



South Dublin County Council

Development Plan 2016 – 2022

Proposed Variation No.3

Zoning Objective Amendment on Lands at Ballymount / Naas Road

Planning Report

TABLE OF CONTENTS

Contents

1.0 Introduction.....	1
1.1 Introduction.....	1
1.2 Summary of the Rationale for the Proposed Variation No.3	3
1.3 Structure of Planning Report.....	4
2.0 Site Context	5
3.0 Vision for the Area and Potential of Subject Lands.....	6
4.0 Planning Policy Context.....	7
4.1 National Planning Framework.....	7
4.2 Eastern and Midland Assembly Draft Regional Spatial and Economic Strategy	8
4.3 Greater Dublin Area Transport Strategy 2016- 2035	10
4.3.1 Bus Connects (2018) – Dublin Bus Network Redesign	10
4.4 South Dublin County Council Development Plan 2016-2022.....	12
4.4.1 Core Strategy Policies and Objectives	13
4.4.2 Economic Development	14
4.4.3 Chapter 11 Implementation – Section 11.2.4 Regeneration Zone.....	18
4.4.3 Land Use Zoning and Maps	18
4.5 Naas Road Development Framework 2010.....	20
5.0 Rationale for Re- Zoning Subject Lands.....	21
5.1 National Planning Framework.....	21
5.2 Eastern and Midland Assembly Draft Regional Spatial and Economic Strategy	22
5.3 South Dublin County Council Development Plan 2016-2022.....	22
5.3.1 Land Use Zonings.....	22
5.3.2 Core Strategy Implications of the Rezoning of lands to Regeneration (REGEN)	25
5.4 Locational Advantages of the Subject Lands.....	27
5.5 Urban Regeneration Development Fund	28
6.0 Content of Proposed Variation No.3.....	29
6.1 Land Use Zoning Map Change	29
6.2 Amendment to the Core Strategy Tables.....	30
6.3 Amend Specific Local Objective.....	32
7.0 Conclusion	33

1.0 Introduction

1.1 Introduction

This Report has been prepared to set out the planning and development context and rationale for the Proposed Variation No.3 to the South Dublin County Council Development Plan 2016-2022 (the Development Plan).

Proposed Variation No 3 to the Development Plan seeks to rezone circa 178 hectares of “Enterprise and Employment ” (EE) zoned lands in the Naas Road / Ballymount area to “Regeneration” (REGEN) with an objective ‘to facilitate enterprise and/or residential led development’.

The lands primarily consist of brownfield lands with a predominant pattern of low intensity industrial/ warehousing/ car sales uses on a variety of plot sizes. The lands are located inside the M50, to the south of the Grand Canal and adjoining the Dublin City Council administrative boundary. The Naas Road (R810), the New Nangor Road (R134), the Long Mile Road (R110) and the Red Line Luas transverse the subject lands. The area lies c 6km from Dublin City Centre, c3.5 km from Tallaght and c2.5km from Clondalkin and is located within the areas of Fox and Geese, Bluebell, Ballymount, Redcow, Gallanstown and Drimnagh.

The Proposed Variation No.3 will result in the following changes to the Development Plan:

1. Amendment to the Land Use Zoning Map;
2. Amendments to the Core Strategy Tables in the written statement; and
3. Amendment of Specific Local Objective CS1 SLO1 in the written statement



Figure 1.1 Site Context

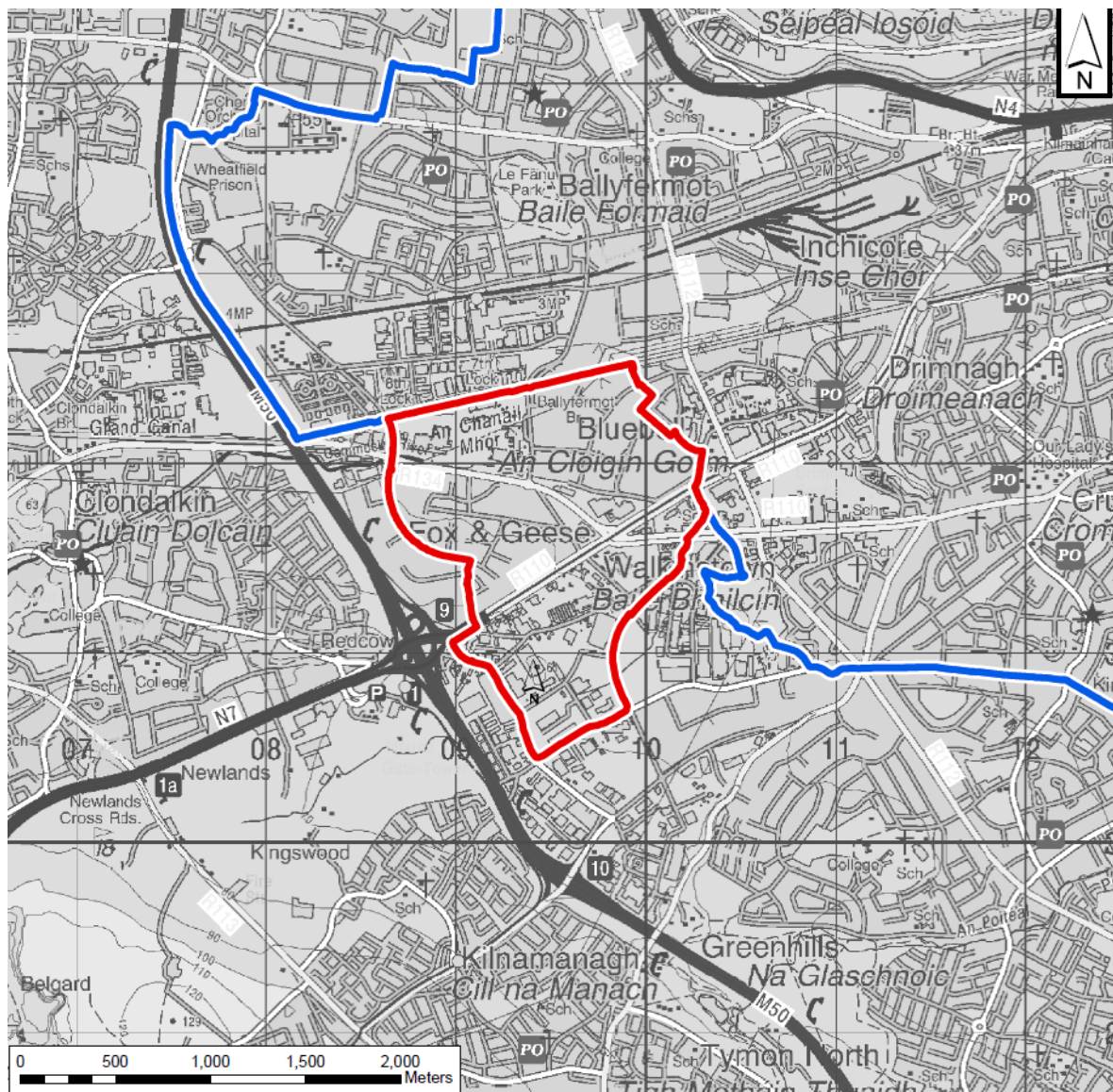


Figure 1.2 Site Location

1.2 Summary of the Rationale for the Proposed Variation No.3

Section 5.0 of this Report details the rationale for Proposed Variation No.3 under the following headings:

- 5.1 National Planning Framework (NPF);
- 5.2 Eastern and Midland Assembly (EMA) Draft Regional Spatial and Economic Strategy (RSES);
- 5.3 South Dublin County Development Plan 2016-2022;
- 5.4 Locational Advantages of the Subject Lands; and
- 5.5 Urban Regeneration Development Fund (URDF).

In summary, Proposed Variation No.3 is in response to the recent changes in National and Regional planning policy, namely the publication of the National Planning Framework (NPF) and the Eastern and Midland Assembly (EMA) Draft Regional Spatial and Economic Strategy (RSES) in 2018.

The NPF includes a National Strategic Outcome (NSO) to achieve compact growth and consolidation of Ireland's cities as a top priority. The NPF targets a significant proportion of future urban development on infill/brownfield development sites within the built footprint of existing urban areas.

In addition, the Draft RSES was published in November 2018. Consolidation and re-intensification are a key Regional Policy Objective (RPO) to provide high density and people intensive uses within the existing built up area of Dublin city and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.

Through the 'REGEN' land use zoning objective in the Development Plan, South Dublin County Council (SDCC) seeks to facilitate the regeneration of existing brownfield lands, close to existing and proposed transport nodes, to provide for a more intensive mix of enterprise and/or residential led development in accordance with the NPF.

On foot of the changing National and Regional policy context, SDCC reviewed the existing opportunities for sustainable brownfield regeneration and the compact growth in the County. As part of the analysis to inform the Two Year Progress Report on the Development Plan, it emerged that the redevelopment of underutilised brownfield lands inside the M50 have not come forward to date. The subject lands at Ballymount/ Naas Road have significant locational and infrastructural advantages over other lands in Dublin, including access to high quality public transport, services and proximity to Dublin City Centre. In the context of the objectives of the NPF and the Draft RSES, the area is considered to be a key regional transformation opportunity to support the compact development of Dublin.

The vision and ambition of SDCC for the Naas Road/ Ballymount area is to transform this brownfield area of national significance into a sustainable, vibrant, mixed use urban quarter that capitalises on its strategic location and the existing Luas Red Line, creating a sense of identity and place that reaches out and connects with the surrounding urban context. The vision for the area is to integrate land use with public transport by maximising the potential of the Luas Red line and Bus Connects radial Spine 'D' and Southern Orbital route S4.

SDCC is committed to delivering a plan led approach for the redevelopment of the area. To this end, a joint bid with Dublin City Council (DCC) has been submitted to the Minister for Housing, Planning and Local Government (the Minister) for financial assistance under the Urban Regeneration Development Fund (URDF) to support a series of studies to inform the future spatial planning of the area. The rezoning of the lands to REGEN is an integral part of the joint URDF bid and expedites future opportunities for significant capital funding for enabling infrastructure in the area.

The Proposed Variation No.3 is required to align the Development Plan with the NPF and the Draft RSES to create the conditions for redevelopment of the area in partnership with DCC. Given the complexity of the challenges to regenerating the area, Proposed Variation No 3 to the Development Plan at this time is required to provide an amended Development Plan policy framework for SDCC to proceed with the regeneration of the area. The lead in time on the regeneration of the area is likely to be medium term to long term. The Proposed Variation No.3 will enable the commencement of the masterplanning process in 2019.

The Proposed Variation No 3 lands include many existing employment uses and enterprise. The rezoning of the lands from Employment and Enterprise (EE) to Regeneration (REGEN) does not compel relocation of employment uses from the area. Rather the REGEN zoning seeks to facilitate existing employment/ enterprise uses cohabiting with residential uses in a sustainable manner. However, where land is vacant, the REGEN zoning, which facilitates residential and employment uses, will enable SDCC to bring to bear the provisions of the Vacant Site Levy to the lands in due course.

1.3 Structure of Planning Report

This Planning Report is set out as follows:

- Introduction;
- Vision and Potential of the Lands;
- Planning Policy Context;
- Rationale for the Re- Zoning;
- Content of the Proposed Variation No.3; and
- Conclusion

2.0 Site Context

The subject area has access to high quality existing and planned public transport provision, infrastructure and services and is located in close proximity to Dublin City Centre.

The subject lands were once an edge of city location in the 1970's, however, they are now situated at a strategic location within Dublin City and the wider metropolitan area. The existing land uses and pattern of development in the area are a legacy of the post World War 2, planning policy which sought to segregate industrial/manufacturing uses from residential neighbourhoods at edge city locations where the private motor car was considered to be the preferred mode of transport.

The spatial contextual background which resulted in the location of industrial/manufacturing uses at the edge of cities has changed significantly in recent decades. As more complex patterns and development in global production, trade, transport infrastructure and investment have emerged, so too has a general acceptance that a new economic order has developed in the contemporary Irish economy.

The Naas Road/ Ballymount area has remained an employment centre. However, land use in the area has evolved over time from traditional industrial/manufacturing uses to logistics/sales. The new economy in Dublin is no longer reliant on the location of industrial/manufacturing/logistics/sales companies in the Naas Road / Ballymount area.

Similar to the regeneration of underutilized Docklands areas in many global cities, the industrial edge locations are the next transformation opportunity to support the new economy and the compact development of our cities. The Naas Road/ Ballymount area is a unique opportunity to regenerate a historical industrial/manufacturing edge location in Dublin to provide for new homes, jobs, schools, community facilities and amenities in a sustainable and compact form of urban development which is served by high quality public transport and active modes.

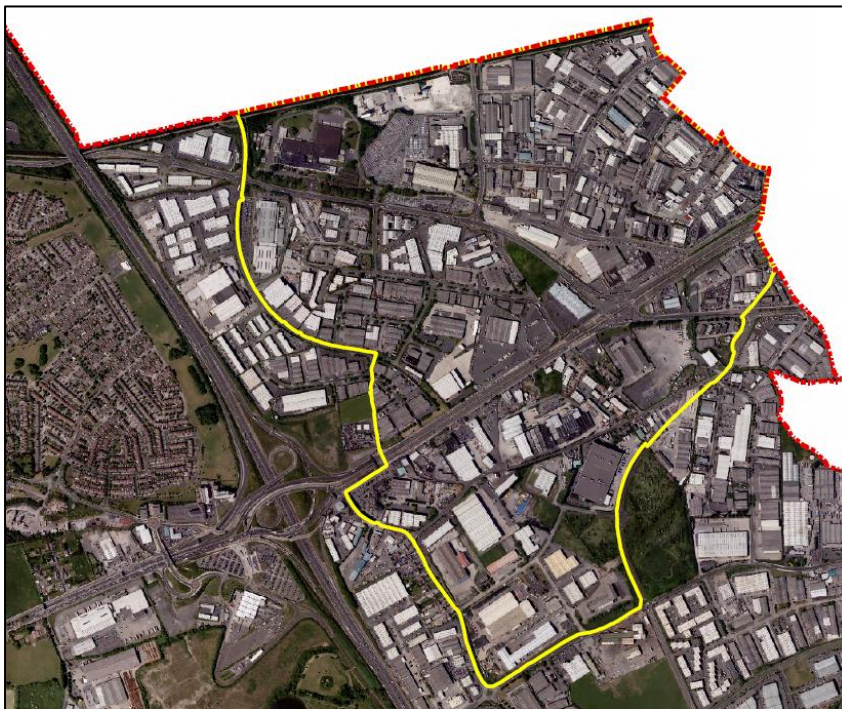


Figure 2.1 – Site Location on Aerial Photograph

3.0 Vision for the Area and Potential of Subject Lands

The vision and ambition of SDCC for the Naas Road / Ballymount lands is to transform this brownfield area of national significance into a sustainable, vibrant, mixed use urban quarter that capitalises on its strategic location, creating a sense of identity and place that reaches out and connects with the surrounding urban context. Its transformation will be a model of sustainable brownfield regeneration, incorporating mixed use neighbourhoods, a potentially diverse innovation- based economy contributing to regional and national economic prosperity, supported by exemplary social and physical infrastructure, all contained within a coherent and legible urban structure where quality of life is championed in accordance with national, regional and local government policy, plans and guidelines. The NPF and Draft RSES were published in 2018. The key objectives of both strategic policy documents is to promote the consolidation, regeneration, compact growth and re-intensification of brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin city and suburbs.

The Draft RSES references the Naas Road lands as part of the City Centre/ Docklands and South Western strategic corridors. The Naas Road lands are identified as strategic residential and employment/ mixed development opportunities in the corridors.

The rationale for the re zoning of the subject lands to the Regeneration (REGEN) land use zoning objective is derived from the national and regional policy context set out in the NPF, the Draft RSES and the historical challenges to brownfield redevelopment in the Naas Road/ Ballymount area. The potential of the area is widely recognised, by reason of its location within the M50 and the public transport provision. It is envisaged that Proposed Variation No 3 is the first step in an ambitious plan, providing a supportive local planning framework, to redevelop the area to achieve residential homes, economic growth and sustainable communities.

SDCC is committed to delivering a plan led approach for the redevelopment of the area through a strategic framework that will outline a compact and smart growth based approach to the realisation of the area's full potential. To this end, a joint bid with DCC has been submitted to the Minister for financial assistance under the URDF. A Category B bid to the value of €437,500 was submitted to the DHPLG in September 2018 to support a series of studies to inform the future spatial planning of the area, including a Transport Assessment and Strategy, an Economic Viability Study, a Surface Water Management Strategy, a Flood Risk Assessment and a Constraints Study. The aim of the Category B funding is to development proposals that support the implementation of the NPF that may be initiated in 2019 or subsequent years to a 'ready to go' status for Category A funding.

The subject lands at Ballymount/ Naas Road have significant locational, policy and infrastructural advantages over other lands in Dublin. The subject area has access to high quality public transport, including Luas Red line, and is located in close proximity to Dublin City Centre. In the context of the objectives of the NPF and the Draft RSES, the area is considered to be a key regional transformation opportunity to support the compact development of Dublin.

4.0 Planning Policy Context

This section of the Report provides a broad overview of the relevant national, regional and local planning policy.

4.1 National Planning Framework

The National Planning Framework (NPF) is a Government plan for action and delivery between now and 2040 called “Ireland 2040 - Our Plan”. The document was published in July 2018 and replaces the National Spatial Strategy (NSS).

The NPF, supported by the National Development Plan (NDP), is the Government’s high level strategic plan for shaping the future growth and development of the country to the year 2040.

The NPF sets out 10 National Strategic Outcomes and 75 National Policy Objectives.



Figure 4.1 – Extract from National Planning Framework of the National Strategic Outcomes

Further to the 10 National Strategic Outcomes above, the following National Policy Objectives are considered relevant in this context:

National Policy Objective 2a

A target of half (50%) of future population and employment growth will be focused in the existing five Cities and their suburbs.

National Policy Objective 3a

Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.

National Policy Objective 3b

Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.

National Policy Objective 3c

Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints¹⁹.

National Policy Objective 4

Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.

National Policy Objective 5

Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.

National Policy Objective 6

Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.

National Policy Objective 33

Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

4.2 Eastern and Midland Assembly Draft Regional Spatial and Economic Strategy

The Eastern and Midland Assembly Draft Regional Spatial and Economic Strategy (Draft RSES) supports the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin City and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.

A RSES is a strategic plan which identifies regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives. At this strategic level it provides a framework for investment to better manage regional planning and economic development throughout the Region. The principal statutory purpose of the RSES is to support the implementation of Project Ireland 2040 - The NPF and NDP, and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the regions.

The Growth Strategy for the Eastern and Midland Region will:

- Support the continued growth of Dublin as our national economic engine; and
- Deliver sustainable growth of the Metropolitan Area through the Dublin Metropolitan Area Strategic Plan (MASP).

To achieve ambitious compact development targets of at least 50% of all new homes within or contiguous to the existing built up area in Dublin and 30% in other settlements, the MASP identifies strategic residential, employment and regeneration development opportunities along with the

requisite infrastructure investment needed to ensure a steady supply of sites in tandem with the delivery of key public transport projects as set out in the NDP.

The MASP identifies strategic residential and employment development corridors based on their capacity to achieve compact sustainable and sequential growth along key public transport corridors, existing and planned to achieve the creation of sustainable compact communities with improved housing choice, access to social and economic opportunities, enhanced services and amenities for a resident population of some 1.65m people in the metropolitan area by 2031.

The subject lands of Proposed Variation No 3 forms part of the City Centre/ Docklands and South Western strategic corridors. The Naas Road lands are identified as strategic residential and employment/ mixed development opportunities in the corridors.

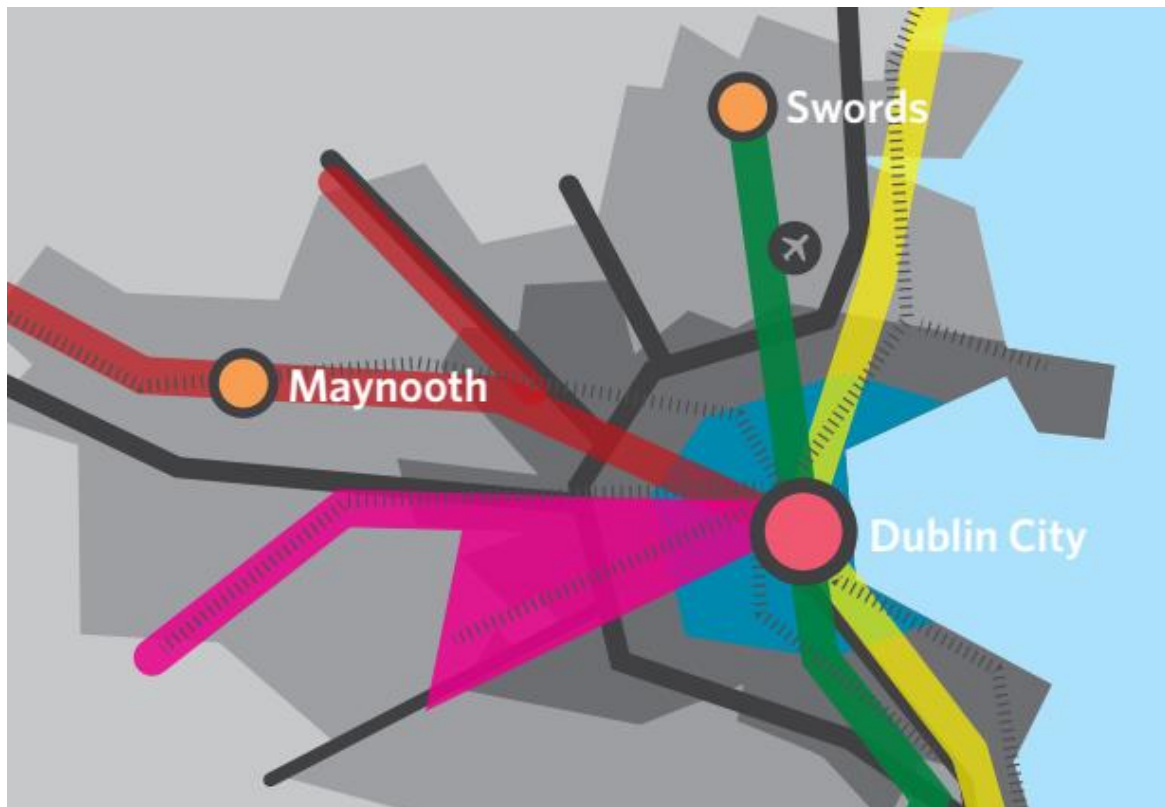


Figure 4.2 – Extract from Draft Regional Spatial and Economic Strategy

4.3 Greater Dublin Area Transport Strategy 2016- 2035

The National Transport Authority (NTA) Greater Dublin Area Transport Strategy 2016- 2035 (the Strategy) establishes the framework for the transport provision necessary to achieve the land use vision set out for the region. The purpose of the Strategy is to contribute to the objectives of the region by providing for the efficient, effective and sustainable movement of people and goods. The Strategy outlines the transport infrastructure required across all modes by 2035 within the GDA to achieve this objective.

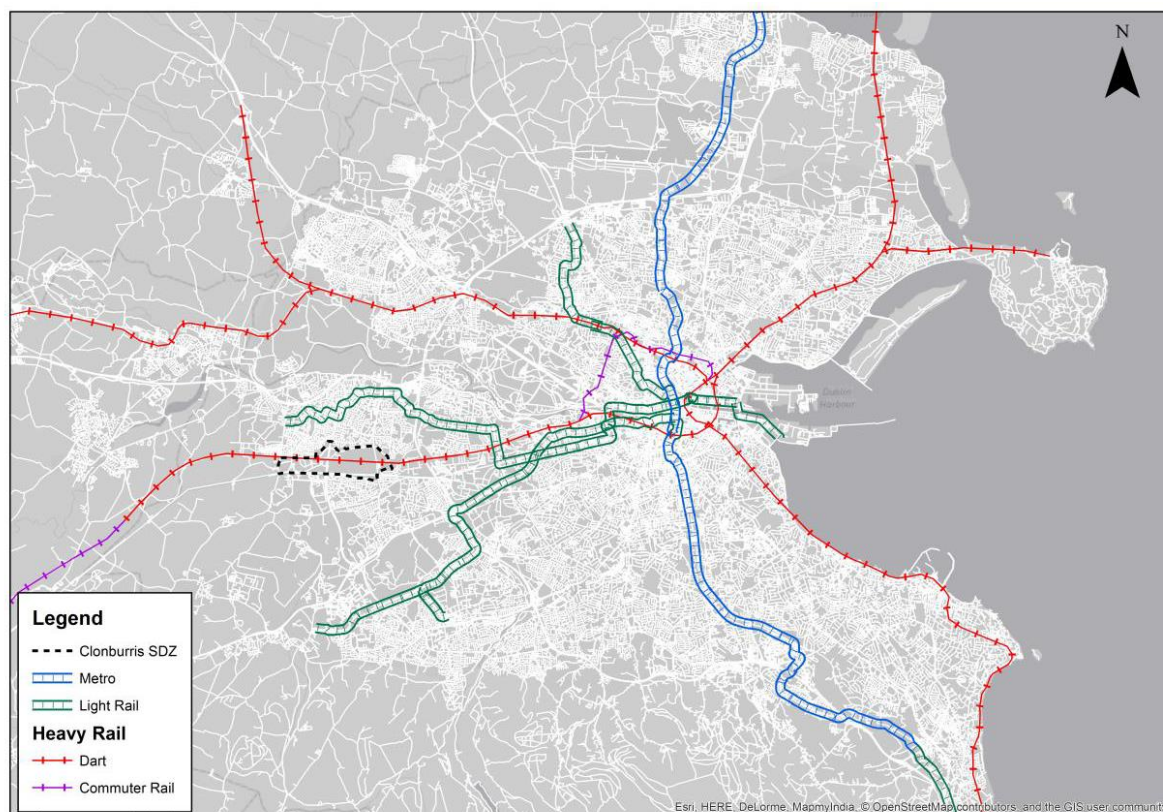


Figure 4.3 2035 Core Rail Network Map from Greater Dublin Area Transport Strategy

4.3.1 Bus Connects (2018) – Dublin Bus Network Redesign

The proposals aim to put bus services at the heart of the solution when it comes to addressing congestion in Dublin. The aim is to redesign the bus system to make it more useful to more people. In other words to enable more people to get to more places, sooner, than they currently can by bus.

BusConnects proposals include:

- Next generation bus corridors;
- Bus Rapid Transit;
- Redesigning the network of bus routes;
- State-of-the-art ticketing system;
- Cashless fare payment system;
- Simpler fare structure;
- Refreshing the bus livery;
- Rolling out new bus stops with better signage and information; and
- Cleaner technology.

The subject area is served by radial Spine 'D', radial route 20 and Southern Orbital Route S4.

MAP 2 - Proposed Network: Big Picture

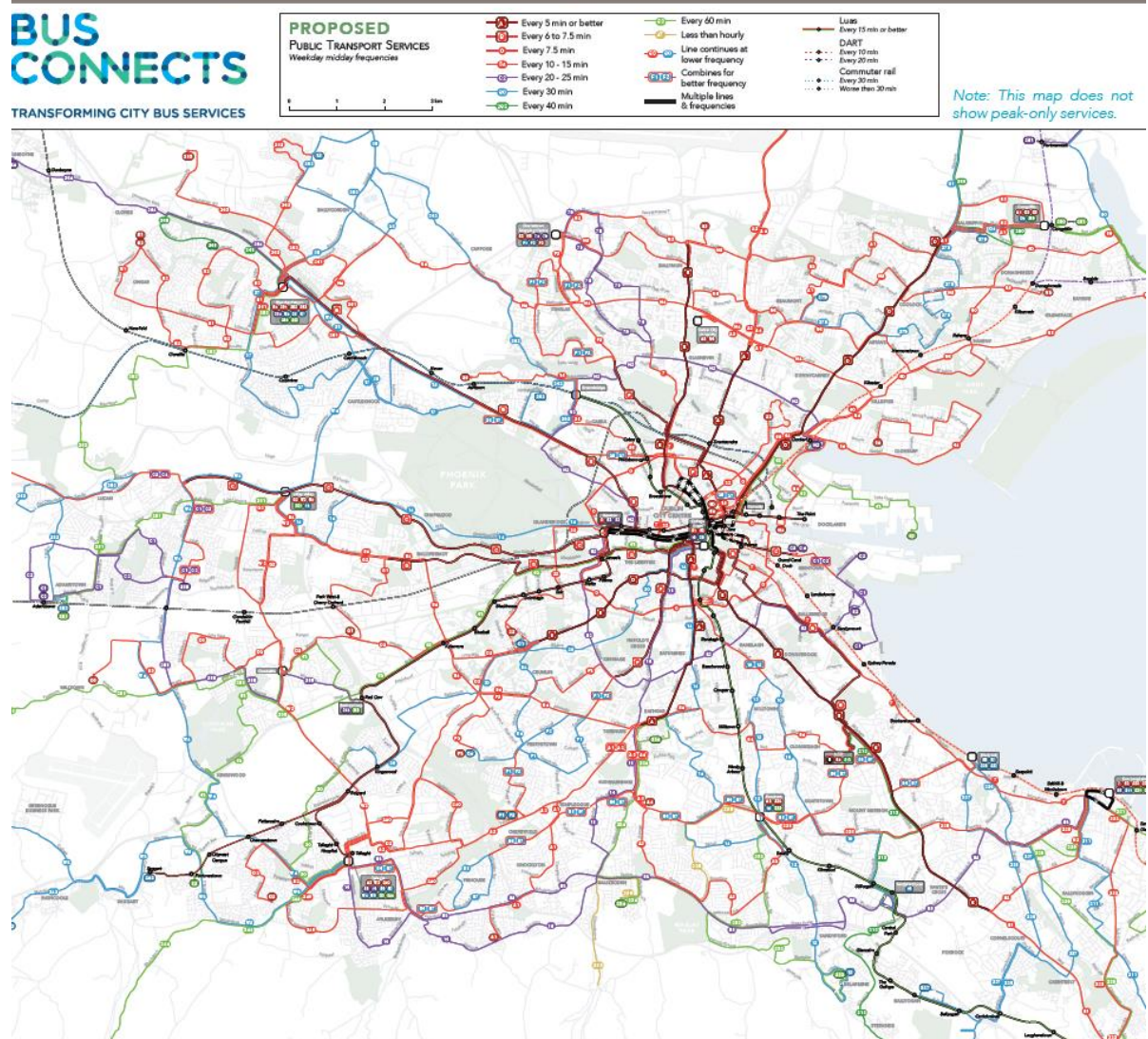


Figure 4.4 Proposed Bus Network in Bus Connects

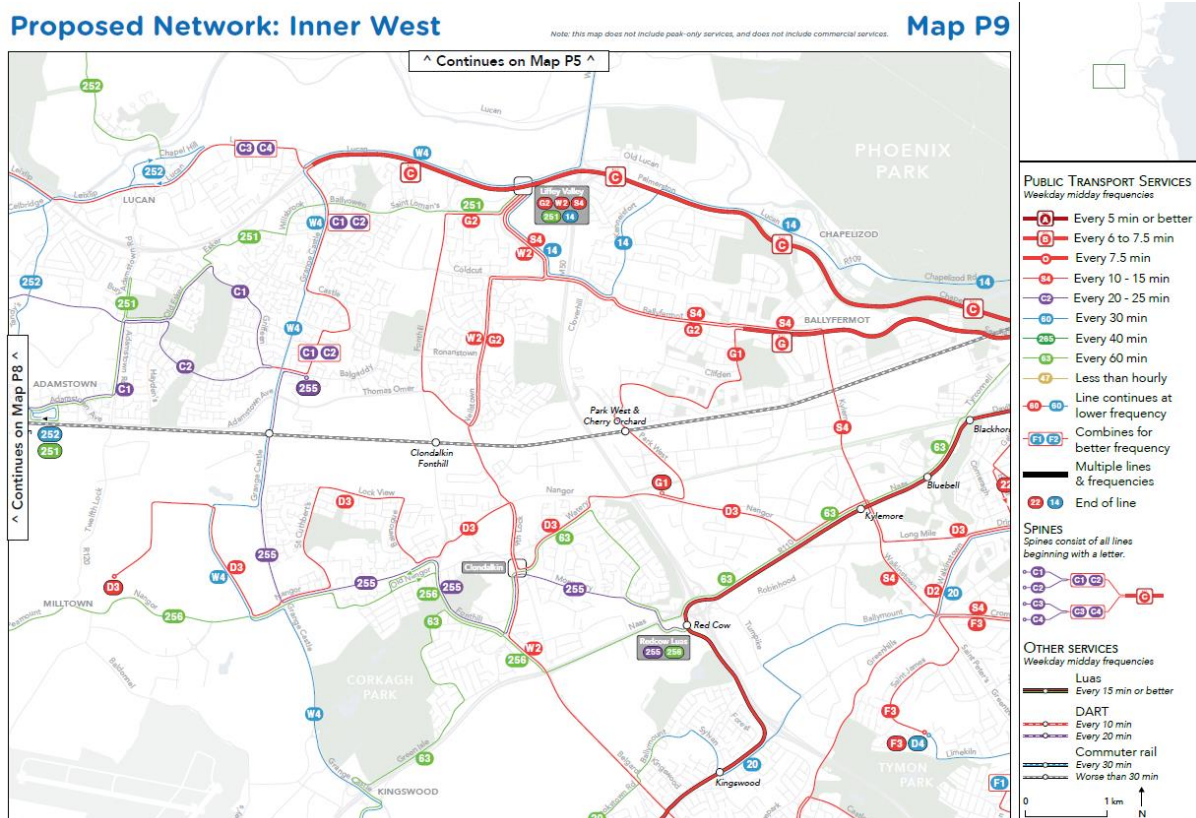


Figure 4.5 Inner West Proposed Bus Network in Bus Connects

4.4 South Dublin County Council Development Plan 2016-2022

The Development Plan sets out an overall strategy for the proper planning and sustainable development of the County and consists of a written statement and accompanying plans and maps. The policies and objectives of the Development Plan are underpinned by the following overarching considerations:

- (a) *Quality of Life, with an emphasis on key economic, environmental, social and cultural indicators;*
- (b) *Prosperity, with an emphasis on contributing to a competitive business environment that supports economic development, job creation and prosperity for all;*
- (c) *Sustainability, with an emphasis on making better use of key resources such as land, buildings, water, energy, waste and transport infrastructure;*
- (d) *Health and Wellbeing, by facilitating active and healthy lifestyles with increased opportunities for walking, cycling and active sport and recreation;*
- (e) *Social Inclusion, with an emphasis on creating socially and physically inclusive neighbourhoods, taking account of the recommendations of The National Disability Strategy Implementation Plan 2013-2015 and Inclusion Ireland's Changing Places campaign; and*
- (f) *Climate Change Adaptation, with increased emphasis on reducing climate change at a local level through settlement and travel patterns, energy use and protection of green infrastructure.*

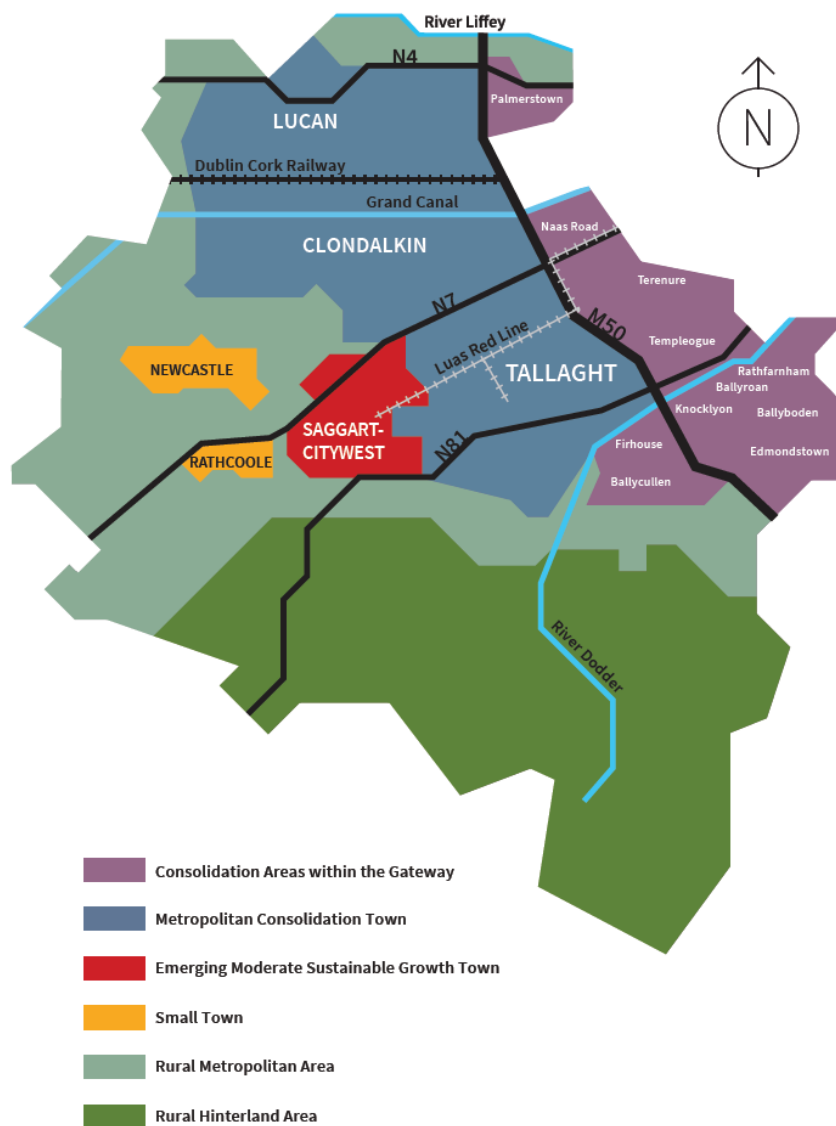


Figure 4.6 South Dublin County Core Strategy Map

4.4.1 Core Strategy Policies and Objectives

The following policies and objectives are relevant to the Proposed Variation No 3:

CORE STRATEGY (CS) Policy 1 Consolidation Areas within the Gateway outlines that it is the policy of the Council to promote the consolidation and sustainable intensification of development to the east of the M50 and south of the River Dodder.

CS1 Objective 2:

To promote and support the regeneration of underutilised industrial areas in areas designated with Zoning Objective Regeneration 'REGEN' (to facilitate enterprise and/or residential led development).

Section 1.8.0 Phasing, Prioritisation and Infrastructure Delivery

In terms of phasing, planning prioritisation and infrastructure delivery it is advised that:

'...4) Underutilised industrial lands that are close to town centres and transport nodes are designated with Zoning Objective Regeneration 'REGEN' (to facilitate enterprise and/or residential led regeneration). These lands are serviced and offer significant potential for more intensive employment and/or residential development and associated uses. The transition from underutilised industrial areas is likely to occur on an incremental basis and may need to be supported by an economic regeneration strategy. It is envisaged that not more than 50% of these areas will come forward for housing during the period 2016-2022.'

Section 1.9.0 Local Area Plans, Approved Plans and Studies

CORE STRATEGY (CS) Policy 6 Local Area Plans

It is the policy of the Council to prepare Local Area Plans as appropriate, and to prioritise areas that are likely to experience large scale residential or commercial development or regeneration.

CS6 Objective 2:

To support a plan led approach in Local Area Plan areas by ensuring that development complies with the specific local requirements of the Local Area Plan, in addition to the policies and objectives contained in this Development Plan.

CS6 SLO 1:

To prepare a Ballymount Local Area Plan for lands zoned REGEN, EE, and LC, stretching southwest from Walkinstown Roundabout along the Greenhills Road (including those areas adjacent to Greenhills Estate) to the M50, north from there to the Red Cow, east from there along the Naas Road to the city boundary, and along the boundary back to Walkinstown Roundabout. The subject Local Area Plan to be concluded by the end of 2018; and the lands north of this between the M50, the Grand Canal and city boundary currently zoned EE to be considered for inclusion in this plan. The Naas Road Framework Plan (2010) to be taken into consideration during the preparation of the Local Area Plan.

4.4.2 Economic Development

The following sections, policies and objectives of the Development Plan are relevant to Proposed Variation No 3:

Section 4.1.1 Employment

South Dublin County has a strong and diverse economic base. The county is home to 6,823 business entities and almost 78,000 jobs. Retailing, transportation and distribution, industry and manufacturing, professional and financial services, medical and pharmaceuticals are the key economic sectors in the County, with tourism, recreation and agricultural sectors representing only 3% of all businesses at present.

Economic activity is focused into enterprise lands and urban centres for the most part, with a number of identifiable economic clusters.

- A series of older industrial areas along the Luas Corridor, at Naas Road, Ballymount and Cookstown accommodate a diverse range of small and medium sized enterprises and industries. These areas, although large employment centres, are facing issues of evolutionary renewal. The Council will seek to support the regeneration of older industrial areas on a phased basis by promoting more intensive enterprise and/or residential led development at locations proximate to town centres and transport nodes.*

Section 4.2.0 Strategic Policy For Employment

It is the policy of the Council to facilitate and support the growth of the economy of South Dublin County and the Greater Dublin Area in a sustainable manner whilst maintaining and improving environmental quality with the following key aims:

- *To strengthen existing employment centres;*
- *To strengthen the integration between employment, housing and transportation with a view to promoting compact urban areas and reducing car dependency;*
- *To support high-value jobs as companies seek to move up the value chain and undertake higher value-added activities in Ireland.*
- *To facilitate economic growth by consolidating existing industrial and commercial areas and by ensuring that there is an adequate supply of serviced employment lands at suitable locations.*
- *To promote the regeneration of underutilised industrial areas in a manner which enhances the local economy and encourages a sequential approach to development;*
- *To provide for a range of business accommodation types, including units suitable for small business.*

Section 4.3.0 Employment Location Categories

Whilst a range of employment uses are generally permitted in principle or open for consideration across a range of land use zonings, the County Development Plan seeks to guide enterprise and employment development to appropriate locations by identifying economic clusters and setting out policies and objectives for the future development of these areas.

There are over 1,000 hectares of land zoned for enterprise and employment related uses in the County. Variation No.1 of the Development Plan extended the available 'EE' lands in the County at Grangecastle West. The Regeneration 'REGEN' Zoning Objective is applied to underutilised industrial lands that are close to town and district centres and transport nodes and have potential for more intensive forms of development. There is significant potential for the redevelopment and intensification of these lands for enterprise and/or residential led development. Figure 4.7 from the Development Plan shows the Enterprise and Employment Opportunities in South Dublin County and it is noteworthy that the EE and REGEN zonings are both included.

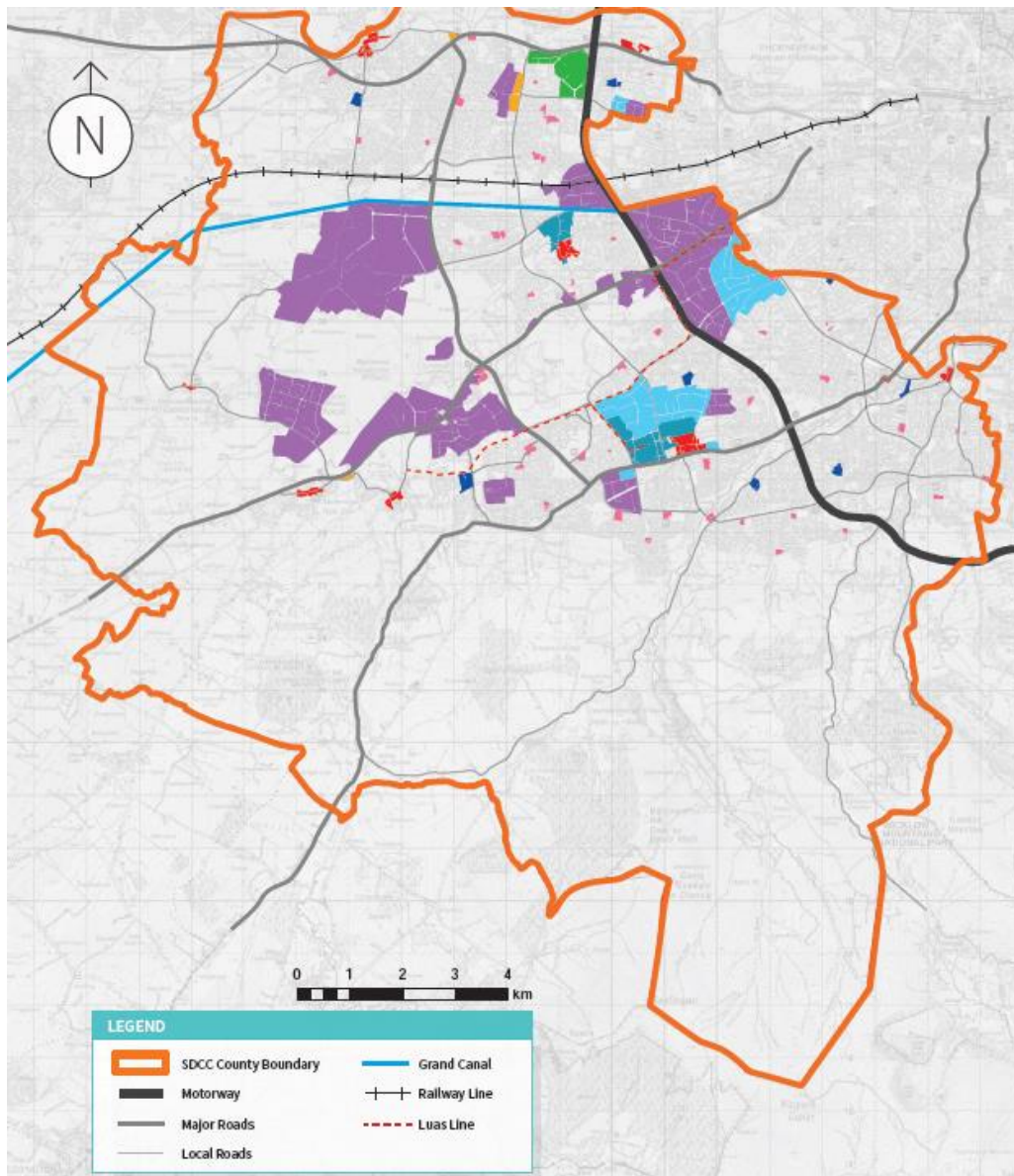


Figure 4.7 South Dublin Enterprise and Employment Opportunities

ECONOMIC AND TOURISM (ET) Policy 1 Overarching

It is the policy of the Council to support sustainable enterprise and employment growth in South Dublin County and in the Greater Dublin Area, whilst maintaining environmental quality.

ET1 Objective 1:

To ensure that there is a sufficient supply of zoned and serviced lands at suitable locations to accommodate a range of enterprise and employment development types.

ET1 Objective 2:

To promote enterprise and employment development at locations that are proximate to or integrated with transportation and other urban land uses, to promote compact urban development and sustainable transport.

ET1 Objective 3:

To support the continued development of economic clusters to the west of the County by prioritising compatible and complementary enterprise and employment uses that would not undermine the established character of these areas.

ET1 Objective 4:

To support the renewal of underutilised industrial areas to the east of the M50 and in proximity to Tallaght and Clondalkin Town Centres.

ET1 Objective 5:

To support a balanced distribution of economic and tourism opportunities throughout the County by promoting areas of high unemployment and socioeconomic disadvantage as viable locations for enterprise and employment growth in the County.

ET1 Objective 6:

To direct people intensive enterprise and employment uses such as major office developments (>1,000sq.m gross floor area) into lands zoned Town Centre and Regeneration Zones in Tallaght, lands zoned Town Centre in Clondalkin and also to lands zoned District Centre and Enterprise and Employment, and Regeneration Zones subject to their location within 400 metres of a high capacity public transport node (Luas/Rail), quality bus service and/or within 800 metres walking distance of a Train or Luas station, the latter requiring demonstration of required walking distance or provision of a permeability project, in accordance with the Permeability Best Practice Guide (2013), to achieve same.

ET1 Objective 7:

To restrict enterprise and employment development at locations that are environmentally sensitive or at risk of flooding.

Section 4.3.2 Employment and Residential in Regeneration Zones

ECONOMIC AND TOURISM (ET) Policy 2 Enterprise and/or Residential Led Development in Regeneration Zones.

It is the policy of the Council to facilitate and support the regeneration of underutilised industrial areas that are proximate to urban centres and transport nodes and to promote and support more intensive compatible employment and/or residential led development in regeneration zones.

ET2 Objective 1:

To promote and support the consolidation or relocation of existing employment uses in Regeneration 'REGEN' zones and the upgrade of these areas to create opportunities for regeneration.

ET2 Objective 2:

To support proposals for more intensive compatible enterprise and/or residential led development on lands designated with Zoning Objective 'REGEN', subject to appropriate design safeguards and based on a traditional urban form that adhere to urban design criteria.

ET2 Objective 3:

To support proposals for incubator, starter and/or live work units on lands designated with Zoning Objective 'REGEN' (to facilitate enterprise and/or residential led regeneration).

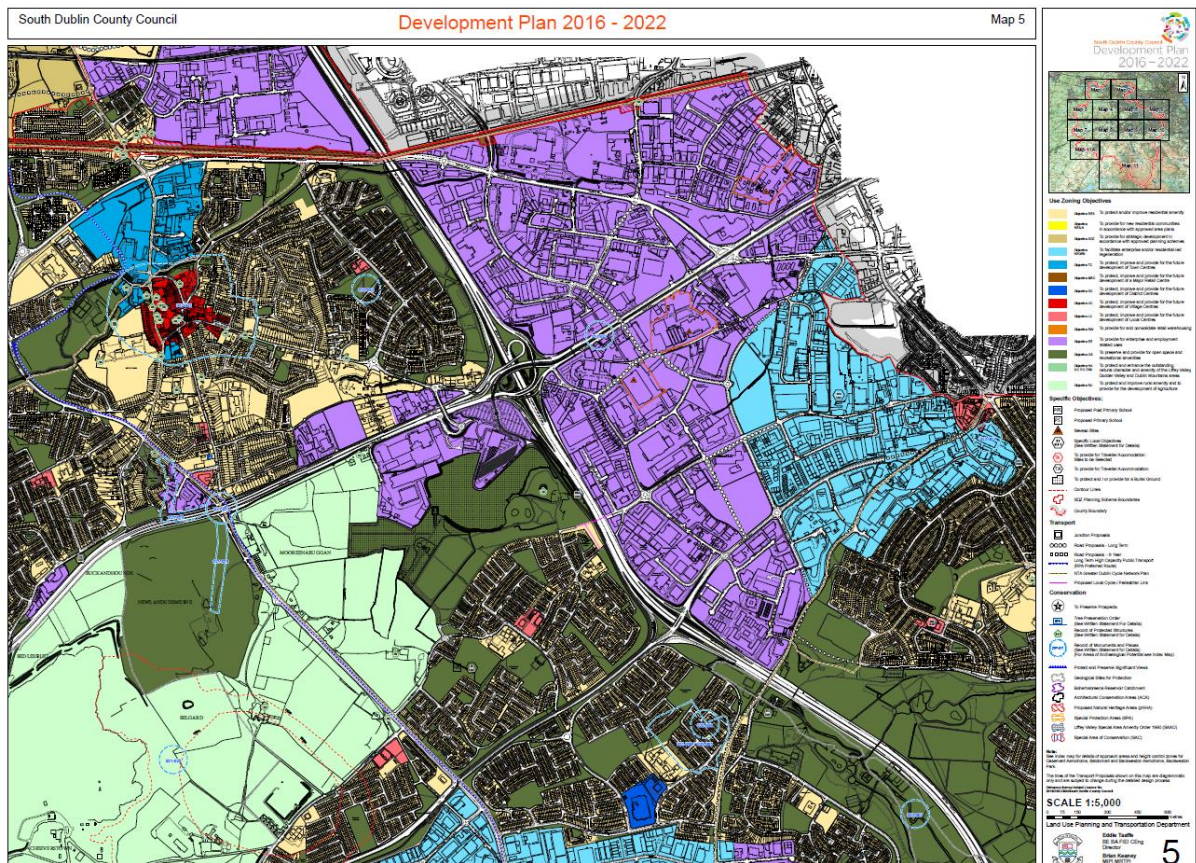
4.4.3 Chapter 11 Implementation – Section 11.2.4 Regeneration Zone

Development in Regeneration zones will be assessed against the relevant criteria within the Urban Design Manual, the Design Manual for Urban Roads and Streets and/or the Retail Design Manual as appropriate. A Design Statement (see Section 11.2.1 Design Statements) accompanying development proposals in Regeneration (REGEN) zones should also address the following criteria:

- *Demonstrate a clear transition towards a more urban form of development and a traditional street network.*
- *Address connectivity and linkages in the area and demonstrate that the development of the site would not give rise to isolated piecemeal pockets of residential development that are disconnected from shops, amenities and/or other residences.*
- *Residential development should not be introduced at ground floor level adjacent to busy roads, and/or roads that are subject to significant movements by Heavy Goods Vehicles (HGVs).*
- *Given the transitional nature of Regeneration zones, precautions will be taken to ensure that the potential for noise pollution, air pollution or other nuisance from established industrial uses will not exceed acceptable environmental standards. The Planning Authority may seek a report from a suitably qualified person to identify and quantify sources of noise pollution, air pollution, or nuisance, assess the potential impacts on the proposed development and provide a series of recommendations to mitigate the impacts of any pollutants insofar as possible (e.g. orientation and layout of dwellings, positioning of openings and insulation).*
- *It may be necessary to consider improvements to the surrounding road and street network in conjunction with the Planning Authority, to calm traffic and improve pedestrian and cyclist access.*

4.4.3 Land Use Zoning and Maps

The proposed site is currently zoned Enterprise and Employment (EE) within the Development Plan with the objective 'to provide for enterprise and employment related uses'. An extract from the Development Plan map is shown in Figure 4.8.



4.5 Naas Road Development Framework 2010

In 2010, SDCC published the Naas Road Development Framework (NRDF). The NRDF is a non-statutory study which sets out a concept for the future regeneration of the area.

The key elements of the NRDF are:

- To consolidate most new development east of the M50, with mixed uses focused around the existing Red Cow Luas stop;
- To maintain the Green Belt between Clondalkin and Tallaght;
- To provide a proposed new Luas stop between Red Cow and Kylemore; and
- To provide a new road links east of the M50.

The NRDF sets out an urban vision for the subject area with objectives relating to density and plot ratio. A series of Character Areas are identified focused on using placemaking as the catalyst for regeneration of the area.

The NRDF vision is to shift the character of the area from a mono use employment area to that of mixed use. The area inside the M50 will become a mix of residential, commercial and industrial uses to varying degrees.

Since 2010, the planning policy and legislative context for the subject lands has substantially changed with a range of new policy and guidance coming forward, including Section 28 Guidelines, National and Regional Strategies, Climate Change, Planning legislation, environmental legislation and flood risk assessment. The Proposed Variation No.3 seeks to build on the principles of the NRDF. However, as outlined above, the non-statutory NRDF study is considered to be dated from a policy context. Furthermore, the NRDF has not been subject to the robust and iterative environmental assessment of SEA, AA and SFRA processes.

5.0 Rationale for Re- Zoning Subject Lands

5.1 National Planning Framework

As outlined in Section 4.0, the NPF includes a range of National Strategic Outcomes and National Policy Objectives. Of particular relevance to the Naas Road/ Ballymount area is the focus in the NPF on the strengthening and regeneration of underutilised urban areas. This is expressed through policies which support the creation of high quality urban places of scale and requirements to direct a specific percentage of future growth into the existing Dublin City footprint. The proposed regeneration of the subject lands implements a range of National Strategic Outcomes (NSO), in particular the following:

NSO No. 1 Compact Growth

The regeneration and sustainable development of the Naas Road/ Ballymount area presents an opportunity to meet the needs of the wider City and Region, presenting opportunities to accommodate the Region's growing population and provide greater choice for housing and employment, focused on liveability and quality of life. Having regard to the Core Strategy of the Development Plan and the designation of the lands in the Consolidation Area within the Gateway, the Naas Road / Ballymount lands have the capacity to yield a significant quantum of housing and employment supply, which reinforces the principles of the NPF by delivering smart and compact growth within the built-up envelope of an existing urban area.

The Naas Road / Ballymount area is a key growth enabler in the Dublin City and Metropolitan Area – and comprises key attributes to contribute to the compact growth of Dublin City – it comprises a large scale underutilised area with potential for regeneration to provide new homes and employment opportunities.

The regeneration of the Naas Road/ Ballymount area is aligned to the compact growth objectives of national and regional policy and guidance. In this regard, the legacy of the rezoning aims to leverage and incentivise a greater proportion of residential and commercial development inside the M50 area, supported by new and existing infrastructure, services and amenities.

NSO No. 4 Sustainable Mobility

In line with Ireland's Climate Change mitigation plan, the country needs to progressively electrify our mobility systems moving away from polluting and carbon intensive propulsion systems to new technologies such as electric vehicles and introduction of electric and hybrid traction systems for public transport fleets, such that by 2040 our cities and towns will enjoy a cleaner, quieter environment free of combustion engine driven transport systems.

The future compact sustainable growth of the Naas Road / Ballymount lands is reliant on the provision of a well-functioning, integrated public transport system, thereby enhancing competitiveness and enabling sustainable mobility choices for existing and future citizens. The Naas Road/ Ballymount area faces the challenge of overcoming physical barriers to prepare a plan led approach integrating sustainable transport and land use. In this context, the amendment to the existing Specific Local Objective (SLO) to promote a plan led approach is required.

5.2 Eastern and Midland Assembly Draft Regional Spatial and Economic Strategy

Consolidation and re-intensification is a key Regional Policy Objective to provide high density and people intensive uses within the existing built up area of Dublin city and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.

The Growth Strategy for the Eastern and Midland Region will:

- Support the continued growth of Dublin as our national economic engine; and
- Deliver sustainable growth of the Metropolitan Area through the Dublin Metropolitan Area Strategic Plan (MASP).

The MASP identifies strategic residential and employment development corridors based on their capacity to achieve compact sustainable and sequential growth along key public transport corridors. The Naas Road lands form part of the City Centre and South Western strategic corridors and are identified as strategic residential and employment/ mixed use development opportunities in the corridors. In this context, the Proposed Variation No.3 supports the delivery of the RSES.

5.3 South Dublin County Council Development Plan 2016-2022

5.3.1 Land Use Zonings

The proposed site is currently zoned Enterprise and Employment (EE) within the Development Plan with the objective *'to provide for enterprise and employment related uses'*. An extract from the Development Plan map is shown in Figure 5.1. Table 5.1 shows the Land Use Zoning Table for the Enterprise and Employment (EE) objective.

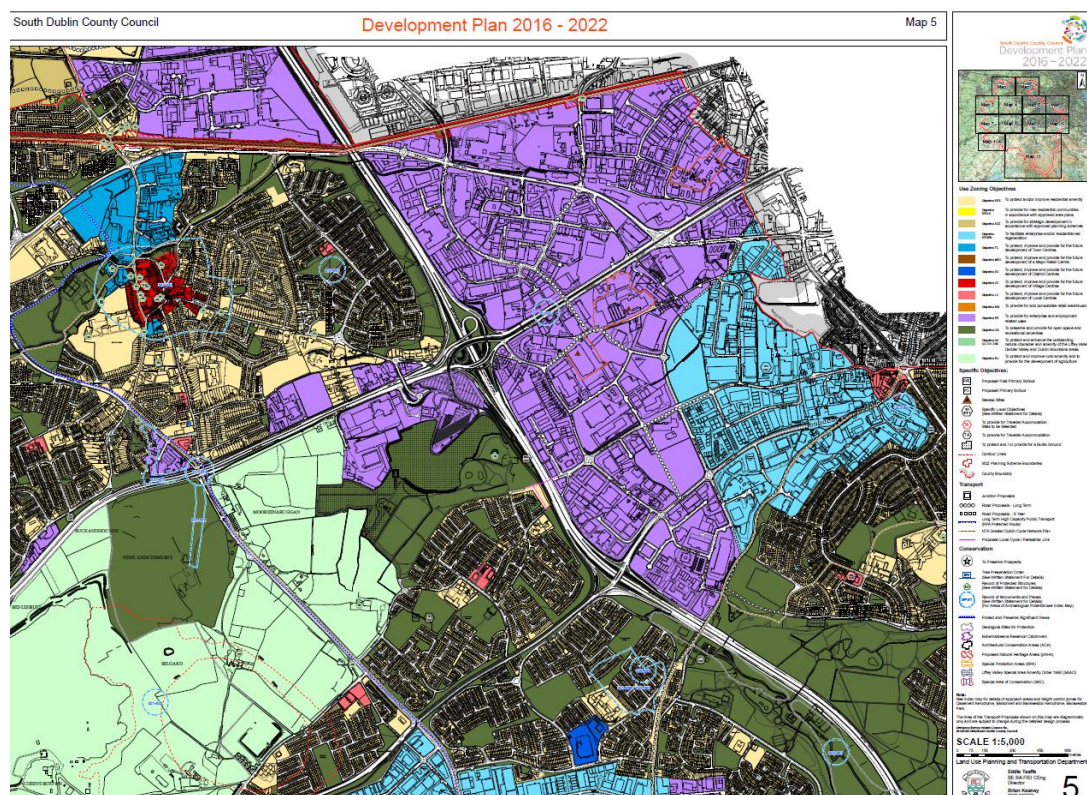


Figure 5.1 – Extract from South Dublin County Council Development Plan 2016 – 2022 Land Use Zoning Map

USE CLASSES RELATED TO ZONING OBJECTIVE 'EE' to provide for enterprise and employment related uses'	
Permitted in Principle	Abattoir, Advertisements and Advertising Structures, Boarding Kennels, Enterprise Centre, Fuel Depot, Heavy Vehicle Park, Home Based Economic Activities, Industry-General, Industry-Light, Industry-Special, Office-Based Industry, Office less than 100 sq.m, Open Space, Petrol Station, Public Services, Recycling Facility, Refuse Transfer Station, Science and Technology Based Enterprises, Scrap Yard, Service Garage, Shop-Local, Transport Depot, Traveller Accommodation, Warehousing, Wholesale Outlet.
Open for Consideration	Agriculture, Allotments, Car Park, Childcare Facilities, Concrete/Asphalt Plant in or adjacent to a Quarry, Garden Centre, Hotel/Hostel, Industry-Extractive, Motor Sales Outlet, Nightclub, Offices 100 sq.m - 1,000 sq.m, Offices over 1,000 sq.m, Public House, Refuse Landfill/Tip, Restaurant/Café, Retail Warehouse, Social Club, Sports Club/Facility, Stadium, Veterinary Surgery.
Not Permitted	Aerodrome/Airfield, Bed & Breakfast, Betting Office, Camp Site, Caravan Park-Residential, Cemetery, Community Centre, Conference Centre, Crematorium, Cultural Use, Doctor/Dentist, Education, Embassy, Funeral Home, Guest House, Health Centre, Hospital, Housing for Older People, Live-Work Units, Nursing Home, Off-Licence, Outdoor Entertainment Park, Place of Worship, Primary Health Care Centre, Recreational Facility, Residential, Residential Institution, Retirement Home, Rural Industry-Food, Shop-Major Sales Outlet, Shop-Neighbourhood, Wind Farm.

Table 5.1: South Dublin County Council Development Plan 2016 – 2022 Land Use Table for Zoning Objective 'EE': 'To provide for enterprise and employment related uses'

In the context of the Naas Road/ Ballymount location, the 'EE' zoning objective is restrictive and prohibits the development of certain uses including (inter alia); residential, hospital, health centre, primary health care centre, live-work units, Shop – major sales outlet, shop neighbourhood, recreational facility, cultural use, community centre, doctor / dentist and guest house.

The proposed zoning for the subject lands is Regeneration (REGEN) with an objective 'To facilitate enterprise and/or residential-led regeneration' (see Figure 5.2). The area subject of the Proposed Variation No 3 lies adjacent to and would constitute an extension of the existing REGEN zoning objective to the south east which serves 'To facilitate enterprise and/or residential-led regeneration'.

The Development Plan provides zoning objectives to support development to meet the Core Strategy requirements, should economic, market and demographic factors warrant this level of output. Most significantly, the Development Plan introduced a Regeneration zoning objective 'REGEN' to support and facilitate the regeneration of underutilised industrial lands that are proximate to town centres and/or public transport nodes for more intensive enterprise and residential led development.

The subject lands will provide additional opportunities for compact growth and sustainable intensification in established urban areas, through brownfield redevelopment on 'REGEN' zoned lands. Table 5.2 shows the Land Use Zoning Table for the Regeneration (REGEN) objective.

USE CLASSES RELATED TO ZONING OBJECTIVE 'REGEN' 'To facilitate enterprise and/or residential-led regeneration'	
Permitted in Principle	Advertisements and Advertising Structures, Childcare Facilities, Community Centre, Education, Enterprise Centre, Health Centre, Home Based Economic Activities, Hotel/Hostel, Housing for Older People, Industry-Light, Live-Work Units, Motor Sales Outlet, Office-Based Industry, Office less than 100 sq.m, Offices 100 sq.m –1,000 sq.m, Offices over 1,000 sq.m, Open Space, Petrol Station, Public Services, Recreational Facility, Residential, Restaurant/Café, Residential Institution, Science and Technology Based Enterprise, Shop-Local, Sports Club/Facility, Stadium, Traveller Accommodation.
Open for Consideration	Allotments, Bed & Breakfast, Betting Office, Boarding Kennels, Car Park, Crematorium, Cultural Use, Doctor/Dentist, Embassy, Funeral Home, Garden Centre, Guest House, Hospital, Industry-General, Nursing Home, Off-Licence, Place of Worship, Primary Health Care Centre, Public House, Recycling Facility, Retail Warehouse, Retirement Home, Service Garage, Shop-Neighbourhood, Social Club, Veterinary Surgery, Warehousing, Wholesale Outlet.
Not Permitted	Abattoir, Aerodrome/Airfield, Agriculture, Camp Site, Caravan Park-Residential, Cemetery, Concrete/Asphalt Plant in or adjacent to a Quarry, Conference Centre, Fuel Depot, Heavy Vehicle Park, Industry-Extractive, Industry-Special, Nightclub, Outdoor Entertainment Park, Refuse Landfill/Tip, Refuse Transfer Station, Rural Industry-Food, Scrap Yard, Shop-Major Sales Outlet, Transport Depot, Wind Farm.

Table 5.2: South Dublin County Council Development Plan 2016 – 2022 Land Use Table for Zoning Objective 'REGEN': 'To facilitate enterprise and/or residential-led regeneration'

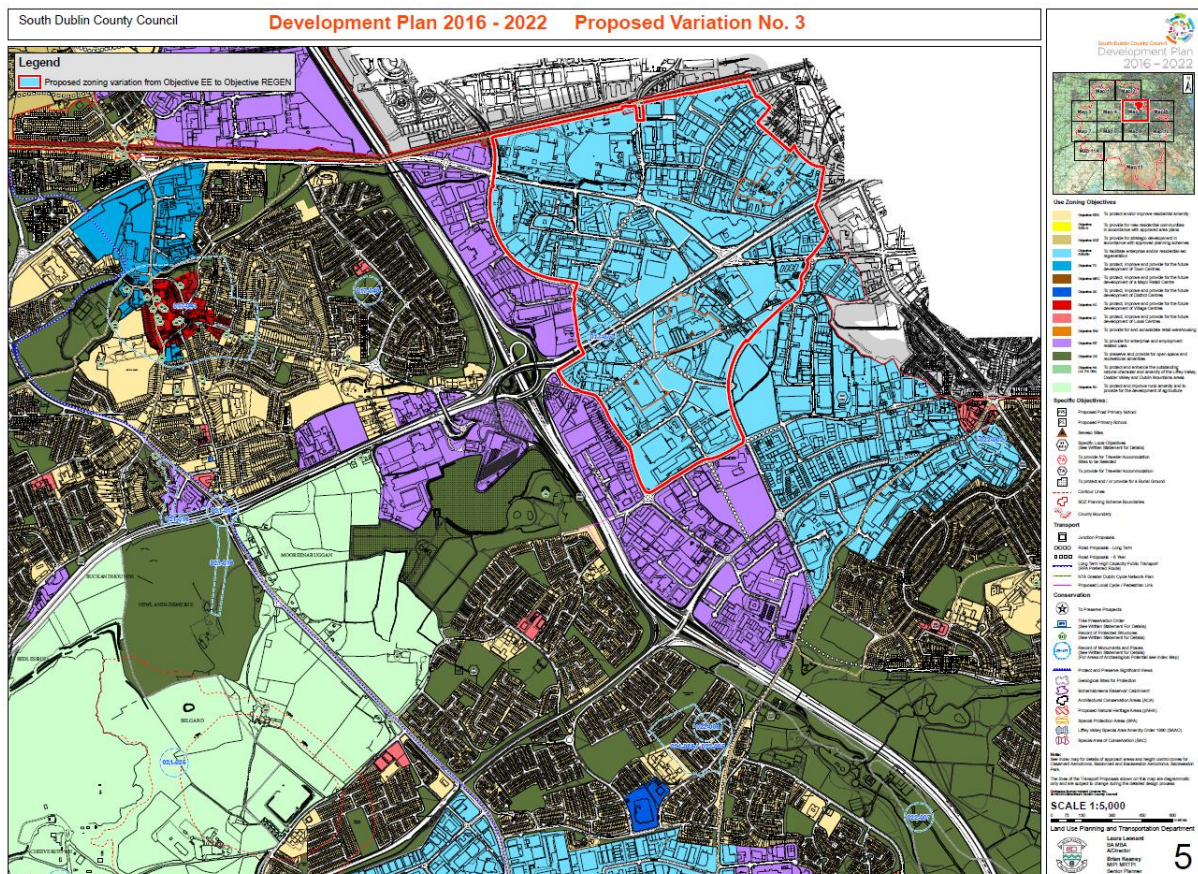


Figure 5.2 – Proposed Variation No.3 on the South Dublin County Council Development Plan 2016 2022 Land Use Zoning Map

5.3.2 Core Strategy Implications of the Rezoning of lands to Regeneration (REGEN)

Housing Land Capacity

As outlined in the Land Use tables in Section 5.3.1 of this Report, the ‘Residential’ land use is permitted in principle in the REGEN zoning and not permitted in the EE zoning. As such, Proposed Variation No 3 to amend c.178 hectares from EE to REGEN impacts on the future housing capacity of the County. The Core Strategy of the Development Plan identifies capacity for approximately 41,143 residential units in the County. This figure consists of the remaining capacity on zoned lands from the previous 2010 – 2016 Development Plan and the new zonings that permit residential uses in the Development Plan.

Table 1.8, 1.9 and 1.10 in the Core Strategy detail the housing capacity of zoned lands in South Dublin under the settlement hierarchy. Proposed Variation No 3 rezones lands at Naas Road are within the Consolidation Areas with the Dublin Gateway (shown in purple in Figure 5.3). The Consolidation Area refers to the established areas between the ‘Gateway Core’ of Dublin and the ‘Metropolitan Consolidation Towns’ of Tallaght, Clondalkin and Lucan.



Figure 5.3 South Dublin County Core Strategy Map

In the Consolidation Areas within the Gateway, the Core Strategy identifies a residential capacity of 9,620 units on sites with a total area of 295 hectares (ha). Of that 295 ha, c.78 ha is zoned REGEN as part of the Development Plan, c.70 ha located adjoining the Proposed Variation No 3 lands to the south east and extending to Walkinstown/ Greenhills Road and c8ha at Cherry Orchard Industrial Estate. On the 78ha, a housing capacity output of 2,419 units is assigned. This housing capacity output assumes a build out on circa 50% of lands zoned REGEN up to 2025.

Analysis undertaken to inform the Two Year Progress Report on the Development Plan indicates that significant development of the REGEN zoned lands has not happened in this area. It is considered highly unlikely that the housing capacity outcome of 2,419 units will be provided within the lifetime of the Development Plan on the existing c.78 ha of REGEN lands in the Consolidation Area within the Gateway. The Development Plan states that consolidation and sustainable intensification in established urban and suburban areas, through infill development and brownfield redevelopment on 'REGEN' zoned lands, is a priority.

The Guidance Note on Core Strategies, DECLG (2009) outlines that any excess of lands or housing capacity will not normally include lands identified for strategic long term development as part of major

regeneration sites. Later phases of development in these strategic areas can be considered to form part of a strategic land bank that may take a number of development plan cycles to be realised.

The Core Strategy assigns 2,419 units to the existing c78 ha of REGEN zoning in the Consolidation Areas within the Gateway. It is considered that the increase in the land bank by c178 ha does not require a proportionate increase in the housing capacity output in the Core Strategy as the lands are a strategic land bank. The output on the 256 ha (78 ha+178 ha) is highly unlikely to achieve the 2,419 units assigned to the existing REGEN zoning with the life time of the Development Plan.

Note: Please review Section 6.0 for full details of the change to the Tables in the Core Strategy.

Core Strategy Policies and Objectives

The content of the Proposed Variation No 3 includes for an amendment to the written text of the existing Specific Local Objective for the area, namely CS6 SLO1. The SLO seeks to deliver a plan led approach to the redevelopment of the lands.

Economic Development & Tourism Policies and Objectives

The Proposed Variation No 3 will have a positive economic impact and supports the diversification and modernisation of employment in the area. The Proposed Variation No 3 and ambition for the regeneration of the Ballymount/ Naas Road area will result in the need to relocate some existing industries. It is considered that the extension to Grange Castle and the availability of existing units and lands zoned EE in the County offer relocation potential for these industries in South Dublin County.

Having regard to the content of the Economic Development and Tourism Chapter, it is considered that the Development Plan provides strong policy support for expanding the REGEN zoning. Proposed Variation No 3 will ensure that there is sufficient land available for the renewal of the employment profile within an area with high quality public transport.

5.4 Locational Advantages of the Subject Lands

As outlined in Section 3.0 'Vision for the Area and Potential of Subject Lands', the subject lands have significant locational advantages, including:

- Located inside the M50, within 6km of Dublin City Centre;
- Occupy a pivotal location along a gateway corridor to Dublin City Centre;
- Serviced by the Luas Red Line, connecting the area with the city centre, Heuston Station, St. James's Hospital and other key destinations;
- In close proximity to the Kildare rail line, providing regional and national connectivity;
- Access to a range of existing and proposed bus services, both Dublin Bus and nationally; and
- High quality regional road connections, traversed by the Naas Road, Long Mile Road and Ballymount Road.

Overall, the subject lands at Ballymount/ Naas Road have significant locational and infrastructural advantages over other lands in Dublin. The potential of the area is widely recognised, including in the Draft RSES and the Naas Road Framework Plan 2010. It is envisaged that this Proposed Variation No 3 is the first step in an ambitious plan, providing a revised and updated local planning framework, to redevelop the area to achieve residential homes and economic growth.

5.5 Urban Regeneration Development Fund

The Ballymount/ Naas Road area is an underutilised brownfield area and represents a unique opportunity to regenerate a historical industrial/manufacturing edge location in Dublin. National and Regional policy promotes urban regeneration and it is considered that the subjects lands offer a logical sequential location for substantial regeneration.

In response to the NPF and the NDP, SDCC submitted a joint Urban Regeneration Development Fund (URDF) application with DCC for funding for the Naas Road/ Ballymount area under the €2 Billion URDF to support strategic growth and urban renewal in Dublin.

The submitted joint funding bid is a Category B type bid to the value of €437,500. It was submitted to the DHPLG in September 2018. The URDF will operate on a competitive, bid-based Exchequer grant basis, with proposals being required to demonstrate that they will be innovative and transformational urban regeneration projects.

The bid supports a series of studies to inform the future spatial planning of the area, including a Transport Assessment and Strategy, an Economic Viability Study, a Surface Water Management Strategy, a Flood Risk Assessment and a Constraints Study. The aim of the Category B funding is to development proposals that support the implementation of the NPF that may be initiated in 2019 or subsequent years to a 'ready to go' status for Category A funding.

The DHPLG outline that the types of projects eligible for funding under URDF include, but are not limited to the acquisition, enabling and/or development of areas, sites and buildings, relocation of uses, public amenity works, community facilities, and infrastructure related to housing, economic or skills development (including enterprise and tourism), transport, services infrastructure and/or transition to a low carbon and climate resilient society, in an urban context.

The rezoning of the lands to REGEN supports the joint SDCC/ DCC URDF Category B bid and expedites future opportunities for significant capital funding in a Category A bid to deliver a range of projects for the area.

6.2 Amendment to the Core Strategy Tables

The Proposed Variation No.3 will amend the Core Strategy figures as follows:

- Increase the New Regeneration Zoning in Table 1.9 of the Core Strategy;
- Insert Footnotes in Table 1.9; and
- Amend figures in Table 1.10 South Dublin County Development Plan 2016 -2022 Total Capacity.

Amendments to the text of the written statement are identified by their location in the text.

Additions to the text are identified through the use of **green print**, for example:

V - Additional 178 ha added as part of Variation No.3 (Q1 2019)

Deletions to the text are shown in red print with strikethrough, for example:

~~78~~

Table 1.9 - NEW RESIDENTIAL AND MIXED USE ZONING 2016 -2022

HIERARCHY	New Zonings	Housing Capacity	New REGEN Zoning	Housing Capacity	TOTAL (HA)	TOTAL (UNITS)
Consolidation Areas within the Gateway						
Palmerstown, Naas Road, Templeogue, Ballyroan, Ballyboden, Edmondstown, Knocklyon, Firhouse / Ballycullen and parts of Greenhills, Terenure and Rathfarnham.	0	669	256 v 78	2419 vv	256 78	3088
Metropolitan Consolidation Towns						
Tallaght	10	820	58	1444	67	2264
Lucan (inc. Adamstown)	4	151	2	26	6	177
Clondalkin (inc. Clonburris)	41	0	0	0	41	0
Moderate Sustainable Growth Towns						
Saggart / Citywest	3	120	0	0	3	120
Small Towns (within the Metropolitan Green Belt)						
Newcastle	0	0	0	0	0	0
Rathcoole	5	100	0	0	5	100
Rural Areas						
Metropolitan Area				75		75
Hinterland Area				25		25
Total	63	1860	316 138	3989	379 201	5849

New footnotes:

v - Additional 178 ha added as part of Variation No.3 (Q1 2019)

vv - Additional strategic long term units excluded from new residential capacity. Assumed that the additional land bank of REGEN at Naas Road will not exceed 2,419 units in the life time of this Plan

Table 1.10 South Dublin County Development Plan 2016 -2022 Total Capacity

HIERARCHY	TOTAL LAND (HA)	TOTAL CAPACITY (UNITS)
Consolidation Areas within the Gateway		
Palmerstown, Naas Road, Templeogue, Ballyroan, Ballyboden, Edmondstown, Knocklyon, Firhouse / Ballycullen and parts of Greenhills, Terenure and Rathfarnham.	473 295	9620
Metropolitan Consolidation Towns		
Tallaght	156	5412
Lucan (inc. Adamstown)	218	8304
Clondalkin (inc. Clonburris)	315	10748
Moderate Sustainable Growth Towns		
Saggart / Citywest	138	4196
Small Towns (within the Metropolitan Green Belt)		
Newcastle	28	701
Rathcoole	44	1062
Rural Areas		
Metropolitan Area	0	75
Hinterland Area	0	25
Completions 2011 to jan 2015		1,001
Total	1,372 1,195	41144

6.3 Amend Specific Local Objective

The Development Plan includes a Specific Local Objective (SLO) for the proposed site under Section 1.9.0 Local Area Plans, Approved Plans and Studies in the Core Strategy. As part of Proposed Variation No 3, it is proposed to replace the text of CS6 SLO 1. The new SLO extends the relevant area for a future plan to include the Proposed Variation No.3 lands, the existing REGEN lands in the Development Plan and the Local Centre lands at Walkinstown.

The intention of the SLO text is to outline that the regeneration of the subject lands will be plan led and will be informed by the previous work on the Naas Road Framework Plan (2010). The proposed SLO complements the existing policies and objectives in the Development Plan in relation to development in the Regeneration Zone, including Section 4.3.2 Employment and Residential in Regeneration Zones and Section 11.2.4 Regeneration Zone.

The Proposed Variation No.3 amends Specific Local Objective CS6 SLO 1 to read:

CS6 SLO 1:

To initiate a plan led approach to the sustainable regeneration of the brownfield lands in the Naas Road / Ballymount REGEN zoned lands. The plan led approach will include the preparation of a masterplan in 2019 with a view to preparing a Local Area Plan or other appropriate mechanism for the Regeneration (REGEN) and Local Centre (LC) at Walkinstown zoned lands. The masterplan will provide a framework for the sequential and phased development of the lands, integrating sustainable transport, land use and blue and green infrastructure. The spatial planning of the area will be informed by the Naas Road Framework Plan (2010).

~~To prepare a Ballymount Local Area Plan for lands zoned REGEN, EE, and LC, stretching southwest from Walkinstown Roundabout along the Greenhills Road (including those areas adjacent to Greenhills Estate) to the M50, north from there to the Red Cow, east from there along the Naas Road to the city boundary, and along the boundary back to Walkinstown Roundabout. The subject Local Area Plan to be concluded by the end of 2018; and the lands north of this between the M50, the Grand Canal and city boundary currently zoned EE to be considered for inclusion in this plan. The Naas Road Framework Plan (2010) to be taken into consideration during the preparation of the Local Area Plan.~~

7.0 Conclusion

This Report has been prepared to set out the planning policy context and rationale for the Proposed Variation No.3 to the Development Plan.

Proposed Variation No 3 to the Development Plan seeks to rezone c.178 hectares of “Enterprise and Employment” (EE) zoned lands in the Naas Road / Ballymount area to “Regeneration” (REGEN).

Proposed Variation No.3 is in response to the recent changes in National and Regional planning policy, namely the publication of the National Planning Framework (NPF) and the Eastern and Midland Assembly (EMA) Draft Regional Spatial and Economic Strategy (RSES) in 2018. The area constitutes a key transformation opportunity to support the compact development of Dublin in accordance with the NPF and the Draft RSES.

Proposed Variation No 3 will provide for additional lands inside the M50 to promote the regeneration of underutilised brownfield lands for a mixed use environment of residential and commercial. Proposed Variation No 3 will provide a strategic land bank for SDCC which will be developed sustainably over an extended period, providing significant employment and residential capacity for the County. It is considered that Proposed Variation No 3 will increase the amount of REGEN zoning and thus provide further brownfield regeneration opportunities for the market. However, it is not anticipated that the REGEN lands will have a significant impact on the housing land capacity in the Core Strategy of the Development Plan.

The vision and ambition of SDCC for the Naas Road area is to transform this brownfield area of national significance into a sustainable, vibrant, mixed use urban quarter that capitalises on its strategic location inside the M50 and the existing Luas Red Line, creating a sense of identity and place that reaches out and connects with the surrounding urban context. The vision for the area is to integrate land use and public transport to maximise the potential of the Luas line and the Bus Connects network in close proximity to Dublin City Centre.

SDCC is committed to delivering a plan led approach for the redevelopment of the area. To this end, a joint bid with DCC has been submitted to the Minister for financial assistance under the URDF to support a series of studies to inform the future spatial planning of the wider area. The rezoning of the lands to REGEN supports the joint URDF bid and expedites future opportunities for significant capital funding for enabling infrastructure in the area.

The Proposed Variation No.3 is required to align the Development Plan with the NPF and the Draft RSES to create the conditions for redevelopment of the area in partnership with DCC. Given the complexity of the challenges to regenerating the area, Proposed Variation No 3 to the Development Plan at this time is required to provide an amended Development Plan policy framework for SDCC to proceed with the regeneration of the area. The lead in time on the regeneration of the area is likely to be medium term to long term. Proposed Variation No.3 will enable the commencement of this process in 2019.

In conclusion, The Naas Road/ Ballymount area represents a unique opportunity to regenerate a historical industrial/manufacturing edge location in Dublin to provide for new homes, jobs, schools, community facilities and amenities in a sustainable and compact form of urban development which is served by high quality public transport and active modes. Proposed Variation No.3 is in accordance with key national and regional objectives and the proper planning of Dublin as a sustainable compact city with integrated land use and sustainable transportation.