

**To the Chairperson and Members
of the Central Area Committee**

**Report of the
Assistant Chief Executive**
Planning, Property and Economic
Development Department



Comhairle Cathrach
Bhaile Átha Cliath
Dublin City Council

**DRAFT BAILE BOGÁIN MASTERPLAN
CHIEF EXECUTIVE'S REPORT ON THE SUBMISSIONS RECEIVED DURING THE PUBLIC
CONSULTATION PROCESS FOR THE DRAFT MASTERPLAN**

June 2025

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Executive Summary

Introduction

Dublin City Council (DCC) has prepared a non-statutory draft Masterplan for lands located at Glasnevin that include 45.5 hectares of lands zoned Z6 (Employment/Enterprise) at Dublin Industrial Estate and environs pursuant to Objective CS01 of the Dublin City Development Plan 2022-2028 (the Development Plan). The working title given to this Masterplan is Baile Bogáin (Ballyboggan), derived from the historic townland of the area.

Non-statutory public consultation took place from 14th April 2025 to 12th May 2025 (both dates inclusive). The purpose of this report is to briefly summarise the **issues** raised in the submissions received by DCC during the consultation period and present the Chief Executive's response and recommendation.

Submissions received

A total of 144 submissions were received by DCC during the consultation period. Each submission was carefully reviewed by DCC and the issues raised therein categorised and considered. Those issues raised by statutory or public bodies are summarised individually in section 2.2, while all other submissions are summarised in section 2.3 grouped in accordance with each chapter of the draft Masterplan and under various topics/themes.

6% of submissions received were from statutory or public bodies. 72% were from residents or members of the public, with 14% from or on behalf of landowners, businesses or commercial interests. 7% were received from community and sports groups or organisations and 1% from elected representatives.

In general, submissions received related to strategic matters and issues that aligned with the various chapters in the draft Masterplan. Several submissions related to area specific or site matters to include property/land acquisition, business operations, built form, open space and local impacts. The most common issues raised by the submissions received related to Chapter 3: Urban Structure and Chapter 4: Urban Form and Design. These matters related to development capacity, residential density and building height.

Summary of responses to issues raised

The summary below is not exhaustive or detailed and is intended to provide a general overview of some of the substantive issues raised during the consultation period and the Chief Executive's response and recommendation. Please refer to sections 2.2 and 2.3 of this report for a comprehensive summary and response to the issues raised.

Naming of Masterplan and future development

Several submissions expressed strong views regarding the naming of this project and future neighbourhood. Some requested alternative names, citing the historical significance of the physicist and mathematician Sir William Rowan Hamilton who first wrote down the formula for quaternions on 16th October 1843 at Broombridge. The Chief Executive welcomes the strong engagement and interest from members of the public and interested parties. Chapter 1 of the draft Masterplan states that Baile Bogáin (Ballyboggan) is a 'working title'. It is emphasised that this name is derived from the historic townland, which aligns with the place naming protocols of DCC. However, in response to the submissions and interest received, and subject to the approval of the elected members, the Chief Executive is happy to consider alternative naming conventions and therefore recommends that this project be re-named the **Broombridge-Hamilton Masterplan**. It is hoped that this will address confusion regarding location and will also align with the existing public transport interchange. It is emphasised that this does not necessarily prohibit future names for this new neighbourhood, in accordance with Council protocol.

Residential development capacity and density

The Chief Executive acknowledges that there was confusion regarding the area of land subject to land use zoning Z6 (Employment/Enterprise). The majority of submissions received incorrectly assumed this to be 77 hectares. As a result, many submissions suggested that the Masterplan contravened the Sustainable Residential Development and Compact Settlement Guidelines and the Dublin City Development Plan 2022-2028 regarding net residential densities, with some seeking clarity. Many submissions mistakenly assumed a gross density.

The Chief Executive clarifies that the development capacity set out relates to **45.5 hectares** of Z6 industrial lands subject to the urban framework. The calculated net residential area of this land is **28 hectares**. The net residential area excludes non-residential uses such as the reserved school site, parks, commercial and community uses. This provides an anticipated yield of between **6,000 – 7,000** homes that fully complies with national and Development Plan policy, with an anticipated net residential density of individual development proposals in the range of **200-250 units per hectare (uph)**. This is the upper range of the density ranges prescribed having regard to proximity to existing and proposed public transportation. While there is a presumption against densities exceeding 300 uph, individual proposals between 250 uph and 300 uph may be considered as part of comprehensive design solutions. Furthermore, infill opportunities on existing residential zoned land, which includes lands along Bannow Road, could yield between 1,000 – 1,500 homes (if redeveloped). Therefore, the overall lands could support 8,500 homes. No material changes are proposed. Clarifying text will be provided in the Masterplan to address this matter.

Building heights

It is acknowledged that building heights and density are frequently considered a single matter in many submissions. It should be noted that while related, they are not the same. However, it is accepted in this context that concerns relating to building heights are a result of confusion relating to density/development capacity, as outlined above.

In the first instance, the Chief Executive emphasises that **the built form illustrated in the draft Masterplan achieves the net residential density, development capacity and land use mix set out**, as prescribed by national and Development Plan policy. It is also stressed that the building heights set out in the draft Masterplan are **baseline**, with variety relating to block size, land use mix, typology and tenure, as set out in the Masterplan. With the exception of a small number of locations identified for reduced height, the general baseline heights facilitated start at **3-4 storeys** increasing to **6-8 storeys**, which is in keeping with best practice and Development Plan policy.

The Masterplan sits within the operational Dublin City Development Plan. The Masterplan and the Development Plan, both provide for variety and flexibility at the level of an urban block as part of detailed design proposals. Notwithstanding this, it is accepted that this caused confusion. In order to clarify this position and emphasise the scale and intensity of development required on these lands to support sustainable consolidation, it is considered appropriate to **simplify the height strategy**, by providing fewer and broader height ranges, with refined flexibility at the level of the urban block to respond to detailed design matters such as topography, aspect, scale and local impact.

Proposed Parks

Compact growth and brownfield urban regeneration proximate to existing and proposed public transportation presumes the delivery of higher residential densities. This necessitates the need for public open space and enhanced public realm to support future communities and great successful places. Dublin City Council's Parks, Biodiversity and Landscape Services Department advised on the future requirements for open space in the Masterplan,

which included two Grade 1 Community Parks, along with a linear park along the Royal Canal. This requirement considered the nature of the anticipated development and the expected population. These parks have specific requirements, including land take, to cater for a range of uses and design responses, in addition to management and maintenance requirements. While counter proposals for smaller networks of open spaces are noted, and significant reductions to the proposed Royal Canal Linear Park, based on the professional advice of both the Parks and Planning Departments, the Chief Executive does not consider that these proposals constitute a realistic alternative and would not be in keeping with good planning and design.

Concerns regarding uncertainty and lack of clarity regarding the anticipated land take and delivery of the proposed Royal Canal Linear Park are noted. The Urban Framework presented in this Masterplan does not constitute a detailed design response. Further assessments and detailed design work will be required to refine specific land takes. Clarifying text will be provided in the Masterplan regarding expectations to assist applicants with future proposals, while safeguarding future amenity. Subject to the implementation option pursued, and satisfaction of Dublin City Council's Parks, Biodiversity and Landscape Services Department, delivery may be addressed in a phased manner as part of individual development proposals and based on site specific circumstances.

Implementation

Several landowners and businesses requested changes to Specific Design Objective 8, which requires applicants to prepare a more detailed parcel level masterplan as part of detailed design proposals. The draft Baile Bogáin Masterplan is a policy document which sets out the urban structure, urban form and land uses to facilitate development opportunities within the lands over an extended period of time. It does not represent a detailed design response to individual development parcels. The preparation of a parcel level masterplan at planning application stage is particularly important on brownfield industrial lands, where some existing uses are still operating. This will ensure that individual sites and proposals can proceed in an appropriate manner. It also ensures that a coordinated approach to the delivery of public open space, surface water drainage, community and social infrastructure occurs. Several businesses and community initiatives have expressed a desire to remain in the area and be involved in future parcel level masterplans. In recognition of this, Design Objective 8 will be amended to ensure that business owners, community and cultural operators are also involved in consultation with landowners or applicants (see Amendment 19).

Next Steps

Subject to the approval of the Elected Members, the Masterplan will be incorporated into the Development Plan by way of variation. This proposed variation will change the land use zoning of the 45.5 hectares of Z6 (Employment/Enterprise) lands to Z14 (Strategic Development and Regeneration Area (SDRA)) and will incorporate the Masterplan by way of designating a new SDRA. At this stage the Masterplan will become statutory, as part of the Dublin City Development Plan 2022-2028.

1.0 Introduction

Dublin City Council (DCC) has prepared a non-statutory draft Masterplan for lands located at Glasnevin that include 45.5 hectares of lands zoned Z6 (Employment/Enterprise) at Dublin Industrial Estate and environs pursuant to Objective CSO1 of the Dublin City Development Plan 2022-2028 (the Development Plan). The working title given to this Masterplan is Baile Bogáin (Ballyboggan), derived from the historic townland of the area.

While Objective CSO1 envisaged a statutory local plan, during the background and pre-draft stages of this process, the Government published a new Planning and Development Bill which proposed the phasing out of Local Area Plans (LAPs) and their replacement with a new suite of local plans. While the Planning and Development Act 2024 was enacted in October 2024, the commencement of this act will be phased.

This non-statutory Masterplan has been prepared to facilitate the compact and sustainable mixed-use regeneration and redevelopment of the area, supported by high-quality public transport in accordance with the Core Strategy of the Development Plan. In order to support and capitalise on significant state investment in public transportation and active travel, to include DART+ West, Luas Finglas, BusConnects and the Royal Canal Greenway, in addition to facilitating the enhancement of connections and public realm in the area, the boundary of the Masterplan extends beyond the industrial lands to an area of 77 hectares. This area includes 66 hectares of land zoned in the Development Plan. Approximately 10 ha of this land is not developable. This includes land zoned Z9 (Amenity/Open Space Lands/Green Network) and Z11 (Waterways Protection) and includes existing railway and Luas lines, stations and associated infrastructure required to support existing and proposed public transport. The urban framework set out in the Masterplan and the development capacity relates to the 45.5 hectares of Z6 (Employment/Enterprise) lands.

Following the recent public consultation process between 14th April 2025 and 12th May 2025, the Chief Executive proposes a number of changes to be included in the final Masterplan. Subject to the approval of the Elected Members, this Masterplan will be incorporated into the Development Plan by way of variation. This variation will change the land use zoning of the 45.5 hectares of Z6 (Employment/Enterprise) lands to Z14 (Strategic Development and Regeneration Area (SDRA)) and will incorporate the Masterplan by way of a new SDRA. At this stage the Masterplan will become statutory.

The Masterplan will then sit within the operational Development Plan. The Development Plan sets out the policies, objectives and standards through which all proposed developments are assessed. It is not the intention that this Masterplan repeat these measures. The Masterplan sets out the blueprint to guide future development proposals and investment opportunities, providing a spatial framework that supports the Development Plan.

1.1 Format of report

The purpose of this report is to present the Chief Executive's response to the issues raised in the submissions/observations received during the public consultation process carried out on the draft Baile Bogáin Masterplan and, where relevant, to make recommendations on amendments to the draft Masterplan, as appropriate. The issues raised by statutory and public bodies are summarised and responded to individually in section 2.2. All other issues raised are categorised in accordance with the chapters in the draft Masterplan and summarised and responded to in section 2.3. Other issues raised are addressed thematically in section 2.3.7.

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

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

To assist those utilising a screen reader:

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

Deletions are enclosed with brackets with the following format: **~~{deletion}~~**

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

1.2 Public Consultation Programme

The draft Masterplan was placed on public display for 4 weeks from 14th April 2025 to 12th May 2025 (both dates inclusive). During this time, members of the public and interested parties were invited to make comments and suggestions to help enhance the Masterplan. Information on the draft Masterplan and environmental reports (Strategic Environmental Assessment (SEA) Report, Appropriate Assessment (AA) Report and Strategic Flood Risk Assessment (SFRA)) were disseminated to the public as follows:

- A briefing was held with the Elected Members on 21st February 2025, in advance of the commencement of the public consultation process.
- Letters that provided notification of the draft Baile Bogáin Masterplan consultation programme and an invitation for submissions were distributed to, inter alia, the Minister for Housing, Local Government and Heritage, and relevant statutory/public authorities.
- Notification of the display of the draft Masterplan and Environmental Reports for public consultation was placed in the Irish Times on 14th April 2025 with information on the public consultation programme and an invitation for submissions.
- A copy of the draft Masterplan together with the accompanying environmental reports was displayed at:
 - Dublin City Council Civic Offices, Planning Public Counter, Ground Floor, Block 4, Wood Quay, Dublin 8, Monday to Friday 9.00am to 4.30pm.
 - Cabra Area Office, 97 New Cabra Road, Dublin 7, Monday to Friday from 9:30am to 1pm.
 - Finglas Civic Centre, Mellowes Road, Dublin 11, Monday to Friday from 9.00am to 4.00pm.
- Members of Dublin City Council staff were available for two public drop-in sessions held at Cabra Parkside Community Sports Centre, to discuss and explain the process for making the Masterplan and to assist with any queries in relation making a submission on:
 - Tuesday 29th April from 1pm to 3.00pm
 - Thursday 1st May from 4.30pm to 6.30pm
- Letters notifying the display of the draft Masterplan and invitation for submissions were distributed to local land owners/businesses in the Dublin Industrial Estate.
- Throughout the consultation period, a number of queries and clarifications were responded to via the localareaplan@dublincity.ie email address, to assist members of the public in making a submission.

- Submissions were invited by one of two options:
 - Online via the DCC consultation portal.
 - By post.

The final date for the receipt of all submissions was 4.30 pm on 12th May 2025.

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

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

Dublin City Council has prepared an Environmental Report as part of the Strategic Environmental Assessment (SEA) process in respect of the Draft Baile Bogáin (Ballyboggan) Masterplan under the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. 435/2004) as amended.

A Natura Impact Statement (NIS) has been completed having regard to the requirements outlined in Article 6(3) of the EU Habitats Directive and Section 177U of the Planning and Development Act and has been prepared in order to facilitate the requirement for completing an Appropriate Assessment (AA) of the Plan.

A Strategic Flood Risk Assessment (SFRA) and Rainwater Management Strategy (RMS) was also prepared.

The prescribed environmental bodies were consulted in advance of the commencement of the public consultation process, with no objections raised within the appropriate period.

Any amendments that may be made to the draft Masterplan will be subject to further screening for SEA and AA prior to the finalisation of the Masterplan.

1.4 Next Steps

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

The Baile Bogáin Masterplan and the process for making the same is non-statutory. Therefore, there are no statutory timeframes set out in the Planning and Development Act 2000 (as amended) for considering this Chief Executive's report. The Chief Executive intends for the report and the draft Masterplan to be considered at the Central Area Committee Meeting in July 2025.

Following this, the Chief Executive intends to commence a variation to the Dublin City Development Plan 2022-2028, to re-zone the Z6 (Employment/Enterprise) lands, to Z14 (Strategic Development and Regeneration Area (SDRA)) and to incorporate the agreed Masterplan into the Development Plan as a new SDRA. At this stage the Masterplan will become statutory as part of the Dublin City Development Plan 2022-2028. Pursuant to Section 13 of the Planning and Development Act 2000, as amended, the proposed variation will be placed on public display for a period of 4 weeks. During this time submissions will be invited. A Chief Executive's Report will be prepared and issued to the elected members of Dublin City Council, no later than 8 weeks after commencing the public consultation process. The consideration of the proposed variation and the Chief Executive's Report shall be completed not later than 6 weeks after the submission of the Report to the elected members. The members, having considered the proposed variation and Chief Executive's report, may, by resolution as they consider appropriate, make the variation, with or without modifications, or they may refuse to make it.

2.0 Submissions Received

A total of 144 submissions were received by DCC during the consultation period. Each submission was assigned to one of the following groups, to assist with the analysis.

- Statutory/public body / state agency
- Elected representatives
- Residents groups/associations, residents and members of the public
- Landowners, businesses and commercial interests
- Community groups, sports clubs, health and education

Each submission was carefully reviewed by DCC and the issues raised therein coded/categorised thematically in accordance with each chapter and/or other themes raised. Many individual submissions make observations on a number of matters. As such, it is common that the issues raised in individual submissions are addressed across multiple sections of this report. This qualitative methodology ensures that all submissions are treated equally and that the issues raised are analysed and responded to.

The purpose of this report is to briefly summarise the **issues** raised in these submissions and present the Chief Executive's response and recommendation. Those issues raised by prescribed bodies or state agencies are summarised individually in section 2.2, while all other submissions are summarised in section 2.3 grouped in accordance with each chapter of the draft Masterplan and under various topics/themes.

For clarity, submissions received from prescribed bodies or state agencies are listed in table 1 below. All submissions received are listed in table 2, in the order received.

Table 1: Statutory/public body / state agency

Submission ID	Statutory/Public Body / State Agency
DCC-C57-130	Transport Infrastructure Ireland
DCC-C57-103	National Transport Authority
DCC-C57-78	Iarnród Éireann
DCC-C57-145	Department of Education and Youth
DCC-C57-74	Uisce Éireann
DCC-C57-75	Office of Public Works
DCC-C57-108	Department of Housing, Local Government and Heritage
DCC-C57-57	Environmental Protection Agency
DCC-C57-109	Health Services Executive

Table 2: Index of submissions received

Submission ID	Submitted by:
DCC-C57-1	Joe O'Connor

DCC-C57-2	Mark McNamara
DCC-C57-3	Adam Stafford
DCC-C57-4	Cian McGuire
DCC-C57-5	Ian Baldwin
DCC-C57-7	Stephen Crosbie
DCC-C57-8	Louisa Moss
DCC-C57-9	Alexander Byrne
DCC-C57-10	Cathal McNamara
DCC-C57-12	Niall Feeney
DCC-C57-13	Evan Sheahan
DCC-C57-14	Killian Redmond
DCC-C57-15	Declan Fitzpatrick
DCC-C57-16	Ruairi Browne
DCC-C57-17	Karl Nolan
DCC-C57-18	Eugene Mitchell
DCC-C57-19	Jack Rowland
DCC-C57-20	Barbara Rybacha
DCC-C57-21	John Keel
DCC-C57-22	Eanna Forde
DCC-C57-23	Gerard Matthews
DCC-C57-24	Sam Moore
DCC-C57-25	Hugh Golden
DCC-C57-26	Glenn Prendergast
DCC-C57-27	Stephen Donnelly
DCC-C57-28	Jason Ennis
DCC-C57-29	Kevin Frank

DCC-C57-30	Rónin CrossFit Limited
DCC-C57-31	John Keel
DCC-C57-32	Austin Kelly
DCC-C57-33	Cathal Kelleher
DCC-C57-34	Lauren O'Brien
DCC-C57-35	Ben Quinn
DCC-C57-36	Jamie Doyle
DCC-C57-37	Jonathon Duff
DCC-C57-38	Nathan Curran
DCC-C57-39	Michael Galvin
DCC-C57-40	Shane Coppinger
DCC-C57-41	David Armstrong
DCC-C57-42	Luke Robinson
DCC-C57-43	Dylan Stuart
DCC-C57-44	I R
DCC-C57-45	Mark Boyle
DCC-C57-46	Daniel Byrne
DCC-C57-47	Noel Faherty
DCC-C57-48	Roibeárd Doyle
DCC-C57-49	Colin Murray
DCC-C57-50	Jordan Kerin
DCC-C57-51	Ronan O'Brien
DCC-C57-52	Brian Stafford
DCC-C57-53	Shane Fitzgibbon
DCC-C57-54	Aisling Sinclair
DCC-C57-55	Eimear Nolan

DCC-C57-56	Cathal Nolan
DCC-C57-57	Environmental Protection Agency
DCC-C57-58	Cabra Judo Club
DCC-C57-59	Sankalpa CLG
DCC-C57-60	Peter Carpenter
DCC-C57-61	Paul Saxon
DCC-C57-62	Colin Murray
DCC-C57-63	Martin Deegan
DCC-C57-64	RK Consulting
DCC-C57-65	Eimhín McEvoy
DCC-C57-66	Vantage Towers Limited
DCC-C57-67	Cabra Boxing Club (Sankalpa)
DCC-C57-68	MM Fibre packaging Ireland
DCC-C57-69	Artisan Marble and Porcelain Wholesale Ltd
DCC-C57-70	M.D. O'Loughlin and Company Solicitors
DCC-C57-71	Micheal Halton
DCC-C57-72	Leanne O' Connor
DCC-C57-73	Aga Seliga-Moloney
DCC-C57-74	Uisce Éireann / Irish Water
DCC-C57-75	Office of Public Works
DCC-C57-76	Flynn Group
DCC-C57-77	Geoff Lillis
DCC-C57-78	Iarnród Éireann
DCC-C57-79	Thomas P Jones
DCC-C57-80	Fiacre O' Cairbre
DCC-C57-81	Pirate Studios Ltd

DCC-57-82	Naoise Dolan
DCC-C57-83	Niamh Killeen
DCC-C57-84	Chloe Victory
DCC-C57-85	Eilis Almqvist
DCC-C57-86	Kerry Lawless
DCC-C57-87	Cathal Melinn
DCC-C57-88	Christopher Tyrrell
DCC-C57-89	Caoimhín Ó Cadhla
DCC-C57-90	Antonio Marin
DCC-C57-91	Niamh Delaney
DCC-C57-92	RCCG Open Heavens Dublin
DCC-C57-93	Gerry Conroy
DCC-C57-94	Martin Hoey
DCC-C57-95	Pavlo D
DCC-C57-96	Anna Lalor
DCC-C57-97	CLG Na Fianna
DCC-C57-98	Breen Rachel
DCC-C57-99	Irene Martini
DCC-C57-100	Filip Bunea
DCC-C57-101	Rory O'Brien
DCC-C57-102	Daniel Logan
DCC-C57-103	National Transport Authority
DCC-C57-104	Jane Macaulay
DCC-C57-105	Kimpton Vale Ltd.
DCC-C57-106	Conor Gavin
DCC-C57-107	Ann Rattigan

DCC-C57-108	Development Applications Unit, Department of Housing, Local Government and Heritage
DCC-C57-109	HSE Environmental Health
DCC-C57-110	Woodberry Packaging Limited
DCC-C57-111	Lorraine Scanlon
DCC-C57-112	Anna O'Brien
DCC-C57-113	Elaine Coffey
DCC-C57-114	Redlock Ltd
DCC-C57-115	Ann Macaulay
DCC-C57-116	United Ireland Propco 23 Limited
DCC-C57-117	Ballybunion Glen Limited
DCC-C57-118	Bartra Property (Broombridge) Limited
DCC-57-119	Conradh na Gaeilge
DCC-C57-120	Noel and Margaret McKenna
DCC-C57-121	Glasnevin Food Market
DCC-C57-122	Keith Gaughan
DCC-C57-123	Downshire Propco Limited
DCC-C57-124	Blacklion Real Estate Fund
DCC-C57-125	Keith Wynne
DCC-C57-126	Fridge Spares (W) Ltd
DCC-C57-127	Blacklion Real Estate Fund
DCC-C57-128	Lara Del Rivero Fernández
DCC-C57-129	Sonya Wilson
DCC-C57-130	Transport Infrastructure Ireland
DCC-C57-131	Blacklion Real Estate Fund
DCC-C57-132	Adam Hoban
DCC-C57-133	Patrick O'Sullivan

DCC-C57-134	Thomas Cooke
DCC-C57-135	Brian Whelan
DCC-C57-136	Marie Sherlock
DCC-C57-137	Fidelma Madden
DCC-C57-138	Give Us The Night (Sunil Sharpe)
DCC-C57-139	Michael Mullen
DCC-C57-140	Prevalent Investments Ltd
DCC-C57-141	Propmaster Ventures Limited
DCC-C57-142	Niamh Holly
DCC-C57-143	Teresa Killeen
DCC-57-144	BAC le Gaeilge
DCC-C57-145	Department of Education and Youth
DCC-C57-146	Frank Byrne

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

2.2.1 Transport Infrastructure Ireland

Summary

A submission was received from Transport Infrastructure Ireland (TII). It was stated that future Luas, Metro and BusConnects alignments are a matter for the National Transport Authority. The submission outlines TII's core functions, including the protection of the strategic function of the road and rail network.

An observation was made regarding the inclusion of the existing Luas infrastructure, Broombridge Tramstop and Depot within the boundary of the Masterplan. The submission emphasises that 'trams require fixed tracks, overhead lines, fixings and associated under and over ground services infrastructure, including trackbed and surfaces, which are complex and costly to alter'. It states that 'changes to this infrastructure and the implementation of amended street finishes and traffic management practices can create disruption to the Luas network service which should be avoided or ameliorated.' It is noted that the practical implementation of any new development within the Masterplan should consult TII's 'Code of engineering practice for works on, near, or adjacent the Luas light rail system' and 'Light Rail Environment -Technical Guidelines for Development', TII Publication no. PE-PDV-00001.

TII stress that the protection of Luas as an existing strategic light rail asset is required as part of any future development proposals and requests that the matters raised in this submission be addressed in the assessment of any development proposals arising within the Masterplan area.

Chief Executive's Response

The Chief Executive notes the submission from Transport Infrastructure Ireland.

While the gross area of the Masterplan constitutes 77 ha of land, the Urban Framework contained within the Masterplan relates to 45.5 hectares of land currently zoned Z6 (Employment/Enterprise). These lands are situated to the north of the Royal Canal, Broombridge Tramstop, depot and rail station. Approximately 10 ha of land included within the Masterplan boundary includes land zoned Z9 (Amenity/Open Space Lands/Green Network) and Z11 (Waterways Protection) and also includes existing railway and Luas lines, stations, depots and associated infrastructure required to support existing and proposed public transport, including Luas Finglas and DART+ West. This land is not developable and was excluded from the calculation of development capacity. It was included to ensure that the future development of the industrial lands supports and is supported by existing and proposed public transportation, in support of regional and national policies pertaining to compact growth, sustainability and transport orientated development.

The protection and enhancement of public transportation in this area is supported by the text of the Masterplan. Matters that might arise as a result of individual development proposals will be adequately addressed as part of the development management process, including all provisions of the Dublin City Development Plan 2022-2028 and any national guidelines or best practice publications. As such, no recommended changes to the Masterplan are required on the basis of the matters raised in this submission.

Chief Executive's Recommendation

No change is recommended.

2.2.2 National Transport Authority

Summary

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

Intensity of Proposed Development

The NTA highlights that the Transport Strategy supports the concept of the 15-Minute City, Transit-Oriented Development and the consolidation of development. They state that Ballyboggan is an appropriate location for intensive residential and commercial development, due to its location within the existing urban fabric of the City and the potential for a large proportion of travel demand to and from the area to be served by existing bus and rail services and by new services and infrastructure proposed under BusConnects, Luas Finglas and DART+ at Broombridge, noting that the majority of the Masterplan area lies within 800m of this interchange.

In this context the submission references the Sustainable and Compact Settlement Guidelines that state that net residential densities of 50-250 dwellings per hectare shall generally be applied in urban neighbourhoods such as Ballyboggan. The submission acknowledges that the stated density range in the draft Masterplan of between 100-250 dwellings per hectare is consistent with the Guidelines and that the land use mix of 3:1 is a matter for the local authority. Notwithstanding this, the NTA request clarity in the Masterplan regarding the intensity of future development to ensure that the best use of public transport is achieved.

The NTA recommends that the final Masterplan includes a policy objective stating that all development proposals should seek the higher range of net residential density and the maximum intensity of commercial development, subject to local constraints. In particular, this is requested in the areas closest to the Broombridge interchange.

Identification of Bus Routes and Facilities

The NTA recommends that the final Masterplan includes provision of a viable and convenient east-west bus connection between Finglas Road and Broombridge Road, including facilities for the layover and turnaround for bus services and bus stopping arrangements to be agreed with the NTA. Further engagement is welcomed.

New Bridge over Royal Canal

The NTA recommends that the final Masterplan includes an objective to deliver an additional pedestrian bridge from the northeastern end of Ballyboggan into Broombridge interchange, to be agreed with the NTA, TII and Irish Rail. This is to enhance connectivity to Broombridge interchange for future residents in the north eastern part of the lands.

Major Transport Infrastructure Projects

The NTA recommends that the Masterplan includes a specific objective which states that any development proposal which may interface with works proposed as part of Luas Finglas or DART+ West must consider these projects and should only be progressed in consultation with the NTA. Reference is made to planning consent obtained by Irish Rail for the delivery of DART+ West and the Railway Order for Luas Finglas submitted by Transport Infrastructure Ireland.

Cycling and Walking

The NTA recommends that, in finalising the Masterplan, consideration be given as to how the area's internal cycle network could most effectively tie-in to the GDA Cycle Network to provide continuity through Ballyboggan, as well as safe access to Broombridge interchange from the surrounding area.

Permeability

The NTA recommends that an objective is included in the final Masterplan stating that the route identified for bus services is managed to restrict through movement by private car.

Development Potential South of the Royal Canal

The submission notes that as part of the development of Luas Finglas, the space allocated for buses at the Broombridge interchange will be reconfigured, with the loss of some space. It is noted that there is potential that an increased level of space will be required in the future and that this should be protected as part of the Masterplan. The NTA recommends that an objective is included in the final Masterplan to identify long-term requirements for interchange at Broombridge in collaboration with the NTA and that some high-level detail is provided on development potential along Bannow Road.

Chief Executive's Response

The Chief Executive notes the submission from the NTA. Responses to the issues raised are set out below.

Intensity of Proposed Development

The Chief Executive emphasises that the Masterplan represents an urban design led and evidence-based approach to the regeneration and balanced densification of this strategic landbank, capitalising on the significant state investment in public transport to include DART+ West, Luas Finglas and BusConnects, in accordance with national and regional policy relating to compact and sustainable growth. In addition to facilitating new homes and supporting existing and future jobs, the Masterplan is underpinned by exemplary urban design principles that fully integrate existing amenities to include the Broombridge transport interchange and the Royal Canal corridor. The Masterplan is fully aligned with the Transport Strategy for the Greater Dublin Area 2022-2042 and the principles of Transit-Oriented Development.

Chapter 1 of the draft Masterplan clearly states that it is not the intention that the Masterplan repeat the policies, objectives and standards of the operational Development Plan, through which all development proposals are assessed. In this context, the net residential density ranges set out in the Development Plan for Strategic Development and Regeneration Areas (SDRAs) are between 100-250 units per hectare. Densities in this range fully align with the Sustainable Residential Development and Compact Settlement Guidelines (2024) (the Guidelines). The calculation of development capacity is based on Appendix B (Measuring Residential Density) of the Guidelines and based on an approximate land use mix of 3:1 residential to commercial/enterprise/community uses. It is also emphasised in the Masterplan that this is an anticipated approximate yield.

Having regard to the clarity sought by the NTA, the Chief Executive accepts that clarity is required in the Masterplan regarding the following:

- i. The net residential area of the Masterplan lands
- ii. The application of the appropriate density range

While the gross area of the Masterplan constitutes 77 hectares of land, the stated development capacity and urban framework prepared relates to 45.5 hectares of land currently zoned Z6 (Employment/Enterprise).

It should be noted that 10 hectares of land within the overall boundary is not developable. This includes existing railway and Luas lines, stations, public realm, depots and associated infrastructure required to support existing and proposed public transport, including Luas Finglas and DART+ West, referenced by the NTA in this submission. It also includes lands

zoned Z9 (Amenity/Open Space Lands/Green Network) and Z11 (Waterways Protection) along the Royal Canal Corridor. Full details are included in the table below.

Table 3: Development area

Description	Area
Gross area of Masterplan lands	77 ha
Area of zoned land within the Masterplan	66 ha
Area of land zoned Z9 (Amenity/Open Space Lands/Green Network) and Z11 (Waterways Protection), excluded from the calculation of development capacity.	6.1 ha
Additional zoned land excluded from the calculation of development capacity due to constraints, to include railway and Luas tracks / corridors, stations, depot and associated infrastructure, including current and future requirements as part of Luas Finglas and DART+ West.	4.2 ha
Existing Educational uses: TU Dublin Sports Campus, Broombridge Educate Together National School	3.8 ha
Z1 lands to north east of Masterplan, containing established residential development	1.24 ha
Lands south of Broombridge interchange on Bannow Road	5.16 ha
Area of the lands subject to land use zoning Z6 (Employment/Enterprise), which is subject to the Urban Framework and forthcoming variation to the Dublin City Development Plan 2022-2028.	45.5 ha

The development potential largely relates to 45.5 hectares of industrial lands, situated north of the Royal Canal. The Urban Framework prepared relates to these lands. Urban infill and consolidation opportunities exist along Bannow Road. Such capacity is included in the existing Core Strategy of the Development Plan.

The net residential area of the Z6 lands was calculated having regard to Appendix B (Measuring Residential Density) of the Guidelines. Net area excludes:

- Major road/streets such as Arterial Streets and Link Streets as defined by Section 3.2.1 DMURS.
- Lands used for commercial development (inc. retail, leisure and entertainment).
- Lands for primary schools, churches and other community services and facilities.
- Larger, Regional or District Parks, Wayleaves or rights of way.
- Other areas of land that cannot be developed due to environmental sensitives, topographical constraints (i.e. steepness) and/or are subject to flooding.

The net residential area is **28 hectares**, clarified in the table below.

Table 4: Net residential area

Description	Area
Area of the lands subject to land use zoning Z6 (Employment/Enterprise)	45.5 ha
Reserved site for schools	2 ha
Linear Park & Community Grade 1 Parks	6 ha
Net residential at 75%/25% land use mix	28 ha

An application of the prescribed net residential density ranges for SDRAs as set out in the Development Plan to the net residential area is provided in the table below.

Table 5: Net residential density

Net residential area	Dublin City Development Plan 2022-2028 net density range for SDRAs 100-250 uph	Residential Development Capacity
28 ha	100 uph	2,800 units
28 ha	250 uph	7,000 units
28 ha	Assuming deviation +/- 15%	6,087 units, +/- 15%

While the Development Plan sets a broad range between 100-250 uph for SDRAs, there is a presumption in the Masterplan that densities in the upper end of this range are achievable, subject to site specific constraints and considerations. It is also prudent to note that not all sites will be capable of achieving 250 uph. By assuming a +/- 15% to account for variability regarding site constraints, uses and design responses an anticipated residential development capacity of 6,087 units, +/- 15% is expected. It is also stressed that the Development Plan permits densities in excess of 250 uph but below 300 uph on a case-by-case basis, subject to amenity safeguards.

Development capacity at a policy level is based on applying a number of strategic assumptions. It is not to be interpreted as a target or ceiling and is intended to ensure that adequate infrastructure is provided and planned for and that strategic lands are developed at an appropriate scale.

The Chief Executive is of the view that the above provides comprehensive clarity that the Masterplan facilitates an appropriate intensity and scale of development in accordance with national policy and the Development Plan. It is accepted that confusion has arisen regarding the correct application of net residential density, along with a lack of clarity in the Masterplan regarding the land area of the Z6 industrial lands. The Masterplan will be amended to include clarifying text regarding the lands subject to the Urban Framework and the net residential area. While the recommendation of the NTA to include a policy are noted, having regard to the clarification provided above, it is not considered that this is necessary.

Identification of Bus Routes and Facilities

The Chief Executive notes the recommendation to include provision for an east-west bus connection between Finglas Road and Broombridge Road, to include facilities for layover, turnaround and stopping arrangements. Figure 3.9 Street & Movement Hierarchy in the Masterplan identifies secondary routes, including a proposed connection between Ballyboggan Road and Lagan Road. These streets have the potential support a future bus route and supporting facilities, subject to detailed design. Further consultation with the NTA is welcomed to explore the implementation of such a route, and having regard future interaction with the proposed Luas Finglas extension. It is therefore considered appropriate to provide clarifying text which supports a future bus connection along the identified secondary routes, which will be subject to detailed design in consultation with the NTA and related stakeholders during the implementation stage of the Masterplan.

New Bridge over Royal Canal

The Chief Executive notes the recommendation to include an objective to deliver an additional pedestrian bridge across the Royal Canal and rail line to enhance connectivity to Broombridge interchange. It is also noted that the proposed pedestrian bridge as part of Luas Finglas was omitted from the submitted railway order, following the assessment of options. Dublin City Council fully supports enhanced connectivity in this location. In the context of DART+ West, Luas Finglas and the proposed Royal Canal Greenway, the location and design of such a bridge requires careful consideration. As such, further engagement with the NTA, TII and Irish Rail is welcomed. It is considered appropriate to provide additional text which supports a future connection, while ensuring that such a bridge will not

impede the Royal Canal Greenway and proposed linear park, and having regard to any environmental considerations.

Major Transport Infrastructure Projects

The Masterplan set out the strategic framework to guide the redevelopment of the subject lands. Following a forthcoming variation process, the Masterplan will sit within the operational Dublin City Development Plan. The Masterplan will not provide consent for individual projects. All proposals will be subject to development consent via the statutory development management process. The protection and enhancement of public transportation in this area is supported by the text of the Masterplan. Matters that might arise as a result of individual development proposals will be adequately addressed as part of the development management process, including all provisions of the Dublin City Development Plan 2022-2028 and any national guidelines or best practice publications. As such, no recommended changes to the Masterplan are required on the basis of this issue.

Cycling and Walking

The NTA has requested that consideration be given as to how the areas internal cycle network could most effectively tie-in to the GDA Cycle Network. There is an assumption that the street network within the Masterplan supports pedestrian and cycle movement throughout. The proposed Royal Canal Greenway will provide this strategic connection, in addition to the identified amenity/pedestrian/cycling route linking to Broombridge interchange in figure 3.9 of the Masterplan. Furthermore, secondary routes in figure 3.9 will also facilitate these strategic linkages. It is not considered that any changes are required.

Permeability

As noted above, the Chief Executive welcomes future consultation with the NTA regarding a future bus route through the lands. This matter has been adequately addressed above.

Development Potential South of the Royal Canal

The matter regarding the development potential south of the Royal Canal has been comprehensively addressed and clarified above. The development capacity envisaged relates to the 45.5 hectares of industrial land north of the Royal Canal. The inclusion of lands to the south is in keeping with best practice planning and ensuring that public transportation is at the heart of the future redevelopment of the lands. Capacity on these lands has been considered within the core strategy of the Development Plan. However, it is considered appropriate in the interest of clarity to provide an approximate development yield for these lands, distinct from that of the industrial lands.

Chief Executive's Recommendation

The Masterplan will be updated to include the following text.

AMENDMENT 1

Chapter 1: Introduction & Vision

Page: 2

First paragraph

Amendment

Dublin City Council (DCC) has prepared a Masterplan for approximately 77 hectares of land **{that includes 45.5 hectares}** at Dublin Industrial Estate and environs as an action of the Dublin City Development Plan 2022-2028 (the Development Plan).

AMENDMENT 2

Chapter 1: Introduction & Vision

Policy and Procedural Context

Page: 3

Amendment

~~(The lands are)~~ {This 45.5 hectare land bank is} currently zoned Z6 for employment and enterprise. Residential development is not permitted in the Z6 zone. As such two statutory process would be required to prepare a local plan: (i) statutory local plan process and (ii) statutory variation of the Development Plan.

During the background and pre-draft stages the Government published a new Planning and Development Bill which proposed a radical overhaul of the Irish Planning system including the phasing out of Local Area Plans (LAPs) and their replacement with a suite of new local plans.

While the Planning and Development Act 2024 was enacted in October 2024, the commencement of this act will be phased.

Therefore, in order to facilitate the regeneration of these lands, a non-statutory Masterplan has been prepared {which also includes lands south of the Royal Canal}. Following a consultation process and approval by the elected members, the Masterplan will be incorporated into the Development Plan by way of variation. This variation will change the zoning of the lands to Z14 Strategic Development and Regeneration Area (SDRA) and will incorporate the Masterplan by way of a new SDRA. At this stage the plan will be statutory.

AMENDMENT 3

Chapter 3: Urban Structure

Street and Movement Hierarchy

Page: 16

Last paragraph

Amendment

Strategic pedestrian/cycle amenity links through the area are provided via a proposed amenity route and also along the Royal Canal corridor. This will maximise connectivity between transport interchanges and link the Quaternion/Broombridge urban village to the Slaney Road neighbourhood centre further east. {Dublin City Council supports the provision of a new pedestrian/cycle bridge across the Royal Canal and railway, and will carry out a feasibility assessment in relation to potential designs and funding options in consultation with the NTA and subject to environmental requirements.}

Existing junctions will be monitored as the plan is implemented to ensure they are appropriately designed to facilitate increased pedestrian and cycle movements.

AMENDMENT 4

Chapter 3: Urban Structure

Street and Movement Hierarchy

Page: 16

Figure 3.9

Amendment

Amend the legend:

Existing/improved secondary route (to include vehicular traffic {and potential bus route(s)})

Proposed secondary route (to include vehicular traffic {and potential bus route(s)})

AMENDMENT 5

Chapter 3: Urban Structure

Street and Movement Hierarchy

Page: 17

Amendment

All street typologies within the hierarchy shall be designed in accordance with the requirements of the Design Manual for Urban Roads and Streets (DMURS). Furthermore, in accordance with the Surface Water Management Strategy, all public streets will contain SuDS features to include raingardens and swales. {Until such a time that the NTA identify

a specified route to facilitate the expansion of the existing bus network through the lands, existing/proposed secondary routes illustrated in figure 3.9 will support any expansion of the existing bus network as part of their re-design/design, in consultation with the NTA and DCC.} ~~(Having regard to the existing bus network and walking distances within the site to existing and proposed bus services, including the N2 route along Broombridge Road, it is not anticipated that the internal street network will serve additional routes. However, any) {Any}~~ additional or extended services or infrastructure (bus gates or other measures) proposed to serve the new residential and working population will be supported.

AMENDMENT 6

Chapter 4: Urban Form & Design Density and Development Capacity

Page: 22

Amendment

~~(The Sustainable Residential Development and Compact Settlement Guidelines (2024) and the Dublin City Development Plan 2022-2028 set out the net density ranges that can be supported in the area. This Masterplan applies an urban design approach to the calculation of anticipated density and development capacity in line with the Compact Settlement Guidelines. The calculation of net density was carried out in accordance with Appendix B (Measuring Residential Density) of the Guidelines. The block layouts, building envelopes and building heights illustrated in addition to site specific characteristics including sensitive environmental receptors such as the canal and existing residential development have also been considered.~~

~~The provision of an existing transport interchange at Broombridge and proposals for BusConnects, Dart+ West and Luas Finglas support a compact form of development. As such considering the accessible location for this urban extension, it is considered net density in the range of 100-250 units per hectare as set out for Strategic Development and Regeneration Areas (SDRAs) may be considered.~~

~~Having regard to the sustainable density anticipated on the site and to the urban structure, form and land use mix as set out in the Masterplan, it is anticipated that approximately 6,000 homes can be provided in the area.~~

~~“Having regard to the sustainable density anticipated on the site and to the urban structure, form and land use mix as set out in the Masterplan, it is anticipated that approximately 6,000 homes can be provided in the area.”)~~

{The Sustainable Residential Development and Compact Settlement Guidelines (2024) and the Dublin City Development Plan 2022-2028 set out the net residential density ranges that can be supported in the area. This Masterplan applies an urban design approach to the calculation of anticipated density and development capacity in line with the Compact Settlement Guidelines. The calculation of net residential density was carried out in accordance with Appendix B (Measuring Residential Density) of the Guidelines.

While the gross area of the Masterplan constitutes 77 hectares of land, 66 hectares of this is zoned and a further 10 hectares undevelopable. Such land includes land zoned Z9 (Amenity/Open Space Lands/Green Network) and Z11 (Waterways Protection) and includes rail and Luas infrastructure, stations and depots, excluded from the calculation of development capacity. The development capacity and urban framework prepared relates to 45.5 hectares of land currently zoned Z6 (Employment/Enterprise). The calculated net residential area of this land is 28 hectares. The net residential area

excludes non-residential uses such as the reserved school site, proposed parks, commercial and community uses, based on approximately 75% residential.

The net residential density ranges set out in the Development Plan for Strategic Development and Regeneration Areas (SDRAs) are between 100-250 units per hectare (uph). The provision of an existing transport interchange at Broombridge and proposals for Dart+ West, Luas Finglas and BusConnects support a compact form of development. As such considering the accessible location for this urban extension, there is a presumption that net residential density in the range of 200-250 uph is achievable. Densities greater than 250 uph but not exceeding 300 uph may be considered in certain circumstances on appropriate sites, having regard to the provisions of the Development Plan.

Having regard to the sustainable density anticipated on the site and to the urban structure, form and land use mix as set out in the Masterplan, it is anticipated that approximately 6,000 – 7,000 homes can be provided in the area.

Table 4.1

<u>Development Area</u>	<u>Area</u>	<u>Net residential area</u>	<u>Net residential density</u>	<u>Anticipated Development Capacity</u>
<u>Urban Framework lands</u>	<u>45.5 ha</u>	<u>28 ha</u>	<u>200-250 uph</u>	<u>6,000–7,000*</u>

- Development capacity rounded off.

Additional infill opportunities also exist on residential zoned lands to the north east and south of the Royal Canal. These lands have an estimated capacity to deliver between 1,000-1,500 homes, based on comparable densities.}

2.2.3 Iarnród Éireann

Summary

A submission was received from Iarnród Éireann which outlined the support for Transport Orientated Development (TOD) in proximity to stations such as Broombridge. The submission outlined the planned upgrades to the rail network as part of the DART+ programme and emphasised the future doubling of capacity of the DART+ West line in particular. The submission requests Dublin City Council to consider whether the proposed densities are sufficient in the context of TOD, citing National Policy Objective 10 of the revised National Planning Framework (NPF) and having regard to planned investments. The submission welcomes further collaboration between Iarnród Éireann and Dublin City Council for the effective planning and delivery of both DART+ West and the Ballyboggan Masterplan.

Chief Executive’s Response

The Chief Executive notes the submission from Iarnród Éireann. The Ballyboggan Masterplan represents an urban design led and evidence-based approach to the regeneration and balanced densification of this strategic landbank, capitalising on the significant state investment in public transport to include DART+ West, Luas Finglas and BusConnects, in accordance with national and regional policy relating to compact and sustainable growth. In addition to facilitating new homes and supporting existing and future jobs, the Masterplan is underpinned by exemplary urban design principles that fully integrate existing amenities to include the Broombridge transport interchange and the Royal Canal corridor. The Masterplan is fully aligned with the Transport Strategy for the Greater Dublin

Area 2022-2042 and the principles of Transport Orientated Development, with regards to National Policy Objective 10 of the NPF.

The development capacity and density of these lands has been comprehensively outlined in response to the National Transport Authority (see section 2.2.2). It is emphasised again that while the gross area of the Masterplan constitutes 77 hectares of land, 66 hectares of this is zoned and a further 10 hectares undevelopable. Such land includes the Royal Canal corridor, amenity/open space/green network and includes rail and Luas infrastructure to include stations and depots. The development potential largely relates to **45.5 hectares** of lands zoned Z6 (Employment/Enterprise), situated north of the Royal Canal. In order to implement the Masterplan, this land will be subject to a forthcoming variation of the Development Plan which proposes re-zoning the land to Z14 (Strategic Development and Regeneration Area). The Urban Framework prepared relates to these lands. The calculated net residential area of this land is **28 hectares**. The net residential area excludes non-residential uses such as the reserved school site, commercial, community and primary open spaces.

The net residential density ranges set out in the Development Plan for Strategic Development and Regeneration Areas (SDRAs) are between 100-250 units per hectare. Densities in this range fully align with the Sustainable Residential Development and Compact Settlement Guidelines (2024) (the Guidelines). The calculation of development capacity is based on Appendix B (Measuring Residential Density) of the Guidelines. There is a presumption in the Masterplan that densities in the upper end of this range are achievable, subject to site specific constraints and considerations. It is also prudent to note that not all sites will be capable of achieving 250 uph. By assuming a +/- 15% to account for variability regarding site constraints, uses and design responses an anticipated residential development capacity of 6,087 units, +/- 15% is expected. It is also stressed that the Development Plan permits densities in excess of 250 uph but below 300 uph on a case-by-case basis, subject to amenity safeguards. Development capacity at a policy level is based on applying a number of strategic assumptions. It is not to be interpreted as a target or ceiling and is intended to ensure that adequate infrastructure is provided and planned for and that strategic lands are developed at an appropriate scale.

The Chief Executive is of the view that comprehensive clarity has been provided demonstrating that the Masterplan facilitates an appropriate intensity and scale of development in accordance with national policy and the Development Plan which supports existing and planned investments in public transportation. It is accepted that confusion has arisen regarding the correct application of net residential densities, along with a lack of clarity regarding the land area of the Z6 industrial lands. The Masterplan will be amended to include clarifying text regarding the lands subject to the Urban Framework and the net residential area. The Chief Executive welcomes future engagement with Iarnród Éireann.

Chief Executive's Recommendation

The draft Masterplan will be amended to include:

AMENDMENT 1

Chapter 1: Introduction & Vision

Page: 2

First paragraph

Amendment

Dublin City Council (DCC) has prepared a Masterplan for approximately 77 hectares of land **{that includes 45.5 hectares}** at Dublin Industrial Estate and environs as an action of the Dublin City Development Plan 2022-2028 (the Development Plan).

AMENDMENT 2

Chapter 1: Introduction & Vision Policy and Procedural Context

Page: 3

Amendment

~~(The lands are)~~ {This 45.5 hectare land bank is} currently zoned Z6 for employment and enterprise. Residential development is not permitted in the Z6 zone. As such two statutory process would be required to prepare a local plan: (i) statutory local plan process and (ii) statutory variation of the Development Plan.

During the background and pre-draft stages the Government published a new Planning and Development Bill which proposed a radical overhaul of the Irish Planning system including the phasing out of Local Area Plans (LAPs) and their replacement with a suite of new local plans.

While the Planning and Development Act 2024 was enacted in October 2024, the commencement of this act will be phased.

Therefore, in order to facilitate the regeneration of these lands, a non-statutory Masterplan has been prepared {which also includes lands south of the Royal Canal}. Following a consultation process and approval by the elected members, the Masterplan will be incorporated into the Development Plan by way of variation. This variation will change the zoning of the lands to Z14 Strategic Development and Regeneration Area (SDRA) and will incorporate the Masterplan by way of a new SDRA. At this stage the plan will be statutory.

AMENDMENT 6

Chapter 4: Urban Form & Design Density and Development Capacity

Page: 22

Amendment

~~(The Sustainable Residential Development and Compact Settlement Guidelines (2024) and the Dublin City Development Plan 2022-2028 set out the net density ranges that can be supported in the area. This Masterplan applies an urban design approach to the calculation of anticipated density and development capacity in line with the Compact Settlement Guidelines. The calculation of net density was carried out in accordance with Appendix B (Measuring Residential Density) of the Guidelines. The block layouts, building envelopes and building heights illustrated in addition to site specific characteristics including sensitive environmental receptors such as the canal and existing residential development have also been considered.~~

~~The provision of an existing transport interchange at Broombridge and proposals for BusConnects, Dart+ West and Luas Finglas support a compact form of development. As such considering the accessible location for this urban extension, it is considered net density in the range of 100-250 units per hectare as set out for Strategic Development and Regeneration Areas (SDRAs) may be considered.~~

~~Having regard to the sustainable density anticipated on the site and to the urban structure, form and land use mix as set out in the Masterplan, it is anticipated that approximately 6,000 homes can be provided in the area.~~

~~“Having regard to the sustainable density anticipated on the site and to the urban structure, form and land use mix as set out in the Masterplan, it is anticipated that approximately 6,000 homes can be provided in the area.”)~~

{The Sustainable Residential Development and Compact Settlement Guidelines (2024) and the Dublin City Development Plan 2022-2028 set out the net residential density

ranges that can be supported in the area. This Masterplan applies an urban design approach to the calculation of anticipated density and development capacity in line with the Compact Settlement Guidelines. The calculation of net residential density was carried out in accordance with Appendix B (Measuring Residential Density) of the Guidelines.

While the gross area of the Masterplan constitutes 77 hectares of land, 66 hectares of this is zoned and a further 10 hectares undevelopable. Such land includes land zoned Z9 (Amenity/Open Space Lands/Green Network) and Z11 (Waterways Protection) and includes rail and Luas infrastructure, stations and depots, excluded from the calculation of development capacity. The development capacity and urban framework prepared relates to 45.5 hectares of land currently zoned Z6 (Employment/Enterprise). The calculated net residential area of this land is 28 hectares. The net residential area excludes non-residential uses such as the reserved school site, proposed parks, commercial and community uses, based on approximately 75% residential.

The net residential density ranges set out in the Development Plan for Strategic Development and Regeneration Areas (SDRAs) are between 100-250 units per hectare (uph). The provision of an existing transport interchange at Broombridge and proposals for Dart+ West, Luas Finglas and BusConnects support a compact form of development. As such considering the accessible location for this urban extension, there is a presumption that net residential density in the range of 200-250 uph is achievable. Densities greater than 250 uph but not exceeding 300 uph may be considered in certain circumstances on appropriate sites, having regard to the provisions of the Development Plan.

Having regard to the sustainable density anticipated on the site and to the urban structure, form and land use mix as set out in the Masterplan, it is anticipated that approximately 6,000 – 7,000 homes can be provided in the area.

Table 4.1

<u>Development Area</u>	<u>Area</u>	<u>Net residential area</u>	<u>Net residential density</u>	<u>Anticipated Development Capacity</u>
<u>Urban Framework lands</u>	<u>45.5 ha</u>	<u>28 ha</u>	<u>200-250 uph</u>	<u>6,000–7,000*</u>

- Development capacity rounded off.

Additional infill opportunities also exist on residential zoned lands to the north east and south of the Royal Canal. These lands have an estimated capacity to deliver between 1,000-1,500 homes, based on comparable densities.}

2.2.4 Department of Education and Youth

Summary

A submission was received from the Department of Education and Youth. Acknowledgement is given to the consultations which occurred between DCC and the Department as part of the preparation of the Masterplan. The Department consider that a potential population over 16,000 people could require at least three primary and one post primary school. The Department notes and welcomes the reservation of a proposed education site that can cater for up to two schools. Minor amendments to the wording of Specific Design Objective 16 are requested, referencing the provision of more than one school.

It is noted that the Masterplan does not reserve a specific site for a post primary school. The Department acknowledges that the size of the Masterplan area may require a post primary school to be located outside the plan area. It notes that it is crucial that a suitable site is available if required. It also emphasises that no provision for a third primary school is provided for in the Masterplan or the immediate environs, which similarly may be required according to their analysis.

The Department requests that DCC confirm if the site identified in the Masterplan is situated adjacent to community facilities and centre to a proposed new neighbourhood. It is noted that all enabling infrastructure required to develop and operate a school should be provided for in advance, to include roads, electricity, water infrastructure and transportation links, noting that it is not within the remit of the Department to develop or fund this infrastructure.

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

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

Finally, the submission welcomes the continued engagement regarding the development of new and existing schools and notes the critical work undertaken by the Council to ensure sufficient land is zoned for this purpose.

Chief Executive's Response

The Chief Executive notes the submission from the Department of Education and Youth. It is considered acceptable to amend Specific Design Objective 16, to ensure alignment with the text of the Masterplan by referencing two schools.

While the possible future provision of a post primary school is acknowledged in the Masterplan and it is accepted that additional primary schools may be required in this area, it is emphasised that a significant amount of land is zoned Z15 (Community and Social Infrastructure) in the immediate environs of the Masterplan. Dublin City Council will proactively engage with the Department regarding the identification and/or acquisition of suitable sites and/or supporting the expansion/consolidation of existing sites to provide additional school provision. The requirement for schools in the Masterplan area will also be subject to review, as stated in the Masterplan.

The Chief Executive can confirm that the reserved school site will also contain a shared community facility. The site is located immediately adjacent to a proposed Community Grade 1 park, in addition to a proposed amenity/pedestrian/cycle route which links the site to the proposed Royal Canal Linear Park and greenway and Broombridge Transport interchange. This is situated in the heart of the development within the 'Slaney Road Neighbourhood Centre'. In relation to the provision of services and enabling infrastructure the identified site is situated in an existing industrial estate which is serviced. It is also served by an existing road/street network. While internal roads are required in some instances, the substantive structure is provided for. The location of the site reserved for schools and a community use considered this.

The Chief Executive notes the Department's observations regarding the potential to review current or existing school site provision on the basis of findings of any future assessments, with specific reference to Special Education Needs and other changing priorities.

The Chief Executive welcomes further consultation with the Department in relation to the identification future school sites in the environs of the Masterplan.

Chief Executive's Recommendation

The draft Masterplan will be amended to include the following text.

AMENDMENT 7

Chapter 5: Land Use & Function

Page: 34

Specific Design Objective 16 – School Site

Amendment

Specific Design Objective 16 - School Site:

To reserve a site within the Masterplan to accommodate a new educational facility to serve the population of the area, and to work with the Department of Education where the decision is made to proceed with (a) new school(s). The design of any new educational facility must support a compact approach to infrastructure provision and shall ensure that facilities such as pitches and/or halls can be used out of hours.

2.2.5 Uisce Éireann - Irish Water

Summary

A submission was received from Uisce Éireann (UÉ). It is noted that comments made as part of the issues paper regarding water and sewer networks still hold. It is noted that the Water Supply Capacity Register for the Greater Dublin Area has turned to Amber Status (constrained) since the consultation at Issues Paper stage. It is suggested that this will most likely remain in place until the Water Supply Project is in place.

It is also noted that completion of the Greater Dublin Drainage Project is required to address wastewater treatment capacity. The submission states that neither project is likely to be completed before the end of the plan period (2025-2030).

A specific observation is made relating to Chapter 4: Urban Form and Design - Placeshaping, regarding future development along Bannow Road. It is requested that the existing high quality maintenance building facility on Bannow Road, beside Broombridge Educate Together National School is retained and excluded from any redevelopment plans. It is noted that this facility is owned by DCC but is the operational based for wastewater services staff working under the direction of UÉ. It is noted that this depot is in the optimum strategic location and provides permanent employment to up to 30 operational staff. It is considered that this aligns with the Masterplan regarding employment.

Chief Executive's Response

The Chief Executive notes the submission from UÉ. DCC supports the delivery of the Water Supply Project for the Eastern and Midland Region and the Greater Dublin Drainage Project, recognising their role in supporting the growth of Dublin City. While the status of the water supply to the Dublin Region and wastewater treatment capacity are noted, this is a matter for UÉ as the responsible body for water services for Ireland. DCC has comprehensively engaged with UÉ to deliver sustainable growth to the city and will continue to liaise proactively with them as part of the implementation of the Masterplan.

The urban framework set out in the Masterplan sets out an approximate development capacity which is based on the industrial lands currently subject to land use Z6 (Employment/Enterprise). While the Masterplan boundary includes lands along Bannow

Road, south of the Royal Canal and railway/Luas, it is emphasised that these lands are currently zoned and any infill redevelopments can be considered under the current provisions of the Development Plan. Notwithstanding this, the Masterplan acknowledges that development potential is limited, with existing uses supported. The current depot is supported under the provisions of the Development Plan.

Chief Executive's Recommendation

No change is recommended.

2.2.6 Office of Public Works

Summary

A submission was received from the Office of Public Works (OPW) regarding flood risk and the application of the Guidelines on the Planning System and Flood Risk Management (DECLG/OPW, 2009). The OPW welcome the preparation of a Strategic Flood Risk Assessment and the Rainwater Management Strategy along with the continued commitment to adhere to the appropriate application of the Guidelines and Circular PL02/2014.

The OPW notes that the 2003 Tolka Flood Study is currently under review and requests that DCC notes that flood mapping near Ballyboggan may change as part of the review process.

The OPW welcomes the preparation of a Rainwater Management Strategy. It is requested that DCC reference the hydraulic parameters that are to be adhered to as outlined in Table B-1, in the Plan and/or SFRA. It is also noted that reference is made to the 'Surface Water Management Strategy' throughout the Masterplan. It is suggested that this may want to be updated to avoid confusion.

The OPW also welcomes the breach analysis that has been carried for the Royal Canal and that the strategy for the management of residual risks due to breach has been outlined in the SFRA.

It is noted that further submissions on the proposed variation may be made by the OPW concerning the estate portfolio, heritage and other areas of responsibility.

Chief Executive's Response

The Chief Executive welcomes the submission from the OPW. It is acknowledged that flood zone mapping may change in the environs of the Masterplan as a result of a forthcoming update to the Tolka Flood Study. This will be reviewed.

With regards to referencing hydraulic parameters set out in the Rainwater Management Strategy, it is considered reasonable that additional text be included in the Masterplan emphasising the requirement for relevant individual proposals to reference the Rainwater Management Strategy. It is also considered appropriate that references to the Surface Water Management Strategy be updated to reference the Rainwater Management Strategy, in the interest of clarity.

DCC welcomes further correspondence from the OPW as part of the forthcoming variation process.

Chief Executive's Recommendation

The draft Masterplan will be amended to include the following text.

AMENDMENT 8

Chapter 3: Urban Structure

Water Sensitive Urban Design

Page: 14
Amendment

Delete all references to **(Surface Water Management Strategy)**
Replace with **{Rainwater Management Strategy}**

Additional typographic updates, where relevant, will be made in the final Masterplan.

AMENDMENT 9
Chapter 3: Urban Structure
Water Sensitive Urban Design
Page: 14
Amendment

The Development Plan sets out the requirements for individual development proposals that must be achieved. The measures introduced in this Masterplan provide site-specific measures and guidelines by considering a holistic and comprehensive approach to the long term and sustainable management of rainwater and surface water within the public realm. **{Where relevant, development proposals are required to demonstrate compliance with the measures set out in the Rainwater Management Strategy.}** Additional measures will be required within individual development parcels, in accordance with the Development Plan. The upgrading of the existing public road network and the provision of major SuDS features along Broombridge Road, Ballyboggan Road and Finglas Road will require a coordinated approach between the local authority and other stakeholders. The implementation strategy will be further discussed in Chapter 6.

2.2.7 Department of Housing, Local Government and Heritage

Summary

A submission was received from the Department of Housing, Local Government and Heritage regarding heritage related matters. Reference is made to the previous submission made in May 2023 regarding the issues paper and March of 2025 in relation to the Strategic Environmental Assessment scoping, where the high biodiversity value of the portion of the Royal Canal proposed Natural Heritage Areas (pNHA) is emphasised. It is noted that this contains the canal channel, its towpaths and banks and also includes the undeveloped area north of the canal between it and the Maynooth to Connolly Station railway line and bounded to the east by the Heuston Station to Connolly Station rail line. Rare calcicole plant species including pyramidal orchid, bladder campion and yellow-wort, were pointed out. In addition, the usage of the canal corridor by otter and bat species subject to a system of strict protection under the Habitats Directive (92/43/EEC) was highlighted. Acknowledgement is given to the occurrence of some of these species in the SEA report and reference is made to the results of surveys carried out as part of the SEA process.

The submission notes that badgers have been reported in recent years and recorded on camera at Coke Oven Cottages on the Royal Canal bank just outside the Masterplan area to the east of the Heuston to Connolly rail line. It is suggested that badgers are likely to forage over parts of the pNHA and that a badger sett may be dug into the railway embankments or nearby.

The Department welcomes the proposal to lay out a flagship linear park along the northern side of the Royal Canal in part to support and enhance biodiversity. It is noted that Parcel RC3 contains the undeveloped land between the railways referenced above.

The Department state that care is required regarding the proposed Community Grade 1 Park situated to the west of Broombridge Road, to ensure that existing elements of high

biodiversity value are preserved. As part of the detailed design of the parks, it is requested that repeat surveys similar to those already undertaken should be carried out before design work is initiated, and in particular floral and arboreal surveys of the pNHA and its vicinity will be required to ensure that the designs for the parks, and their management regimes are adapted to preserving, and as far as possible enhancing, the currently high botanical and faunal diversity in the canal area.

It is also requested that lighting design in the proposed parks and wider Masterplan area takes account of the light sensitive Daubenton's bat, notwithstanding that only Leisler's bat and the common soprano pipistrelle bats were identified in the bat surveys undertaken in the summer of 2024. Daubenton's bats have been recorded along the Royal Canal in the recent past.

Chief Executive's Response

The Chief Executive welcomes the submission from the Department of Housing, Local Government and Heritage. In particular, the support for the proposed Royal Canal Linear Park and protection of the pNHA corridor is acknowledged. This sensitive area was excluded from the calculation of net residential density, as previously outlined in response to other submissions.

The observations from the Department regarding detailed design and management to include lighting is noted. While the critical nature of such matters is acknowledged in the context of biodiversity protection, these will be addressed as part of detailed design proposals.

DCC will engage with the Department at the appropriate juncture regarding such matters.

Chief Executive's Recommendation

No change is recommended.

2.2.8 Environmental Protection Agency

Summary

A submission was received from the Environmental Protection Agency (EPA). While acknowledgement is given to the draft Masterplan and SEA Environmental Report, it is noted that their functions as an SEA environmental authority do not include approving or enforcing SEAs or plans. Reference to the 'self-service approach' via a guidance document is made. It is recommended that this document is taken into account and incorporated into the plan. It is also recommended that DCC ensure alignment with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Region.

The submissions notes the content that should be included in an environmental report, referencing the SEA Regulations. It is recommended that 'Ireland's State of the Environment Report 2024' is considered and relevant aspects integrated as appropriate in implementing the plan.

It is noted that any future amendments to the plan should be screened for likely significant effects, using the same method of assessment applied in the environmental assessment of the plan. It is stated that once the plan is adopted, a SEA statement should be prepared and this should be sent to all environmental authorities consulted during the SEA process.

Chief Executive's Response

The Chief Executive notes the submission from the Environmental Protection Agency (EPA).

The function of the EPA is noted and in this context the 'self-service approach' via the published guidance documentation. DCC has taken this into account during the preparation of the Environmental Report, which also aligns with the National Planning Framework and Regional Spatial and Economic Strategy for the Eastern and Midlands Region.

Proposed amendments to the Masterplan will be screened for likely significant effects, using the same method of assessment applied in the environmental assessment of the plan. Pending the approval of a forthcoming variation to implement the Masterplan, DCC will prepare a SEA statement and circulate this to the relevant authorities.

Chief Executive's Recommendation

No change is recommended.

2.2.9 HSE Environmental Health – National Office for Environmental Health Services

Summary

A submission was received from the National Environmental Health Service (NEHS) within the context of Healthy Ireland and relevant health supporting policies, strategies and plans. Observations are made under the various chapter headings. Following this, nonspecific comments are made regarding local area planning in general.

The NEHS state that the stated vision for the draft Masterplan aligns with that of Healthy Ireland. It is suggested that this is reiterated throughout the Masterplan. In relation to climate action and sustainability, it is recommended that plans are informed by Climate Change Risk Assessment (CCRA).

The NEHS recommends 'that Urban Structure is viewed with a health lens and seeks to at the very least do no harm, protect public health and enhance public health through good design.'

It is recommended that health-related indicators are included when Dublin City Council monitors and reviews the effect of the Masterplan on the people of that community.

A number of non-specific observations were made regarding climate change, the Sustainable Development Goals, Disaster Risk Reduction, Inclusiveness, Physical Activity and Sustainable Movement, Air Quality, Energy, Noise, Water Quality and Wastewater, Circular Economy and Waste, Sustainable Diets, Tobacco and Vaping.

Chief Executive's Response

The Chief Executive notes the submission from the National Environmental Health Service (NEHS). The observations raised have been considered in the context of the content of the draft Masterplan and within the overall policy context of the Dublin City Development Plan 2022-2028. The Masterplan fosters a plan-led and urban design approach to the future planning of this area, where principles of sustainability are embedded throughout the plan. The vision for the area, including the approach to urban structure, urban design and land use support many of the matters raised by the NEHS. Certain matters regarding detailed design matters or wider health concerns, while noted, are not directly relevant to the Masterplan process. Overall, it is considered that the matters raised are substantially addressed in the content of the draft Masterplan.

Chief Executive's Recommendation

No change is recommended.

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

2.3.1 Introduction & Vision

Summary

Elected representatives

A submission received from Marie Sherlock TD was very supportive of the proposed Masterplan. In particular the need for a mix of housing types was emphasised and the Masterplan commended in this regard. The issues raised will be addressed in subsequent sections of this report.

Residents and members of the public

Several submissions received have expressed support for the vision and principles contained within the draft Masterplan for Ballyboggan and support the ambitious regeneration of the industrial estate lands into a sustainable, liveable new neighbourhood for the city.

Others suggest that the draft Masterplan is not ambitious enough to address the housing crisis, referencing the anticipated development capacity and density. Some expressed the view that the area can support a greater population, citing its proximity to the City and location beside public transport services.

Some submissions support existing businesses and uses remaining on site, with concerns relating to relocation expressed.

Some submissions objected to and disagreed with the naming convention of the Masterplan and proposed neighbourhood. Some of these submissions set out comprehensive proposals to change the name in honour of Sir William Rowan Hamilton, where the theory of quaternions was conceived in 1843 and where there is a commemorative plaque on the bridge.

Landowners, businesses and commercial interests

The submissions received from the landowners and businesses are generally supportive of the draft Masterplan, whilst setting out requests for alterations and amendments to support their individual landholdings. Minor amendments to the wording of the vision are suggested to emphasise proximity to public transport. These issues are addressed in greater detail under the ensuing chapter headings.

The draft Masterplan is criticised in part by some landowners/businesses, suggesting that it does not comply with *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities* and the *Dublin City Development Plan 2022-2028* with regards to density and development capacity, with some stating that relocating would not be financially viable. These matters are addressed comprehensively in section 2.3.4 Urban Form and Design.

A number of submissions received from landowners/businesses expressed a desire to remain on site and as such did not support the vision for the area.

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

Some submissions requested that the Masterplan and future neighbourhood be renamed to better represent the vision and ambition of this project.

Community groups, sports clubs, health and education

The overall approach of the draft Masterplan regarding reusing brownfield urban land is welcomed by a number of sports and community groups operating within the area. However, concerns are also expressed by some community groups regarding the impact that redevelopment will have on their continued presence and operations. Specific matters raised are addressed in subsequent sections of this report.

Chief Executive's Response

The Chief Executive welcomes the support expressed for the vision and design principles set out in the draft Masterplan. The Ballyboggan Masterplan represents an urban design led and evidence-based approach to the regeneration and balanced densification of this strategic landbank, capitalising on the significant state investment in public transport to include DART+ West, Luas Finglas and BusConnects, in accordance with national and regional policy relating to compact and sustainable growth.

While concerns relating to future relocation of existing uses and businesses are noted, the National Planning Framework (NPF) supports compact growth by targeting a significant proportion of future urban development within the existing built footprint of urban areas. This includes the regeneration of urban brownfield lands, including industrial estates in central locations, served by high capacity public transport in order to sustainably accommodate Ireland's future population (NPO 8, NPO 10, NPO 20). The Masterplan is fully aligned with the Transport Strategy for the Greater Dublin Area 2022-2042 and the principles of Transport Orientated Development, with regards to National Policy Objective 10 of the NPF. In addition to facilitating new homes and supporting existing and future jobs, the Masterplan is underpinned by exemplary urban design principles that fully integrate existing amenities to include the Broombridge transport interchange and the Royal Canal corridor.

It is acknowledged that concerns regarding the ambition and vision of this project largely relate to development capacity and residential density. While these matters will be discussed and clarified in detail in section 2.3.4 Urban Form and Design, it is emphasised here that the draft Masterplan fully complies with *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities* and the *Dublin City Development Plan 2022-2028*.

The Chief Executive welcomes the strong engagement and interest from members of the public and interested parties regarding the naming of this future neighbourhood. Requests to name this project/neighbourhood after Sir William Rowan Hamilton are noted. In the first instance it is emphasised that Chapter 1 of the draft Masterplan states that Baile Bogáin (Ballyboggan) is a 'working title' given to the project. This name is derived from the historic townland, which aligns with the place naming protocols of DCC. However, in response to the submissions and interest received, and subject to the approval of the elected members, the Chief Executive is happy to consider alternative naming conventions and therefore recommends that this project be re-named the **Broombridge-Hamilton Masterplan**. It is hoped that this will address confusion regarding location and will also align with the existing public transport interchange. It is emphasised that this does not necessarily prohibit future naming proposals for this new neighbourhood, in accordance with Council protocol.

Chief Executive's Recommendation

The draft Masterplan will be amended to include the following text.

AMENDMENT 10

Front and inner cover pages

Amendment

(Baile Bogáin (Ballyboggan) Masterplan)

{Broombridge-Hamilton Masterplan.}

AMENDMENT 11

Chapter 1: Introduction & Vision

Page: 2

Paragraph 1

Amendment:

The working title given to this land use plan is the (~~“Baile Bogáin Masterplan”~~) {Broombridge-Hamilton Masterplan} (the Masterplan).

Additional typographic updates, where relevant, will be made in the final Masterplan to reflect the naming convention.

2.3.2 Climate Action & Sustainability

Summary

While many submissions received allude to climate action and sustainability, the substantive issues raised in such submissions are addressed elsewhere under other chapter headings.

Nevertheless, some submissions made specific reference to the Masterplans approach to climate action & sustainability highlighting how urban densification reduces urban sprawl, preserves green spaces and reduces the environmental impact. Several references were also made to design detail, noting green roofs, biodiversity corridors, community growing and low energy production.

Chief Executive's Response

The Chief Executive welcomes the support expressed for the draft Masterplan's approach to sustainability and climate action. The National Planning Framework (NPF) supports compact growth by targeting a significant proportion of future urban development within the existing built footprint of urban areas. This includes the regeneration of urban brownfield lands, including industrial estates in central locations, served by high capacity public transport in order to sustainably accommodate Ireland's future population (NPO 8, NPO 10, NPO 20). In this context, the Ballyboggan Masterplan represents an urban design led and evidence-based approach to the regeneration and balanced densification of this strategic landbank, capitalising on the significant state investment in public transport to include DART+ West, Luas Finglas and BusConnects.

The draft Masterplan does not represent a detailed design proposal. It establishes a spatial policy framework, through which individual proposals can proceed. The Dublin City Development Plan 2022-2028 contains policies, objectives and standards regarding sustainable infrastructure and detailed design matters. Such proposals will be subject to all appropriate standards and will be subject to future assessments and consents.

Chief Executive's Recommendation

No change is recommended.

2.3.3 Urban Structure

Summary

Elected representatives

A submission from Marie Sherlock TD noted the need to improve bus capacity along Finglas Road. The requirement for a new access road is also suggested, citing child safety and access to the proposed school and community amenities.

Residents and members of the public

Several submissions have indicated that they support public transportation proposals in the area citing the benefits of increased connectivity and sustainability as positive factors. Some outlined the need for improved public transport links and a need for greater capacity on existing services.

Several submissions have supported the principle of providing segregated cycle lanes, pedestrian routes and crossings throughout the Masterplan. Several submissions suggest a new cycle-friendly bridge across the Royal Canal, especially in the eastern section by the 7th Lock. Some submissions raised concerns relating to accessibility through the site, while a submission mentioned the need for a pedestrian crossing between Glasnevin Court and the Masterplan Lands. It was also noted that the design of streets need to consider accessibility for all users.

A number of submissions have expressed support for the Masterplan's general approach to urban greenery, parks and plazas. Some submissions suggested creating a network of smaller parks. Some submissions related to detailed design matters including integrating recreational spaces with biodiversity zones and tree planting.

Landowners, businesses and commercial interests

Several submissions received from landowners, businesses and commercial interests have sought enhanced flexibility, with many strongly critical of the fixed nature of the urban structure. Some consider the urban structure to be rigid and overly constraining, limiting redevelopment opportunities and placing unnecessary burdens on development opportunities. It was also noted that the fixed nature of the urban structure was more appropriate for a Strategic Development Zone, rather than a masterplan.

A number of submissions sought the removal of, or modifications to some identified local streets/filtered permeability, citing issues including land ownership, development potential, established uses or extant permissions on adjoining lands.

Several submissions sought a reduction in public open space or amenity corridors impacting the respective land holdings, with some proposals for relocating open space onto adjoining land holdings. In particular, some submissions requests changes to or the omission of the identified Community Grade 1 Parks. Numerous submissions seek enhanced clarity regarding the design parameters and land take required to facilitate the Royal Canal Linear Park. In general the view is expressed that uncertainty will hinder redevelopment opportunities.

General support for proposed public transport was noted. However, it was noted by some that Luas Finglas will impact the future operations of businesses along Broombridge Road, due to re-alignment proposals and permanent land acquisition, with active relocation plans in place.

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

Kimpton Vale

- Requests that specifications relating to the proposed local route impacting their site to be provided and requests its location be moved further west.
- Requests that the extent of the proposed Royal Canal Linear Park to be reduced and align with the existing Uisce Éireanns wayleave.
- Seeks clarity regarding the future of Reilly's Community Garden.

Woodberry Packaging Limited – Colorman (Ireland) Ltd.

- Considered that the improved/proposed amenity/pedestrian/cycling route in the northern side of the Colorman premises conflicts with the Luas Finglas alignment, due to a proposed raised bridge. Requests consideration to provide this route to the north of the site.
- Considers that public space provision on their lands is excessive and disproportionate compared to other land holdings, citing the proposed Royal Canal Linear Park, amenity route, major SuDS feature and podium level open space. A reduction in the park width is sought
- Considered that the linear park can be delivered on a phased basis.

Flynn Group

- The submission states that the proposed local route is considered superfluous given the proposal for a public park to the North. It is stated that the proposed route will cut off the new open space from the adjacent built form.
- Concern is raised around traffic movement and safety with regards to those potentially using the park. The submission states it is also not clear how this route will implement permeability measures for local traffic.
- As such it is proposed by the submission to remove the local route and replace it with an enhanced pedestrian and cycle route through the park.
- The submission further states that vehicular traffic should be located to the periphery of the site to improve the safety and amenity of the area.

United Ireland 2023 Propco Limited

- Objects to the identification of a Grade 1 Community Park on their lands.
- A network of medium-sized spaces is sought as an alternative.

Bartra Property Limited

- Seeks the removal of the pedestrian/cycling route within the Royal Canal Linear Park. This is considered redundant due to an adjacent route and its removal will allow modifications to block structure and enhance development opportunities.
- Strengthening of policy supporting car sharing, with enhanced guidance sought.

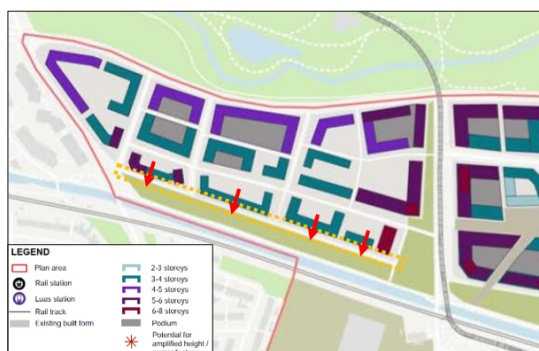


Figure 4.22: Location of the white strip (outlined in dashed yellow) requested to be omitted to allow the buildings and blocks to extend forward (as shown by the red arrows)

Source: *Draft Ballyboggan Masterplan 2025*, annotated by Thornton O'Connor Town Planning (2025)

Fridge Spares Ltd

- Requests the omission of the proposed CP1 Park, located on lands of Fridge Spares Ltd. Conflicts with operation of business and employment. Considers this a penalisation and seeks compensation if the designation remains.
- Requests smaller, strategically positioned parks or a new north-south linear park as an alternative (illustrated below).
- Noted that the area benefits from existing green/open spaces. Noted that amenities in Tolka Valley park could be improved.
- Roof top amenity spaces suggested.
- Seeks a new pedestrian/cyclist crossing over the Royal Canal which would connect Broombridge Luas, and rail stops further supporting higher densities and more sustainable development.



Figure 3.3: New linear park proposed to link Canal with Tolka Valley Park. (Source: Extract from Figure 3.7 of the Draft Masterplan, annotated and altered by TPA, 2025.)

Redlock Ltd

- A linear park near Boyne Road, linking Tolka Valley Park/Ballyboggan Road with the Royal Canal is sought.
- Pedestrian/cycle bridge linking to Tolka Valley Park suggested as an option.
- Stated that a small under/over-ground pedestrian-cycle bridge could be used if there is a need to retain Lagan Road for vehicular traffic.
- A pedestrian-cycle bridge could be created from the north side of the canal to the Luas-Railway station link as an exclusively pedestrian-cycle alternative to the existing vehicular bridge on Broombridge Road.
- Considered the park on Slaney Road will have limited functionality due to its small size.
- It is comprised of 3 current properties. But these 3 properties affect over 23 separate businesses that have a total of over 200 employees.

Propmaster Ventures Limited

- Requests that the sub-divisions of development parcels into plots should be identified as indicative.

Blacklion Real Estate Fund

- Requested that figure 3.9 is updated to remove or revise the indicated “existing/improved local route” adjacent to 129 Slaney Road and Lidl at 130 Slaney Road stating that no such access currently exists at the given location and Lidl’s permission under Reg. Ref: 3903/21 extends development up to the site boundary.
- Issue is raised with Royal Canal Linear Park at unit 69 Moyle Road, it is stated the proposed green corridor setback at this location is excessive, this is compared to neighbouring parcels and therefore is considered disproportionate.
- With reference to unit 69 Moyle Road, the submission seeks a maximum set back of 10 meters from the Royal Canal bank. Open space provision is considered disproportionate compared with neighbouring properties. Updates to the Masterplan clarifying the land take and set-back are requested.
- Considered that the linear park should be further guided by Royal Canal Green Way Part 8 scheme.
- Unclear how the proposed permeability route extending eastwards through unit 68 on Moyle Road will be treated in density calculations and how this will impact development potential. The following amendment is sought:

“Where land is required to deliver a local route or permeability objective and is transferred to the public realm or taken in charge, such land may continue to be included in the gross site area for the purposes of residential density calculations, provided that the development proposal demonstrates alignment with the Masterplan objectives and maintains a high-quality urban design response.”

- Additional height or set-back upper floors is sought in locations identified to provide permeability routes to offset land take and to enhance legibility and wayfinding.
- Requests that the amenity corridor along Broombridge Road be aligned with the Luas Finglas Railway Order landscape buffer, noting that the land take is considered excessive.
- Seeks clarification regarding the width of set-backs, with the removal of unnecessary set-backs.

Ballybunion Glen Limited

- Community Grade 1 Park should align with the approved landscape and public realm of Luas Finglas.
- Considered that the amenity corridor along Broombridge Road is excessive and does not correspond with Luas Finglas.
- Clarity is sought as to the land take required to facilitate the Royal Canal Linear Park, suggesting a 10 metre set-back.
- Consistency with Part 8 Greenway is sought.

Prevalent Investments Ltd

- A new Specific Objective is sought:
“The Royal Canal Linear Park is a ‘Fixed’ element of the Masterplan, critical to the successful delivery of a key principle of the Masterplan. The width of Linear Park is a ‘Flexible’ element that can be agreed on a plot or development parcel basis subject to achieving a minimum width of 15m from the building line addressing the linear park to the edge of the canal. This 15m corridor will accommodate the Royal Canal Greenway Scheme (Phibsborough to Ashtown) (minimum 5.5 m) and public realm between the edge of the Greenway and the building line. The space between the edge of the Greenway and the building line will be guided by a public realm and landscaping scheme to provide for a consistency of treatment within the space that will accommodate active ground floor uses including cafes Green Rooms, active or

passive public open space, or landscaping within communal open space areas associated with apartment blocks addressing the canal.”

- Amended text is proposed regarding public open space on page 15 (new text in green).

The public open space network includes:

*The development of a linear park along the Royal Canal, to include the provision of cycling and walking corridors in addition to riparian vegetation to support biodiversity. This corridor shall also include ‘green rooms’ to facilitate a variety of passive and active recreational uses while animating the canal edge. **Active ground floor uses along the canal frontage such as café, restaurant and other related uses will be supported and encouraged.***

Community groups, sports clubs, health and education

The overall approach of the draft Masterplan regarding open and amenity space, including the provision of walking and cycling routes is generally welcomed by a number of sports and community groups operating within the area. However, the provision and requirement for dedicated sports facilities is noted. This matter will be comprehensively addressed under section 2.3.5 Land Use and Function.

Chief Executive’s Response

Urban Structure and Movement

The Chief Executive welcomes the general support expressed for the urban structure set out in the draft Masterplan. A robust urban structure is essential in establishing a framework to support redevelopment opportunities, while ensuring that an overall cohesive vision is achieved for the lands. By utilising the existing street network, landownership boundaries are generally acknowledged, which supports regeneration opportunities across the lands. The challenges regarding the delivery of the finer urban structure and other infrastructure as part of redevelopment proposals are noted and it is acknowledged that this will require collaboration across landownership boundaries. This is a common feature in brownfield urban regeneration, which is exacerbated further here due to the high number of individual owners and businesses. This will be addressed further in subsequent sections of this report.

The Chief Executive acknowledges that concerns and queries have been raised regarding the stated fixed, flexible and indicative elements illustrated in the draft Masterplan, including the urban structure and in particular local streets/filtered permeability and amenity routes. Requests for enhanced flexibility are noted. Specific site requests from various landowners or businesses are acknowledged and have been considered.

It is imperative that certain elements are considered ‘fixed’ in accordance with the definition set out in Chapter 1 of the draft Masterplan. This is to ensure that a cohesive and sustainable urban structure and form is delivered, which will be subject to minor variation only (to be agreed with the Planning Authority). Identified ‘fixed’ elements are intended to provide certainty to landowners and the public to guide the long-term regeneration of this strategic land bank and to support state investment in public transportation. Having regard to the strategic nature of the draft Masterplan and the complex nature of brownfield urban regeneration, it is considered appropriate that certain elements contained in the draft Masterplan are identified as ‘flexible’. Flexibility in this context still requires any deviation to adhere to the overall design principles and urban structure set out and not be compromised, but allows for some deviation, based on a detailed design of a given site or landholding. If any deviation is permitted, this will not compromise the overall strategic objectives envisaged in the draft Masterplan.

Having regard to various specific requests for enhanced flexibility involving proposed local/filtered streets and amenity routes, page 12 of the draft Masterplan states ‘unless

expressly identified, the urban structure is considered to be fixed, in accordance with the definition outlined in Chapter 1...’ Furthermore, page 16 ‘Street and Movement Hierarchy’ states: **‘While the overall urban structure is fixed, a degree of flexibility will be accepted for new filtered streets within the development parcels, as long as the overall objectives and permeability outcomes can be achieved’**. Specific Design Objective 9 – Proposed local streets (filtered permeability) states **‘the precise location of these streets is flexible in accordance with the definition set out in Chapter 1, as long as the overall design objectives can be achieved.’**

Therefore, in the context of various requests to make minor alterations to local access streets to take account of current landownership or site-specific matters, considering the flexibility permitted in the Masterplan it is considered that the matter is substantively addressed in the text of the draft Masterplan. It is considered that amendments to the legend in figure 3.5 be included along with associated clarifying text, which aligns with the above, in the interest of enhancing clarity.

In response to requests to amend text to provide enhanced clarity for amenity routes within development parcels, Specific Design Objective 4 – parcel-based open space states: **‘The identified passive and linear open spaces within individual development parcels is fixed to ensure that sufficient usable, multi-function and connected amenity space is provided to serve neighbourhoods. Deviations may be considered as part of considered design proposals as long as the overall design objectives can be demonstrated as part of a parcel-based masterplan prepared by applicants to accompany development proposals.’** (Bold text for emphasis). It is considered that the matter is substantively addressed in the text of the draft Masterplan.

It is considered reasonable to update figure 3.9 in response to Blacklion Real Estate, who identified a mapping discrepancy regarding the incorrect identification of an ‘existing/improved local route’ adjacent to 129 Slaney Road and Lidl at 130 Slaney Road. Figure 3.9 will be amended accordingly.

Requests for a new pedestrian/cycle bridge over the Royal Canal to connect with Broombridge interchange are noted. The Chief Executive supports the future provision of a new bridge over the Royal Canal. In this context, it is noted that this was explored by TII as part of preparation for the Luas Finglas Railway Order. In response to the submission from the NTA, the text of the Masterplan will be amended to include support for a future walking/cycling bridge over the Royal Canal, following consultation and agreement with all stakeholders and subject to environmental considerations.

It is clarified that the illustrated amenity route along Broombridge Road shown in figures 3.6, 3.7 and 3.9 is illustrative and relative to the Finglas Luas project and as such does not pose a conflict. The Masterplan supports Luas Finglas and associated public realm upgrades along the route.

In response to submissions which suggested that the draft Masterplan be amended to include an enhanced level of detail regarding some proposed streets or walking/cycling routes, it is considered that the draft Masterplan sufficiently sets out the strategic approach that will be required. Such proposals will be subject to detailed design and be required to seek consent.

In response to the suggestion by Marie Sherlock TD to provide an additional access route to provide safe access to the proposed school site, it is noted that the identified site is bound by the existing road network. Enhanced pedestrian access to Ballyboggan Road is proposed to the north east of the site, in addition to a proposed amenity/pedestrian route, linking the site to Broombridge transport interchange. Furthermore, a proposed secondary route linking

Ballyboggan Road and Lagan Road is illustrated, specifically noting the requirement to provide safer routes to school (page 16). It is considered this matter is adequately addressed in the Masterplan and no changes are recommended.

Some submissions relate to future permeability or connectivity to adjacent residential developments. While permeability may be encouraged and supported in some instances, the draft Masterplan does not prohibit the consideration of future connections. Projects will be subject to planning consent.

Matters relating to the inclusion or exclusion of streets or amenity spaces from the calculation of net residential density at planning application stage or upon transfer or taken in charge are not matters for this Masterplan. Appendix B of Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities sets out a methodology for calculating net residential area, which would be assessed as part of detailed design proposals. As such, the request from Blacklion Real Estate Fund to include additional text on this matter is not considered appropriate.

Public transport capacity, including matters involving the railway order for Luas Finglas are not matters for this Masterplan.

Public Open Space

While concerns regarding the location, scale and nature of the proposed Community Grade 1 Parks are acknowledged, the Chief Executive emphasises that the provision of high quality and usable open space, to include parks, is imperative in shaping a place and providing necessary amenities for future residents and users. While some submissions have requested a reduction in open space and a more equal distribution amongst all land owners, such an approach is not considered in keeping with the core principles of the Masterplan. It is imperative that the Masterplan facilitates key areas of open space that are of sufficient scale to provide amenity and recreation. One of the key purposes of proposing a Masterplan is to ensure that infrastructural elements required to sustain a new neighbourhood are clearly identified and ear marked from the outset. In this context, the location of public open spaces was based on an urban design analysis, which considered the location of neighbourhood centres, existing streets/roads and uses to include the identified school/community site. The Dublin City Development Plan requires a minimum of 10% of public open space. Objective GIO22 supports the implementation of the Dublin City Parks Strategy. Compact growth and brownfield urban regeneration proximate to existing and proposed public transportation presumes the delivery of higher residential densities. This necessitates the need for public open space and enhanced public realm to support future communities and great successful places. Dublin City Council's Parks, Biodiversity and Landscape Services Department advised on the future requirements for open space in the Masterplan, which included two Grade 1 Community Parks. This requirement considered the nature of the anticipated development and the expected population. These parks have specific requirements, including land take, to cater for a range of uses and design responses. While counter proposals for smaller networks of open spaces, including a proposed north-south linear park in the vicinity of Boyne Road are noted, based on the professional advice of both the Parks and Planning Departments, the Chief Executive does not consider that these proposals constitute a realistic alternative. It is not considered appropriate to amend the Masterplan to reduce or to relocate the two Grade 1 Community Parks.

Concerns regarding uncertainty and lack of clarity regarding the proposed Royal Canal Linear Park are noted. The Urban Framework presented in this Masterplan does not constitute a detailed design response. Further assessments and detailed design will be required to refine specific land takes. The submissions from the Department of Housing, Local Government and Heritage supported the approach, to allow for the protection of

riparian vegetation and biodiversity along the Canal, while providing an enhanced amenity value. Requests from a number of landowners, businesses and commercial interests for the inclusion of a specified width for the proposed linear park are noted, including the request for a new/amended Specific Design Objective from Prevalent Investments Ltd. In this context, requests for minimum set-back widths of between 10-15 metres are not suitable for achieving the design intent of the Masterplan and would not constitute a linear park as envisaged. The proposed linear park acknowledges the proposed Royal Canal Greenway. This is an active travel project. The proposed linear park enhances the amenity value in this location, providing a series of linear and passive spaces, with opportunities for creative design responses. As illustrated, and as considered in the Strategic Environmental Assessment, separation distances from the Royal Canal extend from 62 metres at the longest distance towards the middle of the plan, to 30 metres to the eastern part of the plan, where a narrow stretch of towpath is formed as a result of the railway line. It is however accepted that varied widths may be acceptable and, subject to the implementation option pursued, and satisfaction with Dublin City Council's Parks, Biodiversity and Landscape Services Department, this may be addressed as part of individual development proposals and based on site specific circumstances.

Notwithstanding the above, it is accepted that enhanced clarity is reasonable, to provide clear indications and expectations required to implement and deliver this linear park. The Masterplan will be amended to include additional text in Chapter 4: Urban Form and Design, Placeshaping, Royal Canal, page 23.

It is clarified that the retention of Reilly's Community Garden is supported by the Masterplan.

The request from Prevalent Investments Ltd regarding new text in relation to active ground floor uses along canal frontages is noted. It is considered reasonable to amend the text of the Masterplan in Chapter 4: Urban Form and Design, Placeshaping, Royal Canal, page 23.

While Specific Design Objective 2 of the Masterplan states that Dublin City Council will actively explore options for implementation and delivery, it is accepted that sections of the Linear Park can be delivered in a phased manner, in tandem with individual proposals.

While matters regarding semi-private open space within individual development parcels, including roof gardens are noted, these requirements and matters will be assessed as part of individual proposals in accordance with the standards of the Development Plan. The Urban Framework predominantly addresses strategic public open space requirements. Flexibility within urban blocks and development parcels is permitted and encouraged. Reference is also made to Specific Design Objective 4, which clarifies this matter.

Chief Executive's Recommendation

The draft Masterplan will be amended to include the following text.

AMENDMENT 12

Chapter 3: Urban Structure

Developing the Urban Structure – Parcels and Plots

Paragraph two

Amendment

While some parcels are greater than 100m in width, the strategy has identified opportunities to sub-divide parcels into smaller plots, while introducing permeability and facilitating the delivery of a finer urban grain. Fine urban grain is fundamental in facilitating diverse urban and residential areas by encouraging active ground floors, diversity in land uses and discouraging monotonous building forms. As such, the urban blocks shall generally be between 60m-80m in width/length but shall not be more than 100m in width/length to ensure that an optimal level of permeability is achieved at an appropriate scale. [The precise](#)

boundary between plots or local streets is flexible in accordance with the definition set out in Chapter 1, as long as the overall design objectives can be achieved.}

AMENDMENT 13

Chapter 3: Urban Structure

Developing the Urban Structure – Parcels and Plots

Figure 3.5: Parcels and Plots

Amendment

Amend figure 3.5 to correspond with the changes proposed to the boundary between development parcels D10 and D11 in figure 6.1.

Amend the legend.

Sub-division of parcels into plots {flexible}

AMENDMENT 14

Chapter 3: Urban Structure

Street and Movement Hierarchy

Figure 3.9

Amendment

Delete (~~'Existing/improved local route' adjacent to 129 Slaney Road and Lidl at 130 Slaney Road.~~)

Replace with {'Proposed local route'}

AMENDMENT 3

Chapter 3: Urban Structure

Street and Movement Hierarchy

Page: 16

Last paragraph

Amendment

Strategic pedestrian/cycle amenity links through the area are provided via a proposed amenity route and also along the Royal Canal corridor. This will maximise connectivity between transport interchanges and link the Quaternion/Broombridge urban village to the Slaney Road neighbourhood centre further east. {Dublin City Council supports the provision of a new pedestrian/cycle bridge across the Royal Canal and railway, and will carry out a feasibility assessment in relation to potential designs and funding options in consultation with the NTA and subject to environmental requirements.}

Existing junctions will be monitored as the plan is implemented to ensure they are appropriately designed to facilitate increased pedestrian and cycle movements.

2.3.4 Urban Form & Design

Summary

Elected representatives

A submission from Marie Sherlock TD notes that concerns expressed from residents regarding height and potential overshadowing need to be addressed. The submission supports greater height and density in areas not adjacent to existing residential areas.

Residents and members of the public

A significant number of the submissions received from residents or members of the public have raised strong objections to the anticipated development capacity and density expected, with suggestions that the draft Masterplan fails to maximise the potential of this strategic and well-connected site in proximity to existing and planning public transportation. Many submissions acknowledge the shortage of housing in Dublin and claim that the draft Masterplan fails to address this by facilitating low density housing at the expense of maximising development yield. Several submissions claim that the draft Masterplan falls considerably short of the net residential density requirements of between 100-250 uph as set out in the Dublin City Development Plan 2022-2028. Others reference the requirements of Sustainable Residential Development and Compact Settlement Guidelines (2024) and suggest that the draft does not adhere to these standards. Some submissions call for increased residential density, with one suggesting that between 250-400 uph as an appropriate target. While a variety of calculations are set out in submissions, the majority of these submissions base this off gross densities for the entire Masterplan lands, with some suggesting densities as low as 77 uph.

A number of submissions are supportive of the density and development capacity anticipated in the draft Masterplan.

A number of the submissions received from residents or members of the public have raised objections to the proposed heights indicated in the draft Masterplan. The majority of these objections suggest that the heights are inadequate to achieve sustainable densities having regard to the areas location proximate to Broombridge transport interchange. A number of suggestions for increasing heights are put forward, with some suggesting increases to 10-20 storeys as appropriate, particularly towards the centre of the site or fronting Tolka Valley Park. Many comparisons were made to other high-density developments like the Glass Bottle Site and Sandyford Central. Some submissions mentioned the need to abandon prescribed heights for the Masterplan and one suggested a strategy based on tall building areas.

Multiple submissions from local residents expressed concerns that the indicated heights are excessive and would be overbearing on established residential areas. Some advocated for lower building heights along the boundaries of established communities of Glasnevin Court and Claremont Court. One submission raised the issue of the overbearing height of the 8th Lock development and requested lower heights along segments of the Royal Canal. Reference was made to the granted redevelopment proposal at Rivermount Cottages.

The importance of creating active street frontages, public spaces and amenities was also raised by some, with calls for detailed uses to be specified for such spaces.

Landowners, businesses and commercial interests

The majority of the submissions from landowners and businesses are critical of the height and density proposed in the Masterplan. A significant number raised concerns that the density set out is contrary to the National Planning Framework, the Regional Spatial and Economic Strategy and to the Sustainable Residential Development and Compact Settlement Guidelines (2024). It is also suggested that the draft Masterplan is contrary to the

provisions of the Dublin City Development Plan 2022-2028 with regards to net residential densities and to height.

In relation to development capacity and density, numerous calculations were put forward, the majority of which were based on gross residential density of the entire plan area. Some attempted to calculate net residential density.

A number of submissions felt that the restrictions imposed by the height, the density and the land take for social and community infrastructure would make any future schemes or relocations unviable. In addition to requests to increase height throughout, several requests for landmark buildings at a scale generally consistent with the 8th Lock development were set out. Additionally, increased height along the canal was requested, with some noting topographic variances throughout the site.

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

Several submissions sought changes to the requirement for parcel level masterplans, with many criticising this, citing challenges relating to landownership. Some requested that sub-parcel masterplans be considered.

The following site-specific requests were made:

Kimpton Vale Limited

- It is suggested that the draft Masterplan has a net residential density of 122 uph, which is considered inappropriate.
- Flexibility is requested regarding densities, including densities in excess of 250 uph.
- Heights in the range of 6-10 storeys requested.
- Seeks amendments to figure 4.2 to include an annotation for amplified height on the western corner of site.
- Seeks recognition of sub-parcels and independent masterplans.

Woodberry Packaging Limited, Operator of Colorman (Ireland) Ltd

- It is suggested that the draft Masterplan has a density of 122 uph. It is considered that this is insufficient compared to other areas such as Jamestown. Flexibility is requested to exceed 250 uph.
- The submission seeks 6-9 storeys as a minimum with 9+ storeys on prominent corners, especially near the Broombridge Interchange.
- A landmark building designation is sought at the Colorman site having regard to its strategic location.
- The following text changes are sought:
*The provision of an existing transport interchange at Broombridge and proposals for BusConnects, Dart+ West and Luas Finglas support a compact form of development. As such considering the **highly** accessible location for this urban extension, it is considered net density in the range of 100-250 units per hectare as set out for Strategic Development and Regeneration Areas (SDRAs) ~~may be considered~~ **will be encouraged.***

In accordance with the provisions of the Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024), highest densities should be applied within a 250 meter radius of Broombridge Interchange and should gradually decrease by distance. Densities above the

range set out above will be considered on a case-by-case basis, subject to detailed design and the development management process.

*Having regard to the sustainable density anticipated on the site and to the urban structure form and land use mix as set out in the masterplan, it is anticipated that **a minimum of 6,000 homes** can be provided.*

- Requests that podium level be replaced with a courtyard configuration to facilitate additional built form.
- Seeks recognition of sub-parcels and independent masterplans.

Downshire Propco Limited

- It is suggested that the draft Masterplan has a density of 122 uph. Flexibility is sought to exceed 250 uph, particularly within 250 m of a transport interchange.
- It is requested that heights in the range of 6-9 storeys be implemented with 9+ storeys on prominent corners.
- The following text changes are sought:
*The provision of an existing transport interchange at Broombridge and proposals for BusConnects, Dart+ West and Luas Finglas support a compact form of development. As such considering the **highly** accessible location for this urban extension, it is considered net density in the range of 100-250 units per hectare as set out for Strategic Development and Regeneration Areas (SDRAs) **may be considered will be encouraged.***

In accordance with the provisions of the Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024), highest densities should be applied within a 250 meter radius of Broombridge Interchange and should gradually decrease by distance. Densities above the range set out above will be considered on a case-by-case basis, subject to detailed design and the development management process.

*Having regard to the sustainable density anticipated on the site and to the urban structure form and land use mix as set out in the masterplan, it is anticipated that **a minimum of 6,000 homes** can be provided.*

- General concerns raised with the block layout. A u-shaped block is sought as it is claimed that the l-shaped block illustrated is not appropriate for delivering the required density.
- Seeks sub-parcel recognition and independent masterplans.

Flynn Group

- The submission includes a revised block layout and urban form. The provision of individual blocks to breakdown the massing within the wider parcel and provide enhanced connectivity from the Royal Canal and Development Parcel D5 located to the south of the site to the community park.
- The submission seeks height increased in the range of 6-8 storeys for development parcel D6.
- An appropriate landmark building between c. 10-12 storeys is sought at western end of the revised layout sought. This landmark building would improve the wayfinding and legibility of the community park.
- Suggested that this can achieve densities of 250 uph within the development parcel.

United Ireland 2023 Propco Limited

- Suggested that the net residential density of the Masterplan is between 104-130 uph. Noting the national guidelines, a density of 215 uph is sought as an appropriate mid-point in the range.
- Increased heights are sought with enhanced flexibility.

Bartra Property Limited

- Suggested that the Masterplan has a density of between 104-130 uph and that the development capacity of 6,000 units is insufficient.
- A density of 215 uph (mid-upper range) is sought, which is suggested will be capable of yielding 9,933-12,416 units.
- Suggests that the Masterplan is incompatible with the height strategy set out in the Development Plan, which supports 5-8 storeys.
- Additional height sought throughout, but particularly towards the east of the site adjacent to Claremont Court and along the Royal Canal.

Fridge Spares Ltd.

- Multiple properties with established businesses and no plans to relocate.
- Clarity sought regarding the anticipated development capacity.
- Additional height is sought throughout to enable the required density to be achieved.
- Additional height sought in the lower scale areas from 3-4 to 3-6.
- Height increase sought around proposed green spaces to 6-8 storeys.
- Final building height can be determined during planning application stage.

Propmaster Ventures Limited

- Suggested that the draft Masterplan density is 80 uph.
- Greater height sought especially along the northern frontage which will be adjacent to proposed commercial units and also adjacent to the Community Grade 1 Park.
- Requested that the site is recognised as having potential for taller buildings and designated for amplified height/corner feature, due to centrality and adjacency to a large park and school.

Blacklion Real Estate Fund

- A number of separate submissions received relate to specific properties or groups of properties. While height increases are sought throughout in the range of 6-8+ storeys, site specific issues include:
 - Unit 5 Slaney Road, increase of height from 3-4 storeys to 5-6 storeys with amplified height potential.
 - Unit 1 Slaney Road, increase of height from 3-4 storeys (adjacent to green space) to 5-6 storeys
 - 129 Slaney Road & 134/136a&b Slaney Close, multiple sites capable of handling increased height. These sites are designated as 4-5 & 5-6 storeys it is proposed to increase height 6-8+ storeys.
 - 47 and 50 Nore Road, seeks raising heights to 4-6+ storeys including the allowance for amplified heights (6-8+ storeys) on the corner facing the proposed park.
- Request that the Masterplan be revised to provide a strong urban edge (6-8 storeys) along the frontage with Finglas Road, with open space more appropriately located within perimeter blocks, as already illustrated elsewhere in the framework, as illustrated below.

Figure 4.5: Requested amendments to Fig 4.1 to provide urban edge to Finglas Road (approximate location of sites outlined in red for information purposes only)



- The submission seeks a more flexible, site-specific approach to podium design which is expected to be aligned with the realities of phased delivery and ownership patterns. The submission proposes the below amendment to the Draft Masterplan:

“Where podium structures are proposed within the Urban Framework, these may be delivered as coordinated but independent podiums, developed at a parcel or site level, provided they adhere to common design principles (e.g., interface with public realm, scale, permeability, servicing, and structural integrity). Podium integration across land parcels may be desirable but shall not be mandatory where ownership constraints or delivery issues arise.”

- Seeks amendment to Specific Design Objective 8 to allow for more flexible approaches to parcel level masterplans. Considers a requirement for full landowner engagement to be unrealistic.
“Where full agreement among landowners within a parcel is not achievable at the time of application, the Planning Authority may accept a standalone or phased parcel masterplan, provided it:
Demonstrates satisfactory engagement with other landowners; -Aligns with the overarching masterplan objectives; -Contains a coherent spatial and infrastructural strategy for the applicant's lands; and ensures the delivery and integration of critical shared infrastructure (e.g. roads, open space, SuDS) in a manner that does not prejudice adjoining lands or future phases.”

Ballybunion Glen Limited

- Requests that the Glen Industrial Estate should be identified as suitable for heights in the range of 6-8+ storeys, along the eastern and northern edge.
- Additional heights along the Royal Canal are sought, with increases from 3-4 to 4-6+.
- Revised wording to Specific Design Objective 8 sought:

“Where full agreement among landowners within a parcel is not achievable at the time of application, or where the viability of preparing a masterplan for the full parcel is not reasonably proportionate to the scale of the envisaged planning application, the Planning Authority may accept a standalone or phased parcel masterplan, provided it:

- *Demonstrates satisfactory engagement with other landowners;*
- *Aligns with the overarching masterplan objectives;*
- *Contains a coherent spatial and infrastructural strategy for the applicant's lands; and*
- *Ensures the delivery and integration of critical shared infrastructure (e.g. roads, open space, SuDS) in a manner that does not prejudice adjoining lands or future phases.”*

Prevalent Investments Ltd

- Seeks amendments to figure 4.1 to include building heights of 6-8 storeys on their site.
- Seeks additional height fronting the canal, subject to the criteria set out in the Development Plan.
- Requests amendments to paragraphs 4 and 5 on page 21 under the heading 'Building Height' (new text in red):

*"In general, building heights in the range of 3-4 **6-8 storeys** will be encouraged to provide a coherent street structure, with an appropriate sense of enclosure, while supporting a range of housing typologies and uses. Locations identified for additional height over this range broadly correspond with the two neighbourhood centres **and the canal frontage** to assist in reinforcing urban function and aiding legibility. Opportunities also exist for amplified height at prominent corners and to address public open space, **especially where such public open space is provided along the canal frontage to aid in the delivery of the Royal Canal Linear Park** in order to enhance the overall urban structure in a coherent way and to provide a variety in height across the Masterplan. These opportunities may correspond with prominent corners, can act to punctuate vistas, or can serve as design features for character and legibility, but shall not apply to the overall block. **All proposals for greater height than indicated in Fig. 4.2 (Height Strategy) must demonstrate compliance with the performance-based criteria set out in Table 3 of Appendix 3 of the City Development Plan.**"*

- Text updates are requested under the heading 'Placemaking' on page 23 of the Masterplan under headings 1 and 2 titled 'Quaternion/Broombridge urban village' and 'Royal Canal', respectively, relating to land use and ground floor frontages. These changes reflect changes sought to Urban Structure.
- Seeks amendment to Specific Design Objective 8:

*"In order to ensure that a coordinated approach is taken to the delivery of public open space, surface water drainage, community and social infrastructure, the first application(s) within individual development parcels will be required to produce a detailed parcel-based masterplan to accompany planning applications. Where possible, it is the preference of the planning authority that such masterplans should be prepared and agreed with the approval of all landowners within parcels. However, it is accepted that this is not always possible and can present challenges. Therefore, the planning authority may accept a parcel-based masterplan as part of a planning application, if it is satisfied that: **the applicant has made reasonable endeavours to engage with all other landowners within the development parcel** an acceptable level of consultation between landowners has taken place; that an appropriate and reasoned spatial response is set out; and that the masterplan complies with this Masterplan.*

Community groups, sports clubs, health and education

While the submissions received from various community and sports groups and organisations will be addressed in more detail in Land Use and Form, some of the issues raised relate to parcel-level masterplans and engagement. Pirates Studio wish to be involved in parcel level masterplanning. Submissions from Sankalpa CLG and The Redeemed Christian Church of God Open Heavens Dublin (RCCG OHD) both state their intentions to remain in the area and have expressed their intentions for future engagement.

Chief Executive’s Response

Development capacity and density

The Chief Executive emphasises that the Masterplan represents an urban design led and evidence-based approach to the regeneration and balanced densification of this strategic landbank, capitalising on the significant state investment in public transport to include DART+ West, Luas Finglas and BusConnects, in accordance with national and regional policy relating to compact and sustainable growth. In addition to facilitating new homes and supporting existing and future jobs, the Masterplan is underpinned by exemplary urban design principles that fully integrate existing amenities to include the Broombridge transport interchange and the Royal Canal corridor. The Masterplan is fully aligned with the Transport Strategy for the Greater Dublin Area 2022-2042 and the principles of Transport Orientated Development.

Chapter 1 of the draft Masterplan clearly states that it is not the intention that the Masterplan repeat the policies, objectives and standards of the operational Development Plan, through which all development proposals are assessed. In this context, the net residential density ranges set out in the Development Plan for Strategic Development and Regeneration Areas (SDRAs) are between 100-250 units per hectare. Densities in this range fully align with the Sustainable Residential Development and Compact Settlement Guidelines (2024) (the Guidelines). The calculation of development capacity is based on Appendix B (Measuring Residential Density) of the Guidelines and based on an approximate land use mix of 3:1 residential to commercial/enterprise/community uses. It is also emphasised in the Masterplan that this is an anticipated approximate yield.

Having regard to the clarity sought by a significant number of submissions, the Chief Executive accepts that clarity is required in the Masterplan regarding the following:

- The net residential area of the Masterplan lands
- The application of the appropriate density range

While the gross area of the Masterplan constitutes 77 hectares of land, the stated development capacity and urban framework prepared relates to 45.5 hectares of land currently zoned Z6 (Employment/Enterprise).

It is emphasised that while the gross area of the Masterplan constitutes 77 hectares of land, 66 hectares of this is zoned and a further 10 hectares undevelopable. This includes existing railway and Luas lines, stations, public realm, depots and associated infrastructure required to support existing and proposed public transport, including Luas Finglas and DART+ West. It also includes lands zoned Z9 (Amenity/Open Space Lands/Green Network) and Z11 (Waterways Protection) along the Royal Canal Corridor pNHA. Limited infill and consolidation opportunities exist along Bannow Road. Such capacity is included in the existing Core Strategy of the Development Plan. Full details are included in the table below.

Table 6: Development area

Description	Area
Gross area of Masterplan lands	77 ha
Area of zoned land within the Masterplan	66 ha
Area of land zoned Z9 (Amenity/Open Space Lands/Green Network) and Z11 (Waterways Protection), excluded from the calculation of development capacity.	6.1 ha
Additional zoned land excluded from the calculation of development capacity due to constraints, to include railway and Luas tracks / corridors, stations, depot and associated infrastructure, including current and future requirements as part of Luas Finglas and DART+ West.	4.2 ha

Existing Educational uses: TU Dublin Sports Campus, Broombridge Educate Together National School	3.8 ha
Z1 lands to north east of Masterplan, containing established residential development	1.24 ha
Lands south of Broombridge interchange on Bannow Road	5.16 ha
Area of the lands subject to land use zoning Z6 (Employment/Enterprise), which is subject to the Urban Framework and forthcoming variation to the Dublin City Development Plan 2022-2028.	45.5 ha

The development potential largely relates to **45.5 hectares** of lands zoned Z6 (Employment/Enterprise), situated north of the Royal Canal. In order to implement the Masterplan, this land will be subject to a forthcoming variation of the Development Plan which proposes re-zoning the land to Z14 (Strategic Development and Regeneration Area). The Urban Framework prepared relates to these lands. The calculated net residential area of this land is **28 hectares**. The net residential area excludes non-residential uses such as the reserved school site, commercial, community and primary open spaces. This was calculated having regard to Appendix B (Measuring Residential Density) of the Sustainable Residential Development and Compact Settlement Guidelines (2024). See table below.

Table 7: Net residential area

Description	Area
Area of the lands subject to land use zoning Z6 (Employment/Enterprise)	45.5 ha
Reserved site for schools	2 ha
Linear Park & Community Grade 1 Parks	6 ha
Net residential at 75%/25% land use mix	28 ha

The Development Plan states that net residential densities in the range of 100-250 uph will be supported as a general rule for SDRAs. There is a general presumption against schemes in excess of 300 units per hectare. Research¹ has shown that very high density can challenge positive responses to context, successful placemaking and liveability aspirations, sometimes resulting in poor quality development. Schemes in excess of this density will be only considered in exceptional circumstances where a compelling architectural and urban design rationale has been presented. An application of the prescribed net residential density ranges for SDRAs as set out in the Development Plan to the net residential area is provided in the table below.

Table 8: Net residential density

Net residential area	Dublin City Development Plan 2022-2028 net density range for SDRAs 100-250 uph	Residential Development Capacity
28 ha	100 uph	2,800 units
28 ha	250 uph	7,000 units
28 ha	Assuming deviation +/- 15%	6,087 units, +/- 15%

While the Development Plan sets a broad range between 100-250 uph for SDRAs, there is a presumption in the Masterplan that densities **in excess of 200 uph** are achievable and appropriate, subject to site specific constraints and considerations. It is also prudent to note that not all sites will be capable of achieving 250 uph. By assuming a +/- 15% to account for variability regarding site constraints, uses and design responses, an anticipated residential development capacity of **6,087 units, +/- 15% is expected**. It is also stressed that the Development Plan permits densities in excess of 250 uph but generally below 300 uph, subject to amenity safeguards.

¹ Superdensity The Sequel, HTA, PTE, 2015.

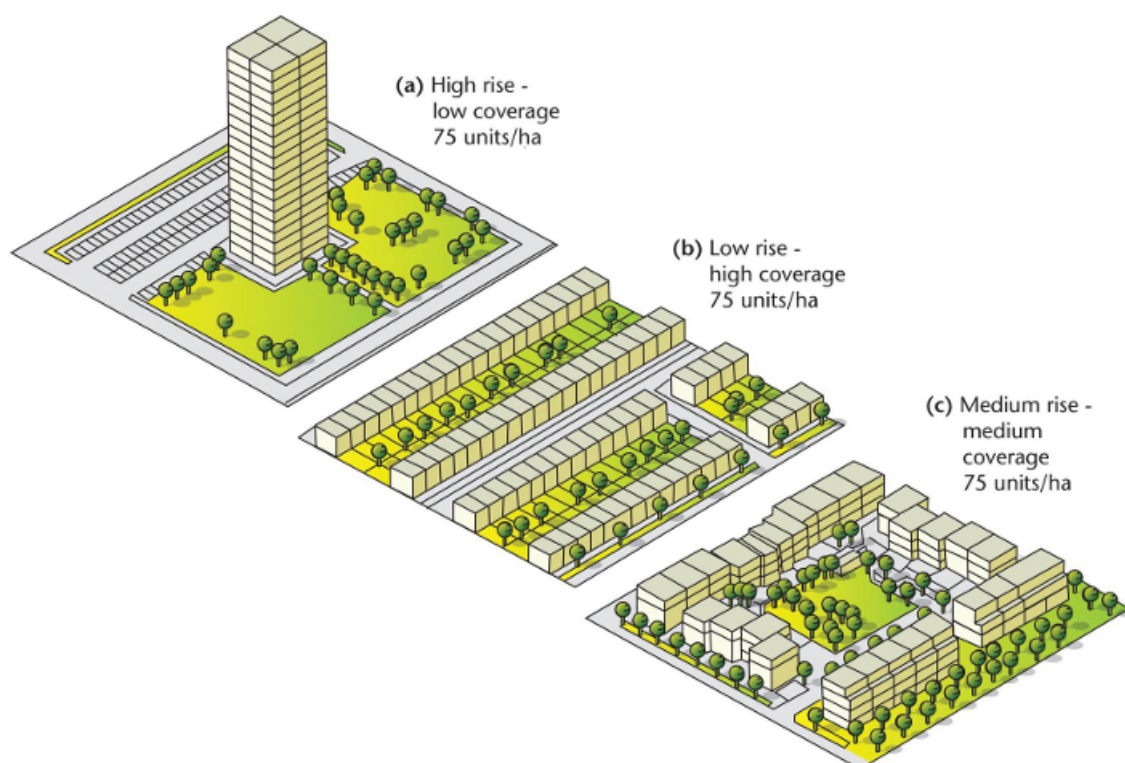
Development capacity at a policy level is based on applying a number of strategic assumptions. It is not to be interpreted as a target or ceiling and is intended to ensure that adequate infrastructure is provided and planned for and that strategic lands are developed at an appropriate scale.

The Chief Executive is of the view that the above provides comprehensive clarity that the Masterplan facilitates an appropriate intensity and scale of development in accordance with national policy and the Development Plan. It is accepted that confusion has arisen regarding the correct application of net densities, along with a lack of clarity regarding the land area of the Z6 industrial lands. The Masterplan will be amended to include clarifying text regarding the lands subject to the Urban Framework and the net residential area. In the interest of clarity, the anticipate capacity of lands outside the industrial estates will be provided.

Height

The Chief Executive notes the significant concerns expressed in relation to the height strategy set out in the draft Masterplan. It is acknowledged that building heights and density are frequently and incorrectly considered a single matter in many submissions. It should be noted that while related, they are not the same. The same net residential density can achieve very different spatial responses and heights, as illustrated in the following diagram.

Figure 1: Indicative applications of height/density



However, it is accepted in this context that the majority of concerns relating to building heights are a result of confusion relating to density/development capacity, as outlined above.

In the first instance, the Chief Executive emphasises that **the built form illustrated in the draft Masterplan achieves the net residential density, development capacity and land use mix set out**, as prescribed by national and Development Plan policy. It is also stressed

that the building heights set out in the draft Masterplan are **baseline**, with variety relating to block size, land use mix, typology and tenure, as set out in the Masterplan. With the exception of a small number of locations identified for reduced height, due to proximity to existing two storey residential dwellings, **the general baseline heights start at 3-4 storeys increasing to 8 storeys (with additional flexibility)**, which is in keeping with best practice and Development Plan policy. It is noted that in Dublin Docklands under the North Lotts and Grand Canal Dock Planning Scheme, densities in the range of 200 to 250 units per hectare are achieved. This is achieved by developing buildings typically 5 to 8 storeys in height. The Chief Executive also emphasises that baseline height was carefully considered in the context of the existing and proposed urban structure. The proposed urban blocks are generally between 60m-80m in width/length and less than 100m. While this is an optimum block size to encourage permeability and the delivery of a fine urban grain, height needs to be considered as part of detailed design proposals, to ensure appropriate residential amenity is achieved. This rationale supported the basis for setting baseline heights.

The Masterplan sits within the operational Development Plan. The Masterplan and the Development Plan, both provide for variety and flexibility at the level of an urban block as part of detailed design proposals, including a requirement for plot-based masterplans. Specifically, the Masterplan states that 'all proposals for additional height will be assessed in accordance with the Development Plan and will be subject to design and amenity safeguards'. It is also noted that an 'additional floor, set-back, or amplified height on selected prominent corners above the ranges set out in figure 4.2 may be considered appropriate as part of a detailed design proposal...'

Notwithstanding this, it is accepted that the strategy caused confusion and was incorrectly perceived to be restricting heights. In contrast, the strategy was intended to enhance variety and tenure to support a diverse community. In order to clarify this position and unequivocally emphasise the scale and intensity of development required on these lands to support sustainable consolidation, it is considered appropriate to **simplify the height strategy**, by amalgamating ranges and providing fewer categories, with refined flexibility at the level of the urban block, but a greater emphasis placed on plot-based masterplans, to respond to detailed design matters such as topography. There is a presumption that the height ranges set out in the draft Masterplan generally relate to residential development and the prevailing street level. However, it is acknowledged that the topography within the lands results in some sites sitting below, or above the prevailing ground level, as noted in some submissions, including concerns raised by residents in adjacent housing estates. As such, heights above or below the general ranges may be considered appropriate in order to achieve a successful urban design response, as part of comprehensive design solutions, and subject to the performance criteria set out in Appendix 3 of the Dublin City Development Plan.

Specific requests for height changes on individual sites/parcels from landowners/business owners are noted, with numerous requests for landmark buildings, or annotations for amplified heights. First, it should be emphasised that it is not considered appropriate to identify a landmark for each site. In the context of the modifications to the height strategy proposed and clarifications to the text, it is considered that the majority of concerns and requests are adequately addressed.

Urban Form

Having regard to queries regarding fixed building lines and set-backs, in particular along the Royal Canal, along with proposed Luas corridor on Broombridge Road and Finglas Road, it is stressed that the draft Masterplan has included fixed building lines to provide for an enhanced pedestrian realm and set-backs to provide for the provision of strategic infrastructure, active travel and open space. In the case of Finglas Road, this is to allow to the delivery of a SuDS feature. This will be subject to detailed designs at project or planning

application stage. Fixed building lines in this context are to ensure the creation of a consistent and coherent urban form, and to ensure that the existing streetscape and amenity is protected and enhanced. In accordance with the definition of 'fixed' set out in Chapter 1, minor variations may be accepted. Therefore, it is not considered that this requirement places an undue burden on any development proposals.

In response to requests to change the configuration of urban blocks or omit illustrated podiums, it is emphasised that the urban block layout in the Urban Framework contains indicative elements, designed to illustrate a general form of development. The Masterplan is considered an essential policy vehicle to the delivery of a sustainable and plan-led urban regeneration of this significant land bank in the context of Dublin City and will be essential in the overall delivery of the objectives set out in the National Planning Framework and Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly. It does not constitute a detailed design proposal. Site specific and detailed design matters can adequately be addressed as part of refined proposals and addressed in the context of parcel level Masterplans. Therefore, no changes are recommended.

Parcel level Masterplans

Requests to modify Specific Design Objective 8 regarding the requirement for parcel level masterplans are noted. A broader recognition of sub-parcels by numerous landowners or businesses is also noted. A Masterplan is a policy document which sets out the urban structure, urban form and land uses to facilitate development opportunities within the lands over an extended period of time. It does not represent a detailed design response to individual development parcels. In order to ensure that a coordinated approach to the delivery of public open space, surface water drainage, community and social infrastructure, a more detailed parcel level masterplan is required to inform detailed proposals. This will ensure that individual sites and proposals can proceed in an appropriate manner. This is particularly important on brownfield industrial lands, where some existing uses are still operating. Requests to allow sub-parcel masterplans is also noted in this context. The preparation of a masterplan that excludes some sites within a parcel would negate the requirement for a masterplan and would not be considered best practice or responsible planning. However, it is acknowledged that in some circumstances expanding a parcel level masterplan beyond the boundary of a given parcel may be warranted having regard to site specific circumstances and if doing so would enhance the understanding and assessment of a given proposal. Issues relating to phasing and development parcels will also be responded to under Implementation.

Notwithstanding the above, it is considered that the wording of Design Objective 8 be amended to include businesses, cultural and community groups, in addition to landowners as part of consultations. This will address concerns raised by community groups and businesses who are leasing spaces and who are keen to remain in the area. Minor amendments to the text will be carried out to clarify requirements for consultation and engagement.

Placeshaping

The request from Prevalent Investments Ltd regarding new text relation to active ground floor uses along canal frontages is noted. It is also noted that a number of clarifications are sought regarding the extent of land to be reserved for the proposed linear park. It is considered reasonable to amend the text of the Masterplan in Chapter 4: Urban Form and Design, Placeshaping, Royal Canal, page 23.

Further to the clarity provided regarding development capacity and the noting of indicative capacity on lands on existing residential lands, it is considered appropriate to clarify that the extant planning permission on lands situated to the north of the site within character area 3 (Slaney Road Neighbourhood Centre) are supported by the provisions of this Masterplan.

Chief Executive's Recommendation

The draft Masterplan will be amended to include the following text.

AMENDMENT 15

Chapter 4: Urban Form & Design

Height

Page: 21

Amendment

~~(The Masterplan sets out the overall range for heights across the lands based on a detailed urban design assessment.~~

~~The height strategy has been devised in relation to the following key principles:~~

- ~~• Enhancing legibility and placemaking.~~
- ~~• Reinforcing urban function.~~
- ~~• Proximity to public transport.~~
- ~~• Topography and natural assets including the Canal and Tolka Valley.~~
- ~~• Respecting existing context and established residential areas.~~

~~Opportunities for locally higher buildings are provided at a new Quaternion/Broombridge urban village addressing the proposed Luas extension, and at a new local neighbourhood centre, situated to the east of the lands close to Finglas Road. This is a design response which is intended to reinforce the urban function and hierarchy of the lands, framing the public realm and introducing vistas through the site. All proposals for additional height will be assessed in accordance with the Development Plan and will be subject to design and amenity safeguards.~~

~~In general, building heights in the range of 3-4 storeys will be encouraged to provide a coherent street structure, with an appropriate sense of enclosure, while supporting a range of housing typologies and uses. Locations identified for additional height over this range broadly correspond with the two neighbourhood centres and assist in reinforcing urban function and aiding legibility.~~

~~Opportunities also exist for amplified height at prominent corners and to address public open space in order to enhance the overall urban structure in a coherent way and to provide a variety in height across the Masterplan. These opportunities may correspond with prominent corners, can act to punctuate vistas, or can serve as design features for character and legibility, but shall not apply to the overall block. This is to avoid the proliferation of monolithic 'slab' blocks. Additional height, where appropriate, should be no more than 1/3 of the overall length/width of the urban block.~~

~~In general, heights should be stepped down on the south of urban blocks to allow adequate daylight and sunlight within blocks/courts.~~

~~An additional floor, set-back, or amplified height on selected prominent corners above the ranges set out in figure 4.2 may be considered appropriate as part of a detailed design proposal, as long as the overall proposal complies with the overarching spatial principles and urban structure established throughout the Masterplan, having regard in particular to the potential impact on existing residential amenity, local height context, the land use function and legibility. In general, this provision will not apply where a proposal is proximate to residential dwellings, where an undue impact on visual or residential amenity would be likely.~~

~~Lower building heights are required adjacent to Claremont Court in order to safeguard the residential amenity of this mature residential area and to provide an appropriate transition to the newer typology of residential and mixed-use development proposed.)~~

{The Urban Framework establishes the baseline height ranges across the lands based on a detailed urban design assessment. The height strategy acknowledges the performance-based criteria set out in Appendix 3 of the Dublin City Development Plan 2022-2028 and has been devised in relation to the following key principles:

- Enhancing legibility and placemaking
- Reinforcing urban function
- Proximity to public transport
- Topography and natural assets including the Canal and Tolka Valley
- Respecting existing context and established residential areas

In general, building heights in the range of 4-6 storeys will be encouraged to provide a coherent street structure, with an appropriate sense of enclosure, while supporting a range of housing typologies and uses. Opportunities for additional height over this range are provided at the Quaternion/Broombridge urban village and at the local neighbourhood centre, situated to the east of the lands. This is a design response which is intended to reinforce the urban function and hierarchy of the lands, framing the public realm and introducing vistas through the site to aid legibility. All proposals for additional height will be assessed in accordance with the Development Plan and will be required to demonstrate compliance with the performance criteria set out in Table 3 of Appendix 3 of the Development Plan. The onus is on the applicant to demonstrate in their application documentation that the site is appropriate for the height proposed, in the context of an urban design analysis and subject to amenity safeguards in the Development Plan. Even where a site indicates a particular height range, the proposal must meet all performance-based assessment criteria as part of detailed design proposals.

The height ranges set out in figures 4.1 and 4.2 provide for flexibility at the level of the urban block and require responsive and creative design solutions. There is a presumption against proposals for monotonous heights within urban blocks or along key frontages including the Royal Canal. In all cases, varied heights will be required to facilitate good urban design and to achieve a high level of residential amenity, having regard to the illustrated height ranges. In general, heights should be stepped down on the south of urban blocks to allow adequate daylight and sunlight within blocks/courts. Parcel level masterplans shall be used by applicants to guide appropriate heights and demonstrate compliance with this Masterplan.

Opportunities exist for amplified height at prominent corners and to address public open space in order to enhance the overall urban structure in a coherent way and to provide a variety in height across the Masterplan. These opportunities may correspond with prominent corners, can act to punctuate vistas, or can serve as design features for character and legibility, but shall not apply to the overall block. This is to avoid the proliferation of monolithic 'slab' blocks. Additional height, where appropriate, should be no more than 1/3 of the overall length/width of the urban block.

Additional height, set-backs, or amplified height on selected prominent corners, above the ranges set out in figures 4.1 and 4.2 may be considered appropriate as part of a detailed design proposal, as long as the overall proposal complies with the overarching spatial principles and urban structure established throughout the Masterplan, having regard in particular to the potential impact on existing residential amenity, local height context, the land use function and legibility. In general, this

provision will not apply where a proposal is proximate to residential dwellings, if an undue impact on visual or residential amenity would be likely.

The illustrated height ranges set out in figures 4.1 and 4.2 generally assume residential floors and relate to the prevailing street level. Where significant topographical variation occurs between a site and its immediate surrounding context, for example along the western and north east edges and along the Royal Canal corridor, an increase or reduction in the height ranges set out may be considered appropriate, having regard to urban design criteria and amenity.

Reduced building heights are generally required adjacent to Claremont Court in order to safeguard the residential amenity of this mature residential area and to provide an appropriate transition to the newer typology of residential and mixed-use development proposed. In general, prevailing residential heights of up to 3 storeys, with opportunities for 4 storeys will be sought in such locations. The onus is on the applicant to demonstrate an appropriate design response.

AMENDMENT 16

Chapter 4: Urban Form & Design

Height

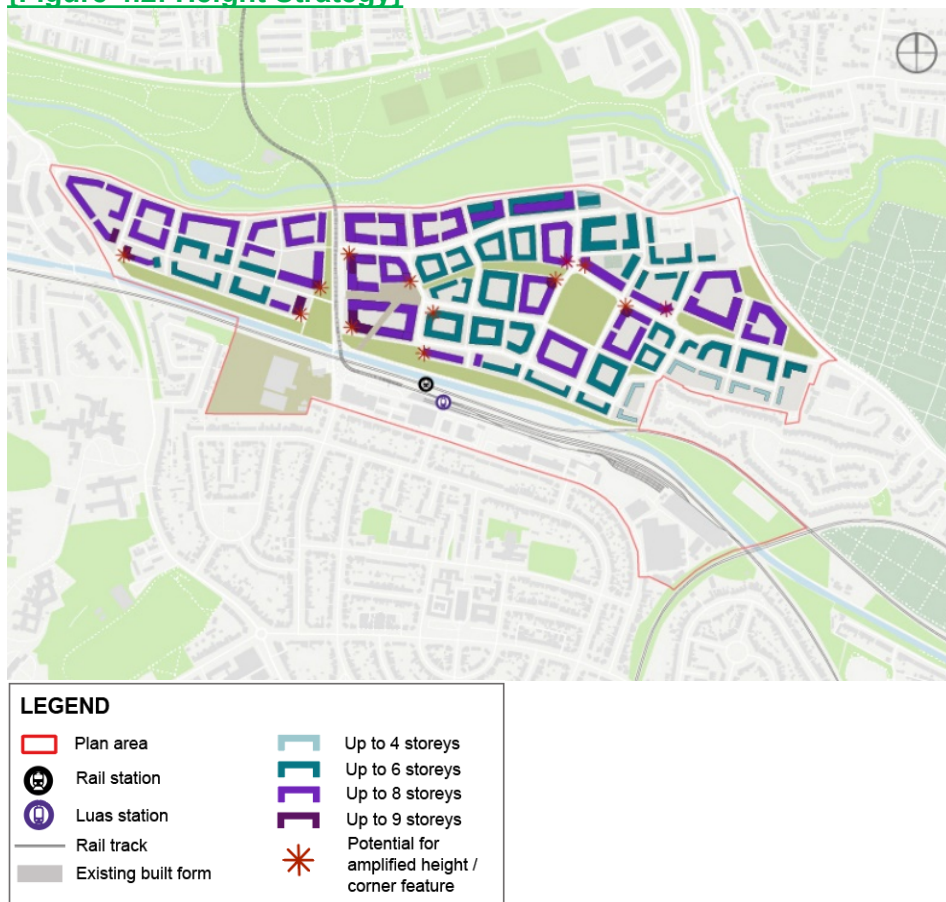
Figure 4.2: Height Strategy

Page: 21

Amendment

Delete figure 4.2. Replace with amended figure. Update figure 4.1: Urban Framework, including legend to reflect changes.

{Figure 4.2: Height Strategy}



AMENDMENT 6

Chapter 4: Urban Form & Design Density and Development Capacity

Page: 22

Amendment

~~(The Sustainable Residential Development and Compact Settlement Guidelines (2024) and the Dublin City Development Plan 2022-2028 set out the net density ranges that can be supported in the area. This Masterplan applies an urban design approach to the calculation of anticipated density and development capacity in line with the Compact Settlement Guidelines. The calculation of net density was carried out in accordance with Appendix B (Measuring Residential Density) of the Guidelines. The block layouts, building envelopes and building heights illustrated in addition to site specific characteristics including sensitive environmental receptors such as the canal and existing residential development have also been considered.~~

~~The provision of an existing transport interchange at Broombridge and proposals for BusConnects, Dart+ West and Luas Finglas support a compact form of development. As such considering the accessible location for this urban extension, it is considered net density in the range of 100-250 units per hectare as set out for Strategic Development and Regeneration Areas (SDRAs) may be considered.~~

~~Having regard to the sustainable density anticipated on the site and to the urban structure, form and land use mix as set out in the Masterplan, it is anticipated that approximately 6,000 homes can be provided in the area.~~

~~“Having regard to the sustainable density anticipated on the site and to the urban structure, form and land use mix as set out in the Masterplan, it is anticipated that approximately 6,000 homes can be provided in the area.”)~~

{The Sustainable Residential Development and Compact Settlement Guidelines (2024) and the Dublin City Development Plan 2022-2028 set out the net residential density ranges that can be supported in the area. This Masterplan applies an urban design approach to the calculation of anticipated density and development capacity in line with the Compact Settlement Guidelines. The calculation of net residential density was carried out in accordance with Appendix B (Measuring Residential Density) of the Guidelines.

While the gross area of the Masterplan constitutes 77 hectares of land, 66 hectares of this is zoned and a further 10 hectares undevelopable. Such land includes land zoned Z9 (Amenity/Open Space Lands/Green Network) and Z11 (Waterways Protection) and includes rail and Luas infrastructure, stations and depots, excluded from the calculation of development capacity. The development capacity and urban framework prepared relates to 45.5 hectares of land currently zoned Z6 (Employment/Enterprise). The calculated net residential area of this land is 28 hectares. The net residential area excludes non-residential uses such as the reserved school site, proposed parks, commercial and community uses, based on approximately 75% residential.

The net residential density ranges set out in the Development Plan for Strategic Development and Regeneration Areas (SDRAs) are between 100-250 units per hectare (uph). The provision of an existing transport interchange at Broombridge and proposals for Dart+ West, Luas Finglas and BusConnects support a compact form of development. As such considering the accessible location for this urban extension,

there is a presumption that net residential density in the range of 200-250 uph is achievable. Densities greater than 250 uph but not exceeding 300 uph may be considered in certain circumstances on appropriate sites, having regard to the provisions of the Development Plan.

Having regard to the sustainable density anticipated on the site and to the urban structure, form and land use mix as set out in the Masterplan, it is anticipated that approximately 6,000 – 7,000 homes can be provided in the area.

Table 4.1

<u>Development Area</u>	<u>Area</u>	<u>Net residential area</u>	<u>Net residential density</u>	<u>Anticipated Development Capacity</u>
<u>Urban Framework lands</u>	<u>45.5 ha</u>	<u>28 ha</u>	<u>200-250 uph</u>	<u>6,000–7,000*</u>

- Development capacity rounded off.

Additional infill opportunities also exist on residential zoned lands to the north east and south of the Royal Canal. These lands have an estimated capacity to deliver between 1,000-1,500 homes, based on comparable densities.}

AMENDMENT 17

Chapter 4: Urban Form & Design

Placeshaping

2. Royal Canal

Page: 23

Amendment

2. Royal Canal

A proposed flagship linear park will form a feature of the redevelopment and regeneration of these industrial lands. This linear park will support the delivery of a new walking and cycle greenway and will also support and enhance biodiversity. A number of breakout spaces will support passive and active recreation and will serve to connect the various character areas and urban spaces. {In general, varied set-backs in the range of 30 – 60 metres are required to facilitate the implementation of this space, to be agreed with the Parks, Biodiversity and Landscape Services Department.} Dublin City Council will actively explore options for the delivery of this linear park, which may include the consideration of land acquisition {and/or phased delivery in association with development proposals. Active ground floor uses along canal frontage will be actively supported. These should generally correspond to breakout spaces to enhance animation and activity. In accordance with the height strategy, additional height may be considered for canal frontage developments, relative to the required set-back needed to facilitate the linear park. This is to ensure appropriate enclosure and surveillance over the public realm.}

AMENDMENT 18

Chapter 4: Urban Form & Design

Placeshaping

3. Slaney Road Neighbourhood Centre

Page: 23

Amendment

3. Slaney Road neighbourhood centre

The Slaney Road neighbourhood centre is focused on local community uses to support new residents in the area. This includes a site for primary school(s) and a co-located community building, including a multi-use games area. These are situated adjacent to a new community grade 1 park. {Residentially zoned lands to the north include some existing residential development as well as lands at Rivermount Cottages with extant planning permission for redevelopment. This redevelopment proposal is supported by the Masterplan.}

AMENDMENT 19

Chapter 4: Urban Form & Design

Guiding Principles to Inform Detailed Design Proposals

Design Objective 8 – Parcel level Masterplans

Page: 24

Amendment

Specific Design Objective 8 - Parcel level Masterplans:

In order to ensure that a coordinated approach is taken to the delivery of public open space, surface water drainage, community and social infrastructure, the first application(s) within individual development parcels will be required to produce a detailed parcel-based masterplan to accompany planning applications+. Where possible, it is the preference of the planning authority that such masterplans should be prepared and agreed with the approval of all landowners {, businesses owners and community/cultural operators} within parcels. However, it is accepted that this is not always possible and can present challenges. Therefore, the planning authority may accept a parcel-based masterplan as part of a planning application, if it is satisfied that: an acceptable level of consultation ~~(between landowners)~~ {, or reasonable efforts to engage, with relevant landowners, businesses owners and community/cultural operators} has taken place; that an appropriate and reasoned spatial response is set out; and that the masterplan complies with this Masterplan. Where the provision of streets, public open spaces or SuDS extends across landownership boundaries within parcels, applicants will be required to demonstrate the coordinated delivery of this essential infrastructure as part of proposals.

Dublin City Council may consider selective land acquisition where it is considered that key regeneration proposals are being unreasonably delayed due a lack of appropriate coordination or agreement between key stakeholders.

+See Figure 6.1

2.3.5 Land Use & Function

Summary

Elected representatives

Marie Sherlock TD acknowledges that the industrial estates support the livelihoods of many and provides for local employment. The land use mix set out in the draft Masterplan is supported in this context, which is noted can support some businesses remaining in the area. The approach to housing is supported.

Residents and members of the public

Many submissions have supported the need for diverse housing types including apartments, townhouses and family sized units. A large number of submissions also focused on affordability, including calls for prioritising social and affordable housing to address the housing crisis. Some submissions requested for own-door units.

A number of submissions addressed future community and social infrastructure requirements to serve future and existing communities in the area. Many submissions noted the requirement for theatres, libraries, community arts spaces and youth centres. Some noted that spaces such as Reilly's Community Garden and Glasnevin Food Market should be retained. Dedicated spaces for local markets and independent traders are sought by some. Concerns were also raised about the potential displacement of local churches, community services and local initiatives currently operating in the industrial estate.

A number of submissions focused on the need for recreational and sports facilities. Such submissions focused on the need to provide for a range of sports and recreation to include swimming pools, gyms, martial arts centres, multi-use sports facilities to include tennis and basketball. A few submissions made proposals for multi-use buildings that combine fitness, cultural and social functions.

It was noted that the location of the identified community centre was too far to the east. A submission questioned whether the identified school site was considered the best location.

One submission proposed to re-define the proposed land use strategy to provide for an enhanced range of uses. Another stated that the ground floor uses along the northern boundary of the site are too vague.

Landowners, businesses and commercial interests

Several submissions raised concerns regarding the future of existing businesses in the area and in particular concerns regarding displacement and relocation costs. Some expressed concerns that there is a lack of industrial or employment spaces to facilitate relocation. Others opposed the principle of the Masterplan, noting their intention to maintain business operations and facilitate employment on the lands, noting financial investments and plans. Concerns regarding the future of existing jobs in the industrial estates were also outlined. Others raised concerns regarding the co-location of residential and employment uses.

Some are critical that retail is not identified in the draft Masterplan. A submission from Ballybunion Glen Limited raises concern with regards to insufficient detail regarding the intended land use mix within areas designated as Urban Village / Neighbourhood Centre. The submission seeks greater clarity on the expected mix of uses within the Urban Village and Neighbourhood Centre areas, suggesting that the current draft provides limited guidance on the integration of residential, commercial, community and employment generating activities.

Amended text is sought by Prevalent Investments Ltd under the heading 'Supporting Enterprise & Employment' on page 35 as follows:

*Design responses to individual parcels and urban blocks within parcels, as previously discussed, can accommodate a range of non-residential uses on ground or lower floors. Pavilion or podium structures can be effectively 'wrapped' by finer grained enterprise units, while residential can be accommodated on upper floors. **Potential also exists within Canalside plots within Character Areas 1 and 2 to deliver a mix of uses that include active type ground floor uses at ground floor level onto the canal / public realm with residential on the upper floors.** The development of sustainable and compact growth and the development of the 15-minute city requires an alternative approach to the consideration of land uses, to include the co-location of uses.*

Prevalent Investments Ltd also request a new Specific Design Objective on page 35:

Specific Design Objective -Supporting active ground floor frontages along the Royal Canal

In order to support an attractive, vibrant and engaging frontage along the Royal Canal linear park and in accordance with the land use strategy and urban design principles set out in the Masterplan, innovative design and land use solutions should be explored to integrate residential use along the canal frontage with active ground floor uses at ground floor level within blocks facing the northern bank of the canal. Such proposals could be further enhanced through the integration of attractive public realm proposals allowing such uses to spill out onto the public domain.

A submission from Glasnevin Food Market welcomes the regeneration to provide housing but seeks a commitment from DCC that the food market will be formally recognised, retained and protected as an amenity and community resource in the final Masterplan.

A submission from Rónin Strength and Fitness Ltd involved prospective commercial interests, outlining that as part of their expansion strategy, they are keen to explore opportunities for establishing a new Rónin gym in the new Baile Bogáin (BallyBoggan) development area.

Community groups, sports clubs, health and education

Submissions from Pirates Studio and 'Give us the Night' address cultural, artistic and community spaces, noting current uses and future uses. 'Give us the Night' specifically reference Development Plan policies which support cultural uses and require their retention as part of regeneration. While these provisions, and the provisions of the Masterplan are supported, concerns are raised regarding implementation, citing past failures to integrate existing cultural uses throughout the City. Clear timelines for rebuilding cultural assets are sought in the context of Development Plan policy, along with stronger oversight, enforcement and collaboration. The retention of Pirates Studio is noted in the submission.

Furthermore, this submission seeks a commitment that any new space will not be operated by a major international promoter, to ensure community access and affordability. It is also requested that such a space be awarded based on track record in supporting local talent and events. It is suggested that consideration of public-private or community-run models, with developer contributions. A multi-use flexible space is encouraged

A submission from Pirates Studio outlines how they have operated within the Masterplan area for almost 6 years providing cultural and artistic spaces for DJs, musicians and performers. The submission welcomes the Masterplans commitment to cultural spaces as part of the regeneration. A variety of examples are referenced, with support documentation appended to the submission.

The submission requests that Pirates Studio:

- Be identified as a cultural stakeholder in the Masterplan.

- Be invited to participate in parcel-level masterplanning affecting their site.
- Be supported in expanding operations to include a licensed venue, outdoor event and community area and dining facilities.
- Be granted necessary planning, licensing, and design consideration to maintain and grow our creative presence.

A submission was received representing the GAA prepared jointly by CLG Na Fianna, Erins Isle GAA and Naomh Fionnbarra GAA. An overview of their role and achievements was outlined, before identifying a number of specific issues. The overall objectives of the draft Masterplan are welcomed, including alignment with the Dublin City Council (DCC) Sports and Wellbeing Partnership's vision, as expressed in the DCC Sports Plan 2024–2029, to make Dublin "More Active, More Often."

A number of substantive and broad comments were made regarding the adequacy of proposed sports and recreation infrastructure to meet current and future needs, especially in light of the acknowledged demographic trends and increased participation in Gaelic games, particularly among girls and young women. Issues include:

- Capacity constraints in existing facilities, including Martin Savage Park and Tolka Valley Park.
- Inadequate provision of full-sized playing pitches. The inclusion of senior-sized, multi-use pitches that can flexibly serve both structured and informal sporting activities are requested.
- Future population growth and increased demand.
- Requested that the Masterplan places greater emphasis on ensuring that sports facilities are accessible, inclusive, and equipped with appropriate supporting infrastructure such as changing rooms, toilets, and parking.
- DCC are encouraged to explore innovative design solutions that embed sustainability within full-scale, community-appropriate facilities.

A submission from Cabra Judo notes that their current location in Cabra Parkside has limited capacity and expresses an interest in developing a shared facility over multiple floors that can be used for multiple sports, dance and meetings. It is noted that the north of the city lacks such facilities outside mainstream sports such as GAA, soccer and rugby.

A submission from Cabra Boxing Club seeks confirmation that they will be accommodated in any new development and seeks clarity as to how this will be integrated.

A submissions from Sankalpa CLG outlines the role they play in providing substance recovery and rehabilitation services, operating from Glasnevin Business Centre since 1998 and states that they need to be included in any redevelopment.

A submission was received from The Redeemed Christian Church of God Open Heavens Dublin (RCCG OHD) outlining concerns that any proposed residential development may have on their long-established presence within the community. The multi-faceted role the church has in the community was outlined, emphasising the community and spiritual aspects of this role. Concerns related to the possibility of relocation and the impact this would have on their congregation and established community networks. The cost of relocation was also outlined. It is requested that the church remain within the community zone outlined in the Masterplan. It is also noted that if this is not possible, the provision of a suitable site, along with financial supports is requested. Open dialogue is welcomed to explore these matters.

A number of submissions were received in Irish which called on the establishment of a new Irish language settlement in Dublin, with various recommendations for manging such a community put forward. An overview of the history of Irish language settlements is put

forward and references are made to Development Plan policies which support the development of the Irish language. It is noted that in November 2023 a campaign was launched at Oireachtas na Gaeilge to establish an Irish language settlement in Dublin. The Ballyboggan Masterplan is considered an opportunity to implement this.

Conradh na Gaeilge and BÁC le Gaeilge recommends the following:

- That at least 15 or more housing units be reserved for Irish speakers.
- That these units be located together in a group, as an 'Irish Quarter' within the development. An entire street would be preferable if possible.
- That restrictions be placed on further selling a unit except to an Irish speaker, a restriction that would stand for at least 15 years and would prohibit letting any house long-term (longer than 3 months in one year) except to Irish speakers.
- Regarding language proficiency, level B2 or higher in spoken Irish on the Common European Framework of Reference for Languages (European Council, 2001) will be the acceptable standard.
- That all educational centres developed in the area in the future would be all-Irish educational centres, i.e. naíonra, Gaelscoil and Gaelcholáiste.
- That Irish language services will be provided within the development or close to the development.
- That only an Irish language name be given to the development, 'Baile Bogáin', and that street names and street signage will be determined based on local native placenames of the area.
- That any signage related to the development as a whole, outside of the street names, be in Irish and in English.

Chief Executive's Response

Submissions requesting enhanced clarity regarding the use mix envisaged in the urban village / neighbourhood centre or along the northern edge with Ballyboggan Road are noted. In order to implement the Masterplan and facilitate redevelopment and regeneration opportunities, these lands will be required to be rezoned to Z14 (Strategic Development and Regeneration Area). This is a mixed-use zone, that facilitates residential and employment/commercial development. The Masterplan sets out the overall spatial vision for land use function. This is based on clustering and co-locating community and other employment based uses together to avoid a random approach to use mix across the lands. All categories are mixed use, providing sufficient flexibility on individual cases, including the canal, while ensuring that the overall vision and urban function is achieved. This approach is compatible with the vision for a 15-minute city as set out in the City Development Plan.

It is emphasised that the draft Masterplan supports existing employers and established uses. Text changes requested by Prevalent Investments Ltd are noted, seeking a new Specific Design Objective and associated text which supports active ground floor use along the Canal. Changes that will be made in section 2.3.4 regarding land use and activity along the Royal Canal have adequately addressed this matter. Therefore, it is not considered necessary to introduce further amendments.

Some submissions have questioned the absence of retail. The draft Masterplan does not support significant, large-scale retail but does support convenience retail, focused on the neighbourhood centres.

Concerns regarding the retention and relocation of community and cultural uses are acknowledged. The provision of such uses is a requirement of the Development Plan in accordance with CUO25. Final uses and individual proposals are a matter for detailed design as part of site-specific proposals. Where landowners are open to collaboratively

working together, it is considered reasonable to allow scope for some community/cultural/community uses to be concentrated together. The existing provision of Objective CUO25 allows for up to half of the 5% community, arts and cultural spaces to be relocated to sites immediately adjacent. For areas designated as SDRAs, this applies to the entire lands. Such provision may assist landowners with regards to land equalisation measures, while also supporting the retention of existing cultural and community uses.

The Chief Executive acknowledges the diverse range of community services and uses that operate in the Dublin Industrial Estate lands. The retention and/or relocation of these uses within the regenerated lands is fully supported by the content of the Masterplan. In response to concerns raised regarding involvement in parcel level masterplans, specific Design Objective 8 will be amended to reflect community and cultural stakeholders and to reinforce the commitment to supporting existing operations and uses. This matter has been addressed in section 2.3.4.

In relation to Reilly's Community Garden, the continuation of this use is compatible with the proposed linear park.

The submission from Cabra Boxing Club is noted. While the Urban Framework set out in the Masterplan does not extend to include lands along Bannow Road, it is emphasised that Cabra Boxing Club is fully supported in its current location. Should infill opportunities arise, the Chief Executive fully supports the Boxing club remaining in this area.

In response to requests to provide or facilitate larger scale sports facilities to include full sized GAA pitches, the Community Grade 1 Parks proposed will not include provision for full sized pitches. A focus on providing community/neighbourhood parks, with multi-uses and functions is underpinned by the Development Plan and Parks Strategy. MUGAs can be supported on these parks, in addition to the shared community facility. The land take required to provide full sized pitches in this location, in addition to requirements for lighting of pitches to increase usability, would significantly limit redevelopment opportunities on the site. In this context, it is noted that TU Dublin and Tolka Valley Park both provide pitches in close proximity.

Several submissions identify a range of community and social uses that are required. The draft Masterplan supports this. Specific uses are a matter for detailed design proposals and proposals will be assessed in accordance with the provisions set out in the Development Plan. In relation to school provision, Dublin City Council has undertaken comprehensive engagement with the Department of Education and Youth in respect of the identified school site. The role of the Planning Authority is to identify suitable sites for schools. The final timeline for delivery of the school and issues involving site acquisition is a matter for the Department of Education. Dublin City Council has indicated that two primary schools and a shared community facility be provided on a reserved 2 hectare site.

The Chief Executive welcomes the submissions received regarding the establishment of an Irish language settlement in Dublin. Section 12.5.6 of the Development Plan outlines the support for the Irish language and culture in the city. Objective CUO49 supports the promotion of the Irish language and support initiatives to establish Irish language network areas/ "Dublin Gaeltacht" in Dublin; and the implementation of Dublin City Council's initiative Baile Átha Cliath le Gaeilge to increase the opportunities and space for people to use and learn. This commitment is emphasised again here. Organisations and initiatives wishing to establish Irish language areas will be fully supported in their endeavours and further engagement is welcomed as part of detailed design proposals. Detailed design and governance matters are adequately addressed by the provision of the Development Plan. These are not matters to be addressed in the Masterplan.

Chief Executive's Recommendation

The draft Masterplan will be amended to include the following text.

AMENDMENT 7

Chapter 5: Land Use & Function

Page: 34

Specific Design Objective 16 – School Site

Amendment

Specific Design Objective 16 - School Site:

To reserve a site within the Masterplan to accommodate a new educational facility to serve the population of the area, and to work with the Department of Education where the decision is made to proceed with ~~(a)~~ new school{s}. The design of any new educational facility must support a compact approach to infrastructure provision and shall ensure that facilities such as pitches and/or halls can be used out of hours.

2.3.6 Implementation

Summary

Elected representatives

A submission from Marie Sherlock TD supports the parcelling approach to implementation set out in the Masterplan. Reference to Uisce Éireann's submission is made, noting that Dublin City Council should secure a commitment on the necessary investment in water supply. It is also stressed that this should not hold up the implementation of the Masterplan.

Residents and members of the public

Several submissions have expressed their support for the parcelling approach and for the general approach to implementation. Some have requested a more detailed phasing and infrastructure delivery strategy to include timelines. One submission suggested the introduction of an implementation strategy based on individual development zones, with requirements for small scale masterplans. Another suggested that development be phased according to the delivery of essential infrastructure and services to include the Royal Canal Greenway.

Others have raised concerns and some have opposed the future re-zoning required to implement the Masterplan, expressing a preference for the status quo to remain the same.

One submission mentioned the need for a more cautious approach in parcel D15 to ensure the character and integrity of the established existing community is not compromised.

Another noted the requirement for more comprehensive land management tools.

Landowners, businesses and commercial interests

Several requests were made regarding the requirement for parcel level masterplans and the wording of Specific Design Objective 8. Sub-parcel alternatives were suggested with enhanced flexibility for stand alone proposals. This matter was broadly addressed in section 2.3.4.

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

Kimpton Vale

- Located between parcels D19 and D20 stating that such borders would complicate independent development due to the many landowners already present in the area.
- Seeks that their lands be designated as a single development parcel.
- Recognition for sub-parcels is requested to allow for independent development which will solve issue of fragmented landownership in the masterplan lands.
- Do not want cooperation from adjoining landowners.
- The submission states that the key constraint is the road network, which is not under the local authority's control, the submission suggests the local authority takes charge of estate roads to facilitate development.

Woodberry Packaging Limited Operator of Colorman (Ireland) Ltd

- Seeks their own development parcel to facilitate independent development. Concerns about fragmented ownership and co-operation challenges.
- Text change sought:
In order to ensure that coordinated approach is taken to the delivery of public open space, surface water drainage, community and social infrastructure, the first applications within development parcels illustrated in figure 6.1 will be required to produce a detailed parcel-based masterplan. Where possible, it is the preference of

the planning authority that such masterplans should be prepared and agreed with a number of landowners within parcels.

*However, it is accepted that this is not always possible. Therefore, the planning authority may accept a **sub-parcel** based masterplan as part of a planning application, it is satisfied that an appropriate and reasoned spatial response is set out and that the masterplan complies with this Masterplan. Where the provision of streets, public open space or SuDS extends across landownership boundaries within parcels and **sub-parcels**, applicants will be required **where possible** to demonstrate the coordinated delivery of this essential infrastructure as part of proposals.*

Downshire Propco Limited

- It is requested that sub-parcels be allowed to proceed independently, without the need for cooperation from all landowners in a parcel.
- Commercial viability and implementation threatened due to lack of flexibility, and density, height and built-form restrictions.

Flynn Group

- Site split between Development Parcel D6 and Community Park CP1.
- Requests boundary of CP1 is reduced and D6 increased to reflect ownership.

Bartra Property Ltd

- The submission notes issued raised by Uisce Éireann noting that key water and wastewater infrastructure may not be delivered within the plan period.
- The submission proposes that provisions be included in the Masterplan for interim or temporary infrastructure solutions. It is also suggested that early guidance be given to avoid delays at the planning application stage.

Fridge Spares Ltd

- Support for the non-sequential approach to the implementation of the Masterplan.
- Concern is raised with wording of Specific Design Objective 21 – Funding & Implementation regarding the potential for Compulsory Purchase Ordering.
- Requested that parcels only be development when they become available, to support existing employers.

Propmaster Ventures Limited

- Suggested that the Masterplan is overly prescriptive in terms of layout, subdivision, and design, this rigidity is expected to hinder the timely and practical redevelopment of the site. Flexibility sought.
- Concern is raised with regards to the sub-division of the land and any issues which may arise due to lack of agreement between all landowners present within parcel D7. As such the site should be recognised and be included in the early phases of development.
- Considered existing Section 49 Development Contribution Scheme places a restriction on redevelopment.
- Confirm intention to contribute to infrastructure in a pro-rata manner.

Blacklion Real Estate Fund

- The submission raises issue with the proposed delineation between Development Parcels D10 and D11 which do not align with land ownership patterns.
- The submission requests that the masterplan revise parcel-based boundaries between parcels D10 and D11 to include the northern open space area within parcel D10 and to exclude land which are already developed and or committed under

planning from green space allocations unless such land is publicly accessible or undeveloped.

Figure 3.2: Extract of Fig 6.1 Development Parcels (approximate location of sites outlined in red for information purposes only)



Figure 2.1: Site Location Map with Subject lands identified in Red



Source: Google Maps

- Requested that the Masterplan introduced a new Specific Design Objective, relating to the undergrounding of existing 110kv power lines, noting that the development potential of Unit 124 is restricted. The following wording is suggested:
“Support the undergrounding of existing overhead electricity transmission lines traversing key development parcels as a priority infrastructure objective in its own right, while also seeking opportunities for coordination with other major infrastructure works, such as the Luas Finglas extension, where feasible.”
- It is noted that this should be coordinated with Luas Finglas works.

Ballybunion Glen Limited

- Seeks an amendment to the Masterplan to support the future undergrounding of electricity cables which impacts the future redevelopment of 124 Broombridge Close. It is considered that this aligns with Luas Finglas works. The following wording is suggested:

Design Objective - Infrastructure Coordination and Power Line Rationalisation

“Support the undergrounding of existing overhead electricity transmission lines traversing key development parcels as a priority infrastructure objective in its own right, while also seeking opportunities for coordination with other major infrastructure works, such as the Luas Finglas extension, where feasible.”

Prevalent Investments Ltd

- Seeks text changes to Chapter 6 to align with proposed changes to Specific Design Objective 8.

Community groups, sports clubs, health and education

Submissions received from a number of community organisations or initiatives expressed strong interest in maintaining a presence in the area as redevelopment occurs. As such, many stated their wish to be involved in parcel level masterplans.

Chief Executive's Response

Implementation

While concerns relating to future relocation of existing uses and businesses are noted, the National Planning Framework (NPF) supports compact growth by targeting a significant proportion of future urban development within the existing built footprint of urban areas. This includes the regeneration of urban brownfield lands, including industrial estates in central locations, served by high capacity public transport in order to sustainably accommodate Ireland's future population (NPO 8, NPO 10, NPO 20). The Masterplan is fully aligned with the Transport Strategy for the Greater Dublin Area 2022-2042 and the principles of Transport Orientated Development, with regards to National Policy Objective 10 of the NPF. In addition to facilitating new homes and supporting existing and future jobs, the Masterplan is underpinned by exemplary urban design principles that fully integrate existing amenities to include the Broombridge transport interchange and the Royal Canal corridor. The Masterplan and future re-zoning is being progressed in this context.

Requests for certainty on the timelines for developments coming forward are not possible to specify. This strategic site is largely in private ownership by multiple landowners, many of whom have varied leaseholds in place. What the Masterplan does is provide the framework to allow schemes to come forward independently, each contributing to the overall vision of the area, and delivering much need housing, amenities and employment in this strategic location. If some landowners are not in a position to bring forward development, or wish to retain their existing operations, this should not prejudice other developments that are consistent with the Masterplan. The Masterplan does however require some landowners to work collaboratively on the provision of local access streets and open spaces in order to provide a rational and structured urban form that does not always follow ownership boundaries.

Development parcels

The Masterplan introduces a phasing and implementation strategy that is based on a parcel-based approach. This has taken into consideration the pattern of landownership (folios) and the required essential infrastructure such as open space, surface water drainage and the street network. While a sequential approach to the redevelopment of the lands is required, the existing street network and proximity to existing public transportation allows, in many cases, a number of sites to come forward for redevelopment across different areas of the lands. However, it is also accepted that many businesses will remain operating for many years. For these reasons, it is an appropriate urban design and rationale planning requirement to require a parcel level masterplan. These masterplans are intended to provide an enhanced level of detail to support individual proposals. They will play a key role in providing an evidence base for demonstrating how individual proposals will coordinate in the medium and longer term with adjoining sites, that may not see redevelopment for many years.

The Chief Executive acknowledges requests made to introduce enhanced flexibility with regard to the parcel-based approach to phasing and implementation and in particular regarding the requirement for parcel level masterplans. While the matter regarding parcel level masterplans has been addressed in section 2.3.4 and changes recommended, it is considered appropriate that the text in Chapter 6 be amended to reflect these changes and to enhance clarity regarding the expectation and scope of masterplans having regard to the set out development parcel boundaries.

In general and in the majority of cases, development parcels align with the existing road network. In some cases, this is not the case. As such it is accepted that minor discrepancies can occur. The request from Blacklion Real Estate Fund to amend the boundary between D10 and D11 to include the northern portion of open space within D10 is considered reasonable. However, the exclusion of a portion of the parcel based on ownership is not considered acceptable. This is bound by the existing road network. The request from Kimpton Vale Ltd regarding development parcels D19 and D20 are noted. Minor overlap into D20 occurs. However, the parcel broadly aligns with the current circulation network. Clarifying text relating to smaller discrepancies and requests is recommended.

Requests to amend the boundaries of Community Grade 1 Park CP1 and development parcel D6 are noted. While attempts to align development parcels with ownership and the existing road network were made, this cannot apply to strategic community infrastructure including CP1, CP2, RC1, RC2, RC3 and SC.

While issues relating to specific design matters for some development parcels are acknowledged, the content of the Masterplan, in addition to the provisions of the Development Plan, adequately address these concerns. Detailed design proposals will be subject to a separate planning consent process. Such proposals will be comprehensively assessed having regard to their site specific context.

Infrastructure

The Chief Executive acknowledges reference to matters raised by Uisce Éireann (UÉ) and by Marie Sherlock TD. DCC supports the delivery of the Water Supply Project for the Eastern and Midland Region and the Greater Dublin Drainage Project, recognising their role in supporting the growth of Dublin city. While the status of the water supply to the Dublin Region and wastewater treatment capacity are noted, this is a matter for UÉ as the responsible body for water services for Ireland. DCC has comprehensively engaged with UÉ to deliver sustainable growth to the city and will continue to liaise proactively with them as part of the implementation of the Masterplan.

Requests from Blacklion Real Estate Fund and Ballybunion Glen Limited regarding the future undergrounding of existing 110 kv power lines are noted. The City Council is committed to working with all stakeholders and supporting infrastructure and works required to unlock the full potential of strategic lands. While the text contained in 'Funding and Implementation' supports this, additional text, will be provided that clearly which supports the principle of undergrounding.

Land Equalisation / Development Contributions

Several submissions have requested that Dublin City Council introduce land equalisation measures on the basis that some landowners are providing more open space than others, more road infrastructure and more community facilities. These key infrastructural requirements each bear a cost, in terms of land or finance, and are all critically vital to the success of the area.

The points raised are noted and understood, however Dublin City Council is not the regeneration authority for implementation of these lands. The City Council, as the Planning Authority has prepared a Masterplan for these lands and proposes a future variation to rezone the Z6 (Employment/Enterprise) lands at this location to facilitate regeneration and intensification of strategically placed land. The Masterplan sets out the Urban Framework that will guide future redevelopment in a coherent and equitable manner.

The Dublin City Development Plan provides some scope for various landowners to work together collaboratively with regard to the provision of community, arts and cultural spaces. Objective CUO25 allows for the relocation of a portion of these uses (no more 2.5%) to sites

immediately adjacent. Other flexibility arises from the provision of public open space. Where some urban blocks / landholdings do not include a requirement for key public open space, then a development contribution in lieu of the typical 10% public open space requirement, will be accepted, subject to agreement.

Specific Design Objective 21 - Funding & Implementation of the draft Masterplan notes that Dublin City Council will use the City's Development Contributions Scheme to support the implementation of the Masterplan, supplementing the levies with additional funding from other sources where possible. Selective land acquisition may be pursued where it is considered that key regeneration proposals are being unreasonably delayed due a lack of appropriate coordination or agreement between key stakeholders. This commitment is retained, and the Council will continue to liaise with landowners on opportunities that may arise. The City Council may also consider the possibility of a special development contributions scheme, but it is noted that the provision of such is subject to a separate process. It is noted that a supplementary [special] development contribution [Luas] is already in effect over the lands and it is not intended that a further additional contribution scheme will accompany the Masterplan at this time in the interest of ensuring viability and competitiveness. Provision for such a scheme can only be considered following on from the adoption of an agreed plan.

Chief Executive's Recommendation

The draft Masterplan will be amended to include the following text.

AMENDMENT 20

Chapter 6: Implementation

Page: 38

Amendment

Delete third paragraph and insert new second paragraph.

~~(In order to ensure that a coordinated approach is taken to the delivery of public open space, surface water drainage, community and social infrastructure, the first applications within development parcels illustrated in figure 6.1 will be required to produce a detailed parcel-based masterplan. Where possible, it is the preference of the planning authority that such masterplans should be prepared and agreed with a number of landowners within parcels. However, it is accepted that this is not always possible. Therefore, the planning authority may accept a parcel-based masterplan as part of a planning application, if it is satisfied that an appropriate and reasoned spatial response is set out and that the masterplan complies with this Masterplan. Where the provision of streets, public open spaces or SuDS extends across landownership boundaries within parcels, applicants will be required to demonstrate the coordinated delivery of this essential infrastructure as part of proposals.)~~

{Brownfield urban regeneration is complex and requires a coordinated approach across landholdings to facilitate redevelopment opportunities and support excellent placemaking. Specific Design Objective 8 requires applicants to prepare a parcel level Masterplan for the first application(s) within development parcels, to ensure that a coordinated approach is taken to redevelopment. In general, this will apply to the development parcels illustrated in figure 6.1. However, the area to be included in parcel-level masterplans will be agreed following consultation with the Planning Authority as part of the development management process. Minor deviations and a degree of flexibility to the boundary of parcel-level masterplans will be permitted, to take account of landownership or other site-specific matters which may require a masterplan to consider matters in adjacent development parcels to support detailed proposals. While the content of parcel-level masterplans will be informed by the provisions set out in the Development Plan and agreed with the Planning Authority, at a minimum they should demonstrate compliance with this Masterplan and show how

a proposed development responds to existing structure and uses, while ensuring future integration with adjoining sites as the lands transition away from their current uses.}

Implementation will be monitored over the life of the Masterplan and a more restrictive development phasing may be employed to focus the delivery of key social and physical infrastructure if the market fails to satisfactorily deliver on the ambitions of this plan.

Dublin City Council may consider selective land acquisition where it is considered that key regeneration proposals are being unreasonably delayed due a lack of appropriate coordination or agreement between key stakeholders.

AMENDMENT 21

Chapter 6: Implementation

Figure 6.1 Development Parcels

Page: 38

Amendment

Amend the boundary between development parcels D10 and D11. Note, this is a graphical amendment.

AMENDMENT 22

Chapter 6: Implementation

Funding & Implementation

Paragraph eight

Page: 40

Amendment

There is a significant level of strategic infrastructure required across the lands, the majority of which will ultimately need to be coordinated and delivered by a number of state agencies, including public transport, roads, utility networks, education and community facilities. {The undergrounding of overhead electricity transmission lines traversing development parcels will be actively explored, where feasible.}

2.3.7 Issues raised by theme

Planning legislation and procedural matters

Summary

A number of submissions received raised general concerns about the planning process. Some submissions were critical of the National Planning Framework (NPF) and population caps placed on growth. Others called for amendments to regulations to allow for higher densities and greater height.

Several submission from landowners, businesses and members of the public opposed the principle of redevelopment on the lands, with some calling for more lands to be allocated for industrial businesses, with various locations put forward. Many submissions have raised concerns that regeneration and redevelopment will take many years, with claims that there is a lack of supports for businesses. Others note that relocation costs would be greater than the value of their sites. Some suggested compensatory measures should be considered.

Some submissions raised concerns regarding the governance and procedures followed during the preparation of the draft Masterplan, criticising the public consultations as a 'tick box' exercise. In particular, extended consultation time was requested, with some criticisms of the timing of the consultation. The timing of the public drop-in sessions was also noted, with calls for weekend and evening events. Some stated that there was a lack of DCC representatives in attendance. It is claimed by some that various local businesses were unaware of the on-going Masterplan consultation further stating that insufficient consultation has taken place, particularly with businesses who do not wish to redevelop. It was noted that consultation via social media was poor.

It was suggested that viability was not considered as part of the preparation of the draft Masterplan.

Matters involving Capital Gains Tax and other legal matters regarding land conveyancing were noted in submissions.

Chief Executive's Response

Planning policy and legislation, including the Planning and Development Act 2000 (as amended) is formulated at a national level by the Department of Housing, Planning and Local Government and enacted by the Oireachtas. DCC as a local authority is responsible for delivering the planning service within the legislative and policy framework established by the Oireachtas. The City Council cannot act beyond this framework by formulating or implementing planning legislation and policy independent of the Oireachtas.

Concerns regarding land conveyancing and taxation are not planning matters.

The principle of redevelopment and regeneration is established in the Dublin City Development Plan 2022-2028, under Objective CSO1. While concerns relating to future relocation of existing uses and businesses are noted, the National Planning Framework (NPF) supports compact growth by targeting a significant proportion of future urban development within the existing built footprint of urban areas. This includes the regeneration of urban brownfield lands, including industrial estates in central locations, served by high capacity public transport in order to sustainably accommodate Ireland's future population (NPO 8, NPO 10, NPO 20). The Masterplan is fully aligned with the Transport Strategy for the Greater Dublin Area 2022-2042 and the principles of Transport Orientated Development, with regards to National Policy Objective 10 of the NPF. In addition to facilitating new homes and supporting existing and future jobs, the Masterplan is underpinned by exemplary urban

design principles that fully integrate existing amenities to include the Broombridge transport interchange and the Royal Canal corridor.

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

Dublin City Council has undertaken extensive consultation with state/public bodies, elected representatives, landowners and members of the public throughout this plan making process. This included proactive engagement with elected representatives, meeting with landowners and engagement with young people. It is noted that the publication and content of the draft Plan received significant media attention and there was a high level of engagement and public discourse on key issues generally. Furthermore, an information letter was issued to premises in the estate and to registered landowners to make full efforts to ensure as many people as possible were aware of the call for submissions and had the opportunity to engage on issues. Two public drop-in sessions were well attended by members of the public.

While DCC will endeavour to enhance engagement in all future consultation processes, to include social media, it is emphasised that while this process is non-statutory, the level of consultation undertaken exceeded that of statutory requirements. Full details of the consultation process that has taken place during the public consultation period for the draft Masterplan is outlined in Section 1.2.

Chief Executive's Recommendation

No change recommended.

Development Management requirements and detailed design

Summary

Several submissions articulate concerns regarding the lack of detail regarding parking and traffic management in the draft Masterplan, with suggestions put forward for parking hubs. Some claim that reduced car parking will lead to unmanaged on-street parking on surrounding streets, particularly traffic generated by schools. Some submissions have expressed concerns regarding parking for people with disabilities.

A number of submissions have raised issues regarding various development standards including apartments, district heating, rainwater harvesting and smart technologies.

Some submissions note that the draft Masterplan provides no clarity regarding the upgrading of water and sewage in the area.

Chief Executive's Response

The final Masterplan will sit within the operational requirements of the relevant Dublin City Development Plan. Development standards to include parking requirements, apartment standards and other detailed design measures will be assessed at planning application stage, as part of detailed design proposals.

The Dublin City Development Plan sets out the maximum car parking standards based on a zonal approach which is based on location and proximity to public transport nodes and

corridors. Parking is not a matter for consideration at this stage but will be assessed in detail as part of planning applications. Traffic management will also be considered as part of the detailed design phase of streets and as part of any proposed developments.

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

Chief Executive's Recommendation

No change is recommended.

Construction Management

Summary

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

Concerns regarding wildlife during construction states were noted. Concerns regarding the displacement of animals was identified, including potential impacts to a local cat population.

Chief Executive's Response

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

Planning applications are required to consider the environment, including flora and fauna through screening for Environmental Impact Assessment and Appropriate Assessment. Consideration of environmental impacts, including any impacts to local wildlife and animals is required. Some species are protected, and as such have a higher degree of protection. These matters will be carefully considered as part of future proposals. The plan has been subject to Strategic Environmental Assessment and Appropriate and will continue to be assessed as formalisation of the plan develops.

Chief Executive's Recommendation

No change is recommended.

Traffic congestion and safety

Summary

A number of submissions have expressed concern that any future redevelopment of the lands will exacerbate existing traffic congestion and safety in the area, specifically citing congestion at Broombridge, at the Finglas Road/Ballyboggan Road junction and at the Finglas Road/Slaney Road junction. It is suggested that the recent 8th Lock development increased traffic in the area. It is suggested that traffic congestion proximate to the proposed school site will occur.

Chief Executive's Response

The purpose of the draft Masterplan is not to address traffic congestion and sustainable movement in the wider area but to create a new urban quarter that maximises opportunities for walking, cycling and provide access to public transport. Specific movement related matters are addressed under Chapter 3: Urban Structure and in response to the submission received from the NTA. Many of these concerns will be addressed as part of any planning applications lodged.

Chief Executive's Recommendation

No change is recommended.

Public transport

Summary

Concerns are expressed regarding capacity issues, frequency and reliability of rail, Luas and bus services in the area.

Chief Executive's Response

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

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

Chief Executive's Recommendation

No change is recommended.

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

Summary

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

The lack of policing was also noted, with calls for a new Garda Station.

Chief Executive's Response

The draft Masterplan sets out the envisaged community and cultural uses that are required to support the future community of the area. Individual planning applications will be required to demonstrate how they comply with the final Masterplan and the provisions set out in the Development Plan regarding the provision of social and community infrastructure. These matters will be addressed as part of any planning applications. The draft Masterplan has identified a site that will be reserved for two primary schools and a shared community facility. While the identification of school sites is a matter for DCC, the acquisition of this site and the delivery of the school is a matter for the Department of Education and Youth.

An Garda Siochana are responsible for addressing anti-social behaviour under their legal powers. It is not a matter that can be addressed under the Planning and Development Act 2000 (as amended). However, planning applications are required to address safety through

design as part of a community safety strategy, as outlined in Chapter 15 of the Development Plan.

Chief Executive's Recommendation

No change is recommended.

Miscellaneous

Summary

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

It was noted that nimbyism has slowed down housing provision.

One submission on behalf of Vantage Towers has indicated the need to maintain their 42m high telecommunication towers to further provide telecommunication services within the area.

Chief Executive's Response

The issue of housing affordability is addressed by national policy and legislation and cannot be addressed separately by the Masterplan.

The planning process is an open and public one. In that context, submissions/observations can be made by members of the public and interested parties in respect of proposed developments, which may be taken into consideration by a Planning Authority in making a decision. The issue of public consultation in the planning system is addressed by national policy and legislation and cannot be addressed separately by the Masterplan.

The submission by Vantage Towers regarding their maintenance requirements is noted.

Chief Executive's Recommendation

No change recommended.

3.0 Conclusion

This Chief Executive's Report on the submissions received during the public consultation process on the draft Baile Bogáin Masterplan is hereby submitted to the Members of the Central Area Committee.

The Chief Executive intends for this report and the draft Baile Bogáin Masterplan to be considered and noted at the Central Area Committee Meeting on the 8th of July 2025.

Following this, the Chief Executive intends to commence a Variation to the Dublin City Development Plan 2022-2028, to re-zone 45.5 hectares of Z6 (Employment/Enterprise) lands at Dublin Industrial Estate to Z14 (Strategic Development and Regeneration Area) and to incorporate the Masterplan into the Development Plan by designating a new Strategic Development and Regeneration Area (SDRA).