

Tionól Reigiúnach Oirthir agus Lár-Tíre Eastern and Midland Regional Assembly

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Proposed Variation No. 3 of the Dublin City Development Plan 2022-2028

The Eastern and Midland Regional Assembly notes the publication of the proposed Variation No. 3 of the Dublin City Development Plan 2022-2028 and sets out hereunder observations on behalf of the Assembly. The submission has been prepared by the executive and approved by the Cathaoirleach of the Eastern and Midland Regional Assembly (EMRA).

1.0 Regional Spatial and Economic Strategy (RSES)

The Council will be aware of the finalisation of the Regional Spatial and Economic Strategy for the Eastern and Midland Region which was made on 28th June 2019. In line with the provisions of the Planning and Development Act 2000, as amended, the planning authority shall ensure, when making a variation to the development plan, that it is consistent with the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region, thus ensuring full alignment between local, regional and national planning policy. In this regard, the Regional Assembly welcomes the proposed variation to the City Development Plan.

2.0 Legislative Context

Under Section 27C of the Planning and Development Act 2000, as amended, the Eastern and Midland Regional Assembly, is obliged to prepare submissions/ observations to be submitted to the relevant planning authority and copied to the Office of the Planning Regulator.

A submission shall contain a report which shall state whether, in the opinion of the Regional Assembly, the draft variation of the development plan, is consistent with the Regional Spatial and Economic Strategy. If, in the opinion of the Regional Assembly the proposed draft variation of the development plan is not consistent with the RSES, the submission / observations and report shall include recommendations as to what amendments, in the opinion of the Regional Assembly, are required to ensure that it is consistent.

This report contains the opinion of the Eastern and Midland Regional Assembly in relation to the above matter along with recommendations as required under Section 27C of the Planning and Development Act 2000 as amended.

3.0 Proposed Variation No. 3 Lands at Botany Weaving Mill Ltd, Emerald Square, Cork Street, Dublin 8

Proposed Variation No. 3 seeks to vary the Dublin City Development Plan 2022-2028 in respect of the following;

It is proposed to vary the Dublin City Development Plan 2022-2028, by changing the land use zoning objective of lands at Botany Weaving Mill Ltd, Emerald Square, Cork Street, Dublin 8:

From: Zoning Objective Z1: Sustainable Residential Neighbourhoods – *‘To protect, provide and improve residential amenities.’*

To: Zoning Objective Z4: Key Urban Villages and Urban Villages– *‘To provide for and improve mixed-services facilities’*

Reason: The Botany Weaving Mill Ltd premises / lands are subject to two zoning objectives under the Dublin City Development Plan 2022-2028; Z1 ‘Sustainable Residential Neighbourhoods’ and Z4 ‘Key Urban Villages/Urban Villages’. A change to a Z4 zoning (Key Urban Villages / Urban Villages) on the whole premises would allow the development of urban village uses on the lands. The proposed variation would also support the retention of the existing light industrial use on the lands. An urban village zoning, rather than a residential zoning, would more appropriately support the continuation of the existing weaving and textile industry on the lands, in line with Development Plan Policy.

3.1 Location and Description of the Subject Lands

The subject lands (approximately 0.4ha in area) are located in the Liberties in the southwest inner city at Emerald Square, Cork Street, Dublin 8. The lands are occupied by Botany Weaving Mills Limited, a long established (since the 1930’s) manufacturing firm (weaving textiles).

The overall commercial premises comprises an irregular shaped plot which abuts Cork Street to the southeast, Vauxhall Avenue (a pedestrian walkway) and Morning Star Road / Rosary Road to the east, and Emerald Square to the west.

Botany Weaving Mill is bounded to the east and west by well-established residential areas. The southern part of the premises, which is not the subject of this proposed draft variation, fronts onto Cork Street. Cork Street is characterised by commercial and community uses such as the Coombe Hospital which lies near the subject lands.

There are industrial units and associated offices on the lands which range from single-storey to three-storey in appearance. Vehicular access to the lands is via Emerald Square, Morning Star Road and Vauxhall Avenue off Cork Street and there is surface car parking on the lands.

The subject lands are well served by and connected to the surrounding transport and movement corridors. This includes bus routes /cyclepaths with direct access to the city centre and the proposed BusConnects Tallaght/Clondalkin to City Centre route.

The Fatima Luas stop on the red Luas line is in close proximity to the lands. The Grand Canal, with its Greenway lies due south of the subject lands, within walking distance.

3.2 Purpose of the Draft Variation

The Botany Weaving Mill premises are subject to two zoning objectives under the Dublin City Development Plan 2022-2028. The majority of Botany Weaving Mills lands are zoned Z1 'Sustainable Residential Neighbourhoods'. The frontage of the premises onto Cork Street is zoned Z4 'Key Urban Villages/Urban Villages', reflecting the urban village / mixed use nature of that road.

The draft variation proposes that the whole Botany Weaving Mill lands will be subject to a Z4 zoning. A Z4 zoning (Key Urban Villages / Urban Villages) pertaining to the whole premises would allow the development of urban village uses / a mixture of uses including residential uses on the lands. The proposed variation would also support the retention of the existing light industrial use on the lands.

In this regard Dublin City Council considers that the urban village zoning, rather than a residential zoning, would more appropriately support the continuation of the existing weaving and textile industry on site which has been in-situ since the 1930's.

The weaving industry has been synonymous with the Liberties area and is acknowledged within Chapter 12 (Volume 1) of the Dublin City Development Plan 2022 – 2028. Botany Weavers Mill in particular is of local historical interest as the lands are recorded as an 'industrial heritage site' (City Woollen Mills) and the existing manufacturing firm is the remaining weaving company in the Liberties.

3.3 Background to the Proposed Variation

Prior to 2011 the subject lands were zoned for manufacturing / employment uses. Under the Dublin City Development Plan 2011 – 2017, the subject lands were zoned Z1 (Residential) and successive plans have retained this land use zoning objective. The Liberties Local Area Plan, which expired in 2020, identified that these lands have the potential to be redeveloped for residential purposes.

Dublin City Council has received no planning application for residential development on these lands over the past 20 years.

A rezoning request from the landowners arose outside of the Residential Zoned Land Tax (RZLT) statutory process. The landowners of the subject lands have requested that the lands be rezoned to Z4 or Z6. Dublin City Council is proposing a rezoning to Z4 for the reasons outlined above.

3.4 Consistency with the Dublin City Development Plan 2022-2028

The core strategy of the Development Plan indicates that Strategic Development Regeneration Area (SDRA) 15, which the subject site is located within, has a proposed residential yield of 2,500 housing units. It is not anticipated that the proposed variation will impact on this referred residential yield.

The subject lands are located within Key Opportunity Site 8 (the Maryland Character Area) of SDRA 15 (Liberties and Newmarket Square) in the current City Development Plan. The guiding principles for Key Opportunity Site 8 identify that new development on these lands have the potential to increase connectivity within the Maryland character area and to provide for increased heights where residential amenity considerations allow.

The proposed variation can facilitate, the delivery of between 40 to 100 housing units in an area targeted for regeneration consistent with the core strategy of the Development Plan.

The purpose of the proposed variation is to recognise the existing commercial use in-situ, and to facilitate the development of urban village uses / a mixture of uses including residential uses on the lands in the future, if a change of use is being considered. The proposed variation will support the retention of the existing light industrial use on the lands.

Any future redevelopment of the lands under a Z4 zoning can accommodate the desired permeability interventions and compact development as provided for in the SDRA 15 Guiding Principles.

Dublin City Council considers that the proposed variation is consistent with the guiding principles relating to Key Opportunity Site 8 in Chapter 13 of the City Development Plan. The Council concludes that the proposed draft variation is consistent with national and regional planning policy / objectives / planning guidelines.

Proposed Zoning Amendments

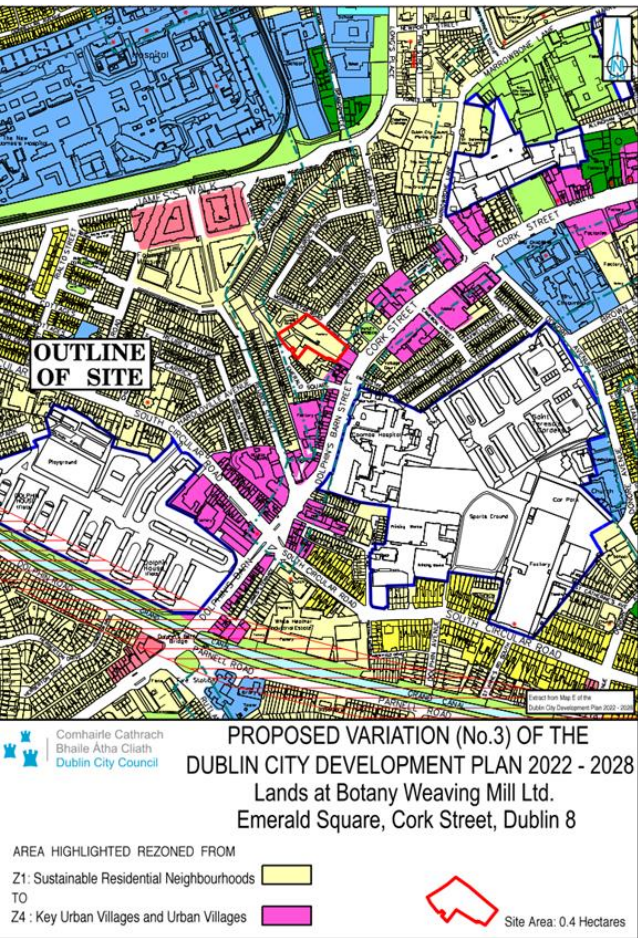


Figure 1: Extract of map from report on proposed Variation No. 3 of the Dublin City Development Plan 2022-2028 indicating the location of the subject site and proposed zoning amendments on lands at Botany Weaving Mill Ltd, Emerald Square, Cork Street, Dublin 8.

4.0 Submission

The Regional Assembly acknowledges proposed Variation No. 3 of the Dublin City Development Plan (CDP) 2022-2028, which seeks to rezone approximately 0.4ha of lands at Botany Weaving Mill Ltd, Emerald Square, Cork Street, Dublin 8 as follows:

From: Zoning Objective Z1: Sustainable Residential Neighbourhoods –

‘To protect, provide and improve residential amenities.’

To: Zoning Objective Z4: Key Urban Villages and Urban Villages–

‘To provide for and improve mixed-services facilities’

It is noted that Dublin City Council considers that the proposed change from a Z1 to a Z4 zoning objective (Key Urban Villages / Urban Villages) pertaining to the whole premises would allow the development of urban village uses / a mixture of uses including residential uses on the lands. The proposed variation would also support the retention of the existing light industrial use on the lands. The Council states that it is also considered that the urban village zoning, rather than a residential zoning, would more appropriately support the continuation of the existing weaving and textile industry on site which has been in-situ since the 1930’s.

The Regional Spatial and Economic Strategy (RSES) sets out 16 Regional Strategic Outcomes (RSOs) which are aligned with national policy, specifically the National Planning Framework. These are cross referenced and aligned with the three key principles of the RSES; Healthy Placemaking, Climate Action and Economic Opportunity. The most relevant RSO which supports the proposed variation is RSO 2, ‘Compact Growth and Urban Regeneration’, which is to *‘promote the regeneration of our cities, towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint and to drive the delivery of quality housing and employment choices for the Region’s citizens’*. This aligns with National Strategic Outcome 1 of the National Planning Framework.

The proposed variation would facilitate the future development of an urban village and mixed uses at this brownfield site including the provision of residential development. The variation would also allow for a more flexible approach to development proposals at the overall site which would support the continuation of the existing weaving and textile industry which has been historically associated with the site.

The Regional Assembly supports in principle the proposed change of land use zoning objective which allows for a mix of land uses at this brownfield/regeneration site which aligns with the RSES Dublin MASP guiding principles for the growth of the Dublin Metropolitan Area including co-ordination and active land management and social regeneration.

The proposal compliments RPO 4.3 in the RSES which seeks to *‘Support 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.’*

Given the built-in headroom figures contained in the current Dublin City Development Plan it is considered that the proposed variation will not have a material impact on the core strategy of the Dublin City Development Plan 2022-2028 from a housing delivery perspective. The proposed variation will align with Regional Strategic Outcome 2 and Regional Policy Objective 4.3 of the RSES for the Eastern and Midland Region 2019-2031 as it relates to Dublin City and the wider Metropolitan Area.

Accordingly, the Regional Assembly does not have any objection to the proposed draft Variation No. 3 of the Dublin City Development Plan 2022-2028 as placed on public display.

5.0 Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA)

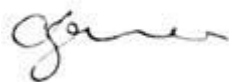
The proposed variation underwent a screening for Strategic Environmental Assessment (SEA) and concluded that the proposal does not require a Strategic Environmental Assessment as it would be unlikely to have significant effects on the environment, taking account of the relevant criteria set out in Schedule 2A of the Planning and Development (Strategic Environmental Assessment) Regulations 2004 and any submission or observation received from the designated environmental authorities specified in Article 13A(4).

Furthermore, a screening for Appropriate Assessment (AA) was also carried out and concluded that the proposed variation will not have any significant cumulative, direct or indirect impacts on a European site, therefore it is not considered necessary to undertake any further stages of the Appropriate Assessment process.

6.0 Conclusion

It is considered that the proposed Variation No. 3 to the Dublin City Development Plan 2022-2028, is consistent with the Regional Spatial and Economic Strategy (RSES) 2019-2031, having regard to the observations outlined above.

Regards,



Clare Bannon
Acting Director
Eastern and Midland Regional Assembly
20th October 2023