foreman | 2118 | |
| S-04484 - Ciaran Cuffe | 2119 | |
| S-04485 - Aoife Hannan | 2120 | Kilmainham Inchicore Network |
| S-04503 - Alice Mary Higgins | 2121 | |
| S-04512 - Sunil Sharpe | 2122 | Give Us The Night |
| S-04513 - Breda and Larry McCarthy | 2123 | |
| S-04514 - Royal Dublin Society | 2124 | Royal Dublin Society |
| S-04515 - Maire Churchill | 2125 | |
| S-04516 - Lorna Kelly | 2126 | |
| S-04517 - Marion Cashman and Others | 2127 | Dublin Democratic Planning Alliance |
| S-04522 - Irene Guia | 2128 | Handmaids of the Sacred Heart of Jesus |
| S-04524 - Marion Masterson | 2129 | Richview Residents Association |
| S-04547 - Piere Waland | 2130 | |
| S-04535 - Aine Clancy | 2131 | |
| S-04536 - Ben Dunne | 2132 | |
| S-04539 - Charlotte Sheridan and Kevin Woods | 2133 | |
| S-04542 - Eugene Carlyle | 2134 | |
| S-04538 - Philip O'Reilly | 2135 | |
| S-04537 - Philip O'Reilly | 2136 | |
| S-04543 - Jackie Malone | 2137 | |
| S-04544 - Lillian Buchasan | 2138 | |
| S-04548 - Frank McDonald | 2139 | |
| S-04560 - Frank Ryan | 2140 | |

| | | |
|------------------------------|------|------------------------------|
| S-04561 - Frank Ryan | 2141 | |
| S-04562 - Sean McCormack | 2142 | |
| S-04563 - Sean McCormack | 2143 | |
| S-04564 - Odran Reid | 2144 | TU Dublin |
| S-04571 - Rosaleen Lally | 2145 | Irish Wheelchair Association |
| S-04572 - Catherine McGuigan | 2146 | Age Friendly Ireland |
| S-04573 - Máirín Ó Cuireáin | 2147 | Waterways Ireland |