



# Naas Road Lands Local Area Plan



Adopted January 2013





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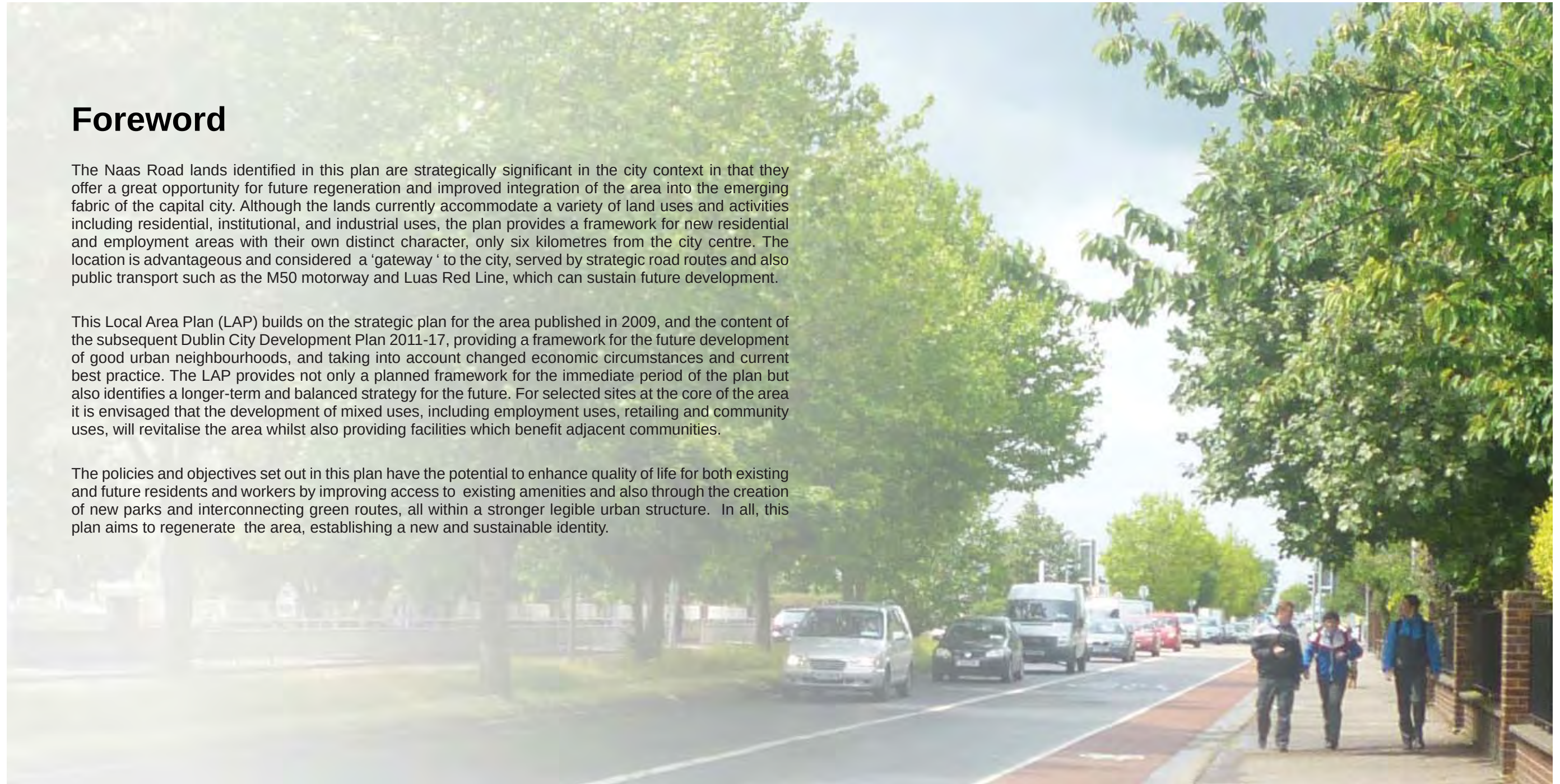


## Foreword

The Naas Road lands identified in this plan are strategically significant in the city context in that they offer a great opportunity for future regeneration and improved integration of the area into the emerging fabric of the capital city. Although the lands currently accommodate a variety of land uses and activities including residential, institutional, and industrial uses, the plan provides a framework for new residential and employment areas with their own distinct character, only six kilometres from the city centre. The location is advantageous and considered a 'gateway' to the city, served by strategic road routes and also public transport such as the M50 motorway and Luas Red Line, which can sustain future development.

This Local Area Plan (LAP) builds on the strategic plan for the area published in 2009, and the content of the subsequent Dublin City Development Plan 2011-17, providing a framework for the future development of good urban neighbourhoods, and taking into account changed economic circumstances and current best practice. The LAP provides not only a planned framework for the immediate period of the plan but also identifies a longer-term and balanced strategy for the future. For selected sites at the core of the area it is envisaged that the development of mixed uses, including employment uses, retailing and community uses, will revitalise the area whilst also providing facilities which benefit adjacent communities.

The policies and objectives set out in this plan have the potential to enhance quality of life for both existing and future residents and workers by improving access to existing amenities and also through the creation of new parks and interconnecting green routes, all within a stronger legible urban structure. In all, this plan aims to regenerate the area, establishing a new and sustainable identity.





# Chapter 1: Introduction & Policy Context

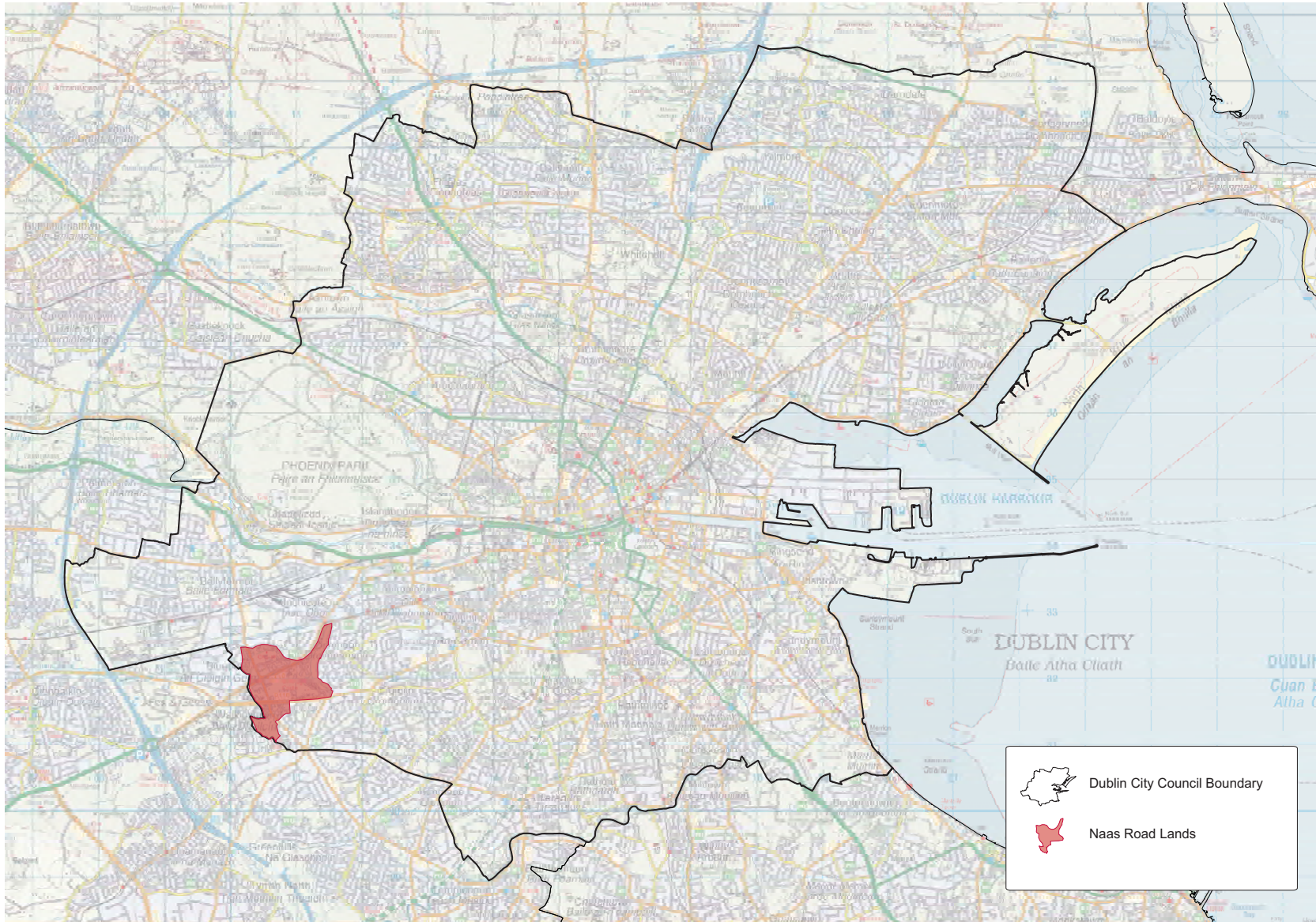
## 1.1 Introduction

The Naas Road lands have been identified in the Dublin City Development Plan 2011 – 2017 as an area for which a Local Area Plan will be prepared. The identification of this area for an LAP reflects the need to plan and manage the future development of this area in an integrated manner. With a number of major brownfield sites in the area which are likely to be the subject of development permissions during the lifetime of the development plan, these changes and redevelopments should all contribute positively to create a successful, sustainable and attractive area in which to live and work. The LAP is the most appropriate tool to achieve this.

The Naas Road Lands plan area occupies a strategic location on a gateway point into the city from the west and includes good public transportation links to the wider metropolitan area including Dublin city centre and Dublin airport. The Luas red line runs through the plan area, connecting it with the city centre to the east and Tallaght / Saggart to the west.

The Kildare mainline railway line, a short distance to the north, provides national connectivity. The plan area is also located in close proximity to the M50 orbital motorway, providing access to outlying areas of Dublin city and beyond.

Map 1.1 Naas Road Lands LAP Area Location





1.1.1 Extent of the Plan Area

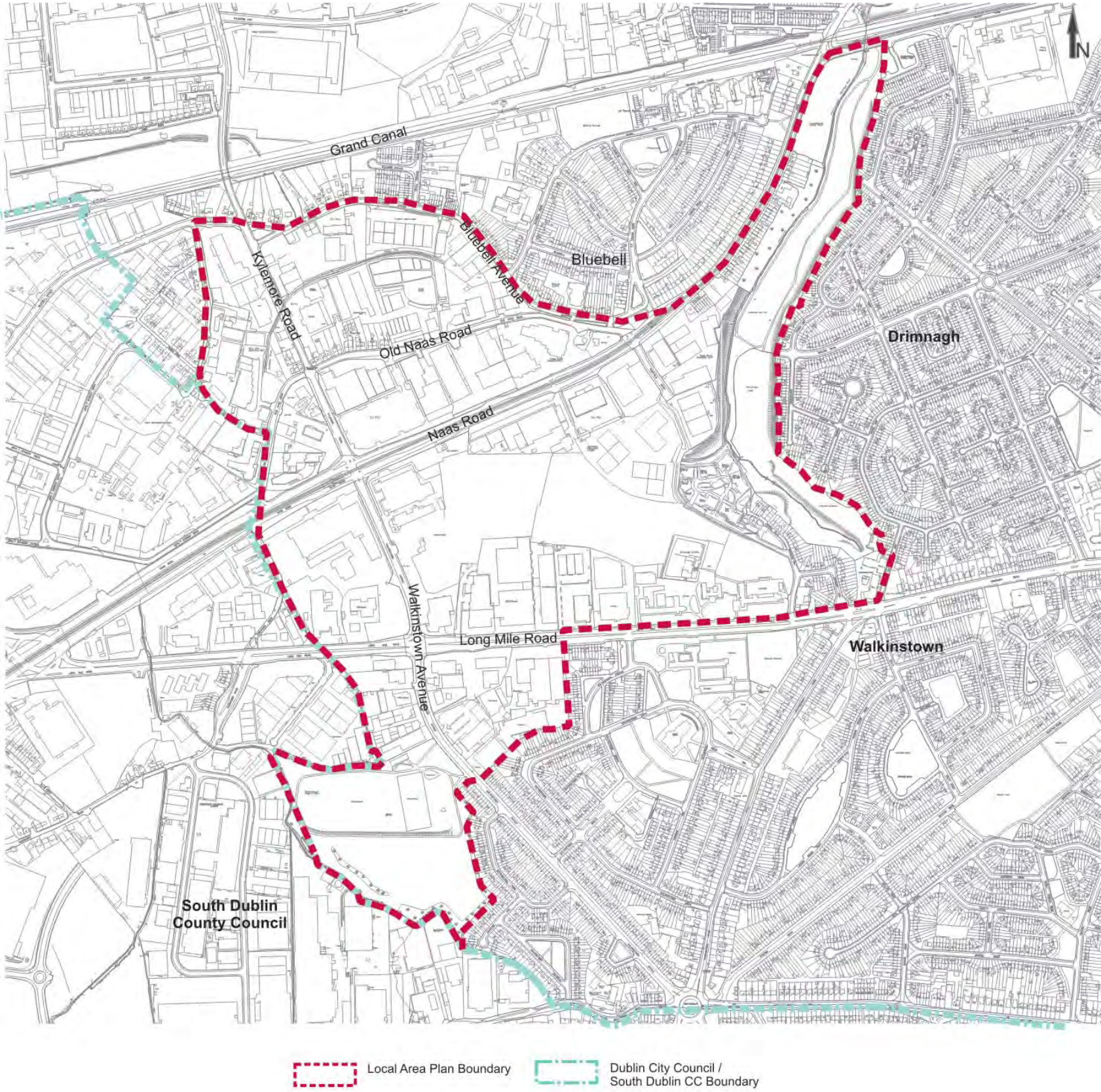
The plan area, comprising approximately 100 hectares, is located some 6km south-west of Dublin's city centre and immediately east of the administrative area of South Dublin County Council.

It is centred on the junctions of the Naas Road, Kylemore Road, Long Mile Road and Walkinstown Avenue and positioned between the residential settlements of the existing city to the east and the residential, industrial / commercial uses to the west towards the M50. It shares boundaries with the communities of Bluebell, Drimnagh and Walkinstown as well as urban areas in the adjoining area governed by South Dublin County Council.

The area is strategically located close to the towns of Clondalkin, Ballyfermot and Walkinstown and is connected to the national motorway network .



Map 1.2 Naas Road Lands LAP Area





### 1.1.2 Rationale for a Local Area Plan

A previous plan for the area titled 'The Naas Road Strategic Lands Plan' was adopted by Council in 2009. There have been significant changes since the strategic plan was devised, relating mainly to the adoption of a new development plan for the city in 2010, and the onset of challenging economic circumstances. The new development plan contains a core strategy which sets out over-arching principles relevant to the Naas Road lands area, whilst the changed economic circumstances will have implications for the delivery of key plan objectives such as strategic infrastructure and community facilities.

Key reasons for revising and updating the 2009 Naas Road strategic plan are set out below :

- *Dublin City Development Plan 2011-2017*

The development plan core strategy designates the Naas Road Area as a major growth area called a 'Key Developing Area' and within it is a designated 'key district centre', or top tier urban centre outside Dublin city centre. It also includes new quality of life initiatives such as the Strategic green network and the compact sustainable neighbourhood. A revisit of the strategic plan will enable these principles to be included along with a strong emphasis on quality of life aspects such as neighbourhoods that support thriving communities, recreational spaces, new linkages and biodiversity.

- *New Opportunity to Look at Interim Uses*

The local area plan process also presents a fresh opportunity to consider appropriate interim uses in the short term given the current economic downturn. Whilst the focus of the new plan will remain on achieving appropriate long-term uses, it is worthwhile to consider suitable temporary uses as an interim solution given the extent of vacant land/buildings in the plan area and in recognition of the fact that temporary uses can revitalise the local area.

- *Delivery of the Plan Strategy*

The strategic plan identified a number of 'big moves' such as road treatment strategies, a pedestrian podium and the under grounding of overhead power lines, as well as a range of new community facilities such as a library resource centre, a theatre community hall, indoor recreational facilities and all-weather playing pitches. To deliver these large scale capital projects, the former plan refers to a number of funding options, all of which rely heavily on development contributions, tax incentives and national funding. In the current economic circumstances, it will be necessary to give greater attention to possible phasing mechanisms in order to achieve the overall urban structure and an interim approach to secure the delivery of large scale capital projects. It will also be necessary to consider viable mechanisms for delivering community facilities with a greater emphasis on the optimum use of such facilities. The LAP is timely in that it can re-assess and give consideration to alternative funding mechanisms and phasing options.

### 1.2 Local Area Plan Preparation Process

The process of preparing an LAP can be summarised in a number of key stages:

(i) Pre-draft stage of research and consultation; (ii) Preparation of a draft plan, (iii) Putting the plan on public display and (iv) Considering the draft plan, making amendments and adopting the finalised LAP.

An overview of these stages for this LAP is outlined below.

#### Stage 1 : Pre-Draft Research and Public Consultation Phase

Preparing the LAP began with initial research and discussion with elected City Councillors. A workshop was held on 25<sup>th</sup> May 2011 with Councillors of the South Central Area Committee in advance of the publication of the pre-draft consultation issues paper. The pre-draft issues paper was put on public display for a six-week period from the 23<sup>rd</sup> June to 4<sup>th</sup> August 2011 with public notification by way of a newspaper notice.

The pre draft issues paper was available for viewing at a number of locations throughout the city including the Civic Offices on Wood Quay, the South Central Area Offices on Marrowbone Lane, the public libraries in Ballyfermot and Walkinstown as well as the following City Council Area Offices in the vicinity of the plan area: Ballyfermot, Crumlin and Kilmainham. In addition, members of staff were available locally on two occasions in the Sheldon Park Hotel, Kylemore Road to assist with any queries in relation to the plan.

In total 13 submissions were received. The key issues emerging from the submissions can be categorised into the following broad themes i.e. (1) retail (2) key district centre (KDC) location, (3) movement and transport, (4) land use strategy, (5) educational facilities, (6) phasing, (7) key sites / site specific issues, (8) infrastructure utilities, (9) infrastructure services, (10) flood risk assessment, (11) built heritage, (12) SEA and AA.

#### Stage 2 : Draft LAP Preparation Phase

The submissions made earlier, along with national, regional and Council policy all have inputted into the content of the draft LAP presented. The text is also informed by other important processes, such as Flood Risk Assessment, Strategic Environmental Assessment and Appropriate Assessment.

#### Stage 3: Public Notice and LAP Public Display

This consultation stage on the draft LAP ran for over 6 weeks, during which time comments and observations were invited in relation to the draft plan. The draft LAP was put on display in the Civic Offices Wood Quay, Ballyfermot Area Office and Walkinstown Library during this period. It was also available for viewing in the Crumlin Area Office

An advertisement was placed in a national newspaper announcing the preparation of a Local Area Plan and details on where it could be viewed as well as details on making a submission on same. A series of public communication seminars were organised as follows ( See table )

|           |                           |               |                                                                                          |
|-----------|---------------------------|---------------|------------------------------------------------------------------------------------------|
| Wednesday | 8 <sup>th</sup> August    | 16:00 – 19:00 | Ballyfermot Area Office, Ballyfermot Community Civic Centre, Ballyfermot Road, Dublin 10 |
| Tuesday   | 14 <sup>th</sup> August   | 17:00 – 20:00 | Bluebell Youth and Community Centre, Bluebell Road, Dublin 12                            |
| Wednesday | 5 <sup>th</sup> September | 16:00 – 19:00 | Walkinstown Library, Percy French Road, Dublin 12                                        |

A copy of the draft plan was also sent to bodies prescribed under the Planning and Development Act such as the Department of Education & Skills (DES) and the Department of Environment, Community and Local Government (DoECLG). Once this consultation period was completed, a Manager's Report was prepared on the submissions received and presented to the Council.

#### Stage 4: Preparation of Manager's Report on Submissions/ Observations

A Manager's Report was prepared on the submissions and observations received during the public display period of the LAP. The report was submitted to the elected members of the city council for their consideration. The elected members had 6 weeks to consider the report and adopt / amend the plan. Significant changes were placed on public display for 4 weeks from the 9<sup>th</sup> November to the 7<sup>th</sup> of December 2012.

#### Stage 5 : Making the Adopted Plan

A managers report further to receipt of submissions was considered by the City Council at a meeting on January 14<sup>th</sup> 2013. At this meeting the elected members, by resolution, decided to make the LAP. In recognition of the importance in seeking delivery of the plan, the LAP includes a section dedicated to its implementation. A number of the policies and objectives contained in the plan require coordination, both between various Council departments and also with other agencies, public and private. The LAP focuses on achieving an integrated approach to managing change.

An LAP is a six year document, which can be extended to 10 years by the City Council. During its life the LAP may be amended or revoked following statutory public consultation processes.

#### Public Consultation

Consultation is a critical part of the process of preparing an LAP. The plan is prepared with input from many people and organisations including:

1. Elected Members of the City Council (Councillors)
2. Members of the public
3. Departments within the City Council
4. Residents' associations, community groups, non-governmental agencies, etc.
5. Prescribed bodies, e.g. the Department of Environment, Community and Local Government (DoECLG), Department of Education and Skills (DES) etc.
6. For this plan a number of special dedicated consultation events have, taken place during the plan preparation process.



### 1.3 Statutory Context for the LAP

The overarching theme of national planning policy which informs this LAP is the consolidation and sustainable use of land in urban areas, particularly urban environments well served by public transport.

Urban consolidation is a key component in the achievement of sustainable development economic competitiveness, community well being, environmental protection and also to achieve full economic value from investment in public infrastructure.

This LAP is informed and in keeping with the hierarchy of national, regional and city planning policy, the key provisions of which are detailed below. The purpose of this LAP is to translate national and regional policy to the local level, in accordance with the provisions of the Dublin City Development Plan 2011-2017.

#### 1.3.1 National and Regional Plans

The Naas Road Lands LAP has been prepared to ensure consistency with the guidance, strategies and policies at national and regional level, as well as the development plan core strategy and its policies and objectives. This approach ensures that the LAP takes cognisance of and represents an appropriate fit with the higher level plans. It will also result in a hierarchy of plans from national to the local level relevant to the Naas Road Lands area.

The plans and policy documents which have informed the preparation of this LAP include the National Spatial Strategy 2002-2020 (NSS), the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 (RPGs), the Government's Smarter Travel - A Sustainable Transport Future 2009-2020, the National Development Plan 2007 - 2013, the National Climate Change Strategy 2007-2012 and the Dublin City Development Plan 2011-2017. The national and regional level policies have all been integrated into the City Development Plan which in turn directs and guides the strategy for the Naas Road LAP.

As with all of the relevant Guidelines issued by the Department of Environment, Community & Local Government, the LAP fully takes into account the most recent Guidelines published 'Guidelines for Planning Authorities – Retail Planning' published in April 2012.

- **National Spatial Strategy 2002 - 2020**  
**"National & Regional Plans"**

The National Spatial Strategy (NSS) recognises that Dublin, as the capital city, plays a vital national role and that the performance of its economy is essential to the success and competitiveness of the national economy. In order to sustain this role as the engine of the economy, it advocates the physical consolidation of Dublin, supported by effective land-use and transportation policies, as an essential requirement for a competitive Dublin.

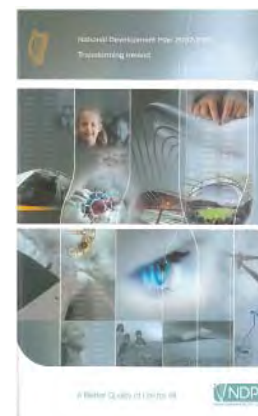


The NSS places particular emphasis on the physical consolidation of the metropolitan area, which incorporates the entire functional area of Dublin City Council. There is also an emphasis on supporting the city's capacity for employment and innovation and achieving intensification without compromising amenity or environmental quality. This emphasis is particularly relevant in the context of the local area plan, having regard to the substantial employment generating capacity and the potential for enhancement of the physical environment of the Naas Road area.

- **National Development Plan 2007-2013**

The National Development Plan 2007-2013 (NDP) sets out a regionalised development strategy supported by a multi-annual investment commitment in the key areas of education and training, infrastructural development, the productive sector and the promotion of social inclusion.

The NDP supports a strong and competitive Greater Dublin Area so that it continues to drive its own development and that of the state through improved and greater public transport mobility, development of more compact and sustainable communities and high quality international transportation connections.



- **Regional Planning Guidelines**  
**Greater Dublin Area 2010 - 2022**

The Regional Planning Guidelines for the Greater Dublin Area 2010 - 2022 (RPG) translate the national strategy to regional level with an emphasis on Dublin as the driver of national development and the need to physically consolidate the growth of the metropolitan area, with clear direction for greater integration of land-use and transport planning.

The RPG settlement hierarchy seeks to prioritise and focus investment and growth to achieve integration in services, infrastructure, transport, economic activity and new housing.

This approach reflects the prioritisation of public transport infrastructure, reducing the need to travel and a reduction in green house gas emissions as set out in a number of government policy documents such as Transport 21, Smarter Travel and National Climate Change Strategy.



There is a clear link between the NSS, the RPG and the Dublin City Development Plan, as well the plans and policies which complement and support their implementation such as the National Development Plan. The development plan core strategy in turn informs this LAP for the Naas Road lands.

- **Retail Strategy for the Greater Dublin Area 2008-2016**

The purpose of the retail strategy is to guide the activities and policies for retail planning across the seven Councils of the Dublin and Mid East Region and to set out a co-ordinated, sustainable approach to the assessment and provision of retail within the GDA so that:

- Adequate and suitable provision is made to meet the needs of the growing and changing population.
- Retail in suitable locations is provided, integrated within existing growth areas and public transport investment, and
- Significant overprovision is avoided as this would undermine sustainability driven policies aimed at revitalising town centres.

At the core of the strategy is the revised retail hierarchy for the GDA. The hierarchy and policy of the strategy reconfirms the role of Dublin city centre as the prime retailing centre for the Greater Dublin Area. This hierarchy reinforces the RPG policies.

The strategy states that it is important where large areas of new housing are planned that new retail centres are provided in tandem with the housing at a scale appropriate to meet the regular convenience and lower order comparison shopping needs of these new communities.

In the interests of sustainable development, the strategy recommends the provision of new district centres where they are (a) needed and (b) appropriate and justified from a co-ordinated planning perspective. The LAP identifies one district centre.





- **Smarter Travel – A Sustainable Transport Future 2009 - 2020**

The government launched ‘Smarter Travel – A Sustainable Transport Future’ in 2009.

The overarching aim of the document is that by 2020 future population and economic growth will occur predominantly in sustainable compact locations. It sets out how the government’s vision of sustainable travel and transport in Ireland by year 2020 can be achieved. A target of reducing car based commuting from 65% to 45% nationally by 2020 is set.



Five key goals of ‘Smarter Travel – A Sustainable Transport Future’ are to:

1. Reduce dependency on car travel and long distance commuting
2. Increase public transport modal share and encourage cycling and walking
3. Improve quality of life and accessibility for all
4. Improve economic competitiveness through increased efficiency of the transport system, and
5. Reduce green house gas emissions and dependency on fossil fuels.

- **Greater Dublin Area Draft Transport Strategy 2011 - 2030 : 2030 Vision**

The National Transport Authority has published a draft strategic transport strategy for Greater Dublin Area (GDA) for the period up to 2030. The goal of the strategy is to support the GDA in meeting its potential as a competitive, sustainable city region with a good quality of life for all.

The strategy represents the top level of transport plans within the regional hierarchy that will include an implementation plan and a strategic traffic management plan.



The strategy identifies key transport principles that are important to quality of life, particularly:

- a strong focus on pedestrian and cycling movement for local trips,
- exploring the ability of public transport to cater for the mass movement of people while using a fraction of the fuel and street space required for cars,
- balancing the demand for car travel with other modes so that walking and cycling are the dominant modes and public transport is dominant for longer trips,
- favouring and incentivising cleaner, quieter and safer vehicles for delivering goods in urban areas,
- provision of lively central areas which focus retail at ground floor levels and offices and residential above, so streets are vibrant,
- intensification and consolidation of towns and cities by building on brownfield and vacant land or reusing underutilised lands,
- enhancing the unique culture of the GDA, and recognising local culture and natural amenity,
- increasing connectivity and permeability, to make walking and cycling more appealing,
- ensuring that streets and public spaces are well built, well designed and can be well managed.

These principles are incorporated into the approach adopted in shaping this LAP, as it seeks to support sustainable transport and improve quality of life and the urban experience within the Naas Road lands plan area. The LAP supports the delivery of, and is consistent with, the strategy.

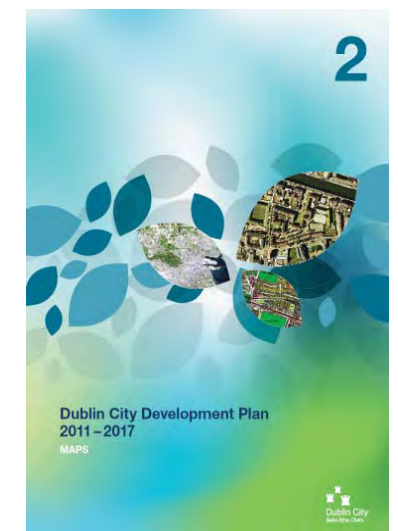
### 1.3.2 Dublin City Council Development Plan 2011-2017

The Dublin City Development Plan 2011 – 2017 provides a clear spatial framework to guide the future growth and development of the city in a coherent, orderly and sustainable way, framed on a vision of sustainable city living and a core strategy seeking –

- a compact, quality, green, connected city
- real economic recovery, creative networks and a smart innovative city,
- to create sustainable neighbourhoods and communities.

The development plan strategy for the city has a strong policy emphasis on the need to gain maximum benefit from existing assets such as public transport and social infrastructure, through the continuation of consolidation and increasing densities within the existing built footprint of the city.

This is in line with the regional planning guidelines policy of consolidation of the metropolitan core. A further key aspect is that future expansion whether housing or mixed-uses, occurs in tandem with high-quality rail-based public transport and on a phased basis within the context of local area plans.



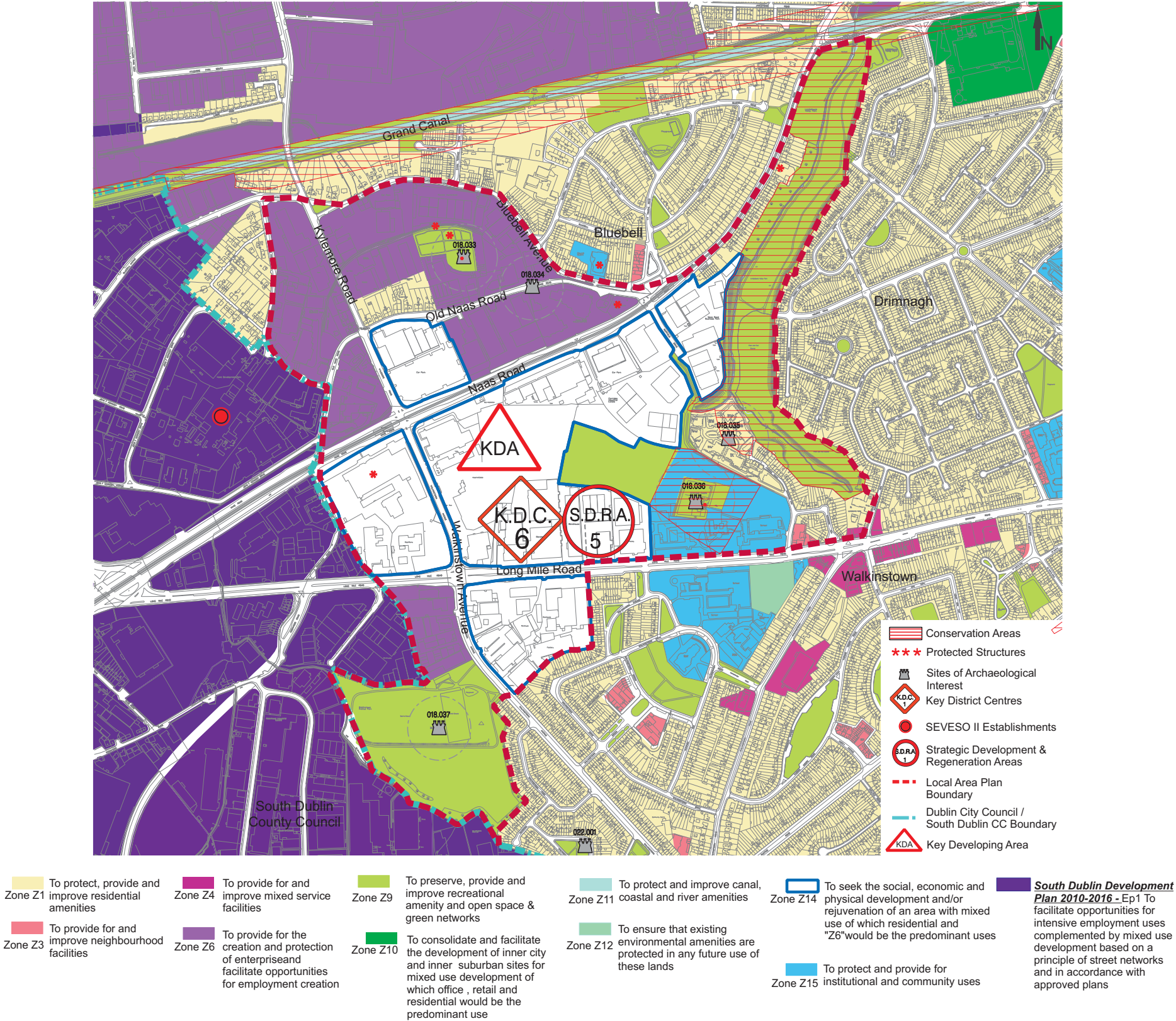


Zoning

Under the city development plan the 100 hectares of the local plan area is mostly zoned Z14 (38%) – ‘to seek the social, economic and physical development or rejuvenation of an area with mixed use of which residential and “Z6” would be the predominant uses’ and Z6 (23%) – ‘to provide for the creation and protection or enterprise and facilitate opportunities for employment creation’.

A relatively large section (29%) of the plan area is zoned Z9 – ‘to preserve, provide and improve recreational amenity and open space, while smaller portions in the north and the east of the plan area are zoned Z1, Z15,Z3 ,Z4, and Z11 .

Map 1.3 Development Plan Zonings and Objectives.





– Key Developing Areas and Key District Centres;

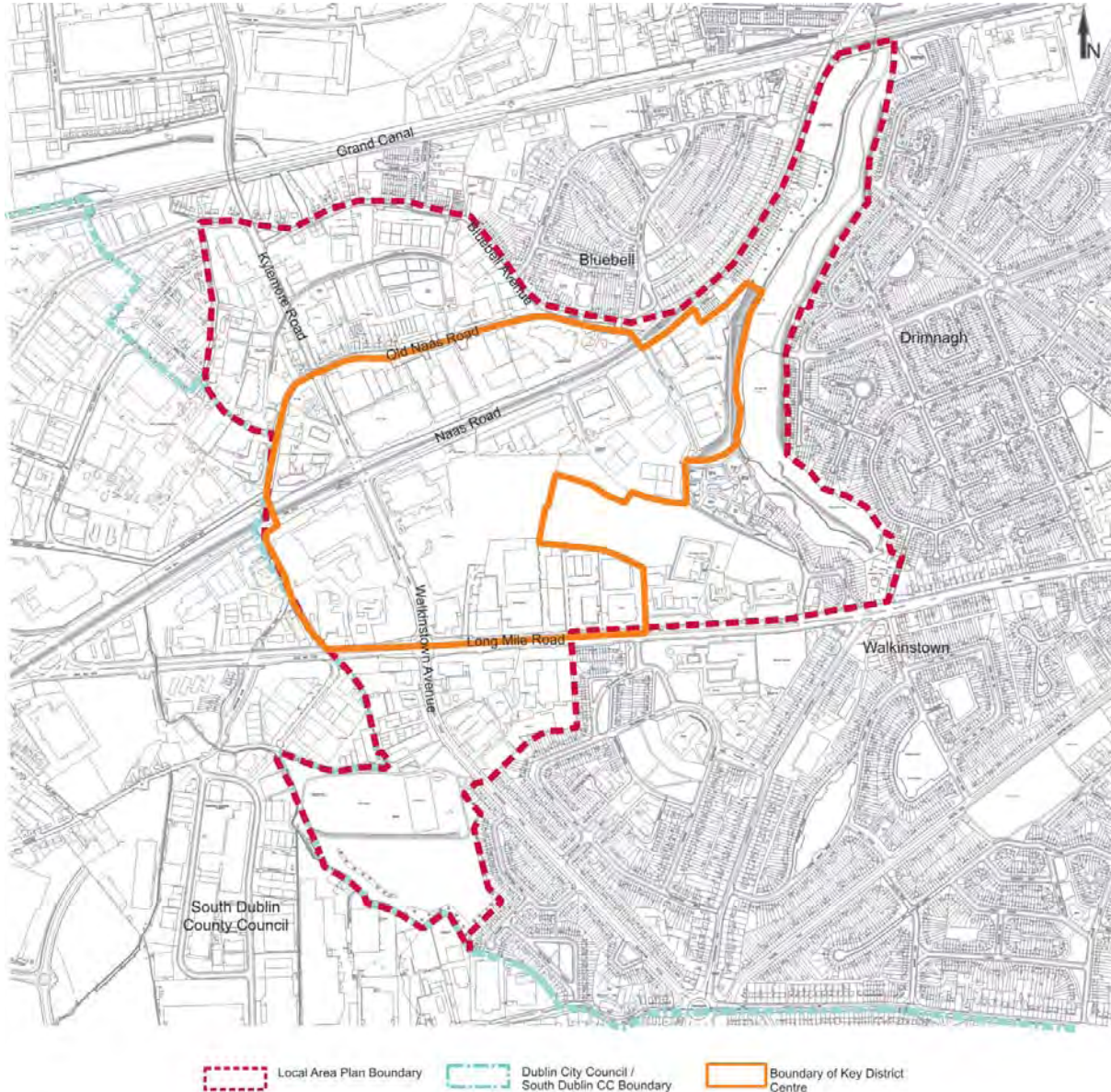
The development plan seeks to achieve integration of services, infrastructure, public transport, economic activity and new residential development identified in the key development area's (KDA) and key district centres (KDC). The development plan core strategy designates a key district centre at the hub of the Naas Road key development area.

KDAs are significant areas in the city with substantial development capacity and the potential to deliver the residential, employment and recreational needs of the city. All the KDA locations are served or proposed to be served by high quality rail-based public transport and relate to a zoning objective which seeks the social, economic, physical development or rejuvenation of an area with residential, employment and mixed-uses.

The development plan core strategy sets out the relative share of housing growth and identifies the employment / commercial capacity of each KDA. For the Naas Road KDA, the capacity is estimated at circa 2,100 housing units and circa 63 Ha of zoned commercial / employment lands, indicating significant employment capacity of mixed-use development.

KDCs are the top-tier of urban centres outside the city centre. Each of the KDCs provides a comprehensive range of commercial and community services to the surrounding populations. The development plan has designated a new KDC at the Naas Road, in recognition of the potential of these lands to act as a strong social and commercial hub for the surrounding area.

Map 1.4 KDC Area in Context



Naas Road Strategic Development and Regeneration Area (SDRA);

The development plan seeks to realise the full potential of the SDRAs. These are significant, largely brownfield areas, with the potential to deliver significant quantum of mixed uses and create synergies to regenerate their respective areas. To this end guiding principles have been set out in the development plan specifically for the Naas Road lands;

1. *Link the plan area with the surrounding environment to assist in enhancing a living community in and around the area*
2. *Create connectivity throughout the plan area – removing barriers to movement and opening up attractive links between key areas*
3. *Use existing and proposed infrastructure to establish a strong and interactive relationship with Dublin city and the wider environment*
4. *Establish new and appropriate landuses that assist in creating relationships between one another, and support a growing mixed use community*
5. *Seek innovative design responses for key sites (collectively and individually) that respond to the environmental, social, cultural and economic issues and demands facing the plan area*
6. *Provide publicly accessible open spaces and green infrastructure which contribute to the amenities of the area and the green network*

**The Retail Strategy for Dublin City** promotes an upper tier of retail locations designated as KDCs. Designation of the Naas Road KDC is on the basis of the anticipated quantum of new development in this emerging new developing area and having regard also to the provisions for new residential development for adjoining lands as set out in a framework plan prepared by South Dublin County Council.

The designation accords with principles of accessibility and sustainability as set out in the regional and city retail strategies, having regard to the relative under-provision of convenience and comparison retail in the plan area.

**The Strategic Green Network** is an important quality of life aspect of the development plan core strategy. The concept relates to a green infrastructure network that connects green spaces and other natural features such as rivers and canals to different parts of the city and also links to areas within the city region. It involves integrating open spaces, green corridors for cycling and walking, areas of high biodiversity value and recreational areas. The strategic green network is to be delivered through both local area plans and through the development management process.

**The Development Plan Core Strategy** promotes three new innovation corridors radiating from the city-centre, including the Naas Road Rail Innovation Corridor which runs westwards from Heuston, and includes the Digital Hub, St. James Hospital, Parkwest / Cherry Orchard, the Naas Road Developing Area and extending into the wider metropolitan area to incorporate new urban centres such as Adamstown. (These corridors were identified in the Economic Development Action Plan for the Dublin City Region 2010 as prepared by the four local authorities in the region).



## – Six Themes

The development plan identifies six over-arching themes which it sees as integral to the sustainable growth and development of the city. The application of the themes at all levels, from plan-making to urban projects and development management will help to deliver a better quality of life for all. The six themes constitute inter-related and essential elements of a sustainable approach to the future development of the city and have been utilised in the formulation of this local area plan.

The city's six over-arching themes for the future development of Dublin are as follows:

1. Economic – Developing Dublin city as the heart of the Dublin region and the engine of the Irish economy with a network of thriving spatial and sectoral clusters, a focus for creative talent and creative assets.
2. Social – Developing Dublin city as a compact city with a network of sustainable neighbourhoods which have a range of facilities and a choice of tenure and house types, promoting social inclusion and integration of all ethnic communities.
3. Cultural – Making provision for cultural facilities and protection of our built heritage throughout the city and increasing our awareness of our cultural heritage and built heritage promoting safe and active streets through design of buildings and the public realm.
4. Urban Form and Spatial – Creating a connected and legible city based on active streets and quality public spaces with a distinctive sense of place.
5. Movement – Helping to build an integrated transport network and encouraging the provision of greater choice of transport. Planning and zoning objectives will be brought together to increase the opportunities to live and work close to transport hubs and corridors.
6. Environmental – Providing for an overall framework involving key principles, strategies and objectives to drive a vision of 'Sustainable Dublin' over the next 25 to 30 years, making sure that buildings can adapt to changing needs and encouraging better waste management strategies.

## – Height Strategy

The Development Plan, in providing guiding principles on building height, sets 'low rise' as a constraint for this area pending the adoption of an LAP. This limits proposals to 4 storeys for both residential and office use.

Through the LAP process however, the Development Plan recognises scope for the delivery of a limited number of mid-rise buildings to complement proposals for a new key district centre and supporting a mix of uses.

The junction of Naas Road, Walkinstown Road, and Kylemore Road is identified as a significant node with potential for a small cluster of mid-rise buildings in a coherent pattern. In this instance 'mid rise' is defined in the city development plan as up to 16 storeys of residential use or 12 storeys of offices.

### 1.3.3 Other Relevant Plans

#### (i) Naas Road Lands Strategic Plan (2009):

This is a non-statutory plan adopted in May 2009 and is used by Dublin City Council for development management and guidance purposes pending the adoption of the statutory Naas Road Lands Local Area Plan. The aim of the plan is to facilitate and coordinate the redevelopment of lands within the Naas Road study area and to ensure that new development interacts positively with the local and city-wide environment; redefining the relationship of the plan lands to their immediate surrounding communities and physical environment.

#### (ii) Drimnagh Integrated Area Plan (2009)

This is also a non-statutory plan used by Dublin City Council for development management and guidance purposes.

The summary objectives of the plan are to:

- (i) develop a sense of place and identity for Drimnagh;
- (ii) to strengthen the urban structure and create legibility;
- (iii) improve permeability;
- (iv) enhance green spaces and amenity;
- (v) provide for better links with Drimnagh Castle;
- (vi) create a diverse mixed-use community;
- (vii) create guidelines for the redevelopment of identified sites;
- (viii) propose community gain opportunities and
- (ix) make proposals for the reorganisation of social services.

In 2010, Drimnagh Smarter Travel was officially launched with funding approved by the Department of Transport, Tourism and Sport for Dublin City Council to implement 3 initial projects i.e.

- (1). Walking routes through Lansdowne Valley Park and along the Grand Canal,
- (2). Signage & improved lighting, and
- (3). New bicycle parking at key locations.

#### (iii) South Dublin Development Framework 2010:

The Naas Road Development Framework Study was noted by elected members of the Lucan-Clondakin and Tallaght Area Committees of South Dublin County Council on the 19<sup>th</sup> May 2010 and 26<sup>th</sup> April 2010, respectively.

The key elements of the framework are:

- (i) the maintenance of the green belt between Clondakin and Tallaght,
- (ii) the consolidation of the majority of redevelopment east of the M50,
- (iii) a new Luas stop between Red Cow and Kylemore and
- (iv) the creation of a green corridor and new road links east of the M50, particularly from the existing Nangor Road/Long Mile Road junction in a citybound direction.

#### (iv) Dublin City Canals Study Report 2010:

This study commissioned by Dublin City Council, Fáilte Ireland and the Dublin Docklands Development Authority and completed in 2010, aimed to identify the recreational, tourism and commercial potential of the Royal and Grand Canals. The project sought to examine existing activities on the canals, identify achievable projects, and establish the necessary investment and maintenance framework for the canals.

It identified opportunities to:

1. Enhance the quality of lands surrounding the towpath
2. Create more linkages to surrounding businesses and communities
3. Improve public safety and road crossings
4. Promote the canal as a recreational space, and
5. Develop links to Luas and Parkwest



# Chapter 2 Site Context and Analysis

## 2.1 Current Environment

### 2.1.1 Description of the Area and Adjoining Lands

The plan area occupies approximately 100 hectares characterised mainly by industrial/commercial landuses and community land-uses. Many industrial uses are land-extensive and occupy very large impermeable sites. Amenities in the area include the Grand Canal, Lansdowne Valley Park, Drimnagh Castle and Walkinstown Park, yet some of these are poorly integrated with the surroundings.

The Grand Canal lies to the north of the LAP boundary, acting as a physical and visual boundary with continuous development, mainly industrial and residential, on either side. Industrial areas include Kylemore Industrial Estate, Royal Liver Assurance Business Park, Jamestown Industrial Estate, and Goldenbridge Industrial Estate. The canal has been enhanced in recent years and it is now possible to walk and cycle along its banks from the 3<sup>rd</sup> to the 12<sup>th</sup> lock as part of the developing strategic green network. Lansdowne Valley Park and Drimnagh Castle create a buffer between residential and industrial development, although at present these are somewhat under-utilised as amenity areas.

The western boundary of the plan area is also the administrative boundary between South Dublin County Council and Dublin City Council and therefore adjoining uses must be considered.

### Residential Communities in the Plan Environs

**Bluebell:** Comprises a mix of houses and flats constructed by the local authority in the 1950s/1960s. The houses are two-storey while the flats vary from two-storey blocks incorporated among the houses to four medium-rise blocks between Bluebell Road and the Grand Canal.

**Ballyfermot:** Comprises predominantly two-storey terraced houses typical of the 1940s, 1950s and 1960s. It extends westward from Inchicore to Palmerstown with the River Liffey and Chapelizod forming the boundary to the north and the Grand Canal to the south.

**Crumlin:** This area was developed mainly in the 1930s and 1940s to provide local authority housing for inner city families. It is a large area, extending several miles southwest of the Grand Canal, with the main village centre to the west close to the boundary with South Dublin. There is some private housing, mainly at the northern and western edges, which also dates mainly from the 1930s. The local authority housing, much of which is now in private ownership, is two-storey terraced housing typical of the period, and is laid out around a number of green spaces in garden city style. The area includes local and national services such as Crumlin Shopping Centre and Crumlin Hospital.

**Drimnagh:** Comprises mainly two-storey terraced housing, part privately built and part local authority built, developed mainly in the 1940s and 1950s. Drimnagh Village is located along the Crumlin-Drimnagh Road. There is no major retail centre, but the area adjoins Crumlin Shopping Centre.

**Inchicore:** Lies west of Kilmainham between the railway line and the canal. The area has a mix of housing types and tenures including former local authority houses built in the 1920s/1930s, artisan dwellings, period houses and modern apartment and townhouse developments. Houses are generally two-storey, with apartment blocks rising to four and five storeys in the newer developments.

Map 2.1 Existing Communities



**Walkinstown:** Lies to the southwest of the area, west of Drimnagh and Crumlin. Part of the area is located in South Dublin, with the Walkinstown Roundabout and Cromwellsfort Road forming the boundary. The area is predominantly residential with some industry at the north western end adjoining the light industrial belt around the Naas Road. The bulk of the housing stock dates from the mid-twentieth century.

**Parkwest:** Located to the north-west of the plan area, this is a recently established residential and business park developed in a campus-style layout.

### 2.1.2 Current Land Uses

#### Overview

The dominant form of development in the area is industrial, light industrial and commercial. There is some residential development, including older housing stock along the Old Naas Road and at Walkinstown, and recent multi-storey apartment developments adjoining Lansdowne Valley. There are a number of churches and schools in the wider area.

#### • Employment Uses

The main economic activities within this area relate to car trading and car distribution, retail warehousing, and also some offices. There are also some industrial estates, businesses parks and retail parks within this zone such as Naas Road Business Park, Denhu Business Complex and Royal Liver Retail Park. The industrial and commercial buildings are generally large warehouse-type structures, or low rise buildings set within industrial and business parks such as at the Naas Road, and Carriglea.

#### • Seveso Sites

There are presently three 'Seveso Sites' in the vicinity of the plan area, all of which lie within the administrative area of South Dublin County Council.

The sites are as follows:

1. Irish Distillers Robinhood Road, Clondalkin, Dublin 22
2. BOC, Bluebell Industrial Estate, Dublin 12,
3. Kayfoam Woolfson, Bluebell Industrial Estate,

#### • Residential Uses

The plan area contains approximately 500 residential units (circa 120 houses and 380 apartments). These consist of small residential areas of older housing and some limited apartment development built to higher densities over the past decade. There are approximately 1300 residents in the plan area at present. The main residential areas are in the areas of Slieve Bloom Park, fronting the Naas Road at Bluebell, and also at the Old Naas Road. More recently a number of apartment developments have been completed on sites off the Long Mile Road.

#### • Amenity and Open Spaces

The area contains extensive open space areas and a good level of tree planting. A number of the industrial plots contain mature trees, whilst there has also been landscaping and tree-planting along the Luas route .

Walkinstown Park and Lansdowne Valley Park contain walking routes, but these have restricted pedestrian and cycleway permeability to the wider area.



2.1.3 Population and Demographic Profile

The plan area is located within the Dublin City Administrative Area of Dublin South Central and primarily straddles the Electoral Divisions (EDs) of 'Walkinstown A' and 'Inchicore B', while the Lansdowne Valley Park and Lansdowne Valley residential development lie within the EDs of 'Crumlin A' and 'Crumlin F'.

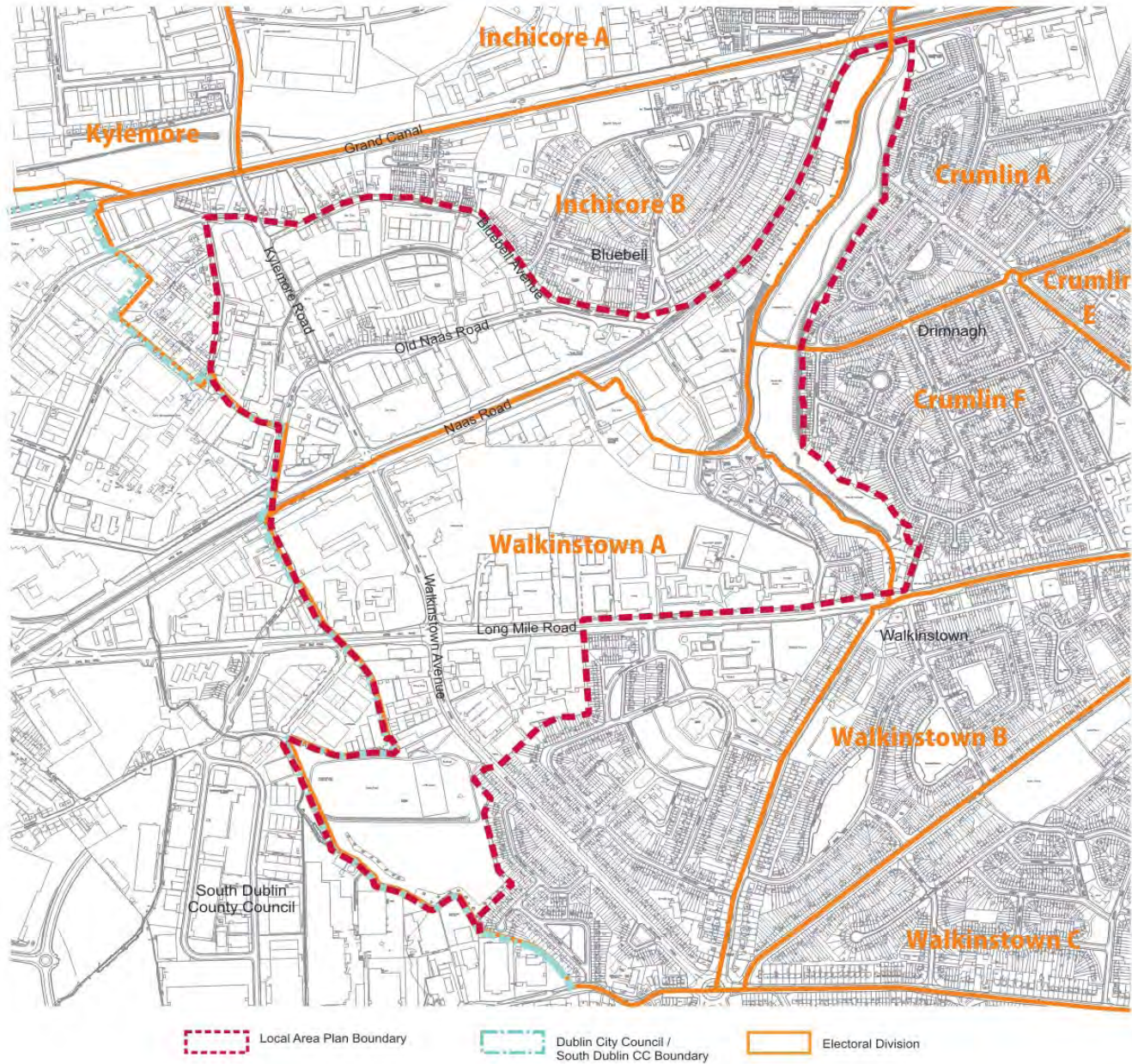
Part of the plan area is included in the Canal Communities Rapid and Partnership area. The preliminary census data for 2011 indicates a 28% (557 persons) increase in the Electoral Division (ED) of 'Walkinstown A', a decrease of 2.3% in 'Crumlin F', a 4.8% decrease in Crumlin and a 6.9% increase in population in 'Inchicore B'. The notable increase in population in the ED of 'Walkinstown A' is as a result of the introduction in 2006 / 2007 of a new development at Lansdowne Gate consisting of approximately 280 residential units.

The communities in the surrounding areas have an age profile weighted towards an older population group with an above average concentration of individuals over 65 years and a below average proportion under 19 years of age.

The latest census figures available also show a higher percentage of people unemployed compared to the national rate and also a significantly higher proportion of people with lower educational attainment. Educational attainment on average is low in the area, with almost one in three residents not having completed any formal education or having only completed primary education, compared to one in five for the city as a whole. This also reflects in part the age profile of the area. Male workers are primarily engaged in manufacturing and female workers in clerical work.



Map 2.2 Electoral Districts





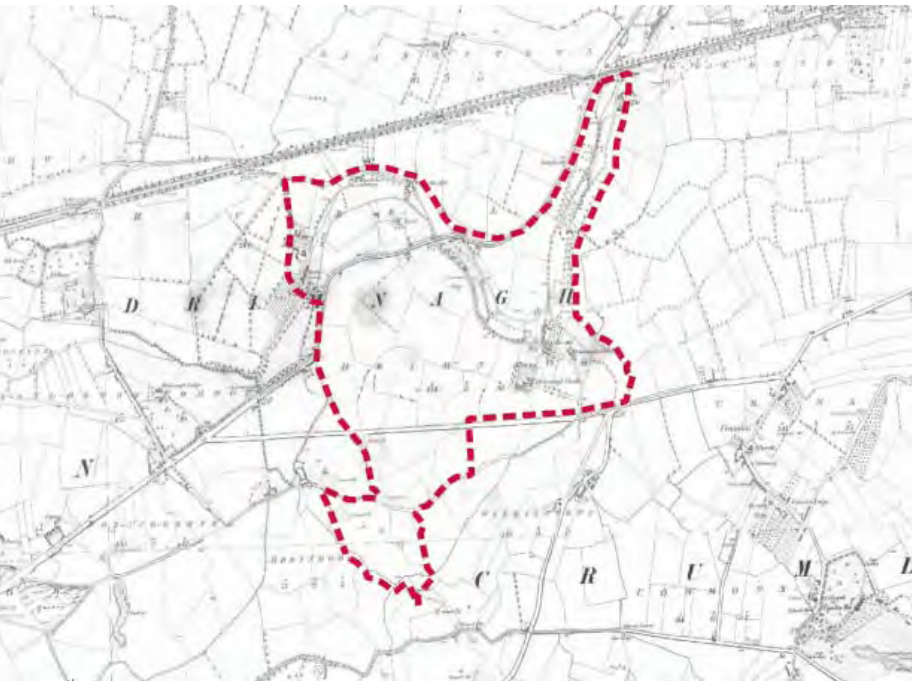
2.1.4 Historical Development of the Area

The earliest recognisable settlement is the 13<sup>th</sup> Century Anglo-Norman Drimnagh Castle, (protected structure and conservation area) strategically placed at an access point into the city and adjacent to a water source (Camac river). The castle is an outstanding example of an old feudal stronghold and is the only Irish castle still to be surrounded by a flooded moat.

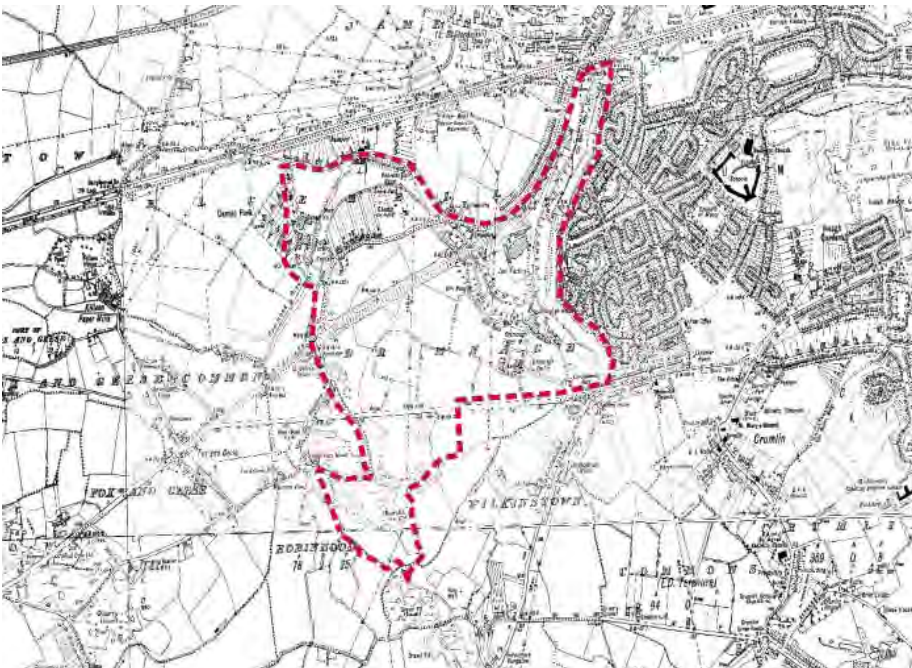
Ordnance Survey mapping from the mid-19<sup>th</sup> Century shows the area in agricultural use surrounded by small villages including Walkinstown and Crumlin and to the north the Grand Canal (1790) and the Kildare Rail Line which formed strong connections between Dublin and the rest of Ireland. By the mid 20<sup>th</sup> Century, Dublin City had expanded rapidly, reaching the Cammock river valley (now Lansdowne Valley Park). Development was mainly two-storey, low density residential, often without a defined centre in areas such as Ballyfermot, Crumlin, Drimnagh and Walkinstown. By the late 20<sup>th</sup> Century the spread of Dublin city had moved beyond the Cammock River Valley and with an increasing demand for extensive sites for large industrial and commercial uses, the Naas Road lands became occupied by vehicle distributor yards, warehousing and industrial estates.

In addition to Drimnagh Castle, there are a number of built heritage features in the plan area, including the medieval church ruins in Bluebell Cemetery (archaeological site) located in a backland setting off the Old Naas Road, Walkinstown Park (archaeological site) ,examples of 20<sup>th</sup> Century architecture such as Naisetra House (protected structure) located along the Naas Road, and the Volkswagen Factory (Protected Structure dating from 1955) on the Naas Road. The Grand Canal Bank and Lansdowne Valley Park are designated as conservation areas under the city development plan.

Map 2.3 Ordnance Survey 1849



Map 2.4 Ordnance Survey 1946



2.1.5 Transport Infrastructure

The plan area benefits from a high level of accessibility in terms of vehicular and public transport access. However, with two main arterial routes to the south and south west of the country (N4 & N7) traversing the area, traffic flow is heavy with a significant element of through traffic.

This results in limited pedestrian realm and poor permeability. However, the area includes sustainable transport modes, with a QBC, Luas and cycle lanes. The area benefits from two Luas stops within the plan area and close proximity to the park and ride facility at the Red Cow motorway interchange. In addition, the Arrow Rail-Line, a suburban commuter service, serves the Parkwest area which lies in close proximity to the north of the plan area.

The mainline-railway from Heuston Station to the western part of the country traverses the plan area but there are currently no stops in the vicinity. A number of frequent bus services provide east to west and north to south connections across plan area and to the city centre.

Transport 21 proposals include extensions to the Luas Line F (Lucan to the City Centre) accessing the industrial lands to the north of the Naas Road in the vicinity of Kylemore Park. Two Luas corridors will therefore be available for the area in the longer term.

2.1.5.1 Other Infrastructure

- Electricity Pylons

110KV / 38KV high voltage lines and supporting pylons run in a north south direction through the area. These are a constraint to future development, and a possible alternative approach is the undergrounding of cables in collaboration with the ESB.



- Water Services

A principal watermain of the area runs diagonally through the area from the Robinhood area to the Naas Road. There is a connection off this watermain where it crosses the Long Mile Road and the area is generally fed from this connection via a network of smaller pipes. This wayleave needs to be protected from development.



- Waste Water Network and Surface Water

Waste water from the area drains to two separate catchments – the Grand Canal Tunnel Catchment and the City Centre Catchment. These discharge to the Regional Waste Water Treatment Plant at Ringsend. Surface water runs both to a combined foul/surface system and also to a separate system in some areas - where it discharges to the river camac.



(See section 4.8 on 'Infrastructure and Water Management' for greater detail on piped services)

- Other Utilities

The area is well served by gas and electricity services.



### 2.1.6 Community Audit

Given the largely industrial nature of the plan area there are relatively few community facilities at present. Lands south of the Naas Road have been zoned for institutional and community uses (Z15) and consist of a concentration of educational and religious uses, including a primary and secondary school (for boys) which is accessed from the Long Mile Road. Just outside of the plan area, and directly opposite the boys' school, is a primary and secondary school (for girls) also accessed off the Long Mile Road. A small area at the junction of Slievebloom Park and the Long Mile Road is designated for neighbourhood facilities (Z3), whilst lands at the junction of Walkinstown Road and Balfe Road are zoned for mixed service facilities (Z4), a small portion of which are within the plan area. Along the western boundary of the plan area, lands zoned for amenity and green networks (Z9) include Lansdowne Valley Park which is 8 hectares in extent and contains pitch and putt facilities.

#### 2.1.6.1 Social Infrastructure Elements

As a baseline study, the focus here is on key social infrastructure elements as defined by the Government's Developing Areas Initiative, 2007: Educational and Childcare Facilities; Community and Social Facilities, Passive Amenity & Open Space and Retail.

A social infrastructure gap analysis has been carried out for this area and has identified the following community infrastructural needs:

1. library / resource centre
2. affordable childcare facilities
3. play spaces
4. all-weather playing pitches
5. indoor recreation / entertainment facilities (e.g. 5/6 screen cinema, family recreation centre)
6. canal leisure / recreational facilities
7. theatre / community hall for the arts
8. incubation units
9. affordable living & working units for artists

#### 2.1.6.2 Education and Childcare Facilities

The educational requirements of school-goers are relatively well serviced with a large number of primary and secondary schools in the wider area. Anecdotal evidence suggests that in recent years demand for primary class places can exceed supply, possibly reflecting the higher numbers attaining primary level education in comparison to secondary level. Post-secondary and adult education facilities are readily available with a number of vocational colleges in close proximity as well as two training centres in the plan area (Agri-Aware and Irish Academy of Training).

| Name                                   | Location                      | Distance from Plan Area (km) | Type    | Gender | Enrolment |
|----------------------------------------|-------------------------------|------------------------------|---------|--------|-----------|
| PRIMARY                                |                               |                              |         |        |           |
| Muire na Dea Coirle Infants            | Mourne Road Drimnagh          | 1.8                          | Infants | Mixed  | 181       |
| Muire na Dea Coirle Girls              | Mourne Road Drimnagh          | 1.8                          | Primary | Girls  | 160       |
| Muire Og, Loreto Convent               | Crumlin Road, Crumlin         | 2.2                          | Primary | Mixed  | 229       |
| Our Lady of Assumption Boys NS         | Walkinstown                   | 0.1                          | Primary | Boys   | 205       |
| Our Lady of Assumption Girls NS        | Walkinstown                   | 0.1                          | Primary | Girls  | 205       |
| Our Lady of Good Counsel Infant School | Mourne Rd Drimnagh            | 1.8                          | Infants | Mixed  | 181       |
| Our Lady of Good Counsel GNS           | Mourne Rd Drimnagh            | 1.8                          | Primary | Mixed  | 160       |
| Our Lady of Good Counsel BNS           | Mourne Rd Drimnagh            | 1.8                          | Primary | Boys   | 160       |
| Our Lady of the Wayside NS             | Bluebell Road, Bluebell       | 0.2                          | Primary | Mixed  | 112       |
| Our Lady's Hospital School             | Hospital Crumlin              | 1.1                          | Primary | Mixed  | 46        |
| Scoil Colm CBS                         | Armagh Road, Crumlin          | 2.6                          | Primary | Boys   | 151       |
| Drimnagh Castle CBS                    | Long Mile Road                | 0                            | Primary | Boys   | 423       |
| Scoil Eoin                             | Armagh Road, Crumlin          | 2.6                          | Primary | Mixed  | 130       |
| Soil Náisiúnta Muire Gan Smal B        | Tyrconnell Rd Inchicore       | 1                            | Primary | Mixed  | 299       |
| St. Cillian's                          | Robinhood Road, Bluebell      | 0.2                          | Primary | Mixed  | 21        |
| St. Damien's NS                        | Beechfield Close, Walkinstown | 1.9                          | Primary | Mixed  | 244       |
| St. Agnes                              | Armagh Road                   | 2.6                          | Primary | Mixed  | 281       |
| Scoil Iosagain                         | Aughvannagh Road, Crumlin     | 3.7                          | Primary | Boys   | 106       |
| Our Lady of Lourdes                    | Goldenbridge                  | 1.8                          | Primary | Mixed  | 260       |

Source: [www.schooldays.ie](http://www.schooldays.ie) and [education.ie](http://education.ie)

| Name                   | Location                    | Distance from Plan Area (km) | Type              | Gender | Enrolment |
|------------------------|-----------------------------|------------------------------|-------------------|--------|-----------|
| SECONDARY              |                             |                              |                   |        |           |
| Ardscoil Eanna         | Crumlin Rd                  | 1.7                          | Secondary         | Girls  | 42        |
| Ardscoil Eanna         | Crumlin Rd                  | 1.7                          | Secondary         | Boys   | 46        |
| Mercy Secondary School | Goldenbridge Inchicore      | 1.8                          | Secondary         | Girls  | 166       |
| Rosary College         | Armagh Road, Crumlin        | 2.6                          | Secondary         | Mixed  | 205       |
| Our Lady of Assumption | Long Mile Road              | 0.1                          | Secondary         | Mixed  | 360       |
| Our Lady of Mercy      | Mourne Road, Drimnagh       | 1.8                          | Secondary         | Mixed  | 307       |
| Drimnagh Castle CBS    | Long Mile Road Drimnagh     | 0                            | Secondary         | Boys   | 671       |
| Kylemore College       | Kylemore Road, Ballyfermot  | 1.5                          | Secondary courses | Mixed  | 345       |
| Greenhills College     | Limekiln Avenue, Greenhills | 3.0                          | Secondary courses | Mixed  | 515       |
| St. Paul's             | Walkinstown                 | 3.4                          | Secondary         | Girls  | 762       |

**Table: Existing Schools in the Plan Area and Environs**

Within the plan area itself there is a boys' secondary and a boys' primary school (Drimnagh Castle CBS) along the Long Mile Road, while directly opposite, and just outside the plan boundary, are a girls' secondary and primary school (Our Lady of Assumption). There is a small primary school directly adjoining the plan area to the west along Robinhood Road. Within an approximate 3 kilometre radius of the LAP area there is total of 10 secondary schools and 19 primary schools.

In terms of childcare, the south central area of the city in general is lacking affordable childcare spaces. The Dublin City Childcare Committee Audit and Needs Analysis (2006) found that this LAP area (EDs of Walkinstown A and Inchicore B) and its surrounds are poorly served by childcare facilities, particularly affordable and high quality facilities for babies as well as after-school care and summer projects. Pre-school services situated in the grounds of national schools in the wider area are understood to be at full capacity, there is no after-school childcare provision in the entire area, and there are very few childcare spaces for babies in the area.



In consultation with the City Childcare Committee it has been found that there are currently two childcare services within the LAP boundaries, located within the recently developed Lansdowne Gate mixed-use scheme on the Long Mile Road and within the Landowne Valley apartment development.

There are three other childcare services just outside the LAP boundary, all privately run :

1. A new sessional service catering for pre-school children in the Bluebell Community Centre. This is not operating at full capacity with 7 spaces available out of a total of 10.
2. A sessional service based in the grounds of the Assumption school. They have a total of 40 spaces with available capacity in the afternoon (20 sessional spaces available)
3. A sessional service with a total of 30 sessional spaces. It is not operating at capacity with 14 sessional spaces filled out of 16 available.

There are 120 sessional pre-school spaces available in these pre-school services just outside of the boundary area, of which 43 spaces (36%) are not currently filled. This suggests an over-provision of sessional pre-school care in the area. There is, however, very little provision in the plan and wider area for babies and no provision for after school spaces in the area. Those services that are close to, or within the boundary of the LAP, do not provide spaces for these age groups.

The Drimnagh IAP refers to a draft report undertaken by the KWCD which found a need for childcare for all ages in the wider area and especially in Crumlin and Drimnagh as did The Childcare Service Audit and Needs Analysis (2006)



### 2.1.6.3 Community/social/cultural facilities

The plan area does not provide a strong focal point for the community due to the fact that it is largely industrial. Just outside of the plan area to the north however there is a new purpose built community facility serving the Bluebell residential community and surrounding districts. This is an integrated facility providing for a range of community needs across all age groups. The facility includes a community hall, changing rooms, community offices and youth facilities serving both the adjacent football pitch and hall. At first floor level there are multi-purpose seminar and meeting rooms.

The wider area has low levels of cultural facilities (such as a theatre or event spaces), yet there is a rich cultural legacy of musicians and playwrights in the wider area and an active involvement of the community in organic arts and cultural activities on a part-time or amateur basis, as emerged during the consultation phases for the Drimnagh IAP and Naas Road Strategic Plan.

In this context, there are local cultural groups in the wider area, including two dance schools, a drama group, a musical society, an arts development charity and a theatre workshop group in Ballyfermot. The arts and development charity, based in Inchicore, specialises in developing initiatives that utilise the arts to promote socially inclusive urban development. The Drimnagh Arts & Recreation Festival, now an annual event, also plays an important role in making culture accessible to local communities.

The provision of 50 artist's studios in the Jamestown Studios at the Factory in Inchicore, provides much needed space for artists in the city. Nonetheless, despite such active involvement and positive initiatives at local level, there appears to be a lack of physical infrastructure and facilities.

#### • Libraries

There is a library service in the area, but it is of a mobile nature and therefore available only on a temporary basis, branch library buildings being in Ballyfermot, Inchicore and Walkinstown. There is also little in terms of cultural infrastructure to support artistic events or cultural initiatives at the local level. There are a number of outdoor active recreational facilities in the plan area .



#### • Healthcare

The wider environs area includes a number of health care facilities with six primary health care centres serving local communities and two national hospitals within a 5km radius (Coombe Hospital and Crumlin Hospital).

In 2011, the Bluebell Inchicore Community Health Forum commissioned a report – *Bluebell and Inchicore: Priority Health Needs, June 2011* – to assess the priority health needs of the local population, to identify the main health concerns in the area and to establish a picture of the barriers that prevent access to healthcare. This report covers the areas of Bluebell, Inchicore and Kilmainham. Part of the Naas Road Lands LAP area falls within the geographical area covered in the report. The report recommended that a strategy be developed for the area which would provide for an opportunity to look at health in a more holistic way and identified a number of needs for the local area. These include the following ;

- An 'Alternative Health Space' in the new Health Centre in Inchicore
- A Health Space in the new youth and community centre in Bluebell
- A supportive space for disabled people to meet
- New and safe play areas that are child focused and monitored for vandalism
- The renovation and making safe of older play areas
- A methadone clinic and alcoholism treatment clinic
- Urgent improvement of local transport, particularly to older and disabled residents
- A GP service in Bluebell and appropriate satellite clinics.

### 2.1.6.4 Passive Amenity & Open Space

The Naas Road Strategic Plan and Drimnagh IAP research preparation revealed a strong sporting tradition in the extended area . Sporting activities such as soccer, hockey, rugby, gaelic games and pitch and putt are all supported yet there is a lack of support infrastructure such as changing rooms and clubhouses. There is also evidence to suggest that sporting clubs experience considerable difficulty in finding suitable grounds to base themselves and that there are insufficient indoor facilities.

Amenities including the Camac river, Lansdowne Valley, Walkinstown Park and Drimnagh Castle are somewhat disconnected from each other, and the major recreational spaces have not reached their full potential as a result. The Drimnagh IAP (2008) recommended that Lansdowne Valley Park and Drimnagh Castle be rejuvenated and utilised to link existing development and proposed development. The Grand Canal is a major amenity asset but generally under-used at present.



2.1.6.5 Local Retail

Retail and convenience shopping facilities are largely restricted to petrol station forecourt shops, two discount food stores (Lidl and Aldi) and a strip of local neighbourhood retail facilities along Long Mile Road, whilst local services are mainly limited to a fast-food outlet, public houses, a hotel and a leisure centre. The Royal Liver Retail Park contains some comparison shopping and retail warehousing.

The Naas Road Lands Strategic Plan and the Drimnagh IAP have revealed a deficit of supermarkets and other retail services, banking and ATM facilities, cafes, wine bars, restaurants, etc in the plan and wider area with residents having to travel outside the area for almost all retail purchases. The Ashleaf centre, Crumlin shopping centre, Superquinn on Walkinstown Road and at Sundrive Road would be the main shopping facilities utilised by residents of the area.

2.2 Character Appraisal

2.2.1 Current character

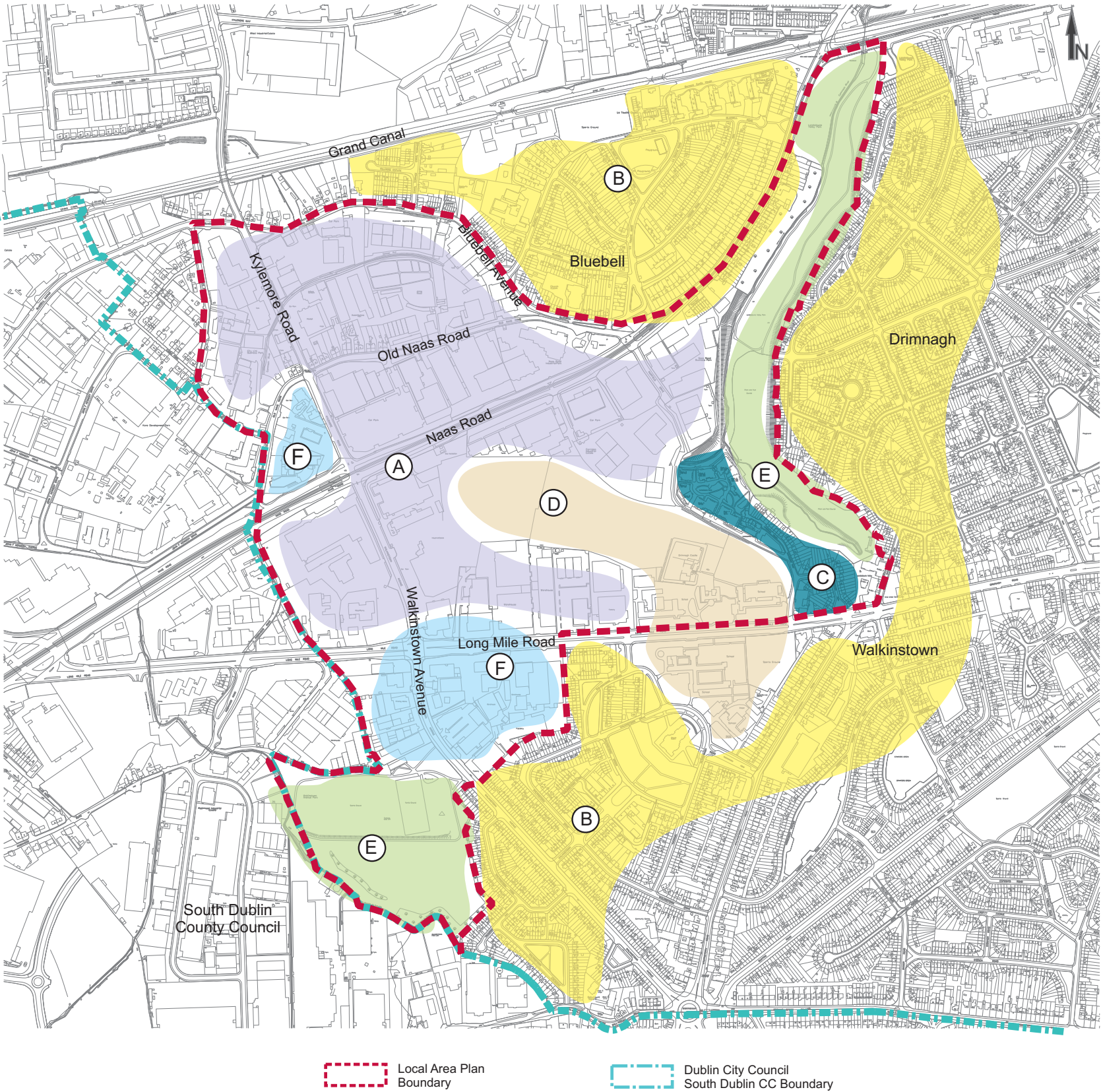
The existing land-use zonings reflect the character of the area in distinguishing between areas which are primarily industrial, residential or open space. The main vehicular routes, particularly the N7 ( Naas Road) and Long Mile Road are heavily trafficked, contribute to the busy character of the area and create demand for industrial and office uses. Whilst Z6 areas are established industrial lands, the more centrally positioned Z14 areas include many land-extensive uses and brownfield sites which may be more suited to redevelopment. A pocket of institutional uses on the Long Mile road sits between the industrial and residential lands, while swathes of amenity open space mark the northeastern and southwestern limits of the area - serving adjoining residential areas at Walkinstown and Drimnagh. The historic development of the area is reflected in protected structures positioned at Naas Road, Bluebell and Drimnagh Castle.

In appraising the character of the Naas Road area in its current form, five distinct types can be defined. These are:

- A- Industrial and car based uses, land extensive and under utilised areas;
- B- Established residential communities, consisting of mainly houses;
- C- Newer residential areas with a mix of apartments;
- D- Community facilities including schools and heritage;
- E- Parkland;
- F- Local Retail, cafes and showrooms.

It is the intent of the LAP that the attractive and vibrant qualities of these areas can be built on and where the quality of the area is poor (such as in A) that a new character for the area can be developed, linking into the stronger character areas adjoining.

Map 2.5 Current Land Use





## 2.2.2 Key Sites

The strategic development regeneration area (SDRA) policy for Naas Road states to 'Seek innovative design responses for key sites (collectively & individually) that respond to the environmental, social, cultural and economic issues and demands facing the plan area'. The successful implementation of the LAP depends on the successful comprehensive redevelopment of key sites both in terms of initial design and uses over the long term. These sites are identified as:

- a) Royal Liver Retail Park,
- b) Motor Distributors Ltd site (Volkswagen Factory)
- c) Nissan Plant Site, and
- d) Site at Muirfield Drive/Naas Road

The development of these is pivotal in regenerating the area, and because they have the same zoning, there is an opportunity for co-ordinated delivery of LAP objectives and the creation of a large area with a distinctly urban mixed use character.

**Royal Liver Retail Park** ; This is characterised by large low level retail warehouse type units positioned around a central surface car parking area which is open to view from public streets.

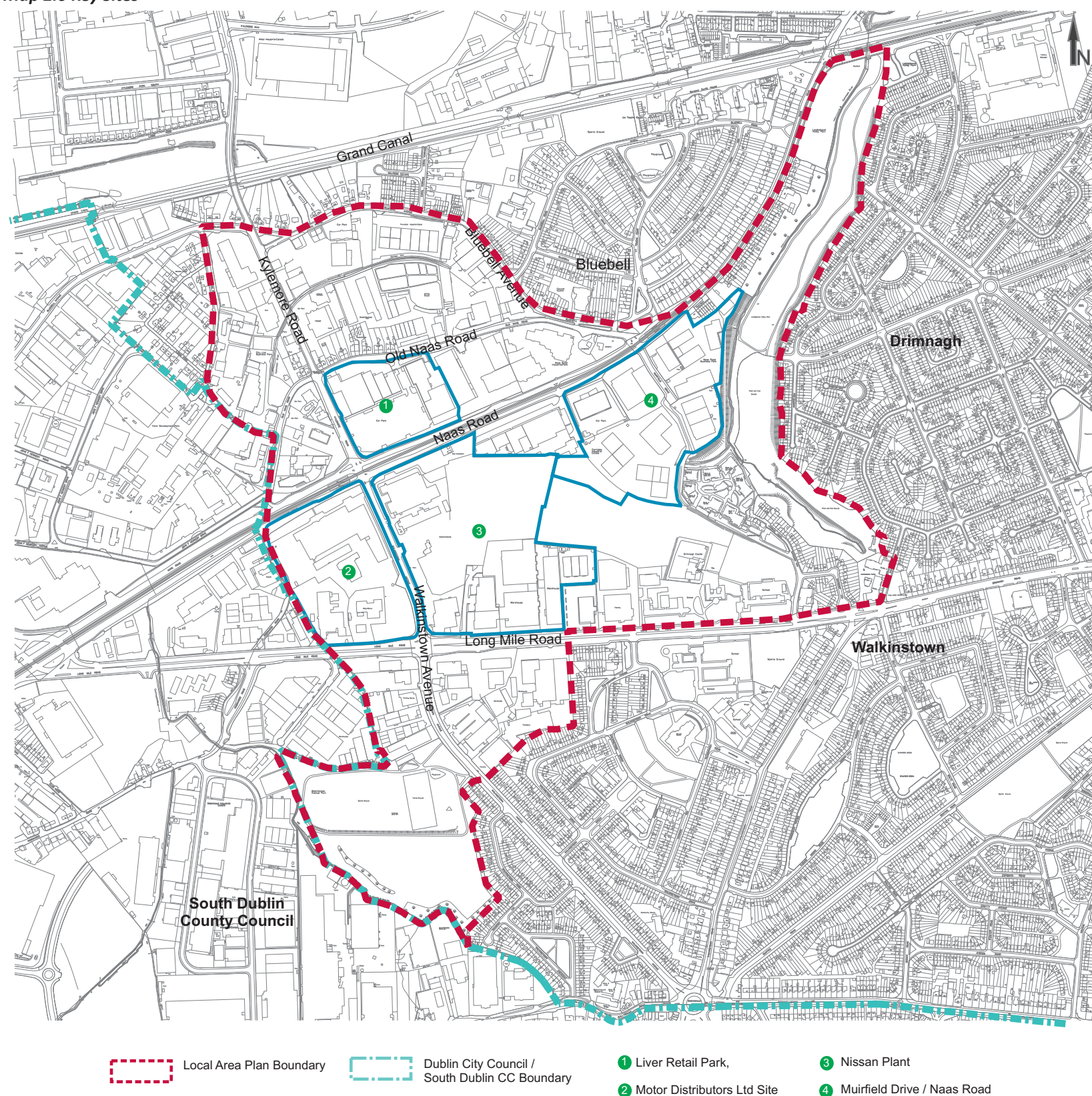
**Nissan Site**: Car-based industrial in character with large units fronting streets. This site has restricted permeability, and includes a large area of hard surfacing. Buildings in the vicinity of electricity cables which traverse the site are of low height.

**Motor Distributors/ Volkswagen Factory**; Similar land uses to the above with the exception of a visually distinctive protected structure on the northern side of the site. This is surrounded by attractive mature landscaping.

**Muirfield Drive/Naas Road site** ; These are industrial lands which include light industrial buildings, large warehouse-type units and offices (particularly onto Naas Road). The Camac river flows along the southwestern boundary through Lansdowne Valley park.



Map 2.6 Key Sites





# Chapter 3 Vision

The vision for the Naas Road lands 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 the area.

Future development in the Naas Road lands plan area will be guided by the strategic policy objectives of the Dublin City Development Plan 2011 – 2017 as well as building on the core vision and strategic aims of the Naas Road Lands Strategic Plan (2009).

## 3.1 Guiding principles

Guiding principles for this LAP, and supporting the above vision, are as follows:

### Land-Uses:

- Ensure a land use strategy which capitalises on the area's locational advantages in a sustainable manner, and realises the full potential of the plan lands in light of the plan area's designation as a key development area (KDA), key district centre (KDC), a strategic development and regeneration area (SDRA) as well as its location along the Naas Road-Rail innovation corridor.
- Support the sustainable development of the plan area as a strong spatial hub, performing an important regeneration role for the surrounding local communities and providing for a sustainable mix of new employment, residential, retail, leisure, cultural and community uses. A strong retail emphasis shall be focused on the KDC core.
- Promote and facilitate economic development and clustering along the Naas Road – Rail innovation corridor on a coordinated basis with the adjoining local authority, South Dublin County Council

*Note: While the focus of the LAP will remain on long-term uses, it is recognised that in the interim period suitable temporary uses can be beneficial for the area, adding to the vitality of local businesses and communities. Any approach to interim uses will require attention to phasing mechanisms with regard to achieving the longer term aims of this plan.*

### General Design/Layout:

- Create connectivity throughout the plan area and link with the surrounding environment by removing barriers to pedestrian and cyclist movements, opening up attractive links between the plan area and those neighbourhoods surrounding and facilitating gradual integration of the plan area into the existing urban fabric of the city.
- Create more active streets to a planned urban design and that are attractive to businesses and retailing.
- Seek to protect, maintain and enhance the green infrastructure of the area, and use the green infrastructure network as a framework to reduce the size of land blocks and create a new diverse character area.
- Facilitate the plan area's role as a 'gateway to the city', creating an opportunity to strengthen the city's visual identity and signal the entrance to the city .
- Use existing and proposed infrastructure to establish a strong and interactive relationship with Dublin city and the wider environment.

### Detailed Design:

- Seek innovative design responses for key sites (collectively and individually) that respond to the environmental, social, cultural and economic issues and demands facing the plan area. Quality contemporary design and finer urban grain will be encouraged and incorporated into masterplans for key sites.
- Ensure a mix of residential typologies at an appropriate density to ensure the viability of public transport and other supporting social facilities within a high quality living environment and with attractive employment and amenity spaces and provide for a range of accommodation for all age groups and family types.
- Promote high environmental standards and energy performance at a practical level in the plan area through appropriate planning and design of all developments

*Note: Development management guidance set out in this LAP should be read in conjunction with the relevant chapters of the city development plan.*





## Chapter 4 : LAP Development Strategy

### 4.1 Introduction

The overall strategy for the Naas Road lands plan area is to redefine the area's identity by regenerating the underutilised lands within the LAP area to create a sustainable, integrated mixed use environment which maximises the LAP area's locational advantages. This regeneration will increase the levels of employment within the area, provide new residential areas close to town and well served by public transport, providing new local services including retail.

It will be characterised by increased street level activity addressing an upgraded visual environment with new land uses and services. It seeks to deliver improved integration with the surrounding communities both by way of increased access to public transport connections and new pedestrian and cycle routes.

A central element in the shaping of the LAP strategy is the creation of new green routes through the area, both as new green boulevards, green cycle and pedestrian connections and also the upgrading of existing roads to increase their attractiveness. This linking of the area through a green infrastructure network will capitalise on the assets that exist within and surrounding the LAP area, including the Lansdowne Valley, the Grand Canal, Bluebell Cemetery and Drimnagh Castle, linking them into this network and framing the regeneration around a sustainable development model.





## 4.2 Land-Use Strategy

**To promote regeneration of this SDRA through the creation of a quality mixed use environment. This shall be focused primarily on Z14 (regeneration) zoned lands and extending to adjoining Z6 (employment) lands.**

This land use strategy for the Naas Road lands aims to build on the objectives of the Naas Road SDRA as set out in the development plan, strengthening the urban character of the area with a variety of land uses but focused mainly on the Z14 area in regard to significant redevelopment of mixed uses. Within this context, site briefs for key sites are detailed in Chapter 5.

Having regard to the current economic climate and the slow pace of redevelopment at present, this strategy takes a medium to long-term timeframe of 5-20 years and possibly beyond. As such it is recognised that not all of the objectives within the LAP will be realised during the lifetime of this plan. The LAP seeks to set out a long term template of connections and urban form which will shape development during the lifetime of the plan and also inform future plans for the area, putting in train a process of regeneration that will bring benefits and renewal to this area of the city.

### 4.2.1 Shaping the LAP Land Use Strategy

In shaping a land use strategy for the LAP, a number of key elements informed the approach taken. The first element in shaping the approach is the development plan – including the core strategy, the policies identified for this area and also the zoning designations. A second key element is the Flood Risk Assessment undertaken for the LAP area, which identified areas of land which are vulnerable to flooding. These areas are, for the lifetime of this LAP, more appropriate for accommodating uses that are flood resilient; until, a strategic long term solution to the flood risk in this area is found.

A third informing element is the current SEVESO uses located within South Dublin County Council to the north east of the LAP Area. These are uses where certain chemicals and/or gases are stored, and the range of uses located within a designated distance of these sites are restricted for health and safety reasons. Until these uses change or relocate, the extent of intensification of uses beside SEVESO locations will be limited.

A fourth element is the Economic Development Action Plan for the Dublin City Region which identifies the Naas Road as lying within one of three economic corridors of the Dublin region.

In considering these in totality, the land use approach for the Naas Road aims to provide a balance of mixed uses, with the commercial heart focused between the Naas Road and Long Mile Road on Walkinstown Avenue, with enterprise uses located north of the Naas Road and along Long Mile Road.

Residential and community uses are proposed within the key sites, avoiding significant areas of residential fronting onto heavily trafficked routes. These residential uses would be approximate to existing community facilities (such as parks and schools) and to surrounding existing communities.

The Strategic Environmental Assessment (SEA) and the Appropriate Assessment (AA) were key elements in informing the plan. These environmental assessments were carried out in tandem with the plan and ensured full integration and consideration of the significant environmental issues during the plan-making process. This represents a further repetition of environmental assessment at local area plan level, given that the higher level city development plan and the regional planning guidelines have also been subject to separate SEA and AA processes.

### 4.2.2 Development Plan Zoning and Designations

The existing zoning of the area by the current City Development Plan includes employment uses (Z6) institutional uses (Z15), residential uses (Z1) and amenity open spaces (Z9). The core area for regeneration is Zoned Z14 which states 'to seek the social, economic and physical development or rejuvenation of an area with mixed use of which residential and 'Z6' would be the predominant uses.' These lands include key sites for which briefs are prepared in this plan.

Within the Z14 lands lies the KDA, with the KDC forming the hub. This zoning directly informs the land uses sought to reflect the role of KDC's as top-tier urban centres outside the city centre. Land uses in the Z4 zoning category can be considered for the KDC area in accordance with the development plan "Z14" zoning objectives. This allows for a variety of mixed service facilities including higher order services such as district level shopping facilities.

### 4.2.3 Land Use Strategy

This land use strategy seeks the following:

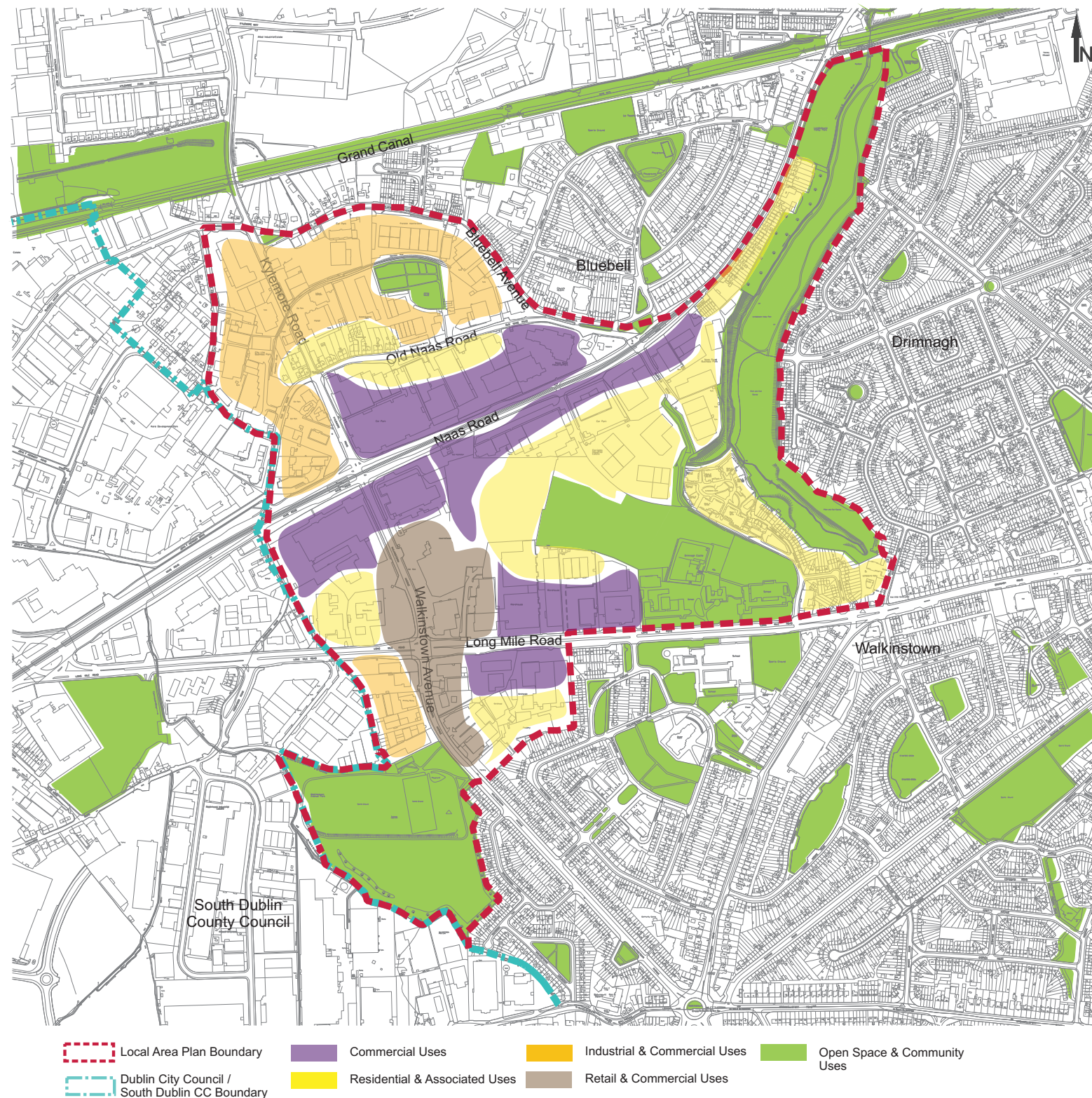
- to support employment uses and to facilitate sustainable redevelopment of lands zoned Z6, including provision for Z4 uses within the KDC boundary.
- to protect existing residential amenities of Z1 lands to improve integration of development lands and amenity spaces via the green infrastructure strategy.
- to provide for institutional uses as per the Z15 zoning objective.
- to encourage new residential development as part of planned mixed-use areas and subject to amenity considerations.
- to seek the enhancement of open spaces (Z9) and amenities and connectivity to same.
- to allow for community and cultural uses/services to serve populations of the LAP and surrounding area.

The land use strategy map overleaf sets out the general shape of the land use mix proposed for the LAP area. Reference should also be made to Chapter 5 which provides greater detail on the key sites within the LAP. The land use strategy map should be read as indicative, and masterplans submitted at application stage will demonstrate how land uses within the site support the policy approach set out in this LAP.





**Map 4.1 Proposed Land Use Strategy**



The form of development sought in relation to the various land uses proposed is detailed below.

- **Mixed uses and active streets**  
KDC lands are considered suitable to the delivery of mixed uses and services. Particularly suitable is the KDC core area – focused in between the Naas Road and Long Mile Road, Hence this area can accommodate higher intensity uses framing new public spaces. Within all mixed use areas, the inter-relationship of different uses is an important consideration.

Ground floor uses onto public areas should be active uses which assist in revitalising the area, contributing positively to public realm and designed to a fine urban grain. Examples include shops, cafes, restaurants, and cultural uses, and main entrances to employment uses. Improved connectivity through large key sites will encourage the development of quality thoroughfares.

- **Employment Uses**  
The plan area has considerable capacity to develop the existing range of employment uses. Z6 lands remain a significant zoning, and employment uses will also be an integral part of the redevelopment of the KDC area – which can accommodate new employment uses such as retail, office and high tech research/lab/enterprise buildings. The LAP seeks to create an attractive environment for employers and their staff, through attractive settings for employment locations and a range of local services available to staff alongside high quality connectivity.

- **Residential uses**  
The location and design of residential elements within mixed use schemes should be thought through in planning terms, such that residential amenity is given due consideration and disamenity from adjoining uses minimised. Residential uses at ground floor level onto busy streets shall be discouraged due to disamenity associated with noise and poor air quality. Dublin City Council shall however encourage residential development on more secluded areas of sites and on upper floors. A good variety of house types will be encouraged to create choice and diversity. Schemes should be designed to address their future management, and provide access routes that can be taken in charge.

- **The KDC - quantum of development**  
The 2009 strategic plan adopted by Dublin City Council recommended a 'High Density Option with Mixed Industrial / Commercial Land Use (low to mid rise) along Naas and Long Mile Road as the preferred development strategy specifying quantum of development proposed for the KDC over a 10 to 15 year period<sup>1</sup>. It planned a total of 698,000 sq.m floor area over this year period. These figures have now been re-evaluated with regard to the changing economic climate.

<sup>1</sup> It would appear that there is a typographical error in the Strategic Plan (2009) whereupon the preferred residential and industrial figures have been inadvertently switched



It is considered now that 480,000 sq.m. of mixed-use development can be accommodated in this plan area - but over a longer-term timeline of 15 – 20+ years. Over the six year lifetime of the LAP, it is anticipated that redevelopment of sites will be relatively slow. It is expected that up to 25% of the total floor space will be built over the six year time span of the local area plan.

| Land-use      | Short Term – Lifetime of the LAP | Medium Term (10yr) | Long Term (15 - 20yr+) |
|---------------|----------------------------------|--------------------|------------------------|
| Retail*       | 15,000                           | 25,000             | 35,000                 |
| Community     | 2,500                            | 6,000              | 10,000                 |
| Commercial    | 40,000                           | 120,000            | 200,000                |
| Industrial    | 12,500                           | 32,000             | 50,000                 |
| Residential** | 50,000                           | 125,000            | 200,000                |
| Total         | 120,000                          | 308,000            | 495,000                |

Quantum of Landuses Proposed in the KDC over 10 to 20+ years under this LAP

\* Net Floor Area

\*\* The figures shown are approximate with detailed design, site availability and demand ultimately determining the volume of residential units completed in each period.

Of the maximum of 35,000 sq.m. retail space planned for, 5,000 sq.m. of this will be accounted for in relation to existing retail provision and also the addition of local shops outside of the KDC core to serve local need. The two main sites impacted by the KDC (MDL and Nissan)- can provide up to 25,000 sq.m of new retail over the short and medium term. (See Chapter 5 for detail on each site). The remaining 5,000 has not been allocated within this LAP as this LAP will most likely have reached review stage prior to this level of retail demand arising. As part of a review of this LAP a detailed analysis of the scale of additional retail demand, (including population growth), should take place so that any need for further retail is identified. If the demand merits development up to 35,000 this could be either accommodated in the redevelopment of lands in the KDC south of the Long Mile Road and/or in additional phases/extensions within the major sites.

• **KDC Core**

The 2009 strategic plan identified a number of key sites south of the Naas Road and east and west of Walkinstown Avenue, as having the most potential to be developed as a mixed-use core at the centre of the KDC. This area includes the Motor Distributors site on the western side of Walkinstown Avenue with extensive frontages onto the Naas Road and Walkinstown Avenue, and the Nissan car-dealership on the eastern side of Walkinstown Avenue and the Naas Road also with extensive frontages onto these carriageways. This approach remains appropriate having regard to constraints and opportunities for access.

The LAP focuses the KDC core in an area between the new boulevard connection and around the junction of the Long Mile Road with Walkinstown Avenue, to create a mixed use hub providing a mix of retail, local services and leisure uses and employment facilities. ( See Chapter 5 for details )

Notwithstanding the geographic extent of the KDC designation, the scale of any mixed services, larger retail units or high traffic generating uses may be restricted on any KDC lands positioned north of the Naas road and on lands zoned Z6. This is because of more limited traffic capacity and access arrangements in these areas. The scale of any services in this area should not compromise the delivery of higher order services at the KDC core.

**Land Use Policies**

**LUS1.**To establish new and appropriate land-uses that support a thriving employment and residential hub in recognition of the strategic nature of the plan area as a key developing area, key district centre, Strategic Development and Regeneration Area, a gateway to the city and its location along the Naas Road / Rail trans-boundary innovation corridor.

**LUS2.**To develop a vibrant mixed-use core between the Old Naas Road and Long Mile Road, along Walkinstown Avenue and Kylemore Road and adjoining sites. This shall reinforce this location as a key district centre, with retail, commercial and residential as the dominant land-uses.

**Land Use Objectives**

**LUSO1.** In support of the KDC, to encourage a core of mixed uses including higher order retailing in the specified KDC core positioned between Naas Road and Long Mile Road incorporating quality public realm along new access routes.

**LUSO2.** To promote investment, economic and employment growth in the area through the attraction of commercial office development within the KDC along the main transport routes, whilst supporting existing industrial enterprise and employment uses on Z6 lands.

**LUSO3.** To develop a new sustainable neighbourhood inclusive of residential development at sustainable densities, underpinned by quality social infrastructure all within a high quality public domain.

*(Note: The development of lands for all uses are subject to normal constraints and development plan policies and objectives including inter alia, flood risk assessment, Seveso implications, wayleaves, residential standards and traffic analysis.)*



### 4.3 Economic Development and Employment

#### 4.3.1 Introduction.

**To promote economic development and employment creation as part of a mixed use approach to redeveloping the Naas Road lands, with a particular focus on new integrated development on lands within the KDC.**

Positioned in Dublin’s western industrial belt, the Naas Road lands contain long-established industrial uses which employ staff from the local and wider area. The lands are contiguous with similar industrial lands at Robinhood Industrial Estate and the wider Ballymount area in South Dublin County Council area. The newer ‘Park West’ area, positioned further northwest, encompasses both light industrial uses and office complexes. This section aims to build upon development plan policy/objectives relating to economic development of the Naas road lands, to realise the employment potential of the area.

#### 4.3.2 KDC and Innovation Corridor.

##### KDC

The KDC designation creates an opportunity for the emergence of a critical mass of commercial, retail and residential development which in turn will enhance the viability of potential retail units and the creation of a vibrant mixed-use core as an important precursor for the attraction of office and other employment functions to the area. It is a key objective of this LAP to ensure that the Naas Road lands fulfil this function and provide a comprehensive range of high quality commercial, retail and community services for local residents and businesses, as well as the existing communities surrounding the plan area. These shall include the existing and new communities planned for in the administrative area of South Dublin County Council as envisaged under the Naas Road Development Framework (2010).

##### Innovation Corridor

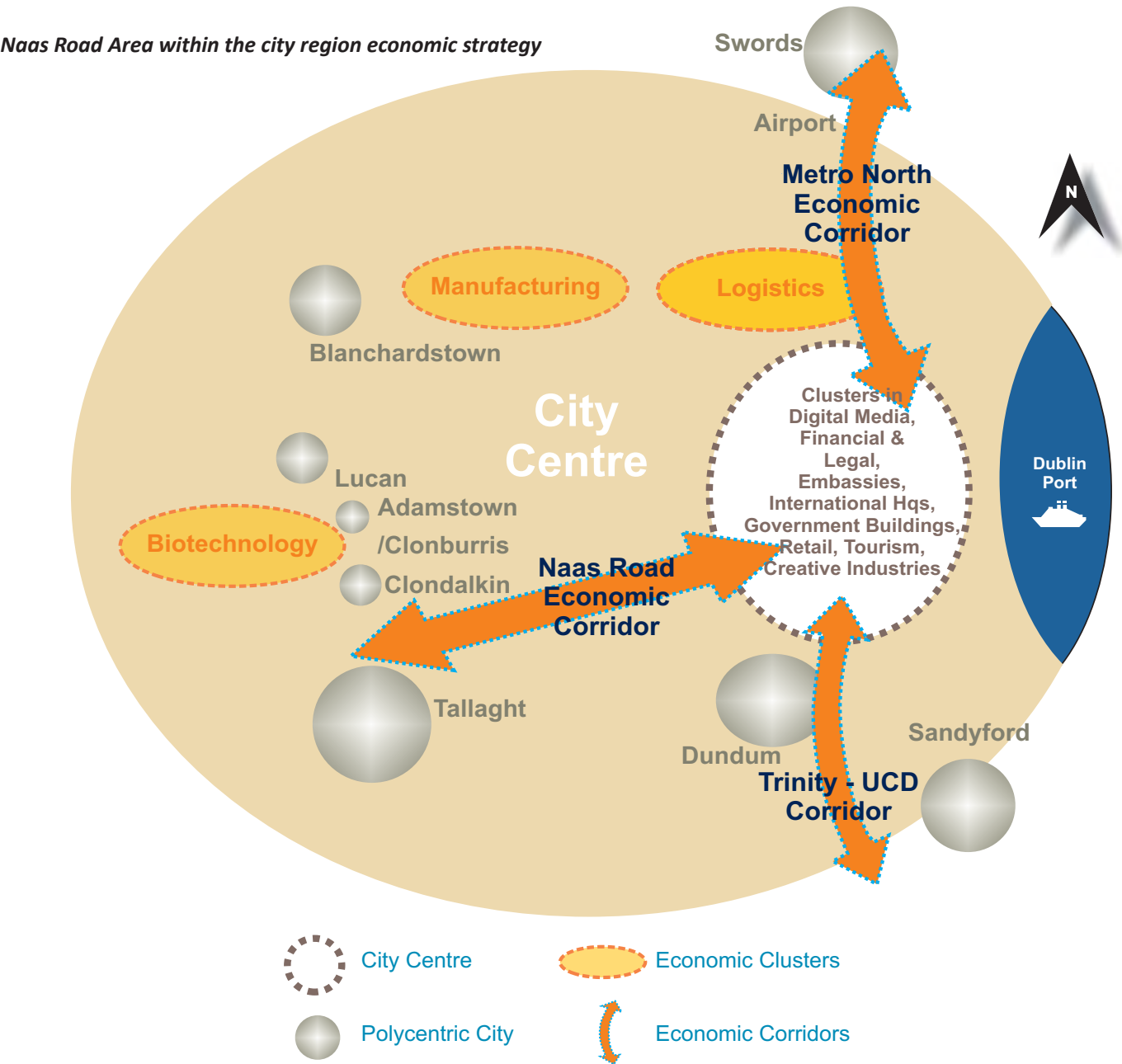
The Economic Development Action Plan for the Dublin City Region was launched in 2010 .Three economic corridors have been identified in this document, including the Naas Road – Rail Corridor. This corridor spans both Dublin City Council’s and South Dublin County Council’s administrative areas, running westwards from Heuston and including the Digital Hub, St. James’ Hospital, Parkwest/Cherry Orchard, the Naas Road Developing Area and incorporating new urban areas such as Adamstown .

Relevant objectives in city development plan include:

**REO10** To work with the other Dublin local authorities to further develop the practical application of the concept of economic corridors and clustering

**REO11** To identify and map the existing and potential clusters in the city region and identify effective supports to optimise the clustering benefits

Given the relatively lower land and property rental costs here, it is considered that the area is ideal for sectoral clustering, particularly in those growth sector areas of biotechnology, digital industries, clean/green technologies etc. Such uses could be provided in areas outside of the KDC and commercial cores but within the Z6 and Z14 areas along the Naas Road, Longmile Road and Old Naas Road.





4.3.3 Retail & Commercial Uses

The retail strategy for Dublin city designates lands at the Naas Road as a Level 3 District Centre in accordance with the Retail Planning Strategy for the Greater Dublin Area 2008 – 2016. A Level 3 District Centre corresponds with a ‘District Centre’ in the development plan – which provides for an overall level of circa 35,000 sq.m of net retail floorspace provision within the wider KDC environs. This would cater for the future population needs in the functional areas of both Dublin City Council and South Dublin County Council having regard to the need for a co-ordinated transboundary approach as advocated under the Retail Strategy for the Greater Dublin Area.

Over the timeframe of the plan for the Naas Road Lands, a phased approach will be taken, allowing for up to a maximum of 35,000 retail floor space over a 15-20 year time frame. As there is strong demand for a large anchor foodstore in the plan area, this could be accommodated.

| Development Plan                                                                                                                  | Lifetime of the LAP | 15 - 20 yr+ timeframe                              |
|-----------------------------------------------------------------------------------------------------------------------------------|---------------------|----------------------------------------------------|
| Requirement for 35,000sq.m net in South Dublin County Council and Dublin City Council by 2018. (inclusive of non-retail services) | 15,000 sq.m. net    | 35,000 sq.m. net inclusive of non-retail services. |

Retail Floorspace

The majority of this new retail will be for convenience goods alongside household goods/showrooms, rather than being comparison-focused. Any substantial extension of retail beyond the indicative boundaries of the mixed use and into the designated commercial and other use areas will only be considered in the context of a detailed retail assessment, and notwithstanding any conclusions of the retail assessment, would not result in the provision of more than 35,000 sq.m of retail floorspace within the designated key district centre.

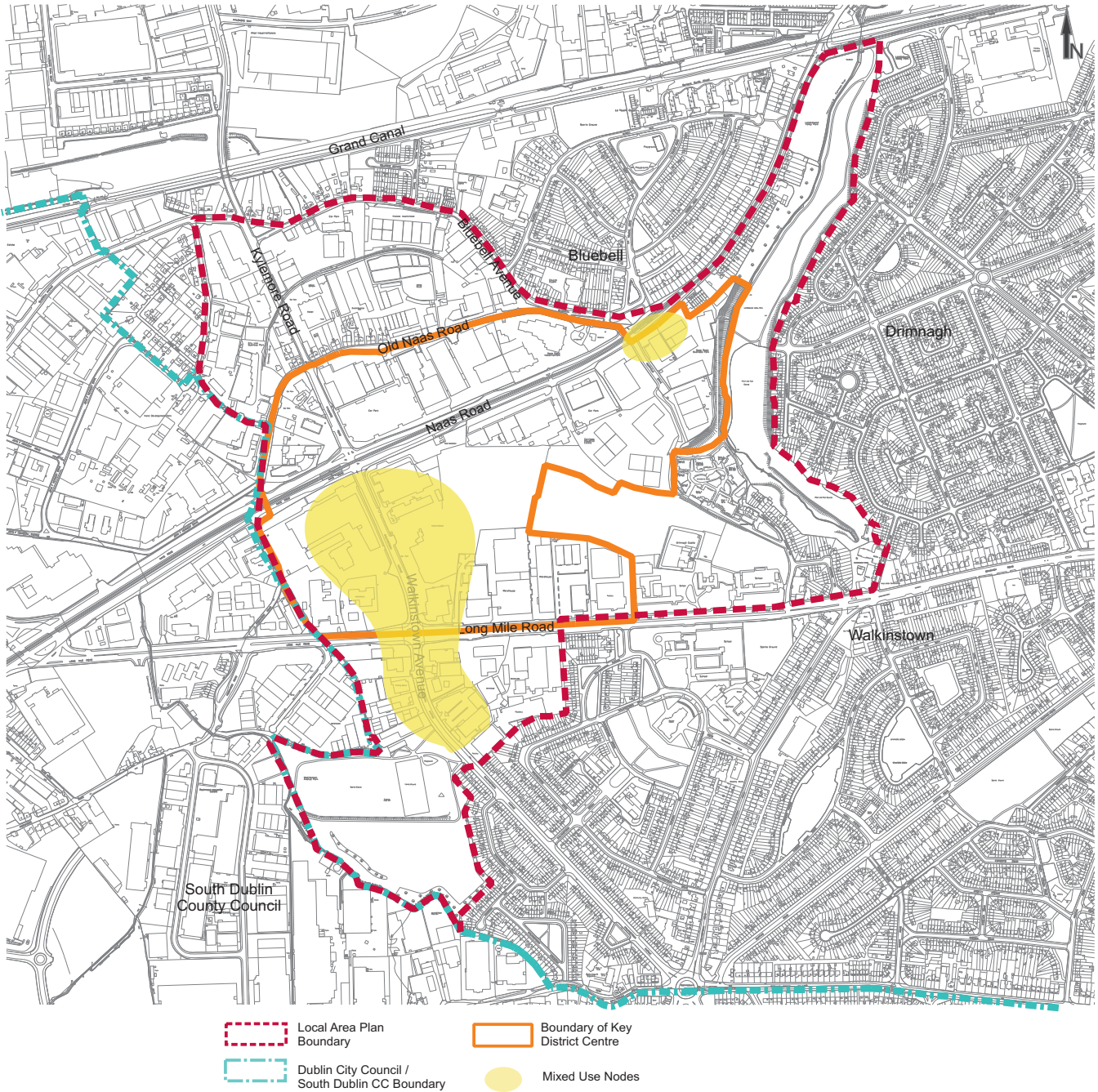
Any proposed development will have to clearly demonstrate that it will not hinder or detract from the provision and development of an integrated and compact retail core in this plan area. Within the lifetime of the plan, delivery of floorspace will be such that no single use is overly-dominant such that it would conflict with the delivery of other policies in this plan (for example, a retail anchor utilising the vast majority of their site specific retail provision may preclude or severely restrict active ground floor uses onto public areas). The approach must therefore demonstrate adequate balance – and a range of smaller units.

It is acknowledged that there is potential and need for the provision of small scale retail and services within commercial lands outside of the main retail core and in close proximity to residential areas.

Neighbourhood-scale activities will be encouraged in areas with good links for pedestrians and cyclists including on those lands surrounding the existing Lidl development on the eastern site of Walkinstown Avenue and south of the Long Mile Road. These retail services will be of neighbourhood shop-scale and can be provided in conjunction with new residential development throughout the plan area. Because they are land-extensive, retail parks and large-scale warehousing are not a desirable retail format for the plan area .

In order to ensure vibrancy and attractiveness certain non-retail uses will be restricted to protect the retail character of this new KDC; including uses such as off-licences, amusement and casino centres, bookmakers and takeaways. Such uses will be limited in number to preserve the retail character of the KDC, and located away from key junctions and high profile street frontage. The clustering of such uses shall be avoided.

Map 4.2 Mixed Use Nodes in Context





4.3.4 Commercial:

In terms of quantum of development, it is considered appropriate to revise downwards the level of commercial provision as provided for under the former non-statutory strategic plan from 360,000 sq.m to 200,000 sq.m of net commercial floorspace. This approach is taken in the context of the current challenging economic environment and reflects a sustainable level of commercial provision in the short-to-medium term.

| Core Strategy | Lifetime of the LAP | 15 - 20 yr+ timeframe |
|---------------|---------------------|-----------------------|
| 63 ha         | 40,000 sq.m.        | 200,000 sq.m.         |

Commercial Floorspace

Office development with active ground floor uses would be appropriate in the mixed-use core area, whilst it is also suitable to provide for commercial and appropriately designed high-end industrial development on sites adjoining the Naas Road and Kylemore Road.



Commercial Activity in the Area



4.3.5 Light Industry and Enterprise

It is a priority of the plan to intensify employment uses and secure new employment opportunities in the growth sectors such as digital industries close to public transport, science, green technology, medical research and education. There is an opportunity to leverage potential from existing employment nodes which are in relative close proximity and located along the innovation corridor, for example, the Digital Hub, St. James Hospital, Tallaght Hospital, Tallaght IT and the Pharmaceutical Industries at Grangecastle, South Dublin.

Small to medium sized enterprise or start-up incubator units could also be successful in the plan area. Units designed to appear similar in function to office units in a streetscape-style development could enhance the amenity of the area.

It is also an objective to consolidate and upgrade existing light industrial uses, which occur to the north of the plan area (Z6 zoning) in the vicinity of the Grand Canal and the Bluebell community. Proposals for development of these lands provide the opportunity to develop sustainable employment uses and contribute to developing the strategic green network by providing green infrastructure, landscape protection, public open space and sustainable energy solutions. Redevelopment of existing industrial uses should ensure that the employment element on site should be in excess of that on site prior to redevelopment in terms of number employed and/or floor space. Proposals should also be included to enhance environmental amenity where developments have potential to contribute to green infrastructure.

The plan will safeguard against low-employment warehouse style units which would prove to be visually incongruous in relation to planned development/uses, and which may represent a poor return on public transport and infrastructure investment. However, it is recognised that such units may be considered acceptable in exceptional circumstances if it is demonstrated that they are required for certain innovative employment uses, and the above land-use and visual concerns can be overcome. Such units should be located in the least accessible and visible locations of the plan area.

| Development Plan | Lifetime of the LAP | 15 - 20 yr+ timeframe |
|------------------|---------------------|-----------------------|
| 63 ha            | 12,500 sq.m.        | 50,000 sq.m.          |

Industrial Floorspace

In terms of quantum of development, the level of industrial/enterprise provision as provided for under the former non-statutory strategic plan, has been adjusted slightly to take into account of possible flood risk impact on site development, i.e. from 53,000 to 50,000 sq.m. of net light industrial/enterprise floorspace.



Light Industry & Enterprise Activity in the Area



#### 4.3.6 Assessment Criteria to Foster Economic Growth:

The following criteria (set out in chapter 16 of the Dublin City Development Plan 2011 - 2017) will be an integral tool to aid assessments of all strategic developments proposed in the plan area and these questions are therefore relevant to prospective developers ;

1. Does the density, scale and quality of the development optimise the consolidation of the city region?
2. Is there significant regeneration benefit within the area, and/or potential for follow-on development?
3. Does the development maximise the economic return on public investment in infrastructure?
4. Will the development support an existing or create a new tourist attraction within the city region?
5. Does the development support the development of agglomeration economies and clustering?
6. Does the development contribute to the achievement of other strategic objectives for the city region such as enterprise and employment creation?
7. Does it contribute positively to the image and identity of a creative city region?
8. Does it contribute to an enhancement of quality of life?
9. Does it lead to increased market competition in the area?
10. Does it contribute to or increase the competitiveness of the city region?

#### 4.3.7 Interim Strategy

It may be necessary to give consideration to appropriate temporary uses as an interim solution given the extent of under-utilised and vacant lands/buildings in the plan area at present . This approach is in recognition of the potential benefits of appropriate temporary uses such as start-up enterprise units, pop-up shops, cafés, allotments, playing fields or community spaces, all of which have the potential to add vitality to the local neighbourhood and business sector. Hence, the City Council will look positively on temporary uses as interim solutions for substantial sites, derelict or under-utilised sites and vacant buildings.

The council also acknowledges that there will be a need for flexibility in achieving the long-term strategy for the area and in this regard will give consideration to new build proposals which may not accord entirely with the vision for the area but which represent an appropriate short-term option contributing to the vibrancy and / or employment potential of the area.

Notwithstanding the above flexibility, temporary uses or new build proposals must not preclude the realisation of the long-term vision for the plan area. All proposals for interim solutions must demonstrate how they contribute to the vibrancy and / or employment potential of the area as well as safeguarding the integrity of the long-term vision and strategy for the area.

#### Economic Policies

- ED1.** To promote the economic renewal and revitalisation of the Naas Road Lands plan area as a dynamic and sustainable employment cluster in a vibrant mixed-use quarter with a distinct spatial identity.
- ED2.** To foster linkages with existing and emerging employment hubs in the vicinity, including those in South Dublin County Council, developing a critical mass of employment and enterprise clustering as part of the city-region's Naas Road-Rail Innovation Corridor
- ED3.** To promote and enhance the Naas Road Key District Centre as a significant employment centre with a compact mixed-use core by facilitating the required quality and quantity of commercial, retail and enterprise floorspace and encouraging the development of the necessary support facilities such as business services, cafes, shops and leisure facilities within a high amenity environment with permeable grain. The greatest concentration of employment floorspace will be in the core of the Key District Centre.
- ED4.** To promote and facilitate the sustainable development of the Naas Road Key District Centre by facilitating an appropriate and adequate range, quality and quantity of retail floorspace within the mixed-use core of the Key District Centre
- ED5.** To promote and facilitate the sustainable development of smaller-scale, neighbourhood retail facilities in locations that are locally accessible and conveniently serve businesses and local residential communities on foot or by bicycle. These retail services should provide choice and be in a quality environment to cater for the regular needs of the local communities
- ED6.** To expand the role of the plan area as a thriving office district in the western suburbs by facilitating the required quality and quantity of commercial development with active ground floor uses, in the mixed used core of the KDC along with appropriately designed high-end enterprise development along the main arterial routes into Dublin city centre.
- ED7.** To promote and facilitate the intensification of employment uses across all sectors, including the growth sectors of digital industries, science, green technologies whilst providing for some lower-intensity light industrial and employment uses in the plan area which have a strong relationship with existing communities in the vicinity by consolidating and upgrading existing light industrial units within the Z6 zoning boundaries
- ED8.** To promote and facilitate the growth of affordable and flexible, small-to-medium sized enterprises, start-up incubator businesses and units and entrepreneurial activity

**ED9.** To adopt a flexible approach towards temporary/short-term uses by promoting such uses on underutilised and/or vacant lands and buildings as an interim solution to create vibrancy and employment potential in the short-term whilst ensuring that such temporary/short-term uses do not preclude the realisation of the long-term economic vision of the plan area as a vibrant, dynamic employment cluster providing for long-term, sustainable employment uses

#### Economic Objectives

- EDO1.** To facilitate the provision of an anchor food store within the mixed use core area of the Key District Centre to serve surrounding communities and also stimulate commercial development in the vicinity. It is also an objective that any such anchor will be supported by a range of smaller retail uses – providing choice and local retail competition, and contributing to strong active public realm.
- EDO2.** In order to achieve the objectives of the KDC, to seek the sustainable redevelopment of identified key sites in accordance with Key Site Framework Strategies and employment generating land-uses specified therein.
- EDO3.** To promote the key economic role of the area as a site for new investment and employment.
- EDO4:** To promote retail and local services within the KDC, creating a vibrant, active and attractive new centre. To protect the retail character of the KDC, uses such as bookmakers, amusements and casino centres, off-licences and takeaways shall be carefully managed, and if necessary, restricted in number, so that retail remains the pre-dominant use. Clustering of such uses shall be avoided. Such uses shall not be located at high profile locations and/or addressing key junctions with the LAP area.



## 4.4 Movement and Access

To deliver a quality movement and access infrastructure that prioritises public transport, cyclists and pedestrians while managing an appropriate role for the car.

### 4.4.1 Introduction

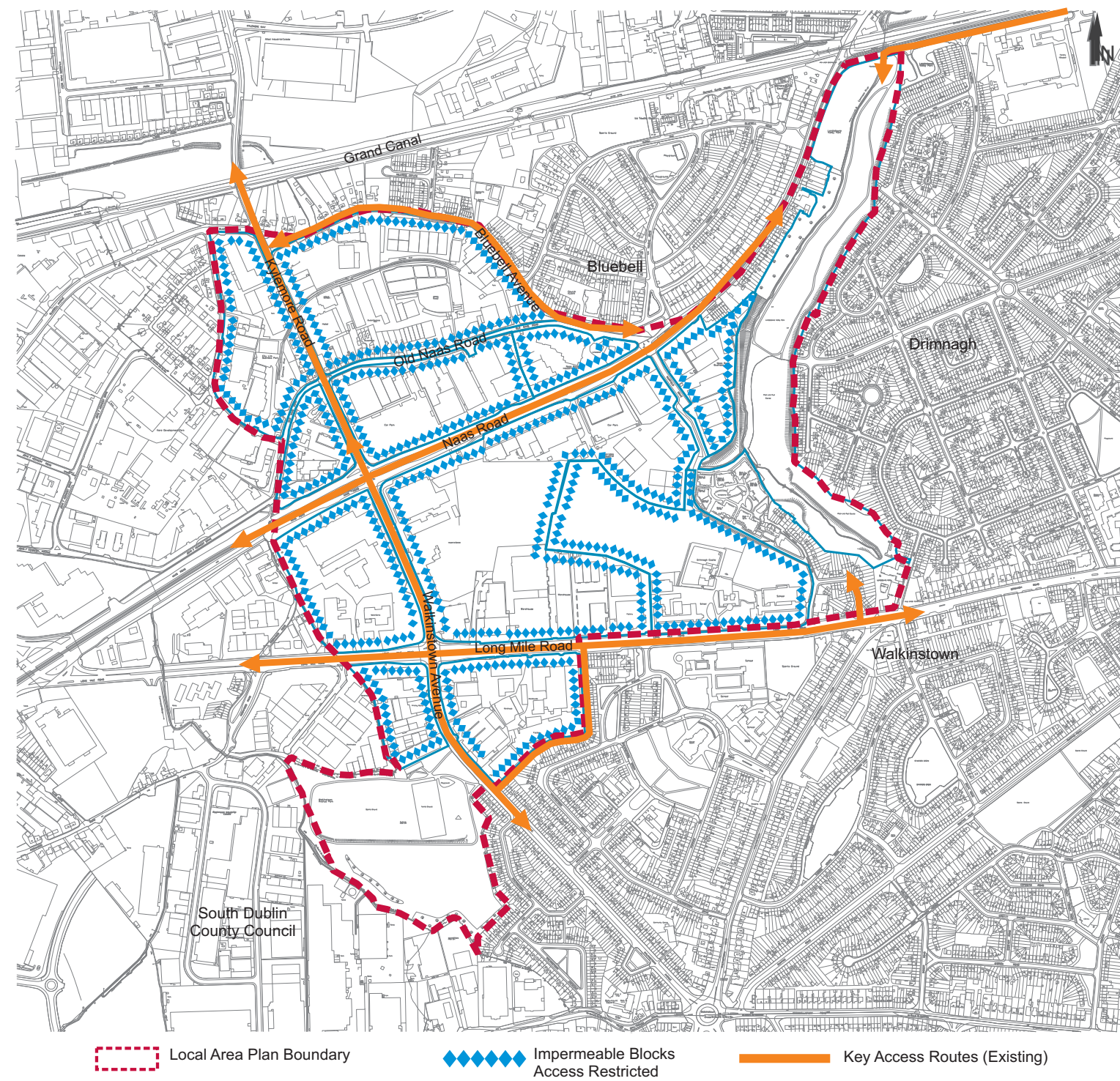
The Naas Road Plan area both benefits and suffers from its location on the major traffic artery of the Naas Road which carries heavy traffic volumes, a Luas line and a QBC. The road network serving the area is at capacity for private vehicles and as such, a major objective of the plan is to encourage as much movement as possible by public transport, cycling and walking. This requires redesigning the area to provide for as much permeability as possible, improving the environment and crossing facilities along the existing road network and improving and/or providing new connections to public transport infrastructure. A major challenge for the LAP is therefore that of balancing the needs of through traffic serving the city, and the needs of a regenerating community to provide sufficient, high quality transport options, movement and connectivity.

The policy and objectives of this section seek to support the sustainability principles set out in the National Spatial Strategy, the Regional Planning Guidelines for the Greater Dublin Area, 'Smarter Travel, A Sustainable Transport Future 2009-2020', the draft Greater Dublin Area Transport Strategy, '2030 Vision' and the Dublin City Development Plan 2011-2017. These encourage prioritisation of pedestrian and cycle movement, increasing public transport provision and usage, and seek densities of development that support public transport.

### 4.4.2 Overall Approach

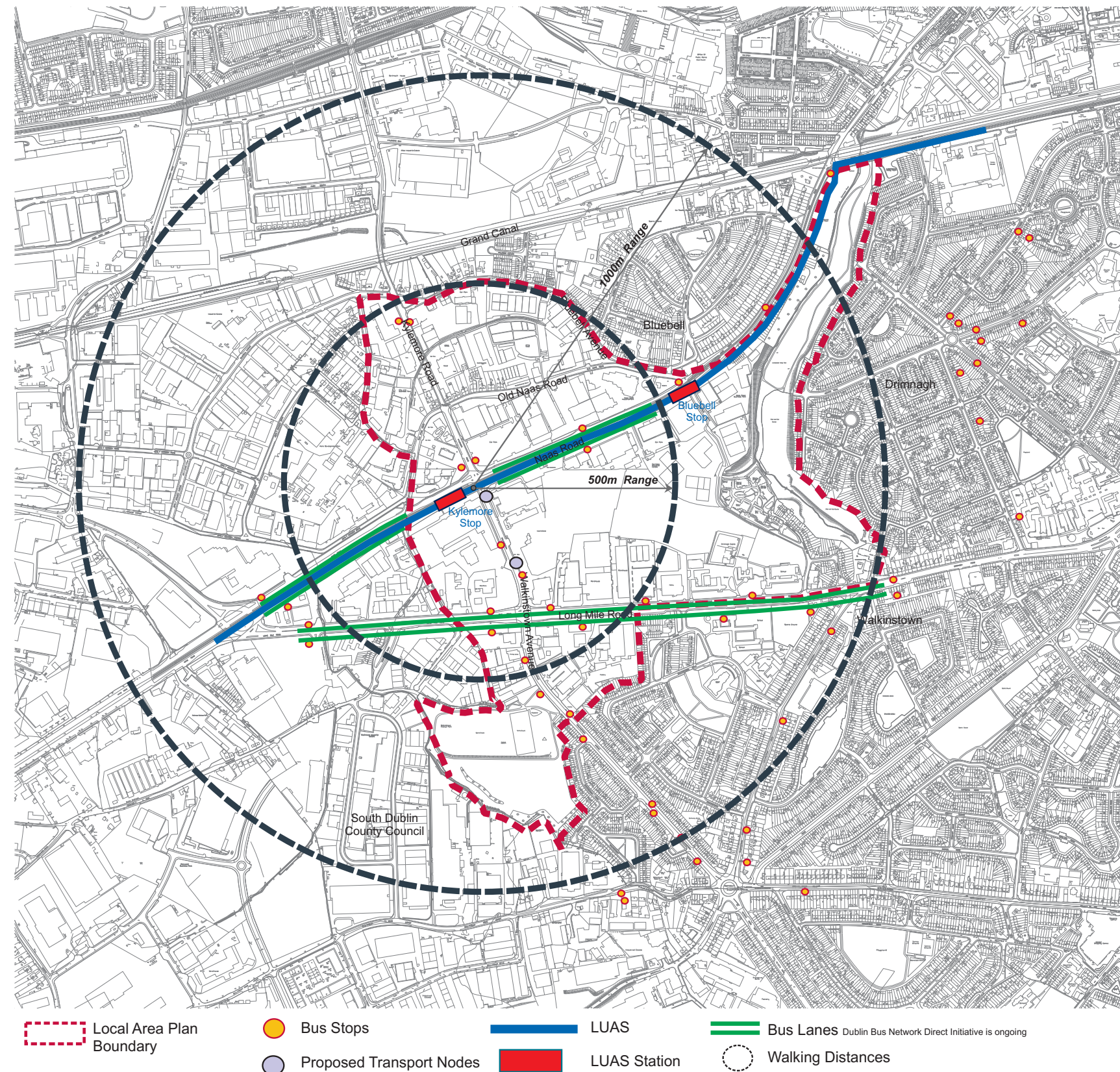
The Naas Road area is dominated by large land holdings, creating severance within the area and also making movement for pedestrians, cyclists and those availing of public transport very difficult and unattractive. The movement strategy, in tandem with other sections of this LAP seeks to reshape the built form of the underutilised lands, and in doing so, create new routes and connections that are attractive, direct and introduce alternative options for both new and adjoining communities. It seeks to increase the benefits of the existing transport and connections available both within and adjoining the LAP, and also supports future public transport investment.

Map 4.3 Existing Restricted Connectivity





**Map 4.4 Existing Public Transport Provision**



#### 4.4.3 Walking

Ease of movement within and around the Naas Road area is vital to building an attractive, safe and user-friendly public realm. Walking routes are available along the strategic routes that traverse the plan area (Naas Road, Long Mile Road and Kylemore Road). However the quality of the pedestrian environment and connections for pedestrians at major junctions is poor. Across the LAP area, large plots make traversing the area or accessing public transport connections more difficult. The LAP seeks to address these problems through:

- (i) seeking upgrading of the existing pedestrian routes;
- (ii) addressing key junction crossings to improve direct routes for pedestrians
- (iii) creating new pedestrian crossings, and
- (iv) creating a much finer grain of pedestrian routes which offer people more direct routes and more route options.

#### 4.4.4 Cycling

Dublin City Council has an overall target of increasing journeys by bicycle in the city by 25% by 2020. Permeability and direct safe routes are therefore as important to help achieve this, yet currently the permeability of the plan area for cyclists is considered poor. Cyclist movements are limited to the strategic roads, with cyclists required to share the roads with vehicular traffic. Dedicated cycle lanes are available along the R112 Long Mile Road and are located within the bus lanes. To the immediate north of the plan area is the new cycleway along the Grand Canal connecting the city with Lucan and which on completion, will form part of the Canal Way Cycle route, connecting along the Grand Canal to the Royal Canal through the city and docklands and integrating with other strategic cycle routes planned for the city. The proximity of this route to the LAP area presents an opportunity to deliver new connections to this strategic cycle route and integrate the LAP area into this growing network.

The LAP will make a significant difference to the quality of cycling provision in the plan area, making cycling a more attractive option, serving both those commuting through the area on bicycle, those working or living in the area and also providing safe cycling options for local school children accessing the schools immediately adjacent to the plan lands.

Whilst there is scope for the provision of new cycle lanes within large redevelopments, retro-fitting off-road cycle lanes to existing routes is more challenging, and hence the overall environment for cycling needs to be evaluated in examining developments proposed close to the road edge. There is also a need to upgrade key road junctions and crossings to improve pedestrian and cycle viability

New developments should provide good 'end of trip' facilities to encourage walking and cycling such as secure, covered cycle parking, shower, changing and drying facilities.



#### 4.4.5 Public Transport

The area is relatively well served by public transport with Luas and bus running through its centre. Mainline rail also serves the area although this is outside of practicable walking distance from a large proportion of the area. The public transport services are predominantly radial in nature however, providing good links between the city centre and the west but not to other areas of the city. As no additional capacity can, or will be, made available to private vehicles, the role of public transport in accommodating the movement requirements of the area now and into the future is crucial.

##### 4.4.5.1 Luas

There are two Luas stops located within the plan area including the Bluebell stop at the Naas Road/ Bluebell Avenue Junction and the Kylemore stop to the west of the Kylemore Road. The Blackhorse stop also adjoins the northern boundary at the Grand Canal. Frequency of service is currently one train every 5-6 minutes during peak periods, and since the opening of the luas line there has been a 25% modal transfer from the private car.

This said, there is a relatively low patronage of these stops comparative to other stops, and this is due in part to the severing effect of the Naas Road and the relative inaccessibility of the stops for wider pedestrian catchments. It is an aim of the LAP to address through the movement strategy this lack of connectivity to the stops from residential areas. The LAP also seeks to support the use of the Luas within the LAP area by promoting the regeneration of currently underutilised lands into mixed use areas, creating new demand for public transport trips.



##### 4.4.5.2 Bus Services

There are a number of frequent Dublin Bus routes serving the LAP area providing direct linkage to Dublin city centre and surrounding districts. The Long Mile Road and Naas Road are two major bus corridors that traverse the area with 40 buses serving stops along these routes. The routes have recently been revised by Dublin Bus, through the network review process and this review simplified the route network with better cross city connections and increased peak time connections.

There are ongoing improvement schemes being implemented by the Quality Bus Network office to provide maximum bus priority along the route. These improvements involve revising the road markings of the current carriageway to accommodate bus lanes in both the inbound (towards city centre) and outbound (towards Naas) as well as the construction of off-road cycling facilities along the corridor and will include safety improvements at junctions, including facilities for the mobility impaired and disabled.

The existing bus routes are predominantly east-west oriented, following the radial route pattern that has been established in Dublin. There is however a lack of services providing north-south access to the plan area, linking for example locations such as Ballyfermot, Palmerstown, Lucan, Castleknock, Blanchardstown to the north and west, and Walkinstown, Templeogue, Rathfarnham, Rathgar, Dundrum, Stillorgan and Blackrock to the south and east. Such an orbital route would be highly beneficial providing commuters with more travel choice. There is potential to accommodate a future QBC on Walkinstown Avenue / Kylemore Road that would form part of a possible orbital public transport route.

Buses have the greatest potential to increase public transport capacity serving the area particularly from an orbital point of view. The main focus of the plan is on improving connectivity to existing services and promoting new routes and services where required.

The LAP aims to improve accessibility to bus services, increase the local catchment for existing services and also provide for future expansion of the bus network. The LAP sees Walkinstown Avenue as having strong potential as a new route corridor, serving the Luas line, and therefore will seek the provision of a bus lane and bus interchange serving the Luas stop at Kylemore. This bus/luas interchange will be a focus of pedestrian activity, with an attractive public realm and supported by the land use proposals for relevant key sites adjoining this area.

##### 4.4.5.3 Mainline Rail Services

The closest rail connection to the LAP area is located 2.5 km to the north east at the Cherry Orchard & Park West stop on the Kildare commuter service. There is currently a dedicated shuttle service from the Kylemore Luas stop to Parkwest station. The route of the rail line passes in closer proximity to the plan area to the north, and there is the potential in the long term for an additional station near the Kylemore Road. Such development would also support and be benefited by an orbital bus route serving both the rail service and a set down/hub area along the Kylemore Road/ Walkinstown Avenue serving the Luas. The LAP supports the long term aim of a new rail station, as it would increase the choice and

interconnectivity of transport options for this area; but recognises that it is not currently in the draft National Transport Authority strategy and that it is unlikely to take place during the lifetime of this LAP. However the LAP aims to ensure that the movement strategy put in place for the plan area will readily interlink with such as service if and when it becomes available.

##### 4.4.5.4 Roads and Traffic

The main arterial routes (Naas Road and Long Mile) are nationally important transport routes serving the city for both goods vehicles, bus services and private cars. They provide direct connections to the national inter-urban network and for this reason are a key asset for the city and the LAP area. It is important that their role is protected as a key artery for the city, but also that the plan area benefits from this connectivity. Alongside this the impact of the traffic volumes has to be recognised, and balanced with the needs of cyclists, pedestrians and public transport users.

The LAP seeks to ensure that this balance is struck, by not proposing or permitting new vehicular access points onto the Naas Road, and the locating of bus interchange facilities at an appropriate distance from junctions to avoid congestion. It also seeks that the opportunities for pedestrians and cyclists to cross the Naas road are improved, and that the character of the route is changed through landscaping and appropriately scaled buildings framing the road, which emphasise the urban character of the area. This should impact on driver behaviour to make the road less hostile for others without reducing route capacity.

Car parking management is important as a demand management tool but also in terms of visual impact. The LAP seeks that car parking is provided through a mixture of underground, undercroft and some surface parking (appropriately landscaped) to ensure it does not diminish the quality of any new urban layout. The volume of parking allowable for commercial uses should reflect the high quality public transport available and applications should address mobility management principles. The need for car parking for residential uses is recognised, and such parking should be located adjacent to the residences it will serve, and depending on the built form proposed, can be either on street, within the garden or underground/ undercroft as appropriate.

Parking shall be provided for convenience shopping. This parking should be integrated into the overall design of the retail facilities and avoid large the creation of surface car parks as a permanent element. Deliveries will be managed and set-down areas designed in a manner that will mitigate any potential for disruption.



4.4.6 Drimnagh Smarter Travel Area

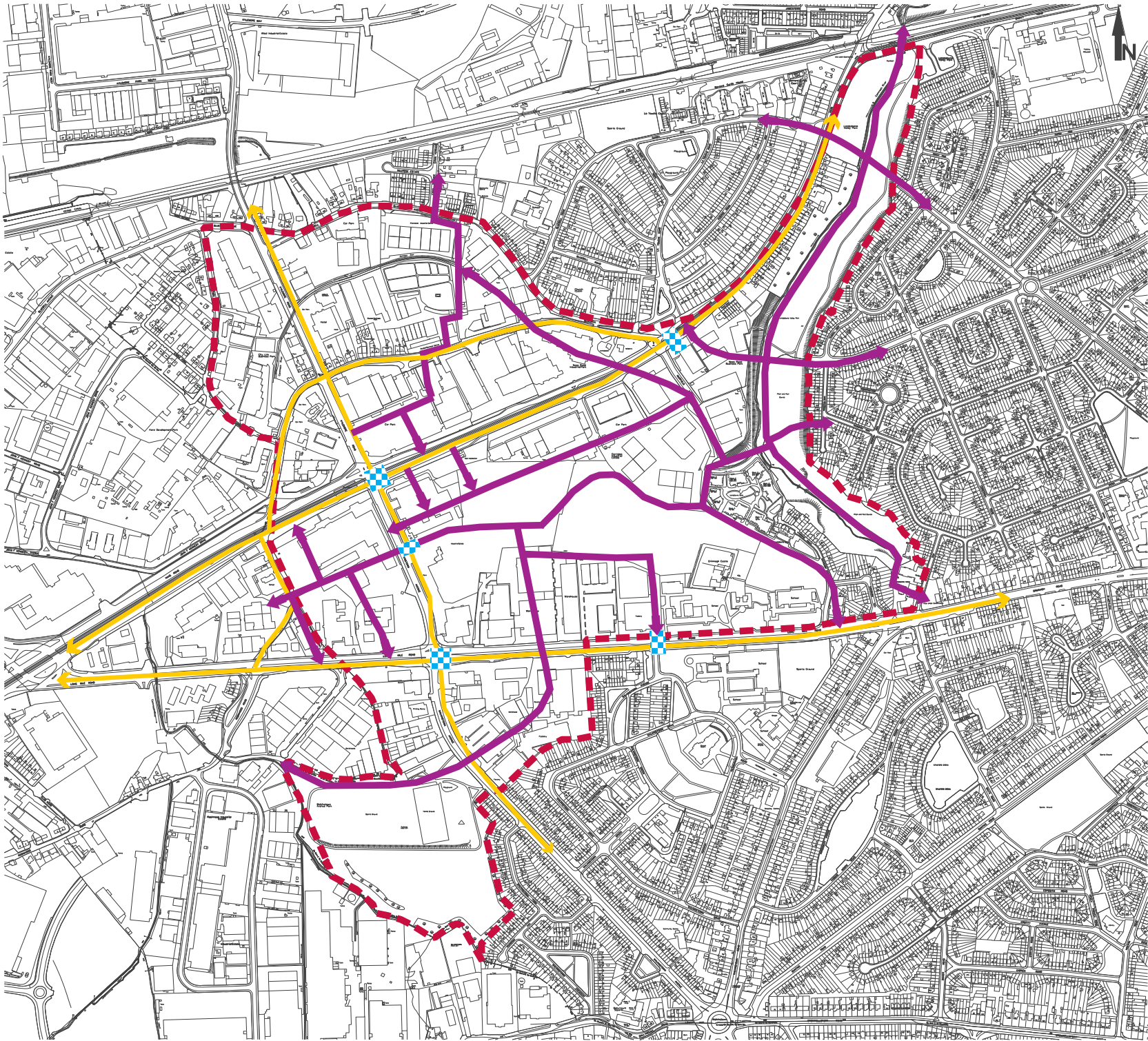
The Naas Road area immediately adjoins Drimnagh to the east and there is significant potential to improve connectivity between to the two areas. This potential for connectivity has been identified in the Drimnagh Integrated Area Plan and more recently in the Drimnagh Smarter Travel Area Plan.

Dublin City Council in partnership with the Department of Transport, Tourism and Sport, the Drimnagh community and other stakeholders officially launched Drimnagh Smarter Travel in 2011. This project arose from the Smarter Travel Areas Competition held by the then Department of Transport which sought demonstration areas for sustainable travel. While Drimnagh was unsuccessful in the national competition, DCC is committed to working with the community and other stakeholders to implement the plan for the area that was produced in partnership with the community, schools, the hospital and public transport providers etc. To date, two Sli Na Slainte routes have been provided, the route between the Luas line and the hospital has been upgraded and cycle parking has been provided both on public and private space throughout the area. Walking leader for the community and cycle training for school pupils has also been provided.

With funding from the NTA, recent works include traffic calming measures and improved crossing facilities provided on Davitt Road to improve linkage for pedestrians and cyclists to Luas and the Grand Canal as well as a promotional campaign that will support community activities throughout the year.

The LAP supports the Drimnagh Smarter Travel Plan and in particular the elements of the plan that provide increased connectivity between the LAP lands and Drimnagh. These include a pedestrian and cycle route through Landsdowne Valley Park linking Long Mile Road to Davitt Road and the canal as well as two bridge connections across the Camac linking the Naas Road/Bluebell and Drimnagh areas.

Map 4.5 Proposed Pedestrian Linkages



-  Local Area Plan Boundary
-  Proposed Pedestrian Linkages
-  Existing Roads
-  Upgraded & New Pedestrian Crossing



### Movement and Access Policies

- MA1.** To provide for a new high quality pedestrian and cycle network within the LAP area which will connect existing and new communities and redefine the character of the LAP area; including (i) creation of new segregated green routes within the LAP area; (ii) improvement and upgrading of existing routes; (iii) improvement and increased number of pedestrian/cycle crossings on main roads; and (iv) connect into existing and planned networks surrounding the LAP area.
- MA2.** Increase permeability to existing public transport routes by providing attractive, legible and direct walking and cycling links to bus and Luas stops.
- MA3.** To protect the role of the key strategic roads within the LAP area so that they continue to serve and benefit the city economically, whilst also seeking visual improvements to these routes so that they are more urban in character and provide better movement for the public bus services utilising them. New vehicular access points onto the Naas Road cannot be accommodated as this would impact on the strategic role of this important route.
- MA4.** Ensure that sustainable development within the LAP area is cognisant of the proximity of the plan area to the city centre and to existing and future public transport infrastructure and that residential densities, access points, layouts, are compatible with this.
- MA5.** To insure integration between the LAP lands with initiatives such as 'Smarter Travel' and strategic cycle routes connecting South Dublin County Council and Dublin City and to develop improved connectivity to surrounding communities including Walkinstown, Ballyfermot, Drimnagh and Bluebell.

### Movement and Access Objectives

- MAO1.** To create a south-east/north-west linkages from Long Mile Road and Landsdowne Valley Park to the Naas Road and to the Grand Canal to provide cycling connections to the Canal Way and to provide direct links through the LAP area to the Luas and bus services on the Naas Road.
- MAO2.** To create new pedestrian and cycle linkages on an east west axis connecting Robinhood Road through the key sites to Landsdowne Valley, Naas Road and Drimnagh. (see Chapter 5 for detail).
- MAO3.** To seek the delivery of improved pedestrian and cycle environments, with green infrastructure along Kylemore Road, Walkinstown Avenue and Long Mile Road. (see Section 4.8 for further details).
- MAO4.** To implement pedestrian infrastructure improvements along the Naas Road to facilitate and increase opportunities for crossing the carriageway.
- MAO5.** To identify funding for key movement and access enhancements through the 'Sustainable Transport Measures Grants' system and other measures operated by the National Transport Authority with a view to prioritising a number of improvements proposed in this LAP that will interlink with existing projects.
- MAO6.** To provide good quality end of trip facilities to encourage walking and cycling such as secure and weather proof bike stands, lockers, showers changing and drying rooms.
- MAO7.** To ensure that all new routes, inclusive of those accommodating traffic, shall be designed and constructed in a manner that will facilitate the safe and easy movement of pedestrians and cyclists
- MAO8.** To work with all relevant providers to facilitate a quality bus, pedestrian and cycling link on a north-south axis (Kylemore Road/ Walkinstown Avenue), with orbital capability and associated interchange potential between bus, heavy rail and Luas.
- MAO9.** To create a through access in Landsdowne Valley Park, linking Davitt Road in the north with the Long Mile Road in the south and also creating a western access to link to Drimnagh Castle and Walkinstown Avenue.

**MAO10.** To facilitate works along the Naas Road that will reduce traffic impact and improve safety for pedestrian and cycle users and facilitate improved linkages. This may comprise landscaping works, public realm enhancement, reconfiguration of the carriageway and provision of a direct pedestrian crossing across the Naas Road.

**MAO11.** Car parking provision shall reflect the accessible nature of the area via public transport, both existing and proposed, with the quantity determined in consultation with the planning authority through a Transport Assessment prepared as part of the planning process.

**MAO12.** To foster and support a pro-active mobility management approach and a culture of sustainable travel in new and existing developments.



## 4.5 Urban Form, Design and Public Realm

**To create a lively and definable city quarter through an attractive formation of streets, public spaces and buildings.**

### 4.5.1 Introduction

Urban structure and form relates to the pattern of streets, blocks, spaces and buildings and how they relate to the wider area. Urban design focuses more on the interlinked relationship of buildings, streets and uses to create a coherent sense of place. These design principles are important in shaping how major sites are redeveloped and interact with each other and surrounding areas. Critical to the success of these design principles is the enhancement of the public realm making the places between buildings attractive, useable and safe. The scale and height of buildings framing the spaces between is also an critical element in developing quality urban form.

The Dublin City development plan policies aim for the creation of a more compact, quality, green and vibrant city close to good social and physical infrastructure. It stresses the need for a quality public realm and the Council has, as an action of the development plan, produced a draft Public Realm Strategy titled “Your City, Your Space” in recognition of the need to both promote and deliver a quality public realm.

The Naas Road is identified as a location that will provide a significant redevelopment opportunity for Dublin as articulated through its designation as a Key Developing Area, (KDA) Key District Centre (KDC) and Strategic Development and Regeneration Area (SDRA) .

The existing layout and character, defined by a dispersed and land intensive character, reflective of its industrial nature presents an opportunity to redefine the relationship of these lands to their immediate surrounding communities and physical environment, and to restructure existing underutilized sites through a regeneration and redevelopment process.

In the Naas Road lands plan area there area a number of existing historic features and amenities that have potential to contribute more positively to the urban environment by improving their accessibility and setting. This can be achieved through the opening of new routes and also by redefining urban structure through the setting of building lines and building heights.

In setting out a defining element of the urban structure of the plan lands the Plan seeks to utilise the concept of green routes to frame, connect and shape future developments. This approach will support biodiversity and urban legibility and improve connectivity for sustainable modes of transport. Where new streets and civic areas are created or enhanced, attention to the quality of materials and finishes will be key to achieving and maintaining a quality appearance for the future.

### 4.5.2 Urban Design Strategy for the Naas Road Lands

This section of the LAP addresses the principles to inform future development in the LAP lands. The Key Site Framework Strategies provide greater detail on the role each key site plays in achieving an integrated approach and also addresses the interlinking of this section with the other elements of the LAP. (see Chapter 5.)

This urban design strategy addresses key issues and challenges under the following relevant headings:

- **Urban Form and Structure**

The overall aim is to create a sense of place and legibility by developing a consistent, perimeter block/street arrangement, typically 4-6 storeys in height addressing main roads, and 3-6 storeys within each site, with numerous links created via new streets and green routes.

Perimeter blocks will address the main arterial roads, squares, parks and open spaces and generally define the development area. Block position will be defined with a view to pedestrian connectivity and uniformity of building height is encouraged along key frontages, save for keynote design features at identified locations.

The indicative heights recommended are selected with consideration to land-use, centrality, visual exposure, and role in regard to urban design. Whilst an indicative block form is shown within key sites, the final shape of blocks will reflect the uses proposed, and for this reason changes to the indicative block shape can be considered, once the key principles identified regarding structure, shaping the public realm, connectivity and structure are retained. Emphasis is on the creation of a vibrant neighbourhood that is recognisably a connected part of the city.

The positions for landmark buildings within key sites have been carefully selected in order to create a sense of place, contributing to urban legibility and visual diversity.

The successful implementation of the LAP depends on the integrative development of these four key sites (Motor Distributors Limited, Royal Liver, Nissan, and Muirfield Drive/Naas Road). These sites are examined in detail in Chapter 5 and indicative guidance is given in relation to block layouts urban design, building heights. Particular attention is focused on public realm having regard to specified land-uses.

- **Connectivity**

Increased connectivity and improved quality of connections are vital for the success of the LAP. The LAP seeks to establish new north/south links from Walkinstown to the Grand Canal and new east/west links, from Drimnagh Castle to Robin Hood Road.

The key sites play a key role with the dominant feature a new tree-lined boulevard with high quality pedestrian and cycle space connecting through the centre of the Nissan and Motor Distributors site. This boulevard will be of sufficient scale so that it provides an attractive pedestrian area for interaction, particularly adjacent to the commercial and retail uses proposed.

From this boulevard will run a series of smaller green routes, linking new and existing open spaces and providing attractive connections to the wider cycle network, main roads and public transport services; and also to future green connections in the South Dublin County Council area.

A new green civic space within the Royal Liver site will form part of this interconnectivity and provide attractive routes through this area, and visually connecting with the lands to the south.

It is the aim of this approach that overall connectivity to adjoining communities surrounding the LAP area shall be greatly improved and there is clear distinction between proposed vehicular and cycle/pedestrian routes,allowing pedestrians and cyclists avail of a safer, more attractive way of moving around.

This hierarchy of street linkages shall resolve existing ‘blockages’ to movement creating a grid of east-west and north-south routes and integrating with green routes and spaces to provide variety.





#### • Services Infrastructure

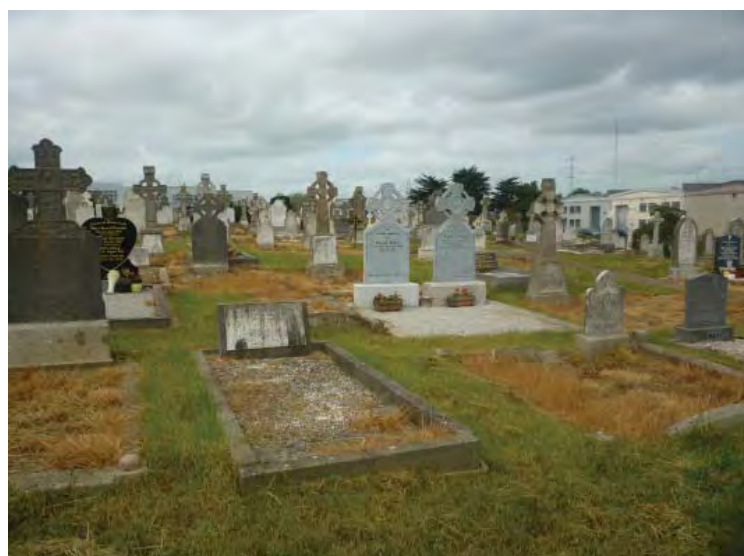
The phasing, scale and layout of the new development may be influenced by the provision and location of service infrastructure. Comprehensive and complete redevelopment of key sites will be dependent in some cases on undergrounding of electricity wires and removal of pylons, whilst other areas will need to address piped infrastructure and the necessity to relocate water mains in order to achieve the desired urban layout. For sites affected, it is considered appropriate that early phases of such sites which can proceed without impacting on the service corridors should be encouraged, and that the build out of later phases would then require delivery of service relocation.

The planning authority will exercise flexibility in regard to the approach taken and may consider temporary/interim urban design solutions pending the addressing of the above matters. This would only be considered where there is a site masterplan prepared which addresses how the interim solution will not undermine the overall design approach for this site.

#### • Character & Culture

The LAP area contains a number of heritage assets ie, Drimnagh Castle, Bluebell church and graveyard, the Mercedes building on the Naas Road and Landsdowne Valley. A defining character of the Naas Road area at present is their limited visual exposure to the public. The urban form proposed in the LAP seeks to redefine this locations and give them a new, visually open setting, increasing footfall in their vicinity and provide for greater appreciation of these cultural assets.

A role of the LAP is also to create new places that will shape the character and culture of the area. The linking of new community and culture facilities to key areas of the public realm / public open space aims to give meaning to new locations and also provide new high quality settings for communities- both new and existing- to use.



#### 4.5.3 Height and Density Strategy

The development plan has identified the Naas Road as a suitable location for mid-rise development. The aim of the height strategy is to provide a definitive outline to strengthen the urban structure of the locality, complementing the policies outlined in the LAP in relation to urban form and streets.

The development plan outlines (amongst other objectives) that regeneration in the Naas Road shall;

- Provide for a limited number of mid-rise buildings, to complement proposals for a new Key District Centre, with a sustainable mix of employment, residential, retail and community uses supporting the surrounding areas.
- Develop a significant node at the junction of Naas Road, Walkinstown Road and Kylemore Road, which would acknowledge the strategic nature of the site as a key district centre and gateway to the city. The area has the potential for a small cluster of mid-rise buildings in a coherent pattern.

The Development Plan sets a requirement for the LAP to identify sites that may be appropriate for an element of height which for this area is set at a maximum of 50m (mid-rise). The LAP recommends that a maximum of 40m or 10 storeys be applied (as illustrated in the height strategy map). Proposed mid-rise buildings would be located in sites around the following junctions where they would be visually impressive without impacting negatively on amenity;

- (a) Naas Road/Kylemore Road, and
- (b) Long Mile Road/Walkinstown Avenue.

The design of taller buildings should *inter alia*, allow for higher permeability, assist in breaking up the mass of the building to relieve bulkiness of design, provide variety in built form and facilitate a variety of uses. Such buildings should also be aesthetically attractive and adhere to the development plan slenderness ratio standard.

Where the use of a mid-rise building is not chosen as the option for building at these locations, the achievement of a keynote landmark built form will still be required. The design of the building to address these corners, through the use of distinctive and high quality architecture, will address the junction, providing a key marker for the plan area and help to define these gateway locations to the city.

In determining allowable heights the approach has been directly informed by the development plan designations - particularly zoning and the KDC core. The key sites detailed in Chapter 5 do not cover the entire KDC and therefore the height strategy below has regard both to the visual prominence of corner sites and the range of potential land uses across the entire LAP area. Exceptions to the general thrust of the height strategy allows for some greater height at corner positions on exposed sites- namely at the two junctions at the Naas Road and Long Mile Road with Walkinstown Avenue.

#### 4.5.4 Indicative heights.

| Location                                       | Indicative Height                                                                                        |
|------------------------------------------------|----------------------------------------------------------------------------------------------------------|
| Key Sites                                      | As 'Key Site Framework' strategies in Chapter 5                                                          |
| Corner Locations                               | 7-10 storeys ( As indicated on the height strategy map, by the shading / landmark building designation ) |
| Addressing Naas Road & Longmile Road (part of) | 5-6 storeys                                                                                              |
| Within KDC boundary but outside the key sites  | Maximum of 5 storeys                                                                                     |
| Within LAP Area but outside KDC boundary       | Development Plan standards apply                                                                         |

The following criteria must however be taken into account and may restrict the achievement of the above indicative heights

- Development immediately adjoining existing residential areas should not exceed two storeys above the height of existing housing.
- Seveso restrictions may apply with regard to allowable land use and intensity of development.
- Restrictions associated with utilities and piped services - including electricity pylons and high tension electrical cables, watermain and other wayleaves etc

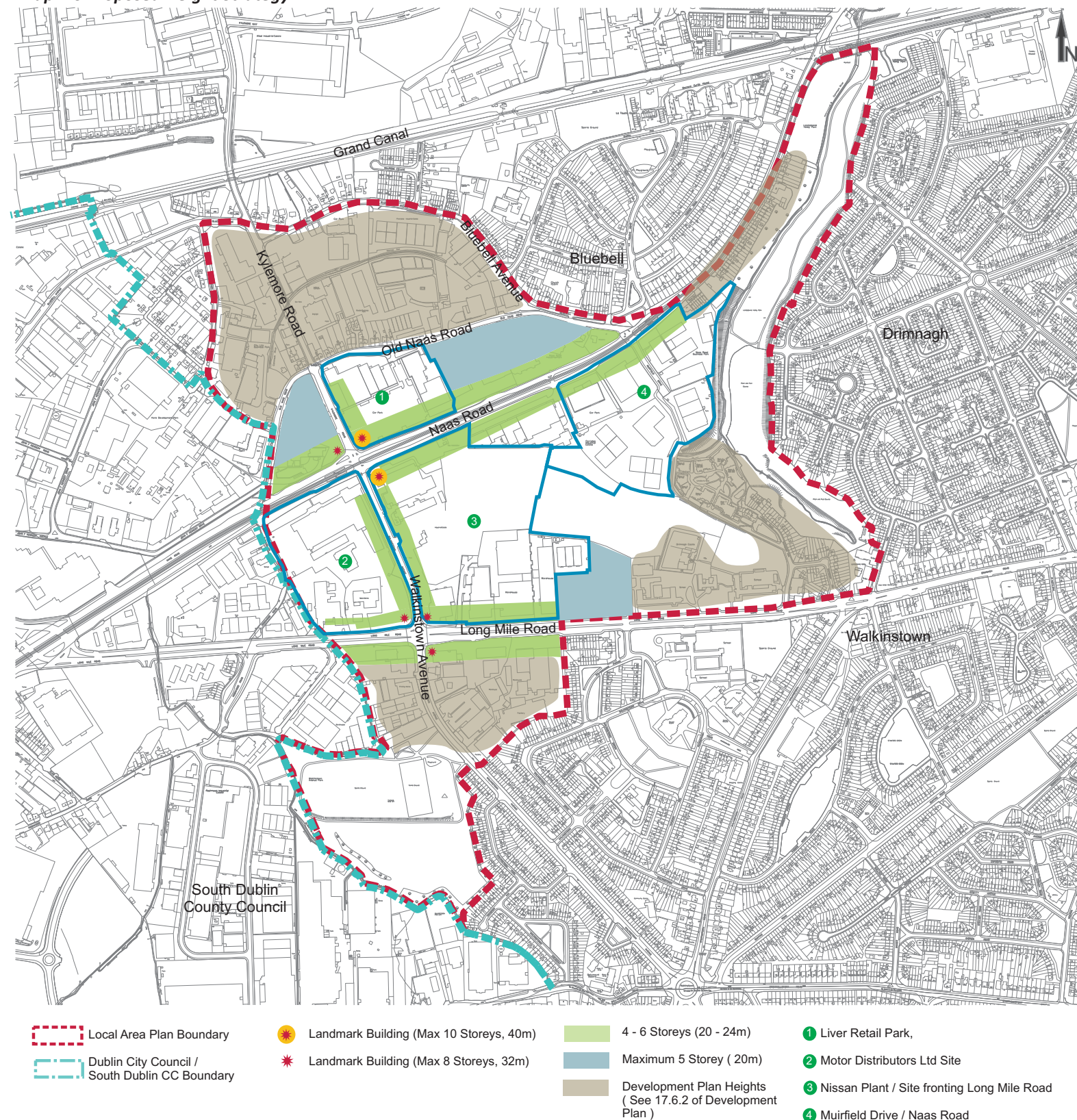
It should be noted that all proposals shall be required to comply with the detailed requirement for buildings with height as set out in the city development plan.

#### Density, Plot Ratio and Site Coverage

Within the LAP area a net density of between 45-50 residential dwellings per hectare is sought and a variety of dwelling typologies (apartment, duplex, townhouse) will be encouraged. The indicative plot ratio of 1.0 – 3.0 and the indicative site coverage figure of 50% are outlined in the development plan .



**Map 4.6 Proposed Height Strategy**



### Urban Form, Design and Public Realm Policies

**UF1.** To redefine, through the progressive creation of smaller plot layouts and implementation of appropriate urban design measures, the existing built fabric of large impermeable sites centred on the Naas Road, and to develop an urban structure that is distinctive and effectively integrated into the wider urban context in terms of street layout and permeability .

**UF2.** To promote active and diverse land-uses at selected locations particularly at ground floor level in the vicinity of the KDC, and to ensure day long activity by encouraging convenient pedestrian access to these uses via new links.

**UF3.** Having regard to the planned delivery of mixed uses on key sites, to ensure clear demarcation between public, private and semi-private realms.

**UF4.** To promote 'green' public realm through the incorporation of street trees, vegetation and SuDS measures into new developments (see also Green Infrastructure chapter)

**UF5.** To minimise the adverse impacts of noise and promote good health for the existing and future residents of the plan area through the effective management of noise in line with the Dublin Agglomeration Noise Action Plan

### Urban Form, Design and Public Realm Objectives

**UFO1.** To provide for building heights on redevelopment sites in accordance with indicative heights set out in the height strategy. (see section 4.5.3 and map 4.6)

**UFO2.** To pursue objectives of key site framework development strategies to improve urban structure, provide for new and appropriate land-uses and revised building heights.

**UFO3.** To seek the sustainable redevelopment of the key district centre focused on an urban boulevard and incorporating quality public realm. Central units at ground floor level fronting public areas shall be of fine urban grain and quality materials.

**UFO4.** Any landmark buildings will be characterised by high architectural quality, designed with the specific location/position and land uses in mind.

**UFO5.** With particular reference to proposed buildings alongside (and visible from) the Naas Road, these shall demonstrate a degree of design consistency – both in terms of height, general design and materials.

**UFO6.** To ensure that service infrastructure provision (water, sewerage, electricity cable ducting, flood risk measures) is planned, phased and provided in a sequential manner that will allow for the realisation of planned layouts.



4.6 Housing

4.6.1 Existing Housing

There is a relatively small resident population within the plan area, given the predominantly commercial and industrial nature of the land-uses. The plan area contains approximately 500 residential units (circa 120 houses and 380 apartments).

At present, housing stock in the area is comprised of lower-density housing dotted throughout the plan area and higher-density apartment schemes located in the south-east of the plan area. There is an established residential row of two storey-housing along the Naas Road, terraced housing in Grange Court, two-storey and single-storey twentieth century houses in Lansdowne Valley and Slieve Bloom Park, an enclave of single-storey, semi-detached cottages developed at a low density scale along the Old Naas Road along with some relatively recent backland residential development to the rear of some of these dwellings. This residential enclave along the Old Naas Road is entirely surrounded by industrial uses with the front elevations of some of the cottages orientated towards the 3-storey high (approx) warehouse units which form the rear boundary with the Royal Liver Retail Park, failing to make any positive contribution to the streetscape and resulting in a relatively poor quality visual residential environment. Some individual detached dwellings are located along Old Naas Road within the Z6 industrially zoned lands with additional dwellings along Kylemore Road. This older housing stock is low density in layout comprising semi-detached houses, cottages and also some terraces. The more densely developed multi-storey apartments, located in the south-east of the plan area, were developed during the economic boom and differ significantly in character from the older housing. These developments are at Slieve Bloom Park and Slieve Bloom Road i.e. Lansdowne Gate and Lansdowne Valley. Lansdowne Gate consists of a mixed-use residential / office development of 280 residential units (including 100 live-work units), a crèche and some small-scale commercial development. Lansdowne Valley is an apartment development consisting of some 120 units.

The plan is also surrounded by large residential neighbourhoods comprised of established residential communities to the north (Bluebell), to the east (Drimnagh) and to the south and south-east (Walkinstown). Directly adjoining the plan area to the north-west, and enclosed by industrial lands on all sides is a small residential enclave of established houses in Camac Park.



4.6.2 Current Policies

In recent years, the government and Dublin City Council have formulated a series of guidelines for planning authorities regarding the requirements for new residential development. The governmental guidelines include Delivering Homes Sustaining Communities – Statement on Housing Policy (2007), Quality Housing for Sustainable Communities - Best Practice Guidelines for Delivering Homes Sustaining Communities (2007), Design Standards for New Apartments (2007) and Sustainable Residential Development in Urban Areas (2009) with accompanying Urban Design Manual - A Best Practice Guide (2009). The city development plan seeks to build upon and enhance the provisions of these guidelines. Dublin City Council's planning policies for housing are set out in Chapter 11 - ( Providing Quality Homes in a Compact City ) - of the plan and seek to ensure that new housing provision meet the need of the city's citizens at all stages of their life cycle and is adaptable to people's changing circumstances.

4.6.3 New Housing

As per the core strategy of the development plan, it is estimated that the capacity of this key developing area is 2,100 housing units - equating to approximately 200,000 sq.m. of residential development over 15 to 20 years. It is intended that these would be delivered by way of new residential areas, with some additional housing contained within mixed-use areas. New housing will be developed in a medium and high-density format as is appropriate to this location, and it should accommodate a diversity of housing tenures and types – helping to redefine the character of the area.

| Core Strategy        | Lifetime of the LAP    | 15 - 20 yr+ Timeframe                             |
|----------------------|------------------------|---------------------------------------------------|
| 2,100 resident units | 50,000sq.m.residential | 200,000.sq.m.<br>(approx 2,100 residential units) |

Delivery of new housing shall be by way of redevelopment of existing smaller sites, some infill development, and mainly through the development of key sites as per site briefs.



Housing Policies

- H1.To encourage and foster the sustainable development of high-quality, energy efficient residential accommodation in the area as a key component of a vibrant mixed-use area
- H2.To ensure that all new housing delivers high quality residential environments and protects the residential amenity of existing residential development in the plan area and its environs
- H3.To seek housing at sustainable densities in order to create the critical mass of persons to support existing and proposed infrastructure and services in the plan area and the environs
- H4. To encourage active ground floor uses and prevent residential uses at ground floor level facing busy streets to ensure a vibrant streetscape and good residential amenity
- H5.To seek a mix of housing typologies within residential developments and also in larger mixed use schemes.
- H6.To facilitate and encourage the provision of live-work units to enable people to work from home, particularly artists, small enterprise operators and start-up businesses

Housing Objectives

- HO1. To facilitate the sustainable development of approximately 2,100 additional residential units in the plan area
- HO2. To facilitate and encourage new residential development in accordance with development plan residential quality standards. Specific objectives (including indicative layout objectives) of site briefs shall apply where applicable -see chapter 5.



4.7 Built Heritage & Conservation

To protect and preserve the built heritage of the Naas Road lands area plan and to promote the conservation and enjoyment of built heritage features .

Whilst generally characterised by modern development of a dispersed and industrial nature the area contains valuable architectural heritage dating back to the early settlement of the city. The most significant sites within the area are from the Medieval and post-Medieval periods, i.e. Drimnagh Castle and Bluebell Cemetery, whilst more modern industrial heritage is reflected in the form of the Grand Canal and the Volkswagen car plant. All these sites are within or directly adjoin the LAP area. Early settlement around the River Camac may relate to part of the ‘Slighe Mor’ routeway to the west , a route which originally came through inchicore and along the River Camac.

The area also includes historic road routes that have are now consumed by more recent industrial areas. Early walls and other features reflect the time these were built. Also of relevance are some of the older residential dwellings - some of which have been converted to commercial use in more recent years.



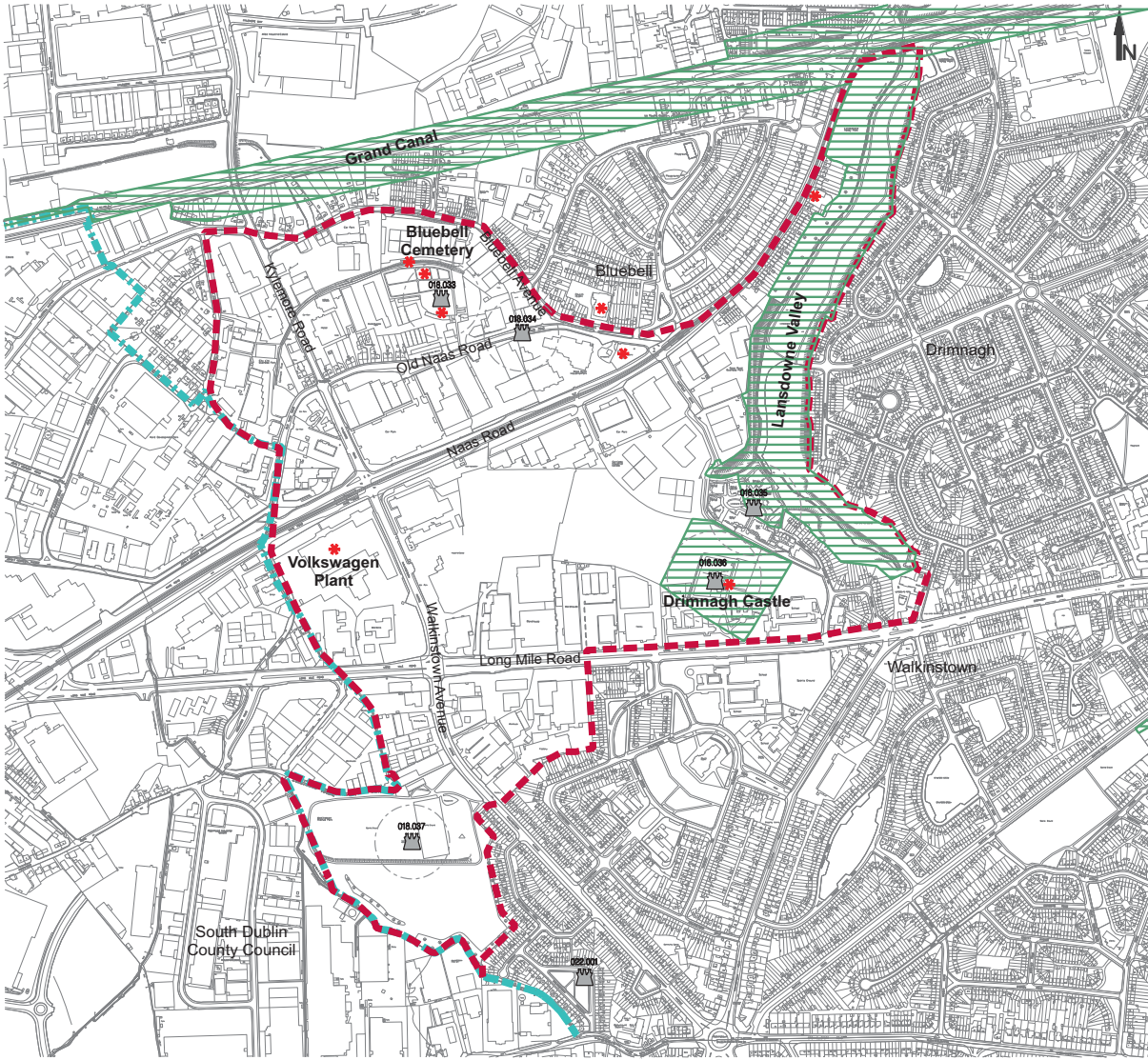
The built heritage of this area is little known within the wider city context and this is partly because the gradual development of industrial lands has modified their original context and setting. This LAP affords an opportunity to utilise heritage assets in line with various development plan guidelines, to develop identity and a sense of place. Dublin City Council will seek to ensure that the local architectural, archaeological, and industrial heritage is, recorded, conserved (where appropriate) and enhanced for the benefit of future generations. Heritage assets can be used to frame future development and can become memorable focal points thereby giving legibility to the area. Structures of architectural and/or historical importance can also have potential for integration into the emerging urban fabric in a manner which safeguards their long-term survival.

4.7.1 Dublin City Development Plan 2011 - 2017

The current plan details policies and objectives supporting the ongoing protection and enhancement of buildings of merit . These include ;

- The promotion of tourism in the Medieval City and suburbs.
- The promotion of awareness of the international significance of Viking and Medieval Dublin and to investigate key medieval sites and to conserve their character, setting and amenity through Irish Strategic Archaeological Research (INSTAR) Medieval Research Agenda and other initiatives.
- The consideration of new uses which are compatible with the character of protected structures.
- The implementation of relevant recommendations of the Dublin City Industrial Heritage Record (DCIHR)

Map 4.7 Existing Heritage/ Conservation/ RPS Designations



- Local Area Plan Boundary
- Conservation Areas
- Dublin City Council / South Dublin CC Boundary
- \* Protected Structures
- ⬮ Sites of Archaeological Interest
- National Monuments



#### 4.7.2 Conservation Areas

Conservation areas have been designated in the city in recognition that certain buildings/structures have special merit particularly when assessed collectively or as part of a streetscape/landscape. Within the Naas Road LAP area there are conservation areas surrounding Drimnagh Castle at Lansdowne Valley Park, the latter connecting to the Grand Canal Conservation area.

#### 4.7.3 Archaeology and National Monuments

There are a number of national monuments/areas of archaeological interest located within the Naas Road LAP area and reference the number corresponds to their position in the National Monument inventory. National Monuments are protected by the National Monuments Acts. These are detailed in map 4.7 and covered in Development Plan policies and objectives, regarding development in the vicinity of these protected monuments and what safeguards the LAP will be required, by law, to satisfy. (further details on national monuments can be accessed at [www.archaeology.ie/NationalMonuments](http://www.archaeology.ie/NationalMonuments))

**Walkinstown Avenue Park**, DU018-037 Walkinstown Avenue Park contains evidence of a 'Linkardstown' burial where a circular mound covering a central cist or chamber which contain human remains, radio-carbon dates for these burials centre around 3500 BC.

**Drimnagh Castle & Environs**, DU018-035 & DU018-036 (detailed below in RPS Section)

**Bluebell Cemetery & Environs**, DU018-033 & DU018-034 (detailed below in RPS Section)

#### 4.7.4 Dublin City Industrial Heritage Record (DCIHR)

The value of industrial heritage has recently been recognised as of being of equal merit to architectural or natural heritage, particularly in a country where such examples are relatively rare. An inventory has been completed and 13 sites within the LAP area have been surveyed. Recommendations in the industrial heritage report relate to the updating of the RPS, including the following primary recommendation: "That the RPS be revised and updated in light of the findings of this and earlier surveys and that buildings which have been evaluated as of regional or higher merit be protected by inclusion in the RPS". No features of industrial heritage found in the LAP area have been evaluated to be of regional or higher merit. However the role of industrial heritage in the creation of the city is recognised and all such buildings and features should be protected.

#### 4.7.5 Record of Protected Structures (RPS)

There are a number of Protected Structures in the LAP area which are detailed in map 4.7. The protection of buildings on the Record of Protected Structures (RPS) requires the protection of the built fabric of the structure and also the safeguarding of the environment surrounding the structure.

#### Drimnagh Castle - (RPS Ref 4832) and related Conservation Area

In the year 1215 the lands of Drymenagh and Tyrenure were granted to a Norman knight, Hugo de Bernivale, who selected a site beside the "Crooked Glen", the original Cruimghlinn, that gives its name to the townland of Crumlin, and there he built his castle. This "Crooked Glen" is better known today as Lansdowne Valley, through which the river Camac makes its way to the sea. Drimnagh Castle is important due to its architectural rarity and the intactness of the complex within a surviving open landscape. The importance of the castle as part of the architectural heritage of the city is immense. The castle itself was, until 1954 one of the oldest continually inhabited castles in Ireland, and is an outstanding example of an old feudal stronghold. It is the only Irish castle still to be surrounded by a flooded moat. The castle, built of local grey limestone, consists of a restored Great Hall and medieval undercroft, a tall battlement tower with lookout posts, and other separate buildings including stables, old coach house, dairy and folly tower.

An understanding of the morphology of the area, with Drimnagh Castle at the core is critical to appreciating the overall archaeological, historical and architectural context. Drimnagh Castle presents an opportunity for further tourism and educational development to encourage greater awareness of the city's medieval heritage.



#### No 55 Naas Road - (RPS Ref 5791)

No 55 Naas Road is a distinctive double bay red brick dwelling now used as a business outlet. It backs onto Lansdowne Valley Park and the river Camac.



#### Volkswagen Premises - (RPS Ref 5792)

The Volkswagen premises, fronting the Naas Road on a 6 hectare site, is a fine example of Art Deco style having a symmetrical design comprising a central tower and flanking wings. Other distinctive features include north facing 'sawtooth' light panels, redolent of many industrial buildings of the 19<sup>th</sup> century. The building is a good example of mid 20<sup>th</sup> century industrial architecture within the city. Having originally been built to accommodate the tailoring chain 'Burtons', it was never occupied by them and lately has been utilised by the car manufacturing company Volkswagen, to reassemble imported cars and most recently a distribution site for Mercedes.

The RPS reference states - 'Volkswagen premises – front range of buildings only'. There is therefore an opportunity to develop the remainder of this large site in a complementary fashion.



#### 'Naisetra' - House - (RPS Ref 5793)

Naisetra House (Old Naas Road/Bluebell) is a substantial redbrick Edwardian dwelling located at the junction of the Old Naas Road and the N7 route at Bluebell. It was constructed in 1886 and is so named because of the artesian well within the grounds, (Naisetra is artesian spelled backwards) .





**Medieval church ruin, graveyard and surrounding ring fort -Ref 5794**

The ruined remains of this parish church stands within a large graveyard on the southern banks of the Camac River. The church was a small oratory probably of late medieval providence (13<sup>th</sup> Century). It appears to have been in use in 1547 at the time of the dissolution of St. Patrick’s Cathedral. The church is situated in the centre of the graveyard which was extended northwards in 1905. A rectangular graveyard, the old south section, is defined by a bank and fosse (defensive ditch) in a contour pattern suggestive of a ringfort. The earliest known gravestone is dated from 1713.

There is an opportunity for further archaeological investigation when adjacent areas are redeveloped and the cemetery area can be utilised as an amenity area and as a route marker through the area. In common with many historic graveyards the cemetery is also a repository of flora and fauna.

**Visual Linkages & Connectivity**

Views both from and within the LAP area are important in that they orientate people by providing a degree of urban legibility. There is an opportunity to re-establish important visual markers such as Drimnagh Castle and Bluebell Cemetery as part of an overall emerging fabric. Improved connectivity can be achieved either via the form of new-build or as part of green infrastructure links. Objectives of key site framework strategies as set out in chapter 5 and related green infrastructure objectives assist in developing such connectivity and new visual links.



**Built Heritage & Conservation Policy**

- BH1.** To safeguard the character and setting of heritage sites in the LAP area and to promote the conservation, enhancement and enjoyment of built heritage, in tandem with the regeneration of the area.
- BH2.** Over the period of the LAP, to realise visual and pedestrian links between heritage sites/structures and the evolving urban form through setting relevant objectives.

**Built Heritage & Conservation Objectives**

- BHO1.** To enhance the setting of Drimnagh Castle and to ensure that any development to the west (north of Long Mile Road) is appropriately designed to increase its accessibility from these lands and from nearby green infrastructure.
- BHO2.** To enhance and protect Drimnagh Castle and Bluebell Cemetery by considering their topography, particularly in relation to the River Camac - when creating linkages and routes within the area and developing their potential as educational and tourist attractions.
- BHO3.** To ensure that future uses of the former Volkswagen premises (now Mercedes), a protected structure, takes place in a manner that respects both the significance of the setting and the scale/ design of the protected elements of the building.
- BHO4.** To protect historic road routes within the LAP area where appropriate, and to seek that related heritage features such as stone walls or gate pillars, are retained where they have potential to contribute positively towards future development.
- BHO5.** To explore the possibility of an extension to the city centre east - west heritage routes, linking to Drimnagh Castle and incorporating nearby industrial heritage.



# Section 4.8 Infrastructure and Water Management

## 4.8.1 Introduction

*To deliver the necessary infrastructure to ensure adequate capacity to accommodate the quantum of development envisaged by the local area plan, and to ensure that the delivery of this infrastructure enhances the quality of the city's environment and facilitates the sustainable economic growth and co-ordinated development of the Naas Road area.*

Adequate services and infrastructure are an essential component of development. Infrastructural services include water supply, wastewater and surface water removal and treatment, electricity supply, broadband, gas, mobile phone coverage and telecom connections.

The purpose of this chapter is to identify the existing public water supply, drainage and other key infrastructure within the Local Area Plan (LAP) area, and to set out the requirements and investment needed in infrastructure to meet the objectives of the LAP. The implementation of the LAP will take place in a phased approach and it is envisaged that upgrading or expansion of elements of the public infrastructure both within and outside of the LAP area will be required as development progresses.

This chapter addresses these issues in two sections namely (i) water services (including supply, drainage and flooding) and (ii) utilities; with the final section setting out the policies and objectives on infrastructure for the LAP.

## 4.8.2 Water Supply (a) Sources and (b) Network

### a) Water Supply Sources

Water supply for the Naas Road area is part of the dublin region water supply which is sourced from the Liffey, Dodder and Vartry rivers and is an integrated network covering Dublin City and adjoining counties. Currently across the region supply and demand for high quality drinking water is finely balanced and this will remain the case in the short to medium term pending the delivery of a number of projects to increase production, storage and delivery capacity. Projects being implemented include pipe renewal across the region to reduce leakage as well as demand management measures to encourage water conservation while the provision of a suitable long term new supply source for the Dublin & mid-Leinster area is being investigated.

The Water Services Act 2007 provides for the conservation of water where leakage occurs due to un-repaired pipes or equipment, or where poor management results in wastage or excessive consumption of water.

Drinking water comes from various different sources such as lakes, rivers, streams, springs and boreholes. Depending on the quality of its source, water will almost certainly have to be treated to make it safe to drink. All water supplies for consumption must meet standards laid down by the EU. They must be free from micro-organisms, parasites, and any substances that endanger public health if found in sufficient numbers or concentrations. Water quality may be affected from a number of different sources, including during times of flooding, if rainfall is low increased agricultural or residential development, breakdowns in treatment process, power outages, lack of proper filtration or disinfection equipment etc, and sometimes poor water quality is due to the water being drawn from an unsuitable source.

Dublin City Council is responsible for maintaining the public mains systems and ensuring the quality of the water they distribute. The Environmental Health section in each Local Health Office monitors water supplies on behalf of the local authority to make sure that all water sources meet the required public health standards. The HSE is also responsible for monitoring the fluoride content of public water supplies. The Environmental Protection Agency (EPA) produces a yearly report on the quality of drinking water in Ireland. This report contains information from each local authority about the monitoring of the various water supply schemes in its area. The EPA has enforcement powers in relation to drinking water quality. These powers require public water suppliers (mostly local authorities) to notify the EPA and the HSE where there is a potential risk to human health, and to comply with their directions

### b) Water Supply Network

At a local level the existing water supply network for the Naas Road is served by a trunk 750mm watermain which runs diagonally through the area from Robinhood to Bluebell. There is a connection off this watermain where it crosses the Long Mile Road and the area is generally fed from this connection via a network of smaller pipes. To cater for future development investment will be required to enable the installation of a significant number of new watermain in the Walkinstown Avenue/Kylemore Road/Naas Road/Old Naas Road areas.

Given the circumstances of this watermain and the fact that it passes through a number of large potential development sites, consideration could be given to the possible diversion of this watermain. Such a diversion would be at the expense of the developer(s).

In addition, a 1200mm arterial watermain runs near the eastern boundary of the LAP in Landsdowne Valley Park. This watermain is a bulk supplier of water to the general city area.

New development and/or works and landscaping will need to demonstrate that the existing network and associated wayleaves are protected from impacts which could put the network at risk of damage.

Alongside ensuring adequate supply, this LAP will entail the delivery of a number of measures to sustainably manage water demand. New developments and upgrading of existing development will need to install suitable water conservation measures including the use of rainwater harvesting and greywater recycling for example.





#### 4.8.3 Waste Water Network & Treatment

The Naas Road Local Area Plan drains to two separate catchments. Most of the area is connected to the Grand Canal Tunnel catchment with a small area at the northern end connected to the City Centre catchment. Both catchments ultimately discharge to the Regional Waste Water Treatment Plant at Ringsend. At the time of preparing this LAP, this facility is operating at its design capacity. Dublin City Council, is currently finalising proposals to increase capacity of the plant at Ringsend from 1.7 million PE (population equivalent) to 2.1 million PE, with a target completion date of 2015.

In 2010, the Environmental Protection Agency granted a Discharge Licence to Dublin City Council under the Waste Water Discharge (Authorisation) Regulations (2007). Dublin City Council must comply with the conditions of this discharge licence. The ultimate objective of this licence is to restrict discharges from the wastewater network into rivers and waters. Also under the River Basement Management Plan approved by Dublin City Council in 2010, all waters are to achieve "good" status, by 2015. This places statutory requirements on Dublin City Council to improve the status of the rivers within the city. The 2007 Regulations also require that the Water Service Authority satisfies itself that there is drainage capacity available in the network prior to granting a planning permission for any development. This requirement will apply to all developments within the LAP.

The drainage network in this area is a partially separate system in which foul sewage, together with some surface water is carried by an individual system of sewers to the Grand Canal Tunnel sewer and the balance of the surface water is collected in an independent system of surface water sewers ultimately discharging in to the River Camac. As the pipe network in the city centre catchment area is flowing at capacity, all new flows will be directed to the Grand Canal Tunnel through the 9B sewer serving the area. There are many misconnections of foul sewers to surface water infrastructure in the old industrial brownfield sites that make up much of this area. Any new developments in these areas will require new separated foul and surface infrastructure.

Although the River Camac runs through the eastern part of this LAP, there is a very limited surface water network connected to it. Most of the surface water pipes in the area discharge to combined sewers. It is not sustainable to allow storm water flows continue in the combined system as the cost of pumping and then treating 'clean' storm water is significant. The storm water flow should be separated out using modern sustainable drainage systems. All new developments will be required to implement these principles by treating their storm water flows on site to ensure volumetric reduction and qualitative improvement of the storm flows. Examples of systems include soakaways and rainwater harvesting. ( Please see [www.irishsuds.com](http://www.irishsuds.com) for more detail ).

The scale and phasing of new development will need to be cognisant of and in keeping with the capacity available at Ringsend Treatment Plant and be compatible with local sewer capacity constraints. To cater for future development, investment will be required in the foul sewer network to link development sites to the Grand Canal Tunnel sewer.

#### 4.8.4 Storm Water Management and SuDS

In keeping with the Greater Dublin Strategic Drainage Study (2005), Sustainable Drainage Systems (SuDS) techniques will be incorporated into the development. The drainage strategy for the site will also take due cognisance of the objectives of the Flood Resilient City Project, which promotes an integrated approach to flood risk management. This project promotes Awareness, Avoidance, Alleviation and Assistance' when considering pluvial flood management.

All developments must provide suitable measures to ensure that the quality of runoff from roads, paved areas and roofs is improved by incorporating the following: Retention ponds, green roofs, wetlands, rainwater harvesting, filter drawings, infiltration trenches, permeable paving, detention ponds and swales. Each section and phase of the development within the LAP lands must demonstrate to the satisfaction of Dublin City Council, that water quality improvement measures are adequately provided. Surface water attenuation will be provided generally in locations identified in the SuDS Strategy. Design of surface water attenuation shall be based on the requirements of the Greater Dublin Strategic Drainage Study. Particular reference shall be made to Appendix 2 which provides guidance on attenuation design and best practice cases.

As part of the implementation of the local area plan, Dublin City Council will seek to remove the storm runoff from the combined system. In some cases, this will require new surface water pipes to be constructed. Any development in this area will be expected to manage surface water in accordance with modern sustainable principles to minimise peak flows in the system, for example, green roofs or rainwater harvesting. A SuDS strategy has been outlined for the local area plan to ensure that the level of development proposed can be dealt with adequately.

The following SuDS measures shall, where feasible, be incorporated into the development in line with appropriate sustainable drainage practices:

- a) Infiltration systems including infiltration trenches, infiltration basins, permeable paving, soakways, green roofs and green gardens,
- b) Filtration systems, including swales, bio retention systems and filter strips,
- c) Retention systems including retention swales,
- d) Detention systems including underground tanks, underground attenuation, detention basins and filter drains
- e) In addition to the above, in extreme storm events, flood waters can be accommodated by designing landscaped areas to flood temporarily and thus control the rate of outflow from the site.

For smaller development the following drainage requirements are sought:

- Permeable paving
- Rainwater harvesting
- Use of appropriately designed soakways.

#### Note:

*There should be early consultation with Parks & Landscape Services Division in relation to SuDS proposals for parks and public realm including my proposed green spaces.*



4.8.5 Flood Risk Management

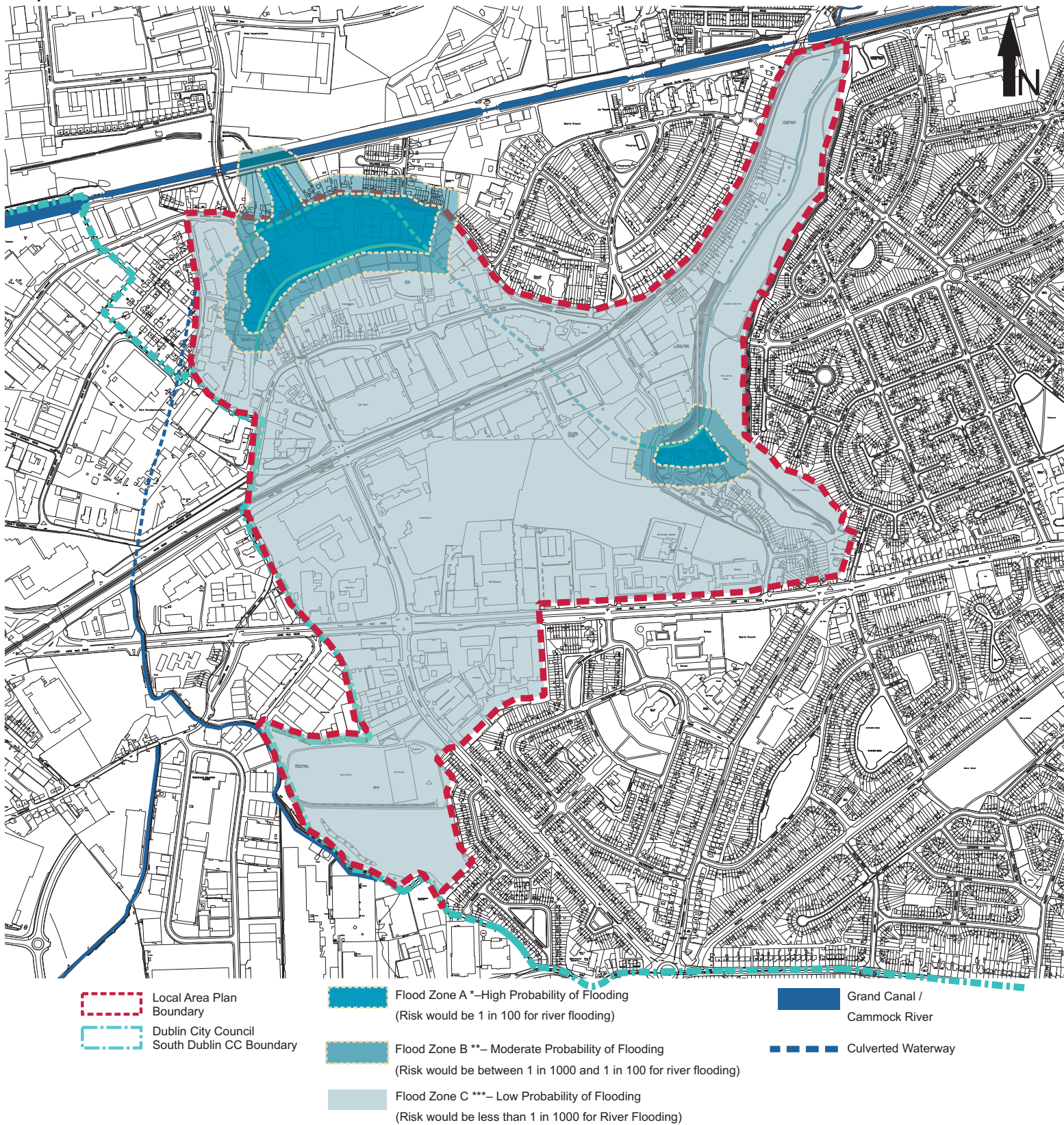
Accompanying this Local Area Plan is a flood risk assessment (see Appendix 1), which includes a number of measures necessary to ensure assessment of flood risk is incorporated into the LAP. Two main types of flood risk are identified in the Naas Road lands namely fluvial flooding (rivers), and pluvial (rainfall). The River Camac runs through the LAP, flowing from a rural part of South Dublin through the Naas Road Lands to Dublin City Centre discharging into the River Liffey. This river is prone to flooding in certain areas. In preparing a flood zone map, the most suitable and most recent source of information is the Catchment Flood Risk Assessment and Management Studies (CFRAMS) which are being carried out by Dublin City Council and adjoining authorities in conjunction with the OPW. The CFRAM maps for this area have not been completed.

In the absence of the CFRAMS maps, the main information to be used for the flood mapping comes from the Greater Dublin Strategic Drainage Study which shows the 1 in 100 year flood event. The main flood risks identified in the GDSDS are flooding points 11 to 15 which refer to 100 year flooding of portions of Lansdowne Valley Business Park, Riversdale Industrial Estate, Bluebell Avenue, Sheldon Park Hotel (although some river widening has been carried out subsequently) and Kylemore Road. The main risk to the Naas Road Area would be from both pluvial and fluvial flooding. All the areas identified above would be in Zone A when referring to the National Flooding Guidelines. The GDSDS did not carry out a 1,000 year flood extent map so Zones B and C cannot be accurately delineated until flood map outputs from the Eastern Region Catchment Flood Risk Assessment & Management Study are received around the end of 2013, however any development adjacent to Zone A must be considered to be in Zone B unless disproved by hydraulic analysis.

For the purposes of this study an indicative 20m band outside the Flood Zone A has been identified which will act as an interim estimate for Flood Zone B.

Dublin City Council will aim to steer new development to areas with the lowest probability of flooding. The flood Risk Assessment has identified flood risk areas, and identified three different flood zones, namely Flood Zone A, Flood Zone B and Flood Zone C. Development will occur within the LAP lands according to the policies, objectives and development management standards set out in this plan. It is the strategy of Dublin City Council to reduce the potential risks to people, property and the environment caused by flooding, through a hierarchy of avoidance, followed by substitution of lower vulnerability uses and, only if avoidance and substitution are not possible, reduction and management of the risks through a variety of techniques.

Map 4.8 Flood Risk Areas





#### 4.8.6 Water Quality

Recent years have seen the adoption of a number of EU Directives, transposed into Irish Law which seek to protect and improve water quality. These impact on groundwater, rivers, lakes, canals, estuaries and streams. For this LAP the most significant document is the Eastern River Basin District plan which sets out a series of targets for improvements in river water quality to bring it to good status by the end of 2027 across the wider Greater Dublin area which makes up the catchment of the Liffey, Tolka, Dodder, Boyne, Avoca, Vartry Rivers and a number of smaller rivers in this geographical river catchment area.

The Naas Road LAP area contains the river Camac (called Cammock in the ERBD plan) which flows from a rural part of South Dublin through the Naas Road Lands to Dublin City Centre discharging into the River Liffey. The river quality within the LAP area (River Cammock) has been classified under the Water Framework Directive River Status as having 'Poor' Status in June 2011. The EPA's River Monitoring Programme also classifies the River Camac (Cammock) as 'Q3 Poor' status. Maintaining and improving water quality in the river to a good status is a key consideration for the LAP. Alongside improving water quality within the river, it is also an aim of the LAP that the Camac becomes an important wildlife habitat within and around the river, boosting biodiversity in the area and providing an attractive amenity for the surrounding communities. For the Camac the problems identified are low ecological rating, inferior habitat, and fish migration impedances. Also impacting on the water quality of the river is wastewater and industrial discharges, where foul sewers are misconnected to a pipes discharging into rivers instead of sewers.

The redevelopment of sites within the LAP provides an opportunity to improve water quality alongside continuing control measures such as Trade Effluent Discharge Licences and implementation of the Water Framework Directive.



#### 4.8.7 Regulatory Compliance

There are two overarching statutory requirements that govern drainage works and water quality. These are the River Basin Management Plan (RBMP) 2009 and the Discharge Licence, ( covering the Greater Dublin Agglomeration), issued by the Environmental Protection Agency (EPA) in July 2009.

As both these programmes are ultimately about improving, or maintaining, water quality in the receiving rivers and in Dublin Bay, all Local Plans must be aligned with these two programmes so as to ensure sustainable development takes place.

Both these programmes contain a mixture of major capital schemes, operational programmes and planning control.

The stated objective of the RBMP is to bring all waters to good status. To achieve this objective there is a regional programme of measures and underlying actions that are being implemented by the relevant stakeholders such as the local authorities , Office of Public Works , etc. The Discharge Licence, issued and enforced by the EPA, covers all discharges to waters from the wastewater network with a view to ensuring no negative impacts arise. It also requires local authorities to satisfy themselves with respect to drainage capacity in the area before granting any planning permissions.

In the case of proposed new developments, bearing in mind the statutory obligations outlined above, Dublin City Council requires the implementation of holistic drainage policies, including stormwater management and SuDs, in all new developments.

#### 4.8.8 Groundwater

The protection of groundwater has become an issue of growing importance as it is a non renewable resource. There is a requirement under the Local Government (Water Pollution) Act 1977 to register groundwater abstractions, which is managed by DCC Drainage Division. The European Communities (Drinking Water) (No. 2) Regulations 2007 confers stringent responsibilities on a Water Supplier to ensure that the water supply complies with acceptable qualities and standards. The proposal must comply with the Water Framework Directive and with the River Basin Management Plan of the Eastern River Basin District. Please refer also to the ERBD Final Background Policy, Legislation and Authorities Report as well as the Water Matters report (with particular reference to threats to groundwater quality). Both are published on [www.erbd.ie](http://www.erbd.ie).

#### 4.8.9 Utilities

The Naas Road LAP environs is currently serviced by the necessary electric, gas and telecommunication infrastructure and can support the expected increase in population and intensification of economic activity. It is expected that upgrading as and when required of each network will take place at a local level to meet growth in demand and that these upgrades will be delivered by individual service providers.

##### 4.8.9.1 Electricity Supply

There are a number of high voltage cables running through the LAP lands, which consist of a double circuit 110kV line and a single circuit 38kV line, originating in the Inchicore 110kV substation. The 38KV and in particular the 110KV power lines impose restrictions with regards to development and visual amenity of the area. There is an 80 metre restriction corridor around the 110kV line, (i.e 40m corridor each side).

As part of implementation of the LAP It is the preferred option that the power lines are placed underground. The route for undergrounding the cables will be assessed by ESB Networks as part of the overall interaction with the applicants/developers, and in that event the cost of the undergrounding of the lines including associated civil works would be borne by the developer(s).

Given the scale of development ultimately proposed over the lifetime of the LAP, a new HV substation would be required to meet the level of demand. This substation will be located within the LAP lands.





4.8.9.2 Telecoms & Broadband

Broadband and telecom services are available in the area, with a number of service providers offering broadband and integrated telecoms services.

New development in the LAP area shall accommodate the provision of a universal open access ducting network to support telecommunications, broadband and digital. All arrangements for exchange buildings, communications, towers containing antenna, dishes, etc shall be agreed in advance in order that their location, design and access thereto is compatible with the design strategy for schemes and the area.

4.8.9.3 Gas Supply

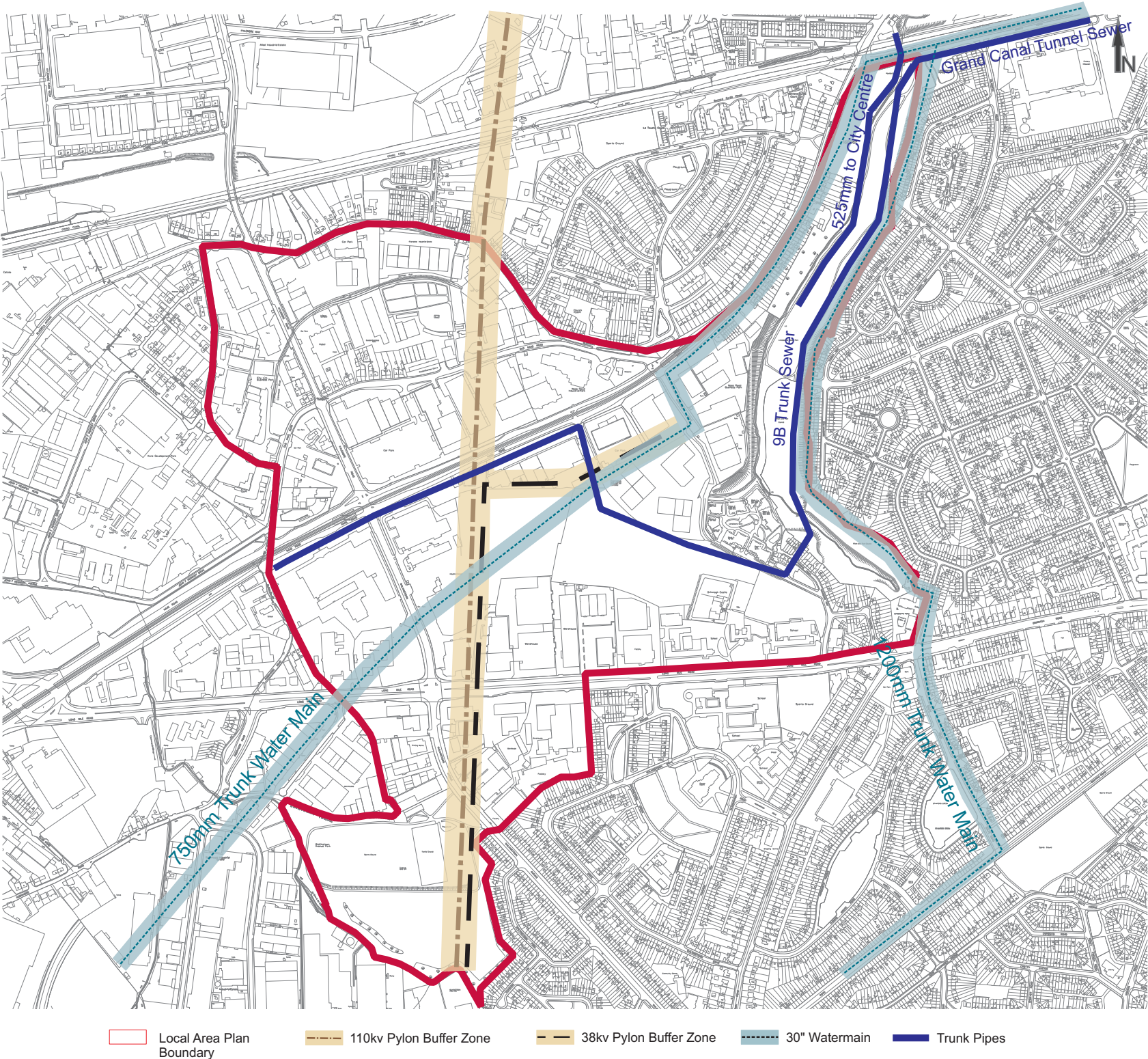
The pipeline connection for the Naas Road Area was sized to accommodate growth in gas demand from local business and residential users over a ten year period. There is adequate capacity to supply gas to additional local business and residential users with the result that Bord Gáis Networks is not planning extensive further development of the gas network in the area at this time. There is a potential upgrade to Kylemore Above Ground Installation (AGI) within the period 2012/13 to 2016/17. This may involve a new AGI / UGI (under ground installation) in close proximity to the existing AGI at Kylemore and a new pipeline from Walkinstown AGI.

Future development of the network to cater for gas demand which was unforeseen in the original study will be treated under the terms of the Gas Connections Policy. As part of the redevelopment of the LAP lands, It will be necessary to contact Bord Gais Networks before carrying out any work in proximity to gas infrastructure and this is of particular importance in respect of transmission mains. No development shall be allowed over gas mains and all proximity requirements must be adhered to. For information on these contact must be made with Bord Gáis Networks.

4.8.10 Waste Management

Waste Management is concerned with the generation, collection and disposal of waste. The Waste Management Act 1996 defines waste as ‘any substance or object which the holder discards or intends or is required to discard.’ Delivery of the objectives of the DCC Waste Management Plan will be implemented through the development management process by accommodating recycling facilities for new residential and commercial developments.

Map 4.9 Existing Utilities within Naas Road Lands





4.8.11 Seveso Establishments

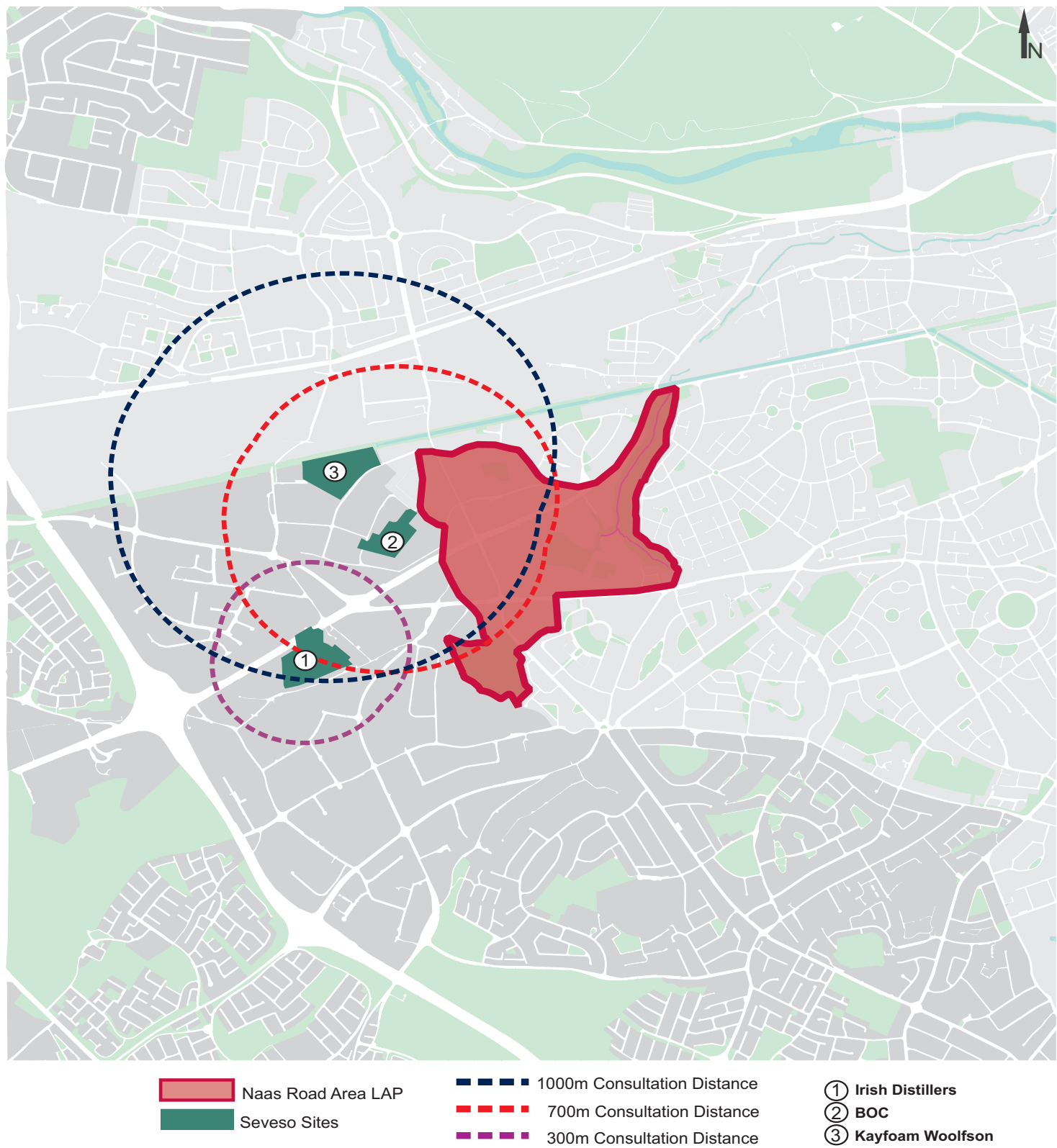
There are three Seveso establishments in the vicinity of the LAP area. In preparing a local area plan, it is a statutory requirement to consult the Health and Safety Authority (HSA) with regard to such establishments. The HSA, as the competent authority will then advise as to the appropriateness of the proposed development and ensuing societal risk from an accident on a scale from low to high. Such advice may have a bearing on the scale and type of development permissible.

The sites along with their respective designated consultation zones are as follows:

- 1. Irish Distillers Robinhood Road, Clondakin, Dublin 22 (300m consultation zone)
- 2. BOC, Bluebell Industrial Estate, Dublin 12 (700m consultation zone)
- 3. Kayfoam Woolfson, Bluebell Industrial Estate (1000m consultation zone)

South Dublin County Council Development Plan 2010 – 2016 includes a number of policies which promote the relocation of Seveso activities in an incremental fashion from areas proposed for higher density mixed use developments, though any future development may be contingent on implementation of this policy and / or identification of appropriate alternative locations for Seveso establishments.

Map 4.10 Seveso II ( COMAH )





### Infrastructure and Water Management Policies

- IW1.** To actively seek the funding and delivery of key infrastructure including water supply and waste water to enable development in the Naas Road Local Area Plan.
- IW2.** To ensure that development is permitted in tandem with available water supply, waste water treatment and network capacity. To manage and phase development so that new schemes are permitted only where adequate capacity or resources exist or will become available within the life of a planning permission.
- IW3.** To require that all large development proposals include water conservation and demand management measures.
- IW4.** To protect existing infrastructure by ensuring through consultation with Dublin City Council that buildings and structures will be designed and constructed so that they do not compromise the structural integrity of trunk watermains in the area, drainage pipes, gas mains, overhead cables, and other services.
- IW5.** To seek to improve water quality and meet the objectives of the Eastern River Basin District Management Plan by ensuring the separation of foul and surface water effluent through the provision of separate sewage networks in any new permission, and ensure the implementation of a stormwater management system in the detailed design of the plan lands, following the principles of Sustainable Urban Drainage Systems (SuDS).
- IW6.** To encourage provision of suitably high quality strategic telecommunications including fibre optic, broadband links and utilities (inc. gas and electricity) infrastructure within the local area plan.

### Infrastructure and Water Management Objectives

- IWO1.** To seek the undergrounding of 110 KV and 38KV high voltage overhead cabling transversing the LAP area. The route for undergrounding the cables will be assessed by ESB Networks as part of the overall interaction with the applicants/developers, and in that event the cost of the undergrounding of the lines including associated civil works would be borne by the developers.
- IWO2.** To provide a new HV substation as part of the redevelopment of the LAP lands to meet the level of demand. A suitable location for this to be provided for in the LAP area.
- IWO3.** To promote the achievement of good ecological status, good ecological potential and good chemical status for the River Camac by 2027, in accordance with the Water Framework Directive.
- IWO4.** To implement the programme of measures for the River Camac set out in the Eastern River Basin District Management Plan 2009 - 2015
- IWO5.** To require all relevant proposed developments to carry out a site specific Flood Risk Assessment in accordance with the Departmental Guidelines on Flood Risk Management and Appendix A1 of this plan. The flood risk assessment shall accompany the planning application and should be sufficiently detailed to quantify the risks and the effects of any residual mitigation/adaptation together with the measures needed to manage residual risks.
- IWO6.** All planning applications shall be required to submit a surface water drainage plan which will include proposals for the management of surface water within sites, protecting the water quality of the River Camac and retrofitting best practice SuDS techniques on existing sites where possible.
- IWO7.** Each of the key sites identified in Chapter 5 must provide for local recycling facilities. Large retail sites must provide a glass recycling facility.
- IWO8.** To implement, in conjunction with the Health and Safety Authority (HSA), the provisions of the Seveso II (COMAH) Directive and to have regard to the provisions of the directive and the recommendations of the HSA in the assessment of all planning applications located on or impacted by such sites.



## Green Infrastructure, Bio-Diversity & Natural Heritage

### 4.9.1 Introduction

Green Infrastructure (GI) can be broadly defined as “a planned network of multifunctional green spaces and inter-connecting links which is designed, developed and managed to meet the environmental, social and economic needs of communities”. It includes public parks, recreation areas, remnant vegetation, residential gardens, street trees as well as innovative and emerging new urban greening technologies such as green roofs and green walls.

Green infrastructure aims to address legislative and policy requirements in an integrated way across a range of issues, including biodiversity, open space, flooding, surface water management (SuDS) and cultural heritage. Green infrastructure provides multiple social, environmental and economic benefits, which reinforce the character of a place. The adoption of a green infrastructure approach can contribute greatly to the effectiveness of a local area plan.

The Dublin City Development Plan 2011 – 2017 includes specific objectives relating to biodiversity, amenity, transport and water treatment, all of which underpin a Green Infrastructure approach. Chapter 6 of the City Development Plan, “*Greening the City*” sets out a detailed policy framework for the delivery of Green Infrastructure through a spatial strategy, which promotes an increase in public amenity space in tandem with improvements in the quality of biodiversity of the city. This builds on previous work including Dublin City Heritage Plan 2002–2006 (under review).

The Naas Road plan area is rich in biodiversity and contains a number of water courses. The Camac River, Walkinstown Stream, Robinhood Stream and Bluebell Stream all transverse the study plan area. These watercourses support a broad range of biodiversity including fish invertebrates and plant life.

The plan area contains a broad range of terrestrial biodiversity ranging from formal parks, a cemetery, and walking and cycling routes. There are a number of derelict sites which also act as a biodiversity resource and Drimnagh Castle supports a wide range of biodiversity in terms of a wetland area, tall grasses, a formal garden and trees. Lansdowne Valley Park also is rich in grasslands, woodland, river, scrub & hedgerows, while Walkinstown Park and Bluebell cemetery are also important for their biodiversity.

**Map 4.11 Strategic Green Network - Dublin City Development Plan 2011 - 2017**



The key green infrastructure challenge for the Naas Road LAP is to provide a spatial strategy that provides for greater connectivity between the substantial amounts of green space that exists in the area in order to capitalise on existing assets. This can be achieved through the development of a number of strategically located brown field sites which enable the reclamation of spaces from car storage and industrial land uses to create walking and cycle linkages for pedestrians and cyclists through existing parks. It is also the goal of the LAP to de-culvert the River Camac and to place the river within a green setting. The opening up of the River Camac provides a great opportunity to rediscover the former landscape and celebrate its industrial heritage. This ambitious intervention also has the potential to contribute to SuDS, Flood Risk Management and improvement of water quality in the area.





#### 4.9.2 Sustainable Urban Drainage Systems

The redevelopment of sites presents opportunities to improve the quality of water discharges by implementing SuDS measures. Sustainable Urban Drainage Systems (SuDS) are a series of management practices and control structures that aim to mimic natural drainage, reduce flood risk, improve water quality and provide amenity through the use of permeable paving, swales, green roofs, rain water harvesting detention basins, ponds and wetlands. SuDS can achieve multiple objectives such as removing pollutants from urban run-off at source, controlling surface run-off from developments and ensuring flood risk does not increase further downstream. Furthermore SuDS can offer the opportunity to combine water management with green space, which can increase amenity and biodiversity.

The redevelopment of the LAP lands provides the opportunity to incorporate a number of SuDS features into the sites. Applications for developments on large sites (0.2Ha or over) should be accompanied by a package of proposed measures addressing the following:

- Infiltration – for water soakage into ground through use of trenches, basins, and permeable paving
- Filtration – in order to capture pollutants by devices such as swales and bio retention systems.
- Constructed Wetlands - To reduce run-off and enhance bio-diversity by using stormwater wetlands.
- Retention –To retain pollutants through the use of retention ponds.
- Detention – To reduce run-off through devices such as detention basins, filter drains.



**Boulevard example incorporating Porous Pavement with Storm Water Attenuation**

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#### 4.9.3 Green Infrastructure Strategy

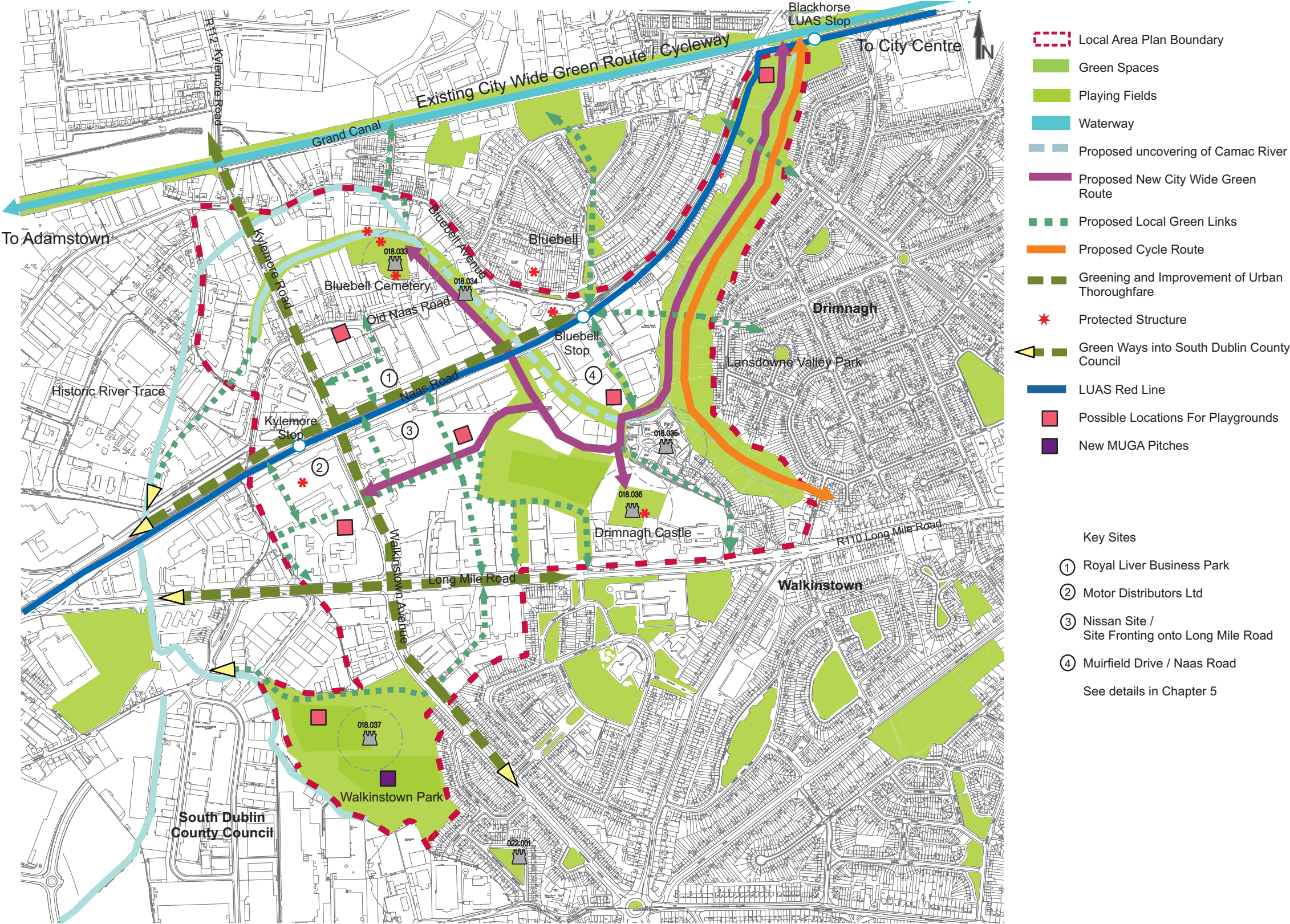
The main aim of the Green Infrastructure Strategy is to create a linked network of strategic open spaces. This will focus on:

- **Biodiversity** - by focussing on the existing Green Infrastructure potential of the existing parks/ amenities, (such as, Drimnagh Castle, Lansdowne Valley Park, Walkinstown Avenue Park, Bluebell Cemetery), developing the Green Infrastructure potential of derelict sites, tree lines and private gardens and developing and exploiting potential linkages with areas of food production (e.g small gardens, Drimnagh Primary School, Drimnagh Castle)
- **Amenity**- by exploiting the Green Infrastructure potential of areas of high environmental quality and amenity within and adjoining the study area (e.g. Lansdowne Valley Park, Drimnagh Castle, Walkinstown Park, Bluebell Cemetery and the Grand Canal);
- **Movement** - By improving existing pedestrian environment, in particular, its accessibility and connectivity between Lansdowne Valley Park and Drimnagh Castle and adjoining residential areas, exploiting the existing public transport network (Luas Red line and Dublin Bus routes, inter-urban bus services) and addressing the isolation of Naas Road/ Kylemore Road from major green spaces .(Lansdowne Valley Park, Drimnagh Castle, Walkinstown Park, and Grand Canal),
- **Water Resources** - By exploiting the Green Infrastructure potential of existing watercourses of the Camac, Walkinstown Stream, Robinhood Stream and Bluebell Stream, in terms of fish and plant life, and acknowledging the influence of the Camac River on settlement pattern and character of the area.
- **New Connected Routes** -Included in the LAP strategy are a series of new connected routes , particularly (i) boulevards & (ii) new pedestrian/cycle green links. These connective routes are a vital part of the green infrastructure network as both will be required to provide attractive planted paths and avenues. These tree lined routes will implement SuDS techniques and through selective planting provide strong biodiversity value to the new developing areas. The rehabilitation of existing streets will also be expected as part of site redevelopment to provide a new attractive street frontage, incorporating tree planting, high quality paving and integrated SuDS. The proposed location of these 'green routes' are shown in Green Infrastructure Strategy Map.





Map 4.12 Proposed Green Infrastructure Strategy





## Green Infrastructure, Bio-Diversity & Natural Heritage Policies

- GI1.** To seek opportunities to increase the provision of tree planting on streets within the LAP and to improve amenity, increase opportunities for wildlife and contribute to improvements in air and water quality and water attenuation
- GI2.** To ensure that in new residential developments, public open space is provided which is sufficient in quantity and distribution to meet the requirements of the projected population including play facilities for children.
- GI3.** To support the provision of community gardens, allotments, local markets, pocket parks, where feasible and in particular as temporary uses on vacant under utilised or derelict sites in the LAP lands.
- GI4.** To promote the development of soft landscaping in public open spaces, where feasible, in accordance with the principles of Sustainable Urban Drainage Systems.
- GI5.** To provide for publicly accessible open spaces and green infrastructure which contribute to the amenities of the area and the green network.
- GI6.** Encourage the development of podium and courtyard gardens as part of the provision of semi-private and private open space within the LAP to increase opportunities biodiversity and the enhancement of the local environment.
- GI7.** To support and liaise with South Dublin County Council in relation to their open space strategy proposed in the 'Naas Road Development Framework Plan (2010), and to support continuity of linkages across the administrative boundary.
- GI8.** To recognise the importance of Drimnagh Castle and protect views and vistas, and to improve linkages to the Lansdowne Valley park.
- GI9.** To support and promote Biodiversity and to support the National Biodiversity Plan 2011 – 2016 and the current Dublin Biodiversity Action Plan 2008-2012. (under review)
- GI10.** Any plan or project with the potential to give rise to significant direct, indirect or secondary impacts on a Natura 2000 site(s) shall be subject to an appropriate assessment in accordance with Article 6(3) of the Habitats Directive.
- GI11.** 'To conserve priority species, habitats and natural heritage features identified in the Dublin City Biodiversity Action Plan 2008 – 2012 for priority conservation measures ( This plan is currently under review).'

- GI12** To protect areas of particular flora, fauna and habitat value that have no specific designation but nonetheless contribute to the environmental and ecological diversity of the area and require recognition as such and for all development to be in accordance with policies GC26, GC28 and GC30 of the Dublin City Development Plan 2011-2017.

## Green Infrastructure, Bio-Diversity & Natural Heritage Objectives

- GIO1.** To continue to implement biodiversity enhancement plans for Lansdowne Valley Park, Walkinstown Park and Bluebell Cemetery.
- GIO2.** To implement restoration works in Lansdowne Valley Park which could include removal of concrete channel from the river, reinstatement of natural riverbank vegetation or perhaps an area of wetland, and continue the control of invasive species including the removal of Japanese knotweed as a priority.
- GIO3.** To look into ( see note at base ) the feasibility of relocating the existing pitch and putt course at Lansdowne Valley Park and provide a high quality pedestrian and cycle route, linking the Grand Canal (pNHA) along Davitt Road, through Lansdowne Valley Park, and linking up with the Long Mile Road. This combined cycle/pedestrian route should address security, public lighting and securing of back gardens. 'An ecological survey including a study of rare/protected species shall inform these works'.
- GIO4.** All proposals should incorporate the principles of Sustainable Urban Drainage Systems (SuDS) in accordance with the requirements and standards of the City Council's Environment and Engineering Department – Drainage and Wastewater Services Division.
- GIO5.** To designate Lansdowne Valley Park as an outdoor resource centre in light of its varied habitats and potential to learning in a number of disciplines. To this end the Council will engage the interests and energy of the local communities, schools and in particular the educational expertise of the City of Dublin VEC.
- GIO6.** To facilitate the use of Lansdowne Valley in accordance with the provisions set out in the Drimnagh Integrated Area Plan (June 2009), including (i) to create a safe and accessible heritage park connecting the canal to Drimnagh Castle (ii) To improve security and passive surveillance of the park and integration with adjacent development areas (iii) to protect and enhance the setting of Drimnagh Castle (iv) to protect the bio-diversity of the park and Camac River,

and (V) To open up existing or blocked off connections through Lansdowne Valley Park to improve connections to Drimnagh Village, and the recently upgraded cycleway along the Canal and the Luas Stop at Blackhorse Avenue

- GIO7.** To pilot and test new green infrastructure installations in the public realm to boost biodiversity and improve surface water management on a number of streets within the LAP area; including the use of permeable materials for surfaces, planted roofs and provision of storm water tree trenches.
- GIO8.** To look into the feasibility of de-culverting sections of the Camac River, when and if sites come up for redevelopment.
- GIO9.** To carry out a study on the feasibility of placing appropriate flood management structures in the River Camac in the Lansdowne Valley Park and the creation of a new wetland area/flood alleviation scheme. Consultation will be carried out with the National Parks and Wildlife Services, Inlands Fisheries Ireland and other bodies as appropriate.
- GIO10.** To continue to develop Walkinstown Park in accordance with objective GC040 of the Development Plan, including (i) remove the derelict tarmac surface, (ii) provide for two MUGA pitches, (iii) provide a large diverse playground to meet the recreational needs of the local community, subject to available funding, (iv) increase the biodiversity landscaping particularly along the river and (v) seek funding to develop a skate park.
- GIO11.** To support the Drimnagh Sli na Slainte route from the Grand Canal through the Lansdowne Valley Park as part of the Drimnagh Smarter Travel Plan, and to encourage this route as a new Sports Spine, & Heritage Trail through the Park, linking up with the Grand Canal and wider city green routes, and Drimnagh Castle
- GIO12.** During construction/redevelopment of any sites, developer(s) shall ascertain the extent, if any, of invasive species, and shall demonstrate measures for their control/removal.
- GIO13.** To replace all trees removed with an appropriate species, where the removal of street or roadside trees is necessary.

*Note:*

*Park and Landscape Services are developing Long Meadows Pitch & Putt course, (located about 2 Km away) as a regional high quality course for the South Central Area including Ballyfermot, Inchicore, Chapelizod and Drimnagh*



4.10 Civic Infrastructure

4.10.1 Introduction

One of the Six Themes of the City Development Plan (2011 – 2017) is the Social Theme : *to develop Dublin city as a compact city with a network of sustainable neighbourhoods which have a range of facilities and a choice of tenure and house types, promoting social inclusion and integration of all ethnic communities.*

As detailed in Section 2 of this plan, the area itself contains little in the way of physical, social and educational infrastructure with the main infrastructure consisting mainly of a primary and secondary school adjacent to Drimnagh castle, crèches in Lansdowne Gate and in Lansdowne Valley, a mobile library service, a pitch and putt facility within Lansdowne Valley Park and sports pitches within Walkinstown Valley Park. Outside of the plan area community facilities are more numerous given its established residential nature. Immediately adjoining the plan area are a number of schools along Long Mile Road, a small primary school along Robinhood Lane to the west of the plan area and a recently developed community centre, Bluebell Community Centre, off Bluebell Road. (see section 2 for more detail).

4.10.2 Social Infrastructure

‘Social Infrastructure’ refers to the physical infrastructure necessary for a successful neighbourhood and includes cultural, sports & leisure, educational, childcare and play facilities. The provision of social infrastructure necessitates an inter-agency approach to ensure the swift delivery of same.

Given the shortfall of social infrastructure identified in this plan area, it is imperative that a high level of infrastructure is provided in a timely manner to cater for the increase in population proposed under this plan. The facilities should also be accessible by existing residential communities in the wider area, including Bluebell, Walkinstown and Drimnagh, as well as those future residents that will be attracted to live in the LAP area. See table below for quantum of social infrastructure proposed under this plan

| Core Strategy | Lifetime of the LAP | 15 - 20 yr+ Timeframe |
|---------------|---------------------|-----------------------|
| n/a           | 2,500 sq.m.         | 10,000 sq.m.          |

Planned Community Floor Areas

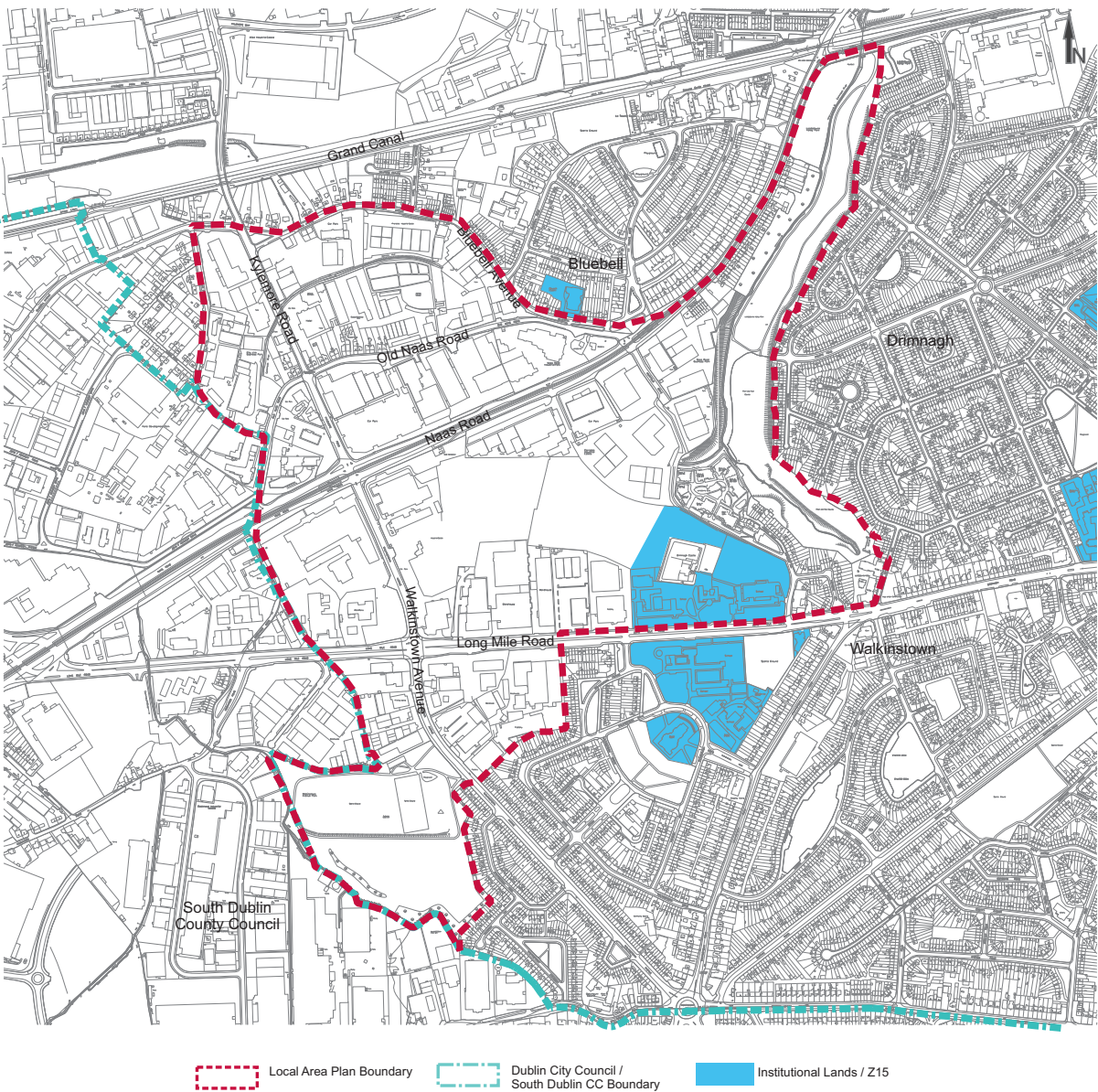
Under this LAP, provision of social infrastructure will be primarily by way of planning gain as part of the redevelopment of privately-owned sites, and in particular those identified key sites, in the area and through the development levy scheme. Facilities such as a library, community centre, cinema, theatre, crèches and play spaces, health and sports facilities and facilities for the elderly could be provided through the redevelopment of key sites to address the current shortfall in the area and meet the needs of the future population planned for. The city development plan places emphasis on institutional lands as an important community resource.

This plan area contains some 5 hectares of institutional lands (zoned Z15) located north of the Long Mile Road accommodating Drimnagh Castle Christian Brothers School (CBS). In limited circumstances, development may be permitted on these Z15 lands on a once-off basis where it has been demonstrated some lands have become surplus to requirements and that some development is necessary to secure, protect and consolidate the educational/community uses on site. In addition, in the event that it is demonstrated that the Z15 lands are no longer required for current or future educational or community uses and that the lands are proposed to be comprehensively redeveloped, a detailed masterplan to accord with development plan standards will be required.

The city development plan also contains specific objectives for Lansdowne Valley Park i.e. (i) to promote the use of Lansdowne Valley as an outdoor resource centre and (ii) to facilitate the use of Lansdowne Valley from Inchicore to Drimnagh Castle – in accordance with the provisions set out in the Drimnagh Integrated Area Plan (June 2009). This LAP will promote the implementation of this objectives.

The plan area is also recognised as an area that is capable of accommodating those leisure uses that require large footprints and above average car parking levels, such as ice-rinks, roller skating discos, children’s activity gyms and playspaces etc. Such uses will be encouraged, particularly on an interim / temporary basis pending the redevelopment of key sites.

Map 4.13 Institutional Lands





#### 4.10.2.1 Childcare Facilities

The Dublin City Childcare Committee Audit and Needs Analysis (2006) found that this LAP area (EDs of Walkinstown A and Inchicore B) and its surrounds are poorly served by childcare facilities.

This LAP seeks to facilitate the provision of quality, easily accessible childcare facilities throughout the LAP area in those areas zoned for social, economic and physical rejuvenation and for community uses (Z14 and Z15), and in particular in proposals for residential, employment and educational developments. These facilities should be sustainable, fit-for-purpose and easily accessed by users of all ages. For all new residential schemes in excess of 75 units, one childcare 20-space facility will be required (and a pro-rata increase for developments in excess of 75 units). Regard will be had to the Dublin City Childcare Committee and their identification of areas that are under-provided or over-provided in terms of childcare provision.

#### 4.10.2.2 Play Spaces

The City Council recognises the benefit of play in meeting the developmental needs of children young people and to this end has a dedicated play policy and a Dublin City Play Plan 2012- 2017 devised with the Dublin City Development Board. This LAP will aid towards the realisation of a child friendly city made up of safe, attractive neighbourhoods where children and young people can play, socialise and move from place to place. Both indoor and outdoor facilities including multi-use games areas (MUGAs), teenage shelters, skateboard parks, youth cafes etc will be promoted. New play spaces will be facilitated and encouraged in the plan area, particularly on the key sites, in line with development plan standards i.e. proposed schemes in excess of 75 residential units will be required to provide for accessible play facilities for children and young people.

The standards of the city development plan in relation to social, education and community infrastructure as set out in sections 6.4.7, 17.9.1 (section 'c') and 17.17 of the development plan shall apply. These set various quantum requirements for different scales of development.



#### 4.10.3 Educational Facilities

*The Provision of Schools and the Planning System – A Code of Practice for Planning Authorities, the Department of Education and Science and the Department of the Environment, Heritage and Local Government (2008)*, sets out a methodology for forecasting demand for primary school spaces. With approximately 2,100 new residential units planned, the demand for school spaces may well increase. The possible need for additional spaces will be determined based on the capacity of the existing schools in the wider area.

Verbally the Department of Education and Science has indicated that there are no capacity issues in the area. Furthermore from a desktop study carried out by the planning department it would appear that numbers of pupils in the schools in the plan area and surrounds is falling, indicating increased capacity. In implementing the LAP, DCC will ensure the implementation of, *The Provision of Schools and The Planning System – A Code of Practice for Planning Authorities, 2008*. As required by *The Code of Practice*, the Forward Planning Unit of the DES and local school providers will be consulted.

Schools also have a potentially significant role in providing for play spaces. Greater access to the school grounds after school opening hours could provide a low cost solution to tackling deprivation of play space. In this regard, greater access after school teaching hours, at weekends and during school holidays will be promoted. In addition, in order to promote and facilitate lifelong learning the optimum uses of school buildings in the evenings and during school holidays will be encouraged.



#### 4.10.4 Culture

One of the Six Themes of the city development plan (2011 – 2017) is the Cultural Theme – to value the city's cultural heritage and provide for cultural facilities. The enhancement and promotion of Dublin as a 'City of Character and Culture' and promoting an active artistic and cultural community at both city-wide and neighbourhood levels is central to making areas attractive destinations for tourism and creative industries. A good choice of quality cultural facilities is critical for attracting people to live and work in an area. It is recognised that cultural and tourism facilities act as regeneration drivers for an area, making areas more attractive as a place to live, work and invest in.

The policies of the City Council extend the focus beyond simply the residential unit with an equal emphasis on the surrounding area, defining the essence what makes a good urban neighbourhood. Many factors are involved in fostering a high quality of life, including culture and heritage. Development standards have been set out in the development plan for social facilities, which includes cultural facilities, as well as policies and objectives that aim to support cultural initiatives founded and managed within a community context. Furthermore, the plan recognises that promoting an active artistic and cultural community at city-wide and neighbourhood levels is central to making a vibrant city that is an attractive destination for tourism and the cultural industries and underpin a good quality of life.

Providing for, and supporting cultural initiatives at the local level of the community is a key element in developing a sustainable neighbourhood. To this end policies has been included in the development plan, including the following:

*"To ensure that culture plays a significant role in urban regeneration and reflects the identity of Dublin's neighbourhoods", "to support and promote opportunities for everyone to participate in the city's cultural life by facilitating the provision of effectively-managed, self-sustaining cultural infrastructure suitable for all ages at the neighbourhood level, including regeneration areas, that is accessible to all in the locality", and "to support a sustainable form of cultural provision founded and managed within a community context dedicated to inclusion, innovation and excellence". These policies are underpinned by supporting objectives "to support the implementation of neighbourhood-based cultural plans / initiatives (e.g. the draft Rialto Arts Plan / proposed Community Arts Academy)".*

The importance of culture at the community level is further supported by the city's Cultural Strategy 2009 – 2017, which seeks to ensure that culture plays a significant role in urban regeneration and reflects the identity of Dublin's neighbourhoods.

As detailed in Section 2 of this plan, given the predominately industrial land use of this LAP area, there are no facilities specifically dedicated to culture. Any cultural attributes that do exist within the plan area are those of an architectural and archaeological nature (dealt with in more detail in Section 4.6 – Heritage), such as Drimnagh castle and Bluebell cemetery, have been heavily affected by large-scale industrial structures.



The Naas Road lands plan area, as a developing area, must make good provision for culture and enable easy access to cultural development at the local level by facilitating the provision of quality, multi-purpose cultural spaces and facilities that are accessible by all, both in the existing and in the new communities. The plan will promote active and varied uses of outdoor spaces, including the hosting of cultural events and markets. Artists' live-work units, cultural spaces and public art pieces will also be promoted as part of larger developments.

The major development sites provide opportunities for cultural provision as part of mixed-use schemes having regard to the social infrastructure gap analysis in Section 2.

Sustainable, fit-for-purpose cultural infrastructure that is inclusive of persons at all stages of their lifecycle, including young persons and the elderly will be promoted in the plan area. Such infrastructure could include artists' studios, exhibition spaces, storage spaces, public art and rehearsal spaces. The use of outdoor public spaces for cultural events will be promoted.

As set out in the city development plan, a Cultural Impact Assessment must accompany all major planning applications which assesses the contribution(s) that the proposed development will generate in the cultural life of the Naas Road lands plan area and environs.

The form and detail of any cultural provision shall be the subject of consultation with Dublin City Council's Arts Office at the early stage of design and all proposals for high buildings must make provision for cultural facilities / cultural venues and provide for public art.



### Civic Infrastructure Policies

- SE1.** To encourage the Naas Road KDC to become a focal point for the integrated delivery of accessible and multi-functional social infrastructure and community services
- SE2.** To seek to ensure the provision of a range of environmentally sustainable social infrastructure and social services in the Naas Road KDC that are accessible, cater for all age groups and serve the existing and proposed communities.
- SE3.** To establish new and appropriate landuses that assist in creating relationships between one another and support a growing mixed-use community
- SE4.** To facilitate the provision of educational facilities in the plan area by way of an integrated approach between the Department of Education and Skills (DES), school authorities and the City Council
- SE5.** To seek to foster a new culturally vibrant neighbourhood in the Naas Road lands plan area, linking in with residential areas adjoining, based on a sustainable form of cultural provision founded and managed within the local community
- SE6.** To encourage the development of cafes/restaurants/retail facilities along key routes linking cultural facilities

### Civic Infrastructure Objectives

- SEO1.** To link the plan area, by way of green routes and sharing of social infrastructure, with the surrounding neighbourhoods
- SEO2.** To facilitate improved connectivity to existing schools within and adjoining the plan area through the opening up of new routes, including proposals in site-specific development briefs.
- SEO3.** To promote innovative proposals that create a landmark destination within the city for combined facilities of a recreational, leisure and sports nature
- SEO4.** To encourage vibrancy and activity in this KDA by facilitating temporary / interim and permanent leisure uses whilst also ensuring the protection of residential amenities. Such leisure uses could include a cinema, theatre, indoor sports facilities and gyms, play spaces, skateboard parks, dance studios, roller discos/ice rinks, etc.
- SEO5.** To promote and facilitate the use, including temporary use, of vacant commercial spaces and sites, for a wide range of uses, including cultural uses



## 4.11 Environmental Sustainability and Sustainable Design

### 4.11.1 Introduction

The LAP aims to reduce reliance on unsustainable energy by promoting greener alternatives and ensuring sustainable principles and sustainable design are integral to the regenerative process. Implementing best practice through innovative design will meet the aims contained in the Council documents 'Climate Change Strategy 2008-2013' and 'Towards a Sustainable Dublin'. The plan area is currently characterized by extensive plots conducive to redevelopment and comprehensive implementation of 'green' design and engineering.

This sustainable future approach is promoted in this LAP through four policy approaches below:

1. Promoting a mix of use types in the area, to support the development of sustainable communities.
2. Modern green building and block form design, with high BER ratings, maximising opportunities for both reducing energy consumption, exploiting sustainable energy options and conserving water.
3. Encouraging high levels of use of sustainable modes of transport by promoting walking, cycling and public transport within the LAP area.
4. Promoting and supporting improvements in the public realm which reduce energy consumption, support SuDS, increased carbon sequestering, and support CHP (combined heat and power) district schemes.

By promoting a sustainable diversity of land uses, new development should have an inherently low carbon footprint and the proximity of local, well established amenities should lessen the transport needs in the area. This mix also focuses people's need on using sustainable forms of transport, given their proximity to a well-established network infrastructure.

Within this mixed approach is also the issue of type of housing units provided. New residential units should be designed with flexibility in mind, and taking into account the life patterns of people using them. Sustainable communities should include delivery of a housing mix with inbuilt adaptability to changing circumstances within a family's life-cycle. The inclusion of elements such as community gardens, both public and private open space (such as roof gardens and courtyards) and integrated amenities, would increase the quality of life for residents in the area.

### 4.11.2 Sustainable Design

Sustainable design is promoted in this LAP by focusing on four elements (i) built fabric; (ii) design and layout of buildings; (iii) energy and (iv) carbon impact of construction.

The LAP seeks to achieve development which utilises state of the art energy efficiency policies and best practice technologies to reduce resource consumption and promote environmental sustainability. New developments within the LAP area should, where possible, seek to maximise energy efficiency through their location, design and/or make appropriate use of energy conservation techniques, and go beyond the current minimum building regulations requirements. Building design should maximise natural daylight and ventilation opportunities, incorporate grey water re-use and green roofs and/or walls where possible.

In combination with the materials chosen and physical attributes of building design, sustainability should also inform key urban design elements such as creating attractive micro climates in key public or private spaces, maximising passive solar gain, reducing overshadowing and addressing wind tunnel impacts.

A key part of sustainable building and reduced carbon footprint is the energy consumption of heat, light and power of a building. Opportunities to source these forms of energy from sustainable sources should be exploited. Solar panels, geo thermal and CHP are some of a number of options which provide renewable energy sources, and can also bring economic benefits. CHP on (or near) site production of heating, lighting and cooling has been shown to be very sustainable in terms of efficiency and is most efficient when there is a suitable mix of uses for energy centres. This and other renewable energy system options should be considered for larger sites and also longer term proofing of design to facilitate connection to district scale schemes. In terms of sustained energy demand, the use of compatible uses such as day and night-time loads and cooling and heating – i.e. commercial and residential use respectively, lends itself to the use of energy centres of CHP.

The final area of significant impact is energy and carbon consumed in the built environment arising from construction. The carbon imbedded in buildings, through the materials, processing, delivery and construction impacts is significant. For this reason, existing buildings should, where possible, be re-used and/or refurbished as the first option, with demolition and replacement permitted only where re-use of the existing built form is not practical. New buildings should be designed so that other types of uses can be accommodated in the future ensuring that the building and the carbon invested in it will be fully used and be sustainable in the long term. In compliance with the Dublin City Development Plan, developers are required to provide a sustainability statement to illustrate measures proposed to increase energy efficiency, reduce resource consumption and minimise waste generation.

Whilst this section focuses mainly on building design as one part of the overall sustainability agenda, the LAP does however address environmental sustainability across a range of areas – for example addressing green infrastructure and sustainable transport.

## Environmental Sustainability & Sustainable Design Policies

- ES1.** Promote and support the Naas Road lands area plan as a mixed use area with new development adding new housing, commercial and other uses into the area and to foster a balanced approach to integrating a wide variety of uses on each street and block.
- ES2.** Seek that new developments utilise state of the art energy efficiency techniques and best practice technologies to reduce resource consumption of the earth's resources and promote environmental sustainability.
- ES3.** Through design to enable opportunities within the form, use mix and orientation of the buildings to maximise solar gain and minimise heat loss.
- ES4.** Promote the use of environmentally sustainable technologies and facilities within any development in the LAP area such as the inclusion of CHP (Combined Heat and Power) units on site, community recycling facilities, grey water collection facilities, green roofs and green walls.
- ES5.** Given the prevalence of large sites, seek opportunities within larger block developments to create efficiency in energy consumption both in buildings, blocks and in use of public transport, with future proofing of systems to facilitate district wide schemes in the future.
- ES6.** Building design will give careful consideration to the design and arrangement of buildings on a site in relation to the development of a microclimate. New developments should be future proofed to aid in the conservation of energy and to maximize solar gain and renewable technologies.
- ES7.** All buildings, including housing units, should incorporate flexibility in form and internal design available in the area in terms of size and tenure. Building design and technology used should be flexible and allow for adaptation and for change of use in the long term. A building should not become obsolete on cessation of an activity, but should be capable of facilitating new activities without onerous renovation in order to conserve "embedded energy".
- ES8.** Promote the use of environmentally sustainable materials in the construction of any development in the LAP area.



# Chapter 5 – Key Site Framework Strategies

## 5.1 Introduction

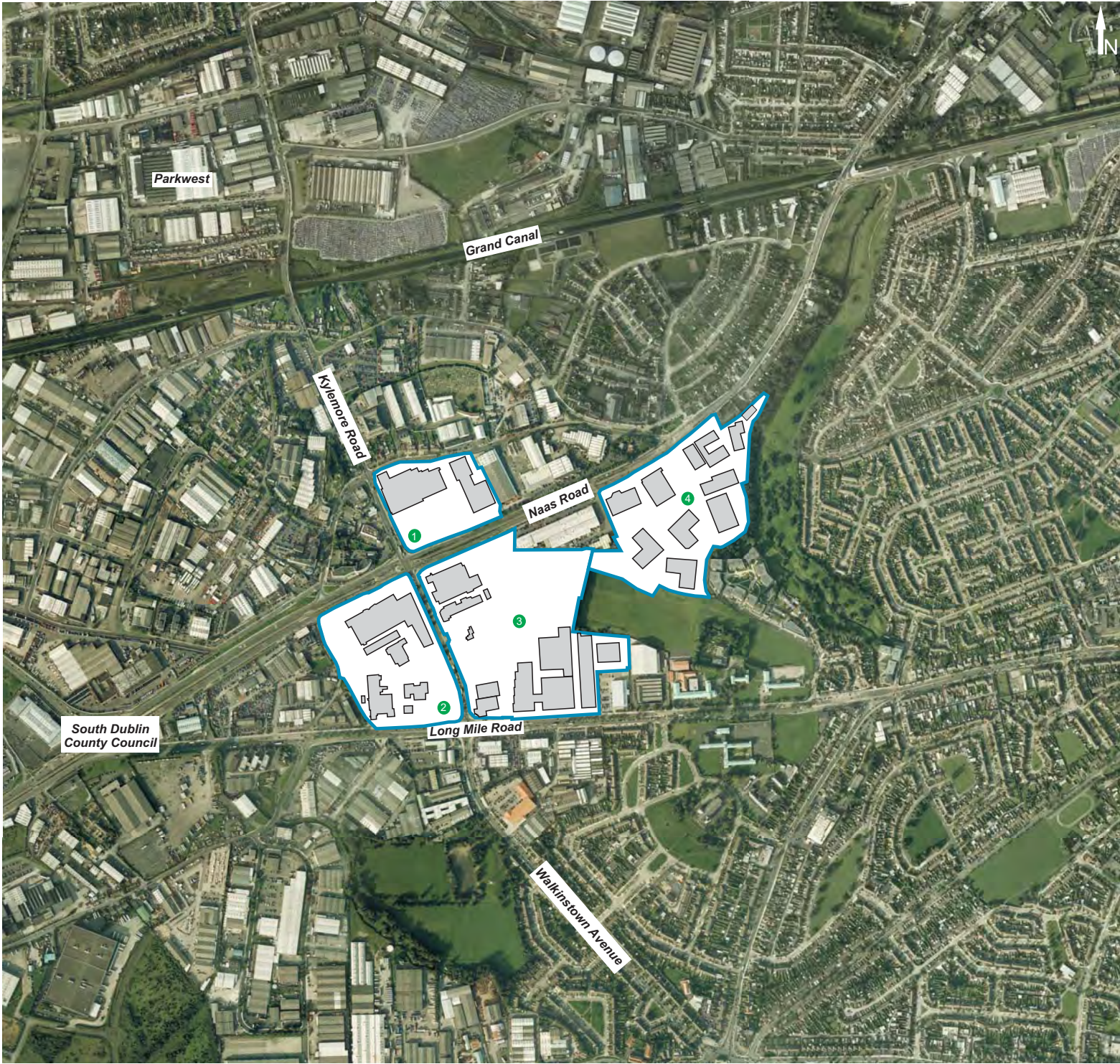
The Naas Road Lands plan area is dominated by large scale underutilised sites which are located along public transport routes leading to the city centre. The area is easily accessible to the city centre, being 6km from the city and adjoining the newly developing Canal Cycle Way along the Grand Canal, providing an attractive segregated cycle route along the old towpath. The area has great potential to provide a sustainable location for new development for the city and the region of Dublin, and due to the scale of the area, will, over a long time period, be able to accommodate a significant level of new development.

In preparing this LAP, four significant site areas were identified which it was considered would benefit from a detailed site focused policy approach due to their scale and importance. This focused approach should ensure full integration of the various strategies and objectives contained in the LAP into the future development of these sites.

For each site a detailed masterplan will also be required at application stage which will be the subject of prior discussion and agreement with Dublin City Council. The commencement of the phased development of these sites will not be considered until the masterplan is in place.

This chapter focuses on four key sites within the LAP area, all of which are critical to ensuring the successful implementation of the LAP. It seeks to focus on the form of future development for each site, the land use mix, connectivity and green infrastructure requirements and also sets out the issues, aims and objectives for each key site. The redevelopment of these key land holdings within the LAP will deliver key policies of Dublin City Development Plan in relation to the core strategy, sustainable development, economic policy, connectivity, retail provision and green infrastructure.

Key Sites



Key Sites:

- |                            |                                                    |
|----------------------------|----------------------------------------------------|
| 1: Royal Liver Retail Park | 3: Nissan Site / Site Fronting onto Long Mile Road |
| 2: Motor Distributors Ltd  | 4: Muirfield Drive / Naas Road                     |



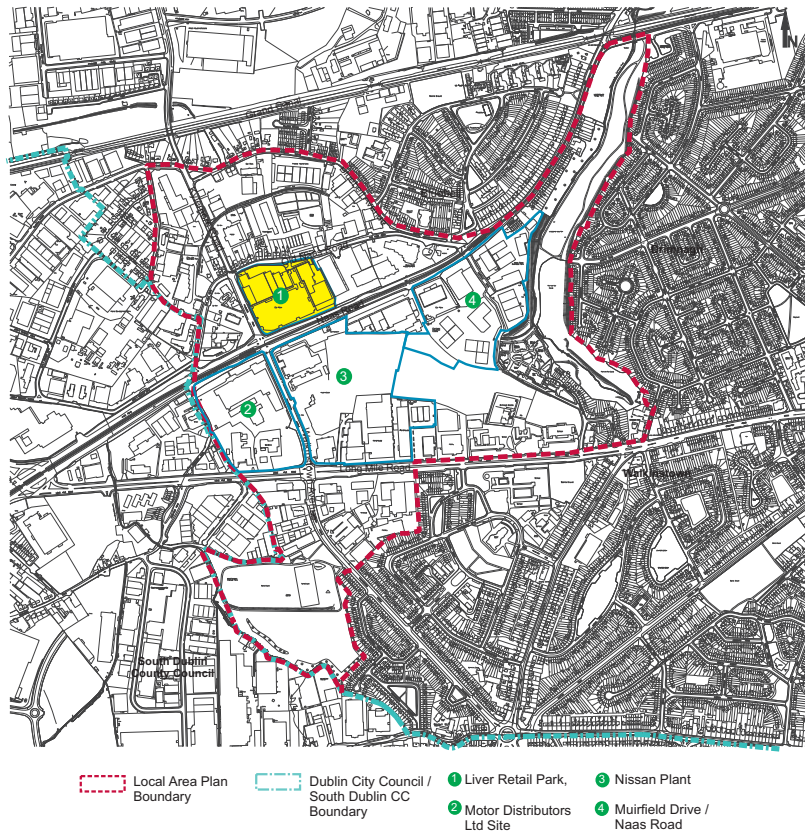
## 5.2 Royal Liver Business Park

### 5.2.1 Context

This site is regular in shape extending for 3.55 Ha and currently occupied by a retail park incorporating 7 no. units in two blocks (11,997 sqm) containing DIY outlets, generally aligned along the northern and eastern boundaries. The shared surface car park contains approximately 550 no. parking spaces, inclusive of spaces dedicated for 'Park & Ride' purposes. The site is accessed at two points from the Old Naas Road on the northern boundary.

The site has frontage of approximately 200 metres along the Naas Road, which is defined by high fencing behind which is a strip of shrub and tree planting. The Kylemore Road frontage runs for some 170 metres approximately, and is similarly defined by high fencing and a narrow strip of planting. The site has frontage of approximately 210 metres on the Old Naas Road, which is defined by a 3 metre high wall, with limited tree planting on the public footpath side of the wall. At present, the site is impermeable save for the aforementioned entrances, and inhospitable to pedestrians and cyclists.

The general area surrounding the site comprises a mix of uses including low intensity uses such as warehouses and also light industrial, some housing to the north and also office type employment and services including motor garages, restaurants and a hotel.



Map 5.1 Key Site - Royal Liver Business Park

The proximity of the area to the city centre and the provision of bus routes and a Luas line has resulted development pressure for intensification with an application in 2008 for a 100,000 sqm mixed use development with a 26 storey tower element. This application was refused by An Bord Pleanála for reasons of overdevelopment, congestion and quality of urban design.

The site is zoned Z14 – 'to seek the social, economic, and physical development and/or rejuvenation of an area with mixed use of which residential and 'Z6' would be the predominant uses'. It is also part of the KDA (key developing area), KDC (key district centre) & strategic development regeneration area (SDRA)

### 5.2.2 Future Land Use

This site will have a significant role in the redevelopment of the area and is suitable for a mix of uses that make more sustainable use of the site.

The land use mix for this site is a mix of enterprise/commercial (including office) uses and residential, with provision of some local services (such as a crèche) and local retail. Local retail and/or local services can be provided within any of the individual commercial blocks, depending on design, accessibility and uses proposed. Due to the high profile location of the site at the junction of the Naas Road and Kylemore Road, the corner will be expected to be shaped by a building (or buildings) of significance and high quality urban design. The height element shall address the corner of the site, and not dominate the entire building. The form of the building(s) in this part of the site, shown as a quadrant in Map 5.2 and Map 5.3, can be reconfigured to reflect the type of uses that will be occupying the building(s), such as subdivision of the quadrant into a smaller blocks, or relocating the courtyard space. Any redesign should ensure that it will deliver a quality urban environment, minimise overshadowing of open spaces and fully and appropriately address the frontage to the Naas Road and junction through high quality architecture and finishes.

This presence can be achieved through the use of height element (up to 10 storeys, 40m) and the design will be required to meet the requirements of the Development Plan for mid and high rise buildings. (See 17.6.3 of the Development Plan).

The land use approach sought will complement those uses proposed on the key sites on the opposite side of the Naas Road (Nissan and Volkswagen site). Together these sites have the development potential to create a significant node at the junction of Naas Road/Kylemore Road and Walkinstown Avenue, marking the location as a gateway to the city.

A Masterplan for the site will be required as part of the first phase of development of this site prepared by the applicants. This masterplan will articulate these objectives through design statements regarding the approach adopted, indicative layouts of future phases, public space provision, green infrastructure and detail of how connections will be achieved. Of equal importance will be the achievement of a good mix of development.

### 5.2.3 Pedestrian/Green Infrastructure Route

The area is presently impenetrable save for a few vehicular accesses. Changing this will require the creation of new routes and strengthening of existing links. This will connect with new public open spaces and the green infrastructure network for the LAP and beyond. The site shall facilitate the movement of pedestrians and cyclists through the site in a direct and easily orientated manner.

### 5.2.4 Pocket Park

A pocket park will be situated at the centre of the development, accessed and framed on three sides by tree-lined boulevards and will act as the central focus of the area and provide an attractive amenity for residents and workers in the surrounding area. The park will provide an attractive setting for the residential blocks adjacent which will frame the space.

The employment/service uses will also provide activity through the day for the park, with an emphasis on active uses to those frontages bordering the park.

### 5.2.5 SuDS

The design brief for the site shall incorporate principles of Sustainable Urban Drainage Systems in accordance with the requirements and standards of the City Councils Environment and Engineering Department.

Sustainable Urban Drainage Systems (SuDS) measures will be required on all sites to be redeveloped. There will be a preference for SuDS features with biodiversity and amenity benefits over inert / hard SuDS features e.g. grass/planted swales, detention basins, infiltration basins, wetlands and storm water trenches in preference to attenuating in tanks, paving sub-base or cellular attenuation systems.

### 5.2.6 Design/Architectural Characteristics

The proposed layout includes perimeter blocks and allows for a strong edge, particularly along the Naas Road which is lacking a regular continuity. Footpaths will be wide enough to ensure safety. The perimeter block style will also allow for the creation of compact and definitive areas of development framing areas of public and private open space.

There will be an emphasis on ensuring the use of quality design and materials, proven for their weathering potential, particularly for the corner element which may be up to 10 storeys in height.



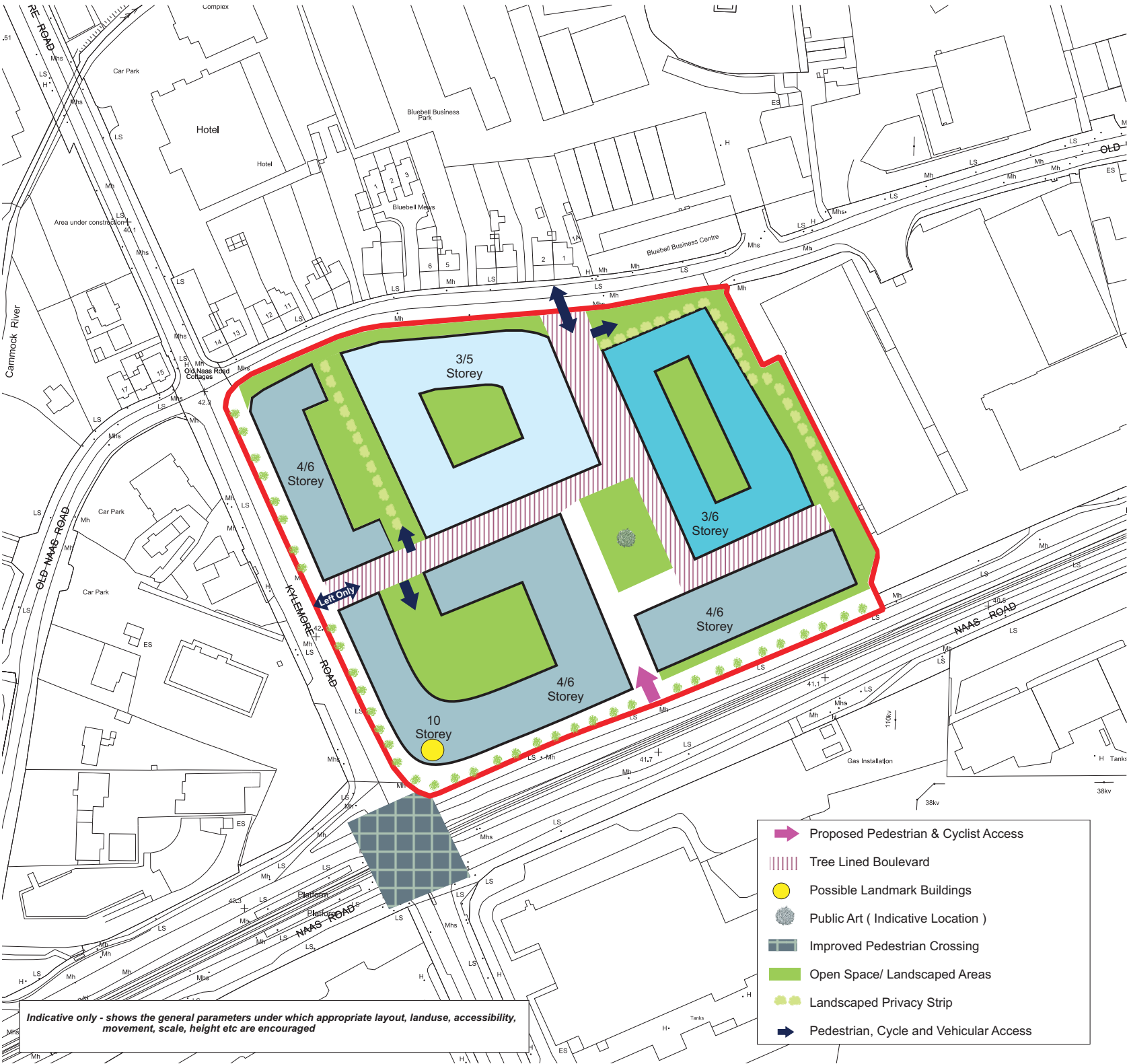
5.2.7 Height

Given it is at the centre of the KDC area and at the Kylemore Road/Naas Road junction, there is an opportunity for development ranging from 3 to 6 storeys throughout the site. Along the northern boundary with the Old Naas Road there would be a range of heights from 3 to 5 storeys reflecting the proximity of residential development to the north. Along the western, southern and eastern boundaries there is opportunity for slightly higher development of up to 6 storeys, given that it is bordering main thoroughfares. Provision is made for a landmark building on the south west corner of the site, for a height up to 10 storeys (40m). ( See Map )

5.2.8 Road Alignment (Setbacks) For Pedestrian, Cycle and Bus Routes

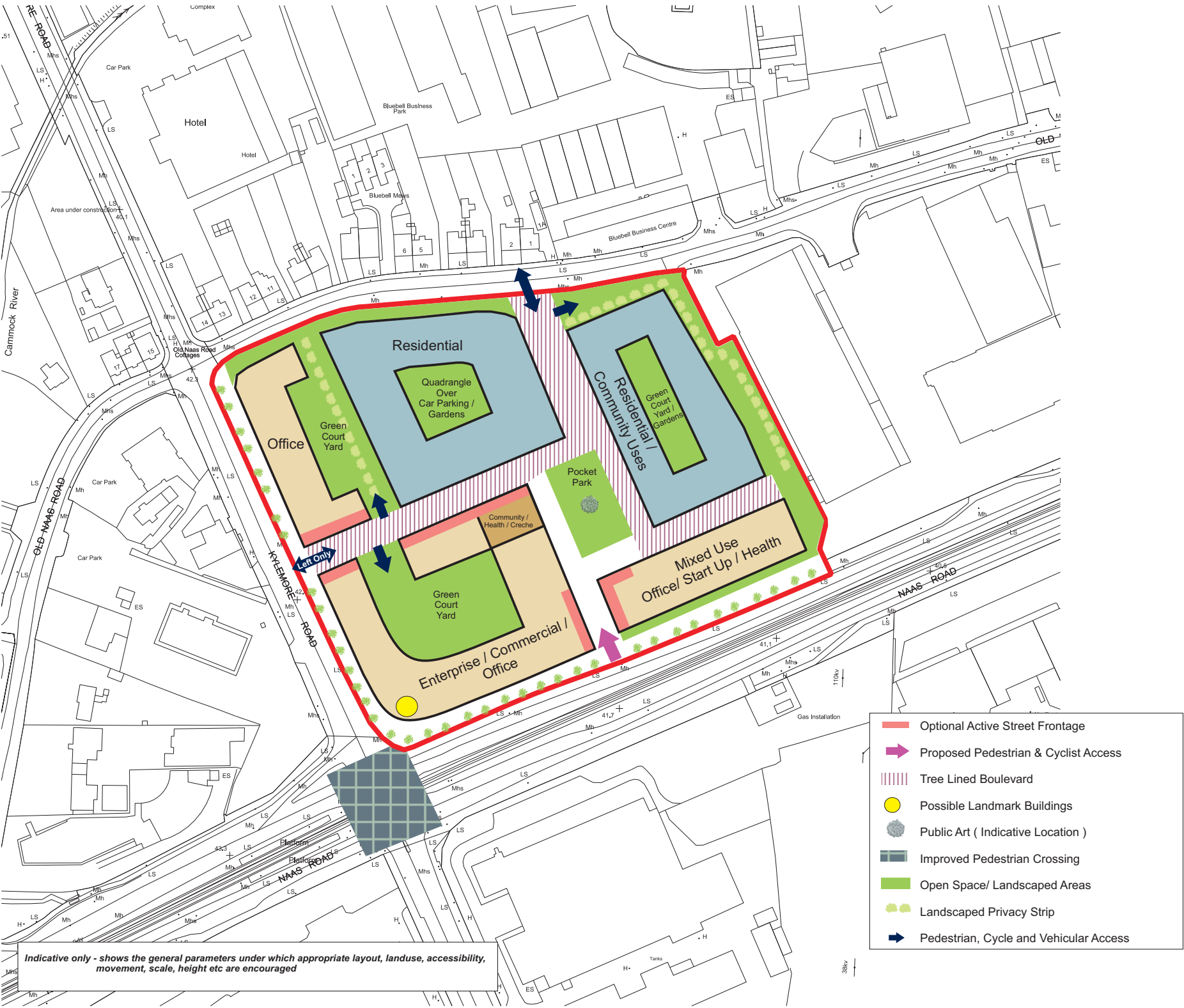
Setbacks shall be required on the Kylemore Road and Naas Road frontages, to accommodate the provision of new cycleways, dedicated bus routes and set-down points, pedestrian footpaths, and green planting strips. These setbacks shall be agreed with the Planning Authority as part of the overall masterplan for the site.

Map 5.2 Proposed Heights - Royal Liver Site





Map 5.3 Proposed Uses - Royal Liver Site



Royal Liver Business Park Objectives

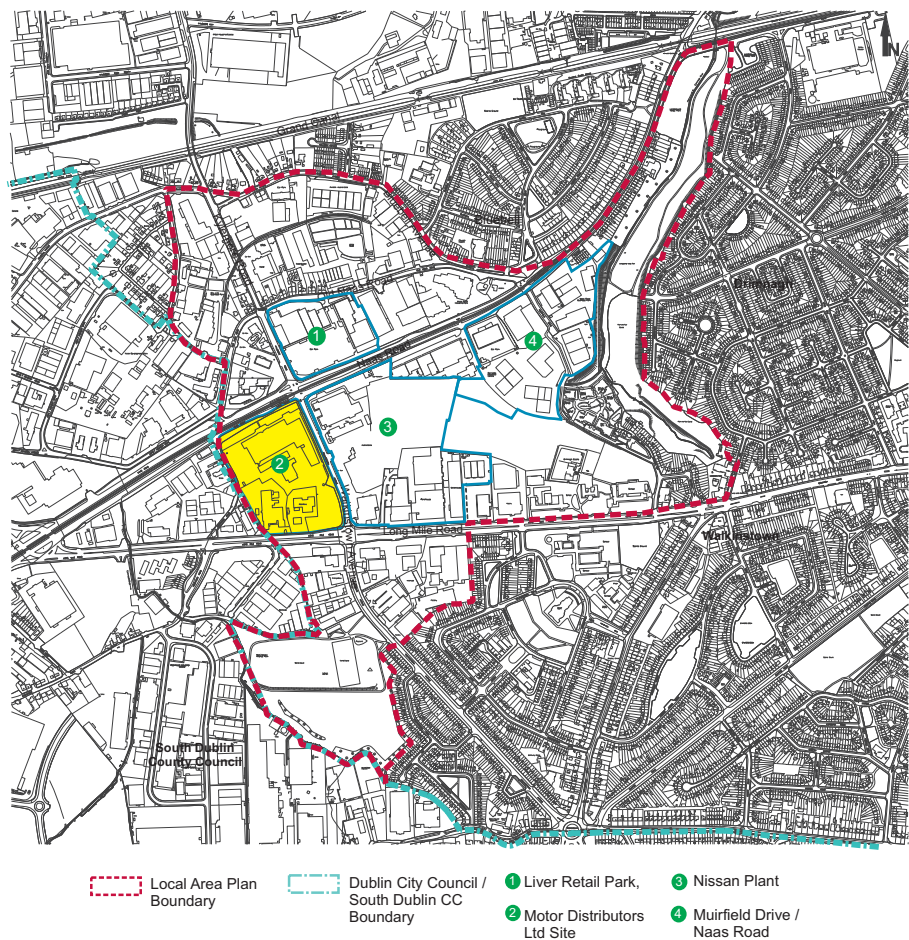
- RLO1.** To encourage the sustainable redevelopment of this key site as part of the mixed-use core of the Key District Centre containing mainly office and residential uses with local scale retail and service uses.
- RLO2.** To provide for a boulevard leading to a pocket park and pedestrian and cycling connections through the site to increase connectivity and deliver the green infrastructure network of the LAP.
- RLO3.** To provide for a sustainable approach to height within the site, with buildings addressing the Naas Road and Kylemore Road providing a strong building line with appropriate heights, marked at the corner with a landmark building of up to 10 storeys. Within the site heights will be at sustainable level, appropriate to the uses proposed.
- RLO4.** Require setbacks to be agreed with Dublin City Council along the main road frontages at Naas Road, along the east side of Kylemore Road to facilitate upgrading of the road to provide for a bus lane, segregated cycleway, greening of the route and footpaths allowing for an attractive and vibrant street environment and to encourage pedestrian and cyclist activity.
- RLO5.** To pilot new green infrastructure installations in the public realm to boost biodiversity and improve surface water management.
- RLO6.** Materials used for construction shall have provenance for their durability and weathering qualities and prior examples of their use shall be furnished to the Planning Authority at Masterplan stage. This is of particular relevance to the landmark building.
- RLO7.** In consultation with the HSA, ensure that any new development proposal is compliance with the requirements of Seveso regulations.
- RLO8.** To ensure that all applications address the following issues regarding water management:
- a. Prepare a site specific flood risk assessment of the site as part of the first application;
  - b. Fully incorporate SuDS in the design of the overall scheme and accompanying masterplan;
  - c. Put in place measures to protect water quality, addressing particularly the issue of discharges and runoff; and
  - d. Manage water usage within the site to conserve consumption of treated water and make use of grey water and/or rainwater where suitable.



### 5.3 Motor Distributors Limited Site

#### 5.3.1 Introduction

The Motor Distributors site is located along the western boundary of the LAP area directly adjoining the administrative area of South Dublin County Council. While physically subdivided, the site appears to be in single-ownership. It is a vast, largely rectangular, 6.5-hectare site occupying almost one entire land block and is wholly enclosed by the Naas Road, Long Mile Road, Walkinstown Avenue and Robin Hood Road with extensive frontage onto all four roads (210m x 190m x 320m x 270m). Robinhood Road is a minor roadway, accessed directly by vehicles off the Naas Road and terminating in a cul-de-sac, while allowing pedestrians and cyclists through access.



Map 5.4 Key Site - Motors Distributors Ltd

The site is directly adjacent to the 'Kylemore Luas' stop on the Naas Road and 'Dublin Bus' stops along the Naas and Long Mile Roads and Walkinstown Avenue. Pedestrian and vehicular accesses to the site are off Walkinstown Avenue, Longmile Road and Robin Hood Road with the principal entrances off Walkinstown Avenue and Long Mile Road. Some accesses have been gated, are locked and not in current use. Permeability

through the land block is currently non-existent. The existing uses on the site are low-intensity. The majority of the site is occupied by Mercedes Motor Distributors, trading in the importation and distribution of commercial motor vehicles currently, and accommodates a number of single-storey buildings, including a Protected Structure, offices, vehicle display areas and training facilities. The majority of the site is used for hardstanding for the storage of commercial vehicles. A smaller portion of this key site, serviced off Long Mile Road, accommodates a sofa retail outlet and car parking. This is a low grade frontage with a 'big box' type structure set back from the footpath edge forming a weak and poorly defined urban space.

The brick building to the front / north of the site is protected – described in the Record of Protected Structures as 'Volkswagen Premises, front range of buildings only'<sup>1</sup>. A prominent feature in the wider area is the digital clock tower on top of this building, standing at a height of 20 metres from ground level.



The Mercedes Benz signature rotating insignia, set on top of the tower, is a later addition and adds another approximately 5 metres height. The building has been described as "a fine example of an early (1950's industrialisation) factory. This little known handsome brick building merits further research ... arguably the finest building on the Naas Road today".<sup>2</sup> This northern site frontage is heavily planted allowing for only brief, interspersed views of the protected structure from the Naas Road.

The core of the plan area is not close to any major green spaces. The closest area of amenity to this key site is Walkinstown park, an urban park of amenity grassland and tree planting hosting a range of sports and recreational activities.

1 Protected Structure Ref 5792 - Record of Protected Structures 2011 - 2017  
2 20<sup>th</sup> Century Architecture Survey, Dublin City Council and The Heritage Council, 2012

#### 5.3.2 Future Direction

This key site has a significant role to play in the rejuvenation of the area and is considered to be suitable for mixed-use redevelopment and intensification having regard to development plan designations, its strategic location, proximity to public transport and national road routes, large size and the current low intensity development on the site. The site is also in single ownership.

##### 5.3.2.1 Plot Ratio and Site Coverage

Indicative plot ratio and site coverage for Z14 sites are set out in the city development plan at 1.0 – 3.0 and 50% respectively.

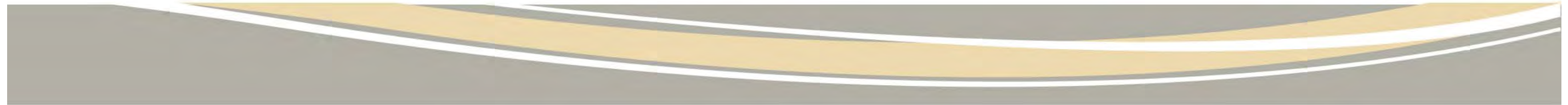
##### 5.3.2.2 Landuse

A rich array of land uses will be promoted on the site in order to support the plan area's designation as a KDC, KDA and SDRA and the local area plan's strategic objective to create a growing, mixed use community in and around the area. Landuses will be encouraged that interact positively with those uses proposed on the key sites on the opposite side of Walkinstown Avenue (i.e. Nissan site) and those key sites fronting onto the Naas Road. Together these sites have the development potential to create a significant node at the junction of Naas Road, Walkinstown Avenue and Kylemore Road, marking the location as a gateway to the city.

Uses on site will include retail, commercial/office & enterprise, residential, community, health and associated uses. Active uses will be required at ground floor fronting onto public spaces and along key routes in order to enliven these streets and contribute to a greater perception of safety. The building blocks should be so arranged to exploit the benefits of solar gain from the southern aspect of the site.

In order to enliven the key arteries and create a sense of community and economic activity in the wider area it is appropriate that retail outlets and other active uses, are encouraged at ground floor level along Walkinstown Avenue and Long Mile Road. Such uses could include larger retail forms such as convenience retail, showrooms for furniture etc and leisure/recreational uses. The upper levels of these buildings are suitable for commercial/office, including enterprise uses. Commercial uses could be facilitated at ground floor level provided a dead frontage is avoided. Retail provision of between 10,000 to 12,000 sq.m of net retail floor space (at both ground and first floor levels) is provided for this site, to address both short and medium term retail need.





That part of the site closest to Robinhood Road, and set back from Long Mile Road, would ideally suit residential use in order to take advantage of higher privacy and lower noise levels from vehicular traffic and benefit from the proposed new public spaces and green links. Residential uses should be designed and constructed in such a way as to minimise noise disturbances (for example bedrooms located to the rear of the units away from the main roads, and sound proofing of all windows on those façades most exposed to noise from traffic). Commercial/enterprise uses would be suitable close to the protected structure, building on the role of the Naas Road as an economic corridor. A crèche facility could be provided here also, close to the proposed pocket park.

The development of the office structure to the rear of the protected structure will need to be carefully designed to avoid detracting from the building. The height and form of the new development close to the protected structure will need to demonstrate that the height(s) used across the building and form of the development respect and complement the horizontal form of this attractive feature of this key site. The heights indicated of 4/5 storey for this building are relevant only to the southern elevation, and may not be suitable or appropriate for the entire extent of the building, particularly at its interface with the protected structure

The protected building is currently in commercial / office use. Other uses will be considered provided they are compatible with, and protect, the character of the structure. This prominent building, with the clock tower, and its location at the entry point to the plan areas at the city boundary is advantageous and can mark a formal entry point into the city. Its setting and overall visibility will be improved in order to enhance its character and add to the creation of a sense of place and history in the plan area.

### 5.3.2.3 Social / Community Facilities

Traversing the centre of the site in an east-west direction, a new boulevard of at least 20 metres in width is proposed with high quality retail alongside community and café/restaurant uses fronting onto it. The boulevard will form the nexus of north-south and east-west pedestrian, cyclist and vehicular routes through the site. Whilst allowing vehicular movement along it, the boulevard shall be so designed to ensure that ease and safety of pedestrian movement is prioritised. Active frontages will be required here. It is desirable that the retail here be of the 'daily shopping' form with a fine grain. This could encompass convenience, speciality and retail services such as chemist, florist, news agency, hairdresser etc. The boulevard will continue eastwards into the key site (Nissan) on the opposite side of Walkinstown Avenue.

Development on this site will include proposals for social and community infrastructure and public art. This key site is ideally placed to accommodate a new community centre capable of serving the future population as well as the existing residential populations, particularly those in Walkinstown and Drimnagh. The facility should be provided at the centre of the development fronting onto the boulevard, in close proximity to existing and proposed residential development to ensure maximum usage. The space should be multi-purpose, suitable for all ages and accessible in terms of physical design, location, cost of use and opening hours.

A relatively sizeable pocket park will also be provided for at the core of the site, bounded by the boulevard to the north and residential and mixed uses on remaining boundaries. This space will be capable of hosting community-scale outdoor performances.

### 5.3.2.4 Utilities

There is a large trunk 750mm watermain which runs diagonally through a number of the large development sites. There is a connection off this watermain where it crosses the Long Mile Road and the area is generally fed from this connection via a network of smaller pipes. Given the circumstances of this watermain and the fact that it passes through a number of large potential development sites, consideration will be given to the possibility of diverting it. Such a diversion shall be at the expense of the developer(s). New development and/or works and landscaping will need to demonstrate that the existing network and associated wayleaves are protected from impacts which could put the network at risk of damage. Developers shall protect the existing infrastructure on site, which includes all main water/drainage pipes, and any other overhead/underground services.

### 5.3.2.5 Setbacks

New buildings will be required to be set back from the boundaries of the site to allow for a bus lane and bus set down/interchange point along Walkinstown Avenue and generous space for pedestrians, cyclists and additional tree lines. In the redevelopment of this key site, setbacks should be introduced along Walkinstown Avenue and Long Mile Road to allow for more generous footpaths, additional tree lines and off-road cycle lanes. Where space and gradients allow, swales are to be incorporated to hold and filter stormwater.

Along with these desirable setbacks, the maintenance and improvement of existing greening initiatives along the major thoroughfares surrounding the site is also to be promoted i.e. along Naas Road, Long Mile Road, Robin Hood Road and Walkinstown Avenue. The visual amenity and microclimate of these thoroughfares could be enhanced with a cohesive scheme of semi-mature tree planting.



***Indicative urban form proposed along Walkinstown Avenue and Long Mile Road***  
"Copyright Norton UDP. Images not to be reproduced without permission"

There is significant greenery existing along the Naas Road frontage of the site and also some street trees along Walkinstown Avenue. Where this greenery exists it should be retained where feasible and enhanced for the benefits of amenity and local biodiversity.

Any new buildings close to the protected structure should be set back significantly from the northern boundary of the site so as to enhance the character and setting of the protected structure.

To protect the amenity of future residents in the residential area closest to the retail building, a protective screen wall, with a high quality landscaping strip facing the residents will be required between the retail building and the residential area. This landscaped screen will frame a pedestrian connection from the pocket park to the Long Mile Road and also any vehicular access for the housing units on the eastern elevation.



5.3.2.6 Height

The protected structure to the front/northern section of the site will influence the height of new build in this section of the overall site. A maximum of 4 storeys is recommended adjacent to the protected structure. Around the perimeter of the site, generally a height of between 4 to 6 metres is considered acceptable facing onto the main roads i.e. Walkinstown Avenue and Long Mile Road. It is considered that a taller landmark structure of up to 8 storeys can be accommodated on the corner of Walkinstown Avenue and Long Mile Road. A building height of no more than 4 storeys is appropriate along Robinhood Road as this road is significantly narrower and a cavernous effect should be avoided. Internally on site, facing onto the main boulevard, a maximum of 4-5 storeys is desirable

5.3.2.7 Permeability

As individual sites are redeveloped, opportunities will present themselves to provide additional green linkages to green spaces and to dramatically improve permeability for pedestrians and cyclists throughout the area. While this key site is currently disconnected from the area around it, it is strategically placed to dramatically improve pedestrian permeability by integrating the site into the wider area and linking the site into a permeable pedestrian network. This can be achieved by the creation of boulevard / green link traversing the site in an east – west direction and linking into an improved pedestrian crossing eastwards over Walkinstown Avenue and linking in with the boulevard to be incorporated into the Nissan site to the east.

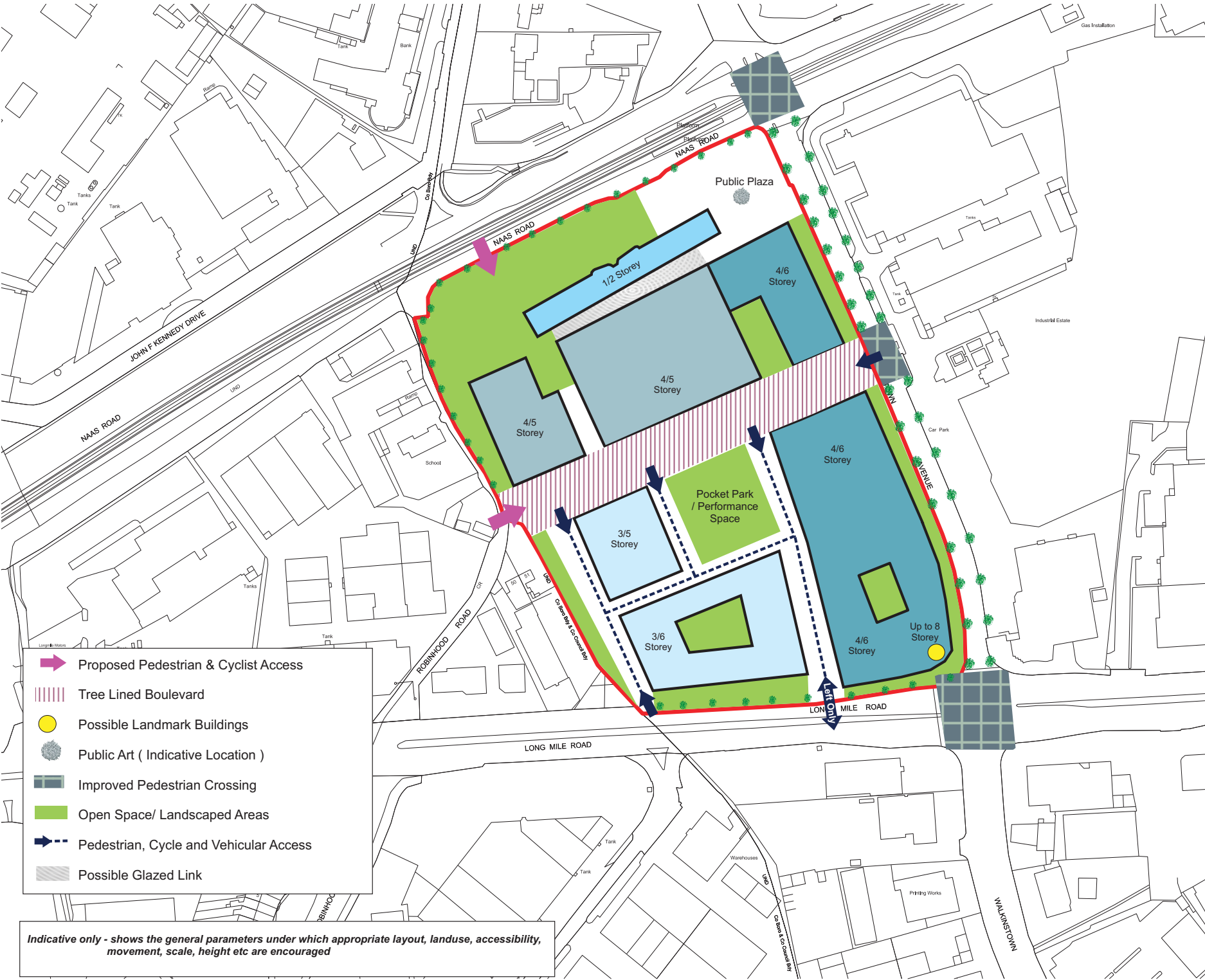
Pedestrian movement through the key site will be further enhanced by the creation of north-south priority pedestrian routes running from the south of the site from Long Mile Road northwards to the Naas Road. This route will allow for easier access to the school along Robinhood Road and Luas and bus stops along the Naas Road. Pedestrian access will be incorporated into the northern boundary of the site.

5.3.2.8 SuDS

The design brief for the site shall incorporate principles of Sustainable Urban Drainage Systems in accordance with the requirements and standards of the City Councils Environment and Engineering Department.

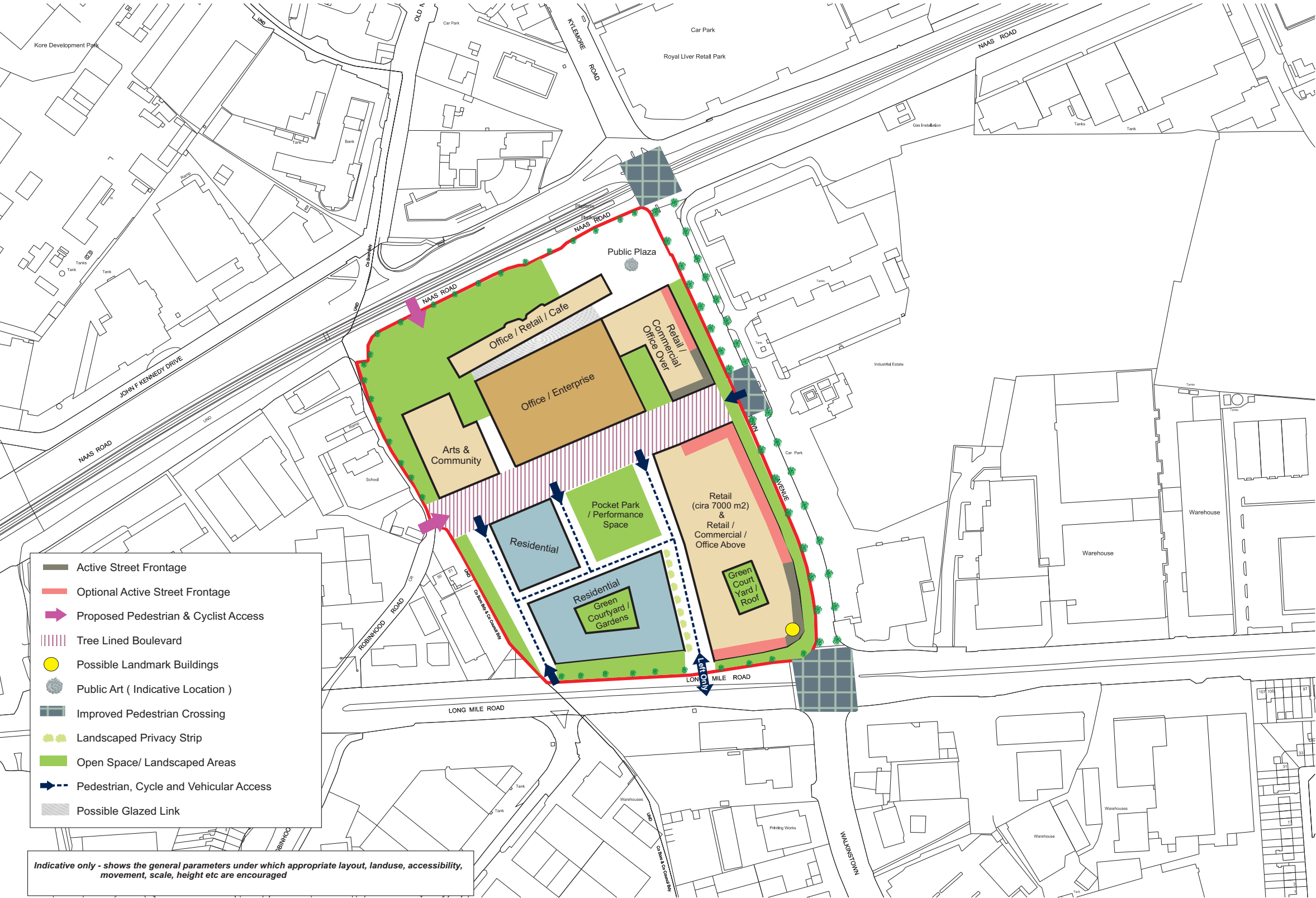
Sustainable Urban Drainage Systems (SuDS) measures will be required on all sites to be redeveloped. There will be a preference for SuDS features with biodiversity and amenity benefits over inert / hard SuDS features e.g. grass/planted swales, detention basins, infiltration basins, wetlands and storm water trenches in preference to attenuating in tanks, paving sub-base or cellular attenuation systems.

Map 5.5 Proposed Building Height - Motor Distributors Site





Map 5.6 Proposed Uses - Motor Distributors Site





### Motor Distributors Ltd Site Objectives

**MDO1.** 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 District Centre 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.

**MDO2.** Require a general height of between 4 and 6 storeys fronting onto Walkinstown Avenue and Longmile Road, a landmark building of up to 10 storeys at the junction of Walkinstown Avenue and Long Mile Road, 3 to 5 storeys within the core of the site and 5 storeys adjacent to Robinhood Road. The height of new development along Naas Road, directly adjacent to the protected structure, should protect the special character of the protected structure and should be no more than 4 storeys in height.

**MDO3.** Require setbacks along the west side of Walkinstown Avenue and north side of Long Mile Road to facilitate widening of the road to provide for a bus lane, segregated cycleway and footpath allowing for an attractive and vibrant street environment and to encourage pedestrian and cyclist activity.

**MDO4.** Facilitate landuses that introduce active frontages and enliven the streets along Walkinstown Avenue, Long Mile Road and along priority pedestrian routes running through the site. Such uses may include local services such as retail, cafes, restaurants, leisure, cultural and community uses, reception areas to commercial areas above and other complementary active uses. Design of all units at street level should have a strong urban edge, convey openness and contribute to vibrancy in the public realm.

**MDO5.** Require the provision of a flexible and publicly accessible facility for community and cultural uses. Dublin City Council will, in consultation with local stakeholders, identify suitable uses for the facility. The form, size and other details of this space shall be designed in consultation with Dublin City Council and will become part of the resources of Dublin City Council to support community and cultural activities in the city.

**MDO6.** Require the provision of a pocket park/performance space.

**MDO7.** Retain the Volkswagen premises (protected structure ref. 5792) as a landmark and formal entry point to the city and ensure the enhancement and protection of the special interest and character of the structure in any refurbishment, adaption or reuse; regard to be had to Dublin City Council's upcoming guidelines on protection and refurbishment of buildings of the late twentieth century once published.

**MDO8.** Improve views of the Volkswagen Premises (protected structure ref. 5792) from the Naas Road by incorporating a strategically placed pedestrian access point into the northern boundary treatment of the site, incorporating a redesign of landscaping and an appropriate lighting scheme. This pedestrian point should allow for easy access to nearby bus stops and the Kylemore Luas stop.

**MDO9.** Provide for a predominantly pedestrian and cyclist-orientated environment at street level. The majority of car parking shall be provided at basement or at under-croft levels provided such under-croft parking does not undermine the objective to provide for active street frontages. A limited amount of well-designed car parking shall be facilitated at surface level subject to good design, integration with the street and broken up with landscaping and/or street furniture.

**MDO10.** Provide for a clearly defined arrangement of public spaces which integrate into the emerging pedestrian / green routes and cycle network for the plan area and beyond and that increases permeability throughout the site by incorporating clearly defined east-west and north-south pedestrian and cyclist-friendly routes through the site framed by buildings on both sides and containing active street level uses along these pedestrian routes allowing for passive supervision.

**MDO11.** Provide for a boulevard traversing the core of the site in an east-west direction integrating with the boulevard to be provided on that key site to the east of Walkinstown Avenue (the Nissan site). This space shall accommodate pedestrian, cyclist and vehicular movement but will be so designed so as to prioritise pedestrian and cyclist movement. This boulevard shall incorporate street art, furniture and planting, SuDS and shall be an attractive space for relaxation. The boulevard shall be overlooked by residential units on some upper levels and fine grain neighbourhood-level retail units, cafes, cultural uses and other complementary uses at ground floor levels.

**MDO12.** Assist in promoting modal shift to sustainable modes of transport by enhancing connections between the site and the Kylemore Luas and Dublin Bus stops by reserving road space for a setdown for buses on Walkinstown Avenue, by incorporating new pedestrian access points in boundaries of the site and provide for enhanced pedestrian crossings over the Naas Road, Walkinstown Avenue and Long Mile Road.

**MDO13.** As part of the redevelopment of this site the 750mm watermain may need to be diverted. Such a diversion would be at the expense of the developer(s).

**MDO14.** To ensure that all applications address the following issues regarding water management:

- Prepare a site specific flood risk assessment of the site as part of the first application;
- Fully incorporate SuDS in the design of the overall scheme and accompanying masterplan;
- Put in place measures to protect water quality, addressing particularly the issue of discharges and runoff; and
- Manage water usage within the site to conserve consumption of treated water and make use of grey water and/or rainwater where suitable.

**MDO15.** To retain existing mature trees and planting on this key site, in particular those trees along the site's northern boundary and that tree line located in the southern section of the site, where feasible and appropriate.

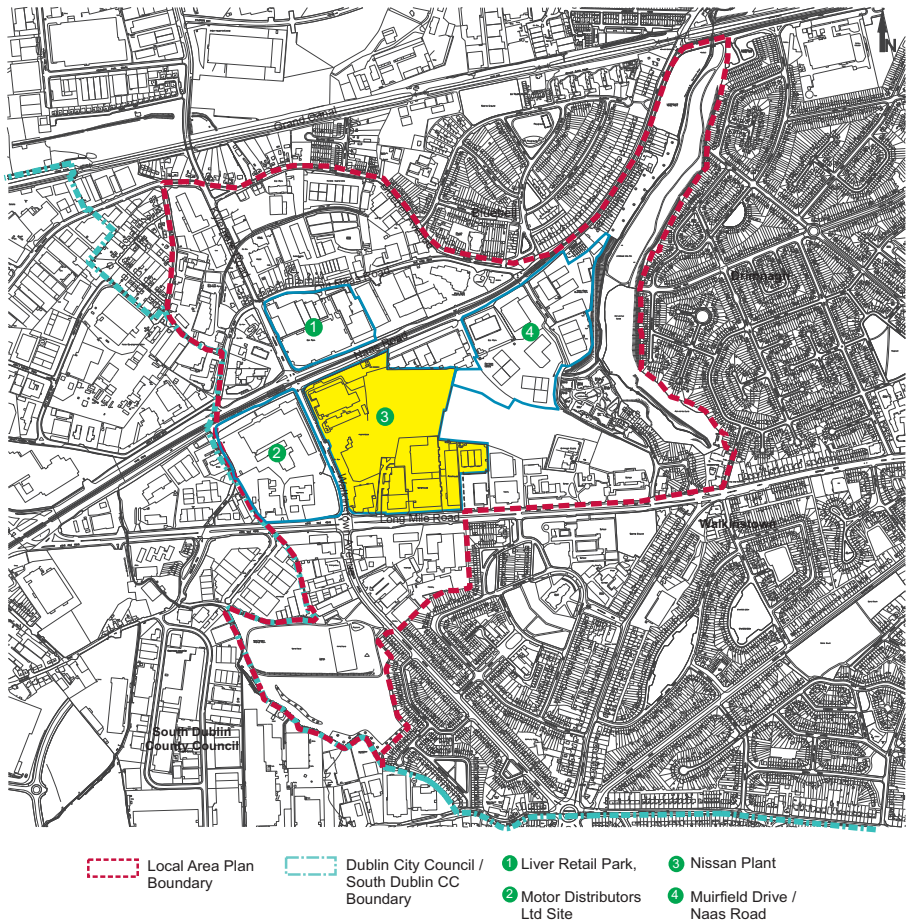


## 5.4 Former Nissan Plant & Site fronting Long Mile Road

### 5.4.1 Context

This large irregular shaped key site measures approximately 12 hectares and is located in the heart of the new key district centre at two important crossroads (Longmile Road/Walkinstown Avenue, and Naas Road/Kylemore Road). The site is located to the west of the Motor Distributors Site, and to the south of the Royal Liver Site which are also identified as key sites. The site is approximately 6km west of Dublin city centre, and well serviced by public transport.

Map 5.7 Key Site - Nissan Plant / Site Fronting onto Long Mile Road



Whilst most of the site (which includes the former Nissan Site) is currently underutilised, there are still some active mixed uses fronting onto the Long Mile Road to the south east of the site which are in separate ownerships. The site has three road frontages, the Naas Road and Longmile Road and Walkinstown Avenue. The main access into the former Nissan site is from Walkinstown Avenue and there are also a number of access points from the Long Mile Road, serving the individual premises. There are three detached industrial premises on the former Nissan site, which comprise of showroom, office and warehouse accommodation.

The shared surface car park to the rear of the Nissan site contains approximately 1500 - 2000 parking spaces and occupies approximately three quarters of the overall site. The site is impacted by two major infrastructure networks- a 750mm watermain which runs diagonally through the site as well as two overhead electric cables- a 110kV and a 38KV line and associated pylons.

The immediate environs of the site is predominantly industrial except along the eastern boundary where there is a common boundary with playing fields belonging to the school and Drimnagh Castle.

The general surrounding area comprises a mix of uses including low intensity uses such as warehouses and also light industrial and office type employment and services including motor garages, restaurants, showrooms and some retail uses.

### 5.4.2 Future Direction

Given the plan area's designation as a KDA, KDC and an SDRA, a key objective of the LAP is to facilitate the area to act as a strong spatial hub, to provide a significant quantum of development and a rich mix of uses, to aid in the delivery of the residential and employment needs of the city and to provide a comprehensive range of community and cultural services and facilities for the plan area and its surrounding suburban communities. This key site has a significant role to play in the rejuvenation of the area and is considered to be suitable for mixed-use redevelopment and intensification having regard to its strategic location, proximity to public transport and national road routes, large size and the current low intensity development on the site.

In the redevelopment of this large key site, applicants for permission shall be required to produce a detailed site master plan accompanied by a clearly articulated design statement which will address all the key issues such as building height, uses, quantum of floorspace, accessibility, public realm, SuDS, infrastructure, and Green Infrastructure. (See also Chapter 6).

### 5.4.3 Landuse

The site is zoned Z14 in the Dublin City Development Plan 2011 – 2017 'to seek the social, economic and physical development and /or rejuvenation of an area with mixed use, of which residential and 'Z6' would be the predominant uses'.

A mix of land uses in accordance with the zoning for the site will be promoted to achieve mixed use community and employment opportunities and a range of local services in and around the area. Landuses will be encouraged that interact positively with those uses proposed on the key sites on the opposite side of Walkinstown Avenue and the Long Mile Road (i.e. Motor Distributors site) and those key sites fronting onto the Naas Road. Together these sites have the development potential to create a significant enterprise and employment node at the junction of Naas Road, Walkinstown Avenue and Kylemore Road, marking the location as a gateway to the city.

Uses on site will include retail, commercial/office & enterprise, residential, community uses, leisure and associated uses. Active finer grain uses (such as restaurants, local shops, small scale retail units etc) will be encouraged at ground floor fronting onto public space/boulevards, and along key routes in order to enliven these streets and contribute to a greater level of safety.

The distribution of land uses across the site reflect the need to achieve a coherence to the new KDC, provide attractive locations for new residential, and to provide economic uses that integrate with the Naas Road Economic Corridor. It is proposed that commercial and economic activity addresses the key route corridors serving the area- the Naas Road and the Long Mile Road- providing high quality modern buildings and enterprise space that fully addresses these large roads, and benefits from the public transport services. The retail and associated uses are focused along Walkinstown Avenue, with a node proposed mid-way along the avenue, where a new boulevard serving the site meets the road and where the employment activities, retail and café/restaurant and other services can interact. The aim is to achieve a pedestrian friendly hub of activity along the boulevard which provides strong connectivity through the site, and focussing retail options within walking distance of each other and of both bus and Luas services. The eastern part of the site, close to schools and to the park will be more residential in character; providing a mixed typology of housing and apartments/duplex. This area will be an attractive residential community, well served by local community services, retail and public transport. The design of all development within the site should be so arranged to exploit the benefits of solar gain from the southern aspect of the site.

### 5.4.4 Retail

The LAP seeks to address the need for increased convenience and local comparison retail within this part of the city by encouraging the provision of a large convenience retail facility within this site, while also seeking to promote competition within the KDC and facilitating other convenience stores within the KDC core area. A large area within this site is earmarked for retail, providing the opportunity for the development of a high quality retail, services and leisure uses hub at ground (and upper) floors. It is anticipated that the total volume of retail on this site provided over the short and medium term would be in the order of 10-15,000 sq. m, (net floor area) plus limited additional floor space for local services such as community offices, post offices and health facilities. In achieving a quality urban environment the design of this retail area must deliver key urban design objectives. These include strong urban edges to the public road with active road frontage; attractive finishes and landmark design addressing the corner of the Long Mile and Walkinstown Avenue junction; avoidance of single storey uses with height provided to frame the roads, give presence and ensure sustainable use of land; provision of parking and service deliveries at undercroft or underground levels; use of upper floors for either commercial, retail, local services, employment or (subject to design) residential uses ; and to achieve a vibrant mixed use development. The Design Guide published to accompany the Retail Planning Guidelines, April 2012, issued the Department of Environment, Heritage & Local Government provides key design principles for retail development, and any application should have regard to these.





This area of development does not require to be built as one single block, but can form a series of phases/related blocks to allow the KDC develop over time. The detail of how future phases would be accommodated will be required to be shown in the first application as part of the masterplan for the site.

#### **5.4.5 Public Spaces**

All public spaces shall be designed so that they are high quality, attractive and robust and can easily be navigated. All proposals shall demonstrate how they connect to the surrounding streets and spaces. The planning of new public routes/boulevards should promote permeability and walkability, promote biodiversity and provide passive surveillance to discourage anti social behaviour. Buildings should properly address public streets and spaces, and active frontages should be used where possible, avoiding the use of blank walls onto the public realm. Building frontages should also provide appropriate enclosures to streets.

#### **5.4.6 Height**

Around the perimeter of the site fronting onto the Naas Road, Long Mile Road and Walkinstown Road, generally a height of between 5 to 6 storeys is considered acceptable, whilst for buildings fronting onto the new boulevards a height of between 4-6 would be desirable. For the residential blocks to the east of the site a height of between 3-5 storeys is desirable. Two landmark buildings will be considered on this site with heights of up to 10 storeys. See Map 5.8

#### **5.4.7 Permeability**

As individual sites are redeveloped, opportunities will present themselves to provide additional green linkages to green spaces and to dramatically improve permeability for pedestrians and cyclists throughout the area. There are a number of opportunities on this site to dramatically improve pedestrian permeability by integrating the site into the wider area and linking the site into a permeable pedestrian network. This can be achieved by the creation of boulevard / green links traversing the site in an east – west and also north-south direction linking into an improved pedestrian crossing on Walkinstown Avenue, which crosses into the Motor Distributors site to the west. Also achievable are linkages exist to the east of the site to the school grounds into Drimnagh. Pedestrian movement through the key site will be further enhanced by the creation of north-south priority pedestrian routes running from the south of the site from Long Mile Road northwards to the Naas Road. This will provide improved access to public transport.

#### **5.4.8 Landmark Buildings**

In terms of the two landmark buildings on the site, the role of these buildings is to act as marker buildings into the city from the west. Design proposals for the landmark buildings shall be of a high quality with the design approach taken detailed in any planning application. The geometry of the building should be carefully considered to strike a balance between its urban design role and its internal function and building materials should be appropriate to the scale and importance of the building. Frequent changes in material should be avoided.

#### **5.4.9 Landscaping/Ecology**

For large sites applicants should consult with Dublin City Council's Parks and Landscape Division to ascertain the significance of any ecologically sensitive areas. Landscape design and infrastructure proposals shall form part of the masterplan for each site.

#### **5.4.10 Sustainability**

All building design and layout should take account of solar gain and microclimatic impacts, and all proposals shall include sustainable waste management and water conservation measures and connectivity to the green networks.

#### **5.4.11 SuDS**

The design brief shall incorporate principles of Sustainable Urban Drainage Systems in accordance with the requirements and standards of the Dublin City Councils Environment and Engineering Department.

Sustainable urban drainage systems (SuDS) measures will be required on all sites to be redeveloped. There will be a preference for SuDS features with biodiversity and amenity benefits over inert / hard SuDS features e.g. grass/planted swales, detention basins, infiltration basins, wetlands and storm water trenches in preference to attenuating in tanks, paving sub-base or cellular attenuation systems.

#### **5.4.12 Services/Utilities**

As part of the redevelopment of this site, the plan will look for the undergrounding of the ESB pylons on the site, the route of the cables to be agreed with ESB networks. All costs to be borne by the developers and the ESB. The masterplan for this site should allow for the provision of a new HV substation; the location and size to be agreed with ESB networks.

There is a large trunk 750mm watermain which runs diagonally through a number of the large development sites. There is a connection off this watermain where it crosses the Long Mile Road and the area is generally fed from this connection via a network of smaller pipes. Given the circumstances of this watermain and the fact that it passes through a number of large potential development sites, consideration could be given to the possible diversion of this watermain. The cost of such a diversion shall be agreed with Dublin City Council with proportionate costs borne by the site owner.

Where it is not proposed to relocate the watermain, the masterplan submitted for the site shall address how the principles of this LAP shall be achieved whilst also providing appropriate wayleave protection to the watermain. New development and/or works and landscaping will need to demonstrate that the existing network and associated wayleaves are protected from impacts which could put the network at risk of damage.

Developers shall protect the existing infrastructure on site, which includes all main water/drainage pipes, and any other overhead/underground services.

If the decision is made by the developer, with the agreement of Dublin City Council, to retain the route of watermain, this will impact on the design of the masterplan for the site. Map 5.9 is an indicative layout, based on the relocation of the watermain. If it remains, some elements of the proposed layout can be revisited to accommodate the route, and also to ensure that the route preserved becomes a benefit to the site, and that the urban design possibilities presented by the reservation are maximised to create an attractive pedestrian and green infrastructure corridor through the site. To achieve this, the need for a level of flexibility on the layout is recognised, including (i) the building line on the southern edge of the boulevard which may need to widen into a plaza, (ii) repositioning the green link through the residential area and associated re-arrangement of the residential areas. If this option is taken, the green link and the connecting boulevard can form a high quality pedestrian and cycle route, which will connect into the Green infrastructure network for the area

#### **5.4.13 Setbacks**

Setbacks shall be required on all road frontages (Long Mile Road, Walkinstown Avenue, and Naas Road), to accommodate the provision of new cycleways, dedicated bus routes, pedestrian footpaths, and green planting strips. These setbacks shall be agreed with the planning authority as part of the overall masterplan for the site.



**Map 5.8 Proposed Building Height - Nissan Site**





Map 5.9 Proposed Uses - Nissan Site





### Former Nissan Site Objectives

**NSO1.** To 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 district centre, all at sustainable densities within a vibrant and interesting environment and integrating with the wider plan area.

**NSO2.** Require a general height of between 5 and 6 storeys fronting onto Walkinstown Avenue, Longmile Road and Naas Road. Two landmark buildings of up to 10 storeys, one at the junction of Walkinstown Avenue and Long Mile Road, and one at the junction of Walkinstown Avenue and Naas Road. Heights ranging from 3 – 6 storeys within the core of the site

**NSO3.** Require setbacks ( to be agreed with the planning department) along the main road frontages at Naas Road, along the east side of Walkinstown Avenue and north side of Long Mile Road to facilitate widening of the road to provide for a bus lane, segregated cycleway and footpath allowing for an attractive and vibrant street environment and to encourage pedestrian and cyclist activity.

**NSO4.** Facilitate landuses that introduce active frontages along the Naas Road, Walkinstown Avenue and Long Mile Road, and priority pedestrian routes running through the site. Such uses may include local services such as retail, cafes, restaurants, leisure, cultural and community uses, reception areas to commercial areas above and other complementary active uses. Design of all units at street level should have a strong urban edge, convey openness and contribute to vibrancy in the public realm.

**NSO5.** Require the provision of a flexible and publicly accessible facility for community and/or health uses and a crèche in any redevelopment of this site to serve the needs of the residents in the area.

**NSO6.** Provide for a pedestrian and cyclist focused environment at street level. The majority of car parking serving commercial schemes shall be provided at basement or at undercroft levels provided such undercroft parking does not undermine the objective to provide active street frontages. A limited amount of well-designed car parking shall be facilitated at surface level (particularly within residential areas) subject to good design, integration with the street and with landscaping and/or street furniture.

**NSO7.** Provide for a clearly defined arrangement of public spaces which integrate into the emerging pedestrian/green routes and cycle network for the plan area and beyond and that increases permeability throughout the site by incorporating clearly defined east-west and north-south pedestrian and cyclist friendly routes through the site framed by buildings on both sides and containing active street level uses along these pedestrian routes allowing for passive supervision.

**NSO8.** Provide for boulevards traversing the large site in an east-west and north-south direction integrating with the local green links running through the site and integrating with the boulevard to be provided on the key site to the west of Walkinstown Avenue (the Motor Distributors site). This space shall incorporate street art, furniture and planting and SuDS, and shall be attractive space for relaxation. The boulevard shall be overlooked by residential and commercial on upper levels with ground levels dominated by retail units, cafes, cultural and/or community uses and other complementary uses.

**NSO9.** Assist in promoting modal shift to sustainable modes of transport by enhancing connections between the site and the Kylesmore Luas and Dublin Bus stops by providing for new pedestrian access points in all three boundaries of the site and providing for enhanced pedestrian crossings over the Naas Road and Walkinstown Avenue.

**NSO10.** To green and improve the major road arteries surrounding this key site i.e. Naas Road, Walkinstown Avenue, and Long Mile Road, to include wider footpaths, additional tree lines (incorporating native species), soft landscape zones, additional pedestrian crossing points, and off road cycle routes.

**NSO11.** To pilot and test new green infrastructure installations in the public realm to boost biodiversity and improve surface water management within the site, such as the provision of storm water tree trenches and permeable paving for parking areas.

**NSO12.** To seek the undergrounding of the 110 KV and 38KV high voltage overhead cabling traversing the LAP area. The route for undergrounding the cables will be assessed by ESB Networks with the applicants/developers, and in that event the cost of the undergrounding of the lines including associated civil works would be borne by the developers and ESB.

**NSO13.** To provide a new HV substation within the site, integrated with the undergrounding of cabling to meet the level of demand.

**NSO14.** As part of the redevelopment of this site the 750mm water-main may need to be diverted. Such a diversion would be at the expense of the developer(s).

**NSO15.** Local recycling facilities must be provided for on this key site. For large retail stores, a glass recycling facility shall be provided.

**NSO16.** To ensure that all applications address the following issues regarding water management:

- a. Prepare a site specific flood risk assessment of the site as part of the first application;
- b. Fully incorporate SuDS in the design of the overall scheme and accompanying masterplan;
- c. Put in place measures to protect water quality, addressing particularly the issue of discharges and runoff; and
- d. Manage water usage within the site to conserve consumption of treated water and make use of grey water and/or rainwater where suitable.

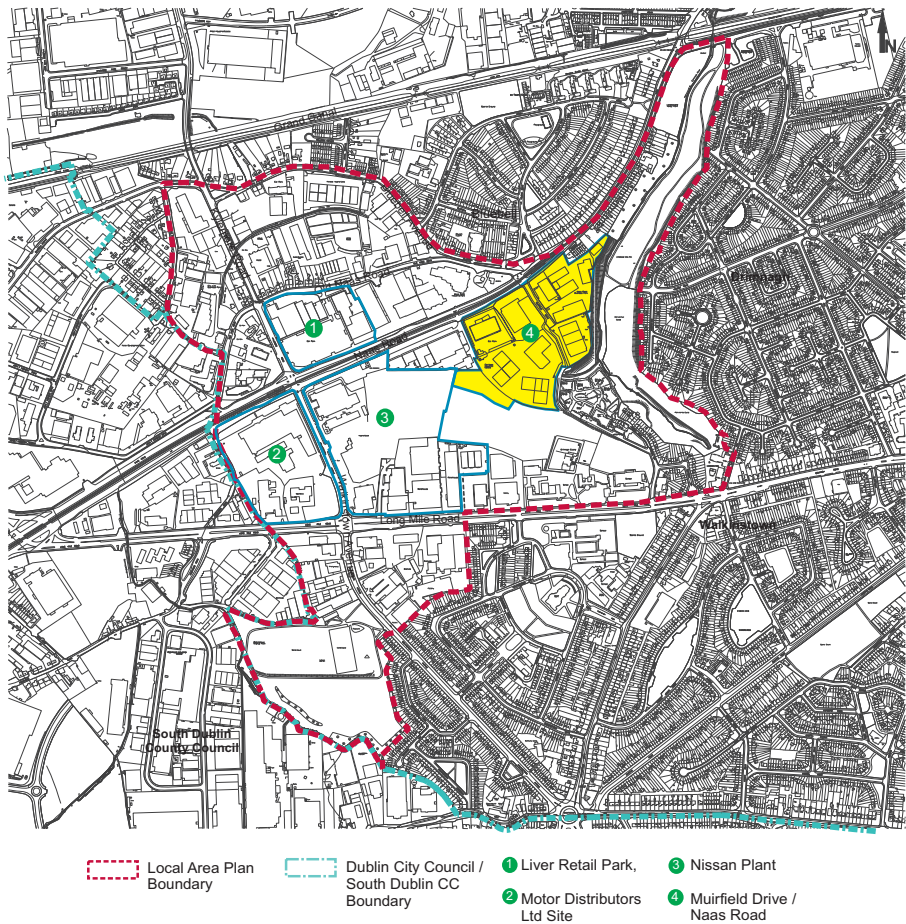


# 5.5 Muirfield Drive / Naas Road

## 5.5.1 Introduction

Whilst other site framework strategies provide guidance on a variety of planning parameters including block layouts, the purpose of this site strategy is to set a framework for land uses, access and other factors such as typologies and densities – but not to set any specific guidance in relation to layouts or blocks. This provides a degree of flexibility for the layout of future development whilst ensuring the desired land uses and other key planning parameters are delivered in any redevelopment of the area.

This site, positioned on the eastern side of the plan area, straddles the area between Bluebell and the River Camac, with Drimnagh Castle located further south and the former Nissan key site to the west. At present the area is characterised by industrial and office uses served by two roads accessed directly from the N7 (Naas Road). ‘Carriglea Industrial Estate’ is included in this area which appears to have been largely developed on an incremental basis over time. Whilst sites are generally large and in light or heavy industrial or warehouse use at present, a number of units incorporate office elements, particularly those units fronting the Naas Road, which are set back from the street by an attractive landscaped area.



Map 5.10 Key Site - Muirfield Drive / Naas Road

The majority of the units are of two-storey (or equivalent) height and are surrounded by sizeable hard surfaced areas. The vast majority of the area is zoned Z14, i.e. ‘to seek the social, economic and physical development or rejuvenation of an area with mixed use of which residential and ‘Z6’ would be the predominant uses.’ A narrow strip of land connecting the area around the River Camac to Muirfield Drive is zoned Z9 – i.e. ‘To preserve and improve recreational amenity and open space and green networks’ and this recognises the existing landscaped strip which bounds the vehicular access route to the existing residential area at Lansdowne valley, positioned south of the River Camac.

The entire area has good connectivity to public transport – with ease of access to various bus routes operating on the Naas Road and also easy pedestrian access to Bluebell Luas stop (Red Line). There are established residential areas immediately to the northeast (i.e. at Grove Court) and to the south – with apartment blocks at Lansdowne Valley positioned immediately across the river. There is however poor connectivity and accessibility to the amenities in the immediate area – particularly Lansdowne Park and the River Camac – and this is because of boundary structures, the scale of existing sites, and also differences in level/topography. The original route of the River Camac has been modified in the past by culverting the river on the western side of the site – the original position being reflected in the position of current site boundaries.

## 5.5.2 Future Direction

For this site it is not proposed to provide detailed indicative layouts due to the scale of the lands in question and the uniformity of uses proposed. It will however be a requirement that a masterplan be submitted for the overall site showing the design approach to be adopted and how each phase/site within the area will integrate. Because of multiple land ownership in the area, landowners will be required to cooperate in the preparation and agreement of an overall integrated site masterplan that delivers the objectives for this site framework strategy to the satisfaction of the Planning Department.

Given the locational advantages of this site and the proximity to amenities, it is considered that the existing Z14 zoning provides scope to redevelop the area and revisit land-use opportunities in order to work with the areas potential. In this regard the area is at present restricted in connectivity and relates poorly to the natural amenity potential of the River Camac and associated Green Infrastructure at Lansdowne Valley Park and Drimnagh Castle.

On this basis the City Council has developed a land-use strategy for the site which affords the opportunity to open up new open space along the river and secondly to establish a residential community which could avail of improved connectivity to the south and east – supplementing access out onto Naas Road. Mixed uses along the Naas Road can include neighbourhood retail uses in the illustrated areas – primarily to serve the new residential and working population.

It will be a requirement of future planning applications that a masterplan is submitted with the first phase of redevelopment of these lands, outlining the design approach to be adopted for developing the lands and how each phase can be integrated in future applications. Where possible, such a masterplan should be jointly prepared by all key landowners. If there is no consensus in this regard, planning applications will be assessed having regard to the proposed layout shown in Map 5.11, and addressing the importance of integration with adjoining sites. The detail of how this can be achieved should be agreed in advance with Dublin City Council.

## 5.5.3 Land-Uses

In regard to the indicated land uses on the accompanying map, -

- **Residential Uses** will occupy the majority of the site at sustainable densities. No housing shall be provided in areas in close proximity to the Naas Road due to noise and other disamenity associated with traffic, and also to allow the option of additional height to frame the expanse of the Naas Road. Hence mixed uses/retail have been designated for this area.
- **Retail uses** will be of neighbourhood ‘local services’ type – i.e. to serve the immediate local residential and working population only. They should also be for the sale of convenience goods only. No individual retail use should exceed 200 sq metres (net) to ensure a local/neighbourhood scale and secondly to avoid any negative impact on the successful delivery of retailing associated with the KDC. Proposed retail uses would benefit from an attractive setting (existing landscaping to be retained) and from new green routes.
- **Mixed uses** – i.e. commercial/ office/ enterprise uses. These should be of a scale and intensity that would not be a cause of any significant disamenity to future residents of the immediately adjoining residential areas.
- The chosen location for new **open spaces** shall take cognisance of existing open spaces and supplement these by the removal of existing barriers/boundaries to restore more natural vistas along the River Camac. The extent and area of open spaces shall be informed *inter alia* by flood risk assessment on individual sites and the desire to create new green connections between this area and surrounding existing and new communities. Gradients/slopes for any proposed development should receive due attention in any layout design having regard to the presence of existing steep topography adjoining the river.



5.5.4 Heights

In general, heights shall comply with current development plan standards. The only exceptions shall be ;

- (a) Mixed-use units fronting the N7/Naas Road can develop up to 5 storeys in height so as to assert a strong visual presence onto the open space and adjoining N7 route.
- (b) Street corner units/blocks within the residential element of the scheme may be permitted to extend up to 5 storeys where a coherent urban design strategy seeks these heights for legibility purposes. Such height may also be considered in areas immediately adjoining larger public open spaces.

5.5.5 SuDS

The design brief for the site shall incorporate principles of Sustainable Urban Drainage Systems in accordance with the requirements and standards of the City Councils Environment and Engineering Department.

Sustainable Urban Drainage Systems (SuDS) measures will be required on all sites to be redeveloped. There will be a preference for SuDS features with biodiversity and amenity benefits over inert / hard SuDS features e.g. grass/planted swales, detention basins, infiltration basins, wetlands and storm water trenches in preference to attenuating in tanks, paving sub-base or cellular attenuation systems.

5.5.6 Access

Pedestrian and cycle access through the site will be advanced over time through redevelopment of existing industrial areas and secondly through the implementation of new green routes in association with the Green Infrastructure Strategy. These Green Routes shall restore access along the banks of the River Camac (including along an area to be de-culverted and restored with a riparian strip to create a new linear park) and this link will provide a new through route from Mourne Road in Drimnagh, to the N7 in the vicinity of Bluebell Luas stop.

It is also envisaged that connectivity to Drimnagh Castle would be improved via this new green new link along the River Camac. Permeability through to the existing access route running through Lansdowne Valley would also be greatly enhanced - encouraging a greater level of pedestrian/cyclist use.

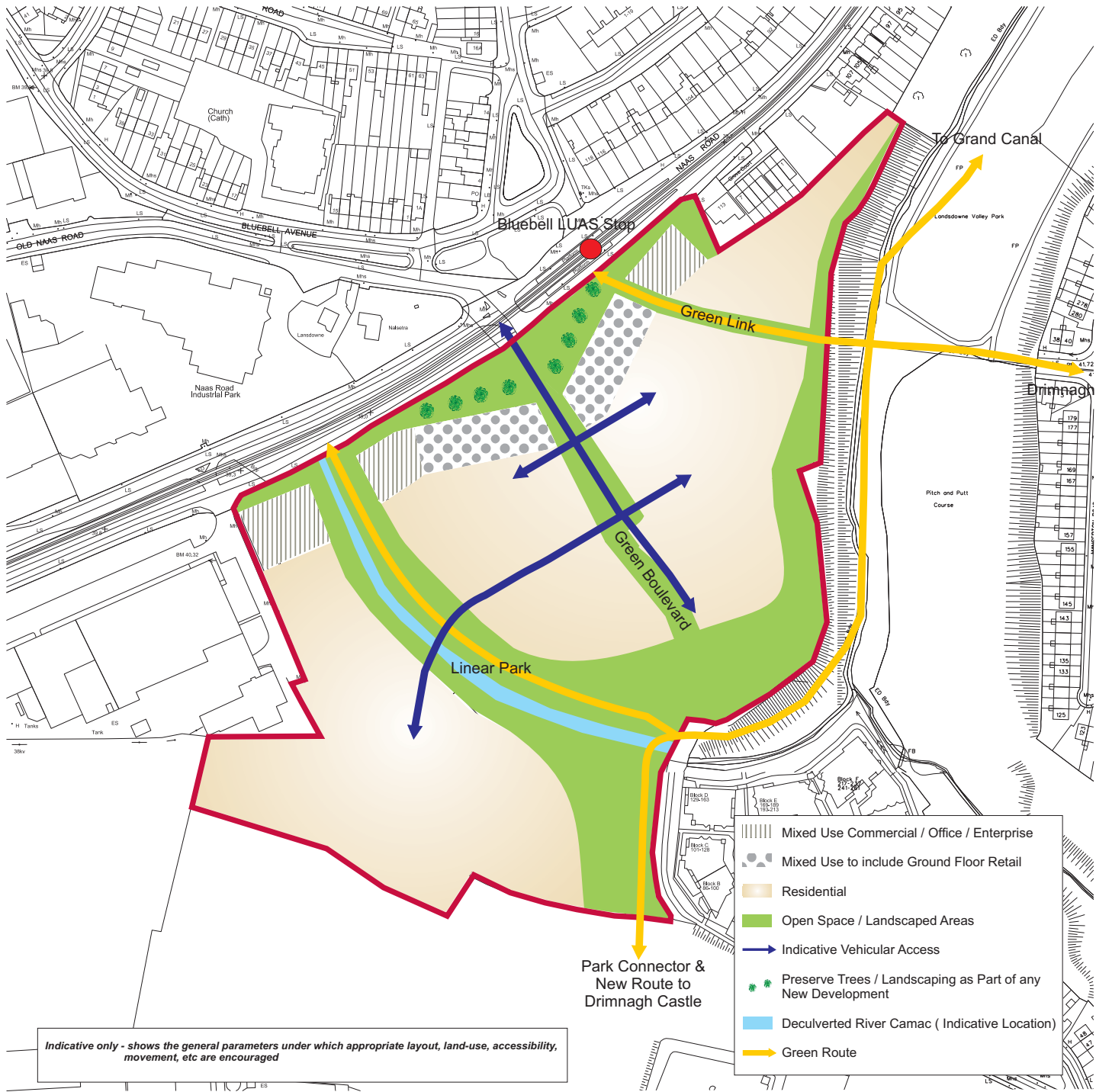
Connections provided by the Green Infrastructure Strategy for the wider area will deliver a continuous route through Lansdowne Valley to the Long Mile Road, boosting use of the route.

5.5.7 Housing density and typologies

Net residential density on this site should be at approx. 45-50 units per hectare (excluding main roads and public open spaces). In relation to building typologies, a range of unit types is desirable, with a mix of unit sizes and designs providing functional and visual variety.To assist in devising

designs for residential schemes, the development plan provides direction in regard to residential layout/design and also sustainable building design and site design. This guidance and set of standards encourages best current practice.

Map 5.11 Proposed Layout for Muirfield Drive / Naas Road





### Muirfield Drive / Naas Road Key Objectives

**MDNR01.** To develop land uses in accordance with the accompanying map – framing the Camac Valley and integrating with adjoining residential areas. Predominantly residential land uses are proposed in place of existing industrial lands, whilst mixed uses and some supporting retailing are sought on the northern side of the site fronting the N7 road route. New public open spaces will be provided along the River Camac to support biodiversity.

**MDNR02.** To deculvert that section of the River Camac on the western side of the site, thereby providing a new north-south green infrastructure link and linear park - integrating with other proposed routes connecting to the wider area.

**MDNR03.** To resolve key blockages in the existing Green Infrastructure by expanding Lansdowne Valley Park and establishing new green routes including ;

- a) A new 'short-cut' east-west route from Mourne Road in Drimnagh, via Lansdowne Valley Park, to Naas Road and Bluebell Luas stop.
- b) A link to the south towards Drimnagh Castle and Long Mile Road

**MDNR04.** To accommodate access for the majority of vehicular traffic for the new area via the existing entrance position at the Muirfield Drive/N7 junction.

**MDNR05.** That a masterplan is submitted with the first phase of development outlining the design approach to be adopted for developing the lands and how each phase can be integrated in future applications.

**MDNR06.** To ensure flood risk considerations are adequately considered in the design of the linear park and protect the Naas Road and adjoining properties from increased flood risk.

**MDNR07.** To retain and enhance existing planted areas and mature trees positioned along the Naas Road near the existing entrance to Muirfield Drive and to integrate them into any new development.

**MDNR08.** To ensure that all applications address the following issues regarding water management:

- a. Prepare a site specific flood risk assessment of the site as part of the first application;
- b. Fully incorporate SuDS in the design of the overall scheme and accompanying masterplan;
- c. Put in place measures to protect water quality, addressing particularly the issue of discharges and runoff; and
- d. Manage water usage within the site to conserve consumption of treated water and make use of grey water and/ or rainwater where suitable.



# Chapter 6 – Implementation & Monitoring

## 6.1 Introduction

The Naas Road LAP outlines the vision for the lands and a physical framework for activating that vision. The LAP through its policies and objectives will thereby inform both the preparation and assessment of detailed planning applications and master plans.

The responsibility for the implementation of policies and objectives contained within the LAP will be dependant on a number of possible sources, including Government Departments, Infrastructure providers, Dublin City Council and the private sector.

The success of the plan will be measured with the degree of implementation that is achieved over the lifetime of the plan in the next six years. The objectives set out in the plan need to be realistic in terms of funding capabilities and implementation structures.

The funding of the plan falls within three sectors, 1) the national government, either directly or through the guise of public utilities, 2) the Council and 3) the private sector.

Dublin City Council will actively undertake a leadership role to progress and secure the implementation of the LAP. This will involve a collaborative approach with citizens, stakeholders, sectoral interests, city partners, and the adjoining authority, South Dublin County Council, to achieve collective support and successful implementation of the plan.

## 6.2 Masterplan Requirement

In the redevelopment of the key sites, all key stakeholders shall be required to produce a detailed site master plan accompanied by a clearly articulated design statement. This masterplan should be agreed with Dublin City Council in advance of any major planning application. Where a landholding immediately adjoins other lands within a key site, master planning should give due consideration to the anticipated roll-out of development on such land. Of particular importance in this plan is the KDC designation and the delivery of employment generating mixed uses including retailing. Delivery of new green links and improvements in public realm shall be given due consideration when masterplans are being considered and the Council shall have regard to community gain. Residential uses are particularly sensitive to impacts of surrounding construction, and this should be given full consideration in relation to master planning.

In situations where a key site is in multiple ownership, the Planning Authority shall have discretion in regard to determining the rollout of development in instances where some owners are more ready than others to progress development– i.e. the achievement of the objectives for the site as set out in this plan shall not be unnecessarily delayed.

Key Sites



- Key Sites:**
- 1: Royal Liver Retail Park
  - 2: Motor Distributors Ltd
  - 3: Nissan Site / Site Fronting onto Long Mile Road
  - 4: Muirfield Drive / Naas Road

The masterplans shall address the following key issues:

- Site Layout
- Land Uses
- Building Density
- Building Height
- Urban Design
- Community & Social Infrastructure
- Education
- Open Space
- Public Realm
- Permeability
- Heritage/Conservation
- Car parking & Vehicular Access
- Natural Heritage
- Environmental Impact Assessment
- Construction Management
- Phasing & Implementations
- Monitoring
- Infrastructure
- Flood Risk
- Green Infrastructure
- SuDS
- Landscape Design



### 6.3 Possible Barriers to Development

The implementation of this Local Area Plan may be constrained by a number of elements, namely the current economic climate, allocated Local Authority funding, availability of funding from other sources, and other infrastructural constraints. The nature of statutory development plans is such that no budget is agreed in advance and therefore no funding of projects or implementation of all objectives within the plan is guaranteed in advance.

There are a number of high voltage cables running through the LAP lands, which consist of a double circuit 110kV line and a single circuit 38kV line, originating in the Inchicore 110kV substation. The 38KV and in particular the 110KV power lines impose restrictions with regards to development and visual amenity of the area. There is an 80 metre restriction corridor around the 110kV line, i.e 40m corridor each side. As part of implementation of the LAP and the phasing of development on the key sites, the undergrounding of the power lines must be taken on board in the masterplans for the sites. This will need co-operation between the individual land owners.

There is a large watermain running diagonally through three key sites, and this may have to be relocated to facilitate the development of these sites.

Development in the LAP lands is also dependent on capacity being available in the Ringsend Treatment Plant. Development will only be permitted in tandem with available water supply, waste water treatment and network capacity.

There are also a number of Seveso sites, although not within the LAP lands, these are located in close proximity in South Dublin County Council lands (see section 2.1.2) which would be within the consultation zone for these facilities. These must be taken into account for all new development.

Dublin City Council will take an interdepartmental approach to the implementation of this local area plan, and also will engage with the Department of the Environment, Community and Local Government, the NTA, Department of Education and Skills, the Offices of Public works, and other relevant agencies to coordinate the delivery of key infrastructure in this area.

### 6.4 Community Gain

It is important that the Local Area Plan delivers a balanced approach to the future development of the Naas Road Lands through the delivery of enhanced public realm, greater connectivity between the key sites for pedestrians and cyclists, new green routes, and improvements and delivery of key infrastructure.

New developments in the area will generate an appropriate financial return for the landowners, which will underpin investment and support the viability of community and social infrastructure. It is considered reasonable therefore that the identified key development sites shall each contribute to the provision of new community and cultural infrastructure to serve the local area and wider community. The delivery phasing, operation and the costs associated with the provision of new community and social infrastructure shall be the subject to detailed negotiations between the developer, the planning authority, statutory agencies and key stakeholders.

### 6.5 Public Realm

The public realm areas of the Naas Road Area are likely to be completed on a staggered timescale, when the key sites come up for redevelopment. It is important that the masterplans ensure a consistent high quality approach to the treatment of the public realm.

Street furniture should have a contemporary character, and will be simple, robust and elegant. It is important in the redevelopment of the key sites, that soft landscaping be introduced into the public realm proposals. All Landscape Design / Green Infrastructure proposals in the public realm areas would be subject to liaison with the Parks and Landscape Division in Dublin City Council, and should be consistent with any objectives set out in the Green Infrastructure chapter. Signage in the public realm areas will be restricted and shall be simple and legible, and consistent throughout the plan area.

### 6.6 Social and Affordable Housing

All residential and mixed use development will be required to comply with the Dublin City Housing Strategy as prepared under Part V of the Planning & Development Acts.

### 6.7 Contributions - Section 48 Levies

All development proposals within the local plan areas are subject to general financial contribution levies as set out under the Dublin City Council Development Contribution Scheme made under Section 48 of the Planning & Development Acts, towards expenditure by City Council for works including roads, water and drainage scheme, open spaces, cultural/ arts projects and other amenities which facilitate development.

### 6.8 Temporary Uses

Due to the current economic climate there is a possibility that a number or sections of the sites within the LAP area that are currently vacant or underutilised may remain so in the short/medium term. Dublin City Council will adopt a dual approach of 1) ensuring vacant sites are managed properly so that sites are kept clear of debris, buildings secured, and boundary treatments are attractive and maintained and 2) encouraging temporary uses on these sites to bring activity and vitality to the area.

Temporary uses on vacant sites may include:

- 'Greening' to create a temporary park/biodiversity space
- Landscape screening and attractive railing to reduce negative visual impacts of rear elevations/vacant sites/exposed boundary walls
- Use of space for local events, projects or festivals.
- Allotments or community gardens
- Start up business/innovation activities
- Temporary artistic 'fake' frontages.
- Limited surface parking until sites are redeveloped
- Visual arts projects which enliven the public realm

### 6.9 Construction Phase

Dublin City Council recognise the negative impacts albeit short term, that large scale construction projects can have on local businesses and community in terms of dust, noise and other nuisances. All major planning applications will be required to be accompanied by a construction management plan to mitigate against any adverse impacts on the local business and community.

### 6.10 Taking in Charge

Dublin City Council is committed to the taking in charge of the public areas of developments, including where appropriate new community, social and recreational facilities. In this regard applicants should refer to guidelines for Open Space Development and Taking in Charge ( Parks and Landscape Services vision 2009) and the overall approach to the taking in charge of completed developments of public spaces shall be agreed in accordance with the relevant stakeholders during the individual key site masterplan preparation process.

For residential schemes clarity at application stage needs to be provided regarding the extent and scale of management companies (if such are proposed) and the extent of areas to be taken in charge or not.



### 6.11 Phasing

With regard to phasing, it will be an objective of Dublin City Council to promote the implementation of the LAP in a rational and sequential approach that is in keeping with the proposed development strategy, and to ensure that essential facilities (such as road infrastructure, water, sewerage, undergrounding pylons) are secured and in place concurrent with the development of the key sites. As this LAP is not greenfield, but a regeneration area comprising of separate distinct sites, a large scale phasing plan is not appropriate. The sequence with which these schemes will be advanced determines the sequence and phasing of development in the key sites.

Having regard to the large land parcels that the key sites occupy, this plan does not demand the delivery of key site strategies in any specific order as this may preclude build-out of desirable development in association with improved market forces. Nonetheless, Dublin City Council recognises the functional interrelationship between key sites in regard to land uses, urban design and linkages - and it is critical that masterplanning addresses this.

It is an objective of the Planning Authority to ensure that essential facilities such as road infrastructure, water, and sewerage networks etc, are secured in tandem with the proposed development of the key sites and that later phases within each key site are appropriately managed, secured or landscaped until their future development.

Dublin City Council reserves the right to refuse development on the grounds of it being premature pending the provision of physical infrastructure or the provision of infrastructural capacities. The phasing of the various key sites will also be dependant on waste water treatment being available at the Ringsend Treatment Plant.

In setting out both masterplan and individual planning applications it is a requirement that key internal connections are delivered at an early stage in the phased development of each key site. The complete severance of routes by the non development of a large sections of the site on a medium or long term basis whilst awaiting development will not be accepted. Sites should be sub-divided with safe, attractive connections provided. Some of these connections can be temporary, providing connectivity until the final elements of the site are delivered. Provision of dead-ends or cul-de-sacs should be avoided. In delivering connectivity, a key element that must be provided in the early phases of the sites is the east west connecting boulevard for both the MDL site and the Nissan key site. For the Muirfield and Nissan sites, new development must provide for vehicular, pedestrian and cycle interconnectivity with adjoining lands (the detail of which must be agreed with Dublin City Council) to allow both residential areas fully integrate.

### 6.12 Monitoring and Review

The Naas Road Local Area Plan will have effect for a period of six years in accordance with the Planning and Development Acts 2000 – 2010. Thereafter the LAP will be reviewed or extended as appropriate by resolution of the members of Dublin City Council to reflect any changed planning policy or circumstance in addition to altered market conditions.

It is the role of Dublin City Council to put in place a structure for the continual monitoring and progress review of the LAP and its objectives.

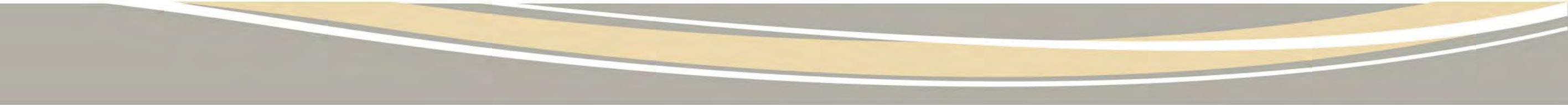
In order to ensure that the development strategy outlined in this Local Area plan is being delivered, Dublin City Council through its development management functions will monitor the implementation and phasing of this Local Area Plan. A review will assist in assessing whether the objectives detailed in the plan are being met.

### 6.13 Transitional Arrangements

Once formally adopted this local area plan will apply to all planning applications lodged to the Planning Authority in the plan area. In the interim period, prior to the formal adoption of this local area plan, the Planning Authority can have regard to the contents of the plan in the assessment of planning applications.







# Appendices



# Appendix 1: Flood Risk Assessment

## Introduction

This Flood Risk Assessment was prepared and informed by the DoEHLG Guidelines for Planning Authorities (DoEHLG & OPW, 2009) on 'The Planning System and Flood Risk Management' (and Technical Appendices). The Guidelines state that planning authorities are required to introduce flood risk assessment as an integral and leading element of their development plan functions. It sets out that development plans and local area plans, must establish the flood risk assessment requirements for their functional area.

A Strategic Flood Risk Assessment (SFRA) is an area wide assessment of the existing risks of flooding and the impact on those risks arising from proposed spatial planning decisions. The assessment will focus on Stage 1 primarily (Identification of Flood Risk) , where, in general the need for a more detailed flood risk assessment is flagged (Stage 2).

The guidelines require the planning system at national, regional and local levels to:

- a) Avoid developments in areas at risk of flooding, particularly floodplains, unless there are proven wider sustainability grounds that justify appropriate development and where the flood risk can be reduced or managed to an acceptable level without increasing flood risk elsewhere.
- b) Adopt a sequential approach to flood risk management when assessing the location for new development based on avoidance, reduction and mitigation of flood risk, and
- c) Incorporate flood risk assessment into the process of making decisions on planning applications and planning appeals.

## Stages in the Assessment of Flood Risk

**Stage 1 – Flood Risk Identification** - to identify whether there may be any flooding or surface water management issues related to the plan area. This stage mainly comprises a comprehensive desk study of available information to establish whether a flood risk issue is existing or whether one may exist in the future.

**Stage 2 – Initial flood risk assessment** – If a flood risk issue is deemed to exist arising from the Stage 1 Flood Risk Identification process, the assessment proceeds to Stage 2 which confirms the sources of flooding, appraises the adequacy of existing information and determines the extent of additional surveys and the degree of modelling that will be required. Stage 2 must be sufficiently detailed to allow the application of the sequential approach within the flood risk zone.

**Stage 3- Detailed Risk Assessment** – Where Stages 1 and 2 indicate that a proposed area of possible zoning or development may be subject to a significant flood risk, a Stage 3 Detailed Flood Risk Assessment must be undertaken.

The general approach is to avoid development in areas with a significant risk of flooding, and where development in floodplains cannot be avoided, to take a sequential approach to flood risk management based on avoidance, reduction and mitigation of risk.

As part of stage 2, a Flood Zone Map for the plan area must be prepared drawing on the most up to date available information. This map provides information on three zones of flood risk in the study area. Zone A where there is a high probability of flooding, Zone B where there is a moderate probability of flooding and Zone C where there is a low probability of flooding.

It is important to note that the above zonal approach and the flood extent maps only cover fluvial flood risk / flood plains etc. The flood extent maps should not be used to suggest that any areas are free from significant flood risk, since these maps do not include the effects of other forms of flooding such as groundwater, pluvial Flood Risk, infrastructural/sewer failure and overflows from dams, etc.

## Existing Environment - Identification of Flood Hazards

This section provides a description of spatial distribution of flood risk at appropriate scales for the Local Area Plan, based on available information.

The Grand Canal, which is a man made waterway runs in an east west direction to the north of the LAP area linking the river Liffey at Dublin with the Barrow at Athy and the Shannon, at Shannon Harbour. The river Camac enters into the functional area of Dublin City Council at the Old Naas Road and makes its way to the river Liffey at Heuston Station, Islandbridge via a series of natural open channels, mad-made channels and culverts. There are four stretches where the river channel is open and natural but these are so short and far apart that the river is essentially a heavily modified water body and has been designated as such in the River Basin Management Plan. The river passes through a number of industrial estates and residential areas as it flows into the city. The Robinhood stream, the Gallblack stream (including the Blackditch and Gallanstown streams) and the Walkinstown Stream all discharge to the river Camac. An extensive surface water drainage network discharges to the River Camac and a significant number of combined sewer overflows also discharge to the river and its tributaries.

Historically, flooding in the catchment has posed a problem within the heavily urbanised areas causing damage to adjacent river properties. However some flood alleviation measures have recently been undertaken on the main channel at Corkagh Park in Clondalkin, and along the Robinhood stream. The river drains large areas of residential and industrial lands and two major roads, the Western Parkway Motorway (M50) and the N7 Naas Road.

The drainage network in this area is a partially separate system in which foul sewage, together with some surface water is carried by an individual system of sewers to the Grand Canal Tunnel sewer and the balance of the surface water is collected in an independent system of surface water sewers ultimately discharging in to the River Camac. As the pipe network in the city centre catchment area is flowing at capacity, all new flows will

be directed to the Grand Canal Tunnel through the 9B sewer serving the area. There are many misconnections of foul sewers to surface water infrastructure in the old industrial brownfield sites that make up much of this area, these are being addressed as far as is possible.



In terms of the general performance of the pipe network in the Naas Road catchment, this varies from poor to reasonable. The Naas Road Local Area Plan area drains to two separate catchments. Most of the area is connected to the Grand Canal Tunnel catchment with a small area at the northern end connected to the city centre catchment. Both catchments ultimately discharge to the Regional Waste Water Treatment Plant at Ringsend. As of 2012, this facility is operating at its design capacity. Dublin City Council, is currently finalising proposals to increase capacity of the plant at Ringsend from 1.7 million PE (population equivalent) to 2.1 million PE, with a target completion date of 2015.

Although the River Camac runs through the eastern part of this LAP, there is a very limited surface water network connected to it. Most of the surface water pipes in the area discharge to combined sewers. It is not sustainable to allow storm water flows continue in the combined system as the cost of pumping and then treating 'clean' storm water is significant.

The storm water flow should be separated out using modern sustainable drainage systems. All new developments will be required to implement these principles by treating their storm water flows on site to ensure volumetric reduction and qualitative improvement of the storm flows. Examples of systems include soakaways and rainwater harvesting. Other systems can be viewed on [www.irishsuds.ie](http://www.irishsuds.ie).





## Flood Zone Map

In preparing a flood zone map for the Naas Road Lands, the most suitable and most recent source of information is the Catchment Flood Risk Assessment and Management Studies (CFRAMS) which are being carried out by Dublin City Council and adjoining authorities in conjunction with the OPW.

In June of 2011 the Minister of State at the Department of the Finance with special responsibility of the Office of Public Works announced that RPS consulting engineers have been appointed to carry out a major study of flooding in the Eastern River Basin District catchment. This will identify in detail the causes of flooding throughout the catchment and produce an integrated plan of specific measures to address the significant flood risk factors in a proactive and comprehensive way. The Eastern River Basin District includes Co.Dublin and portions of Cavan, Kildare, Louth, Meath, Offaly, Westmeath, Wexford and Wicklow. The CFRAMS study is part of a programme being undertaken by the OPW in line with current national flood policy and the EU Directive on the Assessment and Management of Flood Risk which requires that such studies be completed for each catchment by 2015. The CFRAMS plans are due December 2015 with flood maps due December 2013.

In the absence of the CRAMS study, the main information to be used for the flood mapping comes from the Greater Dublin Strategic Drainage Study (GDSDS) which shows the computer modelled 1 in 100 year flood event extent; and also from a number of other sources below:

- Responses from statutory bodies during the consultation process were examined, with particular reference to concerns relating to flood risk.
- The nature and location of the area in the vicinity of the proposed development was described in terms of the existing hydrological environment.
- The existing site geology and hydrogeology was examined in terms of how they relate to the flooding history and the potential for drainage methods of the proposed scheme.
- All existing historical information on previous events, studies and surveys, was examined as made available from the Office of Public Works (OPW) flood hazard mapping website. [www.floodmaps.ie](http://www.floodmaps.ie).

The GDSDS was commissioned in 2001 to identify policies and works leading to the development of a sustainable drainage system for the Greater Dublin Area. As part of this study drainage models were produced for a number of foul and stormwater catchments including the Tolka River, the Camac River and Santry River. 100 year flood extent maps were prepared for each of the catchments as part of the studies. These maps were studied in the preparation of this flood risk assessment.

The main flood risks identified in the GDSDS for this area are flooding points 11 to 15 which refer to 100 year flooding of portions of Lansdowne Valley Business Park, Riversdale Industrial Estate, Bluebell Avenue, Sheldon Park Hotel (although some river widening has been carried out subsequently) and Kylemore Road.

The main risk to the Naas Road Area would be from both pluvial and fluvial flooding. All the areas identified above would be in Zone A when referring to the National Flooding Guidelines. The GDSDS did not carry out a 1,000 year flood extent map so Zones B and C cannot be accurately delineated until flood map outputs from the Eastern Region Catchment Flood Risk Assessment and Management Study are received around the end of 2013, however any development adjacent to Zone A must be considered to be in Zone B unless disproved by hydraulic analysis. A significant amount of road flooding is also indicated by the computer models in the 100 year event, especially on Bluebell Avenue and the Longmile Road.

For the purposes of this study an indicative 20m band outside the Flood Zone A has been identified which will act as a rough estimate for Flood Zone B.

As can be seen from the above, five specific areas have been identified in the GDSDS with potential conflicts between development and flood risk. These areas identified on the Flood Risk Map will be subject to a site specific flood risk assessment appropriate to the type and scale of the development being proposed. Mitigation measures will be incorporated to ensure that any development taking place will not exacerbate any flooding issues.

The five areas involved are largely confined to existing industrial estates and some existing residential area. These areas will be identified on a Flood Risk Map to accompany the plan and a policy will be included to state that any development proposal in these areas will be subject to a site specific Flood Risk Assessment appropriate to the type and scale of development being proposed. Mitigation measure will ensure that any development taking place will not exacerbate any flooding issue.

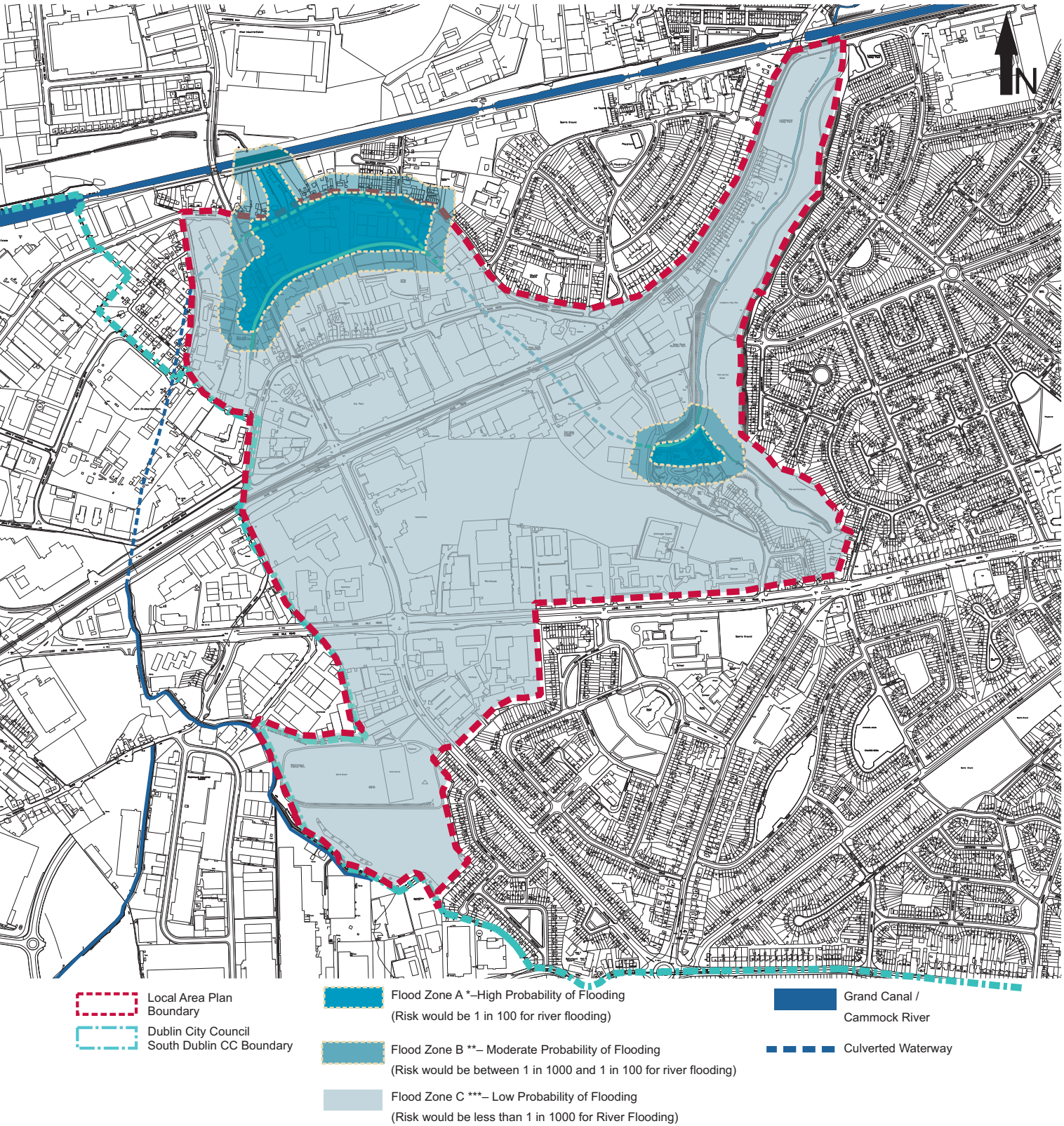


### OPW Classification of Flood Zones

Flood Zones are geographical areas within which the likelihood of flooding is in a particular range and they are a key tool in flood risk management within the planning process as well as in flood warning and emergency planning. There are three types or levels of flood zones defined in the DECLG and OPW Guidelines on Flood Risk Management:

- Zone A – High probability of flooding – Where the average probability of flooding from rivers and sea is highest (greater than 1% annually or more frequent than 1 in 100 years for river flooding or 0.5% annually or 1 in 200 years respectively for coastal flooding). Most forms of development are deemed to be inappropriate here, only water compatible development including essential infrastructure which cannot be located elsewhere, would normally be allowed
- Zone B – Moderate probability of flooding – (Risk between 0.1% annually or 1 in 1000 and 1 % annually or 1 in 100 years for river flooding, and between 0.1% or 1 in a 1000 years and 0.5% annually or 1 in 200 years for coastal flooding) highly vulnerable development including hospitals, residential care homes, Garda, fire and ambulance stations, dwelling houses and primary strategic transport and utilities infrastructure would generally be considered inappropriate unless the requirements of the justification test is met. Less vulnerable development such as retail, commercial and industrial uses, short term let for caravans/camping, and secondary strategic transport and utilities infrastructure might be considered appropriate in this zone. Less vulnerable development should only be considered in this zone if adequate lands or sites are not available in Zone C and subject to a flood risk assessment to the appropriate level of detail to demonstrate that flood risk to and from the development can or will be adequately be managed.
- Zone C – Low probability of flooding – (Risk is less than 0.1% annually or 1 in 1000 years for both rivers and coastal flooding) Development is appropriate from a flood risk perspective (subject to flood hazard from sources other than rivers and coast meeting normal proper planning considerations).

### Flood Zones





## Mitigation Measures Proposed

The Greater Dublin Strategic Drainage Study made a number of recommendations to address the flooding issues in the most extreme scenario (2031). In their report, the areas which showed the most network deficiencies were in the older areas of the catchment. In Dublin City Council the following industrial areas such as Bluebell, Ballymount and Cookstown Industrial Estate, where solutions generally involve upsizing of pipes. In Walkinstown flooding in this area is unverified and it was recommended in the report that a detailed study be carried out, which included manhole and CCTV surveys. There were also a number of areas identified in the minor network of the catchment where non critical flooding was predicted. This is addressed in a single drainage development option which proposes upsizing of smaller pipes across the network. The following areas were found to be at risk of flooding during the option development in the catchment namely, a) Kilmainham b), Kylemore Road/Bluebell Avenue, c) Robinhood Industrial Estate, d) Nangor Road Industrial Area, and e) Clondalkin. In general, the primary solution at each deficiency was the upgrade of structures on the river to reduce afflux and backwater effect. Where this was not possible, or where the effects would be minimal, it was recommended that flood protection walls and embankments be constructed to the height of the peak predicted water level + 300mml freeboard. The solution for flooding upstream of culvert CAM-CU10 under Kileen Road included a recommendation for the addition of a further 200,000m3 of attenuation area in Corkagh Park. It was recommended in the GDSDS that a more detailed study of the Camac River catchment be done to confirm the ultimate feasibility of this option.

## Surface Water Management

Apart from recommendations made in the GDSDS, It is important that any new developments in the Naas Road LAP area deal with surface water at source, wherever feasible. The following principles should also be applied in the redevelopment of large brownfield sites, which will help reduce surface run off.

- Attenuating and filtering in the drainage layer of green roofs, podium gardens and tree planting pits at basement level.
- A porous approach to streets and hard landscape space, using permeable surface and storm water attenuating tree trenches.
- Preference for SuDS features with biodiversity and amenity benefits over inert/hard SuDS features e.g grass/planted swales, detention basins, infiltration basins, wetlands and storm water tree trenches in preference to attenuating in tanks, paving sub-base or cellular attenuation systems.
- In keeping with the Greater Dublin Strategic Drainage Study (2005), Sustainable Drainage Systems (SuDS) techniques will be incorporated into the development. The drainage strategy for the site will also take due cognisance of the objectives of the Flood Resilient City Project, which promotes an integrated approach to flood risk management, if it's results are available at the time of application.

This project promotes 'Awareness, Avoidance, Alleviation and Assistance' when considering pluvial flood management. The OPW National Pluvial Study carried out by HR Wallingford should also be consulted.

- As part of the implementation of the local area plan, Dublin City Council will seek to remove the storm runoff from the combined system. In some cases, this will require new surface water pipes to be constructed. Any development in this area will be expected to manage surface water in accordance with modern sustainable principles to minimise peak flows in the system, for example, green roofs or rainwater harvesting.
- In the longer term Dublin City Council will explore more ambitious flood alleviation measures. After recent flood events in October 2011, which were the equivalent to a 1 in 100 year flood event, a large number of areas flooded due to large volumes of surface water entering the Camac, this led to substantial flooding downstream in the river. One future option to be considered is to introduce a flood relief scheme in Lansdowne Valley Park, which could include removal of the concrete channel from the north section of the river and reinstatement of natural riverbank vegetation or perhaps an area of wetland, which would be allowed to flood in times of increased volume in the river.

## Settlement Strategy and Flood Risk

It is the strategy of Dublin City Council in accordance with the Guidelines to reduce the potential risk to people, property and the environment caused by flooding, through a hierarchy of avoidance, followed by substitution of lower vulnerability uses and, only if avoidance and substitution are not possible, reduction and management of the risks through a variety of techniques. Dublin City Council will continue its policy to steer new developments on Greenfield sites to areas with the lowest probability of flooding. Areas with moderate or high risk will require site specific Flood Risk Assessments in any new planning applications, and a subsequent Justification Test.

## Conclusions and Recommendations

Until the CFRAMS Study is completed and the flood protection and management options are finalised, the flood maps should only be taken as indicative. All planning applications will be required to submit a site specific flood risk assessment addressing risks from all sources of flooding. All new development will be required to comply with the Greater Dublin Strategic Drainage Study for surface-water management, with possible provision for the High End Future Scenario. This will ensure that there is no increase in flood risk to properties downstream as a result of future development. In addition, in order to mitigate against the effects of flooding to new development, floor levels should be set to recommended levels. It is anticipated that specific recommendations for floor levels may issue from the CFRAMS Study. In the meantime, a precautionary approach should be taken of the 100 year fluvial flood level plus a minimum of 10% increase in rainfall intensity plus 300mm freeboard. An assessment of the effects of existing development within the LAP lands on flood risk to properties

downstream will be undertaken, and where possible, recommendations made in relation to possible retrofitting of additional flood storage areas within LAP lands in order to bring existing development in line with current best practice flood management methods. This may result in the creation of areas of multi-functional recreational space within the LAP lands using principles of sustainable drainage design.

## Policy Requirements for Naas Road Local Area Plan

The following policies and measures are applicable to all development within the Naas Road LAP.

**FRA1** - All planning applications, for proposed development within the LAP area should include a site specific flood risk assessment (FRA)

### FRA (a) - Risk to other development

- If the development does not result in increased discharge to foul or surface-water sewers, then it can be confirmed in the FRA that the development does not cause an increased flood risk to other areas. Note that since the publication of the GDSDS, it has been a requirement that surface-water discharge rates are limited to green-field rates for the development, so compliance with this requirement for all pluvial event results in compliance with flood risk management guidelines for surface-water discharge. This requirement is best achieved by properly incorporating SuDS techniques into the development.
- If the development does result in increased discharge rates to sewers, then the developer may be required either to confirm that there is adequate capacity in the local network to cater for the increased flows without surcharge of the system or to propose a flood management solution to cater for the additional flows.

### FRA (b) - Risk to the development itself

- The FRA should address risks from all sources, including but not limited to coastal, fluvial and pluvial sources, possible flooding from sewer surcharging and flooding from groundwater.
  - i) Incorporating storage within the development to cater for surface-water falling within the development for up to the 100-year pluvial (with climate change factor of a minimum of 10% applied as appropriate).
  - ii) Designing floor levels. A precautionary approach should be taken of the 100 year fluvial flood level plus a minimum of 10% increase in rainfall intensity plus 300mm freeboard.
  - iii) Designing basements and basement access to prevent ingress of water from groundwater sources or pluvial or fluvial flood events. Reference should be made to the DCC policy on basements as set out in the GDSDS Regional Drainage policy – Volume 6 – Basements.



Appendix 1

Sequential Approach & Justification Test

The key principles of the risk based sequential approach (see Figure 1 below) is managing flood risk in the preparation of plans as set out in Chapter 3 of the DEHLG Flood Guidelines and these principles should be followed in the Naas Road LAP .

This is the key tool in the decision making process of preparing plans to ensure that development is first and foremost directed towards land that is at low risk of flooding. See primary FRA maps at

[www.cfram.ie/pfra/interactive-mapping](http://www.cfram.ie/pfra/interactive-mapping)

This approach makes use of existing flood risk assessments (FRA's) and of prior identification of flood zones for rivers, coastal flooding and pluvial flooding and classification of the vulnerability of flooding of different types of development.

The sequential approach in terms of flood risk is based on the following principles:

- The primary objective of the sequential approach is that development is primarily directed towards land that is at low risk of flooding (AVOID).
- The next stage is to ensure that the type of development proposed is not especially vulnerable to the adverse impacts of flooding (SUBSTITUTION).
- The Justification Test is designed to rigorously assess the appropriateness, or otherwise, of particular developments that, for various reasons, are being considered in areas of moderate or high flood risk (JUSTIFICATION).
- The test is comprised of two processes, namely The Plan-Making Justification Test and The Development Management Justification Test.

In summary, the planning implications for each of the flood zones are:

Zone A - High probability of flooding. Most types of development would be considered inappropriate in this zone. Development in this zone should be avoided and/or only considered in exceptional circumstances, such as in city and town centres, or in the case of essential infrastructure that cannot be located elsewhere, and where the Justification Test has been applied. Only water-compatible development, such as docks and marinas, dockside activities that require a waterside location, amenity open space, outdoor sports and recreation, would be considered appropriate in this zone.

Zone B - Moderate probability of flooding. Highly vulnerable development, such as hospitals, residential care homes, Garda, fire and ambulance stations, dwelling houses and primary strategic transport and utilities infrastructure, would generally be considered inappropriate in this zone, unless the requirements of the Justification Test can be met.

Less vulnerable development, such as retail, commercial and industrial uses, sites used for short-let for caravans and camping and secondary strategic transport and utilities infrastructure, and water compatible development might be considered appropriate in this zone.

In general however, less vulnerable development should only be considered in this zone if adequate lands or sites are not available in Zone C and subject to a flood risk assessment to the appropriate level of detail to demonstrate that flood risk to and from the development can or will adequately be managed.

Zone C - Low probability of flooding. Development in this zone is appropriate from a flood risk perspective (subject to assessment of flood hazard from sources other than rivers and the coast) but would need to meet the normal range of other proper planning and sustainable development considerations.

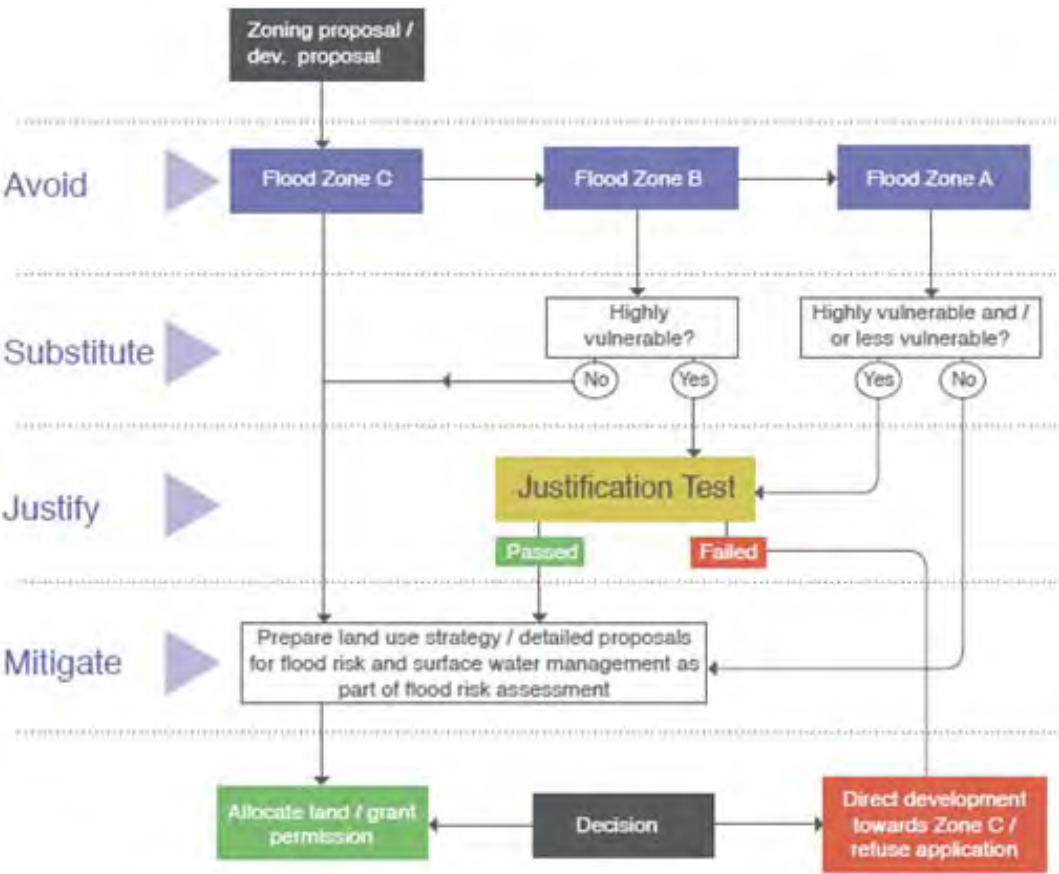


Table 1 classifies the vulnerability of different types of development while

Table 2 identifies the appropriateness of development belonging to each vulnerability class within each of the flood zones as well as identifying what instances in which the Justification Test should be undertaken.

Inappropriate development that does not meet the criteria of the Justification Test should not be considered at the plan-making stage or approved within the development management process



Table 1 Classification of vulnerability of different types of development

| Vulnerability Class                                             | Land Uses and Types of Development which include:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|-----------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Highly Vulnerble Development Including essential infrastructure | Garda, ambulance and fire stations and command centres required to be operational during flooding;<br>Hospitals;Emergency access and egress points;<br>Schools;<br>Dwelling houses, student halls of residence and hostels;<br>Residential institutions such as residential care homes, children's homes and social services homes;<br>Caravans and mobile home parks;<br>Dwelling houses designed, constructed or adapted for the elderly or, other people with impaired mobility; and<br>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 sites, IPPC sites, etc.) in the event of flooding. |
| Less Vulnerable Development                                     | Buildings used for: retail, leisure, warehousing, commercial, industrial and non-residential institutions;<br>Land and buildings used for holiday or short-let caravans and camping, subject to specific warning and evacuation plans;<br>Land and buildings used for agriculture and forestry;<br>Waste treatment (except landfill and hazardous waste);<br>Mineral working and processing; and<br>Local transport infrastructure.                                                                                                                                                                                                                                                                                                                                                |
| Water Compatible Development                                    | Flood control infrastructure;<br>Docks, marinas and wharves;<br>Navigation facilities;<br>Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location;<br>Water-based recreation and tourism (excluding sleeping accommodation);<br>Lifeguard and coastguard stations;<br>Amenity open space, outdoor sports and recreation and essential facilities such as changing rooms; and<br>Essential ancillary sleeping or residential accommodation for staff required in this category (subject to a specific warning and evacuation plan) by uses in this category (subject to a specific warning and evacuation plan).                                                                              |
|                                                                 | <ul style="list-style-type: none"><li>Uses not listed here should be considered on their own merits.</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

Table 2 – matrix of vulnerability versus flood zone to illustrate appropriate development and that required to meet the Justification Test

|                                                                    | Flood Zone A       | Flood Zone B       | Flood Zone C |
|--------------------------------------------------------------------|--------------------|--------------------|--------------|
| Highly Vulnerable Development (including essential infrastructure) | Justification Test | Justification Test | Appropriate  |
| Less Vulnerable Development                                        | Justification Test | Appropriate        | Appropriate  |
| Water Compatible Development                                       | Appropriate        | Appropriate        | Appropriate  |



## The Plan-Making Justification Test

Where, as part of the preparation and adoption of a development / local area plan, a planning authority is considering the future development of areas in an urban settlement that are at moderate or high risk of flooding, for uses or development vulnerable to flooding that would generally be inappropriate as set out in the Guidelines, all of the criteria listed below, as stated in the Guidelines, must be satisfied.

This is referred to as the Justification Test for Development Plans.

(I) The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act 2000, as amended.

(II) The zoning or designation of the lands for the particular use or development type is required to achieve the proper and sustainable planning of the urban settlement and in particular:

(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;

(ii) Comprises significant previously developed and/or under-utilised lands;

(iii) Is within or adjoining the core of an established or designated urban settlement;

(iv) Will be essential in achieving compact or sustainable urban growth;

(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.

(III) A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.

MITIGATION is the process where the flood risk is reduced to acceptable levels by means of land use strategies or by means of detailed proposals for the management of flood risk and surface water, all as addressed in the Flood Risk Assessment.

The decision to PROCEED should only be taken after the Justification Test has been passed.

## Development Management Justification Test

This is used at the planning application stage where it is intended to develop land at moderate or high risk of flooding for uses vulnerable to flooding that would generally be inappropriate for that land. (as set out in Table 1 ),The Planning Authority must be satisfied that the development satisfies all the criteria of the Justification Test as it applies to development management .

When considering proposals for development which may be vulnerable to flooding, and that would generally be inappropriate ( as set out in Table 2 above) , the following criteria must be satisfied:

1. The subject lands have been zoned or otherwise designated for the particular use or form of development in an operative development plan, which has been adopted or varied taking account of these Guidelines.
2. The proposal has been subject to an appropriate flood risk assessment that demonstrates
  - (i) The development proposed will not increase flood risk elsewhere and, if practicable, will reduce overall flood risk;
  - (ii) The development proposed includes measures to minimise flood risk to people, property, the economy and the environment as far as reasonably possible;
  - (iii) The development proposed includes measures to ensure that residual risks to the area and/or development can be managed to an acceptable level as regards the adequacy of existing flood protection measures or the design, implementation and funding of any future flood risk management measures and provisions for emergency services access, and
  - (iv) The development proposed addresses the above in a manner that is also compatible with the achievement of wider planning objectives in relation to development of good urban design and vibrant and active streetscapes,

The acceptability or otherwise of levels of residual risk should be made with consideration of the type and foreseen use of the development and the local development context.

Note: See section 5.27 (The Planning System and Flood Risk Management Guidelines for Planning Authorities, 2009) in relation to major development on zoned lands where sequential approach has not been applied in the operative development plan.

Refer to section 5.26 (The Planning System and Flood Risk Management Guidelines for Planning Authorities, 2009) in relation to minor and infill developments.



## Appendix 2: Taking in Charge Standards, Open Space Design Guidance and SuDS Guidance

### Section 1: Guidelines for Open Space Development and Taking In Charge

How open space areas are managed and maintained after their provision is an important consideration at the design stage, particularly to ensure that public open space can be taken into charge by Dublin City Council successfully.

It is also important that topsoil is recognised as an important on site resource for biodiversity and landscaping. Considering the extent of lands still to be completed for development in the LAP area, a successful open space strategy is dependant on high quality soil being retained and appropriately stored on site for future landscaping purposes.

The Culture, Recreation and Amenity Department of Dublin City Council have produced a set of guidelines called "Guidelines for Open Space Development and Taking in Charge" which provide important information for landscape designers of new public open space.

Some of the important guidance provided, which will benefit open space provision in the LAP area, includes the following:

- Tree surveys should be carried out by a qualified Arboriculturist.
- Landscape works are to be completed before occupation of the development or initial phase of development.
- A detailed survey should be made of existing hedgerows, trees and other natural site characteristics to evaluate their potential for protection and augmentation within landscape proposals.
- Based on the survey information, works proposed to existing hedgerows and trees must be agreed with DCC. Vegetation supporting nests may only be altered between the period of 1<sup>st</sup> September to the 1<sup>st</sup> February each year in the interest of protecting wildlife.
- A two stage consultation with the Parks and Landscape Devision is advised. The first should set out the existing site survey and analysis with the concept plan prior to an application being lodged. The second consultation should include the detailed design (at planning stage).
- For any public open space/streetscape to be taken in charge by the Dublin City Council, landscape submissions shall consider:
  - Landscape plan at an approved scale.
  - Location plan with areas intended to be taken in charge.
  - Sections / elevations.

- Images
- Specialist opinions.
- Landscape maintenance specification.
- The principle of SuDS should be adopted in the treatment of surface water drainage.
- In general the developer will be responsible for the maintenance of the public open space for an 18 month period after the completion of works. At the end of the maintenance period Dublin City Council and landscape consultant will inspect the open space prior to taking in charge.
- As a general rule, areas designated for public open space purposes should be fenced off prior to the commencement of any development works on site and should not be used as site compounds etc.
- All development works should ideally be carried out during summer months under the supervision of the landscape consultant. In general all gradients in grassed areas shall not be greater than 1:4.
- Any excess top soil to be removed from the site is subject to agreement with the Dublin City Council. The developer shall store any top soil to be used in future public open space in accordance with the requirements of the Council. Existing topsoil is to be viewed as a resource to be valued and managed in accordance with Dublin City Council's Biodiversity Action Plan 2008 - 2012.
- Dublin City Council may require testing of material to be used as topsoil on any future public open spaces, at the cost to the developer, to ensure quality control. Any importation of topsoil will be subject to national legislation and Dublin City Council shall be informed of the source of any imported material.
- All areas to be grassed on public open space should be provided with an adequate layer of good quality top soil. A minimum depth of 150mm freely draining soil is required. The finished level of the topsoil shall remain 50mm above adjoining roads and footpaths to allow for settlement.
- All areas to be planted for trees and shrubs shall be provided with a minimum of 300mm depth of topsoil with a minimum depth of 300mm subsoil underneath.
- For street trees, a 600mm depth of topsoil, at a radius of 1m from the base of the tree, should be provided at all street tree planting positions. Street trees should not be planted under or within three metres of street lights.

### Section 2: Private and Communal Open Space Design Guidance

Maximising the amenity value of homes and residential schemes is important for quality of life of the residents and in particular to encourage longer term residency. Attracting long term residents to develop the neighbourhood and a strong community, particularly in a new developing area such as the Naas Road Lands, was noted in the public observations as a target for this LAP. Providing good quality amenities for occupants is an important design consideration which will help to encourage a longer term resident base.

The Dublin City Development Plan 2011-2017 provides important guidance for the design of homes and Section 17.9 in particular sets out important quality standards which must be met. Of note for residential developments are the following:

#### For Apartments

- Where balconies are provided, they should be functional, screened, have a sunny aspect, be wheelchair accessible and allow table and chair seating. The primary balcony should be located adjacent to the main living area.
- Communal open space may include sheltered roof gardens and communal landscaped areas at ground or podium level accessible to all the units it serves.
- The design of communal open space should take into account good passive surveillance, children's play, wheelchair access, good sunlight penetration, appropriate maintenance and management arrangements (including factors of storage and water supply).
- Outside the city centre area, combined private and communal open space provision shall be 12-15 sq.m per bedspace at a minimum.

#### For Houses

- A standard of 15 sq.m private open space per bedspace will normally be applied.
- At the rear of dwellings, there should be adequate separation (traditionally 22 metres between two storey houses with first floor opposing windows). This distance can be shorter if the design is such that the privacy of adjacent occupiers is preserved.
- The provision of defensible space behind the public footpath by means of a planting strip is important for housing units that address a street with own door access and ground floor windows. In particular where on street parking is provided, a landscaped strip of 2 metres minimum depth should be provided.
- Rear gardens and private garden space should be screened from public areas, provide safe and secure play areas, be overlooked from a living or kitchen area, have robust boundaries and should not back onto roads or public open spaces.



### Playgrounds and Children's Play Spaces

Incorporating opportunities for children's play and activity, inclusive of young children and teenagers, is an important consideration for open space design. In particular a network and sequence of different open space character areas can provide opportunities to provide amenities for different age groups. Providing safe routes between different character amenity areas can be very beneficial to encourage active use.

While all open space areas should have flexible design principles to encourage recreation for all ages, making sure that children and teenagers have access to recreational facilities is important for the development of the community, especially in a new developing community.

Section 17.16 of the Dublin City Development Plan 2011-2017 provides some valuable guidance on playgrounds and play spaces which will be valuable for designers creating open space within the LAP area.

Some guiding principles include:

- Play spaces for small children (under 5s) should be close to residential dwellings, safe from traffic, overlooked with housing and frequented streets and footpaths, have both sunny and shaded parts, and be equipped with both natural play elements and play equipment.
- Recreation facilities for older children and teenagers should take into account multi use game areas, teenage shelters, skate parks, meeting places (seating) etc. Such locations should be well positioned within the neighbourhood with good visual prominence and connections to the residential area.

Dublin City Council are creating a Play Plan and accompanying Play Checklist which will provide valuable guidance for designers.

### Section 3.0 SuDS Design Guidance

The following general guidance is provided to guide future developments within the LAP area:

#### Domestic Designs

SuDS measures can have effective outcomes on management of surface water drainage if implemented as part of domestic design. The design of individual houses should take into consideration design features including:

- Roof drainage could incorporate green roofs or drain to a soakaway, permeable paving area or mini detention basin.
- Permeable materials (especially for driveways)
- Cost savings could be made if surface water is recycled for domestic use.

### Commercial/Office/Apartment Blocks

Larger schemes will have optimal opportunities to incorporate SuDS measures, particularly where they can be incorporated as part of the site masterplan features. Using the scale of buildings, (roofscapes in particular) can provide good opportunities. Some design considerations would include:

- A 3 stage treatment train, or if there are space restrictions a 2 stage treatment train, would provide an optimal solution.
- Consider a green roof on all or part of the development.
- Consider rainwater harvesting as one stage in the process.

### Large Scale Housing Development

The co-ordination of SuDS design measures into an overall integrated system at the masterplanning stage is important and an opportunity to benefit both the scheme and the environment. In particular, the planning and design of roads, open space areas and cumulative impact of roof drainage can be envisaged and co-ordinated.

Some design considerations will include:

- A 3 stage treatment train is optional.
- Roofs and roads could be drained by filter drains, soakaways, swales and detention basins.
- Use of green space and landscaping so that usable amenity space and a drainage function can co-exist.

*Some images of SuDS incorporated into residential developments (examples from Finland)*

