

Ms. Deirdre Scully,  
Development Plan Team,  
Planning and Property Development Department,  
Dublin City Council,  
Wood Quay, Dublin 8

31<sup>st</sup> August 2022

**Re: Formal Submission on Stage 3 – Proposed Material Alterations of the Dublin City Development Plan 2022-2028 in respect of the site of the existing Colorman (Ireland) premises, Broombridge Industrial Estate, Broombridge Road, Dublin 11.**

Dear Ms. Scully,

Hughes Planning and Development Consultants, 85 Merrion Square, Dublin 2 have been instructed by our clients, Colorman (Ireland) Limited, with a registered address of 33 Fitzwilliam Place, Dublin 2, to make a submission on the proposed Material Alterations to the Draft Dublin City Development Plan 2022-2028, with respect to the existing Colorman (Ireland) premises at Broombridge Industrial Estate, Broombridge Road, Cabra East, Dublin 11, D11 X064.

This submission is made in response to a public notice dated 27<sup>th</sup> July 2022, inviting submissions up until 1<sup>st</sup> September 2022, in relation to the proposed Material Alterations to the Draft Dublin City Development Plan 2022-2028. This submission has regard to the proposed amendments set forth by Dublin City Council's Chief Executive in respect of the existing Z6 zoned lands featuring within the Dublin Industrial Estate and surrounding lands, in the proposed Material Alterations to the Dublin City Development Plan 2022-2028, and outlines our clients support for the redevelopment of this strategically located landbank.



Figure 1.0 Aerial image showing the outline of the existing Dublin/Broombridge Industrial Estate and the location of the Colorman (Ireland) site (red outline).

Whilst it is acknowledged and supported that Section 2.3.5 of the Draft Development Plan identifies Glasnevin (the Dublin Industrial Estate and surrounding lands) as an industrially zoned landbank which has significant potential for regeneration as new mixed use communities, Material Alteration Reference **No. 2.8** stipulates that *'it is the intention of Dublin City Council, following the completion of feasibility studies for these industrial lands, to seek Government approval for the appropriate statutory designation of these lands and to bring forward the early regeneration of these strategic lands.'* Furthermore, Table 2-13 of the Draft Plan and Material Alteration **No. 2.10** indicates that a statutory Local Area Plan will be commenced over the plan period for the Glasnevin, (Dublin Industrial Estate and environs). Our clients recognise the need for the coordinated redevelopment of this important landbank, however it is respectfully requested that the early redevelopment of primely located sites within this landbank which are readily available for redevelopment, such as the existing Colorman site, be brought forward and favourably considered for early redevelopment in advance of the adoption of a formal statutory designation for the lands.

We consider the above request to be justified given the strategic location of the site which represents the optimum starting point for the redevelopment and regeneration of the southern part of the Broombridge Industrial Estate and will act as a stimulus for the continued development of this area. The site occupies a prominent corner site location at the junction of the Royal Canal and Broombridge Road which is within a short walking distance of high-capacity, high-frequency public transport services including the Broombridge Dart and Luas stations, together with numerous serviced bus stops located within the wider area. The delivery of the future Luas Green line to Finglas, which whilst creating uncertainty to the company in terms of their future operation and growth and this location, given the orientation of the line route along the western boundary of the site, will further enhance accessibility to and from the lands, providing a unique opportunity to accommodate the compact growth of the city, in an area which is well serviced by public transport and within easy reach of Dublin City Centre and other various amenities and facilities.

In the context of the above, the policy direction at a National (National Planning Framework) and Regional (Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly) level places significant emphasis the redevelopment of brownfield lands for higher density development, encouraging development that can stimulate more people and generate more jobs and activity within existing cities. In addition, one of the Key Growth enablers for Dublin stated within the National Planning Framework (NPF) relates to *'relocating less intensive uses outside the M50 ring in particular and from the existing built-up area generally'*. The proposed redevelopment of the Colorman site wholly complies with these objectives.

Colorman have recently commissioned numerous detailed assessments, including inter alia, engineering, architectural, planning and environmental studies in respect of their lands and have also engaged the services of a reputable urban designer to prepare an indicative masterplan for the site and the broader area featuring within the southern portion of the Broombridge Industrial Estate. This assessment, together with the numerous other aforementioned studies undertaken demonstrate that the Colorman site at Broombridge Industrial Estate can be developed in the short-term, without impacting upon the future development of the overall estate. It is considered that this parcel of lands is of a significant enough scale to be developed independently without compromising the development potential of surrounding sites, given its prominent corner location, interfacing with the Royal Canal and the Broombridge DART and LUAS terminals.

On the basis of the foregoing, and in considered that the site and its surroundings are clearly earmarked for redevelopment, it is the intent of our client to put forward a Z6 compliant development proposal to the Development Management Team of Dublin City Council which seeks to create a dynamic urban quarter, with the site offering an opportunity to create spaces which will house and inspire a new generation of residents, business owners, employers and employees within what has the potential to

become a leading and vibrant destination within the city boundary. This ambitious plan will deliver a best-in-class employment destination, balanced by a vibrant new living quarter that will not only transform, but futureproof this area of Dublin 11. Not only will the proposal effectively bring hundreds of jobs to the area and the city more broadly, but we believe it will also breathe new life into this dated industrial area of the city which has been underutilised and earmarked for redevelopment for a number of years. Our client's, Colorman (Ireland) Ltd. are fully cognisant of the strategic qualities of the lands and aspire to create an imaginative, energetic and vibrant area within the city which importantly, provides new jobs and delivers much needed quality housing within a highly accessible location.

On account of their location, our clients lands present a natural starting point for the overall redevelopment of the wider estate and the redevelopment of same can be accommodated in the absence of a statutory designation as suggested within the Proposed Material Alterations. We believe the development of the site and its integration with the surrounding plots can be guided by the Planning Authority through the Development Management Process in accordance with policies and objectives of the development plan. We ask that the Planning Authority give due consideration to the above and consider the strategic benefits of facilitating the short term redevelopment of the Colorman lands, as part of a collaborative process between Dublin City Council, our clients and other land owners within the estate.

We also refer to the proposed Material Alteration Reference **No. 14.5** which introduces '*embassy residential*', as an open for consideration use on Z6 zoned lands. This follows the removal of '*residential*' as an open for consideration land-use as part of the previously published Draft Dublin City Development Plan 2022-2028. Having regard to the extent and location of Z6 zoned lands featuring within the Dublin/Broombridge Industrial Estate, within the immediate proximity of high quality transport services and within easy reach of other key centres, it is considered that these lands would be ideally suited to employment generating land-uses with a subsidiary element of residential development to foster the creation of a cohesive mix of uses, each of which complements on another.

Locations as such, comprising brownfield land, are considered from a national and regional perspective as being an optimal location for concentrated population and employment growth which will promote public transport orientated development and will accommodate the densification of highly accessible sites. It is prudent to note at this juncture, that the proposed statutory designation and LAP which is proposed for the Dublin Industrial Estate will inevitably be a time and resource intensive process for the Planning Authority, and in the absence of a demonstratable timeframe commitment for the delivery of same, the lands within the estate may well remain undeveloped and underutilised for the years to come. Whilst the preferred approach from the perspective of our client would be to see the more immediate designation or rezoning of these lands as part of the 2022-2028 Development Plan, in the interests of ensuring the comprehensive future redevelopment of the estate lands, along with the provision of an appropriate mix of uses relative to the sites highly accessible location, the re-introduction of '*residential*' as an open for consideration use on Z6 zoned lands as such is not only appropriate but is necessary in the interests of proper planning and sustainable development.

We trust that the Planning Authority will have regard to the contents of this submission in its adoption of the Dublin City Development Plan 2022-2028



Kevin Hughes MIPI MRTPI  
Director for HPDC Ltd.