

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

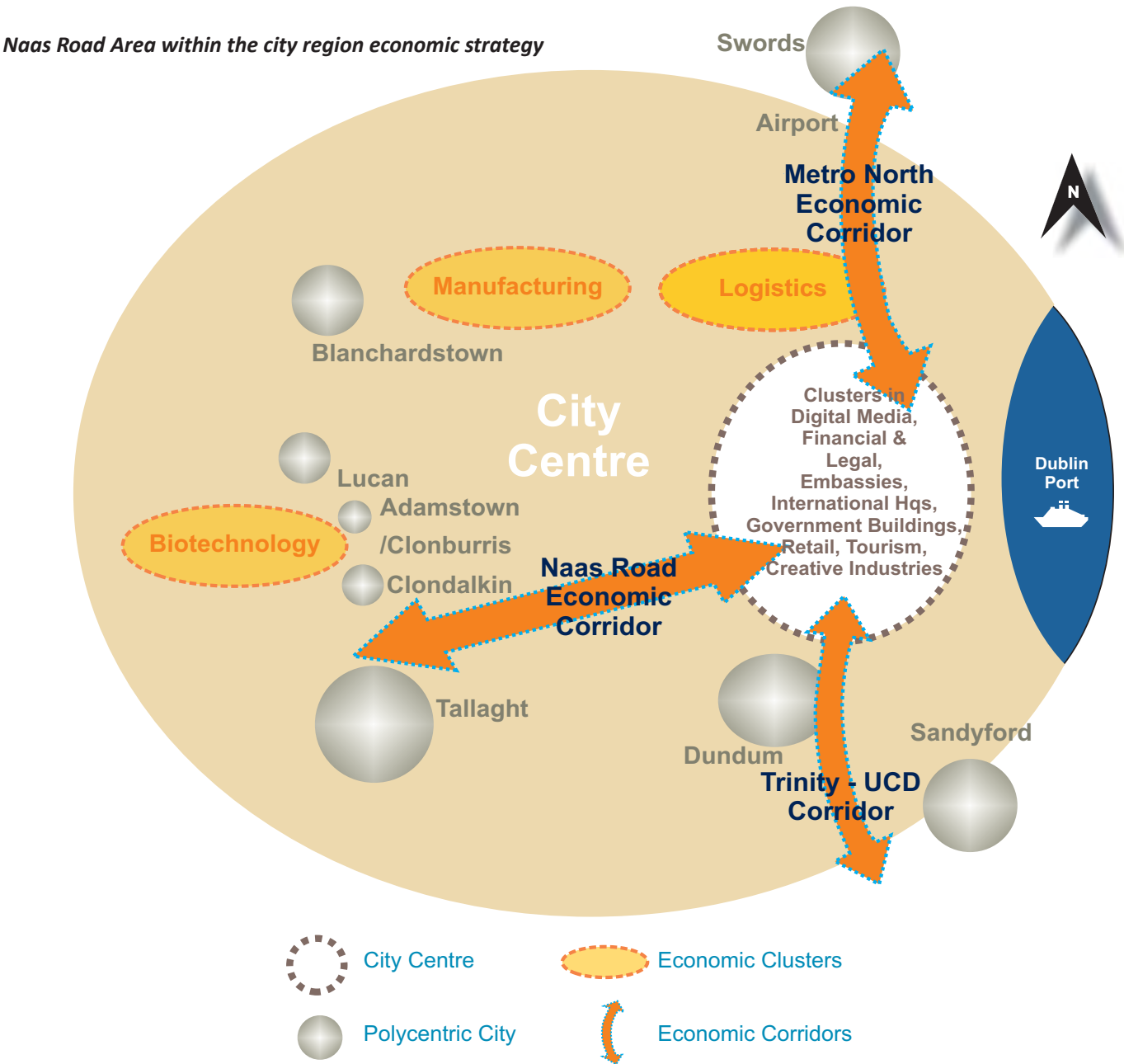
The Economic Development Action Plan for the Dublin City Region was launched in 2010 .Three economic corridors have been identified in this document, including the Naas Road – Rail Corridor. This corridor spans both Dublin City Council’s and South Dublin County Council’s administrative areas, running 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.

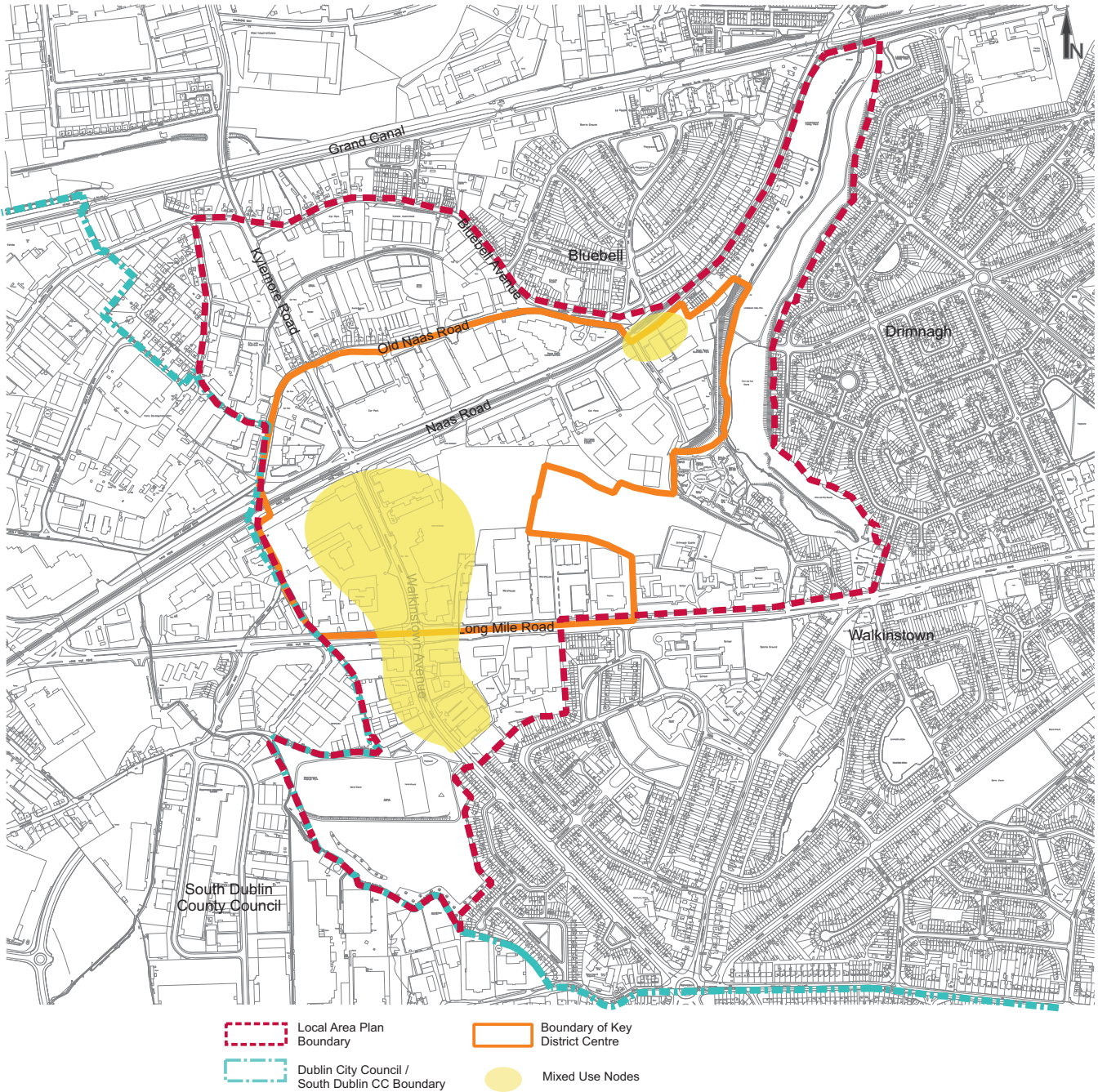
Any proposed development will have to clearly demonstrate that it will not hinder or detract from the provision and development of an integrated and compact retail core in this plan area. Within the lifetime of the plan, delivery of floorspace will be such that no single use is overly-dominant such that 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

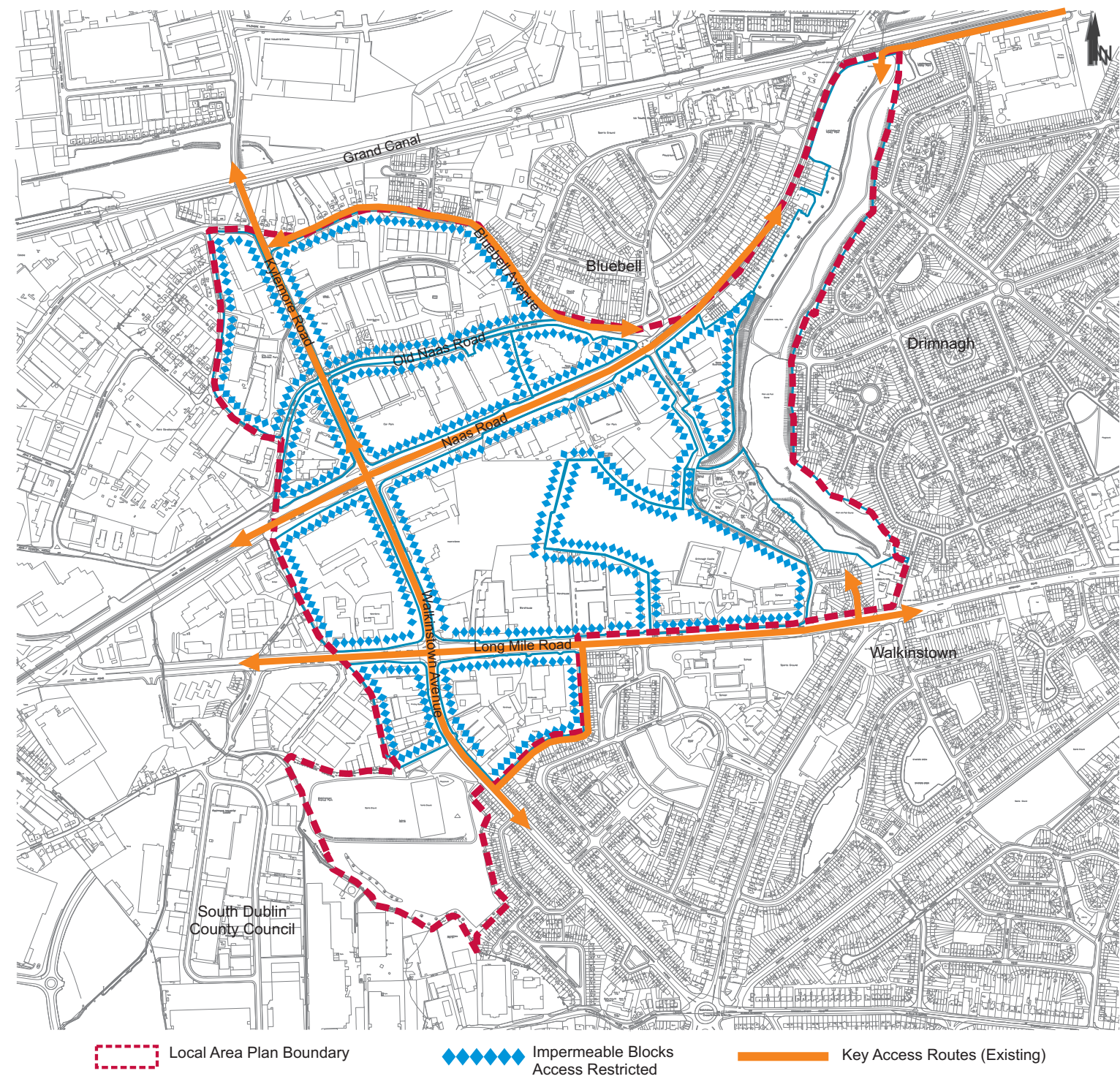
The Naas Road Plan area both benefits and suffers from its location on the major traffic artery of the Naas Road which carries heavy traffic volumes, a Luas line and a QBC. The road network serving the area is at capacity for private vehicles and as such, a major objective of the plan is to encourage 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.

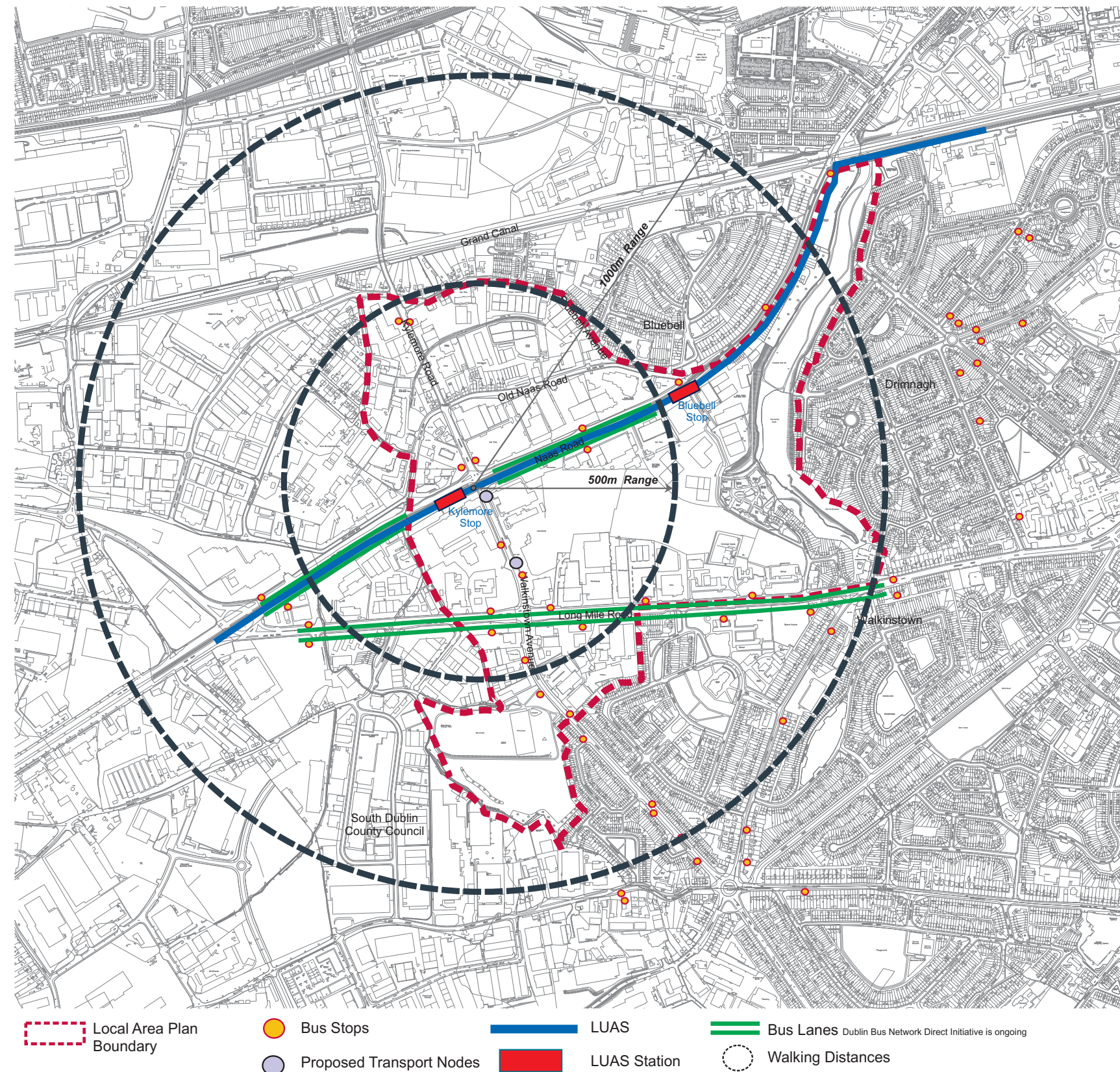
4.4.2 Overall Approach

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

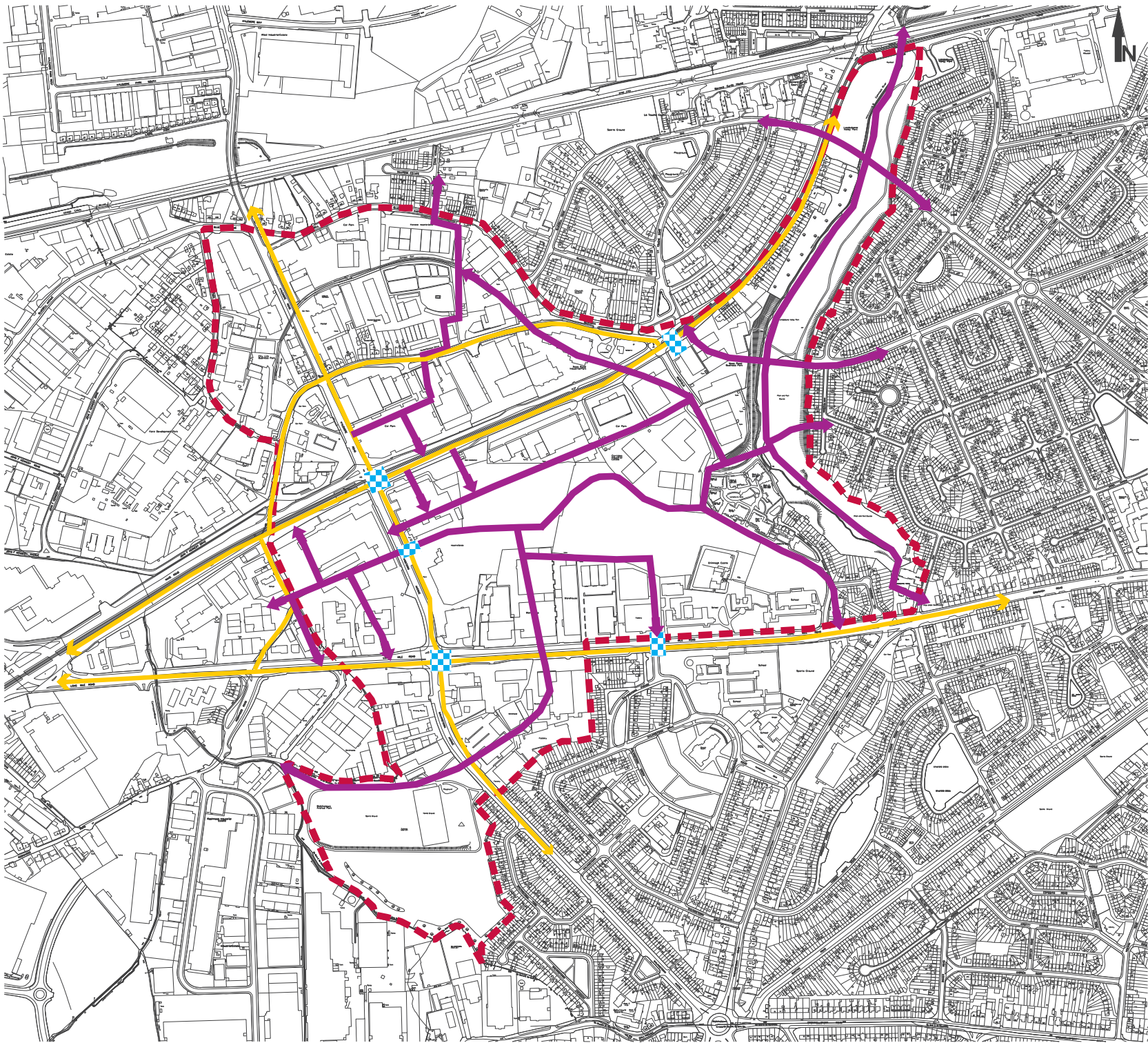
The Naas Road area immediately adjoins Drimnagh to the east and there is significant potential to improve connectivity between to the two areas. This potential for connectivity has been identified in the Drimnagh Integrated Area Plan and more recently in the Drimnagh Smarter Travel Area Plan.





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

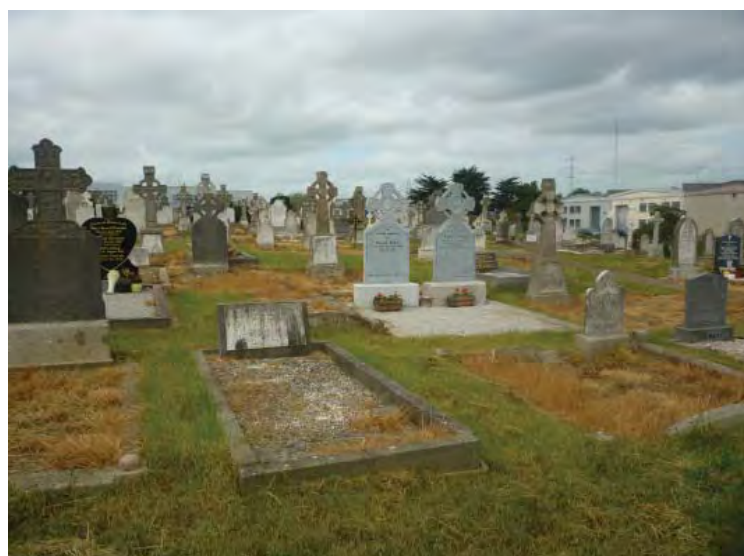
The phasing, scale and layout of the new development may be influenced by the provision and location of service infrastructure. Comprehensive and complete redevelopment of key sites will be dependent in some cases on undergrounding of electricity wires and removal of pylons, whilst other areas will need 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

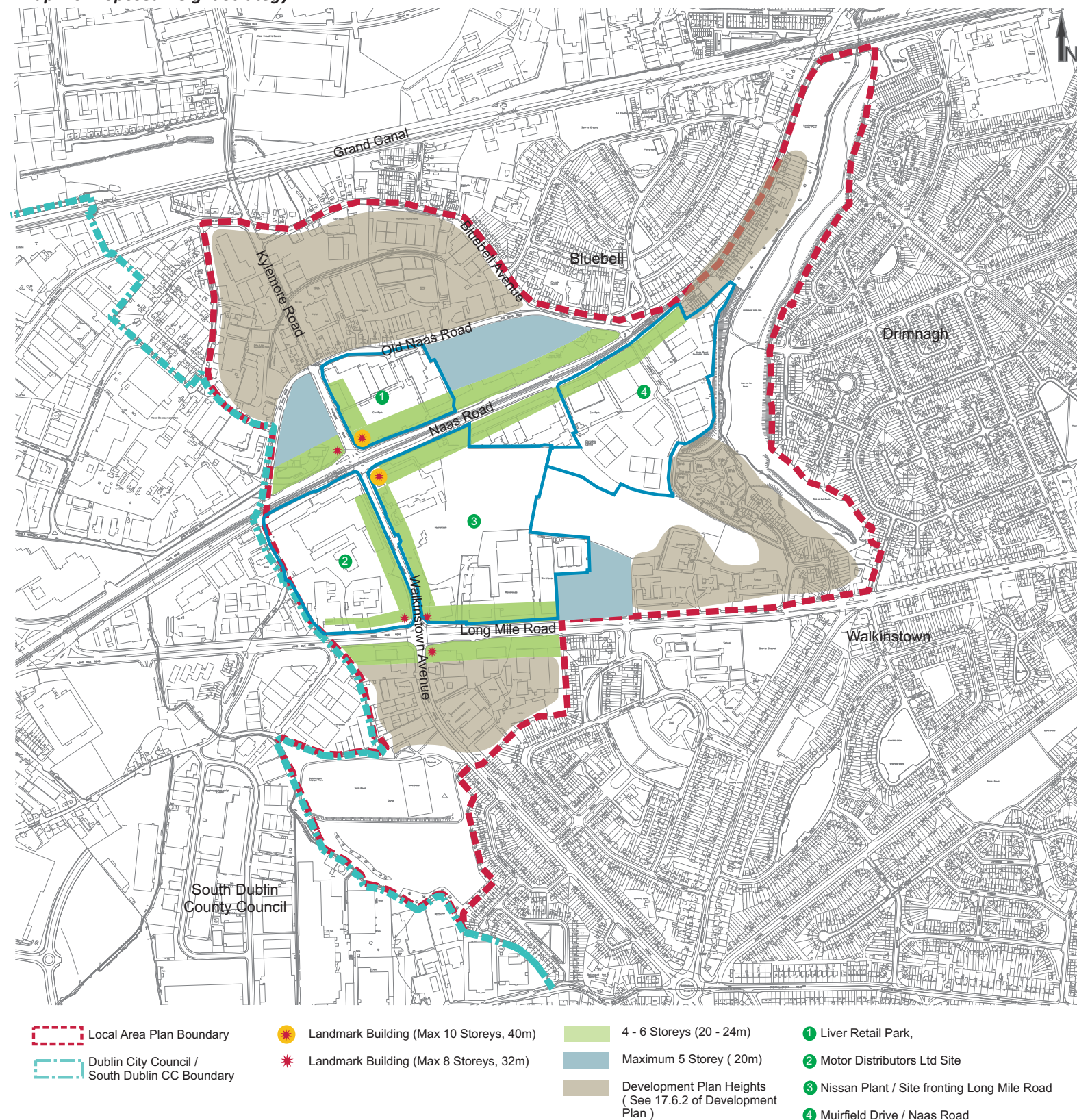
- Development immediately adjoining existing residential areas should not exceed two storeys above the height of existing housing.
- Seveso restrictions may apply with regard to allowable land use and intensity of development.
- Restrictions associated with utilities and piped services - including electricity 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. (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.



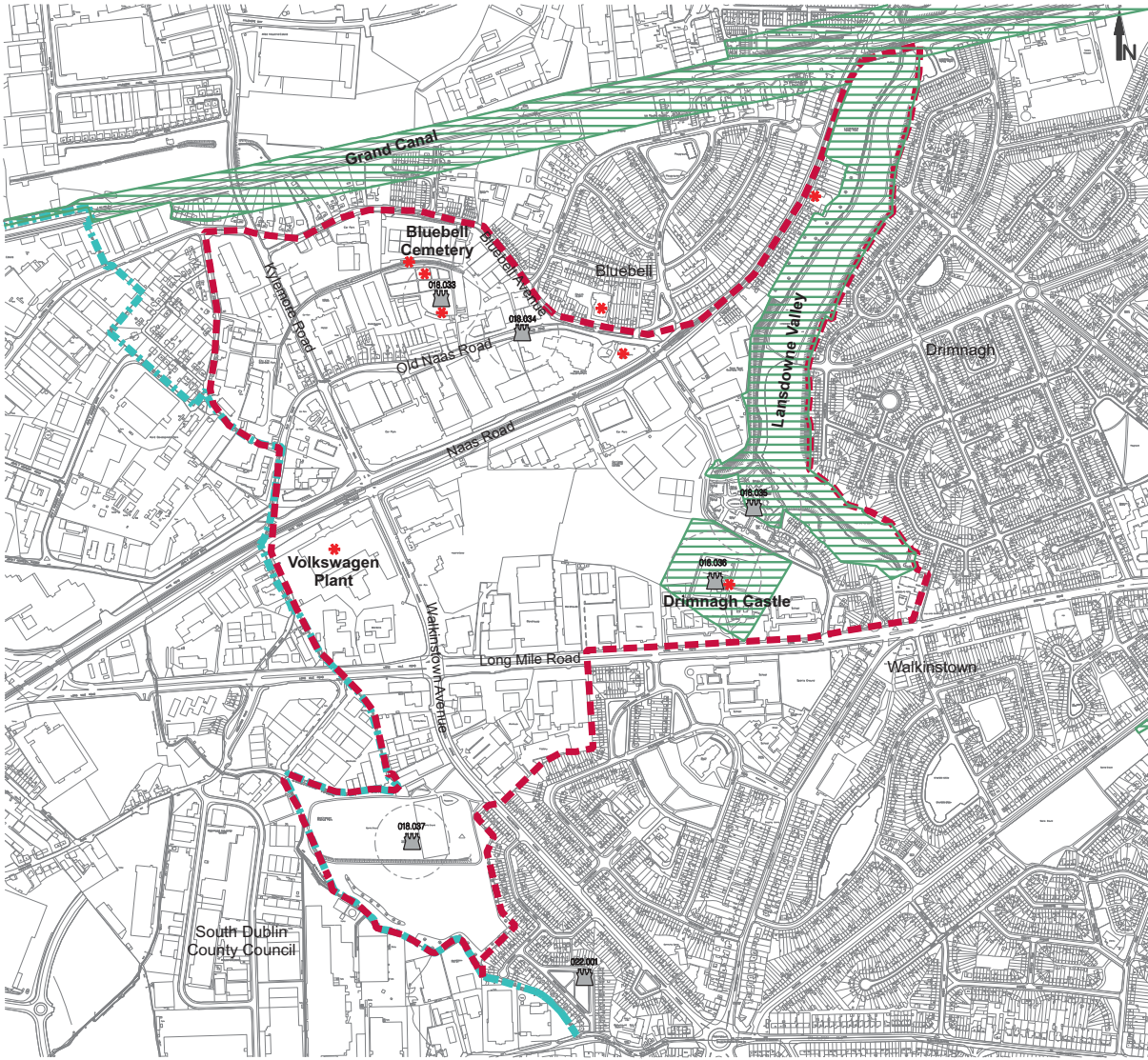
The built heritage of this area is little known within the wider city context and this is partly because the gradual development of industrial lands has modified their original context and setting. This LAP affords an opportunity to utilise heritage assets in line with various development plan guidelines, 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



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)

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 19th century. The building is a good example of mid 20th 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 (13th 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 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

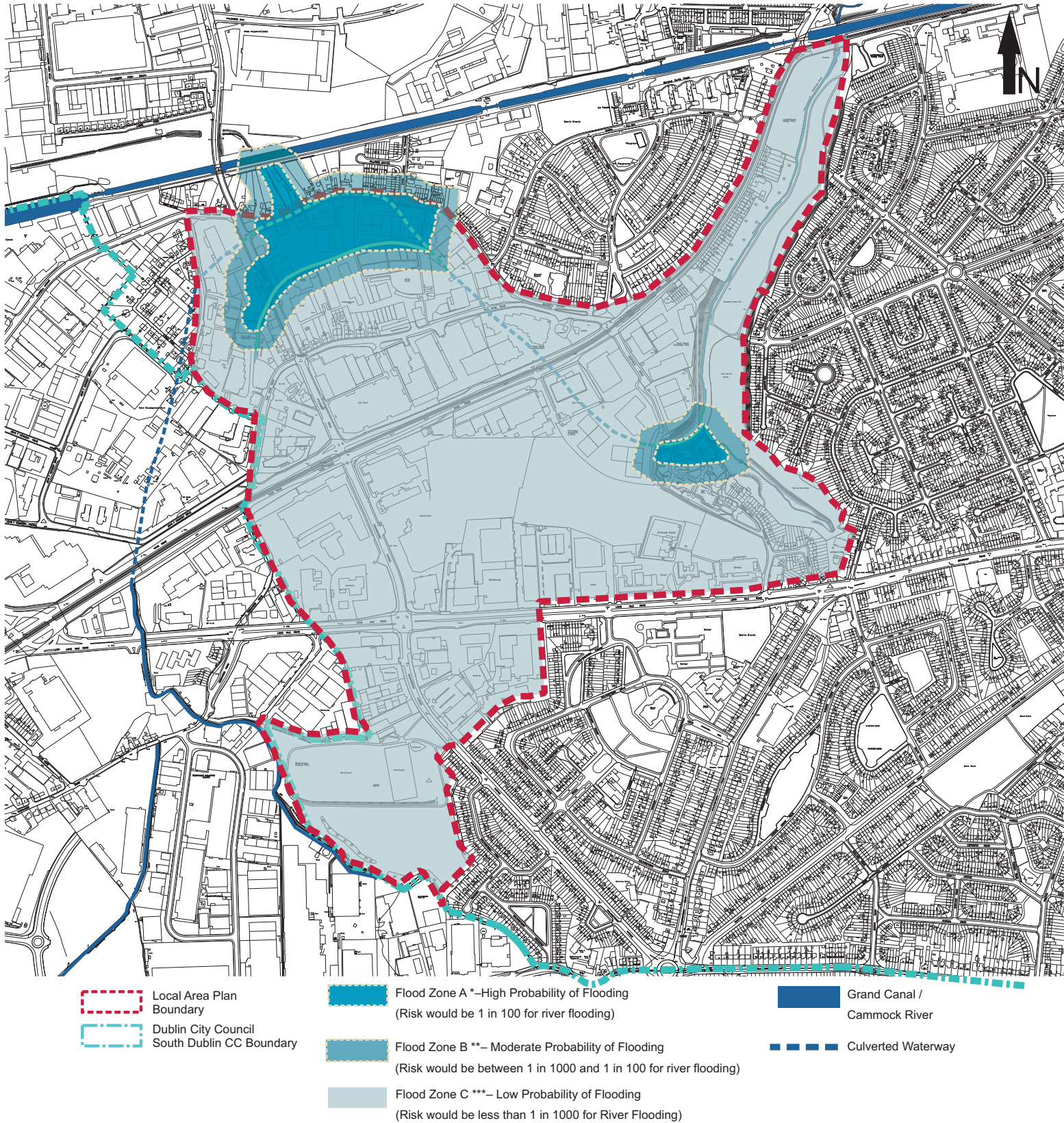
Accompanying this Local Area Plan is a flood risk assessment (see Appendix 1), which includes a number of measures necessary to ensure assessment of flood risk is incorporated into the LAP. Two main types of flood risk are identified in the Naas Road lands namely fluvial flooding (rivers), and pluvial (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.

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

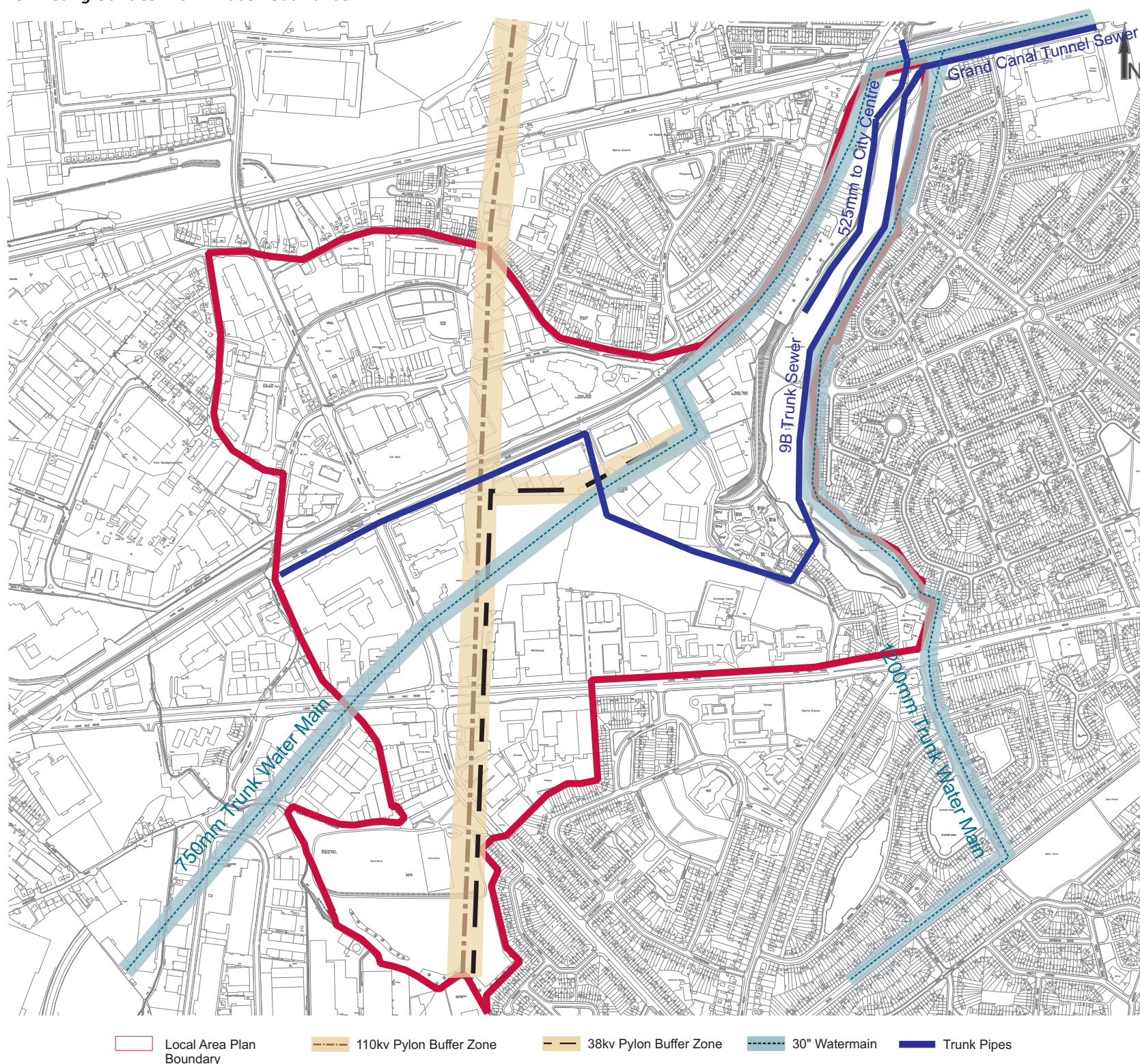
The pipeline connection for the Naas Road Area was sized to accommodate growth in gas demand from local business and residential users over a ten year period. There is adequate capacity to supply gas to additional local business and residential users with the result that Bord Gáis Networks is not planning 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

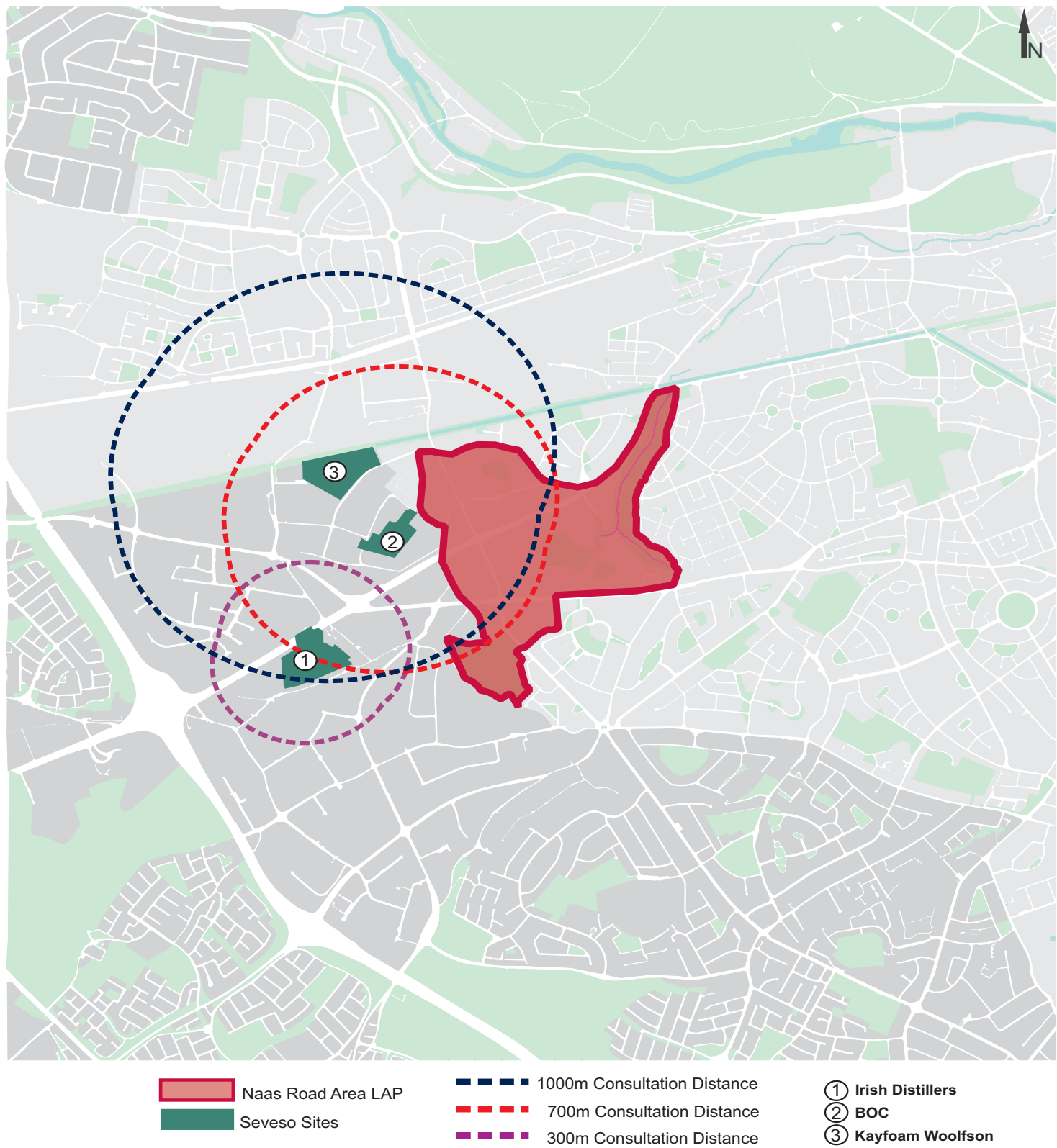
There are three Seveso establishments in the vicinity of the LAP area. In preparing a local area plan, it is a statutory requirement to consult the Health and Safety Authority (HSA) with regard to such establishments. The HSA, as the competent authority will then advise as to the appropriateness of the 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.