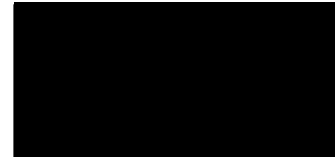




Development Plan Team,
Planning & Property Development Department,
Block 4 Floor 3,
Civic Offices,
Wood Quay,
Dublin 8, D08 RF3F

All Hallows Area Association



31 August 2022

Proposed Zoning amendments to Dublin City Development Plan 2022-2028

Dear Sir/Madam,

The All Hallows Area Association (AHAA) wishes to submit representations on Stage 3 of the Draft Dublin City Development Plan 2022-2028. Our resident's association represents members living on 14 roads in the Drumcondra area including Griffith Avenue (from the Drumcondra Rd to the Malahide Rd).

The specific issue is under the reference "Zoning Amendments Map Sheet B, Map reference B-0012" per extract from page 19 of Planning Department Document "Proposed Amendments to draft". See extract below.

Site Address	Zoning From	Zoning To	Map Sheet	Map Reference
Grass Verge adjacent to DCU lands, Griffith Avenue Dublin 9	Z9	White Land	Map B	B-0012

AHAA opposes the proposed rezoning as outlined above and sets out the reasons in the following paragraphs.

Background:

- Dublin City University put in a request to change the Z9 to Z12 on 14 February 2021 and this was refused, we understand for the following reasons:
 - the land is currently in use as Z9
 - Dublin City Council (DCC) stated that the verge is integral to protecting the tree lined character of Griffith Avenue
 - there are other existing and potential access point to the land.
- Cllr Niall Ring proposed the motion for zoning amendment according to DCC planning - asking for the zoning to change to White Land. We feel this is disingenuous as there is a clear intent for the land which has been stated as access for vehicles which is why we believe he has asked for the rezoning. It is our understanding that White Land is only to be used where there is no purpose and on the basis we feel the request should be ruled out of order.
- DCC have stated that there are existing alternative access points and potential other access points for access to the site and thus this rezoning is unnecessary
- DCC did also include the following regarding an environmental assessment if motion carried:

Motion could lead to loss of significant trees / treescape. Likely significant environmental effects on biodiversity and landscape. SEA is required. If Motion is carried forward then it may require a protective addition – e.g. no existing trees shall be removed or otherwise adversely impacted by any proposed works.*

*SEA = Strategic Environmental Assessment

July Council report extract

The July Council meeting reports show that the motion to change came from Cllr Niall Ring

Cllr Nial Ring - Motion No. 14.12 MOT-01491

MOTION 86. Chapter: Rezoning Motion. That the section of grass verge, 30m in length approximately, running parallel between the Dublin City University (DCU) site and the public road along Griffith Avenue, between the footpath and the road, currently zoned as Z9 in the current City Development Plan be either rezoned to facilitate access across the grass verge or alternatively to update the Z9 definition wording to include new wording permitting access across the grass verge and allow

a new entrance off Griffith Avenue to DCU.

To facilitate entrance to DCU site which has no other access points available.

This is largely the same wording used by DCU in their original submission made in February 2021 and this was not supported by the City Manager and was rejected by council.

The City Manager was opposed to Cllr Ring's motion but the City Manager's opposition was not supported when put to a vote.

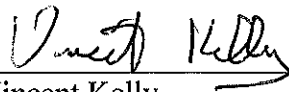
Griffith Avenue is a local and national heritage issue

Griffith Avenue is the longest double-lined avenue of trees in any European capital, originally laid out and planted nearly a century ago. It is both a local and national heritage asset. Local residents and their representative associations feel that the verges and trees must be protected at all costs as they are the essence of the avenue. DCC have stated that this rezoning is unnecessary as there are alternatives. Furthermore, the cycle lane has just been completed and another exit on to it is completely unnecessary and hazardous. The granting of this rezoning from Z9 to White Land would also create a dangerous precedent and send a signal that Griffith Avenue is vulnerable to piecemeal developments and incursions.

Submission

For the above reasons, All Hallows Area Association submits that the above proposed rezoning of the grass verge adjacent to DCU Lands, Griffith Avenue Dublin 9 Map B Map reference B-0012, from Z9 to White Land, be withdrawn and that the zoning remain as Z9. We further submit that no further rezoning proposals for Griffith Avenue be accepted until there is full consultation with the residents of the area and their representative residents' associations.

Regards,



Vincent Kelly

Vice Chairperson
All Hallows Area Association

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